

The Law Offices of
Cassandra Collier-Williams, LLC

Cassandra Collier-Williams, Esq.
Anthony T. Parker, Esq.
Aaron D. Plasco, Esq.

April 22, 2009

Regional Hearing Clerk (E-13J)
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Re: In The Matter of: Kathryn Y. Lewis-Campbell, Springfield, Ohio
Docket Number: TSCA-05-2009-0004

Dear Sir or Madame:

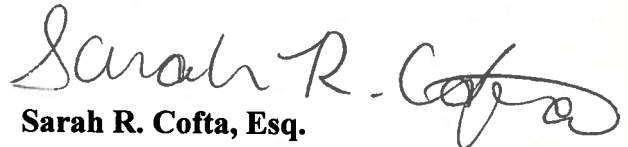
Enclosed please find the original and one (1) copy of the following documents, relative to the above captioned matter:

1. **Motion For Leave To File Amended Answer, Instanter;** and
2. **Amended Answer.**

Please file the above in the normal manner, and return the time stamped copy to me in the enclosed self addressed stamped envelope.

If you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,


Sarah R. Cofta, Esq.

SRC: rdc
Enclosures
cc: Richard R. Wagner, Esq.
Judge William b. Moran
Kathryn Y. Lewis-Campbell

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PROTECTION AGENCY

Cleveland Office:
2103 St. Clair Avenue • 2nd Floor • Cleveland, Ohio 44114 • Phone (216) 621-9190 • Fax (216) 621-9020
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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IN THE MATTER OF:) DOCKET NO. TSCA-05-2009-0004
)
KATHRYN Y. LEWIS CAMPBELL)
SPRINGFIELD, OHIO)
)
)
RESPONDENT.) AMENDED ANSWER
)

NOW COMES the Respondent, Kathryn Lewis Campbell, by and through her undersigned counsel, **The Law Offices of Cassandra Collier-Williams, LLC**, and hereby responds to the United States Environmental Protection Agency's (hereinafter "U.S. EPA") Complaint in the following manner:

1. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 1 of Complainant's Complaint, and therefore must deny same.
2. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 2 of Complainant's Complaint, and therefore must deny same.
3. Respondent admits the allegations and averments set forth in Paragraph 3 of Complainant's Complaint.

4. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 4 of Complainant's Complaint, and therefore must deny same.
5. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 5 of Complainant's Complaint, and therefore must deny same.
6. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 6 of Complainant's Complaint, and therefore must deny same.
7. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 7 of Complainant's Complaint, and therefore must deny same.
8. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 8 of Complainant's Complaint, and therefore must deny same.
9. Respondent is without knowledge or information sufficient to form a

belief as to the truth of the allegations and averments set forth in Paragraph 9 of Complainant's Complaint, and therefore must deny same.

10. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 10 of Complainant's Complaint, and therefore must deny same.
11. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 11 of Complainant's Complaint, and therefore must deny same.
12. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 12 of Complainant's Complaint, and therefore must deny same.
13. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 13 of Complainant's Complaint, and therefore must deny same.
14. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in

Paragraph 14 of Complainant's Complaint, and therefore must deny same.

15. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 15 of Complainant's Complaint, and therefore must deny same.
16. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 16 of Complainant's Complaint, and therefore must deny same.
17. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 17 of Complainant's Complaint, and therefore must deny same.

GENERAL ALLEGATIONS

18. Respondent denies the allegations and averments set forth in Paragraph 18 of Complainant's Complaint.
19. Respondent denies the allegations and averments set forth in Paragraph 19 of Complainant's Complaint.
20. Respondent denies the allegations and averments set forth in Paragraph 20 of Complainant's Complaint.

21. Respondent denies the allegations and averments set forth in Paragraph 21 of Complainant's Complaint.
22. Respondent denies the allegations and averments set forth in Paragraph 22 of Complainant's Complaint.
23. Respondent denies the allegations and averments set forth in Paragraph 23 of Complainant's Complaint.

COUNT I

24. As to Paragraph 24 of Complainant's Complaint, Respondent incorporates the answers to the previous allegations and averments.
25. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 25 of Complainant's Complaint, and therefore must deny same.
26. Respondent denies the allegations and averments set forth in Paragraph 26 of Complainant's Complaint.
27. Respondent denies the allegations and averments set forth in Paragraph 27 of Complainant's Complaint.
28. Respondent denies the allegations and averments set forth in Paragraph 28 of Complainant's Complaint.

COUNT II

29. As to Paragraph 29 of Complainant's Complaint, Respondent

incorporates the answers to the previous allegations and averments.

30. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 30 of Complainant's Complaint, and therefore must deny same.
31. Respondent denies the allegations and averments set forth in Paragraph 31 of Complainant's Complaint.
32. Respondent denies the allegations and averments set forth in Paragraph 32 of Complainant's Complaint.
33. Respondent denies the allegations and averments set forth in Paragraph 33 of Complainant's Complaint.

COUNT III

34. As to Paragraph 34 of Complainant's Complaint, Respondent incorporates the answers to the previous allegations and averments.
35. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 35 of Complainant's Complaint, and therefore must deny same.
36. Respondent denies the allegations and averments set forth in Paragraph 36 of Complainant's Complaint.
37. Respondent denies the allegations and averments set forth in

Paragraph 37 of Complainant's Complaint.

COUNT IV

38. As to Paragraph 38 of Complainant's Complaint, Respondent incorporates the answers to the previous allegations and averments.
39. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 39 of Complainant's Complaint, and therefore must deny same.
40. Respondent denies the allegations and averments set forth in Paragraph 40 of Complainant's Complaint.
41. Respondent denies the allegations and averments set forth in Paragraph 41 of Complainant's Complaint.

COUNT V

42. As to Paragraph 42 of Complainant's Complaint, Respondent incorporates the answers to the previous allegations and averments.
43. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 43 of Complainant's Complaint, and therefore must deny same.
44. Respondent denies the allegations and averments set forth in Paragraph 44 of Complainant's Complaint.

45. Respondent denies the allegations and averments set forth in Paragraph 45 of Complainant's Complaint.

COUNT VI

46. As to Paragraph 46 of Complainant's Complaint, Respondent incorporates the answers to the previous allegations and averments.

47. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations and averments set forth in Paragraph 47 of Complainant's Complaint, and therefore must deny same.

48. Respondent denies the allegations and averments set forth in Paragraph 48 of Complainant's Complaint.

49. Respondent denies the allegations and averments set forth in Paragraph 49 of Complainant's Complaint.

PROPOSED CIVIL PENALTY

50. Respondent affirmatively states that Complainant's Complaint fails to state violations upon which relief may be granted, and must, therefore, be dismissed, and no penalties shall be assessed to Respondent.

PENALTY PAYMENT

51. Respondent affirmatively states that Complainant's Complaint fails to state violations upon which relief may be granted, and must,

therefore, be dismissed, and no penalties shall be assessed to Respondent.

52. Respondent affirmatively states that she is unable to pay the penalty amount proposed for the following reasons: she is currently working part-time; she has no saved resources; and she is raising her two grandchildren.

AFFIRMATIVE DEFENSES

53. Respondent affirmatively states that Complainant's Complaint fails to state a cause of action upon which relief may be granted, and must, therefore, be dismissed.
54. Respondent affirmatively states that Ohio Revised Code §5302.30 does not give rise to a cause of action against Respondent and the Complaint, therefore, must be dismissed.
55. Respondent affirmatively states that the Department of Housing and Urban Development Reform Act of 1989 (42 U.S.C. §3545) does not subject Respondent to civil money penalties.
56. Respondent affirmatively states that Complainant's damages, if any, were caused or contributed to by the conduct of a third party over whom the answering Respondent has no control.
57. Respondent alleges that because the Complaint herein is couched in conclusionary terms, this answering Respondent cannot fully

anticipate all affirmative defenses. Therefore, Respondent reserves the right to make and does not waive additional defenses, including those which may become apparent from further investigation and discovery.

WHEREFORE, Respondent prays the U.S. Environmental Protection Agency dismiss the Complainant's Complaint, with prejudice, at Complainant's costs.

Respectfully submitted,

THE LAW OFFICES OF CASSANDRA COLLIER-WILLIAMS, LLC



CASSANDRA COLLIER-WILLIAMS, ESQ., #0051951

ANTHONY T. PARKER, ESQ., #0068873

SARAH R. COFTA, ESQ., #0083653

P.O. Box 94062

Cleveland, Ohio 44101

(216) 621-9190

(216) 621-9020 (fax)

Counsel for Respondent
Kathryn Lewis Campbell

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REQUEST FOR HEARING

Respondent, by and through her undersigned attorney, hereby requests
a hearing.



CASSANDRA COLLIER-WILLIAMS, ESQ., #0051951
ANTHONY T. PARKER, ESQ., #0068873
SARAH R. COFTA, ESQ., #0083653

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Counsel for Respondent
Kathryn Lewis Campbell

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CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2009, a copy of the foregoing was delivered via regular U.S. mail to the following:

1. Regional Hearing Clerk (E-13J)
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

2. Richard R. Wagner (C-14J)
Senior Attorney, Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Counsel for Complainant

3. Judge William B. Moran
U.S. Environmental Protection Agency
Office of Administrative Law Judges
1200 Pennsylvania Ave., N.W.
Mail Code 1900L
Washington, DC 20005



CASSANDRA COLLIER-WILLIAMS, ESQ., #0051951

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