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**From:** [Deryl Brown](#)  
**To:** [R7 Hearing Clerk Filings](#)  
**Cc:** [Pessetto, Jared \(he/him/his\)](#)  
**Subject:** EPA Docket No. TSCA-07-2022-0124 / Landis Collections LLC , Answer to EPA complaint filing  
**Date:** Wednesday, February 8, 2023 2:34:41 PM

Received by  
EPA Region 7  
Hearing Clerk

ATTN: Regional Hearing Clerk & whomever this may concern,

This is my formal response / answer to paragraph 59 (p.14) of the EPA's Complaint which stipulates that Landis Collections LLC must file a written answer within 30 days of receipt of the Complaint, a deadline that ends today 2/8/23.

I spoke with EPA attorney Jared Pessetto today & we agreed to a meeting , scheduled for further discussion of EPA's proposed civil penalty for violations of the Renovation, Repair, and Painting Rule alleged in the "Complaint and Notice of Opportunity for Hearing" that EPA filed on January 9, 2023. In concluding our call today, we agreed to continue discussion during an initial settlement conference next Thursday, February 16, at 10:00 AM Pacific/12:00 PM Central.

Furthermore, I am the sole proprietor and manager of Landis Collections LLC and I will present for this phone call.

As the owner of a small business I apologize if I didn't abide by guidelines beyond my knowledge which in this case in this matter at hand. I had no idea that these EPA existed. I had no knowledge of lead paint and the seller's disclosure during the purchase of properties typically states that there is no lead base paint in the disclosures signed during acquisition and re-sale of real estate / properties. The EPA showed up to a property that Landis Collections LLC was renovating and the workers on the premises had no authority to allow entry without speaking to myself the owner. I was on vacation at the time and my calls were forwarded to my project manager for this project and he also had no authority to allow anyone on the premises without prior notice. The city inspector and or police are the only outsiders that they are ever instructed to allow entry without proper notifications.

I contest the material facts on which the complaint is based , I contend & believe that the penalty proposed in the complaint is inappropriate. I contend that the penalties are far too extreme , serve no lawful or factual basis on these allegations which can also bankrupt a small business like Landis Collections LLC, an entity that has never had any prior allegations, nor the finances to hire proper legal representation. I contend that I am entitled to judgement as a matter of law and the allegations have no basis in law. I am merely a small business trying to survive the current hardships in the current state of the real estate market. My renovations are always inspected by the city and home inspectors and are always sold with lead base paint disclosures in acquisition and re-sale closing docs which I can provide. As a business Landis Collections LLC provides a service to blighted areas of the city, renovating vacant & distressed properties which are sold to working class, tax paying home owners. These beautiful homes are never sold or purchased within knowledge of lead base paints, asbestos or anything harmful to another human being. Please feel free to let me know if you need anything further. Have a blessed day & week.

Best regards,

**Deryl Brown Jr.**  
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