STATE OF NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION

In the Matter of the Alleged Violation of Article 17 of the Environmental Conservation Law (ECL) of the State of New York and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR).

ORDER

DEC Case No. PBS.2-219843.4.2016

-by-

1001 JEROME ASSOCIATES also known as 1001 JEROME LLC,

Respondent.	

This administrative enforcement proceeding addresses allegations of the staff of the New York State Department of Environmental Conservation (Department or DEC) that respondent 1001 Jerome Associates violated ECL 17-1009 and 6 NYCRR 613-1.9(c) by failing to renew the registration of its petroleum bulk storage facility on or before December 14, 2012, the date on which its prior registration expired. Respondent's facility is located at 1001 Jerome Avenue, Bronx, New York and includes an aboveground storage tank with a capacity of 5,000 gallons.

On July 21, 2016, an adjudicatory hearing was convened before Michael S. Caruso, Administrative Law Judge (ALJ) of the DEC's Office of Hearings and Mediation Services. ALJ Caruso prepared the attached hearing report, which I adopt as my decision in this matter, subject to my comments below. As set forth in the ALJ's hearing report, respondent failed to file an answer to the complaint served by Department staff in this matter, failed to appear at a prehearing conference scheduled for March 24, 2016, and failed to appear for the adjudicatory hearing scheduled in the matter on April 26, 2016 and reconvened on July 21, 2016 (see Hearing Report at 4 [Finding of Fact No. 10]).

Staff, in its papers, referred to respondent as "1001 Jerome Associates," which is the name listed in the deed by which it acquired the real property (see Hearing Exhibit 5). The partnership, 1001 Jerome Associates, was converted to a limited liability company, 1001 Jerome LLC in 1996 (see Hearing Exhibits 4, 6A and 6B). The ALJ amended the pleadings, pursuant to Civil Practice Law and Rules 2001, to reflect the name respondent used in acquiring the real property and respondent's current entity name on file with the Department of State (by replacing "1001 Jerome Associates" with "1001 Jerome Associates also known as 1001 Jerome LLC"), and I affirm the ALJ's amendment. I note that Department staff properly served respondent in this proceeding (see Hearing Report at 4 [Finding of Fact No. 9]).

As a consequence of respondent's failure to answer or appear in this matter, the ALJ recommends that Department staff's motion for a default judgment be granted (see Hearing Report at 5). I concur that staff is entitled to a judgment on default pursuant to 6 NYCRR 622.15. At the hearing on July 21, 2016, Department staff presented a prima facie case on the merits, and proved its case by a preponderance of the evidence (see Hearing Report at 5). Accordingly, staff is entitled to a judgment based on record evidence.

The record demonstrates that respondent was required to renew its registration once the registration expired on December 14, 2012, the respondent was also in violation of the registration requirement set forth at former 6 NYCRR 612.2(a), although staff did not reference that regulatory provision in its papers. Department staff did reference the applicable facility registration requirement of 6 NYCRR 613-1.9(c), which became effective on October 11, 2015 and which replaced the previous registration provision in 6 NYCRR part 612. In future matters, Department staff should cite violations of both regulatory sections where, as here, the violations commenced prior to and continued after October 11, 2015.

ECL 71-1929 provides for a civil penalty of up to thirty-seven thousand five hundred dollars (\$37,500) per day for each violation. Department staff, in its papers, sought a civil penalty of ten thousand dollars (\$10,000). At the hearing, Department staff moved to amend its pleadings to reduce the civil penalty to seven thousand five hundred dollars (\$7,500), and the ALJ granted staff's motion.

As noted, respondent has failed to renew the registration for the facility since December 14, 2012 when the registration expired (see Hearing Report at 3 [Finding of Fact No. 8]). Where, as here, an owner has not registered the facility for more than two years but less than five years from the expiration date, and no other violations or mitigating or aggravating factors exist, a civil penalty of seven thousand five hundred dollars (\$7,500) is consistent with administrative precedent (see Matter of 12 Martense Associates LLC, Order of the Commissioner, December 19, 2011, at 2). The requested penalty of seven thousand five hundred dollars (\$7,500) is authorized and appropriate. I hereby direct that respondent submit payment of the civil penalty to the Department within fifteen (15) days of service of this order upon it.

I also direct that respondent submit to the Department a petroleum bulk storage application for the facility within fifteen (15) days of service of this order upon it, together with all applicable registration fees.

NOW, THEREFORE, having considered this matter and being duly advised, it is **ORDERED** that:

- I. Department staff's motion for a default judgment pursuant to 6 NYCRR 622.15 is granted. By failing to answer or appear in this proceeding, respondent 1001 Jerome Associates also known as 1001 Jerome LLC waived its right to be heard at the hearing.
- II. Moreover, based upon record evidence, respondent 1001 Jerome Associates also known as 1001 Jerome LLC violated (a) ECL 17-1009 and (b) since October 11, 2015, 6 NYCRR 613-1.9(c), for failing to renew the registration of its petroleum bulk storage facility located at 1001 Jerome Avenue, Bronx, New York.
- III. Within fifteen (15) days of the service of this order upon respondent 1001 Jerome Associates also known as 1001 Jerome LLC, respondent shall submit to the Department a complete petroleum bulk storage application for the facility, plus applicable registration fees.
- IV. Within fifteen (15) days of the service of this order upon respondent 1001 Jerome Associates also known as 1001 Jerome LLC, respondent shall pay a civil penalty in the amount of seven thousand five hundred dollars (\$7,500) by certified check, cashier's check or money order made payable to the New York State Department of Environmental Conservation.
- V. The petroleum bulk storage application, applicable registration fees, and the penalty payment shall be sent to the following address:

Office of General Counsel (Remediation Bureau) NYS Department of Environmental Conservation 625 Broadway, 14th Floor Albany, New York 12233-1500 Attn: Yvonne M. Ward, Esq.

VI. Any questions or other correspondence regarding this order shall also be addressed to Yvonne M. Ward, Esq. at the address referenced in paragraph V of this order.

VII.	The provisions, terms and conditions of this order shall bind respondent 1001				
	Jerome Associates also known as 1001 Jerome LLC, and its agents, successors and				
	assigns, in any and all capacities.				

For the New York State Department of Environmental Conservation					
By:	/s/				
	Basil Seggos				
	Commissioner				
	Commissioner				

Dated: Albany, New York January 20, 2017

STATE OF NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION

In the Matter of the Alleged Violation of Article 17 of the Environmental Conservation Law (ECL) of the State of New York and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR),

HEARING REPORT

DEC Case No. PBS.2-219843.4.2016

-by-

1001 JEROME ASSOCIATES also known as 1001 JEROME LLC.

Respondent.

Procedural History

Staff of the New York State Department of Environmental Conservation (Department) served respondent 1001 Jerome Associates with a notice of hearing and complaint, dated February 16, 2016, alleging a violation of ECL 17-1009 and its implementing regulation, 6 NYCRR 613-1.9(c) for failing to renew the registration of its petroleum bulk storage facility located at 1001 Jerome Avenue, Bronx, New York on or before December 14, 2012, the date on which its prior registration expired. The complaint seeks an order of the Commissioner: (1) finding respondent in violation of ECL 17-1009 and 6 NYCRR 613-1.9(c); (2) assessing a civil penalty in the amount of ten thousand dollars (\$10,000); (3) directing respondent to register its petroleum bulk storage facility within fifteen (15) days of the service of the Commissioner's order by remitting the applicable registration fee along with a complete registration application; and (4) granting such other and further relief as the Commissioner shall deem just and appropriate.

Inasmuch as respondent is an active domestic limited liability company in the State of New York, service of the notice of hearing and complaint on respondent was made by serving the New York State Department of State on February 16, 2016 (see Staff Exhibit 3). Department staff also provided additional service by sending the notice of hearing and complaint to respondent by first class mail on February 16, 2016 (see id.). Respondent failed to file an answer to the complaint, and failed to appear at a pre-hearing conference scheduled for March 24, 2016, as directed in the notice of hearing and accompanying cover letter (see Staff Exhibit 2).

As stated in the notice of hearing, on April 26, 2016, an adjudicatory hearing was convened before me at the Department's Region 2 offices, 1 Hunter's Point Plaza, 47-40 21st Street, Long Island City, New York. Department staff was represented by Yvonne M. Ward, Esq., Remediation Bureau, Office of General Counsel, New York State Department of

¹ Respondent 1001 Jerome Associates is also known as 1001 Jerome LLC because 1001 Jerome Associates was converted from a partnership to a limited liability company known as 1001 Jerome LLC. The deed to 1001 Jerome Avenue, Bronx, NY is still held by 1001 Jerome Associates.

Environmental Conservation, 625 Broadway, Albany, New York. No one appeared on behalf of respondent.

Department staff indicated that it was prepared to proceed with the hearing, proffering a staff witness. Noting for the record that respondent had failed to answer the complaint, failed to appear for the pre-hearing conference and failed to appear for the adjudicatory hearing, Department staff moved orally for a default judgment pursuant to 6 NYCRR 622.15. I reserved on the default motion, allowing the record to remain open for Department staff to submit the documentation required by 6 NYCRR 622.15(b). Moreover, I noted Department staff's readiness for hearing, noted the failure of respondent to appear and advised staff that if staff wished to proceed with the hearing on the matter at a later date, that the hearing would be reconvened on notice to respondent.

The Office of Hearings and Mediation Services served a Notice of Hearing dated June 7, 2016 on respondent by first class mail advising respondent that the hearing in this matter would be reconvened on July 21, 2016 at 10:00 a.m. At 11:35 a.m. on July 21, 2016, the adjudicatory hearing was reconvened before the undersigned at the Department's Central Office at 625 Broadway, Albany, New York 12233. Department staff was represented by law student intern Grant A. Giel under the supervision of Yvonne M. Ward, Esq. No one appeared on behalf of the respondent.

Department staff orally renewed its motion for a default judgment and also sought judgment on the merits. Department staff called one witness, Benjamin Conlon, Associate Attorney with the Department's Office of General Counsel, and Section Chief in the Bureau of Remediation. In all, fourteen (14) exhibits were received in evidence.²

Applicable Regulatory Provision

613-1.9 Registration³

* * *

"(c) *Renewal*. Registration must be renewed every five years from the date of the last valid registration certificate until the department receives written notice and documentation from the facility owner that the facility has been permanently closed in accordance with section 613-2.6(b), 613-3.5(b), or 613-4.5(b) of this Part, or that ownership of the facility has been transferred in accordance with subdivision (d) of this section."

² I kept the hearing record open until July 22, 2016 to allow Department staff to submit Exhibits 12, 13 and 14.

³ Effective October 11, 2015, 6 NYCRR 613-1.9 replaced 6 NYCRR 612.2, Registration of Facilities, which read in part, "(a) *Existing facilities*. . . . (2) Registration must be renewed every five years from the date of the last valid registration until the department receives written notice that the facility has been permanently closed or that ownership of the facility has been transferred." ECL 17-1009(2) requires facility registrations to be "renewed every five years or whenever ownership of a facility is transferred, whichever occurs first."

Findings of Fact

The following facts are found based upon the preponderance of evidence presented at the hearing, see 6 NYCRR 622.11(c):

- 1. Respondent 1001 Jerome Associates also known as 1001 Jerome LLC (respondent) is the owner of a petroleum bulk storage facility having a capacity of over 1,100 gallons located at 1001 Jerome Avenue, Bronx, NY (facility). In particular, petroleum storage tank number 001 at the facility has a capacity of 5,000 gallons and is located aboveground. See Testimony of Benjamin Conlon; Staff Exhibits 5, 7, 8 and 9.
- 2. On September 13, 1984, Jerome Towers, Inc., by deed, transferred all right, title and interest in the facility to respondent 1001 Jerome Associates, the facility's current owner. This deed is recorded in the Office of the City Register of the City of New York, in Reel 563, Page 600. See Testimony of Benjamin Conlon; Staff Exhibit 5.
- 3. Respondent 1001 Jerome Associates is also known as 1001 Jerome LLC, an active domestic limited liability company in the State of New York. Respondent was converted from a partnership to a limited liability company on May 24, 1996. <u>See</u> Testimony of Benjamin Conlon; Staff Exhibits 4, 6A, and 6B.
- 4. Respondent submitted a Petroleum Bulk Storage (PBS) Application, dated October 10, 2007, to renew its PBS registration. See Testimony of Benjamin Conlon; Staff Exhibit 7.
- 5. On October 18, 2007, the Department issued Petroleum Bulk Storage (PBS) Registration Certificate No. 2-219843 to respondent. This registration expired on December 14, 2012. See Testimony of Benjamin Conlon; Staff Exhibit 8.
- 6. Benjamin Conlon is an Associate Attorney in the Department's Office of General Counsel, serving as a Section Chief in the Bureau of Remediation, whose responsibilities include enforcement of the Petroleum Bulk Storage, Chemical Bulk Storage, and Major Oil Storage Facilities laws and regulations. Mr. Conlon is authorized to access and inspect the Department's unified information system (UIS) and the electronic repository for scanned documents known as DecDOCS. The UIS and DecDOCS are databases maintained by the Department and contain petroleum bulk storage facility records filed with the Department, which records include petroleum bulk storage facility registrations filed pursuant to 6 NYCRR 613-1.9. See Testimony of Benjamin Conlon.
- 7. On July 5, 2016, Benjamin Conlon searched the petroleum bulk storage facility records contained in the Department's UIS and DecDOCS databases for any petroleum bulk storage facility registration or renewal registration filed by respondent for the facility. See Testimony of Benjamin Conlon.
- 8. As a result of his search, Benjamin Conlon confirmed that respondent had not renewed the registration of the facility since the prior registration expired on December 14, 2012. See Testimony of Benjamin Conlon; see also Staff Exhibit 9 (includes handwritten initials of witness reflecting that he checked database on July 20, 2016).

- 9. As shown by Receipt for Service No. 201602260003 issued by the New York State Department of State, respondent was served personally, on February 16, 2016, pursuant to section 303 of the Limited Liability Company Law with a notice of hearing and complaint dated February 16, 2016, alleging a violation of ECL 17-1009 and its implementing regulation, 6 NYCRR 613-1.9(c), together with a cover letter, statement of readiness and supporting affirmation, for failure to renew the registration of its petroleum bulk storage facility located at 1001 Jerome Avenue, Bronx, New York on or before December 14, 2012, the date that the prior registration expired. Consistent with CPLR 3215(g)(4), Department staff also provided additional service by sending the notice of hearing and complaint to respondent's last known address by first class mail on February 16, 2016. See Staff Exhibits 2, 3, 12 and 13; see also Hearing Record.
- 10. Respondent failed to file an answer to the complaint, failed to appear at a pre-hearing conference scheduled for March 24, 2016, as directed in the notice of hearing and accompanying cover letter, and failed to appear for the adjudicatory hearing scheduled in the matter on April 26, 2016 and reconvened on July 21, 2016, as directed in the notices of hearing. See Hearing Record.

Discussion

Before discussing Department staff's case, a correction must be made to Department staff's papers. Department staff's papers are captioned and pleaded against 1001 Jerome Associates, the correct name of the current real property owner of record (see Staff Exhibit 5). However, 1001 Jerome Associates, a partnership, was converted to a limited liability company, 1001 Jerome LLC (see Finding of Fact No. 3; Staff Exhibits 4, 6A and 6B). The PBS application received by the Department on October 15, 2007, lists the owner of the facility as 1001 Jerome LLC (see Staff Exhibit 7) and the PBS Certificate was issued to 1001 Jerome LLC and lists 1001 Jerome LLC as the owner (see Staff Exhibit 8). As demonstrated by Staff exhibits 4, 6A and 6B, the two named entities are the same.

I conclude that the use of 1001 Jerome Associates is not fatal to Department staff's case, but the caption and pleadings should be corrected to read 1001 Jerome Associates also known as 1001 Jerome LLC. Civil Practice Law and Rules (CPLR) 2001 authorizes the court to disregard or "correct, sua sponte, any defect, provided any substantial right of the party is not prejudiced." (See Albilia v Hillcrest General Hospital and Rosenfeld, 124 AD2d 499, 500 [1st Dept 1986].) In this case, correction of the pleadings is appropriate to ensure the correct legal name of respondent is used in any Commissioner's order issued in this matter. Respondent is not prejudiced by this correction because all correspondence and service were made on the intended respondent's correct address, and the pleadings and all dispositive documents reference the intended respondent's PBS number 2-219843. Respondent was fairly apprised that Department staff intended to seek judgment against respondent related to respondent's PBS registration obligations. (See Albilia, at 500; see also Ryan v Nationwide Mutual Insurance Co., 20 AD2d 270, 271-272 [4th Dept 1964] [plaintiff allowed to change captioned name of defendant where the intended defendant was served and fairly apprised that it was party to the action]; Smith v Hennesey, 266 AD2d 692 [3d Dept 1999][court properly disregarded mistake in complaint in which last two words of defendant's assumed name were transposed]; State of New York Higher Educ. Servs. Corp. v Sparozic, 35 AD3d 1069, 1070 [3d Dept 2006], lv dismissed 8 NY3d 958 [2007] [misspelling of defendant's name on summons with notice and affidavit of service was a

mere irregularity which did not affect jurisdiction over defendant].) Therefore, I hereby deem the caption to the notice of hearing and complaint and the pleadings to be amended to correct respondent's name to 1001 Jerome Associates also known as 1001 Jerome LLC as reflected in this hearing report and its caption.

A respondent upon whom a complaint has been served must serve an answer within 20 days of receiving a notice of hearing and complaint. See 6 NYCRR 622.4(a). A respondent's failure to file a timely answer "constitutes a default and a waiver of respondent's right to a hearing." 6 NYCRR 622.15(a). In addition, attendance by a respondent at a scheduled prehearing conference or hearing is mandatory, "and failure to attend constitutes a default and a waiver of the opportunity for a hearing." 6 NYCRR 622.8(c); see also 6 NYCRR 622.15(a) ("A respondent's ... failure to appear at the hearing or the pre-hearing conference ... constitutes a default and a waiver of respondent's right to a hearing").

Upon a respondent's failure to answer a complaint or failure to appear for a pre-hearing conference or hearing, Department staff may make a motion to an ALJ for a default judgment. Such motion must contain (i) proof of service upon respondent of the notice of hearing and complaint; (ii) proof of respondent's failure to appear or to file a timely answer; and (iii) a proposed order. See 6 NYCRR 622.15(b)(1)-(3).

As the Commissioner has held, "a defaulting respondent is deemed to have admitted the factual allegations of the complaint and all reasonable inferences that flow from them." <u>Matter of Alvin Hunt, d/b/a Our Cleaners</u>, Decision and Order of the Commissioner, July 25, 2006, at 6 (citations omitted). In addition, in support of a motion for a default judgment, staff must "provide proof of the facts sufficient to support the claim." <u>Matter of Queen City Recycle Center, Inc.</u>, Decision and Order of the Commissioner, December 12, 2013, at 3.

In this case, Department staff's proof presents a prima facie case demonstrating that respondent failed to renew the registration of its petroleum bulk storage facility located at 1001 Jerome Avenue, Bronx, New York on or before December 14, 2012, the date that the prior registration expired, in violation of ECL 17-1009. Respondent was in violation of 6 NYCRR 613-1.9(c) from the effective date of part 613, October 11, 2015.

The record establishes that: (i) Department staff served the notice of hearing and complaint upon respondent; (ii) respondent failed to file an answer to the complaint and failed to appear at a pre-hearing conference scheduled for March 24, 2016, as directed in the cover letter served with the notice of hearing and complaint; and (iii) respondent failed to appear for the adjudicatory hearing scheduled in the matter on April 26, 2016 and reconvened on July 21, 2016, as directed in the notices of hearing. Department staff provided its proposed order at the July 21, 2016 hearing. The Department is entitled to a default judgment in this matter pursuant to the provisions of 6 NYCRR 622.15.

Moreover, the proof adduced at the hearing, conducted in respondent's absence, demonstrates by a preponderance of the evidence that respondent failed to renew the registration of its petroleum bulk storage facility located at 1001 Jerome Avenue, Bronx, New York on or before December 14, 2012, the date that the prior registration expired, in violation of ECL 17-1009 and 6 NYCRR 613-1.9(c). The Department is entitled to judgment upon the facts proven. At the July 21, 2016 hearing, Department staff moved orally to amend the complaint to reduce the civil penalty requested from ten thousand dollars (\$10,000) to seven thousand five hundred

dollars (\$7,500). Pursuant to 6 NYCRR 622.10(b)(1)(i), I granted Department staff's motion to amend the pleadings, as there is no prejudice to respondent in reducing the penalty requested.

Department staff's proposed order seeks a civil penalty of seven thousand five hundred dollars (\$7,500). This requested civil penalty is consistent with the Department's penalty policy as well as applicable provisions of ECL article 71 and administrative precedent. See e.g. Matter of 12 Martense Associates LLC, Order of the Commissioner, December 19, 2011, at 2.

Recommendation

Based upon the foregoing, I recommend that the Commissioner issue an order:

- 1. Granting Department staff's motion for default, holding respondent 1001 Jerome Associates also known as 1001 Jerome LLC in default pursuant to the provisions of 6 NYCRR 622.15;
- 2. Holding that, based upon the proof adduced at the adjudicatory hearing, respondent 1001 Jerome Associates also known as 1001 Jerome LLC violated ECL 17-1009 and since October 11, 2015 violated 6 NYCRR 613-1.9(c) by failing to renew the registration of its petroleum bulk storage facility located at 1001 Jerome Avenue, Bronx, New York on or before December 14, 2012, the date that the prior registration expired;
- 3. Directing respondent 1001 Jerome Associates also known as 1001 Jerome LLC to submit to the Department, within fifteen (15) days of service of the Commissioner's order, a complete registration application for the facility, together with the applicable registration fees;
- 4. Directing respondent 1001 Jerome Associates also known as 1001 Jerome LLC to pay a civil penalty in the amount of seven thousand five hundred dollars (\$7,500) within fifteen (15) days of service of the Commissioner's order on respondent; and
- 5. Directing such other and further relief as he may deem just and appropriate.

_____/s/_ Michael S. Caruso Administrative Law Judge

Dated: Albany, New York August 3, 2016

EXHIBIT CHART - PBS EXPEDITED PROCEEDINGS

1001 Jerome Associates also known as 1001 Jerome LLC
1001 Jerome Avenue, Bronx, New York – DEC Case No. PBS.2-219843.4.2016
July 21, 2016 – Central Office
Edirol File No. 021229084147

Exhibit No.	Description	ID'd?	Rec'd	Offered By	Notes
1	May 25, 2016 Practice Order of the Appellate Division, Third Department (Peters, P.J.), for appointment of law interns, including, Grant A. Giel.	√	✓	Department Staff	
2	Cover Letter from Yvonne M. Ward, Esq. to respondent, with Notice of Hearing, Complaint, and Statement of Readiness, all dated February 16, 2016 and an undated Affirmation of Yvonne M. Ward.	√	✓	Department Staff	
3	Affidavit of Service of Dale Thiel, sworn to July 7, 2016 with New York State Department of State Receipt for Service dated February 16, 2016.	√	✓	Department Staff	
4	NYS Department of State Entity Information, dated July 18, 2016.	✓	√	Department Staff	
5	New York City Department of Finance, ACRIS Title Search, dated July 18, 2016 and deed to respondent, dated September 13, 1984.	✓	✓	Department Staff	

Exhibit No.	Description	ID'd?	Rec'd	Offered By	Notes
6A	Multifamily Mortgage, Assignment of Rents and Security Agreement, from 1001 Jerome LLC, a New York Limited Liability Company converted from 1001 Jerome Associates, a partnership, to Bankers Federal Savings FSB, dated June 6, 1996.	√	✓	Department Staff	
6B	Assignment of Leases and Rents, from 1001 Jerome LLC to Sovereign Bank, dated March 19, 2007.	✓	\	Department Staff	
7	PBS Application from 1001 Jerome LLC, dated October 10, 2007.	√	√	Department Staff	
8	PBS Registration Certificate issued to 1001 Jerome LLC, October 18, 2007, expiration date December 14, 2012.	✓	✓	Department Staff	
9	PBS Program Facility Information Report, dated July 5, 2016.	✓	✓	Department Staff	
10	Affirmation of attempted contact by Yvonne M. Ward, dated July 18, 2016.	✓	*	Department Staff	
11	Proposed Order.	✓	~	Department Staff	

Exhibit No.	Description	ID'd?	Rec'd	Offered By	Notes
12	New York City Housing Preservation and Development, Building Registration Summary Report for 1001 Jerome Avenue, Bronx, NY generated July 21, 2016.	√	✓	Department Staff	
13	New York City Department of Finance, Property Tax Bill, for 1001 Jerome Avenue, Bronx, NY generated June 3, 2016.	√	✓	Department Staff	
14	Affidavit of PBS Tank Registration by Jack A. Aversa, sworn to July 22, 2016.	√	✓	Department Staff	