

**IN THE IOWA DISTRICT COURT FOR GUTHRIE COUNTY**

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STATE OF IOWA, ex rel., IOWA )  
DEPARTMENT OF NATURAL )  
RESOURCES (99AG23542), )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
DONALD DEAN WILLIAMS d/b/a )  
WILLIAMS OIL COMPANY, )  
 )  
Defendant. )

**LAW NO.** \_\_\_\_\_

**PETITION AT LAW**

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COMES NOW Plaintiff State of Iowa, ex rel., Iowa Department of Natural Resources ("DNR") and for its claims against Defendant Donald Dean Williams d/b/a Williams Oil Company ("Williams") states as follows:

**Introduction**

1. The release of petroleum from underground storage tanks ("USTs") is a substantial public concern because it threatens public health and safety and the natural resources of the state. Williams violated petroleum UST requirements at a site located at 201 West Front Street, Stuart, Iowa, by failing to remove free product, complete a free product assessment report, submit free product recovery reports, install a permanent free product recovery system, and to prepare and submit a corrective action design report. The State of Iowa, therefore, brings this action seeking assessment of a civil penalty and issuance of a permanent injunction against Williams.

**Parties**

2. The State of Iowa is a sovereign state of the United States of America and brings this action on behalf of the DNR, a duly constituted agency of the State of Iowa. *See* Iowa Code § 455A.2 (2005).