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DEC 23 2003

STATE OF ILLINOIS
Pollution Control Board

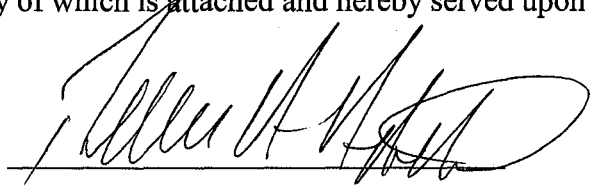
STATE OF ILLINOIS
Pollution Control Board
James R. Thompson Center
100 West Randolph Street - Suite 11-500
Chicago, Illinois 60601

L. ERICKSON,)
Complainant,)
v)
CHARLESTON CLASSIC) PCB 04-26
HOMES and LAWRENCE E.)
VAN SOMEREN, JR.,)
Respondent.)

NOTICE OF FILING

TO: Lynn Erickson
317 East Hawthorne Boulevard
Wheaton, Illinois 60187

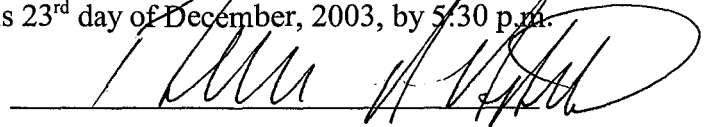
PLEASE TAKE NOTICE that on December 23, 2003 I filed with the Illinois Pollution Board, Answer to Formal Complaint on behalf of Respondent, CHARLESTON CLASSIC HOMES and LAWRENCE E. VAN SOMEREN, JR., a copy of which is attached and hereby served upon you.



Thomas A. Appel - #06182514
APPEL & APPEL, LTD.
18607 Torrence Avenue - Suite 2A
Lansing, Illinois 60438
708-474-8800

CERTIFICATE OF SERVICE

I, THOMAS A. APPEL, on oath state I served the within Notice and attachment upon L. Erickson by mailing copies of same to the address noted herein and depositing same in the U.S. Mail of Lansing, Illinois, proper postage prepaid, this 23rd day of December, 2003, by 5:30 p.m.



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

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DEC 23 2003

STATE OF ILLINOIS
Pollution Control Board

BEFORE THE
ILLINOIS POLLUTION CONTROL BOARD

L. ERICKSON

Complainant,

v.

PCB 04-26

CHARLESTON CLASSIC HOMES,
INC., and LAWRENCE E. VAN
SOMEREN, JR.

Respondent.

ANSWER TO FORMAL COMPLAINT

Now Comes Respondents CHARLESTON CLASSIC HOMES and LAWRENCE E.
VAN SOMEREN, JR. (hereinafter referred to as "Respondent"), by and through their attorneys,
THOMAS A. APPEL and APPEL & APPEL, LTD., and for their Answer to the formal
Complaint submitted herein state as follows:

1. Defendants admit the allegations contained in paragraph 1 of the formal Complaint.
2. As paragraph 2 of the formal Complaint contains no allegations against these
Defendants, Defendants make no answer thereto.
3. Defendants admit that Lawrence E. Van Someren, Jr. has been named as a Respondent
to the Complaint; deny that Lawrence E. Van Someren, Jr. is a proper Respondent; and
affirmatively state that all activities undertaken at the property have been undertaken by

Charleston Classic Homes, Inc.

4. Defendants admit that the construction activities at the property have included the demolition of an existing home and the construction of a new home; Defendants deny the remaining allegations contained in paragraph 4 of the formal Complaint.

5. Defendants deny the allegations contained in paragraph 5 of the formal Complaint.

6. Defendants admit that there have been typical construction noise at the property, which noise is normal and usual for the construction of the new home; Defendants deny the remaining allegations contained in paragraph 6 of the formal Complaint.

7. Defendants deny the allegations contained in paragraph 7 of the formal Complaint.

8. Defendants deny the allegations contained in paragraph 8 of the formal Complaint.

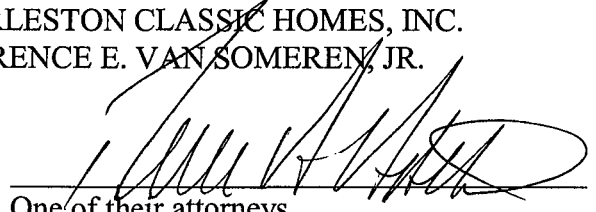
9. Defendants admit that Complainant is seeking certain relief from the Board; denies that it has violated any Illinois statutes; denies any improper activities or noise; and denies any allegation that the Board should take any action against the Defendants in this action as alleged in paragraph 9 of the formal Complaint.

10. Defendants are without information sufficient to admit or deny the allegations contained in paragraph 10 of the formal Complaint, and therefore deny same and demand strict proof thereof.

11. Defendants admit that Complainant is representing herself in this action; Defendants deny the remaining allegations contained in paragraph 11 of the formal Complaint.

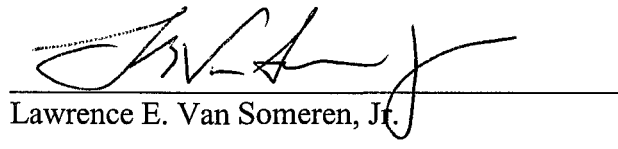
CHARLESTON CLASSIC HOMES, INC.
LAWRENCE E. VAN SOMEREN, JR.

BY:


One of their attorneys

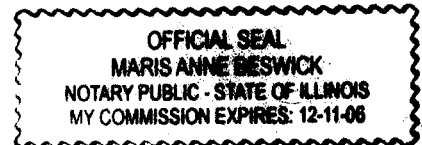
STATE OF ILLINOIS)
)SS:
COUNTY OF COOK)

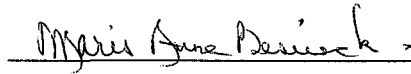
I, LAWRENCE E. VAN SOMEREN, JR., on oath or affirmation state that I have read the foregoing Answer to the formal Complaint and that it is accurate to the best of my knowledge.


Lawrence E. Van Someren, Jr.

SUBSCRIBED AND SWORN TO before me

this 22nd day of December, 2003.



, Notary Public

CERTIFICATE OF SERVICE

I certify that a copy of the within instrument was served on all parties of record.


Thomas A. Appel, Attorney