

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS, )  
*ex rel.* Eric Rinehart, State's Attorney )  
for Lake County, Illinois, )  
 )  
Complainant, )  
 )  
v. )  
 )  
ILLINOIS DEPARTMENT OF )  
TRANSPORTATION, )  
 )  
Respondent. )

PCB No. 2023-108  
(Enforcement Noise)

**NOTICE OF FILING**

To: Jamie Helton  
Assistant State's Attorney  
Lake County State's Attorney's Office  
18 N. County Street  
Waukegan, IL 60085  
jhelton@lakecountyil.gov

Please take notice that on the 2nd day of December, 2024, Respondent caused to be filed with the Clerk of the Pollution Control Board of the State of Illinois, pursuant to 35 Ill. Admin. Code §101.622(b), the attached Subpoena, a copy of which is attached hereto and herewith served upon you via e-mail.

Respectfully submitted,

ILLINOIS DEPARTMENT OF TRANSPORTATION,  
Respondent,

By: /s/ Erin Walsh  
Erin Walsh  
Special Assistant Attorney General  
Assistant Chief Counsel  
Illinois Department of Transportation  
69 W Washington St, 21st Floor  
Chicago, Illinois 60602  
Erin.walsh2@illinois.gov

**CERTIFICATE OF SERVICE**

Jamie Helton  
Assistant State's Attorney  
Lake County State's Attorney's Office  
18 N. County Street  
Waukegan, IL 60085  
jhelton@lakecountyil.gov

Illinois Pollution Control Board Brad  
Halloran, Hearing Officer James R.  
Thompson Center 100 W. Randolph,  
Suite 11-500  
Chicago, IL 60601  
E-mail: Brad.Halloran@illinois.gov

The undersigned, being first duly sworn upon oath, certifies that she caused a copy of the attached Subpoena to be served upon the above named at the above address via email on December 2, 2024.

Respectfully submitted,

ILLINOIS DEPARTMENT OF TRANSPORTATION,  
Respondent,

By: /s/ Erin Walsh  
Erin Walsh  
Special Assistant Attorney General  
Assistant Chief Counsel  
Illinois Department of Transportation  
69 W Washington St, 21st Floor  
Chicago, Illinois 60602  
Erin.walsh2@illinois.gov

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS,	)	
by Eric Rinehart, State's Attorney	)	
for Lake County, Illinois,	)	
	)	
Complainant,	)	
	)	
vs.	)	PCB No. 2023-108
	)	(Enforcement - Noise)
	)	
DEPARTMENT OF TRANSPORTATION	)	
of the State of Illinois,	)	
	)	
Respondent	)	

SUBPOENA DUCES TECUM

TO: Bruce Nathanson  
1871 McCraren Road  
Highland Park, IL 60035

Pursuant to Section 5(e) of the Environmental Protection Act (415 ILCS 5/5(e) (2022)) and 35 Ill. Adm. Code 101, Subpart F, you are ordered to attend and give testimony at the deposition in the above-captioned matter at 18th N County St, 5th Floor, Waukegan, IL, at 11:00 a.m. on December 10, 2024.

You are also ordered to bring with you documents relevant to the matter under consideration and designated herein, see attached rider.

Failure to comply with this subpoena will subject you to sanctions under 35 Ill. Adm. Code 101.622(g) and 101.802.

ENTER:



Don A. Brown, Clerk  
Illinois Pollution Control Board

Date: November 26, 2024

Pursuant to 735 ILCS 5/1-109, I served this subpoena duces tecum by mailing a copy to Bruce Nathanson, 1871 McCraren Road, Highland Park, IL 60035, by certified mail, return receipt requested (Receipt # 70121010000253535890) on November 26, 2024. I mailed payment for the witness in the amount of \$26 for witness and mileage fees.

A handwritten signature in blue ink, reading "Lidia Sanchez", is written over a horizontal line.

*People v. IDOT*, PCB 2023-108

**RIDER FOR DOCUMENTS**

You are commanded to produce to Respondent no less than three days prior to the deposition:

Any audio recordings, photographs, diagrams, or video recordings of or pertaining to the transverse rumble strips on US-41 northbound at Park Ave West.

Any communication with any individual from the Lake County State's Attorney's Office, the City of Highland Park, any elected official, or any individual associated with Mostardi Platt regarding the transverse rumble strips on US-41 at Park Ave or the pending litigation pertaining to those rumble strips.

Any communication with any individual from the Federal Highway Administration regarding the transverse rumble strips on US-41 northbound at Park Ave West or the Illinois Department of Transportation.

Any studies related to transverse rumble strips in your possession.

Any noise complaints you have submitted to any governmental agency or official related to the transverse rumble strips on US-41 northbound at Park Ave West or any other noise source in the vicinity of your home.