

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF SUFFOLK

THE STATE OF NEW YORK and THE  
CENTRAL PINE BARRENS JOINT  
PLANNING AND POLICY COMMISSION,

Plaintiffs,

-against-

ROBERTS PREMIER DEVELOPMENT LLC  
and DAVID ROBERTS,

Defendants.

**Index No.:**

**SUMMONS (with attached  
verified complaint)**

TO THE ABOVE NAMED DEFENDANTS:

**YOU ARE HEREBY SUMMONED** to answer the attached complaint in this action and to serve a copy of your answer on the plaintiffs' attorneys within twenty (20) days after the service of this summons, exclusive of the day of service (or within thirty (30) days after service is complete if this summons is not personally delivered to you within the State of New York). In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Pursuant to New York CPLR § 503(a), the venue for this action is Suffolk County because Suffolk County is the county in which a substantial part of the events or omissions giving rise to the claim occurred.

DATED: New York, New York  
January 24, 2025

LETITIA JAMES  
Attorney General of the State of New York  
Attorney for Plaintiffs

By: *Abigail Katowitz-Liu*

Abigail Katowitz-Liu  
Assistant Attorney General  
28 Liberty Street – 19th Floor  
New York, New York 10005  
(212) 416-8922

TO DEFENDANTS:

Roberts Premier Development LLC  
3 Sandie Lane  
Manorville, New York 11949

David Roberts  
3 Sandie Lane  
Manorville, New York 11949

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF SUFFOLK

THE STATE OF NEW YORK and THE  
CENTRAL PINE BARRENS JOINT  
PLANNING AND POLICY COMMISSION,

Plaintiffs,

-against-

ROBERTS PREMIER DEVELOPMENT LLC  
and DAVID ROBERTS,

Defendants.

**Index No.:**

**VERIFIED COMPLAINT**

Plaintiffs the State of New York (“the State) and the Central Pine Barrens Joint Planning and Policy Commission (“the Commission”), by their attorney, LETITIA JAMES, Attorney General of the State of New York, allege as follows upon information and belief:

**PRELIMINARY STATEMENT**

1. The Central Pine Barrens, covering approximately 105,000 acres in Suffolk County, New York, is a critically important natural resource that is home to thousands of plant and animal species, some of which are endangered or threatened, and is located over the groundwater aquifer that is the principal source of Long Island’s drinking water. Recognizing the need to protect this ecologically unique and sensitive area, the New York State Legislature enacted the Long Island Pine Barrens Protection Act of 1993 (“the Act”), Environmental Conservation Law

(“ECL”) Article 57. The Act supplemented the Long Island Pine Barrens Maritime Reserve Act.

2. Unless authorized by the Commission, the Act prohibits certain activities in the statutorily defined Core Preservation Area of the Central Pine Barrens and restricts certain other activities in the statutorily defined Compatible Growth Area. The Act established the Commission to manage and regulate activities in the Central Pine Barrens and granted both the Commission and the Attorney General separate authority to enforce the provisions of the Act.

3. Defendants Roberts Premier Development LLC and its principal David Roberts violated the Act and the Commission’s Comprehensive Land Use Plan (the “Plan”) by clearing and grading approximately 13,000 square feet of natural pine barrens vegetation and constructing a 55-foot by 100-foot barn-like structure containing approximately 5,500 square feet for non-residential use on a residentially zoned parcel of real property. The parcel is in the Core Preservation Area (“Core”) with an address of 189 Mill Road, Manorville, Town of Brookhaven, New York (the “Property”).

4. The State and the Commission bring this action to enforce the Act and the Plan promulgated by the Commission under authority of the Act.

5. The State and the Commission seek judgment: (1) enjoining Roberts Premier and Roberts from further violations of the Act and the Plan; (2) enjoining Roberts Premier Development and Roberts to demolish the new barn, including removing the concrete floor, footings, foundations, utility lines, electrical systems,

and roads and parking areas associated with the new barn from the Property; (3) enjoining Roberts Premier and Roberts to develop and implement a restoration plan for the Property subject to the Commission's approval and under the Commission's oversight; and (4) awarding civil penalties as provided by the Act.

### **PARTIES**

6. The Commission is a public body and regional regulatory entity created pursuant to the Act and empowered to implement and enforce the Act and the Plan.

7. The State is a sovereign entity, which, acting by and through the Attorney General, has authority independent from that of the Commission to bring this action to enforce the Act and the Plan.

8. Roberts Premier Development LLC was at all times relevant to this action and continuing to the present day the owner of the Property.

9. David Roberts is the principal of Roberts Premier.

### **VENUE**

10. Venue is proper in Suffolk County pursuant to CPLR §§ 503 and 507 because the property that is the subject of this action is in Suffolk County and the development activities at issue occurred in Suffolk County.

### **STATUTORY AND REGULATORY BACKGROUND**

11. The Central Pine Barrens "is of critical importance" to New York because it is located over "the largest source of pure groundwater in New York," and because it "contains one of the greatest concentrations and diversities of endangered, threatened and special concern species of plants and animals" in New York. ECL §

57-0105. In 1993, the Legislature enacted the Act to protect and preserve these critical natural resources. *Id.* §§ 57-0101 *et seq.*

12. The Legislature defined the boundaries of the Pine Barrens, ECL § 57-0107(10), and within the Pine Barrens, defined two areas – the Core Preservation Area, which “comprise[s] the largest intact areas of undeveloped pine barrens” within the Pine Barrens, ECL § 57-0107(11), and the Compatible Growth Area, which is the area outside of the Core. *Id.* § 57-0107(12).

13. The Act created the five-member Commission to “plan, manage and oversee land use within the Central Pine Barrens,” ECL § 57-0119(1), and authorized the Commission “to prepare, adopt, enforce and ensure implementation of the comprehensive land use plan,” *id.* § 57-0119(6)(a).

14. The Act requires the Plan to protect the ecological integrity of the Central Pine Barrens and to protect the Core by, among other things, “prohibiting or redirecting new construction or development.” *Id.* §§ 57-0121(1), (3)(c).

15. The Act and the Plan prohibit development in the Core absent a hardship exemption from the Commission. *Id.* §§ 57-0121(3)(c) (prohibiting development within the Core), 57-0121(10) (allowing development in the Core “upon a showing of hardship”); Comprehensive Land Use Plan § 5.2.

16. The Act defines development to mean “any building activity,” ECL § 57-0107(13), and provides a non-exhaustive illustrative list of activities and uses that constitute “development,” including, but not limited to:

- (a) “a change in type of use of a structure or land or, if the ordinance or rule divides uses into classes, a change from one class of use designated in an ordinance or rule to a use in another class so designated”;
- (b) “a material increase in the intensity of use of land or environmental impacts as a result thereof”; and
- (c) “commencement of mining, excavation or material alteration of grade or vegetation on a parcel of land excluding environmental restoration activities”.

*Id.* §§ 57-0107(13)(a)-(c).

17. The Act enumerates an exhaustive list of activities and uses that do not constitute “development” for the purposes of the Act. *Id.* §§ 57-0107(13)(i)-(xv). This list includes the “construction of one single family home and customary accessory uses thereto” on parcels in the Core that are identified in the Comprehensive Land Use Plan. *Id.* § 57-0107(13)(x).

18. Projects in the Core that are considered “development” require a hardship waiver permit from the Commission. Those permits are issued upon a project applicant’s demonstration of either an extraordinary hardship or a compelling public need. *Id.* §§ 57-0121(10), 57-0123(3)(a).

19. The Act authorizes the Commission and/or the Attorney General to commence an action seeking to enjoin, abate, or correct any violation of the Act or the Plan, as well as seeking restitution for such violation. ECL § 57-0136(4). Each violation of the Act or the Plan that occurs within the Core is punishable by a civil penalty of up to \$25,000 plus an additional penalty of up to \$1,000 per day for each day each violation continues. *Id.* § 57-0136(2)(a).

20. The Act requires the Commission to consult with the Town of

Brookhaven before initiating an enforcement action, ECL § 57-0136(1)(c).

### FACTS

21. In July 2022, Roberts Premier acquired the Property, which is in the Core.

22. The Property is approximately 4.392 acres in size and is in the Town of Brookhaven's A Residence 5 Zoning District. Non-residential uses are not permitted on parcels in this district. The Property is identified on the Suffolk County Tax Map as # 200-355-2-6.

23. When Roberts Premier acquired the Property, it was improved with a single-family home, a patio, an 827 square foot barn, and a 323 square foot garage.

24. By application to the Town of Brookhaven dated August 24, 2022, Roberts Premier sought a permit from the Town to construct a new 5,500 square foot barn on the Property. At the time of the application, the Commission had not received an application for a hardship exemption to allow for either the construction of the barn or any clearing and grading of the land associated with the barn's construction.

25. To the date of this Complaint, the Commission has still received no application for a hardship exemption to allow development activity on the Property.

26. Roberts Premier removed vegetation and graded an area of the Property at some point in time between June 29, 2022, and October 7, 2022.

27. Roberts Premier constructed a new barn in the cleared area at some point in time between October 7, 2022, and March 19, 2023.



28. The Town issued a building permit dated November 28, 2022, authorizing Roberts Premier to construct a 5,500 square-foot barn on the Property.

29. On or about March 24, 2023, the Town notified the Commission that approximately 13,000 square-feet of natural pine barrens vegetation had been cleared, the cleared area of the Property had been graded, and that the new barn had been constructed on the Property.

30. As of March 2023, storage containers of a type that were not permitted in a residential zoning district were on the side of the new barn along with parking areas where multiple pick-up trucks and vans were parked, and several paved roadways, as shown in this aerial photograph:



31. As of June 7, 2023, “Green Leaf Cabinet Corp.,” a custom cabinetry and millwork business, maintained a website that provided a business address that was the same as the Property’s address and a map directing people to the Property.

32. The “Green Leaf Cabinet Corp.” company profile page in Dun &

Bradstreet, a data and analytics corporation that maintains a commercial enterprises database, identified its industry as household and institutional furniture and kitchen cabinet manufacturing with a business address that was the same as the Property's address.

33. On April 19, 2023, the Commission issued a Notice of Violation to Roberts Premier and Roberts stating that they engaged in prohibited conduct by building the new barn for non-residential use and clearing and grading land in the Core without authorization from the Commission.

34. On June 29, 2023, Roberts provided Commission staff access to the Property for a site inspection. He also allowed staff to take photographs during the inspection.

35. The Commission's inspection revealed that the new barn is a wood frame building with a concrete floor. At the time of the inspection, the inside of the barn contained industrial grade manufacturing woodworking equipment and machinery used in the commercial manufacturing of cabinets, tables, millwork, and other products.

36. The inside of the new barn also contained industrial grade exhaust and sawdust collection equipment including bags, vacuums, and barrels appeared to be designed to collect and remove sawdust created as a byproduct of the woodworking process.

37. At the time of the inspection, Commission staff also observed a forklift, lumber, commercial carpentry equipment, barrels to collect saw dust, industrial

grade lighting, and industrial grade heating, ventilation, and air conditioning equipment inside the new barn.

38. On the western side of the new barn, staff observed a 400-amp electrical service box and emergency exit stairs. A typical residence requires only a 100-to-200-amp electrical service panel.

39. On the eastern side of the new barn, staff observed a partially fenced storage area.

40. Staff observed that the northern and southern sides of the new barn have wide garage doors that are large enough to allow vehicles to be driven into the barn. Crushed concrete driveways surround the barn, and the driveway to the south of the barn is paved with blacktop.

41. Staff observed that a parking area in the northeast corner of the Property, which contained a storage trailer.

42. Staff observed immediately adjacent to the parking area is a smaller barn that, on the date of the inspection, was used for storing large-scale commercial vacuuming equipment, machinery, and materials.

43. The equipment and facilities present on the Property coupled with the Green Leaf Cabinet Corp.'s website that provided a business address that was the same as the Property's address and a map directing people to the Property and the Green Leaf Cabinet Corp.'s company profile page in Dun & Bradstreet demonstrate that Roberts Premier and Roberts were conducting a commercial cabinetry business on the Property.

44. Roberts Premier and Roberts' business changed the use of the Property by instituting a commercial use in a residentially zoned district.

45. Roberts Premier and Roberts' business caused a material increase in the intensity of use and environmental impacts on the Property. This impact was above and beyond the impact caused by the removal of vegetation, grading of the property, and construction of the barn.

46. The barn's unusual size, the commercial-grade power supply, and the associated parking structures all demonstrate that the barn is not a structure that has been built for "customary and accessory" residential use.

47. After the inspection, the Commission engaged in negotiations with Roberts Premier and Roberts to resolve their violations of the Act and the Plan, which were unsuccessful.

48. On February 29, 2024, Roberts Premier commenced a proceeding against the Commission seeking, *inter alia*, a declaratory judgment that the barn should be deemed to be a "residential" structure and therefore its construction and subsequent use should be regarded as "nondevelopment" requiring no authorization from the Commission. *See Roberts Premier Dev. v. Central Pine Barrens Joint Policy and Planning Commn.*, Index No. 605285/2024 (Sup. Ct., Suffolk Cnty).

49. In that Petition, Roberts Premier confirmed that it was responsible for the construction of the new barn and the related clearing of protected pine barrens vegetation and grading. Petition, ¶¶ 5, 13.

50. By Decision and Order dated December 6, 2024, Justice Joseph C.

Pastoressa granted the Commission's motion to dismiss and dismissed the petition. A copy of the Decision and Order is attached as Exhibit A.

51. On April 19, 2023, a representative of the Commission informed the Town of Brookhaven that the Commission intended to initiate this action.

### **FIRST CAUSE OF ACTION**

#### **Violation of the Act and Comprehensive Land Use Plan by Clearing Pine Barrens Vegetation and Grading the Property**

52. The Commission and the State repeat the allegations above as if fully set forth here.

53. The Act and the Plan prohibit development in the Core without a hardship waiver permit. ECL §§ 57-0121(3)(c) (prohibiting development within the Core), 57-0121(10) (allowing development in the Core only "upon a showing of hardship"); Comprehensive Land Use Plan § 5.2. "Development" includes "material alteration of grade or vegetation." ECL § 57-0107(13)(c).

54. Roberts Premier and Roberts cleared approximately 13,000 square feet of natural pine barrens vegetation on the Property and graded the cleared area of the Property without the grant of a hardship waiver permit by the Commission.

55. Roberts Premier and Roberts violated the Act and the Comprehensive Land Use Plan by clearing vegetation on and grading approximately 13,000 square feet without the grant of a hardship waiver permit by the Commission.

56. Pursuant to ECL § 57-0136(2)(a), the Commission and the State are entitled to a civil penalty from Roberts Premier and Roberts of up to \$25,000 for the violation and an additional \$1,000 for each day the violation continues.

57. Pursuant to ECL § 57-0136(4), the Commission and the State are entitled to an injunction compelling Roberts Premier and Roberts to remove the new barn and the concrete floor, footings, foundations, utility lines, electrical systems, and roads and parking areas associated with the new barn and restore the Property to the condition prior to the violation by implementing a restoration plan prepared by the Commission and doing so subject to the Commission's oversight and approval.

### **SECOND CAUSE OF ACTION**

#### **Violation of the Act and Comprehensive Land Use Plan by Constructing a 5,500 Square Foot Barn**

58. The Commission and the State repeat the allegations above as if fully set forth here.

59. The Act and the Comprehensive Use Plan prohibit development in the Core without a hardship waiver permit. ECL §§ 57-0121(3)(c) (prohibiting development within the Core), 57-0121(10) (allowing development in the Core only "upon a showing of hardship"); Comprehensive Land Use Plan § 5.2. "Development" includes "any building activity." ECL § 57-0107(13).

60. The construction of a single-family home and customary and accessory uses on parcels located in the Core identified on the Comprehensive Land Use Plan is not "development," and therefore does not require a hardship waiver permit. ECL § 57-0107(13)(x).

61. Roberts Premier and Roberts constructed a new 5,500 square foot barn without the grant of a hardship waiver permit by the Commission.

62. The barn is not appropriate for any customary accessory residential use



and has not been used for residential purposes.

63. Roberts Premier and Roberts violated the Act and the Plan by building the barn without the grant of a hardship waiver permit by the Commission.

64. Pursuant to ECL § 57-0136(2)(a), the Commission and the State are entitled to a civil penalty from Roberts Premier and Roberts of up to \$25,000 for the violation and an additional \$1,000 for each day the violation continues.

65. Pursuant to ECL § 57-0136(4), the Commission and the State are entitled to an injunction compelling Roberts Premier and Roberts to fully remediate the violation and restore the Property to the condition prior to the violation by implementing a restoration plan prepared by the Commission and doing so subject to the Commission's oversight and approval.

### **THIRD CAUSE OF ACTION**

#### **Violation of the Act and the Plan by Operating a Commercial Enterprise on a Residentially Zoned Parcel**

66. The Commission and the State repeat the allegations above as if fully set forth here.

67. The Act and the Plan prohibit development in the Core without a hardship waiver permit. ECL §§ 57-0121(3)(c) (prohibiting development within the Core), 57-0121(10) (allowing development in the Core only "upon a showing of hardship"); Comprehensive Land Use Plan § 5.2. "Development" includes a change from one class of use to another class of use and a "material increase in the intensity of use of land or environmental impacts thereof." ECL §§ 57-0107(13)(a), (b).

68. Roberts Premier and Roberts have operated a custom carpentry and

cabinet manufacturing business in the new barn on the Property and the machinery located inside the barn has been used to support the commercial enterprise.

69. Roberts Premier and Roberts' business changed the use of the Property by instituting a commercial use in a residentially zoned district.

70. Roberts Premier and Roberts' business caused a material increase in the intensity of use and environmental impacts on the Property.

71. Roberts Premier and Roberts violated the Act and the Plan by instituting a commercial enterprise in a residentially zoned district and causing an increase in the intensity of land use without the grant of a hardship waiver permit by the Commission.

72. Pursuant to ECL § 57-0136(2)(a), the Commission and the State are entitled to a civil penalty from Roberts Premier and Roberts of up to \$25,000 for the violation and an additional \$1,000 for each day the violation continues.

73. Pursuant to ECL § 57-0136(4), the Commission and the State are entitled to an injunction enjoining Roberts Premier and Roberts to cease operating their commercial enterprise and restore the Property to the condition prior to the violation by implementing a restoration plan prepared by the Commission and doing so subject to the Commission's oversight and approval.

**WHEREFORE**, plaintiffs respectfully request that the Court enter judgment:

1. Permanently enjoining Roberts Premier and Roberts from clearing vegetation and grading the soil, constructing any structures other than for the purpose of a customary accessory residential use, operating a commercial enterprise



in a residentially zoned area, or engaging in any other activities on the Property that violate the Act and the Plan, and

2. Permanently enjoining Roberts Premier and Roberts to fully remediate all of the environmental injuries and restore the Property to its pre-violation condition by implementing a restoration plan for the Property prepared by the Commission and doing so under its oversight and approval, and

3. Assessing a civil penalty against Roberts Premier and Roberts of up to \$25,000 for each violation of the Act and the Comprehensive Land Use Plan, and assessing an additional penalty against Roberts Premier and Roberts of up to \$1,000 per day for each day each such violations continues pursuant to ECL § 57-0136(2)(a), and

4. Providing such other and further relief as the Court shall deem to be just and proper.

Dated: New York, New York  
January 24, 2025

LETITIA JAMES  
Attorney General of the State of New York  
Attorney for Plaintiffs

By: Abigail Katowitz-Liu  
Abigail Katowitz-Liu  
Assistant Attorney General  
28 Liberty Street – 19th Floor  
New York, New York 10005  
(212) 416-8922

VERIFICATION

STATE OF NEW YORK    )  
                                      : ss.:  
COUNTY OF SUFFOLK  )

JUDITH JAKOBSEN, being duly sworn, deposes and says:

I am Executive Director of the Central Pine Barrens Joint Planning & Policy Commission (the Commission). I have read the Complaint and assert, based upon personal knowledge and information and belief, that the contents thereof are true. The sources of my personal knowledge, information and belief are the records and documents contained in the files of the Commission and discussions with and information provided by Commission staff and others with knowledge and information regarding this matter.

*Judith Jakobsen*  
\_\_\_\_\_ **JUDITH JAKOBSEN**

Sworn to before me this day  
24<sup>th</sup> day of January, 2025.

*Angela L. Brown*  
\_\_\_\_\_

Notary Public

ANGELA L BROWN  
Notary Public - State of New York  
NO. 01BR6424331  
Qualified in Suffolk County  
My Commission Expires Nov 1, 2025

# EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
IAS/TRIAL PART 34 - SUFFOLK COUNTY

PRESENT: HON. JOSEPH C. PASTORESSA

-----X

In the Matter of the Petition of

ROBERT'S PREMIER DEVELOPMENT
LLC,

Petitioner,

For an order pursuant to article 78 of the
Civil Practice Law and Rules, and for a
declaratory judgment

- against -

CENTRAL PINE BARRENS JOINT
POLICY AND PLANNING COMMIS-
SION,

Respondent.
-----X

DECISION AND ORDER

Index No.: 605285/2024

Mot. Seq. 001: MD

Mot. Seq. 002: MG; CASEDISP

Scheyer & Stern, LLC, Nesconset, NY,
for petitioner

Letitia James, Esq., New York State
Attorney General, New York, NY, for
respondent

This hybrid CPLR article 78 proceeding and declaratory judgment action stems from a determination of respondent, Central Pine Barrens Joint Policy and Planning Commission, regarding certain activity taken by petitioner, Robert's Premier Development LLC. Specifically, petitioner built a 5,500 square foot pole barn on property it owns in Manorville, New York. Petitioner obtained a building permit from nonparty Town of Brookhaven to construct the pole barn. In April 2023, respondent issued a notice of violation (NOV) to petitioner, claiming that erection of the pole barn violated Environmental Conservation Law (ECL) article 57.

In February 2024, petitioner's counsel sent a letter to respondent demanding a letter of non-development, claiming that "the pole barn is currently being used for residential purposes only, making it non-development as that term is defined in [the] Long Island Pine Barrens Act of 1993." Respondent failed to issue one. Petitioner then com-



*Matter of Robert's Premier Dev. LLC v Central Pine Barrens Joint Policy & Planning Commn.*

Index No. 605285/2024

Page 2

menced this proceeding for (1) mandamus to compel respondent to issue a Letter of Non-Development and (2) a judgment declaring that the use of the pole barn is residential and, therefore, considered non-development under ECL article 57. Respondent moves to dismiss the petition under CPLR 3211 (a) (5) and (7).

A petitioner is only entitled to a writ of mandamus “to compel the performance of a purely ministerial act [that] does not involve the exercise of official discretion or judgment, and only when a clear legal right to the relief has been demonstrated” (*Matter of Harper v Neary*, 225 AD3d 595, 596 [quotation marks and citations omitted], *appeal dismissed* 41 NY3d 1007; *see Matter of Dickson v New York City Dept. of Bldgs.*, 226 AD3d 1014; *Matter of Woodside Manor Nursing Home, Inc. v Zucker*, 223 AD3d 94, *appeal dismissed* 41 NY3d 991, *lv denied* \_\_ NY3d \_\_, 2024 NY Slip Op 77114). Even if a petitioner has established that it has a clear legal right to the performance of a purely ministerial act, a court cannot “direct how [the respondent] shall perform that duty” (*Alliance to End Chickens as Kaporos v New York City Police Dept.*, 32 NY3d 1091, 1093 [quotation marks and citations omitted], *cert denied* 139 S Ct 2651, *rehearing denied* 140 S Ct 18).

Here, petitioner has not shown that it has a clear legal right to a letter of non-development. Indeed, it does not point to any statutory or regulatory requirement for respondent to issue such a letter. Moreover, petitioner has not conclusively demonstrated that the pole barn constitutes a non-residential use.

Inasmuch as petitioner challenges the NOV, such challenge is time-barred (CPLR 217; ECL § 57-0135). So much of the petition as seeks a judgment declaring that the pole barn is a non-residential use seeks relief that could have been obtained by challenging the NOV in a CPLR article 78 proceeding and, therefore, is similarly time-barred (*e.g. Matter of Save the Pine Bush v City of Albany*, 70 NY2d 193; *Merrill v Friends Academy*, 298 AD2d 439). Thus, respondent’s motion is granted, and the petition is dismissed.

Matter of Robert's Premier Dev. LLC v Central Pine Barrens Joint Policy & Planning Commn.  
Index No. 605285/2024  
Page 3

This shall constitute the decision and order of the Court.

Dated: December 6, 2024

  
\_\_\_\_\_  
Hon. Joseph C. Pastorella, J.S.C.

Papers considered: NYSCEF documents 1 through 17