

# Electronic Filing: Received, Clerk's Office 02/20/2024

**From:** [Paul Pratapas](#)  
**To:** [Phil Luetkehans](#)  
**Cc:** [Halloran, Brad](#); [Brown, Don](#); [Giovanni Padilla](#); [epatt@robbinsdimonte.com](mailto:epatt@robbinsdimonte.com)  
**Subject:** [External] Re: FW: Pratapas Notice of Deposition  
**Date:** Monday, February 19, 2024 1:19:24 PM  
**Attachments:** [image001.png](#)  
[image001.png](#)

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There is not a valid reason for me to be deposed and it is wildly inappropriate for me be required to file discovery requests for information to be made available to the public at any reasonable time, without a pause in permit coverage.

A drivers license in IL is also an agreement to comply with blowing in a BAC devise when requested by an officer. If a driver refuses, is an automatic one year suspension of a drivers license. Without this same protection, polluters like your client can refuse to provide access and keep building and receiving new permits while destroying the planet. And the ILEPA can keep running a federally illegal program.

The hearing officer for this case is also on record in other cases of mine refusing to order access to SWPPP books. Given the total failure by ILEPA and The Board to properly implement federal law, it is improper to set any other precedent aside from immediate compliance with document requests as covered by the US Constitution.

All the information you are required to provide public access to must be allowed before documents and site conditions can be changed.

So, I will be seeking the FBI's help in compelling you to follow federal law without harassing me. There are 25 individual tips that need to be submitted individually which takes precedent over your delusional request. I am going to ask they take over all of this mess.

You are welcome to depose my dog who was there with me. Or my dad who worked at USEPA and has two police and a federal special agent in his family.

If after my reports are made, you would like to speak to me and the FBI, this can probably be arranged. But, I worked on the episode of Dateline NBC about Drew Peterson. And your client's officer is documented violating my rights on another related case, and another stalked and sexually harassed my hair stylist. So, priorities.

Regards,

Paul Pratapas

On Mon, Feb 19, 2024 at 12:07 PM Phil Luetkehans <[pal@lbgalaw.com](mailto:pal@lbgalaw.com)> wrote:

Mr. Pratapas,

My associate forwarded to me the below email you sent on Friday. You have been ordered to appear at your deposition this Thursday at 1:00 central time. By the below email, it appears that

you are again refusing to appear for your deposition, even though you agreed to us deposing you at that date and time in our last status hearing, after I was forced to file a Motion to Compel. I do not know what you are referring to about the "Board's unwillingness to order access to SWPPP books." However, I do know that you have been offered the opportunity to seek discovery and document production from my client, including the SWPP logs, and you decided not to avail yourself of that opportunity. If you stand by this position of refusing to be deposed, we will be forced to file a motion seeking dismissal of your complaint in this matter before the Illinois Pollution Control Board.

Please advise by the end of business today if that is still your position, so that we may proceed accordingly.

Very truly yours,

Phil Luetkehans



**Phillip A. Luetkehans**

Principal

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received this transmission in error, please immediately notify us by telephone, and delete the original message from your system. Thank you. LUETKEHANS, BRADY, GARNER & ARMSTRONG, LLC

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**From:** Paul Pratapas <[paulpratapas@gmail.com](mailto:paulpratapas@gmail.com)>  
**Sent:** Friday, February 16, 2024 6:56 PM  
**To:** Giovanni Padilla <[GP@LBGALAW.COM](mailto:GP@LBGALAW.COM)>  
**Cc:** Brown, Don <[don.brown@illinois.gov](mailto:don.brown@illinois.gov)>; Patt, Eric G. <[epatt@robbinsdimonte.com](mailto:epatt@robbinsdimonte.com)>; [brad.halloran@illinois.gov](mailto:brad.halloran@illinois.gov)  
**Subject:** Re: Pratapas Notice of Deposition

All,

I will be unable to participate. I need to file tips with the FBI regarding this widespread fraud

and The Board's unwillingness to order access to SWPPP books. But ordering depositions of citizens who file complaints.

If all Respondents contact the FBI and turn themselves in, it would save a lot of time.

We could call them together at the time designated to depose me.

Regards,

Paul Pratapas

On Fri, Feb 16, 2024 at 3:15 PM Giovanni Padilla <[GP@lbgalaw.com](mailto:GP@lbgalaw.com)> wrote:

All,

Attached is the notice of deposition for Mr. Pratapas for next Thursday. I will follow up with the zoom information once that is provided to me by the court reporter.

Thank you,

Giovanni Padilla



Giovanni Padilla

Luetkehans, Brady, Garner & Armstrong, LLC

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