

# Electronic Filing: Received, Clerk's Office 10/25/2023

**From:** [Halloran, Brad](#)  
**To:** [Brown, Don](#)  
**Cc:** [Pauley, Daniel](#); [Halloran, Brad](#)  
**Subject:** FW: [External] Re: Official Service: PCB 2023-014, Paul Christian Pratapas v. Horizon Construction Group, Inc.  
**Date:** Wednesday, October 25, 2023 3:43:51 PM

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Don please docket. Thanks.

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**From:** Paul Pratapas <paulpratapas@gmail.com>  
**Sent:** Wednesday, October 25, 2023 3:32 PM  
**To:** Halloran, Brad <Brad.Halloran@illinois.gov>  
**Cc:** Goeller, Jon Micah <jonmicah.goeller@huschblackwell.com>; Lewandowski, Richard <richard.lewandowski@huschblackwell.com>  
**Subject:** [External] Re: Official Service: PCB 2023-014, Paul Christian Pratapas v. Horizon Construction Group, Inc.

Be advised. I will also be filing a \$1,000,000,000 lawsuit against ILEPA for leading permit holders to believe they don't need to follow federal laws and totally undermining the enforcement mechanism resulting in harassment by phone directed at me and my parents. All in violation of the United States Constitution. The most serious violations being engaged in by the respondent while loudly and proudly asserting their righteousness in violating very clear federal laws and pocketing the money in a continued criminal enterprise. AKA a racket promulgated by fraud.

A full report is going to be provided to the FBI to investigate respondent and their cohorts. I would advise all government agencies to refer to the regulations and not what they have seen on the ground.

I am equally an expert in these pollution matters as well as behavioral analysis and modification and I have very serious concerns.

On what planet is their a defense using the same laws they refuse to acknowledge after signing a certification under penalty of law?

Kind Regards,

Paul Pratapas

On Wed, Oct 25, 2023 at 2:55 PM Halloran, Brad <[Brad.Halloran@illinois.gov](mailto:Brad.Halloran@illinois.gov)> wrote:

That will be fine-although we still have nothing to discuss until the Board makes its decision on the motions before it. I have a conference now and, if okay, I will get back to you tomorrow regarding alternative and shorter date. Thank you.

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**From:** Lewandowski, Richard <[Richard.Lewandowski@huschblackwell.com](mailto:Richard.Lewandowski@huschblackwell.com)>  
**Sent:** Wednesday, October 25, 2023 2:52 PM  
**To:** Halloran, Brad <[Brad.Halloran@illinois.gov](mailto:Brad.Halloran@illinois.gov)>; Paul Pratapas <[paulpratapas@gmail.com](mailto:paulpratapas@gmail.com)>  
**Cc:** Goeller, Jon Micah <[JonMicah.Goeller@huschblackwell.com](mailto:JonMicah.Goeller@huschblackwell.com)>  
**Subject:** [External] RE: Official Service: PCB 2023-014, Paul Christian Pratapas v. Horizon Construction Group, Inc.

Mr. Halloran, thank you for the prompt reply. We would much prefer a short delay than waiting until early December.

**Richard J. Lewandowski**  
Senior Counsel  
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[Richard.Lewandowski@huschblackwell.com](mailto:Richard.Lewandowski@huschblackwell.com)

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**From:** Halloran, Brad <[Brad.Halloran@illinois.gov](mailto:Brad.Halloran@illinois.gov)>  
**Sent:** Wednesday, October 25, 2023 2:47 PM  
**To:** Lewandowski, Richard <[Richard.Lewandowski@huschblackwell.com](mailto:Richard.Lewandowski@huschblackwell.com)>; Paul Pratapas <[paulpratapas@gmail.com](mailto:paulpratapas@gmail.com)>  
**Cc:** Goeller, Jon Micah <[JonMicah.Goeller@huschblackwell.com](mailto:JonMicah.Goeller@huschblackwell.com)>; Halloran, Brad <[Brad.Halloran@illinois.gov](mailto:Brad.Halloran@illinois.gov)>  
**Subject:** RE: Official Service: PCB 2023-014, Paul Christian Pratapas v. Horizon Construction Group, Inc.

[EXTERNAL EMAIL]

Mr. Lewandowski- It is my understanding that the Board has taken under consideration your motion under advisement. Not sure what we can discuss until the Board makes its ruling. We can make it for next week if you would like but I have not seen the Board agenda for next Thursday. Please advise. Thank you.

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**From:** Lewandowski, Richard <[Richard.Lewandowski@huschblackwell.com](mailto:Richard.Lewandowski@huschblackwell.com)>  
**Sent:** Wednesday, October 25, 2023 2:36 PM

# Electronic Filing: Received, Clerk's Office 10/25/2023

**To:** Halloran, Brad <[Brad.Halloran@illinois.gov](mailto:Brad.Halloran@illinois.gov)>; Paul Pratapas <[paulpratapas@gmail.com](mailto:paulpratapas@gmail.com)>

**Cc:** Goeller, Jon Micah <[JonMicah.Goeller@huschblackwell.com](mailto:JonMicah.Goeller@huschblackwell.com)>

**Subject:** [External] RE: Official Service: PCB 2023-014, Paul Christian Pratapas v. Horizon Construction Group, Inc.

Mr. Halloran, thank you for your email. We are concerned about a six week delay when very simple alternatives are available that will allow this matter to proceed tomorrow morning as scheduled:

- Mr. Pratapas found a way to email the Board, meaning that he found both internet access and the electricity needed to send the email;
- We can call his cell (which is battery operated) and you at the scheduled time; this does not require him to have electricity in his apartment;
- We understand that Mr. Pratapas moved to Memphis to work for a unit of local government. The call is scheduled during normal business hours. If he can't charge his phone at home, he should be able to do so at work, OR we could call him at his work number and join you to the call;
- To the best of our knowledge, Memphis is not experiencing a catastrophic power failure; any difficulties Mr. Pratapas may face are local and most likely of his own making.

We filed a comprehensive motion to dismiss, along with supporting materials, on June 21, 2023; we filed a reply brief in support of that motion on July 21, 2023. You probably noted that on October 24, we filed our brief in opposition to Mr. Pratapas' motion to amend the complaint yet again.

This matter has dragged on for a considerable amount of time. All work on the project was completed early last summer. Mr. Pratapas missed three prior status calls, did not respond to any of our discovery requests (including requests for admission), and failed to disclose any witnesses or identify any documents supporting his claims.

With all due respect, our client deserves to get this matter resolved and behind them. We ask that the call proceed tomorrow morning as scheduled.

Respectfully submitted,

**Richard J. Lewandowski**  
Senior Counsel

**HUSCH BLACKWELL LLP**

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Direct: 608-258-7388

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[vBio|vCard](#)

**Technology, Manufacturing & Transportation**

**Environmental**

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**From:** Halloran, Brad <[Brad.Halloran@illinois.gov](mailto:Brad.Halloran@illinois.gov)>

**Sent:** Wednesday, October 25, 2023 1:54 PM

**To:** Goeller, Jon Micah <[JonMicah.Goeller@huschblackwell.com](mailto:JonMicah.Goeller@huschblackwell.com)>; Lewandowski, Richard <[Richard.Lewandowski@huschblackwell.com](mailto:Richard.Lewandowski@huschblackwell.com)>;

Paul Pratapas <[paulpratapas@gmail.com](mailto:paulpratapas@gmail.com)>

**Cc:** Halloran, Brad <[Brad.Halloran@illinois.gov](mailto:Brad.Halloran@illinois.gov)>

**Subject:** RE: Official Service: PCB 2023-014, Paul Christian Pratapas v. Horizon Construction Group, Inc.

[EXTERNAL EMAIL]

Counsel- Mr. Pratapas recently emailed our Clerk and said he has no electricity and will not be available for the status tomorrow. I suggest we reschedule the status to December 7, 2023, at 11:30 a.m. Thank you and let me know.

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**From:** Mims, Barbara <[Barbara.Mims@illinois.gov](mailto:Barbara.Mims@illinois.gov)>

**Sent:** Monday, September 25, 2023 12:13 PM

**To:** [jonmicah.goeller@huschblackwell.com](mailto:jonmicah.goeller@huschblackwell.com); [richard.lewandowski@huschblackwell.com](mailto:richard.lewandowski@huschblackwell.com); Paul Pratapas <[paulpratapas@gmail.com](mailto:paulpratapas@gmail.com)>

**Cc:** Halloran, Brad <[Brad.Halloran@illinois.gov](mailto:Brad.Halloran@illinois.gov)>

**Subject:** Official Service: PCB 2023-014, Paul Christian Pratapas v. Horizon Construction Group, Inc.

## Electronic Filing: Received, Clerk's Office 10/25/2023

By this e-mail, the Illinois Pollution Control Board serves you with the attached order of September 25, 2023.

State of Illinois - CONFIDENTIALITY NOTICE: The information contained in this communication is confidential, may be attorney-client privileged or attorney work product, may constitute inside information or internal deliberative staff communication, and is intended only for the use of the addressee. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately by return e-mail and destroy this communication and all copies thereof, including all attachments. Receipt by an unintended recipient does not waive attorney-client privilege, attorney work product privilege, or any other exemption from disclosure.