

8-21-09

RE: DOCKET NO.
T.S.C.A - 05-2008
-0019.

TO: THE CLERK

PLEASE RETURN A STAMP
DOCKET FILE, TIME AND DATE, IN
CASE, I HAVE TAKEN SECOND
STEP TO OBTAIN RECORDS FROM
THE OENC, METROPOLITAN HOUSING AUTHORITY
SECTION DIVISION.

THANKING YOU VERY MUCH
YOUR FULL COOPERATION, CONCERNING
THIS INSTANT MATTER OF THE ENCLOSED
DOCUMENT.

Respectfully,

Vennie Wilson
P.O. BOX # 317639
CINC. OH. 45231

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AUG 24 2009
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IN THE UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY REGION (5)
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS, 60604-3590

IN THE MATTERS OF
DIRECTOR OF THE U.S.
E.P.A. ADMINISTRATIVE
DEPARTMENT OF LAND &
CHEMICAL DIVISION
AGENCY REGION (S)

COMPLAINANT

-VS-

MARDAPH II, L.L.C.;
MARDAPH III, L.L.C.;
AND VINNIE WILSON
OF CINCINNATI, OHIO

RESPONDENT'S

STATE OF OHIO }
COUNTY OF HAMILTON } SS%

ACTION DOCKET
NUMBER - T.S.C.A -
05-2008-0019

RESPONDENT'S FIRST
WRITTEN REQUEST
FOR PRODUCTION OF
RECORD OFFICE FILES &
DOCUMENTS TO THE
"C.M.H.A" SECTION (8)
OFFICE DIVISION
HOUSING PROGRAM
APPLICANTS

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PURSUANT TO THE U.S. E.P.A.'S
ADMINISTRATIVE PROCEEDINGS "CIVIL
PENALTIES SOUGHT AGAINST THE SAID
RESPONDENT'S, MARDAPH II L.L.C.; MARDAPH
III, L.L.C.; AND VINNIE WILSON IN THE
ABOVE CAPTIONED CASE NUMBER.

(1)

THE SAID UNDERSIGNED RESPONDENT VINNIE WILSON, AGENT AND OWNER OF THE TWO SAID CORPORATIONS, HEREIN PROBE" CAPACITY, WHO HEREBY RESPECTFULLY REQUEST FOR A PRODUCTION OF DOCUMENTS RECORD OFFICE FILES IN THE CUSTODY OF THE CINCINNATI METROPOLITAN " HOUSING AUTHORITY'S CUSTODY AND CARE OFFICE DEPARTMENT SECTION(8) PROGRAM.

RESPONDENT'S FURTHER REQUEST FOR A DISCLOSURE AND INSPECTION OF COPIES OF PHOTOGRAPHS OF THE SAID FOLLOWING NAMED LIST HEREOF:

(A) WRITTEN TRIPPLE CONTRACT AGREEMENT LEASE PAYMENT OF TENANTS, LANDLORD AND C.M.H.A SECTION (8) APPLICANTS SIGNED DOCUMENT WITH RESPONDENT'S AGENT VINNIE WILSON, OF (10) RESIDENTIAL RENTAL UNITS.

(B) WRITTEN TRIPPLE CONTRACT AGREEMENT ACKNOWLEDGEMENT OF WARNING STATEMENTS DOCUMENT TO TENANTS PAMPHETS FOR LEAD BASED PAINT TO ALL (10) RESIDENTIAL RENTAL TENANTS BY RESPONDENT'S VINNIE WILSON.

(C.) NAMES, ADDRESS, AND DATES OF ALL (10) RESIDENTIAL RENTAL UNIT INSPECTION EXAMINATION OF EACH (10) HOUSING UNITS BY C.M.H.A SECTION (8) HOUSING SPECIALIST OF RESPONDENT'S PROPERTIES DOCUMENTS.

(2.)

PAST RESIDENTIAL RENTAL UNIT
TENANT LEASES THROUGH C.M. HA SECTION
(8) APPLICANT PROGRAM OF THE RESPONDENT'S
HOUSING PROPERTIES. HANNE WILSON

- (1) GAINES JACKSON, 1530 KINNEY AVENUE, CINCINNATI, OHIO 45211, DATE: 8/1/05.
- (2) ANTOINETTE C. MCCRARY, AT 3341 MCHENRY AVENUE, CINCINNATI, OHIO 45211, DATE: 12/1/05
- (3) DONYA JACKSON AT 2639 FENTON AVENUE, CINCINNATI, OHIO 45211. DATE: 2/6/06
- (4) HELEN JORDAN, AT 2605 FENTON AVENUE CINCINNATI, OHIO 45211, 3/3/06 DATE:
- (5) KENDRA FRENCH AT 2637 FENTON AVENUE CINCINNATI, OHIO 45211 DATE: 2/27/07
- (6) TABETHA DORNAL, AT 2636 FENTON AVENUE CINCINNATI, OHIO 45211 DATE: 6-08-06
- (7) SHONNA WASHINGTON, AT 8750 VENUS DRIVE CINCINNATI, OHIO. 45211, DATE: 1/1/07
- (8) JAMES AND EVA FARMER, AT 4537 LUCERNE AVENUE, CINCINNATI, OHIO 45211 DATE: 9/1/05
- (9) BRENDA BEARD, AT 711 MARION ROAD CINCINNATI, OHIO 45215.
- (10) STEPHANIE HARRIS, AT 1815 CLARION AVE. CINCINNATI, OHIO 452. DATE: 11/3/07

(3.)

THE SAID UNDERSIGNED RESPONDENT VINNIE WILSON, RESPECTFULLY STATES THAT A COMPLETE LIST OF THE NAMES, AND RESIDENTIAL PAST RENTAL UNIT TENANTS, WHICH THE COMPLAINANT U.S. EPA INTENDS PRODUCE AS WITNESSES AND RESPONDENT'S FIRST WRITTEN REQUEST FOR PRODUCTIONS OF DOCUMENTS WAS NOT BEEN PROPERLY PROVIDE OR MADE ALL AVAILABLE TO THE COMPLAINANT.

RESPONDENT VINNIE WILSON FURTHER SAYETH NAUGHT;

!
x Vinnie Wilson
UNDER SIGNED RESPONDENT

SWORN TO AND SUBSCRIBED BEFORE,
ME, A NOTARY PUBLIC, IN MY PRESENCE,
ON THIS 21st DAY OF August 2009

Mary R. Childres
NOTARY PUBLIC;

MARY R. CHILDRES
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 02-12-12

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CERTIFICATE OF SERVICE

I, VENNIE WILSON, SAID UNDERSEIGNED RESPONDENT AGENT FOR THE TWO CORPORATIONS, HEREBY CERTIFY THAT A TRUE AND ACCURATE COPIES OF THIS DOCUMENT REQUEST FOR A PRODUCTION OF DOCUMENT RECORD FILES WAS SERVED UPON EACH PARTY OR PARTIES OF RECORDS BY VIA U.S. MAIL POSTUAL SERVICES ON THIS 21st DAY OF August 2009, AND FORWARDED TO:

(1) C/O - CINCINNATI METROPOLITAN HOUSING AUTHORITY, SECTION (8) OFFICE AT 1035 WESTERN AVENUE CINCINNATI, OHIO

(2) TWO (2) COPIES SENT TO: REGIONAL HEARING OFFICIAL CLERK, OF THE U.S. E.P.A REGION (5) 77 WEST JACKSON BOULEVARD CHICAGO, ILLINOIS, 60604-3590 - 5-E-19-J.

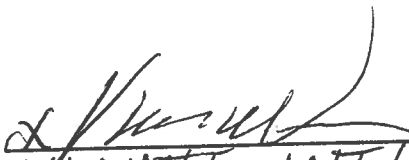
(3) COPY SENT TO THE OFFICE OF REGIONAL COUNSEL, U.S. E.P.A REGION (5) - C-14-J C/O - PETER FELTTL) ~~1035~~ WEST JACKSON BOULEVARD CHICAGO, ILLINOIS, 60604-3590

NOTE: CALL COMET

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AUG 24 2009

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VENNIE WILSON
PROSE LITIGANT
POST BOX NO 317639
CINCINNATI, OHIO 45231
PHONE: 513-616-2510
(RESPONDENT)