

2/26/10
IN THE MATTER OF
ROBERT L. AND ASTRA BRANTLEY
PETITIONER/LEGAL OWNER

14821 Hanover Pike
Upperco, MD 21155
4th Election District, 3rd Councilmanic District

RE: Petition for Special Hearing, Special Exception

* BEFORE THE
* COUNTY BOARD OF APPEALS
* OF
* BALTIMORE COUNTY
* Case No. 09-042-SPHX

* * * * *

OPINION

This case comes to the Board on appeal of the final decision of the Zoning Commissioner of Baltimore County under the Baltimore County Zoning Regulations (BCZR) Section 1A01.2.C(4), (6) & (23), for use of an existing building for religious worship, school and camp as a spiritual religious retreat center, which the Zoning Commissioner denied, as well as the final decision on the Petition for Special Hearing to approve a modified parking plan, pursuant to 409.12 of the BCZR, which was dismissed as moot.

A *de novo* public hearing was held before this Board on October 14, 2009. The Petitioner appeared before the Board *pro se*. The Protestants, Patricia R. Fallon and Barbara D. Ambrose, were represented by J. Carroll Holzer, Esquire. A Public Deliberation was held immediately after the hearing of the case by the Board.

Factual Background

At the outset, Petitioners, abandoned their request to use the subject property for worship, school, and a camp. They maintained however, their request for Special Exception approval of the religious retreat center and the Special Hearing request for the modified parking plan.

Testimony and Evidence

Robert L. Brantley, Petitioner, testified on his own behalf. He described the three (3) acres of the subject property as well as the services provided there by him and his wife. He

discussed their use of the internet as well as their general marketing plans and process. He described himself and his wife as "counselors"; he noted that he is a clergyman and financial advisor, while his wife is a clinical physiologist.

He related the services performed by them at the subject location, stating that although they were not a church, they nevertheless worked to bring "reconciliation" to couples and small groups. He further noted that they do in fact, hold occasional prayer meetings as part of these activities.

He described his wife's practice, relating her office hours of 9:00 a.m. to 8:00 p.m., and observing that the maximum number of people seen by her each week was approximately twenty (20) in number.

He testified that he primarily traveled to his clients, but that there was parking at the subject site for approximately twenty (20) vehicles on a gravel lot. In conclusion, he explained that there functioning retreat center was a quiet, confidential place to escape the problems of life; and receive "quite professional" help and mediation services among the beauty of nature, primarily on walking pads and sitting areas throughout the property.

Astra Brantley testified briefly on her own behalf to confirm primarily the testimony of her husband. She described her practice and observed they often carried out their activities and counseling services while walking the property with her patience.

Decision

The Board will not address the relief originally requested by Petitioners relating to the use of the subject site for religious worship, a school and a camp, as these requests were withdrawn by Petitioners at the hearing before the Board.

The remaining Special Exception request for religious retreat center is governed by the rather lengthy and detailed requirements set out in Section 502.1 of the BCZR. That sections reads as follows:

§502.1—Before any Special Exception may be granted, it must appear that the use for which the Special Exception is requested will not:

- A. Be detrimental to the health, safety, or general welfare of the locality involved;
- B. Tend to create congestion in roads, streets or alleys therein;
- C. Create a potential hazard from fire, panic or other dangers;
- D. Tend to overcrowd land and cause undue concentration of population;
- E. Interfere with adequate provisions for schools, parks, water, sewerage, transportation or other public requirements, conveniences, or improvements;
- F. Interfere with adequate light and air;
- G. Be inconsistent with the purposes of the property's zoning classification nor in any other way inconsistent with the spirit and intent of these Zoning Regulations;
- H. Be inconsistent with the impermeable surface and vegetative retention provisions of these Zoning Regulations; nor
- I. Be detrimental to the environmental and natural resources of the site and vicinity including forests, streams, wetlands, aquifers and floodplains in an R.C. 2, R.C. 4, R.C. 5 or R.C. 7 Zone.

Petitioners failed to address any of the above requirements, either in their testimony or through one or more expert witnesses. Accordingly, there is no basis for the Board to grant the request Special Exception relief.

As a result of the failure to secure the requested Special Exception, the Special Hearing relief for a modified parking plan is rendered moot. It should be noted however, for the record, that Petitioners also failed to address in any way the requirements for a Special Hearing as to

parking set out in Section 409.12 of the BCZR, by way of the requirements of Section 409.8(a) and (b) of the BCZR.

Accordingly, the Board unanimously denies Petitioners request for Special Exception relief and determines that the Petition for Special Hearing for a modified parking plan is therefore rendered moot.

ORDER

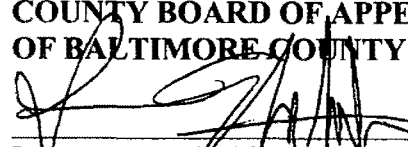
THEREFORE, IT IS THIS 26th day of March, 2010, by the County Board of Appeals of Baltimore County

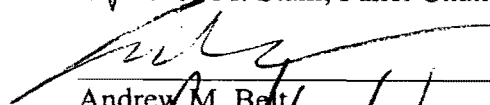
ORDERED that the Petition for Special Exception for use of an existing building for religious worship, school and camp as a spiritual religious retreat center per Baltimore County Zoning Regulations Section 1A01.2.C(4), (6) & (23), as amended at the hearing before the Board of Appeals on October 19, 2009 in case number 09-042-SPHX, be and the same is hereby **DENIED**; and it is further,

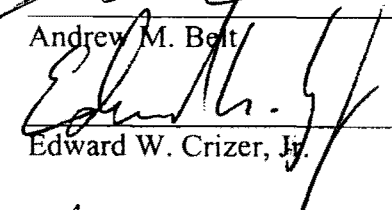
ORDERED that the Petitioner's request for Special Hearing to approve a modified parking plan pursuant to 409.12 of the Baltimore County Zoning Regulations, be and is hereby **DISMISSED AS MOOT**.

Any petition for judicial review from this decision must be made in accordance with Rule 7-201 through Rule 7-210 of the *Maryland Rules*.

**COUNTY BOARD OF APPEALS
OF BALTIMORE COUNTY**


Lawrence M. Stahl, Panel Chair


Andrew M. Belt


Edward W. Crizer, Jr.



County Board of Appeals of Baltimore County

JEFFERSON BUILDING
SECOND FLOOR, SUITE 203
105 WEST CHESAPEAKE AVENUE
TOWSON, MARYLAND, 21204
410-887-3180
FAX: 410-887-3182

March 26, 2010

Robert and Astra Brantley
14821 Hanover Pike
Upperco, MD 21155

J. Carroll Holzer, Esquire
508 Fairmount Avenue
Towson, MD 21286

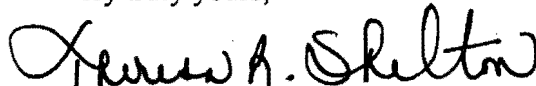
RE: *In the Matter of: Robert Brantley / 14821 Hanover Pike*
Case No.: 09-042-SPHX

Dear Mr. and Mrs. Brantley and Mr. Holzer:

Enclosed please find a copy of the final Opinion and Order issued this date by the Board of Appeals of Baltimore County in the above subject matter.

Any petition for judicial review from this decision must be made in accordance with Rule 7-201 through Rule 7-210 of the *Maryland Rules*, **with a photocopy provided to this office concurrent with filing in Circuit Court. Please note that all Petitions for Judicial Review filed from this decision should be noted under the same civil action number.** If no such petition is filed within 30 days from the date of the enclosed Order, the subject file will be closed.

Very truly yours,


Theresa R. Shelton
Administrator

/trs

Duplicate Original

Enclosure: Opinion

c (w/Encl): Patricia R. Fallon
Barbara D. Ambrose

Michael Mohler, Deputy Director/Code Enforcement
Margaret Ferguson, Code Enforcement Hearing Officer
People's Counsel for Baltimore County
William Wiseman, III, Zoning Commissioner
Timothy Kotroco, Director/PDM
Arnold F. "Pat" Keller, Director/Planning
Nancy West, Assistant County Attorney
John E. Beverungen, County Attorney

4/6/09
PETITION OF: ROBERT BRANTLY, ET UX
PETITIONS FOR SPECIAL EXCEPTION &
SPECIAL HEARING

(14821 Hanover Pike)

E/S Hanover Pike, 4,900' S c/line of Emory Road

4th Election District

3rd Councilmanic District

Case No.: 2009-0042-SPHX

* BEFORE THE
* BALTIMORE COUNTY
* BOARD OF APPEALS

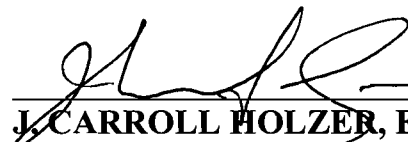
*
*
*

* * * * *

INTENTION TO PARTICIPATE

Respondents, **Patricia R. Fallon & Barbara D. Ambrose**, by and through their attorney, **J. Carroll Holzer, Esquire** herewith file their intention to participate in the above-captioned matter before the County Board of Appeals. Please direct all notices, correspondence and any pleadings to undersigned counsel.

Respondents fully participated in the proceedings below.


J. CARROLL HOLZER, Esquire
Holzer & Lee
508 Fairmount Avenue
Towson, Maryland 21286
410-825-6961
Attorney for Respondents

RECEIVED

APR 06 2009

BALTIMORE COUNTY
BOARD OF APPEALS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of April, 2009, a copy of the foregoing Intention to Participate was mailed first class, postage pre-paid to the following: Sebastian Cross, Esquire, Gildea and Schmidt, LLC, 600 Washington Avenue, Suite 200, Towson, MD, 21204; and Peter Max Zimmerman, Esquire, People's Counsel for Baltimore County, 105 W. Chesapeake Ave., Room 204, Towson, MD 21204.



J. CARROLL HOLZER, Esquire

4/1/09

IN RE: PETITION FOR SPECIAL HEARING
AND SPECIAL EXCEPTION

E/S Hanover Pike, 4,900' S c/line of
Emory Road
(14821 Hanover Pike)

4th Election District
3rd Council District

Robert L. Brantley, et ux, Petitioners
Before the Zoning Commissioner for
Baltimore County
Case No.: 2009-0042-SPHX

BEFORE THE

BALTIMORE COUNTY

BOARD OF APPEALS

Case No.:

RECEIVED
APR 01 2009

* * * * *

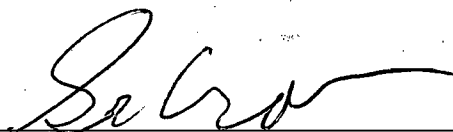
PETITION FOR APPEAL

Robert Brantley and Astra Brantley, Petitioners in the above captioned matter, by and through their attorneys, Sebastian A. Cross and Gildea & Schmidt, LLC, file this Petition for Appeal, pursuant to Baltimore County Charter Section 602, and states as follows:

1. The subject property is located at 14821 Hanover Pike in Baltimore County.
2. The Petitioner filed a request for special hearing pursuant to Section 500.7 of the Baltimore County Zoning Regulations ("BCZR") to approve a modified parking plan and a special exception pursuant to BCZR §§ 1A01.2.C(4), (6) and (23) to use an existing building for religious worship, school and camp as a spiritual religious retreat center.
3. On March 3, 2009, the Zoning Commissioner for Baltimore County denied the petition for special exception and dismissed the petition for special hearing as moot.
4. The Zoning Commissioner erred in denying the relief requested by the Petitioner.

WHEREFORE, the Petitioner hereby appeals the Zoning Commissioner's Findings of Fact and Conclusions of Law in the above captioned matter for the reasons set forth herein and to be presented at the de novo hearing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Se Cross', written over a horizontal line.

Sebastian A. Cross
Gildea & Schmidt, LLC
600 Washington Ave., Suite 200
Towson, MD 21204
(410) 821-0070

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 1st day of April, 2009, a copy of the foregoing Petition for Appeal was mailed, first class, postage prepaid, to: J. Carroll Holzer, Esquire, Holzer & Lee, 508 Fairmount Avenue, Towson, MD 21204.



Sebastian A. Cross

3/3/09

IN RE: PETITIONS FOR SPECIAL HEARING	*	BEFORE THE
AND SPECIAL EXCEPTION		
E/S Hanover Pike, 4,900' S c/line of	*	ZONING COMMISSIONER
Emory Road		
(14821 Hanover Pike)	*	FOR
4 th Election District	*	BALTIMORE COUNTY
3 rd Council District		
	*	Case No. 2009-0042-SPHX
Robert L. Brantley, et ux		
Petitioners	*	

* * * * *

FINDINGS OF FACT AND CONCLUSIONS OF LAW

This matter comes before the Zoning Commissioner for consideration of Petitions for Special Hearing and Special Exception filed by Robert Brantley, and his wife, Astra P. Brantley, legal owners, through their attorney, Sebastian A. Cross, Esquire. The Petitioners request a Special Hearing, pursuant to Section 500.7 of the Baltimore County Zoning Regulations (B.C.Z.R.), to approve a modified parking plan as provided for in Section 409.12 of the B.C.Z.R. In addition, special exception relief is requested pursuant to B.C.Z.R. Sections 1A01.2C(4), (6) and (23) in order to use an existing building for religious worship, school and camp as a spiritual religious retreat center. The subject property and requested relief are more particularly described on the site plan, which was accepted into evidence and marked as Petitioners' Exhibit 2.

Appearing at the requisite public hearing in support of the requests were Robert Brantley, property owner, and Matthew T. Allen, a Professional Engineer, with Bohler Engineering, P.C. As noted above, the Petitioners were represented by Sebastian A. Cross, Esquire of Gildea & Schmidt, LLC. The issues presented in this case generated significant public interest, and a number of individuals from the surrounding community appeared and/or testified in opposition to the request, namely S. Glenn Elseroad, George P. Neubeck, Jr., an officer of the Hanover Road Association, Carol D. Isaac, Sandra M. Brown, Robert Slaterbeck, Charlotte Coarts, Charlene L. Hughes, John R. Lorenz, Paul R. and Frances C. Joyce. J. Carroll Holzer, Esquire

RECEIVED FOR FILING
Date 3-3-09
By [Signature]

appeared as attorney for the adjoining property owner, Patricia R. Fallon, and Barbara D. Ambrose.

By way of background, the property referred to as Near Haven at 14821 Hanover Pike in the Upperco area of northern Baltimore County has been the subject of Code Enforcement actions pursuant to Section 3-6-205 of the Baltimore County Code (B.C.C.). It is the activities generated by uses other than those normally associated with a single-family dwelling, which is the subject of the instant request. In this regard, the County Enforcement Hearing Officer, on June 24, 2008, ordered the Petitioners that "there shall be no activities allowed on the subject site except for those associated with single-family dwelling uses." Aggrieved by this decision, the Brantley's retained Counsel and now seek a determination that the uses they propose are permitted within the zone.

An extensive volume of testimony and evidence was offered by both sides over the two (2) hearing dates, namely September 24, 2008 and February 25, 2009. Due to limitations of time and space, it is impossible to repeat all of the testimony offered herein. Additionally, there were numerous documents, photographs, plats, written memoranda, and other exhibits entered into the record of this case. I shall summarize only the relevant evidence presented.

The subject property is a rectangular shaped parcel (147' wide x 871' deep) containing 2.95 acres on the east side of Hanover Pike (MD Route 30), just south of Old Hanover Road and zoned R.C.2. This lot, identified on Maryland Tax Map 31 as Parcel 353, was created in 1998 through a Minor Subdivision of a 6-acre tract by Joan Morgan.¹ The subject property was purchased from Ms. Morgan by Craig Garrett, who built a two-story, cape code, single-family dwelling that was centrally located on the property. He took great pride in landscaping the lot

¹ The remaining 3.05-acre parcel, 14823 Hanover Pike, identified on Maryland Tax Map 31 as Parcel 150, is on the north side of the common boundary line and was purchased by Patricia Fallon in November 1998. Ms. Fallon, one of the Protestants here, observed as Mr. Garrett built his home and measured the distance between the two (2) homes (foundation to foundation) as being 75 feet.

RECEIVED FOR FILING
Date 3-3-09
By [signature]

placing evergreen trees in the side yards, gardens in the rear yard and a fruit orchard between the front of the house and Hanover Pike. Due to the narrowness of the property, Mr. Garrett filed a Petition for Variance, Case No. 00-284-A. This was done to allow an addition (garage) to be built on the south side of the house. Then Deputy Zoning Commissioner Timothy M. Kotroco, by his Order dated February 4, 2000, granted the variance allowing a side yard setback of 3 feet in lieu of the minimum required 35 feet. Inherent in the relief granted was the Order's restriction that "the Petitioner or subsequent owners shall not allow or cause the garage to be converted to a second dwelling unit and/or apartment." The Petitioners, Robert and Dr. Astra Brantley, purchased the property from Mr. Garrett in September 2004. The property, which they would name "Near Haven", was bought in large part due to its "perfect setting" that they believed would provide an environment for psychological, spiritual and whole health services that they intended to offer to their clients. They advertise Near Haven as being fronted by fruit orchards; the 3-acres features a prayer garden, a meditative walking labyrinth, and an organic vegetable garden in the rear. Mr. Brantley described the property as being distinguished from others by virtue of its symphony of decorative flowers and shrubbery that are frequently visited by local birds and exotic butterflies. He plans for small groups (between two [2] and ten [10]) to use the home as a sanctuary for religious and spiritual retreats. He discussed the need to provide Christian counseling and guidance to clergy, church members and families on central issues in their lives, be it personal or financial. Testimony and evidence indicates that the "existing building for religious worship" referred to in the Petition for Special Exception is the accessory addition (garage) involved in Case No. 00-284-A and now referred to by the Petitioners and their engineer as the "in-law attachment/Living Well Suite" and shown on the site plan (Petitioners' Exhibit 2) as a "proposed church" (25 people).

Robert Brantley testified that he is an ordained Minister of the Gospel of Jesus Christ with 25 years of experience as a strategic planner in management and financial planning holding

RECEIVED FOR FILING
Date 3-13-09

a B.S. degree in Business and Economics from Illinois College and an M.B.A. degree from the Northwestern University. Astra Brantley, a licensed Clinical Psychologist, holds a B.A. degree in Psychology from DePaul University, an M.S. Ed. degree in Guidance and Counseling from Chicago State University and a Doctor of Psychology degree from Central Michigan University and a member of the American Association of Christian Counselors. The subject property (14821 Hanover Pike) functions as the Brantley's home and is listed by the Department of Assessments and Taxation's Charter Division as the business location for "*The Brantley Group*", providing Christian Management and Mental Health Services; "*Bridge Point Ministries*", providing Christian, Bible-based, Christ-centered, spirit-led ministry; "*The Brantley Group, LLC*" – to engage in any lawful activities permitted by a Limited Liability Company organized under the laws of the State of Maryland; the "*Justice University Foundation, Inc.*" – to fund global efforts, educating people toward transforming imperfect social systems into structures of justice; and "*The Universal Peacemakers Foundation, Inc.*"² There was controversy between the Petitioners and Protestants over the extent of *actual* collaborative services being provided for at the site by the Petitioners (and their contract providers – i.e., acupuncture, massage therapy, etc.) and a lengthy list of *other* advertised services. See Protestants Exhibits 1 through 16.

Mr. Allen, accepted as an expert in the field of civil engineering and zoning, testified that he was retained by the Brantleys to prepare the site plan, review the deed and zoning on the property, conduct a site visit, prepare an aerial overlay photographic exhibit (Petitioners' Exhibit 1) and determine, after talking with Mr. Brantley, Managing Director of the Brantley Group, what was being proposed at the site. He opined that what was being considered was a spiritual religious retreat or center that is not defined in the definitional section of the B.C.Z.R. He

² Multiple entities providing a variety of services from one location can be problematic and tortuous from a zoning enforcement perspective. See, for example Case No. 07-205-SPH with its associated litigation.

ORIGINAL REQUIRED FOR FILING
Date 3-3-09
By [signature]

testified that he broke down the activities conducted at this site over the past four (4) years and determined that they equate or share characteristics of a church or other building for religious worship, camps, including day camps and schools similar to what was allowed under B.C.Z.R. Section 1A01.2(C) by special exception in the Loyola College case that involved 53 acres of R.C.2 land in northern Baltimore County. *See People's Counsel for Baltimore County v. Loyola College in Maryland*, 406 Md. 54 (2008). In his opinion, the subject property is in a relatively rural area. Although residential homes and uses are located along Hanover Pike to the north and south of the subject property, it is otherwise surrounded to the east by Dale Trump's black angus cattle farm and the farm property of Glenn Elseroad. To the west, on the opposite side of Md. Route 30, is the 100-acre Brathuhn Farm. It was Mr. Allen's opinion that since the site is very open with significant vegetation along the property lines and no structural changes contemplated at the site, that the requested special exception use will not have a detrimental impact upon the health, safety, and general welfare of the locale. He then addressed drive aisle and parking requirements for religious worship (one space for every four [4] seats – 25 seats proposed equals seven [7]) plus two (2) required parking spaces for residential use. In Mr. Allen's opinion, seven (7) parking spaces were adequate as the B.C.Z.R. contains no parking requirements for the associated camp activities.

Special exception uses are regulated in the B.C.Z.R. under Section 502.1 thereof. Due to the importance of that Section, it will be recited here:

"Before any special exception may be granted, it must appear that the use for which the special exception is requested will not:

- A) be detrimental to the health, safety or general welfare of the locality involved;
- B) tend to create congestion in roads, streets or alleys therein;
- C) create a potential hazard from fire, panic or other danger;
- D) tend to overcrowd land and cause undue concentration of population;

RECEIVED FROM FILING
Date 3-3-09
BY 93

- E) interfere with adequate provisions for schools, parks, water, sewerage, transportation or other public requirements, conveniences or improvements;
- F) interfere with adequate light and air (Bill No. 45-1982);
- G) be inconsistent with the purposes of the property's zoning classification nor in any other way inconsistent with the spirit and intent of these zoning regulations (Bill No. 45-1982);
- H) be inconsistent with the impermeable surface and vegetative retention provisions of these zoning regulations; nor (Bill No. 45-1982)
- I) be detrimental to the environmental and natural resources of the site and vicinity including forests, streams, wetlands, aquifers and floodplains in an R.C.2, R.C.4, R.C.5 or R.C.7 zone (Bill No. 74-2000)."

The highest courts of this State have reviewed the treatment of proposed special exception and conditional uses by various local zoning boards and commissions. The seminal case regarding special exceptions is *Shultz v. Pritts*, 291 Md. 1 432 A2d 1319 (1981). In that case, the Court noted that a special exception use is part of the comprehensive zoning plan and thus, shares the legal presumption that it is in the interest of the general welfare and therefore valid. The Court noted that a special exception use is a valid zoning mechanism that delegates to an administrative board or body a limited authority to allow certain enumerated uses which the legislature (in this case, the Baltimore County Council) has determined to be permissible, absent any facts or circumstances which negate that presumption.

The Court further noted that the applicant for a proposed special exception use does not have the burden of establishing affirmatively that the proposal would be of benefit to the community. Moreover, the test is not whether another use is more preferable or whether the property could be used for a higher or better purpose. Rather, the test to be considered by the local administrative body (Zoning Commissioner) is whether the neighboring properties in the general neighborhood would be adversely affected and whether the proposed use in this particular case is in harmony with the general purposes and intent of the underlying zoning scheme.

COPIES REQUIRED FOR FILING
Date 3-3-89
By [signature]

The Court of Appeals of Maryland further explained the special exception test in *Mossberg v. Montgomery Co.*, 329 Md. 494, 620 A2d 886 (1993). In that case, an applicant sought approval for a solid waste transfer station in Montgomery County. That use was a conditional/special exception use under the relevant Montgomery County ordinance. In its written opinion, the Court noted that there were certain inherent negative uses associated with any solid waste transfer station. For example, such a station would be expected to produce traffic, noise, dust, etc. Moreover, it could be presumed that such impacts would negatively affect surrounding properties. However, although such presumptions are valid, the Court emphasized that the existence of these impacts did not provide a sufficient basis for the local administrative body to deny the Petition for Special Exception. Instead, the Court reasoned *that the local body must show that those impacts are greater at the subject location than would normally be associated with such use*. That is, the criteria is not whether the proposed use carries with it adverse impacts (such adverse impacts are assumed in the first instance by designating the use a special exception rather than by right). Rather, the test is whether that impact at the subject property will produce effects above and beyond those normally inherent with such a use if located anywhere else within the same zoning district. Therefore, in considering the present application, it is not enough to simply conclude that the proposed religious retreat center with its associated school and camp will produce noise, traffic and the site of additional cars parked around the Brantley residence that could adversely affect the neighborhood. It most certainly will, and such an effect is inherent in any religious worship activity as contemplated here. The real standard as recently explained by our highest Court in *People's Counsel v. Loyola, supra* is whether the mixed use of a church, school, camp, religious retreat, and other advertised private services within the Resource Conservation Zone at this location would cause adverse effects upon adjoining and surrounding properties that are unique

RECEIVED FOR FILING
Date 3-3-99
By [signature]

and different, in kind or degree, than those inherently associated with such a use regardless of its location. In other words, would these adverse effects cause a real detriment to the neighborhood.

As noted above, numerous individuals appeared in opposition to the request. Testifying in Mr. Holzer's case against the requested relief were Barbara D. Ambrose, George P. Neubeck, Jr., S. Glenn Elseroad, Sandra M. Brown and Patricia R. Fallon. These witnesses each offered their own individual testimony, but the clear tenor and theme of their remarks was that the Petitioners should not be granted special exception or conditional use approval to operate a religious retreat and other private practices on such a narrow lot, as the operation would be clearly visible and a detriment to the general welfare of the community and adjacent residences. Ms. Ambrose utilized a power point presentation (Protestants Exhibit 3) to show a number of adverse affects upon adjoining property values including the following: impacts on septic field capacity, inadequate access for emergency response vehicles, parking of vehicles on neighboring land and lawn areas (traffic issues), documentation for internet advertisement of 20 services (See Protestants Exhibits 3 and 5), camping activities outside of Near Haven boundaries, placement of tents and spot-a-pots along adjacent property boundary lines, etc. She testified that these impacts are particularly severe here, due to the proximity of her home 35 feet away. Similarly, Mr. Neubeck stated that the proposed activities were considered by the Hanover Road Association membership and found to be incompatible and inconsistent with the Association's Community Plan and the Hanover Corridor Study. He thought the uses would exploit the area and would be difficult, if not impossible to control. Mr. Elseroad, a community leader and past-President of the Hanover Road Association, gave testimony that encompassed a broad overview as to the reasons he and the community are recommending against approval of this special exception. The proposed activities that would be repeated week after week, month after month, on a lot size and configuration that is 147 feet wide would certainly infringe upon the neighboring property values and affect the quality of life of those in close proximity. By way of example, he explained that

RECEIVED FOR FILING
Date 3-2-09
BY [signature]

while on his farm, behind the Trump farm, he hears noise, sees lights, tents, and the spot-a-pots next to the Trumps beautifully maintained property. He also stated that based on his personal experience with religious faith-based groups and given the extent of advertisement generated by the Brantley Group, he projects rapid expansion of the Bridge Point Ministries that will lead to more problems. Finally, Sandra Brown and Patricia Fallon gave corroborating testimony and opinions that the advertised activities, are of a business nature rather than church counseling. Ms. Brown, a beautician, whose home, also on R.C.2 land a half mile away, finds it disturbing that she is prohibited from operating a beauty salon from her residence, while the Brantleys advertise a host of business activities, which she states are disguised as pastoral destinations.

In rebuttal, Mr. Cross questioned, to no avail, the witnesses as to the feasibility of entering into an agreement or formal covenants with the Hanover Road Association and neighbors that would limit Petitioners activities and use of the property. Mr. Elseroad stated that while the Hanover Road Association is usually amenable to an amicable resolution, he did not believe that it was possible or practical to enforce the number of people or activities allowed on private property. He stated normally what happens is the community ultimately ends up with the burden of being required to enforce the limitations imposed.

As noted in the discussion above regarding the law of special exceptions, the undersigned is required to focus upon the impacts of the proposed use and how they particularly affect the locality involved. The undersigned has reviewed the proposal in that light, and I find that the Special Exception request has failed to meet the test set out in B.C.Z.R. Section 502.1.A & I. There are two (2) factors that justify this conclusion. First, in this instance a religious business retreat with its accompanying indoor and outdoor activities at this location will be detrimental to the health, safety and general welfare of the locality involved based on the evidence received. The number of advertised services "holistic clinical services, acupuncture therapy, massage therapy, acoustic therapy, mediation training, personal fitness training, stress self defense,

RECEIVED FOR FILING
Date 3-3-09
By [signature]

financial and estate planning, annual Christian children's camps, spa days, pastoral counseling, holistic health training, labyrinth medication, conference center", etc. are clearly excessive for this narrowly configured 3-acre R.C.2 site. It is clear, based on the testimony received that the Community does not need an additional spiritual retreat which will not serve the local residents. The Hanover Road Association is convinced this type of activity will be detrimental to their Community Plan and the Hanover Corridor Study that have been prepared for this section of Maryland Route 30 and would negatively impact not only on the residential community but also the existing business community. Further, it would have contradictory impacts upon the Hanover Pike Streetscape as the activities with attendant automobile parking are visible from the public right-of-way and aesthetically not compatible with the single-family dwelling use in this resource conservation classification.

Second, Mr. Elseroad and others testified that the front or western portion of the property is impacted by the 100-year flood plain and the Department of Environmental Protection and Resource Management (DEPRM) has raised issues of impacts upon the existing well and septic systems on the property. Mr. Elseroad and Ms. Ambrose testified as to specific septic failures in the area and at the very least a letter outlining the worship center's proposed water supply usage is required so that DEPRM can evaluate these risks.

In sum, I find the proposed use(s) does not meet the applicable criteria set forth in Section 502.1 of the B.C.Z.R., pursuant to *Schultz* and *Loyola, infra*. Specifically, the applicant for a special exception bears both the burden of production and the burden of persuasion on the issue of whether the special exception should be granted. I have been presented with evidence that generates a genuine question of fact as to whether the grant of a special exception would violate applicable legislation and case law. The Petitioners have not produced by a preponderous of evidence that the special exception will conform to the requirements and not having an adverse or negative impact on the properties located nearby. Additionally, the number of

RECEIVED FOR PLANNING
Date 3-3-09
By [signature]

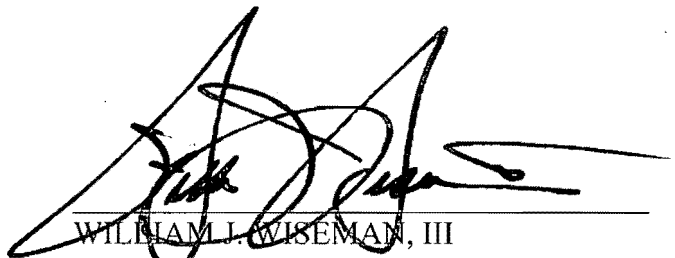
potential visitors and activities inherent in this type of use is one that lends itself to a larger and broader expansion not easily capable of control by the Division of Code Enforcement. These impacts are particularly severe here, due to the proximity of adjacent residential homes.

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

THEREFORE, IT IS ORDERED by the Zoning Commissioner of Baltimore County, this 3rd day of March 2008, that the Petition for Special Exception to permit the use of the described property for religious worship, school and camp and as a spiritual religious retreat center, pursuant to Sections 1A01.2C(4), (6) and (23) of the Baltimore County Zoning Regulations (B.C.Z.R.), in accordance with Petitioners' Exhibit 2, be and is hereby DENIED; and

IT IS FURTHER ORDERED that the Petition for Special Hearing seeking relief from Section 409.12 of the B.C.Z.R., to approve a modified parking plan, be and is hereby DISMISSED AS MOOT.

Any appeal of this decision must be taken in accordance with Section 32-3-401 of the Baltimore County Code.


WILLIAM J. WISEMAN, III
Zoning Commissioner
for Baltimore County

COPIES RETURNED FOR FILING
Date 3-3-09
By 103



BALTIMORE COUNTY

M A R Y L A N D

March 3, 2009

JAMES T. SMITH, JR.
County Executive

WILLIAM J. WISEMAN III
Zoning Commissioner

Sebastian A. Cross, Esquire
Gildea & Schmidt, LLC
600 Washington Avenue, Ste. 200
Towson, MD 21204

RE: **PETITIONS FOR SPECIAL HEARING AND SPECIAL EXCEPTION**
E/S Hanover Pike, 4,900' S c/line of Emory Road
(14821 Hanover Pike)
4th Election District - 3rd Council District
Robert L. Brantley, et ux - Petitioners
Case No. 2009-0042-SPHX

Dear Mr. Cross:

Enclosed please find a copy of the decision rendered in the above-captioned matter. The Petition for Special Hearing has been dismissed as moot and the Petition for Special Exception has 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,

A handwritten signature in black ink, appearing to read "William J. Wiseman, III".

WILLIAM J. WISEMAN, III
Zoning Commissioner
for Baltimore County

WJW:dlw
Enclosure

c: Robert L. and Astra P. Brantley, 14821 Hanover Pike, Upperco, MD 21155
Matthew T. Allen, P.E., Bohler Engineering, P.C., 810 Gleneagles Court, Suite 300,
Towson, MD 21286
S. Glenn Elseroad, 5423 Mt. Gilead Road, Reisterstown, MD 21136
George P. Neubeck, Jr., 14301 Hanover Pike, Reisterstown, MD 21136
Carol D. Isaac, 15003 Hanover Pike, Upperco, MD 21155
Sandra M. Brown, 5135 Frye Road, Upperco, MD 21155
Robert Slaterbeck, 13929 Old Hanover Road, Reisterstown, MD 21136
Charlotte Coarts and Charlene L. Hughes, 14825 Hanover Pike, Upperco, MD 21155
John R. Lorenz, 14629 Hanover Pike, Upperco, MD 21155
Paul R. and Frances C. Joyce, 15713 Dover Road, Upperco, MD 21155
J. Carroll Holzer, Esquire, Holzer & Lee, 508 Fairmount Avenue, Towson, MD 21286
Patricia R. Fallon and Barbara D. Ambrose, 14823 Hanover Pike, Upperco, MD 21155
People's Counsel; File; *Code Enforcement*



Petition for Special Hearing

to the Zoning Commissioner of Baltimore County

for the property located at 14821 Hanover Pike
which is presently zoned R.C. 2

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 Special Hearing under Section 500.7 of the Zoning Regulations of Baltimore County, to determine whether or not the Zoning Commissioner should approve, if necessary,

1. A modified parking plan pursuant to 409.12 of the BCZR.
2. For such other and further relief as may be deemed necessary by the Zoning Commissioner.

Property is to be posted and advertised as prescribed by the zoning regulations. I, or we, agree to pay expenses of above Special Hearing, 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:

Name - Type or Print

Signature

Address

Telephone No.

City

State

Zip Code

Attorney For Petitioner:

Sebastian A. Cross

Name - Type or Print

City

Signature

Gildea & Schmidt, LLC

Company

600 Washington Avenue, Suite 200

(410) 821-

Address

Telephone No.

Towson

MD

212

City

State

Zip Code

Legal Owner(s):

Robert L. & Astra Brantley

Name - Type or Print

Signature

Name - Type or Print

Signature

14821 Hanover Pike

443-471-6668

Address

Telephone No.

Upperco

MD

21155

City

State

Zip Code

Representative to be Contacted:

Sebastian A. Cross

Name

600 Washington Avenue, Suite 200

(410) 821-

Address

Telephone No.

Towson

MD

21

City

State

Zip Code

OFFICE USE ONLY

ESTIMATED LENGTH OF HEARING _____

UNAVAILABLE FOR HEARING _____

Case No. 2009-0042-SPHX

Reviewed By th

Date 8/7/08

REV 9/15/98

UNDER RECEIVED FOR FILING
Date 3-3-09
By OW



Petition for Special Exception

to the Zoning Commissioner of Baltimore County

for the property located at 14821 Hanover Pike

which is presently zoned R.C. 2

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 Special Exception under the Zoning Regulations of Baltimore County, to use the herein described property for

Per BCZR Section 1A01.2.C(4), (6) & (23) for use of an existing building for religious worship, school and camp as a spiritual religious retreat center

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

I, or we, agree to pay expenses of above Special Exception, 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:

Name - Type or Print

Signature

Address

Telephone No.

City

State

Zip Code

Attorney For Petitioner:

Sebastian A. Cross, Esq.

Name - Type or Print

Signature

Gildea & Schmidt, LLC

Company

600 Washington Avenue, Suite 200 410-821-0070

Address

Telephone No.

Towson

MD

21204

City

State

Zip Code

Legal Owner(s):

Robert L. & Astra Brantley

Name - Type or Print

Signature

Name - Type or Print

Signature

14821 Hanover Pike

443-471-6668

Address

Telephone No.

Upperco

MD

21155

State

Zip Code

Representative to be Contacted:

Sebastian A. Cross, Esq.

Name

600 Washington Avenue, Suite 200

410-821-0070

Address

Telephone No.

Towson

MD

21204

City

State

Zip Code

OFFICE USE ONLY

ESTIMATED LENGTH OF HEARING

UNAVAILABLE FOR HEARING

Reviewed By

Date

Case No. 2009-0042-SPHX

REV 09/15/98

ORDER RECEIVED FOR FILING
Date 3-3-09
By [Signature]

July 18, 2008

**ZONING DESCRIPTION
OF PART OF THE LANDS KNOWN AS
TAX MAP 31, PARCEL 353, LOT 2, GRID 10 WITH DEED
REFERENCE 20649/127
APPROXIMATELY 4,900 FEET SOUTHEAST OF THE INTERSECTION OF
EMORY ROAD AND HANOVER PIKE (MD ROUTE 30)
AS RECORDED IN THE LAND RECORDS OF
BALTIMORE COUNTY, MARYLAND
4TH DISTRICT**

BEGINNING AT A POINT ON THE EAST SIDE OF HANOVER PIKE WITH AN 80' WIDE RIGHT-OF-WAY, 40' FROM THE CENTERLINE AT THE DISTANCE OF 4,900' SOUTH OF THE CENTERLINE OF THE NEAREST IMPROVED INTERSECTING STREET EMORY ROAD.

1. SOUTH 89 DEGREES 37 MINUTES 03 SECONDS WEST; 871.20 FEET TO A POINT.
2. NORTH 00 DEGREES 22 MINUTES 57 SECONDS WEST; 147.69 FEET TO A POINT.
3. NORTH 89 DEGREES 37 MINUTES 03 SECONDS EAST; 871.20 FEET TO A POINT.
4. SOUTH 00 DEGREES 22 MINUTES 57 SECONDS EAST; 147.69 FEET TO A POINT TO THE POINT OF BEGINNING

BEING ALSO KNOWN AS PARCEL 353, LOT 2, AS RECORDED IN BALTIMORE COUNTY LIBER 20649 FOLIO 127, CONTAINING IN ALL 2.9539 ACRES OF LAND MORE OR LESS.



2009-0042-SPHX

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: #2009-0042-SPHX

14821 Hanover Pike

E/side of Hanover Pike, 4,900 feet south of the centerline of Emory Road

4th Election District - 3rd Councilmanic District

Legal Owner(s): Robert & Astra Brantley

Special Hearing: to permit a modified parking plan and for such other further relief as may be deemed necessary by the Zoning Commissioner. **Special Exception:** to permit the use of an existing building for religious worship and camp as a spiritual religious retreat center.

Hearing: Wednesday, September 24, 2008 at 9:00 a.m. in Room 104, Jefferson Building, 105 West Chesapeake Avenue, Towson 21204.

WILLIAM J. WISEMAN, III

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.

9/6/32 Sept '9

-182958

CERTIFICATE OF PUBLICATION

9/11/2008

THIS IS TO CERTIFY, that the annexed advertisement was published in the following weekly newspaper published in Baltimore County, Md., once in each of 1 successive weeks, the first publication appearing on 9/9/2008.

- ☒ The Jeffersonian
- ☐ Arbutus Times
- ☐ Catonsville Times
- ☐ Towson Times
- ☐ Owings Mills Times
- ☐ NE Booster/Reporter
- ☐ North County News

S. Wilkinson

LEGAL ADVERTISING

ZONING NOTICE

CASE # 2009-0042-SPHX

**A PUBLIC HEARING WILL BE HELD BY
THE ZONING COMMISSIONER
IN TOWSON, MD**

Room 104, JEFFERSON BUILDING
PLACE: 105 W. CHESAPEAKE AVE. TOWSON

DATE AND TIME: WEDNESDAY, SEPTEMBER 24, 2008 AT 9:00 A.M.

REQUEST: SPECIAL HEARING TO PERMIT A MODIFIED PARKING
PLAN AND FOR SUCH OTHER FURTHER RELIEF AS MAY BE DEEMED
NECESSARY BY THE ZONING COMMISSIONER. SPECIAL EXCEPTION TO
PERMIT THE USE OF AN EXISTING BUILDING FOR RELIGIOUS
WORSHIP AND CAMP AS A SPIRITUAL RELIGIOUS RETREAT
CENTER.

POSTPONEMENTS DUE TO WEATHER OR OTHER CONDITIONS ARE SOMETIMES NECESSARY.
TO CONFIRM HEARING CALL 887-3391

DO NOT REMOVE THIS SIGN AND POST UNTIL DAY OF HEARING, UNDER PENALTY OF LAW

HANDICAPPED ACCESSIBLE

CERTIFICATE OF POSTING

RE: Case No.: 2009-0042-SPHX

Petitioner/Developer: _____

Robert & Astra Brantley

Date of Hearing/Closing: Sept 24, 08

Baltimore County Department of
Permits and Development Management
County Office Building, Room 111
111 West Chesapeake Avenue
Towson, Maryland 21204

ATTN: Kristen Matthews

Ladies and Gentlemen:

This letter is to certify under the penalties of perjury that the necessary sign(s) required by law were posted conspicuously on the property located at: _____

14821 Hanover Pike

The sign(s) were posted on Sept 7, 2008
(Month, Day, Year)

Sincerely,

Robert Black Sept 9, 08
(Signature of Sign Poster) (Date)

SSG Robert Black

(Print Name)

1508 Leslie Road

(Address)

Dundalk, Maryland 21222

(City, State, Zip Code)

(410) 282-7940

(Telephone Number)

BALTIMORE COUNTY, MARYLAND
OFFICE OF BUDGET AND FINANCE
MISCELLANEOUS RECEIPT

No. 18571

PAID RECEIPT

Date 8/7/08

RECEIVED BY: [Signature] DATE: 8/07/2008 TIME: 10:59 AM

RECEIVED BY: [Signature] DATE: 7/31/2008 TIME: 10:59 AM

Fund	Agcy	Orgn	Sub Orgn	Rev Source	Sub Rev	Rept Catg	BS Acct	Amount
001	006			6150				445.00

Total 445.00

Rec

From

Astoria Robert Bentley

For

19821 Howard Plc / 2009-0042 SPIN

11/17/08 2155

DISTRIBUTION

WHITE - CASHIER

PINK - AGENCY

YELLOW - CUSTOMER

**CASHIER'S
 VALIDATION**

Requested: July 24, 2009

APPEAL SIGN POSTING REQUEST

CASE NO.: 09-042-SPHX

14821 Hanover Pike

4th ELECTION DISTRICT

APPEALED: 4/1/09

ATTACHMENT – (Plan to accompany Petition – Petitioner's Exhibit No. 2)

*****COMPLETE AND RETURN BELOW INFORMATION*****

CERTIFICATE OF POSTING

TO: Baltimore County Board of Appeals
The Jefferson Building, Suite 203
102 W. Chesapeake Avenue
Towson, MD 21204

Attention: Theresa Shelton
Administrator

CASE NO.: 09-042-SPHX

LEGAL OWNER: Robert and Astra Brantley

This is to certify that the necessary appeal sign was posted conspicuously on the property located at:

14821 HANOVER PIKE
E/SIDE HANOVER PIKE, 4,900' S/ OF C/L EMORY ROAD

The sign was posted on 8.19.09, 200 .

By: M Stuart Kelly

(Signature of Sign Poster)

M Stuart Kelly
(Print Name)

PHOTOGRAPHIC RECORD

CASE#

Facility No.: 09-042 SPHX Record No.: _____

Date of Photograph(s): 8.19.09



I HEREBY CERTIFY that I took 2 photographs set out above, and that these photographs fairly and accurately depict the condition of the property that is the subject of the above referenced Facility/Record Number on the date set above.

M. Stuart Kelly
(Enforcement Officer)



7153

GILDEA & SCHMIDT, LLC

600 WASHINGTON AVENUE
SUITE 200
TOWSON, MD 21204

BAY NATIONAL BANK
LUTHERVILLE, MD 21093

65-335-550

Apr 01, 2009

PAY TO THE
ORDER OF:

Baltimore County

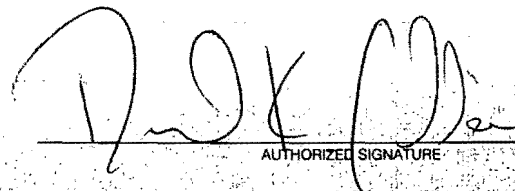
\$ 400.00

***** Four Hundred**

00/100 DOLLARS

Baltimore County
100 County Courts Building
401 Bosley Avenue
Towson, MD 21204

MEMO


AUTHORIZED SIGNATURE

Security features. Details on back.

⑈007153⑈ ⑆055003353⑆

⑈1000001784⑈



County Board of Appeals of Baltimore County

JEFFERSON BUILDING
SECOND FLOOR, SUITE 203
105 WEST CHESAPEAKE AVENUE
TOWSON, MARYLAND, 21204
410-887-3180
FAX: 410-887-3182

Hearing Room #2, Second Floor
Jefferson Building, 105 W. Chesapeake Avenue

August 24, 2009

NOTICE OF ASSIGNMENT

CASE #: 09-042-SPHX **IN THE MATTER OF: Robert L. and Astra Brantley** - Legal Owner/ Petitioner
14821 Hanover Pike, Upperco / 4th E; 3rd C

RE: Petition for Special Hearing modified parking plan pursuant to 409.12 of the BCZR
Petition for Special Exception for use of an existing building for religious worship, school and camp
as a spiritual religious retreat center per BCZR Section 1A01.2.C(4), (6) & (23).

3/3/09 – Decision by the Zoning Commissioner Denying the Petition for Special Exception, rendering
the Special Hearing Moot..

ASSIGNED FOR: WEDNESDAY, OCTOBER 14, 2009, AT 10:00 A.M.

NOTICE: This appeal is an evidentiary hearing; therefore, parties should consider the advisability of retaining an attorney

Please refer to the Board's Rules of Practice & Procedure, Appendix B, Baltimore County Code.

IMPORTANT: No postponements will be granted without sufficient reasons; said requests must be in writing and in compliance with Rule 2(b) of the Board's Rules. No postponements will be granted within 15 days of scheduled hearing date unless in full compliance with Rule 2(c).

If you have a disability requiring special accommodations, please contact this office at least one week prior to hearing date

Theresa R. Shelton
Administrator

c: Appellants/Petitioners : Robert Brantley and Astra Brantley

Counsel for Respondents : J. Carroll Holzer, Esquire
Respondents : Patricia R. Fallon
 : Barbara D. Ambrose

Matthew Allen, Bohler Engineering

S. Glen Elseroad

Sandra Brown

Charlene Hughes

George Neubeck, Jr.

Robert Slaterbeck

John Lorenz

Carol Isaac

Charlotte Coarts

Paul and Frances Joyce

Office of People's Counsel

Timothy Kotroco, Director/PDM

John E. Beverungen, County Attorney

Michael Mohler, Deputy Director/Code Enforcement

William J. Wiseman, III, Zoning Commissioner

Arnold F. "Pat" Keller, III, Director/Planning

Nancy West, Assistant County Attorney

Margaret Ferguson, Code Enforcement Hearing Officer

TO: PATUXENT PUBLISHING COMPANY
Tuesday, September 9, 2008 Issue - Jeffersonian

Please forward billing to:

Gildea & Schmidt
600 Washington Avenue, Ste. 200
Towson, MD 21204

410-821-0070

NOTICE OF ZONING HEARING

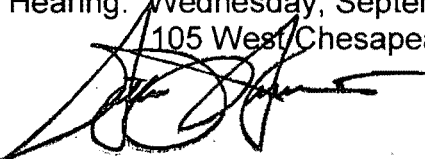
The Zoning Commissioner of Baltimore County, by authority of the Zoning Act and Regulations of Baltimore County, will hold a public hearing in Towson, Maryland on the property identified herein as follows:

CASE NUMBER: 2009-0042-SPHX

14821 Hanover Pike
E/side of Hanover Pike, 4,900 feet south of the centerline of Emory Road
4th Election District – 3rd Councilmanic District
Legal Owners: Robert & Astra Brantley

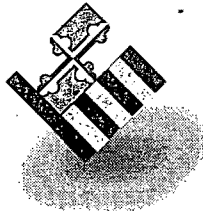
Special Hearing to permit a modified parking plan and for such other further relief as may be deemed necessary by the Zoning Commissioner. Special Exception to permit the use of an existing building for religious worship and camp as a spiritual religious retreat center.

Hearing: Wednesday, September 24, 2008 at 9:00 a.m. in Room 104, Jefferson Building,
105 West Chesapeake Avenue, Towson 21204



WILLIAM J. WISEMAN III
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.



BALTIMORE COUNTY
M A R Y L A N D

JAMES T. SMITH, JR.
County Executive

TIMOTHY M. KOTROCO, Director
Department of Permits and
Development Management
August 28, 2008

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: 2009-0042-SPHX

14821 Hanover Pike

E/side of Hanover Pike, 4,900 feet south of the centerline of Emory Road

4th Election District – 3rd Councilmanic District

Legal Owners: Robert & Astra Brantley

Special Hearing to permit a modified parking plan and for such other further relief as may be deemed necessary by the Zoning Commissioner. Special Exception to permit the use of an existing building for religious worship and camp as a spiritual religious retreat center.

Hearing: Wednesday, September 24, 2008 at 9:00 a.m. in Room 104, Jefferson Building,
105 West Chesapeake Avenue, Towson 21204

A handwritten signature in black ink that reads "Timothy Kotroco".

Timothy Kotroco
Director

TK:klm

C: Sebastian Cross, 600 Washington Avenue, Ste. 200, Towson 21204
Mr. & Mrs. Brantley, 14821 Hanover Pike, Upperco 21155

- NOTES: (1) **THE PETITIONER MUST HAVE THE ZONING NOTICE SIGN POSTED BY AN APPROVED POSTER ON THE PROPERTY BY TUESDAY, SEPTEMBER 9, 2008.**
- (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.

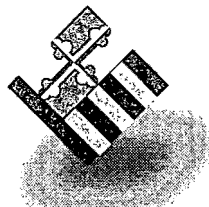
OPINIONS MAY NOT BE ISSUED UNTIL ALL ADVERTISING COSTS ARE PAID.

For Newspaper Advertising:

Item Number or Case Number: 2009-0042-SPHX
Petitioner: Robert L. + Astra Brantley
Address or Location: 14821 Hanover Pk

PLEASE FORWARD ADVERTISING BILL TO:

Name: G. Idea + Schmidt LLC
Address: 600 Washington Ave, Suite 200
Towson MD 21204
Telephone Number: 410 821-0090



BALTIMORE COUNTY

M A R Y L A N D

JAMES T. SMITH, JR.
County Executive

TIMOTHY M. KOTROCO, *Director*
Department of Permits and
Development Management

September 17, 2008

Sebastian A. Cross
Gildea & Schmidt, LLC
600 Washington Ave. Ste. 200
Towson, MD 21204

Dear: Sebastian A. Cross

RE: Case Number 2009-0042-SPHX, 14821 Hanover Pike

The above referenced petition was accepted for processing **ONLY** by the Bureau of Zoning Review, Department of Permits and Development Management (PDM) on August 7, 2008. This letter is not an approval, but only a **NOTIFICATION**.

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,

A handwritten signature in black ink, reading "W. Carl Richards, Jr.".

W. Carl Richards, Jr.
Supervisor, Zoning Review

WCR:lnw

Enclosures

c: People's Counsel
Robert L. & Astra Brantley, 14821 Hanover Pike, Upperco, MD 21155

BALTIMORE COUNTY, MARYLAND

INTEROFFICE CORRESPONDENCE

TO: Timothy M. Kotroco, Director
Department of Permits &
Development Management

DATE: August 27, 2008

FROM: Dennis A. Kennedy, Supervisor
Bureau of Development Plans
Review

SUBJECT: Zoning Advisory Committee Meeting
For August 25, 2008
Item Nos. 09-0038, 0040, 0041, 0042, 0044, and 0045

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

DAK:CEN:lrk
cc: File
ZAC- 08272008-NO COMMENTS

BW 9/24
9am

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: Timothy M. Kotroco, Director
Department of Permits and
Development Management

DATE: September 3, 2008

RECEIVED
SEP 05 2008
BY:

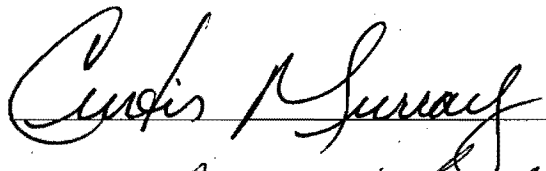
FROM: Arnold F. 'Pat' Keller, III
Director, Office of Planning

SUBJECT: Zoning Advisory Petition(s): Case(s) 09-042- Special Exception and Special Hearing

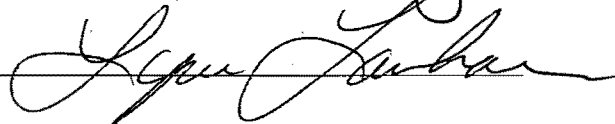
The Office of Planning has reviewed the above referenced case(s) and does not oppose the petitioner's request however, no further expansion of the worship center, camp/school or other ancillary use shall occur.

For further questions or additional information concerning the matters stated herein, please contact Jessie Bialek in the Office of Planning at 410-887-3480.

Prepared By:



Division Chief:
CM/LL



BALTIMORE COUNTY, MARYLAND

Inter-Office Correspondence



RECEIVED
SEP 23 2008

BY:.....

TO: Timothy M. Kotroco

FROM: Dave Lykens, DEPRM - Development Coordination

DATE: September 23, 2008

SUBJECT: Zoning Item # 09-042-SPHX
Address 14821 Hanover Pike
(Brantley Property)

Zoning Advisory Committee Meeting of August 18, 2008

_____ The Department of Environmental Protection and Resource Management has no comments on the above-referenced zoning item.

 X The Department of Environmental Protection and Resource Management offers the following comments on the above-referenced zoning item:

_____ Development of the property must comply with the Regulations for the Protection of Water Quality, Streams, Wetlands and Floodplains (Sections 33-3-101 through 33-3-120 of the Baltimore County Code).

 X Construction activities occurring on this property may have to comply with Environmental Impact Review's (EIR) Forest Conservation Regulations (Sections 33-6-101 through 33-6-122 of the Baltimore County Code).

Additional Comments:

Additional information must be submitted to Ground Water Management prior to approval for use as a worship center to determine the impact on the well and septic systems. A usage letter must be submitted. Additional soil evaluations and monitoring of the water supply may be required. Contact GWM for more information.

Reviewers: S. Farinetti, GWM
Michael S. Kulis, EIR

Date: 8/21/2008
Date 9/16/2008

RE: PETITION FOR SPECIAL HEARING * BEFORE THE
AND SPECIAL EXCEPTION * ZONING COMMISSIONER
14821 Hanover Pike; E/S Hanover Pike, *
4,900' S of c/line Emory Road *
4th Election & 3rd Councilmanic Districts * FOR
Legal Owner(s): Robert & Astra Brantley *
Petitioner(s) * BALTIMORE COUNTY
* 09-042-SPHX

* * * * *

ENTRY OF APPEARANCE

Please enter the appearance of People's Counsel in the above-captioned matter. Notice should be sent of any hearing dates or other proceedings in this matter and the passage of any preliminary or final Order. All parties should copy People's Counsel on all correspondence sent/ documentation filed in the case.

RECEIVED

AUG 20 2008

.....

Peter Max Zimmerman
PETER MAX ZIMMERMAN
People's Counsel for Baltimore County

Carole S. Demilio
CAROLE S. DEMILIO
Deputy People's Counsel
Jefferson Building, Room 204
105 West Chesapeake Avenue
Towson, MD 21204
(410) 887-2188

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of August, 2008, a copy of the foregoing Entry of Appearance was mailed to Sebastian A. Cross, Esquire, Gildea & Schmidt LLC, 600 Washington Avenue, Suite 200, Towson, MD 21204, Attorney for Petitioner(s).

Peter Max Zimmerman
PETER MAX ZIMMERMAN
People's Counsel for Baltimore County

GILDEA & SCHMIDT, LLC

600 WASHINGTON AVENUE

SUITE 200

TOWSON, MARYLAND 21204

TELEPHONE 410-821-0070

FACSIMILE 410-821-0071

www.gildeallc.com

DAVID K. GILDEA

LAWRENCE E. SCHMIDT

D. DUSKY HOLMAN

SEBASTIAN A. CROSS

CHARLES B. MAREK, III

JASON T. VETTORI

RECEIVED

JUL - 2 2009

BALTIMORE COUNTY
BOARD OF APPEALS

June 30, 2009

Ms. Theresa R. Shelton
County Board of Appeals of Baltimore County
The Jefferson Building
105 W. Chesapeake Avenue, Suite 203
Towson, MD 21204

Re: Robert L. Brantley, Legal Owner
E/S Hanover Pike, 4,900' S c/line of Emory Road (14821 Hanover Pike)
Case Number: 2009-0042-SPHX

Dear Ms. Shelton:

Kindly strike my appearance as counsel for Robert L. Brantley, Legal Owner/Petitioner in the above matter. I appeared at the hearing before Zoning Commissioner Wiseman on behalf of the Legal Owner/Petitioner Robert L. Brantley and participated therein, however, will not be representing Mr. Brantley at the hearing before the Board. Please forward any and all correspondence directly to Robert L. Brantley.

Thank you for your attention to this matter.

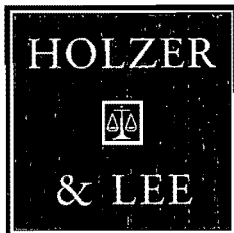
Very truly yours,



Sebastian A. Cross

SAC: dls

CC: Robert L. Brantley



LAW OFFICES

J. CARROLL HOLZER, PA

J. HOWARD HOLZER

1907-1989

THOMAS J. LEE

OF COUNSEL

THE 508 BUILDING

508 FAIRMOUNT AVE.

TOWSON, MD 21286

(410) 825-6961

FAX: (410) 825-4923

~~E-MAIL: JCHOLZER@BCPL.NET~~

jcholzer@cavtel.net

July 24, 2009

#7816

RECEIVED

JUL 27 2009

BALTIMORE COUNTY
BOARD OF APPEALS

Ms. Theresa R. Shelton, Administrator
Baltimore County Board of Appeals
Jefferson Building
105 West Chesapeake Avenue
Second Floor, Suite 203
Towson, Maryland 21204

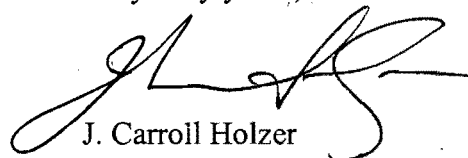
RE: *Petitions for Special Hearing and Special Exception*
14821 Hanover Pike
Robert Brantley, et ux., Petitioners
Case No.: 2009-0042-SPHX

Dear Ms. Shelton:

Please be advised that I represent a number of Community Associations and neighbors who have protested the use of the above property. On March 3, 2009, the Zoning Commissioner passed an Opinion and Order denying the requested relief. From that Decision, the Petitioner appealed to the Board in early April 2009.

At the present time, the case has not been scheduled before the Board and certain activities have continued to take place during the interim. I would respectfully request that this matter be put in for a hearing before the Board promptly.

Very truly yours,



J. Carroll Holzer

JCH:mlg

cc: Peter Max Zimmerman, Esquire
Sebastian Cross, Esquire



County Board of Appeals of Baltimore County

JEFFERSON BUILDING
SECOND FLOOR, SUITE 203
105 WEST CHESAPEAKE AVENUE
TOWSON, MARYLAND, 21204
410-887-3180
FAX: 410-887-3182

July 28, 2009

J. Carroll Holzer, Esquire
508 Fairmount Avenue
Towson, MD 21286

RE: *In the Matter of: Robert Brantley / 14821 Hanover Pike*
Case No.: 09-042-SPHX

Dear Mr. Holzer:

The Board is in receipt of your correspondence of July 24, 2009 regarding a hearing date for the subject matter. Please note that the Board received the appeal on July 23, 2009.

The Board sits on Tuesday, Wednesday and Thursday of each week. At this point in time, the Board's docket is scheduled through the end of November, 2009.

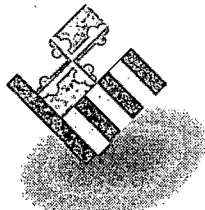
While your request for a hearing in the near future cannot be accommodated at this time, the file has been so noted, and should earlier dates become available due to dismissal or postponements, consideration will be given to earlier assignment of this matter.

Should you have any questions, please call me at 410-887-3180.

Very truly yours,

A handwritten signature in cursive script that reads "Theresa R. Shelton".
Theresa R. Shelton
Administrator

c: Office of People's Counsel
Sebastian A. Cross, Esquire
Robert L. and Astra Brantley



BALTIMORE COUNTY
M A R Y L A N D

RECEIVED

JUL 23 2009

**BALTIMORE COUNTY
BOARD OF APPEALS**

JAMES T. SMITH, JR.
County Executive

Sebastian Cross, Esq.
Gildea & Schmidt
600 Washington Avenue, Ste. 200
Towson, MD 21204

July 20, 2009
TIMOTHY M. KOTROCO, *Director*
*Department of Permits and
Development Management*

Dear Mr. Cross:

RE: Case: 2009-0042-SPHX, 14821 Hanover Pike

Please be advised that an appeal of the above-referenced case was filed in this office on April 1, 2009 from your office. All materials relative to the case have been forwarded to the Baltimore County Board of Appeals (Board).

If you are the person or party taking the appeal, you should notify other similarly interested parties or persons known to you of the appeal. If you are an attorney of record, it is your responsibility to notify your client.

If you have any questions concerning this matter, please do not hesitate to call the Board at 410-887-3180.

Sincerely,

A handwritten signature in black ink that reads "Timothy Kotroco".

Timothy Kotroco
Director

TK:klm

c: William J. Wiseman III, Zoning Commissioner
Timothy Kotroco, Director of PDM
People's Counsel
Robert & Astra Brantley, 14821 Hanover Pike, Upperco 21155
Matthew Allen, Bohler Engineering, 810 Gleneagles Ct., Ste., 300, Towson 21286
S. Glenn Elseroad, 5423 Mt. Gilead Road, Reisterstown 21136
George Neubeck, Jr., 14301 Hanover Pike, Reisterstown 21136
Carol Isaac, 15003 Hanover Pike, Upperco 21155
Sandra Brown, 5135 Frye Road, Upperco 21155
Robert Slaterbeck, 13929 Old Hanover Road, Reisterstown 21136
Charlotte Coarts/Charlene Hughes, 14825 Hanover Pike, Upperco 21155
John Lorenz, 14629 Hanover Pike, Upperco 21155
Mr. & Mrs. Joyce, 15713 Dover Road, Upperco 21155
J. Carroll Holzer, Holzer & Lee, 508 Fairmount Avenue, Towson 21286
Patricia Fallon/Patricia Ambrose, 14823 Hanover Pike, Upperco 21155

APPEAL

Petition for Special Hearing & Special Exception
14821 Hanover Pike
E/side of Hanover Pike, 4,900 ft. s/of centerline of Emory Road
4th Election District – 3rd Councilmanic District
Legal Owners: Robert & Astra Brantley

Case No.: 2009-0042-SPHX

✓ Petition for Special Hearing & Special Exception (August 7, 2008)

✓ Zoning Description of Property

✓ Notice of Zoning Hearing (August 28, 2008)

✓ Certification of Publication (The Jeffersonian – September 9, 2008)

✓ Certificate of Posting (September 7, 2008) by Robert Black

✓ Entry of Appearance by People's Counsel (August 20, 2008)

✓ Petitioner(s) Sign-In Sheet – 2 Sheets

Protestant(s) Sign-In Sheet None

✓ Citizen(s) Sign-In Sheet – 2 Sheets

✓ Zoning Advisory Committee Comments

Petitioners' Exhibit

- ✓1. Aerial View of Property
- ✓2. Site Plan
- ✓3. Matthew Allen – Curriculum Vitae

Protestants' Exhibits:

- ✓1. Spa & Sparkle Internet Advertisement
- ✓2. Executive Meeting & Business Retreat @ Near Haven (Pamphlet)
- ✓3. Barbara Ambros (Power Point Presentation)
- ✓4. Plat Discrepancies
- ✓5. Website Advertisements
- ✓6. Listed Brantley Group Alcohol & Drug Treatment
- ✓7. Retreat Center Hotel & Guest House
- ✓8. Association of Inn Keepers Page, Retreat & Host Home
- ✓9. Advertise – Massage Therapy
- ✓10. Hotel Advertisement with features being offered
- ✓11. Advertisement (Massage/Acupuncture/Fitness Trainer)
- ✓12. Justice University addressed at 14821 Hanover Pike
- ✓13. Brochure – 15 Bridge Port
- ✓14. Loaves & Fishes
- ✓15. Method of Payments – Mental Health Services – Value Card
- ✓16. Bridge Point Brochure Summary of Activities
- ✓17. Identification Only Transcript of 9/24/08 Hearing

Miscellaneous (Not Marked as Exhibit)

- ✓1. Final Order of Code Enforcement Hearing Officer – August 16, 2007
- ✓2. Final Order of Code Enforcement Hearing Officer – June 24, 2008
- ✓3. Packet A thru E
- ✓4. Code Enforcement Issues
- ✓5. Request for Tax-Deductible Contributions
- ✓6. Findings of Fact & Conclusions of Law 00-284-A

RECEIVED
JUL 23 2009

**BALTIMORE COUNTY
BOARD OF APPEALS**

Page Two
July 22, 2009

- ✓ Zoning Commissioner's Order (DENIED – March 3, 2008)
- ✓ Notice of Appeal received on April 1, 2009 by Sebastian Cross

c: People's Counsel of Baltimore County, MS #2010
Zoning Commissioner
Timothy Kotroco, Director of PDM
See attached cover letter

date sent July 22, 2009, klm

Address List

09-042-SPHX

Petitioners:

Robert and Astra Brantley
14821 Hanover Pike
Upperco, MD 21155

Matthew Allen
Bohler Engineering
810 Gleneagles Court, Ste 300
Towson, MD 21286

Protestants

J. Carroll Holzer, Esquire
508 Fairmount Avenue
Towson, MD 21286
(Attorney for Protestants)

Patricia Fallon
14823 Hanover Pike
Upperco, MD 21155

Barbara Ambrose
14823 Hanover Pike
Upperco, MD 21155

Interested:

S. Glen Elseroad
5423 Mt. Filead Road
Reisterstown, MD 21136

George Neubeck, Jr.
14301 Hanover Pike
Reisterstown, MD 21136

Carol Isaac
15003 Hanover Pike
Upperco, MD 21155

Sandra Brown
5135 Frye Road
Upperco, MD 21155

Robert Slaterbeck
13929 Old Hanover Road
Reisterstown, MD 21136

Charlotte Coarts
Charlene Hughes
14825 Hanover Pike
Upperco, MD 21155

John Lorenz
14629 Hanover Pike
Upperco, MD 21155

Paul and Frances Joyce
15713 Dover Road
Upperco, MD 21155

Interoffice:

Office of People's Counsel
William J. Wiseman, III, Zoning Commissioner
Timothy Kotroco, Director/PDM
Arnold F. "Pat" Keller, III, Director/Planning
John E. Beverungen, County Attorney
Michael Mohler, Deputy Director/Code Enforcement
Margaret Ferguson, Code Enforcement Hearing Officer

Nancy Shert

BOARD OF APPEALS OF BALTIMORE COUNTY
MINUTES OF DELIBERATION

IN THE MATTER OF: Robert and Astra Brantley 09-042-SPHX

DATE: October 14, 2009

BOARD/PANEL: Lawrence Stahl
Andrew Belt
Edward Crizer, Jr.

RECORDED BY: Sunny Cannington/Legal Secretary

PURPOSE: To deliberate the following:

1. Petition for Special hearing to approve a modified parking plan; and
2. Petition for Special Exception for use of an existing building for religious worship, school, camp and as a spiritual religious retreat center.

PANEL MEMBERS DISCUSSED THE FOLLOWING:

STANDING

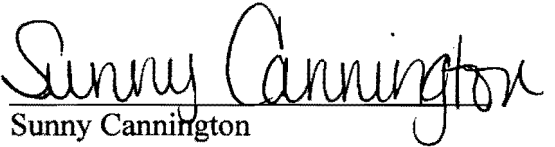
- The Board discussed that the Petitioners had abandoned their request to use the property for religious worship, school, and camp. The Petitioners were only requesting the religious retreat center and the modified parking plan.
- The Board discussed, that the property is the Petitioners' residence and the Petitioners use the property as a psychology practice. After a lengthy discussion, the Board determined that since they are not here on the issue of the use of the property as a psychology practice, they are unable to determine if the practice is allowable by law.
- The Board discussed the Petition for Special Exception. The Baltimore County Code is strict in its list of things that have to be addressed and resolved prior to the granting of the Special Exception. The Petitioners did not address any of the points on the list, nor did they address how these issues had been resolved.
- The Board determined since the Petitioners do not qualify for the Special Exception, the Special Hearing relief to approve a modified parking plan is moot.

DECISION BY BOARD MEMBERS: The Baltimore County Code is clear with regard to the circumstances in which a Special Exception may be granted. The Petitioners did not provide any evidence to indicate that they had address and resolved the issues presented by the Baltimore County Code.

FINAL DECISION: After thorough review of the facts, testimony, and law in the matter, the Board unanimously agreed to DENY the Petition for Special Exception and DISMISSED AS MOOT the Petition for Special Hearing.

NOTE: These minutes, which will become part of the case file, are intended to indicate for the record that a public deliberation took place on the above date regarding this matter. The Board's final decision and the facts and findings thereto will be set out in the written Opinion and Order to be issued by the Board.

Respectfully Submitted,


Sunny Cannington



Baltimore County, Maryland

OFFICE OF PEOPLE'S COUNSEL

Jefferson Building
105 West Chesapeake Avenue, Room 204
Towson, Maryland 21204

410-887-2188
Fax: 410-823-4236

PETER MAX ZIMMERMAN
People's Counsel

CAROLE S. DEMILIO
Deputy People's Counsel

September 30, 2009

Lawrence M. Stahl, Panel Chair
County Board of Appeals
105 W. Chesapeake Avenue, Suite 203
Towson, MD 21204

RECEIVED

SEP 30 2009

**BALTIMORE COUNTY
BOARD OF APPEALS**

Re: Robert L. & Astra Brantley,
Petitions for Special Hearing and Special Exception
14821 Hanover Pike
Case No.: 09-042

Dear Mr. Stahl:

People's Counsel is an interested party. Upon review of the file, it appears helpful to provide an introduction and overview prior to the County Board of Appeals (CBA) October 14, 2009 hearing.

Robert L. and Astra Brantley's August, 2008 petition for special exception requests permission "... for use of an existing building for religious worship, school and camp as spiritual religious retreat center." There is also a request for a special hearing for a modified parking plan. The petitions come in the wake of citizen complaints and enforcement proceedings.

Zoning Commissioner William J. Wiseman, III, identified the commercial nature of the activities on the site. He apparently assumed, without deciding, that the land uses at the site may qualify for special exception consideration. He denied the special exception on the merits in his March 3, 2009 opinion and order. He found petitioners failed to satisfy the BCZR § 502.1 special exception standards. On April 1, 2009, petitioners appealed to the CBA.

The CBA is very familiar with the special exception standards. What sets this case apart, however, are the threshold issues surrounding the accurate description and classification of the actual and proposed land uses at the site, and the determination of their eligibility or qualification among the enumerated uses permitted by special exception in the R.C. 2 (Agricultural) Zone.. For the reasons set forth below, the uses do not qualify.

Should the CBA nevertheless undertake a special exception analysis, there is a particular issue which comes into play alongside the basic § 502.1 criteria. It concerns the major side yard setback variance granted in 2000 to the previous owner for a dwelling addition and garage. Special exceptions are conditional uses. It is one thing to grant a variance for a garage addition to a dwelling. It is another thing entirely to tack on a special exception for a new, more intrusive use. Moreover, a variance suitable for a residential garage may not be appropriate for the Brantleys' expanded office, commercial, clinical, and recreational uses.

The questions presented, therefore, are as follows:

1. Do the land uses at the site qualify as uses permitted by special exception?
2. a. If so, do the land uses at the site satisfy special exception standards?
b. How does the side yard setback variance affect the analysis?

* * *

14821 Hanover Pike is located in the northwestern part of the county, in a rural area north of Reisterstown zoned R.C. 2. The property occupies about 3 acres, and has a single-family dwelling. In 2000, the previous property owner, Craig Garrett, obtained a variance for a side yard setback of 3 feet instead of the required 35 feet to add a garage to the dwelling. There was no opposition. Deputy Zoning Commissioner Timothy Kotroco granted the variance on February 4, 2000. Case 00-284-A. In 2004, the present petitioners, Robert L. and Astra Brantley, acquired the site and began to put it to uses which sparked this controversy.

The CBA hearing is a *de novo* hearing. But the documentary exhibits in the file provide a detailed picture of the uses at the site. Unlike most special exception cases, the petitions here come in after the fact. Therefore, we need not guess at the nature of the uses.

The documents on file include Petitioners' website for The Brantley Group, with itemized links; a brochure for the Near Haven Executive Meeting and Business Retreat; internet advertisements; listings for retreat center, hotel, guest house, and bed and breakfast; advertisements for massage therapy, acupuncture, and fitness training; description of payment methods, and Valuecard accounts.

The website contains curricula vitae for Robert Brantley, the managing director, with his business as well as religious qualifications and experience; Astra Brantley, Psy. D. and Clinical Director, with her psychological, psychotherapy, counseling and preferred provider qualifications and experience, along with Christian supervision. The Brantleys have staff available for massage therapy, acupuncture, and fitness training. There is a reasonable inference that there may be staff who help with clerical, housekeeping, and food service, but these are details yet to be explored.

The website first lists eleven "christian management services," spanning virtually every personal and business financial subject: debt, insurance, real estate, investment counseling, strategic business planning, organizational development, church management, family planning, grants proposal development, conflict resolution, and clergy coaching. It goes on to list seven "Christian mental health services:" individual/couples family counseling and psychotherapy, psychological assessments, clinical supervision for students and practitioners, clergy services, corporate services, clinical and applied research, and professional training. There is then a list of six "whole health living well counseling:" debt free living, multigenerational financial and estate planning, organic gardening, acoustic relaxation and meditation, stress self defense training, and meditative walking on site. There follows a lengthy list of seminars, workshops, support groups, and clinical trainings, and of classes and events. In conjunction with the above list, there are the advertisements for conferences, meetings, spa services, overnight accommodations, vacation home rental, bed and breakfast, and/or hotel services.

There are also detailed descriptions about the method of payment. All of these services are on a fee-paid basis. There are hourly rates for services and daily rates for overnight accommodations. The petitioners will accept medicare and tricare, but otherwise leave it up to clients to deal with their insurance companies.

In this context, it must be kept in mind that BCZR § 102.1 permits only uses which are enumerated and listed in the particular zone. See Kowalski v. Lamar 25 Md. App. 493 (1975); People's Counsel v. Surina 400 Md. 662 (2007). Therefore, the threshold question is whether the aforesaid uses are permitted uses, by right or special exception, in the R.C. 2 Zone. Our preliminary answer is that they clearly are not permitted uses.

So far as our research discloses, this virtual smorgasbord of financial, business, management, psychological, health, fitness, and other services are not permitted uses in the R.C.2 Agricultural Zone, either by right or special exception.. BCZR § 1A01.1.A, C. Rather, these are uses which traditionally function are classified as office, medical office (defined to include psychologists' offices), commercial recreation, and bed and breakfast uses. Such uses are variously defined and listed as permitted uses in the office, business, and manufacturing zones. BCZR §§202, 204 (R-O-A, R-O., offices and medical offices in converted residences as Class A office buildings); § 205 and 206 (OR-1 and OR-2, all types of office buildings); § 230 (B.L. offices, hotels); § 233, 236 (B.M. and B.R., Offices, hotels, commercial recreation enterprises); BCZR § 253, (M.L., offices); BCZR § 430.5, bed and breakfast PUDs.

To describe the petitioners' land use as a "retreat center" does not resolve the problem. There is no listed use for "retreat center." Moreover, it will not do to call the use a "retreat center" when the actual uses fit defined categories. See Smith v. Miller 249 Md. 900 (1968).

To be sure, the Loyola College "retreat center" passed muster as a "college." People's Counsel for Baltimore County v. Loyola College 406 Md. 54, 65 (2008). Loyola also called the use a "school" or "camp." Clearly, as a college or school use, it became eligible for a special exception.

The uses here are not comparable to the Loyola College use. Whether separately or in combination, the array of commercial uses do not qualify as college or school uses. In this connection, the petitioners' promotion of a justice university does not alter the realistic character of the principal uses on the site. Nor do the uses qualify as a day camp use.

Similarly, the listed uses do not qualify as "church or religious worship" uses. It may be that the petitioners are involved in Christian ministry and religious worship, and that spiritual activity occurs on the site. But this does not, from a zoning point of view, authorize the various office, business, financial, medical/psychological, commercial recreational and hotel/bed and breakfast/rental activities which predominate. Such uses as investment counseling, strategic business planning, financial and estate planning, and mental health services typically occur in office and institutional settings which may or may not have a religious component. The delineation of them as "Christian" management and mental health services does not alter the character and function of the land use activity.

Whether or not the spiritual dimension of the Brantley Group inspires or enhances the business, financial and mental health services, the land use activities must be treated as land use activities. For example, a hospital is still a hospital, an apartment building is still an apartment building, and a stadium is still a stadium, whether operated by a secular or religious organization. The same is true for investment firms, banks, medical offices, hotels, and bed and breakfasts. They are all subject to the same zoning laws, without favor or discrimination.

The English language can only be stretched so far before the words break. The threshold answer at this stage is that the land uses described and enumerated in petitioners' own documents do not fit within any of the permitted uses in the R.C. 2 Zone.

* * *

On the other hand, if the Petitioners' land uses were assumed to qualify for special exception review as a "building for religious worship, school and camp," then the established BCZR § 502.1 special exception standards would apply. The CBA would then consider whether the size, scale, and nature of the activities produce a particular adverse impacts on this neighborhood as interpreted in Loyola. Cf. People's Counsel v. Mangione 85 Md. App. 738 (1991). The Zoning Commissioner reviewed the relevant impacts at pages 9 and 10 of his opinion and found the cumulative impacts excessive in light of the size of the property, the location, and the character of the area. It will be up to the CBA to review these issues *de novo* should it decide that petitioners' land uses are eligible for special exception consideration.

There must also be considered the combination of the proposed special exception with the previously granted variance. Because special exceptions are conditional uses, the request to combine a variance with a special exception often connotes a failure to meet pertinent conditions. See Chester Haven Partnership v. County Board of Appeals 104 Md. App. 324 (1995); Umerley v. People's Counsel for Baltimore County 108 Md. App. 496, cert denied. 342 Md. 584(1996).

In the same vein, a variance granted without opposition, for an addition to a dwelling, does not necessarily apply to new uses with different impacts, especially special exception uses. The BCZR § 307.1 "practical difficulty" criteria include a consideration of justice to area property owners and consistency with the spirit and intent of the zoning laws and the public safety, health and welfare. See McLean v. Soley 270 Md. 208, 213-14 (1973); Trinity Assembly of God v. People's Counsel for Baltimore County 407 Md. 54, 83-84 (2008). There is thus a serious question as to the relationship or survival of the 2000 variance with new uses.

* * *

Again, a significant aspect of this case is that the Petitioners' land uses are already active. Normally, a petition for special exception should precede the use. It is not in the proper order of things to engage in the use and then apply to determine if it is legitimate. As a result, the area citizens have had to take action to try to obtain a remedy. The only solace may be that there is a more accurate and well-defined description available with respect to the relevant land use activities. Here, it is much harder for petitioners to provide advantageous descriptions of the use which do not necessarily square with the facts on the ground.

Thank you for your consideration.

Respectfully,



Peter Max Zimmerman
People's Counsel for Baltimore County



Carole S. Demilio
Deputy People's Counsel

cc: Robert L. and Astra Brantley
J. Carroll Holzer, Esquire

MEMORANDUM

10/15/2009

TO: LAWRENCE M. STAHL
Panel Chair
HOWARD COUNTY BOARD OF APPEALS

FROM: ROBERT L. & ASTRA P. BRANTLEY *RJB 9/8/09*
Petitions for Special hearing and Special Exceptions
14821 Hanover Pike
Case No.: 09-042

RE: OPENING STATEMENT

Thank you, Mr. Stahl, for this opportunity to make/submit this opening statement. Without the benefit of legal counsel, we appear before you with a determination that the truth be told regarding our case; and with full confidence that the rule of law and the proceedings of this hearing will provide us the protections that we seek under the law, which was and is our sole motivation for our requests and our appeal.

We desire only to be protected from lawless and dangerous neighbors who would lie to and attempt to manipulate Baltimore County authorities in their campaign to deny us the quiet enjoyment and legal use of our home. I am an ordained Christian clergyman, a Clergy Coach, a Pastoral Counselor, and a family financial and estate planner. My wife is a State Licensed Clinical Psychologist. We both are "professional persons" who work from our home. We have no employees, and we use less than 25% of the total floor area of our home for business purposes.

According to an official County document entitled: "RESOURCE CONSERVATION ZONES", SECTION 1A01, R.C.2 (Agricultural Zone), pages 1A-5 and 1A-6, dated 04-15-2005 (see copy attached), section 1A01.2 entitled Use Regulations, point B, "Uses permitted as of right" include, but are not limited to: "offices or studios of physicians, dentists, lawyers, architects, engineers, artists, musicians or other professional persons, provided that any such office or studio is established within the same building as that serving as the professional person's primary residence at the time of application; does not occupy more than 25% of the total floor area of that residence; and does not involve the employment of more than one nonresident employee. [Bill Nos. 78-1979; 105-1982; 65-1999]

Through fraudulent claims and complaints, our neighbors to the north (Ms. Patti Fallon and Ms. Barbara Ambrose) have forced these proceedings in pursuit of their assaultive pledge to come after me and get me because they wrongfully imagine that I abused their cats; when in fact it is their relentless abuse of County law (limiting residents to 3 pets that must be collared and leashed when outside the home) that results in a proliferation of feral cats that sometimes abuse domesticated pets. Please see attachments that document their dangerous lawlessness, from which we seek legal protection under the law.

PERSONAL STATEMENT FROM
Astra P. Brantley
Licensed Clinical Psychologist

I am writing this because I have never testified before these proceedings.

As this body is aware, I have been a licensed clinical psychologist in the state of Maryland for 23 years. I received a discount on my most recent malpractice insurance because I have never had a complaint!

My husband, Robert and I have been living not in Upperco, MD, but in the Twilight Zone of the past two years of our five years at 14821 Hanover Pike.

In June of 2004, we were looking for a place in order to move from downtown Baltimore. God led us to 14821 Hanover Pike one Saturday. We viewed and toured the house that Sunday and in 14 days, July 1st, we closed on the property! August 2004, we started moving in. That month Ms. Fallon and Ms. Ambrose came over (empty handed -- no bread or cookies) to check us out. The next time I spoke to either of them was June 2005 when I told Patti that Mr. Brantley had suffered a heart attack May 12, 2005. (This is noteworthy because the last three years of harassment that they have subjected my husband to is particularly insidious in light of their being aware of his heart condition).

July 2005, Camp Wesley was hosted at Near Haven for the first of three years. It was not a business enterprise for us. Sherie Hughes, who worked at Santoni's, shared with my husband that she coordinated a camp for her church. She stated further how she was in a bind because the new Pastor wanted to use the parsonage and so the camp could not be conducted from there. They did not have the money or time to get another place. Mr. Brantley suggested that she come and look at our property and see if she could use it. We had no input into how the camp was conducted; it was solely under the management of John Wesley United Methodist Church. WE RECEIVED NO PAYMENT FOR THE USE OF THE PROPERTY, THAT ONE WEEK IN JULY. I DID NOT SEE CLIENTS IN THE EVENINGS BECAUSE MR BRANTLEY AND I PARTICIPATED IN VESPERS. FINALLY AT THE END OF JULY, WE HAD A LARGER BGE BILL TO PAY! The camp was never a project of the Brantley Group and never advertised as such! The church had a all white congregation. The congregation had the experience of interacting with well educated Blacks who were not drug addicts, muggers or needing a hand out!

It is noteworthy that Ms. Fallon and Ms. Ambrose did not complain to Zoning until 2007! So what sparked their community protectionism?

By spring 2007, the population of feral cats roaming on our property had grown to 19! So what do law-abiding citizens do? We called the Animal Control Division. That decision was the beginning of our nightmare!

After one cat had been captured and picked up by ACD, we received a visit from Ms. Fallon. She explained how the cats were not feral, it was simply that they did not put collars on the cats because they might get caught up in trees, and how they had paid to have some of the cats get shots, so they were not carrying diseases. Finally, that she was trying to place the cats in homes. In the spirit of cooperation, my husband agreed to the following:

1. To call Ms Fallon whenever he caught a cat, so she could determine if it was one of hers;
2. To give her the phone number of a friend who had moved to PA on a farm, and loved cats.

Among our laundry list of services and qualifications is Christian conciliation; we were the first certified in the State of Maryland by Peacemaker Ministries! So embracing peaceful solutions is a part of our training and values!

Within days, Ms Fallon violated the agreement as follows:

1. She hounded our friend so much that he called complaining to Bob about giving her his number;
2. She trespassed on our property and removed a cat and the cage loaned to us by ACD. Our liability was over sixty dollars! She REFUSED to return the cage to us (demonstrating her growing impatience, contempt and disrespect). This was her first out of control behavior. She insisted upon returning the cage to ACD. In the Exhibits is a note from a clerk at ACD acknowledging when she returned the cage. This also establishes that she illegally took it! Further proof is her personal comments that are documented in the record.

When the cage was returned, cats would not go within seven feet of it. Mr. Brantley purchased a pellet rifle to frighten the now remaining 14 cats!

Further escalation of out of control behavior was in mid-May when Ms. Fallon verbally assaulted me by shouting over to me, "Have you killed any cats today? What kind of Christian are you?" I was appalled and caught completely off guard.

Sunday, June 3rd, we experienced further escalation of Ms. Fallon's out of control behavior. This date, my husband and I had been planting butterfly buses in the compost area and marigolds around the garden for about three to four hours. Ms. Fallon had to be stalking us because when my husband drove to the front of the house, she came up and startled him; he told her as much. She commented, "Good. You deserve it!" Ms. Fallon was ranting and raving uncontrollably. As attested to in his sworn affidavit, she refused to leave the property when he asked her to. Instead she followed him onto the front porch where she swore this vendetta, "If anything has happened to my cat, I am coming after you!" My husband left her screaming and called the police.

Ms. Fallon's vow that she would come after him is why we are all gathered here today.

In his paperwork, Bob requested the Ms. Fallon get counseling, but the court chose to minimized her escalating levels of threat to my husband and myself! So what happens when an out of control person is allowed to be out of control? She escalates.

Next escalation: Ms. Fallon filed a false sworn affidavit that my husband attacked her in the Hampstead Walmart. I was with my husband and it is my sworn testimony that we did not see Ms. Fallon and Ms. Ambrose until we were on the parking lot! Their attorney keeps alleging that Mr. Brantley did not defend against the charge. However, this is completely over looking his letter to the Court, pointing out how the false allegation was Ms. Fallon carrying out her threat! All our entreaties to the Court have been ignored. We have received no justice or protection!

If Ms. Fallon had been attacked in Walmart as she has falsely asserted, Mr. Brantley would have been removed from Walmart in handcuffs and taken to jail. He probably would have been barred from ever entering the store again. But Ms. Fallon did not alert management to call the police because they hatched the lie on the way home from the Walmart. Therefore there was no police report from the Walmart, and I am confident, if a 300 pound Black man attacked a handicapped elder white woman, there would have been several willing witnesses to testify in court. I was there, their attorney was not!

The nightmare continues. Ms. Fallon's next escalation: She went to the Hanover Road Association and told them that Mr. Brantley had a shotgun and was firing it all times of the night and day. And of course, she maintained that he had killed her cat! In the meeting in which Near Haven was the focus, they admitted having consulted an attorney. We do not own and have never owned a shotgun!

The next escalation came like a stab to my heart On August 15th 2007 we received a Code enforcement and Inspections Citation stating: "Failure to cease all use of property which exceeds that of a single family dwelling" The date on the citation was August , 2007 to present.

They had attacked my husband's reputation and now they were going after our livelihood -- my 23-year sterling reputation as a clinical practitioner, and my practice!

Why had all of the authorities let this out-of-control woman escalate to this point on the basis of her delusion that my husband killed her cat? Ms. Fallon's assertion and irrational idea (delusion) that my husband killed her cat is absolutely untrue, but delusional persons do not respond to the truth, facts or reason.

Our previous attorney asked Ms. Fallon and Ms. Ambrose about mediation to specify the limits of activity on our property at the last hearing. Of course, they refused. Why, because reasoned behavior is something beyond Ms. Fallon and Ms. Ambrose. Nothing will satisfy them but seeing either my husband have another heart attack and or squashing us like bugs under their feet.

Further acts of harassment over the last two years, include, but are not limited to:

1. taking pictures of clients and guests and friends and relatives; which violates our clients HIPPA rights and our privacy
2. numerous and frivolous complaints to Zoning. My husband left a zoning hearing that started at 10 am and by 1pm, a woman from zoning knocked at our door informing us that Ms. Fallon and Ms. Ambrose had complained about a fallen tree. I explained that we had contacted Barlett Tree Experts, but they had an enormous back log because so many trees had been downed by the recent storm.
3. The Thursday before Labor Day this year, the woman from Zoning came to inform us that Ms. Fallon and Ms. Ambrose called to allege that we were "doing something on Mondays." I do not know how they get away with it because they are prolific liars, but not skillful liars.

Mr. Brantley and I love the property at 14821 HANOVER PIKE. We love working the land, gardening and caring for the orchard. We have created healing spaces on the land in the form of labyrinths. We have expanded the organic garden. We are both in our 60's and have lots of skills and experience which enables us to offer a laundry list of services. I see brochures all the time with laundry lists of services. It seems a common practice. The original concern was Camp Wesley (which is gone) and our using the exterior of the house. Now it has escalated to denying two competent professionals the right to have a home office which is a growing trend today.

Please help us, and give us some protection from the nightmare of living next door to two delusional women.

CLOSING COMMENTS

Robert L. & Astra P. Brantley

1. As trained, certified, and licensed "professional persons", the current use of part of our home as an office is a "use permitted as of right."
2. We have never violated this zoning rule.
3. All legitimate internet-based sharing of services and information is perfectly legal, even from a home-based setting; and is a growing trend across America.
4. Some of our internet-based marketing language was over-aggressive, and perhaps confusing; but internet marketing "copy" does not equate to actual behavior. We have never actually conducted any activity in our home-based-business that violates Baltimore County zoning law (in spite of what might have been advertised online).
5. Objections to the current use of our home and home-office are either ill-informed or ill-motivated (and perhaps based upon old data or mis-allegations of wrong-doing).
6. Former legal counsel failed to appropriately represent our intentions; and failed to structure our original request in a manner best achieved under existing Baltimore County zoning law. We apologize for our choice of counsel.
7. Former legal counsel failed to adequately establish the actionable manner in which our neighboring "complainants" have violated our privacy and the legally-protected privacy of our clinical and clergy clients, our guests, and our friends, by taking unwelcomed and unwarranted illegal photographs of people on our property.
8. We appreciate your patience, and seek your assistance in resolving our zoning issue.

Section 1A01
R.C.2 (Agricultural) Zone

1A01.1 General provisions.

A. Legislative statement of findings.

1. Declaration of findings. It is found:

- a. That Baltimore County is fortunate in that it is endowed with a variety of very productive agricultural soil types which should not be lost unnecessarily to urbanized development;
- b. That the agricultural industry is an integral part of the Baltimore economy and that a continued conversion of agricultural land will continue to undermine this basic industry;
- c. That scattered development is occurring in a sporadic fashion in areas of Baltimore County containing productive agricultural land;
- d. That continued urban intrusion into productive agricultural areas not only destroys the specific area upon which the development occurs but is incompatible with the agricultural use of the surrounding area;
- e. That heretofore Baltimore County has been unable to effectively stem the tide of new residential subdivisions in productive agricultural areas of Baltimore County;
- f. That Baltimore County has certain wetlands along Chesapeake Bay and its tributaries which serve as breeding grounds and nursery areas for the bay's biotic life; and
- g. That Baltimore County possesses numerous areas which are highly suitable for urban development, including residential subdivisions which are not located in areas of productive agricultural land.

- B. Purposes. The R.C.2 zoning classification is established pursuant to the legislative findings above in order to foster conditions favorable to a continued agricultural use of the productive agricultural areas of Baltimore County by preventing incompatible forms and degrees of urban uses.

✓ 1A01.2 Use regulations.

- ✓ A. Preferred use permitted as of right. Agricultural operations, when conducted in accordance with good and reasonable husbandry practices, shall be afforded preferential treatment over and above all other permitted uses in R.C.2 Zones.
- ✓ B. Uses permitted as of right.¹ The following uses only are permitted as of right in all R.C.2 Zones: [Bill No. 178-1979]
 1. Dwellings, one-family detached. [Bill No. 178-1979]

¹ Editor's Note: "Churches and schools for agriculture training," originally included in this section by Bill No. 98-1975, were moved to Section 1A01.2.C by Bill No. 178-1979.

2. Farms and limited acreage wholesale flower farms (Section 404). [Bill Nos. 178-1979; 51-1993]
3. Open space, common. [Bill No. 178-1979]
4. Public schools. [Bill Nos. 63-1980; 47-1982; 47-1985]
5. Streets and ways. [Bill No. 178-1979]
6. Telephone, telegraph, electrical-power or other lines or cables, provided that any such line or cable is underground; underground gas, water or sewer mains or storm drains; or other underground conduits, except interstate or international pipelines. [Bill No. 178-1979]
7. Trailers, provided that any trailer allowed under this provision must be used or stored in accordance with the provisions of Subsection B, C, E or F of Section 415.1 and Section 415.2.A.1 or 415.3.C.1, as applicable. [Bill No. 178-1979]
8. Antennas used by CATV systems operated by companies franchised under Article 25 of the Baltimore County Code, if situated on property owned by the county, state or federal government or by a governmental agency. [Bill Nos. 220-1981; 137-2004]
9. Accessory uses or structures, including, but not limited to, the following:
 - a. Excavations, uncontrolled. [Bill No. 178-1979]
 - b. Farmer's roadside stand and produce stand, subject to the provisions of Section 404.4. [Bill Nos. 178-1979; 41-1992]
 - c. Home occupations (see Section 101). [Bill Nos. 124-1978; 178-1979]
 - ✓ d. Offices or studios of physicians, dentists, lawyers, architects, engineers, artists, musicians or other professional persons, provided that any such office or studio is established within the same building as that serving as the professional person's primary residence at the time of application; does not occupy more than 25% of the total floor area of that residence; and does not involve the employment of more than one nonresident employee. [Bill Nos. 78-1979; 105-1982; 65-1999]
 - e. Parking space, including residential-garage space and space for recreational vehicle (Section 415A). [Bill No. 178-1979]
 - f. Piers, wharves, docks and bulkheads, subject to the provisions of Section 417. [Bill No. 178-1979]
 - g. Radio operator antennas, subject to Section 426A. [Bill Nos. 178-1979; 30-1998]
 - h. Swimming pools, tennis courts, garages, utility sheds, satellite receiving dishes (subject to Section 429) or other accessory structures or uses (subject to the height and area provisions for buildings as set forth in Section 400). [Bill No. 178-1979; Bill No. 71-1987]

THE BRANTLEY GROUP @ NEAR HAVEN

14821 Hanover Pike . Upperco, MD 21155 . Phone 410-625-2900 . Fax 410-625-2919
email brantley@brantleygroup.com . web www.BrantleyGroup.com . www.ExperienceNearHaven.com

MEMORANDUM

9/13/2007

TO: DISTRICT COURT OF MARYLAND FOR BALTIMORE COUNTY
FROM: ROBERT L. BRANTLEY *RJB*
RE: MODIFICATION HEARING
CASE NO: 0804SP041892007; BRANTLEY, ROBERT VS. FALLON, PATTI

In light of my inexperience with the procedures of the Modification Hearing, I have prepared this brief statement (with attachments) for the consideration of the Court. Please find attached:

1. My 9/4/07 memo asking for a postponement/rescheduling of modification hearing
2. My 5/8/07 memo to Patti Fallon & Barbara Ambrose re "good neighbor policy..."
3. My 6/5/07 memo to the Court filing a complaint against my neighbor
4. My 6/25/07 memo to the Court requesting counseling for my neighbor
5. My 7/25/07 memo to the Court requesting help from the Court re my neighbor
6. My 8/10/07 memo to the Hanover Road Association re my neighbor

My request that the Court require counseling for my neighbor is based upon her persistent and escalating "mentally questionable" and illegal behavior that continues to put me at risk, and threaten the peace and tranquility of our community. My wife and I are apparently the targets of her public self-induced anger, growing out of her personal pain and bigoted beliefs concerning feral cats, and cats that she hoards for pets.

Ms. Fallon has also involved her house partner, Barbara Ambrose, in her misguided campaign to "come after me" (her words) for killing/hurting her cast of cats. In a 6/7/07 letter to me signed by Ms. Ambrose, she misrepresented Ms. Fallon's assault of me on my property as a "shouting match", when I never at any time raised my voice to Patti. (Later in that letter she described four of their cats; 3 is the legal limit in Baltimore County; and Patti had earlier disclosed to me that they have owned as many as 14 cats.) Neither Patti nor Barbara have apologized to me for Patti wrongfully assaulting me and accusing me of killing her cat that returned home with injuries of the nature that would have been inflicted by the feral black cat that I was trying to catch.

In an email to me on 5/8/07, Ms. Ambrose also misrepresented that "We couldn't figure out how to open the cage.." in her attempt to excuse their illegally removing property of the Baltimore County Animal Control Unit that was on loan to me. Unit officials told me later that they have never heard of someone illegally removing an animal cage from a neighbor's property in order to prevent that neighbor from catching unwanted cats. In that same email Ms. Ambrose stated "I am sure you think we are a little crazy with this and I am sure that we are being a pain but we mean well." I believe this to be untrue, and a sign of their imbalanced mental state, in need of counsel.

Confused and dangerous people often "mean well", but in her 5/12/07 letter to me Ms. Ambrose clarified her/their attitudes and beliefs that, in part, drive her/their illegal behavior toward me. She wrote: *"It is a bit of a stretch to say that every cat and dog in this county or any other is either leashed or confined to its owner's property particularly in these farm-like environs."* *"... leashing a cat is nearly impossible and that law while enforceable is a bit unrealistic."* She/they have a dangerous disregard for common courtesy and social law; and they need help. The totally false accusation by Ms. Ambrose that I stalked and assaulted her at the Hampstead Walmart is further evidence of the dangerous collaboration between Barbara and Patti that is worthy of Court-ordered counseling for both of them. Their vicious attempt to inflame members of the Hanover Road Association with lies and innuendo makes this an issue of broad community concern, and brings their biased and bigoted behavior within the jurisdiction of the County Court.

THE BRANTLEY GROUP @ NEAR HAVEN

14821 Hanover Pike . Upperco, MD 21155 . Phone 410-625-2900 . Fax 410-625-2919
email brantley@brantleygroup.com . web www.BrantleyGroup.com . www.ExperienceNearHaven.com

MEMORANDUM

9/4/2007

TO: DISTRICT COURT OF MARYLAND FOR BALTIMORE COUNTY
FROM: ROBERT L. BRANTLEY
RE: MODIFICATION HEARING
CASE NO: 0804SP041892007
BRANTLEY, ROBERT VS. FALLON, PATTI

THANK YOU FOR THE NOTICE THAT I RECEIVED BY MAIL TODAY FOR THE MODIFICATION HEARING ON THE ABOVE-REFERENCED CASE, SCHEDULED FOR 9/7/2007.

I am particularly grateful for the Court's decision to revisit the Case, in that Patti Fallon has continued to escalate her dangerous and unwarranted mean-spirited behavior toward me. At a public meeting of the Hanover Road Association last month, Ms. Fallon made a viscous attempt to incite the community against me when she falsely accused me of firing guns in my back yard at night until she was afraid to come out of her home. She said that I was mutilating her cats and denying her the peaceful use of her property. I had to deny her allegations; and informed the twenty or so people in attendance that they may have to be called as witnesses in a law suit against Ms. Fallon for defamation of character. I do not own, and have never discharged a firearm on my property.

Ms. Fallon has also made another attempt to manipulate government authorities in support of her campaign to do me harm. She retained an attorney to file a zoning complaint against me for exceeding the zoning code use of my property (she publicly reported at the HRA meeting that she fully expected the zoning board to rule against me). However, the Code Enforcement Hearing Officer upheld our current use of the property.

Ms. Fallon's absolute intolerance of people who dare to not share her personal preferences and beliefs is, in my opinion, driving her dangerous and escalating behavior in such a manner as to put me at personal risk, and to endanger the community peace. It is my belief that such intolerance cannot be tolerated in an open and pluralistic society that thrives on the mutual commitment of residents to common courtesy and social law. I feel harassed and threatened daily by my neighbor who, in spite of her comments about her concern for my health (she is aware of my heart attack on the property and my ongoing heart condition), persists in her personal and public assaults on my safety. From her personal assault of me on my porch, to the potentially explosive false accusation that I stalked and pushed her female housemate in the Hampstead Walmart, to her viscous lies in an attempt to incite members of the HRA against me, to her manipulative attempts to use the zoning board in her campaign. I am forced to renew my request that the Court order mental health counseling for Ms. Fallon.

Unfortunately, I have been contracted to travel out of town on Thursday for a 2-day work assignment; and I humbly request a postponement and rescheduling of the Modification Hearing. Thank you again for your kind consideration. I sincerely appreciate your help.

ROBERT L. BRANTLEY

14821 Hanover Pike . Upperco, MD 21155 . Phone 410-625-2900 . Fax 410-625-2919
email brantley@brantleygroup.com . web www.BrantleyGroup.com . www.ExperienceNearHaven.com

MEMORANDUM

5/8/2007

TO: PATTI FALLON
BARBARA AMBROSE
14823 Hanover Pike
Upperco, Baltimore County, Maryland 21155

COPY TO: BALTIMORE COUNTY DEPARTMENT OF HEALTH
Animal Control Division

FROM: Robert Brantley

RE: GOOD NEIGHBOR POLICY RE PETS

I hope that this memorandum is received in the spirit with which it is written, that is, in the furtherance of good neighbor policy and practices regarding pets.

Out of respect for your privacy, and your right to enjoy your home without interruption, I have quietly endured the growing proliferation of cats entering onto and crossing my property on a daily basis and at all times of night. I know that you are a cat owner and a protector and provider of care for feline pets. However, due to my wife's allergies, and for other reasons, we consider cats to be a hazard to our health, and therefore do not desire their presence on our property. One of the reasons that we purchased property in Baltimore County was because of its legal prohibition with regards to pets roaming free without a leash.

When I was recently confronted by a large "bushy-tailed" black cat, on my property, and could not enter the front door of my home, I contacted the Baltimore County Animal Control Division to make arrangements for the capture and removal of unwanted and un-collared cats that were increasing in numbers each year. I have never fed, watered, or any way encouraged these animals to frequent my property; neither have I ever mistreated them in any way.

I successfully trapped two of the animals, and they were collected by the County. However, at your request, the animals were released to you, only to be seen again on my property. The large white cat was seen by me on my front porch 2 days after its capture.

The large black "bushy-tailed" cat, that you described as mean and vicious (even to other cats) is still roaming my property daily, and frightening my wife and guests. We agreed that the black cat needs to be removed; but I cannot catch the animal without the cat trap; which you apparently removed from my property today without my permission, in order

to protect a cat that you recognized. Yesterday, I trapped a cat that you did not recognize, and the county authorities promptly collected the animal. If I do not continue to trap and report the capture of un-collared animals to the authorities they will remove the trap from my property, and with it my ability to protect my family from a very real perceived threat. This is not acceptable to me.

One possible solution here would be for you to obey the law and leash your pets when they are not in your house.

Alternatively, I am willing to invest in safe measures to discourage your cats from entering onto and/or crossing my property, destructively playing in our flower beds and vegetable garden, sunning and/or shading on our front porch, hanging out on and under our rear deck, and killing or frightening away the birds that frequent our property (and which we much prefer and enjoy as natural visitors to our grounds). The playful cats have also been observed running across my Lincoln Town Car, and the cars of my guests, chasing birds, and leaving unsightly scratches in the paint that are expensive to repair.

For your information and comfort I have attached data describing some 100% natural and organic products that I intend to use to discourage unwanted "critter" visits to my property. These products are pet-safe, but will suggest to them, through instinctive smell, that a bigger more intimidating animal has taken over the area, and it is therefore not safe for them to tread.

It is my sincere hope that this will facilitate your uninterrupted enjoyment of your pets; but not at the expense of my wife's health and feeling of comfort when tending to her flowers or garden. She was severely frightened by a cat who jumped out of a bush that she was about to tend earlier this week. We have invested significantly in our grounds and in our vegetable garden, yesterday completing the planting of seventeen organic boxes. This investment of time and money can be destroyed in an afternoon by playful cats.

I trust that my efforts to discourage pet visits will work, so that your pets, and the pets of our neighbors, will not end up in the hands of County authorities. Your suggestion about checking the traps daily to see if your cats are captured, is in my estimation not feasible, in that it calls for your entering onto my property at times that may not be comfortable to me or my family; and I don't want to be viewed as being "responsible" for those visits, as the owner of this property.

PLEASE ENJOY YOUR CATS. I very much look forward to enjoying the natural visits of birds and butterflies that frequent and are welcomed to grace our property.

I thought it best that I communicate my thoughts to you in writing, for the sake of clarity and complete understanding. I am faxing a copy of this memo to the County, and I am mailing the original to you to make certain that you receive it, and to avoid disturbing you at your home, or entering your private mailbox. I am uncertain as to what might be a convenient time to call you, and I did not want to be insensitive to your schedules. Peace.

ROBERT BRANTLEY

14821 Hanover Pike . Upperco, MD 21155 . Phone 410-625-2900 . Fax 410-625-2919
email brantley@brantleygroup.com . web www.BrantleyGroup.com . www.ExperienceNearHaven.com

MEMORANDUM

June 5, 2007

TO: DISTRICT COURT OF BALTIMORE COUNTY MARYLAND

FROM: MR. ROBERT L. BRANTLEY
14821 Hanover Pike
Upperco, MD 21155

RE: MS. PATTI FALLON
14823 Hanover Pike
Upperco, MD 21155

THIS MEMORANDUM IS INTENDED TO FILE A FORMAL ASSAULT COMPLAINT AGAINST MY NEIGHBOR, MS. PATTI FALLON, AND TO REQUEST A LEGAL RESTRAINING ORDER TO PREVENT HER FROM APPROACHING ME AND/OR TRESPASSING ON MY PROPERTY.

This complaint and request are made necessary due to the escalating illegal behavior of Ms. Fallon, as follows:

1. In early May of this year Ms. Fallon trespassed on my property and removed a cat cage that was loaned to me by the Baltimore County Department of Health Animal Control Division for the purpose of trapping non-collared (and therefore assumed to be wild) cats that were roaming my property in increasing numbers. (See attached my 5/8/2007 memo to Ms. Fallon and the Animal Control Division) Ms. Fallon did eventually return the cage to ACD; and I am scheduled to receive another cage from ACD this week, because non-collared cats are still roaming my property, and presenting a health threat to me and my family.
2. About mid-May of this year my wife was verbally assaulted by Ms. Fallon, who stood on her property and yelled unpleasant, demeaning, and insulting comments to my wife, accusing her, among other things, of being a "cat killer." My wife was frightened, hurt, and appalled by the behavior of Ms. Fallon, which at the very least violated my wife's right to the quiet enjoyment of our home and property.
3. On Sunday, June 3 of this year I was verbally assaulted by Ms. Fallon on my driveway and on my front porch. I was surprised by Ms. Fallon, who had come onto my property as I removed something from my car trunk. I was startled by her quiet unannounced appearance, and said to her that she frightened me. Her response was: "Good! You deserve it!" She then began to yell at me about her missing cat; and accused me of killing her cat. She yelled that she was going to come after me for hurting her cat. I asked her to leave my property, but she

persisted to yell at me, walking toward me. I turned away from her to enter my house, and she followed me onto the porch and continued to yell that she was coming after me. I told her that I would call the police; but this did not give her pause. At this point I was in reasonable fear for my personal safety. I did not know whether she was armed, but her hand was in her pocket as she yelled at me and followed me in spite of my asking her to leave my property. I entered my home and locked the door to more of her louder yells and accusations and threats, and called the Baltimore County police.

Officer Wilder (badge #4103) of Precinct 3 came to my house and took my report. He gave me an event # 071541171, and went next door to speak with Ms. Fallon. When my wife and I returned home from an evening church meeting we found a note from Officer Wilder stating: "Your neighbor Barb is going to contact you by letter to resolve the cat issue." I don't know whether Officer Wilder spoke with Ms. Fallon, or only with her housemate Barbara Ambrose; but I don't see how a letter is going to resolve the cat issue unless my neighbors obey the law in Baltimore County, which I am told by ACD requires that owners collar and lease their animals (which I suggested in my 5/8/2007 memo).

In any event, Ms. Ambrose did not assault me and my wife – Ms. Fallon did that. The issue is larger than a cat issue. It is the issue of the escalating illegal behavior of Ms. Fallon; and my concern that she is not in control of herself. I BELIEVE HER THREATS. I know from experience that she is capable of sneaking up on me. I assume that she is able to do harm to me. Women, and even school children are capable of using firearms – and they have access to them. Ms. Fallon told me that her brother is active military, and flies killer helicopters. She also told me that her father is willing to shoot and kill one of the cats that I am trying to catch (a large black cat with a bushy tail that chases and attacks her cats). Incidentally, as I sit at my laptop typing this memorandum at 10:45pm the bushy-tailed black cat just strolled across my porch. Earlier tonight (between 9:00pm and 9:30pm) there were gunshots fired on or near my property; and my wife and some visitors saw what appeared to be flashlight beams in the rear of our property.

It is the personal and professional opinion of me and my wife that the escalating behavior of Ms. Fallon should not be ignored or allowed to go unaddressed. My wife is a licensed clinical psychologist, and I am an experienced pastoral counselor. We help emotionally distressed people every day; and we are able to discern potentially dangerous behavior. Ms. Fallon is obviously intolerant of people who do not share her fondness for cats; she is willing to impose her desires on others, though she has no right to do so, and her imposition is in violation of the law; and her extreme language reflects a possible hidden hatred for people of certain religious preferences. The behavior of Ms. Fallon puts us both in reasonable fear for our personal safety.

It is my desire, and responsibility, to file a formal complaint against Ms. Fallon, and to request a legal restraining order to keep her from making contact with us or trespassing upon our property.

ROBERT BRANTLEY

14821 Hanover Pike . Upperco, MD 21155 . Phone 410-625-2900 . Fax 410-625-2919
email brantley@brantleygroup.com . web www.BrantleyGroup.com . www.ExperienceNearHaven.com

MEMORANDUM

June 25, 2007

TO: JUDGE A. N. WILLIAMS
DISTRICT COURT OF BALTIMORE COUNTY MARYLAND

FROM: MR. ROBERT L. BRANTLEY
14821 Hanover Pike
Upperco, MD 21155

RE: FINAL PEACE ORDER
BRANTLEY, ROBERT vs FALLON, PATTI
Case No. 0804SP041892007
Date: 06/25/2007 9:28a.m.

THIS MEMORANDUM IS INTENDED TO APPEAL YOUR DECISION TO NOT RULE ON MY FORMAL REQUEST FOR PATTI FALLON "TO GO TO COUNSELING."

When, in your courtroom, I suggested that Ms. Fallon needed counseling, because it was my opinion that she was a danger to society, you indicated that you did not have the authority to order counseling, but only to order her to stay off my property. I indicated that my concern was larger than the issue of trespass; and that it was the escalating irrational behavior of Ms. Fallon that concerned me. I suggested that her behavior was reminiscent of behaviors in our society that, when gone unreported and unaddressed, can result in the kind of violent tragedies that have beset America in recent months. I expressed what I perceived to be our mutual frustration that you were not able to address my concerns.

I was reminded by examination of the PETITION FOR PEACE ORDER that I filed with the Court on 6/11/07 (Case No. SP4189-07), that under point number four (4) "I want the Respondent to be ordered", I checked the box that said "To go to counseling." It was my assumption, therefore, that this was within my legal rights to request, and within your jurisdiction to grant or deny. It was primarily for this reason that I pursued my original Petition, and returned to your court for a second time when Ms. Fallon was not served for the first hearing scheduled for 6/18/07. (see attachments)

With all due respect, Judge Williams, I feel that it is my legal right and responsibility to request that Patti Fallon receive counseling for her dangerously escalating behavior. It is my opinion that her irrational behavior is based upon her unhealthy mental attitude of intolerance, hatred, and a disdain for societal laws that protect us all from neighbor abuse.

ROBERT BRANTLEY

14821 Hanover Pike . Upperco, MD 21155 . Phone 410-625-2900 . Fax 410-625-2919
email brantley@brantleygroup.com . web www.BrantleyGroup.com . www.ExperienceNearHaven.com

MEMORANDUM

July 25, 2007

TO: JUDGE A. N. WILLIAMS
DISTRICT COURT OF MARYLAND FOR BALTIMORE COUNTY

JUDGE ROBERT J. STEINBERG
DISTRICT COURT OF MARYLAND FOR BALTIMORE COUNTY

FROM: MR. ROBERT L. BRANTLEY
14821 Hanover Pike
Upperco, MD 21155

RE: FINAL PEACE ORDER
BRANTLEY, ROBERT vs FALLON, PATTI
Case No. 0804SP041892007
Date: 06/25/2007 9:28a.m.

TEMPORARY PEACE ORDER
AMBROSE, BARBARA D vs BRANTLEY, ROBERT
Case No. 0804SP043282007
Date: 07/20/2007 2:42p.m.

MY JUNE 25, 2007 MEMORANDUM TO JUDGE WILLIAMS WAS INTENDED TO APPEAL HER DECISION TO NOT RULE ON MY FORMAL REQUEST FOR PATTI FALLON "TO GO TO COUNSELING." (please see attachment)

THIS MEMORANDUM IS INTENDED TO ALERT JUDGE WILLIAMS AND JUDGE STEINBERG OF MY STRONG BELIEF THAT PATTI FALLON AND HER HOUSEMATE BARBARA AMBROSE ARE A POTENTIAL THREAT TO SOCIETY AND IN NEED OF COUNSELING. (I use the term housemate because, while I know they live together, I am uncertain of their personal relationship.)

In brief, Your Honors, it is my belief that Ms. Fallon and Ms. Ambrose have conspired to file a false report of stalking and assault to the Court in an effort to "come after me" due to my successful action to legally restrain Ms. Fallon's illegal behavior. (see attachment)

The complaint filed by Ms. Ambrose is completely false. (see attachment) It is an abuse of tax-payer privilege, and a misuse of tax-payer dollars. It is a lie, an attempt to slander and discredit me, and possibly a strategy to do me harm through the illegal manipulation of the Courts. These women are bigots, they are not restrained by common courtesy or by law, and they are willing to lie to civil authorities and manipulate the Courts. **HELP!!**

THE BRANTLEY GROUP @ NEAR HAVEN

14821 Hanover Pike . Upperco, MD 21155 . Phone 410-625-2900 . Fax 410-625-2919
email brantley@brantleygroup.com . web www.BrantleyGroup.com . www.ExperienceNearHaven.com

MEMORANDUM

8/10/2007

TO: GLENN ELSEROAD, President, Hanover Road Association
FROM: Bob Brantley
RE: SUPPORT OF HANOVER ROAD ASSOCIATION

GREETINGS IN THE PRECIOUS NAME OF JESUS!

Glenn, thank you for the invitation to the Wednesday night meeting of the Hanover Road Association. I was encouraged by the warm reception of those in attendance; but I regret the unfortunate behavior of my neighbor near the end of the meeting. It is not my desire to involve the Association in any possible future legal conflict between me and my neighbor; though I welcome the opportunity to sit with them and members of the Association's Board to try to "keep the peace" between neighbors. We are strong proponents of "out of court" Bible-based mediation. In fact, we have been actively certified as professional Christian mediators for many years by PEACEMAKER MINISTRIES in Billings, Montana; and mediation is a vital part of our ministry.

However, as my neighbor reported at the Association meeting, she has already initiated action against me with the zoning authorities of Baltimore County. We have been issued a Correction Notice and a Citation that threaten the future of our ministry and ability to earn a living in this community. As President of the Association, you will receive other information relative to this process. In the meantime, I would very much appreciate the support of the Association with regards to what you know about us, our property, and what we do. Although, to my knowledge, neither you nor members of the Association who attended the last meeting have been the recipients of our services, you have visited our home and grounds (and reported your observations at the meeting), attendees heard my report and responses to questions, and many have observed from a distance (and are free to visit and observe up-close) our activity on the property that is consistent with the promotion of good agricultural operations, a major concern of the Zoning Board.

On Wednesday, 8/15/2007, at 9:00am there is a public hearing scheduled in Room 116 of the Baltimore County Office Building located at 111 Chesapeake Avenue in Towson, Maryland. I am told that the Hearing Officer will conduct the hearing and adjudicate the Citation. We have informed zoning authorities of our position that we do not and have not exceeded the permitted use of our home. We have already taken steps to correct the appearance of violations by amending our Internet advertising (which appears to have been a major source of concern for zoning representatives). I believe that zoning representatives were, in part, misled by our websites, but primarily were misled by the lies of our neighbor (as she attempted to mislead the Association with her vicious lies). I need, desire, and am formally requesting the support of members of the Association at the hearing, hopefully in person, but at the very least by way of written statements.

I look forward to becoming an active member of the Association, for the betterment of this community. I also look forward to visits to NEAR HAVEN by other members of the Association who have an interest in what we do, especially in the area of promoting best practices in home-based agricultural operations. Upon their visit they will see that the exterior of our property is without doubt a beautiful single family residence, with well maintained grounds, featuring agricultural elements covering half of our property (orchard, organic above-ground garden, sophisticated composting area, trees, shrubbery, flowers, and plants that attract large numbers to birds and butterflies). There is a "property identification" sign that existed when we purchased the property; and we added a smaller sign near our mailbox because the original sign is set so far back into the property that visitors traveling on Hanover Pike could not see the sign in time to safely avoid traffic lanes in time to turn off to our property. The former owners identified the property as "Crossing Goose Acres" because of the geese that fly over the property (and sometimes walk on the property) daily. We identify the property as NEAR HAVEN because it captures the spirit of our home and our ministry. They will also notice on our larger sign names including the Universal Peacemakers Foundation, Bridge Point Ministries, and The Brantley Group. The Universal Peacemakers Foundation is our private foundation which promotes world peace, and is the sponsor and host of Bridge Point Ministries @ NEAR HAVEN. Bridge Point Ministries is our "private brand" for the ministry work that we do on behalf of individuals, couples, families, churches, clergy, and Christian clinicians. THE BRANTLEY GROUP is our private family business name. It involves me and my wife, Astra. It has no staff. It provides management, planning, and other services for the Foundation, the Ministry, and for NEAR HAVEN.

My wife and I are law abiding tax paying citizens who promote the preferred uses of private residential property in the RC-2 zones of this county, namely "Agricultural operations, when conducted in accordance with good and reasonable husbandry practices, shall be afforded preferential treatment over and above all other permitted uses in R.C.@ Zones". Half of our property qualifies for "Preferential treatment". We purchased this property, in part, because we wanted the opportunity to garden and to share with others the benefits of home gardening (even if on a micro scale). We more than doubled the size of the original above-ground organic garden that was a part of the property. We removed the old composting unit that had failed, and replaced it with an enlarged composting area using "best practices" of a blend of traditional techniques and higher technology. We also enclosed the garden to resist erosion, and we beautified the garden and compost area with flowers and butterfly bushes that discourage certain animals from damaging the garden beds. The garden beds are fertilized by organically produced "compost tea", and a method of soil tilling known as the "French Intensive" where a nutrient-rich ground cover is turned under to organically fertilize the soil. Other organic compost material is used to fertilize the fruit orchard, which is also organically protected by the spraying of a water and powdered clay emulsion that minimizes or eliminates the need to use pest-resisting chemicals, thus protecting our neighbors from exposure.

Our dreams involve visions of whole health living for the human mind, body, and spirit; and the ministry work that we do on the interior and exterior of NEAR HAVEN is being threatened by the disingenuous motivation of an emotionally disturbed neighbor whose

6c

property does not reflect the preferred use of RC-2 zoned property. Her desire to own or care for more than a dozen cats is a matter of choice; but her refusal to obey county law (which requires the collaring and leashing of pets) promotes an unhealthy environment in an unfenced agricultural community; and it is the explosive growth of her cat colony that is at issue.

Her cats procreate without control (two litters, a total of nine cats, have been born on our property since we have been here); they will run amuck; they damage flower and garden beds; they chase away birds; they litter; and cause humans who suffer from allergens great distress. Such is the case with my wife who is extremely allergic to cats. Please be clear that our neighbor is Ms. Patti Fallon and Ms. Barbara Ambrose. We know that they live together; and that they share an affinity for cats; and that they have a serious disregard for law, and for the property rights, personal feelings, and preferences of others who do not share their feelings and preferences (this is a dictionary definition of a bigot).

The real problem with our neighbor is that she expects me to let her use my property in the care of her cats (and other cats who find their way to her property and mine) to the detriment of my quiet enjoyment of my property. Perhaps unknown to you, there are serious issues with the personal statements and actions of our neighbor, that reveal the root of her complaint, and the potentially devastating danger to a community that cannot survive without common courtesy and social law.

Serious questions demand an answer. Why would a woman publicly lie in a community meeting, falsely accusing her neighbor of firing guns in the back yard at night until she is afraid to come out? Why would she blame her cat's injuries on her neighbor, when she knows that there is still a dangerous wild cat in the area that consistently attacks and injures here cats; and that caused me to ask for help from the County Animal Control Unit to trap the animal, after he refused to let me enter my front door one day? I do not like or own guns or cats; but I respect and am tolerant of the rights of my neighbors to do so, within the boundaries of common courtesy and social law. Should I be harassed because of this? Should my ministry & livelihood be threatened as a result? Is this fair?

Please know, Brother Glenn, that in spite of the current conflict with our neighbor, we are not discouraged with regards to the appropriateness of our home-based ministry in this County or our livelihood in this community. We are here to stay! We will continue to be a blessing to the people whom the Lord gives us the privilege and opportunity to serve; and we will persist in our efforts to teach and demonstrate the efficacy of home-based gardening and other agricultural operations. We will not let "questions of zoning" mitigate the "answers of peacemaking" that we bring by virtue of our presence on Hanover Pike. We will meet every challenge, by the grace of God, and within the laws that reflect His Sovereignty over our lives. We are encouraged by your graciousness, and by the private comments of other members of this community and the Hanover Road Association. Finally, Brother Glenn, please join my wife and I, and our friends and supporters, in prayer for our neighbor who grieves the injuries to her pets, in part due to her failure to protect them by obeying County law. Often, when people are grieving, the anger that they feel seeks a target. We are apparently the undeserving targets of anger.

From: Krysundra Cannington
To: Matthews, Kristen
CC: Shelton, Theresa
Date: 6/18/2009 1:12 PM
Subject: 09-042-SPHX

Hi Kristen!

How's everything going? I hope you're having a great day!

I was just looking through my "Appealed/Waiting for file" folder and came across case number 09-042-SPHX (Robert Brantly). I received an Intention to Participate in this case from Carroll Holzer on April 6, 2009. I do not have a notice of appeal but the intention to participate indicates that Holzer's clients wish to participate in the matter before the Board. Just to follow up, I have not received this file from you so I wanted to ask if an appeal had ever been filed and, if so, when you expect to have the appeal completed. (NO RUSH!!!)

I have not received any calls on this from anyone. I just wanted to make sure I wasn't missing something.

Let me know what you come up with and if there's anything I can do to help you out.

Thank you for everything you do! (I'm sure you don't hear that enough!)

Sunny :)

6/19 - Kristen stopped by and dropped off a copy of the Petition & Notice of Appeal. She is working on the file and should have it finished soon.

From: Debra Wiley
To: Matthews, Kristen
Date: 02/11/09 12:17:45 PM
Subject: Re: Case No. 09-0042-SPH (Hold on Calendar for 2/25)

Kristen,

This info. might help you — your last email to me on 1/26 says you gave him a tentative date of 2/25 and he will let you know when he hears from Sebastian whether that works so I'm assuming you were referring to Sterling on behalf of Carroll Holzer.

Debbie Wiley
 Legal Administrative Secretary
 Office of the Zoning Commissioner
 105 West Chesapeake Avenue, Suite 103
 Towson, Md. 21204
 410-887-3868
 410-887-3468 (fax)
dwiley@baltimorecountymd.gov

>>> Kristen Matthews 02/11/09 12:02 PM >>>

I verbally talked to the attorney about holding the date but, without the file, I can't recall who that was haha, but I haven't heard back from anyone.

>>> Debra Wiley 2/11/2009 11:38 AM >>>

Hi Kristen,

Can you give me a status on the above? On the February calendar, there's a hold pending per atty's. Our office has the file and we're not sure if this was scheduled if a hearing notice went out ...

Please advise. Thanks.

Debbie Wiley
 Legal Administrative Secretary
 Office of the Zoning Commissioner
 105 West Chesapeake Avenue, Suite 103
 Towson, Md. 21204
 410-887-3868
 410-887-3468 (fax)
dwiley@baltimorecountymd.gov

2-12 Per Brie contact re: their status re: 2/25
both attorney's re: everything on to his knowledge
2-12 Per Sterling, everything on to his knowledge
2-13 Left Sterling voice mail - Conf. Sebastian did not get out this afternoon 2/13
2-12 Left voice mail w/ Sebastian 1:50 P.M. per Sebastian - Conf. OK for 2/25.
2-13 Per's call from James
Deb W.

tent
2/25**Debra Wiley - Re: March Calendar**

From: Kristen Matthews
To: Wiley, Debra
Date: 01/26/09 10:46:15 AM
Subject: Re: March Calendar

Hi Debbie,

Ok that sounds good, I actually gave him a tentative date of February 25th, and he will let me know when he hears from Sebastian whether that works. Thanks a lot.

>>> Debra Wiley 1/26/2009 10:43 AM >>>
Hi Kristen,

I spoke to Bill about the March calendar and he advised that he needs to talk to his wife first. I'd like to make it as easy for you as possible so I'm not sure how you want to handle 2009-0042-SPHX. If it's easier to just wait a day or two or just give them tentative dates until you hear from me - whatever works for you. I'm waiting to hear back from Tom also.

Thanks.

Debbie Wiley
Legal Administrative Secretary
Office of the Zoning Commissioner
105 West Chesapeake Avenue, Suite 103
Towson, Md. 21204
410-887-3868
410-887-3468 (fax)
dwiley@baltimorecountymd.gov

From: Debra Wiley
To: Matthews, Kristen
Date: 01/15/09 10:35:30 AM
Subject: Fwd: Case 2009-0042-SPHX - 14821 Hanover Pike - (Brantley)

Good Morning Kristen,

It's been a month and I just wanted to check to see if there's been any change since our previous e-mail (see attached).

Thanks in advance and have a great day !

Debbie Wiley
Legal Administrative Secretary
Office of the Zoning Commissioner
105 West Chesapeake Avenue, Suite 103
Towson, Md. 21204
410-887-3868
410-887-3468 (fax)
dwiley@baltimorecountymd.gov

Debra Wiley - Re: Case 2009-0042-SPHX - 14821 Hanover Pike - (Brantley)

From: Kristen Matthews
To: Wiley, Debra
Date: 12/15/08 2:15 PM
Subject: Re: Case 2009-0042-SPHX - 14821 Hanover Pike - (Brantley)

Hi Debbie,

I haven't heard anything else about this case since that September date. If I here anything I'll let you know.

>>> Debra Wiley 12/15/2008 1:07 PM >>>

Hi Kristen,

The above-referenced was held on 9/24 and was to be continued.

After being contacted by Sterling of Holzer's office, per Bill (on 11/13), I left Sterling a voice mail that he was to contact Sebastian Cross, get dates from him & Holzer and then to contact you to schedule a continuance.

Have you heard anything from anyone ? Thanking you in advance.

Debbie Wiley
Legal Administrative Secretary
Office of the Zoning Commissioner
105 West Chesapeake Avenue, Suite 103
Towson, Md. 21204
410-887-3868
410-887-3468 (fax)
dwiley@baltimorecountymd.gov

From: Debra Wiley
To: Livingston, Jeffrey
Date: 09/22/08 1:41:51 PM
Subject: Comment Needed

Hi Jeff,

Bill has a hearing scheduled for Wednesday, 9/24 @ 9 AM and we've just received the case file. He'd like a DEPRM comment, if possible. I have provided a case description as follows for your convenience:

CASE NUMBER: 2009-0042-SPHX

14821 Hanover Pike (Zoned R.C. 2)

Location: E side of Hanover Pike, 4,900 feet S of the c/l of Emory Road

4th Election District, 3rd Councilmanic District

Legal Owner: Robert L. & Astra Brantley

SPECIAL HEARING to permit a modified parking plan and for such other further relief as may be deemed necessary by the Zoning Commissioner.

SPECIAL EXCEPTION to permit use of an existing building for religious worship and camp as a spiritual religious retreat center.

Hearing: Wednesday, 9/24/2008 at 9:00:00 AM Jefferson Building, 105 West Chesapeake Avenue, Room 104

Thanks and have a great day !

Debbie Wiley
Legal Administrative Secretary
Office of the Zoning Commissioner
105 West Chesapeake Avenue, Suite 103
Towson, Md. 21204
410-887-3868
410-887-3468 (fax)
dwiley@baltimorecountymd.gov

11-13 Left Sterling voice mail

Per Bice his to contact ~~Sterling~~ and get date
and time known to schedule continuance.

Sterling hearse my BW

J. Carroll Holzer's office

410-825-6961

Case 09-042-SPHX
Heard 9-24-08 & cont'd
when does BW want
to hear again?

11/10/08

2pm

BALTIMORE COUNTY, MARYLAND

Inter-Office Correspondence

TO: W. Carl Richards, Jr., Supervisor
Zoning Review Office, DPDM

DATE: September 25, 2008

FROM: William J. Wiseman, III, Zoning Commissioner
Zoning Commissioner's Office

SUBJECT: **PETITIONS FOR SPECIAL HEARING AND SPECIAL EXCEPTION**
E/S Hanover Pike, 4,900' S c/line of Emory Road
(14821 Hanover Pike)
4th Election District - 3rd Council District
Robert Brantley, et ux - Petitioners
Case No. 2009-0042-SPHX

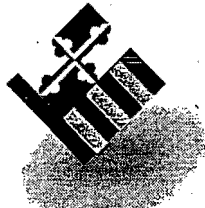
This will confirm my conversation with you regarding this case and other hearings that are scheduled before me in which I have no knowledge that an active zoning enforcement violation is pending. As you know, we receive cases several days before a hearing and should we discover that an enforcement case is pending, contacts are made with Mike Mohler's office in order that we can retrieve copies of the zoning enforcement officer's file.

In the past, zoning files came to this Commission with red lettering labeled "violation pending" written across the file cover. In those instances, there would be a copy of the zoning enforcement file usually within a red cover contained within the zoning file and if Hearing Officer Rick Wisnom made a decision or issued an Order, that would also be present.

I would very much like to return to those days. It is troublesome for our legal secretaries to make contact to the Code Enforcement Office, already burdened with numerous calls throughout the day and time is usually of the essence since the hearings are within a day or two of our receiving files.

Please let me know if I can be of any assistance in resolving this type of problem.

WJW:dlw



BALTIMORE COUNTY

M A R Y L A N D

JAMES T. SMITH, JR.
County Executive

WILLIAM J. WISEMAN III
Zoning Commissioner

February 13, 2009

Sebastian Cross, Esquire
Gildea & Schmidt, LLC
600 Washington Avenue, Ste. 200
Towson, MD 21204

J. Carroll Holzer, Esquire
Holzer & Lee
508 Fairmount Avenue
Towson, MD 21286

RE: **PETITIONS FOR SPECIAL HEARING AND SPECIAL EXCEPTION**
E/S Hanover Pike, 4,900' S c/line of Emory Road
(14821 Hanover Pike)
4th Election District - 3rd Council District
Robert Brantley, et ux - Petitioners
Case No. 2009-0042-SPHX

Dear Counsel:

This letter is to confirm that the captioned matter has been scheduled for further testimony on Wednesday, February 25, 2009, at 9:00 A.M., in **Room 104**, of the Jefferson Building, 105 West Chesapeake Avenue, Towson, Maryland 21204. The Petitioners case in chief was heard and completed on September 24, 2008. It is anticipated that we will begin the proceedings with the Protestants' concerns. By copy of this letter, I am informing all parties who appeared and participated at the September 24, 2008 hearing of this new date.

Please do not hesitate in contacting my office if you need further clarification.

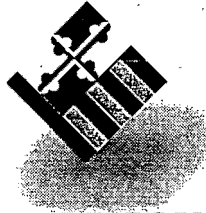
Very truly yours,

A handwritten signature in black ink, appearing to read "William J. Wiseman III", written over a circular stamp.

WILLIAM J. WISEMAN, III
Zoning Commissioner
for Baltimore County

WJW:dlw

- c: Robert L. and Astra Brantley, 14821 Hanover Pike, Upperco, MD 21155
Matthew T. Allen, P.E., Bohler Engineering, P.C, 810 Gleneagles Court, Suite 300,
Towson, MD 21286
Barb Ambrose and Patricia R. Fallon, 14823 Hanover Pike, Upperco, MD 21155
S. Glenn Elseroad, 5423 Mt. Gilead Road, Reisterstown, MD 21136
George P. Neubeck, Jr., 14301 Hanover Pike, Reisterstown, MD 21136
Carol D. Isaac, 15003 Hanover Pike, Upperco, MD 21155
Sandra M. Brown, 5135 Frye Road, Upperco, MD 21155
Robert Slaterbeck, 13929 Old Hanover Road, Reisterstown, MD 21136
Kristen Matthews, Office of Zoning Review, DPDM



BALTIMORE COUNTY

M A R Y L A N D

JAMES T. SMITH, JR.
County Executive

January 20, 2009

WILLIAM J. WISEMAN III
Zoning Commissioner

Sebastian Cross, Esquire
Gildea & Schmidt, LLC
600 Washington Avenue, Ste. 200
Towson, MD 21204

J. Carroll Holzer, Esquire
Holzer & Lee
508 Fairmount Avenue
Towson, MD 21286

RE: PETITIONS FOR SPECIAL HEARING AND SPECIAL EXCEPTION
E/S Hanover Pike, 4,900' S c/line of Emory Road
(14821 Hanover Pike)
4th Election District - 3rd Council District
Robert Brantley, et ux - Petitioners
Case No. 2009-0042-SPHX

Dear Counsel:

We are now into another year and despite gentle reminders, I have yet to be informed of a new date in order to continue this hearing and bring it to a conclusion.

I ask you both to check with your clients and witnesses that may be required and use best efforts to reach an agreed date. Please contact Kristen Matthews at 410-887-3391 to reschedule this matter at your earliest opportunity.

Very truly yours,

A handwritten signature in black ink, appearing to read "William J. Wiseman, III", written over a horizontal line.

WILLIAM J. WISEMAN, III
Zoning Commissioner
for Baltimore County

WJW:dlw

c: Kristen Matthews, Office of Zoning Review, DPDM

CASE NAME Brantley
CASE NUMBER 2009-0542-SPHX
DATE 9-24-08

[illegible]

CASE NAME CONFIDENTIAL
CASE NUMBER hears 2009-0042-
DATE 2-25-09 SPRK

[illegible]

CASE NAME Confirmation
CASE NUMBER Heavy 2009-0042
DATE 2-25-09 SPHX

CASE NAME Confirmation
CASE NUMBER Heavy 2009-0042
DATE 2-25-09 SPHX

[illegible]

CASE NAME Brantley
CASE NUMBER 2009-0062-SPHX
DATE 9-24-08

CASE NAME Brantley
CASE NUMBER 2009-0062-SPHX
DATE 9-24-08

[illegible]



Maryland Department of Assessments and Taxation
BALTIMORE COUNTY
Real Property Data Search (2007 vw5.1)

[Go Back](#)
[View Map](#)
[New Search](#)

Account Identifier: District - 04 Account Number - 2300004329

Owner Information

Owner Name:	BRANTLEY ROBERT L BRANTLEY ASTRA	Use:	RESIDENTIAL
Mailing Address:	PO BOX 146 UPPERCO MD 21155-0146	Principal Residence:	YES
		Deed Reference:	1) /20649/ 127 2)

Location & Structure Information

Premises Address	Legal Description
14821 HANOVER PIKE	2.9539 AC 14821 HANOVER PIKE 4900FT S OLD HANOVER RD

Map	Grid	Parcel	Sub District	Subdivision	Section	Block	Lot	Assessment Area	Plat No:	MS
31	10	353					2	1	Plat Ref:	

Special Tax Areas

Town	
Ad Valorem	
Tax Class	

Primary Structure Built	Enclosed Area	Property Land Area	County Use
1999	3,026 SF	2.95 AC	04
Stories	Basement	Type	Exterior
1 1/2	YES	STANDARD UNIT	SIDING

Value Information

	Base Value	Value	Phase-in Assessments	
		As Of	As Of	As Of
		01/01/2007	07/01/2008	07/01/2009
Land	71,700	143,400		
Improvements:	267,290	452,230		
Total:	338,990	595,630	510,082	595,630
Preferential Land:	0	0	0	0

Transfer Information

Seller: GARRETT CRAIG L	Date: 09/07/2004	Price: \$568,000
Type: IMPROVED ARMS-LENGTH	Deed1: /20649/ 127	Deed2:
Seller: GARRETT CRAIG L	Date: 10/18/2001	Price: \$0
Type: NOT ARMS-LENGTH	Deed1: /15672/ 96	Deed2:
Seller: MORGAN JOAN W	Date: 11/20/1998	Price: \$85,000
Type: UNIMPROVED ARMS-LENGTH	Deed1: /13312/ 146	Deed2:

Exemption Information

Partial Exempt Assessments	Class	07/01/2008	07/01/2009
County	000	0	0
State	000	0	0
Municipal	000	0	0

Tax Exempt: NO
Exempt Class:

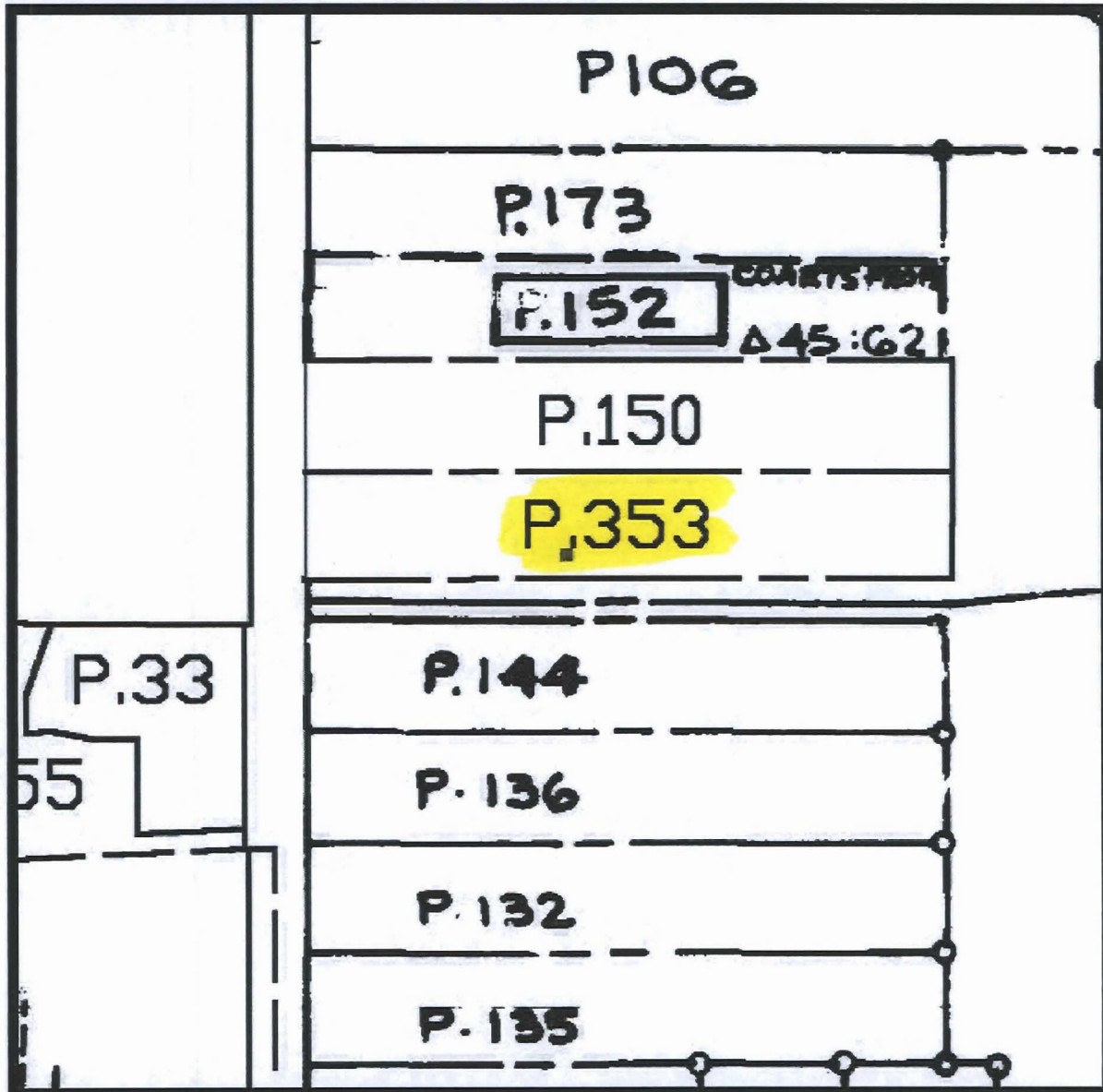
Special Tax Recapture:
 * NONE *



Maryland Department of Assessments and Taxation
BALTIMORE COUNTY
Real Property Data Search

Go Back
View Map
New Search

District - 04 Account Number - 2300004329



Property maps provided courtesy of the Maryland Department of Planning ©2004.
For more information on electronic mapping applications, visit the Maryland Department of Planning web
site at www.mdp.state.md.us/webcom/index.html



YIRKA PROPERTY (PDM File/Project # MS 05023)

0402022800

1600011102

0419027560

14909

0418048311

14903

0405070010

1800013387

14901

Pt. Bk. 45 Folio 62

14825

1800013388

2300004328

14823

0416075540

Flood Zone X

2300004329

14821

4 ED
031B2
RC 2
NW 22-K
3 CD

HANOVER PIKE

0412060330

14809

2300004324

14808

0412060320

14807

0412060420

0412074330

0412074400

0403050620

0402085227

0423015778

1700003940

Liberty Hydrology 100 Foot Stream Buffer

1800011430

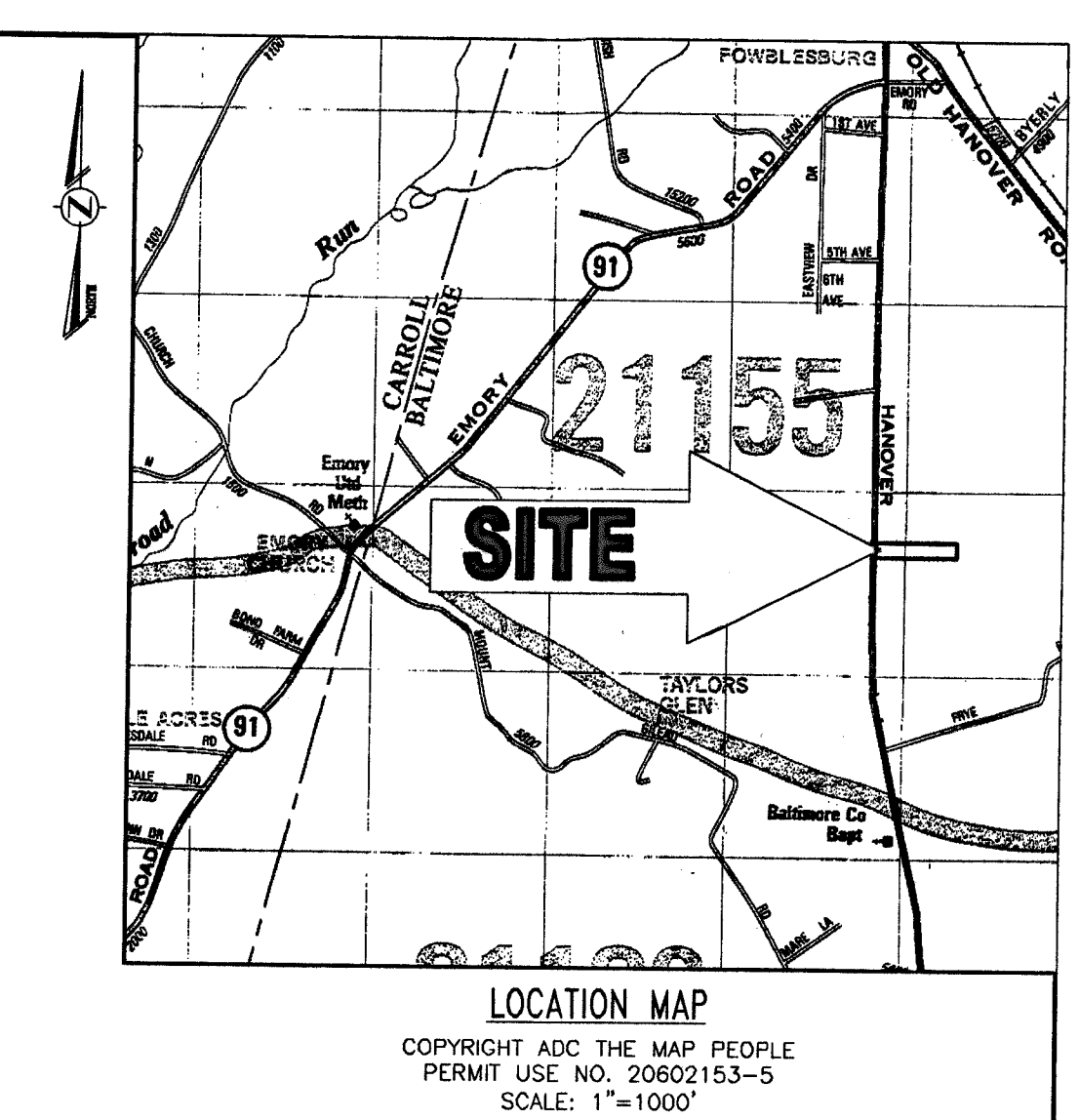
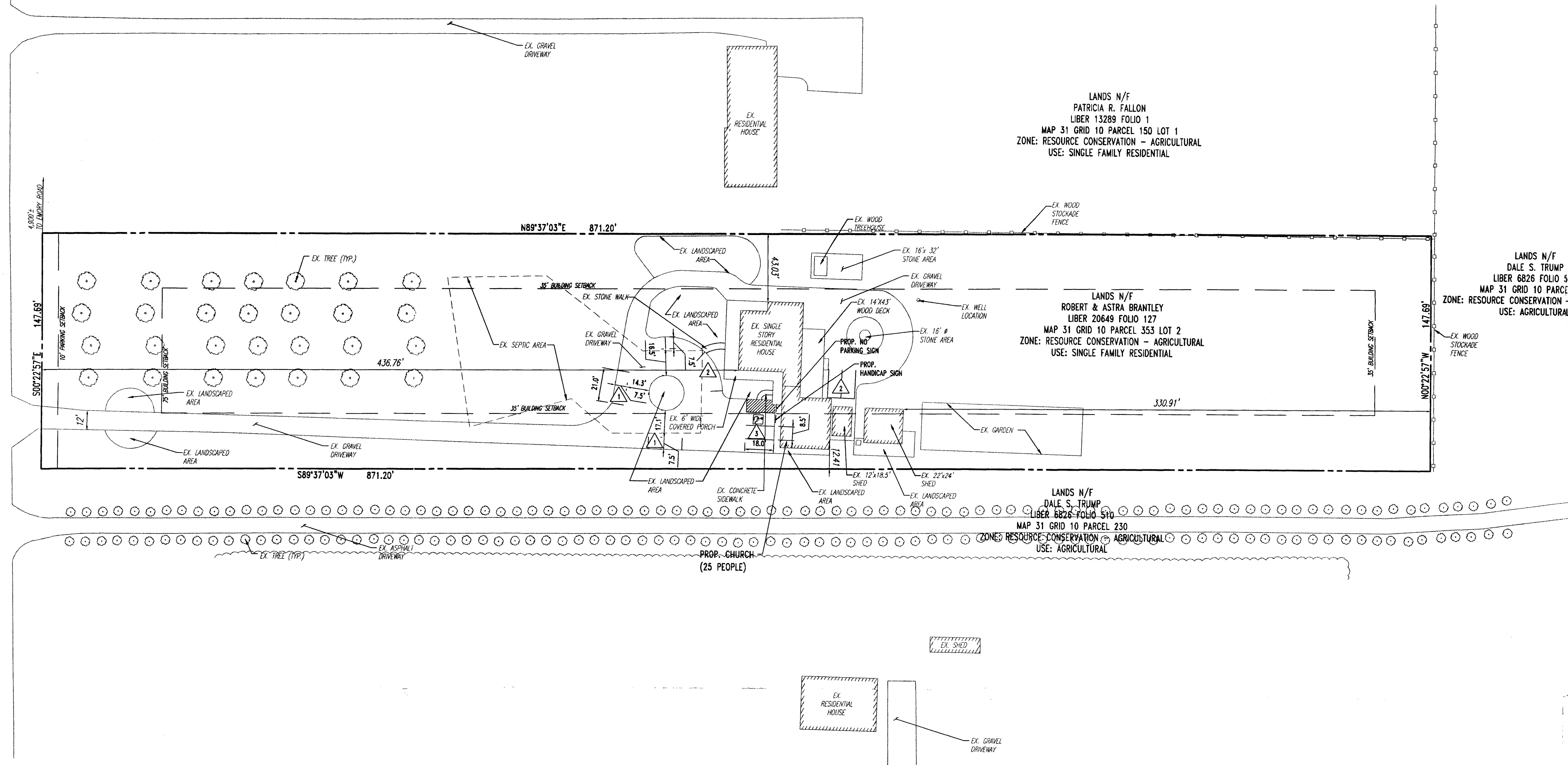
1800003321

Pt. Bk. 42 Folio 112

1800002666

2009-0042-SPHX

HANOVER PIKE-MD. ROUTE 30



SITE INFORMATION

- 1.) SITE ADDRESS: 14821 HANOVER PIKE (MD ROUTE 30) UPPERCO, MD 21155
- 2.) ZONING: R.C.2 (RESOURCE CONSERVATION - AGRICULTURAL) Map# 031B2
- 3.) SITE AREA: PARCEL 353-LOT 2: 128,502 SF OR 2.95 AC
- 4.) EXISTING FLOOR AREA: 3,026 S.F.
- 5.) PROPOSED FLOOR AREA: 3,026 S.F.
- 6.) DEED REFERENCE: LIBER 20649, FOLIO 127
- 7.) OWNER: ROBERT & ASTRA BRANTLEY
14821 HANOVER PIKE
UPPERCO, MD 21155
- 8.) TAX ACCT. NO.: 04-2300004329
- 9.) ELECTION DISTRICT: 4TH (FOURTH)
- 10.) COUNCILMANIC DISTRICT: 3RD (THIRD)
- 11.) WATERSHED: GWYNNS FALLS
- 12.) SEWERSHED: 67
- 13.) CENSUS TRACT: 404201
- 14.) THERE ARE NO WETLANDS LOCATED WITHIN THIS SITE BOUNDARY.
- 15.) THE SITE IS NOT WITHIN A WATER, SEWER OR TRANSPORTATION BASIC SERVICES DEFICIENT AREA.
- 16.) EXISTING USE: SINGLE FAMILY DWELLING
- 17.) PROPOSED USE: SINGLE FAMILY DWELLING WITH PLACE OF RELIGIOUS WORSHIP
- 18.) THE SITE IS NOT LOCATED WITHIN THE 100 YEAR FLOOD PLAIN PER FEMA MAP #2400100-0205-B, DATED MARCH 2, 1981
- 19.) PERMITTED BUILDING HEIGHT: 35'

ZONING NOTES

- 1.) SITE AREA: 128,502 SF OR 2.95 AC
- 2.) ACCESS POINTS:
A. EXISTING: ONE (1) 12' PAVED ENTRANCE OFF HANOVER PIKE (TO REMAIN)
B. PROPOSED: NO NEW ENTRANCES ARE PROPOSED
- 3.) PARKING:
REQUIRED:
SINGLE FAMILY DWELLING:
2 SPACES PER DWELLING UNIT
1 D.U. x 2 = 2 SPACES
PLACE OF WORSHIP:
1 SPACES PER 4 SEATS
25 SEATS/4 x 1 = 6.25 OR 7 SPACES
TOTAL SPACES REQUIRED = 9 SPACES
PROVIDED: 9 TOTAL SPACES (INCLUDING ONE (1) HANDICAP SPACE)
- 4.) REQUIRED SETBACKS:
A. BUILDING:
R.C.2. ZONE:
FRONT: 75' 436.78' (EX.)
SIDE (NORTH): 35' 43.03' (EX.)
SIDE (SOUTH): 35' 12.41' (EX.)
REAR: 35' 330.91' (EX.)
- 5.) ZONING HISTORY:
A. CASE NO. 00-284-A (DATED 2/4/2000) - VARIANCE APPROVED TO PERMIT AN EXISTING SINGLE FAMILY DWELLING ADDITION AND GARAGE TO HAVE A SIDE YARD SETBACK OF 3 FEET IN LIEU OF THE PERMITTED 35 FEET.

ZONING RELIEF REQUESTED

1.) SPECIAL EXCEPTION - SECTION 1A01.2.C(4), (6) & (23) FOR USE OF AN EXISTING BUILDING FOR RELIGIOUS WORSHIP, SCHOOL AND CAMP AS A SPIRITUAL RELIGIOUS RETREAT CENTER.

2.) SPECIAL HEARING (IF REQUIRED) -
A. A MODIFIED PARKING PLAN PURSUANT TO SECTION 409.12 OF THE BCZR.
B. FOR SUCH OTHER AND FURTHER RELIEF AS MAY BE DEEMED NECESSARY BY THE ZONING COMMISSIONER.

DRAWN BY:	M.J.G.
CHECKED BY:	N.T.A.
DATE:	08/06/08
SCALE:	1" = 40'

PROJECT:

SPECIAL EXCEPTION PLAN

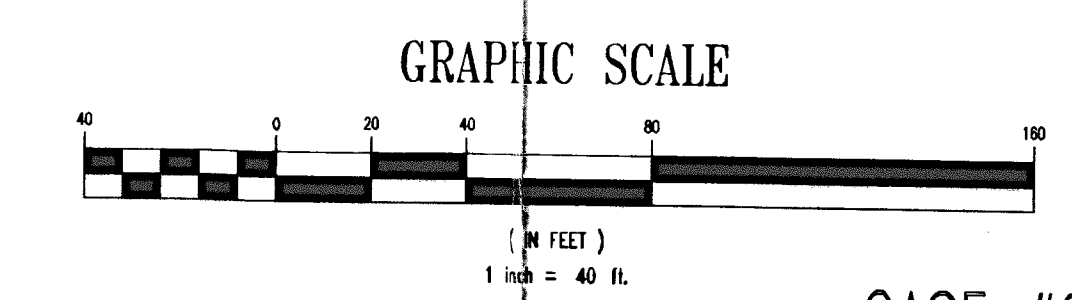
FOR

ROBERT & ASTRA
BRANTLEY

14821 HANOVER PIKE
UPPERCO
BALTIMORE COUNTY, MD

SHEET TITLE:
PLAN TO ACCOMPANY
SPECIAL EXCEPTION
HEARING

SHEET NUMBER:
1
OF 1



CASE #2009-0042-SPHX

Detained 14, Jan 9 @ 10:00 ✓

Order issued
3/26/2010 (20090042)

EXHIBITS

2 of 2

ARTICLES OF INCORPORATION FOR A TAX-EXEMPT NONSTOCK CORPORATION

FIRST: The undersigned Robert L. Brantley

whose address is 14821 Hanover Pike, Upperco, MD 21155

_____, being at least eighteen years of age, do(es)
hereby form a corporation under the laws of the State of Maryland.

SECOND: The name of the corporation is Justice University Foundation, Inc.

THIRD: The purposes for which the corporation is formed are as follows: Fund global efforts, educating
people toward transforming imperfect social systems into structures of justice.

Said corporation is organized exclusively for charitable, religious, educational, and scientific purposes, including, for such purposes, the making of distributions to organizations that qualify as exempt organizations under Section 501(c)(3) of the Internal Revenue Code, or the corresponding section of any future federal tax code.

FOURTH: The street address of the principal office of the corporation in Maryland is 14821 Hanover Pike,
Upperco, MD 21155

FIFTH: The name of the resident agent of the corporation in Maryland is Robert L. Brantley
_____, whose address is 14821 Hanover Pike,
Upperco, MD 21155

SIXTH: The corporation has no authority to issue capital stock.

SEVENTH: The number of directors of the corporation shall be 1 which number may be increased or
decreased pursuant to the bylaws of the corporation. The name(s) of the director(s) who shall act until the first meeting or
until their successors are duly chosen and qualified is/are Robert L. Brantley

EIGHTH: No part of the net earnings of the corporation shall inure to the benefit of, or be distributable to its members, trustees, officers, or other private persons, except that the corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth in Article Third hereof. No substantial part of the activities of the corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the corporation shall not participate in, or intervene in (including the publishing or distribution of statements) any political campaign on behalf of or in opposition to any candidate for public office. Notwithstanding any other provision of these articles, the corporation shall not carry on any other activities not permitted to be carried on (a) by a corporation exempt from federal income tax under Section 501(c)(3) of the Internal Revenue Code, or the corresponding section of any future federal tax code, or (b) by a corporation, contributions to which are deductible under Section 170(c)(2) of the Internal Revenue Code, or the corresponding section of any future federal tax code.

Upon the dissolution of the corporation, assets shall be distributed for one or more exempt purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code, or the corresponding section of any future federal tax code, or shall be

ARTICLES OF INCORPORATION FOR A STOCK CORPORATION

FIRST: The undersigned Robert L. Brantley

whose address is 14821 Hanover Pike, Upperco, MD 21555, being at least eighteen years of age, do(es) hereby form a corporation under the laws of the State of Maryland.

SECOND: The name of the corporation is Justice University, Inc.

THIRD: The purposes for which the corporation is formed are as follows:
Institution of higher learning, educating people toward transforming imperfect social systems into structures of justice.

FOURTH: The street address of the principal office of the corporation in Maryland is
14821 Hanover Pike, Upperco, MD 21155

FIFTH: The name of the resident agent of the corporation in Maryland is
Robert L. Brantley

whose address is 14821 Hanover Pike, Upperco, MD 21155

SIXTH: The corporation has authority to issue 5,000 shares at \$ 0 par value per share.

SEVENTH: The number of directors of the corporation shall be 1 which number may be increased or decreased pursuant to the bylaws of the corporation. The name(s) of the director(s) who shall act until the first meeting or until their successors are duly chosen and qualified is/are Robert L. Brantley

IN WITNESS WHEREOF, I have signed these articles and acknowledge the same to be my act.

I hereby consent to my designation in this document as resident agent for this corporation.

SIGNATURE(S) OF INCORPORATOR(S):

SIGNATURE OF RESIDENT AGENT LISTED IN FIFTH:

Robert L. Brantley

Robert L. Brantley

Filing Party's Name and Return Address:

Robert L. Brantley

14821 Hanover Pike, Upperco, MD 21155

CUST ID: 0002090529
WORK ORDER: 0001533567
DATE: 02-22-2008 09:57 PM
AMT. PAID: \$120.00

ARTICLES OF ORGANIZATION

The undersigned, with the intention of creating a Maryland Limited Liability Company files the following Articles of Organization:

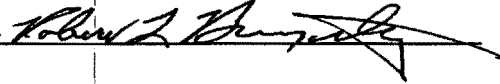
(1) The name of the Limited Liability Company is: _____
THE BRANTLEY GROUP, LLC

(2) The purpose for which the Limited Liability Company is filed is as follows: _____
TO ENGAGE IN ANY LAWFUL ACTIVITIES PERMITTED BY A LIMITED LIABILITY COMPANY ORGANIZED
UNDER THE LAWS OF THE STATE OF MARYLAND

(3) The address of the Limited Liability Company in Maryland is _____
14821 HANOVER PIKE, UPPERCO, MARYLAND, 21155

(4) The resident agent of the Limited Liability Company in Maryland is _____
ROBERT L. BRANTLEY

whose address is _____
297 BELL ROAD, WESTMINSTER, MARYLAND 21158

(5) 

(6) 
Resident Agent
I hereby consent to my designation in this document.

Signature(s) of Authorized Person(s)

Filing party's return address:

(7) _____
14821 HANOVER PIKE, UPPERCO, MD 21155

TRADE NAME APPLICATION

RECEIVED
DEPARTMENT OF
ASSESSMENTS & TAXATION
2007 JUN 20 A 11:54

1) Only one trade name may appear on this line

TRADE NAME:

BRIDGE POINT MINISTRIES

2) STREET ADDRESS(ES) WHERE NAME IS USED:

14821 HANOVER AVE

CITY: UMPERCO STATE: MD ZIP: 21155

P.O. Box address is not acceptable anywhere on this form.

3) FULL LEGAL NAME OF OWNER OF BUSINESS OR INDIVIDUAL USING THE TRADE NAME:

ROBERT L. BRANTLEY

If more than one owner, attach an additional sheet listing each owner with their address. Be sure each owner signs this form.

4) If the owner is an individual or general partnership, does it have a personal property account (an "L" number)? Check one box ☐ YES ☒ NO

If YES, WHAT IS THAT NUMBER? _____

If NO, see instruction 4 under How To Complete Trade Name Application.

5) ADDRESS OF OWNER:

14821 HANOVER AVE

CITY: UMPERCO STATE: MD ZIP: 21155

6) DESCRIPTION OF BUSINESS: CHRISTIAN, BIBLE-BASED,

CHRIST-CENTERED, SPIRIT-LED MINISTRY

I affirm and acknowledge under penalties of perjury that the foregoing is true and correct to the best of my knowledge.

7)

Robert L. Brantley
SIGNATURE OF OWNER

SIGNATURE OF OWNER

SIGNATURE OF OWNER

CUST ID: 0002000322
WORK ORDER: 0001443360
DATE: 07-30-2007 04:25 PM
AMT. PAID: \$25.00

DEPARTMENT OF
ASSESSMENTS AND TAXATION

Charter Division

PARRIS N. GLENDENING
GovernorRONALD W. WINEHOLT
DirectorPAUL B. ANDERSON
Administrator

TRADE NAME APPLICATION

TRADE NAME: THE BRANTLEY GROUP

ADDRESS(ES) WHERE NAME IS USED:

601 N. EUTAW ST.SUITE 101BALTIMORE, MD. 21201

FULL LEGAL NAME OF OWNER OF BUSINESS USING THE TRADE NAME:

ROBERT L. BRANTLEY & ASTRA P. BRANTLEYIf the owner is an individual or general partnership, does it have a personal property account (an "L" number)? YES ☐ NO ☒

If YES, what is that number? L _____

If NO, see instruction 7 on the other side of this form.

ADDRESS OF OWNER:

297 BELL ROADWESTMINSTER, MD.ZIP: 21158DESCRIPTION OF BUSINESS: CHRISTIAN MANAGEMENT &
MENTAL HEALTH SERVICESI AFFIRM AND ACKNOWLEDGE UNDER PENALTIES OF PERJURY THAT THE FOREGOING IS TRUE AND
CORRECT TO THE BEST OF MY KNOWLEDGE.Robert L. Brantley
SIGNATURE OF OWNER

MAY 31 2002

SIGNATURE OF OWNER

Astra P. Brantley
SIGNATURE OF OWNER

SIGNATURE OF OWNER

Revised 5/00

Room 801 - 301 West Preston Street - Baltimore, Maryland 21201
Phone: (410) 767-1350 - Fax: (410) 333-7097 - TTY users call Maryland Relay 1-800-735-2258
Toll Free in MD: 1-888-246-5941 - web site: <http://www.dat.state.md.us>

Miscellaneous Documents (NOT EXHIBITS)

- Final Order of Code Enforcement Hearing Officer dated 8/16/07
- Final Order of Code Enforcement Hearing Officer dated 6/24/08
- Packet of documents marked exhibits A-E
- Code Enforcement Issues Packet provided by Patricia Fallon and Barbara Ambrose
- Request for Tax-Deductible Contributions BridgePoint Ministries
- Findings of Fact and Conclusion of Deputy Zoning Commissioner (Kotroco) in Case Number 00-284-A

Department of Permits and Development Management
111 West Chesapeake Avenue
Towson, Maryland 21204
Baltimore County, Maryland

In the Matter of

Civil Citation No. 07-9333

Robert L. Brantley
Astra Brantley

14821 Hanover Pike

Respondents

FINDINGS OF FACT AND CONCLUSION OF LAW
FINAL ORDER OF THE CODE ENFORCEMENT HEARING OFFICER

This matter came before the Code Enforcement Hearing Officer for the Department of Permits and Development Management on August 15, 2007, for a hearing on a citation for violations under the Baltimore County Zoning Regulations (BCZR) § 102.1, 1B01.1A, 230, 230.3, 230.6, 230.8, 450.4, 432.A, 408B; failure to cease use of property exceeding that of a single family dwelling such as tourist home, medical clinic/office, assisted living facility, boarding house; failure to remove illegal signs on residential property zoned RC 2 known as 14821 Hanover Pike, 21155.

On August 10, 2007, pursuant to §3-6-205, Baltimore County Code, Code Enforcement Officer, issued a code enforcement citation. The citation was legally served on the Respondents.

The citation proposed a civil penalty of \$400.00 (four hundred dollars). A code enforcement hearing date was scheduled for August 15, 2007.

Mr. Brantley, Respondent appeared for the Hearing and testified.

Lavette Street, Code Enforcement Officer presented the case for Baltimore County.

Department of Permits and Development Management
111 West Chesapeake Avenue
Towson, Maryland 21204
Baltimore County, Maryland

In the Matter of

Civil Citation No. 07-9333

Robert L. Brantley
Astra Brantley

14821 Hanover Pike

Respondents

FINDINGS OF FACT AND CONCLUSION OF LAW
FINAL ORDER OF THE CODE ENFORCEMENT HEARING OFFICER

This matter came before the Code Enforcement Hearing Officer for the Department of Permits and Development Management on June 18, 2008, for a hearing on a citation for violations under the Baltimore County Zoning Regulations (BCZR) § 102.1 failure to cease use of property which exceeds that of a single-family dwelling on residential property zoned RC 2 known as 14821 Hanover Pike, 21155.

On May 22, 2008, pursuant to §3-6-205, Baltimore County Code, Code Enforcement Officer, issued a code enforcement citation. The citation was sent to the Respondent by 1st class mail to the last known address listed in the Maryland State Tax Assessment files.

The citation proposed a civil penalty of \$1,000.00 (one thousand dollars).

Mr. Brantley, Respondent appeared for the Hearing and testified.

Lavette Street, Code Enforcement Officer presented the case for Baltimore County.

Testimony and evidence shows the property to be in violation of operating a professional office without benefit of a special exception. Exhibits presented by Code Enforcement and neighbors clearly show something taking place outside the parameters of a home occupation. Even Mr. Brantley's exhibit marked "Respondent Exhibit #1" describes the use; which far exceeds the home occupation regulations. Contrary to Mr. Brantley's item #3 on Respondent's #1 the use of the home as a professional office was not upheld (see Order issued August 16, 2007).



EXHIBIT

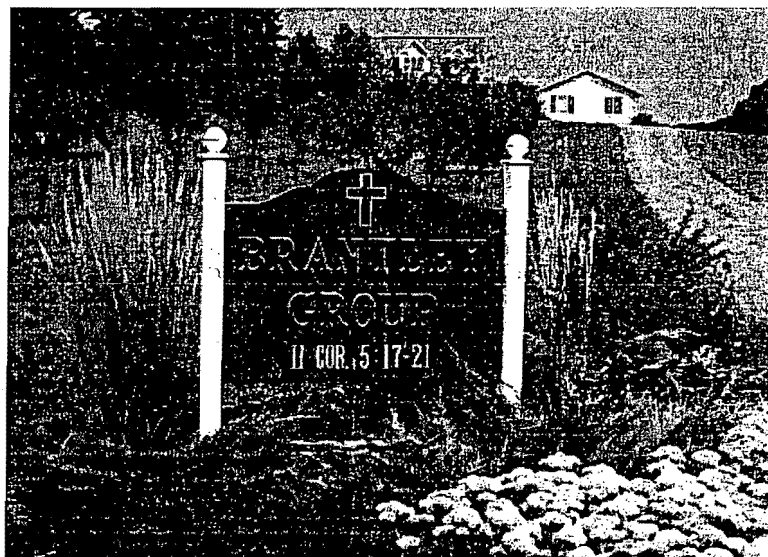
B

tabbles

The Brantley Group

Serving the Body of Christ

[Home](#) [About Us](#) [Photos](#) [Links](#) [Contact Us](#)



ASSOCIATE PERSONNEL

DAMON W. BRANTLEY holds a B.S. degree in Biology Pre-Med from Morehouse College in Atlanta, Georgia; and a Doctor of Medicine degree from the University of Maryland School of Medicine in Baltimore, Maryland. Dr. Brantley is a general surgeon, an Army Major in the United States military, and a much sought after Christian/Biblical speaker on issues of faith, health and healing.

CYNTHIA Y. BRANTLEY, B.A., Computer & Statistical Associate Cynthia Y. Brantley holds a B.A. degree in Mathematics from Spellman College in Atlanta, Georgia. She is a gifted teacher and tutor of serious students of mathematics; and a specialist in the use of computer and Internet technology for clinical and applied social and medical research, and the management of health service delivery.

FRONZIE Q. WILLIAMS, M.S., Education & Training Associate Fronzie Q. Williams holds a B.A. degree in Education from Roosevelt University in Chicago, Illinois; and a M.S. degree in Education from Southern Illinois University. She is an experienced social service administrator, a gifted writing instructor, and a trainer of teachers throughout the Baltimore City public school system. Ms. Williams designs and delivers curriculum and training to enhance instruction in the public school system, and promote student retention and achievement toward State of Maryland standards. She is also accomplished in the art of planning, coordinating, and implementing special events.

[Faith](#) [Services](#) [Associates](#) [Community](#) [Resources](#) [Brochures](#)

© 2003-2005 The Brantley Group. Site designed by WebMissionary

EXHIBIT

C



Relax. Resolve. Renew

HOME

ABOUT NEAR HAVEN

MEET THE STAFF

SERVICES

PROGRAMS

FACILITY

LABYRINTH

CONTACT

LINKS

DOWNLOADS

SITEMAP

INTRODUCING "BRIDGE POINT"

"Where Clinicians and Clergy Connect to Provide Counseling Service to the Body"

Our desire is to be a professional resource to you, a direct care provider to your members, and a consultant to your church leadership in the area of mental health. To review the BRIDGE POINT brochure, Click here or contact me at 410-625-2900 to arrange a private confidential exploratory meeting to discuss how BRIDGE POINT can help you. View 2007 schedule

PASTORS & CLERGY CONNECT with CLINICIANS

Mother's Day Haven Quest: Saturday April 28

Click here or go to our download page to print out a brochure for more information.

Father's Day Haven Quest: Saturday June 2

Click here or go to our download page to print out a brochure for more information.

Experience Near Haven

Just minutes outside of Baltimore, Maryland you will find a place of peace and a center of calm in this busy world Near Haven.

Near Haven's facilities provide a perfect setting for the psychological, spiritual and whole health services we offer our clients. The three acre Near Haven estate features organic gardens and fruit trees, meditative walkways and decorative flowers, all surrounding the spacious, sun drenched, main complex.

Our integrated approach to optimum health brings together cultural, spiritual and therapeutic modalities, creating a wholistic vision and a therapeutic path toward a healthy mind, body and spirit.

People are always being blessed at Near Haven. Our on going services, programs, lectures and Living Well Whole Health classes make Near Haven an oasis on your journey to whole health.

We invite you to take a few minutes to explore the experience of Near Haven

NEAR HAVEN EXECUTIVE MEETING RETREAT & HOST HOME BROCHURE

EXHIBIT

tabbies

D



Robert & Dr. Astra P. Brantley

Welcome to the place where location and technology and personal service meet. Conveniently located on three acres in scenic Anne Arundel County, Maryland and just minutes away from the beautiful Baltimore Inner Harbor, the Executive Meeting and Business Center at Near Haven is a full service, state-of-the-art meeting facility designed with the small executive group in mind. Near Haven is not only an outstanding facility for what's in it, but also for what's around it. Fronted by a three dozen tree fruit orchard, Near Haven grounds host a prayer garden, a meditative walking labyrinth, and an organic vegetable garden in the rear. The property is distinguished by its symphony of decorative flowers and shrubbery that are frequently visited by local birds and exotic butterflies. Take a break from your meeting and enjoy the environmental bounty of Near Haven.

Enjoy the Grounds of Near Haven



For More Information About
MEETINGS & BUSINESS RETREATS Contact:

Robert L. Brantley
410.625.2900
www.brantleygroup.com
Near Haven, 14821 Hanover Pike
Upperco, Maryland 21155

The Executive Meeting & Business Retreat at



Your Destination
for the Business of
Stress Management

Situated in a rural agricultural community, but located on a major arterial roadway connecting Maryland to Pennsylvania, the Center is thirty minutes from downtown Baltimore, and within a two-hour drive to Annapolis, Washington DC, and Harrisburg or Philadelphia, Pennsylvania. The local community features fine restaurants, antique shopping, and pastoral scenery.

THE BRANTLEY GROUP



Hanover Road Association

Code Enforcement Issues For 14821 Hanover Pike

Fallon/Ambrose
8/8/2007



SERVING THE BODY OF CHRIST

Request for Tax-Deductible Contributions

BridgePoint Ministries is a Sponsored Program of the Universal Peacemakers Foundation, where Jesus Christ is upheld as the Universal Peacemaker. As a Maryland-based non-profit organization, the Foundation is recognized as tax-exempt by the Internal Revenue Service.

Please help us continue to reach individuals, couples, families, churches, and organizations across America and around the world with the Gospel of Jesus Christ, and with information, education and assistance for "the ministry of reconciliation" -- resolving personal, family, church, business and social conflicts in a biblically faithful manner.

Your tax-deductible gift will help us:

- Strengthen the planning, organization, operation and promotion of our growing ministry
- Revamp our websites, and make them more interactive and integrated with other media
- Improve and make more available our marriage workshops and peacemaking seminars
- Serve needy, elderly, and military individuals, couples, and families

BRIDGEPOINT MINISTRIES IS A SPONSORED PROGRAM OF THE UNIVERSAL PEACEMAKERS FOUNDATION

**We are a depositor with the ECCU
EVANGELICAL CHRISTIAN CREDIT UNION**

Please Make Contribution Checks Payable To:

THE UNIVERSAL PEACEMAKERS FOUNDATION

14821 Hanover Pike . Upperco, MD 21155 . Phone 410-625-2900 . Fax 410-625-2919 . email brantley@brantleygroup.com

**YOU MAY CALL US WITH YOUR CREDIT CARD INFORMATION TO MAKE A 2007 GIFT
OR YOU MAY EMAIL US SO THAT WE CAN CALL YOU
(MAKE SURE THAT IT IS US CALLING YOU BACK)**

Verified
10/19/09 KXC

10/14/09

Brantley

2009-0

Protestant's Exh.

3. Sign In Sheet of Community

Sign-In Sheet

Case Name: BRANTLY et ux
Case No.: 2009-0042-SPHX
Date: 10/14/09

The Office of People's Counsel was created by the County Charter to participate in zoning matters on behalf of the public interest. While it does not actually represent community groups or protestants, it will assist in the presentation of their concerns, whether they have their own attorney or not. If you wish to be assisted by People's Counsel, please sign below.

[illegible]

Verified
10/19/09 KAC
10/14/09

Brantley

09-042-SPHX

Petitioner's Exhibits

1. Memorandum to Board

* File moved into evidence.

MEMORANDUM

10/15/2009

TO: LAWRENCE M. STAHL
Panel Chair
HOWARD COUNTY BOARD OF APPEALS

FROM: ROBERT L. & ASTRA P. BRANTLEY *RZBAPB*
Petitions for Special hearing and Special Exceptions
14821 Hanover Pike
Case No.: 09-042

RE: OPENING STATEMENT

Thank you, Mr. Stahl, for this opportunity to make/submit this opening statement. Without the benefit of legal counsel, we appear before you with a determination that the truth be told regarding our case; and with full confidence that the rule of law and the proceedings of this hearing will provide us the protections that we seek under the law, which was and is our sole motivation for our requests and our appeal.

We desire only to be protected from lawless and dangerous neighbors who would lie to and attempt to manipulate Baltimore County authorities in their campaign to deny us the quiet enjoyment and legal use of our home. I am an ordained Christian clergyman, a Clergy Coach, a Pastoral Counselor, and a family financial and estate planner. My wife is a State Licensed Clinical Psychologist. We both are "professional persons" who work from our home. We have no employees, and we use less than 25% of the total floor area of our home for business purposes.

According to an official County document entitled: "RESOURCE CONSERVATION ZONES", SECTION 1A01, R.C.2 (Agricultural Zone), pages 1A-5 and 1A-6, dated 04-15-2005 (see copy attached), section 1A01.2 entitled Use Regulations, point B, "Uses permitted as of right" include, but are not limited to: "offices or studios of physicians, dentists, lawyers, architects, engineers, artists, musicians or other professional persons, provided that any such office or studio is established within the same building as that serving as the professional person's primary residence at the time of application; does not occupy more than 25% of the total floor area of that residence; and does not involve the employment of more than one nonresident employee. [Bill Nos. 78-1979; 105-1982; 65-1999]

Through fraudulent claims and complaints, our neighbors to the north (Ms. Patti Fallon and Ms. Barbara Ambrose) have forced these proceedings in pursuit of their assaultive pledge to come after me and get me because they wrongfully imagine that I abused their cats; when in fact it is their relentless abuse of County law (limiting residents to 3 pets that must be collared and leashed when outside the home) that results in a proliferation of feral cats that sometimes abuse domesticated pets. Please see attachments that document their dangerous lawlessness, from which we seek legal protection under the law.

Pet 1

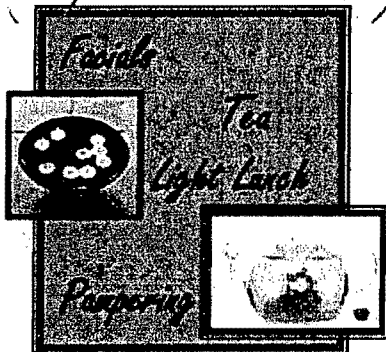
Brantley

C-2
Zoning Issues 6/16/08

Near Haven – Internet advertising for event not allowed under ruling

Spa & Sparkle '08

"Refresh: A Relaxation Getaway @ Near Haven"



Saturday, June 28, 2008
11 a.m. – 3 p.m.

Near Haven
14821 Hanover Pike
Upperco, MD 21155
www.experiencenearhaven.com

Ladies, you deserve this!

Join us for an afternoon of relaxation and pampering at the lovely Near Haven Retreat in Upperco Maryland (near Owings Mills). Take time out in the prayer garden, the organic garden or walk your cares away in the peace labyrinth.

Tickets are \$30 before May 15th, \$39 after.

Space is limited and tickets will not be sold at the door.

Mail your check to:
Sistahs' Business Network
P.O. Box 44156
Fort Washington, MD 20749

Visit www.sistahsbusinessnetwork.com or www.spaandsparkle.com for more details.

Advertising opportunities are available.



THE UNIVERSAL PEACEMAKERS FOUNDATION is the sponsor and host of **BridgePoint Ministries @ NEAR HAVEN**, and other ministries that pursue the mission and goals of the Foundation.

Our mission is to bring glory to God through the biblical pursuit of His Kingdom Agenda to reconcile man unto Himself forever.

Our ministry is the ministry of reconciliation according to II Corinthians 5:17-21; and we serve God's people as His Ambassadors for **Jesus Christ -- The Universal Peacemaker.**

OUR CAMPAIGN GOAL

ONE MILLION DOLLARS PER YEAR FOR FIVE YEARS FOR FOUNDATION OPERATIONS AND TO BUILD THE ENDOWMENT

GLOBAL SERVICES PROVIDED THROUGH THE UNIVERSAL PEACEMAKERS FOUNDATION include, but are not limited to:

- Marriage as Ministry Workshops
- Biblical Financial & Estate Planning
- Biblical Conflict Resolution Consulting
- Biblical Stewardship Living Publications
- Christian-biblical Counseling, Psychotherapy, Training & Supervision
- Clergy Coaching

LOAVES & FISHES ENDOWMENT

FINANCIAL PARTNERSHIPS

THE UNIVERSAL PEACEMAKERS FOUNDATION is in need of a **\$3,000,000** financial endowment to provide fiscal stability to the organization, its mission, and ongoing work, through the ministries that it sponsors and hosts.

We need **FINANCIAL PARTNERS** to join us in this important ministry which sponsors and hosts other ministries worldwide. You may partner with us in a variety of manners:

- Cash Donations
- Planned Monthly Contributions
- Annual Major Gifts
- Corporate Grants
- Matching Grants
- Church Missionary Budgets
- Church Benevolent Budgets
- Insurance Policies
- Trusts, Capital Gains & Estate Plans
- Strategic WIN-WIN Collaborations
- Sound Ministry Investing (SMI)

UNIVERSAL PEACEMAKERS FOUNDATION OPERATIONAL NEEDS		
BUDGET ITEM	ANNUAL AMOUNT NEEDED	TIMETABLE OF NEED
Office Space	\$75,000	IMMEDIATE
Office Equipment	-0-	DONATED
Office Furnishings	-0-	DONATED
Office Supplies	\$25,000	IMMEDIATE
Complex High-Speed Internet Services	\$25,000	IMMEDIATE
Leadership & Management	\$150,000	IMMEDIATE
Support Services & Personnel	\$75,000	IMMEDIATE

FISCAL ACCOUNTABILITY HOSTS

THE UNIVERSAL PEACEMAKERS FOUNDATION IS A MARYLAND NON-PROFIT CORPORATION RECOGNIZED BY THE IRS AS TAX EXEMPT UNDER THE 501(C)3 TAX CODE. DONATIONS TO THE FOUNDATION ARE TAX DEDUCTIBLE.

WE MAINTAIN BANK ACCOUNTS AT THE EVANGELICAL CHRISTIAN CREDIT UNION.

FOR MORE INFORMATION CALL US AT NEAR HAVEN, 410-625-2900, OR EMAIL US AT brantley@brantleygroup.com. Please visit us at www.ExperienceNearHaven.com.





NEAR HAVEN

As host for THE UNIVERSAL PEACEMAKERS FOUNDATION, Near Haven provide a perfect setting for the psychological, spiritual and whole health services we offer our clients. Fronted by a fruit orchard, the three-acre Near Haven estate features a prayer garden, a meditative walking labyrinth, and an organic vegetable garden in the rear. The property is distinguished by its symphony of decorative flowers and shrubbery that are frequently visited by local birds and exotic butterflies.

In the spacious, sun-drenched main complex, you are embraced by panoramic views of the grounds, and warmed in winter by a magnificent river stone fireplace and other interior appointments that must be experienced personally, such as the state-of-the-art acoustic therapy room which awaits to envelop you with soothing therapeutic music, ushering you into a state of deep relaxation. Our integrated approach to optimum health brings together cultural, spiritual and therapeutic modalities, creating a holistic vision and a therapeutic path toward a healthy mind, body and spirit.

DIRECTIONS:

From Baltimore - take 695 to 795 to Route 30 North, which is Hanover Pike

From DC - take 95N to 695 to 795 to Route 30 North, which is Hanover Pike

From Frederick or Carroll County - take 140 to Emory Road (91 E) to Route 30 S

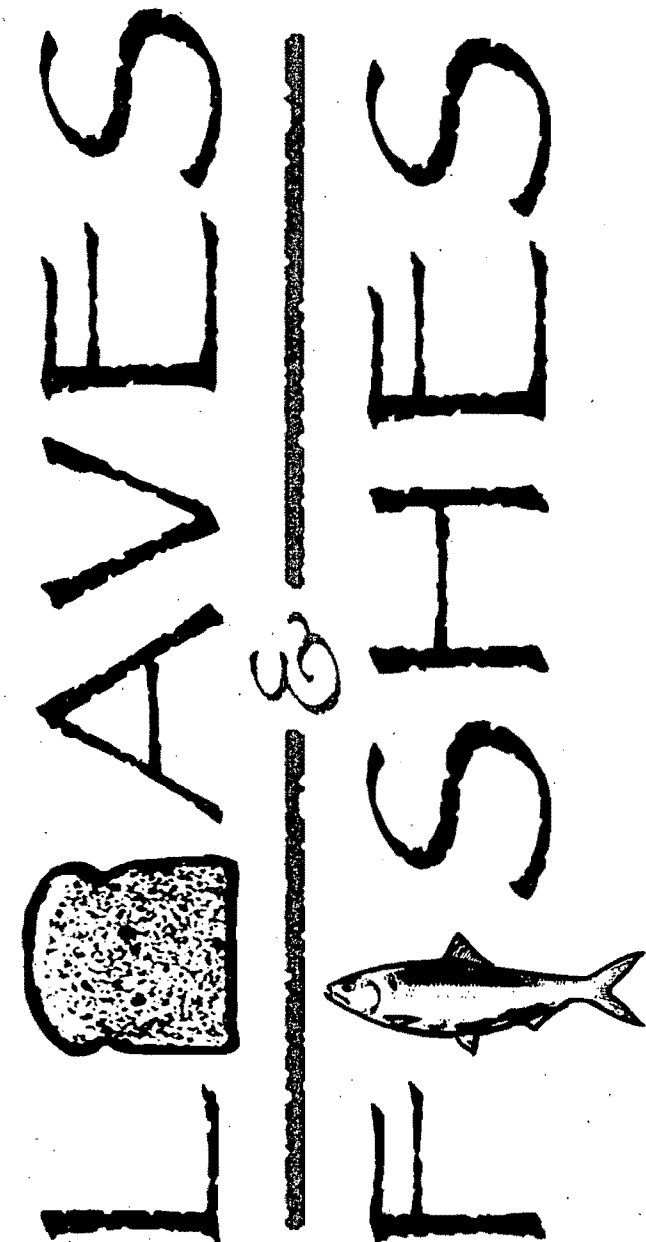
From Pennsylvania - take Route 30 South to 14821 Hanover Pike

4-7

UNIVERSAL PEACEMAKERS FOUNDATION
FIVE-YEAR ENDOWMENT CAMPAIGN
14821 HANOVER PIKE
UPPERCO, MD 21155

LOAVES & FISHES

UNIVERSAL PEACEMAKERS FOUNDATION
FIVE-YEAR ENDOWMENT CAMPAIGN





07/23/07

07-9333 LS

Reop Esh

BRIDGE POINT MINISTRIES

@



ABOUT THIS MINISTRY

www.ExperienceNearHaven.com

Universal Peacemakers Foundation



A Commitment to Biblical Conflict Resolution

As people reconciled to God by the death and resurrection of Jesus Christ, we believe that we are called to respond to conflict in a way that is remarkably different from the way the world deals with conflict. We also believe that conflict provides opportunities to glorify God, serve other people, and grow to be like Christ. Therefore, in response to God's love, and in reliance on His grace, we commit ourselves to responding to conflict according to the following principles: Glorify God, Get the Log Out of Your Own Eye, Gently Restore, Go and Be Reconciled.

Peacemaker Ministries in Billings, Montana

Since its inception in 1994, The Universal Peacemakers Foundation, a Maryland nonprofit, non-stock corporation, has had as its purpose charitable, educational, training, and counseling services in the area of crisis & conflict resolution, in accordance with section 501(c)(3) of the Internal Revenue Code; and the undertaking of other projects, programs, and activities consistent with tax exempt IRS Code.

LEARNING TO RESOLVE CONFLICTS.....

- . understanding how conflict begins, and how it is prolonged or aggravated
- . discerning your contribution to conflict, to confess your wrongs, & how to repair damage you have done

- . deciding when and how to confront others, and help them take responsibility for their role in conflict
- . identifying and overcoming roadblocks to forgiveness and reconciliation
- . negotiating just and reasonable agreements that will strengthen your relationships
- . getting help from other mature Christians when you cannot resolve a conflict in private
- . deciding how to respond to someone who refuses to deal with conflict in a reasonable manner

.....IN AN EFFECTIVE AND BIBLICALLY FAITHFUL MANNER

Sistahs' Business Network

07-9333

Home

About Us

Contact Us

Membership

Member Directory

Calendar

Newsletters

Bulletin Board

2008 Conference & Retreat

Grow! Advertise With SBN

Inspiration and Information For The African American Christian Bu



Encouraging

"Beloved, I wish above things that you would"

Let's connect. Join the Members Only SBN List Serve where we share. The List Serve can also be used to solicit help, support and advice from

If you are a member and haven't received your invitation to the List Serve, please be sure to send one to you.

Inspiring, Informing and Helping You Grow!

*Here is a list of our upcoming 2008 Meetings and Events.
More details will be coming soon.*

May Monthly Meeting

Tuesday, May 27, 2008 6pm to 8pm

Linden Hall Ellicott City, MD

Meeting Topic: Marketing Your Small Business

Special Price: \$10.00!

Our guest speakers will be Ms. Sheila Dixon of

S&E Marketing Concepts and Mr. Che Brown of Partners in Learning!

June Monthly Meeting

Tuesday, June 24, 2008 6pm to 8pm

Linden Hall Ellicott City, MD

Meeting Topic: "Self Love: You Are Your Most Important Asset"

Need a contact in the hospitality industry or just need to learn how to take better care of yourself? Then come out to meet our special guest speakers Ms. Janice Orr of Phoenix Rising Bed and Breakfast and Ms. Ray Brown of the Maryland House of Ruth.

Special "We Love You Price": \$10.00!

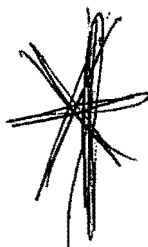
Special Event:

Rescheduled Until Fall, 2008

"Refresh: A Relaxation GetAway at Near Haven"

A Spa and Day of Relaxation and Inspiration

Let us pamper and spoil you!! There will be seated massages, facials, spa goodies, tea and a light lunch. Come walk your cares away in the peace labyrinth or visit the prayer garden. Cost \$39.00. Tickets will not be sold at the door. Advertising opportunities



ASSOCIATION OFFICERS

President: Glenn Elseroad

Vice President: George Neubeck

Secretary: Rob Holtz

Treasurer: Carol Isaac

BOARD OF DIRECTORS

Sandy Brown Stan Dabkowski

Dorothy Griffin George Harman

Bob Slaterbeck Kelly Palmiotto

Libby Southall Mike Snyder

Paul Joyce

FOR MORE INFORMATION OR TO CONTACT OFFICERS AND THE BOARD:

website: hanoverroad.org

President: Glenn Elseroad, 410-429-3990

e-mail: sgelseroad@comcast.net

Vice President: George Neubeck, 410-833-0893

Secretary: Rob Holtz e-mail: rholtz@aol.com

MEETING SCHEDULE

The association holds public meetings on the second
Wednesday of every even-numbered month at 7:30 p.m.
at Mt. Gilead United Methodist Church, Woodensburg.

MEMBERSHIP

Open to anyone interested in preserving the quality of life in
the Hanover Road area and promoting cooperation between
the residential, business and agricultural communities.

Annual Dues: \$20.00

**Hanover Road Association
P. O. Box 70
Boring, MD 21020**

RECYCLE

THIS NEWSLETTER

Pass it on to a
neighbor who is
not on our
mailing list.

Thanks!

HanoverRoad.org

Code Enforcement Issues

We have invited a representative from the Baltimore
County Code Enforcement Unit to attend our August
meeting.

We will attempt to gain a better understanding of the
usages of a property known as "Near Haven"
operated by Bridge Point Ministries. Several
neighbors have expressed concerns and feel the usage
is exceeding the allowance of the RC-2 zoning.

Baltimore County Code Enforcement

Code Enforcement Issues For 14821 Hanover Pike

Reference: Civil Citation 07-9333

Decision rendered August 2007

Ambrose
6/16/08

BRIDGE

NEWSLETTER

CONFIDENTIALITY

Confidentiality is almost impossible to maintain with pastoral in-church counseling.

DUAL RELATIONSHIP

Dual relationships are impossible to avoid with member-led in-church counseling

CODES OF ETHICS

Counseling codes of ethics are not taught and maintained with in-church counseling

SUSPICION

Church members become suspicious of and distrustful toward in-church counseling

INTRODUCING "BRIDGE POINT"

"Where Clinicians and Clergy Connect to Provide Counseling Service to the Body"

Pastor,

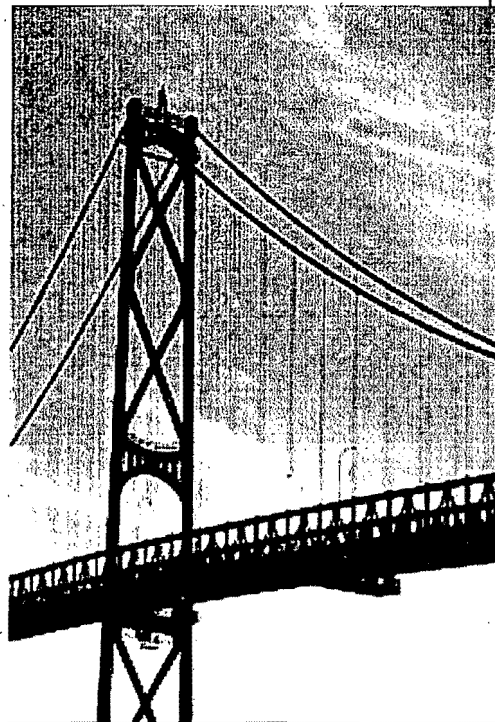
Under the management of THE BRANTLEY GROUP @ NEAR HAVEN, this program is designed to help you provide Christian-biblical counseling to your church members and families that is Christ-centered, Bible-based, and Spirit-led.

Our desire is to be a professional resource to you, a direct care provider to your members, and a consultant to your church leadership in the area of mental health.

Please review the enclosed **BRIDGE POINT** brochure, and expect a follow-up communication from me to arrange a private confidential exploratory meeting to discuss how **BRIDGE POINT** can help you.

In His Service,

Minister Robert L. Brantley, Clergy Coach



Resp.

CORN	CORN	CORN
ROMA BEEFSTEAK TOMATOES CELEBRITY	BIG BOY BEEFSTEAK TOMATOES	GREEN PEAS SWEET POTATOES(July)
ROMA BEEFSTEAK TOMATOES BIG BOY	P. CHARD P E E A A S S	BUSH CUCUMBERS STRAWBERRIES BUSH CUCUMBERS
BASIL PARSLEY BASIL	ROSE BUSH	BEETS CILANTRO SWEET POTATOES (July)
BASIL OREGANO SAGE	BASIL THYME ROSEMARY	SWEET PEPPERS EGGPLANT
SWEET GREEN/ PURPLE CELERY SWEET RED PEPPERS JALEPEN0 PEPPERS FRENCH TARRAGON	SAGE	CUCUMBERS

East
↑
N ⇌ S
↓
West



FOUR DIRECTIONAL GARDEN LABYRINTH

Date: 2007 Staff: Astra Brantley

Bridge Over Troubled Waters

Billy Graham once said that "The situation in the organized and institutional church today is in danger. We may be losing the battle for the minds of men and women through materialism and secularism. Unless the trend is radically reversed, the institutional church may well go into decline. One of the problems is that the average person has little concept of what the church really is."

True church growth is the result of the church's being a healthy Body of Christ living in obedience to Him. When congregations are healthy, they grow the way God intends.

Bridge Point can help Pastors and churches "bridge the gap" between church growth and church health. The Bridge Point biblically based strategic approach frees the church for growth to honor God, to serve people, and to become the true Bride of Christ.

BRIDGE POINT "One of a Kind"

Distinct & Unique Qualifications:

- Northwestern University School of Management trained M.B.A.
- Licensed Clinical Psychologist with public and private experience
- Ordained Minister of the Gospel of Jesus Christ
- Certified Christian Conciliators for more than 15 years
- Combined more than 30 years of service to the Body of Christ
- Published in respected Christian professional journals and magazines
- Founders of Stewardship Living Publications
- Developers of premiere healing interventions such as:
 - 12 Week Stress Self Defense Prog.
 - Workshop, Support Group, Book for Targets of Workplace Bullying in Maryland (www.MDStopBully.com)
- Creators of the Whole Health Biblical Stewardship Living Model @ Near Haven

Brantley Group @ Near Haven

14821 Hanover Pike

Upperco, Maryland 21155

Phone: 410.625.2900

Fax: 410.625.2919

Email:

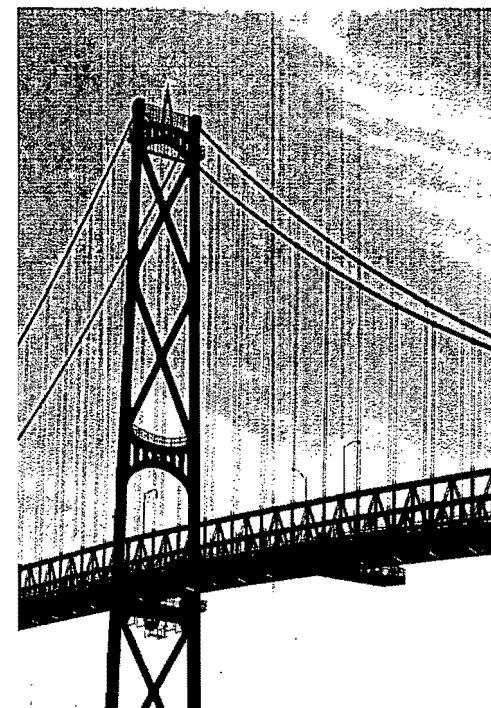
brantley@brantleygroup.com

www.ExperienceNearHaven.com



BRIDGE POINT

Where Clinicians and Clergy Connect



**Counseling Services
to the Body of Christ**

Cash

BRIDGE POINT MINISTRIES

@



ABOUT THIS MINISTRY

www.ExperienceNearHaven.com



Welcome to the place where location and therapy and personal service meet. Just minutes outside of Baltimore Maryland, you will find a place of peace and a center of calm in this busy world - **Near Haven**. Near Haven is your pastoral destination for the purpose of relaxing, resolving and renewing.

Near Haven's facilities provide a perfect setting for the psychological, spiritual and whole health services we offer our clients. Fronted by a fruit orchard, the three acre Near Haven estate features a prayer garden, a meditative walking labyrinth, and an organic vegetable garden in the rear. The property is distinguished by its symphony of decorative flowers and shrubbery that are frequently visited by local birds and exotic butterflies.

[Home](#) [About Us](#) [Services](#) [Seminars & Workshops](#) [Management](#) [Resources](#) [Contact Us](#) [Links](#)

©2005-2007 Experience Near Haven

The Brantley Group

Serving the Body of Christ



People are powerful helpers of other people as they develop Godly character, spiritual discernment, and Christ-like compassion, whether through training or life experiences. We were built for "connection", with God and with others; and the root of our personal and community problems is "disconnection." Since we are "disconnected souls", healing will take place only through "connection in community" - a "faith based community." The work of healing belongs to the community of faith, with professional counselors offering help in developing "true connections." Because we believe that our personal and community problems have more to do with how we relate to others than with a damaged sense of self that needs therapeutic repair, we focus our philosophy of care toward the healing potential of true community.

[Home](#) [About Us](#) [Services](#) [Seminars & Workshops](#) [Management](#) [Resources](#) [Contact Us](#) [Links](#)

© 2003-2007 The Brantley Group.

Case No.: 2009-0042 - SPHX

14821 Hanover Pike

Exhibit Sheet

Petitioner/Developer

Protestant

No. 1	Aerial View of Property	SPA ; SPARKLE internet advertisement
No. 2	SITE PLAN	EXECUTIVE Meeting + BUSINESS RETREAT @ NEAR HAVEN
No. 3	Matthew T. Allen, P.E. Curriculum Vitae	BARBARA AMBROS [Power Point Presentation]
No. 4		PLAT Discrepancies
No. 5		WEB SITE Advertisements
No. 6		Listed Brantley Group Alcohol + Drug Treatment
No. 7		Retreat Center Hotel ; Guest House on BHB
No. 8		Association of INKEEPERS Page 2 - Retreat ; Host Home
No. 9		Advertise - Massage Therapy
No. 10		Hotel Advertisement with FEATURES BEING OFFERED
No. 11		Advertisement - massage acupuncture - fitness trainer
No. 12		JUSTICE UNIVERSITY - addressed at 14821 Hanover Pike

Case No.: 2009 - 0042 - SPH

Exhibit Sheet - Continued

Petitioner/Developer

Protestant

No. 13		Brochure - is Bridge Point a "Church" or a "Business"
No. 14		LOAVES & FISHES Religious - WITH 1,000,000 operating Budget
No. 15		METHOD OF PAYMENTS Mental-Health Services - VALUE CARD
No. 16		BRIDGE POINT Brochure Summary of Activities
No. 17		IDENTIFICATION ONLY TRANSCRIPT OF 9/24/08 Hearing
No. 18		
No. 19		
No. 20		
No. 21		
No. 22		
No. 23		
No. 24		

Spa & Sparkle

301.807.5445 | 410.977.0917

add some SPARKLE to your SPA

Now offering an exquisite line of teas and accessories.
Click on the 'Tea Time' link for details.

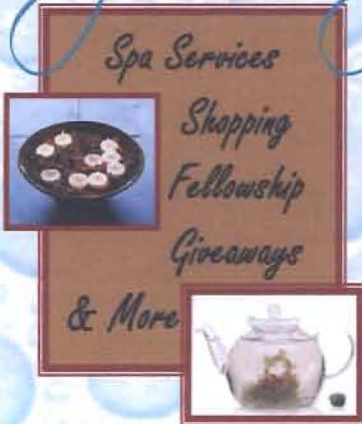


Home
R.S.V.P. Now
Invite a Friend
Download Invitation
Tea Time

SAY SO! presents

Spa & Sparkle '08

~ for women in ministry ~



Saturday, May 24, 2008
10 a.m. – 2 p.m.

@Near Haven
14821 Hanover Pike
Upperco, MD 21155
www.experiencenearhaven.com

Registration Fee:

By May 1 st	After May 1 st
\$20	\$30

Includes lunch and \$10 worth of Spa & Sparkle bucks to use toward spa services or purchases. Group Discounts Available.
No refunds, however, substitutions are allowed.

Space is Limited
Early Registration
is strongly encouraged

Registration must be done online @

www.spaandsparkle.com

Questions? Call 301.807.5445

*Great Mother's Day gift
for that special
woman in ministry in your life!*



PROTESTANT' S

EXHIBIT NO. 1



Your Hosts

Robert & Dr. Astra P. Brantley

Welcome to the place where location and technology and personal service meet. Conveniently located on three acres in scenic Baltimore County, Maryland and just minutes away from the beautiful Baltimore Inner Harbor, the Executive Meeting and Business Center at Near Haven is a full service, state-of-the-art meeting facility designed with the small executive group in mind. Near Haven is not only an outstanding facility for what's in it, but also for what's around it. Fronted by a three dozen tree fruit orchard, Near Haven grounds host a prayer garden, a meditative walking labyrinth, and an organic vegetable garden in the rear. The property is distinguished by its symphony of decorative flowers and shrubbery that are frequently visited by local birds and exotic butterflies. Take a break from your meeting and enjoy the environmental bounty of Near Haven.



Situated in a rural agricultural community, but located on a major arterial roadway connecting Maryland to Pennsylvania, the Center is thirty minutes from downtown Baltimore, and within a two-hour drive to Annapolis, Washington DC, and Harrisburg or Philadelphia, Pennsylvania. The local community features fine restaurants, antique shopping, and pastoral scenery.

THE BRANTLEY GROUP

Enjoy the Grounds of Near Haven



For More Information About
MEETINGS & BUSINESS RETREATS Contact:

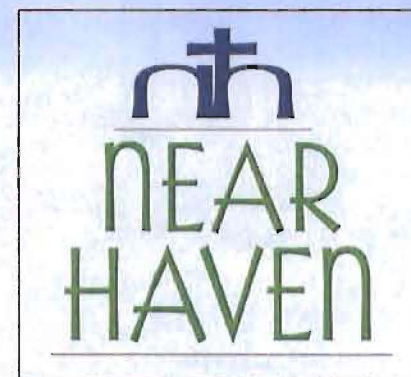
Robert L. Brantley
410.625.2900
www.brantleygroup.com
Near Haven, 14821 Hanover Pike
Upperco, Maryland 21155



PROTESTANT' S

EXHIBIT NO. 2

The Executive Meeting & Business Retreat at



Your Destination
for the Business of
Stress Management

Relax. Resolve. Renew.



Your Destination for the Business of Stress Management

BUSINESS TECHNOLOGY

Possessing an impressive Board Room, the center offers an individual total presentation control, and is equipped with document duplication and binding, multi-level lighting, overhead projector, laptop projector, video tele-conferencing, rooms for breakout sessions, comfortable sitting areas, and even a striking stone fireplace flanked by plush executive leather chairs, making the center a high-tech meeting facility catering to most any need.



Relax.
Resolve.
Renew.

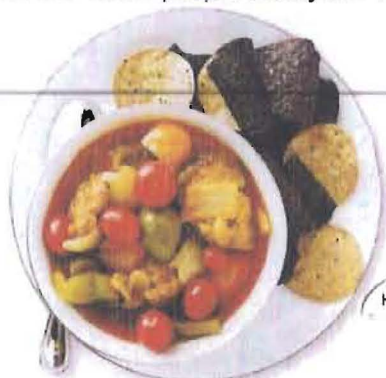


THE Meeting & Business RETREAT



FOOD & BEVERAGE SERVICE

Located near meeting rooms are superbly stocked refreshment kiosks that house refreshments including gourmet coffee, hot cider, hot chocolate, and an impressive assortment of herbal teas, featuring a special blend prepared exclusively for Near Haven – the Haven Quest Blend, which is available as a take-home gift. Professionally catered meals are available, along with fresh fruit from the orchard, and fresh vegetables from the organic garden, which are also available in on-site Haven Quest delicacies such as "Curry Garden Salmon" salad and "Lemon Pepper Chicken" stew prepared by our resident chef.



OVERNIGHT ACCOMODATIONS

A unique feature of Near Haven is its ability to provide on-site therapeutic sleeping facilities for meeting speakers. We have two richly appointed "bed & breakfast type" private bedrooms in our main facility, as well as a separate exclusive "retreat type" bedroom suite featuring a comfortable sitting room, in-room massage table (with services), and private kitchen and laundry facilities, with a handicap accessible/equipped private bathroom. Near Haven also boasts a gym quality treadmill and a back massage chair (with services); and available private intimate classes/experiences in yoga, relaxation, stress reduction, meditation, acupuncture, executive coaching, and clinical psychotherapy.

The Executive Meeting and Business Retreat at Near Haven combines the best in technology, executive-level meeting services, a secluded environment, and overnight therapeutic care.



Relax.
Resolve.
Renew.



*Objection to Special Exception Request
for 14821 Hanover Pike*

Baltimore County Code Enforcement
Reference: 2009-0042-SPHX

Ambrose/Fallon
2/25/09

PROTESTANT'S

EXHIBIT NO.

3

①



Welcome to the place where location and therapy and personal service meet. Just minutes outside of Baltimore Maryland, you will find a place of peace and a center of calm in this busy world - **Near Haven**. Near Haven is your pastoral destination for the purpose of relaxing, resolving and renewing.

Near Haven's facilities provide a perfect setting for the psychological, spiritual and whole health services we offer our clients. Fronted by a fruit orchard, the three acre Near Haven estate features a prayer garden, a meditative walking labyrinth, and an organic vegetable garden in the rear. The property is distinguished by its symphony of decorative flowers and shrubbery that are frequently visited by local birds and exotic butterflies.

Announcing a new VIRTUAL CLERGY CHURCH <http://www.saysomagazine.com/>
Read the interview with Minister Robert Brantley in Say So Magazine

BridgePoint Ministries is a Sponsored Program of the Universal Peacemakers Foundation
If you would like to make a Tax-Deductible Contribution to the Bridge Point Ministries
Please click here for more information on how you can contribute.

Near Haven is host for THE UNIVERSAL PEACEMAKERS FOUNDATION, read more.....

[Home](#) [About Us](#) [Services](#) [Seminars & Workshops](#) [Management](#) [Resources](#) [Contact Us](#) [Links](#)

Visit our E-Store to purchase Books, Cds and more

©2005-2007 Experience Near Haven

PROTESTANTS
EXHIBIT # 5

PROTESTANT'S

EXHIBIT NO. 5



SERVICES

CHRISTIAN MANAGEMENT SERVICES

- Consultation Toward Debt Free Living
- Insurance, Real Estate, Investment Counseling
- Personal Financial & Estate Planning
- Strategic Business Planning
- Organizational Development
- Church/Ministry Management Training & Consultation
- Endowment Planning/Development
- Family Foundation Planning/Development
- Grants Proposal Development
- Conflict Resolution Through Christian Conciliation
- Clergy Coaching

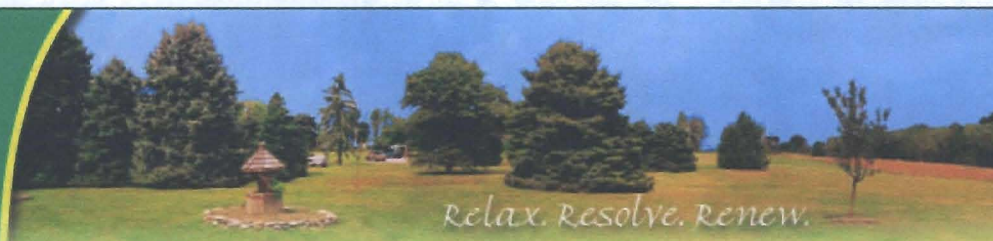
CHRISTIAN MENTAL HEALTH SERVICES

- Individual/Couples/Family Counseling & Psychotherapy
- Psychological Assessments
- Clinical Supervision for Students & Practitioners
- Comprehensive Clergy Services
 - Confidential Personal Counseling
 - Case Consultation/Supervision
 - Clinical Case Referral
- Comprehensive Corporate Services
- Clinical & Applied Research
- Professional Training

WHOLE HEALTH LIVING WELL COUNSELING

- Debt Free Prosperous Living
- Multigenerational Financial & Estate Planning
- Organic Gardening for Relaxation
- Acoustic Relaxation & Meditation
- Stress Self Defense Training
- Labyrinth Meditative Walking on Site
 - Organic Vegetable Garden "Four Directions" Labyrinth
 - Organic Fruit Orchard "Meandering" Labyrinth
 - Prayer Garden "Infinity" Labyrinth
 - Seven Circuit "Classical" Labyrinth

[Home](#)
[About Us](#)
[Services](#)
[Seminars & Workshops](#)
[Management](#)
[Resources](#)
[Contact Us](#)
[Links](#)



SEMINARS & WORKSHOPS

SEMINARS & WORKSHOPS

1. Men's Support Groups
2. Women's Support Groups
3. Marriage Training for Couples
4. Biblical Stewardship Living Training
5. Whole Health Living Well Training
6. Dealing With Supervisor Bullies in the Workplace Workshops & Support Group
7. Clinical Workplace Bullies Workshop for Health Care Providers
8. Other Clinical Trainings:
 1. Clinical Supervision
 2. Supervision & Psychological Training
 3. Strategic Principle-Centered Clinical Supervision
 4. The Joy of Competency-Based Supervision
 5. Counseling Supervision Stewardship/Accountability
 6. A Model of Spiritual Growth Based on the TCM & its Implications for Biblical Counseling Supervision
 7. Strategies for Designing Preventive Solutions for the Supervisory Hazard Zone
 8. Let the Master Beware: A Transtheoretical Model of Clinical Supervision to Help Prevent Ethical Blunders
 9. Toward Optimal Mental Health through Resolving Anger and Restoring Hope: A Comparative Analysis Toward the Integration of the Enright & Fitzgibbons Process Model of Forgiveness and a Faith-Based Model of Forgiveness and Reconciliation
 10. Treatment of Survivors of Sexual Abuse
 11. Personal Mastery Based on the Work of Senge
 12. Working in the Context of Severe Human System Dysfunction
 13. Empowerment: Kick the Powerlessness Habit
 14. Sexual Harassment
 15. Careers of Women & Multiple Roles of Women
 16. Stress & Anxiety Management
 17. Depression in Women
 18. Non-Diet Weight Control
 19. Job Change & Challenge in Your Future
 20. The Dysfunctional Family
 21. Vineland Adaptive Behavior Scales
 22. Setting Your Own Limits
 23. Choosing Empowerment vs the Roles/Rules in Addiction-Driven Families
 24. Effective Biblical Counseling Ministry
 25. The Blessing of Grief
 26. Stress is Inevitable, but Burn-Out is Optional
 27. Help! I May be in Over my Head (Referral/Case Management))
 28. Peacemaker Marriages
 29. Through Adversity to Testimony – Stewardship Living Model in Counseling

CLASSES & EVENTS

- Debt Free Prosperous Living
- Managing Your Lifestyle
- Money Mapping
- Sound Mind Investing
- Peacemaking
- Forgiveness
- Mother's Day Haven Quest
- Father's Day Haven Quest
- Holiday Haven Quest for Women
- Holiday Haven Quest for Men

[Home](#)
[About Us](#)
[Services](#)
[Seminars & Workshops](#)
[Management](#)
[Resources](#)
[Contact Us](#)
[Links](#)



AddictionSearch.com
the latest addiction information on the internet
800-559-9503 Rehab Helpline

HOME | ARTICLES | FORUM | BLOG | ADD TO FAVORITES | EMAIL THIS LINK | CONTACT US

☒ Treatment Centers ☐ Addiction Information

Addictions >
Statistics >
Populations >
Treatment >
Articles >
Facilities >
Prevention >
Social Issues >
Organizations >
War on Drugs >



Free 24 Hour Addiction Helpline
1-800-559-9503

Addiction Search - Brantley Group

If you have a resource that is not listed, you can [Submit a Listing](#).

Problem With Drugs or Alcohol?
We Can Help. We Have Counselors on Call 24 Hours a Day to Assist. Call Now For Immediate Assistance.

800-559-9503

LIVE SUPPORT
ONLINE!
CLICK FOR HELP!

Drug Rehabilitation

Drug Rehabilitation is an umbrella term for a variety of processes by which a person addicted to a drug stops using that drug. These processes can vary from cold turkey to the use of substitute drugs which do not have the same action upon the state of consciousness as the original drug to which the person was addicted.

Alcoholism and Drug Addiction Intervention

A drug and alcoholism intervention is an attempt by family members and friends to help a chemically dependent person get help for his or her addiction.

Below is the listing for Brantley Group, a business in the Counseling Services category.

Alcohol Drug Treatment

Highest Cure Rate in the Country Private, Inpatient Rehab Facility

Address: 14821 Hanover Pike
City: Upperco
State: MD
Zip: 21155
Phone: (410)429-5777
Fax: unknown
County: Baltimore
Website: Is this your listing? You can add a link to your website here just by adding a link on your site back to us! [click here to get started](#).
Email: unknown

Map Location

AskJeeves Blinklist Blogger Blogmarks Blogrolling Buddymarks CiteUlike
Del.iCio.us Del.iRio.us Digg Fark FeedMarker FeedMeLinks Furl
Kuro5hin Kinja Ma.gnolia Maple.nu Netvouz Newsvine RawSugar
Reddit Scuttle Spurl Shadows Shoutwire Simpy Slashdot Technorati
Wink Y! MyWeb IE Bookmark

More Addiction Resources:

atment Program | Drug and Alcohol Intervention | Drug Rehab Programs | Drug Rehab | Heroin Detox | Dual Diagnosis | Florida Drug Rehab

PROTESTANTS

EXHIBIT #

Date installed: August 2006

The Brantley Group @ Near Haven

ID#2414

Retreat or Conference Centre; Hotel, Guest House or B+B By appointment Outdoor Permanent

Wheelchair Accessible

Address: 14821 Hanover Pike
Upperco, Maryland 21155
United States
[view map](#)

Directions/notes: Located on a major arterial roadway (Route 30) connecting Maryland to Pennsylvania, Near Haven is thirty minutes northwest of downtown Baltimore, and within a two-hour drive to Annapolis, Philadelphia, or Washington, DC.

Contact: Robert Brantley
Phone: 410-625-2900
Fax: 410-625-2919
Email: brantley@brantleygroup.com

Web: <http://www.ExperienceNearHaven.com>

Schedule: Call for availability

Type: Contemporary
This Mobius inspired infinity-shaped labyrinth has as its single entrance and exit a round paver placed at the crossing point of the continuous path, encouraging prayer without ceasing.

Material: Brick/Paver

Prayer Garden Labyrinth @ Near Haven

PROTESTANTS
EXHIBIT #

PROTESTANT'S

EXHIBIT NO.

7



the professional association for keepers of the inn!



MD, United States

[+Return to PAII Site](#)

[+Terms of Use](#)

There are 39 matching records for this location.

Displaying page 2 of 4 pages.

Friendship Farm Bed & Breakfast 32739 Peach Orchard Road Pocomoke City, MD 21851 toll free: (800) 996-3134 phone: (410) 957-1094	no profile available
Georgian House B&B 170 Duke of Gloucester St Annapolis, MD 21401 toll free: (800) 557-2068 phone: (410) 263-5618 fax: (410) 263-5618 website: http://www.georgianhouse.com/	no profile available
Gramercy Mansion B&B 1400 Greenspring Valley Rd Box 119 Stevenson, MD 21153 toll free: (800) 553-3404 phone: (410) 486-2405 fax: (410) 486-1765 website: http://www.gramercymansion.com/	view
Harbor View Inn of Annapolis 1 St Mary's St Annapolis, MD 21401 phone: (410) 626-9802 fax: (301) 858-5401 website: http://www.harborviewinnofannapolis.com/	pr ava
Inn at 202 Dover 202 East Dover St Easton, MD 21601 phone: (410) 819-8007 fax: (410) 819-3368 website: http://www.innat202dover.com/	pr ava
Inn at 2920 2920 Elliott St Baltimore, MD 21224 toll free: (800) 774-2920 phone: (410) 342-4450 fax: (410) 874-8971 website: http://www.theinnat2920.com/	view profile
Inn at Huntingfield Creek LLC 4928 Eastern Neck Rd Rock Hall, MD 21661 phone: (410) 639-7779 fax: (410) 639-2924 website: http://www.huntingfield.com/	no profile available



PROTESTANTS
EXHIBIT # _____

See Pg. 2

PROTESTANT'S

EXHIBIT NO.

8



What?

Anything

e.g. Restaurant,
more examples...

Where?

e.g. San Francisco, CA,
more examples...

Opens When?

Anytime

e.g. 24 hours,
more examples...

Search

Massage Therapy



**Brantley
Group**

Massage Therapy

Main Business Hours:

See Features/Services Below

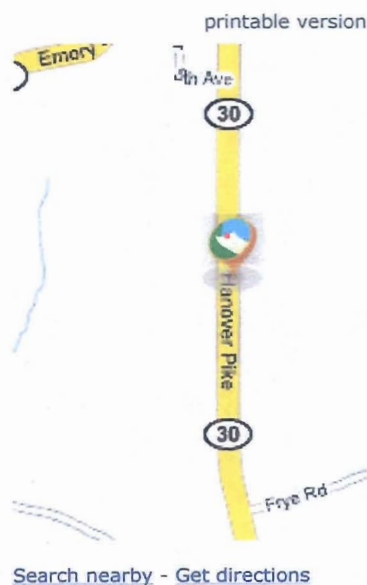
Contact Information:

Address: 14821 Hanover Pike
Upperco, MD

Phone #1: (410) 429-5777

Website:
<http://brantleygroup.com/>

Other Info:



GeoSpot

www.geospot.com



Coffee



Supermarket



Gas



Restaurant



Club

www.geospot.com

GeoSpot

Advertisement

PROTESTANTS
EXHIBIT # 9

Near Haven Hotel

Upperco House Vacation Rental

- Home
- About
- **Listing**
- Search
- Sign Up
- Owners
- Partners
- WebBlog
- Newest
- Specials
- Available

UPPERCO VACATION RENTAL HOUSE

WORLD > UNITED STATES > MARYLAND > UPPERCO

Over twenty years ago, Dr's. Astra and Robert Brantley had a vision of a wholistic, healing environment. They imagined a space that offered visitors a safe harbor from the storms of everyday life, a home that healed the whole body, the mind and the spirit, a facility that provided a place for transformation and positive, personal change. Today the Brantleys vision has been realized. Just a few minutes north of Baltimore, on a three acre parcel of anointed ground, you'll find Near Haven, a place of peace and a center of calm. There are the organic gardens, a labyrinth, meditative walkways, and of course, a spacious facility, all designed and dedicated to providing a safe, serene, and supportive integrative experience.



- ✈ Located **15 miles** from **hampstead**.
- ✈ Located **30 miles** from **Baltimore Washington Airport**.
- 🗺 **Map** of Upperco, Maryland United States.
- 📄 Detailed facts and information about **United States**.
- 🌐 experiencenearhaven.com [9 Visits]

Mailing Address: 14821 Hanover Pike Upperco, Maryland 21155 United States
 Floors: **2** | Floor Area: **350** square feet | Bathrooms: **1** | Entire Home Rented:
 Sleeps: **2** | Bedrooms: **1** | Beds: **King=0 Queen=0 Double=1 Twin=0** | Fully Furnished: ✓
 Pets Allowed: | Smoking Allowed: | Children Allowed: ✓ | Wheelchair Accessible: ✓

Features: Restaurant, Room Service, Luxurious Surroundings, Close to Nightlife, Located near a Golf Course, Housekeeper for Extra Charge, Cook for Extra Charge, Driver for Extra Charge, Car Available at Extra Charge, Powerboat at Extra Charge, Sailboat at Extra Charge, Golf Clubs at Extra Charge, Walk to Shopping, Public Transportation, Tourist Attractions, Garage

Amenities: Public Outdoor Pool, Private Hot Tub, Hair Dryer, Bath Towels Provided, Bed Linens Provided, Blankets Provided, Pillows Provided, Fireplace, Air conditioners in Each Room, Ceiling Fans, Dining Room Table, Kitchenette, Mini-Refrigerator, Telephone, Satellite - Cable TV, DVD Player, Stereo and Speakers, Computer, Broadband Internet, AM-FM Alarm Clock, Safe Deposit Box

Activities: Clothes Shopping, Site Seeing, Theme Park, Walking - Exploring, Cycling, Horseback Riding, Restaurants, Live Music Bars, Discotheques and Clubs, Something For Everyone

Rates are posted in **USD** [Change]
Near Haven Hotel is typically re
 Daily: ✓ | Weekly: ✓ | Monthly: ✓
 There is a **1 day Minimum Stay**
 Rented Per Day: ✓ | Per Week:

Low Season: \$160 USD Per Day
 January, February, March, September

Mid Season: \$175 USD Per Day

High Season: \$190 USD Per Day
 April, May, June, July, August

Notes: Please visit our website

📞 Contact Name: **Administrato**
 📞 Day phone: **+1 410-625-29**
 📞 Night phone: **+1 410-625-2**
 📞 Fax: **+1 410-625-2919**
 🕒 Best to Call: 24 Hours
 Administrator's Timezone: **GMT -5**

PROTESTANTS

EXHIBIT #1

PROTESTANT'S

EXHIBIT NO.

10

SAT 7/21/2007 9:30am-4pm \$175.00

VACATION HAVEN QUEST



A ONE-DAY GETAWAY!

Relax, Resolve, Renew @ Near Haven

YOUR HOSTESS: DR. ASTRA P. BRANTLEY, CLINICAL DIRECTOR OF THE BRANTLEY GROUP @ NEAR HAVEN

Join Dr. Brantley (psychologist) and her associates Ruth Busko (acupuncturist), Mary Douthit (massage & aroma therapist), and Lynette Lewis (personal fitness trainer) for a six-hour vacation treat that will bless you and teach you to RELAX, RESOLVE, AND RENEW @NEAR HAVEN. WELCOME to the place where location and therapy and personal service meet. Just minutes outside of Baltimore, Maryland, you will find a place of peace and a center of calm in this busy world - NEAR HAVEN.

Near Haven is your pastoral destination for the purpose of relaxing, resolving and renewing. Our integrated approach to optimum health brings together cultural, spiritual and therapeutic modalities, creating a holistic vision and therapeutic path toward a healthy mind, body, and spirit. Join us for a massage, aroma, acupuncture, acoustic, nutrition & therapeutic treat! NEAR HAVEN is 4 miles north of the beginning of Route 30, where Reisterstown Road and I-795 end.

TREAT YOURSELF TO A VACATION GETAWAY WITH NONE OF THE HASSLES!

14821 HANOVER PI

L155

410-625-2900

PROTESTANTS

EXHIBIT #

PROTESTANT' S

EXHIBIT NO.

11

America has crossed the threshold into the 21st century as the most prosperous and powerful nation on the planet. Gazing toward the vast frontier of the global economy, we see a rapidly changing landscape shaped by forces beyond the control of any individual or nation. Space Age technology, global finance, global markets and transnational corporations are impelling us toward an uncertain future.

We as a nation have benefited from modern technology. It has contributed to our economic success in the world. It has lengthened our life spans and shrunk to fractions of a second the transmission of a message or billions of dollars across the planet. The global economy has brought the American consumer a year-round cornucopia of goods from every corner of the world. Competitive forces continue to drive down the price of personal computers, video recorders, and cellular phone systems, putting unimaginably powerful tools of information and communication in the hands of the average citizen. Choice abounds.

But Americans have also seen harbingers of troubles to come: the disappearance of entire sectors of labor as robots, artificial intelligence, and advanced office machines enter the work place. Globalization has encouraged the flight of jobs and capital to lower-wage regions of the world. Blue-collar workers and middle management alike have become targets for corporate downsizing. Today, six Ph.D. computer scientists from India can be hired over the Internet for the price of a comparable American. Thousands of jobs have been lost to a computer chip. Even in the midst of our prosperity most of us feel powerless to control our own futures or unable to find meaning in our current condition.

There is an economic fault line running throughout America and the world which today's economic gurus seem unable to explain or remedy: the widening wealth and income gap between a tiny rich elite and multitudes of poor in every country (including the United States), and between developed and developing nations. Surrounded by global communications, the global economy, and our global environment, we cannot help but feel the tremors inside and outside our borders.

Seeing through the chaos of our rapidly changing world, one post-scarcity visionary of the 20th Century, lawyer-economist Louis Kelso, understood the power of technology either to liberate or dehumanize people. Popularly known as the inventor of the employee stock ownership plan (ESOP), Kelso observed that modern capital tools and their phenomenal power to "do more with less" have offered people an escape from scarcity to shared abundance.

As a lawyer Kelso also saw that the design of our "invisible" institutional environment and social tools determines the quality of people's relationship to technology. Intangibles, such as our laws and financial systems, determine which people will be included or excluded from sharing of access to equal economic opportunity, power and capital incomes.

Access to capital ownership, asserted Kelso, is as fundamental a human right as the right to the fruits of one's labor. Furthermore, Kelso argued, the democratization of capital credit is the "social key" to universalizing access to future ownership of productive wealth, so that every person, as an owner, could eventually gain income independence through the profits from one's capital.

"OWN OR BE OWNED"

FOR MORE INFORMATION ABOUT
JUSTICE UNIVERSITY
PLEASE CONTACT ROBERT L. BRANTLEY

14821 HANOVER PIKE
UPPERCO, MARYLAND 21155
410-625-2900
BRANTLEY@BRANTLEYGROUP.COM

JUSTICE UNIVERSITY

TRANSFORMING IMPERFECT SOCIAL SYSTEMS INTO STRUCTURES OF JUSTICE



The earth has the productive resources to eliminate poverty and injustice. Humanity is now in the process of developing the democratic and transparent communications infrastructure which can bring this about. The Universal Peacemakers Foundation presents **JUSTICE UNIVERSITY** in global Internet-based collaboration with the Center for Economic and Social Justice, the Global Justice Movement, and participating institutions of higher learning worldwide. *No Justice.....No Peace!*



PROTESTANT'S

EXHIBIT NO.

12

JUSTICE-BASED MANAGEMENT

Justice-Based Management (JBM) is a leadership philosophy and management system that applies universal principles of economic and social justice within business organizations. The ultimate purpose of JBM is to create and sustain ownership cultures that enhance the dignity and development of every member of the company, and to economically empower each person as an owner and worker.

JBM promotes a company's long-term profitability within the global marketplace by enabling all worker-owners to serve and provide higher value to the customer. JBM connects every worker's self-interest to the bottom-line and long-term success of the company.

The JBM process builds upon a written articulation of the philosophy and principles of the company's leader (typically the CEO or chairman of the board) and leadership core group, in terms of universal principles and core values of the company. JBM proceeds in stages to build a consensus upon these fundamental shared values and vision of the company within each work area of the company.

These articulated values provide the foundation for enhancing the productiveness of workers and company profitability, and include such structures as employee-monitored economic incentive programs, participation and governance structures, two-way communications and accountability systems, conflict management systems and future planning and renewal programs.

STRUCTURES OF JUSTICE promulgates the idea that everyone has direct responsibility for the common good, and for working with and through others to restructure defective or unjust economic and social institutions.

It is the global mission of JUSTICE UNIVERSITY to lead the discussion and the education of all people toward the common good.

STRUCTURES OF JUSTICE

THE JUST THIRD WAY

In a letter to the editor published by the Washington Post, CESJ President Norman Kurland challenged the Post's assertion that "there is in fact no 'third way to prosperity' ". While dismissing the Clinton-Blair version as a welfare-state amalgam of capitalism and socialism, Kurland posed the logical case for a real "third way":

"On the one hand there is capitalism, an economic system governed by market forces but where economic power is concentrated in the hands of a few who own or control productive capital. On the other hand, socialism, in its many forms, is an economic system governed centrally by a political elite, with even more highly concentrated ownership and economic power. Logically, a 'third way' would be a free-market system that economically empowers all individuals and families through direct and effective ownership of the means of production--the best check against the potential for corruption and abuse."

THE BASIC MORAL PROBLEM

"The basic moral problem that faces man as he moves into the age of automation, the age of accelerating conquest of nature, is whether he is really fit to live in an industrial society; whether his institutions will adjust rapidly enough; whether he will rivet himself with an absurd institution like full employment in the economic order when it is not only unnecessary but unadministratable in anything but a slave society; whether freed from the necessity to devote his brain and brawn to the production of goods and services, he can address himself to the work of civilization itself."



Louis O. Kelso, 1964

THE JUSTICE UNIVERSITY APPROACH

Our approach transcends left-wing/right-wing designations. At JUSTICE UNIVERSITY we see both conventional capitalism and socialism as being two arms of a philosophy which concentrate power in an elite, to the detriment of society as a whole. Reforming the current money system, to empower each and every person, is a key part of the just, third way.

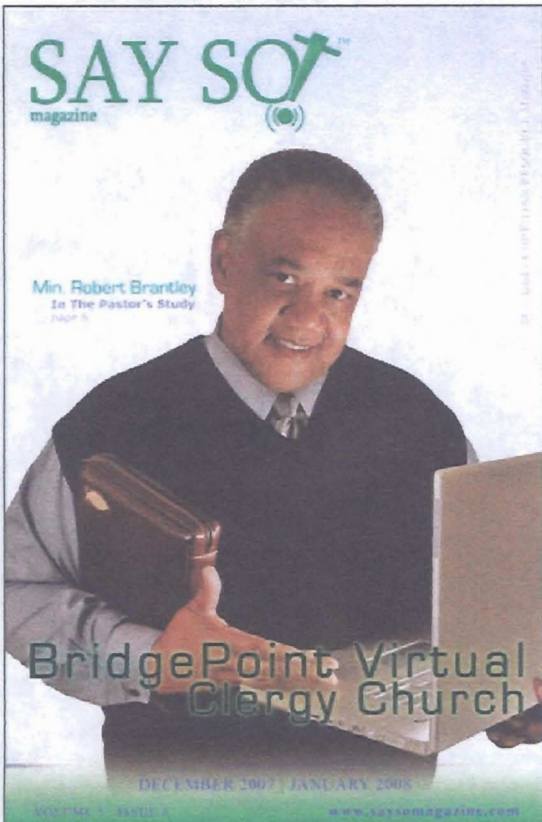
As a global Internet-based institution of higher learning, JUSTICE UNIVERSITY will serve as the world's digital library and classroom for Structures of Justice Curriculum, for the Just, Third Way, and for Justice-Based Management; and will collaborate with the Center for Economic and Social Justice, and the Global Justice Movement to involve institutions of higher learning around the world in the global transformation of imperfect social structures into **STRUCTURES OF JUSTICE.**





Relax. Resolve. Renew.

Announcing a new VIRTUAL CLERGY CHURCH www.saysomagazine.com



In The Pastor's Study
an interview with Min. Robert Brantley of BridgePoint Virtual Clergy Church

SAY SO! Before we get started, I just want to take a moment to thank you for your commitment and dedication to the Faith Forum and to Say So! Magazine as a whole.

Min. Brantley: Thank you for your faithful service to the body of Christ through Say So! Magazine. Your family has demonstrated great stewardship in this endeavor, and my wife and I are grateful for the opportunity to apply the Word of God toward the edification of God's people through the Faith Forum column. To God be the glory! SAY SO! Now, let's talk about BridgePoint Ministries. BridgePoint is a "virtual clergy church" and your brochure clearly states that it is "an unincorporated webbased global assembly." What do those terms mean exactly?

SAY SO! Now, let's talk about BridgePoint Ministries. BridgePoint is a "virtual clergy church" and your brochure clearly states that it is "an unincorporated webbased global assembly." What do those terms mean exactly?

Min. Brantley: BridgePoint Ministries is a sponsored program of The Universal Peacemakers Foundation, where Jesus is upheld as the "universal peacemaker." Our family established the Foundation more than a decade ago as a conduit for the "kingdom business" efforts of our family enterprise, The Brantley Group (part of the BAM "Business as Mission" movement that is exploding worldwide as the next great wave of evangelism.) BAM companies are more than examples of Christian capitalism; the business itself is a means to spread the gospel and to plant churches. The Foundation is a Maryland-based nonprofit tax-exempt corporation that sponsors and hosts BridgePoint Ministries at Near Haven, a beautiful 3-acre private estate that serves as the "home office" for our family enterprise. **Read More.....**

[Home](#)
[About Us](#)
[Services](#)
[Seminars & Workshops](#)
[Management](#)
[Resources](#)
[Contact Us](#)
[Links](#)

©2005-2007 Experience Near H

PROTESTANTS
EXHIBIT II

PROTESTANT' S

EXHIBIT NO.

13



NEAR HAVEN

As host for THE UNIVERSAL PEACEMAKERS FOUNDATION, Near Haven provide a perfect setting for the psychological, spiritual and whole health services we offer our clients. Fronted by a fruit orchard, the three acre Near Haven estate features a prayer garden, a meditative walking labyrinth, and an organic vegetable garden in the rear. The property is distinguished by its symphony of decorative flowers and shrubbery that are frequently visited by local birds and exotic butterflies.

In the spacious, sun drenched main complex, you are embraced by panoramic views of the grounds, and warmed in winter by a magnificent river stone fireplace and other interior appointments that must be experienced personally; such as the state-of-the-art acoustic therapy room which awaits to envelop you with soothing therapeutic music, ushering you into a state of deep relaxation. Our integrated approach to optimum health brings together cultural, spiritual and therapeutic modalities, creating a holistic vision and a therapeutic path toward a healthy mind, body and spirit.

DIRECTIONS:

From Baltimore - take 695 to 795 to Route 30 North, which is Hanover Pike

From DC - take 95N to 695 to 795 to Route 30 North, which is Hanover Pike

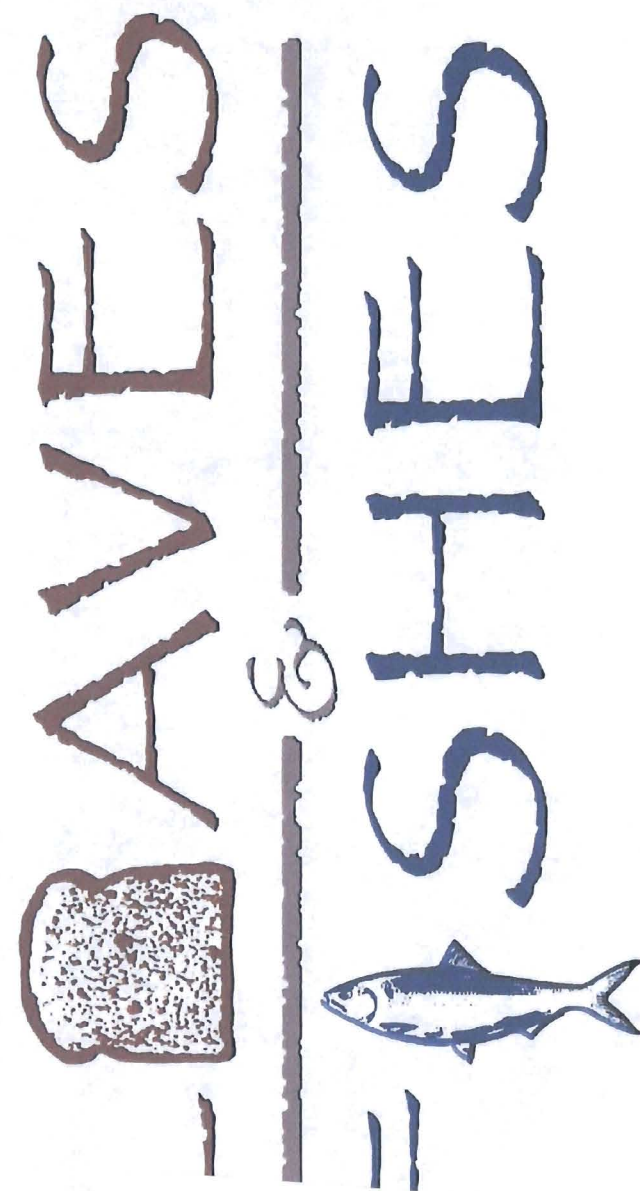
From Frederick or Carroll County - take 140 to Emory Road (91 E) to Route 30 S

From Pennsylvania - take Route 30 South to 14821 Hanover Pike

UNIVERSAL PEACEMAKERS FOUNDATION
FIVE-YEAR ENDOWMENT CAMPAIGN
14821 HANOVER PIKE
UPPERCO, MD 21155

LOAVES & FISHES

UNIVERSAL PEACEMAKERS FOUNDATION
FIVE-YEAR ENDOWMENT CAMPAIGN



PROTESTANT'S

EXHIBIT NO.

14

WELCOME To the place where location and therapy and personal service meet. Just minutes outside of Baltimore Maryland, you will find a place of peace and a center of calm in this busy world - **NEAR HAVEN**. Near Haven is your pastoral destination for the purpose of relaxing, resolving and renewing.

Near Haven's facilities provide a perfect setting for the psychological, spiritual and whole health services we offer our clients. Fronted by a fruit orchard, the three acre Near Haven estate features a prayer garden, a meditative walking labyrinth, and an organic vegetable garden in the rear. The property is distinguished by its symphony of decorative flowers and shrubbery that are frequently visited by local birds and exotic butterflies.

In the spacious, sun drenched main complex, you are embraced by panoramic views of the grounds, and warmed in winter by a magnificent river stone fireplace and other interior appointments that must be experienced personally; such as the state-of-the-art acoustic therapy room which awaits to envelop you with soothing therapeutic music, ushering you into a state of deep relaxation. Our integrated approach to optimum health brings together cultural, spiritual and therapeutic modalities, creating a holistic vision and a therapeutic path toward a healthy body, mind and spirit.

People are daily being blessed at Near Haven. Our peaceful facility, ongoing therapeutic programs, services, and Whole Health Biblical Stewardship Living lectures and classes for individuals, couples, families, and small groups make Near Haven your personal choice for help and healing toward whole health.

Robert & Astra Brantley



FROM BALTIMORE, DELAWARE, DC, OR VIRGINIA:

1. Take 695 to the exit for 795 toward Owings Mills.
2. Stay on 795 to the end.
3. As you approach the end of 795, you will see a sign to 30 North toward Hampstead/Manchester/Hanover (30 is also Hanover Pike).
4. Staying to your left, go thru the first stop light you come to; and turn left at the second stop light (When you turn left you will be on 30 North, or Hanover Pike).
5. Go exactly 4 (four) miles north on Hanover Pike, and look for 14821 on your right.
6. You will see the house on a hill, with many young fruit trees in the front yard.
7. If you come to a stop light on Hanover Pike, you have gone one mile too far.

FROM WESTMINSTER:

1. Take 140 towards Baltimore
2. Left on Route 91 (Emory Road) toward Route 30 (5 miles)
3. Right on Route 30 (Hanover Pike) heading south
4. Go one mile south to 14821 Hanover Pike
5. We are on your left, up the hill, in a Cap Cod style home.
6. The sign in the yard says NEAR HAVEN.

FROM HAMPSTEAD, MANCHESTER, OR PENNSYLVANIA:

1. Take Hanover Pike (Route 30) south to NEAR HAVEN.
2. We are 4 miles north of where Route 30 north starts.

THE BRANTLEY GROUP @ NEAR HAVEN
14821 Hanover Pike . Upperco, MD 21155
T: (410) 625-2900 F: (410) 625-2919
W: www.ExperienceNearHaven.com

COLLABORATIVE HEALTH CARE

BODY . MIND . SPIRIT

Dr. Astra P. Brantley
Christian Psychologist
& Media Personality

ph: 410-625-2900
fax: 410-625-2919
email: brantley@brantleygroup.com



14821 Hanover Pike, Upperco, MD 21155



THE BRANTLEY GROUP

@ Near Haven

MENTAL-HEALTH
SERVICES

"Better Than Home Made"

PROTESTANT'S

EXHIBIT NO.

15



**BRANTLEY GROUP
COLLABORATIVE SERVICES
@ NEAR HAVEN**

Individual Counseling and/or Psychotherapy

Marriage/Couples Counseling

Family Counseling

Psychological Assessments

Clinical Supervision

Case Consultation

Men's Groups

Women's Groups

Pastoral Retreats

Biblical Conflict Resolution

Financial & Estate Planning

Executive Coaching

Business Coaching

Clergy Coaching

BRANTLEY GROUP FEES

Our hourly fee (for each of us) has remained the same for the last three years, and it will remain the same in 2008 -- \$150.00 per hour, each.

Beginning January, 2008, all fees must be paid in advance by cash, check, credit or debit card.

We will help you submit claim forms for fee reimbursement from you insurance company.

You will be offered a BridgePoint Ministries VALUE CARD that you may use to deposit funds (using any of the means listed above) for the purchase of health care and other services and products at NEAR HAVEN. Your VALUE CARD will electronically track your deposits and purchases throughout the year; and you will be given a report of your NEAR HAVEN activity at the end of the year.

You will also be offered the opportunity to enter into a monthly payment plan with us, where you will make monthly deposits toward your VALUE CARD based upon a projection of your anticipated use of our services at NEAR HAVEN. Payment plans begin at \$50 per month (or \$600 per year). This is based upon anticipated use of our services four times per year at the rate of \$150 per hour (or \$600 per year). Greater usage of our services, the purchase of products, or special events will require a higher monthly payment.

Monthly payment plans also require the use of a credit or debit card that can be charged or debited monthly.

TAX-DEDUCTIBLE CONTRIBUTIONS

Your tax-deductible contributions to THE UNIVERSAL PEACEMAKERS FOUNDATION help us make our marriage workshops, peacemaker seminars, and special events available to needy, elderly, and military individuals, couples, and families.

Please go to our websites to contribute

www.BrantleyGroup.com

www.ExperienceNearHaven.com

- Fees paid to Bob Brantley, for services, for products, or for special events at NEAR HAVEN or other venues are not reimbursable by insurance.
- Fees paid to Astra Brantley for clinical psychology services qualify for reimbursement to you, the client, by your health insurer (depending upon your contract with your insurer).
- When you pay a fee to Astra Brantley, we will give you a cash receipt and a HCFA (Health Care Financing Administration) insurance claim form that you can submit to your insurer for reimbursement, according to your contract with them.
- We will continue to submit MEDICARE and TRICARE insurance claim forms directly through our office, so that we can continue to serve elderly and military individuals, couples, and families. All other clients will have to pay us "out of pocket" at our hourly rate, and then submit claim forms to their insurers for reimbursement, according to their contracts.

Bridge Over Troubled Waters

Billy Graham once said that "The situation in the organized and institutional church today is in danger. We may be losing the battle for the minds of men and women through materialism and secularism. Unless the trend is radically reversed, the institutional church may well go into decline. One of the problems is that the average person has little concept of what the church really is."

True church growth is the result of the church's being a healthy Body of Christ living in obedience to Him. When congregations are healthy, they grow the way God intends.

Bridge Point can help Pastors and churches "bridge the gap" between church growth and church health. The Bridge Point biblically based strategic approach frees the church for growth to honor God, to serve people, and to become the true Bride of Christ.

BRIDGE POINT "One of a Kind"

Distinct & Unique Qualifications:

- . Northwestern University School of Management trained M.B.A.
- . Licensed Clinical Psychologist with public and private experience
- . Ordained Minister of the Gospel of Jesus Christ
- . Certified Christian Conciliators for more than 15 years
- . Combined more than 30 years of service to the Body of Christ
- . Published in respected Christian professional journals and magazines
- . Founders of Stewardship Living Publications
- . Developers of premiere healing interventions such as:
 - 12 Week Stress Self Defense Prog.
 - Workshop, Support Group, Book for Targets of Workplace Bullying in Maryland (www.MDStopBully.com)
- . Creators of the Whole Health Biblical Stewardship Living Model @ Near Haven

Brantley Group @ Near Haven
14821 Hanover Pike
Upperco, Maryland 21155
Phone: 410.625.2900
Fax: 410.625.2919

Email:

brantley@brantleygroup.com
www.ExperienceNearHaven.com



BRIDGE POINT

Where Clinicians and Clergy Connect



**Counseling Services
to the Body of Christ**

PROTESTANT'S

EXHIBIT NO. _____

16

Let Us Help You With Christian-Biblical Counseling For Your Church

Bridge Point Overview

At Bridge Point, clinicians and clergy connect to provide effective Christian-biblical counseling services to the church, on a retainer basis. Our services include:

- professional resources to the Pastor: for case referral, case consultation and/or clinical supervision, for personal/professional continuing education and development, and for executive coaching
- direct services to church members: including individual, couples, and family counseling; personal or professional biblical conflict resolution; personal and family financial and estate planning; & whole health biblical stewardship living
- consulting services to the church, the Pastor, and the church Board.

Structuring Your Counseling Services

Bridge Point will help Pastors and churches structure counseling services to the congregation that meet the current and future needs of the church. All services are custom-designed, Christ-centered, Bible-based, and Spirit-led.

An Alternate Approach

Pastoral counseling by the Pastor, or any other member of the church, is at best problematic.

Confidentiality is almost impossible to maintain. Dual relationships are impossible to avoid. Counseling codes of ethics are not taught and maintained. Our people become suspicious of and distrustful toward counseling.

www.ExperienceNearHaven.com
RELAX . RESOLVE . RENEW



The church needs a better , more biblical, and more effective approach.

An alternate approach is for the church to retain Bridge Point as its provider of counseling services beyond the basic comfort, encouragement and exhortation that all believers are mandated to provide one to another.

Bridge Point is the place where clinicians and clergy meet to provide effective, confidential, and ethical Christian-biblical counseling services to the Body of Christ.

Let us help you today!

Pastors, please contact us with your contact information, and we will facilitate a private and confidential exploratory meeting.

Minister Robert L. Brantley is the Executive Director of Bridge Point, and the International Center for Clergy Coaching. His wife, Dr. Astra P. Brantley, is a Christian Clinical Psychologist & Director of the Institute for Christian Clinical Supervision.

SPECIAL EXCEPTION HEARING
 SEPTEMBER 24, 2008
 Case #2009-0042-SPHX
 ROBERT BRANTLEY
 14821 Hanover Pike RC2 Zone
 Religious worship, school, and camp, as a spiritual religious retreat center
 HEARING #1

Person	Q/A Content
WISEMAN	Introduction
CROSS	Calls Dr. Brantley to testify
CROSS	Gets site plan out.
CROSS	Is this your primary residence?
BRANTLEY	Yes
CROSS	What is the reason we are hear today?
BRANTLEY	To seek a permitted use on the property with <u>religious Christian retreat for small groups</u>
CROSS	How long have you owned this property?
BRANTLEY	4 years
CROSS	You have lived there 4 years?
BRANTLEY	Yes
CROSS	Every now and then you engage in spiritual retreats?
BRANTLEY	Yes, actually in addition to it being my home, I am a clergyman and use my home provided as a sanctuary to primarily the church leaders but actually to any Christians who are seeking sanctuary, guidance, critical issues in their lives be it personal, financial.
CROSS	What activities are you operating out of this house?
BRANTLEY	Primarily talking and listening...a lot of listening..to individuals, couples and small groups, listen a lot and counsel.. My wife and I....we talk about their issues encourage them...Teach them how to apply scripture to issues in their lives...We have bible study in small groups and occasionally we talk about living better, eating better, resting, we call our property Near Haven where you relax, resolve, renew, and so we encourage people to relax...there seems to be a problem we have in our culture, multitasking.. And we encourage them to resolve their issues and renew their commitment to a better lifestyle.
CROSS	Cross starts review of an aerial picture of the property
BRANTLEY	Center of this is our property...long driveway in the front...40 tree fruit orchard in the front organic vegetable garden in the rear...a large labyrinth in back of property that we use for meditative walking and prayer
WISEMAN	Meditative labyrinth?
BRANTLEY	A walking path...a guided walking path helping people to relax, resolve problems...and pray...it is also good exercise. This particular labyrinth is considered a circular classical labyrinth that was built by children by simply laying bricks on the ground and provides a great opportunity to just walk and enjoy the peace and quiet and tranquility of the property and whole neighborhood. We consider it an important part of the whole milieu of services we offer people.
CROSS	So... people come to your house as a spiritual retreat... How often and how many people at a time?

IDENTIFICATION ONLY
PROTESTANT'S

EXHIBIT NO. 17

Case No.: 2009-0042 - SPHX

14821 Hanover Pike

Exhibit Sheet

Petitioner/Developer

Protestant

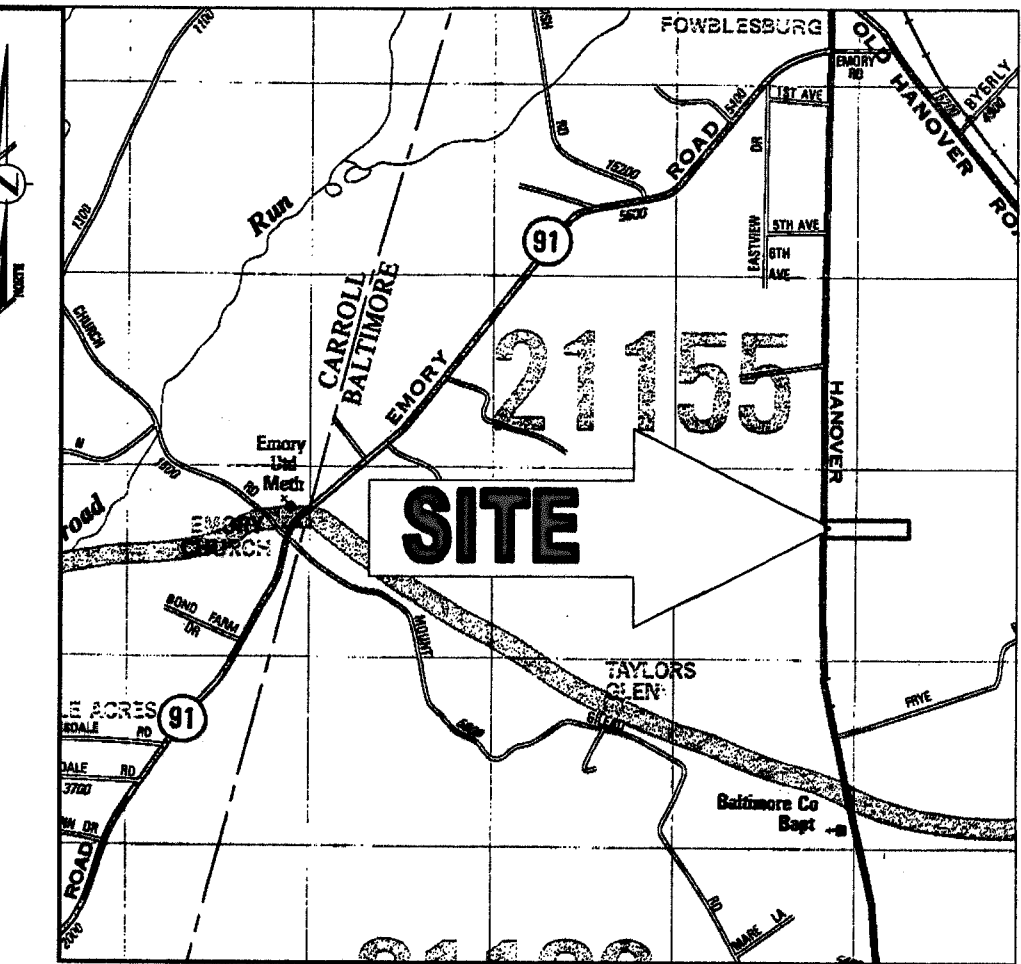
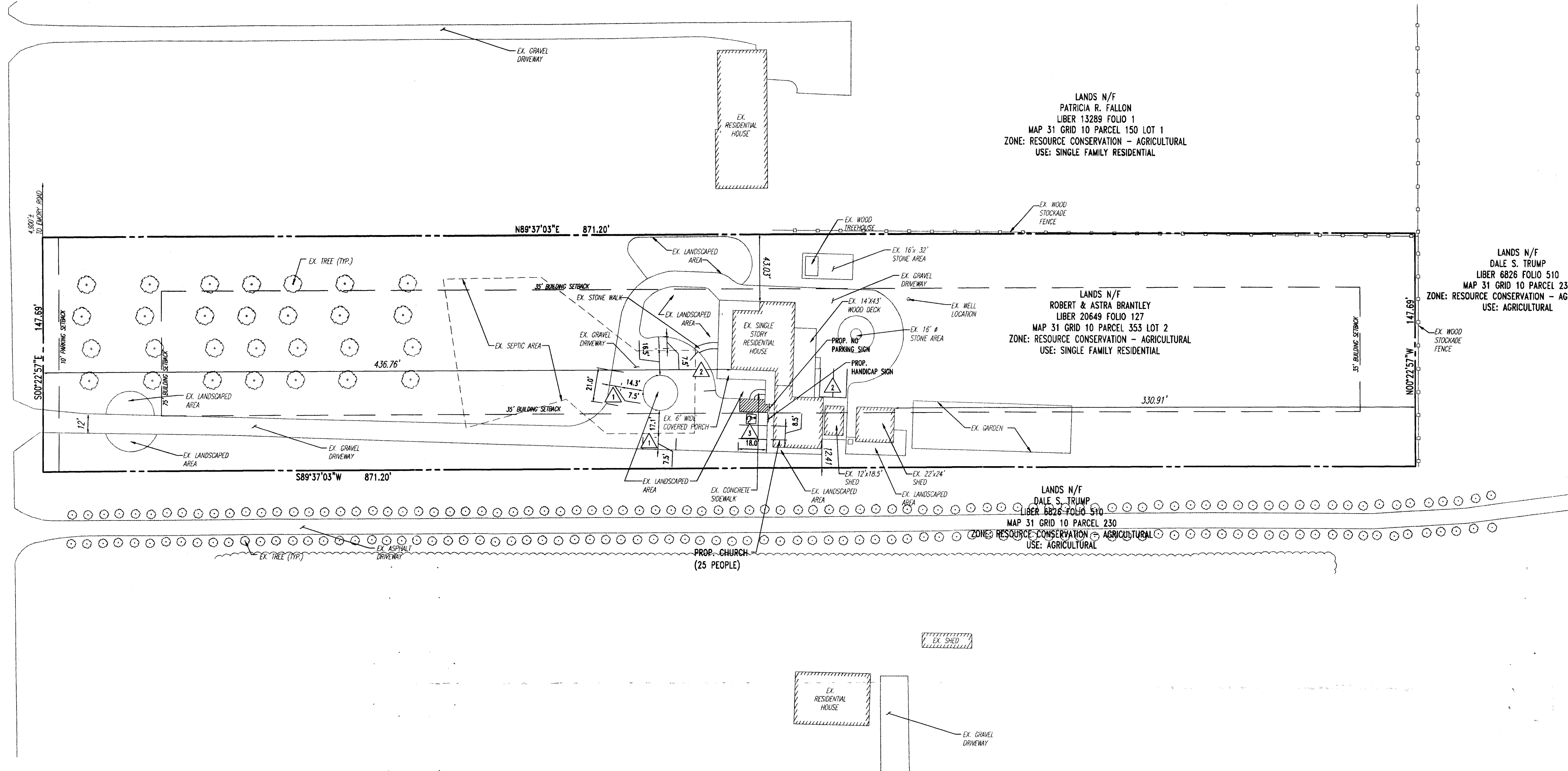
No. 1	Aerial View of Property	SPA ; SPARKLE internet advertisement
No. 2	SITE PLAN	EXECUTIVE MEETING & BUSINESS RETREAT @ NEAR HAVEN
No. 3	Matthew T. Allen, P.E. Curriculum Vitae	BARBARA AMBROS [Power Point Presentation]
No. 4		PLAT Discrepancies
No. 5		WEB SITE Advertisements
No. 6		Listed Brantley Group Alcohol + Drug Treatment
No. 7		Retreat Center Hotel ; Guest House on BHB
No. 8		Association OF INKEEPERS Page 2 - Retreat ; Host Home
No. 9		Advertise - Massage Therapy
No. 10		Hotel Advertisement with FEATURES BEING OFFERED
No. 11		Advertisement - massage acupuncture - fitness trainer
No. 12		JUSTICE UNIVERSITY - addressed at 14821 Hanover Pike



PETITIONER' S

EXHIBIT NO. /

HANOVER PIKE-MD. ROUTE 30



LOCATION MAP
COPYRIGHT ADC THE MAP PEOPLE
PERMIT USE NO. 20602153-5
SCALE: 1"=1000'

SITE INFORMATION

- 1.) SITE ADDRESS: 14821 HANOVER PIKE (MD ROUTE 30)
UPPERCO, MD 21155
- 2.) ZONING: R.C.2 (RESOURCE CONSERVATION - AGRICULTURAL) Map # 031B2
- 3.) SITE AREA: PARCEL 353-LOT 2: 128,502 SF OR 2.95 AC
- 4.) EXISTING FLOOR AREA: 3,026 S.F.
- 5.) PROPOSED FLOOR AREA: 3,026 S.F.
- 6.) DEED REFERENCE: LIBER 206/9, FOLIO 127
- 7.) OWNER: ROBERT & ASTRA BRANTLEY
14821 HANOVER PIKE
UPPERCO, MD 21155
- 8.) TAX ACCT. NO.: 04-2300004329
- 9.) ELECTION DISTRICT: 4TH (FOURTH)
- 10.) COUNCILMANIC DISTRICT: 3RD (THIRD)
- 11.) WATERSHED: GWYNNS FALLS
- 12.) SEWERSHED: 67
- 13.) CENSUS TRACT: 404201
- 14.) THERE ARE NO WETLANDS LOCATED WITHIN THIS SITE BOUNDARY.
- 15.) THE SITE IS NOT WITHIN A WATER, SEWER OR TRANSPORTATION BASIC SERVICES DEFICIENT AREA.
- 16.) EXISTING USE: SINGLE FAMILY DWELLING
- 17.) PROPOSED USE: SINGLE FAMILY DWELLING WITH PLACE OF RELIGIOUS WORSHIP
- 18.) THE SITE IS NOT LOCATED WITHIN THE 100 YEAR FLOOD PLAIN PER FEMA MAP #2400100-0205-B, DATED MARCH 2, 1981
- 19.) PERMITTED BUILDING HEIGHT: 35'

ZONING NOTES

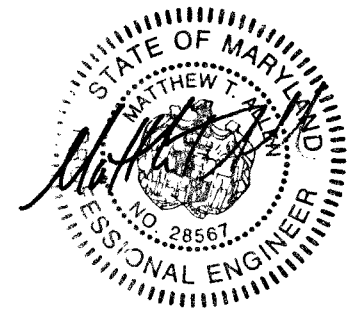
- 1.) SITE AREA: 128,502 SF OR 2.95 AC
- 2.) ACCESS POINTS:
 - A. EXISTING: ONE (1) 12' PAVED ENTRANCE OFF HANOVER PIKE (TO REMAIN)
 - B. PROPOSED: NO NEW ENTRANCES ARE PROPOSED
- 3.) PARKING:
 - SINGLE FAMILY DWELLING:
2 SPACES PER DWELLING UNIT
1 D.U. x 2 = 2 SPACES
 - PLACE OF WORSHIP:
1 SPACES PER 4 SEATS
25 SEATS/4 x 1 = 6.25 OR 7 SPACES
 - TOTAL SPACES REQUIRED = 9 SPACES
 - PROVIDED: 9 TOTAL SPACES (INCLUDING ONE (1) HANDICAP SPACE)
- 4.) REQUIRED SETBACKS:
 - A. BUILDING:

R.C.2. ZONE:	REQUIRED	PROVIDED
FRONT:	75'	436.76' (EX.)
SIDE (NORTH):	35'	43.03' (EX.)
SIDE (SOUTH):	35'	12.41' (EX.)
REAR:	35'	330.91' (EX.)
- 5.) ZONING HISTORY:
 - A. CASE NO. 00-284-A (DATED 2/4/2000) - VARIANCE APPROVED TO PERMIT AN EXISTING SINGLE FAMILY DWELLING ADDITION AND GARAGE TO HAVE A SIDE YARD SETBACK OF 3 FEET IN LIEU OF THE PERMITTED 35 FEET.

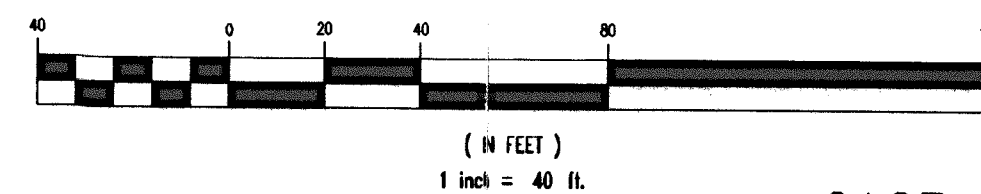
ZONING RELIEF REQUESTED

- 1.) SPECIAL EXCEPTION - SECTION 1A01.2.C(4), (6) & (23) FOR USE OF AN EXISTING BUILDING FOR RELIGIOUS WORSHIP, SCHOOL AND CAMP AS A SPIRITUAL RELIGIOUS RETREAT CENTER.
- 2.) SPECIAL HEARING (IF REQUIRED) -
 - A. A MODIFIED PARKING PLAN PURSUANT TO SECTION 409.12 OF THE BCZR.
 - B. FOR SUCH OTHER AND FURTHER RELIEF AS MAY BE DEEMED NECESSARY BY THE ZONING COMMISSIONER.

PETITIONER'S
EXHIBIT NO. 2



GRAPHIC SCALE



CASE #2009-0042-SPHX

DRAWN BY:	M.J.G.
CHECKED BY:	M.T.A.
DATE:	08/06/08
SCALE:	1" = 40'

PROJECT:
SPECIAL EXCEPTION PLAN

FOR

ROBERT & ASTRA
BRANTLEY

14821 HANOVER PIKE
UPPERCO, MD

SHEET TITLE:
PLAN TO ACCOMPANY
SPECIAL EXCEPTION
HEARING

SHEET NUMBER:
1
OF 1

RESUME

Matthew T. Allen, P.E.
Project Manager

EDUCATION:

- M.B.A. Finance, The Pennsylvania State University, Middletown, PA
- B.S. Civil Engineering, The Pennsylvania State University, University Park, PA

LICENSE:

- Delaware Professional Engineer, #13499
- District of Columbia Professional Engineer, #PE900965
- Maryland Professional Engineer, #28567
- Pennsylvania Professional Engineer, #PE061707
- Virginia Professional Engineer, #040239979

PROJECT TESTIMONY:

Testified on behalf of Bohler Engineering, P.C. in numerous municipalities before Planning Commissions, Board of Supervisors, Zoning Hearing Boards and related municipal entities in Delaware, Maryland, and Pennsylvania.

EXPERIENCE:

Currently serves as a Project Manager in Bohler Engineering, P.C.'s Towson, Maryland Office. Experience includes seven years of design and project management. Primarily responsible for client and project management for various commercial, residential and industrial developments. Areas of experience include site feasibility analysis and budgeting, site layout and planning, zoning and subdivision ordinance review/interpretation, horizontal and vertical roadway design, site grading, earthwork balancing and analysis, soil erosion and sediment control measures and facilities, utility design, stormwater management and water quality system designs, environmental compliance/evaluations, lighting photometric studies/design, signage compliance, landscaping design, vehicular circulation design, oversight of expediting and application approvals, and related services. Expertise includes supermarkets, service stations, maintenance facilities, restaurants, shopping centers, retail centers, car washes and other related projects in municipalities in Maryland, Virginia, District of Columbia, Delaware, and Pennsylvania.

PROFESSIONAL AFFILIATIONS:

- National Society of Professional Engineers
- Maryland Society of Professional Engineers

PETITIONER' S

EXHIBIT NO.

3