

# Electronic Filing: Received, Clerk's Office 11/14/2023

**From:** [Phil Luetkehans](#)  
**To:** [Paul Pratapas](#); [Giovanni Padilla](#)  
**Cc:** [Brown, Don](#)  
**Subject:** [External] RE: PCB-071 Discovery Requests  
**Date:** Tuesday, November 14, 2023 3:35:42 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Mr. Pratapas,

If you have discovery requests in the form of Interrogatories, please feel free to send them in the proper format and we will do our best to answer them. I think it appropriate to do things the proper way so that there is a clear record of everyone's responses. In the meantime, please answer the outstanding discovery we sent to you on October 20.

Thank you,

Phil



**Phillip A. Luetkehans**  
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**From:** Paul Pratapas <[paulpratapas@gmail.com](mailto:paulpratapas@gmail.com)>  
**Sent:** Friday, October 20, 2023 2:19 PM  
**To:** Giovanni Padilla <[GP@LBGALAW.COM](mailto:GP@LBGALAW.COM)>  
**Cc:** Brown, Don <[Don.Brown@illinois.gov](mailto:Don.Brown@illinois.gov)>; Phil Luetkehans <[pal@lbgalaw.com](mailto:pal@lbgalaw.com)>  
**Subject:** Re: PCB-071 Discovery Requests

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

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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](mailto: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  
Luetkehans, Brady, Garner & Armstrong, LLC  
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