

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PEOPLE OF THE STATE OF ILLINOIS, )  
 by KWAME RAOUL, Attorney General )  
 of the State of Illinois, )  
 )  
 Complainant, )  
 )  
 v. )  
 )  
 YOUTH FAIR CHANCE, INC., )  
 d/b/a CAPITOL REUSE CENTER, )  
 an Indiana not-for-profit corporation, and )  
 DALE ROWDEN, an individual, )  
 )  
 Respondents. )

PCB No. 21-45

**AMENDED NOTICE OF FILING**

To: See attached service list (Via Electronic Filing)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing the following **Motion to Deem Facts Admitted and for Summary Judgment** as to Respondent Dale Rowden, a copy of which is attached and hereby served upon you.

PEOPLE OF THE STATE OF ILLINOIS  
KWAME RAOUL, ATTORNEY GENERAL

MATTHEW J. DUNN, Chief  
Environmental Enforcement/Asbestos  
Litigation Division

BY: s/Emma L. Hudspath  
Emma L. Hudspath  
Environmental Bureau  
Assistant Attorney General  
500 South Second Street  
Springfield, Illinois 62701  
217/782-9031  
Emma.Hudspath@ilag.gov

Dated: May 26, 2023

**Service List**

Carol Webb  
Hearing Officer  
Illinois Pollution Control Board  
1021 North Grand Avenue East  
P.O. Box 19274  
Springfield, Illinois 62794-9274  
[Carol.webb@illinois.gov](mailto:Carol.webb@illinois.gov)

**For the Respondent**

Youth Fair Chance  
d/b/a Capitol Reuse Center  
c/o Danny Woodcock, Registered Agent  
701 North Holt Road, Suite 1  
Indianapolis, IN 46222 -4139

Dale Rowden  
1216 Patton Street  
Springfield, IL 62701

Dale Rowden  
1222 Patton Street  
Springfield, IL 62701

**CERTIFICATE OF SERVICE**

I hereby certify that I did on May 26, 2023, send true and correct copies of the document entitled **Amended Notice of Filing, Motion to Deem Facts Admitted and for Summary Judgment and Certificate of Service**, via certified mail with postage thereon fully prepaid, by depositing in a United States Postal Office Box in Springfield, Illinois to:

Youth Fair Chance  
d/b/a Capitol Reuse Center  
c/o Danny Woodcock, Registered Agent  
701 North Holt Road, Suite 1  
Indianapolis, IN 46222 -4139

Dale Rowden  
1216 Patton Street  
Springfield, IL 62701

Dale Rowden  
1222 Patton Street  
Springfield, IL 62701

and via electronic mail to:

Carol Webb  
Hearing Officer  
Illinois Pollution Control Board  
1021 North Grand Avenue East  
P.O. Box 19274  
Springfield, Illinois 62794-9274  
[Carol.webb@illinois.gov](mailto:Carol.webb@illinois.gov)

/s/ Katie Johnson  
Katie Johnson  
Environmental Bureau

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this certificate of service are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

/s/ Katie Johnson  
Katie Johnson  
Environmental Bureau