

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

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In the matter of:

Michael Cannon
4519 North 74th Street
Milwaukee, WI 53215,

Docket No. TSCA-05-2008-001522

Respondent

RESPONDENT'S ANSWER AND AFFIRMATIVE DEFENSES TO THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION 5, COMPLAINT

The respondent, Michael Cannon, appearing pro se admits, denies, and affirmatively answers the above entitled complaint.

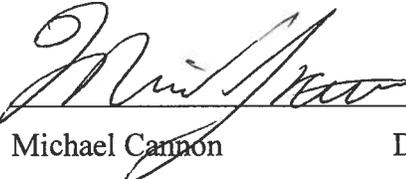
1. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
2. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
3. Respondent admits he is Michael Cannon, but denies he resides at 4542 N. 84th Street, Milwaukee, WI, respondent admits his current address is 4519 N. 74th Street, Milwaukee, WI 53215
4. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
5. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
6. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
7. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
8. Respondent is without knowledge or information sufficient to form a belief regarding

- the allegation
9. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
 10. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
 11. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
 12. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
 13. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
 14. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
 15. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
 16. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
 17. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
 18. Respondent admit
 19. Respondent admit
 20. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
 21. Respondent admits
 22. Respondent admits
 23. Respondent admits
 24. Respondent denies this allegation, the rental agreement was written
 25. Respondent denies, the term of the contract was month to month
 26. Respondent admit that Latoya Holman occupied the apartment with her two children but is without knowledge or information sufficient to form a belief regarding the date of birth of her children

27. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
28. Respondent admits
29. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
30. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
31. Respondent denies he received such a letter
32. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
33. Respondent incorporates paragraph 1 to 32 of his answers as if set forth in this paragraph
34. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
35. Respondent denies this allegation
36. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
37. Respondent incorporates paragraph 1 to 32 of this answer as if set forth in this paragraph
38. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
39. Respondent denies this allegation
40. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
41. Respondent incorporates paragraph 1 to 32 of this answer as if set forth in this paragraph
42. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
43. Respondent denies this allegation
44. Respondent is without knowledge or information sufficient to form a belief regarding the allegation

45. Respondent incorporates paragraph 1 to 32 of this answer as if set forth in this paragraph
46. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
47. Respondent denies this allegation
48. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
49. Respondent incorporates paragraph 1 to 32 of this answer as if set forth in this paragraph
50. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
51. Respondent denies this allegation
52. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
53. Respondent incorporates paragraph 1 to 32 of this answer as if set forth in this paragraph
54. Respondent is without knowledge or information sufficient to form a belief regarding the allegation
55. Respondent denies this allegation
56. Is without knowledge or information sufficient to form a belief regarding the allegation
57. Is without knowledge or information sufficient to form a belief regarding the allegation
58. Is without knowledge or information sufficient to form a belief regarding the allegation
59. Is without knowledge or information sufficient to form a belief regarding the allegation
60. Respondent denies receiving such letter stated in paragraph 31
61. Respondent affirmatively states that he has fully complied with the required disclosure as required under the Residential Lead-Based Paint Hazard Reduction Act of 1992, 42 U.S.C §§4851 et seq.

62. Respondent affirmatively states as part of the rental agreement he gave Latoya Holman a lead paint pamphlet along with any required disclosure containing the signature of the respondent and the tenant
63. Respondent does not have the ability to pay the proposed fine as requested by the EPA
64. Respondent requests a hearing on this complaint and grant him applicable relief under the law

 09/16/09
Michael Cannon Date

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