

**PETITION FOR ZONING RE-CLASSIFICATION AND/OR SPECIAL EXCEPTION**

TO THE ZONING COMMISSIONER OF BALTIMORE COUNTY:

I, or we, John H. Keil and Jo Ann Keil, legal owners of the property situate in Baltimore County and which is described in the description and plat attached hereto and made a part hereof, hereby petition (1) that the zoning status of the herein described property be re-classified, pursuant to the Zoning Law of Baltimore County, from an D.R.-16 zone to an R.R. zone, for the following reasons:

1. That there was an error in the original zoning.
2. That there have been changes in conditions in the area from the original zoning.
3. That the County Council did not consider the subject property in connection with adjoining and contiguous property which it reclassified.

See attached description

Under the said Zoning Law and Zoning Regulations of Baltimore County, to use the herein described property, for:

Property is to be posted and advertised as prescribed by Zoning Regulations. I, or we, agree to pay expenses of above reclassification and/or Special Exception advertising, posting, etc. upon filing of this petition, and further agree to and are to be bound by the zoning regulations and restrictions of Baltimore County adopted pursuant to the Zoning Law of Baltimore County.

John H. Keil  
Contract purchaser  
Jo Ann Keil  
Legal Owner  
Address 2764 York Road

Johnson Bowie  
Petitioner's Attorney  
22 West Pennsylvania Avenue  
Towson, Maryland 21204  
825-6014

Protestant's Attorney

By the Zoning Commissioner of Baltimore County, this 3rd day of September, 1972, that the subject matter of this petition be advertised, as required by the Zoning Law of Baltimore County, in two newspapers of general circulation throughout Baltimore County, that property be posted, and that the public hearing be had before the Zoning Commissioner of Baltimore County in Room 106, County Office Building in Towson, Baltimore County, on the 15th day of September, 1972, at 1:00 o'clock

John W. Hession  
Zoning Commissioner of Baltimore County.  
(over)

IN THE MATTER OF PETITION FOR RECLASSIFICATION FROM D. R. 16 TO B. R. E/S YORK ROAD 100.88' 8. OF TALBOTT AVENUE 8TH DISTRICT - CENTRAL SECTOR

JOHN H. KEIL AND JO ANN KEIL, his wife

Applicants

VS

KATHERINE AMOSS ELVA SKRIVNOR H. DORSEY McLEAN, JR. JOHN COX ALFRED LARSEN KENNETH WOODROW TAYLOR

Protestants

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY AT LAW

Docket Misc. 9 Folio 1 218 Case No. 1 4881

ZONING FILE # 72-56-R

**MEMORANDUM OPINION AND ORDER OF COURT**

The appellants in this zoning case are John H. Keil and Jo Ann Keil, his wife, who are the owners of a parcel of ground containing 1.36 acres, more or less, situate on the east side of the York Road 100.88 feet southeast of Talbott Avenue in the 8th Election District of Baltimore County, Maryland. The parcel has a frontage on the east side of York Road 211.83 feet, with a depth along the north property line of 296.63 feet, and along the south property line of 271.41 feet. The width of the lot in the rear is 210 feet. It is improved with a large dwelling converted into several apartments and several accessory buildings.

The property was classified on the Comprehensive Rezoning Map adopted by the County Council on March 24, 1971 in two sections, the entire frontage along York Road for a depth of 200 feet being zoned as D. R. 16 (Density Residential, 16 dwelling units per acre) and the rear portion as D. R. 3.5 (Density Residential, 3.5 dwelling units per acre). On the east side of the York Road immediately adjoining the subject property on the south is a strip of B. L. (Business, Local) zoning. The property immediately adjoining on the north

to Talbott Avenue and beyond is zoned D. R. 16. On the west side of the York Road there is a strip of B. R. zoning extending from the Timonium State Fair Grounds to a point approximately opposite Talbott Avenue. On the strip is a restaurant, a service station and a retail liquor store which were in existence prior to the adoption of the Rezoning Map on March 24, 1971. At a point approximately opposite Talbott Avenue is a small parcel zoned B. L. operated as an antique shop, and then a strip of D. R. 16 zoning on the west side of York Road extending north to Rose Street. A large area adjoining the strips mentioned on the west side of the York Road is zoned D. R. 3.5. There are residences immediately adjoining the subject tract on the east side of the York Road and along Talbott Avenue. Water is available to the property, but there are no present sewer facilities, although the same are planned in the future.

On August 3, 1971, the appellants filed a petition with the Zoning Commissioner of Baltimore County, seeking a reclassification of the entire property from the existing D. R. 16 and D. R. 3.5 zones to a B. R. zone. At that time, the owners proposed to use the property as a dog kennel and veterinary hospital and it was for this purpose that the rezoning classification was sought. A hearing was held before the Zoning Commissioner on September 15, 1971 and an order was passed on June 5, 1972, by virtue of which the Commissioner denied the reclassification. He gave as his principal reason that the petitioners had not met the burden of proof placed upon them to show error in the Comprehensive Rezoning Map which had been adopted by the Council on March 24, 1971.

On January 17, 1972, the owners entered an appeal from the decision of the Zoning Commissioner and a hearing was held before the County Board of Appeals on June 13, 1972. The Board passed an order on July 12, 1972 denying the reclassification and affirming the Zoning Commissioner, and it is from that order that the present appeal is before this Court. In its written opinion, the Board stated in support of its decision as follows:

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY

IN THE MATTER OF PETITION FOR RECLASSIFICATION FROM D. R. 16 TO B. R. E/S YORK ROAD 100.88' S. OF TALBOT AVENUE 8th DISTRICT-CENTRAL SECTOR

BEFORE COUNTY BOARD OF APPEALS OF BALTIMORE COUNTY No. 72-56-R

**ORDER FOR APPEAL BY JOHN H. KEIL AND JO ANN KEIL, PETITIONERS**

Mr. Clerk: Please enter an appeal on behalf of John H. Keil and Jo Ann Keil, his wife, applicant from the Order of the Court of Appeals of Baltimore County passed in the above case on July 12, 1972.

Johnson Bowie  
Attorney for Applicant  
22 W. Pennsylvania Avenue  
Towson, Maryland 21204  
825-6014

I HEREBY CERTIFY that on this 9 day of August, 1972, a copy of the foregoing Order for Appeal was mailed to County Board of Appeals, County Office Building, Towson, Maryland 21204, and John W. Hession, III, Esq., Alexander Brown Building, Towson, Maryland 21204, Attorney for Protestants.

Johnson Bowie  
Attorney for Applicant

"The Court, in numerous cases, has made it clear that when new comprehensive zoning maps are adopted there is a strong presumption that they are correct."  
"The Board believes that the County Council was fully and properly informed of the merits of the subject property and the neighboring area, and acted in the best interest of the general welfare. The petitioner has failed to overcome the burden of proof to show that the Council erred in such action."

This Court is of the opinion that the decision of the County Board of Appeals was correct under the evidence presented and should be affirmed. Appearing before the Board was the petitioner John H. Keil, one of the property owners and Henry F. LeBrun, a qualified real estate appraiser and broker. At the time of the hearing before the Board, the owners realized their request for a proposed kennel and veterinary hospital would be in direct violation of Section 411.2 of the Baltimore County Zoning Regulations requiring that such a facility be located at least 200 feet from the boundary of the nearest residential zone. The petitioners, therefore, abandoned this contemplated use of the property and sought a rezoning of the entire tract to a B. R. category. The principal contention advanced by Mr. LeBrun, the petitioners' expert witness, was to the effect that although there had been no zoning reclassifications in the area since the adoption of the Zoning Map of March 24, 1971, several business establishments had been developed on commercially zoned land, particularly at the intersection of Fadoles and York Roads. He further felt that the entire York Road Corridor should be adopted for commercial use. It is true that Mr. LeBrun's opinion may be subject to realization and fruition at some time in the future, but such an opinion does not justify a conclusion of error in the Map which had been adopted by the County Council approximately four and a half months prior to the filing of the petition for rezoning. At the time of its decision, the Board of Appeals had before it the report of the Baltimore County Planning Board for the April-October cycle 1971, adopted July 15, 1971. This report was introduced in evidence as an exhibit on behalf of the petitioners. On Page 34 of said report, it is stated:

**EXPLANATION FOR ZONING RECLASSIFICATION FOR JOHN H. KEIL 2331 York Road**

The Baltimore County Council committed an error in not zoning the subject property commercial (B.R.). The nature of the traffic, manufacturing and business uses along the majority of York Road makes it undesirable for residential uses. My client's property adjoins a commercially zoned property on the south and lies within two hundred (200) feet, more or less, of a commercial property on the west side of York Road.

"The Planning Board and County Council, in recommending D. R. 16 on both sides of York Road in this location, intended the use to be offices so as to prevent further commercial strip development."

"There appears to be no error in the zoning recommended first by the Planning Board and then adopted by the County Council."  
"It is therefore recommended that the existing zoning, D. R. 16 and D. R. 3.5, be retained."

**of a comprehensive rezoning, Mayor and Council of Rockville v. Hanley and Smith v. Co. Comm'rs of Howard Co., both supra.**

This Court is of the opinion that the evidence offered in support of the contention of the appellants before the Board of Appeals was not of such a character as to justify the Board in ruling that the strong presumption of the correctness of the Comprehensive Rezoning Map adopted by the County Council on March 24, 1971, had been overcome. At least the issue before the Board was a fairly debatable one and its decision must be sustained.

For the reasons stated, it is this 11th day of September, 1973, by the Circuit Court for Baltimore County ORDERED that the Order of the County Board of Appeals passed under date of July 12, 1972, denying the reclassification sought in the petition filed on behalf of the appellants John H. Keil and Jo Ann Keil, his wife, be and the same is hereby affirmed, the appellants to pay the costs in this Court.

SO. WALTER M. KIMMER  
Judge

"Appellants are correct in citing the test to be applied here. Where a legislative body, or a board of county officials, pursuant to authority conferred upon it, has granted a rezoning of property, the question on judicial review is whether or not such action is arbitrary and discriminatory or fairly debatable. Montgomery County v. Plaintiffs, 256 Md. 452, 295 A. 2d 216 (1972); Himmelfarb v. Charmock, 258 Md. 636, 267 A. 2d 179 (1970); Chevy Chase Village v. Mont. Co., 258 Md. 27, 264 A. 2d 861 (1970); Smith v. Co. Comm'rs of Howard Co., 252 Md. 280, 249 A. 2d 708 (1969). We shall follow that test in considering this appeal."

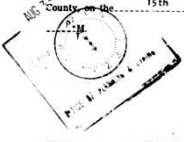
"While, in recent years, we have had occasion to enunciate a number of important principles applicable to the law of zoning, perhaps none is more rudimentary than the strong presumption of the correctness of original zoning and of comprehensive zoning. To sustain a piecemeal change in circumstances such as those present here, strong evidence of mistake in the original zoning or comprehensive rezoning or evidence of substantial change in the character of the neighborhood must be produced. Mayor and Council of Rockville v. Hanley, Md., A. 2d (1973) (No. 198, September Term, 1972, decided March 23, 1973); Haller v. Prince George's Co., 264 Md. 410, 412, 286 A. 2d 772 (1972); Crawell v. Baltimore Aviation, 257 Md. 712, 721, 264 A. 2d 838 (1970). Since, as we have also said, this burden is onerous, Cabin John Ltd. v. Montgomery Co., 259 Md. 661, 271 A. 2d 174 (1970); Crawell v. Baltimore Aviation, supra; Wells v. Pierpont, 253 Md. 354, 253 A. 2d 749 (1969), the task confronting appellants, whose application followed the comprehensive rezoning by merely four months, is manifestly a difficult one."

"The first question posed, then, is whether on the issue of mistake in the comprehensive rezoning of March 1971, the evidence in support of that contention was sufficiently 'strong' to make the issue fairly debatable. We think not. There are bald allegations to be sure, but these are unsubstantiated by facts sufficient to overcome the presumption of correctness which attaches with the adoption

JOHN H. KEIL  
E/S of York Rd. 100.88' S of 8th  
Talbot Ave.

Book 11/17/72  
9 30 AM

72-56-R  
JH/K



RE: PETITION FOR RECLASSIFICATION : BEFORE  
 from D.R. 16 to B.R. : COUNTY BOARD OF APPEALS  
 E/S York Road 100.88' : OF  
 S. of Talbott Avenue : BALTIMORE COUNTY  
 8th District - Central Sector :  
 John H. Keil, et ux :  
 Petitioners : No. 72-56-R

**OPINION**

This case comes before the Board on an appeal by the Petitioner from an Order of the Zoning Commissioner, dated January 5, 1972, denying the requested petition. The subject tract is located on the east side of York Road, one quarter of a mile north of the Timonium Fair Grounds and some 100 feet south of Talbott Avenue, in the Eighth Election District of Baltimore County, Maryland. The property is 1.36 acres in size, (see plat, Petitioner's Exhibit #1). The front portion now is zoned D.R. 16 and the rear portion is zoned D.R. 3.5, which classifications were established by the Baltimore County Council upon its adoption, on March 24, 1971, of a new comprehensive zoning map for the area. Prior to that time the entire subject tract was in an R-10 zoning category. The subject property is improved with a large multi-family dwelling, several accessory buildings and a closed swimming pool. The Petitioner herein seeks to have the entire tract reclassified to B.R. (Business, Roadside). He claims that the County Council erred in not so zoning the tract upon adopting the new comprehensive zoning map. To support his claim of error, the Petitioner put on testimony to the effect that the County Council had not given his property equal treatment on zoning as compared with other nearby properties which are zoned for commercial use, (see Petitioner's Exhibit #5); that it is not economically feasible to develop the tract in its present zoning, and that the County Council failed to consider the extension of sewer and water utilities then being proposed to serve the site. Several neighbors, whose homes are located contiguously to the subject, protested the granting of the petition. They objected primarily to having additional commercial zoning in the area. The Petitioner previously had requested the County Council to reclassify his property in conjunction with the adoption of the comprehensive zoning map. However,

John H. Keil, et ux - #72-56-R 2.

The Council decided to rezone it to D.R. 16 and D.R. 3.5, as it now is, instead of to the requested B.R. zoning. Such action by the Council was reinforced by it having received the same recommendation from the Baltimore County Planning Board.

In the Report of the Baltimore County Planning Board prepared for the April-October 1971 zoning cycle, which is in evidence as Petitioner's Exhibit #2, we find the following comment on page 34:

"The Planning Board and County Council, in recommending D.R. 16 on both sides of York Road in this location, intended the use to be offices so as to prevent further commercial strip development."

Furthermore, the Petitioner's own witness testified that, in his opinion, the rear portion of the subject property should remain D.R. 3.5.

The Court, in numerous cases, has made it clear that when new comprehensive zoning maps are adopted there is a strong presumption that they are correct.

The Board believes that the County Council was fully and properly informed of the merits of the subject property and the neighboring area, and acted in the best interest of the general welfare. The Petitioner has failed to overcome the burden of proof to show that the Council erred in such action.

Therefore, for these reasons, and from all of the testimony and evidence presented, the Board will affirm the Order of the Zoning Commissioner, dated January 5, 1972, and will hereby deny the requested petition.

**ORDER**

For the reasons set forth in the foregoing Opinion, the Board on this the Order of the Zoning Commissioner, dated January 5, 1972; therefore, it is this 12th day of July, 1972, by the County Board of Appeals, ORDERED that the reclassification petitioned for, be and the same is hereby DENIED.

Any appeal from this decision must be in accordance with Chapter 1100, subtitle 3 of Maryland Rules of Procedure, 1961 edition.

COUNTY BOARD OF APPEALS  
 OF BALTIMORE COUNTY  
 John A. Slawik, Chairman  
 Walter A. Keiser, Jr.  
 John A. Miller

PETITION FOR RECLASSIFICATION : BEFORE THE  
 E/S of York Road, 100.88' S of Talbott Avenue - 8th District : ZONING COMMISSIONER  
 John H. Keil, et ux - Petitioners :  
 No. 72-56-R (Item No. 15) : OF  
 BALTIMORE COUNTY

Mr. Commissioner:  
 Please enter an appeal to the Board of Appeals from your Order dated January 5, 1972, in the above entitled matter.

John H. Keil  
 John H. Keil  
 Jo Ann Keil, his wife  
 Petitioners  
 Johnson Bowie  
 Attorney for Petitioners

I HEREBY CERTIFY that on the 17 day of June, 1972, copy of the foregoing was mailed to John W. Hession, III, Esq., 102 W. Penna. Ave., Towson, Maryland 21284.

Johnson Bowie  
 Attorney for Petitioners

RE: PETITION FOR RECLASSIFICATION : BEFORE THE  
 E/S of York Road, 100.88' S of Talbott Avenue - 8th District : ZONING COMMISSIONER  
 John H. Keil, et ux - Petitioners : OF  
 No. 72-56-R (Item No. 15) : BALTIMORE COUNTY

The Petitioners request a Reclassification from D.R.16 and D.R.3.5 Zones to a B.R. Zone, for a parcel of property located on the east side of York Road, 100.88 feet south of Talbott Avenue, in the Eighth District of Baltimore County, consisting of 1.36 acres of land, more or less.

Testimony on behalf of the Petitioners indicated that they were requesting a B.R. Zone for the subject property in order to utilize the property as a kennel. The only testimony as to error, on the Comprehensive Zoning Map, was that of a possible lack of knowledge on behalf of the Baltimore County Council as to the impending installation of sewerage for the area.

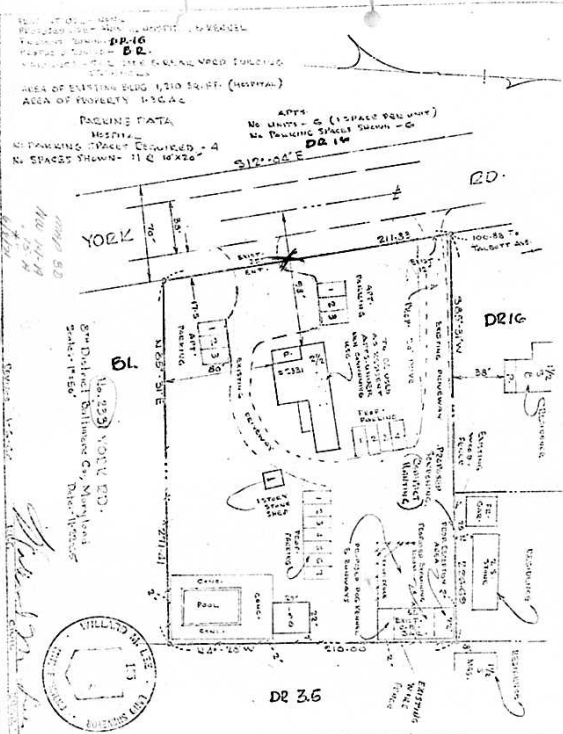
Testimony on behalf of the residents of the area, in protest of the subject Petition, indicated that such use of the property would be detrimental to their health, safety and general welfare because of noise, odors, etc., emanating from the property.

Without reviewing the evidence further in detail but based on all the evidence presented at the hearing, in the judgment of the Zoning Commissioner, the Comprehensive Zoning Map, as adopted by the Baltimore County Council on March 24, 1971, is presumed to be correct, and the burden of proof is upon the Petitioners to show error. This burden has not been met.

Therefore, IT IS ORDERED by the Zoning Commissioner of Baltimore County this 5th day of January, 1972, that the above Reclassification be and the same is hereby DENIED and that the above described property or area be and the same is hereby continued as and to remain D.R.16 and D.R.3.5 Zones.

John W. Hession, III  
 Zoning Commissioner of Baltimore County

WALTER A. KEISER, JR.  
 4604 MAINFIELD AVENUE  
 BALTIMORE 16, MARYLAND  
 Phone - BR 6-2835  
 November 22, 1965  
 No. 2331 York Road  
 East side of York Road 100.88 feet southeast of Talbott Avenue  
 8th District Baltimore County, Maryland  
 Beginning for the same on the east side of York Road at the distance of 100.88 feet measured along the east side of York Road from the south side of Talbott Avenue and thence running and binding on the east side of York Road South 12 degrees 04 minutes East 211.83 feet thence leaving York Road for three lines of division as follows: North 85 degrees 31 minutes East 271.41 feet, North 4 degrees 28 minutes West 210 feet and South 85 degrees 31 minutes West 290.69 feet to the place of beginning.  
 Containing 1.36 acres of land.



23 Talbott Avenue  
 Timonium, Maryland 21093  
 March 24, 1972

Zoning Appeal Board of Baltimore County  
 Towson, Maryland 21286

Dear Sirs:  
 As I may not have an opportunity at the March 29th hearing to express my opinion on the boarding dog kennels that Dr. Keil would like to establish at 2331 York Road in Timonium, I am taking this means of conveying my thoughts to you.

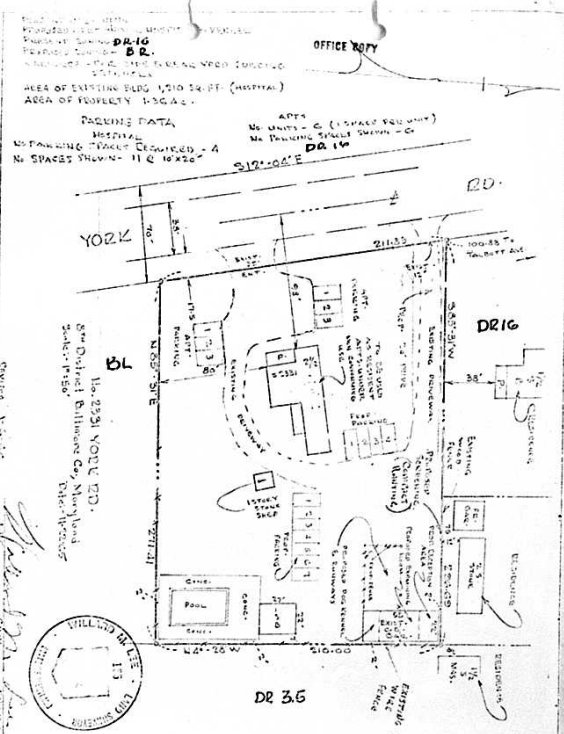
We own six acres of land in back of or east of the Keil property and have lived here since 1948. This has been a quiet neighborhood of neat well kept homes and very agreeable people. We realize that progress is desirable and that changes will take place especially along the York Road. As long as these changes do not seriously affect our comfort and way of life we will not complain.

As a senior citizen and retired school teacher who has lived here a long time, I feel qualified to speak for the neighborhood in objecting to having a boarding dog kennel at 2331 York Road. I have circulated a petition objecting to the rezoning of the Keil property for the purpose mentioned and in doing so I have gained first hand knowledge of the way the neighbors feel about it. All are against having a dog kennel in our midst and all but two signed the petition. These two apparently have a policy of not signing anything of this sort.

A few years ago when Dr. Keil bought the York Road property, he called on some of us and painted a beautiful picture of what he intended to do if permitted to establish a veterinary hospital and boarding kennel for dogs. In the ensuing years we have had an opportunity to observe just how Dr. Keil manages and maintains a property. What was once an attractive place has deteriorated from year to year until it has become an eyesore and a disgrace to the neighborhood. On March 12, 1972 Mr. Brown and I walked around the Keil place and took some pictures showing its close proximity to the neighbors and the deplorable condition of the yard, swimming pool and out buildings. We are submitting these pictures for your evaluation. Add to this the noise and smell of a large number of dogs and you can understand why we neighbors are alarmed and so vigorously oppose the establishing of this dog kennel in our midst.

Respectfully yours,

Clarence Robbe  
 Clarence Robbe  
 3517 1/2 Adams Ave. Phone BR 6-2835  
 Baltimore, Md. 21218



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*Witness in the case who would have to appear at the hearing and testify. He said he plans to attend the hearing and advised if he should present the petition mentioned in the letter at that time. I asked if he was represented by Mr. Hessian and after confirming this, I advised him to consult Mr. Hessian on this point.*

ETE

V.S.  
J.H. Slawik

*Rec'd 2/13/77  
11/15/76  
Approved  
for 2/13/77*

RE: PETITION FOR RECLASSIFICATION  
from D.R. 16 and D.R. 3.5 zones to  
B.R. zone  
E/S of York Road 100.88 feet S. of  
Talbot Avenue  
8th District, Central Sector  
John H. Kell and Jo Ann Kell  
Petitioners - Appellants  
Zoning File No. 72-56-R  
Misc. Docket No. 9  
Folio No. 218  
File No. 4881

ANSWER TO ORDER OF APPEAL TO CIRCUIT  
COURT FOR BALTIMORE COUNTY AND  
CERTIFIED COPIES OF PROCEEDINGS BEFORE  
THE ZONING COMMISSIONER AND BOARD  
OF APPEALS OF BALTIMORE COUNTY

Mr. Clerk:

Please file, &c.

Muriel E. Buddemeier  
County Board of Appeals of Baltimore County

cc: Zoning  
J. Bowie, Esq.  
J. Hessian, Esq.

*Zoning File # 72-56-R  
John H. Kell*

IN THE MATTER OF THE PETITION : IN THE CIRCUIT COURT  
FOR RECLASSIFICATION FROM D.R. 16  
TO B.R. zone - E/S York Road 100.88'  
8th District - Central Sector : Misc. Docket No. 9/218/4881

MEMORANDUM OF AUTHORITIES

Jolar Corp. v. Rogers Corp., 236 Md. 104  
Aspen Hill Venture v. Montgomery County Council, 265 Md. 303.  
Transcript - Appellant feels that the entire transcript has to be read.  
However, particular attention is directed to Mr. Leibrun's testimony (real estate expert), beginning at page 21 through page 52; and also to remarks of counsel for protestants on page 52.

*John Bowie*  
John Bowie  
Attorney for Petitioners

I HEREBY CERTIFY that copy of the foregoing was mailed February 13, 1977, to the County Board of Appeals, County Office Building, Towson, Maryland 21284, and John W. Hessian, III, Esq., 102 West Penna. Ave., Towson, Maryland 21284.

*John Bowie*  
John Bowie  
Attorney for Petitioners

COPY

RE: PETITION FOR RECLASSIFICATION : IN THE CIRCUIT COURT  
from D.R. 16 and D.R. 3.5 zones :  
to B.R. zone :  
E/S of York Road 100.88 feet S. : FOR BALTIMORE COUNTY  
of Talbot Avenue :  
8th District, Central Sector :  
John H. Kell and Jo Ann Kell : AT LAW  
Petitioners - Appellants : Misc. Docket No. 9  
Zoning File No. 72-56-R : Folio No. 218  
File No. 4881

ANSWER OF PROTESTANTS TO PETITION  
IN SUPPORT OF APPEAL

The Answer of KATHERINE AMOS, ELVA SKRIVNOR, R. DORSEY  
McLEAN, JR., JOHN CUX, ALFRED LANSER and MARGARET WOODROW TAYLOR, Protestants  
below, to the Petition in support of the Appeal heretofore filed by John H.  
Kell and Jo Ann Kell, by Hessian & Iglehart, and John W. Hessian, III, their  
attorney, respectfully shows:

1. That they admit the matters and facts alleged in the last paragraph of said Petition.
2. Answering the 2nd paragraph of said Petition, the Protestants admit that E. M. Francis Leibrun did testify at the hearing before the County Board of Appeals; with that sole exception, however, the Protestants deny each and every of the other allegations in said paragraph made. Further and generally answering the allegations in said Paragraph 2, the Protestants say that the opinion of the County Board of Appeals and the findings of facts therein contained upon which it based its Order were patently correct, and the conclusions drawn therefrom manifestly proper.

WHEREFORE, these Protestants pray that the Order of the County Board of Appeals be sustained, the Petitioners' Appeal be denied, and that they be hence dismissed with their proper costs.

HESSIAN & IGLEHART

By  
John W. Hessian, III  
Attorneys for Protestants

HESSIAN & IGLEHART  
TOWSON, MD. 21284

*Rec'd 2/13/77  
9/2/76*

RE: PETITION FOR RECLASSIFICATION : IN THE  
from D.R. 16 and D.R. 3.5 zones to : CIRCUIT COURT  
B.R. zone :  
E/S of York Road 100.88 feet S. of : FOR  
Talbot Avenue : BALTIMORE COUNTY  
8th District, Central Sector : AT LAW  
John H. Kell and Jo Ann Kell : Misc. Docket No. 9  
Petitioners - Appellants : Folio No. 218  
Zoning File No. 72-56-R : File No. 4881

TO THE HONORABLE, THE JUDGE OF SAID COURT:

And now come John A. Slawik, Walter A. Reiter, Jr. and John A. Miller, constituting the County Board of Appeals of Baltimore County, and in answer to the Order for Appeal directed against them in this case, herewith return the record of proceedings had in the above entitled matter, consisting of the following certified copies or original papers on file in the office of the Zoning Department of Baltimore County.

ZONING ENTRIES FROM DOCKET OF ZONING COMMISSIONER OF BALTIMORE COUNTY

- No. 72-56-R
- May 18, 1971 Comments of Baltimore County Zoning Advisory Committee - filed
  - Aug. 3 Petition of John H. Kell and Jo Ann Kell for reclassification from D.R. 16 and D.R. 3.5 zones to B.R. zone, on property located on the east side of York Road 100.88' south of Talbot Ave., 8th District-Central Sector - filed
  - " 3 Order of Zoning Commissioner directing advertisement and posting of property - date of hearing set for September 15, 1971 at 1:00 p.m.
  - " 26 Certificate of Posting of property - filed
  - " 26 Certificate of Publication in newspaper - filed
  - Sept. 15 At 1:00 p.m., hearing held on petition by Zoning Commissioner - case held sub curie
  - Jan. 5, 1972 Order of Zoning Commissioner denying reclassification
  - " 17 Order of Appeal to County Board of Appeals from Order of Zoning Commissioner
  - June 13 Hearing on appeal before County Board of Appeals - case held sub curie

- July 12, 1972 Order of County Board of Appeals denying reclassification
- Aug. 9 Order for Appeal filed in the Circuit Court for Baltimore County by Johnson Bowie, Esq., attorney for Petitioners-Appellants
- " 11 Certificate of Notice sent to all interested parties
- " 24 Petition to accompany Order for Appeal filed in Circuit Court for Baltimore County
- " 30 Transcript of testimony filed - 1 volume
- Petitioner's Exhibit No. 1 Plat of subject property - as marked D.R. 3.5 and D.R. 16 - by Willard Lee, 1/4/66
- " " 2 Item #15, 1st cycle, Planning Bd. to Z.C. 7/15/71 (p. 34 and 35)
- " " 3 State Roads Commission letter re York Rd. Timonium to Shawsen, 9/18/70
- " " 4 Plat, v/w 68-041-3A - Balto. County
- " " 5 Mr. Leibrun - Summary of his comments - 2 pages
- " " 6 200' scale photogrammetric, NW 14 A
- " " 7 " " " NW 15 A
- " " 8 Zoning file - No. 72-56-R
- Protestants' Exhibit A Official zoning map 8 D - showing subject property
- " " B 1 thru B 5 Photos - Mrs. Amos, etc.
- " " C Photo - McLean
- " " D List of Protestants at hearing
- Sept. 7 Record of proceedings filed in the Circuit Court for Baltimore County
- Record of proceedings pursuant to which said Order was entered and said Board acted are permanent records of the Zoning Department of Baltimore County, as are also the use district maps, and your respondents respectively suggest that it would be inconvenient and inappropriate to file the same in this proceeding, but your respondents will produce any and all such rules and regulations, together with the zoning use district maps at the hearing on this petition, or whenever directed to do so by this Court.

Respectfully submitted,  
Muriel E. Buddemeier  
County Board of Appeals of Baltimore County

BALTIMORE COUNTY BOARD OF APPEALS  
ZONING ADVISORY COMMITTEE MEETING  
OF BALTIMORE COUNTY

Petitioners: Kell, et al  
Location:  
District: Y  
Present Zoning: D.R. 16  
Proposed Zoning: B.R.  
No. of Acres: 1.34

Comments: No. 68-041-3A - BALTO. COUNTY

TO: Mr. Edward D. Hardesty, Zoning Commissioner  
Attn: Mr. Myers

FROM: Planning Division  
Fire Prevention Bureau  
SUBJECT: Property Owner:  
John H. Keil, et ux

Location: E/S York Road, 100.88' S. of Talbot Avenue

Item # 15

The Fire Department has no comment on the propose site.

*H. Thomas Kelly*  
Planning Division  
Fire Prevention Bureau

BALTIMORE COUNTY ZONING ADVISORY COMMITTEE

May 18, 1971

COUNTY OFFICE BLDG.  
111 W. Chesapeake Ave.  
Towson, Maryland 21284

Mr. OLIVER L. MYERS  
Chairman

MEMBERS

BUREAU OF  
ENGINEERING  
DEPARTMENT OF  
TRAFFIC ENGINEERING

STATE ROADS COMMISSION

BUREAU OF  
FIRE PREVENTION

HEALTH DEPARTMENT

PROJECT PLANNING

BUILDING DEPARTMENT

BOARD OF EDUCATION

ZONING ADMINISTRATION

INDUSTRIAL  
DEVELOPMENT

Mr. George E. Gavrellis  
Director  
Office of Planning and Zoning  
301 Jefferson Building  
Towson, Maryland 21284

RE: Item 15 (April - October Cycle 1971)  
Property Owner: John H. Keil, et ux  
Location: E/S York Road, 100.88' S of  
Talbot Avenue  
Present Zoning: D.R. 16  
Proposed Zoning: Reclassification B.R.  
Districts: 8th Sector: Central  
No. Acres: 1.36

Dear Mr. Gavrellis:

The Zoning Advisory Committee has reviewed the plans submitted with the above referenced petition and has made an on site field inspection of the property. The following comments are a result of this review and inspection.

The subject property is presently improved with a large dwelling which is multi-family in character with several out-buildings to the rear or eastern most portion of the property. A large swimming pool exists with bath house and garage which the Petitioner intends to convert into a kennel. The property to the north is improved with residents as well as the property to the east and west. The property to the south is improved with an office complex zoned B.L. York Road in this location is macadamized but is not improved as far as a concrete curb and gutter are concerned.

BUREAU OF ENGINEERING

Highways

York Road (U.S. 111) is a State Road; therefore, this site will be subject to State Roads Commission review and all street improvements and entrance locations on this road will be subject to State Roads Commission requirements.

Storm Drains

The Petitioner must provide necessary drainage facilities (temporary or permanent) to prevent creating any nuisance or damage to adjacent

Item 15

properties, especially by the concentration of surface waters. Correction of any problem which may result, due to improper grading or improper installation of drainage facilities, would be the full responsibility of the Petitioner.

York Road (U.S. 111) is a State Road. Therefore, drainage requirements as they affect the road come under the jurisdiction of the Maryland State Roads Commission.

Sediment Control

Development of this property through stripping, grading and stabilization could result in a sediment pollution problem, damaging private and public holdings below this property, and sediment control is required by State law. A grading permit is, therefore, necessary for all grading, including the stripping of top soil.

Grading studies and sediment control drawings will be necessary to be reviewed and approved prior to the issuance of any grading or building permits.

Water

Public water supply is available to serve this property.

Sanitary Sewer

Public sanitary sewerage is not available to serve this property. However, public sanitary sewerage will be available to serve this site when the proposed Titanium Heights and Mayside sanitary sewerage (A.O. 1-2-312) is constructed in the future. The construction schedule for this sewerage is indefinite at this time.

The plat submitted does not adequately reflect the existing or required public improvements to this site for storm drain facilities and sanitary sewerage facilities or private improvements on site for storm drain facilities, water system and sanitary sewerage system.

The plan should be revised to reflect these items.

STATE ROADS COMMISSION

The frontage of the subject site must be curbed with concrete curb and gutter. The roadside face of curb is to be 21' from and parallel to the center line of York Road. The proposed right-of-way for York is 82' and 10' from center.

The existing northerly entrance is in an area of poor stopping sight distance and should be eliminated.

The entrance will be subject to State Roads Commission approval and permit.

The plan must be revised prior to the hearing.

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Item 15

- 3 -

PROJECT PLANNING DIVISION

The proposed use would not be permitted under Section 270 of the Baltimore County Zoning Regulations because of the close proximity of residential property.

DEPARTMENT OF TRAFFIC ENGINEERING

The subject petition as presently zoned could generate 150 trips per day. As proposed, the trip density can be expected to increase to 700 trips per day.

The subject petition is within the York Road Corridor which at the present time, is at capacity. This increased trip density can be expected only to compound the problem.

HEALTH DEPARTMENT

Public water is available to the site.

This office will not approve this operation at this location until such time as public sewer is made available.

BUILDING ENGINEER'S OFFICE

Petitioner to meet all applicable requirements of Baltimore County Building Code and Regulations. See Multiple occupancies Section 400.3 and Business Occupancies Section 404.

FIRE PREVENTION BUREAU

The Fire Department has no comment on the proposed site.

BOARD OF EDUCATION

No bearing on student population.

ZONING ADMINISTRATION DIVISION

The Petitioner indicates on his site plan that the proposed kennel is to be located within the existing garages located at the northwest corner of the subject property. This is in direct violation of Section 421.2 of the Baltimore County Zoning Regulations which requires a kennel or veterinarian to be located at least two hundred (200) feet from the nearest property line. The Petitioner neglected to request a Variance to this setback on the original petition which has been advertised as per Bill 72 under period one.

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Item 15

This property is located within the York Road Corridor which is already at peak capacity. Any additional higher density zoning will only tend to compound the already existing traffic congestion on York Road. There is poor stopping sight distance for the northern most entrance of the property. This entrance should be eliminated and one entrance to the good stopping site distance can be obtained. It appears that this petition is premature since no public sanitary sewer is available to the site. Since the Health Department will not grant any application for any type building on this site until public water and sewer is available, it is suggested that a decision on the subject property be withheld until that time.

Very truly yours,

*Oliver L. Myers*  
OLIVER L. MYERS  
Chairman

OLM:mcc

cc: Mr. Edward D. Hardesty  
Zoning Commissioner

Johnson Bowie, Esquire  
22 West Pennsylvania Avenue  
Towson, Maryland 21204

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: Zoning Date: April 25, 1971  
FROM: Jack Dietrich - Plans Review  
SUBJECT: John H. Keil, et ux  
E.S. York Road  
100.88' S. of Talbot Avenue  
District: 8

Petitioner to meet all applicable requirements of Baltimore County Building Code and regulations. See Multiple occupancies Section 400.3 and Business Occupancies Section 404.

*Jack Dietrich*  
Jack Dietrich - Plans Review

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: Mr. Oliver Myers Date: May 14, 1971  
FROM: Ian J. Forrest  
SUBJECT: Item 15

15. Property Owner: John H. Keil, et ux  
Location: E/S York Rd., 100.88' S. of Talbot Ave.  
Present Zoning: D.R. 16  
Proposed Zoning: Reclass to B.R.  
District: 8th Sector: Central  
No. Acres: 1.36

Public water is available to the site.

This office will not approve this operation at this location until such time as public sewer is made available.

*Ian J. Forrest*  
Chief  
Water and Sewer Section  
BUREAU OF ENVIRONMENTAL HEALTH

IJF/ann

BALTIMORE COUNTY, MARYLAND

DEPARTMENT OF TRAFFIC ENGINEERING  
JEFFERSON BUILDING  
TOWSON, MARYLAND 21284  
INTER-OFFICE CORRESPONDENCE

TO: Edward D. Hardesty Date: May 11, 1971  
Attn: Oliver L. Myers  
FROM: C. Richard Moore  
SUBJECT: Item 15 - Cycle Zoning  
Property Owner: John H. Keil et ux  
York Road south of Talbot Avenue  
Reclassification to BR

The subject petition as presently zoned could generate 150 trips per day. As proposed, the trip density can be expected to increase to 700 trips per day.

The subject petition is within the York Road corridor which at the present time, is at capacity. This increased trip density can be expected only to compound the problem.

*C. Richard Moore*  
C. Richard Moore  
Assistant Traffic Engineer

CRM:nr

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

Mr. Edward D. Hardesty  
 TO Zoning Commissioner Date May 11, 1971  
 FROM Project Planning Division  
 SUBJECT Zoning Advisory Agenda Item #15

April 27, 1971  
 John H. Keil, et al  
 E/S York Road 100.88' S. of  
 Talbot Avenue

This office has reviewed the subject site plan and offer the following comments:

The proposed use would not be permitted under Section 270 of the Baltimore County Zoning Regulations because of the close proximity of residential property.

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO Edward Hardesty Date May 11, 1971  
 ATTN: Oliver L. Myers  
 FROM Elisabeth N. Diver, P.E.  
 SUBJECT Item #15 (April - October 1971)  
 Property Owner: John H. Keil, et ux  
 Location: E/S York Road, 100.88' S. of Talbot Avenue  
 Present Zoning: D.R. 16  
 Proposed Zoning: Reclass. to B.R.  
 District: 8th Sector: Central  
 No. Acres: 1.36

The following comments are furnished in regard to the plat submitted to this office for review by the Zoning Advisory Committee in connection with the subject item.

Highways:

York Road (U.S. 111) is a State Road; therefore, this site will be subject to State Roads Commission review and all street improvements and entrance locations on this road will be subject to State Roads Commission requirements.

Storm Drains:

The Petitioner must provide necessary drainage facilities (temporary or permanent) to prevent creating any nuisances or damages to adjacent properties, especially by the concentration of surface waters. Correction of any problem which may result, due to improper grading or improper installation of drainage facilities, would be the full responsibility of the Petitioner.

York Road (U.S. 111) is a State Road. Therefore, drainage requirements as they affect the road come under the jurisdiction of the Maryland State Roads Commission.

Sediment Control:

Development of this property through stripping, grading and stabilization could result in a sediment pollution problem, damaging private and public holdings below this property, and sediment control is required by State law. A grading permit is, therefore, necessary for all grading, including the stripping of top soil.

Grading studies and sediment control drawings will be necessary to be reviewed and approved prior to the issuance of any grading or building permits.

Water:

Public water supply is available to serve this property.

Item #15 (April - October 1971)  
 Property Owner: John H. Keil, et ux  
 Page 2  
 May 3, 1971

Sanitary Sewer:

Public sanitary sewerage is not available to serve this property. However, public sanitary sewerage will be available to serve this site when the proposed Tincinum Heights and Nayvide sanitary sewerage (D.O. 10-212) is constructed in the future. The construction schedule for this sewerage is indefinite at this time.

The plat submitted does not adequately reflect the existing or required public improvements to this site for storm drain facilities and sanitary sewerage facilities or private improvements onsite for storm drain facilities, water system and sanitary sewerage system.

The plan should be revised to reflect these items.

*Elisabeth N. Diver*  
 ELISABETH N. DIVER, P.E.  
 Chief, Bureau of Engineering

END:EAM:GMR:es

cc: File (3)

Key Sheet: S-W  
 Position Sheet: 56 and 57 NW 3  
 Twp: NW 14 and 15 A  
 Tax: 51



STATE OF MARYLAND  
 STATE ROADS COMMISSION  
 300 WEST PRATTON STREET  
 BALTIMORE, MD 21201

April 29, 1971

Mr. Edward D. Hardesty  
 Zoning Commissioner  
 County Office Bldg.  
 Towson, Maryland

Attn: Mr. O. L. Myers

Dear Mr. Hardesty:

The frontage of the subject site must be curbed with concrete curb and gutter. The roadside face of curb is to be 31' from and parallel to the centerline of York Road. The proposed right of way for York Road is 82', 40' from center.

The existing northerly entrance is in an area of poor stopping sight distance and should be eliminated.

The entrance will be subject to State Roads Commission approval and permit.

The plan must be revised prior to a hearing, ~~and before the hearing~~.

Re: Item 15.  
 Z.A.C. Meeting April 27, 1971  
 Property Owners: John H. Keil, et ux  
 Location: E/S York Road (Rte 45)  
 100.88' S. of Talbot Ave.  
 Present Zoning: D.R. 16  
 Proposed Zoning: Reclass to B.R.  
 District: 8th Sector: Central  
 No. Acres: 1.36

Very truly yours,  
 Charles Lee, Chief  
 Development Engineering Section  
 by John L. Meyers  
 Asst. Development Engineer

CL:JEM:dk

*Official*  
 CERTIFICATE OF POSTING

ZONING DEPARTMENT OF BALTIMORE COUNTY  
 Towson, Maryland

#72-56-R

District: 8th Date of Posting: Jan - 20 - 1972  
 Posted for: \_\_\_\_\_  
 Petitioner: John H. Keil  
 Location of property: E/S York Rd. 100.88' S. of Talbot Ave.  
 Location of Signs: 1 Sign - Cont'd. from York Rd. 100.88' S. of Talbot Ave. - 7  
 Notice No. 2331  
 Remarks: \_\_\_\_\_  
 Posted by: *Michael H. Howe* Date of return: Jan - 27 - 1972

*Official*  
 CERTIFICATE OF POSTING

ZONING DEPARTMENT OF BALTIMORE COUNTY  
 Towson, Maryland

#72-56-R

District: 8th Date of Posting: Aug - 26 - 71  
 Posted for: Agency Met. Sept. 15, 1971 @ 1:00 P.M.  
 Petitioner: John H. Keil  
 Location of property: E/S York Rd. 100.88' S. of Talbot Ave.  
 Location of Signs: 1 Sign - Cont'd. from York Rd. 100.88' S. of Talbot Ave. - 7  
 Remarks: \_\_\_\_\_  
 Posted by: *Michael H. Howe* Date of return: Sept. 2 - 71

TELEPHONE 494-2413 INVOICE No. 84957 DATE: 8/16/71  
 BALTIMORE COUNTY, MARYLAND OFFICE OF FINANCE  
 Revenue Division COUNTY HOUSE TOWSON, MARYLAND 21204  
 TO: Johnson Smith, Esq., 22 W. Pennsylvania Avenue, Towson, Md. 21286  
 RECEIVED August 16, 1971  
 COUNTY CLERK'S OFFICE Bldg., Towson, Md. 21286  
 REPORT TO ACCOUNT NO. 01-442 RETURN THIS PORTION WITH YOUR REMITTANCE TOTAL AMOUNT \$13.00  
 QUANTITY DETACH ALONG PERFORATION AND KEEP THIS PORTION FOR YOUR RECORDS COUNT  
 94.00  
 Cost of advertising and posting property of John H. Keil, et al No. 72-56-R  
 94.00  
 IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYLAND OFFICE OF FINANCE, REVENUE DIVISION MAIL TO COURTHOUSE, TOWSON, MARYLAND 21204

TELEPHONE 494-2413 INVOICE No. 74032 DATE: 9/6/71  
 BALTIMORE COUNTY, MARYLAND OFFICE OF FINANCE  
 Revenue Division COUNTY HOUSE TOWSON, MARYLAND 21204  
 TO: Johnson Smith, Esq., 22 W. Pennsylvania Avenue, Towson, Md. 21286  
 RECEIVED September 6, 1971  
 COUNTY CLERK'S OFFICE Bldg., Towson, Md. 21286  
 REPORT TO ACCOUNT NO. 01-712 RETURN THIS PORTION WITH YOUR REMITTANCE TOTAL AMOUNT \$13.00  
 QUANTITY DETACH ALONG PERFORATION AND KEEP THIS PORTION FOR YOUR RECORDS COUNT  
 13.00  
 Cost of certified documents in Case No. 72-56-R  
 \$13.00  
 E/S York Rd. 100.88' S. of Talbot Ave. 8th District - Central Sector  
 John H. Keil, et ux Petitioner  
 IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYLAND OFFICE OF FINANCE, REVENUE DIVISION MAIL TO COURTHOUSE, TOWSON, MARYLAND 21204

ORIGINAL

OFFICE OF

# THE TOWSON TIMES

TOWSON, MD. 21204 August 30, 1971

THIS IS TO CERTIFY, that the annexed advertisement of  
The Zoning Commission of Baltimore County

was inserted in THE TOWSON TIMES, a weekly newspaper published  
in Baltimore County, Maryland, once a week for One ~~month~~  
week before the 30th day of Aug., 1971 that is to say, the same  
was inserted in the issue of August 26, 1971.

STROMBERG PUBLICATIONS, Inc.

By: *Arthur Morgan*

### PETITION FOR RECLASSIFICATION AND DISTRICT - CENTRAL SECTION

ADDRESS: From D.S. 14 to D.S. 200.  
LOCATION: East side of York Road  
and West South of Talbot Ar-  
tists' Free Workshop, approx-  
imately 1171 to 1199 E.S. 14.  
Public Hearing: 111 W. Chesapeake  
Avenue, Towson, Md.

The Zoning Commission of Baltimore County will hold a public hearing on the above described property on the date of Tuesday, September 14, 1971 at 7:00 P.M. at the Public Hearing Room, 111 W. Chesapeake Avenue, Towson, Md.

All interested parties should appear at the hearing for the purpose of being heard for the same on the date of York Road at the east side of Talbot Avenue and these hearing and hearing on the date of York Road for the date of Monday, August 31, 1971 at 7:00 P.M. at the Public Hearing Room, 111 W. Chesapeake Avenue, Towson, Md.

Interested parties should appear at the hearing for the purpose of being heard for the same on the date of York Road at the east side of Talbot Avenue and these hearing and hearing on the date of York Road for the date of Monday, August 31, 1971 at 7:00 P.M. at the Public Hearing Room, 111 W. Chesapeake Avenue, Towson, Md.

Interested parties should appear at the hearing for the purpose of being heard for the same on the date of York Road at the east side of Talbot Avenue and these hearing and hearing on the date of York Road for the date of Monday, August 31, 1971 at 7:00 P.M. at the Public Hearing Room, 111 W. Chesapeake Avenue, Towson, Md.

Interested parties should appear at the hearing for the purpose of being heard for the same on the date of York Road at the east side of Talbot Avenue and these hearing and hearing on the date of York Road for the date of Monday, August 31, 1971 at 7:00 P.M. at the Public Hearing Room, 111 W. Chesapeake Avenue, Towson, Md.

Interested parties should appear at the hearing for the purpose of being heard for the same on the date of York Road at the east side of Talbot Avenue and these hearing and hearing on the date of York Road for the date of Monday, August 31, 1971 at 7:00 P.M. at the Public Hearing Room, 111 W. Chesapeake Avenue, Towson, Md.

Interested parties should appear at the hearing for the purpose of being heard for the same on the date of York Road at the east side of Talbot Avenue and these hearing and hearing on the date of York Road for the date of Monday, August 31, 1971 at 7:00 P.M. at the Public Hearing Room, 111 W. Chesapeake Avenue, Towson, Md.

Interested parties should appear at the hearing for the purpose of being heard for the same on the date of York Road at the east side of Talbot Avenue and these hearing and hearing on the date of York Road for the date of Monday, August 31, 1971 at 7:00 P.M. at the Public Hearing Room, 111 W. Chesapeake Avenue, Towson, Md.

Interested parties should appear at the hearing for the purpose of being heard for the same on the date of York Road at the east side of Talbot Avenue and these hearing and hearing on the date of York Road for the date of Monday, August 31, 1971 at 7:00 P.M. at the Public Hearing Room, 111 W. Chesapeake Avenue, Towson, Md.

### CERTIFICATE OF PUBLICATION

TOWSON, MD. August 26, 1971

THIS IS TO CERTIFY, that the annexed advertisement was published in THE JEFFERSONIAN, a weekly newspaper printed and published in Towson, Baltimore County, Md. ~~once a week~~  
on 092 days ~~successive weeks~~ before the 15th day of September 1971, the first publication appearing on the 26th day of August 1971.

THE JEFFERSONIAN,

Manager.

Cost of Advertisement, \$ \_\_\_\_\_

### PETITION MAPPING PROGRESS SHEET

FUNCTION	Wall Map		Original		Duplicate		Tracing		200 Sheet	
	date	by	date	by	date	by	date	by	date	by
Descriptions checked and outline plotted on map										
Petition number added to outline										
Denied										
Granted by ZC, BA, CC, CA										
Reviewed by: <i>[Signature]</i>										
Previous case: <i>46-167-R</i>										

Revised Plans: Change in outline or description  Yes  No  
Map # *8-30*

Johnson Bowie, Esq.,  
22 N. Pennock Ave.,  
Towson, Md. 21284

Reclassification  
Zone 15

BALTIMORE COUNTY OFFICE OF PLANNING AND ZONING

County Office Building  
111 W. Chesapeake Avenue  
Towson, Maryland 21204

Your Petition has been received and accepted for filing

this \_\_\_\_\_ day of \_\_\_\_\_

*[Signature]*  
Zoning Commissioner

Petitioners: John M. Hall, et al

Petitioners' Attorney: Johnson Bowie

Reviewed by: *[Signature]*

Chairman of  
Advisory Committee

TELEPHONE  
494-2413

### BALTIMORE COUNTY, MARYLAND OFFICE OF FINANCE

INVOICE  
N<sup>o</sup> 78682

DATE: April 21, 1971

Revenue Division  
COURT HOUSE  
TOWSON, MARYLAND 21204

BY: LEO

Mayor, Dept. of Baltimore County

TO: Johnson Bowie, Esq.,  
22 N. Pennock Ave.,  
Towson, Md. 21284

AMOUNT TO ACCOUNT FOR: 60-022

RETURN THIS PORTION WITH YOUR REMITTANCE

TOTAL AMOUNT  
\$60.00

QUANTITY

DETAILS: ALONG PERFORATION AND KEEP THIS PORTION FOR YOUR RECORDS

COST

Petition for Reclassification for John M. Hall

\$60.00

DUPLICATE

4

IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYLAND  
OFFICE OF FINANCE, REVENUE DIVISION  
MAIL TO  
COURTHOUSE, TOWSON, MARYLAND 21204

BALTIMORE COUNTY, MARYLAND  
OFFICE OF FINANCE - REVENUE DIVISION  
MISCELLANEOUS CASH RECEIPT

N<sup>o</sup> 1491

DATE: 1/17/72 ACCOUNT: 01-662

AMOUNT \$70.00

WHITE - CASHIER DISTRICT/ION THIS AGENCY YELLOW - CUSTOMER

No. 72-46-R - Appeal Costs - John H. Keil, et ux  
E/S York Road 100' S. Talbot Ave.,  
Johnson Bowie, Esq.

7 0000