Pamela Equities Corp. v Environmental Control
2017 NY Slip Op 32167(U)
October 12, 2017
Supreme Court, New York County
Docket Number: 162661/2015
Judge: Lucy Billings

SUPREME COURT OF THE STATE OF NEW YORK
NEW YORK COUNTY

PRESENT: _____ J.S.C. **PART** 44
Justice

Index Number : 162661/2015
PAMELA EQUITIES CORP.
vs
ENVIRONMENTAL CONTROL
Sequence Number : 001
ARTICLE 78

INDEX NO. _____
MOTION DATE _____
MOTION SEQ. NO. _____

The following papers, numbered 1 to _____ **, were read on this motion to/for** reverse respondents' determinations

Notice of Motion/Order to Show Cause — Affidavits — Exhibits petition _____ **No(s).** 1 - 11

Answering Affidavits — Exhibits _____ **No(s).** 23 - 42

Replying Affidavits _____ **No(s).** 47

Upon the foregoing papers, it is ordered ~~that this motion is~~ and adjudged that:

The court grants the petition to the extent set forth and otherwise denies the petition and dismisses this proceeding, pursuant to the accompanying decision. C.P.L.R. §§ 7803(3), 7806.

MOTION/CASE IS RESPECTFULLY REFERRED TO JUSTICE FOR THE FOLLOWING REASON(S): _____

Dated: 10/12/17

_____, J.S.C.

1. **CHECK ONE:** ..... ☑ **CASE DISPOSED** ☐ **NON-FINAL DISPOSITION**
2. **CHECK AS APPROPRIATE:** .....**MOTION IS:** ☐ **GRANTED** ☐ **DENIED** ☑ **GRANTED IN PART** ☐ **OTHER**
3. **CHECK IF APPROPRIATE:** ..... ☐ **SETTLE ORDER** ☐ **SUBMIT ORDER**
☐ **DO NOT POST** ☐ **FIDUCIARY APPOINTMENT** ☐ **REFERENCE**

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK: IAS PART 46
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In the Matter of the Application of

PAMELA EQUITIES CORP., Index No. 162661/2015

Petitioner

- against - DECISION AND ORDER

ENVIRONMENTAL CONTROL BOARD OF THE CITY OF NEW YORK and NEW YORK CITY DEPARTMENT OF BUILDINGS,

Respondents

----------x

APPEARANCES:

For Petitioner
Daniel E. Katz Esq.
Rich, Intelisano & Katz. LLP
915 Broadway, New York, NY 10010

For Respondents
Pamela A. Koplik, Assistant Corporation Counsel
New York City Law Department
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LUCY BILLINGS, J.S.C.:

Petitioner, the owner of 132 East 45th Street, New York County, challenges an Appeal Decision and Order by respondent Environmental Control Board of the City of New York (ECB) imposing discretionary civil penalties of $1,000 per day for 45 days pursuant to New York City Administrative Code § 28-202.1. C.P.L.R. § 7803(3) and (4). ECB added these daily penalties totalling $45,000 to its non-discretionary, set civil penalties of $5,800 in the ECB Buildings Penalty Schedule, 1 R.C.N.Y. § 102-1(g), for illegal conversion of apartments 4G and 9C in

petitioner's building from permanent residences to transient use, in violation of Administrative Code §§ 28-210.3 and 28-301.1.

I. THE APPLICABLE STATUTES AND REGULATIONS

Administrative Code § 28-210.3 provides that:

> It shall be unlawful for any person or entity who owns or occupies a multiple dwelling or dwelling unit classified for permanent residence purposes to use or occupy, offer or permit the use or occupancy or to convert for use or occupancy such multiple dwelling or dwelling unit for other than permanent residence purposes.

Administrative Code § 28-301.1 provides that: "The owner shall be responsible at all times to maintain the building . . . in a safe and code-compliant manner . . . ."

Administrative Code § 28-201.2.1(16) classifies a "violation of section 28-210.3 that involves more than one dwelling unit or a second or subsequent violation of section 28-210.3 by the same person at the same dwelling unit or multiple dwelling" as a Class 1 immediately hazardous violation. See 1 R.C.N.Y. § 102-01(b)(1). Administrative Code § 28-202.1(1) sets forth the civil penalties for immediately hazardous violations: "not less than one thousand dollars nor more than $25,000 . . . for each violation. In addition . . . , a separate additional penalty may be imposed of not more than $1,000 for each day that the violation is not corrected." 1 R.C.N.Y. § 102-01(g)(1) specifies that the daily penalties:

> will accrue at the rate of $1,000 per day for a total of forty-five days running from the date of the Commissioner's order to correct set forth in the NOV [Notice of Violation], unless the violating condition is proved . . . at the hearing to have been corrected prior to the end of that forty-five day period, in which case the daily penalties will accrue for every day up to the date of that proved correction.

III. STANDARDS FOR JUDICIAL REVIEW

The court may overturn respondents' determinations only if they were arbitrary, lacked a rational basis in the administrative record, or lacked a basis in law. C.P.L.R. § 7803(3); Rossi v. New York City Dept. of Parks & Recreation, 127 A.D.3d 463, 473 (1st Dep't 2015); Nestle Waters N. Am., Inc. v. City of New York, 121 A.D.3d 124, 127 (1st Dep't 2014); 20 Fifth Ave., LLC v. New York State Div. of Hous. & Community Renewal, 109 A.D.3d 159, 163 (1st Dep't 2013); Langham Mansions, LLC v. New York State Div. of Hous. & Community Renewal, 76 A.D.3d 855, 857 (1st Dep't 2010). See London Terrace Gardens L.P. v. New York State Div. of Hous. & Community Renewal, 149 A.D.3d 521, 521 (1st Dep't 2017). ECB's interpretation of the regulations and statutes governing the maintenance, use, occupancy, and safety of buildings in New York City that ECB is charged with enforcing, N.Y.C. Charter § 1049-a(c)(1), is entitled to deference as long as that interpretation is rational and consistent with governing law. Barenboim v. Starbucks Corp., 21 N.Y.3d 460, 470-71 (2013); Chesterfield Assoc. v. New York State Dept. of Labor, 4 N.Y.3d 597, 604 (2005); Nestle Waters N. Am., Inc. v. City of New York, 121 A.D.3d at 127. See Murphy v. New York State Div. of Hous. & Community Renewal, 21 N.Y.3d 649, 654-55 (2013); Lighthouse Pointe Prop. Assoc., LLC v. New York State Dept. of Envtl. Conservation, 14 N.Y.3d 161, 176-77 (2010); Roberts v. Tishman Speyer Props., L.P., 13 N.Y.3d 270, 285-86 (2009). Although the court need not defer to ECB's expertise or interpretation when

discerning the plain meaning of a statute or regulation, ATM One v. Landaverde, 2 N.Y.3d 472, 476-77 (2008); Associated Mut. Ins. Coop. v. 198, LLC, 78 A.D.3d 597, 598 (1st Dep't 2010); Smith v. Donovan, 61 A.D.3d 505, 508-509 (1st Dep't 2009); Sombrotto v. Christina W., 50 A.D.3d 63, 69 (1st Dep't 2008), when the terms of the statute or regulation are ambiguous and susceptible to conflicting interpretations, the court will accord deference to ECB's interpretation and uphold it as long as it is reasonable. Golf v. New York State Dept. of Soc. Servs., 91 N.Y.2d 656, 667 (1998); Chin v. New York City Bd. of Stds. & Appeals, 97 A.D.3d 485, 487 (1st Dep't 2012); Espada 2001 v. New York City Campaign Fin. Bd., 59 A.D.3d 57, 64 (1st Dep't 2008).

IV. THE UNDISPUTED FACTS DICTATE A REDUCTION OF THE DISCRETIONARY PENALTIES.

Following petitioner's administrative appeal of the ECB hearing officer's recommended Decision and Order, respondents' Appeal Decision and Order imposed three non-discretionary, set civil penalties totalling $5,800. Of that amount, $3,200 was for petitioner's violation of Administrative Code § 28-210.3, $1,000 for its violation of Administrative Code § 28-301.1, and $1,600 for its violation of New York City Building Code § 907.2.8, which specifies requirements for fire alarm systems in buildings occupied by transients. Thus only one violation was of Administrative Code § 28-210.3, an immediately hazardous violation subject to the additional discretionary daily penalties if it involved "more than one dwelling unit or a second or subsequent violation of section 28-210.3 by the same person at

the same dwelling unit or multiple dwelling." N.Y.C. Admin. Code § 28-210.3.

The parties do not dispute that petitioner's violations involved more than one dwelling unit, apartments 4G and 9C, but no evidence indicates that the violations were second or subsequent violations. The parties agree further that "the date of the Commissioner's order to correct set forth in the NOV" citing Administrative Code § 28-210.3 was October 23, 2014. 1 R.C.N.Y. § 102-01(g)(1). Thus the 45 days of potential daily penalties ran until December 7, 2014. Respondents also admit that petitioner showed at the ECB administrative hearing that by November 30, 2014, the tenant and occupants of apartment 4G had vacated the apartment, so that the transient use was corrected. At least by that point, the immediately hazardous violation of Administrative Code § 28-210.3 no longer involved "more than one dwelling unit," nor was the violation ever "a second or subsequent violation of Administrative Code § 28-210.3 by the same person at the same dwelling unit or multiple dwelling." N.Y.C. Admin. Code § 28-210.3.

Consequently, pursuant to 1 R.C.N.Y. § 102-01(g)(1), petitioner proved at the hearing that the violating condition involving "more than one dwelling unit," N.Y.C. Admin. Code § 28-210.3, had been corrected seven days before the end of 45 days from October 23, 2014, the date of the order to correct in the NOV. Based on these facts, 1 R.C.N.Y. § 102-01(g)(1) further dictates that the daily penalties may accrue only up to the date

of that proved correction. ECB's determination that petitioner did not prove that the violating condition had been corrected before February 10, 2015, when the tenants and occupants of apartment 9C vacated that apartment, is inconsistent with Administrative Code § 210.3 and 1 R.C.N.Y. § 102-01(g)(1) and thus arbitrary. C.P.L.R. § 7803(3). Therefore petitioner is entitled at minimum to a $7,000 reduction in the $45,000 discretionary penalties.

V. PETITIONER'S ADDITIONAL CLAIMS

A. Enforcement Against the Owner Versus Enforcement Against the Tenants

In a nutshell, petitioner insists that no discretionary penalties were warranted because it showed its unawareness of its tenants' unlawful subleasing for transient use and that even penalties of $38,000 are disproportionate to its unknowing violation. Petitioner emphasizes that Administrative Code § 28-210.3 prohibits "any person or entity who owns or occupies a . . . dwelling unit classified for permanent residence purposes to use or occupy, offer or permit the use or occupancy or to convert for use of occupancy such . . . dwelling unit for other than permanent residence purposes." N.Y.C. Admin. Code § 28-210.3 (emphasis added). Thus the prohibition extends to tenants subleasing their apartments for transient use and to their subtenants occupying the apartments for transient use.

The fact that other violators might be penalized, however, does not absolve apartment owners of their affirmative obligation to "be responsible at all times to maintain the building . . . in

a . . . code-compliant manner." N.Y.C. Admin. Code § 28-301.1. The prospect of daily penalties even for unknowing violations encourages owners' proactive efforts to know what is occurring in their buildings, to assure compliance with the Administrative Code, and to discover and correct immediately hazardous violations promptly. Contrary to petitioner's suggestion that the short term rental of only two units is not an immediately hazardous condition, the law so classifies such conduct. A repeated violation of Administrative Code § 28-210.3 is classified as immediately hazardous because transient use threatens the public interest in preserving permanent housing. 1 R.C.N.Y. § 102-01(b)(1).

Petitioner protests that the administrative record lacks any evidence of petitioner's wrongdoing, but the undisputed fact that petitioner violated Administrative Code § 28-210.3 in two apartments at the same time evinces the owner's lax oversight of the apartments' use. The two apartments are within a building of 94 apartments, to be sure, but a larger building imposes greater responsibilities on its owner. Even if the wrongdoing was unknowing and unintentional and only negligent, the potential daily penalties deter even negligent conduct. Neither ECB nor the court need conclude that, because petitioner did not know of the transient use, petitioner ought not to have known.

In sum, while petitioner maintains that respondents' enforcement of Administrative Code §§ 28-202.1(1) and 28-210.3 does not target the wrongdoer, their enforcement against the

building owner does target one wrongdoer, just not both: the owner and its tenant. Enforcement against the tenant is for the legislature and for the owner to address, as discussed below.

Notably, petitioner expressly disavows any claim of respondents' selective enforcement of Administrative Code § 28-202.1(1) or § 28-210.3. See 303 West 42nd St. Corp. v. Klein, 46 N.Y.2d 686, 693, 695-96 (1979); Fields v. Village of Sag Harbor, 92 A.D.3d 718, 719 (2d Dep't 2012); Liberty v. New York State & Local Employees' Retirement Sys., 85 A.D.3d 1285, 1288 (3d Dep't 2011); Sonne v. Board of Trustees of Vil. of Suffern, 67 A.D.3d 192, 203-204 (2d Dep't 2009). In any event, the record does not show that petitioner and its tenants are similarly situated: that their non-compliant conduct is similar or that enforcing these statutes will be similarly effective against each group, for example. Bower Assoc. v. Town of Pleasant Val., 2 N.Y.2d 617, 631-32 (2004); Dezer Entertainment Concepts, Inc. v. City of New York, 8 A.D.3d 37, 38-39 (1st Dep't 2004). See 303 West 42nd St. Corp. v. Klein, 46 N.Y.2d at 693; Fields v. Village of Sag Harbor, 92 A.D.3d at 719; Sonne v. Board of Trustees of Vil. of Suffern, 67 A.D.3d at 203-204. Nor does the record show that the selective enforcement against owners is based deliberately on an impermissible standard such as their status within a protected class, their exercise of a fundamental right, or another invidious motive such as personal or political gain, unrelated to effective enforcement of the prohibition against transient use. C/S 12th Ave. LLC v. City of New York, 32 A.D.3d 1, 9-10 (1st

Dep't 2006); Dezer Entertainment Concepts, Inc. v. City of New York, 8 A.D.3d at 38-39. See 303 West 42nd St. Corp. v. Klein, 46 N.Y.2d at 693, 695-96; Fields v. Village of Sag Harbor, 92 A.D.3d at 719; Sonne v. Board of Trustees of Vil. of Suffern, 67 A.D.3d at 203-204.

Respondents' enforcement against building owners and not tenants or occupants derives from Administrative Code § 28-204.6.3, which authorizes respondent New York City Department of Buildings to issue NOVs only to building owners. Even were petitioner to so claim, this statute does not impermissibly discriminate against building owners in favor of the buildings' tenants or occupants simply because the statute may be underinclusive or fail to address all causes of transient use. New York State Assn. for Affordable Hous. v. Council of the City of N.Y., 141 A.D.3d 208, 217 (1st Dep't 2016).

B. Factors to Be Considered in Assessing Penalties

Nevertheless, there are factors that bear on the extent of the owner's laxity, negligence, or other wrongdoing in carrying out its responsibility to maintain a code-compliant building, N.Y.C. Admin. Code § 28-301.1, to be taken into account when respondents assess discretionary penalties. One consideration is the owner's efforts to assure its tenants' compliance with the prohibition against transient use: conspicuous provisions in their leases that such use constitutes a default and will lead to termination of the tenancy and written warnings distributed to tenants and posted in the building, for example. A second,

related consideration is the owner's efforts to discover transient use, by monitoring the entry and egress of occupants who are not tenants' household members, for example. A third consideration is the owner's prompt corrective action once the transient use is discovered.

Here, the record is bereft of evidence regarding these first two considerations. Regarding corrective action, where the violation involves a tenant's conduct, and an owner must initiate an eviction proceeding to correct the violation, the process may be impossible to complete before the end of 45 days after receipt of the NOV, if it constitutes the owner's discovery of the violating condition. If the owner has discovered the violating condition before receiving the NOV, then correction may be possible sooner after the receipt, but here the record lacks any evidence or finding that petitioner discovered either violating condition before receipt of the NOV dated October 23, 2014, as well as any evidence or finding of the violating conditions before that date.

Not until 32 days later, on November 24, 2014, however, did petitioner serve a notice of termination of the tenancy of apartment 4G as a condition precedent to initiating an eviction proceeding. V. Pet. ¶ 16 and Ex. D; V. Answer ¶ 94 and Ex. G. While no evidence discloses any further delays in the eviction proceeding attributable to petitioner, this delay is unexplained and extended over two thirds of the 45 days for which respondents assessed their penalties and over almost 85% of the 38 days to

which the court has reduced the penalties. To petitioner's credit, the notice of termination did result in the tenants' departure and hence correction of the violation six days later, but that result also demonstrates, on the other hand, that a prompter notice of termination might have produced a prompter cure of the violation.

Petitioner did react more promptly regarding apartment 9C. Petitioner waited 12 days before serving a notice of termination of the tenancy of apartment 4G on November 4, 2014. V. Pet. ¶ 16 and Ex. D; V. Answer ¶ 94 and Ex. G. Again no evidence discloses any further delays in the eviction proceeding attributable to petitioner, but the delay of 11 days is still significant and unexplained, and the tenants' departure more than two months after the 45 days demonstrates that initiation of an eviction proceeding may not be expected to produce a prompt correction of the violation. Therefore it was incumbent on the owner to take as prompt action as possible regarding both apartments to effect the correction in even one apartment.

C. Disproportionality

Using petitioner's initiation of corrective action against both apartments as of November 24, 2014, as a measure in assessing the penalties, the determination boils down to whether the penalties assessed after that date are disproportionate to petitioner's misconduct because, beginning then, petitioner was taking all actions possible to eliminate the violation. Kelly v. Safir, 96 N.Y.2d 32, 38 (2001); Silverman v. Carrion, 146 A.D.3d

570, 571 (1st Dep't 2017); Asch v. New York City Bd./Dept. of Educ., 104 A.D.3d 415, 421 (1st Dep't 2013); Konstas v. Environmental Control Bd. v. City of N.Y., 104 A.D.3d 689, 690 (2d Dep't 2013). The harm to the public, based on the legislative purpose underlying Administrative Code § 28-210.3, however, continued until November 30, 2014.

Petitioner also points out that it did not profit from its tenants' transient use of their apartments, but the owner's profit from a code violation bears little relation to the hazard that the violation creates, here a reduction of the permanent housing stock and a further violation of requirements for the building's fire alarm system. On the other hand, the violation and petitioner's associated conduct do not display any "grave moral turpitude" or "grave injury . . . to the public." Kelly v. Safir, 96 N.Y.2d at 39. See Inglese v. LiMandri, 89 A.D.3d 604, 605 (1st Dep't 2011).

The court may overturn the penalty imposed by respondents' Appeal Decision and Order following the ECB hearing officer's recommendation only if the penalties are so disproportionate to the violation and to petitioner's misconduct as to shock the conscience or a sense of fairness. Harris v. Mechanicville Cent. School Dist., 45 N.Y.2d 279, 284-85 (1978); Brito v. Walcott, 115 A.D.3d 544, 546 (1st Dep't 2014). See Russo v. New York City Dept. of Educ., 25 N.Y.3d 946, 948 (2015); Kelly v. Safir, 96 N.Y.2d at 38; Silverman v. Carrion, 146 A.D.3d at 571; Asch v. New York City Bd./Dept. of Educ., 104 A.D.3d at 421. The hearing

officer typically is in a "far superior position" than the court in reviewing the hearing record to assess a penalty warranted by the record, since the hearing officer observed and heard the witnesses' testimony. Asch v. New York City Bd./Dept. of Educ., 104 A.D.3d at 421. See City School Dist. of City of New York v. McGraham, 17 N.Y.3d 917, 920 (2011).

Here, however, neither the hearing officer's recommendation nor respondents' final decision reflects any consideration or balancing of factors bearing on the proportionality of the discretionary penalties to be assessed. Nor did petitioner present any such factors in its favor. Petitioner simply challenged the assessment of discretionary penalties altogether because it was unaware of the violations and they implicated the tenants' misconduct. The hearing officer and respondents mechanically assessed the maximum discretionary penalties by rote, resulting in their failure to consider the correction of the second violation before the end of the maximum 45 days of daily penalties. The hearing officer and respondents likewise failed to consider the extent of harm to the public from the transient use of petitioner's apartments or that petitioner engaged in no conduct exhibiting poor moral character, derived no profit from the transient use, and as of November 24, 2014, was taking all actions possible to eliminate the violations. Kelly v. Safir, 96 N.Y.2d at 38-39; Inglese v. LiMandri, 89 A.D.3d at 605; Konstas v. Environmental Control Bd. v. City of N.Y., 104 A.D.3d at 690.

Nevertheless, petitioner's lack of expedient steps to correct the violations would not permit reduction of the discretionary penalties to any date earlier than November 24, 2014. While respondents' mechanical assessment of the maximum discretionary penalties by rote is not to be condoned, even if the above factors were to be considered by respondents, the assessment of six more days of daily penalties, until November 30, 2014, would not abuse their discretion. BarFreeBedford v. New York State Liq. Auth., 130 A.D.3d 71, 77-78 (1st Dep't 2015); South Bronx Unite! v. New York City Indus. Dev. Agency, 115 A.D.3d 607, 610 (1st Dep't 2014); Che Lin Tsao v. Kelly, 28 A.D.3d 320, 321 (1st Dep't 2006). See Russo v. New York City Dept. of Educ., 25 N.Y.3d at 948; Kelly v. Safir, 96 N.Y.2d at 38-39; Silverman v. Carrion, 146 A.D.3d at 571; Asch v. New York City Bd./Dept. of Educ., 104 A.D.3d at 421. In Konstas v. Environmental Control Bd. v. City of N.Y., 104 A.D.3d at 690, for example, the court upheld a $25,000 penalty for illegal conversion of a residence for occupancy by more than the authorized number of families. Although this violation appears more hazardous than petitioner's violation, in upholding the penalty, the court did not conclude that a higher penalty would have been impermissible.

Here, petitioner provides no basis to conclude that $32,000 in penalties is permissible but $38,000 is an abuse of discretion. Therefore the court limits its reduced penalties to $38,000. ECB's determination to assess discretionary penalties

beyond the date that the violating condition was corrected is consistent with Administrative Code §§ 28-202.1(1) and 28-210.3 and 1 R.C.N.Y. § 102-01(g)(1) and thus rational, with a sound basis in the law. C.P.L.R. § 7803(3). Even if the statutes or regulation allow lesser discretionary penalties, the alternative dates at which to end the penalties requires the court to give ECB's assessment deference and uphold it as reasonable. See Golf v. New York State Dept. of Soc. Servs., 91 N.Y.2d at 667; Chin v. New York City Bd. of Stds. & Appeals, 97 A.D.3d at 487; Espada 2001 v. New York City Campaign Fin. Bd., 59 A.D.3d at 64.

VI. CONCLUSION

The determination of this proceeding thus turns on whether respondents' interpretation and application of the Administrative Code and its implementing regulations were erroneous and not any material dispute concerning the evidentiary support for respondents' administrative determinations. Although the petition claims otherwise, petitioner now maintains that its basis for vacatur of the discretionary penalties is not that respondents' determinations are unsupported by substantial evidence. Nor do respondents identify any outstanding issue whether substantial evidence supports their determinations that requires a transfer of this proceeding to the Appellate Division. C.P.L.R. §§ 7803(4), 7804(g); Silverman v. Carrion, 146 A.D.3d at 571; Joseph Paul Winery, Inc. v. State of New York, 135 A.D.3d 639, 639 (1st Dep't 2016); Dillin v. Waterfront Commn. of N.Y. Harbor, 119 A.D.3d 429, 429 (1st Dep't 2014); Earl v. Turner, 303

A.D.2d 282, 282 (1st Dep't 2003).

For the reasons explained above, the court grants the petition to the following extent. C.P.L.R. §§ 409(b), 7803(3), 7806. The court vacates ECB's determination finding that petitioner failed to prove that the violating condition had been corrected before February 10, 2015, because that determination is unsupported by and contrary to Administrative Code § 210.3 and 1 R.C.N.Y. § 102-01(g)(1) and thus arbitrary. C.P.L.R. § 7803(3). Therefore ECB's assessment of penalties from November 30, 2014, when the condition was corrected, to December 7, 2014, is contrary to Administrative Code § 210.3 and 1 R.C.N.Y. § 102-1(g)(1), is arbitrary, and must be vacated.

Within 30 days after entry of this order, respondents shall remit all discretionary penalties that petitioner paid in excess of $38,000 for the violations cited October 23, 2014. If respondents fail to pay petitioner as required, it may enter a judgment against respondents for $7000. The court otherwise denies the petition and dismisses this proceeding. C.P.L.R. §§ 409(b), 7803(3), 7806.

DATED: October 12, 2017

LUCY BILLINGS, J.S.C.

LUCY BILLINGS
J.S.C.