

EPA Docket Number TSCA 01-2009-0066  
In the Matter of Douglas Paulino

Complainant's Memorandum in Support of Default Motion  
LIST OF EXHIBITS

- Exhibit 1 Complaint and Notice of Opportunity for Administrative Hearing, dated September 28, 2009
- Exhibit 2 Certified Mail Return Receipt for Complaint
- Exhibit 3 E-mail message from Regional Hearing Clerk to Catherine Smith, dated November 10, 2009
- Exhibit 4 Respondent's Response to EPA Subpoena, dated August 20, 2008
- Exhibit 5 Property information printed from City of Hartford, CT, Assessor's Office website on May 18, 2009
- Exhibit 6 Disclosure Rule Tip/Complaint Form, dated August 23, 2006
- Exhibit 7 EPA Subpoena issued to Respondent, dated August 9, 2007; memorandum from EPA Investigator James E. Israel regarding service of Subpoena, dated August 10, 2007; follow-up Subpoena Notice of Non-Compliance, dated November 2, 2007 and memorandum from EPA Investigator James E. Israel regarding service of Subpoena Notice of Non-Compliance, dated November 2, 2007
- Exhibit 8 Petition to Enforce TSCA Subpoena, dated May 19, 2008 (exhibits not included)
- Exhibit 9 EPA Inspector Ronnie Levin's handwritten notes taken during meeting with Respondent on August 25, 2008; Memorandum to File from Ronnie Levin and Alma Padilla re. Meeting with Douglas Paulino re. Subpoena Response; and e-mail message from Ronnie Levin to Catherine Smith, dated August 28, 2009
- Exhibit 10 Memorandum to File, dated April 8, 2009, re. April 6, 2009 Inspection of Douglas Paulino by Inspectors Ronnie Levin and Alma Padilla
- Exhibit 11 Letter from Lead Action for Medicaid Primary Prevention Project, Connecticut Children's Medical Center, to Respondent, dated December 9, 2004, and *Visual Risk Assessment and Scope of Services to Reduce Potential Lead Hazards* ("TRC Report") regarding 11 Orange Street, 2<sup>nd</sup> Floor, dated December 2004

- Exhibit 12 Notice of Lead-Based Paint Violation from the City of Hartford, CT, to Respondent, dated August 21, 2008 and State of Connecticut Department of Public Health *Lead Inspection Report Form*, dated August 20, 2008
- Exhibit 13 Residential Lease between Blanca Maldonado and Respondent, dated February 1, 2009
- Exhibit 14 *EPA Section 1018 - Disclosure Rule Enforcement Response and Penalty Policy*, dated December 2007
- Exhibit 15 Lead Pamphlet: *Protect Your Family from Lead in Your Home*
- Exhibit 16 Requested Standard Financial Documentation
- Exhibit 17 Bankruptcy Voluntary Petition filed by Respondent on July 15, 2008, Voluntary Dismissal of Voluntary Petition filed by Respondent on July 21, 2008, and other bankruptcy-related research
- Exhibit 18: April 13, 2010 Updated Research on Douglas Paulino's Property Holdings from City of Hartford, CT, Assessor's Office Web Site
- Exhibit 19: Penalty Chart
- Exhibit 20: Cited Environmental Appeals Board Cases, including:  
*In Re New Waterbury, Ltd.*, 5 E.A.D. 529 et seq. (1994)  
*In Re Spitzer Great Lakes, Ltd.*, 9 E.A.D. 302 et seq. (2000)  
*In Re Donald Cutler*, 11 E.A.D. 622 et seq. (2004)  
*In Re CDT Landfill Corp.*, 11 E.A.D. 88 et seq. (2003)