

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PAUL CHRISTIAN PRATAPAS, )  
 )  
 Complainant, )  
 )  
 v. ) PCB No. 2024-042  
 )  
 LEXINGTON HOMES, )  
 )  
 Respondent. )

**NOTICE OF FILING**

To: *SEE ATTACHED SERVICE LIST*

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board the **Respondents, LEXINGTON TRACE LLC and LEXINGTON TRACE 2 LLC's, Supplement to Motion to Dismiss and for Monetary Sanctions Against Paul Christian Pratapas**, a copy of which is herewith served upon you.

Date: January 24, 2024

By: /s/ Jason M. Metnick  
One of the attorneys for the Respondents,  
**LEXINGTON TRACE LLC and LEXINGTON  
TRACE 2 LLC**

Jason M. Metnick  
**MELTZER, PURTILL & STELLE LLC**  
125 S. Wacker Drive, Suite 2900  
Chicago, IL 60606  
Phone: 312-987-9900  
Email: [jmetnick@mpslaw.com](mailto:jmetnick@mpslaw.com)  
Firm ID: 33682

**AFFIDAVIT OF SERVICE by Non-Attorney**  
*(BY EMAIL & US MAIL)*

I, the undersigned, on affirmation state that this firm has served the attached **Respondents LEXINGTON TRACE LLC and LEXINGTON TRACE 2 LLC's Supplement to Motion to Dismiss and for Monetary Sanctions Against Paul Christian Pratapas** upon the following persons **[X] by email**, to the address listed below, from email address ([pdunne@mpslaw.com](mailto:pdunne@mpslaw.com)) on January 24, 2024 by or before 5:00 p.m.; and/or **[X] by US Mail** by depositing the document(s) in a U.S. Postal Service mailbox located at 125 S. Wacker Drive, Chicago, IL 60606, by or before 5:00 p.m. on January 24, 2024, with proper postage or delivery charges prepaid.

Paul Christian Pratapas  
1330 E. Chicago, #110  
Naperville, IL 60540  
[paulpratapas@gmail.com](mailto:paulpratapas@gmail.com)

  
\_\_\_\_\_  
Patrick Dunne

SUBSCRIBED AND SWORN TO BEFORE ME

this 24th day of January, 2024.

  
Notary Public



**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

Paul Christian Pratapas,	)	
	)	
Complainant,	)	
	)	
v.	)	PCB 2024-042
	)	
Lexington Homes,	)	
	)	
Respondent,	)	

**SUPPLEMENT TO MOTION TO DISMISS AND FOR MONETARY SANCTIONS  
AGAINST PAUL CHRISTIAN PRATAPAS**

Lexington Trace LLC and Lexington Trace 2 LLC, misnamed as “Lexington Homes” (collectively, “Respondents”), by and through their attorneys, Meltzer, Purtill & Stelle LLC, hereby supplement their Motion to Dismiss and for Monetary Sanctions Against Paul Christian Pratapas (“Complainant”) as follows:

1. On January 19, 2024 Respondents filed their Motion to Dismiss and for Monetary Sanctions Against Paul Christian Pratapas (the “Motion”). A copy of the Motion was emailed to Complainant on January 20, 2024.
2. On January 20, 2024 Complainant emailed the undersigned counsel for Respondents. A copy of said email is attached as Exhibit 1.
3. Among other egregious statement, Complainant’s email threatens Respondents with “felony charges and maximum prison time.” *See* Ex. 1, E-mail dated January 20, 2024.
4. Said threats are coupled with Complainant’s suggestion that Respondents should “start thinking of a number to offer [Complainant].” *See id.*
5. Complainant’s attempted coercion is unethical, and regrettably in line with his pattern of harassing Respondents through serial filings of formal complaints.
6. The Board has broad discretion in determining the imposition of sanctions. *IEPA v.*

*Celotex Corp.*, 168 Ill. App. 3d 592, 597 (3d Dist. 1988); *Modine Manufacturing Co. v. PCB*, 192 Ill. App. 3d 511, 519 (2d Dist. 1989).

7. Self-represented parties are subject to sanctions when the line is crossed. *See Kim v. Alvey, Inc.*, 322 Ill.App.3d 657, 673–74 (1st Dist. 2001); *Amadeo v. Gaynor*, 299 Ill.App.3d 696, 705–06 (2d Dist. 1998); *First Federal Savings Bank of Proviso Township v. Drivers Nat'l Bank of Chicago*, 237 Ill.App.3d 340, 346–47 (2d Dist. 1992).

8. Here, there is no doubt that Complainant's threats crossed the line. His threats of criminal prosecution unless Respondents yield to him and offer up money is unacceptable, inappropriate, and outside the bounds of morality and good behavior.

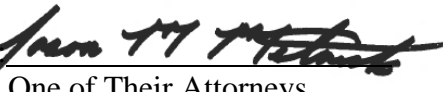
9. The imposition of monetary sanctions against Complainant under these circumstances is reasonable and necessary to curtail Complainant's threats.

#### CONCLUSION

For the foregoing reasons and as stated in the Motion to Dismiss and for Monetary Sanctions Against Paul Christian Pratapas, the Board should: (1) grant Lexington Trace LLC and Lexington Trace 2 LLC's Motion to Dismiss and for Monetary Sanctions Against Paul Christian Pratapas; (2) dismiss the Formal Complaint; and (3) enter monetary sanctions against Paul Christian Pratapas in the amount of Respondents' attorneys' fees incurred herein.

Date: January 24, 2024

**LEXINGTON TRACE LLC**  
**LEXINGTON TRACE 2 LLC**

By   
One of Their Attorneys

Jason M. Metnick  
**MELTZER, PURTILL & STELLE LLC**  
125 South Wacker Drive, Suite 2900  
Chicago, Illinois 60606  
(312) 987-9900  
jmetnick@mpslaw.com

# Electronic Filing: Received, Clerk's Office 1/24/2024

**From:** [Paul Pratapas](#)  
**To:** [Jason M. Metnick](#); [Patrick Dunne](#)  
**Cc:** [Neeshia Macanowicz](#)  
**Subject:** Re: [External] PCB 2024-042: Motion to Dismiss and for Monetary Sanctions against Paul Christian Pratapas  
**Date:** Saturday, January 20, 2024 9:46:53 AM  
**Attachments:** [mpslogo\\_3673f94c-229f-490d-aace-996b849a3bcb.png](#)

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I will be requesting maximum monetary damages for the acts of intimidation by your client and the need for Police protection on your client's site in violation of my constitutional rights.

I would start thinking of a number to offer me. I will probably be joining The Legendary Chicago Band Smashing Pumpkins. In which case, I won't be the one pursuing the case. You will most likely instead be dealing with the offices of Mark Geragos by way of my relationship with Podcaster Adam Carolla. So, I would think fast before he completely drains your client and they end up with felony charges and maximum prison time.

My wife is a former USDA restoration ecologist with expertise in protected wetlands like your client was attacking. So, I would think really fast.

Regards,

Paul Pratapas  
[www.peapod.services](http://www.peapod.services)

On Sat, Jan 20, 2024 at 8:59 AM Jason M. Metnick <[JMetnick@mpslaw.com](mailto:JMetnick@mpslaw.com)> wrote:

Mr. Pratapas – Please see the attached document that was filed in the above-referenced case.

Jason Metnick



**Jason M. Metnick** - Partner  
312-987-9900 (main) | 312-461-4310 (direct) | 312-953-5931 (mobile)  
847-892-4106 (fax) | [JMetnick@mpslaw.com](mailto:JMetnick@mpslaw.com)  
Chicago Office | [125 South Wacker Drive, Suite 2900, Chicago, Illinois 60606](#)

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