

From: [Rivera, Jose](#)
To: [Region2 RegionalHearingClerk](#)
Cc: [Maples, Karen](#); [Melendez-Colon, Suzette](#); [Maclay, Yolianne](#); [xbonilla.amgroup@gmail.com](#); [desarrolladora.yahir.inc@gmail.com](#)
Subject: In the Matter of Desarrolladora Yahir, Inc. and A & M Group, Inc. - Filing of Administrative Complaint (Docket Number CWA-02-2025-3451)
Date: Tuesday, September 30, 2025 4:49:01 PM
Attachments: [DYI Complaint Transmittal Letter - Tres Palmas Sunset View \(9-30-25\).pdf](#)
[A&M Group Complaint Transmittal Letter - Tres Palmas Sunset View \(9-30-25\).pdf](#)
[Complaint - Tres Palmas Sunset View \(9-30-25\).pdf](#)
[CROP - 40 CFR Part 22.pdf](#)
[Standing Order.pdf](#)
[Certificate of Service to DYI - Complaint \(9-30-2025\).pdf](#)
[Certificate of Service to A&M Group - Complaint \(9-30-2025\).pdf](#)

To the Regional Hearing Clerk, Mrs. Karen Maples:

The Director of the Caribbean Environmental Protection Division, Environmental Protection Agency, Region 2, is hereby submitting the electronic filing of the Administrative Complaint, Docket Number CWA-02-2025-3451, issued today September 30, 2025, to Desarrolladora Yahir, Inc. and A & M Group, Inc.

Documents Attached:

-

1. Transmittal letters
2. Administrative Complaint
3. Copy of *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits*, 40 C.F.R. Part 22
4. Region 2 Standing Order (August 3, 2020)
5. Certificate of Service for Desarrolladora Yahir, Inc.
6. Certificate of Service for A & M Group, Inc.

Notes: Tracking on the delivery of Complaint to Respondents through US Postal Service (USPS):

- a. Tracking Number for A & M Group, Inc. ---> **7019 1640 0000 0988 4669**
- b. Tracking Number for Desarrolladora Yahir, Inc. ---> **7019 1640 0000 0988 4348**

If you have any questions regarding this filing, please contact Ms. Suzette Meléndez-Colón from the ORC, Caribbean Team at melendez-colon.suzette@epa.gov, (787) 977-5822, or myself.

José A. Rivera, BSCE | Team Leader

Clean Water Act Team

Multimedia Permits and Compliance Branch

US EPA Region 2 | Caribbean Environmental Protection Division

Direct Dial: (787) 977-5842

Main: (787) 977-5865

e-mail: rivera.jose@epa.gov