

**U. S. ENVIRONMENTAL PROTECTION AGENCY  
REGION 7  
11201 RENNER BOULEVARD  
LENEXA, KANSAS**

**BEFORE THE ADMINISTRATOR**

**In the Matter of:** )  
 )  
THE ASKINS DEVELOPMENT ) **Docket No. TSCA-07-2019-0280**  
GROUP, LLC, )  
 )  
 )  
Respondent. )

**MOTION FOR DEFAULT ORDER**

Pursuant to Rules 22.16 and 22.17 of the Consolidated Rules of Practice, 40 C.F.R. §§ 22.16 and 22.17, Complainant, the Director of the Enforcement and Compliance Assurance Division, United States Environmental Protection Agency, Region 7, hereby moves this Court for entry of an initial decision and default order against Respondent, The Askins Development Group, LLC, on Counts 1, 2, 3, 4, 5, 6, 7, 8, and 9 of the Complaint, for Respondent’s failure to timely file an answer to the Complaint. Furthermore, Complainant seeks imposition of a \$42,003 civil penalty against Respondent for the violations alleged in the Complaint.

Concurrent with this Motion, Complainant has filed a Memorandum of Points and Authorities in Support of Complainant’s Motion for Default Order as well as Proposed Findings of Fact, Conclusions of Law, Default Order, and Initial Decision.

Respectfully submitted,

Dated: \_\_\_\_\_

\_\_\_\_\_  
Britt Bieri  
Assistant Regional Counsel  
U.S. Environmental Protection Agency,  
Region 7  
Attorney for Complainant

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion for Default Order was sent electronically on February 18, 2021 to the Regional Hearing Clerk of the U.S. Environmental Protection Agency, Region 7, at R7\_Hearing\_Clerk\_Filings@epa.gov.

A true and correct copy of the foregoing document was also sent by certified mail, return receipt requested, on February 18, 2021 to:

National Registered Agents, Inc.  
120 South Central Avenue, Suite 400  
Clayton, Missouri 63105  
*Registered Agent for The Askins Development Group, LLC*

A true and correct copy of the foregoing document was also sent by certified mail, return receipt requested, and by e-mail, on February 18, 2021 to:

Dan J. Kazanas  
Kazanas LC  
321 West Port Plaza Drive, Suite 201  
Saint Louis, Missouri 63146  
[REDACTED]  
*Attorney for The Askins Development Group, LLC*

and

The Askins Development Group, LLC  
5753-G East Santa Ana Canyon Road #602  
Anaheim Hills, California 92807  
[REDACTED]  
*Respondent*

\_\_\_\_\_  
Britt Bieri  
Assistant Regional Counsel  
U.S. Environmental Protection Agency,  
Region 7  
Attorney for Complainant