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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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MAR 14 2006

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS,)

Complainant,)

vs.)

PCB No. *06-104*
(Enforcement)

MOORE PAINTING CO., an Illinois)
corporation, and ILLINOIS-AMERICAN)

WATER COMPANY, an Illinois)
corporation,)

Respondents.)

ANSWER

COUNT I

Comes now, Respondent, MOORE PAINTING CO., an Illinois Corporation, by it's attorney, AMY SHOLAR, and for it's Answer to Count I of Complainant's Complaint states as follows:

1. Admit.
2. Admit.
3. Admit.
4. Admit.
5. Admit.
6. Neither admits nor denies and therefore demands strict proof thereof
7. Neither admits nor denies and therefore demands strict proof thereof
8. Deny.
9. Neither admits nor denies and therefore demands strict proof thereof.

10. Neither admits nor denies and therefore demands strict proof thereof.
11. Admit.
12. Admit that a follow-up inspection occurred, however, neither admit nor deny
13. Admit..
14. Admit.
15. Admit.
16. Admit.
17. Deny.
18. Deny.

WHEREFORE, Respondent, MOORE PAINTING CO., an Illinois Corporation, prays for judgment in it's favor and in bar of Count I of Complainant's Complaint.

COUNT II

Comes now, Respondent, MOORE PAINTING CO., an Illinois Corporation, by it's attorney, AMY SHOLAR, and for it's Answer to Count II of Complainant's Complaint states as follows:

- 1-13. Respondent repeats it's answers to paragraphs one through thirteen in Count I of Complainant's Complaint.
14. Admit.
15. Admit.
16. Admit.
17. Deny.
18. Deny.

WHEREFORE, Respondent, MOORE PAINTING CO, an Illinois Corporation, prays for judgment in it's favor and in bar of Count II of Complainant's Complaint.

COUNT III

Comes now, Respondent, MOORE PAINTING CO., an Illinois Corporation, by it's attorney, AMY SHOLAR, and for it's Answer to Count III of Complainant's Complaint states as follows:

- 1-13. Respondent repeats it's answers to paragraphs one through thirteen in Count I of Complainant's Complaint.
14. Admit.
15. Admit.
16. Admit.
17. Admit.
18. Admit.
19. Neither admits nor denies and therefore demands strict proof thereof.
20. Neither admits nor denies and therefore demands strict proof thereof.
21. Deny.
22. Deny.
23. Deny.

WHEREFORE, Respondent, MOORE PAINTING CO, an Illinois Corporation, prays for judgment in it's favor and in bar of Count III of Complainant's Complaint.

COUNT IV

Comes now, Respondent, MOORE PAINTING CO., an Illinois Corporation, by it's

attorney, AMY SHOLAR, and for it's Answer to Count IV of Complainant's Complaint states as follows:

1-13. Respondent repeats it's answers to paragraphs one through thirteen in Count I of Complainant's Complaint.

14. Admit.

15. Deny.

WHEREFORE, Respondent, MOORE PAINTING CO, an Illinois Corporation, prays for judgment in it's favor and in bar of Count IV of Complainant's Complaint.

COUNT V

Comes now, Respondent, MOORE PAINTING CO., an Illinois Corporation, by it's attorney, AMY SHOLAR, and for it's Answer to Count V of Complainant's Complaint states as follows:

1-13. Respondent repeats it's answers to paragraphs one through thirteen in Count I of Complainant's Complaint.

14. Admit.

15. Neither admits nor denies and therefore demands strict proof thereof.

16. Deny.

WHEREFORE, Respondent, MOORE PAINTING CO, an Illinois Corporation, prays for judgment in it's favor and in bar of Count V of Complainant's Complaint.

COUNT VI

Comes now, Respondent, MOORE PAINTING CO., an Illinois Corporation, by it's attorney, AMY SHOLAR, and for it's Answer to Count VI of Complainant's Complaint states as

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CERTIFICATE OF SERVICE

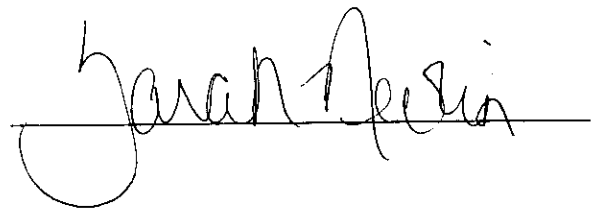
**STATE OF ILLINOIS
Pollution Control Board**

I hereby certify that I did on March 10, 2006, 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 ENTRY OF APPEARANCE.

To: ILLINOIS-AMERICAN WATER CO.
c/o CT Corporation System, R.A.
208 S. LaSalle Street, Suite 814
Chicago, IL 60604

PEOPLE OF THE STATE OF ILLINOIS
c/o J. L. Homan, Attorney General's Office
500 South Second Street
Springfield, IL 62706

DOROTHY GUNN, CLERK
Illinois Pollution Control Board
James R. Thompson Ctr., Ste, 11-500
100 West Randolph
Chicago, IL 60601

A handwritten signature in cursive script, appearing to read "Sarah Martin", is written over a horizontal line.

2010 State Street
Alton, IL 62002

The LAW OFFICE of
AMY SHOLAR, P. C.

Phone 618-208-3347
Fax 618-463-0989

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STATE OF ILLINOIS
Pollution Control Board

March 10, 2006

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

PCB06-104

Re: **People vs. Moore Painting Co. & Illinois-American Water Co.**

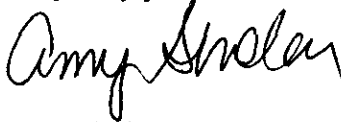
Dear Clerk Gunn:

Enclosed for filing please find an original and one copy of our Answer to Complainant's Complaint regarding above. I would ask that you return the copy to my in the enclosed self-addressed, postage paid envelope.

Copies have been forwarded to the attorney(s) and/or person(s) of record along with a Certificate of Service.

Thank you for your time and attention to this matter.

Very truly yours,



Amy Sholar

AS/sln
Enclosure