

IN RE: PETITIONS FOR VARIANCE

W/S Cherwin Avenue, 340' & 290' SW of
Birdwood Avenue
(13108 Cherwin Avenue)
15th Election District
5th Council District

* BEFORE THE
* ZONING COMMISSIONER
* OF BALTIMORE COUNTY
* Cases Nos. 01-020-A & 01-044-A

Karen M. Randlett, Legal Owner;
Allison Martin & Anthony Krasauskis and *
Keith A. Randlett, Contract Purchasers

* * * * *

FINDINGS OF FACT AND CONCLUSIONS OF LAW

These matters came before this Zoning Commissioner at a combined public hearing for consideration of Petitions for Variance filed by the owner of the subject properties, Karen M. Randlett, and the Contract Purchaser, Keith Randlett, seeking relief from Section 1B02.3.C.1 (chart) of the Baltimore County Zoning Regulations (B.C.Z.R.) to permit a lot width of 50 feet in lieu of the minimum required 55 feet in a D.R.5.5 zone, approval of two newly created lots as undersized, pursuant to Section 304 of the B.C.Z.R., and any other variances deemed necessary by the Zoning Commissioner, to permit development of same with two single family dwellings. The subject property and relief requested are more particularly described on the respective site plans submitted with each Petition filed and marked into evidence as Petitioner's Exhibits 1.

Appearing at the requisite public hearing in support of the request were Keith Randlett, Contract Purchaser, and Dwight Little, Professional Engineer with W. Duvall & Associates, Inc., who prepared the site plan for these properties. Also appearing in support of the request were Anthony C. Krasauskis and Allison L. Martin, Contract Purchasers of Lots 5 and 6, and David C. Amaral, Contract Purchaser of Lots 7 and 8. Howard L. Alderman, Jr., Esquire appeared on behalf of the property owner, Karen M. Randlett. Appearing as a Protestant in the matter was John Lang, an adjacent property owner. In addition, numerous letters of opposition were received from impacted neighbors, including Patricia Heustess, Mary H. Kelly, and Mr. & Mrs. James A. Martin.

ORDER RECEIVED FOR FILING

Date

By

The facts of these matters are relatively simple and not in dispute. Testimony and evidence offered revealed that Keith A. Randlett and Karen M. Randlett were husband and wife, and apparently acquired, under Mrs. Randlett's name, the subject property, known as 13108 Cherwin Avenue. Collectively, this property is comprised of four lots, identified as Lots 5, 6, 7 and 8 of Section A of the subdivision known as Twin River Beach, a waterfront community with frontage on Bird River in southeastern Baltimore County. As originally platted, each lot is 25 feet wide by approximately 250 feet deep, and contain a combined area of 25,750 sq.ft., zoned D.R.5.5.

Originally, the property was improved with a single family dwelling. Apparently, the dwelling was roughly centered on the property and the balance of the site was used as yard area. It was indicated at the hearing that the dwelling came into a state of disrepair and rather than repair the house, the Petitioners razed the dwelling. My site inspection of the property subsequent to the hearing showed that there are no improvements on the property, but for some debris.

Apparently, Mr. & Mrs. Randlett are now in the process of obtaining a divorce. As part of their proposed settlement, they have decided to split this property equally between them. Mrs. Randlett will retain Lots 5 and 6 and proposes to sell same to Mr. Krasauskis and Ms. Martin, who propose to develop the property with a single family dwelling. Mr. Randlett will retain Lots 7 and 8 and proposes to sell same to Mr. Amaral who also intends to construct a single family dwelling thereon.

Under Section 1B02.3.C.1 of the B.C.Z.R., all lots in the D.R.5.5 zone must have a minimum width of 55 feet. As a result of the proposed subdivision, the two newly created lots will have insufficient lot width. Thus, variance relief from the minimum lot width requirements is in addition to approval of the two lots as undersized, pursuant to Section 304 of the B.C.Z.R.

Although only Mr. Lang appeared at the hearing in opposition to the request, several letters were received from neighbors who are opposed to the request. Ms. Heustess expressed concern that "...if two homes are allowed to be squeezed on that lot, the value of my home will go down." Ms. Kelly indicated that the lot had been used as a 100-foot wide property for many years

ORDER RECEIVED FOR FILING

Date

By

and that this arrangement should not change. A letter received from Mr. & Mrs. Martin indicates that 50-foot lots are incompatible with the neighborhood.

As noted above, I visited the site subsequent to the hearing. Suffice it to say that the housing stock in this neighborhood is not uniform; that is, there are some large houses on bigger lots as well as several houses on smaller lots.

Consideration as to whether to grant variance relief in these cases must be in accordance with Section 307 of the B.C.Z.R. That Section has been construed by the appellate courts of this state in Cromwell v. Ward, 102 Md. App. 691 (1995). As comprehensively set out in that opinion, variance relief cannot be granted for matters of mere convenience or economic gain. Moreover, variance relief should not be permitted when compliance with the regulation cannot be accomplished as a result of a self-imposed hardship. In this case, it is clear that the Petitioners' aim is only to increase their financial gain. The property has been used as a 100-foot wide lot for years. The subdivision is proposed only so Mr. & Mrs. Randlett can individually realize a profit by the sale of their respective parcels as two 50-foot wide lots. Their request for variance relief is clearly necessary only as a result of their own action.

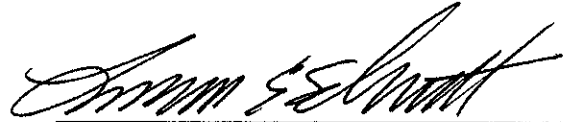
Particularly, based upon the character of the neighborhood, I am not persuaded that relief should be granted in this instance. My site inspection is persuasive to a finding that the granting of the relief would result in two building lots that are inconsistent with the surrounding neighborhood. Generally, although there are indeed some smaller lots in this community, my site inspection was persuasive to a finding that most of the lots are larger and that the request here does not meet the legal test set out in Section 307 of the B.C.Z.R.

Pursuant to the advertisement, posting of the property and public hearing on these Petitions held, and for the reasons set forth herein, the relief requested shall be denied.

THEREFORE, IT IS ORDERED by the Zoning Commissioner for Baltimore County this 19th day of October, 2000 that the Petitions for Variance seeking relief from Section 1B02.3.C.1 (chart) of the Baltimore County Zoning Regulations (B.C.Z.R.) to permit a lot width of 50 feet in lieu of the minimum required 55 feet in a D.R.5.5 zone, approval of two newly created

lots as undersized, pursuant to Section 304 of the B.C.Z.R., and any other variances deemed necessary by the Zoning Commissioner to permit a subdivision of the subject property to create two building lots, in accordance with Petitioners' Exhibits 1, be and is hereby DENIED.

IT IS FURTHER ORDERED that the Petitioners shall have thirty (30) days from the date of this Order to file an appeal of this decision.



LAWRENCE E. SCHMIDT
Zoning Commissioner
for Baltimore County

LES:bjs

ORDER RECEIVED FOR FILING
Date 10/19/10
By [Signature]



**Baltimore County
Zoning Commissioner**

October 19, 2000

Suite 405, County Courts Bldg.
401 Bosley Avenue
Towson, Maryland 21204
410-887-4386
Fax: 410-887-3468

Howard L. Alderman, Jr., Esquire
Levin & Gann
502 Washington Avenue, Suite 800
Towson, Maryland 21204

RE: PETITIONS FOR SPECIAL EXCEPTION & VARIANCE
W/S Cherwin Avenue, 340' & 290' SW of Birdwood Avenue
(13108 Cherwin Avenue)
15th Election District – 5th Council District
Karen M. Randlett - Petitioner
Cases Nos. 01-020-A & 01-044-A

Dear Mr. Alderman:

Enclosed please find a copy of the decision rendered in the above-captioned matter. The Petitions for Variance have been denied, in accordance with the attached Order.

In the event any party finds the decision rendered is unfavorable, any party may file an appeal to the County Board of Appeals within thirty (30) days of the date of this Order. For further information on filing an appeal, please contact the Department of Permits and Development Management office at 887-3391.

Very truly yours,

LAWRENCE E. SCHMIDT
Zoning Commissioner
for Baltimore County

LES:bjs

cc: Ms. Karen Randlett, 50 Olde Forge Lane, Baltimore, Md. 21236
Mr. Keith Randlett, 8944 Quail Run Drive, Perry Hall, Md. 21128
Mr. Anthony Krasauskis & Ms. Allison Martin, 1107 Benjamin Road, Belair, Md. 21014
Mr. David C. Amaral, 9306 Sheridan Street, Lanham, Md. 20706
Mr. Dwight Little, W. Duvall & Assoc., 530 E. Joppa Road, Towson, Md. 21286
Chesapeake Bay Critical Areas Commission
45 Calvert Street, 2nd Floor, Annapolis, Md. 21401
Ms. Mary Huneke Kelly, 13112 Cherwin Avenue, Baltimore, Md. 21220
Ms. Patricia Heustess, 13111 Cherwin Avenue, Baltimore, Md. 21220
Mr. & Mrs. James A. Martin, 13106 Cherwin Avenue, Baltimore, Md. 21220
Code Enforcement Division, PDM; DEPRM; People's Counsel; Case File





Petition for Variance

to the Zoning Commissioner of Baltimore County

for the property located at 13108 CHERWIN AVENUE

which is presently zoned DR S.5

This Petition shall be filed with the Department of Permits and Development Management. The undersigned, legal owner(s) 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 for a Variance from Section(s) 1 B02.3C1 (CHART) to permit

A LOT WIDTH OF 50 FT. IN LIEU OF THE REQUIRED 55 FT. IN A DR. S.5 ZONE

AND to approve an undersized lot per Section 304 and to approve any other variances deemed necessary by the zoning commissioner. of the Zoning Regulations of Baltimore County, to the zoning law of Baltimore County, for the following reasons: (indicate hardship or practical difficulty) DUE TO THE LOT WIDTH, THE HOUSE WILL NOT FIT WITHOUT THE VARIANCE

Property is to be posted and advertised as prescribed by the zoning regulations.

I, or we, agree to pay expenses of above Variance, advertising, posting, etc. and further agree to and are to be bounded by the zoning regulations and restrictions of Baltimore County adopted pursuant to the zoning law for Baltimore County.

I/We do solemnly declare and affirm, under the penalties of perjury, that I/we are the legal owner(s) of the property which is the subject of this Petition.

Contract Purchaser/Lessee:

Allison Martin Anthony Krasauskis
Name - Type or Print

Allison Martin Anthony Krasauskis
Signature

1107 Benjamin Rd. 410.
Address

Belair Md. 21014
City State Zip Code

Attorney For Petitioner:

Name - Type or Print

Signature

Company

Address

Telephone No.

State

Zip Code

Legal Owner(s):

Karen Marie Randlett
Name - Type or Print

Karen Marie Randlett
Signature

Name - Type or Print

Signature

50 Olde Forge Lane 410-215-6741
Address Telephone No.

Baltimore Md. 21236
City State Zip Code

Representative to be Contacted:

Name

Address

Telephone No.

City

State

Zip Code

OFFICE USE ONLY

ESTIMATED LENGTH OF HEARING _____

UNAVAILABLE FOR HEARING

Reviewed By TAG Date 7-14-00

ORDER RECEIVED FOR FILING
Date 7/14/00
BY [Signature]
9/15/98

Case No. 01-020-A

W. DUVALL & ASSOCIATES, INC.

Engineers • Surveyors • Land Planners



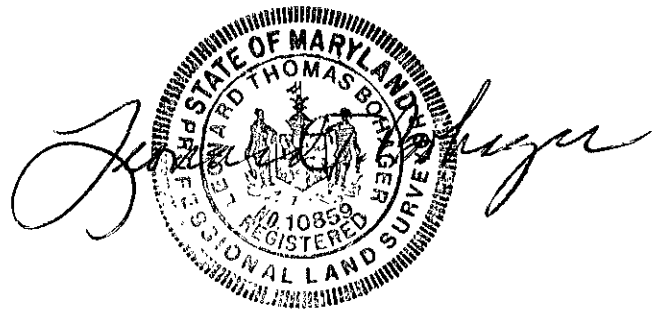
530 East Joppa Road
Towson, Maryland 21286

Telephone: (410) 583-9571
Fax: (410) 583-1513

June 22, 2000

ZONING DESCRIPTION FOR LOTS 5 & 6 SECTION A, TWIN RIVER BEACH CHERWIN AVENUE

Beginning at a point on the west side of Cherwin Avenue which is 40 feet wide at the distance of 340 feet southwesterly of the intersection of the nearest improved intersecting street, Birdwood Avenue, which 30 feet wide. Being Lots 5 and 6, Section A, in the subdivision of Twin River Beach as recorded in Baltimore County Plat Book L.McL.M. 9 folio 33, containing 12,850 square feet of land, more or less. Also known as part of 13108 Cherwin Avenue and located in the 15th Election District.



01-0201A

BALTIMORE COUNTY, MARYLAND
OFFICE OF BUDGET & FINANCE
MISCELLANEOUS RECEIPT

No. 083542

DATE 7-14-00 ACCOUNT K001 6150

AMOUNT \$ 50.00

RECEIVED FROM: Karen R. Ulett

FOR: Variance 01-020A

DISTRIBUTION
WHITE - CASHIER

PINK - AGENCY

YELLOW - CUSTOMER

PAID RECEIPT
PAYMENT ACCOUNT TIME
7/14/2000 7/14/2000 14:40:12
ISSUED BY: CASHIER VSIE HER DMM/LS
RECEIPT # 00000000000000000000
OR NO. 083542
Receipt Tot 50.00
50.00 OK
Baltimore County Maryland

CASHIER'S VALIDATION

CERTIFICATE OF POSTING

**RE: CASE # 01-020-A
PETITIONER/DEVELOPER
(Anthony Krasdauskis)
DATE OF Hearing
(9-5-00)**

**BALTIMORE COUNTY DEPARTMENT OF
PERMITS AND DEVELOPMENT MANAGEMENT
COUNTY OFFICE BUILDING, ROOM 111
111 WEST CHESAPEAKE AVE.
TOWSON, MARYLAND 21204**

ATTENTION : MS. GWENDOLYN STEPHENS

LADIES AND GENTLEMEN:

**THIS LETTER IS TO CERTIFY UNDER THE PENALTIES OF PERJURY THAT THE NECESSARY
SIGNS(S) REQUIRED BY LAW WERE POSTED CONSPICUOUSLY ON THE PROPERTY LOCATED AT**

13108 Cherwin Ave. Baltimore , Maryland 21220_____

THE SIGN(S) WERE POSTED ON _____ 8-21-00 _____
(MONTH, DAY, YEAR)

SINCERELY,


(SIGNATURE OF SIGN POSTER & DATE)

_____**THOMAS P. OGLE SR.**_____

_____**325 NICHOLSON ROAD**_____

_____**BALTIMORE, MARYLAND 21221**_____

_____**410-687-8405**_____

(TELEPHONE NUMBER)

NOTICE OF ZONING HEARING

The Zoning Commissioner of Baltimore County, by authority of the Zoning Act and Regulations of Baltimore County will hold a public hearing in Towson, Maryland on the property identified herein as follows:

Case: 2011-020-A

13108 Cherwin Avenue

W/S Cherwin Avenue, 340' SW of Birdwood Avenue

15th Election District

5th Councilmanic District

Legal Owner(s): Karen Marie Randlett

Contract Purchaser: Allison Martin & Anthony

Krasdauskis

Variance: to permit a lot width of 50 feet in lieu of the required 55 feet and to approve an undersized lot and any other variances deemed necessary by the zoning commissioner.

Hearing: Tuesday, September 5, 2000 at 11:00 a.m. in Room 407, County Courts Building, 401 Busley Avenue.

LAWRENCE E. SCHMIDT

Zoning Commissioner for

Baltimore County

NOTES: (1) Hearings are Handicapped Accessible; for special accommodations Please Contact the Zoning Commissioner's Office at (410) 887-4386.

(2) For information concerning the File and/or Hearing, Contact the Zoning Review Office at (410) 887-3391.

8/19/97 August 17

C412014

CERTIFICATE OF PUBLICATION

TOWSON, MD, 8/18/, 2000

THIS IS TO CERTIFY, that the annexed advertisement was published in THE JEFFERSONIAN, a weekly newspaper published in Towson, Baltimore County, Md., once in each of 1 successive weeks, the first publication appearing on 8/17/, 2000.

J. Wilkinson
THE JEFFERSONIAN,

LEGAL ADVERTISING

RE: PETITION FOR VARIANCE
13108 Cherwin Avenue, W/S Cherwin Ave,
340' SW of Birdwood Ave
15th Election District, 5th Councilmanic

Legal Owner: Karen M. Randlett
Contract Purchasers: Allison Martin and
Anthony Krasauskis
Petitioner(s)

* BEFORE THE
* ZONING COMMISSIONER
* FOR
* BALTIMORE COUNTY
* Case No. 01-20-A

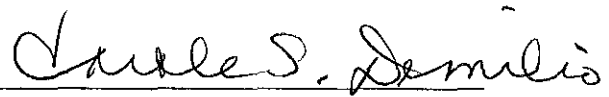
* * * * *

ENTRY OF APPEARANCE

Please enter the appearance of the People's Counsel in the above-captioned matter. Notice should be sent of any hearing dates or other proceedings in this matter and of the passage of any preliminary or final Order.

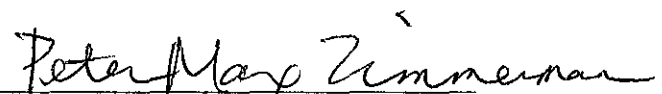
All parties should copy People's Counsel on all correspondence sent/ documentation filed in the case.

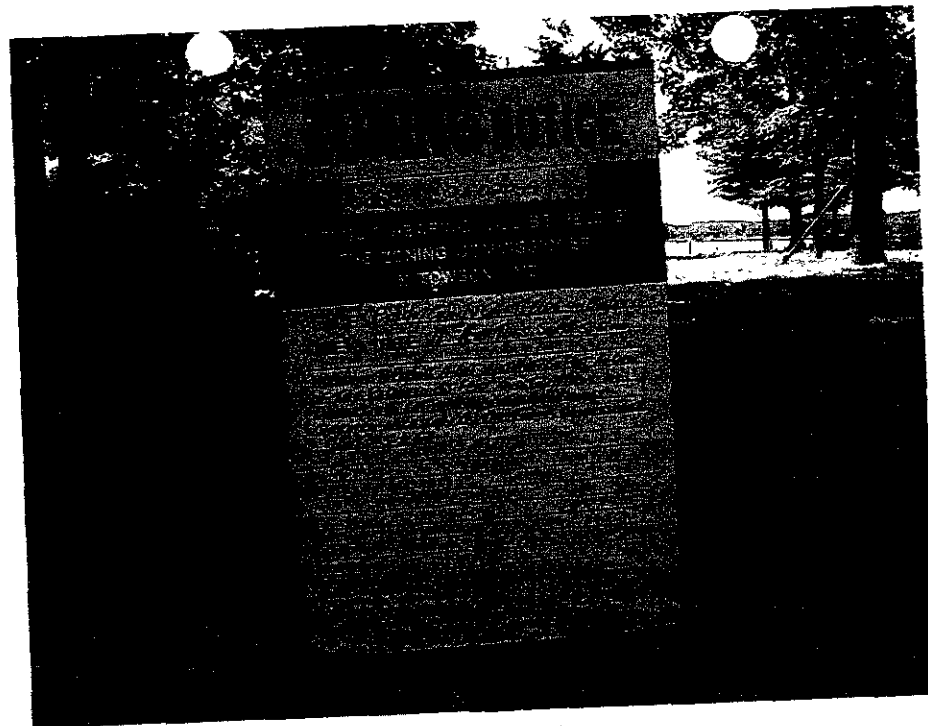

PETER MAX ZIMMERMAN
People's Counsel for Baltimore County


CAROLE S. DEMILIO
Deputy People's Counsel
Old Courthouse, Room 47
400 Washington Avenue
Towson, MD 21204
(410) 887-2188

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 31st day of July, 2000 a copy of the foregoing Entry of Appearance was mailed to Legal Owner Karen M. Randlett, 50 Olde Forge Lane, Baltimore, MD 21236, and to Contract Purchasers Allison Martin & Anthony Krasauskis, 1107 Benjamin Road, Belair, MD 21014, Petitioners.


PETER MAX ZIMMERMAN



13108 Cherwin Ave.



Baltimore County
Department of Permits and
Development Management

Director's Office
County Office Building
111 West Chesapeake Avenue
Towson, Maryland 21204
410-887-3353
Fax: 410-887-5708

August 3, 2000

NOTICE OF ZONING HEARING

The Zoning Commissioner of Baltimore County, by authority of the Zoning Act and Regulations of Baltimore County, will hold a public hearing in Towson, Maryland on the property identified herein as follows:

CASE NUMBER: 01-020-A

13108 Cherwin Avenue

W/S Cherwin Avenue, 340' SW of Birdwood Avenue

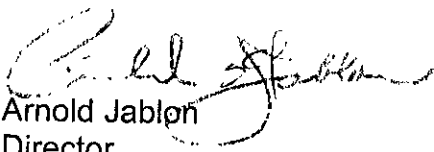
15th Election District – 5th Councilmanic District

Legal Owner: Karen Marie Randlett

Contract Purchaser: Allison Martin & Anthony Krasdauskis

Variance to permit a lot width of 50 feet in lieu of the required 55 feet and to approve an undersized lot and any other variances deemed necessary by the zoning commissioner.

HEARING: Tuesday, September 5, 2000 at 11:00 a.m. in Room 407, County Courts Building, 401 Bosley Avenue


Arnold Jablon
Director

C: Karen Randlett, 50 Olde Forge Lane, Baltimore 21236
Allison Martin & Anthony Krasauskis, 1107 Benjamin Road, BelAir 21014

- NOTES: (1) **THE PETITIONER MUST HAVE THE ZONING NOTICE SIGN POSTED BY AN APPROVED POSTER ON THE PROPERTY BY AUGUST 21, 2000.**
- (2) HEARINGS ARE HANDICAPPED ACCESSIBLE; FOR SPECIAL ACCOMMODATIONS PLEASE CALL THE ZONING COMMISSIONER'S OFFICE AT 410-887-4386.
- (3) FOR INFORMATION CONCERNING THE FILE AND/OR HEARING, CONTACT THE ZONING REVIEW OFFICE AT 410-887-3391.



**DEPARTMENT OF PERMITS AND DEVELOPMENT MANAGEMENT
ZONING REVIEW**

ADVERTISING REQUIREMENTS AND PROCEDURES FOR ZONING HEARINGS

The Baltimore County Zoning Regulations (BCZR) require that notice be given to the general public/neighboring property owners relative to property which is the subject of an upcoming zoning hearing. For those petitions which require a public hearing, this notice is accomplished by posting a sign on the property (responsibility of the petitioner) and placement of a notice in a newspaper of general circulation in the County, both at least fifteen (15) days before the hearing.

Zoning Review will ensure that the legal requirements for advertising are satisfied. However, the petitioner is responsible for the costs associated with these requirements. The newspaper will bill the person listed below for the advertising. This advertising is due upon receipt and should be remitted directly to the newspaper.

OPINIONS MAY NOT BE ISSUED UNTIL ALL ADVERTISING COSTS ARE PAID.

For Newspaper Advertising:

Item Number or Case Number: 01-020A

Petitioner: ALLISON MARTIN & ANTHONY KRASIAUSKIS

Address or Location: 13108 CHERWIN AVE

PLEASE FORWARD ADVERTISING BILL TO:

Name: KEITH RANOLETT
c/o RE MAX REALTY

Address: 7939 HONEYGO BLVD #127
BALD MD 21236

Telephone Number: 410 931-9200



Baltimore County
Department of Permits and
Development Management

Development Processing
County Office Building
111 West Chesapeake Avenue
Towson, Maryland 21204

August 29, 2000

Ms. Karen Randlett
50 Olde Forge Lane
Baltimore, MD 21236

Dear Ms. Randlett:

RE: Case Number: 01-020-A & 01-044-A, 13108 Cherwin Avenue

The above referenced petition was accepted for processing by the Bureau of Zoning Review, Department of Permits and Development Management (PDM) on July 14, 2000.

The Zoning Advisory Committee (ZAC), which consists of representatives from several approval agencies, has reviewed the plans that were submitted with your petition. All comments submitted thus far from the members of the ZAC are attached. These comments are not intended to indicate the appropriateness of the zoning action requested, but to ensure that all parties (zoning commissioner, attorney, petitioner, etc.) are made aware of plans or problems with regard to the proposed improvements that may have a bearing on this case. All comments will be placed in the permanent case file.

If you need further information or have any questions, please do not hesitate to contact the commenting agency.

Very truly yours,

W. Carl Richards, Jr.

W. Carl Richards, Jr. GDZ
Supervisor, Zoning Review

WCR: gdz

Enclosures

C: Keith Randlett, Remax Realty, 7939 Honeygo Blvd., Baltimore 21236
W. Duvall & Assoc., Inc., c/o Chuck Merritt, 530 E. Joppa Rd., Towson 21286
People's Counsel



BALTIMORE COUNTY, MARYLAND

INTEROFFICE CORRESPONDENCE

TO: Arnold Jablon, Director
Department of Permits & Development Mgmt.

DATE: August 29, 2000

FROM:  Robert W. Bowling, Supervisor
Bureau of Development Plans Review

SUBJECT: Zoning Advisory Committee Meeting
For July 31, 2000
Item Nos. 006, 008, 009, 010, 011, 012,
013, 014, 015, 016, 017, 018, 019, and
020

The Bureau of Development Plans Review has reviewed the subject zoning items, and we have no comments.

RWB:HJO:jrb

cc: File



Baltimore County
Fire Department

Office of the Fire Marshal
700 East Joppa Road
Towson, Maryland 21286-5500
410-887-4880

July 31, 2000

Department of Permits and
Development Management (PDM)
County Office Building, Room 111
Mail Stop #1105
111 West Chesapeake Avenue
Towson, Maryland 21204

ATTENTION: Gwen Stephens

RE: Property Owner: SEE BELOW

Location: DISTRIBUTION MEETING OF July 24, 2000

Item No.: See Below

Dear Ms. Stephens:

Pursuant to your request, the referenced property has been surveyed by this Bureau and the comments below are applicable and required to be corrected or incorporated into the final plans for the property.

8. The Fire Marshal's Office has no comments at this time,
IN REFERENCE TO THE FOLLOWING ITEM NUMBERS:

008, 009, 011, 012, 013, 018, 019, 017, and 020

REVIEWER: LIEUTENANT HERB TAYLOR, Fire Marshal's Office
PHONE 887-4881, MS-1102F

cc: File



BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: Arnold Jablon, Director
Department of Permits and
Development Management

DATE: July 31, 2000

FROM: Arnold F. 'Pat' Keller, III
Director, Office of Planning

SUBJECT: 13108 Cherwin Avenue

JUL 31

INFORMATION:

Item Number:

01-020
01-021

Petitioner: Allison Martin Anthony Krasauskis

Zoning: DR 5.5

Requested Action: Variance

SUMMARY OF RECOMMENDATIONS:

The Office of Planning supports the request to permit a lot width of 50 feet in lieu of the required 55 in a DR 5.5 zone and to approve an undersize lot per Section 304 of the County Zoning Regulation.

Prepared by:



Section Chief:

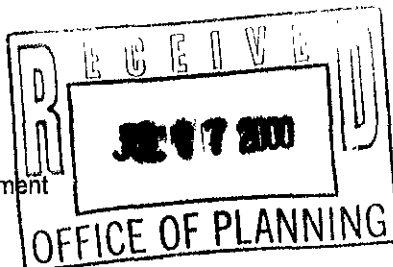


AFK:MAC:

INTER-OFFICE CORRESPONDENCE
RECOMMENDATION FORM

TO: Director, Office of Planning & Community Conservation
Attention: Jeffrey Long
County Courts Building, Room 406
401 Bosley Avenue
Towson, MD 21204

Permit or Case No. 01-020A



FROM: Arnold Jablon, Director
Department of Permits & Development Management

RE: Undersized Lots

Residential Processing Fee Paid
(\$50.00)

Accepted by TAG
Date 7-14-00

Pursuant to Section 304.2 (Baltimore County Zoning Regulations) effective June 25, 1992, this office is requesting recommendations and comments from the Office of Planning and Community Conservation prior to this office's approval of a dwelling permit.

MINIMUM APPLICANT SUPPLIED INFORMATION:

KAREN RANDUETT 50 OLDE FORGE LA. 410 215-6741
Print Name of Applicant Address Telephone Number

Lot Address 13108 CHERWIN AVE Election District 15 Councilmanic District 5 Square Feet 13000

Lot Location: N E S W side/corner of CHERWIN AVE, 340 feet from N E W corner of BIRWOOD AVE
(street) (street)

Land Owner: KAREN RANDUETT Tax Account Number _____

Address: 50 OLDE FORGE LA. 21236 Telephone Number 410 215-6741

CHECKLIST OF MATERIALS- (to be submitted for design review by the Office of Planning and Community Conservation)

TO BE FILLED IN BY ZONING REVIEW, DEPARTMENT OF PERMITS AND DEVELOPMENT MANAGEMENT ONLY!
PROVIDED?

	YES	NO
1. This Recommendation Form (3 copies)	☒	☐
2. Permit Application	☒	☒
3. Site Plan	☒	☐
Property (3 copies)	☒	☐
Topo Map (2 copies): available in Room 206, County Office Building - (please label site clearly)	☒	☐
4. Building Elevation Drawings	☒	☐
5. Photographs (please label all photos clearly)	☒	☐
Adjoining Buildings	☒	☐
Surrounding Neighborhood	☐	☐
6. Current Zoning Classification: <u>DR S.5</u>		

TO BE FILLED IN BY THE OFFICE OF PLANNING ONLY!

RECOMMENDATIONS / COMMENTS:

☒ Approval ☐ Disapproval ☐ Approval conditioned on required modifications of the application to conform with the following recommendations.

Signed by: Jeffrey Long
for the Director, Office of Planning and Community Conservation

Date: 7/21/00

SCHEDULED DATES CERTIFICATE OF FILING AND POSTING FOR A BUILDING PERMIT APPLICATION PURSUANT TO SECTION 304.2

Department of Permits and Development Management (PDM)
County Office Building
111 West Chesapeake Avenue
Towson, Maryland 21204

The application for your proposed Building Permit application has been reviewed and is accepted for filing by _____ on _____
(name of planner) Date (A)

A sign indicating the proposed building must be posted on the property for fifteen (15) days before a decision can be rendered. The cost of filing is \$50.00. This fee is subject to change. Confirm all current fees prior to filing the application.

In the absence of a request for public hearing during the 15-day posting period, a decision can be expected within approximately four weeks. However, if a valid demand is received by the closing date, then the decision shall only be rendered after the required public special hearing.

*SUGGESTED POSTING DATE _____ D (15 Days Before C)

DATE POSTED _____

HEARING REQUESTED? YES _____ NO _____ - DATE _____

CLOSING DAY (LAST DAY FOR HEARING DEMAND) _____ C (B-3 Work Days)

TENTATIVE DECISION DATE _____ B (A + 30 Days)

*Usually within 15 days of filing

CERTIFICATE OF POSTING

District: _____

Location of Property: _____

Posted by: _____ Date of Posting: _____
Signature

Number of Signs: _____

W. DUVALL & ASSOCIATES, INC.

Engineers • Surveyors • Land Planners



530 East Joppa Road
Towson, Maryland 21286

email: wduvall@erols.com

Telephone: (410) 583-9571
Fax: (410) 583-1513

August 16, 2000

Baltimore County, Maryland
Zoning Office
111 W. Chesapeake Avenue
Towson, Maryland 21204

Attention: Mr. George Zahner

Re: 13108 Cherwin Avenue
PN 98135A

Dear Mr. Zahner:

We are requesting your approval to combine the Zoning Hearings scheduled for the above referenced project. We filed two Variances for Approval of two undersized lots. The Hearing dates are September 5, 2000 for Case #-01-020A, and September 8, 2000 for Case #01-044A.

We would request combining the two cases in order to accommodate our Client. Also, the mentioned cases should not require additional time from the Hearing Officer.

Thank you for your consideration of the above. Please contact me if you have any questions.

Very truly,
W. DUVALL & ASSOCIATES, INC.

Chuck MERRITT

Chuck E. Merritt
Designer

CEM/bfc



Baltimore County
Department of Permits and
Development Management

Director's Office
County Office Building
111 West Chesapeake Avenue
Towson, Maryland 21204
410-887-3353
Fax: 410-887-5708

August 15, 2000

Ms. Karen Randlett
50 Olde Forge Lane
Baltimore, MD 21236

Dear Ms. Randlett:

RE: Case Number 01-044-A, 13108 Cherwin Avenue

The above matter, previously assigned to be heard on Friday, September 8, 2000 at 11:00 a.m. has been **rescheduled for Tuesday, September 5, 2000 at 11:00 a.m.** with Case Number 01-020-A.

As the person requesting the postponement, you are now responsible for affixing the new hearing date and time to the hearing notice sign posted on the property as soon as possible. The petitioner or his/her agent may not personally post or change a zoning sign. One of the currently approved vendors/posters must be contacted to do so.

If you need further information or have any questions, please do not hesitate to contact George Zahner at 410-887-3391.

Very truly yours,

Arnold Jablon
Director

AJ:

C: Keith Randlett, Remax Realty, 7939 Honeygo Boulevard, Baltimore 21236
W. Duvall & Assoc., Inc., c/o Chuck Merritt, 530 E. Joppa Road, Towson 21286



Sept 5 & Sept 8

01 20-A
Chuck 01 44-17

murphy

410 583 9571

GZ 8-14

13106 Cherwin Ave
Baltimore, MD 21220

SEP 11 1997

Sirs:

In regards to the request for a zoning variance for the lots listed as 13108 and 13110 Cherwin Ave, Baltimore County, 21220, held on September 5, 2000, hearings 01-020-A and 01-044-A: We **oppose** allowing any variance.

Our property adjoins the lot in question on the south side. Our lot has 100' across the road, 250' deep. We pass the lot in getting to our drive as our portion of Cherwin Ave is a dead end street ending in a wetland area.

When we moved to the neighborhood there was a single house on a 100' lot adjoining ours to the north. In looking for our home we went through the house at 13108 Cherwin and found it to be an old fashioned (age of about 70 years we were told by the family of the owner) house in both style and solid construction, though not suited to our needs. The lot had many tall trees as did our lot and the lot to the north. The quiet wooded neighborhood was one factor in our decision to buy 13106 Cherwin.

Mr Randlett bought the property in 1998 and cut down five mature trees in late 1998 then tore the house down in 1999.

The neighborhood is composed of single-family homes on 75' or 100' wide lots and 250' from street to water. None are smaller and none needed a variance to be there. This was the way we found the neighborhood and this is the way Mr Randlett found the neighborhood. County officials with study set 55' as the minimum width for a lot in this area and there is no reason to overturn their decision.

Changing the single lot to two 50' lots will change the nature of the neighborhood to the detriment of those who live there now. Cherwin Ave is a narrow street and adding four cars (2 per house) onto the narrow lot will make traffic difficult for those of us beyond the lot and dangerous for emergency and service vehicles. The waterside will be equally congested with putting additional docks, as our area is a concave shallow cove.

Keeping the lot as it was originally built upon and as it was sold to Mr Randlett will be consistent with the neighborhood. Changing to two 50' lots will change the nature of the neighborhood for the financial gain to one person, who will not be living there, and financial loss to many who do. He bought the house and lot knowing as it was and now wants the rules changed for his gain. This is not fair to the local residents and should not be allowed.

Sincerely,

James A Martin
Jeanie B Martin

James A Martin *Jeanie Martin*

13106 Cherwin Ave
Baltimore, MD 21220
25 August 2000

8/31/00

wcd

for file

To: ~~George~~ Pienne
Capt + one
in each call

8/1/00 wcd

Mr Arnold Jablon
Director of Permits & Development Management
111 W Chesapeake Ave Rm 111
Towson, MD 21204

Dear Mr Jablon:

I ask that the following letter be included in the case as I will be unable to attend the hearing but have an interest in the case and the outcome will directly effect my home and the neighborhood in which I and my family live.

To the matter of the Zoning Variance for case 01-020-A and 01-044-A for Cherwin Ave in Baltimore county set for Tuesday September 5 at 11:00am to reduce the size of the lot for a home reduced from 55 feet to 50 feet.

I strenuously object to the variance.

The two lots in question adjoin my property to the north and will have a detrimental effect on my property and the general neighborhood.

The lots have been one unit for one single home were bought as one unit in 1998. The owner tore the single home down for the stated purpose of building a single home for himself in 1999.

Since purchasing the lot the owner has continuously disrupted the neighborhood by cutting trees, without permit, leaving the house half tore down for a year, and leaving the lot in disarray to the point that the county environmental office has been brought in to force him to keep the lot safe. Now he is asking that the neighborhood be further disrupted for his financial profit. He knew the size of lots when he purchased the unit and had he stayed with his original intention there would be no need for this action.

The size of lot fits with other homes beside and across from these lots, which are all in the 100' size in width and the homes fit within that size. Allowing two narrow lots will force a buyer to place narrow homes with little land between each other and between them and our homes. Existing homes have adequate land for walkways and shrubs surrounding each house.

From other homes built in the area on narrow lots the types of homes have been lower costs, as there is little room for proper landscaping. Two homes will force the removal of additional trees and shrubs reducing the pastoral character of the neighborhood.

01-020-A

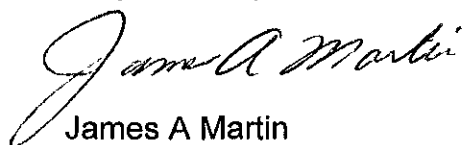
The property was intended for use as one unit as there is a single dock and boat ramp. Separation of the unit into two lots puts the ramp in one lot, the dock in the other. For future owners to maximize the water access of the property an additional dock and ramp will be needed and this will cause overcrowding on the waterside for all of us.

The lots sit near the end of Cherwin Ave. It is a narrow dead end street that barely accommodates those of us who live there. Doubling the number of homes and thereby cars will cause unnecessary traffic congestion to those of us who live beyond the lots in question.

Leaving the lots in the present size will not put the owner in a financial dilemma as he can, if he does not choose to build for himself, sell the lot as he bought it, as one unit for a nice price as it is a wooded waterfront lot. From other lots sold in the area he will be able to sell for more than he paid for it, though he has made additional expenses caused by his own mismanagement of the property.

Basically, having two narrow homes will be out of character with the rest of the neighborhood and will have a drastic negative change to the neighborhood.

Very sincerely,



James A Martin
Jeanie B Martin



01-020-A

WEST TWIN RIVER BEACH COMMUNITY ASSOCIATION

October 17, 2000

Mr Larry Schmidt
Zoning Commissioner
Baltimore, County
County Court Building
Towson, MD 21204

19

Dear Mr. Schmidt:

A hearing was initially held on September 5, 2000 for a variance of the property at 13108/13110 Cherwin Ave. Initially several neighbors expressed against the variance request by personal visit and by letter. As no decision has been issued the community association also asks that the variance be denied.

We are a community in transition. The community was originally founded in the early part of the 20th century as weekend vacation homes, many little more than four room shacks. They were fine for that time. But as availability to Baltimore became easier houses were resold to people looking to make the community their permanent homes. Hookups to public water and electricity increased the permanence of the homes and families so that today very few homes are owned by people who do not make this community their primary residence.

With this move to permanence the quality of homes increased and new owners looked for property of sufficient size for raising a family. In more than one instance two weekend size lots have been joined to make a permanent home property.

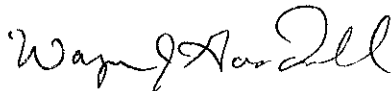
All along the county has had a minimum width regulation for a single home and we have all built within that limitation.

Now the request for a variance on the property in question goes against the direction the community is trying to move. We of the West Twin River beach Association strongly oppose this variance.

We are not against a home being rebuilt on this property and we look forward to a single new family moving into the community. But we do not want two families on two narrow slips in the middle of larger lots of families who had built according to the country regulations.

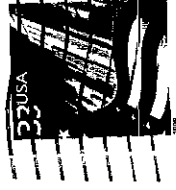
Allowing this variance will go against the positive growth of our community.

Sincerely,



Wayne Goodwill
President

Mr Larry Schmidt
Zonning Commissioner
Baltimore County
County Court Building
Towson, MD
21204



21204/4324

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

Dear Sirs,

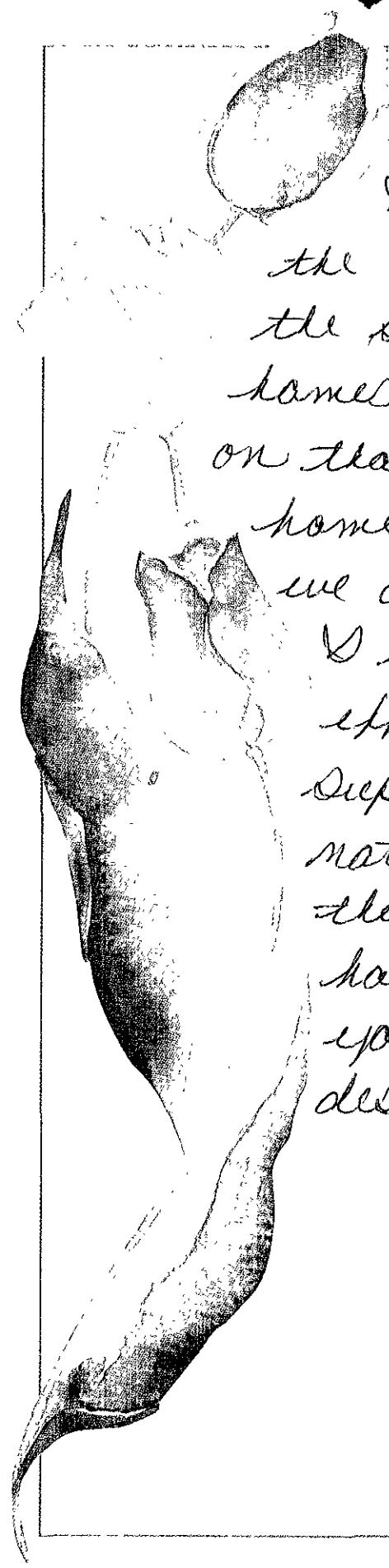
The property at 13105 Cherwin Avenue is 100 ft waterfront by approximately 260 ft deep.

This is waterfront property in the flood plain. It has been 100 ft waterfront since the 1930's.

I oppose splitting this property into two (2) parcels. It should remain 100 ft waterfront with only one house in the center as it has always been.

I am the daughter of the original owners and live next door at 13112 Cherwin.

Mary Huneke Kelly
9-5-2000



Dear Sirs,

I wrote this letter to protect the variance on zoning across the street from me. If two homes are allowed to be squeezed on that lot, the value of my own home will go down. In addition, we are so near the water that I worry about long term effects. I thought we are supposed to conserve our natural resources & protect them. If you allow two homes to go up over there you are promoting the destruction of our resources.

Patricia Henotese
13111 Cherrin Avenue
Baltimore, MD 21220
410-335-4833

PLEASE PRINT CLEARLY

CITIZEN SIGN-IN SHEET

NAME

ADDRESS

John Lang

13112 Cherrin Ave.



PETITIONER(S) SIGN-IN SHEET

ADDRESS

W. Duvall & Assoc.
530 E. Joppa Rd. Towson 21286
8944 Quail Run Drive
Gaith. Md. 21128

Levin & Gann PA 502 Washington Ave
Suite 809

NEW ADDRESS

Anthony C. Krasauski's
Allison L. Martin
David C. Amaral

Levin & Gann PA 502 Washington Ave
Savannah, GA

Jensen 21204

601 Church Street
Baltimore, MD 21225

1107 Benjamin Rd
Bel Air, MD 21014

9306 Sheridan St.
Lanham, MD 20706



Printed with Soybean Ink
on Recycled Paper

File Updates

Case/Date	Address	Comments
8/30/00		
00-5823	13108 Cherwin Ave, Belts, MD 21737	
		Zoned: DR 5.5
		Reinspection showed this property (4 lots) is set for Zoning hearings in Sept, 2000.
		Zoning Hearing Case # 01-044A
		and Case # 01-020A.
		This property is currently in violation of the zoning regulations, and the owner is being charged with an "open dump."
		As part of the problem involves a home heating oil tank, and as I observed oil on the water in ponding water adjacent to the tank, this property has also been referred to D.E.P.R.M. for investigation.
		R. Mansfield
		CC to: Tim Kotroco, Deputy Zoning Commissioner
		<u>M.S. 3401</u>
		SEP-6

99-1805
3329

[Handwritten notes:]

This one
File #
Tim Katsos
reg. 1. C...
~~ME-SUB-3401~~
REPAIR.



Baltimore County
Department of Permits and
Development Management

Code Inspections and Enforcement
County Office Building
111 West Chesapeake Avenue
Towson, MD 21204

Code Enforcement: 410-887-3351
Building Inspection: 410-887-3953

Plumbing Inspection: 410-887-3620
Electrical Inspection: 410-887-3960

BALTIMORE COUNTY UNIFORM CODE ENFORCEMENT CORRECTION NOTICE

Citation/Case No. 00-5823	Property No. 15-08-800300	Zoning:
-------------------------------------	-------------------------------------	---------

Name(s): **KAREN M RANDETT**

Address: **13108 CHERWIN AVE BALTIMORE 21220**

Violation Location:

DID UNLAWFULLY VIOLATE THE FOLLOWING BALTIMORE COUNTY LAWS:

101; 102.1, 1801.1A
CEASE OUT SIDE STORAGE OF
UN USED OIL TANK. REMOVE TANK
FROM PROPERTY

YOU ARE HEREBY ORDERED TO CORRECT THESE VIOLATION(S) ON OR BEFORE:

On or Before: 8-29-00	Date Issued: 7-31-00
---------------------------------	--------------------------------

FAILURE TO COMPLY WITH THE DEADLINE STATED IS A MISDEMEANOR. A CONVICTION FOR EACH VIOLATION SUBJECTS YOU TO POTENTIAL FINES OF \$200, \$500, OR \$1000 PER DAY, PER VIOLATION, DEPENDING ON VIOLATION, OR 90 DAYS IN JAIL, OR BOTH.

Print Name

INSPECTOR: **M STUART Kelly**

STOP WORK NOTICE

PURSUANT TO INSPECTION OF THE FOREGOING VIOLATIONS, YOU SHALL CEASE ALL WORK UNTIL THE VIOLATIONS ARE CORRECTED AND/OR PROPER PERMITS OBTAINED. WORK CAN RESUME WITH THE APPROVAL OF THE DIVISION OF CODE INSPECTIONS AND ENFORCEMENT. THESE CONDITIONS MUST BE CORRECTED NOT LATER THAN:

Not Later Than:	Date Issued:
-----------------	--------------

INSPECTOR: _____

AGENCY

Code Enforcement - Daily Worksheet

Inspector - RLM

Area Case # Location Apt Zip Date Rec Reinsp Dt
 06 00-5823 13108 CHERWIN AVE 21220 7/28/2000 8/29/2000
 Tax Acct #: 0000000000

Complainant Name: (Last) (First)
 Addr: Str # Dir Street Name Type Apt
 City ST Zip
 Phone: (Home) (Work)

Problem: OPEN FIELD, HIGH GRASS, OIL TANK FILL, LOW WATER COLLECTING
 IN PONDS

A.D.C. : 30 K1C

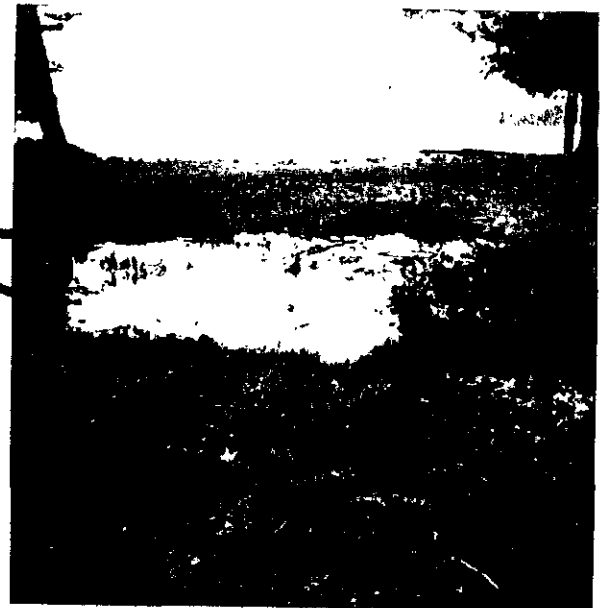
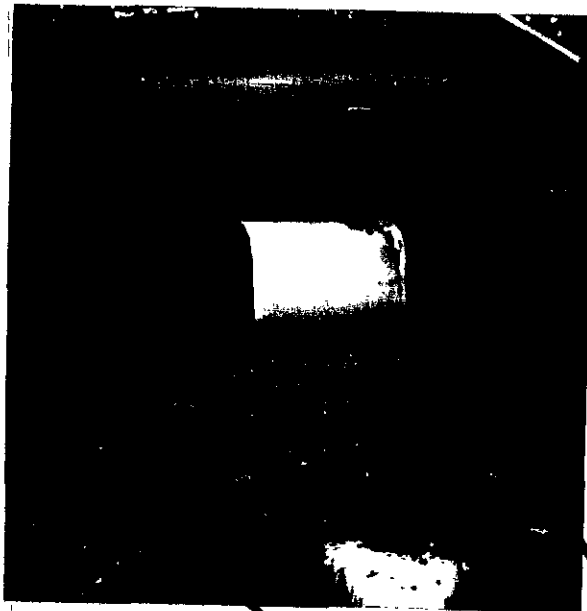
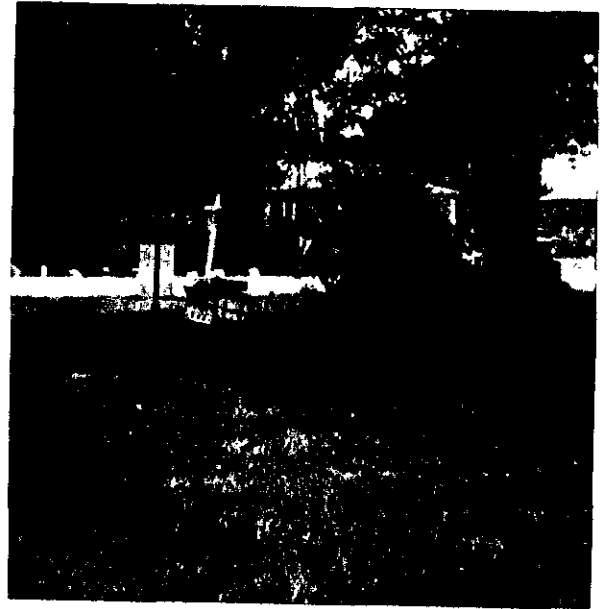
Notes: GRASS NOT HIGH ENOUGH FOR ACTION, MAILED NOTICE TO PROP OWNE
 R TO REMOVE OIL TANK, S KELLY

8/30/00 - Unimproved waterfront property, 1/4-1/2 acre
 - old purple martin bird "hotel" (junk), and
 pile of tree branches (± pickup truck load) on ground
 near road
 - oil tank
 - 15-20 ft diameter wind pool of water;
 pool is 1-3" deep, is stagnating with insect life
 in it, and there is a slight sheen of oil on some
 areas
 - Signs on property:
 For Sale: Remax - Keith A. Randlett
 410-382-4250
 Elite Realty 410-931-9200, ext 113
 Zoning Notice - Case # 01-044-A
 for variance to permit lot width of
 50 ft (lots 798)
 Zoning Notice - Case # 01-020-A
 same
 (lots 596)
 For Sale: Remax, ...
 all problems observed (above) are on "lots 595" area

photos taken
 Citation issued; Zoning commissioner notified R. Moorefield

File Updates

Case / date	Address	Comments
00-5823	13108 Chenwin Av.	



8/2/00

R. P. H. H. H.



Baltimore County
Department of Permits and
Development Management

Code Inspections and Enforcement
County Office Building
111 West Chesapeake Avenue
Towson, MD 21204

Code Enforcement: 410-887-3351
Building Inspection: 410-887-3953

Plumbing Inspection: 410-887-3620
Electrical Inspection: 410-887-3960

BALTIMORE COUNTY UNIFORM CODE ENFORCEMENT CITATION
SERVE ON RESIDENT AGENT, CORPORATE OFFICER, OWNER, TENANT, AS APPLICABLE

Citation/Case No. 00-5823	Property No. 15-08-800300	Zoning: DRS-5
Name(s): Karen M. Randlett		
Address: 13108 Cherwin Ave, Balto, Md 21220		
Violation Location: 13108 Cherwin Ave, Balto, Md 21220		
Violation Dates: 7-31-00, 8-30-00		

BALTIMORE COUNTY FORMALLY CHARGES THAT THE ABOVE-NAMED PERSON(S) DID
UNLAWFULLY VIOLATE THE FOLLOWING BALTIMORE COUNTY LAWS OR REGULATIONS:

- 1) Maintaining an open dump
 - 2) Collecting of water which is or may breed mosquitoes
- B.C.Z.R.: 101, 1B01.1A, 102.1
B.C.C.: 22-1, 22-2, 22-7, 22-49, (22-51) (4)
B.C.C.: 32-5

Pursuant to Section 1-8, Baltimore County Code, a civil penalty
has been assessed, as a result of the violation cited herein, in
the amount indicated:

\$ **2,000.00**

A quasi-judicial hearing has been pre-scheduled in Room 116,
111 West Chesapeake Avenue, Towson, Maryland, for:

Date: **10/17/00**

Time: **9:00 A.M.**

Citation must be served by:

Date: **9/14/00**

I do solemnly declare and affirm, under the penalty of perjury, that the contents stated above are true
and correct to the best of my knowledge, information, and belief.

Print Name: **R. T. Moorefield, R.S.**

Date: **8/30/00** Inspector's Signature: **R. T. Moorefield**

SEE REVERSE SIDE FOR ADDITIONAL DETAILS AND INFORMATION

NOTICE OF INTENTION TO DEFEND

Print Name:	Citation/Case No.:
Address:	

Date: Defendant's Signature

AGENCY

File Updates

Case / date	Address / Comments
	Enforcement Case #: 00-5823
10/18/00	Zoning Case #'s: 01-044A, and 01-020A Re: 13108 Cherwin Ave, Middle River 21220
	Notices and fines against this property have been repeatedly ignored by the owners of this property. As a result, a request has been made for "service by regular mail" to the owners. This service is a citation with accrued fines.
	C.C. to: Tim Kotroco M.S. 3401
	Reinspect: 12/1/00
	Reset hearing before Hearing Officer: 12/6/00
	<i>R. Mansfield</i>
10/18 notes:	Contacted complainant - no change to property - <u>second request</u> for service by regular mail - <u>second request</u> to have contractor make corrections and place lien on taxes <u>R.M.</u>

ZONING ENFORCEMENT REPORT

File

19-1805
332.3

DATE: 7/28/00 INTAKE BY: E.C. CASE #: 00-5823 INSPEC: 6

COMPLAINT

LOCATION: 13108 CHERWIN AVE

ZIP CODE: _____ DIST: _____

COMPLAINANT

NAME: Tim Martian PHONE #: (H) 335-2115 (W) 411

ADDRESS: 13108 CHERWIN AVE ZIP CODE: 21320

PROBLEM: open field signposts. dirt tank filled
low water collecting in ponds

IS THIS A RENTAL UNIT? YES _____ NO _____

IF YES, IS THIS SECTION 8? YES _____ NO _____

OWNER/TENANT

INFORMATION: _____

TAX ACCOUNT #: _____ ZONING: _____

INSPECTION:

To: Tim Kotroco, M.S. 3401

REINSPECTION:

cc: Zoning Enforcement Case File, Case #00-5823

Zoning Commissioner Hearing Case No: 01-044A

01-020A

REINSPECTION:

address: 13108 Cherwin Ave

owner: Karen M. Randlett

27

REINSPECTION:

R. Mansfield

RA10C1B

DATE: 07/28/2000

STANDARD ASSESSMENT INQUIRY (1)

TIME: 11:12:14

PROPERTY NO.	DIST	GROUP	CLASS	OCC.	HISTORIC	DEL	LOAD DATE
15 08 800300	15	3-1	34-00	N	NO		04/25/00

RANDLETT KAREN M

DESC-1.. IMPSLT 5,6,7,8
DESC-2.. TWIN RIVER BEACH
PREMISE. 13108 CHERWIN

13108 CHERWIN AVE

AVE
00000-0000

BALTIMORE

MD 21220-1006 FORMER OWNER: DONAHUE MILDRED L

----- FCV -----			----- PHASED IN -----		
	PRIOR	PROPOSED		CURR	CURR
LAND:	85,920	93,920		FCV	ASSESS
IMPV:	1,590	1,640	TOTAL..	90,193	36,070
TOTL:	87,510	95,560	PREF...	0	0
PREF:	0	0	CURT...	0	0
CURT:	0	0	EXEMPT.	0	0
DATE:	10/99	10/99			

---- TAXABLE BASIS ----		FM DATE
00/01 ASSESS:	36,070	11/21/99
99/00 ASSESS:	33,500	06/04/99
98/99 ASSESS:	61,890	06/05/98

ENTER-INQUIRY2 PA1-PRINT PF4-MENU PF5-QUIT PF7-CROSS REF

DE ENFORCEMENT REPO

49-1805
3323

DATE: 7/28/00 INTAKE BY: EC CASE #: 00-5823 INSPEC: 6

COMPLAINT

LOCATION: 13108 CHERWIN AVE

ZIP CODE: _____ DIST: _____

COMPLAINANT

NAME: Tim Martin PHONE #: (H) 3352115 (W) 31-398-4480

ADDRESS: 13106 CHERWIN AVE ZIP CODE: 71220

PROBLEM: open field Highgrass, oil tank filled
low water collecting in ponds

IS THIS A RENTAL UNIT? YES _____ NO _____

IF YES, IS THIS SECTION 8? YES _____ NO _____

OWNER/TENANT

INFORMATION: _____

TAX ACCOUNT #: _____ ZONING: _____

INSPECTION: GRASS NOT High enough for ACTION AT
THIS time. OIL TANK MUST BE REMOVED
MAILED NOTICE TO PROPERTY OWNER TO
REMOVE OIL TANK.

REINSPECTION: Reinspect 8-29-00

REINSPECTION: _____

REINSPECTION: _____

11/1/00
K. J. K. 11/1/00
3401
11/1/00



Baltimore County
Department of Permits and
Development Management

Code Inspections and Enforcement
County Office Building
111 West Chesapeake Avenue
Towson, MD 21204

Code Enforcement: 410-887-3351
Building Inspection: 410-887-3953

Plumbing Inspection: 410-887-3620
Electrical Inspection: 410-887-3960

BALTIMORE COUNTY UNIFORM CODE ENFORCEMENT CORRECTION NOTICE

Citation Case No. 00-5823 Property No. 15-08-800300 Zoning:

Name(s): KAREN M RANDETT

Address: 13108 CHERWIN AVE BALTIMORE 21220

Violation Location:

DID UNLAWFULLY VIOLATE THE FOLLOWING BALTIMORE COUNTY LAWS:

101; 102.1, 1801.1A
CEASE OUT SIDE STORAGE OF
UN USED OIL TANK. REMOVE TANK
FROM PROPERTY

YOU ARE HEREBY ORDERED TO CORRECT THESE VIOLATION(S) ON OR BEFORE:

On or Before: 8-29-00 Date Issued: 7-31-00

FAILURE TO COMPLY WITH THE DEADLINE STATED IS A MISDEMEANOR. A CONVICTION FOR EACH VIOLATION SUBJECTS YOU TO POTENTIAL FINES OF \$200, \$500, OR \$1000 PER DAY, PER VIOLATION, DEPENDING ON VIOLATION, OR 90 DAYS IN JAIL, OR BOTH.

Print Name:

INSPECTOR: M. STUART KELLY
STOP WORK NOTICE

PURSUANT TO INSPECTION OF THE FOREGOING VIOLATIONS, YOU SHALL CEASE ALL WORK UNTIL THE VIOLATIONS ARE CORRECTED AND/OR PROPER PERMITS OBTAINED. WORK CAN RESUME WITH THE APPROVAL OF THE DIVISION OF CODE INSPECTIONS AND ENFORCEMENT. THESE CONDITIONS MUST BE CORRECTED NOT LATER THAN

Not Later Than: Date Issued:

INSPECTOR:

Code Enforcement - Daily Worksheet

Inspector - R. Kelly

Case # Location Apt Zip Date Rec Reinsp #
 06 01-5423 13103 CHERWIN AVE 21220 7/23, 2000 6 23 2000
 AX Acct #: 0000000000

Complainant Name: Last (First)
 Addr: Str # Dir Street Name Type Apt
 City ST Zip
 Phone: Home Work

Problems: OPEN FIELD, HIGH GRASS, OIL TANK FILL, LOW WATER COLLECTING
 IN PONDS

A DC 30 K' L

Notes: GRASS NOT HIGH ENOUGH FOR ACTION, MAILED NOTICE TO PROP OWNE
 R TO REMOVE OIL TANK, S KELLY

8/30/00 - Unimproved waterfront property, 1/4-1/2 acre
 - old purple martin bird "hotel" (junk), and
 pile of tree branches (± 1 pickup truck load) on ground
 near road

- oil tank
 - 15-20 ft diameter mud pool of water.
 pool is 1-3" deep, is stagnating with mixed 1 1/2
 in it, and there is a slight sheen of oil on some
 areas

- Signs on property:

For Sale: Remax - Keith A. Randlett
 410-332-4250

Elite Realty 410-931-9400, ext 113

Zoning Notice - Case # 01-044-A

for variance to permit lot width of

50 ft (lots 7 & 8)

Zoning Notice - Case # 01-020-A

same
 (lots 5 & 6)

For Sale: Remax, ...

all problems observed (above) are on lots 5 & 6 area

photos taken

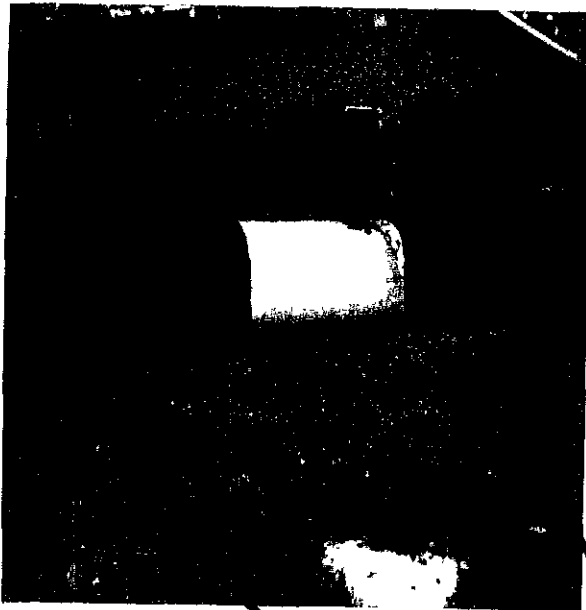
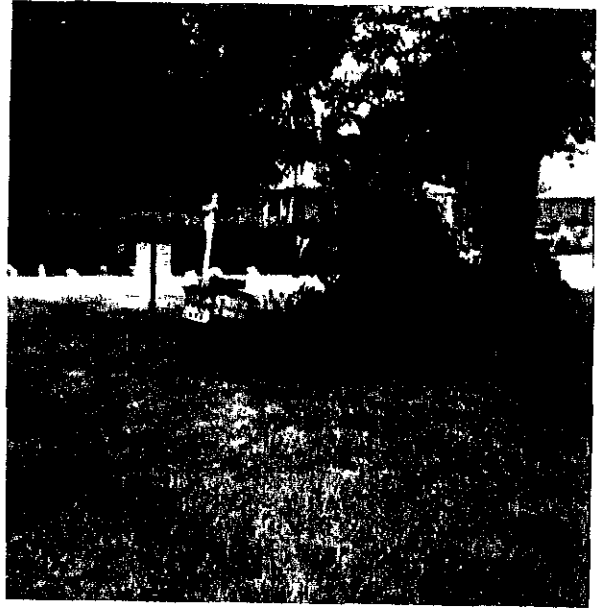
Citation issued; Zoning commissioner notified R. Kelly

File Updates

Case / date	Address / comments
8/30/00	
00-5823	13108 Cherwin Ave, Belts, Md 21220
	Zoned: DR 5.6
	Reinspection showed this property (4 lots) is set for Zoning hearings in Sept, 2000.
	Zoning Hearing Case # 01-044A
	and Case # 01-020A.
	This property is currently in violation of the zoning regulations, and the owner is being charged with an "open dump."
	As part of the problem involves a home heating oil tank, and as I observed oil on the water in ponding water adjacent to the tank, this property has also been referred to D.E.P.R.M. for investigation.
	R. Mansfield
	CC to: Tim Kotroco, Deputy Zoning Commissioner
	<u>M.S. 3401</u>

File Updates

Case / date	Address / comments
2-5823	1313 Cherm. Av



8/2/55
Cherm. Av

DEPARTMENT OF PERMITS & DEVELOPMENT MANAGEMENT

Located at 111 W. Chesapeake Avenue, County Office Building, Room 106,
Towson, Maryland 21204

00-5823

BALTIMORE COUNTY

vs.

Karen M. Randlett

Defendant 8944 Quail Run Drive

HEARING DATE: 10/12/00 ISSUE DATE: 8/30/00 EXPIRATION DATE: 9/14/00

REQUEST FOR SERVICE

Please serve the attached process on the person shown.

ADC: 29-E-8

ORDER FOR SERVICE

You are hereby commanded to serve the attached process and to make your return promptly on this Order if served, and if you are unable to serve, you are to make your return on this Order and return the original process no later than the last day following the termination of the validity of the process.

PROOF OF SERVICE

I CERTIFY

___ that I served a Citation and all other papers filed with it by ___ restricted delivery mail, return card attached

___ that I served by personal delivery to _____ (name)

_____ on _____ at _____
title date time

Description of defendant: Race _____ Sex _____ Ht. _____

Wt. _____ Age _____ Other _____

___ and left with him a copy of the citation and all other papers filed with it.

___ I posted the premises at _____

☒ I was unable to serve because no one present 8/30/00, and

9/12/00 no one home @ 8944 Quail Run ; 1:12 P.M. nm

I solemnly affirm under the penalties of perjury that the contents of the foregoing paper are true to the best of my knowledge, information and belief and do further affirm I am a competent person over 18 years of age and not a party to the case.

9/6/00
Date

R. T. Moorfield, R.S.
Signature

CEO
Title

Time

111 W. Chesapeake Pk.
Address

X 5855

Telephone number

1/12/00 Had. CC's of notice sent to both addresses by certified mail

(note: left CC of citation between storm door and door (inside) @ Quail Run Dr.
R. Moorfield)



Baltimore County
Department of Permits and
Development Management

Code Inspections and Enforcement
County Office Building
111 West Chesapeake Avenue
Towson, MD 21204

Code Enforcement:

410-887-3351

Plumbing Inspection:

410-887-3620

Building Inspection:

410-887-3953

Electrical Inspection:

410-887-3960

BALTIMORE COUNTY UNIFORM CODE ENFORCEMENT CITATION

SERVE ON RESIDENT AGENT, CORPORATE OFFICER, OWNER, TENANT, AS APPLICABLE

Citation/Case No.	Property No.	Zoning
00-5823	15-08-800300	DRS-5

Name(s): Karen M. Randlett

Address: 13108 Cherwin Ave, Balh, Md 21220

Violation Location: 13108 Cherwin Ave, Balh, Md 21220

Violation Dates: 7-31-00, 8-30-00

BALTIMORE COUNTY FORMALLY CHARGES THAT THE ABOVE-NAMED PERSON(S) DID UNLAWFULLY VIOLATE THE FOLLOWING BALTIMORE COUNTY LAWS OR REGULATIONS:

- 1) Maintaining an open dump
 - 2) Collecting of water which is or may breed mosquitoes
- B.C.Z.R.: 101, 1B01.1A, 102.1
- B.C.C.: 22-1, 22-2, 22-7, 22-49, (22-51(b))
- B.C.C.: 32-5

Pursuant to Section 1-3, Baltimore County Code, a civil penalty has been assessed, as a result of the violation cited herein, in the amount indicated:

\$ 2,000.00

A quasi-judicial hearing has been pre-scheduled in Room 116, 111 West Chesapeake Avenue, Towson, Maryland, for:

Date: 10/17/00

Time: 9:00 A.M.

Citation must be served by:

Date: 9/14/00

I do solemnly declare and affirm, under the penalty of perjury, that the contents stated above are true and correct to the best of my knowledge, information, and belief.

Print Name: R. T. Moorefield, R.S.

Date: 8/30/00 Inspector's Signature: R. T. Moorefield

SEE REVERSE SIDE FOR ADDITIONAL DETAILS AND INFORMATION

NOTICE OF INTENTION TO DEFEND

Print Name:	Citation/Case No.:
-------------	--------------------

Address:

Date: Defendant's Signature

DEFENDANT

IN THE MATTER OF
BALTIMORE COUNTY

vs. Karen M. Randlett

* BEFORE THE CODE OFFICIAL
* OF BALTIMORE COUNTY
*

Case No.: 00 - 5823
Violation Address:
13108 Cherwin Ave.
Balto, Md 21220

* * * * *
MOTION TO SERVE BY REGULAR MAIL

TO THE DIRECTOR:

Please enter an Order, under Maryland Rule 3-121, to allow the above-named violators to be served by regular mail and to deliver a copy of the citation to a person of suitable age and discretion at the place of business, dwelling house, or usual place of abode of the violator (s) for the following reasons:

1. Service of the citation was attempted by certified mail, return receipt requested, on _____ occasions, and the certified mail was returned, refused, or unclaimed.
2. The affiant, or someone on his or her behalf, attempted to serve the violator at their known home or business address at 13108 Cherwin Ave 21220 and was unable to locate the violator at that address.
3. Your affiant believes that the violator is attempting to evade service (please check one or more):
 - _____ a. by not accepting the certified mail,
 - _____ b. by ignoring the post office notice,
 - _____ c. by refusing to answer the front door,
 - _____ d. by going out the back door or,
 - X e. No physical means of personal service (over)

I solemnly affirm, under penalties of perjury, that the content of the foregoing are true to the best of my knowledge, information, and belief.

Service under Maryland Rule 3-121 is ordered.

Director

Date

W. J. Murphy, Jr.
Inspector

9/6/00
Date

This is a vacant lot, with only
a mailbox & street #.

I interviewed the next door neighbor
who stated that the defendant does,
from time-to-time, come by to
pick up mail from that mailbox.

R. Mansfield

Print Key Output
5769SS1 V4R4M0 990521 S1019666 09/12/00 Page 1 08:24:31

Display Device : DSP02
User : PL055

Soundex	Name	City	Hgt	Wgt	Race	Sex	DoB
Street			County	State	Zip	Priv.	
R534461585569	KAREN MARIE RANDLETT		4-11	105	2	F	071963
8944 QUAIL RUN DRIVE		PERRING HALL	BA	MD	21128	PRIV	

Perry

>>> INTERROGATION COMPLETE; KAREN M RANDLETT <<<
PAGING MODE: PAGE 1 OF 1JJPf1-FWD PF2-BWD PF3-EX PF4-1ST PF5-LST

File Updates

Case / date	Address / comments
20-5823	13108 Cherwin Ave.
9/12/00	• Attempted service @ 8944 Quail Run Dr. (ADC. 29E8). • No one was home; left CC. of citation between front door and storm door • Sent CC's of citation by certified mail to both Cherwin Ave, and to Quail Run Dr.

J.M. 10/12/00

R. Moorfield



Code Ent
Building
BAL

Citation: 00

Name(s):

Address:

Violation

Location:

Violation

Dates:

BA

UNC

1) A

2) C

Pursuant
has been
the amount

A quasi-j
111 West

Citation

I do solemn
and corre

Print Name

Date

Print Name

Address:

Date

RETURN RECEIPT REQUESTED

Enter fees for the services requested in
this receipt. If return receipt is requested, check the
box for return receipt.

TURN RECEIPT REQUESTED adjacent to
if you want delivery restricted to the addressee, endorse RESTRICTED DELIVERY

Receipt prepared by
date, detach and
mail. Write the certificate
number 3811, and attach
mail. Otherwise, all
mail is delivered to the addressee.

Do not mail in this section
No return receipt in this section
MAIL

NANCY WHITE RANDLETT
8944 QUAIL RUN DR
PERRY HALL MD 21128

Notice
OCT 16 2nd
Notice
9/14/74
9/15/74

616 BEAVER DAM RD
JACKSONVILLE MD 21034
Z 479 393 004

lent

887-3620
887-3960

ION

5

5

5

5

5

5

5

5

5

5

5

5

5

5

5

5

5

recement

luc

410-887-3620

410-887-3960

TATION

5.5

20

20

(S) DID
LATIONS

signature

(22-51(4))

00

1,00

A.M.

100

above are true

ION

e No

DEFENDANT

2. If you CONTEST by an appeal from the date of request for a hearing, you must file a request for a hearing with the County Office Building, Room 116, 111 West Chesapeake Avenue, Towson, Maryland 21204.

Permits and Management

County Office Building
111 West Chesapeake Avenue
Towson, MD 21204

Plumbing Inspection: 410-887-3620

Electrical Inspection: 410-887-3960

410-887-3351

410-887-3953

UNIFORM CODE ENFORCEMENT CITATION

AGENT, CORPORATE OFFICER, OWNER, TENANT, AS APPLICABLE

Party No. 08-800300 Zoning: DR 5-5

M. Randlett

Cherwin Ave, Balto, Md 21220

Cherwin Ave, Balto, Md 21220

00, 8-30-00

I HEREBY CHARGE THAT THE ABOVE-NAMED PERSON(S) DID
THE FOLLOWING BALTIMORE COUNTY LAWS OR REGULATIONS:

an open dump
water which is or may breed mosquitoes
R: 101, 1B01-1A, 102-1
22-1, 22-2, 22-7, 22-49, (22-51(A))
32-5

County Code, a civil penalty
for the violation cited herein, in

\$ 2,000.00

pre-scheduled in Room 116,
Towson, Maryland, for:

Date: 10/17/00

Time: 9:00 A.M.

Date: 9/14/00

Under the penalty of perjury, that the contents stated above are true
to the best of my knowledge, information, and belief.

T. Moorefield, R.S.

T. Moorefield
Signature

FOR ADDITIONAL DETAILS AND INFORMATION

STATE OF INTENTION TO DEFEND

Citation/Case No.:

Defendant's Signature

RECEIVED
OCT 17 2000
PERMITS AND
MANAGEMENT
FBI 441

MAIL

CERTIFIED

Fold at line over top of envelope
the right of the return address

Z 479 393 005

UNCLAIMED

KAREN M RANDLETT
12103 CHERWIN AVE
BALTIMORE, MD 21220

RETURN RECEIPT REQUESTED

postage stamps to article to cover F
for any selected optional services
ou want this receipt postmarked, sign
be leaving the receipt attached, and
w or hand it to your retail carrier (no ex
you do not want this receipt postmark
Tenderness of the article, date, detach a
you want a return receipt while the re
return receipt card, Form 3811, and at
and make it space permits. Otherwise
URN RECEIPT REQUESTED requires
t you want delivery restricted to the
person authorize RESTRICTED DELIV
Enter fees for the services requeste
If return receipt is requested, cliv
Save this receipt and present it if you

File Updates

Case / date	Address / Comments
	Enforcement Case #: 00-5823
10/18/00	Zoning Case #'s: 01-044A, and 01-020A Re: 13108 Cherwin Ave, Middle River 21220
	Notices and fines against this property have been repeatedly ignored by the owners of this property. As a result, a request has been made for "service by regular mail" to the owners. This service is a citation with accrued fines.
	C.C. to: Tim Kotroco M.S. 3401
	Reinspect: 12/1/00
	Reset hearing before Hearing Officer: 12/6/00
	<i>R. Mansfield</i>
10/18 Notes:	Contacted complainant - no change to property - <u>Second request</u> for service by regular mail - <u>Second request</u> to have contractor make corrections and place lien on taxes <u>R.M.</u>

GRASS & WEEDS/TRASH & DEBRIS

BID CHECK LIST

1. INSPECTORS INITIALS RM
2. CASE NO. 00-5823
3. VACANT _____ UNIMPROVED X OCCUPIED _____
4. CORRECTION NOTICE POSTED ON SITE? YES X NO _____
5. SENT CORRECTION NOTICE BY REGULAR MAIL TO OWNER SHOWN ON CURRENT TAX PRINT OUT? YES X NO _____
6. ADC MAP COORDINATES 30-K-10

LIST WORK TO BE DONE / ITEMS TO BE REMOVED IN DETAIL.

- 1) Remove brush / tree branches pile
- 2) Remove oil tank
- 3) Remove any remaining accumulation of materials / debris
- 4) Using clean fill, fill in ponding area in center of lot.

OUT _____

IN THE MATTER OF
BALTIMORE COUNTY

vs. *Karen M. Randlett*

Defendant/Property Owner

* BEFORE THE CODE OFFICIAL

* OF BALTIMORE COUNTY

*

Case No.: *00-5823*

* Violation Address:

*13108 Cherwin Ave.
Baltimore, Md. 21220*

*

* * * * *
MOTION TO SERVE BY REGULAR MAIL

TO THE DIRECTOR:

Please enter an Order, under Maryland Rule 3-121, to allow the above-named violators to be served by regular mail and to deliver a copy of the citation to a person of suitable age and discretion at the place of business, dwelling house, or usual place of abode of the violator(s) for the following reasons:

1. Service of the citation was attempted by certified mail, return receipt requested, on 6 occasions, and the certified mail was returned, refused, or unclaimed.
2. The affiant, or someone on his or her behalf, attempted to serve the violator at their known home or business address at 13108 Cherwin Ave, AND 8944 Quail Run Dr. and was unable to locate the violator at that address. *21220 21128*
3. Your affiant believes that the violator is attempting to evade service (please check one or more):

- ☒ a. by not accepting the certified mail,
- ☒ b. by ignoring the post office notice,
- ☐ c. by refusing to answer the front door,
- ☐ d. by going out the back door or,
- ☒ e. A copy of notice/citation also posted at 8944 Quail Run.

This was also ignored.

I solemnly affirm, under penalties of perjury, that the content of the foregoing are true to the best of my knowledge, information, and belief.

Service under Maryland Rule 3-121 is ordered.

Stanley J. Sepine
for the Director

R. T. Moorefield, R. S.
Inspector

10/18/00
Date

10/18/00
Date



Baltimore County
Department of Permits and
Development Management

Code Inspections and Enforcement
County Office Building
111 West Chesapeake Avenue
Towson, MD 21204

Code Enforcement: 410-887-3351
Building Inspection: 410-887-3953

Plumbing Inspection: 410-887-3620
Electrical Inspection: 410-887-3960

BALTIMORE COUNTY UNIFORM CODE ENFORCEMENT CITATION
SERVE ON RESIDENT AGENT, CORPORATE OFFICER, OWNER, TENANT, AS APPLICABLE

Citation Case No. 00-5823 Property No. 15-08-800300 Zoning: DR5-5

Name(s): Karen M. Randlett

Address: 13108 Cherwin Ave, Balt, Md 21220

Violation Location: 13108 Cherwin Ave

Violation Dates: 7-31-00, and continuing through 10-18-00

BALTIMORE COUNTY FORMALLY CHARGES THAT THE ABOVE-NAMED PERSON(S) DID
UNLAWFULLY VIOLATE THE FOLLOWING BALTIMORE COUNTY LAWS OR REGULATIONS:

- 1) Maintaining an open dump (oil tank, brush pile, misc piled materials)
 - 2) Collecting of water which is or may breed mosquitoes (failure to fill in ponding)
- B.C.Z.R.: 101, 1B01.1A, 102.1
B.C.C.: 22-1, 22-2, 22-7, 22-49, 22-51(b), 32-5

Pursuant to Section 1-8, Baltimore County Code, a civil penalty has been assessed, as a result of the violation cited herein, in the amount indicated:

\$ 31,600.00

A quasi-judicial hearing has been pre-scheduled in Room 116, 111 West Chesapeake Avenue, Towson, Maryland, for:

Date: 12/06/00

Time: 9:00 A.M.

Citation must be served by:

Date: 10/18/00

I do solemnly declare and affirm, under the penalty of perjury, that the contents stated above are true and correct to the best of my knowledge, information, and belief.

Print Name: R. T. Moorefield, R. S.

Date: 10/18/00 Inspector's Signature: R. T. Moorefield

SEE REVERSE SIDE FOR ADDITIONAL DETAILS AND INFORMATION

NOTICE OF INTENTION TO DEFEND

Print Name: _____ Citation/Case No.: _____

Address: _____

Date: _____ Defendant's Signature: _____



Baltimore County
Department of Permits and
Development Management

Code Enforcement and Enforcement
County Office Building
111 West Chesapeake Avenue
Towson, MD 21204

Code Enforcement:
Building Inspection:

410-887-3351
410-887-3953

Plumbing Inspection: 410-887-3620
Electrical Inspection: 410-887-3960

BALTIMORE COUNTY UNIFORM CODE ENFORCEMENT CITATION
SERVE ON RESIDENT AGENT, CORPORATE OFFICER, OWNER, TENANT, AS APPLICABLE

Citation Case No. 00-5823 Property No. 15-08-800300 Zoning: DRS.5

Name(s): Karen M. Randlett

Address: 8944 Quail Run Dr, Perry Hall, Md 21128

Violation Location: 13108 Cherwin Ave, Balt, Md 21220

Violation Dates: 7/31/00 and continuing through 10/18/00

BALTIMORE COUNTY FORMALLY CHARGES THAT THE ABOVE-NAMED PERSON(S) DID
UNLAWFULLY VIOLATE THE FOLLOWING BALTIMORE COUNTY LAWS OR REGULATIONS:

- 1) Maintaining an open dump (oil tank, brush pile, misc piled materials)
- 2) Collecting of water which is or may become a breeding site for mosquitoes (Failure to fill in ponding)

BCZR: 101, 1B01.1A, 102-1

BCC: 22-1, 22-2, 22-7, 22-49, 22-51(b), 32-5

Pursuant to Section 1-8, Baltimore County Code, a civil penalty has been assessed, as a result of the violation cited herein, in the amount indicated: \$ 31,600.00

A quasi-judicial hearing has been pre-scheduled in Room 116, 111 West Chesapeake Avenue, Towson, Maryland, for:

Date: 12/06/00

Time: 9:00 A.M.

Citation must be served by: Date: 11/02/00

I do solemnly declare and affirm, under the penalty of perjury, that the contents stated above are true and correct to the best of my knowledge, information, and belief.

Print Name: R.T. Moorefield, R.S.

Date: 10/18/00 Inspector's Signature: R.T. Moorefield

SEE REVERSE SIDE FOR ADDITIONAL DETAILS AND INFORMATION

NOTICE OF INTENTION TO DEFEND

Print Name: Citation/Case No.:

Address:

Date: Defendant's Signature:

AGENCY

Code Enforcement - Daily Worksheet

Inspector - RM

Area Case #	Location	Apt	Zip	Date Rec	Reinsp Dt
006 00-7128	7 RIDGEMOOR RD		21221	9/15/2000	10/18/2000

Tax Acct #: 0000000000

Complainant Name: (Last) COUNCILMAN (First) OLSZEWSKI
 Addr: Str # Dir Street Name Type Apt
 City ST Zip
 Phone: (Home) (Work) 410/887-7174

Problem: ADC: 37A10, OPEN DUMP IN REAR YARD

Notes: 9/18/00, CONTACTED AN UNIDENTIFIED MAN ON PROP WHO STATED SHE WAS AWARE OF PROBLEM, SAW AN ACCUMULATION OF MISC BLACK GARBAGE BAGS (FULL) BULK ITEMS STORED AGAINST REAR FENCE, ADVISED THAT NOTICE WILL BE SENT TO CLEAN UP, SENT COUNCILMAN OLSZEWSKI COPY, FAMILIAR W/CASE - COUNTY HAS ORDERED THESE PEOPLE TO CLEAN UP OVER THE LAST 20 YEARS, R MOOREFIELD.

10/19/00

mattresse + misc. junk ("Bits + Pieces")
 Shed door still open - missing
 old typewriter, old drum, covered shopping cart
 old, rusty red wagon w/ Blue Bag in it - Portable Toilet,
 old grill - 3 photos taken
 - Citation issued on 10/18 (reissue)
 - Councilman O's office advised of action by phone

J.M. 12/1

RM

Code Enforcement - Daily Worksheet

Inspector -

Area Case # Location Apt Zip Date Rec Reinsp Dt
006 00-5823 13108 CHERWIN AVE 21220 7/28/2000 10/18/2000
Tax Acct #: 1508800300

Complainant Name: (Last) MARTIAN (First) JIM
 Addr: 13106 CHERWIN AVE
 Str # Dir Street Name Type Apt
 BALTIMORE MD 21220
 City ST Zip
 Phone: (Home) 410/335-2115 (Work)

Problem: 30K10; OPEN FIELD, HIGH GRASS, OIL TANK FILL, LOW WATER COLL
 ECTING IN PONDS

Notes: GRASS NOT HIGH ENOUGH FOR ACTION, MAILED NOTICE TO PROP OWNE
 R TO REMOVE OIL TANK, S KELLY. 8/30 SEE CASE FILE (R. MOOREFI
 ELD). 9/5/00, GIVE TO R MOOREFIELD. 9/12/00, ATTEMPTED SER
 VICE @ 8944 QUAIL RUN DR, NO ONE HOME, LEFT CC OF CITATION
 BETWEEN FRONT DOOR & STORM DOOR, SENT CC'S OF CITATION BY
 CERTIFIED MAIL TO BOTH CHERWIN AVE & QUAIL RUN RD, R MOOREFI
 ELD. 10/17/00, P/U 10/18/00 FOR R MOOREFIELD FOR CITATION,
 J ROSENDALE. 10/17/00-CERTIFIED CITATION RETURNED AS UNCLA
 IMED FROM KAREN RANDLETT.

10/19/00 - no changes at all. Citation Issued on 10/18

KEITH ANDREW RANDLETT
8944 Quail Run Drive
Baltimore, MD 21128

Plaintiff

vs.

KAREN MARIE RANDLETT
50 Olde Forge Lane
Baltimore, Maryland 21236

Defendant

* IN THE
* CIRCUIT
* COURT FOR
* BALTIMORE
* COUNTY
*
* Case No.:

Red No 2

* * * * *

COMPLAINT FOR ABSOLUTE/LIMITED DIVORCE

NOW COMES, Keith Andrew Randlett, Plaintiff, by and through his attorney, Raymond M. Atkins, Jr., and hereby files this Complaint for Absolute/Limited Divorce against Karen Marie Randlett, Defendant, and respectfully states the following in support thereof:

FACTS COMMON TO ALL COUNTS

1. That the Plaintiff is an adult resident of the State of Maryland for more than one year prior to the filing of this Complaint.
2. That the Parties were married by a religious ceremony at Dulaney Valley United Methodist Church on the 19th day of January 1985 in Baltimore, Maryland.
3. That two children were born as result of said marriage, namely ERIKA MARIE RANDLETT, d/o/b, July 26, 1985, and KEITH ADAM RANDLETT d/o/b September 6, 1988.
4. That all the said children are the minor children within the purview of Subtitle

Two of Title Eight of the Family Law Article (1999) of the Annotated Code of

RECEIVED AND FILED

00 AUG 21 PM 3:08

CLERK OF THE CIRCUIT COURT
BALTIMORE COUNTY

Maryland, and any amendments thereto, and Keith Adam Randlett is presently in the sole custody of the Plaintiff, Keith Andrew Randlett, and has been continuously since the separation of the Parties. That the said Erika Marie Randlett has been in the shared/joint custody of the Parties.

5. That the Plaintiff, Keith Andrew Randlett, is a fit and proper person to have sole custody of the minor child, Keith Adam Randlett, and the shared/joint custody of the Parties . It is in their best interest and advantage that they be in the aforementioned care, custody, and control.
6. That the Plaintiff, Keith Andrew Randlett, is in an inferior financial position to the Defendant, Karen Marie Randlett and the minor children living with him are in need of financial assistance from the Defendant, Karen Marie Randlett, to provide support and maintenance for said minor children of the Parties, alimony and maintenance for the Plaintiff, and to pay court costs and attorney's fees for the Plaintiff.
7. That subsequent to their marriage, the Plaintiff purchased the property known as 8944 Quail Run Drive, Baltimore, Maryland 21128, and that property was the principal residence of the Parties when they lived together.
8. That said property is and will be used by the Plaintiff, and his minor children as their principal residence; that said property is the family home within the purview of Subtitle Two of Title Eight of Family Law Article (1999) of the Annotated Code of Maryland, and any amendments thereto.
9. That this real property is owned by the Plaintiff, and has been used by the

Plaintiff as his personal residence.

10. That the Plaintiff acquired certain personal and real property prior to, and during the marriage by gifts from third Parties, and also by inheritance, all of which personal property, the Plaintiff desires the Court to declare to be his sole and separate property.

11. That the Parties acquired several vehicles, which are still in their possession, as of the date of filing of this Complaint, including, but not limited to a 1994 Lincoln Continental, which is used for family purposes.

12. That the Parties have accumulated substantial personal property during their marriage, including but not limited to children's furniture and the furnishings of the aforementioned real property located at 8944 Quail Run Drive, Baltimore, Maryland 21128.

13. That during the Parties' marriage, they acquired other personal property, including but not limited to, retirement rights, profit plans, checking and savings accounts, and life insurance policies; some of which are titled in the joint names of the Parties, some of which are titled in sole names of the Parties.

COUNT I VOLUNTARY SEPARATION

All of the allegations set forth in Paragraphs 1 through 13 above are incorporated herein, and made a part hereof, as if fully set forth;

14. That the Parties did mutually and voluntarily agree to live separate and apart from one another on April 8, 2000, for the express purpose of terminating the marriage, said voluntary separation was deliberate and the final act of both Parties, and there is no

hope or possibility of reconciliation.

WHEREFORE, the Plaintiff respectfully requests this Honorable Court:

- A. ORDER, That the Plaintiff, Keith Andrew Randlett , be granted an Absolute/
Limited Divorce from the Defendant, Karen Marie Randlett ;
- B. ORDER, That the Plaintiff, Keith Andrew Randlett, be awarded sole custody,
both pendente lite and permanently, of the minor children of the Parties, namely,
Erika Marie Randlett and Keith Adam Randlett;
- C. ORDER, That the Plaintiff, Keith Andrew Randlett, be awarded a reasonable
sum as determined by the Maryland Child Support Guidelines of the pendente
lite and permanent support of the minor children of the Parties;
- D. ORDER, That the Plaintiff, Keith Andrew Randlett, be awarded alimony both
pendente lite and permanently;
- E. ORDER, That the Plaintiff, Keith Andrew Randlett, be awarded court costs
and attorney's fees;
- F. ORDER, That the property known as 8944 Quail Run Drive, Baltimore,
Maryland 21128, be declared the family home pursuant to Section §8-207
of the Family Law Article (1999) Annotated Code of Maryland, and any
amendments thereto;
- H. ORDER, That the Plaintiff, Keith Andrew Randlett, be granted the Use and
Possession both pendente lite and permanently of the family home and family
use personal property, pursuant to Section §8-207 (a) (b) (c) of the Family Law
Article (1999) of the Annotated Code of Maryland, and any amendments thereto;

- I. That the Court Order an allocation of financial responsibilities for mortgage indebtedness and the costs of maintenance, insurance, assessments and taxes, and repairs pursuant to Section § 8-208 of the Family Law Article (1999) of the Annotated Code of Maryland, and any amendments thereto, and to award the Plaintiff past expenses which he has come by necessity for the mortgage on said real property;
- J. ORDER, That the Court determine the ownership of all personal property regardless of how titled pursuant to Section § 8-207 of the Family Law Article (1999) of the Annotated Code of Maryland, and any amendments thereto;
- K. ORDER, That the court determine which property is marital property pursuant to Section § 8-203 of the Family Law Article (1999) of the Annotated Code of Maryland, and any amendments thereto;
- L. ORDER, That pending any final determination of support and property disputes, the Defendant, Karen Marie Randlett, be restrained and enjoined from selling, giving away, or otherwise disposing or encumbering any assets that are held jointly with the Plaintiff, individually by the Defendant or jointly by the Defendant, and the Third Party; and
- M. For such other and further relief as the nature of the Plaintiff's cause may require.

COUNT II ABANDONMENT

All of the allegations set forth in Paragraphs 1 through 13 above are incorporated

herein, and made a part hereof, as if fully set forth;

15. That on or about April 8, 2000, the Defendant, Karen Marie Randlett, did without just cause, unreasonably abandon and desert the Plaintiff, Keith Andrew Randlett, with the intention of ending their marriage. The said abandonment was her final and deliberate act, and was continued uninterruptedly up and to and including the time of the filing of this Complaint, and there is no reasonable hope of a reconciliation between the Parties.

WHEREFORE, the Plaintiff respectfully requests this Honorable Court:

- A. ORDER, That the Plaintiff, Keith Andrew Randlett, be granted an Absolute Divorce from the, Karen Marie Randlett ;
- B. ORDER, That the Plaintiff, Keith Andrew Randlett, be awarded sole custody, both pendente lite and permanently, of the minor children of the Parties, namely, Erika Marie Randlett, and Keith Adam Randlett.;
- C. ORDER, That the Plaintiff, Keith Andrew Randlett, be awarded a reasonable sum as determined by the Maryland Child Support Guidelines of the pendente lite, and permanent support of the minor children of the Parties;
- D. ORDER, That the Plaintiff, Keith Andrew Randlett, be awarded alimony both pendente lite and permanently;
- E. ORDER, That the Plaintiff, Keith Andrew Randlett, be awarded court costs and attorney's fees;
- F. That the property known as 8944 Quail Run Drive, Baltimore, Maryland, 21128, be declared the family home pursuant to Section § 8-207 of the Family Law Article

(1999) of the Annotated Code of Maryland, and any amendments thereto;

G. That the Plaintiff, Keith Andrew Randlett, be granted the Use and Possession in order pendente lite of the family home and family use personal property, pursuant to Section § 8-207 (a) (b) (c) of the Family Law Article (1999) of the Annotated Code of Maryland, and any amendments thereto;

H. That the Court Order an allocation of financial responsibilities for mortgage indebtedness and the costs of maintenance, insurance, assessments and taxes, and repairs pursuant to Section § 8-208 of the Family Law Article (1999) of the Annotated Code of Maryland, and any amendments thereto;

I. ORDER, That the Court determine the ownership of all personal property regardless of how titled pursuant to Section § 8-207 of the Family Law Article (1999) of the Annotated Code of Maryland, and any amendments thereto;

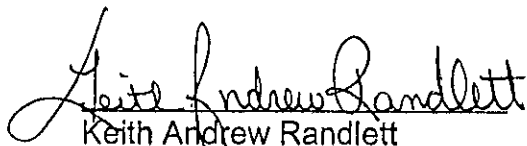
J. ORDER, That the court determine which property is marital property pursuant to Section § 8-203 of the Family Law Article (1999) of the Annotated Code of Maryland, and any amendments thereto.

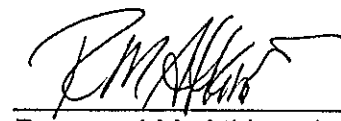
K. ORDER, That the Court award the Plaintiff, Keith Andrew Randlett, equitable amount of the marital property and determine the value of the marital property pursuant to Sections § 8-203, § 8-204 and § 8-205 of the Family Law Article (1999) of the Annotated Code of Maryland, and same be reduced to a monetary award and judgment in favor of the Plaintiff, Keith Andrew Randlett.

L. ORDER, That pending any final determination of support and property disputes, the Defendant, Karen Marie Randlett, be restrained and enjoined from

selling, giving away, or otherwise disposing or encumbering any assets that are held jointly with the Counter-Plaintiff, individually by the Defendant or jointly by the Defendant, and the Third Party;

M. For such other and further relief as the nature of the Plaintiff's cause may require.

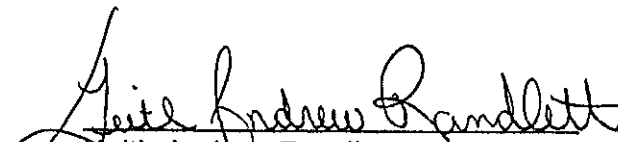

Keith Andrew Randlett



Raymond M. Atkins, Jr.
105 W. Chesapeake Avenue, Suite 102
Towson, Maryland 21204
(410) 321-7117

Attorney for the Plaintiff

I DO SOLEMNLY DECLARE AND AFFIRM THAT UNDER PENALTIES OF PERJURY, THE CONTENTS OF THE AFOREGOING COMPLAINT FOR ABSOLUTE/LIMITED DIVORCE ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEFS.


Keith Andrew Randlett

Design R152

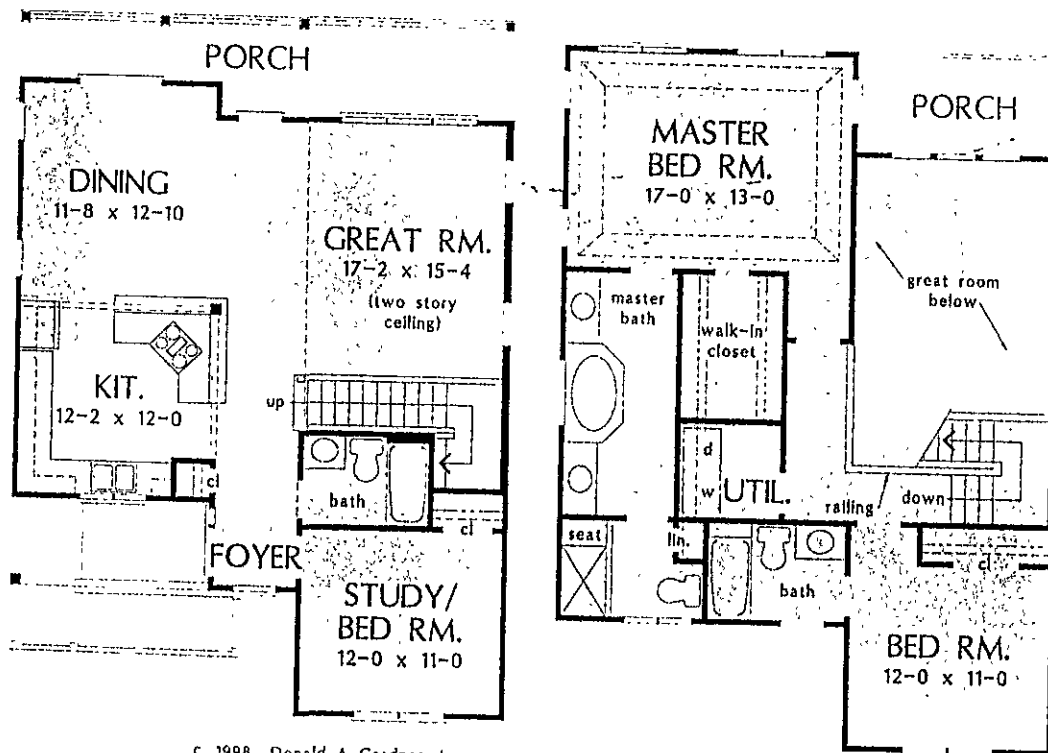
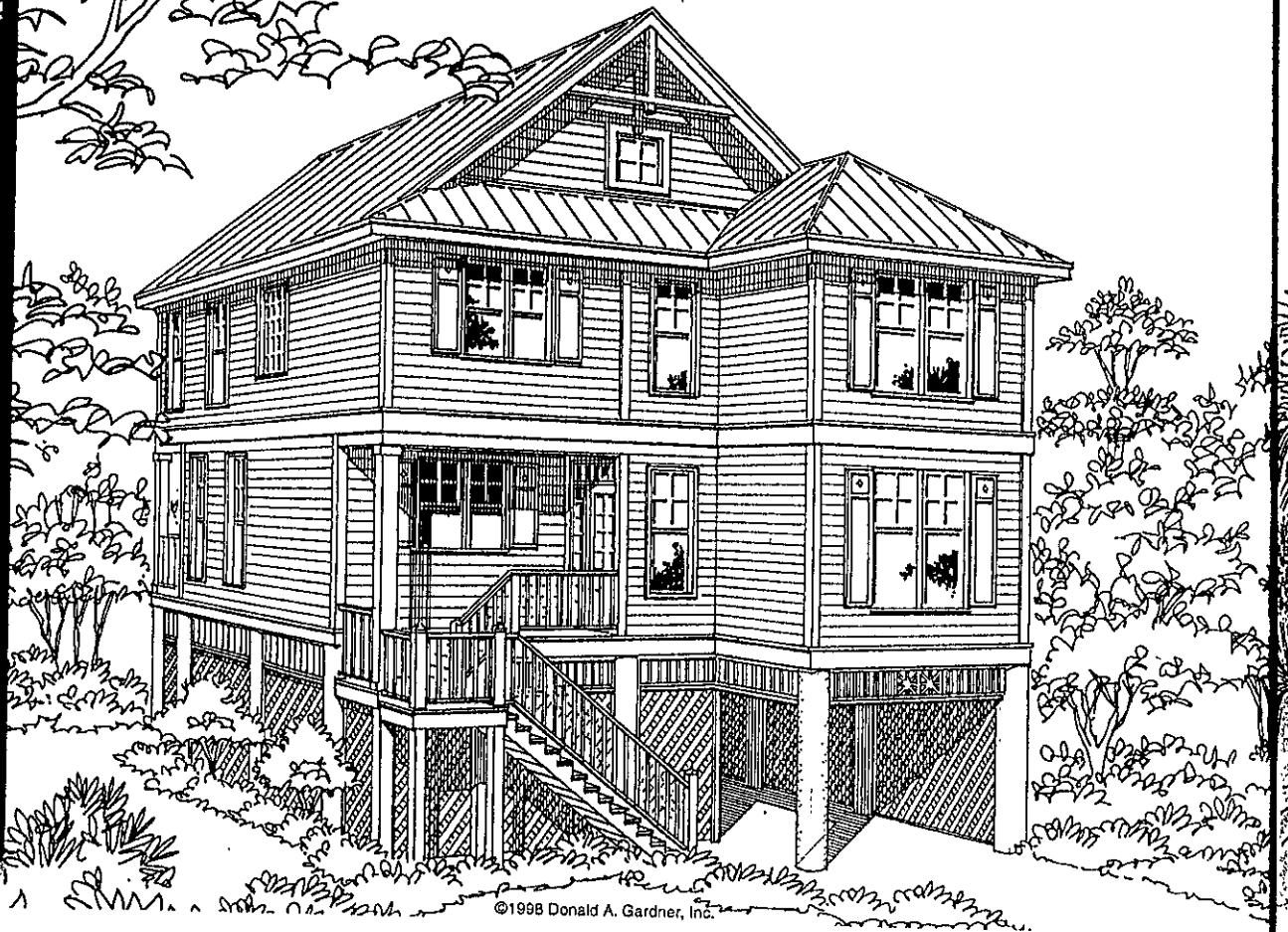
First Floor:
944 sq. ft.

Second Floor:
826 sq. ft.

Total:
1,770 sq. ft.

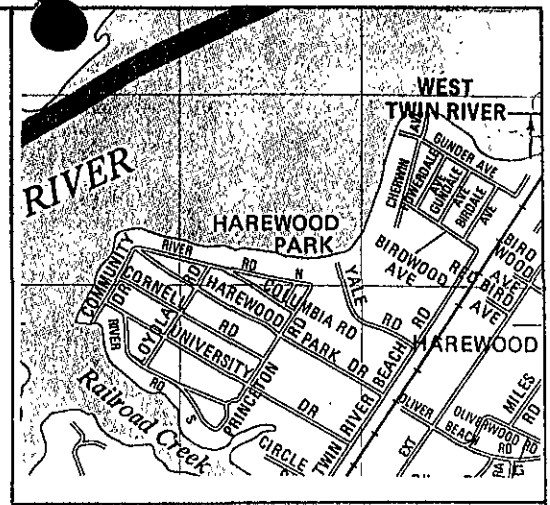
Width:
30'-4"

Depth:
42'-8"



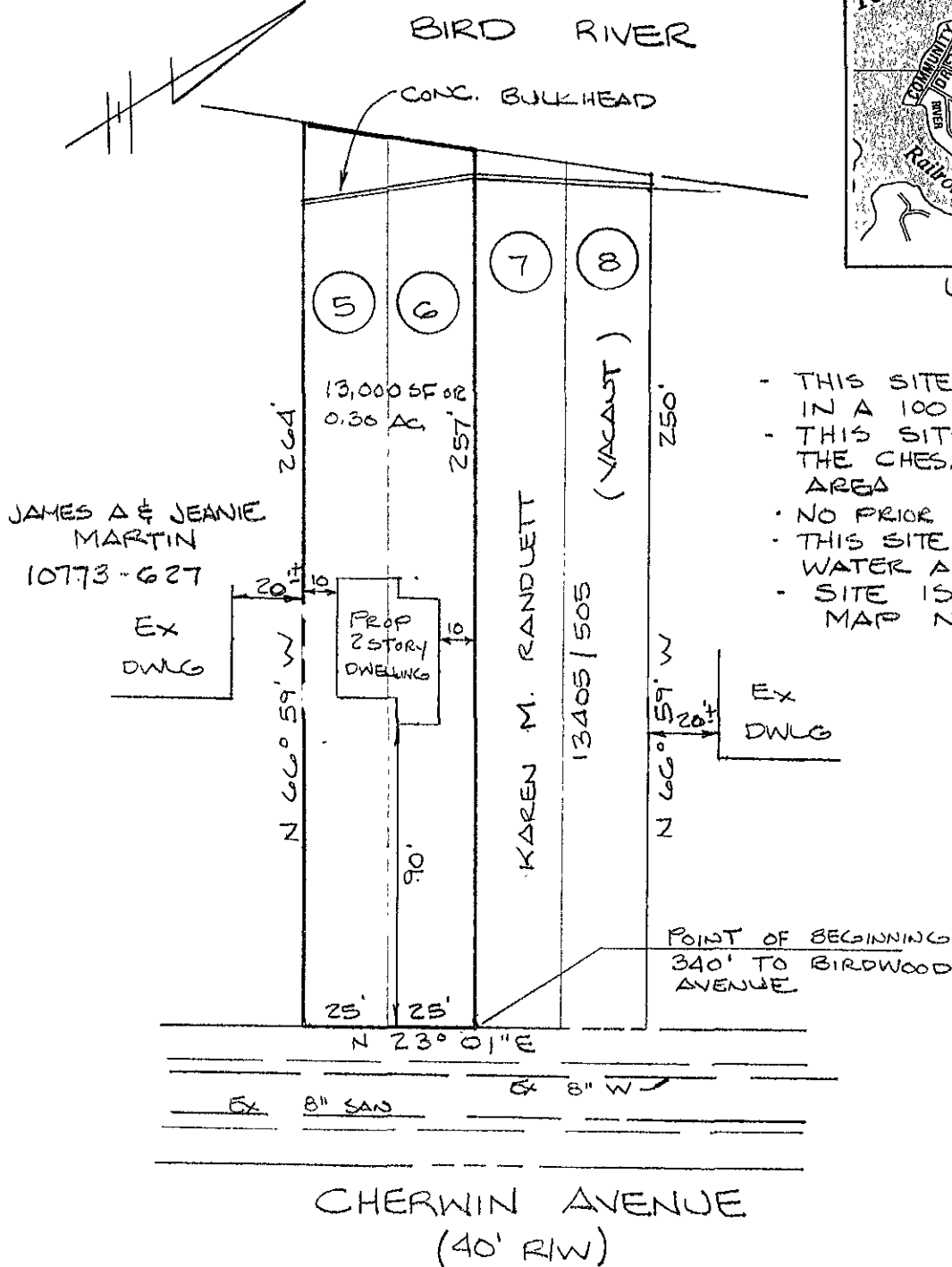
© 1998 Donald A. Gardner, Inc.

A coastal home, this plan features a super-slim design for very narrow lots. First- and second-floor porches maximize waterfront views. Windows in both the two-story great room and the dining room also emphasize the views. A large kitchen serves everyone easily and offers plenty of counter and cabinet space. A powder room and a study or extra bedroom complete the first floor. The master suite, with private bath and huge walk-in closet, is upstairs as is another bedroom and full bath.



LOCATION MAP
SCALE 1"=2000'

- THIS SITE IS LOCATED IN A 100 YEAR FLOOD PLAIN
- THIS SITE IS LOCATED IN THE CHESAPEAKE BAY CRITICAL AREA
- NO PRIOR ZONING HISTORY
- THIS SITE IS SERVED BY PUBLIC WATER AND SEWER
- SITE IS ZONED DR 5.5 MAP NE 8 M



Ref No 1

PLAN TO ACCOMPANY
ZONING VARIANCE
13108 CHERWIN AVENUE
15th ELECT DIST. 5th COUNCILMANIC DIST.
PLAT 9/33
" TWIN RIVER BEACH SECTION A "
SCALE 1"=50'



W. DUVALL & ASSOCIATES, INC.
ENGINEERS, SURVEYORS, LAND PLANNERS
530 EAST JOPPA ROAD
TOWSON, MARYLAND 21286
TEL. (410) 583-9571
FAX (410) 583-1513

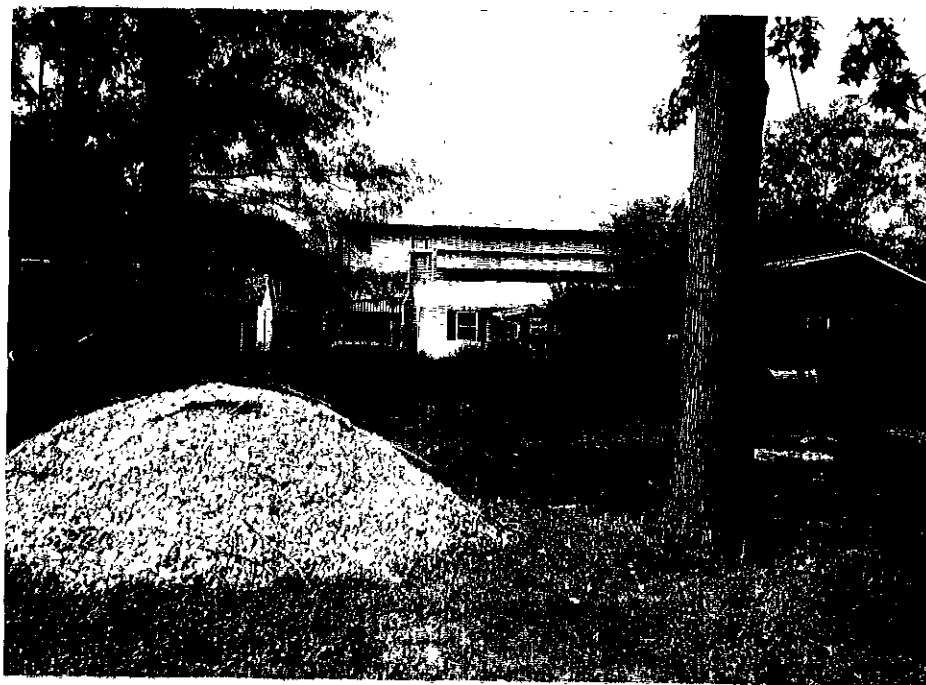
01-020A



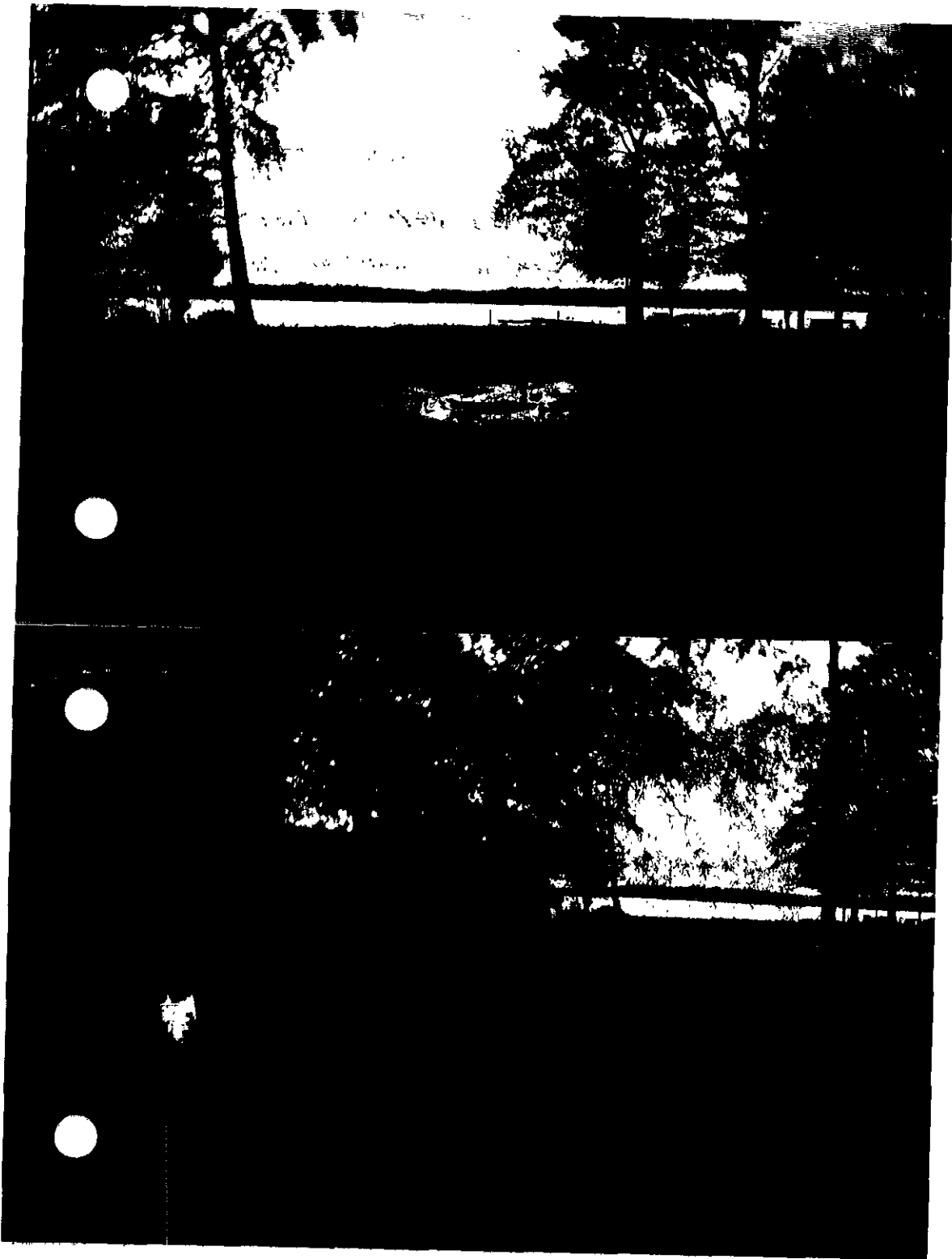
01-020-A



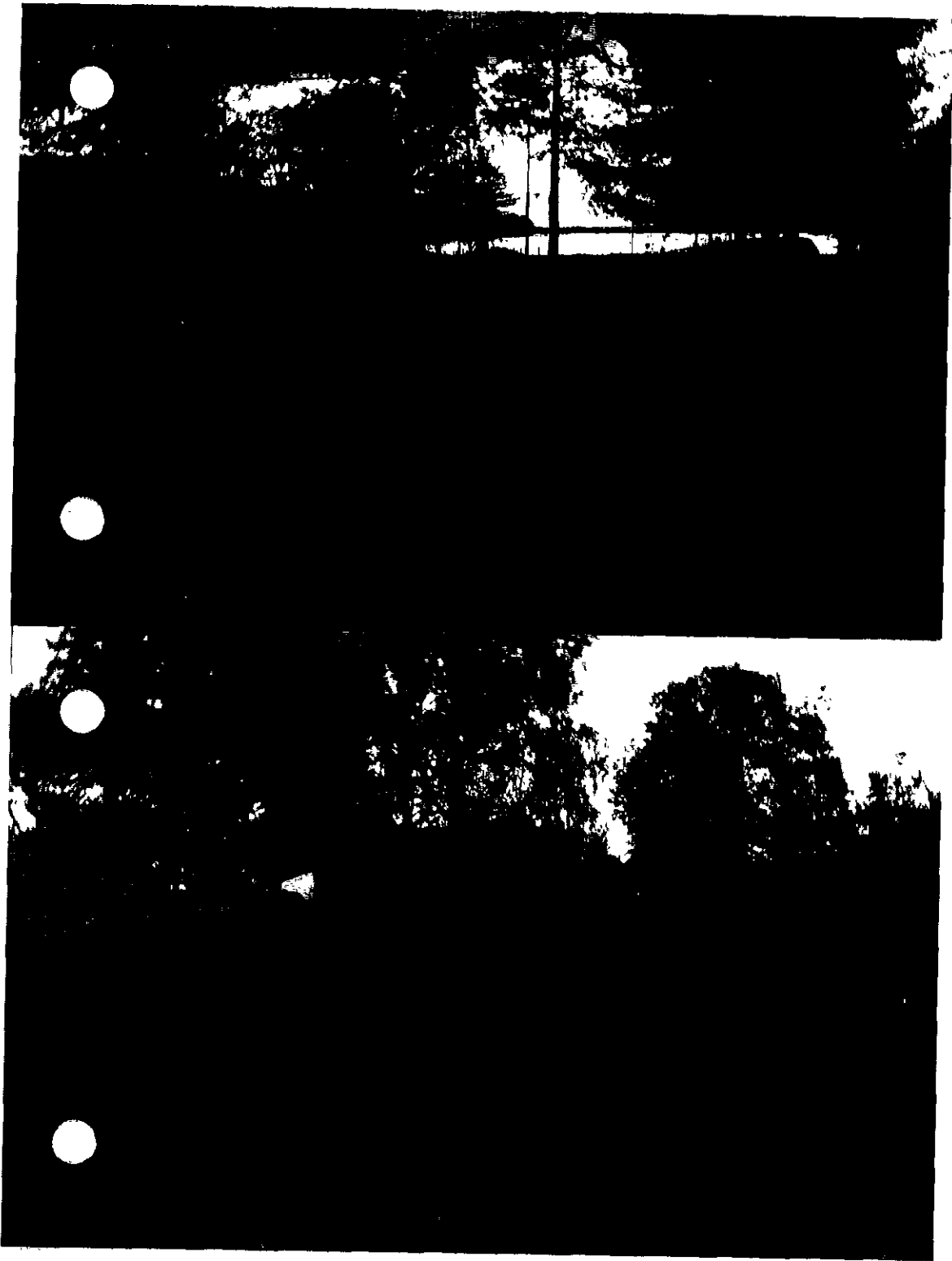
01-020-A

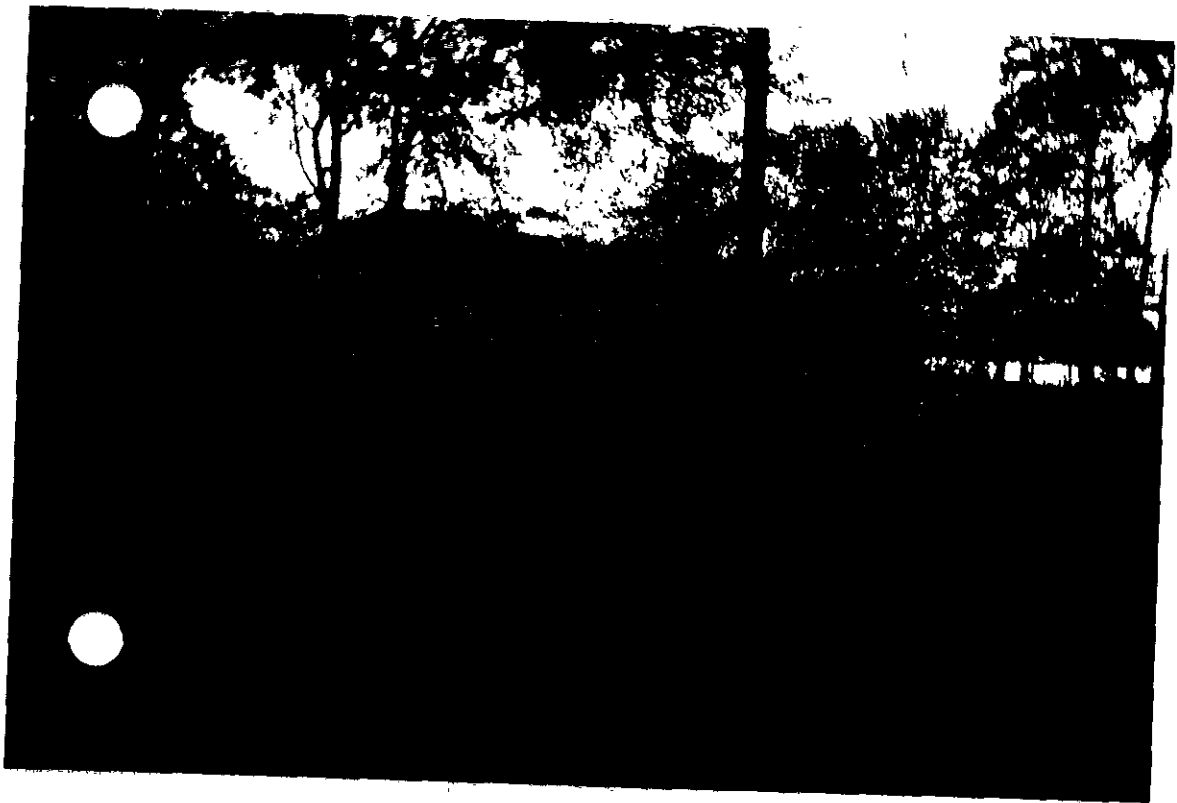


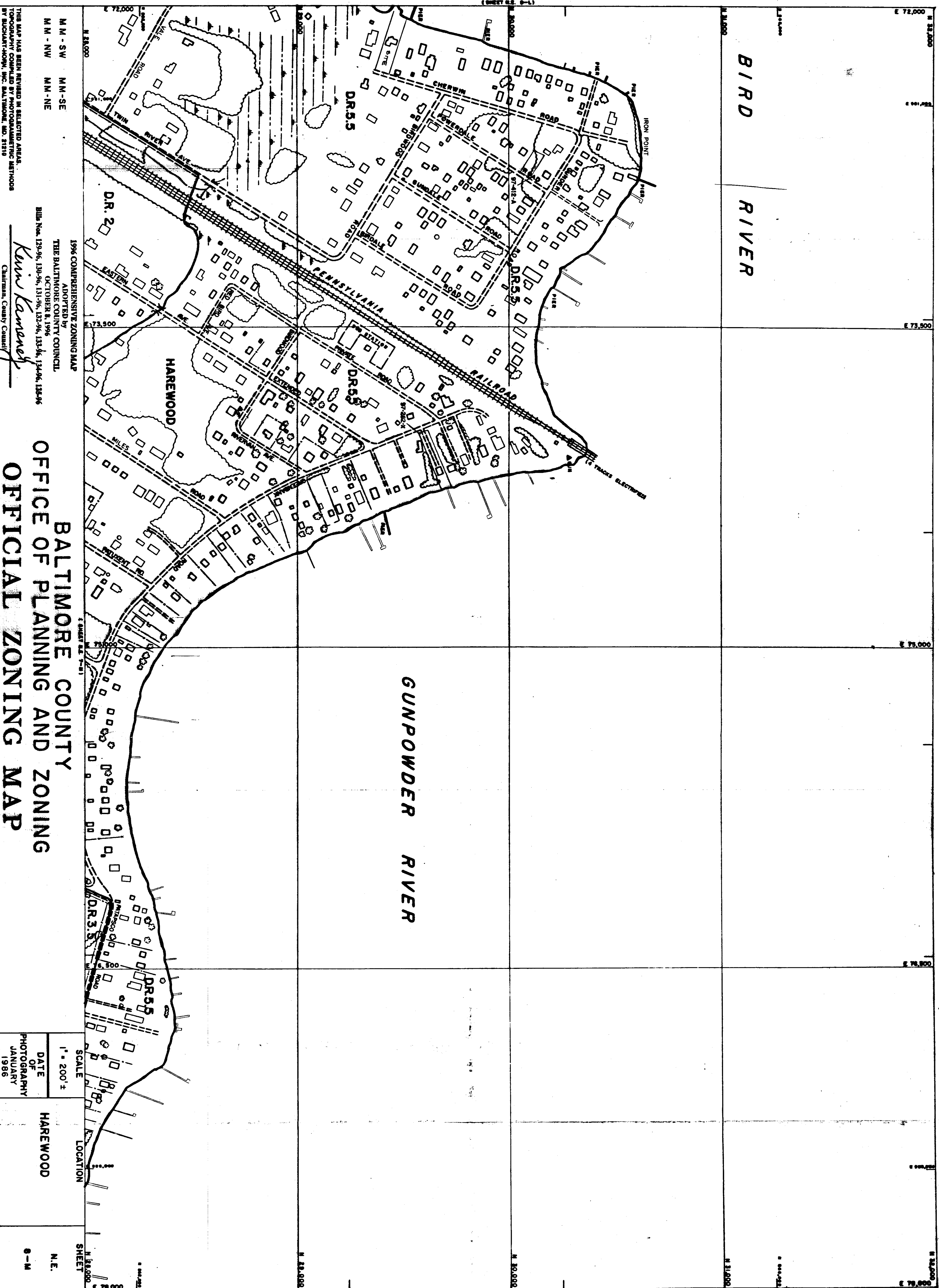
01-020-A











NE 8-M

TO: PATUXENT PUBLISHING COMPANY
Thursday, August 17, 2000 Issue – Jeffersonian

Please forward billing to:

Keith Randlett
c/o Remax Realty
7939 Honeygo Boulevard
Suite 127
Baltimore, MD 21236

410-931-9200

NOTICE OF ZONING HEARING

The Zoning Commissioner of Baltimore County, by authority of the Zoning Act and Regulations of Baltimore County, will hold a public hearing in Towson, Maryland on the property identified herein as follows:

CASE NUMBER: 01-020-A

13108 Cherwin Avenue

W/S Cherwin Avenue, 340' SW of Birdwood Avenue

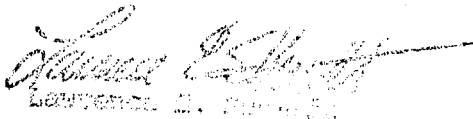
15th Election District – 5th Councilmanic District

Legal Owner: Karen Marie Randlett

Contract Purchaser: Allison Martin & Anthony Krasdauskis

Variance to permit a lot width of 50 feet in lieu of the required 55 feet and to approve an undersized lot and any other variances deemed necessary by the zoning commissioner.

HEARING: Tuesday, September 5, 2000 at 11:00 a.m. in Room 407, County Courts Building, 401 Bosley Avenue



LAWRENCE E. SCHMIDT
ZONING COMMISSIONER FOR BALTIMORE COUNTY

- NOTES: (1) HEARINGS ARE HANDICAPPED ACCESSIBLE; FOR SPECIAL ACCOMODATIONS, PLEASE CONTACT THE ZONING COMMISSIONER'S OFFICE AT 410-887-4386.
- (2) FOR INFORMATION CONCERNING THE FILE AND/OR HEARING, CONTACT THE ZONING REVIEW OFFICE AT 410-887-3391.