

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
(ADMINISTRATIVE CITATION)**

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY)
Complainant,)
)
v.)
)
MICHAEL CRANK, individually and d/b/a)
CRANK TREE SERVICE)
Respondents.)

AC-2018-11
(IEPA No. 33-18-AC)

I, the undersigned, authorize the service of documents on me by e-mail in lieu of receiving paper documents in the above-captioned proceeding. My e-mail address to receive service is as follows: jonturpin13@gmail.com.


Jonathan Turpin Esq.

Jonathan Turpin Esq.
Turpin & Ghibaudy, Attorneys at Law
P.O. Box 610
Carmi, IL 62821
(618) 383-2596
jonturpin13@gmail.com
ARDC: 6314167

Dated April 23, 2018

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
(ADMINISTRATIVE CITATION)**

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY)
Complainant,)
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v.)
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MICHAEL CRANK, individually and d/b/a)
CRANK TREE SERVICE)
Respondents.)

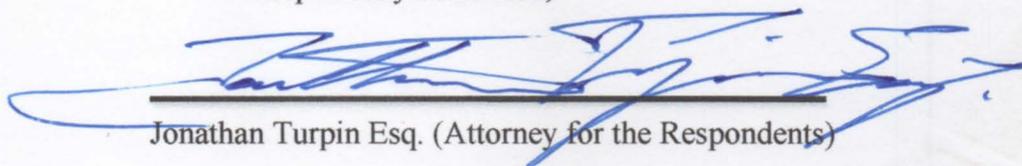
AC 2018- //
(IEPA No. 33-18-AC)

NOTICE OF FILING

TO:
Michelle M. Ryan
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

PLEASE TAKE NOTICE that on this date I electronically filed with the Clerk of the Illinois Pollution Control Board of the State of Illinois the following Instrument(s) entitled (1) Entry of Appearance (2) Petition To Contest Administrative Citation, (3) Certificate of E-mail Service, (4) Consent to Email Service

Respectfully submitted,


Jonathan Turpin Esq. (Attorney for the Respondents)

Jonathan Turpin Esq.
Turpin & Ghibaudy, Attorneys at Law
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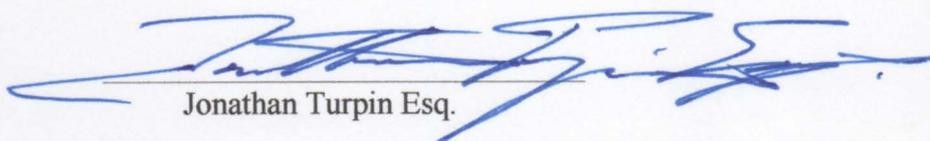
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CRANK TREE SERVICE)	
Respondents.)	

ENTRY OF APPEARANCE

I hereby file my appearance in this proceeding, on behalf of Michael Crank and Crank Tree Service the named respondents herein.


Jonathan Turpin Esq.

4/23/2018

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AC 2018- //
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PETITION TO CONTEST ADMINISTRATIVE CITATION

Now comes Michael Crank, individually and in his capacity as the proprietor of Crank Tree Service, and in support of his Petition to Contest Administrative Citation states as follows:

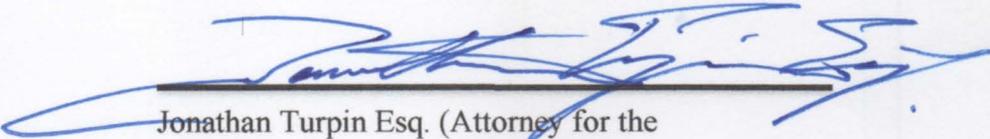
1. The Respondents admit the allegations in Paragraph One (1) of the Administrative Citation.
2. The Respondents deny the allegations in Paragraph Two (2) of the Administrative Citation.
3. The Respondents admit the allegations contained in Paragraph Three (3) of the Administrative Citation insomuch as an admission that Michael Crank is responsible for the upkeep and operations of the facility known as Crank Tree Service.
4. The Respondent admits the allegations contained in Paragraph Four (4) of the Administrative Citation.
5. The Respondent lacks sufficient knowledge of the acts of the Agency to either admit or deny the allegation contained in Paragraph Five of the Administrative Citation.

6. That the Respondents deny the alleged violation contained in the portion of the Administrative citation labeled "violations (1)."
7. That the Respondents deny the alleged violation contained in the portion of the Administrative citation labeled "violations (2)."
8. That the Respondents deny the alleged violation contained in the portion of the Administrative citation labeled "violations (3)."

WHEREFORE, Michael Crank and Cranks Tree Service, the named Respondents in this Cause respectfully request a hearing of the allegations, before the Board, as to all allegations contained in the Administrative citation not herein specifically denied herein, and for any and all other appropriate relief to do justice among the Parties hereto.

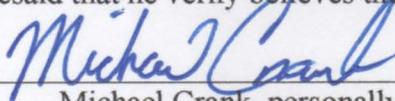
Respectfully submitted,

Respondents)


Jonathan Turpin Esq. (Attorney for the

VERIFICATION OF CERTIFICATION

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, except at to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.


Michael Crank, personally
and on behalf of Crank Tree Service

Jonathan Turpin Esq.
Turpin & Ghibaudy, Attorneys at Law
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CRANK TREE SERVICE)	
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CERTIFICATE OF E-MAIL SERVICE

I, the undersigned, affirm:

That I have served the attached the following persons by e-mail upon the following persons; (1) Michelle Ryan at **michelle.ryan@illinois.gov**; and (2) Don Brown at **don.brown@illinois.gov**

That the documents served were: (1) Petition to Contest Administrative Citation, (2) Respondent's Counsel's Entry of Appearance, (3) Notice of Filing, (4) Consent to E-mail Service, (5) Certificate of E-mail Service.

That my e-mail address is **jonturpin13@gmail.com**.

That the number of pages in the e-mail transmission is ____.

That the e-mail transmission took place before 5:00 p.m. on the date of April 24, 2018.


Jonathan Turpin Esq.

Jonathan Turpin Esq.
Turpin & Ghibaudy, Attorneys at Law
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Dated April 23, 2018