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

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WINIFRED COULTON, MARTHA MATEO, SANDRA CANTO, YUDELKA MEJIA, ANGELINA DIAZ, ESPERANZA VASQUEZ, AURELIA MARTINEZ, ARGENTINA GONZALEZ, ASHLEY PAGAN, NIDIA LOPEZ, RAYMOND GARCIA, ZOILA ESCANO, NANCY DURAN, BERNARDA PORTES, TYKIMA JONES, TIFFANY GUITY, ESVIN DIAZ, LUCIA MEJIA, RODRIGO ROJAS, MARINA DOBLE, BRENDA IRIZARRY, VICTOR GUTIERREZ, FAUSTINA SANTANA, OLGA ARZU, ZAIDA ORTIZ, AMBAR SIERRA, MIGUEL ORTEGA TORRES, BERKIS ALVAREZ, THANIA DAMIRAN, CESAR MARTE, JOSE FIGUEROA, GLORIA GUZMAN, JHOANNA GONZALEZ, BRYANT WILSON, LORRAINE GASKIN, REYES MUNIZ, MARIA MENDEZ, JUANA MARTINEZ, MARIA DAVIS, FELICIA BRITO, SANDY RAMOS, Petitioners,

ORDER TO SHOW CAUSE

Index No.

Premises: 1349 Stratford Avenue Bronx, NY 10472

-against-

PATBRU REALTY CO. LLC, CONCORD MANAGEMENT OF NY, LLC, MICHAEL ROONEY, MICHAEL ROONEY, JR.,

Respondents,

-and-

# THE NEW YORK CITY DEPARTMENT OF HOUSING PRESERVATION AND DEVELOPMENT,

Respondent.

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Upon the annexed Verified Petition of the above-named Petitioners and the exhibits attached thereto, and good cause having been shown, it is hereby:

**ORDERED** that Respondents or their attorneys appear at a Trial Term of this Court, Part <u>ROOM 350, IN PERSON,</u> <u>K</u> thereof, to be bedd xia Microsoft Teams on <u>JUNE</u>, <u>15TH</u>, 2022 at 9:30 a.m. or as soon thereafter as counsel may be heard, and show cause why an order should not be made or entered:

- a) directing Respondents to correct the Housing Maintenance Code violations listed in the annexed verified petition and its exhibits within the time set for certifying the correction of such violations pursuant to Section 27-2115(c) of that Code or be subject to the civil penalties provided for by Section 27-2115(a) of that Code;
- b) requiring Respondents, pursuant to Housing Maintenance Code Sections 27-2115 and 27-2121, to correct all violations of that Code that may arise in the subject apartments or the common areas of the subject building during the pendency of the proceeding;
- c) directing Respondents, pursuant to New York City Civil Court Act Section 110(a), to correct the conditions listed in the annexed verified petition and its exhibits constituting violations of the Housing Maintenance Code, Multiple Dwelling Law, Building Code, or Health Code, within the time provided for by law;
- d) imposing civil penalties on Respondent-landlords, pursuant to Section 27-2115(a) of the Housing Maintenance Code, for all Housing Maintenance Code violations for which Respondent-landlords received notices of violation from the New York City Department of Housing Preservation and Development ("HPD") and for which the time for correction has already expired;
- e) finding that Respondent-landlords harassed Petitioners in violation of Sections 27-2005(d) and 27-2004(a)(48) of the Housing Maintenance Code and imposing the appropriate penalties pursuant to Section 27-2115(m) of that Code;
- f) enjoining Respondent-landlords from engaging in acts or omissions which constitute harassment under Section 27-2004(a)(48) of the Housing Maintenance Code;
- g) awarding Petitioners, pursuant to Section 27-2115(o) of the Housing Maintenance Code, compensatory damages or \$1,000.00, reasonable attorneys' fees and costs, and punitive damages; and

h) granting Petitioners such other and further relief as this Court deems just and proper.

It is further **ORDERED** that service of a copy of this order, together with the papers upon which it was granted, shall be made on or before May <u>11TH</u>, 2022 as follows:

- Upon Respondents PATBRU REALTY CO, LLC, MICHAEL ROONEY and MICHAEL ROONEY, JR. by certified mail, return receipt requested, to 1328 New York Avenue, Huntington Station, NY 11746 and upon CONCORD MANAGEMENT OF NY, LLC by certified mail, return receipt requested to 50 West 132<sup>nd</sup> Street, New York, NY 10037 as these are the addresses these Respondents registered with HPD pursuant to Section 27-2115(j) of the Housing Maintenance Code;
- 2. Upon Respondent THE NEW YORK CITY DEPARTMENT OF HOUSING PRESERVATION AND DEVELOPMENT, Housing Litigation Bureau by e-mail to <u>servehpd@hpd.nyc.gov</u>, <u>hldbronxcases@hpd.nyc.gov</u>, and <u>eddisons@hpd.nyc.gov</u>.

Dated: May <u>4TH</u>, 2022 Bronx, New York

APPROVED ahahn , 5/4/2022, 3:52:51 pm

Housing Court Judge

#### FILED: BRONX CIVIL COURT - L&T 05/03/2022 03:16 PM

NYSCEF DOC. NO. 1

INDEX NO. LT-311501-22/BX RECEIVED NYSCEF: 05/03/2022

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

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WINIFRED COULTON, MARTHA MATEO, SANDRA CANTO, YUDELKA MEJIA, ANGELINA DIAZ, ESPERANZA VASQUEZ, AURELIA MARTINEZ, ARGENTINA GONZALEZ, ASHLEY PAGAN, NIDIA LOPEZ, RAYMOND GARCIA, ZOILA ESCANO, NANCY DURAN, BERNARDA PORTES, TYKIMA JONES, TIFFANY GUITY, ESVIN DIAZ, LUCIA MEJIA, RODRIGO ROJAS, MARINA DOBLE, BRENDA IRIZARRY, VICTOR GUTIERREZ, FAUSTINA SANTANA, OLGA ARZU, ZAIDA ORTIZ, AMBAR SIERRA, MIGUEL ORTEGA TORRES, BERKIS ALVAREZ, THANIA DAMIRAN, CESAR MARTE, JOSE FIGUEROA, GLORIA GUZMAN, JHOANNA GONZALEZ, BRYANT WILSON, LORRAINE GASKIN, REYES MUNIZ, MARIA MENDEZ, JUANA MARTINEZ, MARIA DAVIS, FELICIA BRITO, SANDY RAMOS,

**VERIFIED PETITION** 

Index No.

Premises: 1349 Stratford Avenue Bronx, NY 10472

Petitioners,

-against-

PATBRU REALTY CO, LLC, CONCORD MANAGEMENT OF NY, LLC, MICHAEL ROONEY, MICHAEL ROONEY, JR.,

Respondents,

-and-

THE NEW YORK CITY DEPARTMENT OF HOUSING PRESERVATION AND DEVELOPMENT,

Respondent.

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Petitioners WINIFRED COULTON, MARTHA MATEO, SANDRA CANTO, YUDELKA MEJIA, ANGELINA DIAZ, ESPERANZA VASQUEZ, AURELIA MARTINEZ,

ARGENTINA GONZALEZ, ASHLEY PAGAN, NIDIA LOPEZ, RAYMOND GARCIA, ZOILA ESCANO, NANCY DURAN, BERNARDA PORTES, TYKIMA JONES, TIFFANY GUITY, ESVIN DIAZ, LUCIA MEJIA, RODRIGO ROJAS, MARINA DOBLE, BRENDA IRIZARRY, VICTOR GUTIERREZ, FAUSTINA SANTANA, OLGA ARZU, ZAIDA ORTIZ, AMBAR SIERRA, MIGUEL ORTEGA TORRES, BERKIS ALVAREZ, THANIA DAMIRAN, CESAR MARTE, JOSE FIGUEROA, GLORIA GUZMAN, JHOANNA GONZALEZ, BRYANT WILSON, LORRAINE GASKIN, REYES MUNIZ, MARIA MENDEZ, JUANA MARTINEZ, MARIA DAVIS, FELICIA BRITO, SANDY RAMOS, by their attorneys, THE LEGAL AID SOCIETY, respectfully allege the following:

## PRELIMINARY STATEMENT

- Petitioners seek an order to correct conditions within the subject premises that are affecting Petitioners' life, health, and safety, as well as those constituting violations of the Housing Maintenance Code, Multiple Dwelling Law, Building Code, or Health Code. Such conditions include, but are not limited to, a building-wide gas outage that started in January 2022, intermittent heat and hot water outages, leaks, mold, and a defective intercom.
- Petitioners further seek an order finding that Respondent-landlords have harassed them, enjoining Respondent-landlords from continuing to do so, and imposing civil penalties on Respondent-landlords for their illegal conduct including harassment.

## THE SUBJECT BUILDING AND PARTIES

- The subject premises are located at 1349 Stratford Avenue, Bronx, New York 10472 (the "subject building").
- 4. The individual Petitioners set forth herein are tenants or lawful occupants entitled to enforce the Housing Maintenance Code, and other housing standards laws, under law.
- 5. The term "resides" as used herein shall include, without limitation, those who reside by tenancy, co-tenancy, sublease, and/or license of the tenant.
- 6. Petitioner Winifred Coulton resides in Apartment 1H of the subject building.
- 7. Petitioner Martha Mateo resides in Apartment 1C of the subject building.

8.	Petitioner Sandra Canto resides in apartment 1D of the subject building.
9.	Petitioner Yudelka Mejia resides in apartment 1E of the subject building.
10.	Petitioner Angelina Diaz resides in apartment 1G of the subject building.
11.	Petitioner Esperanza Vasquez resides in apartment 1L of the subject building.
12.	Petitioner Aurelia Martinez resides in apartment 2B of the subject building.
13.	Petitioner Argentina Gonzalez resides in apartment 2C of the subject building.
14.	Petitioner Ashley Pagan resides in apartment 2D of the subject building.
15.	Petitioner Nidia Lopez resides in apartment 2E of the subject building.
16.	Petitioner Raymond Garcia resides in apartment 2G of the subject building.
17.	Petitioner Zoila Escano resides in apartment 2H of the subject building.
18.	Petitioner Nancy Duran resides in apartment 2J of the subject building.
19.	Petitioner Bernarda Portes resides in apartment 2K of the subject building.
20.	Petitioner Tykima Jones resides in apartment 2L of the subject building.
21.	Petitioner Tiffany Guity resides in apartment 3A of the subject building.
22.	Petitioner Esvin Diaz resides in apartment 3B of the subject building.
23.	Petitioner Lucia Mejia resides in apartment 3C of the subject building.
24.	Petitioner Rodrigo Rojas resides in apartment 3D of the subject building.
25.	Petitioner Marina Doble resides in apartment 3E of the subject building.
26.	Petitioner Brenda Irizarry resides in apartment 3H of the subject building.
27.	Petitioner Victor Gutierrez resides in apartment 3J of the subject building.
28.	Petitioner Faustina Santana resides in apartment 4A of the subject building.
29.	Petitioner Olga Arzu resides in apartment 4B of the subject building.
30.	Petitioner Zaida Ortiz resides in apartment 4C of the subject building.
31.	Petitioner Ambar Sierra resides in apartment 4G of the subject building.

32.	Petitioner Miguel Ortega Torres resides in apartment 4I of the subject building.
33.	Petitioner Berkis Alvarez resides in apartment 4L of the subject building.
34.	Petitioner Thania Damiran resides in apartment 5D of the subject building.
35.	Petitioner Cesar Marte resides in apartment 5E of the subject building.
36.	Petitioner Jose Figueroa resides in apartment 5G of the subject building.
37.	Petitioner Gloria Guzman resides in apartment 5H of the subject building.
38.	Petitioner Jhoanna Gonzalez resides in apartment 5I of the subject building.
39.	Petitioner Bryant Wilson resides in apartment 5J of the subject building.
40.	Petitioner Lorraine Gaskin resides in apartment 6A of the subject building.
41.	Petitioner Reyes Muniz resides in apartment 6C of the subject building.
42.	Petitioner Maria Mendez resides in apartment 6D of the subject building.
43.	Petitioner Juana Martinez resides in apartment 6F of the subject building.
44.	Petitioner Maria Davis resides in apartment 6G of the subject building.
45.	Petitioner Felicia Brito resides in apartment 6H of the subject building.
46.	Petitioner Sandy Ramos resides in apartment 6L of the subject building.
47.	Respondent PATBRU REALTY CO, LLC is an owner of the subject building as defined
	in Housing Maintenance Code § 27-2004(a)(45). According to the "Building Registration
	Summary Report" on the New York City Department of Housing Preservation and
	Development ("HPD") website, Respondent PATBRU REALTY CO, LLC is the
	"Corporation" in control of the subject building and is located at 1328 New York
	Avenue, Huntington Station, NY 11746. See Exhibit A – HPD Open Violations Page
	Dated April 14, 2022.
48.	Respondent CONCORD MANAGEMENT OF NY, LLC is an owner of the subject
	building as defined in Housing Maintenance Code $8.27-2004(a)(45)$ . According to the

48. Respondent CONCORD MANAGEMENT OF NY, LLC is an owner of the subject building as defined in Housing Maintenance Code § 27-2004(a)(45). According to the "Building Registration Summary Report" on the HPD website, Respondent CONCORD MANAGEMENT OF NY, LLC is a "Managing Agent" in control of the subject building, and is located at 50 West 132<sup>nd</sup> Street, New York, NY 10037. See id.

- 49. Respondent MICHAEL ROONEY is an owner of the subject building as defined in Housing Maintenance Code § 27-2004(a)(45). According to the "Building Registration Summary Report" on the HPD website, Respondent MICHAEL ROONEY is the "Head Officer" in control of the subject building, and is located at 1328 New York Avenue, Huntington Station, NY 11746 . See id.
- 50. Respondent MICHAEL ROONEY, JR. is an owner of the subject building as defined in Housing Maintenance Code § 27-2004(a)(45). According to the "Building Registration Summary Report" on the HPD website, Respondent MICHAEL ROONEY, JR. is both an "Officer" and "Managing Agent" in control of the subject building and is located at 50 West 132<sup>nd</sup> Street, New York, NY 10037 and 1328 New York Avenue, Huntington Station 11746. <u>See id.</u>
- 51. Respondent HPD is tasked with enforcing the City's Housing Maintenance Code.
- 52. According to information listed on HPD's website, the subject building has seventy-two(72) class "A" dwelling units and is not a one or two family home. See id.

#### **LEGAL FRAMEWORK**

- 53. The Housing Part has jurisdiction to enforce state and local housing standards, including, but not limited to, the Housing Maintenance Code, Multiple Dwelling Law, Building Code, and Health Code, pursuant to New York City Civil Court Act Section 110(a).
- 54. An owner of a multiple dwelling must comply with the Housing Maintenance Code and has a duty to keep the premises in good repair. <u>See N.Y.C. Admin. Code § 27-2005</u>.
- 55. Tenants may complain about the repair issues in their building 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).
- 56. If a violation exists, the owner is required to correct the underlying condition and file a certification of compliance that the violation has been corrected prior to the certification date provided in the notice of violation. <u>See</u> N.Y.C. Admin. Code § 27-2115(h).
- 57. Indeed, "[f]ailure to file such certification of compliance shall establish a prima facie case that such violation has not been corrected." <u>See</u> N.Y.C. Admin. Code § 27-2115(f)(7).

- 58. For any non-hazardous conditions complained of by the tenants of a building, the Court may issue an Order to Correct if tenants have complained of a condition existing in the common areas or apartments of the building and no violation has been placed after thirty (30) days. See N.Y.C. Admin. Code § 27-2115(h).
- 59. 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. <u>See</u> N.Y.C. Admin. Code § 27-2115(i).
- 60. 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 timely certified that the repairs have been made. See N.Y.C. Admin. Code § 27-2115(h).
- 61. Any owner who violates the housing standards set forth in the Administrative Code of the City of New York 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).
- 62. However, for violations involving failure to maintain hot water, heat, or gas, the civil penalties are "not less than two hundred fifty nor more than five hundred dollars per day for each violation from and including the date the notice is affixed until the date the violation is corrected and not less than five hundred nor more than one thousand dollars per day for each subsequent violation." <u>See N.Y.C. Admin. Code § 27-2115(k)(1)(i)</u>.
- 63. The Housing Maintenance Code also bars landlords from harassing lawful occupants of their buildings. <u>See N.Y.C. Admin. Code § 27-2005(d)</u>.
- 64. Harassment consists of any act or omission that (a) causes or is intended to cause an occupant to vacate the unit or surrender or waive rights associated with their occupancy, and (b) falls within one of the categories enumerated in N.Y.C. Admin. Code § 27-2004(a)(48), including, but not limited to, repeated failures to correct hazardous or immediately hazardous violations, or "other repeated acts or omissions of such

significance as to substantially interfere with or disturb the comfort, repose, peace or quiet..." N.Y.C. Admin. Code § 27-2004(a)(48).

- 65. Except with respect to private dwellings, each of the acts listed in N.Y.C. Admin. Code § 27-2004(a)(48) creates a rebuttable presumption that such act was intended to cause an occupant to vacate the unit or surrender or waive tenancy rights. <u>Id.</u>
- 66. A finding of harassment requires placement of a class C immediately hazardous violation effective for the period during which the complained-of conduct occurred, and warrants imposition of the resulting penalties. <u>See N.Y.C.</u> Admin. Code § 27-2115(m).
- 67. Upon a finding of harassment, the Court will impose a civil penalty of at least \$2,000 but not more than \$10,000 for each affected dwelling unit. <u>Id.</u>
- 68. The Court will also award to each Petitioner compensatory damages or, at the election of the Petitioner, \$1,000, as well as reasonable attorneys' fees and costs. The Court may also award punitive damages. <u>See</u> N.Y.C. Admin. Code § 27-2115(o).
- 69. The Court may also issue an order restraining the landlord from further conduct that constitutes harassment and/or directing the landlord to ensure that no further harassment takes place. <u>See N.Y.C. Admin. Code § 27-2115(m)</u>.
- 70. Section 27-357(d) of the New York City Building Code provides that "[a]ll buildings in other than occupancy group A, mechanical and electrical equipment rooms and boiler and furnace rooms ... shall have at least one primary entrance accessible to and usable by individuals who use wheelchairs." N.Y.C. Admin. Code § 27-357(d).
- 71. Moreover, the New York City Building Code must be "liberally interpreted to secure the beneficial purposes thereof." N.Y.C. Admin. Code § 27-104.

## CONDITIONS AND VIOLATIONS

On information and belief, the basis of which is conversations with Petitioners and a review of the HPD Open Violations Page dated April 14, 2022, Respondent-landlords have not kept Petitioners' apartments or the common areas at the subject building in good repair as required by Section 27-2005(a) of the Housing Maintenance Code. See Exhibit A – HPD Open Violations Page Dated April 14, 2022.

- 73. On information and belief, the basis of which is conversations with Petitioners and a review of the HPD Open Violations Page dated April 14, 2022, there are conditions in Petitioners' apartments and the common areas of the subject building that are dangerous to Petitioners' life, health, and safety, and which constitute violations of the Housing Maintenance Code, Multiple Dwelling Law, Building Code, and/or Health Code. See id.
- 74. On information and belief, the basis of which is conversations with Petitioners, there is a building-wide gas outage that commenced on or about January 2022.
- 75. On information and belief, the basis of which is a search of publicly-available Department of Buildings databases, Respondent-landlords have not yet applied for a permit to do the necessary work to correct the building-wide gas outage.
- 76. On information and belief, the basis of which is conversations with Petitioners and a review of the HPD Open Violations Page, there are frequent outages of heat and hot water at the subject building. See also "Soundview tenants without heat for 2 weeks amid freezing temperatures" News12 The Bronx, January 15, 2022 (available at <a href="https://bronx.news12.com/soundview-tenants-without-heat-for-2-weeks-amid-freezing-temperatures">https://bronx.news12.com/soundview-tenants-without-heat-for-2-weeks-amid-freezing-temperatures</a>), attached hereto as Exhibit B.
- 77. On information and belief, the basis of which is a review of the HPD Open Violations Page dated April 14, 2022, there are 216 open Housing Maintenance Code violations at the subject building including 113 class B violations and 75 class C violations. See id.
- The HPD Open Violations Page dated April 14, 2022 is hereby incorporated by reference herein. <u>See id.</u>

#### A. Common Area Conditions

- 79. On information and belief, the basis of which is conversations with Petitioners, there are conditions in the common areas of the subject building, which threaten Petitioners' life, health, and safety and constitute violations of the Housing Maintenance Code, Building Code, and/or other laws regulating housing standards.
- 80. Such conditions include, but are not limited to, the following:
  - (1) Defective intercom at the building entrance;
  - (2) Dirty common hallways and stairwells throughout;

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- (3) Defective plaster in the 6<sup>th</sup> floor hallway;
- (4) Evidence of water leaks in  $6^{th}$  floor hallways.
- 81. On information and belief, the basis of which is conversations with Petitioners, Petitioners have repeatedly informed Respondent-landlords, or their agents, of the existence of these common area conditions.
- 82. On information and belief, the basis of which is conversations with Petitioners, Petitioners did not cause any of these common area conditions.

## **B.** Individual Apartment Conditions

- 83. On information and belief, the basis of which is conversations with Petitioners, there many conditions in Petitioners' individual apartments, which threaten Petitioners' life, health, and safety, and constitute violations of the Housing Maintenance Code, Building Code, and/or other laws regulating housing standards.
- 84. Such conditions include, but are not limited to, those listed in paragraphs eighty-five (85) to one hundred and twenty-five (125) below.

## Winifred Coulton (1H)

85. On information and belief, the basis of which is conversations with Petitioner Coulton, the conditions constituting violations in her apartment include:

- (1) Lack of cooking gas
- (2) Intercom defective
- (3) Defective floors throughout
- (4) Re-paint needed throughout apartment
- (5) Bathroom tiles damaged

## Martha Mateo (1C)

- 86. On information and belief, the basis of which is conversations with Petitioner Mateo, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Bathroom ceiling mold condition
  - (3) Bathroom Floor tiles defective

- (4) Living room wall near window frame - mold condition
- Bedroom door does not close properly (5)
- (6) Bedroom floor defective - sloping
- (7)Living room door does not close properly
- Living room floor defective sloping (8)
- Kitchen wall cabinets defective doors do not close (9)

## Sandra Canto (1D)

- 87. On information and belief, the basis of which is conversations with Petitioner Canto, the conditions constituting violations in her apartment include:
  - (1)Lack of cooking gas
  - (2)Intercom defective
  - Kitchen floor defective sloping (3)
  - Bedroom window frames defective (4)
  - (5) Bedroom wall – defective insulation
  - (6) Toilet does not flush properly

## Yudelka Mejia (1E)

- On information and belief, the basis of which is conversations with Petitioner Mejia, the 88. conditions constituting violations in her apartment include:
  - (1)Lack of cooking gas
  - (2)Intercom defective
  - Bathroom ceiling leak (3)
  - (4) Bathroom ceiling plaster damage
  - Kitchen floor defective (5)
  - (6) Cockroach infestation
  - (7)Mice infestation
  - (8) Kitchen electrical outlets do not work
  - (9) BR electrical outlets do not work
  - (10)Dining room electrical outlets do not work

- (11) Closet doorknobs defective
- (12) Living room floor uneven/sloping
- (13) Lack of hot water
- (14) BR window frames defective

## Angelina Diaz (1G)

- 89. On information and belief, the basis of which is conversations with Petitioner Diaz, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Holes in wall behind stove
  - (3) Defective floor in hallway

## Esperanza Vasquez (1L)

- 90. On information and belief, the basis of which is conversations with Petitioner Vasquez, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Intercom defective
  - (3) Bathroom ceiling leak
  - (4) Mold condition in bathroom
  - (5) Mold condition in bedroom
  - (6) Paint and plaster needed in entire apartment
  - (7) Leak in bedroom ceiling
  - (8) Defective plaster in bedroom ceiling
  - (9) Infestation of cockroaches
  - (10) Infestation of mice
  - (11) Defective floor tiles in living room
  - (12) Defective floor tiles in kitchen
  - (13) Kitchen sink cabinet rotten
  - (14) Kitchen sink faucet leak
  - (15) Defective bathroom outlet

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## Aurelia Martinez (2B)

- 91. On information and belief, the basis of which is conversations with Petitioner Martinez, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Intercom defective
  - (3) Bedroom paint peeling
  - (4) Missing doorknobs on bedroom door
  - (5) Bathroom floor entrance saddle missing
  - (6) Cockroach infestation

## Argentina Gonzalez (2C)

- 92. On information and belief, the basis of which is conversations with Petitioner Gonzalez, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Intercom defective
  - (3) Defective kitchen outlet does not work
  - (4) Holes behind stove where vermin enter
  - (5) Infestation of mice
  - (6) Leak at steam pipe in bedroom
  - (7) Leak at steam pipe in second bedroom
  - (8) Leak at steam pipe in bathroom
  - (9) Defective, cracked floor tiles in kitchen

#### Ashley Pagan (2D)

- 93. On information and belief, the basis of which is conversations with Petitioner Pagan, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Intercom defective
  - (3) BR- light fixture defective
  - (4) LR- light fixture defective

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- (5) Bathroom- mold condition
- (6) Bathroom- toilet sweats
- (7) Bathtub- re-glaze needed
- (8) Bathroom- medicine cabinet defective
- (9) Bathroom ceiling- paint/plaster needed
- (10) Bathroom- light fixture defective
- (11) Re-paint needed throughout
- (12) Bathroom door leak

#### Nidia Lopez (2E)

- 94. On information and belief, the basis of which is conversations with Petitioner Lopez, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Bathroom sink cabinet rotted from leaks

## **Raymond Garcia (2G)**

- 95. On information and belief, the basis of which is conversations with Petitioner Garcia, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) BR wood floor defective
  - (3) BR walls paint/plaster defective
  - (4) Bathtub needs reglaze
  - (5) Kitchen cabinets damaged
  - (6) Bathroom ceiling leak
  - (7) Bathroom ceiling plaster damage
  - (8) Cockroach infestation
  - (9) Mice infestation
  - (10) Entrance door needs re-paint
  - (11) BR door does not fit frame

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#### Zoila Escano (2H)

- 96. On information and belief, the basis of which is conversations with Petitioner Escano, the conditions constituting violations in her apartment include
  - (1) Lack of cooking gas
  - (2) Intercom defective
  - (3) LR light defective
  - (4) Bathroom- mold condition
  - (5) Lack of hot water

#### Nancy Duran (2J)

- 97. On information and belief, the basis of which is conversations with Petitioner Duran, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Intercom defective
  - (3) Bathroom- leak at steam riser
  - (4) Kitchen- leak at ceiling
  - (5) Kitchen- ceiling- paint/plaster defective
  - (6) Closet- water leak
  - (7) Closet- paint/plaster defective
  - (8) Lack of hot water
  - (9) LR- ceiling leak
  - (10) BR # 1- ceiling leak
  - (11) BR #2- ceiling leak
  - (12) Mice infestation

## Bernarda Portes (2K)

- 98. On information and belief, the basis of which is conversations with Petitioner Portes, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas

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- (2) Intercom defective
- (3) Bathtub re-glaze needed

## Tykima Jones (2L)

- 99. On information and belief, the basis of which is conversations with Petitioner Jones, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Bathroom- Mold condition at ceiling and walls
  - (3) Bathroom- leak at ceiling
  - (4) BR ceiling leak
  - (5) BR ceiling plaster defective
  - (6) BR ceiling- mold condition
  - (7) Entire apartment- wall plaster defective
  - (8) Hole behind stove where vermin come from
  - (9) Holes at baseboard throughout entire apartment
  - (10) Mice infestation
  - (11) Lack of hot water

## Tiffany Guity (3A)

- 100. On information and belief, the basis of which is conversations with Petitioner Guity, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Shower handles defective
  - (3) Bathroom ceiling plaster defective
  - (4) Kitchen re-painting needed
  - (5) Defective door at entrance to apartment
  - (6) Roach infestation
  - (7) Living room floor defective
  - (8) Smoke detector defective

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## Esvin Diaz (3B)

- 101. On information and belief, the basis of which is conversations with Petitioner Diaz, the conditions constituting violations in his apartment include:
  - (1) Lack of cooking gas
  - (2) Lack of hot water
  - (3) Kitchen radiator leaks
  - (4) Living room radiator leaks

## Lucia Mejia (3C)

- 102. On information and belief, the basis of which is conversations with Petitioner Mejia, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Intercom defective
  - (3) Bathroom ceiling plaster defective
  - (4) BR ceiling plaster defective
  - (5) Bathroom- leak at steam pipe riser
  - (6) Kitchen floor files defective
  - (7) Bathroom faucet loose
  - (8) Closet walls plaster defective
  - (9) Window frames defective

## Rodrigo Rojas (3D)

- 103. On information and belief, the basis of which is conversations with Petitioner Rojas, the conditions constituting violations in his apartment include:
  - (1) Lack of cooking gas
  - (2) Mice infestation
  - (3) Lack of hot water
  - (4) Kitchen ceiling- mold condition
  - (5) Kitchen ceiling- leak

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- (6) Kitchen ceiling- plaster damage
- (7) Bathroom heating pipe needs re-paint

## Marina Doble (3E)

- 104. On information and belief, the basis of which is conversations with Petitioner Doble the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Bathroom ceiling leak
  - (3) Bathroom wall mold condition
  - (4) Hole in bathroom wall around showerhead
  - (5) Bathtub re-glaze needed
  - (6) Bathtub caulking needed
  - (7) Hallway closet water leak
  - (8) Hallway closet plaster damage
  - (9) Mice infestation
  - (10) Cockroach infestation
  - (11) Entire apartment re-paint needed

## Brenda Irizarry (3H)

- 105. On information and belief, the basis of which is conversations with Petitioner Irizarry, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Intercom defective
  - (3) Refrigerator door gasket defective
  - (4) Refrigerator temperature control defective
  - (5) Freezer door gasket defective
  - (6) Bathroom wall tiles falling off
  - (7) BR #1- paint and plaster needed
  - (8) BR #2- paint and plaster needed
  - (9) Kitchen- saddle defective

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- (10) Hall floor defective
- (11) Hall- paint and plaster needed
- (12) Mold on window frames

#### Victor Gutierrez (3J)

- 106. On information and belief, the basis of which is conversations with Petitioner Gutierrez, the conditions constituting violations in his apartment include:
  - (1) Lack of cooking gas
  - (2) Intercom defective
  - (3) Entire apartment- Ceiling plaster/paint defective
  - (4) Entire apartment- Walls plaster/paint defective
  - (5) Dining room- floor defective sloping
  - (6) Kitchen sink cabinet defective
  - (7) Cockroach infestation
  - (8) Mold at bathroom walls
  - (9) Closet- leak
  - (10) Closet- mold condition
  - (11) Closet #2- leak
  - (12) Radiator valves defective

#### Faustina Santana (4A)

- 107. On information and belief, the basis of which is conversations with Petitioner Santana, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Bathroom wall- mold condition
  - (3) Bathroom wall tiles coming off
  - (4) LR ceiling plaster defective
  - (5) Kitchen sink- leak from faucet
  - (6) BR wall plaster defective
  - (7) BR ceiling plaster defective

<u>05/05/2022 03:16 PM</u>

- (8) BR ceiling leak
- (9) Cockroach infestation
- (10) Mice infestation
- (11) Hall floor defective- sloping
- (12) LR floor defective- sloping
- (13) Smoke alarm missing

## Olga Arzu (4B)

- 108. On information and belief, the basis of which is conversations with Petitioner Arzu, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) BR wood floor defective
  - (3) BR walls paint/plaster defective
  - (4) Bathtub needs reglaze
  - (5) Kitchen cabinets damaged
  - (6) Bathroom ceiling leak
  - (7) Bathroom ceiling plaster damage
  - (8) Cockroach infestation
  - (9) Mice infestation
  - (10) Entrance door needs re-paint
  - (11) BR door does not fit frame

## Zaida Ortiz (4C)

- 109. On information and belief, the basis of which is conversations with Petitioner Ortiz, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) BR paint and plaster needed
  - (3) Bathtub re-glaze needed

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## Ambar Sierra (4G)

- 110. On information and belief, the basis of which is conversations with Petitioner Sierra, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Intercom defective
  - (3) Rat infestation
  - (4) Mice infestation
  - (5) Cockroach infestation
  - (6) Bathroom- ceiling leak
  - (7) Bathroom- paint and plaster needed
  - (8) Bathroom- mold condition
  - (9) BR- mold condition near windows
  - (10) BR- ceiling leak
  - (11) LR- leak at ceiling
  - (12) LR- paint and plaster needed

## Miguel Ortega Torres (4I)

- 111. On information and belief, the basis of which is conversations with Petitioner Ortega Torres, the conditions constituting violations in his apartment include:
  - (1) Lack of cooking gas
  - (2) Bathtub needs re-glaze
  - (3) Toilet runs constantly
  - (4) Toilet sweats and leaks
  - (5) Kitchen outlet defective
  - (6) BR window frame defective
  - (7) Closet- plaster defective
  - (8) Cockroach infestation
  - (9) Mice infestation
  - (10) Electrical problems with frequent outages

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## Berkis Alvarez (4L)

- 112. On information and belief, the basis of which is conversations with Petitioner Alvarez, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Lack of hot water

## Thania Damiran (5D)

- 113. On information and belief, the basis of which is conversations with Petitioner Damiran, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Intercom defective
  - (3) Mice infestation
  - (4) BR wood floor defective
  - (5) Bathroom ceiling leak
  - (6) Bathroom ceiling paint and plaster needed
  - (7) Window frames defective throughout

## Cesar Marte (5E)

- 114. On information and belief, the basis of which is conversations with Petitioner Marte, the conditions constituting violations in his apartment include:
  - (1) Lack of cooking gas
  - (2) Intercom defective
  - (3) Kitchen sink drain leaking
  - (4) Kitchen faucet leaks
  - (5) Bathroom faucet leaks
  - (6) BR ceiling leaks
  - (7) LR ceiling leaks

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## Jose Figueroa (5G)

- 115. On information and belief, the basis of which is conversations with Petitioner Figueroa, the conditions constituting violations in his apartment include:
  - (1) Lack of cooking gas
  - (2) Cockroach infestation
  - (3) BR ceiling leaks
  - (4) Bathroom ceiling leaks
  - (5) Window frame defective
  - (6) Hall plaster defective
  - (7) LR floor defective
  - (8) Kitchen ceiling plaster defective
  - (9) LR ceiling plaster defective
  - (10) Hall wood floor defective

#### Gloria Guzman (5H)

- 116. On information and belief, the basis of which is conversations with Petitioner Guzman, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Intercom defective
  - (3) Kitchen- floor tiles breaking/defective
  - (4) Kitchen- wall plaster defective
  - (5) BR #1- Wood floor defective
  - (6) BR #2- Mold condition
  - (7) Bathroom light flickers

## Jhoanna Gonzalez (5I)

- 117. On information and belief, the basis of which is conversations with Petitioner Gonzalez, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas

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- (2) Intercom defective
- (3) BR ceiling leak
- (4) BR wall leak near window frame
- (5) BR wall mold condition
- (6) LR floor defective/sloping
- (7) Cockroach infestation

## **Bryant Wilson (5J)**

- 118. On information and belief, the basis of which is conversations with Petitioner Wilson, the conditions constituting violations in his apartment include:
  - (1) Lack of cooking gas
  - (2) Outlets defective throughout
  - (3) Light switches defective throughout
  - (4) Kitchen sink cabinet defective
  - (5) Kitchen wall cabinets defective
  - (6) Kitchen wall mold condition
  - (7) Kitchen floor is defective- sloping
  - (8) Mice infestation
  - (9) Hall closet- mold condition
  - (10) Ceiling leak closet by bathroom
  - (11) Bathroom sink is clogged
  - (12) Bathtub clogged
  - (13) LR wall plaster defective
  - (14) LR floors defective
  - (15) Bedroom floors defective
  - (16) Lack of hot water

## Lorraine Gaskin (6A)

119. On information and belief, the basis of which is conversations with Petitioner Gaskin, the conditions constituting violations in her apartment include:

23

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- (1) Lack of cooking gas
- (2) Lack of hot water

## **Reyes Muniz (6C)**

- 120. On information and belief, the basis of which is conversations with Petitioner Muniz, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Foyer- ceiling leak
  - (3) Apartment entrance door does not fit frame

#### Maria Mendez (6D)

- 121. On information and belief, the basis of which is conversations with Petitioner Mendez, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Bathtub re-glaze needed
  - (3) Bathroom mold condition
  - (4) Windows frames defective
  - (5) Entire apartment- re-paint needed
  - (6) Mice infestation
  - (7) Entrance door peephole defective

#### Juana Martinez (6F)

- 122. On information and belief, the basis of which is conversations with Petitioner Martinez, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas

#### Maria Davis (6G)

123. On information and belief, the basis of which is conversations with Petitioner Davis, the conditions constituting violations in her apartment include:

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(1) Lack of cooking gas

## Felicia Brito (6H)

- 124. On information and belief, the basis of which is conversations with Petitioner Brito, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Kitchen- ceiling leak
  - (3) Kitchen-ceiling plaster defective
  - (4) Mice infestation
  - (5) Kitchen- sink cabinet has holes
  - (6) Kitchen- outlet defective
  - (7) Entrance door frame cracked
  - (8) Window guards not installed
  - (9) Bathroom- mold at ceiling and walls
  - (10) BR wall- leak
  - (11) BR wall- mold condition
  - (12) BR- plaster damage

## Sandy Ramos (6L)

- 125. On information and belief, the basis of which is conversations with Petitioner Ramos, the conditions constituting violations in her apartment include:
  - (1) Lack of cooking gas
  - (2) Intercom defective
  - (3) Lack of hot water
  - (4) Entire apartment- plaster defective
  - (5) Kitchen sink- leak from drain pipe
  - (6) Bathtub clogged
- 126. On information and belief, the basis of which is conversations with Petitioners, Petitioners have told Respondent-landlords, or their agents, of the conditions in their homes and have made access to their homes liberally available since the conditions arose.

127. On information and belief, the basis of which is conversations with Petitioners, Petitioners did not cause any of the conditions in their apartments.

## HARASSMENT

- On information and belief, the basis of which is conversations with Petitioners, Respondent-landlords have harassed Petitioners.
- 129. Petitioners re-state and re-allege the allegations set forth in the paragraphs above.
- 130. On information and belief, the basis of which is a review of the HPD Open Violations Page dated April 14 2022, Respondent-landlords have repeatedly "fail[ed] to correct hazardous or immediately hazardous violations" in Petitioners' units "within the time required for such corrections." See N.Y.C. Admin. Code § 27-2004(a)(48)(b-2); Exhibit A – HPD Open Violations Page Dated April 14, 2022; specifically, as shown in the open HPD violations, repeated hazardous and immediately hazardous violations have not been timely corrected in Petitioner-tenants' apartments 1D, 1E, 1H, 2D, 2H, 3H, 4C, 4G, 5E, 5G, 5I, 5J, 6C and 6C.
- 131. Furthermore, Petitioner-tenants allege that Respondents have harassed them within the meaning of N.Y.C. Admin. Code § 27-2004(a)(48)(b) through "repeated interruptions or discontinuances of essential services, or an interruption or discontinuance of an essential service for an extended duration or of such significance as to substantially impair the habitability of such dwelling unit" to wit:

(1) The lack of cooking gas service which has been cut off since January 2022; lack of sufficient heat during heating season this past winter; and ongoing weekly instances of lack of hot water in Petitioners' apartments that has been occurring for at least the past year;

(2) Petitioners allege that the failure to provide these essential services has severely impacted the habitability of their apartments, where tenants have had to live with insufficient heat and dangerous alternative heating methods; have not been able to properly bathe due to not having hot water service in their bathrooms; and have not been able to prepare adequate healthy food for their families without cooking gas, which is particularly hard on tenants who are elderly, who require special diets and/or who have larger families.

- 132. Petitioners allege that such failures to correct violations and lack of essential services were "intended to cause [them] to vacate" their units or surrender or waive rights associated with their occupancies and, therefore, that such failures constitute harassment. N.Y.C. Admin. Code § 27-2004(a)(48).
- 133. Petitioners also allege that Respondent-landlords' neglect of the many conditions existing in the building – including frequent essential services outages, and lack of repairs of hazardous conditions – have substantially interfered with and/or disturbed their comfort, repose, peace or quiet, that such neglect was intended to cause Petitioners to vacate their units or surrender or waive rights associated with their occupancy, and, therefore, that such neglect constitutes harassment. See N.Y.C. Admin. Code §§ 27-2004(a)(48), (g).

## **PRIOR APPLICATION**

134. On information and belief, the basis of which is conversations with Petitioners, noPetitioner has made a prior application for similar relief.

WHEREFORE, Petitioners respectfully request that this Court issue an Order:

- (a) directing Respondents to correct the Housing Maintenance Code violations listed herein and in the attached exhibits within the time set for certifying the correction of such violations pursuant to Section 27-2115(c) of that Code or be subject to the civil penalties provided for by Section 27-2115(a) of that Code;
- (b) requiring Respondents, pursuant to Housing Maintenance Code Sections 27-2115 and 27-2121, to correct all violations of that Code that may arise in the subject apartments or the common areas of the subject building during the pendency of the proceeding;
- (c) directing Respondents, pursuant to New York City Civil Court Act Section 110(a), to correct the conditions listed herein and in the attached exhibits constituting violations of the Housing Maintenance Code, Multiple Dwelling Law, Building Code, or Health Code, within the time provided for by law;
- (d) imposing civil penalties on Respondent-landlords, pursuant to Section 27-2115(a) of the Housing Maintenance Code, for all Housing Maintenance Code violations for which

Respondent-landlords received notices of violation from HPD and for which the time for correction has already expired;

- (e) finding that Respondent-landlords harassed Petitioners in violation of Sections 27-2005(d) and 27-2004(a)(48) of the Housing Maintenance Code and imposing the appropriate penalties pursuant to Section 27-2115(m) of that Code;
- (f) enjoining Respondent-landlords from engaging in acts or omissions which constitute harassment under Section 27-2004(a)(48) of the Housing Maintenance Code;
- (g) awarding Petitioners, pursuant to Section 27-2115(o) of the Housing Maintenance Code, compensatory damages or \$1,000.00, reasonable attorneys' fees and costs, and punitive damages; and
- (h) granting Petitioners such other and further relief as this Court deems just and proper.
- Dated:

Bronx, New York April 14, 2022

much

Russell Crane, Of Counsel Benjamin Seibel, Of Counsel Tel: (646) 522-5847 Tel: (646) 689-5127 <u>rccrane@legal-aid.org</u> <u>bseibel@legal-aid.org</u>

Janet E. Sabel, Attorney-in-Chief Shervon Small, Attorney-in-Charge THE LEGAL AID SOCIETY Bronx Neighborhood Office 260 East 161<sup>st</sup> Street, 8<sup>th</sup> Floor Bronx, New York 10451 *Attorneys for Petitioners* 

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#### VERIFICATION

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

WINIFRED COULTON, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Sworn to before me this <u>1</u> day of April 2022

Notary Public



## **VERIFICATION**

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

Martha Mater , being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Martha Mater

Sworp to before me this  $2\sqrt{2}$  day of April 2022

In

Notary Public

RUSSELL CROME
Notary Public, State Compary York
No. 020R0210672
Qualified in Wesichester Crimity
Commission Expires March 25, 20,26

## VERIFICATION

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

SANDRA CANTO, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Sworn to before me this  $\underline{14^{44}}$  day of April 2022

Notary Public

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## VERIFICATION

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

YUDELKA MEJIA, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

YUDELKA MEJIA

Sworn to before me this <u>215</u> day of April 2022

Notary Public

RUSSELL CRANE Notary Public, State of New York No. 02CR6219572 Qualified in Westcher of County Commission Expires Million 22. 202-6

#### VERIFICATION

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

Angellina Diaz, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Myelina Diaz

Sworn to before me this <u>u</u> day of April 2022

Benjamin Seibel Notary Public, State of New York No. 02850304009 Qualifient in the County My commission at a cit 25 20 25

Benjamin Seibel Notary Public, State of New York No. 02SE6364909 Qualified in Kings County My commission expires Sept. 25, 20\_25
### **VERIFICATION**

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

ESPERANZA VASQUEZ, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Esperant

Sworn to before me this  $2!^{4}$  day of April 2022

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Nótary Public

RUSSELL CALLER Notary Public, State of Now York No. 02CR6219572 Qualified in Marchester Court Commission Expire: March 29, 2004

#### VERIFICATION

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

AURELIA MARTINEZ, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

AURELIA MARTINEZ

Swopn to before me this  $21^{4}$  day of April 2022

Notary

RUSSELLORD -Notary Public, State of New York No. 020R6219572 Qualified in Westchester County Commission Expires March 29, 20,26

# VERIFICATION

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

ARGENTINA GONZALEZ, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

02

Sworp to before me this day of April 2022

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Notary Public

Notary Public, State of New York No. 02CR3219572 Qualified in Westcher for Comfy Commission Expires Marca 20, 2026

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# VERIFICATION

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

ASHLEY PAGAN, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

agan

Sworn to before me this day of April 2022

Notary Public

RUSSELUM Notary Public, State of Mow York No. 02CR6216572 Qualified In Month Star County Commission Explicit March 29, 2024

#### VERIFICATION

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

NIDIA LOPEZ, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Sworn to before me this 26 day of April 2022

In

Nótary Public

RUSSELL CRANE Notary Public, State of New York No. 020R6219572 Qualified in Wastchester County Lawreiseon Counce Audice 49, 20,2-4

# VERIFICATION

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

RAYMOND GARCIA, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Sworp to before me this <sup>p4</sup>day of April 2022

lin Notary Public

RUSSELOP Notary Public, State of New York No. 02CR6219572 15 Commission Expires Inarch fill 2026

Comunication

## VERIFICATION

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

ZOILA ESCANO, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Sworn to before me this \_\_\_\_\_day of April 2022

Notary Public

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#### VERIFICATION

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

Nancy Duran, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

antig

Sworn to before me this  $14^{-4}$  day of April 2022

(1s

Notary Public

PUSSELL COLLE Notary Public, State of New York No. 02CR6219572 Qualified in Westchaster County Commission Expires March 29, 20,24

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# VERIFICATION

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

> BERN -**DEM**ARDA PORTES, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

BEMARDA PORTES BERN

Sworn to before me this <u>11</u> day of April 2022

Un

Notary Public

Constitution Constitution No. 62020219572 Constitution Constitution Constitution Constitution Constitution Constitution

#### **VERIFICATION**

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

1 y Kima ) meg, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Tukima Junes

Sworn to before me this <u>11</u> day of April 2022

III Notary Public

Current J. Control How You No. RECEDENT STR Current Sol In Works In the Control Commission Expired Autor Sol 1743

### VERIFICATION

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

Tiffant Gutt\_, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Tillant S

Sworn to before me this  $|\Psi|^{\uparrow}$  day of April 2022

Notary

Benjamin Seibel Notary Public, State of New York No. 02SE6364909 Qualified in Kings County My commission expires Sept. 25, 2025

## VERIFICATION

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

<u>Esvin</u> Diaz, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Esvin Diaz

Sworn to before me this  $2^{1/2}$  day of April 2022

Notary Public

CUCCELL CRANE L'deny Public, Onde ef Naw York No. 02078210572 Guellied in Contect of County Commission Contect of CO., 20, 20

# **VERIFICATION**

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

LUCIA MEJIA, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

LUCIA MEJIA

Sworn to before me this day of April 2022

Motary Public

Notary Francisco Ma. Quellifad in Contario 24 Committation - 24

### VERIFICATION

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

RODRIGO ROJAS, being duly swom deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

**RODRIGO ROJAS** 

Sworn to before me this 26<sup>th</sup>day of April 2022

Notary Public

RUSSELL COUNTE Notary Public, Diate of New York No. 02010/219572 Qualified in Westchester County Commission Exuines March 25, 20, 2-6

### VERIFICATION

STATE OF NEW YORK ) ss: COUNTY OF BRONX )

Marina Poble\_, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Marina Doble

Sworn to before me this <u>Z</u> day of April 2022

Notary Public

Notary Policy Quality of in schements - Champ Rommer Stein Training

#### VERIFICATION

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

BRENDA IRIZARRY, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

1 BRENDA RIZARRY

Sworn to before me this 19<sup>44</sup>day of April 2022

Notary Public

RUSSELL CH ME Notary Public, State of New York No. 02CR6219572 Qualified i: he County Commission 14:00 Ni 0129, 2026

#### VERIFICATION

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

VICTOR GUTIERREZ, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

erver VICTOR GUTIERREZ

Sworn to before me this  $\underline{14^{17}}$  day of April 2022

Notary Public

RUSSELL ORAN & Notary Public Concerns of Very York No. 0 Concerns County Concerns on a rock March 20, 20, 20

### VERIFICATION

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

FAUSTINA SANTANA, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Sworn to before me this  $76^{\mu}$  day of April 2022

rare

Notary Public

RUSSELL ORANG Notary Public, State of New Yor, No. 02CR6219572 Qualified in Westchester County Commission Expine Atomic or 2026

### VERIFICATION

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

OLGA ARZU, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Sworn to before me this 1407 day of April 2022

RUST FLOOD AND York Notory Public Control Online York No. 020P6219572 Clar Machine he Control And No. 01201 20226

INDEX NO. LT-311501-22/BX RECEIVED NYSCEF: 05/03/2022

#### VERIFICATION

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

ZAIDA ORTIZ, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

ZAIDA

Sworn to before me this 14th day of April 2022

Notary Public

L Benjamin Seibel Notary Public, State of New York No. 02SE6364909 Qualified in Kings County My commission expires Sept. 25. 20 25

INDEX NO. LT-311501-22/BX RECEIVED NYSCEF: 05/03/2022

### VERIFICATION

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

AMBAR SIERRA, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

AMBAR SIERRA

Sworn to before me this day of April 2022

Benjamin Seibel Notary Public, State of New York No. 02SE6364909 Qualified in Kings County My commission expires Sept. 25. 20.25

INDEX NO. LT-311501-22/BX RECEIVED NYSCEF: 05/03/2022

# VERIFICATION

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

MIGUEL ORTEGA TORRES, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

17U1 Olipa

Sworn to before me this <u>14</u><sup>↑</sup> day of April 2022

otary Public

Benjamin Seibel Notary Public, State of New York No. 02SE6364909 Qualified in Kings County My commission expires Sept. 25, 20<u>25</u>

## VERIFICATION

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

> BERNUS BELKY'S ALVAREZ, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

- almenes BELKYS ALVAREZ BERKIS

Sworn to before me this  $21^{2}$  day of April 2022

Notary Public

RUSSELLO '0\\' 2 Notary Publi No. 0 Col

INDEX NO. LT-311501-22/BX RECEIVED NYSCEF: 05/03/2022

# VERIFICATION

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

THANIA DAMIRAN, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Sworn to before me this 44 day of April 2022

Notary Public

Benjamin Seibel Notary Public States (New York No. 015 (Control - New York Qualified in Kings Control My commission excircs Sent 1.5 no.25

# VERIFICATION

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

CESAR MARTE, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Cesz/AmantE

Sworn to before me this  $2 \not\models$  day of April 2022

Notary Public

RUSSELLCI Notary Public, State	
No. 0202021	19572
Ovalified I	19572
Dommission	20 <u>2-</u>

#### VERIFICATION

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

<u>Jose Figueroa</u>, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

JOSÉAFIGUENOA JoseFiguenoa

Sworn to before me this 14<sup>th</sup> day **9**f April 2022

Public Notar

Benjamin Selbel Notary Public, State of New York No. 02SE6364909 Oualified in Kings County My commission expires Sept. 25, 20.25

INDEX NO. LT-311501-22/BX RECEIVED NYSCEF: 05/03/2022

# VERIFICATION

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

<u>Glovia Gizman</u>, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Aloria Guzman

Sworn to before me this  $|4^{h}|$  day of April 2022

Benjamin Seihel Nother Enhlip Statter New York 1990 J2SEr Set 1999 Fendlied in Kelas County My commission expires Sept 25, 20.25

# VERIFICATION

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

JHOANNA GONZALEZ, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

JHOANNA GONZALEZ

Sworn to before me this  $14^{h}$  day of April 2022

Notary

Benvamin Selbel Notary Public, State of New York No. 02SE6364909 Qualified in Kings County My commission expires Sept. 25, 2025

## VERIFICATION

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

BRYANT WILSON, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

BRYANT WILSON

Notary **P***ú*blic

Benjamin Selbel Notary Public, State of New York No. 02SE6364909 Qualified in Kings County My commission expires Sept. 25, 2025

# VERIFICATION

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

LORRAINE GASKIN, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Sworn to before me this 44 day of April 2022

Notary Public

Benjamin Seibel Notary Public, State of New York No. 02SE6364909 Qualified in Kings County My commission expires Sept. 25, 20\_25

#### VERIFICATION

STATE OF NEW YORK ) ss: COUNTY OF BRONX

REYES MUNIZ, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

REYES MUNIZ

Sworn to before me this 14<sup>4</sup> day of April 2022

Notary Public

Benjamin Seibel otary Public, State of New York No. 02SE6364909 Qualified in Kings County My commission expires Sept. 25, 2025

# VERIFICATION

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

MARIA MENDEZ, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Sworn to before me this  $(4^{\text{M}} \text{ day of April 2022})$ 

Notary Public

Notary Public, State of New York No. 025E6364909 Qualified in Kings County My commission expires Sept. 25, 20<u>2</u>

# VERIFICATION

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

Trava Martney, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Juana Martinez

Sworn to before me this <u>(4)</u> day of April 2022

Notary Public

Benjamin Seibel Notary Public, State of New York No. 02SE6364909 Qualified in Kings County My commission expires Sept. 25, 20**25** 

### VERIFICATION

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

Maria Davis, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Maria Davis

Sworn to before me this 26 day of April 2022

Notary Public

RUSSELL CRAME Notary Public, State of New York No. 02CR6219572 Qualified in Mint tohester County Commission (2000) - March 25, 2026

## VERIFICATION

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

FELICIA BRITO, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

FELICIA BRIT

Sworn to before me this  $24^{44}$  day of April 2022

In

Notary Public

RUSSELL CRANE Notary Public, State of New York Not 020R6219572 Qualified in Wastehaster County Commission Explanation County

### VERIFICATION

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

Sandy Ramos, being duly sworn deposes and says:

I am a petitioner in this proceeding. I have had the petition read to me and know the truth of the contents thereof pertaining to the building as a whole and my individual apartment, except as to those matters alleged to be on information and belief, and as to those matters, I believe them to be true.

Sandy Lanos

Sworn to before me this

Motary Public

Contribution Unide and

26
NYSCEF DOC. NO. 1

INDEX NO. LT-311501-22/BX RECEIVED NYSCEF: 05/03/2022

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

-----Х

WINIFRED COULTON, Et Al.

Petitioners,

Index No.

### -against-

## AFFIRMATION OF TRANSLATION

PATBRU REALTY CO LLC, Et Al.,

Respondent-Landlords,

## THE NEW YORK CITY DEPARTMENT OF HOUSING PRESERVATION AND DEVELOPMENT,

Respondent.

**RUSSELL CRANE**, hereby affirms, under penalty of perjury:

1. I am of counsel to the Legal Aid Society, who are attorneys for Petitioner-tenants Winifred Coulton, et al. herein.

2. I speak English and Spanish fluently.

3. On April 14, 2022, I verbally translated the Verified Petition and Verifications in the above captioned case from English into Spanish for Petitioners, Sandra Canto, Yudelka Mejia, Zoila Escano, Nancy Duran, Bernarda Portes, Lucia Mejia, Olga Arzu, and Sandy Ramos.

4. On April 21, 2022, I verbally translated the Verified Petition and Verifications in the above captioned case from English into Spanish for Petitioners, Martha Mateo, Esperanza Vasquez, Aurelia Martinez, Marina Doble, Berkis Alvarez, Cesar Marte, and Felicia Brito.

5. On April 26, 2022, I verbally translated the Verified Petition and Verifications in the above captioned case from English into Spanish for Petitioners Nidia Lopez, Rodrigo Rojas, and Faustina Santana.

6. The above Petitioners referenced in paragraphs three, four and five are all primarily Spanish speakers.

7. Before signing the Verification, Petitioners each agreed the contents within the aforesaid documents were true as to matters in which he or she had personal knowledge, and as to matters he or she knew upon information and belief, he or she believed those matters to be true.

Dated: April 29, 2022 Bronx, New York

hund (may

**RUSSELL CRANE** 

NYSCEF DOC. NO. 1

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

-----Х

WINIFRED COULTON, Et Al.

Petitioners,

Index No.

### -against-

## AFFIDAVIT OF TRANSLATION

PATBRU REALTY CO LLC, Et Al.,

Respondent-Landlords,

## THE NEW YORK CITY DEPARTMENT OF HOUSING PRESERVATION AND DEVELOPMENT,

Respondent.

STATE OF NEW YORK ) : SS COUNTY OF BRONX )

Brianda Guzman, being duly sworn, deposes and says:

1. I am a paralegal employed by the Legal Aid Society, who are attorneys for Petitioner-tenants Deborah Smith, et al. herein.

2. I speak English and Spanish fluently.

3. On April 14, 2022, I verbally translated the Verified Petition and Verifications in the above captioned case from English into Spanish for Petitioners Angelina Diaz, Zaida Ortiz, Ambar Sierra, Thania Damiran, Jose Figueroa, Gloria Guzman, Reyes Muniz, Maria Mendez, and Juana Martinez.

4. The above Petitioners referenced in paragraphs three are all primarily Spanish speakers.

5. Before signing the Verification, Petitioners each agreed the contents within the aforesaid documents were true as to matters in which he or she had personal knowledge, and as

to matters he or she knew upon information and belief, he or she believed those matters to be

true.

3 Dated: May 2022 Bronx, New York

## **BRIANDA GUZMAN**

Sworn to before me this  $\frac{2}{3}$  day of May 2022

Mund um NOTARY PUBLIC Russell Crane Notary Public, State of New York Registration No. 02CR6219572 Qualified inWestchester County Commission Expires 3/29/2026

## **EXHIBIT** A

		/IL COU	RT -	L&T	- PEN	DING			INDE	X NO	). LT-31
4/22_4:28 PM EF DOC. NO	. 3					HPD Buil	ding In	fo	RECEIVI	ED 1	IYSCEF:
											4/14/2022 06162
			HPD B	uilding, Re	egistration 8	& Violation	Serv	ices Select	🗸 <u>Ho</u>	<u>me</u>	
The selected ad	dress: 134	19 STRATFO	RD AVE	NUE, Bro	onx 10472	2					
This building I	has filed r	ecords with	the Ne	w York S	State Divi	sion of H	ousin	g and Comr	nunitv Rer	iewa	al at
east one time											
IPD# 11995 Active	Range 1349-1349	Block Lot 03866 0049			Stories A 6 72		Units	Ownership PVT	Registration# 200630	ŧ	Class B
ther Units											
roperty			В	uilding I	Registrat	ion Sum	mary	/ Report			
wner egistration nformation	Find Apa	rtment#		Clea	ar Sea	rch					
harges	Owner	Last Reg Dt Reg Expire Dt	Organiz	ation	Last Nm	First Nm	House No	Street Nm Ap	t City	State	e Zip
<u>Complaint</u> Status	Head Officer	12/17/2021 09/01/2022			ROONEY	MICHAEL	1328	NEW YORK AVENUE	Huntingtor Station	NY	11746
<u>Complaint</u> History	Officer	12/17/2021 09/01/2022			ROONEY JR.	' MICHAEL	1328	NEW YORK AVENUE	Huntingtor Station	NY	11746
<u>Litigation/Case</u> Status	Corporatio	n 12/17/2021 09/01/2022	PATBRU CO, LLO	I REALTY			1328	NEW YORK AVENUE	Huntingtor Station	NY	11746
<u>Tenant</u> Harassment Report	Managing Agent	12/17/2021 09/01/2022	CONCO MANAG NY, LLC	EMENT OF	ROONEY JR.	MICHAEL	50	WEST 132ND STREET	New York	NY	10037
/iolations prior year Open Viol.'s Ecertification	There an 75 I cla For Defi	olations - A re 216 Viola ass: 0 nitions of t located at t	ntions. he colu	Arrango mns inc	dicated b						class: vices
Overdue Lead	To sort	the column	s click	on thei	ir underli	ined hea	ders	below in t	he blue a	rea	
Paint Viol. Correction Vacate Orders	Apt Story	Reported Hzro Date, Clas nov ISSUED	-	Violation ID, NOV ID, NOV	Violation D				Status Status Date		Certify By Date Actual Cert. Date
<u>I-Card</u> Images	1E	Date 2022/04/07 C 2022/04/11	742 *		of gas to the	e fixtures at pt 1e, 1st st	range i	n adequate sup in the kitchen d apartment fro	2022/0		2022/04/24
PROS Online		2022/04/07 C 2022/04/11	742 *		§ 27-2070 a of gas to the located at a	adm code pr e fixtures at pt 3f, 3rd st	range i	n adequate sup in the kitchen I apartment froi	2022/0		2022/04/24
Bed Bugs	3F	2022/04/07 B	508	15103900	north at eas		pair the	e broken or defe	ective NOV SE	INT	2022/05/30
<u>1ap</u>		2022/04/11		7870807 Original	plastered su ceiling in th	Irfaces and p	paint in cated at	a uniform color apt 3f, 3rd sto	at 2022/0		, ,
		2022/04/07 B 2022/04/11	508	15103901 7870807 Original	plastered su ceiling in th	Irfaces and p	, paint in located	e broken or defe a uniform color at apt 3f, 3rd s ast	at 2022/0		2022/05/30
		2022/04/07 C 2022/04/11	742 *		of gas to the	e fixtures at pt 5a, 3rd si	range i	n adequate sup in the kitchen h apartment fro	2022/0		2022/04/24
		2022/04/07 C 2022/04/11	742 *		§ 27-2070 a	adm code pr		n adequate sup in the kitchen	ply NOV SE 2022/0		2022/04/24

https://hpdonline.hpdnyc.org/HPDonline/select\_application.aspx

INDEX NO. LT-311501-22/BX

)5/03/2022

'ILED: BRON	IX (	CIVIL COU	RT -	L&T	- PENDING	INDEX N	10. LT-3
4/14/22 4:28 PM YSCEF DOC. NO.	3				HPD Building Info RI located at apt 5e, 5th story, 2nd apartment from	ECEIVED	NYSCEF:
					south at west		
	5E 5	2022/04/07 B 2022/04/11	505	15103907 7870808 Original	<sup>7</sup> § 27-2005 adm code replace with new the broken or defective base cabinet under sink in the kitchen located at apt 5e, 5th story, 2nd apartment from south at west	NOV SENT 2022/04/11	2022/05/30
	5E 5	2022/04/07 B 2022/04/11	502	15103908 7870808 Original	§ 27-2005 adm code properly repair with similar material the broken or defective vinyl tiles floor throughout in the entire apartment located at apt 5e, 5th story, 2nd apartment from south at west	NOV SENT 2022/04/11	2022/05/30
	5G 5	2022/04/07 C 2022/04/11	742 *	15103913 7870820 Original	§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen located at apt 5g, 5th story, 4th apartment from north at east	NOV SENT 2022/04/11	2022/04/24
	1	2022/04/07 C 2022/04/11	530	15103916 7870828 Original	§ 27-2005, 2007, 204.1 hmc code: arrange and make self-closing the doors at building entrance , 1st story	NOV SENT 2022/04/11	2022/05/12
	5J 5	2022/04/07 C 2022/04/11	742 *		§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen located at apt 5j, 5th story, 1st apartment from south at west	NOV SENT 2022/04/11	2022/04/24
	5J 5	2022/04/07 B 2022/04/11	508	15103921 7870809 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 5j, 5th story, 1st apartment from south at west	2022/04/11	
	5J 5	2022/04/07 B 2022/04/11	502	15103923 7870809 Original	§ 27-2005 adm code properly repair with similar material the broken or defective porcelain enamel at bathtub in the bathroom located at apt 5j, 5th story, 1st apartment from south at west	NOV SENT 2022/04/11	2022/05/30
	6K 6	2022/04/07 C 2022/04/11	742 *	15103929 7870815 Original	§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen located at apt 6k, 6th story, 2nd apartment from south at west	NOV SENT 2022/04/11	2022/04/24
	6K 6	2022/04/07 B 2022/04/11	702	15103930 7870806 Original	§ 27-2045 adm code repair or replace the smoke detector defective in the entire apartment located at apt 6k, 6th story, 2nd apartment from south at west	NOV SENT 2022/04/11	2022/05/3
	6K 6	2022/04/07 B 2022/04/11	1503	15103931 7870806 Original	§ 27-2046.1 hmc: repair or replace the carbon monoxide detecting device(s). defective in the entire apartment located at apt 6k, 6th story, 2nd apartment from south at west	NOV SENT 2022/04/11	2022/05/3
	6K 6	2022/04/07 B 2022/04/11	505		§ 27-2005 adm code replace with new the broken or defective door at entrance in the bathroom located at apt 6k, 6th story, 2nd apartment from south at west	NOV SENT 2022/04/11	2022/05/30
	6K 6	2022/04/07 A 2022/04/11	554	15103933 7870804 Original	§ 27-2005 adm code paint metal in accordance with dept. regulation the steam riser in the bathroom located at apt 6k, 6th story, 2nd apartment from south at west	NOV SENT 2022/04/11	2022/07/29
	6K 6	2022/04/07 B 2022/04/11	508	15103934 7870806 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling in the 4th room from east located at apt 6k, 6th story, 2nd apartment from south at west	2022/04/11	
	6K 6	2022/04/07 C 2022/04/11	510	15103935 7870815 Original	§ 27-2005 adm code & 309 m/d law abate the nuisance consisting of padlock with latch installed at door leading to the fire escape exit in the 4th room from east located at apt 6k, 6th story, 2nd apartment from south at west	NOV SENT 2022/04/11	2022/04/24
	5D 5	2022/04/07 C 2022/04/11	742 *	15103936 7870822 Original	§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen located at apt 5d, 5th story, 1st apartment from north at east	NOV SENT 2022/04/11	2022/04/24
	5D 5	2022/04/07 B 2022/04/11	508	15103937 7870810 Original	<sup>7</sup> § 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling in the kitchen located at apt 5d, 5th story, 1st apartment from north at east	NOV SENT 2022/04/11	
	4G 4	2022/04/07 C 2022/04/11	569	15103942 7870827 Original	hmc adm code: § 27-2017.4 abate the infestation consisting of mice in the entire apartment located at apt 4g, 4th story, 4th apartment from north at east	NOI SENT 2022/04/11	2022/05/1
	4G 4	2022/04/07 B 2022/04/11	702	15103943 7870811 Original	§ 27-2045 adm code repair or replace the smoke detector defective in the entire apartment located at apt 4g, 4th story, 4th apartment from north at east	NOV SENT 2022/04/11	2022/05/3
	4G 4	2022/04/07 B 2022/04/11	1503	15103944 7870811 Original	§ 27-2046.1 hmc: repair or replace the carbon monoxide detecting device(s). defective in the entire apartment located at apt 4g, 4th story, 4th apartment from north at east	NOV SENT 2022/04/11	2022/05/3
	4G 4	2022/04/07 C 2022/04/11	742 *		§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen	NOV SENT 2022/04/11	2022/04/24

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ILED: BRON		VIL COU	RT -	L&T	PENDING HPD Building Info		10. LT-3
4/14/22_4:28 PM SCEF DOC. NO.	3			Original	located at apt 4g, 4th story, 4th apartment from	ECEIVED	NYSCEF:
	4G 4	2022/04/07 B 2022/04/11	508	15103946 7870811 Original	north at east § 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 4g, 4th story 4th apartment from north at east	2022/04/11	
	4G 4	2022/04/07 B 2022/04/11	508	15103947 7870811 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at east and south wall in the 3rd room from east located at apt 4g, 4th story, 4th apartment from north at east	e NOV SENT 2022/04/11	
	3E 3	2022/04/07 C 2022/04/11	742 *		§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen located at apt 3e, 3rd story, 2nd apartment from north at east	NOV SENT 2022/04/11	2022/04/24 L
	3E 3	2022/04/07 C 2022/04/11	510		§ 27-2005 adm code & 309 m/d law abate the nuisance consisting of key operated lock installed at door leading to the fire escape exit in the 1st room from east located at apt 3e, 3rd story, 2nd apartment from north at east	NOV SENT 2022/04/11	2022/04/24 L
	3E 3	2022/04/07 B 2022/04/11	550		§ 27-2017.3 hmc: trace and repair the source and abate the visible mold condition at ceiling and south wall approx. 10 sq.ft in the bathroom located at apt 3e, 3rd story, 2nd apartment from north at east	2022/04/11	
	3E 3	2022/04/07 B 2022/04/11	508		§ 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 3e, 3rd story, 2nd apartment from north at east	2022/04/11	
	3E 3	2022/04/07 B 2022/04/11	502		§ 27-2005 adm code properly repair with similar material the broken or defective caulking around o bathtub in the bathroom located at apt 3e, 3rd story, 2nd apartment from north at east		2022/05/30 L
	3E 3	2022/04/07 B 2022/04/11	502		§ 27-2005 adm code properly repair with similar material the broken or defective vinyl tiles floor in the kitchen located at apt 3e, 3rd story, 2nd apartment from north at east	NOV SENT 2022/04/11	2022/05/30 L
	3E 3	2022/04/07 B 2022/04/11	508		§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling in the kitchen located at apt 3e, 3rd story, 2nd apartment from north at east	e NOV SENT 2022/04/11	
	3D 3	2022/04/07 C 2022/04/11	742 *		§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen located at apt 3d, 3rd story, 1st apartment from north at east	NOV SENT 2022/04/11	2022/04/24 L
	3D 3	2022/04/07 C 2022/04/11	790	15103969 7870826 Original	§ 27-2043.1 hmc install the missing or repair/replace the defective window guard(s) in accordance with the specifications of the new york city health code section 24 rcny chapter 12. wg to install = 2; wg to replace = 0; wg to repair = 0; in the entire apartment located at apt 3d, 3rd story, 1st apartment from north at east	2022/04/11	2022/05/12 I
	3D 3	2022/04/07 B 2022/04/11	583	15103970 7870813 Original	§ 27-2026, 2027 hmc: properly repair the source and abate the evidence of a water leak at ceiling ir the kitchen located at apt 3d, 3rd story, 1st apartment from north at east		2022/05/30 L
	3D 3	2022/04/07 A 2022/04/11	550	15103971 7870805 Original	§ 27-2017.3 hmc: trace and repair the source and abate the visible mold condition at ceiling approx. 3 sq.ft in the kitchen located at apt 3d, 3rd story, 1st apartment from north at east	2022/04/11	2022/07/29 L
	3K 3	2022/03/28 C 2022/03/29	664	15068430 7856724 Original	§ 27-2028, 2032 adm code provide an adequate supply of heat from an approved central heating system, or an approved system of gas or electrical heating in good operating condition for the dwellin unit in the 2nd room from east located at apt 3k, 3rd story, 2nd apartment from south at west , section "south"		2022/04/10 2022/04/05 5
	3K 3	2022/03/28 C 2022/03/29	510	15068431 7857236 Original	§ 27-2005 adm code & 309 m/d law abate the nuisance consisting of hot water temp. exceeding 130 degrees in the entire apartment located at apt 3k, 3rd story, 2nd apartment from south at west , section "south"	CIV14 MAILED 2022/04/06	2022/04/11 2022/04/05 5
	3K 3	2022/03/28 C 2022/03/29	742 *	15068432 7857236 Original	§ 27-2070 adm code provide an adequate supply of gas to the fixtures in the kitchen located at ap 3k, 3rd story, 2nd apartment from south at west , section "south"	NOV SENT t 2022/03/29	
	All Stories	2022/03/28 C 2022/03/29	791	15068433 7857238 Original	§ 27-2043.1 hmc install the missing or repair/replace the defective window guard(s) throughout the public areas in accordance with the	NOV SENT 2022/03/29	

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				specifications of the new york city health code section 24 rcny chapter 12.		
Fire Escape	2022/03/28 C 2022/03/29	513 *	15068434 7857237 Original	§ 27-2005 adm code fire escape defective. adjust the dropladder so that it will slide easily in the guide rods at front at fire escape	NOV CERT 2022/04/11	
1D 1	2022/03/28 B 2022/03/29	502	15075946 7857234 Original	§ 27-2005 adm code properly repair with similar material the broken or defective wood underlayment at floor in the kitchen located at apt 1d, 1st story, 1st apartment from north at east	NOV SENT 2022/03/29	
1D 1	2022/03/28 A 2022/03/29	502	15075947 7857233 Original	§ 27-2005 adm code properly repair with similar material the broken or defective vinyl tiles at floor in the kitchen located at apt 1d, 1st story, 1st apartment from north at east	NOV SENT 2022/03/29	
1D 1	2022/03/28 C 2022/03/29	742 *	15075948 7857235 Original	§ 27-2070 adm code provide an adequate supply of gas to the fixtures gas range in the kitchen located at apt 1d, 1st story, 1st apartment from north at east	NOV SENT 2022/03/29	
1D 1	2022/03/28 C 2022/03/29	664	15075949 7856724 Original	§ 27-2028, 2032 adm code provide an adequate supply of heat from an approved central heating system, or an approved system of gas or electrical heating in good operating condition for the dwelling unit in the entire apartment located at apt 1d, 1st story, 1st apartment from north at east	CIV14 MAILED 2022/04/07	2022/04/3 2022/04/0
1D 1	2022/03/28 C 2022/03/29	670 *	15075950 7856724 Original	§ 27-2031 adm code provide hot water at all hot water fixtures in the entire apartment located at apt 1d, 1st story, 1st apartment from north at east	CIV14 MAILED 2022/04/07	2022/04/1 2022/04/0
3K 3	2022/03/23 B 2022/03/24	508	15065664 7851694 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at south wall in the kitchen located at apt 3k, 3rd story, 2nd apartment from south at west	CIV14 MAILED 2022/04/06	2022/05/2 2022/04/0
3K 3	2022/03/23 C 2022/03/24	742 *	15065665 7851695 Original	§ 27-2070 adm code provide an adequate supply of gas to the fixtures at gas range in the kitchen located at apt 3k, 3rd story, 2nd apartment from south at west	NOV SENT 2022/03/24	
3H 3	2022/03/23 C 2022/03/24	664	15065666 7851144 Original	§ 27-2028, 2032 adm code provide an adequate supply of heat from an approved central heating system, or an approved system of gas or electrical heating in good operating condition for the dwelling unit in the entire apartment located at apt 3h, 3rd story, 5th apartment from north at east	CIV14 MAILED 2022/04/06	2022/04/0 2022/04/0
3H 3	2022/03/23 C 2022/03/24	670 *	15065667 7851144 Original	§ 27-2031 adm code provide hot water at all hot water fixtures in the entire apartment located at apt 3h, 3rd story, 5th apartment from north at east	CIV14 MAILED 2022/04/06	2022/04/0 2022/04/0
3H 3	2022/03/23 C 2022/03/24	742 *	15065668 7851696 Original	$\S$ 27-2070 adm code provide an adequate supply of gas to the fixtures no cooking gas at gas range in the kitchen located at apt 3h, 3rd story, 5th apartment from north at east	NOV SENT 2022/03/24	2022/04/0
1G 1	2022/03/10 B 2022/03/14	742 *	15035481 7823772 Original	§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the entire apartment located at apt 1g, 1st story, 1st apartment from east at south	NOV SENT 2022/03/14	
6F 6	2022/02/24 C 2022/03/02	742 *	14943768 7752219 Original	§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen located at apt 6f, 6th story, 3rd apartment from north at east	NOV SENT 2022/03/02	
4J 4	2022/02/24 C 2022/03/02	530	14943784 7752235 Original	§ 27-2005, 2007, 204.1 hmc code: arrange and make self-closing the doors in the entrance located at apt 4j, 4th story, 1st apartment from south at west	CIV14 MAILED 2022/04/04	2022/04/0 2022/04/0
4] 4	2022/02/24 C 2022/03/02	742 *	14943786 7752220 Original	§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen located at apt 4j, 4th story, 1st apartment from south at west	NOV SENT 2022/03/02	
4] 4	2022/02/24 A 2022/03/02	556	14943787 7752203 Original	§ 27-2013 adm code paint with light colored paint to the satisfaction of this department the ceiling in the bathroom located at apt 4j, 4th story, 1st apartment from south at west	NOV SENT 2022/03/02	
4] 4	2022/02/24 B 2022/03/02	502	14943790 7752210 Original	§ 27-2005 adm code properly repair with similar material the broken or defective ceramic tiles at window frame in the bathroom located at apt 4j, 4th story, 1st apartment from south at west	NOV SENT 2022/03/02	
4J 4	2022/02/24 B 2022/03/02	508	14943798 7752210 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 4j, 4th story, 1st apartment from south at west	NOV SENT 2022/03/02	2022/04/2
5F 5	2022/02/24 B 2022/03/02	702	14943809 7752211	§ 27-2045 adm code repair or replace the smoke detector missing in the entire apartment located at apt 5f, 5th story, 3rd apartment from north at east		2022/04/2 2022/04/0

https://hpdonline.hpdnyc.org/HPDonline/select\_application.aspx

		CIVIL COUR	т –	L&T	- PENDING HPD Building Info		10. LT-31
22_4:28 PM DOC. NO.	3 5	2022/03/02		7752211 Original	monoxide detecting device(s). missing in the entire apartment located at apt 5f, 5th story, 3rd apartment from north at east		NYSCEF: 2022/04/05
	5F 5	2022/02/24 C 2022/03/02	742 *		§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen located at apt 5f, 5th story, 3rd apartment from north at east	NOV SENT 2022/03/02	2022/03/15
	5A 5	2022/02/24 C 2022/03/02	742 *		§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen located at apt 5a, 5th story, 4th apartment from south at west	NOV SENT 2022/03/02	2022/03/15
	5A 5	2022/02/24 A 2022/03/02	550		§ 27-2017.3 hmc: trace and repair the source and abate the visible mold condition at east wall approx. 4 sq.ft in the 1st room from east located at apt 5a, 5th story, 4th apartment from south at west	NOI SENT 2022/03/02	2022/06/19
	5A 5	2022/02/24 A 2022/03/02	550		§ 27-2017.3 hmc: trace and repair the source and abate the visible mold condition at ceiling and north wall approx. 5 sq.ft in the bathroom located at apt 5a, 5th story, 4th apartment from south at west	NOI SENT 2022/03/02	
	5A 5	2022/02/24 B 2022/03/02	502		§ 27-2005 adm code properly repair with similar material the broken or defective porcelain enamel at bathtub in the bathroom located at apt 5a, 5th story, 4th apartment from south at west	CIV10 MAILED 2022/04/11	2022/04/20 2022/03/30
	6C 6	2022/02/24 C 2022/03/02	742 *		§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen located at apt 6c, 6th story, 6th apartment from south at west	NOV SENT 2022/03/02	2022/03/15
	6C 6	2022/02/24 B 2022/03/02	579		§ 27-2026 adm code repair the leaky and/or defective faucets at sink in the kitchen located at apt 6c, 6th story, 6th apartment from south at west	1 NO ACCESS 2022/04/08	2022/04/20 2022/03/30
	6C 6	2022/02/24 B 2022/03/02	508	14943874 7752213 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at south wall in the kitchen located at apt 6c, 6th story, 6th apartment from south at west	1 NO ACCESS 2022/04/08	2022/04/20 2022/03/30
	6C 6	2022/02/24 B 2022/03/02	508		$\S$ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at north and east wall in the private hallway located at apt 6c, 6th story, 6th apartment from south at west	1 NO ACCESS 2022/04/08	2022/04/20 2022/03/30
	6C 6	2022/02/24 B 2022/03/02	508	14943877 7752213 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling and all walls in the foyer located at apt 6c, 6th story, 6th apartment from south at west	1 NO ACCESS 2022/04/08	2022/04/20 2022/03/30
	6C 6	2022/02/24 B 2022/03/02	508	14943879 7752213 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at all walls in the 3rd room from east at north located at apt 6c, 6th story, 6th apartment from south at west	ACCESS	2022/04/20 2022/03/30
	6C 6	2022/02/24 B 2022/03/02	508	14943882 7752213 Original	$\S$ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at east and south wall in the 4th room from east at north located at apt 6c, 6th story, 6th apartment from south at west	1 NO ACCESS 2022/04/08	2022/04/20 2022/03/30
	6D 6	2022/02/24 C 2022/03/02	742 *		§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen located at apt 6d, 6th story, 1st apartment from north at east	NOV SENT 2022/03/02	
	6D 6	2022/02/24 B 2022/03/02	508	14943894 7752214 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color around of steam riser at ceiling in the kitchen located at apt 6d, 6th story, 1st apartment from north at east	CIV14 MAILED 2022/04/06	2022/04/20 2022/04/05
	6D 6	2022/02/24 C 2022/03/02	569	14943901 7752230 Original	hmc adm code: § 27-2017.4 abate the infestation consisting of mice in the entire apartment located at apt 6d, 6th story, 1st apartment from north at east	CIV14 MAILED 2022/04/04	2022/04/02 2022/04/01
	6D 6	2022/02/24 B 2022/03/02	702	14943902 7752214 Original	§ 27-2045 adm code repair or replace the smoke detector defective in the entire apartment located at apt 6d, 6th story, 1st apartment from north at east	CIV14 MAILED 2022/04/06	2022/04/20 2022/04/05
	6D 6	2022/02/24 В 2022/03/02	1503		§ 27-2046.1 hmc: repair or replace the carbon monoxide detecting device(s). defective in the entire apartment located at apt 6d, 6th story, 1st apartment from north at east	CIV14 MAILED 2022/04/06	2022/04/20 2022/04/05
	6D 6	2022/02/24 C 2022/03/02	790		§ 27-2043.1 hmc install the missing or repair/replace the defective window guard(s) in accordance with the specifications of the new york	CIV14 MAILED 2022/04/04	2022/04/02 2022/04/01

		CIVIL COU	IRT -	L&T	- PENDING	INDEX N	O. LT-3
<sup>22</sup> 4:28 PM DOC. NO.	3				HPD Building Info city health code section 24 rcny chapter 12. wg to install = 6; wg to replace = 0; wg to repair = 0; in the entire apartment located at apt 6d, 6th story, 1st apartment from north at east	ECEIVED	NYSCEF:
	6D 6	2022/02/24 B 2022/03/02	508		§ 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 6d, 6th story 1st apartment from north at east	MAILED	2022/04/20 2022/04/05
	6D 6	2022/02/24 B 2022/03/02	502		$\S$ 27-2005 adm code properly repair with similar material the broken or defective porcelain enamel at bathtub in the bathroom located at apt 6d, 6th story, 1st apartment from north at east	CIV14 MAILED 2022/04/06	2022/04/20 2022/04/05
	6D 6	2022/02/24 C 2022/03/02	510		$\S$ 27-2005 adm code & 309 m/d law abate the nuisance consisting of key operated lock installed at door leading to the fire escape exit in the 1st room from east at south located at apt 6d, 6th story, 1st apartment from north at east	1 NO ACCESS 2022/04/08	2022/03/15 2022/03/15
	6D 6	2022/02/24 B 2022/03/02	508		§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at south wall in the private hallway located at apt 6d, 6th story, 1st apartment from north at east	MAILED	2022/04/20 2022/04/05
	4F 4	2022/02/24 C 2022/03/02	742 *		§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen located at apt 4f, 4th story, 3rd apartment from north at east	NOV SENT 2022/03/02	2022/03/15
	4F 4	2022/02/24 B 2022/03/02	583		§ 27-2026, 2027 hmc: properly repair the source and abate the evidence of a water leak at ceiling in the kitchen located at apt 4f, 4th story, 3rd apartment from north at east	1 NO ACCESS 2022/04/08	2022/04/20 2022/03/30
	4F 4	2022/02/24 B 2022/03/02	508		§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at south wall in the kitchen located at apt 4f, 4th story, 3rd apartment from north at east	1 NO ACCESS 2022/04/08	2022/04/20 2022/03/30
	4F 4	2022/02/24 B 2022/03/02	508		§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling and north wall in the foyer located at apt 4f, 4th story, 3rd apartment from north at east	ACCESS	2022/04/20 2022/03/30
	4F 4	2022/02/24 C 2022/03/02	569		hmc adm code: § 27-2017.4 abate the infestation consisting of mice in the entire apartment located at apt 4f, 4th story, 3rd apartment from north at east	CIV14 MAILED 2022/04/04	2022/04/02 2022/04/01
	4F 4	2022/02/24 B 2022/03/02	583		§ 27-2026, 2027 hmc: properly repair the source and abate the evidence of a water leak at ceiling in the 1st room from east located at apt 4f, 4th story, 3rd apartment from north at east		2022/04/20 2022/03/30
	4F 4	2022/02/24 B 2022/03/02	508		§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling and south wall in the 1st room from east located at apt 4f, 4th story, 3rd apartment from north at east	1 NO ACCESS 2022/04/08	2022/04/20 2022/03/30
	4F 4	2022/02/24 B 2022/03/02	583	14943947 7752215 Original	§ 27-2026, 2027 hmc: properly repair the source and abate the evidence of a water leak at ceiling in the bathroom located at apt 4f, 4th story, 3rd apartment from north at east	1 NO ACCESS 2022/04/08	2022/04/20 2022/03/30
	4F 4	2022/02/24 B 2022/03/02	508		§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling and west wall in the bathroom located at apt 4f, 4th story, 3rd apartment from north at east	ACCESS 2022/04/08	2022/04/20 2022/03/30
	4C 4	2022/02/24 C 2022/03/02	742 *		§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen located at apt 4c, 4th story, 6th apartment from south at west	NOV SENT 2022/03/02	2022/03/15
	4C 4	2022/02/24 B 2022/03/02	508		§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling and south wall in the kitchen located at apt 4c, 4th story, 6th apartment from south at west	1 NO ACCESS 2022/04/08	2022/04/20 2022/03/30
	4C 4	2022/02/24 B 2022/03/02	579		§ 27-2026 adm code repair the leaky and/or defective faucets at sink in the kitchen located at apt 4c, 4th story, 6th apartment from south at west	1 NO ACCESS 2022/04/08	2022/04/20 2022/03/30
	4C 4	2022/02/24 B 2022/03/02	508	14943954 7752216 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at all walls in the 3rd room from east at south located at apt 4c, 4th story, 6th apartment from south at west	ACCESS	2022/04/20 2022/03/30
	4C 4	2022/02/24 B 2022/03/02	502		§ 27-2005 adm code properly repair with similar material the broken or defective vinyl tiles floor in the 3rd room from east at south located at apt 4c, 4th story, 6th apartment from south at west	1 NO ACCESS 2022/04/08	2022/04/20 2022/03/30

	NX	CIVIL	COUF	<u>2T –</u>	L&T	- PENDING HPD Building Info	INDEX N	10. LT-31
4/22_4-28 PM EF DOC. NO	. 3	2022/03	3/02		7752216 Original	C RE	CEIVED ACCESS 2022/04/08	NYSCEF: 2022/03/30
	4C 4	2022/02 2022/03		688		§ 27-2037, 2038 hmc: provide a safe and adequate supply of electric service to the fixtures at light fixture at ceiling in the 3rd room from east at south located at apt 4c, 4th story, 6th apartment from south at west		2022/04/20 2022/03/30
	4C 4	2022/02 2022/03		688		§ 27-2037, 2038 hmc: provide a safe and adequate supply of electric service to the fixtures at light fixture at ceiling in the foyer located at apt 4c, 4th story, 6th apartment from south at west	1 NO ACCESS 2022/04/08	2022/04/20 2022/03/30
	4C 4	2022/02 2022/03		508		§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling and all walls in the bathroom located at apt 4c, 4th story, 6th apartment from south at west	ACCESS	2022/04/20 2022/03/30
	4C 4	2022/02 2022/03		508		§ 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 north located at apt 4c, 4th story, 6th apartment from south at west	1 NO ACCESS 2022/04/08	2022/04/20 2022/03/30
	4C 4	2022/02 2022/03		556			1 NO ACCESS 2022/04/08	2022/06/19 2022/03/30
	5J 5	2022/02 2022/03		742 *		§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen located at apt 5j, 5th story, 1st apartment from south at west	NOV SENT 2022/03/02	
	5J 5	2022/02 2022/03		505		§ 27-2005 adm code replace with new the broken or defective base cabinet under sink in the kitchen located at apt 5j, 5th story, 1st apartment from south at west	NOV SENT 2022/03/02	2022/04/20
	5J 5	2022/02 2022/03		508	14943970 7752217 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at east wall in the kitchen located at apt 5j, 5th story, 1st apartment from south at west	NOV SENT 2022/03/02	
	5J 5	2022/02 2022/03		688		§ 27-2037, 2038 hmc: provide a safe and adequate supply of electric service to the fixtures at electrical outlet at north wall in the kitchen located at apt 5j, 5th story, 1st apartment from south at west	NOV SENT 2022/03/02	2022/04/20
	5J 5	2022/02 2022/03	3/02	702	7752217 Original	§ 27-2045 adm code repair or replace the smoke detector missing in the entire apartment located at apt 5j, 5th story, 1st apartment from south at west		
	5J 5	2022/02 2022/03		1503		§ 27-2046.1 hmc: repair or replace the carbon monoxide detecting device(s). missing in the entire apartment located at apt 5j, 5th story, 1st apartment from south at west	CIV14 MAILED 2022/04/07	2022/04/20 2022/04/06
	5J 5	2022/02 2022/03		569		hmc adm code: § 27-2017.4 abate the infestation consisting of mice in the entire apartment located at apt 5j, 5th story, 1st apartment from south at west	CIV14 MAILED 2022/04/04	2022/04/02 2022/04/01
	5J 5	2022/02 2022/03		583		§ 27-2026, 2027 hmc: properly repair the source and abate the evidence of a water leak at ceiling in the bathroom located at apt 5j, 5th story, 1st apartment from south at west	NOV SENT 2022/03/02	2022/04/20
	5J 5	2022/02 2022/03		508	14943977 7752217 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 5j, 5th story, 1st apartment from south at west	NOV SENT 2022/03/02	2022/04/20
	5J 5	2022/02 2022/03		502		§ 27-2005 adm code properly repair with similar material the broken or defective caulking at ceramic tiles around of bathtub in the bathroom located at apt 5j, 5th story, 1st apartment from south at west	NOV SENT 2022/03/02	2022/04/20
	5J 5	2022/02 2022/03		506	14943979 7752217 Original	§ 27-2005 adm code replace with new the missing door knob at entrance in the 1st room from east located at apt 5j, 5th story, 1st apartment from south at west	NOV SENT 2022/03/02	2022/04/20
	5J 5	2022/02 2022/03		506		§ 27-2005 adm code replace with new the missing door knob at closet at south wall in the 1st room from east located at apt 5j, 5th story, 1st apartment from south at west	NOV SENT 2022/03/02	2022/04/20
	5) 5	2022/02 2022/03		583		§ 27-2026, 2027 hmc: properly repair the source and abate the evidence of a water leak at ceiling at 1st and 2nd closet from north at east in the foyer located at apt 5j, 5th story, 1st apartment from south at west	NOV SENT 2022/03/02	

	CI	VIL COU	JRT -	L&T	- PENDING	INDEX NO. LT-32
F DOC. NO. 3		2022/03/02		7752217 Original	HPD Building Info plastered surfaces and paint in a uniform color at ceiling and all walls at 1st and 2nd closet from north at east in the foyer located at apt 5j, 5th story, 1st apartment from south at west	ECEIVED NYSCEF: 2022/03/02
5J 5		2022/02/24 B 2022/03/02	506	14943983 7752217 Original	$\S$ 27-2005 adm code replace with new the missing door knob at 1st closet from north at east in the foyer located at apt 5j, 5th story, 1st apartment from south at west	NOV SENT 2022/04/20 2022/03/02
50		2022/02/24 C 2022/03/02	742 *		§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen located at apt 5g, 5th story, 4th apartment from north at east	NOV SENT 2022/03/15 2022/03/02
50		2022/02/24 C 2022/03/02	568		hmc adm code: § 27-2017.4 abate the infestation consisting of roaches in the entire apartment located at apt 5g, 5th story, 4th apartment from north at east	CIV14 2022/04/02 MAILED 2022/04/01 2022/04/04
50 5		2022/02/24 C 2022/03/02	510	14943988 7752228 Original	$\S$ 27-2005 adm code & 309 m/d law abate the nuisance consisting of uncapped inactive gas pipeline behind the stove in the kitchen located at apt 5g, 5th story, 4th apartment from north at east	NOV SENT 2022/03/15 2022/03/02
50		2022/02/24 A 2022/03/02	550	14943990 7752208 Original	$\S$ 27-2017.3 hmc: trace and repair the source and abate the visible mold condition at ceiling and window header approx. 4 sq.ft in the bathroom located at apt 5g, 5th story, 4th apartment from north at east	NOI SENT 2022/06/19 2022/03/02
50		2022/02/24 B 2022/03/02	508	14943992 7752218 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling, north and east wall in the 1st room from east located at apt 5g, 5th story, 4th apartment from north at east	CIV10 2022/04/20 MAILED 2022/03/30 2022/04/11
1		2022/02/24 C 2022/03/02	530	14943993 7752234 Original	$\S$ 27-2005, 2007, 204.1 hmc code: arrange and make self-closing the doors at building entrance , 1st story	NOV CERT 2022/04/02 2022/04/01 2022/04/01
1		2022/02/24 A 2022/03/02	722		§ 27-2053 adm code post sign on wall of entrance story bearing name, address including apartment number if any, and telephone number of superintendent, janitor or housekeeper. at public hall, 1st story	NOV CERT 2022/06/19 2022/04/05 2022/04/05
1		2022/02/24 B 2022/03/02	538 *	14943995 7752209 Original	§ 27-2005, 2007 adm code remove all encumbrances consisting of house hold items under staircase at south section at public hall, 1st story	NOV CERT 2022/04/20 2022/04/05 2022/04/05
1		2022/02/24 B 2022/03/02	552	14943996 7752209 Original	§ 27-2010, 2011, 2012 adm code remove the accumulation of refuse and/or rubbish and maintain in a clean condition the floor under staircase at north section at public hall, 1st story	NOV CERT 2022/04/20 2022/04/05 2022/04/05
All St	l :ories	2022/02/24 A 2022/03/02	553	7752202 Original	§ 27-2011 adm code cleanse to the satisfaction of this department the floors, stairs and public halls at all stories	2022/04/05 2022/04/05
Ba		2022/02/24 C 2022/03/02	530		§ 27-2005, 2007, 204.1 hmc code: arrange and make self-closing the doors at entrance at boiler room	NOV CERT 2022/04/02 2022/04/01 2022/04/01
Ba		2022/02/24 B 2022/03/02	506	14944005 7752209 Original	§ 27-2005 adm code replace with new the missing door knob at entrance at boiler room	NOV CERT 2022/04/20 2022/04/05 2022/04/05
Ba		2022/02/24 B 2022/03/02	552	14944008 7752209 Original	§ 27-2010, 2011, 2012 adm code remove the accumulation of refuse and/or rubbish and maintain in a clean condition the floor at boiler room	NOV CERT 2022/04/20 2022/04/05 2022/04/05
Ba		2022/02/24 B 2022/03/02	552	14944009 7752209 Original	$\S$ 27-2010, 2011, 2012 adm code remove the accumulation of refuse and/or rubbish and maintain in a clean condition the floor at basement	NOV CERT 2022/04/20 2022/04/05 2022/04/05
6		2022/02/24 B 2022/03/02	502	14944010 7752209 Original	§ 27-2005 adm code properly repair with similar material the broken or defective fire retardant material at ceiling and east wall at public hall, 6th story, section "south"	NOV SENT 2022/04/20 2022/03/02
6		2022/02/24 A 2022/03/02	556	7752202 Original	§ 27-2013 adm code paint with light colored paint to the satisfaction of this department the ceiling and east wall at public hall, 6th story, section "south"	NOV SENT 2022/06/19 2022/03/02
6		2022/02/24 B 2022/03/02	507 *	14944015 7752209 Original	§ 27-2005 adm code repair the roof so that it will not leak at ceiling at public hall, 6th story, section "north"	NOV SENT 2022/04/20 2022/03/02
6		2022/02/24 B 2022/03/02	502	14944016 7752209 Original	§ 27-2005 adm code properly repair with similar material the broken or defective fire retardant material at ceiling at public hall, 6th story, section "north"	NOV SENT 2022/04/20 2022/03/02
6		2022/02/24 A 2022/03/02	556		§ 27-2013 adm code paint with light colored paint to the satisfaction of this department the ceiling at public hall, 6th story, section "north"	

#### FILED: BI A/14/22 4 28 PI NYSCEF DOC. ONY CTUTL COL

INDEX NO. LT-311501-22/BX

RECEIVED	NYSCEF:	05/03/2022

<u>X C:</u> 3	IVIL COU		L&T	PENDING HPD Building Info	RECEIVED NYSCEF:
Roof	2022/02/24 C 2022/03/02	530	14944018 7752234 Original	§ 27-2005, 2007, 204.1 hmc code: arrange and make self-closing the doors at entrance at bulkhead at north section	NOV CERT 2022/04/02 2022/04/01 2022/04/01
Roof	2022/02/24 B 2022/03/02	506	14944019 7752209 Original	§ 27-2005 adm code replace with new the missi approved wire mish screen below the skylight at ceiling at north and south bulkhead	
Roof	2022/02/24 B 2022/03/02	502	14944024 7752209 Original	§ 27-2005 adm code properly repair with similar material the broken or defective eroded mortar brick joints at chimney at roof	- NOV SENT 2022/04/20 2022/03/02
6G 6	2022/02/17 A 2022/02/22	508	14835022 7688411 Original	§ 27-2005 adm code repair the broken or defect plastered surfaces and paint in a uniform color south wall in the 1st room from east located at a 6g, 6th story, 2nd apartment from north at east 1st section from east at south	ACCESS 2022/03/30 apt 2022/04/08
6G 6	2022/02/17 B 2022/02/22	507 *	14835023 7688413 Original	§ 27-2005 adm code repair the roof so that it wi not leak over ceiling and south wall in the 1st ro from east located at apt 6g, 6th story, 2nd apartment from north at east , 1st section from east at south	
6G 6	2022/02/17 C 2022/02/22	742 *	14835024 7688414 Original	§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen located at apt 6g, 6th story, 2nd apartment from north at east, 1st section from east at south	2022/02/22
Cellar	2022/02/17 B 2022/02/22	571	14835025 7688412 Original	§ 27-2021 adm code provide sufficient, proper a separate metal receptacles for the deposit of garbage, rubbish and other waste material and arrange for collection and disposal of such mater	2022/04/05 2022/04/05
1E 1	2022/02/01 C 2022/02/02	622	14810174 7625987 Original	§ 27-2056.7, 27-2056.8, 27-2056.9 adm code - certify compliance with lead-based paint hazard control requirements during period of unit vacan by performing activities necessary to abate teste lead-based paint from required window and/or d friction surfaces for apartment and make floors smooth and cleanable, positive lead-based paint an apartment with a child under six located at a 1e, 1st story, 2nd apartment from north at east	ed oor in
1E 1	2022/01/31 C 2022/02/01	742 *	14809578 7625052 Original	§ 27-2070 adm code provide an adequate supply of gas to the fixtures at gas range in the kitchen located at apt 1e, 1st story, 2nd apartment from north at east	2022/02/01
1E 1	2022/01/31 A 2022/02/01	556	14809579 7625047 Original	§ 27-2013 adm code paint with light colored pain to the satisfaction of this department at 2nd window frame from north at east wall in the 1st room from east at north located at apt 1e, 1st story, 2nd apartment from north at east	2022/02/01
1E 1	2022/01/31 A 2022/02/01	554	14809580 7625047 Original	§ 27-2005 adm code paint metal in accordance with dept. regulation at 1st radiator from north a east wall in the 1st room from east at north loca at apt 1e, 1st story, 2nd apartment from north a east	ted
1E 1	2022/01/31 A 2022/02/01	554	14809581 7625047 Original	§ 27-2005 adm code paint metal in accordance with dept. regulation at 1st radiator from west a north wall in the 1st room from east at south located at apt 1e, 1st story, 2nd apartment from north at east	
1E 1	2022/01/31 A 2022/02/01	556	14809582 7625047 Original	§ 27-2013 adm code paint with light colored pain to the satisfaction of this department at 1st door from south at west wall, baseboard at east wall i the 1st room from east at south located at apt 1 1st story, 2nd apartment from north at east	r 2022/02/01 in
1E 1	2022/01/31 A 2022/02/01	556	14809583 7625047 Original	§ 27-2013 adm code paint with light colored pain to the satisfaction of this department at baseboard at north wall, baseboard at west wall, baseboard south wall, baseboard at east wall in the 2nd roo from east located at apt 1e, 1st story, 2nd apartment from north at east	ard 2022/02/01 Lat
1E 1	2022/01/31 A 2022/02/01	556	14809584 7625047 Original	§ 27-2013 adm code paint with light colored pain to the satisfaction of this department at 1st close from south at west wall door frame, 1st closet fr south at west wall door, 3rd closet from south at west wall door frame, 3rd closet from south at w wall door in the private hallway located at apt 16 1st story, 2nd apartment from north at east	et 2022/02/01 om : vest
1E 1	2022/01/31 A 2022/02/01	550	14809585 7625049 Original	§ 27-2017.3 hmc: trace and repair the source ar abate the visible mold condition approx. 2 sq f at 2nd closet from south at west wall door frame 2nd closet from south at west wall door in the private hallway located at apt 1e, 1st story, 2nd apartment from north at east	ft 2022/02/01
1E	2022/01/31 A 2022/02/01	556		§ 27-2013 adm code paint with light colored pain to the satisfaction of this department at baseboa	

ED: BRO	NX	CIVIL COU	RT –	L&T	- PENDING	INDEX N	IO. LT-31
14/22_4:28 PM DOC . NO	. 3			Original	HPD Building Info at north wall in the foyer located at apt 1e, 1st	ECEIVED	NYSCEF:
	1E 1	2022/01/31 A 2022/02/01	554		story, 2nd apartment from north at east § § 27-2005 adm code paint metal in accordance with dept. regulation at 1st door from south at west wall in the foyer located at apt 1e, 1st story, 2nd apartment from north at east	NOV SENT 2022/02/01	2022/05/21
	1E 1	2022/01/31 B 2022/02/01	508		§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at west wall in the bathroom located at apt 1e, 1st story, 2nd apartment from north at east	CIV10 MAILED 2022/04/11	2022/03/22 2022/03/22
	1E 1	2022/01/31 A 2022/02/01	550		§ 27-2017.3 hmc: trace and repair the source and abate the visible mold condition approx. 2 sq ft at 1st door from west at north wall in the bathroom located at apt 1e, 1st story, 2nd apartment from north at east	NOI SENT 2022/02/01	2022/05/21
	2H 2	2022/01/31 A 2022/02/01	550		§ 27-2017.3 hmc: trace and repair the source and abate the visible mold condition approx. 2 sq ft at ceiling, north wall and north window frame in the bathroom located at apt 2h, 2nd story, 5th apartment from north at east	NOI SENT 2022/02/01	2022/05/21
	2H 2	2022/01/31 C 2022/02/01	790		§ 27-2043.1 hmc install the missing or repair/replace the defective window guard(s) in accordance with the specifications of the new york city health code section 24 rcny chapter 12. wg to install = 4; wg to replace = 0; wg to repair = 0; located at apt 2h, 2nd story, 5th apartment from north at east	NOV SENT 2022/02/01	2022/03/04
	2H 2	2022/01/31 B 2022/02/01	501	14809593 7625050 Original	§ 27-2005 adm code properly repair the broken or defective electrical light fixture at ceiling in the 2nd room from east located at apt 2h, 2nd story, 5th apartment from north at east		2022/03/22 2022/03/22
	1E 1	2022/01/31 C 2022/02/01	624	14809660 7625053 Original	§ 27-2056.6 adm code - correct the lead-based paint hazard-paint that is xrf tested inconclusive for lead content at 0.5mg/cm2 and is presumed lead paint as set forth in (28 rcny §11-07(b)) and that is peeling or on a deteriorated subsurface- using work practices set forth in 28 rcny §11-06(b) (2) 1st door frame from west at north wall in the bathroom located at apt 1e, 1st story, 2nd apartment from north at east	POSTP GRANT 2022/03/08	2022/03/02
	1E 1	2022/01/31 C 2022/02/01	617	14809661 7625053 Original	§ 27-2056.6 adm code - correct the lead-based paint hazard - paint that tested positive for lead content and that is peeling or on a deteriorated subsurface - using work practices set forth in 28 rcny §11-06(b)(2) baseboard at south wall, north wall, south wall in the foyer located at apt 1e, 1st story, 2nd apartment from north at east	POSTP GRANT 2022/03/08	2022/03/02
	1E 1	2022/01/31 C 2022/02/01	624	14809662 7625053 Original	§ 27-2056.6 adm code - correct the lead-based paint hazard-paint that is xrf tested inconclusive for lead content at 0.5mg/cm2 and is presumed lead paint as set forth in (28 rcny §11-07(b)) and that is peeling or on a deteriorated subsurface- using work practices set forth in 28 rcny §11-06(b) (2) baseboard at east wall in the foyer located at apt 1e, 1st story, 2nd apartment from north at east		2022/03/02
	1E 1	2022/01/31 C 2022/02/01	624	14809663 7625053 Original	§ 27-2056.6 adm code - correct the lead-based paint hazard-paint that is xrf tested inconclusive for lead content at 0.5mg/cm2 and is presumed lead paint as set forth in (28 rcny §11-07(b)) and that is peeling or on a deteriorated subsurface- using work practices set forth in 28 rcny §11-06(b) (2) 1st door frame from west at north wall, north wall, south wall, east wall, west wall in the 2nd room from east located at apt 1e, 1st story, 2nd apartment from north at east	POSTP GRANT 2022/03/08	2022/03/02
	1E 1	2022/01/31 C 2022/02/01	617	14809664 7625053 Original	§ 27-2056.6 adm code - correct the lead-based paint hazard - paint that tested positive for lead content and that is peeling or on a deteriorated subsurface - using work practices set forth in 28 rcny §11-06(b)(2) north wall, south wall, east wall, 1st window frame from north at east wall in the 1st room from east at south located at apt 1e, 1st story, 2nd apartment from north at east		2022/03/02
	1E 1	2022/01/31 C 2022/02/01	617	14809665 7625053 Original	§ 27-2056.6 adm code - correct the lead-based paint hazard - paint that tested positive for lead content and that is peeling or on a deteriorated subsurface - using work practices set forth in 28 rcny §11-06(b)(2) north wall, south wall, east wall in the 1st room from east at north located at apt 1e, 1st story, 2nd apartment from north at east	POSTP GRANT 2022/03/08	2022/03/02
	1E 1	2022/01/31 C 2022/02/01	624	14809666 7625053	§ 27-2056.6 adm code - correct the lead-based paint hazard-paint that is xrf tested inconclusive	POSTP GRANT	2022/03/02

<b>14/22 4:28 PM</b> EF DOC NO		VIL COUL	<u> </u>	L&T			O. LT-3
DUC. NO	. 3				RE lead paint as set forth in (28 rcny §11-07(b)) and that is peeling or on a deteriorated subsurface- using work practices set forth in 28 rcny §11-06(b) (2) 1st closet from west at north wall door frame in the 1st room from east at north located at apt 1e, 1st story, 2nd apartment from north at east		NYSCEF:
	1E 1	2022/01/31 C 2022/02/01	617	14809667 7625053 Original	§ 27-2056.6 adm code - correct the lead-based paint hazard - paint that tested positive for lead content and that is peeling or on a deteriorated subsurface - using work practices set forth in 28 rcny §11-06(b)(2) 1st door frame from west at north wall, 1st window frame from east at south wall in the kitchen located at apt 1e, 1st story, 2nd apartment from north at east	POSTP GRANT 2022/03/08	2022/03/02
	1E 1	2022/01/31 C 2022/02/01	617	14809668 7625053 Original	§ 27-2056.6 adm code - correct the lead-based paint hazard - paint that tested positive for lead content and that is peeling or on a deteriorated subsurface - using work practices set forth in 28 rcny $\$11-06(b)(2)$ west wall in the private hallway located at apt 1e, 1st story, 2nd apartment from north at east	POSTP GRANT 2022/03/08	2022/03/02
	Yards / Courts	2022/01/21 B 2022/01/24	571		§ 27-2021 adm code provide sufficient, proper and separate metal receptacles for the deposit of garbage, rubbish and other waste material and arrange for collection and disposal of such material.	CIV10 MAILED 2022/04/11	2022/03/14 2022/03/14
	2H 2	2022/01/21 C 2022/01/24	742 *		§ 27-2070 adm code provide an adequate supply of gas to the fixtures at range in the kitchen located at apt 2h, 2nd story, 5th apartment from north at east	NOV SENT 2022/01/24	2022/02/06
	2C 2	2022/01/05 B 2022/01/07	579		§ 27-2026 adm code repair the leaky and/or defective faucets at bathtub in the bathroom located at apt 2c, 2nd story, 2nd apartment from south at west	NOV SENT 2022/01/07	2022/02/25
	6H 6	2021/12/30 C 2022/01/03	569		hmc adm code: § 27-2017.4 abate the infestation consisting of mice in the entire apartment located at apt 6h, 6th story, 3rd apartment from north at east	1 NO ACCESS 2022/04/08	2022/02/03 2022/02/03
	3F 3	2021/12/28 C 2021/12/29	569		hmc adm code: § 27-2017.4 abate the infestation consisting of mice in the entire apartment located at apt 3f, 3rd story, 1st apartment from north at east , 1st section from east at south	NOT COMPLIED 2022/04/08	
	1H 1	2021/12/23 A 2021/12/27	506	14750256 7589397 Original	§ 27-2005 adm code replace with new the missing radiator shut off valve handle in the 2nd room from north located at apt 1h, 1st story, 3rd apartment from west at north	CIV14 MAILED 2022/04/06	2022/04/15 2022/04/05
	5E 5	2021/12/20 C 2021/12/21	666 *		$\S$ 27-2029 adm code provide an adequate supply of heat for the apartment in the 1st room from east located at apt 5e, 5th story, 2nd apartment from west at north , 1st section from south at west	NOV SENT 2021/12/21	
	5E 5	2021/12/20 B 2021/12/21	583		$\S$ 27-2026, 2027 hmc: properly repair the source and abate the evidence of a water leak at east wall above window frame in the 1st room from east at north located at apt 5e, 5th story, 2nd apartment from west at north , 1st section from south at west	CIV10 MAILED 2022/04/11	2022/02/08 2022/02/08
	5E 5	2021/12/20 B 2021/12/21	508		$\S$ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color the ceiling in the 1st room from east at south located at apt 5e, 5th story, 2nd apartment from west at north , 1st section from south at west	CIV10 MAILED 2022/04/11	2022/02/08 2022/02/08
	5] 5	2021/12/02 B 2021/12/06	521		§ 27-2005, 2007 adm code fire egress defective. remove obstructing bars or unlawful gates from window to fire escape or provide approved type gate in the entire apartment located at apt 5j, 5th story, 1st apartment from west at north	NOV SENT 2021/12/06	2022/01/24
	5J 5	2021/12/02 A 2021/12/06	556		§ 27-2013 adm code paint with light colored paint to the satisfaction of this department walls and ceilings in the entire apartment located at apt 5j, 5th story, 1st apartment from west at north	CIV10 MAILED 2022/04/11	2022/03/25 2022/03/25
	5J 5	2021/12/02 C 2021/12/06	568		hmc adm code: § 27-2017.4 abate the infestation consisting of roaches in the entire apartment located at apt 5j, 5th story, 1st apartment from west at north	NOI SENT 2021/12/06	2022/01/06
	5J 5	2021/12/02 C 2021/12/06	569		hmc adm code: § 27-2017.4 abate the infestation consisting of mice in the entire apartment located at apt 5j, 5th story, 1st apartment from west at north	NOI SENT 2021/12/06	2022/01/06
	5I 5	2021/11/06 B 2021/11/08	583		§ 27-2026, 2027 hmc: properly repair the source and abate the evidence of a water leak at ceiling and north wall in the 3rd room from east at north located at apt 5i, 5th story, 6th apartment from north at east	NOV SENT 2021/11/08	2021/12/27

: BRON	IX	CIVIL	COU	RT -	L&T		INDEX N	0. LT-31
4:28 PM DOC. NO.	3 51 5	2021/11 2021/11		508		HPD Building Info RF § 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color the ceiling, north and east walls in the 3rd room from east at north located at apt 5i, 5th story, 6th apartment from north at east	NOV SENT	
	2D 2	2021/11 2021/11		583	7538190	§ 27-2026, 2027 hmc: properly repair the source and abate the evidence of a water leak at ceiling in the bathroom located at apt 2d, 2nd story, 1st apartment from north at east		2021/12/27
	2D 2	2021/11 2021/11		508		§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at all walls and ceiling in the bathroom located at apt 2d, 2nd story, 1st apartment from north at east	NOV SENT 2021/11/08	
	4] 4	2021/10 2021/10		505		§ 27-2005 adm code replace with new the broken or defective rubber gasket at refrigerator door in the kitchen located at apt 4j, 4th story, 1st apartment from south at west , 1st section from west at north	NOV SENT 2021/10/27	2021/12/15
	1	2021/10 2021/10		506		$\S$ 27-2005 adm code replace with new the missing the mailbox door ( <code>apt.#1d</code> ) at public hall, 1st story	NOV SENT 2021/10/18	2021/12/06
	1D 1	2021/10 2021/10		502		§ 27-2005 adm code properly repair with similar material the broken or defective vinyl tile floor covering in the kitchen located at apt 1d, 1st story, 1st apartment from north at east , 1st section from west at north	NOV SENT 2021/10/18	2021/12/06
	1D 1	2021/10 2021/10		556		$\S$ 27-2013 adm code paint with light colored paint to the satisfaction of this department around the south window frame in the 1st room from east at north located at apt 1d, 1st story, 1st apartment from north at east , 1st section from west at north	NOV SENT 2021/10/18	2022/02/04
	1D 1	2021/10 2021/10		502		§ 27-2005 adm code properly repair with similar material the broken or defective porcelain finish at bathtub interior in the bathroom located at apt 1d, 1st story, 1st apartment from north at east , 1st section from west at north		2021/12/06
	3A 3	2021/09 2021/09		616		§ 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 $1-06(b)(2)$ 1st riser from east at south wall in the bathroom located at apt 3a, 3rd story, 4th apartment from north at east	2021/09/23	2021/10/22
	3K 3	2021/07 2021/07		583		§ 27-2026, 2027 hmc: properly repair the source and abate the evidence of a water leak at ceiling in the bathroom located at apt 3k, 3rd story, 2nd apartment from south at west	NOT COMPLIED 2021/09/05	2021/09/17
	3K 3	2021/07 2021/07		508		§ 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 3k, 3rd story, 2nd apartment from south at west	COMPLIED	2021/09/17
	3K 3	2021/07 2021/07		583		§ 27-2026, 2027 hmc: properly repair the source and abate the evidence of a water leak at ceiling and east wall in the kitchen located at apt 3k, 3rd story, 2nd apartment from south at west	NOT COMPLIED 2021/09/05	2021/09/17
	3K 3	2021/07 2021/07		508		§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling and east wall in the kitchen located at apt 3k, 3rd story, 2nd apartment from south at west	NOT COMPLIED 2021/09/05	2021/09/17
	1H 1	2021/07 2021/07		550		§ 27-2017.3 hmc: trace and repair the source and abate the visible mold condition approx. 5 sq.ft. at south and east wall in the bathroom located at apt 1h, 1st story, 1st apartment from north at east original violation 1409353 issued 26-mar-21 has been upgraded to class b per administrative code §27-2017.3a(3)(a) or (b).	DEFECT LETTER 2021/09/30	2021/09/15
	5I 5	2021/07 2021/07		550		§ 27-2017.3 hmc: trace and repair the source and abate the visible mold condition ceiling approx 2 sq ft east wall approx 1 sq ft west wall apprx 1 sq ft in the bathroom located at apt 5i, 5th story, 4th apartment from north at east original violation 14052489 issued 03-mar-21 has been upgraded to class b per administrative code §27-2017.3a(3)(a) or (b).	DEFECT LETTER 2021/09/14	2021/08/24
	1H 1	2021/03 2021/05		550		§ 27-2017.3 hmc: trace and repair the source and abate the visible mold condition approx 10 sq ft at south and west wall in the bathroom located at apt 1h, 1st story, 1st apartment from north at east original violation 14051759 issued 02-mar-21 has been upgraded to class c per administrative code §27-2017.3a(5)(a) or (b).	DEFECT LETTER 2021/09/30	2021/06/04
	6G	2020/10	)/21 B	508	13864199	§ 27-2005 adm code repair the broken or defective	NOT	2020/12/10

ED: BRONX	COUR	т –	L&T	- PENDING	INDEX N	0. LT-31
14/22_4:28 PM EF <sup>2</sup> DOC. NO. 3   6	/10/22		6987202 Original	HPD Building Info plastered surfaces and paint in a uniform color ceiling and east wall in the kitchen located at apt 6g, 6th story, 2nd apartment from west at north	CEIVED COMPLIED 2021/09/05	NYSCEF:
60 6	 /10/21 B /10/22	508	13864211 6987202 Original	§ 27-2005 adm code repair the broken or defective	COMPLIED	2020/12/10
60 6	/10/21 B /10/22	508		§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color north and east walls in the 1st room from north located at apt 6g, 6th story, 2nd apartment from west at north	NOT COMPLIED 2021/09/05	2020/12/10
60 6	 /10/21 B /10/22	501		§ 27-2005 adm code properly repair the broken or defective 1st and 2nd wood window frame at north wall in the 1st room from north located at apt 6g, 6th story, 2nd apartment from west at north		2020/12/10
60 6	 /10/21 C /10/22	568	13864251 6987203 Original	hmc adm code: § 27-2017.4 abate the infestation consisting of roaches in the entire apartment located at apt 6g, 6th story, 2nd apartment from west at north	NOT COMPLIED 2021/09/05	2020/11/22
60 6	/10/21 C /10/22	569		hmc adm code: § 27-2017.4 abate the infestation consisting of mice in the entire apartment located at apt 6g, 6th story, 2nd apartment from west at north	NOT COMPLIED 2021/09/05	2020/11/22
3/ 3	/09/22 A /09/28	553		§ 27-2011 adm code cleanse to the satisfaction of this department the mold on grout around bath tub in the bathroom located at apt 3a, 3rd story, 4th apartment from south at west	NOT COMPLIED 2021/09/05	2021/01/15
3/ 3	/09/22 C /09/28	568		hmc adm code: § 27-2017.4 abate the infestation consisting of roaches in the entire apartment located at apt 3a, 3rd story, 4th apartment from south at west	NOT COMPLIED 2021/09/05	2020/10/29
2]	/08/19 B /08/24	508	13775008 6936631 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color second closet walls and ceiling in the private hallway located at apt 2j, 2nd story, 1st apartment from south at west	1 NO ACCESS 2021/09/14	2020/10/12
11	/03/28 B /03/30	550		§ 27-2017.3 hmc: trace and repair the source and abate the visible mold condition on window frame approx 2 sq ft in the 1st bathroom located at apt 1d, 1st story, 1st apartment from north at east original violation 13474742 issued 27-nov-19 has been upgraded to class b per administrative code §27-2017.3a(3)(a) or (b).	DEFECT LETTER 2021/09/04	2020/05/18
3I 3	/01/17 C /01/21	569		hmc adm code: § 27-2017.4 abate the infestation consisting of mice in the entire apartment located at apt 3k, 3rd story, 2nd apartment from north at east , section "north"	NOT COMPLIED 2021/09/05	2020/02/16
1F 1	 /10/04 B /10/21	550		§ 27-2017.3 hmc: trace and repair the source and abate the visible mold condition at ceiling proximately 15 sq ft in the bathroom located at apt 1h, 1st story, 3rd apartment from north at east	LETTER	2019/12/09
1H 1	/10/04 C /10/21	568		hmc adm code: § 27-2017.4 abate the infestation consisting of roaches in the entire apartment located at apt 1h, 1st story, 3rd apartment from north at east	DEFECT LETTER 2021/09/14	2019/11/16 2020/08/27
21 2	/08/09 B /08/13	550		§ 27-2017.3 hmc: trace and repair the source and abate the visible mold condition at ceiling appr. 2 sq ft , east wall appr. 4 sq ft, north wall 8 sq ft and west wall appr. 2 sq ft in the bathroom located at apt 2d, 2nd story, 1st apartment from north at east	2021/09/04	2019/10/01
1F 1	 /06/16 B /06/20	508	11278359 5454757 Original	§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color all ceilings and walls in the entire apartment located at apt 1b, 1st story, 1st apartment from south at west , section at north	1 NO ACCESS 2021/09/14	2016/08/08 2016/08/08



## **EXHIBIT B**



# Soundview tenants without heat for 2 weeks amid freezing temperatures

Jan 15, 2022, 1:25pm • Updated on Jan 15, 2022

By: News 12 Staff



Soundview residents are frustrated after two weeks without proper heating, especially as temperatures drop this weekend.



NYSCEF DOC. NO. 4

INDEX NO. LT-311501-22/BX RECEIVED NYSCEF: 05/03/2022



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AUVENHOING

To keep herself warm, Coulton uses a space heater, but she is wary to use it since one was the cause of the fatal fire at the Twin Parks apartment building last week.

Coulton says just a few days ago, the cooking gas was turned off too. She says she was provided a hot plate, but has been microwaving her meals recently.

On the walls of the building are several violations issued for inadequate heating.

The building's management company Concord Management tells News 12 they are aware of the lack of heating and are working with the boiler company to resolve the issue.

## Share this story

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