

Jersey Department of Environmental Protection (the "Commissioner") and the Administrator of the New Jersey Spill Compensation Fund (the "Administrator") (collectively, "Plaintiffs"), having their principal offices at 401 East State Street in the City of Trenton, State of New Jersey, by way of Complaint against defendants Elizabeth Bolt & Nut Manufacturing Corporation, the Stemple Corporation, the Estate of Rose Haskell; Aquaserv Bottled Water Service Inc.; "XYZ Corporations" 1-10 (Names Fictitious); and "John and/or Jane Does" 1-10 (Names Fictitious) (collectively "Defendants") allege as follows:

STATEMENT OF THE CASE

1. This is a civil action concerning 43-49 South Spring Street, Elizabeth, Union County, New Jersey ("Site" or "Property"). The Property is contaminated with excessive levels of petroleum hydrocarbons, lead and other hazardous substances as a result of past industrial operations on the property.
2. Historically, low-income communities and communities of color across the country have been exposed to disproportionately high and unacceptably dangerous levels of air, water, and soil pollution, with the accompanying potential for increased public health impacts. But residents of all communities deserve fair and equitable treatment in matters affecting their environment, community, homes, and health. See, e.g,

Exec. Order No. 23 (April 20, 2018), 50 N.J.R. 1241(b) (May 21, 2018).

3. Plaintiffs bring this action against defendants Elizabeth Bolt & Nut Manufacturing Corporation, the Stemple Corporation, the Estate of Rose Haskell (collectively, the "Haskell Defendants"), and Aquaserv Bottled Water Service Inc. ("Aquaserv"), pursuant to the New Jersey Spill Compensation and Control Act (the "Spill Act"), N.J.S.A. 58:10-23.11 to -23.24; the Industrial Site Recovery Act ("ISRA"), N.J.S.A. 13:1K-6 to -14; and the Brownfield and Contaminated Site Remediation Act ("Brownfield Act"), N.J.S.A. 58:10B-1 to -31.
4. The Site is located across the street from a large residential area. This action aims to protect those residents from exposure to the known hazardous substances on the Site and wherever contamination has migrated ("Contaminated Site").
5. To protect human health and the environment, Plaintiffs seek:
 - (1) to compel Defendants to remediate the Contaminated Site;
 - (2) to recover from Defendants any costs Plaintiffs have incurred or will incur to remediate the Contaminated Site;
 - (3) to impose statutory penalties on the Haskell Defendants;
 - and (4) for other related relief.

THE PARTIES

6. DEP is a principal department in the State of New Jersey's executive branch of government. The Department maintains its principal offices at 401 East State Street, Trenton, New Jersey. Pursuant to the authority vested in the DEP by N.J.S.A. 13:1D-9 and the aforementioned statutes that the Legislature enacted to protect human health and the environment, the Department is empowered to compel parties liable for hazardous substances to remediate the contamination, recover costs incurred to remediate hazardous waste discharges using public funds, and to recover civil penalties in Superior Court.
7. The Commissioner is the Commissioner of DEP. N.J.S.A. 58:10-23.11b and N.J.S.A. 58:10A-3. In this capacity, the Commissioner is vested by law with various powers and authority, including those conferred by DEP's enabling legislation, N.J.S.A. 13:1D-1 to -19. The Department maintains its principal offices at 401 East State Street, Trenton, New Jersey. The Commissioner is authorized by law to commence a civil action in Superior Court for appropriate relief for any violation of ISRA. N.J.S.A. 13:1K-13.1.
8. The Administrator is the chief executive officer of the New Jersey Spill Compensation Fund ("Spill Fund"), with a principal place of business at 401 East State Street, Trenton,

New Jersey. N.J.S.A. 58:10-23.11j. As the chief executive officer of the Spill Fund, the Administrator is authorized to approve and pay any cleanup and removal costs the Department incurs and to certify the amount of any claim to be paid from the Spill Fund. N.J.S.A. 58:10-23.11j.c and -d.

9. Defendant Elizabeth Bolt & Nut Manufacturing Corporation ("EBN") was incorporated in the State of New Jersey in 1947 and operated on the Site from at least 1969 to 1993, manufacturing metal bolts, nuts, screws, rivets, washers, wire goods, and/or special industrial fasteners. EBN's corporate status was revoked in 1996 for failure to pay annual reporting fees.
10. According to available historic corporate filings, EBN's former principal place of business was 43 South Spring Street, Elizabeth, New Jersey 07201. Edwin Haskell was EBN's registered agent.
11. Defendant the Stemple Corporation ("Stemple") was incorporated in the State of New Jersey on October 18, 1968 and owned the Site from 1969 until the time of the Property's sale in 1996. Stemple's former principal place of business was 43-45 South Spring Street, Elizabeth, New Jersey 07201. Edwin Haskell was Stemple's registered agent, and Rose Haskell was the President. Stemple's corporate status was revoked in 1996 for failure to pay annual reporting fees.

12. Edwin and/or Rose Haskell (husband and wife, both deceased) were the principals/owners of EBN and Stemple. Edwin Haskell passed away in 1993. Rose Haskell passed away in 2013. Rose Haskell's will was probated in 2013 or 2014.
13. The executrix of Defendant Estate of Rose Haskell is Elizabeth J. Vivona. Vivona is the daughter of Rose Haskell and resides at 1383 Bally Bunion Drive, Egg Harbor City, New Jersey.
14. The Estate of Rose Haskell is the successor in interest to Defendants EBN and Stemple. EBN, Stemple, and the Estate of Rose Haskell are collectively referred to as the "Haskell Defendants."
15. Upon information and belief, the proceeds of the Haskell Defendants' manufacturing business and ultimate sale of the Site passed into the Estate of Rose Haskell.
16. Defendant Aquaserv Bottled Water Service Inc. ("Aquaserv") is the current owner of the Site and operates a bottled water business out of the building on the Site.
17. Aquaserv was incorporated in the State of New Jersey on January 19, 1995, and its principal place of business is 43 South Spring Street, Elizabeth, New Jersey 07201.
18. Aquaserv's president is Fausto Pennaherra, and its registered agent and vice president is Maria I. Pennaherra.
19. Defendants "XYZ Corporations" 1-10, these names being fictitious, are entities with identities that cannot be

ascertained as of the filing of this Complaint, certain of which are corporate successors to, predecessors of, insurers of, or are otherwise related to Defendants, or are agents of Defendants, such as brokers, attorneys and consultants, that acted unlawfully in the sale of the Site to Aquaserv, and/or are other dischargers of, and/or persons "in any way responsible" for, the hazardous substances discharged at the Site.

20. Defendants "John and/or Jane Does" 1-10, these names being fictitious, are natural individuals whose identities cannot be ascertained as of the filing of this Complaint, certain of whom are partners, officers, directors, and/or responsible corporate officials of, or are otherwise related to Defendants, and/or one or more of the XYZ Corporation defendants, and/or the heir(s) of the Estate of Rose Haskell, and/or agents of Defendants, such as brokers, attorneys and consultants, that acted unlawfully in the sale of the Site to Aquaserv, or any other dischargers of, and/or persons "in any way responsible" for, the hazardous substances discharged at the Property.

SITE BACKGROUND

21. The Property or Site, 43-49 South Spring Street, is designated as Block 9, Lot 1280A on the City of Elizabeth tax map.

22. The Property is situated on approximately 0.25 acres of land in the middle of a narrow triangular area, backing up to the Elizabeth River, which has been used for industrial operations since before 1900. The building occupies most of the space on the Property. The Property also has a small backyard (approx. 0.05 acres) that meets the embankment of the Elizabeth River.
23. The soil in the backyard is contaminated with hazardous substances, including petroleum products, lead and other heavy metals.
24. DEP assigned the Site Program Interest number G000015647.
25. The Site is also assigned ISRA Case #E94109 in connection with the cessation of manufacturing operations in 1993, an event that triggered the requirements of ISRA.
26. Beginning in 1969, EBN manufactured bolts and nuts on the Site, and was an industrial establishment later subject to ISRA.
27. Edwin Haskell passed away in 1993, and upon his death, or shortly thereafter, EBN ceased operations.
28. EBN's cessation of operations triggered obligations under ISRA to be fulfilled by EBN and the Site's then-owner, Stemple.
29. Stemple filed a GIN (General Information Notice) as the initial step in ISRA compliance. Thereafter, DEP notified

Stemple that it had to comply with the requirements of ISRA, including, at a minimum, performing a preliminary assessment ("PA") within 35 days, performing a site investigation ("SI") within 120 days, and submitting a PA/SI report to DEP proposing the issuance of a No Further Action letter ("NFA") or proposing a Remedial Investigation Workplan within 180 days.

30. A central purpose of the PA/SI requirement under ISRA is to determine if the Site is contaminated with any hazardous substances.
31. Stemple did not initiate a PA/SI or take any steps to comply with ISRA after filing the GIN.
32. Despite its non-compliance, Stemple attempted to sell the Site in 1994.
33. However, in March 1994 and April 1994, an environmental contractor working for a prospective purchaser collected eleven soil samples from the backyard area of the Site. All samples were analyzed for Total Petroleum Hydrocarbons and two were tested for heavy metals.
34. The investigation identified levels of Total Petroleum Hydrocarbons ("TPH") and Lead ("Pb") exceeding DEP Soil Cleanup Criteria.
35. TPH is an all-inclusive term for hundreds of different chemical compounds that derive from crude oil. Some TPH

compounds can disrupt a person's central nervous system and cause dizziness and headaches. Others can affect the blood, immune system, lungs, skin, and eyes.

36. TPHs in the soil were as high as 13,894 parts per million ("ppm").
37. The sample with the highest TPH levels from both the March 1994 and April 1994 samplings was also analyzed for US EPA Priority Pollutant Metals. The March 1994 sample contained lead at 1,327 ppm, and the April 1994 sample contained lead at 1,255 ppm, in excess of the DEP Soil Cleanup Criteria for non-residential soil contamination of 800 ppm. Lead is a highly toxic heavy metal. Lead exposure has been causally linked to a host of negative health effects and medical conditions.
38. Exposure to lead can result in lead poisoning, particularly when one is exposed to elevated levels of lead. Lead poisoning can cause abdominal pain, fatigue, headaches, memory loss and other ill effects. Very high levels of lead can also cause anemia, as well as kidney and brain damage.
39. Lead is particularly harmful to children, since it takes much lower levels of lead to poison children than adults. Children exposed to lead can suffer permanent brain damage.

40. An underground storage tank ("UST") was also discovered during the investigation, as were other heavy metals in the soil.
41. On August 24, 1994, DEP was notified of the contamination through a call placed to the DEP Hotline.
42. The August 24, 1994 Hotline report noted that the test results showed the soil to be contaminated with lead and cutting oil. The report also noted that there was an UST present in the ground at the Site, and that the limited soil samples also found copper.
43. To date, DEP has no record of the Haskell Defendants taking any action to remediate the contamination discovered in 1994, and/or to remove or lawfully close the UST, which is still believed to remain in the ground.
44. To date, DEP has no record of the Haskell Defendants doing anything to remediate or otherwise clean up the Site.

AQUASERV'S PURCHASE AND USE OF THE SITE

45. On December 10, 1996, Stemple, with Rose Haskell participating in the transaction as Stemple's president, sold the Site to Aquaserv for \$130,000.
46. The Haskell Defendants sold the Site to Aquaserv without performing any cleanup or complying with ISRA.
47. Upon information and belief, neither Rose Haskell, nor any agent or representative of Stemple or Ms. Haskell, disclosed

to Aquaserv that the Site was contaminated with hazardous substances.

48. The Haskell Defendants affirmatively misrepresented to Aquaserv that the Site was in compliance with environmental standards and did not have any contamination issues.
49. The Haskell Defendants went so far as to affix a sign to the front of the building which read, in part: "APPROVED - STATE OF NEW JERSEY - D.E.P. AND ENERGY - N.J.S.A. 58:10A-24-1-8."
50. Prior to purchasing the Site, Aquaserv did not perform any due diligence investigation and did not satisfy the "all appropriate inquiry" standard as defined by N.J.S.A. 58:10-23.11g.

NOTIFICATION TO DEFENDANTS OF THEIR OBLIGATIONS TO REMEDIATE

51. DEP sent deficiency and notification letters to Rose Haskell and Stemple on April 11, 1994, August 17, 1998, and September 14, 1998, notifying them that they were out of compliance with their ISRA duties, and subject to substantial penalties as a result of their non-compliance.
52. On September 22, 1998, DEP spoke with Elizabeth ("Betty") J. Vivona, Rose Haskell's daughter after sending Rose Haskell correspondence.
53. Vivona stated to the DEP representative that Rose Haskell was the owner of the subject site and that her step-father, Edwin Haskell, was the business operator until his death in

September 1993. The DEP representative was not informed that the Haskell Defendants had sold the Site two years prior in 1996.

54. Vivona requested that she be provided with all future correspondence from DEP, as it was too much for her aging mother to handle.
55. In 2018, DEP sent correspondence to the Haskell Defendants regarding their continued non-compliance, however, the communication they received in return was on behalf of Aquaserv, which advised DEP that it was the current owner of the Site.
56. DEP notified Aquaserv of the contamination known to exist at the Site and advised Aquaserv of its obligations to perform any necessary remediation in accordance with DEP's Technical Regulations for site remediation, N.J.A.C. 7:26E, and related environmental laws and regulations.
57. Aquaserv responded to DEP's outreach via email and contended that it is not responsible.
58. DEP sent several follow-up emails to facilitate the remediation that Aquaserv was required to perform. Aquaserv did not respond to any of those communications.
59. To date, Aquaserv has not taken any action to remediate the Site.

FIRST COUNT

Violation of the Spill Act

60. Plaintiffs repeat each allegation of paragraphs nos. 1 through 59 above as though fully set forth in their entirety herein.
61. Any person who discharges a hazardous substance, or is in any way responsible for any hazardous substance, shall be liable, jointly and severally, without regard to fault, for all cleanup and removal costs no matter by whom incurred, except as otherwise provided in N.J.S.A. 58:10-23.11g12, which is not applicable here. N.J.S.A. 58:10-23.11g.c.(1).
62. N.J.S.A. 58:10-23.11g.d.(3) further provides that, "if a person who owns real property obtains actual knowledge of a discharge of a hazardous substance at the real property during the period of that person's ownership and subsequently transfers ownership of the property to another person without disclosing that knowledge, the transferor shall be strictly liable for the cleanup and removal costs of the discharge and no defense under [N.J.S.A. 58:10-23.11g.d.] shall be available to that person."
63. Pursuant to the Brownfield Act, Defendants are also required to remediate the hazardous substances at the Site.
64. N.J.S.A. 58:10B-1.3 provides that "[a]n owner or operator of an industrial establishment subject to the provisions [of

ISRA], the discharger of a hazardous substance or a person in any way responsible for a hazardous substance pursuant to the provisions of [the Spill Act], . . . shall remediate the discharge of a hazardous substance."

65. Under the Spill Act, the Department may bring an action in the Superior Court for injunctive relief, N.J.S.A. 58:10-23.11u.b.(1); for its unreimbursed investigation, cleanup and removal costs, including the reasonable costs of preparing and successfully litigating the action, N.J.S.A. 58:10-23.11u.b.(2); and for any other unreimbursed costs the Department incurs under the Spill Act, N.J.S.A. 58:10-23.11u.b.(5).
66. The Administrator is authorized under the Spill Act to bring an action in the Superior Court for any unreimbursed costs paid from the Spill Fund under N.J.S.A. 58:10-23.11q.
67. The costs that Plaintiffs have incurred, or will incur, for the remediation of the Property are "cleanup and removal costs" within the meaning of N.J.S.A. 58:10-23.11b., and are recoverable under N.J.S.A. 58:10-23.11u.b.(2), -(4) and -(5).
68. Defendants are "persons" within the meaning of N.J.S.A. 58:10-23.11b.
69. The Haskell Defendants - under N.J.S.A. 58:10-23.11g.c., - d.(3) and -d.(5) - are liable, jointly and severally, without regard to fault, for all cleanup and removal costs Plaintiffs

have incurred, or will incur, in connection with the remediation of hazardous substances at the Site.

70. The Haskell Defendants' failure to comply with ISRA also makes them persons in any way responsible pursuant to the Spill Act. N.J.S.A. 58:10-23.11g.c.

71. As a result of Defendant Aquaserv's 1996 purchase of the contaminated property, Aquaserv is liable, jointly and severally, without regard to fault, for all cleanup and removal costs Plaintiffs have incurred, or will incur, in connection with the remediation of hazardous substances at the Site. N.J.S.A. 58:10-23.11g.c.(1).

72. XYZ Corporations 1-10, are dischargers and/or persons in any way responsible for discharged hazardous substances and are therefore liable, jointly and severally, without regard to fault, for all cleanup and removal costs Plaintiffs have incurred, and will incur, from the discharge of hazardous substances at the Property. N.J.S.A. 58:10-23.11g.c.

73. John and/or Jane Does 1-10 are dischargers, persons in any way responsible for discharged hazardous substances or otherwise liable under the Spill Act, jointly and severally, without regard to fault, in connection with the remediation of hazardous substances at the Site, pursuant to N.J.S.A. 58:10-23.11g.c. and -d.(3).

WHEREFORE, Plaintiffs demand judgment in their favor:

- a. Declaring the Haskell Defendants liable, jointly and severally, without regard to fault, for all cleanup and removal costs no matter by whom incurred, pursuant to N.J.S.A. 58:10-23.11g.c.(1), -d.(3) and -d.(5)
- b. Declaring Defendant Aquaserv liable, jointly and severally, without regard to fault, for all cleanup and removal costs no matter by whom incurred, pursuant to N.J.S.A. 58:10-23.11g.c.(1);
- c. Ordering the Defendants to reimburse Plaintiffs for all cleanup and removal costs Plaintiffs have incurred as a result of the discharge of hazardous substances at the Property, with interest as applicable;
- d. Ordering that Defendants to remediate the Contaminated Site in accordance with N.J.S.A. 58:10B-1.3(b) and all remediation statutes, regulations and/or DEP directions;
- e. Awarding Plaintiffs any other relief this Court deems appropriate; and
- f. Reserving the right to bring a claim against Defendants in the future for natural resource damages arising out of the discharge of hazardous substances at the Property.

SECOND COUNT

**Violation of the Industrial Site Recovery Act
(The Haskell Defendants Only)**

74. Plaintiffs repeat each allegation of Paragraphs Nos. 1 through 73 above as though fully set forth in their entirety herein.
75. Pursuant to N.J.S.A. 13:1D-9, the DEP is vested with the power to: (1) "initiate complaints of pollution of the environment . . .and institute legal proceedings for the prevention of pollution of the environment and abatement of nuisances in connection therewith and shall have the authority to seek and obtain injunctive relief and the recovery of fines and penalties in a court of competent jurisdiction[,]" and (2) "[e]nforce the State air pollution, water pollution, conservation, environmental protection, solid and hazardous waste management laws, rules and regulations, including the making and signing of a complaint and summons for their violation by serving the summons upon the violator and thereafter filing the complaint promptly with a court having jurisdiction[.]"
76. Pursuant to N.J.S.A. 13:1K-13.1(a)(2) and -(c), the Commissioner is empowered to initiate an action in Superior Court to hold the Haskell Defendants liable for their ISRA non-compliance and collect penalties assessed by the court.

77. ISRA further provides that "failure of the transferor [of an industrial establishment] to perform a remediation and obtain department approval thereof as required pursuant to the provisions of this [ISRA] . . . renders the owner or operator of the industrial establishment strictly liable, without regard to fault, for all remediation costs and for all direct and indirect damages resulting from the failure to implement the remedial action workplan." N.J.S.A. 13:1K-13.

78. The Haskell Defendants violated ISRA when they sold an industrial establishment to Aquaserv in 1996 without complying with their ISRA obligations, which are set forth at N.J.A.C. 7:26B.

79. Therefore, under N.J.S.A. 13:1K-13, the Haskell Defendants are strictly liable, without regard to fault, for all remediation costs and for all resulting direct and indirect damages.

80. The Haskell Defendants also violated N.J.A.C. 7:26E by failing, after filing the GIN, to perform a PA within 35 days and an SI within 120 days, and failed to submit a PA/SI report and proposed Remedial Investigation Workplan within 180 days.

WHEREFORE, Plaintiffs demand judgment in their favor:

a. Compelling the Haskell Defendants to comply with ISRA, including but not limited to remediating the Contaminated Site in accordance with 13:1K-6 to -14, N.J.A.C. 7:26E,

- N.J.S.A. 58:10B-1.3(b) and all remediation statutes and regulations;
- b. Awarding all costs recoverable under 13:1K-13(c)(2), including but not limited to reasonable costs of preparing and litigating this matter;
 - c. Awarding Plaintiffs statutory penalties pursuant to 13:1K-13(e) arising from the Haskell Defendants' violations of ISRA, which may be up to \$25,000.00 per day for each day in violation;
 - d. Awarding Plaintiffs any other relief this Court deems appropriate; and
 - e. Reserving the right to bring a claim against Defendants in the future for natural resource damages arising out of the discharge of hazardous substances at the Property.

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiffs

By: s/ Mark A. Fisher
Mark A. Fisher
Deputy Attorney General

DATED: August 27, 2020

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, the Court is advised that Mark A. Fisher, Deputy Attorney General, is hereby designated as trial counsel for Plaintiffs in this action.

CERTIFICATION REGARDING OTHER PROCEEDINGS AND PARTIES

Undersigned counsel hereby certifies, in accordance with R. 4:5-1(b)(2), that the matters in controversy in this action are not the subject of any other pending or contemplated action in any court or arbitration proceeding known to Plaintiffs at this time, nor is any non-party known to Plaintiffs at this time who should be joined in this action pursuant to R. 4:28, or who is subject to joinder pursuant to R. 4:29-1. If, however, any such non-party later becomes known to Plaintiffs, an amended certification shall be filed and served on all other parties and with this Court in accordance with R. 4:5-1(b)(2).

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiffs

By: s/ Mark A. Fisher
Mark A. Fisher
Deputy Attorney General

DATED: August 27, 2020

CERTIFICATION OF COMPLIANCE WITH RULE 1:38-7(C)

Undersigned counsel further certifies that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with R. 1:38-7(b).

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Plaintiffs

By: s/ Mark A. Fisher
Mark A. Fisher
Deputy Attorney General

DATED: August 27, 2020

Civil Case Information Statement

Case Details: UNION | Civil Part Docket# L-002747-20

Case Caption: NJ DEPT. OF ENV. PROTECTION VS
ELIZABETH BOLT &

Case Initiation Date: 08/27/2020

Attorney Name: MARK A FISHER

Firm Name: ATTORNEY GENERAL LAW

Address: 25 MARKET STREET PO BOX 93

TRENTON NJ 08625

Phone:

Name of Party: PLAINTIFF : NJ Dept. of Env. Protection

Name of Defendant's Primary Insurance Company

(if known): Unknown

Case Type: ENVIRONMENTAL/ENVIRONMENTAL COVERAGE
LITIGATION

Document Type: Complaint

Jury Demand: NONE

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Are sexual abuse claims alleged by: NJ Dept. of Env. Protection?
NO

Are sexual abuse claims alleged by: Commissioner of DEP? NO

**Are sexual abuse claims alleged by: Administrator of NJ Spill
Fund?** NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? YES

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

08/27/2020
Dated

/s/ MARK A FISHER
Signed