

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

JAN 10 2005

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS,

Complainant,

vs.

JAMES ZELLER, THOMAS ZELLER, and
MATTHEW SHORT,

Respondents.

PCB No. 05-99
(Enforcement)

NOTICE OF FILING

To: Lisa Madigan
Office of the Attorney General
State of Illinois
500 South Second Street
Springfield, IL 62706

Matthew J. Dunn / Raymond Callery
Environmental Enforcement/Asbestos
Litigation Division
500 South Second Street
Springfield, IL 62706

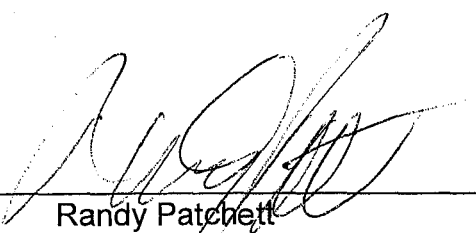
Stephen R. Green
Armstrong & Green
400 North Market Street
P.O. Box 1087
Marion, IL 62959

Brian D. Lewis
Law Office of Brian D. Lewis
411 1/2 North Court Street
Marion, IL 62959

PLEASE TAKE NOTICE that on this date I have mailed for filing with the Clerk of the Illinois Pollution Control Board of the State of Illinois, an Answer, a copy of which is attached hereto and herewith served upon you.

PATCHETT LAW OFFICE

By


Randy Patchett
ARDC No. 02151677

CERTIFICATE OF MAILING

The undersigned certifies that a copy of the above and foregoing instrument was mailed by depositing the same in a U.S. Post Office Box in the City of Marion, Illinois, postage fully prepaid and addressed to:

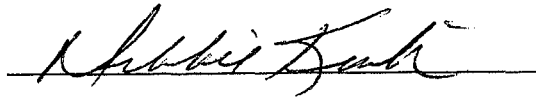
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Dated this 2nd day of January, 2005.



PATCHETT LAW OFFICE

104 West Calvert
P.O. Box 1176
Marion, IL 62959
Tele: 618-997-1984
Fax: 618-998-1495

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vs.)

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MATTHEW SHORT,)

Respondents.)


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ENTRY OF APPEARANCE

NOW COMES Patchett Law Office, by Randy Patchett, and hereby enters its appearance on behalf of MATTHEW SHORT, and requests that all further pleadings and/or notices be forwarded to this office.

Respectfully submitted,

PATCHETT LAW OFFICE

By 
Randy Patchett
ARDC No. 02151677

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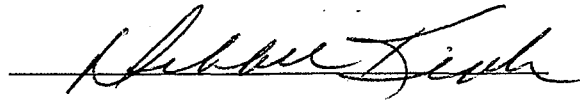
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Dated this 7th day of January, 2005.

A handwritten signature in cursive script, appearing to read "Brian D. Lewis", written over a horizontal line.

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Respondents.)

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ANSWER TO COMPLAINT

NOW COMES the Respondent, Matthew Short, by and through his attorneys,
Patchett Law Office, and for Answer to the Complaint filed herein states as follows:

COUNT I
NESHAP VIOLATIONS

1. Respondent admits the allegations contained in Paragraph 1 of Count I of
Complainant's Complaint.

2. Respondent admits the allegations contained in Paragraph 2 of Count I of
Complainant's Complaint.

3. Respondent admits the allegations contained in Paragraph 3 of Count I of
Complainant's Complaint.

4. Respondent neither admits or denies the allegations contained in
Paragraph 4 of Count I of Complainant's Complaint, but demands strict proof thereof.

5. Respondent admits the allegations contained in Paragraph 5 of Count I of
Complainant's Complaint.

6. Respondent admits the allegations contained in Paragraph 6 of Count I of
Complainant's Complaint.

7. Respondent denies the allegations contained in Paragraph 7 of Count I of Complainant's Complaint. The Respondent, Matthew Short, further specifically denies that the document when signed contained the language indicated in Paragraph 7 of Complainant's Complaint.

8. Respondent neither admits or denies the allegations contained in Paragraph 8 of Count 1 of Complainant's Complaint, but demands strict proof thereof.

9. Respondent admits the allegations contained in Paragraph 9 of Count I of Complainant's Complaint.

10. Respondent neither admits or denies the allegations contained in Paragraph 10 of Count I of Complainant's Complaint, but demands strict proof thereof.

11. Respondent neither admits or denies the allegations contained in Paragraph 11 of Count I of Complainant's Complaint, but demands strict proof thereof.

12. Respondent admits the allegations contained in Paragraph 12 of Count I of Complainant's Complaint.

13. Respondent admits the allegations contained in Paragraph 13 of Count I of Complainant's Complaint.

14. Respondent admits the allegations contained in Paragraph 14 of Count I of Complainant's Complaint.

15. Respondent admits the allegations contained in Paragraph 15 of Count I of Complainant's Complaint.

16. Respondent neither admits or denies the allegations contained in Paragraph 16 of Count I of Complainant's Complaint, but demands strict proof thereof.

17. Respondent neither admits or denies the allegations contained in

Paragraph 17 of Count I of Complainant's Complaint, but demands strict proof thereof.

18. Respondent neither admits or denies the allegations contained in Paragraph 18 of Count I of Complainant's Complaint, but demands strict proof thereof.

WHEREFORE, the Respondent, Matthew Short, requests this Board to enter an Order for the Respondent, Matthew Short.

COUNT II
WORK PRACTICES VIOLATIONS

1.-16. Respondent realleges and incorporates his answers to Paragraphs 1 through 16 of Count I of the Complaint as and for his answers to Paragraphs 1 through 16 of Count II of the Complaint.

17. Respondent neither admits or denies the allegations contained in Paragraph 17 of Count II of Complainant's Complaint, but demands strict proof thereof.

18. Respondent neither admits or denies the allegations contained in Paragraph 18 of Count II of Complainant's Complaint, but demands strict proof thereof.

19. (SIC) Respondent neither admits or denies the allegations contained in Paragraph 19 of Count II of Complainant's Complaint, but demands strict proof thereof.

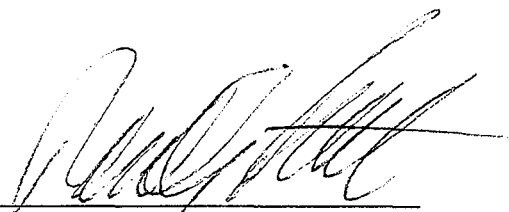
20. Respondent denies the allegations contained in Paragraph 20 of Count II of Complainant's Complaint as to Matthew Short.

21. Respondent denies the allegations contained in Paragraph 21 of Count II of Complainant's Complaint as to Matthew Short.

WHEREFORE, the Respondent, Matthew Short, requests this Board to enter an Order for the Respondent, Matthew Short.

PATCHETT LAW OFFICE

By


Randy Patchett
ARDC No. 02151677

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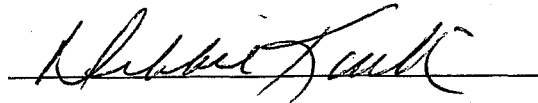
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