

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF THE BRONX: HOUSING PART H

MARGARET ADARKWA, AUGUSTINA AMEDUME,
AARON ASIEDU, SHANIL BAEZ, DERRICK COX,
SAMANTHA DIAZ, MARIE LUCILE DORVIL,
AUGUSTINA ESCOBALES, MERCEDES ESCOTO,
JINETTE FERNANDEZ GOMEZ, HAMIDOU
HAIDARA, MERCEDES MARTE, ISAURA
MARTINEZ, MOHAMED NIANGADOU, JANE
PHILLIPS, CYNTHIA POUGH, DIGNA RAMIREZ,
ARISLEYDA REYNOSO, EVELIN de la ROSA, DAISY
SANTOS, IBRAHIM SIBIDE, and OUMAROU
TRAORE,

Petitioners,

-against-

ANDERSON A LLC, ANDERSON B LLC, ANDERSON
C LLC, ANDERSON D LLC, ANDERSON E LLC,
ANDERSON F LLC, ANDERSON G LLC, EEG MW
LLC, LIVING EMERALD NY LLC, ISAAC KASSIRER,
GARY KASSIRER, and FRANSISCO BRETON,

Respondents,

-and-

NEW YORK CITY DEPARTMENT OF HOUSING
PRESERVATION AND DEVELOPMENT and NEW
YORK CITY DEPARTMENT OF HEALTH AND
MENTAL HYGIENE,

Co-Respondents.

INDEX NO. L&T

VERIFIED PETITION

1187 Anderson Avenue
Bronx, NY 10452

Petitioners, by their attorneys, BRONX LEGAL SERVICES, petition and allege as follows:

PRELIMINARY STATEMENT

1. In 2017, Defendant Isaac Kassirer, the investor behind Emerald Equity Group, and his agents purchased a cluster of six buildings near each other in Bronx zip code 10542: 1220 Shakespeare Avenue, 1210 Woodycrest Avenue, 1230 Woodycrest Avenue, 1191 Anderson

Avenue, 1195 Anderson Avenue, and the subject building, 1187 Anderson Avenue. Since the new owners took over, the buildings began to fall into disrepair.

2. As the owners' neglect has continued, the tenants of 1187 Anderson have been forced to live with rodent and cockroach infestations, leaks, a broken elevator, and a serious lack of security, among other dangerous conditions. The owner has even stopped paying the utility bills; the tenants received shutoff notices from Con Edison, and they could lose heat at any time.

3. Petitioners now seek an Order to Correct and imposition of civil penalties for Respondents' failure to maintain housing quality standards and to correct the conditions affecting the life, health, and safety of Petitioners.

4. HPD has issued a total of 66 violations for the subject premises. This includes 18 Class A violations, 37 Class B violations, and 11 Class C violations. See Exhibit A (HPD Violations).

THE SUBJECT BUILDING AND PARTIES

5. The subject building in the instant case is located at 1187 Anderson Avenue, Bronx, New York 10452.

Petitioners

6. The individual petitioners set forth below are tenants or lawful occupants entitled to enforce the Housing Maintenance Code under law. The term "resides" shall include, without limitation, those who reside by tenancy, co-tenancy, sublease, and/or license of the tenant. Each of the individual petitioners resides in the specified apartments at the subject building.

7. Petitioner **MARGARET ADARKWA** resides in Apartment 3A in the subject building.

8. Petitioner **AUGUSTINA AMEDUME** resides in Apartment 5B in the subject building.
9. Petitioner **AARON ASIEDU** resides in Apartment 6C in the subject building.
10. Petitioner **SHANIL BAEZ** resides in Apartment 1F in the subject building.
11. Petitioner **DERRICK COX** resides in Apartment 4D in the subject building.
12. Petitioner **SAMANTHA DIAZ** resides in Apartment 2C in the subject building.
13. Petitioner **MARIE LUCILE DORVIL** resides in Apartment 4B in the subject building.
14. Petitioner **AUGUSTINA ESCOBALES** resides in Apartment 6F in the subject building.
15. Petitioner **MERCEDES ESCOTO** resides in Apartment 2F in the subject building.
16. Petitioner **JINETTE FERNANDEZ GOMEZ** resides in Apartment 2E in the subject building.
17. Petitioner **HAMIDOU HAIDARA** resides in Apartment 4E in the subject building.
18. Petitioner **MERCEDES MARTE** resides in Apartment 2B in the subject building.
19. Petitioner **ISAURA MARTINEZ** resides in Apartment 3D in the subject building.
20. Petitioner **MOHAMED NIANGADOU** resides in Apartment 4A in the subject building.
21. Petitioner **JANE PHILLIPS** resides in Apartment 5C in the subject building.
22. Petitioner **CYNTHIA POUGH** resides in Apartment 4F in the subject building.
23. Petitioner **DIGNA RAMIREZ** resides in Apartment 6B in the subject building.
24. Petitioner **ARISLEYDA REYNOSO** resides in Apartment 5E in the subject building.

25. Petitioner **EVELIN de la ROSA** resides in Apartment B2 in the subject building.
26. Petitioner **DAISY SANTOS** resides in Apartment 2A in the subject building.
27. Petitioner **IBRAHIM SIBIDE** resides in Apartment 6A in the subject building.
28. Petitioner **OUMAROU TRAORE** resides in Apartment 6E in the subject building.

Respondents

29. Respondent **ANDERSON A LLC** is an owner of the subject premises pursuant to a deed dated November 28, 2017. See Exhibit B (Deed). According to its Multiple Dwelling Building Registration, their address is listed as 1820 Swarthmore Avenue #499, Lakewood, NJ 08701. See Exhibit C (Multiple Dwelling Building Registration Property Owner Registration Information).

30. Respondent **ANDERSON B LLC** is an owner of the subject premises pursuant to a deed dated November 28, 2017. See Exhibit B. According to the New York State Department of State Division of Corporations, their address is listed as 1 Battery Park Plaza, Suite 3100, New York, NY 10004. See Exhibit D (New York State Department of State Division of Corporations Entity Information).

31. Respondent **ANDERSON C LLC** is an owner of the subject premises pursuant to a deed dated November 28, 2017. See Exhibit B. According to the New York State Department of State Division of Corporations, their address is listed as 1 Battery Park Plaza, Suite 3100, New York, NY 10004. See Exhibit D.

32. Respondent **ANDERSON D LLC** is an owner of the subject premises pursuant to a deed dated November 28, 2017. See Exhibit B. According to the New York State Department of State Division of Corporations, their address is listed as 1 Battery Park Plaza, Suite 3100, New York, NY 10004. See Exhibit D.

33. Respondent **ANDERSON E LLC** is an owner of the subject premises pursuant to a deed dated November 28, 2017. See Exhibit B. According to the New York State Department of State Division of Corporations, their address is listed as 1 Battery Park Plaza, Suite 3100, New York, NY 10004. See Exhibit D.

34. Respondent **ANDERSON F LLC** is an owner of the subject premises pursuant to a deed dated November 28, 2017. See Exhibit B. According to the New York State Department of State Division of Corporations, their address is listed as 1 Battery Park Plaza, Suite 3100, New York, NY 10004. See Exhibit D.

35. Respondent **ANDERSON G LLC** is an owner of the subject premises pursuant to a deed dated November 28, 2017. See Exhibit B. According to the New York State Department of State Division of Corporations, their address is listed as 1 Battery Park Plaza, Suite 3100, New York, NY 10004. See Exhibit D.

36. Respondent **FRANSISCO BRETON** is the managing agent for the subject building. According to the Multiple Dwelling Building Registration, his addresses are listed as 1820 Swarthmore Avenue #499, Lakewood, NJ 08701 and 2483 Cambreleng Avenue, #LL, Bronx, NY 10458. See Exhibit C.

37. Respondent **EEG MW LLC** is the manager of the subject building according to the deed. See Exhibit B. Upon information and belief, this corporation does business as Emerald Equity Group. According to the New York State Department of State Division of Corporations, their address is listed as 1 Battery Park Plaza, Suite 3100, New York, NY 10004. See Exhibit D.

38. Respondent **ISAAC KASSIRER** is the agent for Respondent EEG MW LLC and manager of the subject building according to the deed. See Exhibit B. Upon information and belief, he is a real estate investor who owns Emerald Equity Group and controls Respondent

shell companies Anderson A LLC, Anderson B LLC, Anderson C LLC, Anderson D LLC, Anderson E LLC, Anderson F LLC, and Anderson G LLC (*hereinafter*, “Respondent Owners”). Kassirer, as the agent for EEG MW LLC, maintains a business address at 1 Battery Park Plaza, Suite 3100, New York, NY 10004. See Exhibit D.

39. Respondent **LIVING EMERALD NY LLC** is the management company for the subject building. According to their website, their address is 36 Airport Rd. #307 Lakewood, NJ 08701. See “Living Residential,” *available at* <https://www.livingemerald.com/places.html> (last visited April 29, 2022). This is also their address according to the New York State Department of State Division of Corporations. See Exhibit D.

40. Respondent **GARY KASSIRER** is the founder and Chief Executive Officer of the company doing business as Living Residential, which upon information and belief is Defendant Living Emerald NY LLC. As CEO of Living Residential, upon information and belief, he maintains a business address at 36 Airport Road #307, Lakewood, NY 08701. See Exhibit D. His address is the same according to the Living Residential website. See “Living Residential,” *available at* <https://www.livingemerald.com/people.html> (last visited April 29, 2022).

Co-Respondents

41. Co-Respondent **NEW YORK CITY DEPARTMENT OF HOUSING, PRESERVATION, AND DEVELOPMENT (“HPD”)** is a city agency. Their Housing Litigation Bureau is located at 100 Gold Street, New York, New York 10038

42. Co-Respondent **NEW YORK CITY DEPARTMENT OF HEALTH AND MENTAL HYGIENE (“DOHMH”)** is a city agency charged with enforcing the health and sanitary codes of the City of New York. It is located at 42-09 28th Street, Long Island City, New York 11101.

STATUTORY AND REGULATORY FRAMEWORK

Order to Correct

43. The Housing Part has jurisdiction to enforce the Housing Maintenance Code within Title 27 of the New York City Administrative Code and to enforce housing standards. New York City Civil Court Act § 110(a).

44. An owner of a multiple dwelling must fully comply with the Housing Maintenance Code and has a duty to keep the premises in good repair. See N.Y.C. Admin. Code § 27-2005.

45. Tenants may complain about the repair issues and seek an Order to Correct and civil penalties, or HPD may issue a notice of violation and seek civil penalties. See N.Y.C. Admin. Code §§ 27-2115(b), (h).

46. If a violation exists, the owner is required to correct the conditions and file a certification of compliance that the violation has been corrected prior to the certification date provided in the notice of violation. See N.Y.C. Admin. Code § 27-2115(h).

47. Indeed, “[f]ailure to file such certification of compliance shall establish a prima facie case that such violation has not been corrected.” See N.Y.C. Admin. Code § 27-2115(f)(7).

48. For any non-hazardous conditions complained of by the tenants, the Court may issue an Order to Correct if tenants have complained of a condition existing in the subject building or apartments and no violation has been placed after thirty (30) days. See N.Y.C. Admin. Code § 27-2115(h).

49. For any hazardous conditions, the Court may issue an Order to Correct without regard to whether thirty days has passed since the tenants first complained about the condition. See N.Y.C. Admin. Code § 27-2115(i).

Civil Penalties

50. A tenant or group of tenants may also seek to obtain civil penalties against a landlord who was already notified of violations of housing standards and has not certified that the repairs have been made. See N.Y.C. Admin. Code § 27-2115(h).

51. Any owner who violates the housing standards set forth in the New York City Administrative Code and relevant regulations “shall be subject to civil penalties of not less than ten dollars nor more than fifty dollars for each non-hazardous violation, not less than twenty-five dollars nor more than one hundred and ten dollars per day for each hazardous violation . . . and, in addition, one hundred twenty-five dollars per day for each immediately hazardous violation . . . from the date set for correction in the notice of violation until the violation is corrected.” See N.Y.C. Admin. Code § 27-2115(a).

Rodent Infestation

52. Section 27-2018 of the Administrative Code of the City of New York requires:

- a. “The owner or occupant in control of a dwelling shall keep the premises free from rodents, and from infestations of insects and other pests, and from any condition conducive to rodent or insect and other pest life.
- b. When any premises are subject to infestation by rodents or insects and other pests, the owner or occupant in control shall apply continuous eradication measures.
- c. When the department makes the determination that any premises are infested by rodents, insects or other pests, it may order such eradication measures, as the department deems necessary.”

N.Y.C. Admin. Code § 27-2018.

53. Section 151.02 of the New York City Health Code further requires that premises “shall be kept free from rodents, insects and other pests, and from any conditions conducive to pests. The person in control of such premises shall take such measures as may be necessary to prevent and control the harborage and free movement of rodents, insects and other pests.”

54. Section 151.04 of the New York City Health Code authorizes the Department of Health and Mental Hygiene to enforce New York City Health Code Article 151, concerning rodents, insects, and other pests.

CONDITIONS AND VIOLATIONS

55. Petitioners reside in the subject premises and have endured significant hazardous and non-hazardous issues that are building-wide, and within their individual apartments.

56. HPD has issued a total of 66 violations for the subject building that include 18 Class A violations, 37 Class B violations, and 11 Class C violations, in a building with only 37 residential units. A copy of the open violation history from the HPD website is annexed hereto as Exhibit "A".

Common Areas

57. Petitioners endured hazardous and nonhazardous conditions in the building and common areas. Respondents' agents have not repaired the conditions enumerated below:

Entry and Lobby

- a. The entry door lock is defective and is easily opened without a key. Upon information and belief, this condition is the subject of HPD Class B Violation 15110046.
- b. The intercom does not work.

Elevator

- a. The elevator is often out of service.

Laundry Room

- a. The laundry room has been closed for a long time.

Throughout the Common Areas of the Building

- a. The common areas need to be painted.
- b. There is a rodent infestation.
- c. There is a cockroach infestation.
- d. The common areas are dirty and poorly maintained.
- e. Due to the aforementioned building-wide conditions, including but not limited to the entry door defects, there is a lack of security in the building. This has led to drug use and noise in the common areas, which interferes with Petitioners' quiet enjoyment of their homes.

Individual Apartments

58. Petitioner **MARGARET ADARKWA** resides in **APARTMENT 3A**. Petitioner Adarkwa has been living with the following hazardous and nonhazardous conditions:
- a. **Kitchen.** The following conditions exist in the kitchen:
 - i. There is a leak under the kitchen sink.
 - ii. Kitchen sink cabinet is rotting due to the aforementioned leak.
 - iii. Stove is not working. No flame or heat.
 - b. **Bathroom.** Bathtub is peeling and needs to be re-glazed.
 - c. **Living Room.** Outlets do not work. No power.
 - d. **Heat.** There is insufficient heat in the apartment.
 - e. **Mice.** There is an infestation of mice in the apartment.
 - f. **Roaches.** There is an infestation of roaches in the apartment.
 - g. **Paint.** The entire apartment needs to be painted.
 - h. **Intercom.** The intercom does not work.

59. Petitioner **AUGUSTINA AMEDUME** resides in **APARTMENT 5B**. Petitioner

Amedume has been living with the following hazardous and nonhazardous conditions:

a. **Kitchen.** The following conditions exist in the kitchen:

- i. The kitchen cabinets are broken and damaged. The bottoms are worn out and some doors have fallen off or do not close.
- ii. The refrigerator requires repair.

b. **Bathroom.** Bathtub is rusty and needs to be re-glazed, and is not set properly.

c. **Bed Room.** The closet door is off its track.

d. **Roaches.** There is an infestation of roaches in the apartment.

e. **Intercom.** The intercom does not work.

60. Petitioner **AARON ASIEDU** resides in **APARTMENT 6C**. Petitioner Asiedu has been living with the following hazardous and nonhazardous conditions:

a. **Kitchen.** The following conditions exist in the kitchen:

- i. Broken kitchen floor tiles.
- ii. Cabinets do not close and are damaged.

b. **Bathroom.** The following conditions exist in the bathroom:

- i. There is mold on the wall.
- ii. Tiles are falling off the wall.
- iii. The toilet moves and leaks from the bottom.

c. **Floors.** Wood floors throughout the apartment need to be refinished.

d. **Mice.** There is an infestation of mice in the apartment.

e. **Roaches.** There is an infestation of roaches in the apartment.

f. **Paint.** The entire apartment needs to be painted. Upon information and belief this condition is subject to a class A violation number 14060485.

g. **Windows.** The windows in the living room as well as both bedrooms do not stay open.

h. **Bedroom.** The first bedroom ceiling has water damage.

i. **Intercom.** The intercom does not work.

61. Petitioner **SHANIL BAEZ** resides in **APARTMENT 1F**. Petitioner Baez has been living with the following hazardous and nonhazardous conditions:

a. **Kitchen.** The following conditions exist in the kitchen:

- i. Oven is not working properly.
- ii. Kitchen wall above the cabinets is damaged and peeling.

b. **Bathroom.** The following conditions exist in the bathroom:

- i. The floor is sinking.
- ii. The bathtub needs to be re-glazed and has a hole.
- iii. There is mold on the bathroom ceiling and walls which needs to be properly abated and not just painted over.

c. **Living Room.** Windows need repair and an outlet is not properly affixed to the wall.

d. **Hallway.** Wall near the ceiling is damaged and cracked.

e. **Floors.** Wooden floors are uneven with loose boards, and require repair and releveling.

f. **Bedroom.** Electrical outlet is damaged and hazardous.

g. **Second Bedroom.** Closet door is not fitted properly.

h. **Apartment door.** Does not self-close and handle is damaged.

i. **Trash.** Trash is left immediately outside the apartment attracting vermin such that apartment windows cannot be opened without admitting such vermin.

j. **Rats.** There is an infestation of rats in and around the apartment.

k. **Roaches.** There is an infestation of roaches in the apartment.

l. **Intercom.** The intercom does not work.

62. Petitioner **DERRICK COX** resides in **APARTMENT 4D**. Petitioner Cox has been living with the following hazardous and nonhazardous conditions:

a. **Kitchen.** The following conditions exist in the kitchen:

i. Water damage to paint and plaster on kitchen ceiling caused by leak from above.

ii. Kitchen wooden floor bulging and cracking.

b. **Bathroom.** The following conditions exist in the bathroom:

i. Water damage to paint and plaster on bathroom ceiling caused by leak from above.

ii. Door warped from water damage.

iii. Bathroom sink requires repair.

c. **Hallway.** Closet door coming off track.

d. **Bedroom.** Closet door coming off track.

e. **Paint.** The entire apartment needs to be painted. Upon information and belief this condition is subject to three class A HPD violation numbers 14060438, 14427766, and 14427768.

f. **Intercom.** The intercom does not work.

g. **Rodents.** Rodents can be heard in the walls.

63. Petitioner **SAMANTHA DIAZ** resides in **APARTMENT 2C**. Petitioner Diaz has been living with the following hazardous and nonhazardous conditions:

a. **Kitchen.** The following conditions exist in the kitchen:

- i. There is a leak under the kitchen sink.
- ii. Kitchen cabinets need to be replaced as they are corroded and rotting.

b. **Bathroom.** The following conditions exist in the bathroom:

- i. The bathtub is peeling and needs to be re-glazed.
- ii. The caulk around the bathtub is peeling and cracked.
- iii. The toilet is leaking.

c. **First Bedroom.** Outlets need covers.

d. **Second Bedroom.** There are cracks in the wall by the radiators, and the radiators themselves are splitting and cracking.

e. **Closets.** All closet doors are breaking apart and have broken knobs.

f. **Roaches.** There is an infestation of roaches in the apartment.

g. **Paint.** The entire apartment needs to be painted.

h. **Intercom.** The intercom does not work.

64. Petitioner **MARIE LUCILE DORVIL** resides in **APARTMENT 4B**. Petitioner Dorvil has been living with the following hazardous and nonhazardous conditions:

a. **Bathroom.** The following conditions exist in the bathroom:

- i. There is a reoccurring leak in the bathroom ceiling which has caused a hole in the ceiling. Cause of leak must be addressed as leak has been

reoccurring over past 8 years. Upon information and belief this condition is subject to two class B HPD violation numbers 14886825 and 14886826.

ii. There is mold in the bathroom

b. Kitchen. There is a leak under the kitchen sink, and the cabinet under the sink is rotting.

c. Living Room. The following conditions exist in the living room:

i. Outlets are erratic and hazardous.

ii. Floorboards are loose. Need to be secured, sanded, and refinished.

iii. There are holes in the windowsill.

d. Roaches. There is an infestation of roaches in the apartment.

e. Paint. The entire apartment needs to be painted.

f. Intercom. The intercom does not work. Upon information and belief this condition is subject to two class B HPD violation numbers 15110043 and 14886828.

65. Petitioner **AUGUSTINA ESCOBALES** resides in **APARTMENT 6F**. Petitioner Escobales has been living with the following hazardous and nonhazardous conditions:

a. Door. Apartment door is not self-closing.

b. Closets. Closet doors are damaged (1 in bedroom and 1 in living room)

c. Mailbox. Does not close completely.

66. Petitioner **MERCEDES ESCOTO** resides in **APARTMENT 2F**. Petitioner Escoto has been living with the following hazardous and nonhazardous conditions:

a. Bathroom. The following conditions exist in the bathroom:

i. There is a reoccurring leak in the ceiling.

ii. Wall above the toilet has opened up due to the aforementioned leak.

- iii. Toilet regularly clogs.
- iv. Bathtub regularly clogs.
- v. Sink regularly clogs.

b. Kitchen. There is a leak under the kitchen sink and the cabinet is rotting as a result of said leak. Upon information and belief, this condition is subject to a class B HPD violation number 14587793.

c. Closets. Doors do not close properly – hallway and 2 bedroom closets.

d. Windows. All windows are very difficult to open – living room window will not stay open.

e. Outlets. Outlets in both bedrooms don't work.

f. Rats. There is an infestation of rats in the apartment.

g. Roaches. There is an infestation of roaches in the apartment.

h. Paint. The entire apartment needs to be painted.

i. Intercom. The intercom does not work. Upon information and belief this condition is subject to a class B HPD violation number 14587777.

j. Carbon Monoxide Detector. The carbon monoxide detector is missing from the apartment.

67. Petitioner **JINETTE FERNANDEZ GOMEZ** resides in **APARTMENT 2E**.

Petitioner Fernandez Gomez has been living with the following hazardous and nonhazardous conditions:

a. Bathroom. The following conditions exist in the bathroom:

- i. Bathtub needs to be re-glazed.
- ii. Bathtub fixtures are loose.

iii. Outlet does not work.

b. **Living Room.** Ceiling and closet need to be repainted to cover recent repair work.

c. **Mice.** There is an infestation of mice in the apartment.

d. **Bedbugs.** There is an infestation of bedbugs in the apartment.

e. **Bedroom.** The following conditions exist in the bedroom:

i. Electrical system is damaged and breaker goes off when outlet is used.

ii. Floor is damaged and requires repair.

f. **Apartment Door.** Door lock is damaged and door is not self-closing.

g. **Living Room.** Window is not in frame.

h. **Intercom.** The intercom does not work.

68. Petitioner **HAMIDOU HAIDARA** resides in **APARTMENT 4E**. Petitioner Haidara

has been living with the following hazardous and nonhazardous conditions:

a. **Bathroom.** Holes in wall need to be repaired.

b. **Intercom.** The intercom does not work.

69. Petitioner **MERCEDES MARTE** resides in **APARTMENT 2B**. Petitioner Marte

has been living with the following hazardous and nonhazardous conditions:

a. **Roaches.** There is an infestation of roaches in the apartment.

b. **Intercom.** The intercom does not work.

70. Petitioner **ISAURA MARTINEZ** resides in **APARTMENT 3D**. Petitioner Martinez

has been living with the following hazardous and nonhazardous conditions:

a. **Closet.** Door is not on track and does not close.

b. **Kitchen.** Refrigerator door does not seal.

71. Petitioner **MOHAMED NIANGADOU** resides in **APARTMENT 4A**. Petitioner

Niangadou has been living with the following hazardous and nonhazardous conditions:

a. **Kitchen.** The following conditions exist in the kitchen:

- i. Stove does not work.
- ii. Wooden floor is broken and blackened and requires repair.

b. **Bathroom.** There is a leak and water damage on the ceiling.

c. **Living Room.** Floor is broken and requires repair.

d. **Mice.** There is an infestation of mice in the apartment. Upon information and belief, this condition is subject to a class C HPD violation number 13465784.

e. **Roaches.** There is an infestation of roaches in the apartment. Upon information and belief, this condition is subject to a class C HPD violation number 13465782.

f. **Paint.** The entire apartment needs to be painted.

g. **Intercom.** The intercom does not work.

72. Petitioner **JANE PHILLIPS** resides in **APARTMENT 5C**. Petitioner Phillips has been living with the following hazardous and nonhazardous conditions:

a. **Kitchen.** Refrigerator door does not close properly and food is not kept sufficiently cold.

b. **Bathroom.** The following conditions exist in the bathroom:

- i. Tub needs to be reglazed.
- ii. Medicine cabinet behind mirror is badly rusted and needs to be replaced.
- iii. Door handle is loose and needs to be repaired.

iv. There is a leak and associated water damage in the ceiling. Leak must be repaired at the source.

c. **Bedroom.** The following conditions exist in the bedroom:

- i. Closet door is cracked and needs to be replaced.
- ii. Door handle is loose and needs to be repaired.
- iii. Water leaks in through the window.

d. **Floors.** Floors are cracked and damaged throughout the apartment, and need to be repaired.

e. **Living Room.** Water leaks in by the window.

f. **Paint.** The entire apartment needs to be painted.

g. **Hallway.** Closet door is cracked and needs to be replaced.

73. Petitioner **CYNTHIA POUGH** resides in **APARTMENT 4F**. Petitioner Pough has been living with the following hazardous and nonhazardous conditions:

a. **Kitchen.** The following conditions exist in the kitchen:

- v. Light cover is broken.
- vi. Floor has missing tiles. Tiles are separating and coming up.

b. **Bathroom.** The following conditions exist in the bathroom:

- i. Soap and toothbrush holders are damaged.
- ii. Outlets do not work.
- iii. Sink has a gap between sink and wall.
- iv. Sink stopper is broken and does not work.

c. **First Bedroom.** Window is cracked and one outlet does not work.

d. **Second Bedroom.** An outlet is broken.

e. **Smoke detector.** Does not work.

f. **Apartment door.** The apartment door bottom lock cannot be locked from the outside. Additionally, the door is not properly hinged and drags, and is not self-closing.

g. **Roaches.** There is an infestation of roaches in the apartment.

h. **Mailbox.** Does not properly close.

i. **Intercom.** The intercom does not work.

74. Petitioner **DIGNA RAMIREZ** resides in **APARTMENT 6B**. Petitioner Ramirez has been living with the following hazardous and nonhazardous conditions:

a. **Bathroom.** The following conditions exist in the bathroom:

- i. Bathtub is rusting and peeling, and needs to be re-glazed.
- ii. Vent fan does not work and is rusty. Upon information and belief, this condition is subject to a class B HPD violation number 14572913.
- iii. There is mold in the bathroom.

b. **Bedroom.** Window is cracked and an outlet does not work.

c. **Lead Paint.** There is lead paint which is flaking off and must be properly treated.

d. **Kitchen.** Outlet does not work.

e. **Doors.** Doors throughout the apartment are peeling. Paint must be scraped, and then the doors need to be repainted.

f. **Mice.** There is an infestation of mice in the apartment.

g. **Roaches.** There is an infestation of roaches in the apartment.

h. **Intercom.** The intercom does not work.

i. **Hallway.** Floor is lifting up outside of the bathroom.

75. Petitioner **ARISLEYDA REYNOSO** resides in **APARTMENT 5E**. Petitioner Reynoso has been living with the following hazardous and nonhazardous conditions:
- a. **Bathroom.** The following conditions exist in the bathroom:
 - i. Tub is peeling and needs to be re-glazed.
 - ii. Ceiling is peeling, needs to be scraped and re-painted.
 - b. **Hallway.** Ceiling outside of bathroom is bubbling and falling down.
 - c. **Apartment Door.** Door does not fit so there is a large gap besides the door where one can see into the apartment.
 - d. **Bedroom.** Window sill is coming off the wall.
 - e. **Roaches.** There is an infestation of roaches in the apartment.
 - f. **Intercom.** The intercom does not work.
76. Petitioner **EVELIN de la ROSA** resides in **APARTMENT B2**. Petitioner de la Rosa has been living with the following hazardous and nonhazardous conditions:
- a. **Bathroom.** Bathtub outlet does not work.
 - b. **Living Room.** Outlets are hazardous in that plugs are loose and will not stay in.
 - c. **Intercom.** The intercom does not work.
77. Petitioner **DAISY SANTOS** resides in **APARTMENT 2A**. Petitioner Santos has been living with the following hazardous and nonhazardous conditions:
- a. **Bathroom.** The following conditions exist in the bathroom:
 - i. Walls have a leak causing paint to bubble.
 - ii. Tub needs to be re-glazed.
 - iii. Caulking is damaged.
 - iv. Sink is broken.

b. **Kitchen.** The following conditions exist in the kitchen:

- i. Wooden counter is damaged or defective.
- ii. Sink cabinet is rotting and needs to be replaced.

c. **Living Room.** Windows do not properly close and let cold air in.

d. **Roaches.** There is an infestation of roaches in the apartment.

e. **Paint.** The entire apartment needs to be painted.

f. **Intercom.** The intercom does not work.

78. Petitioner **IBRAHIM SIBIDE** resides in **APARTMENT 6A**. Petitioner Sibide has been living with the following hazardous and nonhazardous conditions:

a. **Kitchen.** The following conditions exist in the kitchen:

- i. Oven does not work.
- ii. Caulk between kitchen and wall needs to be replaced.

b. **Bathroom.** The following conditions exist in the bathroom:

- i. Bathtub is cracked.
- ii. There is mold in the bathroom.
- iii. Tub and sink clog frequently.

c. **Bedroom.** Lights don't work and outlets are not working.

d. **Windows.** Windows throughout the apartment are difficult to close.

e. **Living Room.** Sheetrock is coming off the wall.

f. **Hall.** Wooden floor by entrance and going to the kitchen is damaged and needs repair.

g. **Apartment Door.** The front door to the apartment is not self-closing.

h. **Mice.** There is an infestation of mice in the apartment.

i. **Roaches.** There is an infestation of roaches in the apartment.

j. **Paint.** The entire apartment needs to be painted.

k. **Intercom.** The intercom does not work.

79. Petitioner **OUMAROU TRAORE** resides in **APARTMENT 6E**. Petitioner Traore has been living with the following hazardous and nonhazardous conditions:

a. **Kitchen.** The following conditions exist in the kitchen:

i. Refrigerator does not keep food sufficiently cold and handles are broken.

Needs to be replaced.

ii. Cabinets have broken hinges/handles. Do not close properly.

b. **Bathroom.** The following conditions exist in the bathroom:

i. Bathtub has chipped paint/glaze and exposed metal.

ii. Shower leaks to apartment below.

iii. Toilet does not flush properly.

iv. Sink leaks water.

c. **First bedroom.** Windows do not stay up when open.

d. **Second bedroom.** Windows do not stay up when opened, and closet door is broken.

e. **Paint.** The entire apartment needs to be painted. Upon information and belief this

condition is subject to a class B HPD violation number 13887573.

PRIOR APPLICATIONS

80. No prior application has been made for the relief sought in this petition by the Petitioners.

FIRST CLAIM FOR RELIEF **(Order to Correct)**

81. Petitioners re-allege the allegations set forth in all paragraphs contained above.

82. Petitioners seek an order directing Respondents to correct all Code violations referenced herein, including the above-referenced HPD violations in Petitioners' apartments and further including any and all additional violations found as a result of the inspection requested by Petitioners herein, or otherwise determined by the Court to exist at the subject premises.

SECOND CLAIM FOR RELIEF
(Civil Penalties for failure to correct code violations)

83. Petitioners re-allege the allegations set forth in all paragraphs contained above.

84. Respondents are all "owners" of the subject building, including Petitioners' apartments, within the meaning of the Housing Maintenance Code.

85. HPD has issued notices of violations setting a date for completion of repairs and the hazardous conditions as set forth in Exhibit "A".

86. Petitioners seek civil penalties to be imposed for all hazardous conditions, violations, and non-hazardous complaints that are more than thirty days old as stated herein and incorporated by the annexed exhibits pursuant to Sections 27-2115(h),(i) of the N.Y.C. Administrative Code.

THIRD CLAIM FOR RELIEF
(Attorneys' Fees)

87. Petitioners re-allege the allegations set forth in all paragraphs contained above.

88. Respondents are all "owners" of the subject building, including Petitioners' apartments, within the meaning of the Housing Maintenance Code.

89. Upon information and belief, Petitioners' leases contain a provision for cost and attorney's fees in lawsuits involving the parties, permitting Petitioners to seek such costs and attorney's fees in this proceeding.

WHEREFORE, Petitioners request this Court issue an Order and Judgment:

- i) **ORDERING** the New York City Department of Housing Preservation and Development to perform an immediate and complete inspection of the common areas in the premises and issue appropriate violations for any conditions not in compliance with the Housing Maintenance Code, and other applicable law and regulations;
- j) **FINDING** that the conditions described in this petition constitute violations of law and **DIRECTING** Respondents to correct said violations and any new violations that arise during the pendency of this proceeding within the times provided by Section 27-2115(c) of the Administrative Code of the City of New York and be subject to the civil penalties for violations that are not timely corrected provided for by Section 27-2115(a) of said Code, and other applicable laws and regulations;
- k) **IMPOSING** upon Respondents the civil penalties provided by Sections 27-2115 and 28-202 of the Administrative Code of the City of New York based upon Respondents' violations of the Housing Maintenance Code as well as Respondents not timely correcting said violations, and other applicable laws; and **ENTERING** a judgment against the Respondents for the amount of civil penalties imposed by the Court;
- l) **DIRECTING** the immediate restoration of all essential services defined in the Housing Maintenance Code as "heat, hot water, cold water, electricity, gas, maintenance and janitorial services, and any other services that the commissioner determines by rule to be essential";
- m) **DIRECTING** the immediate payment of all utility bills and/or monies owed by Respondents to Con Edison that are required to maintain essential services as defined in the Housing Maintenance Code;
- n) **ENJOINING** Respondents from permitting said violations to exist and from permitting any new conditions during the pendency of this proceeding to exist which endanger the life, health, and safety of Petitioners and their families;
- o) **AWARDING** Petitioners' costs, disbursements, and attorneys' fees for this proceeding, including relocation costs as needed; and
- p) **GRANTING** such other and further relief as may seem just and proper.

Dated: Bronx, New York
May 2, 2022

By:  _____

Thomas Licharson, Esq.
Bronx Legal Services

369 East 148th Street, 2nd Floor
Bronx, NY 10455
TEL: 718-928-3703
Fax: 646-859-8736
tlicharson@lsnyc.org

Counsel for Petitioners

VERIFICATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

Margaret Adarkwa, being duly sworn, deposes and says:

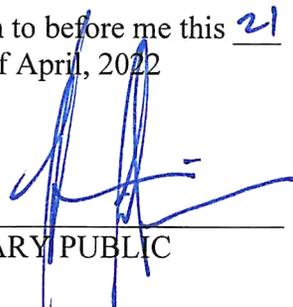
1. I reside at 1187 Anderson Avenue, Apartment 3A, in Bronx County.
2. I am a Petitioner in the above-captioned proceeding.
3. I have read the within Verified Petition and affirm that the facts stated therein are true to the best of my knowledge as it pertains to conditions in my individual apartment and to building-wide conditions. As to those matters stated on information and belief, I have reason to believe they are true.

Dated: April 21, 2022
Bronx, New York



Margaret Adarkwa

Sworn to before me this 21
Day of April, 2022



NOTARY PUBLIC

THOMAS AP LICHARSON
Notary Public State of New York
No. 02LI6429925
Qualified in New York County
Commission Expires March 7, 2026

VERIFICATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

Aaron Asiedu, being duly sworn, deposes and says:

1. I reside at 1187 Anderson Avenue, Apartment 6C, in Bronx County.
2. I am a Petitioner in the above-captioned proceeding.
3. I have read the within Verified Petition and affirm that the facts stated therein are true to the best of my knowledge as it pertains to conditions in my individual apartment and to building-wide conditions. As to those matters stated on information and belief, I have reason to believe they are true.

Dated: April 14, 2022
Bronx, New York



Aaron Asiedu

Sworn to before me this 14th
Day of April, 2022



NOTARY PUBLIC

GABRIELLA M. BETANCES
Notary Public State of New York
No. 01BE6390454
Qualified in New York County
Commission Expires April 15, 2023

VERIFICATION

STATE OF NEW YORK)
 :
COUNTY OF BRONX) ss.

Shanil Baez, being duly sworn, deposes and says:

1. I reside at 1187 Anderson Avenue, Apartment 1F, in Bronx County.
2. I am a Petitioner in the above-captioned proceeding.
3. I have read the within Verified Petition and affirm that the facts stated therein are true to the best of my knowledge as it pertains to conditions in my individual apartment and to building-wide conditions. As to those matters stated on information and belief, I have reason to believe they are true.

Dated: April 21, 2022
Bronx, New York

Shanil Baez
Shanil Baez

Sworn to before me this 21st
Day of April, 2022

Gabriella M. Betances
NOTARY PUBLIC

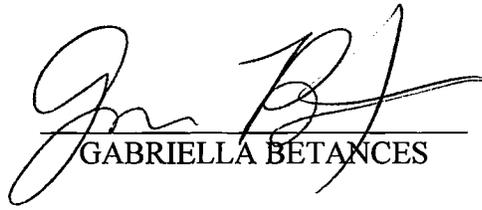
GABRIELLA M. BETANCES
Notary Public State of New York
No. 01BE6390454
Qualified in New York County
Commission Expires April 15, 2023

AFFIDAVIT OF TRANSLATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

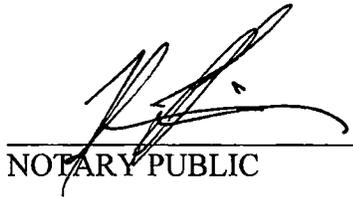
Gabriella Betances, being duly sworn, deposes and says:

1. I am over eighteen years of age and am not a party to this action.
2. I am fluent in both the Spanish and English languages.
3. On April 21, 2022, I interpreted the within Verified Petition of Shanil Baez and Shanil Baez indicated to me that they understood its meaning before affixing their signature thereto.



GABRIELLA BETANCES

Sworn to before me this
26th day of April, 2022



NOTARY PUBLIC

THOMAS AP LICHARSON
Notary Public State of New York
No. 02Li6429925
Qualified in New York County
Commission Expires March 7, 2026

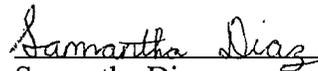
VERIFICATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

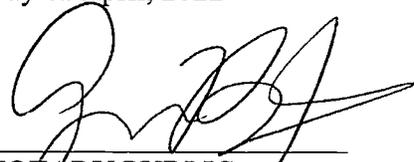
Samantha Diaz, being duly sworn, deposes and says:

1. I reside at 1187 Anderson Avenue, Apartment 2C, in Bronx County.
2. I am a Petitioner in the above-captioned proceeding.
3. I have read the within Verified Petition and affirm that the facts stated therein are true to the best of my knowledge as it pertains to conditions in my individual apartment and to building-wide conditions. As to those matters stated on information and belief, I have reason to believe they are true.

Dated: April 14, 2022
Bronx, New York


Samantha Diaz

Sworn to before me this 14th
Day of April, 2022



NOTARY PUBLIC

GABRIELLA M. BETANCES
Notary Public State of New York
No. 01BE6390454
Qualified in New York County
Commission Expires April 15, 2023

VERIFICATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

Marielucile Dorvil, being duly sworn, deposes and says:

1. I reside at 1187 Anderson Avenue, Apartment 4B, in Bronx County.
2. I am a Petitioner in the above-captioned proceeding.
3. I have read the within Verified Petition and affirm that the facts stated therein are true to the best of my knowledge as it pertains to conditions in my individual apartment and to building-wide conditions. As to those matters stated on information and belief, I have reason to believe they are true.

Dated: April 21, 2022
Bronx, New York



Marielucile Dorvil

Sworn to before me this 21st
Day of April, 2022



NOTARY PUBLIC

GABRIELLA M. BETANCES
Notary Public State of New York
No. 01BE6390454
Qualified in New York County
Commission Expires April 15, 2023

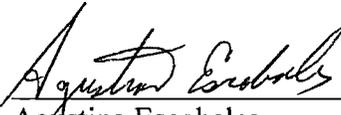
VERIFICATION

STATE OF NEW YORK)
 :
) SS.
COUNTY OF BRONX)

Agustina Escobales, being duly sworn, deposes and says:

1. I reside at 1187 Anderson Avenue, Apartment 6F, in Bronx County.
2. I am a Petitioner in the above-captioned proceeding.
3. I have read the within Verified Petition and affirm that the facts stated therein are true to the best of my knowledge as it pertains to conditions in my individual apartment and to building-wide conditions. As to those matters stated on information and belief, I have reason to believe they are true.

Dated: April 14, 2022
Bronx, New York



Agustina Escobales

Sworn to before me this 14th
Day of April, 2022



NOTARY PUBLIC

GABRIELLA M. BETANCES
Notary Public State of New York
No. 01BE6390454
Qualified in New York County
Commission Expires April 15, 2023

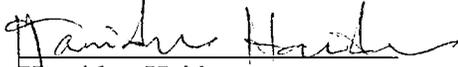
VERIFICATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

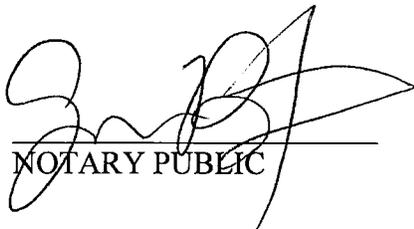
Hamidou Haidara, being duly sworn, deposes and says:

1. I reside at 1187 Anderson Avenue, Apartment 4E, in Bronx County.
2. I am a Petitioner in the above-captioned proceeding.
3. I have read the within Verified Petition and affirm that the facts stated therein are true to the best of my knowledge as it pertains to conditions in my individual apartment and to building-wide conditions. As to those matters stated on information and belief, I have reason to believe they are true.

Dated: April 14, 2022
Bronx, New York


Hamidou Haidara

Sworn to before me this 14th
Day of April, 2022


NOTARY PUBLIC

GABRIELLA M. BETANCES
Notary Public State of New York
No. 01BE6390454
Qualified In New York County
Commission Expires April 15, 2023

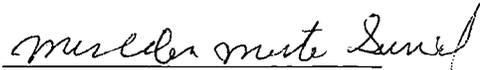
VERIFICATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

Mercedes Marte, being duly sworn, deposes and says:

1. I reside at 1187 Anderson Avenue, Apartment 2B, in Bronx County.
2. I am a Petitioner in the above-captioned proceeding.
3. I have read the within Verified Petition and affirm that the facts stated therein are true to the best of my knowledge as it pertains to conditions in my individual apartment and to building-wide conditions. As to those matters stated on information and belief, I have reason to believe they are true.

Dated: April 14, 2022
Bronx, New York


Mercedes Marte

Sworn to before me this 14th
Day of April, 2022


NOTARY PUBLIC

GABRIELLA M. BETANCES
Notary Public State of New York
No. 01BE6390454
Qualified in New York County
Commission Expires April 15, 2023

AFFIDAVIT OF TRANSLATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

Gabriella Betances, being duly sworn, deposes and says:

1. I am over eighteen years of age and am not a party to this action.
2. I am fluent in both the Spanish and English languages.
3. On April 14, 2022, I interpreted the within Verified Petition of Mercedes Marte and Mercedes Marte indicated to me that they understood its meaning before affixing their signature thereto.



GABRIELLA BETANCES

Sworn to before me this
26th day of April, 2022



NOTARY PUBLIC

THOMAS AP LICHARSON
Notary Public State of New York
No. 02LI6429925
Qualified in New York County
Commission Expires March 7, 2026

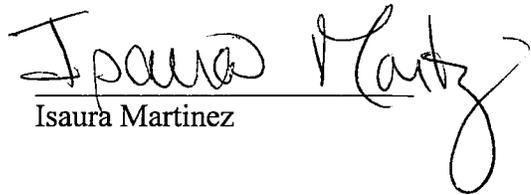
VERIFICATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

Isaura Martinez, being duly sworn, deposes and says:

1. I reside at 1187 Anderson Avenue, Apartment 3D, in Bronx County.
2. I am a Petitioner in the above-captioned proceeding.
3. I have read the within Verified Petition and affirm that the facts stated therein are true to the best of my knowledge as it pertains to conditions in my individual apartment and to building-wide conditions. As to those matters stated on information and belief, I have reason to believe they are true.

Dated: April 14, 2022
Bronx, New York


Isaura Martinez

Sworn to before me this 14th
Day of April, 2022


NOTARY PUBLIC

GABRIELLA M. BETANCES
Notary Public State of New York
No. 01BE6390454
Qualified In New York County
Commission Expires April 15, 2023

AFFIDAVIT OF TRANSLATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

Gabriella Betances, being duly sworn, deposes and says:

1. I am over eighteen years of age and am not a party to this action.
2. I am fluent in both the Spanish and English languages.
3. On April 14, 2022, I interpreted the within Verified Petition of Isaura Martinez and Isaura Martinez indicated to me that they understood its meaning before affixing their signature thereto.



GABRIELLA BETANCES

Sworn to before me this
26th day of April, 2022



NOTARY PUBLIC
THOMAS AP LICHARSON
Notary Public State of New York
No. 02LI6429925
Qualified in New York County
Commission Expires March 7, 2026

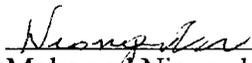
VERIFICATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

Mohamed Niangadou, being duly sworn, deposes and says:

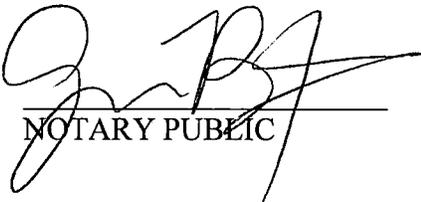
1. I reside at 1187 Anderson Avenue, Apartment 4A, in Bronx County.
2. I am a Petitioner in the above-captioned proceeding.
3. I have read the within Verified Petition and affirm that the facts stated therein are true to the best of my knowledge as it pertains to conditions in my individual apartment and to building-wide conditions. As to those matters stated on information and belief, I have reason to believe they are true.

Dated: April 14, 2022
Bronx, New York



Mohamed Niangadou

Sworn to before me this 14th
Day of April, 2022



NOTARY PUBLIC

GABRIELLA M. BETANCES
Notary Public State of New York
No. 01BE6390454
Qualified in New York County
Commission Expires April 15, 2023

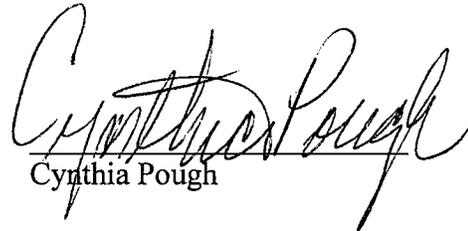
VERIFICATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

Cynthia Pough, being duly sworn, deposes and says:

1. I reside at 1187 Anderson Avenue, Apartment 4F, in Bronx County.
2. I am a Petitioner in the above-captioned proceeding.
3. I have read the within Verified Petition and affirm that the facts stated therein are true to the best of my knowledge as it pertains to conditions in my individual apartment and to building-wide conditions. As to those matters stated on information and belief, I have reason to believe they are true.

Dated: April 14, 2022
Bronx, New York



Cynthia Pough

Sworn to before me this 14th
Day of April, 2022



NOTARY PUBLIC

GABRIELLA M. BETANCES
 Notary Public State of New York
 No. 01BE6390454
 Qualified in New York County
 Commission Expires April 15, 2023

VERIFICATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

Digna Ramirez, being duly sworn, deposes and says:

1. I reside at 1187 Anderson Avenue, Apartment 6B, in Bronx County.
2. I am a Petitioner in the above-captioned proceeding.
3. I have read the within Verified Petition and affirm that the facts stated therein are true to the best of my knowledge as it pertains to conditions in my individual apartment and to building-wide conditions. As to those matters stated on information and belief, I have reason to believe they are true.

Dated: April 14, 2022
Bronx, New York

Digna Ramirez
Digna Ramirez

Sworn to before me this 14th
Day of April, 2022

[Signature]
NOTARY PUBLIC

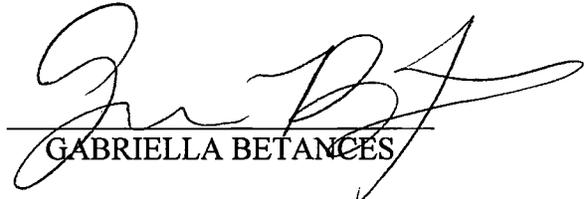
GABRIELLA M. BETANCES
Notary Public State of New York
No. 01BE6390454
Qualified in New York County 23
Commission Expires April 15, 2023

AFFIDAVIT OF TRANSLATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

Gabriella Betances, being duly sworn, deposes and says:

1. I am over eighteen years of age and am not a party to this action.
2. I am fluent in both the Spanish and English languages.
3. On April 14, 2022, I interpreted the within Verified Petition of Digna Ramirez and Digna Ramirez indicated to me that they understood its meaning before affixing their signature thereto.



GABRIELLA BETANCES

Sworn to before me this
26th day of April, 2022



NOTARY PUBLIC

THOMAS AP LICHARSON
Notary Public State of New York
No. 02L16429925
Qualified in New York County
Commission Expires March 7, 2026

VERIFICATION

STATE OF NEW YORK)
 : ss.
COUNTY OF BRONX)

Arisleyda Reynoso, being duly sworn, deposes and says:

1. I reside at 1187 Anderson Avenue, Apartment 5E, in Bronx County.
2. I am a Petitioner in the above-captioned proceeding.
3. I have read the within Verified Petition and affirm that the facts stated therein are true to the best of my knowledge as it pertains to conditions in my individual apartment and to building-wide conditions. As to those matters stated on information and belief, I have reason to believe they are true.

Dated: April 21, 2022
Bronx, New York



Arisleyda Reynoso

Sworn to before me this 21st
Day of April, 2022



NOTARY PUBLIC

GABRIELLA M. BETANCES
Notary Public State of New York
No. 01BE6390454
Qualified in New York County
Commission Expires April 15, 2023

AFFIDAVIT OF TRANSLATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

Gabriella Betances, being duly sworn, deposes and says:

1. I am over eighteen years of age and am not a party to this action.
2. I am fluent in both the Spanish and English languages.
3. On April 21, 2022, I interpreted the within Verified Petition of Arisleyda Reynoso and Arisleyda Reynoso indicated to me that they understood its meaning before affixing their signature thereto.



GABRIELLA BETANCES

Sworn to before me this
26th day of April, 2022



NOTARY PUBLIC

THOMAS AP LICHARSON
Notary Public State of New York
No. 02LI6429925
Qualified in New York County
Commission Expires March 7, 2026

VERIFICATION

STATE OF NEW YORK)
 :
COUNTY OF BRONX) ss.

Evelin de la Rosa, being duly sworn, deposes and says:

1. I reside at 1187 Anderson Avenue, Apartment B2, in Bronx County.
2. I am a Petitioner in the above-captioned proceeding.
3. I have read the within Verified Petition and affirm that the facts stated therein are true to the best of my knowledge as it pertains to conditions in my individual apartment and to building-wide conditions. As to those matters stated on information and belief, I have reason to believe they are true.

Dated: April 21, 2022
Bronx, New York



Evelin de la Rosa

Sworn to before me this 21st
Day of April, 2022



NOTARY PUBLIC

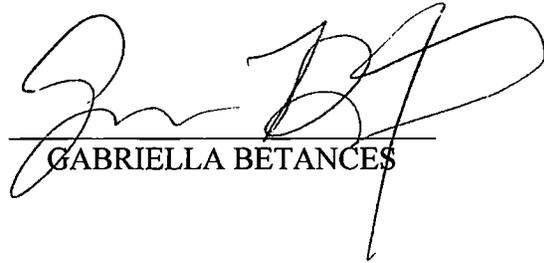
GABRIELLA M. BETANCES
Notary Public State of New York
No. 01BE6390454
Qualified in New York County
Commission Expires April 15, 2023

AFFIDAVIT OF TRANSLATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

Gabriella Betances, being duly sworn, deposes and says:

1. I am over eighteen years of age and am not a party to this action.
2. I am fluent in both the Spanish and English languages.
3. On April 21, 2022, I interpreted the within Verified Petition of Evelin de la Rosa and Evelin de la Rosa indicated to me that they understood its meaning before affixing their signature thereto.



GABRIELLA BETANCES

Sworn to before me this
26th day of April, 2022



NOTARY PUBLIC
THOMAS AP LICHARSON
Notary Public State of New York
No. 02LI6429925
Qualified in New York County
Commission Expires March 7, 2026

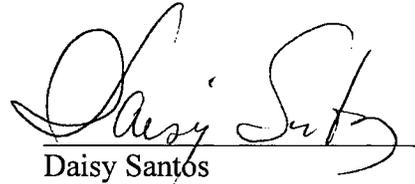
VERIFICATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

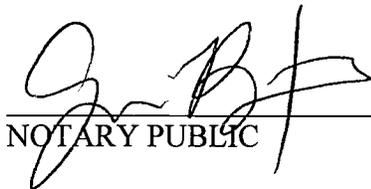
Daisy Santos, being duly sworn, deposes and says:

1. I reside at 1187 Anderson Avenue, Apartment 2A, in Bronx County.
2. I am a Petitioner in the above-captioned proceeding.
3. I have read the within Verified Petition and affirm that the facts stated therein are true to the best of my knowledge as it pertains to conditions in my individual apartment and to building-wide conditions. As to those matters stated on information and belief, I have reason to believe they are true.

Dated: April 21, 2022
Bronx, New York


Daisy Santos

Sworn to before me this 21st
Day of April, 2022


NOTARY PUBLIC

GABRIELLA M. BETANCES
Notary Public State of New York
No. 01BE6390454
Qualified in New York County
Commission Expires April 15, 2023

AFFIDAVIT OF TRANSLATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

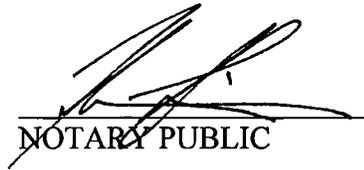
Gabriella Betances, being duly sworn, deposes and says:

1. I am over eighteen years of age and am not a party to this action.
2. I am fluent in both the Spanish and English languages.
3. On April 21, 2022, I interpreted the within Verified Petition of Daisy Santos and Daisy Santos indicated to me that they understood its meaning before affixing their signature thereto.



GABRIELLA BETANCES

Sworn to before me this
26th day of April, 2022



NOTARY PUBLIC

THOMAS A. LICHARSON
Notary Public State of New York
No. 02LI0420026
Qualified in New York County
Commission Expires March 7, 2026

VERIFICATION

STATE OF NEW YORK)
 :
COUNTY OF BRONX) ss.

Ibrahim Sidibe, being duly sworn, deposes and says:

1. I reside at 1187 Anderson Avenue, Apartment 6A, in Bronx County.
2. I am a Petitioner in the above-captioned proceeding.
3. I have read the within Verified Petition and affirm that the facts stated therein are true to the best of my knowledge as it pertains to conditions in my individual apartment and to building-wide conditions. As to those matters stated on information and belief, I have reason to believe they are true.

Dated: April 21, 2022
Bronx, New York



Ibrahim Sidibe

Sworn to before me this 21st
Day of April, 2022



NOTARY PUBLIC

THOMAS AP LICHARSON
Notary Public State of New York
No. 02LI6429925
Qualified in New York County
Commission Expires March 7, 2026

VERIFICATION

STATE OF NEW YORK)
 :
) ss.
COUNTY OF BRONX)

Oumarou Traore, being duly sworn, deposes and says:

1. I reside at 1187 Anderson Avenue, Apartment 6E, in Bronx County.
2. I am a Petitioner in the above-captioned proceeding.
3. I have read the within Verified Petition and affirm that the facts stated therein are true to the best of my knowledge as it pertains to conditions in my individual apartment and to building-wide conditions. As to those matters stated on information and belief, I have reason to believe they are true.

Dated: April 21, 2022
Bronx, New York



Oumarou Traore

Sworn to before me this 21st
Day of April, 2022



NOTARY PUBLIC

THOMAS AP LICHARSON
Notary Public State of New York
No. 02LI6429925
Qualified in New York County
Commission Expires March 7, 2026

Exhibit A

(HPD Violations)

HPD Building, Registration & Violation Services [Home](#)

The selected address: **1187 ANDERSON AVENUE, Bronx 10452**

This building has filed records with the New York State Division of Housing and Community Renewal at least one time from 1993 to the present year and may contain one or more regulated apartments.

HPD#	Range	Block	Lot	CD	CensusTract	Stories	A Units	B Units	Ownership	Registration#	Class	
806244	Active	1187-1187	02510	0040	4	19900	6	37	0	PVT	210437	B

Other Units

Property Owner Registration Information

Charges

Complaint Status

Complaint History

Litigation/Case Status

Tenant Harassment Report

All Open Violations

prior year Open Viol.'s

Ecertainment

Overdue Lead Paint Viol. Correction

Vacate Orders

I-Card Images

PROS Online

Bed Bugs

Map

Building Registration Summary Report

Find Apartment#

Owner	Last Reg Dt Reg Expire Dt	Organization	Last Nm	First Nm	House No	Street Nm	Apt	City	State	Zip
Head Officer	09/30/2021 09/01/2022		BRETON	FRANCISCO	1820	SWARTHMORE AVE	499	LAKEWOOD	NJ	08701
Corporation	09/30/2021 09/01/2022	ANDERSON A LLC			1820	SWARTHMORE AVE	499	LAKEWOOD	NJ	08701
Managing Agent	09/30/2021 09/01/2022		BRETON	FRANCISCO	2483	CAMBRELENG AVE	LL	Bronx	NY	10458

Open Violations - ALL DATES

There are 66 Violations. Arranged by category: A class: 18 B class: 37 C class: 11 I class: 0

For Definitions of the columns indicated below, select glossary under the Services option (located at the upper right).

To sort the columns, click on their underlined headers below in the blue area.

<u>Apt Story</u>	<u>Reported Date, nov ISSUED Date</u>	<u>Hzrd Class no</u>	<u>Order</u>	<u>Violation ID, NOV ID, NOV Type</u>	<u>Violation Description</u>	<u>Status Status Date</u>	<u>Certify By Date Actual Cert. Date</u>
4B 4	2022/04/18 2022/04/21	B	579	15110042 7883900	§ 27-2026 adm code repair the leaky and/or defective faucets at sink in the kitchen located at apt 4b, 4th story, 1st apartment from north at east	NOV SENT 2022/04/21	2022/06/09
4B 4	2022/04/18 2022/04/21	B	501	15110043 7883900	§ 27-2005 adm code properly repair the broken or defective intercom buzzer system from building entrance to apt. located at apt 4b, 4th story, 1st apartment from north at east	NOV SENT 2022/04/21	2022/06/09
4B 4	2022/04/18 2022/04/21	A	501	15110044 7883899	§ 27-2005 adm code properly repair the broken or defective door bell at entrance located at apt 4b, 4th story, 1st apartment from north at east	NOV SENT 2022/04/21	2022/08/08
1	2022/04/18 2022/04/21	B	501	15110046 7883901	§ 27-2005 adm code properly repair the broken or defective key operated lock and assembly at building entrance door , 1st story	NOV SENT 2022/04/21	2022/06/09
1	2022/04/18 2022/04/21	C	505	15110047 7883902	§ 27-2005 adm code replace with new the broken or defective glass pane at building entrance door , 1st story	NOV SENT 2022/04/21	2022/05/04
4B 4	2022/02/24 2022/02/25	B	583	14886825 7732482	§ 27-2026, 2027 hmc: properly repair the source and abate the evidence of a water leak at celing in the bathroom located at apt 4b, 4th story, 1st apartment from north at east	NOV SENT 2022/02/25	2022/04/15
4B 4	2022/02/24 2022/02/25	B	508	14886826 7732482	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling and south wall in the bathroom located at apt 4b, 4th story, 1st apartment from north at east	NOV SENT 2022/02/25	2022/04/15
4B 4	2022/02/24 2022/02/25	B	502	14886827 7732482	§ 27-2005 adm code properly repair with similar material the broken or defective porcelain enamel glaze surface on the bathtub in the bathroom located at apt 4b, 4th story, 1st apartment from north at east	NOV SENT 2022/02/25	2022/04/15

4B 4	2022/02/24 B 2022/02/25	501	14886828 7732482 Original	§ 27-2005 adm code properly repair the broken or defective bell/buzzer system from building entrance to apartment located at apt 4b, 4th story, 1st apartment from north at east	NOV SENT 2022/02/25	2022/04/15
3A 3	2021/10/14 B 2021/10/22	550	14639161 7522667 Original	§ 27-2017.3 hmc: trace and repair the source and abate the visible mold condition... 18 sq ft in the bathroom located at apt 3a, 3rd story, 2nd apartment from north at east	CERT INVALID 2021/12/10	2021/12/10
Yards / Courts	2021/09/26 C 2021/09/30	502	14597571 7496744 Original	§ 27-2005 adm code properly repair with similar material the broken or defective concrete tread, 1st up from bottom at 2nd landing at stoop at east at stoop	CIV10 MAILED 2021/11/10	2021/10/13 2021/10/12
2F 2	2021/09/24 B 2021/09/27	501	14587777 7492386 Original	§ 27-2005 adm code properly repair the broken or defective intercom system from the apartment to the building entrance intercom panel located at apt 2f, 2nd story, 1st apartment from west at north	NOT COMPLIED 2021/11/09	2021/11/15
2F 2	2021/09/24 B 2021/09/27	501	14587793 7492386 Original	§ 27-2005 adm code properly repair the broken or defective wood sink base cabinet in the kitchen located at apt 2f, 2nd story, 1st apartment from west at north	NOT COMPLIED 2021/11/09	2021/11/15
2F 2	2021/09/24 B 2021/09/27	502	14587796 7492386 Original	§ 27-2005 adm code properly repair with similar material the broken or defective grout around bathtub in the bathroom located at apt 2f, 2nd story, 1st apartment from west at north	NOT COMPLIED 2021/11/09	2021/11/15
6B 6	2021/09/20 B 2021/09/22	501	14572913 7485982 Original	§ 27-2005 adm code properly repair the broken or defective mechanical ventilation system at north wall in the bathroom located at apt 6b, 6th story, 1st apartment from north at east , section at north	NOT COMPLIED 2021/11/09	2021/11/10
5A 5	2021/09/03 B 2021/09/13	502	14551638 7474090 Original	§ 27-2005 adm code properly repair with similar material the broken or defective reglaze porcelain bath tub in the bathroom located at apt 5a, 5th story, 2nd apartment from west at north	NOT COMPLIED 2021/11/09	2021/11/01
6F 6	2021/09/03 B 2021/09/10	508	14551633 7470825 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at south wall in the foyer located at apt 6f, 6th story, 1st apartment from west at north	NOT COMPLIED 2021/11/09	2021/10/29
All Stories	2021/07/08 A 2021/07/14	561	14435952 7406478 Original	§ 27-2014 adm code and dept. rules and regulations. scrape and remove rust scales and paint with 2 coats of paint at all stories at building front at fire escape	CIV10 MAILED 2021/11/10	2021/10/31 2021/09/02
4D 4	2021/07/07 A 2021/07/08	556	14427766 7400757 Original	§ 27-2013 adm code paint with light colored paint to the satisfaction of this department east wall in the 1st room from east located at apt 4d, 4th story, 1st apartment from east at south	NOT COMPLIED 2021/11/09	2021/10/25 2021/08/18
4D 4	2021/07/07 A 2021/07/08	556	14427768 7400757 Original	§ 27-2013 adm code paint with light colored paint to the satisfaction of this department north wall in the 2nd room from east located at apt 4d, 4th story, 1st apartment from east at south	NOT COMPLIED 2021/11/09	2021/10/25 2021/08/18
2D 2	2021/05/18 B 2021/05/20	583	14348284 7353022 Original	§ 27-2026, 2027 hmc: properly repair the source and abate the evidence of a water leak ceiling in the 3rd room from east located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/07/08
2D 2	2021/05/18 B 2021/05/20	508	14348285 7353022 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color ceiling in the 3rd room from east located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/07/08
2D 2	2021/05/18 B 2021/05/20	583	14348288 7353022 Original	§ 27-2026, 2027 hmc: properly repair the source and abate the evidence of a water leak ceiling in the bathroom located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/07/08
2D 2	2021/05/18 B 2021/05/20	508	14348291 7353022 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color ceiling in the bathroom located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/07/08
2D 2	2021/03/03 A 2021/05/05	556	14321383 7337965 Original	§ 27-2013 adm code paint with light colored paint to the satisfaction of this department the ceiling in the bathroom located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/08/22
2D 2	2021/04/20 A 2021/04/23	502	14287837 7327219 Original	§ 27-2005 adm code properly repair with similar material the broken or defective cracking wood floor in the kitchen located at apt 2d, 2nd story, 1st apartment from west at north	1 NO ACCESS 2021/11/16	2021/08/10
2D 2	2021/04/20 C 2021/04/23	568	14287863 7327221 Original	hmc adm code: § 27-2017.4 abate the infestation consisting of roaches in the entire apartment located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/05/24
2D 2	2021/04/20 A 2021/04/23	508	14287868 7327219 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling in the bathroom located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/08/10

2D 2	2021/04/20 A 2021/04/23	556	14287874 7327219 Original	§ 27-2013 adm code paint with light colored paint to the satisfaction of this department at ceiling and west wall in the kitchen located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/08/10
2D 2	2021/04/20 A 2021/04/23	501	14287878 7327219 Original	§ 27-2005 adm code properly repair the broken or defective spring balance at upper sash window in the 1st room from north located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/08/10
2D 2	2021/04/20 A 2021/04/23	501	14287904 7327219 Original	§ 27-2005 adm code properly repair the broken or defective light switch at west wall in the 1st room from north located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/08/10
2D 2	2021/04/20 A 2021/04/23	501	14287905 7327219 Original	§ 27-2005 adm code properly repair the broken or defective electrical outlet at west wall in the 1st room from north located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/08/10
2D 2	2021/04/19 B 2021/04/21	583	14276803 7310014 Original	§ 27-2026, 2027 hmc: properly repair the source and abate the evidence of a water leak at ceiling in the 1st room from north at east located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/06/09
2D 2	2021/04/19 B 2021/04/21	508	14276804 7310014 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling in the 1st room from north at east located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/06/09
2D 2	2021/04/19 B 2021/04/21	1503	14276810 7310014 Original	§ 27-2046.1 hmc: repair or replace the carbon monoxide detecting device(s). defective in the entire apartment located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/06/09
2D 2	2021/04/19 B 2021/04/21	702	14276811 7310014 Original	§ 27-2045 adm code repair or replace the smoke detector defective in the entire apartment located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/06/09
2D 2	2021/03/03 C 2021/03/15	616	14073410 7119508 Original	§ 27-2056.6 adm code - correct the lead-based paint hazard - presumed lead paint that is peeling or on a deteriorated subsurface using work practices set forth in 28 rcny §11-06(b)(2) ceiling in the 3rd room from east at south located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/04/13
4D 4	2021/03/03 A 2021/03/08	556	14060438 7111777 Original	§ 27-2013 adm code paint with light colored paint to the satisfaction of this department at ceiling and all walls in the entire apartment located at apt 4d, 4th story, 1st apartment from east at south	NOT COMPLIED 2021/11/09	2021/06/25
6C 6	2021/03/03 A 2021/03/08	556	14060485 7111778 Original	§ 27-2013 adm code paint with light colored paint to the satisfaction of this department at ceiling and all walls in the kitchen located at apt 6c, 6th story, 2nd apartment from north at east	NOT COMPLIED 2021/11/16	2021/06/25
2D 2	2021/03/03 C 2021/03/08	568	14060516 7111787 Original	hmc adm code: § 27-2017.4 abate the infestation consisting of roaches in the entire apartment located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/04/08 2021/04/07
2D 2	2021/03/03 B 2021/03/08	508	14060519 7111782 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling in the bathroom located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/04/26
2D 2	2021/03/03 B 2021/03/08	508	14060521 7111782 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling in the 3rd room from east at south located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/04/26
2D 2	2021/03/03 A 2021/03/08	556	14060522 7111779 Original	§ 27-2013 adm code paint with light colored paint to the satisfaction of this department at ceiling and all walls in the kitchen located at apt 2d, 2nd story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2021/06/25
CA 1	2021/01/22 C 2021/01/27	583	14003318 7074778 Original	§ 27-2026, 2027 hmc: properly repair the source and abate the evidence of a water leak at ceiling in the foyer located at apt ca, 1st story, 1st apartment from west at north	1 NO ACCESS 2021/11/16	2021/02/09
CA 1	2021/01/22 B 2021/01/27	508	14003321 7074777 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color ceiling in the foyer located at apt ca, 1st story, 1st apartment from west at north	1 NO ACCESS 2021/11/16	2021/03/17
CA 1	2021/01/22 C 2021/01/27	569	14003332 7074779 Original	hmc adm code: § 27-2017.4 abate the infestation consisting of mice in the entire apartment located at apt ca, 1st story, 1st apartment from west at north	1 NO ACCESS 2021/11/16	2021/02/27
3D 3	2021/01/16 B 2021/01/19	550	13988063 7067009 Original	§ 27-2017.3 hmc: trace and repair the source and abate the visible mold condition... at the ceiling approx 2 sq ft in the bathroom located at apt 3d, 3rd story, 1st apartment from west at north ,	DEFECT LETTER 2021/11/16	2021/03/09

				section "bldg #1191" original violation 13811168 issued 13-sep-20 has been upgraded to class b per administrative code §27-2017.3a(3)(a) or (b).		
CA Basement	2021/01/09 B 2021/01/11	702	13978112 7059456 Original	§ 27-2045 adm code repair or replace the smoke detector defective in the entire apartment located at bsmt-apt ca, 1st bsmt-apt from east at south , section "bld 1191"	1 NO ACCESS 2021/11/16	2021/03/01
CA Basement	2021/01/09 B 2021/01/11	1503	13978113 7059456 Original	§ 27-2046.1 hmc: repair or replace the carbon monoxide detecting device(s). defective in the entire apartment located at bsmt-apt ca, 1st bsmt-apt from east at south , section "bld 1191"	1 NO ACCESS 2021/11/16	2021/03/01
6C 6	2020/11/09 B 2020/11/12	508	13887458 7004155 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color ceilings and all walls in the entire apartment located at apt 6c, 6th story, 2nd apartment from north at east	NOT COMPLIED 2021/11/16	2020/12/31
6E 6	2020/11/09 A 2020/11/12	501	13887552 7004154 Original	§ 27-2005 adm code properly repair the broken or defective base cabinet at sink in the kitchen located at apt 6e, 6th story, 2nd apartment from north at east , section "1191"	NOT COMPLIED 2021/11/16	2021/03/01
6E 6	2020/11/09 A 2020/11/12	529	13887556 7004154 Original	§ 27-2005 adm code refit doors at base cabinet in the kitchen located at apt 6e, 6th story, 2nd apartment from north at east , section "1191"	NOT COMPLIED 2021/11/16	2021/03/01
6E 6	2020/11/09 B 2020/11/12	508	13887573 7004156 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color ceilings and all walls in the entire apartment located at apt 6e, 6th story, 2nd apartment from north at east , section "1191"	NOT COMPLIED 2021/11/16	2020/12/31
6E 6	2020/11/09 A 2020/11/12	508	13887597 7004154 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color west wall below sink in the kitchen located at apt 6e, 6th story, 2nd apartment from north at east , section "1191"	NOT COMPLIED 2021/11/16	2021/03/01
3D 3	2020/10/29 C 2020/10/30	550	13873784 6994042 Original	§ 27-2017.3 hmc: trace and repair the source and abate the visible mold condition... 8 square feet at the north wall, 8 square feet at the east wall, 8 square feet at the southwall, 8 square feet at the westwall, and 8sq ft at ceiling in the bathroom located at apt 3d, 3rd story, 1st apartment from north at east , section "1191", 1st from south at west	DEFECT LETTER 2021/11/16	2020/11/30
CA. 1	2020/09/02 B 2020/09/09	702	13798155 6951551 Original	§ 27-2045 adm code repair or replace the smoke detector defective in the entire apartment located at apt ca., 1st story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2020/10/28
CA. 1	2020/09/02 B 2020/09/09	1503	13798204 6951551 Original	§ 27-2046.1 hmc: repair or replace the carbon monoxide detecting device(s). defective in the entire apartment located at apt ca., 1st story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2020/10/28
CA. 1	2020/09/02 B 2020/09/09	579	13803566 6951551 Original	§ 27-2026 adm code repair the leaky and/or defective faucets at sink in the kitchen located at apt ca., 1st story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2020/10/28
CA. 1	2020/09/02 B 2020/09/09	508	13803571 6951551 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color the ceiling in the private hallway located at apt ca., 1st story, 1st apartment from east at south	1 NO ACCESS 2021/11/16	2020/10/28
5F 5	2020/01/14 B 2020/01/14	550	13548099 6792097 Original	§ 27-2017.3 hmc: trace and repair the source and abate the visible mold condition... at ceiling appr. 1 sq ft in the bathroom located at apt 5f, 5th story, 1st apartment from west at north original violation 13281781 issued 14-sep-19 has been upgraded to class b per administrative code §27-2017.3a(3)(a) or (b).	DEFECT LETTER 2021/11/16	2020/03/03
4A 4	2019/11/20 C 2019/11/25	568	13465782 6741077 Original	hmc adm code: § 27-2017.4 abate the infestation consisting of roaches in the entire apartment located at apt 4a, 4th story, 1st apartment from west at north	NOT COMPLIED 2021/11/09	2019/12/21
4A 4	2019/11/20 C 2019/11/25	569	13465784 6741077 Original	hmc adm code: § 27-2017.4 abate the infestation consisting of mice in the entire apartment located at apt 4a, 4th story, 1st apartment from west at north	NOT COMPLIED 2021/11/09	2019/12/21
5F 6	2018/09/07 B 2018/09/11	550	12569641 6188661 Original	§ 27-2005 hmc:trace and repair the source and abate the nuisance consisting of mold ... at ceiling (approx 1 sq ft) in the bathroom located at apt 5f, 6th story, 1st apartment from north at east	DEFECT LETTER 2021/11/16	2018/10/30
5F 6	2018/09/07 B 2018/09/11	550	12569652 6188661 Original	§ 27-2005 hmc:trace and repair the source and abate the nuisance consisting of mold ... at ceiling (approx 1 sq ft) in the 2nd room from east located at apt 5f, 6th story, 1st apartment from north at east	DEFECT LETTER 2021/11/16	2018/10/30

4/28/22 4:58 PM
NYSCEF DOC. NO. 1

HPD Building Info

RECEIVED NYSCEF: 05/02/2022

5F	2018/08/30 C	550	12559585	§ 27-2005 hmc:trace and repair the source and	DEFECT	2018/09/17
5	2018/09/04		6181525	abate the nuisance consisting of mold ... ceiling	LETTER	2018/10/17
			Original	approx. 30 square feet. in the 3rd room from north		2021/11/16
				located at apt 5f, 5th story, 1st apartment from		
				west at north		
Fire	2018/08/30 A	561	12559619	§ 27-2014 adm code and dept. rules and	NOT	2018/12/22
Escape	2018/09/04		6181522	regulations. scrape and remove rust scales and	COMPLIED	
			Original	paint with 2 coats of paint fire escape at south side		2021/11/09
				of building, all stories.		



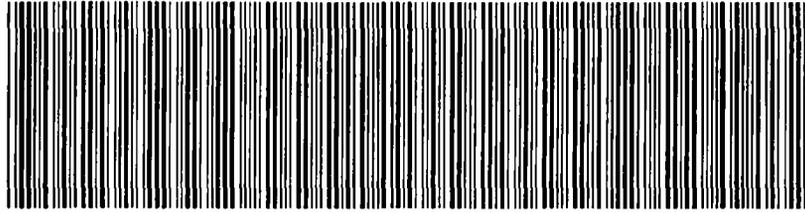
[Services](#) | [News & Features](#) | [City Life](#) | [City Agencies](#) | [Office of the Mayor](#) | [Contact Us](#) | [Search](#)

NYC.gov - NEW YORK CITY'S OFFICIAL WEB SITE

Exhibit B

(Deed)

NYC DEPARTMENT OF FINANCE
OFFICE OF THE CITY REGISTER



2017113000591001002C039D

RECORDING AND ENDORSEMENT COVER PAGE (CONTINUATION)

PAGE 2 OF 10

Document ID: 2017113000591001

Document Date: 11-28-2017

Preparation Date: 12-05-2017

Document Type: DEED

PARTIES

GRANTEE/BUYER:

ANDERSON B LLC
1 BATTERY PARK PLAZA, SUITE 3100
NEW YORK, NY 10004

GRANTEE/BUYER:

ANDERSON C LLC
1 BATTERY PARK PLAZA, SUITE 3100
NEW YORK, NY 10004

GRANTEE/BUYER:

ANDERSON D LLC
1 BATTERY PARK PLAZA, SUITE 3100
NEW YORK, NY 10004

GRANTEE/BUYER:

ANDERSON E LLC
1 BATTERY PARK PLAZA, SUITE 3100
NEW YORK, NY 10004

GRANTEE/BUYER:

ANDERSON F LLC
1 BATTERY PARK PLAZA, SUITE 3100
NEW YORK, NY 10004

GRANTEE/BUYER:

ANDERSON G LLC
1 BATTERY PARK PLAZA, SUITE 3100
NEW YORK, NY 10004

**BARGAIN AND SALE DEED WITHOUT
COVENANT AGAINST GRANTOR'S ACTS**

THIS INDENTURE, dated November 28th, 2017, between Anderson Housing Associates, L.P., having a place of business at 42-22 22nd Street, Long Island City, New York 11101 (the "Grantor"), and Anderson A LLC, Anderson B LLC, Anderson C LLC, Anderson D LLC, Anderson E LLC, Anderson F LLC and Anderson G LLC, jointly and severally, each a New York limited liability company, each having an address at 1 Battery Park Plaza, Suite 3100, New York, NY 10004 (each a "Grantee" and collectively the "Grantees").

WITNESSETH, that Grantor in consideration of the sum of Ten Dollars (\$10.00), and other good and valuable consideration paid by the Grantee, the receipt and sufficiency of which is hereby acknowledged by Grantor, does hereby grant and release and assign forever unto Grantees, and the heirs, successors and assigns of Grantees, that certain plot, piece or parcel of land situate lying and being in the City of New York, County of Bronx, State of New York, as more particularly described in Exhibit A annexed hereto and made a part hereof (the "Land").

Intended to be the same premises conveyed and described in the deed to the parties of the first part herein by dated as of December 27, 1989, recorded January 11, 1990 in Reel 963 page 1321 made by The City of New York.

TOGETHER with all right, title and interest of Grantor in and to any and all buildings and improvements located on the Land (the "Improvements");

TOGETHER with all right, title and interest, if any, of Grantor in and to any easements, rights of way, privileges, benefits, appurtenances, hereditaments, strips, gaps and gores, and any and all other rights, if any, thereon or in any way pertaining thereto, including, without limitation, any land lying in the bed of any streets and roads abutting the above-described property to the center lines thereof (the foregoing rights, together with the Land and the Improvements being hereinafter referred to, collectively, as the "Premises");

TOGETHER with, and subject to, the rights, obligations, agreements, covenants, easements, restrictions and other provisions set forth in the following documents: (i) Regulatory Agreement dated 12/27/1989 between Anderson Housing Associates, L.P. and City of New York acting by and through its Department of Housing Preservation and Development; (ii) Terms, Covenants, Conditions, Provisions, Restrictions and Agreements as set forth in deed dated as of December 27, 1989 between The City of New York and Anderson Housing Associates recorded January 11, 1990 in Reel 963 page 1321; (iii) Terms, Covenants, Conditions, Provisions and Agreements contained in Land Disposition Agreement dated as of December 27, 1989 between The City of New York, acting by and through its Department of Housing Preservation and Development and Anderson Housing Associates recorded January 4, 1990 in Reel 961 page 2471; (iv) Terms, Covenants, Conditions, Provisions and Agreements contained in Regulatory Agreement dated as of December 27, 1989 between The City of New York, acting by and through its Department of Housing Preservation and Development and Anderson Housing Associates recorded January 4, 1990 in Reel 962 page 10; and (v) Assignment of Surplus Monies dated December 27, 1989 from Anderson Housing Associates to The City of New York, acting by and through its Department of Housing Preservation and Development recorded January 4, 1990 in Reel 962 page 29 (collectively hereinafter referred to as the "Agreements"), all of which shall constitute covenants running with the Land and shall bind any person having at any time any interest or estate in any portion of the Premises, as though recited and stipulated at length herein; and

Each Grantee hereby accepts and ratifies the provisions of the Agreements and agrees to comply with all the terms and provisions thereof.

Each Grantee and its successors and assigns and owners of the Premises jointly and severally hereby assumes the performance of all of the terms, covenants and conditions of the Agreements on Grantor's part to be performed thereunder from and after the date hereof and will well and truly perform all of the terms, covenants and conditions of the Agreements from and after the date hereof, all with the same force and effect as though each Grantee jointly and severally had signed the Agreements as a party named therein.

Each Grantee (jointly and severally) does hereby agree for itself, its legal representatives, successors and assigns and owners of the Premises (jointly and severally), to indemnify, defend and save Grantor, its legal representatives, successors and assigns, harmless from and against any and all claims, liability and expense (including, but not limited to, reasonable legal fees and litigation expenses) asserted or arising in connection with the performance by each Grantee (jointly and severally) under the Agreements from and after the date hereof.

TO HAVE AND TO HOLD the Premises herein granted, or mentioned and intended so to be, unto Grantee, and the heirs, successors and assigns of Grantee, forever.

AND Grantor, in compliance with Section 13 of the Lien Law, covenants that Grantor will receive the consideration for this conveyance and will hold the right to receive such consideration as a trust fund to be applied first for the purpose of paying the cost of improvements and will apply the same first to the payment of the cost of improvements before using any part of the total of the same for any other purpose.

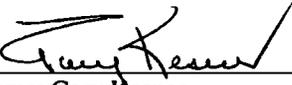
This document may be executed in any number of counterparts, each of which shall be deemed an original, and such counterpart together shall constitute one and the same document. The parties agree that signatures via facsimile and/or pdf transmission shall be considered legal and binding for purposes of this document.

[SIGNATURE PAGE FOLLOWS ON NEXT PAGE]

IN WITNESS WHEREOF, Grantor and Grantee have duly executed this deed the day and year first above written.

GRANTOR:

Anderson Housing Associates, L.P.

By: 
Name: Gary Kesner
Title: Authorized Person

GRANTEE:

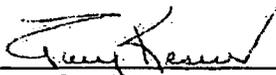
Anderson A LLC,
Anderson B LLC,
Anderson C LLC,
Anderson D LLC,
Anderson E LLC,
Anderson F LLC, and
Anderson G LLC

EEG MW LLC, Manager

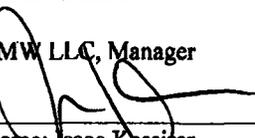
By: _____
Name: Isaac Kassirer
Title: Manager

IN WITNESS WHEREOF, Grantor and Grantee have duly executed this deed the day and year first above written.

GRANTOR:
Anderson Housing Associates, L.P.

By: 
Name: Gary Kesner
Title: Authorized Person

GRANTEE:
Anderson A LLC,
Anderson B LLC,
Anderson C LLC,
Anderson D LLC,
Anderson E LLC,
Anderson F LLC, and
Anderson G LLC

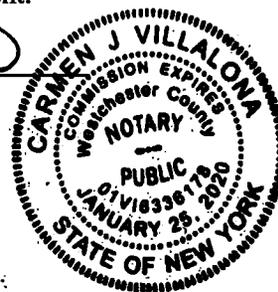
EEG MW LLC, Manager
By: 
Name: Isaac Kassirer
Title: Manager

ACKNOWLEDGMENT

STATE OF NEW YORK)
)
COUNTY OF Queens) ss.:

On the 22nd day of November in the year 2017, before me, the undersigned, a Notary Public in and for said State, personally appeared Gary Kesner, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

Carmen Villalona
Notary Public (SEAL)



STATE OF NEW YORK)
)
COUNTY OF _____) ss.:

SEAL

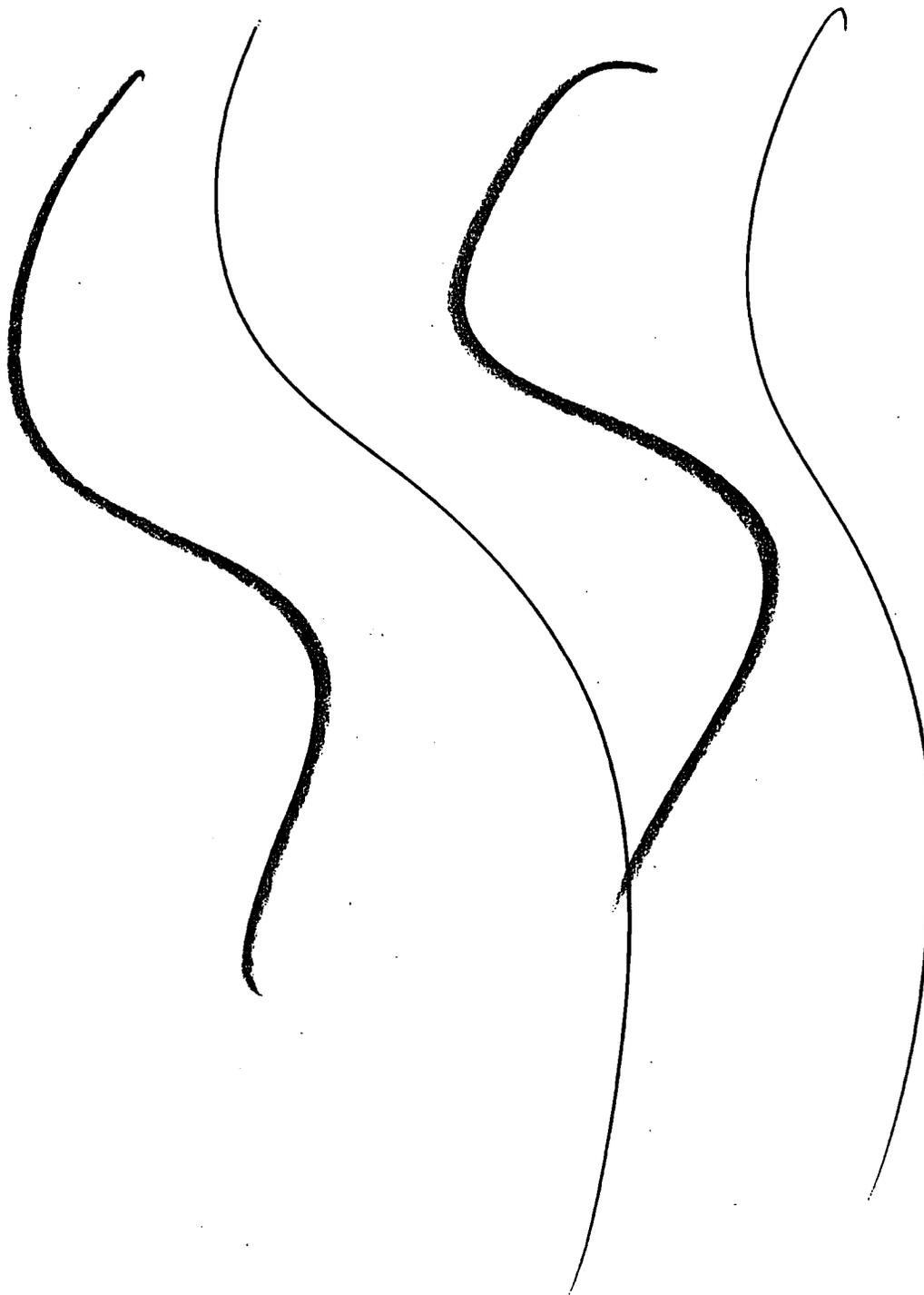
On the ___ day of November in the year 2017, before me, the undersigned, a Notary Public in and for said State, personally appeared _____, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

Notary Public (SEAL)

EXHIBIT A

1187/1197 Anderson Avenue, County of Bronx and State of New York
aka Block 2510 Lot 40

END OF EXHIBIT A



BARGAIN & SALE DEED
WITHOUT COVENANT AGAINST GRANTOR'S ACTS

ANDERSON HOUSING ASSOCIATES, L.P.

TO

**Anderson A LLC,
Anderson B LLC,
Anderson C LLC,
Anderson D LLC,
Anderson E LLC,
Anderson F LLC, and
Anderson G LLC**

County: Bronx
Address: 1187/1197 Anderson Avenue aka Block: 2510 Lot: 40

RECORD AND RETURN TO:

**Jeffrey Zwick, Esq.
Jeffrey Zwick & Associates, P.C.
266 Broadway, Suite 403
Brooklyn, NY 11211**

ACKNOWLEDGMENT

STATE OF NEW YORK)
)
COUNTY OF Queens) ss.:

On the 22nd day of November in the year 2017, before me, the undersigned, a Notary Public in and for said State, personally appeared Gary Kesner, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

Carmen Villalona
Notary Public (SEAL)



STATE OF NEW YORK)
)
COUNTY OF Suffolk) ss.:

On the 28th day of November in the year 2017, before me, the undersigned, a Notary Public in and for said State, personally appeared Isaac Kassler, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

Evie M. Wexler
Notary Public (SEAL)

SEAL

EVIE M. WEXLER
Notary Public, State of New York
Qualified in Kings County No. 01WE5075333
Commission Expires March 31, 2019

Exhibit C

(Multiple Dwelling Registration)

4/29/2022
061620

HPD Building, Registration & Violation Services [Home](#)

The selected address: **1187 ANDERSON AVENUE, Bronx 10452**

This building has filed records with the [New York State Division of Housing and Community Renewal](#) at least one time from 1993 to the present year and may contain one or more regulated apartments.

HPD#	Range	Block	Lot	CD	CensusTract	Stories	A Units	B Units	Ownership	Registration#	Class	
806244	Active	1187-1187	02510	0040	4	19900	6	37	0	PVT	210437	B

- [Other Units](#)
- [Property Owner Registration Information](#)
- [Charges](#)
- [Complaint Status](#)
- [Complaint History](#)
- [Litigation/Case Status](#)
- [Tenant Harassment Report](#)
- [All Open Violations](#)

Building Registration Summary Report

Owner	Last Reg Dt	Reg	Expire Dt	Organization	Last Nm	First Nm	House No	Street Nm	Apt	City	State	Zip
Head Officer	09/30/2021		09/01/2022		BRETON	FRANCISCO	1820	SWARTHMORE AVE	499	LAKEWOOD	NJ	08701
Corporation	09/30/2021	ANDERSON	09/01/2022	A LLC			1820	SWARTHMORE AVE	499	LAKEWOOD	NJ	08701
Managing Agent	09/30/2021		09/01/2022		BRETON	FRANCISCO	2483	CAMBRELENG AVE	LL	Bronx	NY	10458

Exhibit D

(New York State
Department of State
Division of Corporations
Entity Information)

Department of State Division of Corporations

Entity Information

[Return to Results](#) [Return to Search](#)

Entity Details

ENTITY NAME: ANDERSON B LLC	DOS ID: 5219744
FOREIGN LEGAL NAME:	FICTITIOUS NAME:
ENTITY TYPE: DOMESTIC LIMITED LIABILITY COMPANY	DURATION DATE/LATEST DATE OF DISSOLUTION:
SECTION OF LAW: 203 LLC - LIMITED LIABILITY COMPANY LAW	ENTITY STATUS: ACTIVE
DATE OF INITIAL DOS FILING: 10/18/2017	REASON FOR STATUS:
EFFECTIVE DATE INITIAL FILING: 10/18/2017	INACTIVE DATE:
FOREIGN FORMATION DATE:	STATEMENT STATUS: PAST DUE DATE
COUNTY: KINGS	NEXT STATEMENT DUE DATE: 10/31/2019
JURISDICTION: NEW YORK, UNITED STATES	NFP CATEGORY:

[ENTITY DISPLAY](#) [NAME HISTORY](#) [FILING HISTORY](#) [MERGER HISTORY](#) [ASSUMED NAME HISTORY](#)

Service of Process Name and Address

Name: ANDERSON B LLC

Address: 1 BATTERY PARK PLAZA, SUITE 3100, NEW YORK, NY, UNITED STATES, 10004

Chief Executive Officer's Name and Address

Name:

Address:

Principal Executive Office Address

Address:

Registered Agent Name and Address

Name:

Address:

Entity Primary Location Name and Address

Name:

Address:

Farmcorpflag

Is The Entity A Farm Corporation: NO

Department of State Division of Corporations

Entity Information

[Return to Results](#) [Return to Search](#)

Entity Details ^

ENTITY NAME: ANDERSON C LLC	DOS ID: 5219756
FOREIGN LEGAL NAME:	FICTITIOUS NAME:
ENTITY TYPE: DOMESTIC LIMITED LIABILITY COMPANY	DURATION DATE/LATEST DATE OF DISSOLUTION:
SECTION OF LAW: 203 LLC - LIMITED LIABILITY COMPANY LAW	ENTITY STATUS: ACTIVE
DATE OF INITIAL DOS FILING: 10/18/2017	REASON FOR STATUS:
EFFECTIVE DATE INITIAL FILING: 10/18/2017	INACTIVE DATE:
FOREIGN FORMATION DATE:	STATEMENT STATUS: PAST DUE DATE
COUNTY: KINGS	NEXT STATEMENT DUE DATE: 10/31/2019
JURISDICTION: NEW YORK, UNITED STATES	NFP CATEGORY:

ENTITY DISPLAY NAME HISTORY FILING HISTORY MERGER HISTORY ASSUMED NAME HISTORY

Service of Process Name and Address

Name: ANDERSON C LLC

Address: 1 BATTERY PARK PLAZA, SUITE 3100, NEW YORK, NY, UNITED STATES, 10004

Chief Executive Officer's Name and Address

Name:

Address:

Principal Executive Office Address

Address:

Registered Agent Name and Address

Name:

Address:

Entity Primary Location Name and Address

Name:

Address:

Farmcorpflag

Is The Entity A Farm Corporation: NO

Department of State Division of Corporations

Entity Information

[Return to Results](#) [Return to Search](#)

Entity Details ^

ENTITY NAME: ANDERSON D LLC	DOS ID: 5219770
FOREIGN LEGAL NAME:	FICTITIOUS NAME:
ENTITY TYPE: DOMESTIC LIMITED LIABILITY COMPANY	DURATION DATE/LATEST DATE OF DISSOLUTION:
SECTION OF LAW: 203 LLC - LIMITED LIABILITY COMPANY LAW	ENTITY STATUS: ACTIVE
DATE OF INITIAL DOS FILING: 10/18/2017	REASON FOR STATUS:
EFFECTIVE DATE INITIAL FILING: 10/18/2017	INACTIVE DATE:
FOREIGN FORMATION DATE:	STATEMENT STATUS: PAST DUE DATE
COUNTY: KINGS	NEXT STATEMENT DUE DATE: 10/31/2019
JURISDICTION: NEW YORK, UNITED STATES	NFP CATEGORY:

[ENTITY DISPLAY](#) [NAME HISTORY](#) [FILING HISTORY](#) [MERGER HISTORY](#) [ASSUMED NAME HISTORY](#)

Service of Process Name and Address

Name: ANDERSON D LLC

Address: 1 BATTERY PARK PLAZA, SUITE 3100, NEW YORK, NY, UNITED STATES, 10004

Chief Executive Officer's Name and Address

Name:

Address:

Principal Executive Office Address

Address:

Registered Agent Name and Address

Name:

Address:

Entity Primary Location Name and Address

Name:

Address:

Farmcorpflag

Is The Entity A Farm Corporation: NO

Department of State Division of Corporations

Entity Information

[Return to Results](#) [Return to Search](#)

Entity Details ^

ENTITY NAME: ANDERSON E LLC	DOS ID: 5220473
FOREIGN LEGAL NAME:	FICTITIOUS NAME:
ENTITY TYPE: DOMESTIC LIMITED LIABILITY COMPANY	DURATION DATE/LATEST DATE OF DISSOLUTION:
SECTION OF LAW: 203 LLC - LIMITED LIABILITY COMPANY LAW	ENTITY STATUS: ACTIVE
DATE OF INITIAL DOS FILING: 10/19/2017	REASON FOR STATUS:
EFFECTIVE DATE INITIAL FILING: 10/19/2017	INACTIVE DATE:
FOREIGN FORMATION DATE:	STATEMENT STATUS: PAST DUE DATE
COUNTY: KINGS	NEXT STATEMENT DUE DATE: 10/31/2019
JURISDICTION: NEW YORK, UNITED STATES	NFP CATEGORY:

[ENTITY DISPLAY](#) [NAME HISTORY](#) [FILING HISTORY](#) [MERGER HISTORY](#) [ASSUMED NAME HISTORY](#)

Service of Process Name and Address

Name: ANDERSON E LLC

Address: 1 BATTERY PARK PLAZA, SUITE 3100, NEW YORK, NY, UNITED STATES, 10004

Chief Executive Officer's Name and Address

Name:

Address:

Principal Executive Office Address

Address:

Registered Agent Name and Address

Name:

Address:

Entity Primary Location Name and Address

Name:

Address:

Farmcorpflag

Is The Entity A Farm Corporation: NO

Department of State Division of Corporations

Entity Information

[Return to Results](#)

[Return to Search](#)

Entity Details ^

ENTITY NAME: ANDERSON F LLC	DOS ID: 5220488
FOREIGN LEGAL NAME:	FICTITIOUS NAME:
ENTITY TYPE: DOMESTIC LIMITED LIABILITY COMPANY	DURATION DATE/LATEST DATE OF DISSOLUTION:
SECTION OF LAW: 203 LLC - LIMITED LIABILITY COMPANY LAW	ENTITY STATUS: ACTIVE
DATE OF INITIAL DOS FILING: 10/19/2017	REASON FOR STATUS:
EFFECTIVE DATE INITIAL FILING: 10/19/2017	INACTIVE DATE:
FOREIGN FORMATION DATE:	STATEMENT STATUS: PAST DUE DATE
COUNTY: KINGS	NEXT STATEMENT DUE DATE: 10/31/2019
JURISDICTION: NEW YORK, UNITED STATES	NFP CATEGORY:

[ENTITY DISPLAY](#)

[NAME HISTORY](#)

[FILING HISTORY](#)

[MERGER HISTORY](#)

[ASSUMED NAME HISTORY](#)

Service of Process Name and Address

Name: ANDERSON F LLC

Address: 1 BATTERY PARK PLAZA, SUITE 3100, NEW YORK, NY, UNITED STATES, 10004

Chief Executive Officer's Name and Address

Name:

Address:

Principal Executive Office Address

Address:

Registered Agent Name and Address

Name:

Address:

Entity Primary Location Name and Address

Name:

Address:

Farmcorpflag

Is The Entity A Farm Corporation: NO

Department of State Division of Corporations

Entity Information

[Return to Results](#) [Return to Search](#)

Entity Details ^

ENTITY NAME: ANDERSON G LLC	DOS ID: 5225106
FOREIGN LEGAL NAME:	FICTITIOUS NAME:
ENTITY TYPE: DOMESTIC LIMITED LIABILITY COMPANY	DURATION DATE/LATEST DATE OF DISSOLUTION:
SECTION OF LAW: 203 LLC - LIMITED LIABILITY COMPANY LAW	ENTITY STATUS: ACTIVE
DATE OF INITIAL DOS FILING: 10/27/2017	REASON FOR STATUS:
EFFECTIVE DATE INITIAL FILING: 10/27/2017	INACTIVE DATE:
FOREIGN FORMATION DATE:	STATEMENT STATUS: PAST DUE DATE
COUNTY: KINGS	NEXT STATEMENT DUE DATE: 10/31/2019
JURISDICTION: NEW YORK, UNITED STATES	NFP CATEGORY:

[ENTITY DISPLAY](#) [NAME HISTORY](#) [FILING HISTORY](#) [MERGER HISTORY](#) [ASSUMED NAME HISTORY](#)

Service of Process Name and Address

Name: ANDERSON G LLC

Address: 1 BATTERY PARK PLAZA, SUITE 3100, NEW YORK, NY, UNITED STATES, 10004

Chief Executive Officer's Name and Address

Name:

Address:

Principal Executive Office Address

Address:

Registered Agent Name and Address

Name:

Address:

Entity Primary Location Name and Address

Name:

Address:

Farmcorpflag

Is The Entity A Farm Corporation: NO

Department of State Division of Corporations

Entity Information

[Return to Results](#) [Return to Search](#)

Entity Details ^

ENTITY NAME: EEG MW LLC	DOS ID: 5228011
FOREIGN LEGAL NAME:	FICTITIOUS NAME:
ENTITY TYPE: DOMESTIC LIMITED LIABILITY COMPANY	DURATION DATE/LATEST DATE OF DISSOLUTION:
SECTION OF LAW: 203 LLC - LIMITED LIABILITY COMPANY LAW	ENTITY STATUS: ACTIVE
DATE OF INITIAL DOS FILING: 11/01/2017	REASON FOR STATUS:
EFFECTIVE DATE INITIAL FILING: 11/01/2017	INACTIVE DATE:
FOREIGN FORMATION DATE:	STATEMENT STATUS: PAST DUE DATE
COUNTY: KINGS	NEXT STATEMENT DUE DATE: 11/30/2019
JURISDICTION: NEW YORK, UNITED STATES	NFP CATEGORY:

[ENTITY DISPLAY](#) [NAME HISTORY](#) [FILING HISTORY](#) [MERGER HISTORY](#) [ASSUMED NAME HISTORY](#)

Service of Process Name and Address

Name: EEG MW LLC

Address: 1 BATTERY PARK PLAZA, SUITE 3100, NEW YORK, NY, UNITED STATES, 10004

Chief Executive Officer's Name and Address

Name:

Address:

Principal Executive Office Address

Address:

Registered Agent Name and Address

Name:

Address:

Entity Primary Location Name and Address

Name:

Address:

Farmcorpflag

Is The Entity A Farm Corporation: NO

Department of State Division of Corporations

Entity Information

[Return to Results](#) [Return to Search](#)

Entity Details ^

ENTITY NAME: LIVING EMERALD NY LLC	DOS ID: 5797704
FOREIGN LEGAL NAME:	FICTITIOUS NAME:
ENTITY TYPE: DOMESTIC LIMITED LIABILITY COMPANY	DURATION DATE/LATEST DATE OF DISSOLUTION:
SECTION OF LAW: 203 LLC - LIMITED LIABILITY COMPANY LAW	ENTITY STATUS: ACTIVE
DATE OF INITIAL DOS FILING: 07/27/2020	REASON FOR STATUS:
EFFECTIVE DATE INITIAL FILING: 07/27/2020	INACTIVE DATE:
FOREIGN FORMATION DATE:	STATEMENT STATUS: CURRENT
COUNTY: KINGS	NEXT STATEMENT DUE DATE: 07/31/2022
JURISDICTION: NEW YORK, UNITED STATES	NFP CATEGORY:

[ENTITY DISPLAY](#) [NAME HISTORY](#) [FILING HISTORY](#) [MERGER HISTORY](#) [ASSUMED NAME HISTORY](#)

Service of Process Name and Address

Name: LIVING EMERALD NY LLC

Address: 36 AIRPORT ROAD, SUITE 307, LAKEWOOD, NJ, UNITED STATES, 08701

Chief Executive Officer's Name and Address

Name:

Address:

Principal Executive Office Address

Address:

Registered Agent Name and Address

Name:

Address:

Entity Primary Location Name and Address

Name:

Address:

Farmcorpflag

Is The Entity A Farm Corporation: NO