



REGION 9

SAN FRANCISCO, CA 94105

VIA EMAIL: tverhaalen@smc-lv.com

Taylor Verhaalen
President
Rooster Philben Inc.
10151 Park Run Drive
Las Vegas, NV 89145

Re: Consent Agreement and Final Order In the Matter of Rooster Philben, Inc. doing business as Stout Management Company; Docket No. TSCA-09-2025-0105

Dear Taylor Verhaalen:

Enclosed please find a Consent Agreement and Final Order (CAFO) concerning alleged violations of Section 1018 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, 42 U.S.C. § 4852d, and their implementing regulations at 40 C.F.R. Part 745, Subpart F by Rooster Philben Inc. dba Stout Management Company. The terms of the CAFO require that the payment of \$47,625 be received by EPA within 30 calendar days of the effective date (stamped filing date) of this CAFO. Your completion of all actions laid out in the CAFO will close this case.

If you have any questions, please contact Rieko Nishimura of my staff at 415-972-3336, Nishimura.Rieko@epa.gov, or have your attorney contact Ivan Lieben, EPA counsel, at 415-972-3914, Lieben.Ivan@epa.gov.

Sincerely,

Matt Salazar, P.E.
Manager, Toxics Section
Enforcement and Compliance Assurance Division