

07/17/2023  
IPCB 2023-064

Paul Christian Pratapas  
Complainant

v

Cantera Development Holdings, LLC  
Respondent

### **COMPLAINANTS RESPONSE TO 2ND MOTION FOR DISMISSAL**

Respondent states Complainant did a poor job in detailing the site and or respondent and service was not made in time per the deadline set by The Board. And made additional disparaging comments regarding the quality of service made by Complainant.

Of the 25 formal complaints I filed with The Board. This site is one of 24 which did not have required regulatory signage. These build sites have complex and unique identifiers and need the required info posted so citizens can petition the Government for relief in a fair and timely manner. A right granted under our Civil Liberties. The only sign at a prominent area, or any area, listed "Arden" and invited people driving by to check them out.

The one site of the 25 which had the proper signage had significant issues identified by myself because I was able to track down all the relevant info and people allowing for immediate intervention by Contracted ILEPA Inspector Patrick.

If this site has been segmented, this signage would be even more crucial for petitioning the government for relief as guaranteed by my Civil Liberties. This is also the site with a contractor who harassed my parents at their home and then myself via text message which required immediate relief.

The Shelby County Environmental Health Department pushed back my onboard date to July 3, 2023 which impacted my ability to send certified mail due to economic constraints.

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Greater compliance with permit regulations would reduce this burden Respondent finds so problematic.

Service was made to the Name and Address provided by The Board. I have been unsuccessful in finding permitted sites with the required signage, willingness to provide access to SWPPP Books, and/or to communicate with me in a manner in which I can get the information I need in order to petition the government for relief. My own online searches for registered agent info have been fruitless, as well.

I would ask The Board to note Respondents failure to see their own noncompliance as the root of their argument against Complainant. A pervasive pattern within several Formal Complaints filed with The Board.



*Paul Christian Pratapas*      7/17/2023

Paul Christian Pratapas  
1779 Kirby Parkway, Ste 1, #92  
Memphis, TN 38138  
630.210.1637

<  +1 (331) 452-3591 >



Hello Paul my name is James yesterday you tagged a bunch of photos to our company that have nothing to do with it. I don't know if this was done by mistake.

  Text Message 

<  +1 (331) 452-3591 >

Do not contact me and my family again or you will receive a restraining order.

Would you like to give me your attorney's number now we have an attorney on retainer I will continue to contact you until you remove the photos. If you would like to do this through the court system please let me know and we can easily go that route.

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PAUL CHRISTIAN PRATAPAS, )

Complainant, )

) PCB No: 23-64

v. ) (Citizens Enforcement – Water) )

, )

Respondent, )

CANTERA DEVELOPMENT HOLDINGS, LLC )

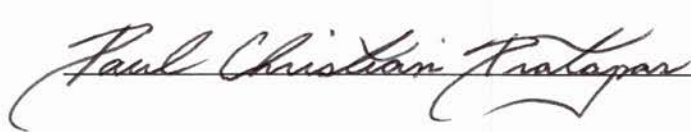
**NOTICE OF FILING**

**TO:** See Attached Service List

**PLEASE TAKE NOTICE** that on 07/17/2023, PAUL CHRISTIAN PRATAPAS electronically filed with the Office of the Clerk of the Illinois Pollution Control Board

RESPONSE TO 2ND MOTION TO DISMISS, copy of which is hereby served upon you.

Paul Christian Pratapas  
Complainant

 7/17/2023

Paul Christian Pratapas  
paul.pratapas@gmail.com  
1779 Kirby Parkway, STE 1-92  
Memphis, TN 38138  
630.210.1637

**CERTIFICATE OF SERVICE**

I, Paul Christian Pratapas, certify that I caused the foregoing FORMAL COMPLAINT to be served all parties of record, as shown below:

William Anaya  
Greensfelder, Hemker & Gale, P.C.  
[wanaya@greensfelder.com](mailto:wanaya@greensfelder.com)  
200 W Madison  
Suite 3300  
Chicago, IL 60606

Paul Christian Pratapas  
[paulpratapas@gmail.com](mailto:paulpratapas@gmail.com)  
1779 Kirby Parkway, Ste 1, #92  
Memphis, Tennessee 38138

Illinois Pollution Control Board  
Don Brown - Clerk of the Board  
[don.brown@illinois.gov](mailto:don.brown@illinois.gov)  
100 W. Randolph St. Suite 11-500  
Chicago, Illinois 60601  
(312)-814-3620

by causing a copy of same to be sent via email transmission to the email addresses reflected above on the 17th day of July, 2023.

Paul Christian Pratapas

Complainant

 7/17/2023