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DEC 02 2005

STATE OF ILLINOIS  
Pollution Control Board

**OFFICE OF THE ATTORNEY GENERAL**  
STATE OF ILLINOIS

**Lisa Madigan**  
ATTORNEY GENERAL

November 30, 2005

The Honorable Dorothy Gunn  
Illinois Pollution Control Board  
James R. Thompson Center, Ste. 11-500  
100 West Randolph  
Chicago, Illinois 60601

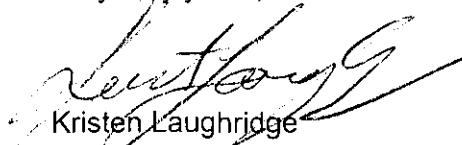
Re: ***People v. J & S Companies, Inc., et al.***  
**PCB 06-33**

Dear Clerk Gunn:

Enclosed for filing please find the original and ten copies of a Request for Admission of Fact Directed Towards J & S Companies, Inc., in regard to the above-captioned matter. Please file the original and return a file-stamped copy to me in the enclosed, self-addressed envelope.

Thank you for your cooperation and consideration.

Very truly yours,

  
Kristen Laughridge  
Environmental Bureau  
500 South Second Street  
Springfield, Illinois 62706  
(217) 782-9031

KL/pp  
Enclosures

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

**RECEIVED**  
CLERK'S OFFICE

DEC 02 2005

STATE OF ILLINOIS  
Pollution Control Board

PEOPLE OF THE STATE OF )  
ILLINOIS, )  
 )  
Complainant, )  
 )  
vs. )  
 )  
J & S COMPANIES, INC., a Missouri )  
corporation, and FIRST CHOICE )  
CONSTRUCTION, INC., an Illinois )  
corporation, )  
 )  
Respondents. )

PCB No. 06-33  
(Enforcement)

NOTICE OF FILING

To: J & S Companies, Inc.  
c/o C T Corporation System, R.A.  
208 S. LaSalle St., Ste. 814  
Chicago, IL 60604-1101

PLEASE TAKE NOTICE that on this date I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois, a REQUEST FOR ADMISSION OF FACT DIRECTED TOWARDS J & S COMPANIES, INC., a copy of which is attached hereto and herewith served upon you.

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

BY:   
KRISTEN LAUGHRIDGE  
Assistant Attorney General  
Environmental Bureau

500 South Second Street  
Springfield, Illinois 62706  
217/782-9031  
Dated: November 30, 2005

## CERTIFICATE OF SERVICE

I hereby certify that I did on July 11, 2005, send by First Class Mail, with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instruments entitled NOTICE OF FILING and REQUEST FOR ADMISSION OF FACT DIRECTED TOWARDS J & S COMPANIES, INC.:

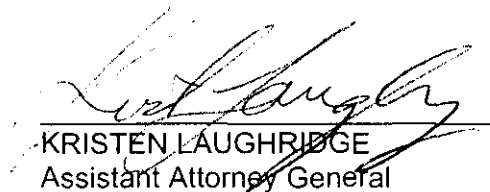
To: J & S Companies, Inc.  
c/o C T Corporation System, R.A.  
208 S. LaSalle St., Ste. 814  
Chicago, IL 60604-1101

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

To: Dorothy Gunn, Clerk  
Illinois Pollution Control Board  
James R. Thompson 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 Webb  
Hearing Officer  
Illinois Pollution Control Board  
1021 North Grand Avenue East  
Springfield, IL 62794



KRISTEN LAUGHRIDGE  
Assistant Attorney General

This filing is submitted on recycled paper.

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

**RECEIVED**  
CLERK'S OFFICE

DEC 02 2005

STATE OF ILLINOIS  
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS, )

Complainant, )

vs. )

No. PCB 06-33  
(Enforcement-Land)

J & S COMPANIES, INC., a Missouri )  
corporation, and FIRST CHOICE )  
CONSTRUCTION, INC., an Illinois )  
corporation, )

Respondent. )

**REQUEST FOR ADMISSION OF FACT DIRECTED**  
**TOWARDS J & S COMPANIES, INC.**

The PEOPLE OF THE STATE OF ILLINOIS, *ex rel.* LISA MADIGAN, Attorney General of the State of Illinois, pursuant to Supreme Court Rule 216 submits this request for the admission of the truth of the following specified relevant facts within 28 days after service hereof:

1. On February 6, 2003, J & S Companies, Inc. signed a contract with Board of Education-School District 189 for demolition of the Landsdowne Jr. High School located in East St. Louis, St. Clair County, Illinois.
2. In 2003, J & S Companies, Inc. demolished the Landsdowne Jr. High School.
3. J & S Companies, Inc. hired First Choice Construction, Inc. to haul the construction and demolition debris from the school demolition site.
4. Starting on or about February 6, 2003 until about December 3, 2003, First Choice Construction hauled approximately 92 truckloads of construction and demolition debris from the school demolition site to 7401 Bunkum Road, East St. Louis, St. Clair County, Illinois ("disposal site").

5. J & S Companies, Inc. knew that the construction and demolition debris from the school demolition site was disposed of at the demolition site.

6. The construction and demolition debris disposed at the disposal site consisted of brick, metal, plaster, paper, wood, pipe insulation, wire, and rebar.

7. The disposal site is not permitted by the Illinois Environmental Protection Agency (Illinois EPA) as a sanitary landfill.

Respectfully Submitted,

PEOPLE OF THE STATE OF ILLINOIS,  
*ex rel.* LISA MADIGAN,  
Attorney General of the State of Illinois

MATTHEW J. DUNN, Chief  
Environmental Enforcement/  
Asbestos Litigation Division

By: 

KRISTEN LAUGHRIDGE  
Assistant Attorney General  
Environmental Bureau

500 South Second Street  
Springfield, Illinois 62076  
217/782-9031  
Dated: