Electronic Filing: Received, Clerk's Office 09/24/2025

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT LASALLE COUNTY, ILLINOIS

COUNTY OF LASALLE,

Complainant,

VS.

AC No. 2026-002

TRI-COUNTY FAIR ASSOCIATION, INC., Respondent.

MOTION TO DISMISS

NOW COMES the Complainant, The County of LaSalle, Illinois, by Joseph R. Navarro, State's Attorney in and for the County of LaSalle, by his assistant, Attorney Jeremiah Adams, and in support of its Motion to Dismiss these proceedings, respectfully states as follow:

- 1. That on August 11, 2025, the Complainant signed an Administrative Citation, which was subsequently filed with the Clerk and served upon the Respondent on August 20, 2025.
- That subsequent to the service of the Administrative Citation, the Complainant learned that Tri-County Fair Association, Inc. has cleaned the property and is implementing controls to stop open dumping/burning.

WHEREFORE, the Complainant respectfully prays that an Order be entered dismissing these proceedings and all other relief as is deemed equitable and just.

Respectfully submitted,

County of LaSalle, Illinois, Complainant

By:

Jeremiah Adams, Assistant State's Attorney

JOSEPH R. NAVARRO
LASALLE COUNTY STATE'S ATTORNEY
JEREMIAH M. ADAMS
ASSISTANT LASALLE COUNTY STATE'S ATTORNEY
707 ETNA ROAD, SUITE 251
OTTAWA, IL 61350

TEL: (815) 434-8340

JADAMS@LASALLECOUNTYIL.GOV

ARDC: 6285605