

Electronic Filing: Received, Clerk's Office 10/20/2023

From: [Paul Pratapas](#)
To: [Giovanni Padilla](#)
Cc: [Brown, Don](#); [Phil Luetkehans](#)
Subject: [External] Re: PCB-071 Discovery Requests
Date: Friday, October 20, 2023 2:19:37 PM
Attachments: [image001.png](#)

Before I provide any of this information.

Have you provided access to the SWPPP binder and inspection reports and do you have a work order and/or invoices for the installation of regulatory signage as required by Federal Law? Were you presented clear evidence the above was intentionally not done in violation of Federal Law? Why are you free to repeatedly and knowingly violate your permit requirements, while everyone else has to follow the rules for you to use against any enforcement attempts? Did the violations occur while building a police station?

Kind Regards,

Paul Pratapas

On Fri, Oct 20, 2023 at 2:00 PM Giovanni Padilla <GP@lbgalaw.com> wrote:

Mr. Pratapas,

Attached you will find discovery requests that will be filed with the Pollution Control Board today.

Thank you,

Giovanni Padilla



Giovanni Padilla
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