

- c. The COUNTY OF SANGAMON citation was issued solely for the improper purpose of interfering with the contract between Petitioner and Respondent, and providing a basis for Petitioner to not pay Respondent under the contract.
- d. The COUNTY OF SANGAMON failed to follow all necessary procedural requirements for issuing and serving an administrative citation, including but not limited to having failed to timely serve upon Respondent all statutorily-required information;
- e. The COUNTY OF SANGAMON is disqualified from pursuing this administrative citation action, and has a conflict of interest for the reasons expressed above and others;
- f. Respondent reserves the right to raise such other and further bases for review and reversal as such bases become known and apparent.

WHEREFORE, Respondent, PATRICK O'KEEFE, requests that this Board set this matter for a hearing regarding the administrative citation of COUNTY OF SANGAMON, and, after the hearing, enter an order reversing the decision of the COUNTY OF SANGAMON, dismissing this action, and entering full relief in favor of Respondent. Respondent further requests that this Board grant such other and further relief as this Board deems just and appropriate.

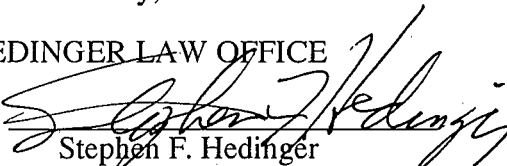
Respectfully submitted,

Patrick O'keefe,
Respondent,

By his attorney,

HEDINGER LAW OFFICE

By


Stephen F. Hedinger

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

COUNTY OF SANGAMON,)

Petitioner,)

v.)

PATRICK O'KEEFE,)

Respondent.)

AC 2005-051
ADMINISTRATIVE CITATION
SCDPH 05-AC-1

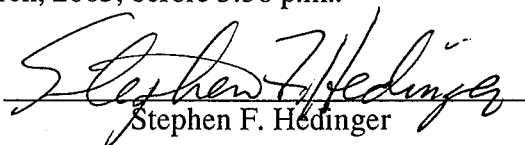
NOTICE OF FILING AND PROOF OF SERVICE

The undersigned certifies that an original and nine copies of Respondent's Petition for Review of Administrative Citation was served upon the Clerk of the Illinois Pollution Control Board, and one copy was served upon the following party of record in this cause by enclosing same in envelopes addressed to:

Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph St., Suite 11-500
Chicago, IL 60601

Sheri L. Carey
Assistant State's Attorney
Sangamon County
2501 North Dirksen Parkway
Springfield, IL 62702

with postage fully prepaid, and by depositing said envelopes in a U.S. Post Office Mail Box in Springfield, Illinois on the ~~4th~~ day of March, 2005, before 5:30 p.m..


Stephen F. Hedinger

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This Pleading is being submitted on recycled paper