

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

Paul Christian Pratapas,)

)

Complainant,)

) PCB No: 23-071

v.) (Citizens Enforcement – Water))

)

,)

)

Respondent)

Village of Woodridge)

**COMPLAINANT'S RESPONSE TO REQUEST
FOR PRODUCTION OF DOCUMENTS**

DOCUMENTS REQUESTED

1. All documents identified, referenced, or relied upon when preparing Complainant's Answers to Interrogatories.

RESPONSE: Answers were from memory and I didn't re examine the pictures. The site was worse than I remember with several improperly parked vehicles, dirt roads throughout the site, cement trucks washing out on the road where the SWPPP signage should be and zero protection at the construction entrance which again had a cut out curb with a steep grade leading offsite.

2. Any and all photographs that Complainant took of the site, including, but not limited to, any photographs that support Complainant's allegations.

RESPONSE: All pictures were submitted with the original complain, but can also be found archived at <https://mega.nz/folder/cYJEUOTL#2wg8RXtgItcHD56pDmF5vg>

3. Any and all documents that support Complainant's allegation of excess or improper discharge of pollutants.

RESPONSE: I was interfered with by Respondent in my journey to obtain this information within a reasonable amount of time to ensure it's integrity for the purposes of this and any other proceedings. Any attempts to follow up were highly discouraged by the previous behavior of the Woodridge Police and permitted parties which has often required immediate cooperation with the police to ensure my rights and safety..

4. Any correspondence or documents related to and/or supporting the allegations contained in the Complaint.

RESPONSE: I was interfered with by Respondent in my journey to obtain this information within a reasonable amount of time to ensure it's integrity for the purposes of this and any other proceedings. Any attempts to follow up were highly discouraged by the previous behavior of the Woodridge Police and permitted parties which has often required immediate cooperation with the police to ensure my rights and safety.

5. Any and all documents that support petitioner's allegation of fraudulent SWPPP Inspection reports and contractor certifications.


RESPONSE: I was interfered with by Respondent in my journey to obtain this information within a reasonable amount of time to ensure it's integrity for the purposes of this and any other proceedings. Any attempts to follow up were highly discouraged by the previous behavior of the Woodridge Police and permitted parties which has often required immediate cooperation with the police to ensure my rights and safety.

6. Copies of any filed complaints or grievances filed by Complainant against the Woodridge Police Department.

RESPONSE: These were sent via email to the Chief of Police in Woodridge and are no longer on my computer or in my email. The Chief said the officer in question did nothing wrong in condoning and perpetuating a USCWA prohibited discharge off of a construction site and onto a DuPage County Public Road, the contractor said he was not pumping dirt water and that he was allowed to do it. Both blatant lies.

AFFIDAVIT OF COMPLIANCE WITH
REQUEST FOR PRODUCTION OF DOCUMENTS

I, the undersigned, do hereby certify that a copy of a Response to Request for Production of Documents and exact copies of documents produced by Complainant, Paul Christian Pratapas, in response to the said Response to Request for Production of Documents were included as a link on this response and served upon Respondent. Complainant further states that he has produced copies of any and all documents in his possession to the best of his knowledge and belief, production is complete in accordance with the said Request for Production of Documents.

 12/02/2023
Paul Christian Pratapas
Complainant

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