

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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SEP 25 2006

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS,)
)
 Plaintiff,)
)
 v.)
)
 RAY F. LANDERS, individually, and)
 EQUIPPING THE SAINTS MINISTRY,)
 INTERNATIONAL, INC., and Illinois)
 not-for-profit corporation,)
)
 Defendant.)

01-13
 No. PCB ~~06~~
 (Enforcement-Air)

ANSWER TO COMPLAINT


NOW COMES, RAY F. LANDERS and EQUIPPING THE SAINTS MINISTRY,
 INTERNATIONAL, INC., Defendants, by and through their attorneys, Brandenburg-Rees & Rees,
 and for their Answer to Complaint, respectfully states as follows:

1. The Defendant neither admits nor denies the allegations contained in Paragraph 1 of the Complaint, but demands strict proof thereof.
2. The Defendant neither admits nor denies the allegations contained in Paragraph 2 of the Complaint, but demands strict proof thereof.
3. The Defendant admits all of Paragraph 3 of the Complaint, except we deny that **the Cooperation is in good standing.**
4. The Defendant admits the allegations contained in Paragraph 4 of the Complaint.
5. The Defendant admits the allegations contained in Paragraph 5 of the Complaint.
6. The Defendant admits the allegations contained in Paragraph 6 of the Complaint.
7. The Defendant admits the allegations contained in Paragraph 7 of the Complaint.
8. The Defendant denies the allegations contained in Paragraph 8 of the Complaint.

9. The Defendant denies the allegations contained in Paragraph 9 of the Complaint.
10. The Defendant denies the allegations contained in Paragraph 10 of the Complaint.
11. The Defendant denies the allegations contained in Paragraph 11 of the Complaint.
12. The Defendant denies the allegations contained in Paragraph 12 of the Complaint.
13. The Defendant denies the allegations contained in Paragraph 13 of the Complaint.

WHEREFORE, Defendants, RAY F. LANDERS, EQUIPPING THE SAINTS
MINISTRY, INTERNATIONAL, INC., requests the Court to dismiss the Complaint and award
the Defendants their reasonable attorney's fees and costs incurred in defending this action.

RAY F. LANDERS, EQUIPPING THE
SAINTS MINISTRY, INTERNATIONAL,
INC., Defendants

BY: 
One of Her Attorneys

EDMOND H. REES
Reg. No. 02301008
BRANDENBURG-REES & REES
Attorneys at Law
128 South Broad Street
Post Office Box 556
Carlinville, IL 62626-0556
217-854-2602

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the foregoing was served upon the following by enclosing the same in an envelope addressed as follows:

J.L. Homan
Environmental Bureau
500 South Second Street
Springfield, IL 62706

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

Said envelope, addressed as set out above, containing a copy of the foregoing instrument was deposited in a United States Post Office receptacle in the City of Carlinville, Illinois, with postage fully prepaid, on the 22nd day of September, 2006.

