

Complainant's Exhibit List Index

Exhibit Number	Description of Exhibit
CX 1	Curriculum Vitae (CV) of Mr. Paul Ruge
CX 2	Curriculum Vitae (CV) of Mr. Craig Yussen
CX 3	Prime Cut Paint Inspection Report
CX 4	Prime Cut Paint Inspection Photograph Log Sheet
CX 5	Inspection Photograph 1
CX 6	Inspection Photograph 2
CX 7	Inspection Photograph 3
CX 8	Inspection Photograph 4
CX 9	Inspection Photograph 5
CX 10	Inspection Photograph 6
CX 11	Inspection Photograph 7
CX 12	Inspection Photograph 8
CX 13	Inspection Photograph 9
CX 14	Inspection Photograph 10
CX 15	Inspection Photograph 11
CX 16	Inspection Photograph 12
CX 17	Inspection Photograph 13
CX 18	Inspection Photograph 14
CX 19	Inspection Photograph 15
CX 20	Inspection Photograph 16
CX 21	Inspection Photograph 17
CX 22	Inspection Photograph 18
CX 23	Inspection Photograph 19
CX 24	Inspection Photograph 20
CX 25	Inspection Photograph 21
CX 26	Inspection Photograph 22
CX 27	Inspection Photograph 23
CX 28	Inspection Photograph 24
CX 29	Inspection Photograph 25
CX 30	Inspection Photograph 26
CX 31	Inspection Photograph 27
CX 32	Inspection Photograph 28
CX 33	Inspection Photograph 29
CX 34	Paul Ruge Inspector Proof of Credential
CX 35	Federal Lead- Based Paint Program Database (Lack of Individual Certification)

CX 36	Federal Lead- Based Paint Program Database (Lack of Firm Certification)
CX 37	Contract & Work Detail Agreement for 114 S. Broad Street Suffolk, VA 23434
CX 38	Work Detail Agreement for 238 Mt. Vernon Ave. Portsmouth, VA 23707
CX 39	Work Detail Agreement for 3716 Northmoor Ct. Virginia Beach, VA 23452
CX 40	Work Detail Agreement for 3403 Broadway St. Portsmouth, VA 23703
CX 41	Property Detail Report for 114 S. Broad Street Suffolk, VA 23434
CX 42	Property Detail Report for 238 Mt. Vernon Ave. Portsmouth, VA 23707
CX 43	Property Detail Report for 3716 Northmoor Ct. Virginia Beach, VA 23452
CX 44	Property Detail Report for 3403 Broadway St. Portsmouth, VA 23703
CX 45	Inspection Notification Letter (Prime Cut 1414 Baychester Avenue Office)
CX 46	Respondent's Correspondence with Paul Ruge Affirming 1414 Baychester Avenue as Site for Records Inspection
CX 47	Notice of Inspection & Consent for Access To Worksite (114 South Broad Street)
CX 48	Paul Ruge's Inspection Notes
CX 49	Declaration Letter of Daniel Gillis
CX 50	Gillis Photographs # 1-3
CX 51	Gillis Photographs # 4-7
CX 52	Gillis Photograph #8
CX 53	Paul Ruge Letter in Response to Daniel Gillis' Tip
CX 54	Gina Gillis' Correspondence with Paul Ruge Concerning Scraping & Power-washing by Respondent
CX 55	Gina Gillis Correspondence with Paul Ruge Concerning Child's Elevated Blood Levels
CX 56	Gillis Lab Visit for Child's Elevated Capillary Lead Levels*
CX 57	Gina Gillis Correspondence with Respondent 7.10.19 through 8.20.19
CX 58	Respondent's Email to Gina Gillis Acknowledging Distribution of the Incorrect Lead Pamphlet
CX 59	The "Lead Hazard" Pamphlet Distributed by Respondent to the Renovation Properties
CX 60	EPA's "Renovate Right" Pamphlet. Available online at https://www.epa.gov/sites/default/files/2020-09/documents/renovaterightbrochurecolor.pdf
CX 61	Prime Cut Paint Penalty Calculation Worksheet
CX 62	Dun & Bradstreet Report Prime Cut Paint
CX 63	Consolidated Enforcement Response and Penalty Policy for the Pre-Renovation Education Rule; Renovation, Repair and Painting Rule; and Lead-Based Paint Activities Rule (Aug. 2010). Available online at: https://www.epa.gov/sites/default/files/2020-06/documents/revisedlbpcconsolidatederpp.pdf
CX 64	2018 Penalty Policy Inflation Memo and 2018 Penalty Inflation Rule (Jan. 2018) (2018 Inflation Memo). Available online at: https://thefederalregister.org/83-FR/1190
CX 65	Guidance on Evaluating a Violator's Ability to Pay a Civil Penalty in an Administrative Enforcement Action (June 2015) (ATP Guidance). Available online at: https://www.epa.gov/sites/default/files/2015-06/documents/atp-penalty-evaluate-2015.pdf
CX 66	Proof of Service of the Administrative Complaint & Receipt
CX 67	Respondent's Initial Response to the Complaint

CX 68	Respondent's Revised Answer to the Complaint
CX 69	EPA Delegation of Authority 12-2A. Administrative Enforcement: Issuance of Complaints and Signing of Consent Agreements.
CX 70	15 U.S.C.A. § 2681. Definitions. Available online at: https://www.law.cornell.edu/uscode/text/15/2681
CX 71	40 CFR Part 745- Lead-Based Paint Poisoning Prevention in Certain Residential Structures Subpart E- Residential Property Renovations. 40 C.F.R. § 745.83. Available online at: https://www.ecfr.gov/current/title-40/chapter-I/subchapter-R/part-745/subpart-E
CX 72	<i>Consolidated Rules of Practice</i> , 40 C.F.R. Part 22.
CX 73	Respondent's Email to the Office of Administrative Law Judge's Clerk