

22. Admitted upon information and belief.

23. Admitted.

24. Denied as stated. It is admitted that Respondent Amocetia Beckford set up Beckford Rentals, Inc. as a for-profit corporation in Pennsylvania with the intention of utilizing the corporate entity in her real estate business. However, it is denied that Beckford Rentals, Inc. was an agent of the Respondent. To the contrary, Respondent, Amocetia Beckford utilized the trade name "Beckford Rentals" in transacting her real estate sales and management business.

25. Admitted.

26. Admitted upon information and belief.

27. Admitted.

28. Admitted.

29. Admitted.

30. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 30 and the same are denied accordingly.

31. Admitted

32. Admitted.

33. Admitted.

34. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 34 and the same are denied accordingly.

35. Admitted

36. Admitted.

37. Admitted.

38. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 38 and the same are denied accordingly.

39. Admitted

40. Admitted.

41. Admitted.

42. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 42 and the same are denied accordingly.

43. Admitted

44. Admitted.

45. Admitted.

46. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 46 and the same are denied accordingly.

47. Admitted

48. Admitted.

49. Admitted.

50. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 50 and the same are denied accordingly.

51. Admitted

52. Admitted.

53. Admitted.

54. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 54 and the same are denied accordingly.

55. Admitted

56. Admitted.

57. Admitted.

58. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 58 and the same are denied accordingly.

59. Admitted

60. Admitted.

61. Admitted.

62. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 62 and the same are denied accordingly.

63. Admitted

64. Admitted.

65. Admitted.

66. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 66 and the same are denied accordingly.

67. Admitted

68. Admitted.

69. Admitted.

70. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 70 and the same are denied accordingly.

71. Admitted

72. Admitted.

73. Admitted.

74. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 74 and the same are denied accordingly.

75. Admitted

76. Admitted.

77. Admitted.

78. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 78 and the same are denied accordingly.

79. Admitted

80. Admitted.

81. Admitted.

82. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 82 and the same are denied accordingly.

83. Admitted

84. Admitted.

85. Admitted.

86. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 86 and the same are denied accordingly.

87. Admitted

88. Admitted.

89. Admitted.

90. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 90 and the same are denied accordingly.

91. Admitted

92. Admitted.

93. Admitted.

94. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 94 and the same are denied accordingly.

95. Admitted

96. Admitted.

97. Admitted.

98. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 98 and the same are denied accordingly.

99. Admitted

100. Admitted.

101. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 101 and the same are denied accordingly. By way of further answer, Respondent is the current owner of the property located at 110 Jefferson Street, Reading, Pennsylvania.

102. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 102 and the same are denied accordingly.

103. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 103 and the same are denied

accordingly. By way of further answer, Respondent is the current owner of the property located at 129 Elm Street, Reading, Pennsylvania.

104. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 104 and the same are denied accordingly.

105. Denied. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 101 and the same are denied accordingly. By way of further answer, Ludel Black is the current owner of the property located at 151 Pear Street, Reading, Pennsylvania by a Deed recorded May 28, 1996.

106. After reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 106 and the same are denied accordingly.

IV. VIOLATIONS

107. Paragraph 107 is one of incorporation to which no response is required.

108. Admitted.

109. Admitted.

110. Denied. The averments of Paragraph 110 constitute conclusions of law to which no answer is required. To the extent that an answer is required, after reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 110 and the same are denied accordingly.

111. Paragraph 111 is one of incorporation to which no response is required.

112. Admitted.

113. Admitted.

114. Denied. The averments of Paragraph 114 constitute conclusions of law to which

no answer is required. To the extent that an answer is required, after reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 114 and the same are denied accordingly.

115. Paragraph 115 is one of incorporation to which no response is required.

116. Admitted.

117. Admitted.

118. Denied. The averments of Paragraph 118 constitute conclusions of law to which no answer is required. To the extent that an answer is required, after reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 118 and the same are denied accordingly.

119. Paragraph 119 is one of incorporation to which no response is required.

120. Denied. See Respondents Answers to Paragraphs 101, 103 and 105 hereinabove.

121. Denied. See Respondents Answers to Paragraphs 101, 103 and 105 hereinabove.

122. Denied. The averments of Paragraph 122 constitute conclusions of law to which no answer is required. To the extent that an answer is required, see Respondents Answers to Paragraphs 101, 103 and 105 hereinabove. By way of further answer, after reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 122 and the same are denied accordingly.

123. Paragraph 123 is one of incorporation to which no response is required.

124. Denied. See Respondents Answers to Paragraphs 101, 103 and 105 hereinabove.

125. Denied. See Respondents Answers to Paragraphs 101, 103 and 105 hereinabove.

126. Denied. The averments of Paragraph 126 constitute conclusions of law to which no answer is required. To the extent that an answer is required, see Respondents Answers to Paragraphs 101, 103 and 105 hereinabove. By way of further answer, after reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 126 and the same are denied accordingly.

127. Paragraph 127 is one of incorporation to which no response is required.

128. Denied. See Respondents Answers to Paragraphs 101, 103 and 105 hereinabove.

129. Denied. See Respondents Answers to Paragraphs 101, 103 and 105 hereinabove.

130. Denied. The averments of Paragraph 130 constitute conclusions of law to which no answer is required. To the extent that an answer is required, see Respondents Answers to Paragraphs 101, 103 and 105 hereinabove. By way of further answer, after reasonable investigation, Respondent is without knowledge or information to admit or deny the averments contained in Paragraph 130 and the same are denied accordingly.

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WHEREFORE, Respondents, Amocetia Beckford and Beckford Rentals, Inc., respectfully requests that the EPA and the hearing examiner dismiss the within Administrative Complaint, or in the alternative, consider mitigating factors, including but not limited to Respondents financial condition and ability to pay any penalties imposed..

Respectfully submitted,



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Attorneys for Respondents
Amocetia Beckford and Beckford Rentals, Inc.

Dated: January 24, 2011

CERTIFICATE OF SERVICE

I, **Dominic A. DeCecco, Esquire**, hereby certify that on January 24, 2011, I served true and correct copies of the within *Respondents' Answer to Administrative Complaint, Respondents' Request for Settlement Conference and Respondents' Request for Hearing* in the above-captioned matter via overnight mail addressed to the following individuals:

Regional Hearing Clerk
EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

and

Louis F. Ramalho, Senior Assistant Regional Counsel
U.S. EPA Region III
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