

# Electronic Filing: Received, Clerk's Office 04/26/2024

**From:** [Tipsord, Marie](#)  
**To:** [Fox, Tim](#); [Brown, Don](#)  
**Subject:** FW: [External] Fw: Webform submission from: EPA OIG Hotline Complaint Form  
**Date:** Friday, April 26, 2024 7:20:26 AM

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fyi

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**From:** Paul Pratapas <paulpratapas@aol.com>  
**Sent:** Thursday, April 25, 2024 8:18 PM  
**To:** Tipsord, Marie <Marie.Tipsord@illinois.gov>  
**Subject:** [External] Fw: Webform submission from: EPA OIG Hotline Complaint Form

See below. I will not participate in your kangaroo kourt.  
Begin forwarded message:

On Thursday, April 25, 2024, 8:08 PM, Environmental Protection Agency Office of Inspector General <[no-reply@cigie.gov](mailto:no-reply@cigie.gov)> wrote:

Submitted on Thu, 04/25/2024 - 21:08

Submitted values are:

**Type of Complaint**  
General

**Full Name**  
Paul Christian Pratapas

**Email**  
[paulpratapas@aol.com](mailto:paulpratapas@aol.com)

**Phone Number**  
630-696-2843

**Your Address**  
545 N Mendenhall Rd., #8  
Memphis, Tennessee. 38117  
United States

**Your Title and Position**  
"The Prince" : Certified Inspector of Stormwater

## **Alleged Wrongdoer Information**

**Type of Alleged Violator**  
Organization/Company

**What is the title/position held by the alleged wrongdoer?**

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Will be a director in the area of NPDES Clean Water Act Permits for Construction and their staff

### **Provide names, addresses, and telephone numbers of all subjects.**

Everyone at the ILEPA involved in the NPDES Permit Program, as well as, the Illinois Pollution Control Board.

## **Incident Information**

### **Provide a description of what occurred. What exactly did the individual(s) allegedly do wrong/how was the alleged wrongdoing committed? (Please provide specific and relevant details concerning the alleged misconduct/wrongdoing, to include any policies, regulations, and laws violated.)**

The ILEPA's implementation of the CWA NPDES Permit program has resulted in the program meeting the federal threshold for a continuing criminal enterprise.

This is being accomplished by the ILEPA intentionally, knowingly and repeatedly allowing the approval of plans which are deficient. Allowing the generation of fraudulent inspection reports to cover up violations. As well as, the approval of plans deficient in design and implementation which results in illicit discharges and permit violations.

They are also allowing and directing permit holders to work within an ILEPA invented paradigm which eliminates the primary enforcement mechanism, citizen enforcement. The mandatory and critically important regulatory signage is never posted. The ILEPA has led permit holders to think they don't have to post it or provide public access to the SWPPP Binder. This, is a violation of Civil Liberties. As the records are needed to file complaints. And the sign is supposed to have the permit number and other info needed for filing/serving complaints.

The situation is so bad. Head engineers of villages with 20 years experience don't know the basics of the rules and are approving wildly deficient SWPPPs. One head village engineer didn't know concrete washout was toxic and a controlled part of construction. He approves the SWPPP and building plans. Read that again.

The RICO issue is further raised when instead of spending money to comply with NPDES Permits, a publically traded construction company books that money as profit, reports it at the shareholder meeting and artificially inflates the stock price.

Furthermore, the fraudulent implementation of this federal program has resulted in my receiving threats by contractors who believe ILEPA has the authority to waive federal compliance and reinstate their own regulations.

The issue is made worse by the Illinois Pollution Control Board. Another organization which is a complete waste because:

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1. Contractors are so unaware, they are hiring lawyers to represent them without mentioning having signed a certification under penalty of law. Thereby, the attorneys violate their ethics code by going and making materially false statements on their behalf to the hearing officer and board.
2. The Board has been dismissing cases based on information tied to the ILEPA fraud, and failure by permit holders to comply with provisions related to citizen enforcement.
3. So, the board is making the issue worse and has been concealing the fraud by not reporting it to this office.
4. The pollution control board is making the laws unenforceable

### **Provide the date(s) and time(s) of the wrongdoing.**

At least the last four years

### **How you are aware of the alleged wrongdoing? (Please include when and how you gained this knowledge.)**

I was a compliance manager for one of the largest home builders in America. And then, used my background in psychology to generate a sample of ~20 sites all working under the same ILEPA paradigm. I then tried to file formal complaints with the Illinois Pollution Control Board. But, the board is still refusing to order permit holder do anything, instead they constantly order me to be more specific or some other irrelevant item as a reason for dismissal. But never addresses or reports the part where if the ILEPA won't tell federal permit holders they have to post the signs and info, it is nearly impossible to file any complaints anywhere within a reasonable amount of time. Everything with these permits is time sensitive.

I asked the ILEPA and Illinois Pollution Control Board for help viewing SWPPP binders. As soon as they found out it was to challenge the ILEPA and IPCB paradigm, they refused to help and allowed everything to continue as is.

### **Do you have firsthand knowledge of the wrongdoing?**

Yes

### **Where did the wrongdoing occur?**

ILEPA offices and at NPDES Permitted construction sites. Illinois Pollution Control Board HQ Chicago.

### **What was the effect of the wrongdoing? (Was there a loss to the government? Did anyone benefit/suffer from the wrongdoing?)**

I have received threats as well as my family. The housing industry is set up to collapse because of booking money earmarked for compliance as profit. Every penny the federal government gives the ILEPA and IPCB is wasted or used to attack me. Condone behaviors leading to citizens being threatened for engaging in constitutionally protected activities. And most major builders can and should be prosecuted under RICO. There is large scale pollution occurring every day. And the cement industry

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doesn't even know how to do their job while being in compliance because so many years have gone without anyone making them comply. Those trucks are dumping toxic water all over IL every day and IPCB and ILEPA have been aware for years. And their actions are always against me.

**Provide the identity of potential witnesses. Who else might be aware of this wrongdoing and how does the individual know? (Please provide names, addresses, and telephone numbers.)**

Lead engineer for village of Bollingbrook. Tom Paulowicz I believe. I set up a meeting to ask to view records at a permitted site. Printed a list of requests ahead of time. And in front of the head engineer and his Jr, made the basic requests while handing it to them in writing. The response from the ILEPA permitted site workers was to tell me they didn't have to. They also sent text messages saying they didn't have to. But, one of the first sections of the SWPPP binder is the certifications where under penalty of law contractors certify they understand the rules and agree to comply.

This is one of 20 sites I reported which did not know the rules, certified they did, then refused to comply. Then hired an attorney to avoid complying, in turn possibly getting the attorney disbarred.

If a certified inspector takes a picture of a violation. Permit holders can't hire an attorney and argue they didn't do it and don't have to follow certain permit requirements. They can argue the extent of pollution. Then they have to go through civil liability claims with all the contractors who signed the certification. Attorneys saying permit holders did not pollute, and then attack me in filings are making materially false statements, a violation of their ethics code.

I also brought my dog to all the inspections I did. His name is Vinnie and he was given to me by a diplomat from the UN who I have spoken to about this. So, ILEPA and IPCB are humiliating IL on an international level. And she doesn't like how you all let people threaten me.

I talked to Kerry Rawson, her dad is serial Killer BTK. She thinks you all should be ashamed of yourselves.

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