

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
by KWAME RAOUL, Attorney General)	
of the State of Illinois,)	
)	
Complainant,)	
)	
v.)	PCB NO. 23-
)	(Enforcement – Land)
)	
WILLIAM M. LONGWELL, an individual,)	
)	
Respondent.)	

NOTICE OF FILING

TO: See attached service list (VIA ELECTRONIC FILING)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing the following Complaint, a copy of which is attached and hereby served upon you. **You may be required to answer the charges of the Complaint at a hearing before the Board, at a date set by the Board.**

Failure to file an answer to this complaint within 60 days may have severe consequences. Failure to answer will mean that all allegations in the complaint will be taken as if admitted for purposes of this proceeding. If you have any questions about this procedure, you should contact the hearing officer assigned to this proceeding, the clerk's office, or an attorney.

NOTIFICATION - YOU ARE HEREBY NOTIFIED that financing may be available through the Illinois Environmental Facilities Financing Act [20 ILCS 3515/1, et seq.] to correct the alleged violations.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,
KWAME RAOUL, Attorney General of the State of
Illinois

By: /s/ Raymond J. Callery
Raymond J. Callery
ARDC# 6193579
Assistant Attorney General
500 South Second Street
Springfield, Illinois 62706
217/782-9031
raymond.callery@ilag.gov
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Dated: October 26, 2022

Service List

For the Respondent

William Longwell
301 South 24th Street
Herrin, IL 62948
(via personal service)

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
by KWAME RAOUL, Attorney General)	
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WILLIAM M. LONGWELL, an individual,)	
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Respondent.)	

COMPLAINT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, complains of the Respondent, WILLIAM M. LONGWELL, an individual, as follows:

COUNT I
OPEN DUMPING

1. This Count is brought by the Attorney General on his own motion and at the request of the Illinois Environmental Protection Agency (“Illinois EPA”), pursuant to the terms and provisions of Section 31 of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/31 (2020), against Respondent, WILLIAM M. LONGWELL, an individual.

2. The Illinois EPA is an agency of the State of Illinois created by the Illinois General Assembly under Section 4 of the Act, 415 ILCS 5/4 (2020), and charged, *inter alia*, with the duty of enforcing the Act in proceedings before the Illinois Pollution Control Board.

3. The Illinois Pollution Control Board (“Board”) is an independent board created by the General Assembly in Section 5 of the Act, 415 ILCS 5/5 (2020), and charged, *inter alia*, with the duty of determining standards and adopting regulations.

4. This Count is brought after providing Respondent with notice and the opportunity for a meeting with the Illinois EPA, pursuant to Section 31 of the Act, 415 ILCS 5/31 (2020).

5. Respondent currently resides at 301 South 24th Street, Herrin, Illinois 62948.

6. Respondent was licensed in Illinois as an Asbestos Supervisor (#100-19127) and advertised asbestos abatement services on Facebook as “Longwell Abatement” and “Mike’s Removal.” Neither business is a registered legal entity authorized to do business in the State of Illinois.

7. On May 10, 2019, Respondent contracted with Nancy Rowold to remove vermiculite insulation from the attic of the Rowold residence located at 412 South 17th Street, Herrin, Illinois. On that day, Respondent removed at least four pick-up truck loads of waste from the Rowold residence.

8. Respondent transported asbestos containing waste (“ACW”) and other waste removed from the Rowold residence to a residence located at 16597 Dublin Road, West Frankfort, Williamson County, Illinois (the “West Frankfort Property”) and disposed of it there. Respondent had formerly leased the West Frankfort Property but was evicted by the owner in October 2019.

9. On October 3, 2019, Illinois EPA inspected the West Frankfort Property. Near the entrance, there were numerous clear bags that were taped shut and labeled “ACW”. The bags appeared to contain household waste and landscape waste. Also observed was a burn pit containing food, beverage bottles and cans, general refuse and furniture.

10. In the northwest portion of the West Frankfort Property, in an area adjacent to a storage shed, was a second accumulation of clear bags labeled “ACW.” The bags, all taped shut, were in a pile estimated to measure four yards by four yards by one yard in volume. These bags contained general construction or demolition debris which was suspected to be ACW.

11. On March 11, 2020, Illinois EPA submitted the bag waste labeled "ACW" for sampling. There were two types of ACW. Most of the bags contained vermiculite insulation (Sample X201) and some bags contained vinyl flooring (Sample X202). On March 20, 2020, Illinois EPA received the results of the sampling. Sample X201 contained 90 to 100% vermiculite insulation and tested positive for tremolite asbestos. Sample X202 did not contain asbestos.

12. Asbestos is a known carcinogen with no safe level of exposure.

13. The results of the sampling were provided to the owner of the West Frankfort Property, Emmaline Duke. Ms. Duke hired a company to remove the waste and properly dispose of it at the West End Landfill. A total of 0.87 tons of ACW from the West Frankfort Property was received at the West End Landfill.

14. Sections 3.160(a), 3.185, 3.205, 3.300, 3.305, 3.385, 3.445, and 3.535 of the Act, 415 ILCS 5/3.160(a), 3.185, 3.205, 3.300, 3.305, 3.385, 3.445, and 3.535 (2020), respectively, provide the following definitions:

"General construction or demolition debris" means non-hazardous, uncontaminated materials resulting from the construction, remodeling, repair, and demolition of utilities, structures, and roads, limited to the following: bricks, concrete, and other masonry materials; soil; rock; wood, including non-hazardous painted, treated, and coated wood and wood products; wall coverings; plaster; drywall; plumbing fixtures; non-asbestos insulation; roofing shingles and other roof coverings; reclaimed or other asphalt pavement; glass; plastics that are not sealed in a manner that conceals waste; electrical wiring and components containing no hazardous substances; and corrugated cardboard, piping or metals incidental to any of those materials.

"Disposal" means the discharge, deposit, injection, dumping, spilling, leaking or placing of any waste or hazardous waste into or on any land or water or into any well so that such waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.

"Generator" means any person whose act or process produces waste.

“Open burning” is the combustion of any matter in the open or in an open dump.

“Open dumping” means the consolidation of refuse from one or more sources at a disposal site that does not fulfill the requirements of a sanitary landfill.

“Refuse” means waste.

“Sanitary landfill” means a facility permitted by the Agency for the disposal of waste on land

“Waste” means any garbage, sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility or other discarded material, including solid, liquid, semi-solid, or contained gaseous material resulting from industrial, commercial, mining and agricultural operations, and from community activities

15. The ACW, household waste, landscape waste, food, beverage bottles and cans, general refuse and furniture that Respondent deposited at the West Frankfort Property were “waste” and “refuse” as those terms are defined in Sections 3.385 and 3.535 of the Act, 415 ILCS 5/3.385 and 3.535 (2020).

16. Respondent deposited the aforesaid waste on the land at the West Frankfort Property in a manner so that the waste or constituents thereof could enter the environment or be emitted into the air or discharged into water, including ground waters, such that the waste was disposed of as that term is defined in Section 3.185 of the Act, 415 ILCS 5/3.185 (2020).

17. Section 21(a) of the Act, 415 ILCS 5/21(a) (2020), provides, in pertinent part, as follows:

No person shall:

(a) Cause or allow the open dumping of any waste.

* * *

18. By consolidating ACW, household waste, landscape waste, beverage bottles and cans, general refuse and furniture on the ground at the West Frankfort Property, Respondent caused or allowed the open dumping of waste.

19. By causing or allowing the open dumping of waste at the West Frankfort Property, Respondent violated Section 21(a) of the Act, 415 ILCS 5/21(a) (2020).

PRAYER FOR RELIEF

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order in favor of the Complainant and against the Respondent, WILLIAM M. LONGWELL, for the following relief:

A. Authorizing a hearing in this matter at which time the Respondent will be required to answer the allegations herein;

B. Finding that the Respondent has violated Section 21(a) of the Act, 415 ILCS 5/21(a) (2020);

C. Ordering the Respondent to cease and desist from any further violations of Section 21(a) of the Act, 415 ILCS 5/21(a) (2020);

D. Pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2020), assessing against the Respondent a civil penalty of \$50,000.00 for each violation of the Act, and an additional civil penalty of \$10,000.00 for each day each violation continued;

E. Ordering the Respondent to pay all costs, including expert witness, consultant and attorney fees, expended by the State in pursuit of this action; and

F. Ordering such other and further relief as the Board deems appropriate and just.

COUNT II
CONDUCTING A WASTE-DISPOSAL OPERATION WITHOUT A PERMIT

1-16. Complainant realleges and incorporates herein by reference paragraphs 1 through 16 of Count I as and for paragraphs 1 through 16 of this Count II.

17. Section 21(d)(1) of the Act, 415 ILCS 5/21(d)(1), provides, in pertinent part, as follows:

No person shall:

- (d) Conduct any waste-storage, waste-treatment, or waste-disposal operation:
 - (1) without a permit granted by the Agency or in violation of any conditions imposed by such permit, including periodic reports and full access to adequate records and the inspection of facilities, as may be necessary to assure compliance with this Act and with regulations and standards adopted thereunder; . . .

* * *

18. Respondent had no permit issued by Illinois EPA to operate a waste-disposal operation at the West Frankfort Property.

19. By conducting a waste-disposal operation at the West Frankfort Property without a permit issued by Illinois EPA, Respondent violated Section 21(d)(1) of the Act, 415 ILCS 5/21(d)(1) (2020).

PRAYER FOR RELIEF

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order in favor of the Complainant and against the Respondent, WILLIAM M. LONGWELL, for the following relief:

A. Authorizing a hearing in this matter at which time the Respondent will be required to answer the allegations herein;

B. Finding that the Respondent has violated Section 21(d)(1) of the Act, 415 ILCS 5/21(d)(1) (2020);

C. Ordering the Respondent to cease and desist from any further violations of Section 21(d)(1) of the Act, 415 ILCS 5/21(d)(1) (2020);

D. Pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2020), assessing against the Respondent a civil penalty of \$50,000.00 for each violation of the Act, and an additional civil penalty of \$10,000.00 for each day each violation continued;

E. Ordering the Respondent to pay all costs, including expert witness, consultant and attorney fees, expended by the State in pursuit of this action; and

F. Ordering such other and further relief as the Board deems appropriate and just.

COUNT III
CONDUCTING A WASTE DISPOSAL OPERATION
AT A SITE NOT MEETING THE REQUIREMENTS OF THE ACT

1-22. Complainant realleges and incorporates herein by reference paragraphs 1 through 19 of Count I and paragraphs 17 through 19 of Count II as and for paragraphs 1 through 22 of this Count III.

23. Section 21(e) of the Act, 415 ILCS 5/21(e) (2020), provides as follows:

No person shall:

- (e) Dispose, treat, store or abandon any waste, or transport any waste into this State for disposal, treatment, storage or abandonment, except at a site or facility which meets the requirements of this Act and of regulations and standards thereunder.

24. By disposing of waste at the West Frankfort Property, a site that did not meet the requirements of the Act and Board Regulations for disposal of waste, Respondent violated Section 21(e) of the Act, 415 ILCS 5/21(e) (2020).

PRAYER FOR RELIEF

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order in favor of the Complainant and against the Respondent, WILLIAM M. LONGWELL, for the following relief:

A. Authorizing a hearing in this matter at which time the Respondent will be required to answer the allegations herein;

B. Finding that the Respondent has violated Section 21(e) of the Act, 415 ILCS 5/21(e) (2020);

C. Ordering the Respondent to cease and desist from any further violations of Section 21(e) of the Act, 415 ILCS 5/21(e) (2020);

D. Pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2020), assessing against the Respondent a civil penalty of \$50,000.00 for each violation of the Act, and an additional civil penalty of \$10,000.00 for each day each violation continued;

E. Ordering the Respondent to pay all costs, including expert witness, consultant and attorney fees, expended by the State in pursuit of this action; and

F. Ordering such other and further relief as the Board deems appropriate and just.

COUNT IV
OPEN DUMPING RESULTING IN LITTER

1-19. Complainant realleges and incorporates herein by reference paragraphs 1 through 19 of Count I as and for paragraphs 1 through 19 of this Count IV.

20. Section 21(p)(1), (p)(3) and 21(p)(7) of the Act, 415 ILCS 5/21(p)(1), (p)(3) and (p)(7) (2020), provides, in pertinent part, as follows:

No person shall:

(p) In violation of subdivision (a) of this Section, cause or allow the open dumping of any waste in a manner which results in any of the following occurrences at the dump site:

(1) litter;

* * *

(3) open burning:

* * *

(7) deposition of:

(i) general construction or demolition debris as defined in Section 3.160(a) of this Act;

* * *

21. Section 3(a) of the Litter Control Act, 415 ILCS 105/3(a) (2020), defines "litter" as follows:

"Litter" means any discarded, used or unconsumed substance or waste. "Litter" may include, but is not limited to, any garbage, trash, refuse, cigarettes, debris, rubbish, grass clippings or other lawn or garden waste, newspaper, magazines, glass, metal, plastic or paper containers or other packaging construction material, abandoned vehicle (as defined in the Illinois Vehicle Code), motor vehicle parts, furniture, oil, carcass of a dead animal, any nauseous or offensive matter of any kind, any object likely to injure any person or create a traffic hazard, potentially infectious medical waste as defined in Section 3.360 of the Environmental Protection Act, or anything else of an unsightly or unsanitary nature, which has been discarded, abandoned or otherwise disposed of improperly.

22. The household waste, landscaping waste, food, beverage bottles and cans, general refuse and furniture transported to and disposed of at the West Frankfort Property by Respondent

met the definition of "litter" as defined by Section 3(a) of the Litter Control Act, 415 ILCS 105/3(a) (2020)

23. By causing or allowing the open dumping of waste in a manner which resulted in litter at the dump site, Respondent violated Section 21(p)(1) of the Act, 415 ILCS 5/21(p)(1) (2020).

PRAYER FOR RELIEF

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order in favor of the Complainant and against the Respondent, WILLIAM M. LONGWELL, for the following relief:

A. Authorizing a hearing in this matter at which time the Respondent will be required to answer the allegations herein;

B. Finding that the Respondent has violated Section 21(p)(1) of the Act, 415 ILCS 5/21(p)(1) (2020);

C. Ordering the Respondent to cease and desist from any further violations of Section 21(p)(1) of the Act, 415 ILCS 5/21(p)(1) (2020);

D. Pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2020), assessing against the Respondent a civil penalty of \$50,000.00 for each violation of the Act, and an additional civil penalty of \$10,000.00 for each day each violation continued;

E. Ordering the Respondent to pay all costs, including expert witness, consultant and attorney fees, expended by the State in pursuit of this action; and

F. Ordering such other and further relief as the Board deems appropriate and just.

COUNT V
OPEN DUMPING RESULTING IN OPEN BURNING

1-19. Complainant realleges and incorporates herein by reference paragraphs 1 through 19 of Count I as and for paragraphs 1 through 19 of this Count V.

20. Complainant realleges and incorporates herein by reference paragraph 17 of Count IV as and for paragraph 17 of this Count V.

21. An open burning pit was observed at the West Frankfort Property where Respondent had burned food, beverage bottles and cans, general refuse and furniture.

22. By causing or allowing the open dumping of waste in a manner which resulted in open burning at the dump site, Respondent violated Section 21(p)(3) of the Act, 415 ILCS 5/21(p)(3) (2020).

PRAYER FOR RELIEF

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order in favor of the Complainant and against the Respondent, WILLIAM M. LONGWELL, for the following relief:

A. Authorizing a hearing in this matter at which time the Respondent will be required to answer the allegations herein;

B. Finding that the Respondent has violated Section 21(p)(3) of the Act, 415 ILCS 5/21(p)(3) (2020);

C. Ordering the Respondent to cease and desist from any further violations of Section 21(p)(3) of the Act, 415 ILCS 5/21(p)(3) (2020);

D. Pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2020), assessing against the Respondent a civil penalty of \$50,000.00 for each violation of the Act, and an additional civil penalty of \$10,000.00 for each day each violation continued;

E. Ordering the Respondent to pay all costs, including expert witness, consultant and attorney fees, expended by the State in pursuit of this action; and

F. Ordering such other and further relief as the Board deems appropriate and just.

COUNT VI
OPEN DUMPING RESULTING IN THE DEPOSITION
OF GENERAL CONSTRUCTION OR DEMOLITION DEBRIS

1-19. Complainant realleges and incorporates herein by reference paragraphs 1 through 19 of Count I as and for paragraphs 1 through 19 of this Count VI.

20. Complainant realleges and incorporates herein by reference paragraph 20 of Count IV as and for paragraph 20 of this Count VI.

21. The ACW that Respondent transported to and deposited at the West Frankfort Property met the definition of "general construction or demolition debris" as defined by Section 3.160(a) of the Act, 415 ILCS 5/3.160(a) (2020).

22. By causing or allowing the open dumping of waste in a manner which resulted in the deposition of general construction or demolition debris at the dump site, Respondent violated Section 21(p)(7)(i) of the Act, 415 ILCS 5/21(p)(7)(i) (2020).

PRAYER FOR RELIEF

WHEREFORE, Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order in favor of the Complainant and against the Respondent, WILLIAM M. LONGWELL, for the following relief:

A. Authorizing a hearing in this matter at which time the Respondent will be required to answer the allegations herein;

B. Finding that the Respondent has violated Section 21(p)(7)(i) of the Act, 415 ILCS 5/21(p)(7)(i) (2020);

C. Ordering the Respondent to cease and desist from any further violations of Section 21(p)(7)(i) of the Act, 415 ILCS 5/21(p)(7)(i) (2020);

D. Pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2020), assessing against the Respondent a civil penalty of \$50,000.00 for each violation of the Act, and an additional civil penalty of \$10,000.00 for each day each violation continued;

E. Ordering the Respondent to pay all costs, including expert witness, consultant and attorney fees, expended by the State in pursuit of this action; and

F. Ordering such other and further relief as the Board deems appropriate and just.

COUNT VII
AIR POLLUTION

1-13. Complainant realleges and incorporates herein by reference paragraphs 1 through 13 of Count I as and for paragraphs 1 through 13 of this Count VII.

14. Sections 3.115 and 3.165 of the Act, 415 ILCS 5/3.115 and 3.165 (2020), provide the following definitions:

“Air pollution” is the presence in the atmosphere of one or more contaminants in sufficient quantities and of such characteristics and duration as to be injurious to human, plant, or animal life, to health, or to property, or to unreasonably interfere with the enjoyment of life or property.

“Contaminant” is any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source.

15. Section 9(a) of the Act, 415 ILCS 5/9 (2020), provides as follows:

No person shall:

- (a) Cause or threaten or allow the discharge or emission of any contaminant into the environment in any State so as to cause or tend to cause air pollution in Illinois, either alone or in combination with contaminants from other sources, or so as to violate regulations or

standards adopted by the Board under this Act.

16. By causing or allowing the open burning of refuse or waste at the West Frankfort Property producing smoke, a heat plume and flames, Respondent caused, threatened or allowed the emission of contaminants into the environment so as to cause or tend to cause air pollution in this State.

17. By causing, threatening or allowing the emission of contaminants into the environment so as to cause or tend to cause air pollution in Illinois, Respondent violated Section 9(a) of the Act, 415 ILCS 5/9(a) (2020).

PRAYER FOR RELIEF

WHEREFORE, the Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order in favor of the Complainant and against the Respondent, WILLIAM M. LONGWELL, for the following relief:

A. Authorizing a hearing in this matter at which time Respondent will be required to answer the allegations herein;

B. Finding that Respondent has violated Section 9(a) of the Act, 415 ILCS 5/9(a) (2020);

C. Ordering the Respondent to cease and desist from further violations of Section 9(a) of the Act, 415 ILCS 5/9(a) (2020);

D. Pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2020), assessing against Respondent a civil penalty of \$50,000 for each violation of the Act and an additional civil penalty of \$10,000 for each day each violation continued; and

E. Granting such other relief as the Board may deem appropriate.

COUNT VIII
OPEN BURNING OF REFUSE

1-15. Complainant realleges and incorporates herein by reference paragraphs 1 through 15 of Count I as and for paragraphs 1 through 15 of this Count VIII.

16. Section 9(c) of the Act, 415 ILCS 5/9(c) (2020), provides, in pertinent part, as follows:

No person shall:

* * *

- (c) Cause or allow the open burning of refuse, conduct any salvage operation by open burning, or cause or allow the burning of any refuse in any chamber not specifically designed for the purpose and approved by the Agency pursuant to regulations adopted by the Board under this Act; except that the Board may adopt regulations permitting open burning of refuse in certain cases upon a finding that no harm will result from such burning, or that any alternative method of disposing of such refuse would create a safety hazard so extreme as to justify the pollution that would result from such burning.

* * *

17. The food, beverage bottles and cans, general refuse and furniture burned by Respondent in the burn pit at the West Frankfort Property were “refuse” and “waste” as defined by Sections 3.385 and 3.535 of the Act, 415 ILCS 5/3.385 and 3.535 (2020).

18. The open burn pit employed by Respondent for the burning of the food, beverage bottles and cans, general refuse and furniture at the West Frankfort Property was not a chamber approved by Illinois EPA for the open burning of refuse.

19. By causing or allowing the open burning of refuse in a chamber not approved by Illinois EPA for the open burning of refuse, Respondent violated Section 9(c) of the Act, 415 ILCS 5/9(a) (2020).

PRAYER FOR RELIEF


WHEREFORE, the Complainant, PEOPLE OF THE STATE OF ILLINOIS, respectfully requests that the Board enter an order in favor of the Complainant and against the Respondent, WILLIAM M. LONGWELL, for the following relief:

- A. Authorizing a hearing in this matter at which time Respondent will be required to answer the allegations herein;
- B. Finding that Respondent has violated Section 9(c) of the Act, 415 ILCS 5/9(c) (2020);
- C. Ordering the Respondent to cease and desist from further violations of Section 9(c) of the Act, 415 ILCS 5/9(c) (2020);
- D. Pursuant to Section 42(a) of the Act, 415 ILCS 5/42(a) (2020), assessing against Respondent a civil penalty of \$50,000 for each violation of the Act and an additional civil penalty of \$10,000 for each day each violation continued; and
- E. Granting such other relief as the Board may deem appropriate.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS,
by KWAME RAOUL, Attorney General
of the State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/Asbestos
Litigation Division

BY: 
ANDREW ARMSTRONG, Chief
Environmental Bureau
ARDC #6282447
Assistant Attorney General

Of Counsel

Raymond J. Callery

ARDC #6193579

Assistant Attorney General

500 South Second Street

Springfield, Illinois 62706

217/782-9031

raymond.callery@ilag.gov

ebs@ilag.gov

Dated: October 26, 2022

CERTIFICATE OF SERVICE

I hereby certify that I did on October 26, 2022, send out a request for these documents to be personally served: Notice of Filing, Complaint and Certificate of Service upon:

William Longwell
301 South 24th Street
Herrin, IL 62948
(*via personal service*)

/s/Lilia Brown
Lilia Brown
Administrative Secretary

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 Certificate of Service are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

/s/Lilia Brown
Lilia Brown
Administrative Secretary