

Electronic Filing: Received, Clerk's Office 04/18/2024

From: [Paul Pratapas](#)
To: [Madry, Erica](#)
Cc: [Halloran, Brad](#); [PCB.Clerks](#); [Neeshia Hee Macanowicz](#)
Subject: [External] Re: 2024in01334-LTR- eINITC- Halloran
Date: Thursday, April 18, 2024 12:48:37 PM
Attachments: [52052378-650C-4843-AE0F-DE0C74216E11.png](#)
[image001.png](#)

Here is the other. It lists Brad as hearing officer.

<https://pcb.illinois.gov/Cases/GetCaseDetailsById?caseId=17259>

The initial filing linked to the previous email explicitly states ILEPA is approving plans which are deficient in regards to complying with NPDES Permit Guidelines. And then Brad dismisses them without a report to the proper federal agency.

Here is a snapshot of the complainant asking the ILEPA to request assistance if they cannot keep up with the volume of work. Not to change the rules and let permittees do whatever they want.

Brad is dismissing cases While applying the rules to only one side. Conveniently, the side, which protects his job. He is not reporting the fraud, he is conspiring to undermine the primary enforcement mechanism of these permits.

His IMMEDIATE resignation is requested by me, and everyone else in Illinois who wants their natural resources protected in accordance with federal law.

Neeshia, You are a USDA ecologist specializing in grasslands and from IL. I would assume you don't want Brad letting construction companies destroy your federal research projects? And when people submit pictures where he is actively letting them destroy protected wetlands, you would like someone to step in? Or should he just dismiss all the cases because he works for the state?

In addition to the Respondent, I have filed a Formal Complaint against GW Glenview LLC which is Case #PCB 2021-006 and I have filed no less than nine Informal Complaints against other projects, ongoing and completed, within the Village of Glenview. EVERY one of these projects has a material deficiency in either application or execution.

My desire to file these complaints is an effort to shine a spotlight on the seemingly incomplete effort by all parties to protect our Village, our watersheds, our rivers, lakes, properties (public and private) and citizens. I am NOT seeking to block this project but rather am asking for the proper Stormwater Pollution mitigation efforts under the law.

Finally, if the IEPA is, in fact, ill equipped to handle the current volume of Notices of Intent I would urge the Pollution Control Board to consider asking the United States Environmental Protection Agency to step in and run NPDES Compliance efforts in the State of Illinois as they do for Massachusetts, New Hampshire, New Mexico, District of Columbia, U.S. territories, and on federal and tribal lands.

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On Thursday, April 18, 2024, 11:59 AM, Paul Pratapas <paulpratapas@aol.com> wrote:

Here is an additional case two years before I started filing the exact same complaints about the exact same thing by the exact same people.

The ILEPA implementing an illegal and unauthorized version of the NPDES permit program And refusing to provide public access to regulatory information for citizen enforcement.

This is one of two cases filed by the city of and a resident of Glenview, IL for failures of the ILEPA to properly implement a federal program.

Regardless of formatting and procedural constraints. As an attorney and government employee trusted with the well-being of the residence of Illinois. Brad should have reported the fraud to OIG. Instead, Brad. condoned and made decisions to dismiss which by default demonstrated the State of IL condoning and assisting in ilegal activity.

just one instance of a permit holder intentionally and knowingly refusing access to the stormwater binder and threatening to call the police because they don't know the laws is enough to warrant a report to OIG. And Brad was provided with dozens of photographs and other text messages all of which are undeniable Evidence of fraud and waste within a federal program implemented by a state agency.

He did not make the necessary reports. He instead conspired with the offenders to continue the racket. Also known as a continuing criminal enterprise. A violation of United States RICO Act. Resulting in my entire caseload being referred to the FBI.

You cannot tell the citizens enforcing that they have to follow every single rule to the T or cases will be dismissed at the same time letting federal permit holders make up their own rules and totally circumvent the primary enforcement mechanism.

Personally, I think Brad should be arrested And charged along with the permit violators as part of the conspiracy.

When bound by a contractor certification which states the signer understands and accepts responsibility for their Permit requirements. They may not totally violate those requirements, Refuse access to regulatory materials supposed to be made available to the public, and then hire an attorney to make fall statements on their behalf to sway the board.

They cannot argue whether or not they polluted or violated the permit. they can only argue to which degree given the photographic evidence provided.

Most Of the guidelines were discussing do not have thresholds. It is a presence absence. If there is no regulatory signage up and I take a picture, that cannot be

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argued. That is violating the contractor certification and an attorney making materially false statements.

Concrete washout areas in total violation photographed on a Saturday cannot be argued just a discussion of the degree of pollution.

And if I'm the only one who knows the rules and the Illinois EPA says it's all OK, You need to report that to someone else.

so as we all sit here today, the Illinois pollution board, and the attorneys who run it have been aware of fraud within a federal program implemented by a state agency for no less than four years without taking action against anyone other than the citizens filing complaints.

<https://pcb.illinois.gov/documents/dsweb/Get/Document-103845>

[Sent from the all new AOL app for iOS](#)

On Tuesday, April 16, 2024, 8:06 AM, Madry, Erica <EMadry@iardc.org> wrote:

Attached please find correspondence from the Attorney Registration and Disciplinary Commission.

Email is now the preferred method of communication for ARDC matters. Please send any email communications regarding this matter to emadry@iardc.org.

If you have any questions or need to speak with a member of our staff, please call our general number: (312) 565-2600.

On behalf of John R. Cesario.

Erica D. Madry

Attorney Registration & Disciplinary Commission
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