

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS)
By Lisa Madigan, Attorney General)
Of the State of Illinois,)
Complainant,)
vs.) PCB No. 2006-160
) (Enforcement-Water)
MATRIX NATIONAL INVESTMENT)
CORP., an Illinois corporation.)
Respondent.)

ANSWER TO COMPLAINT

MATRIX NATIONAL INVESTMENT CORP., an Illinois corporation, Respondent, by its President, Rick Hochman, and through its attorney, Donald G. Schweih, in support of its Answer to the said Complaint, state as follows:

COUNT I

1. Respondent admits the allegations of Paragraph 1.
2. Respondent admits the allegations of Paragraph 2.
3. Respondent admits the allegations of Paragraph 3.
4. Respondent admits the allegations of Paragraph 4.
5. Respondent denies the allegations of Paragraph 5.
6. Respondent denies the allegations of Paragraph 6.
7. Respondent denies the allegations of Paragraph 7.
8. Respondent denies the allegations of Paragraph 8.
9. Respondent denies the allegations of Paragraph 9.
10. Respondent denies the allegations of Paragraph 10.
11. Respondent denies the allegations of Paragraph 11.
12. Respondent denies the allegations of Paragraph 12.

13. Paragraph 13 is a statement of law requiring no answer.
14. Paragraph 14 is a statement of law requiring no answer.
15. Respondent admits the allegations of Paragraph 15.
16. Paragraph 16 is a statement of law requiring no answer.
17. Paragraph 17 is a statement of law requiring no answer.
18. Paragraph 18 is a statement of law requiring no answer.
19. Respondent denies the allegations of Paragraph 19.
20. Paragraph 20 is a statement of law requiring no answer.
21. Respondent denies the allegations of Paragraph 21.
22. Respondent denies the allegations of Paragraph 22.

COUNT II

- 1-20. Respondent reaffirms its answers by reference herein to the allegations of Count I as its answers to Paragraphs 1-20 of Count II.
21. Paragraph 21 is a statement of law requiring no answer.
22. Respondent denies the allegations of Paragraph 22.
23. Respondent denies the allegations of Paragraph 23.

COUNT III

- 1-19. Respondent reaffirms its answers by reference herein to the allegations of Count I as its answers to Paragraphs 1-19 of Count III.
20. Paragraph 20 is a statement of law requiring no answer.
- 21-25. Respondent states that the document speaks for itself.
26. Respondent denies the allegations of Paragraph 26.
27. Respondent denies the allegations of Paragraph 27.
28. Respondent denies the allegations of Paragraph 28.

29. Respondent denies the allegations of Paragraph 29.
30. Respondent denies the allegations of Paragraph 30.
31. Respondent denies the allegations of Paragraph 31.
32. Respondent denies the allegations of Paragraph 32.
33. Respondent denies the allegations of Paragraph 33.
34. Respondent denies the allegations of Paragraph 34.

WHEREFORE, Respondent requests that the Board enter judgement in favor of Respondent and against Complainant.

MATRIX NATIONAL INVESTMENT
CORP., an Illinois corporation, through its
attorney, Donald G. Schweih,

Donald G. Schweih
Attorney for Respondent
P.O. Box 6614
Galena, IL 61036
(815) 777-2614

VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct.

Rick Hochman, President,
MATRIX NATIONAL INVESTMENT
CORP., an Illinois corporation.