

09/25/2023  
IPCB 2023-14

Paul Christian Pratapas

Complainant

v

Horizon Construction Group, INC

Respondent

COMPLAINANTS STATUS UPDATE

Respondent continues to openly violate the conditions of their NPDES permit(s) and as of 09/25/2023 is making materially false statements regarding their permit obligations. Specifically, Respondent is refusing access to public records needed to properly petition the government for relief, refusing to post regulatory signage and repeatedly denying in public forums their obligations under the CWA NPDES permitting program. Despite knowingly and repeatedly signing required certifications to the contrary.

Respondent's actions violate the Constitutional rights of Complainant guaranteed under the First Amendment and undermine the primary enforcement mechanism of the NPDES Permitting Program.

Therefore, Complainant will also be pursuing a Federal Civil Lawsuit against Respondent seeking injunctive relief and monetary damages in the amount of \$40,000,000.

 09-25-2023

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