

**From:** [Melvin Raymond](#)  
**To:** [Bieri, Britt](#)  
**Subject:** Re: In the matter of Wilson's Pest Control  
**Date:** Wednesday, June 21, 2023 9:35:30 AM

---

Mr. Bieri,

I met with my client and reviewed and discussed with him the Notice of Potential Violation and Opportunity to Confer. While my client appreciates the opportunity to participate in pre-filing negotiations, he has authorized me to notify you that he is not interested in an administrative settlement of this matter.

Sincerely,  
Melvin Raymond

NOTE: The information contained in this an e-mail message, including any attachments, is legally privileged and confidential. If you are not the intended recipient, you are hereby notified that any reading, use or dissemination of this message is strictly prohibited. If you have received this message in error, please immediately notify us by telephone at (314) 534-2800 and delete this message from your system. Although this e-mail and any attachments are believed to be free of any virus or other defect that might affect any computer system into which it is received and opened, it is the responsibility of the recipient to ensure that it is virus free, and no responsibility is accepted by the sender for any loss or damage arising in any way from its use.

On Tuesday, June 13, 2023 at 08:13:10 AM CDT, Bieri, Britt <[bieri.britt@epa.gov](mailto:bieri.britt@epa.gov)> wrote:

Thanks Melvin. Yes, the meeting can be held via telephone.

**Britt Bieri** | Attorney  
Office of Regional Counsel  
United States Environmental Protection Agency, Region 7  
913.551.7647 | 11201 Renner Boulevard, Lenexa, Kansas 66219

May contain sensitive communication for internal deliberations only, attorney-client communication, attorney work product, and/or enforcement sensitive information. Do not distribute outside the U.S. Government.

---

**From:** Melvin Raymond <[mraymondattorney1@att.net](mailto:mraymondattorney1@att.net)>  
**Sent:** Monday, June 12, 2023 5:47 PM  
**To:** Bieri, Britt <[bieri.britt@epa.gov](mailto:bieri.britt@epa.gov)>  
**Subject:** Re: In the matter of Wilson's Pest Control

Mr. Bieri,

Please excuse the delay in getting back to you. I plan on getting with my client this week and review the forms you sent and get back with you later this week with dates we can meet to discuss possibly settlement of this matter. Will the meeting be by telephone?.

Sincerely,  
Melvin Raymond

NOTE: The information contained in this an e-mail message, including any attachments, is legally privileged and confidential. If you are not the intended recipient, you are hereby notified that any reading, use or dissemination of this message is strictly prohibited. If you have received this message in error, please immediately notify us by telephone at (314) 534-2800 and delete this message from your system. Although this e-mail and any attachments are believed to be free of any virus or other defect that might affect any computer system into which it is received and opened, it is the responsibility of the recipient to ensure that it is virus free, and no responsibility is accepted by the sender for any loss or damage arising in any way from its use.

On Monday, May 22, 2023 at 02:56:14 PM CDT, Bieri, Britt <[bieri.britt@epa.gov](mailto:bieri.britt@epa.gov)> wrote:

Mr. Raymond-Please let me know the status of this matter on your end and provide some dates for a meeting.

Thanks,

**Britt Bieri** | Attorney  
Office of Regional Counsel  
United States Environmental Protection Agency, Region 7  
913.551.7647 | 11201 Renner Boulevard, Lenexa, Kansas 66219

May contain sensitive communication for internal deliberations only, attorney-client communication, attorney work product, and/or enforcement sensitive information. Do not distribute outside the U.S. Government.

---

**From:** Bieri, Britt  
**Sent:** Tuesday, May 16, 2023 2:06 PM  
**To:** Melvin Raymond <[mraymondattorney1@att.net](mailto:mraymondattorney1@att.net)>  
**Subject:** RE: In the matter of Wilson's Pest Control

Hi Mr. Raymond-

Can you let me know the status of this matter and provide me with some dates for a meeting?

Thanks,

**Britt Bieri** | Attorney  
Office of Regional Counsel  
United States Environmental Protection Agency, Region 7  
913.551.7647 | 11201 Renner Boulevard, Lenexa, Kansas 66219

May contain sensitive communication for internal deliberations only, attorney-client communication, attorney work product, and/or enforcement sensitive information. Do not distribute outside the U.S. Government.

---

**From:** Bieri, Britt  
**Sent:** Friday, May 5, 2023 2:29 PM  
**To:** Melvin Raymond <[mraymondattorney1@att.net](mailto:mraymondattorney1@att.net)>  
**Subject:** RE: In the matter of Wilson's Pest Control

Hi Mr. Raymond-

Thanks for send me this email and for chatting with me last week.

Per our discussion, Wilson's Pest Control may want to make a claim that it is unable to pay the penalty (ATP Claim). If your client wants to make an ATP Claim, below is a list of what we need to get the process/analysis started:

1. Wilson Pest Control's complete tax filings (with all schedules attached) for the past 3 years.
2. The appropriate completed ATP form. I have attached both the individual and business ATP forms. Please refer to the chart below to determine the appropriate form. The type of form needed depends upon the tax forms your client uses to file taxes.

TAX FORM	ENTITY TYPE	MODEL USED	ATP FORM USED
IRS FORM 1040	Sole Proprietorship Or Individual	INDIPAY	Individual
IRS FORM 1040	Single-Member LLCs	ABEL	Business
IRS FORM 1120	C-Corporation	ABEL	Business
IRS FORM 1120S	S-Corporation	ABEL	Business
IRS FORM 8832	Multi-Member LLC That Will Be Treated As An S Or C Corporation	ABEL	Business
IRS FORM 1065	Partnership	ABEL	Business

Please send the completed form and tax filings to my attention at the address below, or get them to me by other means. We need these asap in order to get this process started.

As we further discussed, we also need to schedule a prefiling/settlement conference. This can be done by phone or video conference.

Please give me a few dates and time that work for you and your client's schedule. The meeting should last no more than an hour. I am out of the office May 24-June 7. I think it makes sense to have a discussion before May 24 if possible, even if we do not yet have the financial analysis complete.

Let me know if you have any questions.

Thanks,

**Britt Bieri** | Attorney  
Office of Regional Counsel  
United States Environmental Protection Agency, Region 7  
913.551.7647 | 11201 Renner Boulevard, Lenexa, Kansas 66219

May contain sensitive communication for internal deliberations only, attorney-client communication, attorney work product, and/or enforcement sensitive information. Do not distribute outside the U.S. Government.

---

**From:** Melvin Raymond <[mraymondattorney1@att.net](mailto:mraymondattorney1@att.net)>  
**Sent:** Thursday, April 27, 2023 6:18 PM  
**To:** Bieri, Britt <[bieri.britt@epa.gov](mailto:bieri.britt@epa.gov)>  
**Subject:** In the matter of Wilson's Pest Control

Dear Mr. Bieri,

By this email I am providing you with my new email address, as we discussed.

Sincerely,  
Melvin L. Raymond  
Counsel for Wilson's Pest Control

NOTE: The information contained in this an e-mail message, including any attachments, is legally privileged and confidential. If you are not the intended recipient, you are hereby notified that any reading, use or dissemination of this message is strictly prohibited. If you have received this message in error, please immediately notify us by telephone at (314) 534-2800 and delete this message from your system. Although this e-mail and any attachments are believed to be free of any virus or other defect that might affect any computer system into which it is received and opened, it is the responsibility of the recipient to ensure that it is virus free, and no responsibility is accepted by the sender for any loss or damage arising in any way from its use.