



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

April 2, 2025 11:42 am

USEPA – Region II
Regional Hearing Clerk

Helen Ferrara
Regional Judicial Officer
U.S. Environmental Protection Agency
290 Broadway, 17th floor
New York, New York 10007-1866
By Email at ferrara.helen@epa.gov

Re: Motion for Default in A&I Developers, Inc., Docket No. TSCA-02-2018-9289

Honorable Helen Ferrara:

As it has recently come to the undersigned's attention that some documents associated with proof of mailing and delivery of the Complainant's Motion for Default had not been uploaded to the official record for this matter in the E-Docket, this notice is sent to confirm that Complainant's Motion for Default in the above-referenced proceeding has been properly served on the Respondent and the documents successfully uploaded as of March 27, 2025. Document associated with the service of process are also provided as attachments to this notice for your convenience.

On June 26, 2024, EPA, Region 2 filed and served a Motion for Default in this civil administrative matter against Respondent, A&I Developers, Inc. Copies of the Motion for Order of Default, along with the Memorandum in Support, Declarations and Proposed Default Order were sent by both Certified Mail/Return Receipt Requested and Regular Mail to each of the following: Ashad Ajim, A&I Developers, Inc., 265 Sunrise Highway Ste 1-304, Rockville Centre, NY 11570 ("Rockville address") and to Ashad Ajim, Owner, A&I Developers, Inc., at 159-20 115th Road, Jamaica, NY 11434 ("Jamaica address"). The Rockville address, a UPS storefront with mailbox services, is the address listed with the New York Department of State Division of Corporations for service of process on A&I Developers, Inc, and the Jamaica address is owned by Ashad Ajim and is the business address. See Attachment 4 and Exhibit 13, Memo of Law in support of Complainant's Motion for Default. Additionally, PDF versions of Complainant's Motion for Default, along with the supporting documents, were electronically sent to ajimprobuilders@yahoo.com, the email address included in A&I Developer's response to EPA's information request letter. See Exhibit 12, Memo of Law in support of Complainant's Motion for Default. There was no error report returned from the email address.

For the certified mail package sent to Respondent's Rockville address, the certified mail receipt ("green card") for this mailing was returned to EPA signed (with an illegible signature) and postmarked June 28, 2024. (Attachment 1) Both the certified mail and first-class mail packages were later returned to EPA in September 2024. Notwithstanding the later return of these packages, proper service pursuant to the Consolidated Rules of Practice, 40 C.F.R. Part 22, of the Motion for Default to this address was effected when the green card was signed. See e.g., *In the Matter of Herman Roberts*, 2000 EPA RJO Lexis 211, 214 (RJO April 14, 2000), "service of the

Complaint [was] achieved in accordance with 40 CFR § 22.5(b)(1)(i)" where the recipient was not the addressee but rather "someone associated with Respondent's business [who] had to go to the post office and sign for the envelope containing the complaint ... "; *see also, In the Matter of C.W. Smith*, Docket No. CWA-04-2001-1501, 2002 ALJ Lexis 7 (ALJ Order on Motions, February 6, 2002), citing *Herman Roberts* for the proposition that a person who signs a certified mail green card and picks up mail at a respondent's post office box is authorized to receive service of process under the Consolidated Rules of Practice.

For the certified mail package sent to Respondent's Jamaica address, EPA received back a return receipt green card, but the green card was not signed. (Attachment 2) A United States Postal Service (USPS) notice indicates delivery of the certified mail package was made to the Jamaica address on June 28, 2024. (Attachment 3) The certified package sent to this address was not returned to EPA. In addition, the package sent by regular first-class mail was not returned to EPA. A presumption of delivery to the addressee is established with the proper address and mailing of documents. *See In the Matter of Tifa Limited*, 1999 EPA ALJ Lexis 55 (July 7, 1999), *aff'd* 2000 EPA App Lexis 17 (EAB, June 5, 2000). The Certificate of Service attests to the mailing of the package by first class mail. *See* Complainant's Motion for Default.

As noted above, copies of the aforementioned attachments had been previously provided to the Regional Hearing Clerk but were only recently confirmed as having been uploaded to the record for this matter. For these reasons, Complainant's counsel respectfully contends that proper service of the Motion for Default has occurred and submits this confirmation that the record showing proper service is complete.

Respectfully,

Karen L. Taylor, Esq.
Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency,
Region 2
290 Broadway, 16th floor
New York, New York 10007-1866

Attachments

cc: by both Certified Mail/Return Receipt Requested and Regular Mail to:

Mr. Ashad Ajim
A&I Developers, Inc.
159-20 115th Road
Jamaica, NY 11434

Mr. Ashad Ajim
A&I Developers, Inc.
265 Sunrise Highway Ste 1-304
Rockville Centre, NY 11570

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing letter confirming service, bearing docket number TSCA-02-2018-9289, was sent this day in the following manner to the addresses listed below:

Copy by Email to the Regional Hearing Clerk

Karen Maples
U.S. Environmental Protection Agency, Region 2
290 Broadway, 17th Floor
New York, NY 10007-1866
maples.karen@epa.gov

Copy by both Certified Mail/Return Receipt Requested and Regular Mail to:

Mr. Ashad Ajim
A&I Developers, Inc.
159-20 115th Road
Jamaica, NY 11434

Mr. Ashad Ajim
A&I Developers, Inc.
265 Sunrise Highway Ste 1-304
Rockville Centre, NY 11570

Signed and Dated:

Office of Regional Counsel
Waste & Toxic Substances Branch

Attachment 1

Rockville Address Green Card

USPS TRACKING#



9590 9402 5531 9249 4796 20



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

KHARAJ TAYLOR
290 BROADWAY - 16th FL
New York, NY 10007



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR. ASHRAF AJIM
H+I DEVELOPERS INC.
265 SUNRISE HIGHWAY STE
ROCKVILLE (PAVE), NY 11570 1-304



9590 9402 5531 9249 4796 20

2. Article Number (Transfer from sender's label)
7018 1830 0000 9639 9383

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)

☐ Priority Mail Express®

☐ Registered Mail™

☐ Registered Mail Restricted Delivery

☒ Return Receipt for Merchandise

☐ Signature Confirmation™

☐ Signature Confirmation Restricted Delivery

Attachment 2

Jamaica Address Green Card

USPS TRACKING#



NEW YORK, NY 100
 JUL 24 PM 13 L
 JUL 2004 PM 5 L

First-Class Mail
 Postage & Fees Paid
 USPS
 Permit No. G-10

9590 9402 5531 9249 4796 37

United States
 Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

KAVEN TAYLOR
 290 BROADWAY - 11th FL
 NEW YORK, NY 10007



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Ashad Ajim
 A+I Developers INC.
 159-20 115th ROAD
 JAMAICA, NY 11434



9590 9402 5531 9249 4796 37

2. Article Number (Transfer from service label)

7018 1830 0000 9639 9390

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☒ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

Attachment 3

US Postal Service Tracking for Jamaica
Address

Tracking Number:

Remove X

70181830000096399390

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your item was delivered to an individual at the address at 10:40 am on June 28, 2024 in JAMAICA, NY 11434.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Left with Individual

JAMAICA, NY 11434

June 28, 2024, 10:40 am

Arrived at USPS Regional Facility

BROOKLYN NY DISTRIBUTION CENTER

June 27, 2024, 11:32 am

Arrived at USPS Regional Facility

NEW YORK NY DISTRIBUTION CENTER

June 26, 2024, 9:34 pm

USPS in possession of item

NEW YORK, NY 10278

June 26, 2024, 12:27 pm

Hide Tracking History

Feedback

[What Do USPS Tracking Statuses Mean? \(https://faq.usps.com/s/article/Where-is-my-package\)](https://faq.usps.com/s/article/Where-is-my-package)

Text & Email Updates

USPS Tracking Plus®

Product Information**See Less**

Track Another Package

Need More Help?

Contact USPS Tracking support for further assistance.

[FAQs](#)

Attachment 4

Jamaica address



NOT LISTED FOR SALE



15920 115th Rd

Jamaica, NY 11434

South Jamaica Neighborhood

Estimated Value: **\$743,442 - \$912,000**

Estimated Value

\$743,442 - \$912,000


See Similar Homes for Sale

-- Bed -- Bath **1,700** Sq Ft **\$473/Sq Ft** Est. Value

About This Home

This home is located at 15920 115th Rd, Jamaica, NY 11434 and is currently estimated at \$803,861, approximately \$472 per square foot. 15920 115th Rd is a home located in Queens County with nearby schools including P.S. 140 -

Ownership History

Date	Name	Owned For	Owner Type
Apr 2003 - Present	Ajim Ashad	21 Years and 11 Months	Private Individual 

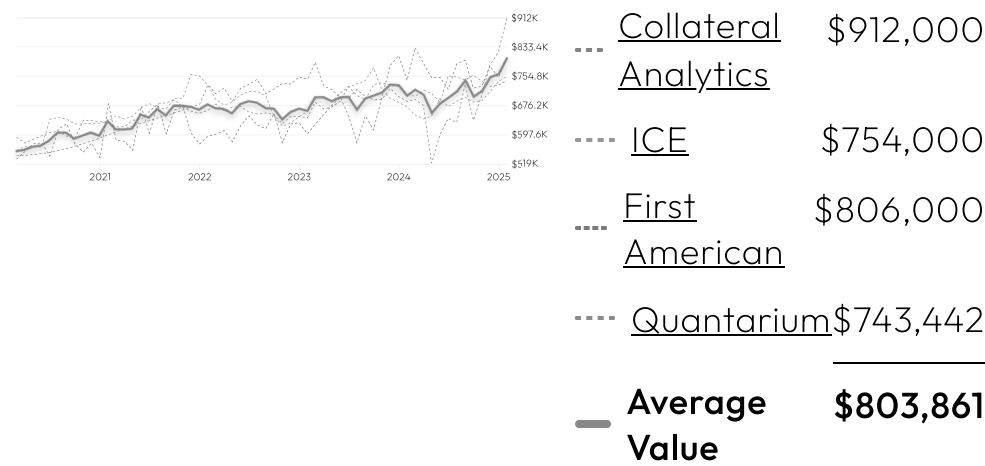
Estimated Property Value

Range of Values:

\$743,442 - \$912,000

Based on January 2025 values

- 1 Year
- 5 Year
- 10 Year

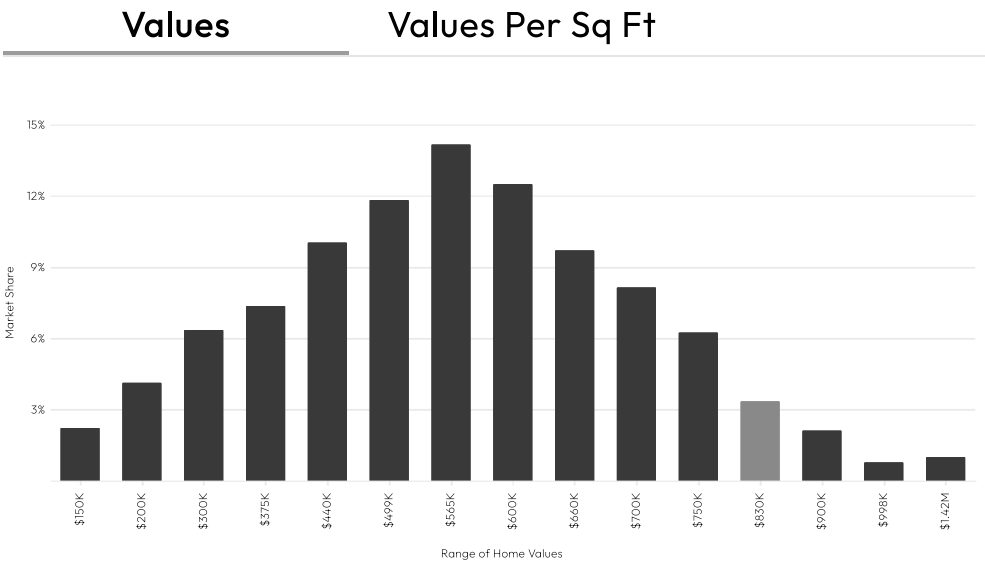


Create a Home Valuation Report for This Property

The Home Valuation Report is an in-depth analysis detailing your home's value as well as a comparison with similar homes in the area

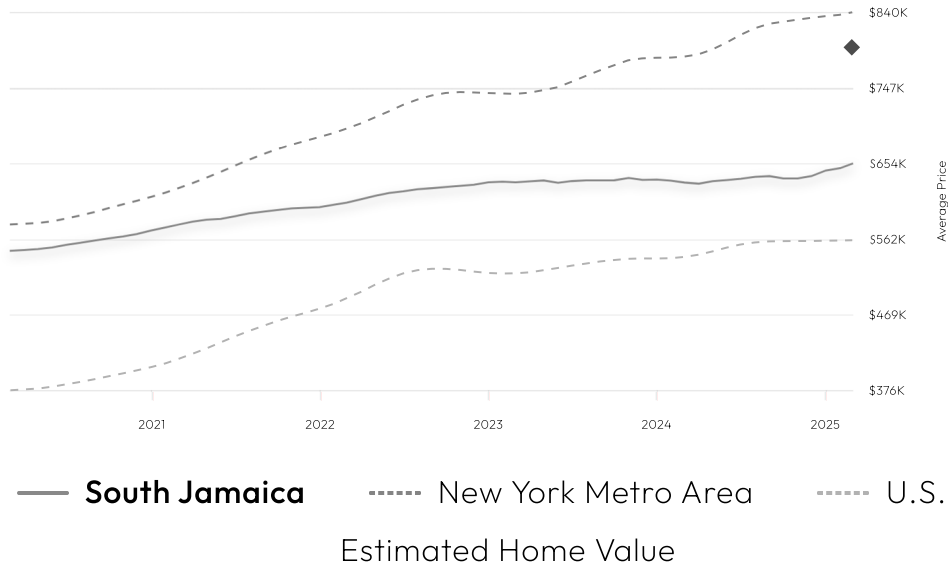
[Create the Home Valuation Report for This Property](#)

Home Values in the Area



Source: Public Records

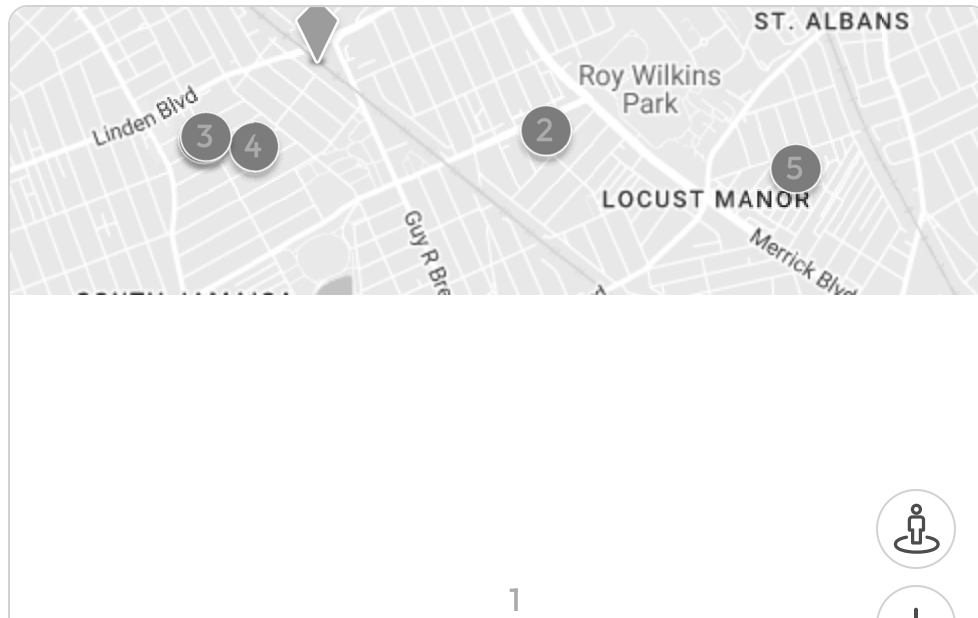
Average Home Value in this Area



Source: Public Records

Similar Sold Homes

Recent ▼





1 SOLD MAR 26, 2025

House 3 Beds...
166-04 S Condui...
56 Days On...



2 SOLD MAR 26, 2025

Multifamily
167-52 118th...
43 Days On...



3 SOLD MAR 22, 2025

House 3 Beds...
150-38 115th Rd...
158 Days On...

◀ 1 2 Similar Sold Homes in Jamaica

Purchase History

Date	Buyer	Sale Price	Title Company
<u>Apr '03</u>	Ajim Ashad	\$265,000	--

Source: Public Records

Mortgage History

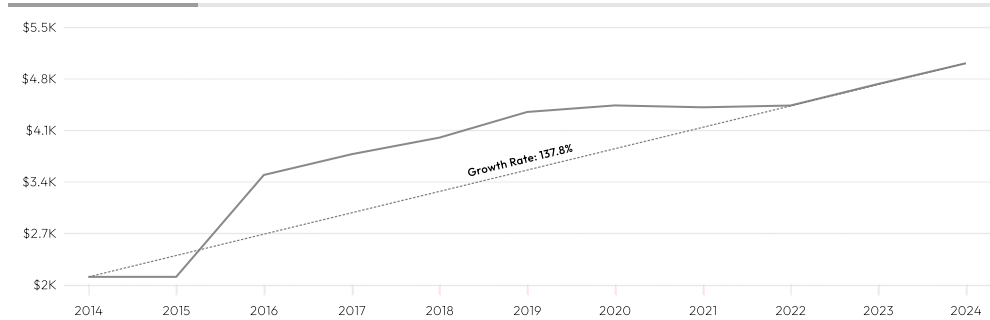
Date	Status	Borrower	Loan Amount
<u>Feb '18</u>	Open	Ajim Ashad	\$232,815

Date	Status	Borrower	Loan Amount
Apr '03	Previous Owner	Ajim Ashad	\$212,000

Source: Public Records

Tax History Compared to Growth

Tax History
 Assessment History



Source: Public Records

Tax History

Year	Tax Paid	Tax Assessment	Land	Improvement
2024	\$5,008	\$24,936	\$6,850	\$18,086
2023	\$4,728	\$23,538	\$6,989	\$16,549
2022	\$4,434	\$45,120	\$14,520	\$30,600

New York City Department of Finance
Office of the City Register

HELP


[Click help for additional instructions]
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Current Search Criteria:

Borough: QUEENS
Block: 12199
Lot: 0009 **Unit:** N/A
Date Range: To Current Date
Document Class: All Document Classes

Search Results By Parcel Identifier

Records 1 - 10 << previous [next](#) >> Max Rows [10](#) [\[Search Options \]](#) [\[New BBL Search \]](#) [\[Edit Current Search \]](#) [\[View Tax Map \]](#) [\[Print Index \]](#)

View	Reel/Pg/File	CRFN	Lot	Partial	Doc Date	 Recorded / Filed	Document Type	Pages	Party1	Party2	Party 3/ Other	More Party 1/2 Names	Corrected/ Remarks	Doc Amount
DET	IMG	2018000080554	9	ENTIRE LOT	2/15/2018	3/8/2018 11:27:47 AM	AGREEMENT	31	AJIM, ASHAD	JP MORGAN CHASE BANK, N.A.				380,000
DET	IMG	2018000080553	9	ENTIRE LOT	2/15/2018	3/8/2018 11:27:46 AM	MORTGAGE	17	AJIM, ASHAD	JP MORGAN CHASE BANK, N.A.				232,815
DET	IMG	2018000080552	9	ENTIRE LOT	1/19/2018	3/8/2018 11:27:45 AM	ASSIGNMENT, MORTGAGE	4	BLAIR SERVICES OF AMERICA, INC	JP MORGAN CHASE BANK, N.A.		✓		0
DET	IMG	2003000525366	9	ENTIRE LOT	8/22/2003	12/23/2003 11:06:06 AM	SATISFACTION OF MORTGAGE	4	BRADY A/K/A, JANET	FORD CONSUMER FINANCE COMPANY, INC.		✓		0
DET	IMG	2003000365791	9	ENTIRE LOT	6/14/2003	9/17/2003 2:16:20 PM	SATISFACTION OF MORTGAGE	3	BRADY, ROBERT E	WELLS FARGO HOME MORTGAGE, INC.		✓		0
DET	IMG	2003000324591	9	ENTIRE LOT	4/29/2003	9/3/2003 12:54:18 PM	MORTGAGE	19	AJIM, ASHAD	MERS				212,000
DET	IMG	2003000324590	9	ENTIRE LOT	4/29/2003	9/3/2003 12:54:18 PM	DEED	7	BRADY, ROBERT E	AJIM, ASHAD		✓		265,000
DET	IMG	2003000160985	9	ENTIRE LOT	12/11/2002	6/9/2003 1:23:34 PM	MORTGAGE	28	BRADY, ROBERT E	WELLS FARGO HOME MORTGAGE, INC.		✓		0
DET	IMG	4968/1594	9	ENTIRE LOT		9/10/1998	AGREEMENT	6	ASSOCIATES HOME EQUITY SERVICE, INC	BRADY, JANET M		✓		0
DET	IMG	4909/1120	9	ENTIRE LOT		7/7/1998	SATISFACTION OF MORTGAGE	2	BRADY, ROBERT ETAL	USHRY, WILLIAMS				0

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