

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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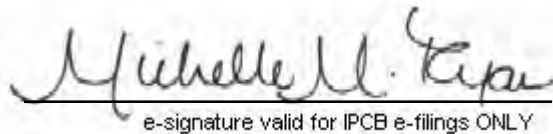
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Complainant,	)	AC 2024-001
	)	
v.	)	(IEPA No. 129-23-AC)
	)	
LESLIE FANN and THOMAS FANN d/b/a	)	
FANN TREE SERVICE,	)	
	)	
	)	
Respondents.	)	

**NOTICE OF FILING**

To: Leslie and Thomas Fann  
11333 Cedar Grove Road  
Marion, IL 62959

PLEASE TAKE NOTICE that on this date I electronically filed with the Clerk of the Pollution Control Board of the State of Illinois the following instrument(s) entitled MOTION TO WITHDRAW ADMINISTRATIVE CITATION.

Respectfully Submitted,



e-signature valid for IPCB e-filings ONLY

Michelle M. Ryan  
Assistant Counsel

Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
(217) 782-5544

Dated: March 19, 2024

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Complainant,	)	AC 2024-001
	)	
v.	)	(IEPA No. 129-23-AC)
	)	
LESLIE FANN and THOMAS FANN d/b/a	)	
FANN TREE SERVICE,	)	
	)	
	)	
Respondents.	)	

COMPLAINANT'S MOTION TO  
WITHDRAW ADMINISTRATIVE CITATION

NOW COMES the Complainant, the Illinois Environmental Protection Agency (“Illinois EPA”), by and through its attorney, Assistant Counsel Michelle M. Ryan, pursuant to 35 Ill. Adm. Code 101.500, and respectfully states as follows:

(1) On August 17, 2023 , Illinois EPA issued an Administrative Citation to Respondents, Leslie Mandrell and Thomas Fann d/b/a Fann Tree Service (“Respondents”), based on an inspection conducted on June 21, 2023.

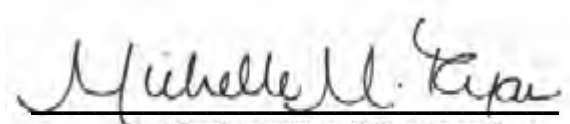
(2) On October 10, 2023, Respondent Leslie Mandrell filed a petition for review, noting in part that her surname was “Fann.” On December 27, 2023, Respondents filed a timely amended petition for review contesting this Administrative Citation.

(3) Based upon facts and circumstances discovered since the filing of the Administrative Citation, Illinois EPA has determined that it is prudent to withdraw this Administrative Citation at this time.

WHEREFORE, the Illinois Environmental Protection Agency requests that the Board dismiss the pending action against Respondents Leslie and Thomas Fann.

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,  
Complainant

DATED: March 19, 2024



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Assistant Counsel

Illinois Environmental Protection Agency  
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**PROOF OF SERVICE**

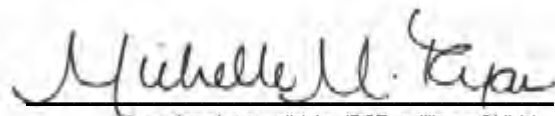
I hereby certify that I did on the 19<sup>th</sup> day of March, 2024, send by electronic mail a true and correct copy of the following instrument(s) entitled MOTION TO WITHDRAW

ADMINISTRATIVE CITATION

To: Leslie and Thomas Fann  
11333 Cedar Grove Road  
Marion, IL 62959  
[winter\\_baby24@hotmail.com](mailto:winter_baby24@hotmail.com)

and an electronic copy of the same foregoing instrument on the same date via electronic filing

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



e-signature valid for IPCB e-filings ONLY

Michelle M. Ryan  
Special Assistant Attorney General

Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
(217) 782-5544