BEFORE THE ILLINOIS POLLUTION CONTROL BOARD RECEIVED CLERK'S OFFICE PEOPLE OF THE STATE OF ILLINOIS, JUN 2 5 2003 Complainant, STATE OF ILLINOIS PCB 96-143 VS. Pollution Control Board (Environment-Water) MICHEL GRAIN COMPANY, INC., a/k/a MICHEL FERTILIZER, an Illinois corporation, CARYLE MICHEL, and RONNIE TODD. Respondents.

NOTICE OF FILING AFFIDAVIT

To: Ms. Dorothy M. Gunn

Clerk of the Board

Illinois Pollution Control Board 100 West Randolph Street

Suite 11-500

Chicago, IL 60601

Doug Antonik Antonik Law Offices

1921 Broadway P.O. Box 594

Mt. Vernon, IL 62864

Carol Sudman Hearing Officer

Illinois Pollution Control Board 600 South Second Street

Springfield, IL 62704

F. William Bonan

Bonan and Bonan and Rowland

P.O. Box 309

McLeansboro, IL 62859

PLEASE TAKE NOTICE that I have today served on the Respondents, Michel Grain Company, Inc., d/b/a Michel Fertilizer, Carlyle Michel, Ronnie Todd and Ronnie Todd Land Trust, the following discovery document in the above-referenced matter.

1. AFFIDAVIT regarding COMPLAINANT'S RESPONSES TO RONNIE TODD AND RONNIE TODD LAND TRUST'S REQUEST FOR PRODUCTION mailed May 22, 2003.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS LISA MADIGAN Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief

Environmental Enforcement/Asbestos

Litigation Division

ANGELA EATON HAMILTON

Assistant Attorney General Environmental Bureau

500 South Second Street Springfield, Illinois 62706 217/782-9031

Dated: June 20, 2003

CERTIFICATE OF SERVICE

I hereby certify that I did on June 20, 2003, send by First Class Mail, with postage thereon fully prepaid, by depositing in a United States Post Office Box true and correct copies of the following instrument entitled NOTICE OF FILING AFFIDAVIT

To:

Doug Antonik

Antonik Law Offices

1921 Broadway

P.O. Box 594

Mt. Vernon, IL 62864

F. William Bonan

Bonan and Bonan and Rowland

P.O. Box 309

McLeansboro, IL 62859

and the original and five copies by First Class Mail with postage thereon fully prepaid of the same foregoing instrument(s):

To:

Dorothy Gunn, Clerk

Illinois Pollution Control Board

State of Illinois Center

Suite 11-500

100 West Randolph Chicago, Illinois 60601

A copy was also sent by First Class Mail with postage thereon fully prepaid

To:

Carol Sudman

Hearing Officer

Pollution Control Board

600 South Second Street, Ste. 402

Springfield, Illinois 62704

Angelà Eaton Hamilton

Assistant Attorney General

This filing is submitted on recycled paper.

CLERK'S OFFICE

JUN 2 5 2003

Pollution Control Board

STATE OF ILLINOIS

AFFIDAVIT

I, ANGELA EATON HAMILTON, after being duly sworn and upon oath, state as follows:

1. I am the Assistant Attorney General representing the Complainant in People v. Michel Grain Company, Inc., a/k/a Michel Fertilizer, an Illinois corporation, Caryle Michel, Ronnie Todd and Ronnie Todd Land Trust, Pollution Control Board Case No. 96-143.

Complainant's Response to Respondents', Ronnie Todd and Ronnie Todd Land 2. Trust, Request for Production does represent full production of the documents requested. All documents that meet the description of the request that are presently in my control are provided herewith.

FURTHER, AFFIANT SAYETH NOT.

)SS

SUBSCRIBED AND SWORN to before me this \mathcal{A} day of

Notary Públic

STATE OF ILLINOIS

COUNTY OF SANGAMON

PEGGY J. POITEVINT NOTARY PUBLIC, STATE OF ILLINOIS MY COMMISSION EXPIRES 4-16-2006