

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS
BOARD OF REGISTRATION OF
HAZARDOUS WASTE SITE CLEANUP PROFESSIONALS

)	
In the Matter of:)	
)	
James J. Decoulos,)	
Respondent)	Docket No.: LSP-10AP-01
)	

MOTION TO SUPPORT RELEVANCY OF PUBLIC RECORDS

Now comes the Respondent, James J. Decoulos, who hereby moves this forum to conduct an in camera inspection of all documents from witness John Fitzgerald of the Massachusetts Department of Environmental Protection (“MassDEP”) that Respondent has sought for his defense in this matter under the Massachusetts Public Records Law, G. L. c. 66, § 10, and the Public Records Access Regulations, 950 CMR 32.00, *et seq.*

On September 1, 2010, Respondent sought “All notes and internal MassDEP communication John Fitzgerald has generated or received related in any way to the work of the LNAPL Workgroup.” In support of this motion, Respondent has prepared an affidavit this date (the “Decoulos Aff. #9”).

Once the Presiding Officer has reviewed Decoulos Aff. #9 and conducted his in camera inspection of both redacted and withheld MassDEP documents, Respondent moves that the relevant documents be immediately released so that he may prepare additional supporting testimony in his defense.

Dated: December 3, 2010

Respectfully submitted,



James J. Decoulos *pro se*
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STATEMENT OF SERVICE

I, James J. Decoulos, do hereby certify that I caused a copy of the MOTION TO SUPPORT RELEVANCY OF PUBLIC RECORDS and the supporting AFFIDAVIT OF JAMES J. DECOULOS dated December 3, 2010 to be served on the following parties by electronic mail:

Anne Hartley, Case Administrator OADR
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Signed under the penalties of perjury this 3rd day of December, 2010.



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