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STATE OF ILLINOIS
Pollution Control Board

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
ADMINISTRATIVE CITATION

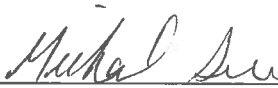
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
Complainant,) AC 13-17
v.) (IEPA No. 219-12-AC)
AAD FAMILY FARMS, LLC,)
Respondent.)

NOTICE OF FILING

To: Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 61794-9276

Please take notice that on this date I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois the following instrument(s) entitled PETITION FOR REVIEW, CERTIFICATE OF SERVICE, and NOTICE OF APPEARANCE.

RESPECTFULLY SUBMITTED BY:



Michael Sue, Attorney for Respondent

LAW OFFICES OF WARREN DANZ
710 NE JEFFERSON
PEORIA, IL 61603
(309) 676-4645
FAX: (309) 676-6724

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(IEPA No. 219-12-AC)

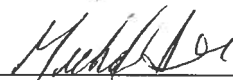
PETITION FOR REVIEW

Now comes AAD Family Farms, LLC by and through it's attorney, Michael Sue, and requests a Petition for Review and in support thereof states the following:

1. That AAD Family Farms, LLC has been operating as a family farm zoned agricultural in Woodford County and has operated through the family for over 70 years as a family dairy farm.
2. That the family farm currently is being managed out by residents who are outside of the area and do not live on the premises nor do have access on a daily or frequent basis to observe the property.
3. That the complainant's conclusion that the respondent has caused or allowed the dumping of waste is in error, inasmuch as such cited in sub paragraph 1,2, and 3. The respondent has either not had direct knowledge or has not directly caused or allowed the dumping of any waste in the manner as cited.
4. That the information herein is that unknown individuals may have committed such as the dumping of waste on the property since there is no person who lives on the property and there is no person who actively manages the property.
5. That the respondent AAD Family Farms denies that a person cost or allowed the burning of refuse or allowed the discharge or omission of any contaminate or allowed any open dumping of waste as referenced herein.
6. That the respondent denies the existence of a waste disposal or denies the act of open dumping.
7. That the above grounds is zoned agricultural and conforms accordingly.

Wherefore, the Respondent, WARREN DANZ, asks that the administrative citation of \$4,500 fine be vacated and that the above cause be dismissed.

Respectfully Submitted by:



Michael Sue, Attorney for Respondent

WARREN DANZ LAW OFFICE
710 NE JEFFERSON
PEORIA, IL 61603
(309) 676-4645
FAX: (309) 676-6724

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Respondent.)

AC 13-17
(IEPA No. 219-12-AC)

NOTICE OF APPEARANCE

Notice is hereby given of the entry of the undersigned as counsel for the Respondent, AAD FAMILY FARMS, LLC, in the above-entitled action.

Respectfully Submitted by:



Michael Sue, Attorney for Respondent

LAW OFFICES OF WARREN DANZ
710 NE JEFFERSON
PEORIA, IL 61603
(309) 676-4645
FAX: (309) 676-6724

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ADMINISTRATIVE CITATION

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Respondent.)

AC

13-17

(IEPA No. 219-12-AC)

CERTIFICATE OF SERVICE

I, the undersigned, certify that I mailed on October 30, 2012, with postage thereon fully prepaid, by depositing said envelope in a United States Post Office Box a true and correct copy of the PETITION FOR REVIEW, NOTICE OF FILING, CERTIFICATE OF SERVICE and NOTICE OF APPEARANCE to the following:



Michael Sue, Attorney for Respondent

Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, IL 60601

Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 61794-9276

LAW OFFICE OF WARREN DANZ
710 NE JEFFERSON
PEORIA, IL 61603
(309) 676-4645
FAX: (309) 676-6724

WARREN E. DANZ, P.C.

WARREN E. DANZ
MICHAEL A. SUE

Law Offices

710 N.E. JEFFERSON STREET
PEORIA, ILLINOIS 61603

TELEPHONE 309-676-4645
FAX NUMBER 309-676-6724
DECATUR 217-423-2563
SPRINGFIELD 217-529-5588
DANVILLE 217-431-3151

October 30, 2012

Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, IL 60601

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STATE OF ILLINOIS
Pollution Control Board

Re: Illinois Environmental Protection Agency vs. AAD Family Farms, LLC
AC
IEPA No. 219-12-AC

A 219-12

To Whom It May Concern:

Please file the enclosed documents for the above case and send back a copy in the self addressed stamped envelope. If you have any questions, I can be reached at (309) 676-4645.

Sincerely,

Michael Sue

Michael Sue
MS/rr

ORIGINAL
FILED IN ENVELOPE