UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION I

IN THE MATTER OF:)
Landmark Real Estate Management, In) nc.)
Solo Affordable Housing Solutions, LLC	-
Solo Development 2004, LLC)
Minbar Properties, LLC)
87 Bartlett Street Associates, LLC)
P.O. Box 891)
Lewiston, MA 04243) EPA Docket Number
) TSCA-01-2009-0106
LA Italian Properties, LLC)
P.O. Box 4510)
Portland, ME 04112)
)
Travis Soule dba Fish Properties)
19 Woodland Way)
New Gloucester, ME 04620)
)
Respondents.)
)

MOTION FOR DEFAULT ORDER

The Complainant, the United States Environmental Protection Agency, Region 1 ("the Region"), moves for the issuance of an order under 40 C.F.R. § 22.17, finding that (1) Landmark Real Estate Management, Inc.; Solo Affordable Housing Solutions, LLC; Solo Development 2004, LLC; Minbar Properties, LLC; 87 Bartlett Street Associates, LLC; LA Italian Properties, LLC; and Travis Soule dba Fish Properties (collectively "Respondents") defaulted in this matter; (2) Respondents violated Section 409 of the Toxic Substances Control Act, 15 U.S.C. § 2689; the Residential Lead-Based Paint Hazard Reduction Act of 1992, 42 U.S.C. §§ 4851 *et seq.*; and the federal regulations promulgated thereunder, set forth in 40 C.F.R. Part 745, Subpart F; and (3) Respondents must pay a civil penalty of \$227,700. In support of its motion, the Region submits the attached Memorandum in Support of Default Order, as well as a Proposed Default Order.

Respectfully submitted,

Date: 4.9.10

Amanda J. Helw/g Enforcement Counsel U.S. EPA, Region 1