

Luke J. Esch (64155)
Wyoming Attorney General's Office
123 Capitol Building
Cheyenne, Wyoming 82001
(307) 777-6946

IN THE DISTRICT COURT FOR THE FIRST JUDICIAL DISTRICT
IN AND FOR LARAMIE COUNTY, STATE OF WYOMING

PEOPLE OF THE STATE OF WYOMING,)
)
Plaintiffs,)
)
vs.)
)
FREMONT COUNTY SOLID)
WASTE DISPOSAL DISTRICT)
)
Defendant.)

Civil No. 175-413

FILED
FEB - 2 2010

COMPLAINT

GERIE E. BISHOP
CLERK OF THE DISTRICT COURT

Plaintiffs, People of the State of Wyoming, by the Wyoming Attorney General's Office,
state:

PARTIES, JURISDICTION AND VENUE

1. This civil action is brought by the Wyoming Attorney General's Office in the name of the People of the State of Wyoming as Plaintiffs, pursuant to WYO. STAT. ANN. § 35-11-903(c).

2. Defendant, Fremont County Solid Waste Disposal District (Fremont County SWDD), is a "person" under WYO. STAT. ANN. § 35-11-103(a)(vi).

3. This Court has jurisdiction over the parties and the subject matter in this civil action under WYO. STAT. ANN. § 35-11-901(a), and venue is proper in Laramie County pursuant to WYO. STAT. ANN. § 35-11-903(c).

4. The administrative proceedings in the Environmental Quality Council (Council) have been exhausted in this case and this matter is now proper in this Court.

CLAIM FOR RELIEF

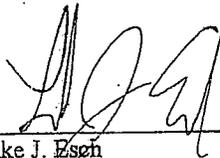
5. At the times relevant to the allegations in this complaint, Fremont County SWDD has owned and/or operated the Dubois landfill located in Fremont County, Wyoming.

6. On October 28, 2008, the Wyoming Department of Environmental Quality (DEQ) issued Notice of Violation and Order (NOV) # 4385-08 to Fremont County SWDD for violating the Wyoming Solid Waste Rules and Regulations (WSWRR).

C. This Court assess appropriate penalties against Defendant as provided in Section 901(a) and 903(c) of the Act, WYO. STAT. ANN. §§ 35-11-901(a) and 903(c); and

D. This Court award such other and further relief as it deems appropriate.

DATED this 2nd day of February, 2010.



Luke J. Esch
Assistant Attorney General
123 Capitol Building
Cheyenne, Wyoming 82002
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