

STATE OF CALIFORNIA

CALIFORNIA DEPARTMENT OF RESOURCES RECYCLING & RECOVERY

In the matter of:

REQUEST FOR A HEARING/NOTICE OF DEFENSE

GLOBAL WASTE MANAGEMENT, INC.

2013-000010-REV

AGENCY NO. 2013-011151-ADC

TPID NO: 1613306-01

RESPONDENTS.

I, Randall Knox, in the above-entitled proceeding, acknowledge receipt of a copy of the Statement of Issues for Resolution of Minor Waste Tire Facility and Administrative Complaint for Waste Tire Storage and Waste Tire Hauler Administrative Penalties.
(Fill in full title of Statement of Issues or Administrative Complaint [Accusation].)

I hereby:

Request a hearing.

The basis for my request is the following:

The core material facts in dispute regarding tire counts, tire storage, use of unregistered tire haulers, compliance with Cleanup and Abatement Order, access to records and notice of on-site changes, Global further contests the impartiality of the inspectors and the agency

Further, I hereby:

- Object to the Accusation for failure to state acts or omissions upon which the agency may proceed.
- Object to the form of the Accusation in that the transaction cannot be identified or a defense prepared.
- Present new matter by way of defense.

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- () Admit the Accusation in whole or in part.
- () Object to the Accusation on the basis that compliance with the requirements of a regulation would result in a material violation of a regulation enacted by another department affecting substantive rights.

All correspondence concerning this proceeding should be sent to Respondent at the following address: Randall Knox

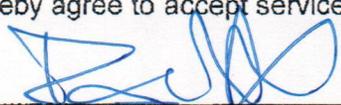
(If you are represented by an attorney, all correspondence concerning this matter will be sent to the attorney.)

870 Market Street, Suite 800
Address:

City: San Francisco State: CA Zip Code: 94109

Telephone: (415) 765-7500 Email: Randy.knox@aol.com

I hereby agree to accept service of all correspondence by email.

Signature: 

Date: 9/25/13

Please send to:

CalRecycle Legal Office
Attention: Gloria Bell
P.O. Box 4025, MS 24-B
Sacramento, CA 95812-4125