

Electronic Filing: Received, Clerk's Office 12/15/2022

From: [Paul Pratapas](#)
To: [Cathy Coluzzi](#)
Cc: [Brown, Don](#); [Jay Koehler](#); [Patrick McPartlan](#); [Bennett, Todd](#)
Subject: [External] Re: Paul C. Pratapas re: Naper Commons, Wagner Farms and Trillium Farm Complaints sent via E-Mail and Certified Mail/Return Receipt Requested
Date: Thursday, December 15, 2022 12:10:47 PM

Wow, a heavy metal guitarist is too much to handle emailing with?

So it sounds like he's refusing to adhere to permit guidelines for the purposes of rigging the outcome in his favor, which is prohibited, and the whole reason for the language "reasonable amount of time".

And he really enjoys attacking people, throwing his secretary under the bus, but when he doesn't get his way, hides.

I highly recommend this article on narcissistic personality disorder:

<https://www.mayoclinic.org/diseases-conditions/narcissistic-personality-disorder/symptoms-causes/syc-20366662>

On Thu, Dec 15, 2022 at 11:54 AM Michael Maher <mmaher@smbtrials.com> wrote:

Mr. Pratapas:

As indicated in my last email, I am now blocking correspondence from you, until proper under applicable rules/regulations.

Do NOT assume I received further communications from you, as I did not.

Neither I nor Pulte are responsible for anything contained in future email from you, until such time is proper.

Sincerely,

Michael J. Maher, Partner

Swanson, Martin & Bell, LLP

[330 N. Wabash](#), 33rd Floor

Electronic Filing: Received, Clerk's Office 12/15/2022

Chicago, IL 60611

312/923-8261

Fax: 312/321-0990

From: Paul Pratapas <paulpratapas@gmail.com>

Sent: Thursday, December 15, 2022 11:50 AM

To: Michael Maher <mmaher@smbtrials.com>

Cc: Brown, Don <Don.Brown@illinois.gov>; Cathy Coluzzi <ccoluzzi@smbtrials.com>; Jay Koehler <jkoehler@smbtrials.com>; Patrick McPartlan <patrick.mcpartlan@kanedupageswcd.org>; Todd.Bennett@illinois.gov

Subject: Re: Paul C. Pratapas re: Naper Commons, Wagner Farms and Trillium Farm Complaints sent via E-Mail and Certified Mail/Return Receipt Requested

You are the last person at the party, but the most narcissistic with all the answers and insights. You MUST be a lawyer.

Can you elaborate on why this Pulte employee followed me to my vehicle, approached me from behind and began taking photographs of my father's license plate from 3 inches away? After they were served with legal documents regarding the fact they have no idea what the laws are.

And again, Michael, there's a lot of questions going out, but not a lot of answers coming in, can you fix that?

When are you available to make the SWPPP book for the Plainfield site available for public review?





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On Thu, Dec 15, 2022 at 11:33 AM Michael Maher <mmaher@smbtrials.com> wrote:

Mr. Pratapas:

Your rant below is improper.

No one at/for Pulte is threatening you about anything.

Your calling me "*Mr. Fuhrer*" is inflammatory.

My client will not provide documents outside the normal course.

Any such request is improper.

Please cease from further correspondence, as I intend to block further email from you until appropriate.

Sincerely,

Michael J. Maher, Partner

Swanson, Martin & Bell, LLP

[330 N. Wabash](#), 33rd Floor

Chicago, IL 60611

312/923-8261

Fax: 312/321-0990

From: Paul Pratapas <paulpratapas@gmail.com>

Sent: Thursday, December 15, 2022 11:26 AM

To: Michael Maher <mmaher@smbtrials.com>

Cc: Brown, Don <Don.Brown@illinois.gov>; Cathy Coluzzi <ccoluzzi@smbtrials.com>; Jay Koehler <koehler@smbtrials.com>; Patrick McPartlan <patrick.mcpartlan@kanedupageswcd.org>; Todd.Bennett@illinois.gov

Subject: Re: Paul C. Pratapas re: Naper Commons, Wagner Farms and Trillium Farm Complaints sent via E-Mail and Certified Mail/Return Receipt Requested

Can you please elaborate on all the parts of the constitution you have declared "Improper"?

And the parts of the CWA which deputize your office to determine, in real time, amendments for the benefit of your clients?

The SWPPP book is a living breathing document which constantly changes and remains on the site, in part, for the public to inspect. Any delays in providing access to the public is of significant concern and indicative of possible nefarious behavior.

Do you even know what a SWPPP book is? Do you know stormwater inspection is a certification?

Can you please provide myself and The Board with a comprehensive list of Pulte sites in IL which you have exempted from their permit obligations? And will refuse providing SWPPP book access to the public?

Polluting, threatening people and then denying people from their constitutional rights is improper.

Generating written evidence of permit violations and possible criminal activity is called, being one hell of a model American.

On Thu, Dec 15, 2022 at 10:53 AM Michael Maher <mmaher@smbtrials.com> wrote:

Mr. Pratapas:

Fines do NOT begin to accrue upon the date of an improper request.

My email below is clear.

Please refrain from repetitive/redundant correspondence.

Sincerely,

Michael J. Maher, Partner

Swanson, Martin & Bell, LLP

330 N. Wabash, 33rd Floor

Chicago, IL 60611

312/923-8261

Fax: 312/321-0990

From: Paul Pratapas <paulpratapas@gmail.com>

Sent: Thursday, December 15, 2022 10:50 AM

To: Michael Maher <mmaher@smbtrials.com>

Cc: Brown, Don <Don.Brown@illinois.gov>; Cathy Coluzzi <ccoluzzi@smbtrials.com>; Jay Koehler <jkoehler@smbtrials.com>; Patrick McPartlan

<patrick.mcpartlan@kanedupageswcd.org>; Todd.Bennett@illinois.gov

Subject: Re: Paul C. Pratapas re: Naper Commons, Wagner Farms and Trillium Farm Complaints sent via E-Mail and Certified Mail/Return Receipt Requested

So, you are unwilling to provide access to the SWPPP book for the site in Plainfield I have never seen other than in satellite images?

Landsdowne By Pulte in Plainfield

Please confirm so the clock can start for fines calculated per day. And to provide additional support for an indefinite end to permitting Pulte sites in IL and a criminal investigation.

Patrick- Can you please visit the above site to determine compliance? Pulte's attorney is refusing to provide access to what appears to be each and every Pulte site in IL.

Is that correct, Michael?

On Thu, Dec 15, 2022 at 10:33 AM Michael Maher <mmaher@smbtrials.com> wrote:

Mr. Pratapas:

I removed IEPA personnel from my response because your request was clearly improper -- and I sought to limit the volume of people who would be notified of your impropriety.

Now that you included them and Mr. McPartlan on your email, I copy all on this response.

The answer to your request for documentation: IF the IPCB takes your case and IF the Hearing Offer allows written discovery, THEN my client will timely comply with appropriate document requests. That time is not now.

Please refrain from future requests until the appropriate time.

Sincerely,

Michael J. Maher, Partner

Swanson, Martin & Bell, LLP

[330 N. Wabash](#), 33rd Floor

Chicago, IL 60611

312/923-8261

Electronic Filing: Received, Clerk's Office 12/15/2022

Fax: 312/321-0990

From: Paul Pratapas <paulpratapas@gmail.com>

Sent: Thursday, December 15, 2022 10:23 AM

To: Michael Maher <mmaher@smbtrials.com>; Patrick McPartlan <patrick.mcpartlan@kanedupageswcd.org>

Cc: Brown, Don <Don.Brown@illinois.gov>; Cathy Coluzzi <ccoluzzi@smbtrials.com>; Jay Koehler <jkoehler@smbtrials.com>; Todd.Bennett@illinois.gov

Subject: Re: Letter to Paul C. Pratapas re: Naper Commons, Wagner Farms and Trillium Farm Complaints sent via E-Mail and Certified Mail/Return Receipt Requested

Mr. Führer,

I had copied them when I replied to you because you removed their emails in your reply. How come?

Again, you are 4 of 20 complaints I have filed. And I worked alongside Patrick when I maintained SWPPP books professionally. Patrick is now on the email chain and is the contracted ILEPA Inspector for Kane and DuPage counties. They all know who I am. And the contracted inspector for Will and Southern Cook County.

Also, one thing I may. You forgot to address any of the questions.

Maybe you are right, Batavia is kinda far.

When are your clients available to provide access to the SWPPP book for Landsdowne By Pulte in Plainfield?

First request. Permit holder has a rich history of delays.

On Thu, Dec 15, 2022 at 10:00 AM Michael Maher <mmaher@smbtrials.com>

wrote:

Mr. Pratapas:

Putting aside your personal insult directed to me, please re-read my email of this morning, which I now copy to IEPA's **Todd Bennett** and **Don Brown**.

In sum, upon filing your complaint at the Illinois Pollution Control Board, applicable discovery, if any, is governed by Board rules -- not your unilateral demands.

There is nothing threatening about Mr. Koehler's letter confirming Illinois' law of trespass.

The website link you forwarded is a link to the Chicago Police Department's First District general website, regarding "*Conversations with a Commander*".

Thereafter, you threaten to "*request arrest of all parties involved*" for Mr. Koehler's demand that you comply with Illinois law.

It is neither threatening nor 'intimidation' to require your compliance with site access and document production rules of the forum (IPCB), where you chose to file your action.

Illinois law does not confer upon you -- or any person -- rights of trespass onto private property simply because you filed actions at the Illinois Pollution Control Board.

If the Pollution Control Board takes your case, the Hearing Office will issue appropriate discovery orders, at which time document production will be addressed.

My client will not engage in discovery actions, outside normal discovery procedures.

Sincerely,

Michael J. Maher, Partner

Swanson, Martin & Bell, LLP

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Fax: 312/321-0990

From: Paul Pratapas <paulpratapas@gmail.com>

Sent: Thursday, December 15, 2022 9:47 AM

To: Brown, Don <Don.Brown@illinois.gov>; Michael Maher <mmaher@smbtrials.com>;
Todd.Bennett@illinois.gov

Cc: Cathy Coluzzi <ccoluzzi@smbtrials.com>; Jay Koehler <Jkoehler@smbtrials.com>

Subject: Re: Letter to Paul C. Pratapas re: Naper Commons, Wagner Farms and Trillium Farm Complaints sent via E-Mail and Certified Mail/Return Receipt Requested

Please let me know when you can provide the SWPPP book for the site in Batavia. For which a complaint has not been filed because your client is such a disaster it depleted all of my printer ink. Which I have discussed with The Board in writing.

Do you have a copy of the formal complaint for the site in Batavia? Does your client? Is it on the website?

Your client has engaged in a pervasive pattern of intimidation and avoidance of responsibilities, which you have picked up via your letter. There is photographic evidence of the intimidation, as well as video, at Naper Commons.

- Do you know what public roads are?
- Are you familiar with violation in plain sight ideology in enforcement?
- Are you familiar with “spirit of the law” ideology?
- Do the sites have MANY signs, inviting the public to come right in?
- Do individual lots have “Available”

signs?

- Are you discriminating against me in attempt to prohibit my ability to petition the government and protect the natural environment?
- Are you or have you ever been certified as an inspector of stormwater?

•Which Pulte site have you visited most recently and when?

You are a very sad man to have your secretary, send threatening letters to protect a prolific polluter, and then make incorrect statements while demanding respect.

Your lack of research, but interest in aggressive tone is quite curious from the perspective of a professional behavioral analyst. Let me guess, you are a lawyer?

So again, when can you provide the book for the Pulte site in Batavia we have been discussing?

Can you tell me what that Pulte sign next to the violations says and which Pulte employees it is intended for?



This is the third (3) request.

I have reached out to Matt Murphy, former prosecutor for Orange County regarding the behavior of you and your client. I have also been training civil employees and police/sheriff departments regarding attempts by people such as yourself to have me unjustly arrested.

On Thu, Dec 15, 2022 at 9:10 AM Michael Maher <mmaher@smbtrials.com> wrote:

Mr. Pratapas:

Your assertions are mistaken.

Upon filing your complaint at the Illinois Pollution Control Board, applicable discovery, if any, is governed by Board rules -- not your unilateral demands.

There is nothing threatening about Mr. Koehler's letter confirming Illinois' law of trespass.

The website link you provide below is to the Chicago Police Department's First District general website, containing "[Conversations with a Commander](#)"; we are uncertain why you reference this general, public-access weblink.

Moreover, your threat to "*request arrest of all parties involved*" is curious.

It is neither threatening nor 'intimidation' to require your compliance with site access and document production rules of the forum (IPCB), where you chose to file your action.

Illinois law does not confer upon you -- or any person -- rights of trespass onto private property simply because you filed actions at the Illinois Pollution Control Board.

Sincerely,

Michael J. Maher, Partner

Swanson, Martin & Bell, LLP

[330 N. Wabash](#), 33rd Floor

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Fax: 312/321-0990

From: Paul Pratapas <paulpratapas@gmail.com>

Sent: Thursday, December 15, 2022 8:37 AM

To: Cathy Coluzzi <ccoluzzi@smbtrials.com>

Cc: Jay Koehler <jkoehler@smbtrials.com>; Michael Maher <mmaher@smbtrials.com>

Subject: Re: Letter to Paul C. Pratapas re: Naper Commons, Wagner Farms and Trillium Farm Complaints sent via E-Mail and Certified Mail/Return Receipt Requested

This is the second request to view the SWPPP book for the Pulte site in Batavia currently in violation. Law requires it be provided in a reasonable amount of time.

When can the book be provided to me?

I have also not been given access to the Wagner Farms SWPPP book I requested quite some time ago.

When can the book be provided to me?

I also demand you cease sending threatening letters in an attempt to dissuade me from participating in my civil liberties.

Any additional aggressive contact made with me or my family will result in Chicago Police being notified and your arrest requested for felony intimidation. A class 3 felony. I will request the arrest of all parties involved, including office assistants disrespected by their bosses.

<https://home.chicagopolice.org/about/police-districts/1st-district-central/>

Electronic Filing: Received, Clerk's Office 12/15/2022

On Wed, Dec 14, 2022 at 1:26 AM Paul Pratapas <paulpratapas@gmail.com> wrote:

Ms Capuzzi,

Please find attached pictures I just filed with The Board of continued violations at Trillium Farm by your client.

Regards,

Paul Pratapas

On Tue, Dec 13, 2022 at 4:51 PM Cathy Coluzzi <ccoluzzi@smbtrials.com> wrote:

Mr. Pratapas,

On behalf of Jay Koehler of Swanson, Martin & Bell, LLP, please see attached letter in regards to the above-referenced matter.

Thank you.

[Cathy Anna Coluzzi/Assistant To:](#)

[A. Jay Koehler](#) [Derrick L. Haddox](#)

[Rick C. Shea](#) [Kristen A. Cooke](#)

[SWANSON, MARTIN & BELL, LLP](#)

[330 North Wabash Avenue](#)

[Suite 3300](#)

[Chicago, Illinois 60611](#)

[Direct: \(312\) 222-8590](tel:(312)222-8590)

[Main: \(312\) 321-9100](tel:(312)321-9100)

[E-Mail: ccoluzzi@smbtrials.com](mailto:ccoluzzi@smbtrials.com)

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Kind Regards,

Paul Pratapas
630.696.2843

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