

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ADMINISTRATIVE CITATION

ILLINOIS ENVIRONMENTAL)
 PROTECTION AGENCY)
)
 Complainant,)
)
 V.)
)
 GORDON INVESTMENT GROUP, LLC,)
)
 Respondents.)

AC 09-44

(IEPA No. 80-09-AC)
RECEIVED
 CLERK'S OFFICE
 JUN 12 2009
 STATE OF ILLINOIS
 Pollution Control Board

NOTICE OF FILING

ORIGINAL

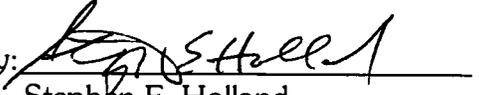
To: Clerk
 Illinois Pollution Control Board
 James R. Thompson Center
 100 W. Randolph Street, Suite 11-500
 Chicago, IL 60601

Illinois Environmental Protection Agency
 Attn: Division of Legal Counsel
 1021 North Grand Avenue East
 PO Box 19276
 Springfield, IL 62794-9276

PLEASE TAKE NOTICE that on this date I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois the following instrument entitled PETITION FOR REVIEW.

Respectfully submitted,

Holland and Holland

By: 
 Stephen E. Holland
 Attorney for Respondent

Stephen E. Holland
 Holland and Holland
 Attorney for the Respondents
 397 West Main Street
 Bushnell, IL 61422
 309-772-3178
 Fax: 309-772-2085

Dated: June 10, 2009

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
ADMINISTRATIVE CITATION

RECEIVED
CLERK'S OFFICE

JUN 12 2009

STATE OF ILLINOIS
Pollution Control Board

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY)

Complainant,)

v.)

GORDON INVESTMENT GROUP, LLC,)

Respondents,)

AC 0944
(IEPA No. 80-09-AC)

ORIGINAL

NOTICE AND ENTRY OF APPEARANCE

Now comes HOLLAND AND HOLLAND, attorney for the Respondent, Gordon Investment Group, LLC in the above entitled cause, and enters their appearance as attorneys of record for the Respondent herein.

Dated: June 10, 2009

HOLLAND AND HOLLAND

By: 
Stephen E. Holland
Attorney for Respondent

Stephen E. Holland
Holland and Holland
Attorney for the Respondents
397 West Main Street
Bushnell, IL 61422
309-772-3178
Fax: 309-772-2085

HOLLAND
AND HOLLAND
ATTORNEYS AT LAW
397 WEST MAIN
P.O. BOX 298

BUSHNELL, ILLINOIS 61422
TELEPHONE: 309 772-3178

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
ADMINISTRATIVE CITATION

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY)
)
Complainant,)
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v.)
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GORDON INVESTMENT GROUP, LLC,)
)
Respondents,)

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(IEPA No. 80-09-AC)

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JUN 12 2009

STATE OF ILLINOIS
Pollution Control Board

ORIGINAL

PETITION FOR REVIEW

Now comes Gordon Investment Group, LLC, by its attorney Stephen E. Holland, and
Petition the agency to review the Administrative Citation filed herein on May 6, 2009, and in
support thereof, state:

1. They admit the allegations of paragraph 1;
2. They deny the allegations of paragraph 2 and specifically state that they were not
operating an open dump at said premises;
3. They admit the allegations of paragraph 3 in that they own the said premises.
4. They neither admit nor deny the allegation of paragraph 4.
5. They admit the allegation of paragraph 5.

In addition thereto, they specifically deny that the Respondents caused or allowed the
open dumping of waste in a manner resulting in litter in violation of 415 ILCS 5/21(p)(1). They
further deny the intentional burning of mobile home materials at the site as they were salvaging
the mobile homes as they were being torn down, as noted to be in violation of 415 ILCS
5/21(p)(3). They further deny that the Respondents caused or allowed the open dumping of
waste in a manner resulting in deposition of general construction or demolition debris in

violation of 415 ILCS 5/21(p)(7). The grounds were continually cleaned as materials were disposed of at a local legal dump site.

Dated this 10th day of June, 2009.

Gordon Investment Group, LLC

By: 
Stephen E. Holland, their attorney

Stephen E. Holland
Holland and Holland
Attorney for the Respondents
397 West Main Street
Bushnell, IL 61422
309-772-3178
Fax: 309-772-2085

**CERTIFICATE AND
PROOF OF SERVICE**

ORIGINAL

I certify that on June 10, 2009, the foregoing instrument was served upon the following by depositing a copy thereof in the U.S. Mail, postage prepaid, in envelopes addressed to the following:

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

RECEIVED
CLERK'S OFFICE
JUN 11 2009
STATE OF ILLINOIS
Pollution Control Board

Illinois Environmental Protection Agency
Attn: Division of Legal Counsel
1021 North Grand Avenue East
PO Box 19276
Springfield, IL 62794-9276

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JUN 12 2009
STATE OF ILLINOIS
Pollution Control Board

Holland and Holland
Attorneys at Law

397 WEST MAIN STREET
P.O. Box 298

BUSHNELL, ILLINOIS 61422-0298
309/772-3178

STEPHEN E. HOLLAND
BRIAN P. HOLLAND

FAX NUMBER: 309/772-2085
EMAIL: hollholl@logonix.net

RECEIVED
CLERK'S OFFICE
JUN 12 2009
STATE OF ILLINOIS
Pollution Control Board

ORIGINAL

June 10, 2009

VIA: CERTIFIED MAIL/RETURN RECEIPT

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

Illinois Environmental Protection Agency
Attn: Division of Legal Counsel
1021 North Grand Avenue East
PO Box 19276
Springfield, IL 62794-9276

Ac09-44

RE: IEPA v. Gordon Investment Group, LLC
IEPA No. 80-09-AC

Dear Sir:

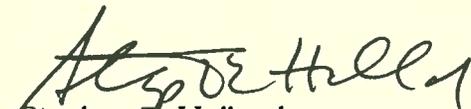
On behalf of Gordon Investment Group, LLC, I am forwarding to the Illinois Pollution Control Board a Petition for Review of the above captioned matter along with the Notice of Filing, Certificate of Service, and Notice of Appearance and nine duplicate copies.

I am also forwarding a copy of the Petition for Review with the Notice of Filing, Certificate of Service, and Notice of Appearance to the Illinois Environmental Protection Agency.

Please let me know if you have any questions.

Sincerely,

HOLLAND AND HOLLAND


Stephen E. Holland

SEH:ksg
Enclosures

cc: Rod Gordon