

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

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THE PEOPLE OF THE STATE OF NEW YORK, BY
LETITIA JAMES, ATTORNEY GENERAL OF THE
STATE OF NEW YORK,

Petitioner,

VERIFIED PETITION

-against-

Index No. _____

JOHN ANDERSON,
921 FULTON ST. CORP.

IAS Part

Respondents.

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1. Respondent John Anderson (“Anderson”) is the Chief Executive Officer of 921 Fulton St. Corp., the owner of 1075 Dean Street, Brooklyn, New York, a property that on April 22, 2016, was administratively found to be covered by the rent stabilization laws. Anderson and 921 Fulton St. Corp. are collectively referred to as Respondents.
2. Despite the rent stabilization coverage, Anderson failed to register any apartments in the building with the New York State Division of Housing and Community Renewal (“DHCR”) as required by law. Registration is important as it is how tenants determine if they are protected by the rent stabilization laws and is how their rents get established.
3. The New York State Office of the Attorney General (“OAG”) has provided Anderson several opportunities to come into compliance with the law, with the last opportunity hand delivered to Respondent’s home on February 4, 2026. Unfortunately, Anderson has refused to comply after repeated requests by the OAG to come into compliance.
4. The OAG brings this proceeding under the [New York State Executive Law § 63\(12\)](#) to enjoin Respondent’s from violating the rent stabilization laws, multiple dwelling law, and tenant harassment laws; direct Respondents into complying with the rent

stabilization and multiple dwelling laws; and pay penalties, fees, and restitution for Respondents' repeated and persistent illegal acts.

PARTIES

5. Petitioner, the People of the State of New York, is represented by its attorney, Letitia James, the Attorney General of the State of New York ("Attorney General"). The Attorney General has her principal place of business at 28 Liberty Street, New York, NY 10005, in New York County.
6. Respondent John Anderson ("Anderson") is the former owner of 1075 Dean Street, Brooklyn, New York 11216 ("Building") and the Chief Executive Officer of 921 Fulton St. Corp., the entity Anderson transferred ownership of the Building to for \$0. Anderson resides in Brooklyn, New York.
7. Respondent 921 Fulton St. Corp. is the business entity based in New York that is owned by Anderson and holds title to the Building.
8. Anderson and 921 Fulton St. Corp. are referred to collectively as "Respondents."

JURISDICTION AND VENUE

9. The Attorney General brings this action on behalf of the People of the State of New York under the [New York State Executive Law](#) ("Exec. Law") § 63(12).
10. Under the Executive Law, the Attorney General is authorized to bring a special proceeding in this Court seeking injunctive relief, restitution, damages, disgorgement, and costs on behalf of the People of the State of New York "[w]henver any person shall engage in repeated fraudulent or illegal acts or otherwise demonstrate persistent fraud or illegality in the carrying on, conducting or transaction of business." [Exec. Law § 63\(12\)](#).

11. Venue is properly laid in New York County because the Attorney General has her principal office in New York County.
12. The Court may exercise personal jurisdiction over John Anderson because he resides and transacts business in New York.
13. The Court may exercise personal jurisdiction over 921 Fulton St. Corp. as it is a New York corporation and the owner of the land and building at 1075 Dean Street, Brooklyn, New York 11216. It maintains a business address at 540 Carlton Avenue, Brooklyn, NY 11238.

LEGAL FRAMEWORK

New York State Executive Law § 63(12)

14. Under [Exec. Law § 63\(12\)](#), the OAG is empowered to investigate underlying violations of federal, state, and local laws, governing rules and regulations, when such violations involve repeated or persistent fraud or illegality in the carrying on, conducting, or transaction of business.
15. “Illegality” as used in [Exec. Law § 63\(12\)](#) includes violations of federal, state, and local laws and regulations. This includes violations of rent stabilization law. See e.g., [State v. Winter](#), 121 A.D.2d 287 (1st Dep’t 1986); [State v. Solil Management Corp.](#), 128 Misc.2d 767 (Sup. Ct. N.Y. Cty. 1985) aff’d 114 A.D.2d 1057 (1st Dep’t 1985).

Rent Stabilization in NYC

16. In New York City, the laws regulating rent-stabilized tenancies are set forth primarily in the Rent Stabilization Law (hereinafter “RSL”), codified at [Chapter 4 of Title 26 of the New York City Administrative Code](#) (hereinafter “NYC Admin. Code”), and the

- Rent Stabilization Code (hereinafter “RSC”), codified at Title 9, Subtitle S, Chapter VIII of the New York Codes, Rules and Regulations (hereinafter “NYCRR”).
17. The New York Rent Stabilization Code was enacted to “. . . prevent the exaction of unjust, unreasonable and oppressive rents and rental agreements, and to forestall profiteering, speculation and other disruptive practices” 9 NYCRR § 2520.3.
18. DHCR promulgates, interprets, and issues regulations and guidance on the rent regulation laws.
19. The RSC regulates the rents and fees collectible in units covered by rent stabilization. In addition, the RSC regulates the leases and services associated with units covered by rent stabilization.
20. The RSC prohibits owners of apartments subject to the RSC from charging, collecting, demanding, and/or receiving any rent in excess of the legal regulated rent. RSC § 2525.1.
21. Owners are required to register the initial rent charged to a tenant within 90 days of when a building becomes subject to rent stabilization. See RSC § 2528.1. The owner is then required to register the rent on an annual basis. See RSC § 2528.3. The registration of rent is intended to be a contemporaneously created history of the rent that the agency relies upon to determine the legal regulated rent. See generally LL 140 E. 78th St. LLC v. DHCR, 213 A.D. 3d 558 (1st Dep’t 2023).

De Facto Rent Stabilization

22. Buildings that were built before 1974 and originally had five (5) or fewer residential dwelling units but subsequent to January 1, 1974, had additional units added to the building that met or surpassed the six-unit threshold are subject to the RSC under the

- judicially created doctrine of “de facto” rent stabilization. Upon the creation of the sixth unit, all units become rent stabilized. See e.g., 325 Management Corp. v. Statuto, 220 A.D.3d 524 (1st Dep’t 2023) (rent stabilization turns on number of units and their use, not legality of the apartments); White Knight Ltd v. Shea, 10 A.D.3d 567 (1st Dep’t 2004) (same).
23. Even if the owner of the building subsequently reduces the number of residential dwelling units to five or fewer, the remaining units remain rent stabilized. See e.g., Matter of Shubert v. DHCR, 162.A.D.2d 261 (1st Dep’t 1990) (Deregulating based on the destruction of units “would be inconsistent with the purposes underlying the legislation regulating rents for multiple dwellings.”); Rashid v. Cancel, 9 Misc.3d 130(A) (App. Term 2d Dep’t 2005) (subsequent reduction in the number of housing accommodations do not exempt the remaining units from rent stabilization).
24. DHCR has authority to issue orders to enforce rent stabilization law and rent stabilization code. See RSC § 2526.2(a) and RSL § 26-516(b).
25. Final determinations by DHCR concerning rent stabilization are subject to *res judicata* and collateral estoppel and generally cannot be relitigated. See e.g., 9-10 Alden Place, LLC v. Chen, 279 A.D.2d 618, 619 (2d Dep’t 2001) (collateral estoppel); Joseph v. Roldan, 289 A.D.2d 243, 244 (2d Dep’t 2001) (*res judicata*); Grassini v. Paravalos, 270 A.D.2d 52, 53 (1st Dep’t 2000) (collateral estoppel); Chatsworth 72nd Street Corp. v. Rigai, 74 Misc.2d 298, 299 (App. Term 1st Dep’t 1973) aff’d 43 A.D.2d 685 (1st Dep’t 1973) aff’d 35 N.Y.2d 984 (1975) (*res judicata*).

26. This is true even if the building is sold to a new owner as “new owners step into the shoes of the prior owner ... [t]o hold otherwise would make a sham of the Rent Stabilization Law.” Charles H. Greenthal Co. v DHCR, 126 Misc.2d 795, 804 (Sup. Ct. N.Y. Cty 1984) quoting Manhattan Beach Estates Assoc. v. CAB, 8/3/81 N.Y.L.J. 14, col. 3 (Sup. Ct. Kings Cty.).
27. Once a building is rent stabilized, the Rent Stabilization Law requires several actions from owners including:
- a. annual registration of the rents and tenants for each rent stabilized apartment with DHCR under RSC § 2528.3 and RSL § 26-517;
 - b. provide tenants with rent stabilized leases and renewal leases on the same terms and conditions, and rent stabilization riders pursuant to RSC § 2522.5; and
 - c. pay the New York City Department of Finance an annual fee of \$20 for each rent stabilized unit pursuant to RSL § 26-517.1(a).

FACTUAL ALLEGATIONS

28. On January 22, 2004, Anderson bought the Building. See a true copy of the January 22, 2004, deed for 1075 Dean Street, Brooklyn, New York 11216 annexed as **Exhibit 1**.
29. On February 6, 2015, DHCR issued an administrative determination that the Building was subject to the RSC because the number of units in the Building reached six or more after January 1, 1974. See a certified copy of DHCR ORDER CM210007AD annexed hereto as **Exhibit 2**.

30. Respondent Anderson challenged the determination through an administrative appeal to DHCR called a Petition for Administrative Review (“PAR”) pursuant to RSC § 2529.1.
31. On April 22, 2016, DHCR denied Anderson’s PAR agreeing with the administrative determination that the Building was subject to the RSC because the number of units in the Building reached six or more after January 1, 1974. See a true copy of the PAR order annexed hereto as **Exhibit 3**.
32. The statute of limitations to appeal a PAR decision through filing a petition under Article 78 of the CPLR is 60 days from the order’s issuance. See RSL § 26-516(d). The statute of limitations for Anderson to appeal expired June 21, 2016.
33. Anderson did not appeal.
34. On July 17, 2017, Anderson submitted a filing with the New York City Department of Buildings (“DOB”) to reconfigure the basement and first floor of the Building into a duplex. In the filing, he falsely certified the Building was not covered by the rent stabilization laws and DOB subsequently denied the application. A true copy of the DOB filing is annexed as **Exhibit 6**.
35. Anderson transferred ownership of the Building from himself to 921 Fulton St. Corp. on December 30, 2021 for \$0. A true copy of the December 30, 2021, deed is annexed hereto as **Exhibit 4**.
36. John Anderson is the sole owner of the corporation as he is the Chief Executive Officer for 921 Fulton St. Corp. A certified copy of New York State Department of State Entity Information for 921 Fulton St. Corp. is annexed hereto as **Exhibit 5**.

37. Since the administrative order in 2015, Respondents have not complied with any of the requirements of the rent stabilization laws. For instance, Respondents failed to register the Building's apartments with DHCR despite the apartments being covered by the rent stabilization laws for over a decade. See a certified copy of DHCR rent registration for the Building annexed hereto as **Exhibit 7**.
38. Respondents have also failed to provide tenants with rent stabilized leases. For example, in John Anderson v. Crystal Johnson, [LT-309514-21/KI](#), the court issued a decision dismissing the eviction proceeding on October 16, 2023 based on Respondents' failure to provide the tenant a rent stabilized renewal lease. See a true copy of the October 16, 2023 decision annexed hereto as **Exhibit 8**.
39. In addition, from 2015 to present, Respondents have failed to pay the annual fee to the New York City Department of Finance required to be paid for all rent stabilized apartments. See a certified copy of the Department of Finance records annexed as **Exhibit 9**.
40. On August 27, 2025, OAG sent Anderson a letter by certified mail demanding he agree to comply with the rent stabilization laws by October 31, 2025, including registering the apartments in his building with DHCR. Anderson did not respond to the letter. See a true copy of the August 27, 2025, letter annexed hereto as **Exhibit 10**.
41. On September 30, 2025, OAG sent Anderson a second letter by certified mail again demanding that he agree to comply with the rent stabilization laws, including registering the apartments in his building. Like the first letter, Anderson did not respond. See a true copy of the September 30, 2025 letter is annexed hereto as **Exhibit 11**.

42. On December 17, 2025, OAG sent Anderson a third letter by certified mail and regular mail again requesting that he agree to comply with the rent stabilization laws, including registration. This time the OAG informed Anderson that if he did not respond, the OAG would explore litigation. Anderson did not respond. See a true copy of the December 17, 2025, letter is annexed hereto as **Exhibit 12**.
43. On February 4, 2026, an OAG employee physically served Anderson's home with a copy of the December 17, 2025, letter warning of litigation. Anderson did not respond.
44. In addition to Respondents failure to comply with the rent stabilization laws, they have also engaged in other illegality and fraud.
45. For instance, the Building has 115 open Housing Maintenance Code violations, and they have been sued in several cases by tenants and the City for immediately hazardous violations and/or tenant harassment. See e.g., Darryl Coleman v. John Anderson, LT-67-23/KI (repairs); Crystal Johnson v. 921 Fulton St. Corp et al., LT-538-23/KI (tenant harassment and repairs); Gregory Taylor v. John Anderson et al., LT-1791-25/KI (repairs); HPD v. Anderson, LT-322736-25/KI (repairs). True copy of the HPD violations are annexed hereto as **Exhibit 14**.
46. Upon information and belief, Anderson sent a non-attorney friend Aaron Robinson to impersonate him in court and obtain an adjournment to get more time for the case. See HPD's Notice to the Court dated November 19, 2025 annexed hereto as **Exhibit 15**.
47. Respondents have failed to register as a multiple dwelling with HPD. See **Exhibit 13**.

48. Crystal Johnson, who lives in Apartment 3 of the Building, alleges that she has faced harassment in retaliation for asking for her rent stabilized lease. The alleged harassment has included cutting off her utilities such as gas, water, and electricity. See a true copy of Crystal Johnson's affidavit annexed hereto as **Exhibit 16** and prior order finding harassment as **Exhibit 17**.

FIRST CAUSE OF ACTION

**Violations of Executive Law § 63(12) –
Repeated Violations of RSC §§ 2528.1 and 2528.3
(Failure to Register Apartments with DHCR)**

49. The Attorney General repeats and re-alleges the paragraphs above as if fully stated herein.
50. Petitioner asserts the First Cause of Action against all Respondents.
51. [Exec. Law § 63\(12\)](#) authorizes the Attorney General to bring a special proceeding when any person or entity engages in repeated illegal acts or persistent illegality in conducting of business.
52. At all relevant times, Respondents have engaged in carrying on, conducting, or the transaction of business in New York within the meaning of [Exec. Law § 63\(12\)](#).
53. Landlords are required to register all apartments subject to the RSL and RSC with DHCR at the time they first become subject to regulation and annually thereafter. [RSC §§ 2528.1, 2528.3](#), and [RSL § 26-517](#).
54. Respondents have failed to register the Building's apartments with DHCR despite DHCR finding on February 6, 2015 that the apartments in the Building became subject to the rent stabilization laws.

55. By engaging in repeated and persistent conduct that violated the rent stabilization laws, Respondents have engaged in repeated and persistent illegal conduct in violation of Exec. Law § 63(12).

SECOND CAUSE OF ACTION

Violations of Executive Law § 63(12) – Repeated Violations of RSC § 2522.5 (Failure to Provide Rent Stabilized Leases and Riders)

56. The Attorney General repeats and re-alleges the paragraphs above as if fully stated herein.
57. Petitioner asserts the Second Cause of Action against all Respondents.
58. Owners of rent stabilized leases are required to provide tenants a rent stabilized lease under RSC § 2522.5(a).
59. Owners of rent stabilized leases are required to provide tenants a rent stabilized renewal lease upon expiration of the initial lease under RSC § 2522.5(b).
60. Owners of rent stabilized leases are required to provide rent stabilization riders with leases upon each lease under RSC § 2522.5(c).
61. Respondents failed to provide tenants with rent stabilized leases, renewal leases, and riders.
62. By engaging in repeated and persistent conduct that violated the rent stabilization laws, Respondents have engaged in repeated and persistent illegal conduct in violation of Exec. Law § 63(12).

THIRD CAUSE OF ACTION

Violations of Executive Law § 63(12) – Repeated Violations of RSL § 26-517.1 (Failure to Pay Rent Stabilization Fee)

63. The Attorney General repeats and re-alleges the paragraphs above as if fully stated herein.
64. Petitioner asserts the Third Cause of Action against all Respondents.
65. Respondents are required to pay the New York City Department of Finance an annual fee of \$20 for each rent stabilized unit in Building owned by them pursuant to [RSL § 26-517.1\(a\)](#).
66. Respondents have never paid the rent stabilization fee for a unit in a Building owned by them from at least 2015 to present.
67. By engaging in repeated and persistent conduct that violated the rent stabilization laws, Respondents have engaged in repeated and persistent illegal conduct in violation of [Exec. Law § 63\(12\)](#).

FOURTH CAUSE OF ACTION

Violations of Executive Law § 63(12) – Repeated Violations of NYC Admin. Code § 27-2005(d) (Tenant Harassment)

68. The Attorney General repeats and re-alleges the paragraphs above as if fully stated herein.
69. Petitioner asserts the Fourth Cause of Action against all Respondents.
70. Pursuant to [NYC Admin. Code § 27-2005\(d\)](#), owners are prohibited from harassing tenants.
71. Harassment includes “any act or omission by or on behalf of an owner that (i) causes or is intended to cause any person lawfully entitled to occupancy of a dwelling unit to vacate such dwelling unit or to surrender or waive any rights in relation to such occupancy” and includes a rebuttable presumption of harassment through several defined acts or omissions. [See NYC Admin. Code § 27-2004\(a\)\(48\)](#).

72. NYC Admin. Code § 27-2004(a)(48)(a-1) defines tenant harassment to include, “knowingly providing to any person lawfully entitled to occupancy of a dwelling unit false or misleading information relating to the occupancy of such unit[.]”
73. Upon information and belief. Respondents have claimed the tenants are not rent stabilized to the courts, DOB, and to the tenants themselves and have failed to comply with rent stabilization law.
74. NYC Admin. Code § 27-2004(a)(48)(b) defines tenant harassment to include, “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[.]”
75. NYC Admin. Code § 27-2004(a)(48)(b-2) defines tenant harassment to include, “repeated failures to correct hazardous or immediately hazardous violations of this code or major or immediately hazardous violations of the New York city construction codes, relating to the dwelling unit or the common areas of the building containing such dwelling unit, within the time required for such corrections[.]”
76. Respondents presently have 115 violations for the Building including 29 immediately hazardous C violations and 43 hazardous violations of the housing maintenance code. **See Exhibit 14.**
77. NYC Admin. Code § 27-2004(a)(48)(b-4) defines tenant harassment to include, “engaging in repeated conduct within the building in violation of section 28-105.1 of the New York city construction codes[.]”
78. Respondents have repeatedly violated [New York City Building Code 28-105.1](#) performing illegal work without permits. The creation of illegal units lead to the

finding of rent stabilization by DHCR in 2015 and Respondents have failed to correct.

See OATH/ECB Violation Number 3915896N dated August 26, 2025; OATH/ECB Violation Number 39158595L dated August 26, 2025; and OATH/ECB Violation Number 39158593H dated August 26, 2025. See true copies of the OATH/ECB Violations annexed hereto as **Exhibit 19**.

79. By engaging in repeated and persistent conduct that violated the tenant harassment laws, Respondents have engaged in repeated and persistent illegal conduct in violation of [Exec. Law § 63\(12\)](#).

FIFTH CAUSE OF ACTION

Violations of Executive Law § 63(12) – Repeated Violations of RSC § 2525.5 (Tenant Harassment)

80. The Attorney General repeats and re-alleges the paragraphs above as if fully stated herein.

81. Petitioner asserts the Fifth Cause of Action against all Respondents.

82. Owners are prohibited from harassing tenants pursuant to [RSC § 2525.5](#).

83. “It shall be unlawful for any owner or any person acting on his or her behalf, directly or indirectly to engage in any course of conduct ... intended to cause the tenant to vacate such housing accommodation or waive or not exercise any right afforded under this Code including the right of continued occupancy and regulation under the RSC and RSL.” See [RSC § 2525.5](#).

84. Respondents have ignored their obligations to their tenants under rent stabilization such as registering rents, providing a rent stabilized lease, and other duties.

85. Respondents have been told by DHCR, the Court, and OAG that they must comply with the laws but have repeatedly failed to do so despite ample time and warnings.

86. By engaging in repeated and persistent conduct that violated RSC § 2525.5, Respondents have engaged in repeated and persistent illegal conduct in violation of Exec. Law § 63(12).

SIXTH CAUSE OF ACTION

Violations of Executive Law § 63(12) – Repeated Violations of RSC § 2525.1 (Rent Overcharge)

87. The Attorney General repeats and re-alleges the paragraphs above as if fully stated herein.
88. Petitioner asserts the Sixth Cause of Action against all Respondents.
89. The Building is covered by the rent stabilization laws and regulations.
90. Respondents have not registered the apartments with DHCR and upon information and belief have not provided rent stabilized leases to tenants.
91. To establish the legal regulated rent, the owner must add any lawful rent increases and adjustments to the rent on the base date. See RSC §§ 2526.1(a)(3) and 2526.7(c). The base date is “the date of the most recent reliable annual rent registration statement, filed and served upon a tenant six or more years prior...” See RSC § 2526.7(a).
92. If no base date can be established subsequent to June 15, 2015, the base date is June 14, 2015. If this base date cannot be established, the legal regulated rent will be set using the default formula. See RSC § 2522.6.
93. Upon information and belief, Respondents are charging tenants a rent higher than allowed under the rent stabilization laws.

94. By engaging in repeated and persistent conduct that violated the rent stabilization laws, Respondents have engaged in repeated and persistent illegal conduct in violation of [Exec. Law § 63\(12\)](#).

SEVENTH CAUSE OF ACTION

**Violations of Executive Law § 63(12) –
Repeated Violations of NYC Admin. Code § 27-2097
(Failure to Register Multiple Dwelling)**

95. The Attorney General repeats and re-alleges the paragraphs above as if fully stated herein.
96. Petitioner asserts the Seventh Cause of Action against all Respondents.
97. [NYC Admin. Code § 27-2097](#) requires the owner of a multiple dwelling in New York City to file an annual registration with HPD.
98. “A multiple dwelling is a dwelling which is either rented, leased, let or hired out, to be occupied, or is occupied, as the residence or home of three or more families living independently of each other.” See [NYC Admin. Code § 27-2004\(a\)\(7\)](#).
99. The Building is a multiple dwelling as it has three or more residential units.
100. This multiple dwelling registration allows tenants to know who to contact for repairs; HPD to know who to contact in an emergency; and who to hold accountable for dangerous conditions.
101. Respondents’ registrations for the Building expired on September 30, 2024. See **Exhibit 13**.
102. Respondents have been out of compliance for over 18-months.
103. By engaging in repeated and persistent conduct that violated the multiple dwelling laws, Respondents have engaged in repeated and persistent illegal conduct in violation of [Exec. Law § 63\(12\)](#).

PRAYER FOR RELIEF

WHEREFORE, plaintiffs request an order and judgment:

1. Permanently enjoining the Respondents from engaging in the fraudulent, deceptive, and illegal conduct alleged in this Complaint, including violating the rent stabilization laws, tenant harassment laws, and [Exec. Law § 63\(12\)](#);
2. Directing Respondents to take each of the following remedial actions:
 - a. Register all residential dwelling units with DHCR as rent stabilized to reflect the new legal regulated rents for each apartment, and provide tenants receipts of the registration;
 - b. Immediately register the legal regulated rents or submit records to DHCR for calculation of the legal regulated rent for each apartment;
 - c. Provide current tenants with rent stabilized leases and approved riders at the proper legal regulated rent;
 - d. Pay every current rent-stabilized tenant who was overcharged restitution equal to the amount overcharged with 9% interest along with notifying tenants of their right to seek treble damages at DHCR;
 - e. Pay every past rent-stabilized tenant who was overcharged restitution equal to the amount overcharged with 9% interest along with notifying tenants of their right to seek treble damages at DHCR, which includes making diligent efforts to locate prior tenants. If Respondents are unable to find such tenants, directing them to disgorge these ill-gotten gains to Petitioners to be distributed to the Affordable Housing-AG Settlement Fund established HPD for the purpose of remediating the impact of the conduct described herein on the affected communities;

- f. Submit all multiple dwelling registrations required by law to HPD;
 - g. Provide an accounting of how many residential dwelling units are in the Building and amount of rent tenants have paid from July 1, 2020 to present.
3. Directing Respondents to pay:
- a. Civil penalty not to exceed \$2,000 pursuant to [CPLR § 8303\(a\)\(6\)](#) for OAG being forced to bringing a special proceeding under [Exec. Law § 63\(12\)](#);
 - b. Civil penalties of \$500 for each month for each unit that is not registered with DHCR from January 2024 to present pursuant to [RSL § 26-517\(e\)](#);
 - c. Civil penalty of \$2,000 to \$10,000 for each lawful occupant who faced tenant harassment pursuant to [NYC Admin. Code § 27-2115\(m\)\(2\)](#);
 - d. Pay to the New York City Department of Finance for each residential dwelling unit \$20 per unit from 2020 to present pursuant to [RSL § 26-517.1\(a\)](#); and
 - e. Civil penalty for failing to register as a multiple dwelling of not less than \$500 but not more than \$1,500 plus interest, occurring in a multiple dwelling containing five or fewer units, and not less than \$1,000 but not more than \$5,000 plus interest, occurring in a multiple dwelling containing more than five dwelling units pursuant to [NYC Admin. Code § 27-2107](#).
4. Granting such other and further relief as the Court deems just and proper.

New York, NY
June 11, 2026

Respectfully submitted,
LETITIA JAMES
Attorney General of New York

By Justin R. LaMort

JUSTIN R. LA MORT
Assistant Attorney General
BRENT MELTZER
Chief, Housing Protection Unit
OFFICE OF THE NEW YORK STATE
ATTORNEY GENERAL
28 Liberty Street
New York, NY 10005

VERIFICATION

State of New York)
) ss:
County of New York)

Justin R. La Mort, an attorney duly licensed to practice law in the Courts of the State of New York, hereby affirms this 11th day of June, 2026, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

1. I am an Assistant Attorney General in the office of Letitia James, Attorney General of the State of New York, and am duly authorized to make this verification.

2. I have read the foregoing petition and know the contents thereof, which are to my knowledge true, except as to matters stated to be alleged on information and belief, and as to those matters, I believe them to be true. The grounds for my beliefs as to all matters stated upon information and belief are investigatory materials and public records contained in the files of the Housing Protection Unit at the Office of the New York State Attorney General.

3. The reason this verification is not made by the Petitioner is that the Petitioner is a body politic and the Attorney General is its duly authorized representative.

Justin R. La Mort

JUSTIN R. LA MORT