

STATE OF ILLINOIS
POLLUTION CONTROL BOARD
JAMES R. THOMPSON CENTER
100 W RANDHLPH STREET, SUITE 11-500
CHICAGO IL 60601

MAURICE WHISENHUNT)
)
 Complainant,)
Vs) PCB 14-34
)
JEFF MOORE)
)
 Respondent.)

ANSWER TO COMPLAINT

Now comes, JEFF MOORE, by and through his attorney, Robert C. Wilson of the Law Office of Robert C. Wilson and in Response to the Complaint filed herein by MAURICE WHISENHUT in this cause states as follows:

1. The Respondent admits the allegation of Paragraph 1 of the Complaint that Maurice Whisenhunt resides at 16147 E. Saddle Club Road, Bonnie, Illinois.
2. The Respondent has no knowledge as to where Maurice Whisenhunt works and therefore neither admits nor denies the allegations in Paragraph 2 of the Complaint.
3. The Respondent Jeff Moore admits the allegation of Paragraph 3 of the Complaint that he lives at 16325 East Saddle Club Road, Bonnie, Illinois.
4. The Respondent admits the allegation of Paragraph 4 of the Complaint that he operates a farm and that on the farm he utilizes certain grain bins with dryers.
5. The Respondent denies the allegation of Paragraph 5 of the Complaint that there have been any violations of Title VI, Section 23 with respect to noise.
6. The Respondent denies the allegation of Paragraph 6 of the Complaint alleging noise pollution by virtue of two dryers facing to the west.

7. The Respondent denies the frequency is very high, admits that the grain dryers run in the fall of the year, and denies all of the other allegations of Paragraph 7 of the Complaint.
8. The Respondent denies the allegations of Paragraph 8 of the Complaint.
9. In Respondent to Paragraph 9 of the Complaint, the Respondent denies that it is necessary to change Respondent's operations and to move the dryers.
10. The Respondent has no knowledge of the allegations of Paragraph 10 of the Complaint and therefore neither admits nor denies the same.
11. The Respondent will be represented by Robert C. Wilson, an attorney licensed to practice law in the State of Illinois.
12. The Respondent denies all of the other allegations of the Complaint.



Robert C. Wilson
Attorney for Jeff Moore

Prepared by:
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CERTIFICATE OF SERVICE

I, the undersigned, on oath or affirmation, state that on December 9, 2013, I served the attached Answer to Complaint and Notice of the Complainant by registered mail (a copy of the receipt is attached) at the address below:

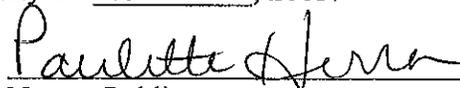
Complainant's Address:

Maurice R. Whisenhunt
16147 East Saddle Club Road
Bonnie, IL 62816



Robert C. Wilson

Signed and sworn to before me this 9 day of Dec., 2013.



Notary Public

