

March 16, 2006

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MAR 20 2006

STATE OF ILLINOIS  
Pollution Control Board

**PETITION FOR REVIEW**

*AC06-20*

Illinois Environmental Protection )  
Agency, )  
Complainant, )  
vs. )  
Georgia Shank and )  
Steve Shank, )  
Respondents )

(IEPA no. 459-05-AC)

**MOTION TO DISMISS**

Respondents move to dismiss due to the following relevant facts-

1. Property is not an open dump.
2. Respondent (s) do not operate a facility at Route 40 and Elm Street in Greenville, IL. It is vacant land.
3. Kendall Couch has never made a complete inspection of said property.

Response to false accusations of purported violations.

1. Respondent (s) have not caused or allowed an open dumping of waste.
2. Respondent (s) did not cause or allow open burning.
3. Respondent (s) have the right to store, on a temporary basis, certain clean construction debris.

Respondent (s) now respectfully request dismissal of administrative citation.

*Georgia C. Shank*

*Steve Shank*

cc: Senator Frank Watson  
cc: Representative Ron Stephens