



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
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2010 DEC -7 PM 2:39

REPLY TO THE ATTENTION OF:

December 7, 2010

La Dawn Whitehead  
Regional Hearing Clerk  
Records Management Specialist  
U.S. EPA - Region 5 (E-19J)  
Office of Enforcement and Compliance Assurance  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

Re: In the Matter of Hanson's Window and Construction, Inc.  
Docket No. TSCA-05-2010-0013

Dear Ms. Whitehead:

Enclosed please find the original and one copy of Complainant's Amended Complaint in the above-captioned matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mary T. McAuliffe".

Mary T. McAuliffe  
Associate Regional Counsel

Enclosures

cc: Chief Judge Susan L. Biro  
Office of the Administrative Law Judges  
U.S. Environmental Protection Agency

D.S. Berenson, Esquire  
Kevin M. Tierney, Esquire

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

2010 DEC -7 PM 2:39

In the Matter of: )  
)  
Hanson's Window and Construction, Inc. )  
Madison Heights, Michigan )  
)  
Respondent, )  
\_\_\_\_\_ )

Docket No.  
Proceeding to Assess a Civil Penalty  
Under Section 16(a) of the Toxic Substances  
Control Act, 15 U.S.C. § 2615(a)

**Amended Complaint**

1. This is an amended administrative proceeding to assess a civil penalty under Section 16(a) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2615(a).
2. The Complainant is, by lawful delegation, the Director of the Land and Chemicals Division, United States Environmental Protection Agency (EPA), Region 5.
3. Respondent is Hanson's Window and Construction, Inc., d/b/a under numerous trade names, including but not limited to 800-Hansons and 1-800-Hansons, and numerous assumed names, including but not limited to Hanson's Window & Siding World, Hanson's Window & Siding, and Hanson's Window Company (Respondent), a corporation with a place of business located at 1000 Tech Row, Madison Heights, Michigan 48071.

**Statutory and Regulatory Background**

4. In promulgating the Residential Lead-Based Paint Hazard Reduction Act of 1992, at 42 U.S.C. § 4851 *et seq.*, Congress found, among other things, that low-level lead poisoning is widespread among American children, afflicting as many as 3,000,000 children under the age of 6; at low levels, lead poisoning in children causes intelligence deficiencies, reading and learning disabilities, impaired hearing, reduced attention span, hyperactivity, and behavior problems; and the ingestion of household dust containing lead from deteriorating or abraded lead-based paint is

the most common cause of lead poisoning in children. A key component of the national strategy to reduce and eliminate the threat of childhood lead poisoning is to educate the public concerning the hazards and sources of lead-based paint poisoning and steps to reduce and eliminate such hazards.

5. Section 1021 of the Residential Lead-Based Paint Hazard Reduction Act of 1992 amended TSCA, 15 U.S.C. § 2601 et. seq., by adding Title IV – Lead Exposure Reduction. Section 406(b) of TSCA, 15 U.S.C. § 2686(b), required the Administrator of EPA to promulgate regulations to require each person who performs for compensation a renovation of target housing to provide a lead hazard information pamphlet to the owner and occupant of such housing prior to commencing the renovation.

6. Section 407 of TSCA, 15 U.S.C. § 2687 required that the regulations promulgated by the Administrator include such recordkeeping and reporting requirements as may be necessary to insure the effective implementation of TSCA Subchapter IV (TSCA §§ 2681-2692).

7. On June 1, 1998, EPA promulgated regulations codified at 40 C.F.R. Part 745, Subpart E, Requirements for Hazard Education Before Renovation of Target Housing (Pre-Renovation Education Rule or PRE Rule) under 15 U.S.C. § 2686 and § 2687, which was subsequently amended and recodified on April 22, 2008 at 40 C.F.R. Part 745, Subpart E, Lead; Renovation, Repair, and Painting Program; Lead Hazard Information Pamphlet (RRP Rule).

8. The PRE Rule and the information distribution requirements of the RRP Rule, at 40 C.F.R. § 745.85, promulgated pursuant to 15 U.S.C. § 2686 and § 2687, which impose certain requirements prior to renovation of target housing. Each person who performs for compensation a renovation of target housing must provide a lead hazard information pamphlet to the owner and occupant of such housing or child occupied facility prior to commencing the renovation and must

comply with the PRE Rule by June 1, 1999, and with the amended information distribution requirements of the RRP Rule by April 22, 2008.

9. 40 C.F.R. § 745.223 defines *common area* to mean a portion of a building that is generally accessible to all occupants. Such an area may include, but is not limited to, hallways, stairways, laundry and recreational rooms, playgrounds, community centers, garages, and boundary fences.

10. 40 C.F.R. § 745.82(a)(1) makes 40 C.F.R. Subpart E applicable to all renovations of target housing performed for compensation, with 3 exceptions. The first exception is for *minor repair and maintenance activities* defined to mean activities, including minor electrical work and plumbing, that disrupt 2 square feet or less of painted surface per component.

11. Before December 22, 2008, 40 C.F.R. § 745.83 defines *pamphlet* to mean any pamphlet developed by EPA under section 406(a) of TSCA or any State or Tribal pamphlet approved by EPA pursuant to 40 C.F.R. § 745.326.

12. 40 C.F.R. § 745.83 defines *renovation* to mean the modification of any existing structure, or portion thereof, that results in the disturbance of painted surfaces, unless that activity is performed as part of an abatement as defined by this part (40 C.F.R. § 745.223). The term renovation includes (but is not limited to): the removal, modification or repair of painted surfaces or painted components (e.g., modification of painted doors, surface preparation activity (such as sanding, scraping, or other such activities that may generate paint dust)); the removal of large structures (e.g., walls, ceilings, large surface replastering, major re-plumbing); and window replacement.

13. 40 C.F.R. § 745.83 defines *renovator* to mean any person who performs for compensation a renovation.

14. 40 C.F.R. § 745.103 defines residential dwelling to mean a single family dwelling, including attached structures such as porches and stoops; or a single-family dwelling unit in a structure that contains more than one separate residential dwelling unit, and in which each such unit is used or occupied, or intended to be used or occupied, in whole or in part, as the residence of one or more persons.

15. 40 C.F.R. § 745.103 defines *target housing* to mean any housing constructed prior to 1978, except housing for the elderly or persons with disabilities (unless any child who is less than six (6) years of age resides or is expected to reside in such housing) or any zero-bedroom dwelling.

16. 40 C.F.R. § 745.85(a)(1) requires that the renovator performing renovation in dwelling units must provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation.

17. 40 C.F.R. § 745.86(a) requires that the renovator performing the renovation must retain and, if requested, make available to EPA all records necessary to demonstrate compliance with this subpart for a period of 3 years following completion of the renovation.

18. 40 C.F.R. § 745.86(b)(2) requires signed and dated acknowledgments of receipt be retained as required by 40 C.F.R. § 745.86(a) for a period of 3 years and as described in 40 C.F.R. § 745.85(a)(1)(i), (a)(2)(i), and (b)(1)(i).

19. 40 C.F.R. § 745.86(b)(3) requires certificates of attempted delivery be retained as required by 40 C.F.R. § 745.86(a) for a period of 3 years and as described in 40 C.F.R. § 745.85(a)(2)(i).

20. 40 C.F.R. § 745.86(b)(4) requires certificates of mailing be retained as required by 40 C.F.R. § 745.86(a) for a period of 3 years and as described in 40 C.F.R. § 745.85(a)(1)(ii), (a)(2)(ii), and (b)(1)(ii).

21. 40 C.F.R. § 745.86(b)(5) requires records of notification activities performed regarding common areas be retained as required by 40 C.F.R. § 745.86(a) for a period of 3 years and as described in 40 C.F.R. § 745.85(b)(3) and (b)(4).

22. Under 15 U.S.C. § 2689, failing to comply with Section 406(b) of TSCA violates Section 409 of TSCA, 15 U.S.C. § 2689, which may subject the violator to administrative civil penalties under Section 16(a) of TSCA, 15 U.S.C. § 2615(a) and 40 C.F.R. § 745.87(d).

23. Section 16(a) of TSCA, 42 U.S.C. § 2615, and 40 C.F.R. § 745.87(d), authorize the EPA Administrator to assess a civil penalty of up to \$25,000 for each violation of Section 409 of TSCA. Each day that such a violation continues constitutes a separate violation of Section 15 of TSCA, 15 U.S.C. § 2614. The Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701, and its implementing regulations at 40 C.F.R. Part 19, increased these statutory maximum penalties to \$27,500 per day of violation that occurred from January 31, 1997, through March 15, 2004, to \$32,500 per day of violation for violations that occurred from March 16, 2004 through January 12, 2009, and to \$37,500 for violations that occurred after January 12, 2009.

#### **General Allegations**

24. Complainant incorporates paragraphs 1 through 23 of this Complaint as if set forth in this paragraph.

25. On October 24, 2005, the Pesticides and Toxics Enforcement Section received information from the Michigan Department of Community Health (MDCH) concerning possible violations of the PRE Rule, 40 C.F.R. § 745.85, by Respondent in separate window replacement

renovations at 5614 Underwood and 19578 Hamburg, Detroit, Michigan.

26. In November of 2004, Respondent replaced windows at 19578 Hamburg, Detroit, Michigan.

27. In June of 2005, Respondent replaced windows at 5614 Underwood, Detroit, Michigan.

28. The MDCH visited the two homes referenced in paragraph 25, above, where Respondent had replaced windows, and was told by the home owners that Respondent had not provided them with a pamphlet before conducting window replacement work in their homes.

29. According to the MDCH both home owners had young children under 2 years old residing with them that tested positive for blood lead at 16 ug/dL, in February of 2005, and at 24.7 ug/dL, on July 5, 2005, following the window replacements conducted by Respondent.

30. On December 23, 2005, Complainant issued an administrative subpoena to Respondent, under authority of Section 11 of TSCA, 15 U.S.C. § 2610, seeking, among other things, copies of all contracts and/or agreements for renovation (contracts) and copies of all acknowledgement of receipt of a pamphlet by the owners and occupants of residential housing, copies of all certificates of attempted delivery of a pamphlet, and all certificates of mailing of a pamphlet since January 1, 2002.

31. On January 13, 2006, EPA agreed, by letter, to modify part of the December 23, 2005 subpoena, referenced in paragraph 30, above, to provide an extension of time and to limit the scope of documents at that time to allow Respondent to provide documents pertaining to renovation for calendar year 2005 within the State of Michigan.

32. On January 19, 2006 letter, EPA agreed, by letter, to a second modification to part of the December 23, 2005 subpoena, referenced in paragraph 30, above, so that at that time,

Respondent needed to provide only the names and addresses of persons who entered into agreements with Respondent pertaining to renovations of target housing for compensation performed in calendar year 2005 within the State of Michigan.

33. On February 8, 2006, Respondent's legal representative provided EPA with documents responsive to the TSCA administrative subpoena referenced in paragraph 30, modified as described in paragraph 32, including an Excel spreadsheet described as containing a complete listing of all jobs performed by Respondent in 2005 within the State of Michigan.

34. On January 12, 2010, Complainant issued a second administrative Subpoena to Respondent, under authority of Section 11 of TSCA, 15 U.S.C. § 2610, seeking, among other things, copies of all contracts and/or agreements for renovation (contracts) and copies of all acknowledgement of receipt of a pamphlet by the owners and occupants of residential housing, copies of all certificates of attempted delivery of a pamphlet, and all certificates of mailing of a pamphlet since January 12, 2005.

35. By letter dated March 19, 2010, EPA provided Respondent with an additional two week extension until April 2, 2010, for Respondent to submit its response.

36. To date, Respondent has not provided any documents in response to Complainant's January 2010 Subpoena.

37. Based on information provided by Respondent in response to Complainant's December 2005 Subpoena, on various dates from May through December 2005, Respondent, entered into the following 271 written work agreements (contracts) with individuals for window replacement in the following residential housing units: 215 Cloverland, Lansing, Michigan; 518 Clifford, Lansing, Michigan; 1038 Applegate Lane, East Lansing, Michigan; 1718 Cooper, Lansing, Michigan; 708 N. Foster, Lansing, Michigan; 915 Collingwood, East Lansing,



Michigan; 213 Harris, Lansing, Michigan; 1027 Climax, Lansing, Michigan; 5023 Kessler,  
Lansing, Michigan; 864 Tanglewood, East Lansing, Michigan; 2509 Fernwood, Lansing,  
Michigan; 1022 N. Foster, Lansing, Michigan; 717 Donson, Lansing, Michigan;  
3251 Stonewood, Lansing, Michigan; 1807 Herbert, Lansing, Michigan; 2107 Rolling Brook  
Lane, East Lansing, Michigan; 302 Memphis Street, Lansing, Michigan; 5655 Hallendale,  
Haslette, Michigan; 5913 Bayonne, Haslette, Michigan; 6375 Lake Drive, Haslette, Michigan;  
514 Brynford, Lansing, Michigan; 412 W. Willard, Lansing, Michigan; 6055 Rolfe Road,  
Lansing, Michigan; 612 Pearl, Charlotte, Michigan; 6020 Coulson, Lansing, Michigan;  
246 Clarendon, East Lansing, Michigan; 1341 Comfort, Lansing, Michigan; 824 Princeton,  
Lansing, Michigan; 2217 Bedford Road, Lansing, Michigan; 5463 Marsh Road, Haslette,  
Michigan; 6395 Shoeman Road, Haslette, Michigan; 520 Lathrop, Lansing, Michigan;  
3901 Stratford, Lansing, Michigan; 3970 Aurelius, Onondaga, Michigan; 2805 Moyer,  
Williamston, Michigan; 726 N. Fairview, Lansing, Michigan; 1547 Berkley, Holt, Michigan;  
3957 Dell, Holt, Michigan; 3806 Walton, Lansing, Michigan; 5790 Buena Parkway, Haslette,  
Michigan; 2198 Coolridge Street, Holt, Michigan; 724 Cherry, Charlotte, Michigan; 604 S.  
Sheldon, Charlotte, Michigan; 6425 Holt Road, Holt, Michigan; 712 Cherry, Charlotte,  
Michigan; 606 Brynford, Lansing, Michigan; 831 Reo, Lansing, Michigan; 4251 Williamston,  
Stockbridge, Michigan; 1407 Gordon, Lansing, Michigan; 901 E. Lenore, Lansing, Michigan;  
3102 Creston, Lansing, Michigan; 542 Avon, Lansing, Michigan; 3027 Fielding Drive, Lansing,  
Michigan; 836 R G Curtis Avenue, Lansing, Michigan; 1218 Old Hickory, East Lansing,  
Michigan; 4501 Devonshire, Lansing, Michigan; 1605 Linval, Lansing, Michigan; 207 Astor,  
Lansing, Michigan; 1127 Camp, Lansing, Michigan; 947 West Ash, Mason, Michigan;  
1724 Shady Oak Lane, Lansing, Michigan; 411 Beaver, Lansing, Michigan; 437 Pearl, Lansing,

Michigan; 3727 Homewood, Lansing, Michigan; 2515 Concord, Lansing, Michigan;  
1112 N. Foster, Lansing, Michigan; 1623 Melrose, East Lansing, Michigan;  
4921 S. Pennsylvania, Lansing, Michigan; 218 Foster, Lansing, Michigan; 319 Jones, Lansing,  
Michigan; 1307 Chartwell Carriage Way, East Lansing, Michigan; 1321 Jolly, Lansing,  
Michigan; 1407 Linvall, Lansing, Michigan; 1917 Holly Way, Lansing, Michigan; 416 Rosadell,  
Lansing, Michigan; 334 Dunlap, Lansing, Michigan; 427 Rosadell, Lansing, Michigan;  
1700 Donora, Lansing, Michigan; 1744 Briarwood, Lansing, Michigan; 2111 Colvin, Lansing,  
Michigan; 1600 Lindbergh, Lansing, Michigan; 731 Downer Avenue, Lansing, Michigan;  
600 Hodge, Lansing, Michigan; 722 W. Saginaw, Lansing, Michigan; 3417 Penrose Drive,  
Lansing, Michigan; 321 Foote Street, Charlotte, Michigan; 318 W. Shaw, Charlotte, Michigan;  
4914 Starr, Lansing, Michigan; 4527 Ingham, Lansing, Michigan; 3200 Avalon, Lansing,  
Michigan; 711 Donson Drive, Lansing, Michigan; 421 Franklin, Leslie, Michigan; 5518 Manor,  
Lansing, Michigan; 1330 Marquette, Michigan; 901 N. Cochran, Charlotte, Michigan;  
609 Merritt, Charlotte, Michigan; 323 Sheldon, Charlotte, Michigan; 413 Seminary, Charlotte,  
Michigan; 1210 S. Clinton, Charlotte, Michigan; 318 W. Shaw, Charlotte, Michigan;  
901 N. Cochran, Charlotte, Michigan; 609 Merritt, Charlotte, Michigan; 323 Sheldon, Charlotte,  
Michigan; 423 S. Pearl, Charlotte, Michigan; 23465 Audrey, Warren, Michigan; 5731 Arden  
Avenue, Warren, Michigan; 20757 Blackmar, Warren, Michigan; 26035 Cunningham Drive,  
Warren, Michigan; 27401 Winslow, Warren, Michigan; 25040 St. Clement Drive, Warren,  
Michigan; 13747 Adams, Warren, Michigan; 13610 La Chene, Warren, Michigan;  
13040 Rosselo, Warren, Michigan; 28730 Norwood, Warren, Michigan; 32536 Holden Drive,  
Warren, Michigan; 25571 Curie, Warren, Michigan; 11859 Seneca, Warren, Michigan;  
20799 Audrey, Warren, Michigan; 28781 Newport, Warren, Michigan; 2234 13 Mile, Warren,

Michigan; 8670 Ford, Warren, Michigan; 11204 Nancy, Warren, Michigan; 27858 Wagner,  
Warren, Michigan; 13650 Martin Road, Warren, Michigan; 5112 Busch, Warren, Michigan;  
8404 Westminster, Warren, Michigan; 7280 Ready, Warren, Michigan; 29252 Hoover, Warren,  
Michigan; 2805 Common Road, Warren, Michigan; 28070 Universal Drive, Warren, Michigan;  
29273 Hayes, Warren, Michigan; 15175 Granada Plaza, Warren, Michigan; 27251 Gail Drive,  
Warren, Michigan; 21356 Sunset, Warren, Michigan; 30531 Flanders, Warren, Michigan;  
28658 James, Warren, Michigan; 13789 Iowa, Warren, Michigan; 22119 Hill, Warren,  
Michigan; 31558 Acton, Warren, Michigan; 5637 Streefkerk, Warren, Michigan;  
29226 Nottingham, Warren, Michigan; 27574 Los Olas Drive, Warren, Michigan;  
21445 Blackmar, Warren, Michigan; 7035 Ford, Warren, Michigan; 32827 Eiffel Court, Warren,  
Michigan; 32582 Knollwood Drive, Warren, Michigan; 24460 Beierman, Warren, Michigan;  
29280 Ridgefield, Warren, Michigan; 25730 Cunningham, Warren, Michigan; 4709 Bates Court,  
Warren, Michigan; 28302 Mavis Road, Warren, Michigan; 31403 Anita Drive, Warren,  
Michigan; 32654 Barclay Square, Warren, Michigan; 31127 Lyons Circle E, Warren, Michigan;  
21556 Blackmar, Warren, Michigan; 23348 Wagner, Warren, Michigan; 29900 N. Grand Oaks,  
Warren, Michigan; 27275 Dowland, Warren, Michigan; 14829 Alvin, Warren, Michigan;  
31255 Fairfield, Warren, Michigan; 4456 Stratford Drive, Warren, Michigan; 21769 Ira, Warren,  
Michigan; 3986 Los Angles, Warren, Michigan; 8232 Fisher, Warren, Michigan;  
29244 Ridgefield, Warren, Michigan; 4573 E. 13 Mile, Warren, Michigan; 3808 Dawn, Warren,  
Michigan; 4206 Linville, Warren, Michigan; 14462 Toepfer, Warren, Michigan; 25244 Eureka,  
Warren, Michigan; 11205 Essex, Warren, Michigan; 26734 Grobbel Avenue, Warren, Michigan;  
24611 Berry, Warren, Michigan; 4738 Shell Court, Warren, Michigan; 11170 Chicago Road,  
Warren, Michigan; 13622 Melva Drive, Warren, Michigan; 29544 Runey Drive, Warren,

Michigan; 8709 Kennedy Circle, Warren, Michigan; 30927 St. Onge, Warren, Michigan; 3398 Berkshire, Warren, Michigan; 14031 Martin Road, Warren, Michigan; 21444 Cyman, Warren, Michigan; 32614 Stricker, Warren, Michigan; 27683 Shackett, Warren, Michigan; 7068 Paige, Warren, Michigan; 3560 Barry, Wayne, Michigan; 31340 Artesian, Warren, Michigan; 30219 Lund, Warren, Michigan; 24159 Curie, Warren, Michigan; 26721 Warner, Warren, Michigan; 2234 13 Mile, Warren, Michigan; 27256 Bunert, Warren, Michigan; 8452 Essex, Warren, Michigan; 29424 Palomino, Warren, Michigan; 11288 Ocala, Warren, Michigan; 28816 Steele, Warren, Michigan; 24651 Melody, Warren, Michigan; 8263 Kennedy Circle, Unit 4, Warren, Michigan; 32617 Dover Avenue, Warren, Michigan; 11308 Lozier, Warren, Michigan; 4611 Buckingham, Warren, Michigan; 32575 Karns, Warren, Michigan; 32851 Rosenbusch, Warren, Michigan; 25305 St. Clement Drive, Warren, Michigan; 27224 Newport, Warren, Michigan; 4300 Marr Avenue, Warren, Michigan; 8047 Chalmers, Warren, Michigan; 32136 Mark Adam Lange, Warren, Michigan; 32226 Saint Annes Drive, Warren, Michigan; 12843 Sarsfield, Warren, Michigan; 11464 Engleman, Warren, Michigan; 8311 Gerald, Warren, Michigan; 14639 Hoerning Avenue, Warren, Michigan; 4733 Bates Drive, Warren, Michigan; 21195 Blackmar, Warren, Michigan; 28112 Cunningham, Warren, Michigan; 7271 Marian, Warren, Michigan; 28659 James, Warren, Michigan; 21747 Dexter Court, Warren, Michigan; 30715 Lorraine, Warren, Michigan; 7544 Yacht Avenue, Warren, Michigan; 28218 Aline, Warren, Michigan; 32217 Hawthorne Drive, Warren, Michigan; 24312 Curie, Warren, Michigan; 11109 Lillian Avenue, Warren, Michigan; 11812 Lutz Avenue, Warren, Michigan; 12062 Racine, Warren, Michigan; 14320 Stephens, Warren, Michigan; 3104 Bart, Warren, Michigan; 31105 Morgan, Warren, Michigan; 31545 Palomino, Warren, Michigan; 11439 Irene, Warren, Michigan; 32057 Red Run Drive, Warren, Michigan; 32617 Rosenbusch,

Warren, Michigan; 24438 Audrey, Warren, Michigan; 29845 Pinto Drive, Warren, Michigan; 20784 Curie, Warren, Michigan; 2611 Emmons, Warren, Michigan; 7236 Cadillac, Warren, Michigan; 32510 Beechwood, Warren, Michigan; 25202 Firwood, Warren, Michigan; 13816 Murthum, Warren, Michigan; 27630 Sylvan, Warren, Michigan; 3039 Pearl, Warren, Michigan; 26456 Wexford, Warren, Michigan; 21053 Eastwood, Warren, Michigan; 20995 Eastwood, Warren, Michigan; 3916 Rolf, Warren, Michigan; 23841 Romano, Warren, Michigan; 14388 Hendricks, Warren, Michigan; 31445 Gloede, Warren, Michigan; 25688 Timberline Drive, Warren, Michigan; 20935 Waltham, Warren, Michigan; 8420 Republic Avenue, Warren, Michigan; 13846 Hovey, Warren, Michigan; 31409 Reid, Warren, Michigan; 24336 Blackmar, Warren, Michigan; 25109 Patricia, Warren, Michigan; 21078 Helle, Warren, Michigan; 4931 Bates Court, Warren, Michigan; 11153 Lillian, Warren, Michigan; 26636 Fairfield, Warren, Michigan; 13331 Prospect, Warren, Michigan; 28888 Palm Beach Drive, Warren, Michigan; 22428 Bruce, Warren, Michigan; 29900 Grand Oaks Drive, Warren, Michigan; 4121 Hillcrest, Warren, Michigan; 25767 Patricia, Warren, Michigan; 30956 Marrocco Drive, Warren, Michigan; 5082 Lyons Circle South, Warren, Michigan; and 5614 Underwood, Detroit, Michigan.

38. Each of the residential housing units identified in paragraph 37, above, are target housing as defined in 40 C.F.R. § 745.103.

39. On April 7, 2006, EPA obtained a Dun and Bradstreet report indicating that Respondent had sales of over \$29 million and a net worth of over \$3.4 million.

40. On October 4, 2006, Respondent's legal representative provided EPA with tax returns and financial information regarding Respondent's ability to pay a penalty.

41. On June 3, 2010, EPA obtained a Dun and Bradstreet report indicating that Respondent had sales of over \$27 million and a net worth of over \$1.4 million.

42. On June 4, 2010, EPA advised Respondent by letter that EPA was planning to file a civil administrative complaint against Respondent for specific alleged violations of the PRE Rule and that the complaint would seek a civil penalty. EPA asked Respondent to identify any factors Respondent thought EPA should consider before issuing the complaint. If Respondent believed there were financial factors which bore on Respondent's ability to pay a civil penalty, EPA asked Respondent to submit specific financial documents.

43. On June 7, 2010, Respondent received the pre-filing notice letter referred to in paragraph 42, above.

44. Respondent did not reply to EPA's June 4, 2010 letter.

45. Respondent has an ability to pay the proposed penalty of \$784,380.

**Counts 1 through 271**

46. Complainant incorporates paragraphs 1 through 45 of this Complaint as if set forth in this paragraph.

47. 40 C.F.R. § 745. 85(a)(1) requires that the firm performing renovation in dwelling units must provide the owner the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation.

48. Count 1: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 215 Cloverland, Lansing, Michigan.

49. Count 2: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 518 Clifford, Lansing, Michigan.

50. Count 3: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1038 Applegate Lane, East Lansing, Michigan.

51. Count 4: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1718 Cooper, Lansing, Michigan.

52. Count 5: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 708 N. Foster, Lansing, Michigan.

53. Count 6: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 915 Collingwood, East Lansing, Michigan.

54. Count 7: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the

renovation before conducting the renovation at 213 Harris, Lansing, Michigan.

55. Count 8: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1027 Climax, Lansing, Michigan.

56. Count 9: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 5023 Kessler, Lansing, Michigan.

57. Count 10: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 864 Tanglewood, East Lansing, Michigan.

58. Count 11: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 2509 Fernwood, Lansing, Michigan.

59. Count 12: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1022 N. Foster, Lansing, Michigan.

60. Count 13: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the



owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 717 Donson, Lansing, Michigan.

61. Count 14: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 3251 Stonewood, Lansing, Michigan.

62. Count 15: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1807 Herbert, Lansing, Michigan.

63. Count 16: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 2107 Rolling Brook Lane, East Lansing, Michigan.

64. Count 17: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 302 Memphis Street, Lansing, Michigan.

65. Count 18: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 5655 Hallendale, Haslette, Michigan.

66. Count 19: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 5913 Bayonne, Haslette, Michigan,

67. Count 20: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 6375 Lake Drive, Haslette, Michigan.

68. Count 21: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 514 Brynford, Lansing, Michigan.

69. Count 22: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 412 W. Willard, Lansing, Michigan.

70. Count 23: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 6055 Rolfe Road, Lansing, Michigan.

71. Count 24: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the

renovation before conducting the renovation at 612 Pearl, Charlotte, Michigan.

72. Count 25: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 6020 Coulson, Lansing, Michigan.

73. Count 26: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 246 Clarendon, East Lansing, Michigan.

74. Count 27: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1341 Comfort, Lansing, Michigan.

75. Count 28: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 824 Princeton, Lansing, Michigan.

76. Count 29: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 2217 Bedford Road, Lansing, Michigan.

77. Count 30: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the

owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 5463 Marsh Road, Haslette, Michigan.

78. Count 31: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 6395 Shoeman Road, Haslette, Michigan.

79. Count 32: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 520 Lathrop, Lansing, Michigan.

80. Count 33: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 3901 Stratford, Lansing, Michigan.

81. Count 34: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 3970 Aurelius, Onondaga, Michigan.

82. Count 35: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 2805 Moyer, Williamston, Michigan.

83. Count 36: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 726 N. Fairview, Lansing, Michigan.

84. Count 37: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1547 Berkley, Holt, Michigan.

85. Count 38: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 3957 Dell, Holt, Michigan.

86. Count 39: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 3806 Walton, Lansing, Michigan.

87. Count 40: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 5790 Buena Parkway, Haslette, Michigan.

88. Count 41: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the

renovation before conducting the renovation at 2198 Coolridge Street, Holt, Michigan.

89. Count 42: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 724 Cherry, Charlotte, Michigan.

90. Count 43: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 604 S. Sheldon, Charlotte, Michigan.

91. Count 44: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 6425 Holt Road, Holt, Michigan.

92. Count 45: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 712 Cherry, Charlotte, Michigan.

93. Count 46: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 606 Brynford, Lansing, Michigan.

94. Count 47: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the

owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 831 Reo, Lansing, Michigan.

95. Count 48: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 4251 Williamston, Stockbridge, Michigan.

96. Count 49: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1407 Gordon, Lansing, Michigan.

97. Count 50: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 901 E. Lenore, Lansing, Michigan.

98. Count 51: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 3102 Creston, Lansing, Michigan.

99. Count 52: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 542 Avon, Lansing, Michigan.

100. Count 53: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 3027 Fielding Drive, Lansing, Michigan.

101. Count 54: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 836 R G Curtis Avenue, Lansing, Michigan.

102. Count 55: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1218 Old Hickory, East Lansing, Michigan.

103. Count 56: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 4501 Devonshire, Lansing, Michigan.

104. Count 57: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1605 Linval, Lansing, Michigan.

105. Count 58: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the



renovation before conducting the renovation at 207 Astor, Lansing, Michigan.

106. Count 59: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1127 Camp, Lansing, Michigan.

107. Count 60: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 947 West Ash, Mason, Michigan.

108. Count 61: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1724 Shady Oak Lane, Lansing, Michigan.

109. Count 62: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 411 Beaver, Lansing, Michigan.

110. Count 63: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 437 Pearl, Lansing, Michigan.

111. Count 64: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the

owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 3727 Homewood, Lansing, Michigan.

112. Count 65: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 2515 Concord, Lansing, Michigan.

113. Count 66: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1112 N. Foster, Lansing, Michigan.

114. Count 67: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1623 Melrose, East Lansing, Michigan.

115. Count 68: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 4921 S, Pennsylvania, Lansing, Michigan.

116. Count 69: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 218 Foster, Lansing, Michigan.

117. Count 70: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 319 Jones, Lansing, Michigan.

118. Count 71: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1307 Chartwell Carriage Way, East Lansing, Michigan.

119. Count 72: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1321 Jolly, Lansing, Michigan.

120. Count 73: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1407 Linnvall, Lansing, Michigan.

121. Count 74: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1917 Holly Way, Lansing, Michigan.

122. Count 75: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the

owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 416 Rosadell, Lansing, Michigan.

123. Count 76: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 334 Dunlap, Lansing, Michigan.

124. Count 77: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 427 Rosadell, Lansing, Michigan.

125. Count 78: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1700 Donora, Lansing, Michigan.

126. Count 79: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1744 Briarwood, Lansing, Michigan.

127. Count 80: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 2111 Colvin, Lansing, Michigan.

128. Count 81: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1600 Lindbergh, Lansing, Michigan.

129. Count 82: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 731 Downer Avenue, Lansing, Michigan.

130. Count 83: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 600 Hodge, Lansing, Michigan.

131. Count 84: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 722 W. Saginaw, Lansing, Michigan.

132. Count 85: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 3417 Penrose Drive, Lansing, Michigan.

133. Count 86: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the

renovation before conducting the renovation at 321 Foote Street, Charlotte, Michigan.

134. Count 87: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 318 W. Shaw, Charlotte, Michigan.

135. Count 88: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 4914 Starr, Lansing, Michigan.

136. Count 89: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 4527 Ingham, Lansing, Michigan.

137. Count 90: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 3200 Avalon, Lansing, Michigan.

138. Count 91: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 711 Donson Drive, Lansing, Michigan.

139. Count 92: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the

owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 421 Franklin, Leslie, Michigan.

140. Count 93: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 5518 Manor, Lansing, Michigan.

141. Count 94: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1330 Marquette, Michigan.

142. Count 95: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 901 N. Cochran, Charlotte, Michigan.

143. Count 96: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 609 Merritt, Charlotte, Michigan.

144. Count 97: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 323 Sheldon, Charlotte, Michigan.

145. Count 98: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 413 Seminary, Charlotte, Michigan.

146. Count 99: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 1210 S. Clinton, Charlotte, Michigan.

147. Count 100: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 318 W. Shaw, Charlotte, Michigan.

148. Count 101: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 901 N. Cochran, Charlotte, Michigan.

149. Count 102: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 609 Merritt, Charlotte, Michigan.

150. Count 103: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the



renovation before conducting the renovation at 323 Sheldon, Charlotte, Michigan.

151. Count 104: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 423 S. Pearl, Charlotte, Michigan.

152. Count 105: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 23465 Audrey, Warren, Michigan.

153. Count 106: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 5731 Arden Avenue, Warren, Michigan.

154. Count 107: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 20757 Blackmar, Warren, Michigan.

155. Count 108: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 26035 Cunningham Drive, Warren, Michigan.

156. Count 109: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that

the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 27401 Winslow, Warren, Michigan.

157. Count 110: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 25040 St. Clement Drive, Warren, Michigan.

158. Count 111: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 24159 Curie, Warren, Michigan.

159. Count 112: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 13747 Adams, Warren, Michigan.

160. Count 113: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 13610 La Chene, Warren, Michigan.

161. Count 114: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 13040 Rosselo, Warren, Michigan.

162. Count 115: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 28730 Norwood, Warren, Michigan.

163. Count 116: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 32536 Holden Drive, Warren, Michigan.

164. Count 117: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 25571 Curie, Warren, Michigan.

165. Count 118: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 11859 Seneca, Warren, Michigan.

166. Count 119: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 20799 Audrey, Warren, Michigan.

167. Count 120: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the

renovation before conducting the renovation at 28781 Newport, Warren, Michigan.

168. Count 121: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 2234 13 Mile, Warren, Michigan.

169. Count 122: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 8670 Ford, Warren, Michigan.

170. Count 123: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 11204 Nancy, Warren, Michigan.

171. Count 124: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 27858 Wagner, Warren, Michigan.

172. Count 125: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 13650 Martin Road, Warren, Michigan.

173. Count 126: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that

the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 5112 Busch, Warren, Michigan.

174. Count 127: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 8404 Westminster, Warren, Michigan.

175. Count 128: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 7280 Ready, Warren, Michigan.

176. Count 129: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 29252 Hoover, Warren, Michigan.

177. Count 130: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 2805 Common Road, Warren, Michigan.

178. Count 131: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 28070 Universal Drive, Warren, Michigan.

179. Count 132: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 29273 Hayes, Warren, Michigan.

180. Count 133: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 15175 Granada Plaza, Warren, Michigan.

181. Count 134: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 27251 Gail Drive, Warren, Michigan.

182. Count 135: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 21356 Sunset, Warren, Michigan.

183. Count 136: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 30531 Flanders, Warren, Michigan.

184. Count 137: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the

renovation before conducting the renovation at 28658 James, Warren, Michigan.

185. Count 138: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 13789 Iowa, Warren, Michigan.

186. Count 139: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 22119 Hill, Warren, Michigan.

187. Count 140: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 31558 Acton, Warren, Michigan.

188. Count 141: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 5637 Streefkerk, Warren, Michigan.

189. Count 142: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 29226 Nottingham, Warren, Michigan.

190. Count 143: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that

the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 27574 Los Olas Drive, Warren, Michigan.

191. Count 144: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 21445 Blackmar, Warren, Michigan.

192. Count 145: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 7035 Ford, Warren, Michigan.

193. Count 146: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 32827 Eiffel Court, Warren, Michigan.

194. Count 147: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 32582 Knollwood Drive, Warren, Michigan.

195. Count 148: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 24460 Beierman, Warren, Michigan.



196. Count 149: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 29280 Ridgefield, Warren, Michigan.

197. Count 150: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 25730 Cunningham, Warren, Michigan.

198. Count 151: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 4709 Bates Court, Warren, Michigan.

199. Count 152: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 28302 Mavis Road, Warren, Michigan.

200. Count 153: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 31403 Anita Drive, Warren, Michigan.

201. Count 154: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the

renovation before conducting the renovation at 32654 Barclay Square, Warren, Michigan.

202. Count 155: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 31127 Lyons Circle E, Warren, Michigan.

203. Count 156: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 21556 Blackmar, Warren, Michigan.

204. Count 157: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 23348 Wagner, Warren, Michigan.

205. Count 158: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 29900 N. Grand Oaks, Warren, Michigan.

206. Count 159: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 27275 Dowland, Warren, Michigan.

207. Count 160: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that

the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 14829 Alvin, Warren, Michigan.

208. Count 161: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 31255 Fairfield, Warren, Michigan.

209. Count 162: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 4456 Stratford Drive, Warren, Michigan.

210. Count 163: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 21769 Ira, Warren, Michigan.

211. Count 164: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 3986 Los Angles, Warren, Michigan.

212. Count 165: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 8232 Fisher, Warren, Michigan.

213. Count 166: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 29244 Ridgefield, Warren, Michigan.

214. Count 167: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 4573 E. 13 Mile, Warren, Michigan.

215. Count 168: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 3808 Dawn, Warren, Michigan.

216. Count 169: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 4206 Linville, Warren, Michigan.

217. Count 170: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 14462 Toepfer, Warren, Michigan.

218. Count 171: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the

renovation before conducting the renovation at 25244 Eureka, Warren, Michigan.

219. Count 172: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 11205 Essex, Warren, Michigan.

220. Count 173: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 26734 Grobbel Avenue, Warren, Michigan.

221. Count 174: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 24611 Berry, Warren, Michigan.

222. Count 175: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 4738 Shell Court, Warren, Michigan.

223. Count 176: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 11170 Chicago Road, Warren, Michigan.

224. Count 177: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that

the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 13622 Melva Drive, Warren, Michigan.

225. Count 178: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 29544 Runey Drive, Warren, Michigan.

226. Count 179: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 8709 Kennedy Circle, Warren, Michigan.

227. Count 180: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 30927 St. Onge, Warren, Michigan.

228. Count 181: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 3398 Berkshire, Warren, Michigan.

229. Count 182: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 14031 Martin Road, Warren, Michigan.

230. Count 183: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 21444 Cyman, Warren, Michigan.

231. Count 184: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 32614 Stricker, Warren, Michigan.

232. Count 185: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 27683 Shackett, Warren, Michigan.

233. Count 186: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 7068 Paige, Warren, Michigan.

234. Count 187: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 3560 Barry, Wayne, Michigan.

235. Count 188: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the

renovation before conducting the renovation at 31340 Artesian, Warren, Michigan.

236. Count 189: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 30219 Lund, Warren, Michigan.

237. Count 190: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 26721 Warner, Warren, Michigan.

238. Count 191: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 2234 13 Mile, Warren, Michigan.

239. Count 192: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 27256 Bunert, Warren, Michigan.

240. Count 193: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 8452 Essex, Warren, Michigan.

241. Count 194: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that



the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 29424 Palomino, Warren, Michigan.

242. Count 195: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 11288 Ocalla, Warren, Michigan.

243. Count 196: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 28816 Steele, Warren, Michigan.

244. Count 197: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 24651 Melody, Warren, Michigan.

245. Count 198: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 8263 Kennedy Circle, Unit 4, Warren, Michigan.

246. Count 199: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 32617 Dover Avenue, Warren, Michigan.

247. Count 200: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 11308 Lozier, Warren, Michigan.

248. Count 201: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 4611 Buckingham, Warren, Michigan.

249. Count 202: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 32575 Karns, Warren, Michigan.

250. Count 203: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 32851 Rosenbusch, Warren, Michigan.

251. Count 204: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 25305 St. Clement Drive, Warren, Michigan.

252. Count 205: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the

renovation before conducting the renovation at 27224 Newport, Warren, Michigan.

253. Count 206: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 4300 Marr Avenue, Warren, Michigan.

254. Count 207: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 8047 Chalmers, Warren, Michigan.

255. Count 208: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 32136 Mark Adam Lange, Warren, Michigan.

256. Count 209: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 32226 Saint Annes Drive, Warren, Michigan.

257. Count 210: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that the owner has received the pamphlet or obtain a certificate of mailing at least 7 days prior to the renovation before conducting the renovation at 12843 Sarsfield, Warren, Michigan.

258. Count 211: Respondent failed to provide the owner of the residential dwelling unit of target housing with the pamphlet and obtain from the owner, a written acknowledgement that