

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE
JUL 8 2003
STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS,)
Complainants,)
)
vs.) PCB # 01-07
) (Enforcement-Air)
)
QC FINISHERS, INC., an Illinois Corporation,))
Respondent.)

NOTICE OF FILING

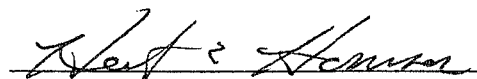
To:
Ms. Paula Becker Wheeler
Assistant Attorney General
Office of the Attorney General
188 West Randolph Street, 20th Floor
Chicago, Illinois 60601

Clerk, Illinois Pollution Control Board
100 W. Randolph Street
State of Illinois Center
Suite 11-500
Chicago, Illinois 60601

Mr. Bradley Halloran
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center, Suite 11-500
100 W. Randolph Street
Chicago, Illinois 60601

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board the original and four copies of Subpoena Duces Tecum to four individuals on behalf of QC Finishers, Inc., a copy of which is hereby served upon you.

Respectfully submitted,


Heidi E. Hanson

Dated July 7, 2003
Heidi E. Hanson
H. E. Hanson, Esq. P.C.
4721 Franklin Ave, Suite 1500
Western Springs, IL 60558-1720
(708) 784-0624

H. E. HANSON, ESQ. P.C.

Law Office
4721 Franklin Ave., Suite 1500
Western Springs, IL 60558-1720

Telephone (708) 784-0624
Fax (708) 784-0627

July 6, 2003

Ms. Paula Becker Wheeler
Assistant Attorney General
Environmental Bureau
Office of the Attorney General
188 W. Randolph St., 20th Floor
Chicago, IL 60601

RE: People v. Q C Finishers, Inc. PCB # 01-007

Dear Ms. Wheeler:

I am enclosing copies of subpoenas for deposition, and checks, for four people.

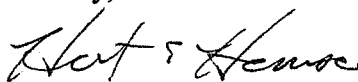
In Interrogatory #1 and the Definitions and Instructions Section F, Q C Finishers asked for the addresses of your potential witnesses. Your answers did not include them and you did not object to the request. Q C Finishers objects to your failure to provide the addresses and other requested information.

Given the impending deadline for the service of subpoenas I called your office on July 2nd to get the addresses and spoke with Joel Sternstein who told me on July 3rd that he was unable to persuade the IEPA attorney to provide him with the addresses. He instructed me to send the subpoenas care of you. In following the procedure your office outlined Q C Finishers is not waiving any objection to the form of Answers you provided.

Also you were unable to provide even a single name (other than the two accountants) in answer to Interrogatory #2 which asked you to identify all persons having knowledge of the facts, circumstances and other matters alleged in the complaint. As a result Q C Finishers must reserve the right to subpoena additional individuals.

I would also like to take this opportunity to invite you to contact me regarding setting up a S. Ct. Rule 201(k) conference at your earliest possible convenience.

Sincerely,


Heidi E. Hanson

cc: Brad Halloran, Hearing Officer
Charles Stitzel, QCF

encl.

Before the Illinois Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS)

Complainants,)

Complainant/Petitioner,)

PCB 01-07

v.)

Q C FINISHERS INC. an Illinois Corporation,)

Respondent.)

Respondent.)

Ms. Crystal Myers-Wilkins
c/o Ms. Paula Becker Wheeler

SUBPOENA DUCES TECUM

TO:

Assistant Attorney General
Environmental Bureau
Office of the Attorney General
188 W. Randolph St., 20th Floor
Chicago, IL 60601

Pursuant to Section 5(e) of the Environmental Protection Act (415 ILCS 5/5(e)

(2002)) and 35 Ill. Adm. Code 101, Subpart F, you are ordered to attend and give

testimony at the hearing/deposition in the above-captioned matter at 9:30

 a. .m. on July 21 20 03 , at

321 S. Plymouth Court, Chicago, Illinois

You are also ordered to bring with you documents relevant to the matter under

consideration and designated herein, none

Failure to comply with this subpoena will subject you to sanctions under 35 Ill.

Adm. Code 101.622(g) and 101802.

ENTER:

Dorothy M. Gunn

Dorothy M. Gunn, Clerk
Pollution Control Board

Date: February 13, 2003

I served this subpoena duces tecum by handing a copy to _____

_____ on _____, 20_____.

Subscribed and sworn to before me this _____ day of _____,

20_____.

I, the undersigned, certify that I have filed the attached Subpoena Duces Tecum by postage paid, certified mail return receipt requested, by depositing same at a U. S. Postal facility before 4: 00 p.m. on July 7, 2003, upon Ms. Paula Becker, Wheeler, Assistant Attorney General, Environmental Bureau, Office of the Attorney General, 188 W. Randolph St., 20th Floor, Chicago, IL 60601, pursuant to instructions received from the Office of the Illinois Attorney General.

Dated July 7, 2003

Heidi E. Hanson
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H. E. Hanson, Esq. P.C.
4721 Franklin Ave, Suite 1500
Western Springs, IL 60558-1720
(708) 784-0624

H.E. HANSON, ESQ., PC
4721 FRANKLIN AVE., STE. 1500
WESTERN SPRINGS, IL 60558

MIDAMERICA BANK
WESTERN SPRINGS, ILLINOIS 60558
70-7156-2719

2170

PAY TO
THE ORDER
OF

Date 7/7/2003

\$*105.00

DOLLARS

Ms. Crystal Myers-Wilkins

One Hundred Five and 00/100*****

Ms. Crystal Myers-Wilkins

People v. Q C Finishers Deposition fees

H.E. Hanson NP

⑆ 271971560⑆ 610021837⑆ 2170

080935/1-96

Security Features Included. Details on back.

Before the Illinois Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS)

Complainants,)

Complainant/Petitioner,)

v.)

Q C FINISHERS INC. an Illinois Corporation,)

Respondent.)

Respondent.)

PCB 01-07

Mr. Gary Styzens SUBPOENA DUCES TECUM
c/o Ms. Paula Becker Wheeler

TO: Assistant Attorney General
Environmental Bureau
Office of the Attorney General
188 W. Randolph St., 20th Floor
Chicago, IL 60601
Pursuant to Section 5(e) of the Environmental Protection Act (415 ILCS 5/5(e)

(2002)) and 35 Ill. Adm. Code 101, Subpart F, you are ordered to attend and give

testimony at the hearing/deposition in the above-captioned matter at 1:30

p. .m. on July 21 20 03, at

321 S. Plymouth Court, Chicago, Illinois

You are also ordered to bring with you documents relevant to the matter under

consideration and designated herein, a copy of his resume and any additional
statements of his qualifications and a copy of correspondence with Dr. John Nosauri.

Failure to comply with this subpoena will subject you to sanctions under 35 Ill.

Adm. Code 101.622(g) and 101802.

ENTER:

Dorothy M. Gunn

Dorothy M. Gunn, Clerk
Pollution Control Board

Date: February 13, 2003

I served this subpoena duces tecum by handing a copy to _____

_____ on _____, 20_____.

Subscribed and sworn to before me this _____ day of _____,

20_____.

I, the undersigned, certify that I have filed the attached Subpoena Duces Tecum by postage paid, certified mail return receipt requested, by depositing same at a U. S. Postal facility before 4: 00 p.m. on July 7, 2003, upon Ms. Paula Becker, ~~Whelan~~ Assistant Attorney General, Environmental Bureau, Office of the Attorney General, 188 W. Randolph St., 20th Floor, Chicago, IL 60601, pursuant to instructions received from the Office of the Illinois Attorney General.

Dated July 7, 2003

Heidi E. Hanson
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Western Springs, IL 60558-1720
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WESTERN SPRINGS, IL 60558

MIDAMERICA BANK
WESTERN SPRINGS, ILLINOIS 60558
70-7156-2719

2171

PAY TO
THE ORDER
OF

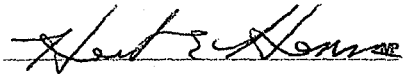
Date 7/7/2003

\$105.00

Mr. Gary Styzens
One Hundred Five and 00/100***** DOLLARS

Mr. Gary Styzens

People v. Q C Finishers Deposition fees



⑆271971560⑆ 610021837⑈ 2171

0809357156

Details on back.



Security Features Included.

Before the Illinois Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS)

Complainants,)

Complainant/Petitioner,)

v.)

Q C FINISHERS INC. an Illinois Corporation)

Respondent.)

Respondent.)

PCB 01-07

Mr. Chris Romaine SUBPOENA DUCES TECUM
c/o Ms. Paula Becker Wheeler

TO: Assistant Attorney General
Environmental Bureau
Office of the Attorney General
188 W. Randolph St., 20th Floor
Chicago, IL 60601
Pursuant to Section 5(e) of the Environmental Protection Act (415 ILCS 5/5(e)

(2002)) and 35 Ill. Adm. Code 101, Subpart F, you are ordered to attend and give

testimony at the hearing/deposition in the above-captioned matter at 10:00

a. .m. on July 24 20 03, at

a location in Springfield, Illinois to be designated later.

You are also ordered to bring with you documents relevant to the matter under

consideration and designated herein, copies of the USEPA and IEPA guidances

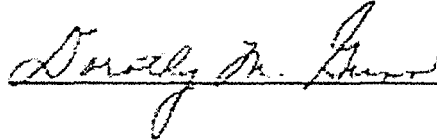
applicable between 1985 and 1999 on the determination of potential to emit VOC

and VOM for purposes of major source determinations

Failure to comply with this subpoena will subject you to sanctions under 35 Ill.

Adm. Code 101.622(g) and 101802.

ENTER:



Dorothy M. Gunn, Clerk
Pollution Control Board

Date: February 13, 2003

I served this subpoena duces tecum by handing a copy to _____


_____ on _____, 20_____.

Subscribed and sworn to before me this _____ day of _____,

20_____.

I, the undersigned, certify that I have filed the attached Subpoena Duces Tecum by postage paid, certified mail return receipt requested, by depositing same at a U. S. Postal facility before 4: 00 p.m. on July 7, 2003, upon Ms. Paula Becker Wheeler, Assistant Attorney General, Environmental Bureau, Office of the Attorney General, 188 W. Randolph St., 20th Floor, Chicago, IL 60601, pursuant to instructions received from the Office of the Illinois Attorney General.

Dated July 7, 2003


Heidi E. Hanson

Heidi E. Hanson
H. E. Hanson, Esq. P.C.
4721 Franklin Ave, Suite 1500
Western Springs, IL 60558-1720
(708) 784-0624

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4721 FRANKLIN AVE., STE. 1500
WESTERN SPRINGS, IL 60558

MIDAMERICA BANK
WESTERN SPRINGS, ILLINOIS 60558
70-7156-2719

2165

PAY TO
THE ORDER
OF

Date 7/5/2003

Mr. Chris Romaine

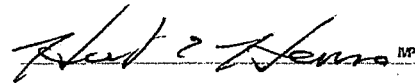
\$**23.00

Twenty-Three and 00/100*****

DOLLARS

Mr. Chris Romaine

People v. Q C Finishers



⑆ 271971560⑆ 610021837⑆ 2165

06109351-96

Details on back. Security Features Included.

Before the Illinois Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS)

Complainants,)

Complainant/Petitioner,)

v.)

Q C FINISHERS INC. an Illinois Corporation,)

Respondent.)

Respondent.)

PCB 01-07

Dr. John Nosauri SUBPOENA DUCES TECUM
c/o Ms. Paula Becker ~~Wheeler~~

TO: Assistant Attorney General
Environmental Bureau
Office of the Attorney General
188 W. Randolph St., 20th Floor
Chicago, IL 60601
Pursuant to Section 5(e) of the Environmental Protection Act (415 ILCS 5/5(e)

(2002)) and 35 Ill. Adm. Code 101, Subpart F, you are ordered to attend and give

testimony at the hearing/deposition in the above-captioned matter at 2:00

10 .m. on July 24 20 03 , at

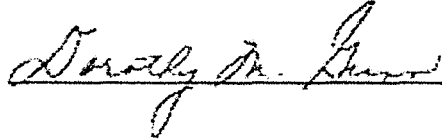
a location in Springfield, Illinois to be designated later.

You are also ordered to bring with you documents relevant to the matter under consideration and designated herein, his entire file on Q C Finishers, Inc. including but not limited to, all correspondence with the State of Illinois, its agencies and officers.

Failure to comply with this subpoena will subject you to sanctions under 35 Ill.

Adm. Code 101.622(g) and 101802.

ENTER:



Dorothy M. Gunn, Clerk
Pollution Control Board

Date: February 13, 2003

I served this subpoena duces tecum by handing a copy to _____


_____ on _____, 20_____.

Subscribed and sworn to before me this _____ day of _____,

20_____.

I, the undersigned, certify that I have filed the attached Subpoena Duces Tecum by postage paid, certified mail return receipt requested, by depositing same at a U. S. Postal facility before 4: 00 p.m. on July 7, 2003, upon Ms. Paula Becker Wheeler, Assistant Attorney General, Environmental Bureau, Office of the Attorney General, 188 W. Randolph St., 20th Floor, Chicago, IL 60601, pursuant to instructions received from the Office of the Illinois Attorney General.

Dated July 7, 2003


Heidi E. Hanson

Heidi E. Hanson
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4721 Franklin Ave, Suite 1500
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(708) 784-0624

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MIDAMERICA BANK
WESTERN SPRINGS, ILLINOIS 60558
70-7156-2719

2164

PAY TO
THE ORDER
OF

Date 7/5/2003

\$**23.00

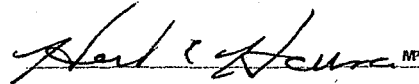
Dr. John Nosari

DOLLARS

Twenty-Three and 00/100*****

Dr. John Nosari

People v. Q C Finishers deposition



⑆271971560⑆ 610021837⑈ 2164

080035 1196

Details on back.



Security Features included.

CERTIFICATE OF SERVICE

I, the undersigned, certify that I have served the attached Subpoena Duces Tecum by deposit in a U. S. Mailbox before 4:00 p.m. on July 7, 2003 upon the following persons:

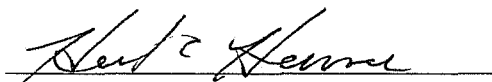
One copy:

Paula Becker Wheeler
Assistant Attorney General
Office of the Attorney General
188 West Randolph Street, 20th Floor
Chicago, Illinois 60601

Mr. Bradley Halloran
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center, Suite 11-500
100 W. Randolph Street
Chicago, Illinois 60601

Original and four copies:
Clerk, Illinois Pollution Control Board
100 W. Randolph Street
State of Illinois Center
Suite 11-500
Chicago, Illinois 60601

Dated: July 7, 2003

A handwritten signature in cursive script, appearing to read "Heidi E. Hanson", is written over a horizontal line.

Heidi E. Hanson
H. E. Hanson, Esq. P.C.
4721 Franklin Ave, Suite 1500
Western Springs, IL 60558-1720
(708) 784-0624

This filing is submitted on recycled paper.