

## Electronic Filing: Received, Clerk's Office 04/18/2024

**From:** [Paul Pratapas](#)  
**To:** [Madry, Erica](#)  
**Cc:** [Halloran, Brad](#); [PCB.Clerks](#); [Neeshia Hee Macanowicz](#)  
**Subject:** [External] Re: 2024in01334-LTR- eINITC- Halloran  
**Date:** Thursday, April 18, 2024 11:59:48 AM  
**Attachments:** [image001.png](#)

---

Here is an additional case two years before I started filing the exact same complaints about the exact same thing by the exact same people.

The ILEPA implementing an illegal and unauthorized version of the NPDES permit program And refusing to provide public access to regulatory information for citizen enforcement.

This is one of two cases filed by the city of and a resident of Glenview, IL for failures of the ILEPA to properly implement a federal program.

Regardless of formatting and procedural constraints. As an attorney and government employee trusted with the well-being of the residence of Illinois. Brad should have reported the fraud to OIG. Instead, Brad. condoned and made decisions to dismiss which by default demonstrated the State of IL condoning and assisting in ilegal activity.

just one instance of a permit holder intentionally and knowingly refusing access to the stormwater binder and threatening to call the police because they don't know the laws is enough to warrant a report to OIG. And Brad was provided with dozens of photographs and other text messages all of which are undeniable Evidence of fraud and waste within a federal program implemented by a state agency.

He did not make the necessary reports. He instead conspired with the offenders to continue the racket. Also known as a continuing criminal enterprise. A violation of United States RICO Act. Resulting in my entire caseload being referred to the FBI.

You cannot tell the citizens enforcing that they have to follow every single rule to the T or cases will be dismissed at the same time letting federal permit holders make up their own rules and totally circumvent the primary enforcement mechanism.

Personally, I think Brad should be arrested And charged along with the permit violators as part of the conspiracy.

When bound by a contractor certification which states the signer understands and accepts responsibility for their Permit requirements. They may not totally violate those requirements, Refuse access to regulatory materials supposed to be made available to the public, and then hire an attorney to make fall statements on their behalf to sway the board.

They cannot argue whether or not they polluted or violated the permit. they can only argue to which degree given the photographic evidence provided.

Most Of the guidelines were discussing do not have thresholds. It is a presence absence. If there is no regulatory signage up and I take a picture, that cannot be argued. That is violating the contractor certification and an attorney making materially false statements.

Concrete washout areas in total violation photographed on a Saturday cannot be argued just a

Electronic Filing: Received, Clerk's Office 04/18/2024

discussion of the degree of pollution.

And if I'm the only one who knows the rules and the Illinois EPA says it's all OK, You need to report that to someone else.

so as we all sit here today, the Illinois pollution board, and the attorneys who run it have been aware of fraud within a federal program implemented by a state agency for no less than four years without taking action against anyone other than the citizens filing complaints.

<https://pcb.illinois.gov/documents/dsweb/Get/Document-103845>

[Sent from the all new AOL app for iOS](#)

On Tuesday, April 16, 2024, 8:06 AM, Madry, Erica <EMadry@iadc.org> wrote:

Attached please find correspondence from the Attorney Registration and Disciplinary Commission.

Email is now the preferred method of communication for ARDC matters. Please send any email communications regarding this matter to [emadry@iadc.org](mailto:emadry@iadc.org).

If you have any questions or need to speak with a member of our staff, please call our general number: (312) 565-2600.

On behalf of John R. Cesario.

*Erica D. Madry*

Attorney Registration & Disciplinary Commission  
One Prudential Plaza  
130 East Randolph Drive, Ste, 1500  
Chicago, IL 60601  
Telephone: (312) 565-2600