

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

Catherine Johnson and Eric Johnson, Complainant(s), v.

Village of Willowbrook IL, Parks and Recreation Department, Respondent

PCB CASE NUMBER 2026-061

MOTION FOR LEAVE TO FILE SECOND AMENDED FORMAL COMPLAINT WITH MERGED_EXHIBITS A-F/pdf

Now comes the Complainant(s), Catherine Johnson and Eric Johnson, and respectfully moves the Illinois Pollution Control Board for leave to file a Second Amended Formal Complaint. In support of this MOTION, Complainant(s) states:

1. On June 24, 2026 Complainant(s) filed a FORMAL CITIZEN NOISE ENFORCEMENT complaint against Respondent.
2. Due to a typographical error, PARAGRAPH #5 (List specific sections of the EPA...) incorrectly cited the Illinois Environmental Protection Act as 45 ILCS 5/2024 instead of 415 ILCS 5/24.
3. This motion was made in good faith solely to correct this clerical error and properly cite Section 24 of the Act (415 ILCS 5/24) regarding prohibited NOISE emissions.
4. Correcting this citation will NOT cause unfair surprise or prejudice to the Respondent and we thank the IPCB for its prompt actions to remediate this issue.
5. Subsequently, on July 10, 2026 Complainant(s), not yet receiving FOIA requests from Respondent(s) regarding Acoustic Sound study dated May 29, 2026 as well as private data from NoiseNet acoustic monitoring, this SECOND AMENDED FORMAL COMPLAINT was filed to include as much detail now in SECOND AMENDED FORMAL COMPLAINT as MERGED_EXHIBITS A-F.
6. We are not lawyers and we thank the ICPB for their consideration in this very important process.

WHEREFORE, Complainant(s) respectfully requests that the Board grant leave to file the attached SECOND AMENDED FORMAL COMPLAINT with MERGED_EXHIBITS A-F.

DATE: July 10, 2026

Respectfully submitted,

Catherine Johnson and Eric Johnson

215 75th Street, Willowbrook, IL 60527 Phone: 630 917-0694