SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

In the Matter of the Application of MAGGI PEYTON,

Petitioner,

For an Order of Certiorari pursuant to New York City Administrative Code Ch.2-Sec 25-207,

-against-

New York City Board of Standards and Appeals Margery Perlmutter, Chair; Susan M. Hinkson, Vice-Chair; Eileen Montanez, and Dora Ottley-Brown, each in her capacity as a Commissioner of Board of Standards and Appeals; Jewish Home Lifecare, Inc., and PWV Acquisition, LLC.,

Respondents.

Index No.

VERIFIED PETITION

Petitioner, by her undersigned attorney, for her Verified Petition in this special proceeding, alleges as follows:

Nature of the Proceeding

1. In this Special Proceeding Petitioner seeks an Order of Certiorari pursuant to New York City Administrative Code Ch. 2 Sec. 25 – 207, to reverse a Resolution of the Respondent BSA, dated October 22, 2015. This Resolution improperly and illegally affirmed a zoning decision made by the Commissioner of the New York City Department of Buildings ("DOB") that erroneously calculated limited access rooftop space as "open space" for the purpose of evaluating whether there was sufficient required minimum open space to allow construction at a site on West 97th Street in Manhattan. The BSA decision, which would allow construction of a 20 story nursing facility on an open lot owned by Respondent PWV Acquisition, LLC ("PWV"), failed to apply the specific applicable requirements of the current New York Zoning Resolution

regarding calculation of open space. Instead, it illegally misinterpreted the ZR's important "open space" provisions that grant to all residents in a zoning lot a required minimum amount of open, usable and accessible space.

The Parties

2. Petitioner Maggi Peyton (Appellant below) was one of 14 stakeholders of the Park West Village Community on the Upper West Side of Manhattan who wrote a letter to the New York City Department of Buildings(DOB) asking it to deny a building permit to Respondent Jewish Home Lifecare (JHL) to construct a nursing facility on West 97th Street. DOB denied this request.

3. Respondent New York City Board of Standards and Appeals (BSA) and the named Commissioners denied an appeal by Petitioner asking the BSA to reverse the decision of the DOB which rejected the stakeholders' request to deny a building permit to Respondent JHL.

4. Respondent JHL is a nursing facility located on West 106th Street in Manhattan which proposes to build a 20 story facility on West 97th Street on a parking lot in the Park West Village complex (of four residential buildings).

5. Respondent PWV Acquisition LLC (PWV) is the owner of the property upon which Respondent JHL proposes to construct the nursing facility.

Facts

The Stakeholders' Challenge to the Zoning Determination

6. On August 22, 2014, Petitioner and 14 other stakeholders of the Park West Village neighborhood addressed a letter to Rick D. Chandler, P.E, the Commissioner of DOB, asking him to deny a building permit to Respondent JHL to construct a 20-story nursing facility on

Block 1520, Lot 5, a parking lot on West 97th Street directly adjacent to Public School 163 and two residential buildings in the Park West Village complex.

7. The stakeholders' letter stated, *inter alia,* that DOB should deny a building permit because Respondent JHL could not satisfy the Minimum Open Space Requirement as set forth in Section 12-10 of the ZR, as amended on February 2, 2011.

8. Section 12-10 of the ZR provides as follows:

> 'Open space' is that part of a zoning lot, including courts or yards, which is open and unobstructed from its lowest level to the sky and is accessible to and usable to all persons occupying a dwelling unit or a rooming unit on the zoning lot.

(Petitioner's Exhibit 1, Preliminary Statement, December 8, 2014, Exhibit E at page 2; portions of the Preliminary Statement which are not relevant to this appeal have been deleted). Calculation of Open Space is governed by Sections 23-14 and 23-142 of the ZR. Compliance with these sections is critical in maintaining light, air, recreational space and quality of life in densely populated residential districts. (Petitioner's Exhibit 1 – Exhibit F and Exhibit G).

9. In a Memorandum annexed to the stakeholders' letter, they stated that in order to obtain a building permit Respondent JHL must show that there existed an excess of approximately 230,085 sq. ft. of open space on the zoning lot. (In a separate filing Respondent JHL's number for the Open Space Requirement was 230,108 sq. ft., a similar amount). The stakeholders stated that JHL could not meet this requirement because 56,851 sq. ft. of rooftop gardens at one of the buildings on the zoning lot (808 Columbus Avenue) was reserved for the exclusive use of the residents of that building and was not accessible to and usable by all persons residing in dwelling units on the zoning lot. (Petitioner's Exhibit 1 – Exhibit A at pages 1-4 and 7-8). Deducting the 56,851 sq. ft. of inaccessible rooftop gardens at 808 Columbus Avenue from the total open space proposed by Respondent JHL on the zoning lot (230,726 sq. ft) left only

173,875 sq. ft. of open space, well below the required open space minimum of 230,108 sq. ft. needed for the project to go forward (see discussion *infra*).

DOB Response to Stakeholders' Challenge

10. On November 10, 2014 the stakeholders' zoning challenge was rejected by DOB. In a letter addressed to one of the stakeholders, Maggie Peyton, First Deputy Commissioner Thomas J. Fariello (Commissioner Fariello) stated that the challenge was denied because the Open Space Requirement for the proposed nursing home had been satisfied:

> The writer claims that the applicant for the New Building application has not demonstrated that the 'open space' requirement, as set forth in Section 12-10 of the Zoning Resolution, has been satisfied. From our review of the zoning plans, dated April 9, 2014, submitted to the Department for the foundation approval of the new building, the minimum open space required for the zoning lot is 230,108 sq. ft. The zoning lot area is 308,475 sq. ft. The lot coverage for the 20-story community facility building is 20,036 sq. ft. of which 10,431 sq. ft. of open space covered by the roof of the building, provided at the first story, is counted as open space for the zoning lot. The total proposed lot coverage for the zoning lot, including the community facility building, is 77,749 sq. ft. and the total open space provided for the zoning lot is 230,726 sq. ft. The proposed open space (230,726 sq. ft.) exceeds the minimum open space required for the zoning lot (230,108 sq. ft.); the proposed open space complies with the required open space provisions, per ZR 23-142).

(See Petitioner's Exhibit 1, Exhibit A at pages 5-6).

11. Commissioner Fariello's letter did not address the objection raised by the stakeholders that 56,851 sq. ft. of rooftop gardens could not be counted as open space under the current ZR because they were not usable by and accessible to all persons residing on the zoning lot. Instead, based on the figures supplied by Respondent JHL, he included the inaccessible rooftop gardens in his calculation of 230,726 of provided open space. This analysis of the Open Space Requirement was not based on the law that existed at the time the latest Zoning Diagram for the new building was posted/scanned into the virtual folder of DOB, December 4, 2013 (see

Commissioner Fariello's letter at page 5). Instead, as will be demonstrated *infra*, he based his analysis on Respondent JHL's calculations that were made before the ZR was amended on February 2, 2011, and which counted the inaccessible rooftop gardens as open space in violation of the amended ZR.

12. On February 2, 2011, the New York City Council enacted amendments to the text of the ZR, which had been written by the New York City Department of City Planning. Significantly, the ZR provided that as to future projects the amendments were to have prospective application, and that "any zoning lot . . . and any building or other structure shall be subject to . . . the provisions of this Resolution in effect *at the time of such development* . . ." (ZR 11-111, emphasis added). Thus, any building applications filed after the effective date of the text amendments were to be governed by the provisions of the ZR in effect at the time of such application,

13. Among the text amendments were changes in five sections of the ZR that pertained to the calculation of open space, which have a direct bearing on this appeal. In each of these five sections the words "building" and "any building" were deleted from the ZR, and were replaced by the words "zoning lot" and "zoning lots," and "all zoning lots" making it clear that calculations of maximum required open space, open space ratios, lot coverage and maximum floor area were to be made with reference to a zoning lot or zoning lots and not with reference to "buildings" or "any building."

14. Accordingly, Section 12-10 of the ZR was amended to read as follows:

> Open space ratio:
> The 'open space ratio" of a zoning lot is the number of square feet of open space on the zoning lot expressed as a percentage of the floor area on that zoning lot. (For example, if for a particular [*building*] <u>zoning lot</u> an open space ratio of 20 is required, 20,000 square feet of floor area in the building

would necessitate 4,000 square feet of open space on the zoning lot [*upon which the building stands;*] or, if 6,000 square feet of lot area were in open space, 30,000 square feet of floor area could be [*in the building*] on that zoning lot. Each square foot of open space per 100 square feet of floor area is referred to as one point.

(Material in brackets and italics was deleted; underlined material was added; see Exhibit E annexed to Petitioner's Exhibit 1).

15. Section 23-14 of the ZR was amended as follows;

In all districts, as indicated, * * * for any [*building on a*] zoning lot, the minimum required open space or open space ratio shall not be less than set forth in this Section, * * *
[*Any building in*] <u>In</u> addition to complying with the provisions of this Section, <u>all zoning lots</u> shall be subject to the provisions set forth in Section 23-22 * * *

Section 23-141 was also amended as follows;

Except as otherwise provided in paragraph (a) of Section 23-147 (For non-profit residences for the elderly), in the districts indicated, the maximum required open space or open space ratio, the maximum lot coverage and the maximum floor area for any [*building on a*] zoning lot shall be set forth in the following tables: * * *

(Material in brackets and italics was deleted; underlined material was added; see Exhibit F annexed to Petitioner's Exhibit 1).

16. Section 23-142 was amended as follows:

In R6, R7, R8 and R9 Districts * * *
in the districts indicated, the maximum required open space ratio and the maximum floor area ratio for any [*building on a*] zoning lot shall be as set forth in the following table for [*buildings*] <u>zoning lots</u> with the height factor indicated in the table. * * *

Section 23-143 was also amended as follows:

R6 R7 R8 R9
Except as otherwise provided in paragraph (a) of Section 23-147 (For non-profit residences for the elderly), in the districts indicated, for [*buildings*] <u>zoning lots</u> with height factors greater than 21, the minimum required open space ration shall be set forth in the following table: * * *

(See Exhibit G annexed to Petitioner's Exhibit 1).

17. The City Council and the Department of City Planning by enacting these amendments changing the language of the ZR are deemed to have intended a material change in the law. (See McKinney's N.Y. Statutes, Book 1, Sec. 193).

The BSA 2009 Decision on 808 Columbus Avenue

18. These changes in the ZR are significant in light of a prior decision of the BSA involving the roof top gardens at 808 Columbus Avenue, which was decided before the 2011 text amendments were enacted into law. On February 3, 2009 the BSA determined that these rooftop gardens could be counted as open space in regard to the proposed construction of the 808 Columbus Avenue building notwithstanding the fact that they were reserved for the exclusive use of the residents of that building and were not usable or accessible to the residents of the other dwelling units on the zoning lot. The decision was based on statutory construction of the ZR as it was then written. (See decision of BSA, Exhibit D annexed to Petitioner's Exhibit 1).

19. The owner of 808 Columbus Avenue (and the DOB) argued in that appeal that space on the zoning lot could be allocated to each building because the ZR referred to the words "building" and "any building" in the sections pertaining to open space calculations. The BSA accepted the owner's argument and stated the following in its decision:

> WHEREAS, the owner contends that because the applicable open space requirements are expressed with reference to a single **building**, open space can therefore be allocated among **buildings**; and
>
> WHEREAS, the owner points out that ZR 23-14 states that 'for any **building** on a zoning lot, the minimum required open space or open space ration shall not be less than set forth in the Section . . .' and ZR 23-142 likewise provides that 'in the districts indicated, the maximum ratio for any

> **building** on a zoning lot shall be as set forth in the following table . . .'" [Emphasis added].
>
> WHEREAS, the Board notes that, as each of the existing **buildings** is allocated an amount of open space that is in excess of that which would be required under the Zoning Resolution if they were located on separate zoning lots, it cannot be seen how those residents would be deprived of an equitable share of open space by the proposed building; and
>
> WHEREAS, the Board agrees that the open space proposed for the subject site does not violate the open space requirements of the Zoning Resolution; and
>
> WHEREAS, the Board finds that the proposed open space complies with the requirements of ZR 23-142 and 12-10.

(See Exhibit D at page 3, annexed to Petitioner's Exhibit 1, herein; emphasis added).

20. In reaching its decision, the BSA stated that it was based on statutory construction:

> Whereas, the Board notes that the purported intent of the Zoning Resolution is not clearly stated and that the Board is not permitted to construe the intent of the Zoning Resolution, but is limited to the 'four corners' of the statute (see McKinney's N.Y. Consol L. Statutes Sec. 94 (2008)

(Exhibit D at page 3, annexed to Exhibit 1 herein).

21. The 2009 BSA decision was not based on any prior decisions of the BSA or any body of case law regarding required open space. A perusal by Petitioner's counsel of the 473 cases on open space posted on the BSA website revealed that the 808 decision was the only case in which the BSA allocated space with reference to individual buildings rather than calculating open space for the entire zoning lot. It was the only case in which the BSA permitted an area of the zoning lot to be counted as open space notwithstanding the fact that it was not usable or accessible to all residents of dwelling units on the zoning lot. The 2009 decision, by using the building allocation method, essentially established an exception to the calculation of Minimum Required Open Space as required by the ZR. Thus the 2011text amendments, by eliminating the language which

had been used by the BSA to justify the building allocation analysis, removed this unique exception.

22. As noted above, subsequent to the 2009 BSA decision the ZR was changed in 2011. The words "building" and "any buildings" were deleted from the two sections (23-14 and 23-142) that the BSA relied upon in permitting open space to allocated among buildings, and the words "zoning lot" and "zoning lots" were substituted for the words "building" and "any building." Again, the plain language of the statute in five amended sections made it clear that calculations of maximum required open space or open space ratio, maximum lot coverage and maximum floor area could not be made with reference to "any buildings" or "building" but must be made with reference to the zoning lot. As a result of the changes in the text of the ZR, 808 Columbus Avenue became a non-conforming use and any further additions to the zoning lot would increase the non-conforming use in violation of the zoning law, as set forth in Petitioner's memorandum of law.

The BSA Hearings in the Instant Case

23. At hearings before the BSA in the instant case on April 14, 2015 and on June 23, 2015, and in letters and Memoranda filed with the BSA, Petitioner's attorneys argued repeatedly that because of the change in the plain language of the statute in the February 2011 text amendments, the amount of open space on the zoning lot (block 1852) could not be allocated with reference to buildings and must be made with reference to the entire zoning lot, thus excluding from the open space calculation the 56,851 sq. ft. of rooftop gardens at 808 Columbus Avenue that were not usable or accessible to all residents in dwelling units on the zoning lot as required by ZR 12-10. Deducting the 56,851 sq. ft. from the total open space proposed for the

zoning lot, 230,726 sq. ft (Fariello letter, *supra*, at page 5), left only 173,875 sq. ft. of open space, well below the required minimum of 230,108 sq. ft. (Fariello letter, *supra*, at page 5).

24. In support of the DOB decision upholding Respondent JHL's zoning application, JHL submitted two exhibits to the BSA which contained open space calculations that were made prior to the 2011 text amendments to the ZR. The first exhibit, Respondent's Exhibit A (annexed hereto as Petitioner's Exhibit 2), was an open space allocation made in 2006 by the architectural firm of Costas Kondylis & Partners, which was submitted to the BSA in connection with the 808 Columbus Avenue appeal. It allocated open space to each building on the zoning lot and concluded that there was sufficient open space to construct the 808 Columbus Avenue building – 233,789 sq.ft. It included as open space the two rooftop gardens proposed for 808 Columbus Avenue, which were to be reserved for the exclusive use of the residents of that building. It also included a rectangle depicting 10,000 sq. ft. of lot coverage for a future community facility building. (See Exhibit 2, page 5, Open Space Allocation Full Development).

25. The 10,000 sq. ft. rectangle on the 2006 open space allocation was purely hypothetical and could have applied to any future community facility that qualified as such under the ZR. It had nothing to do with Respondent JHL which, according to records on file with the New York State Department of Health, was actively pursuing a plan to build a replacement facility at its existing location on West 106th Street. The records of the State Department of Health also show that Respondent JHL received contingent approval from the State for its replacement facility on West 106th Street in September 2008, and was actively attempting to comply with the contingencies throughout 2008 and in early 2009 when the BSA decided the 808 Columbus Avenue appeal. Thus, the BSA 808 ruling had nothing to do with Respondent JHL and Respondent JHL had no connection with the 808 appeal at the time it was decided.

26. The hypothetical rectangle on the 2006 open space allocation did not confer any vested interest upon Respondent JHL. In its filings with the BSA it conceded that it had no such vested interest. However it claimed that a "legally vested condition" existed, a bogus claim, because that concept has no meaning in zoning regulations and pertains to pension plans and stock options.

27. Respondent JHL introduced a second open space allocation as an exhibit (Exhibit B, submitted herewith as Petitioner's Exhibit 3), which was dated November 15, 2011. Although the ZR had been amended in February 2011 to eliminate the words "building" and "any buildings" (the basis of the 2009 BSA decision), the November 2011 open space allocation was based upon allocating open space with reference to each building on the zoning lot rather than calculating the minimum open space for the entire zoning lot as required by the amended ZR. The calculations were slightly different than the calculations made in the 2006 allocation because the size of the proposed community facility was reduced from 10,000 sq. ft. to 9605 sq. ft., but the method of calculation was the same. Again, the rooftop gardens at 808 Columbus Avenue were counted by Respondent JHL as open space although they were not usable or accessible to all residents in dwelling units on the zoning lot.

28. Significantly, the calculations made by Commissioner Fariello in determining that there was sufficient open space on the zoning lot to construct the proposed nursing facility were identical to the calculations in Respondent JHL's November 15, 2011allocation, thus confirming that Commissioner Fariello had counted as open space the inaccessible rooftop gardens at 808 Columbus Avenue (See Petitioner's Exhibit 3, Open Space Allocation SK-1, Legend, Rooftop Open Space Portion A1; see also Petitioner's Exhibit 1 – Exhibit B, ZD1 "Zoning site plan diagram" filed by JHL with DOB on 12/4/13, with roof top gardens cross-hatched).

29. In his decision denying the stakeholders' challenge to Respondent JHL's zoning application, Commissioner Fariello specifically stated, "From our review of the zoning plans, dated April 9, 2014, submitted to the Department for the foundation approval of the new building, the minimum open space required for the zoning lot is 230,108 sq. ft. . . ." This was the same number posited in Respondent JHL's November 2011 open space allocation; the other numbers used by Commissioner Fariello were also taken from JHL's allocations, which were based upon allocating open space with reference to each building, which was no longer permissible under the amended ZR.

30. Commissioner Fariello's decision was erroneous as a matter of law and should have been reversed by the BSA. The February 2011 text amendments to the ZR require that open space be calculated with reference to the entire zoning lot and cannot be calculated with reference to "buildings" or "any building." There is no legal justification or theory of statutory construction under the current zoning law for counting as open space an area on the zoning lot that is reserved for the exclusive use of the residents of one building. In ruling on the stakeholders' challenge to Respondent JHL's zoning application, Commissioner Fariello failed to apply the law as it existed when JHL's zoning plans, dated April 9, 2014, were submitted to DOB for the foundation approval of the new building. Instead, Commissioner Fariello based his decision on open space allocations that were made by Respondent JHL under the prior language of the ZR that was deleted by the 2011 text amendments.

Commissioner Fariello's Decision was Arbitrary and Capricious as well as Illegal

31. Commissioner Fariello's decision was inconsistent with two earlier DOB open space determinations involving Respondent JHL's plans to construct the proposed nursing facility.

In a zoning determination made by Executive Zoning Specialist Jed Weiss on August 27, 2012, DOB approved JHL's plans to make two areas on the zoning lot, a child's play area and a meditation garden, accessible to all residents on the zoning lot:

> With respect to the applicant's stated purpose that the "child's play area" and "Meditation Garden" (as shown on attached plan SK-5A) will be fenced and entry to those spaces will be controlled as *every resident of the zoning lot will be provided with a key card to access these spaces,* the applicant is correct that such arrangement does not violate the requirement that "open space" be "accessible to and usable by all persons occupying a dwelling unit on the zoning lot."

(See Petitioner's Exhibit 1, Exhibit I at page 4; emphasis added).

32. In a second zoning determination on August 31, 2012, Commissioner Fariello approved Respondent JHL's application to include its own roofed open space for the proposed building as part of the required open space calculation:

> The request to confirm that the proposed roofed "open space" conforms to the definition of open space as per 12-10 ZR is hereby approved with the following conditions:
> 1. the entire open space including the covered roofed area that is used to meet the requirements of ZR 12-10 "Open Space" shall be *accessible and usable to all persons occupying the residential units on the zoning lot at all times.*

(See Petitioner's Exhibit 1, Exhibit H at page 4, emphasis added).

33. In light of two prior DOB determinations requiring Respondent JHL to make accessible the child's play area, the meditation garden and the roofed open space (decided by Commissioner Fariello himself), the decision of Commissioner Fariello to deny the stakeholders' challenge to Respondent's open space calculation without even considering their argument that the two inaccessible roof top gardens at 808 Columbus Avenue must be excluded, was arbitrary and capricious as well as a failure to apply current law. It was arbitrary and capricious for DOB to require Respondent JHL to make three areas on the zoning lot accessible to all residents on the

zoning lot at all times, but to deny access to all residents on the zoning lot of a portion of the zoning lot comprising 56,851 sq. ft. of space that is reserved for the exclusive use of the residents of a single building.

34. The arbitrary and capricious nature of Commissioner Fariello's decision to deny the stakeholders' challenge to the open space calculation, in addition to his failure to apply the current law, is another reason why his decision, and the Resolution of the BSA affirming his decision, should be reversed by this Court.

The BSA Resolution Below

35. On August 18, 2015 the four Respondent Commissioners of the BSA voted to deny Petitioner's appeal. On October 22, the BSA issued its Resolution affirming the denial of Petitioner's appeal (Petitioner's Exhibit 4). Petitioner seeks an order of certiorari to reverse this Resolution. As Petitioner's Memorandum of Law will demonstrate, this Resolution ignored the arguments made by Petitioner with respect to the change in language of the ZR, failed to analyze the issue of statutory construction which was the basis of its 2009 decision, erroneously stated that no evidence had been presented to support Petitioner's assertion that that the Key Terms text amendment changed the text in any way, failed to apply the current law and the plain meaning of the ZR, and is in conflict with well-established judicial precedents and basic principles of statutory construction.

Depictions of the Proposed Nursing Home and the Roof Top Gardens

36. Petitioner annexed as an exhibit to a letter to the BSA an architect's rendering of the proposed nursing home, showing how it overshadowed the surrounding Park West Village buildings (784 and 788 Columbus Avenues) (Petitioner's Exhibit 5). Petition displayed

photographs of the roof top gardens at the first hearing before the BSA on April 14, 2015 (Petitioner's Exhibit 6).

37. No prior application for the relief sought herein has been made to this Court.

WHEREFORE, Petitioner requests that this Court issue an Order of Certiorari:

(1) Reversing the Resolution of the BSA which denied Petitioner's appeal of the decision of DOB denying Petitioner's challenge to the open space calculations for Respondent JHL's proposed nursing facility;

(2) Annulling the DOB zoning determination which erroneously decided that there was sufficient required minimum open space to permit Respondent JHL to construct the proposed nursing facility;

(3) Granting such other and further relief as the Court deems just and proper.

Dated: New York, New York
November 16, 2015

Respectfully submitted,

Joel Kupferman, Esq.

New York Environmental Law Project
225 Broadway, Suite 2625
New York, New York 10007-3094
212-334-5551

Attorney for Petitioner

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

In the Matter of the Application of MAGGI PEYTON,
Petitioner,

For an Order of Certiorari Pursuant to New York City Administrative Code Ch.2 – Sec. 25 – 207

-against-

NEW YORK CITY BOARD OF STANDARDS and APPEALS
Margery Perlmutter, Chair; Susan M. Hinkson, Vice-Chair; Eileen Montanez, Commissioner; and Dora Ottley-Brown, Commissioner; The New York City Board of Standards and Appeals; Jewish Home Lifecare, Inc., and PWV Acquisition, LLC.,
Respondents.

Index No.

VERIFICATION OF PETITION

STATE OF NEW YORK, COUNTY OF NEW YORK, ss:

MAGGI PEYTON, being duly sworn, deposes and says:

I am the Petitioner in this proceeding. I state that the foregoing Petition for an Order of Certiorari is true to my own knowledge, except as to matters therein stated to be alleged on information and belief, and as to those matter, I believe them to be true.

Respectfully submitted this 16 day of November 2015

Maggi Peyton

MAGGI PEYTON

Subscribed and sworn to before me this
16 day of November 2015

Myrna Hall

Notary Public

MYRNA HALL
Notary Public, State of New York
No. 31-4800992
Qualified in New York County
Commission Expires Feb. 28, 2018