

IN RE: PETITION FOR SPECIAL HEARING  
S/S Willow Avenue, 183' E of the c/l  
York Road  
(14 Willow Avenue)  
9<sup>th</sup> Election District  
4<sup>th</sup> Council District

Edward O. Randall, Jr., et ux  
Petitioners

\* BEFORE THE  
\* ZONING COMMISSIONER  
\* OF BALTIMORE COUNTY  
\* Case No. 01-532-SPH  
\*

\* \* \* \* \*

FINDINGS OF FACT AND CONCLUSIONS OF LAW

This matter comes before the Zoning Commissioner for consideration of a Petition for Special Hearing filed by the owners of the subject property, Edward O. Randall, Jr., and his wife, Evelyn B. Randall, through their attorney, Edward C. Covahey, Jr., Esquire. The Petitioners request a special hearing to approve an existing service garage and general (non-medical) offices on the subject property, split zoned R.O. and B.M.-A.S, as nonconforming, pursuant to Section 104 of the Baltimore County Zoning Regulations (B.C.Z.R.). The subject property and requested relief are more particularly described on the site plan submitted which was accepted into evidence and marked as Petitioner's Exhibit 1.

Appearing at the requisite public hearing in support of the request were Edward O. Randall, Jr., property owner, Douglas L. Kennedy, Professional Engineer who prepared the site plan for this property, and Edward C. Covahey, Jr., Esquire, attorney for the Petitioners. Also appearing on behalf of the Petitioners were John L. Katsafanas, John W. McGrain, Jr., Joseph E. Smith, Clarence Myers, Leo Maenner and Marian Carswell. Appearing as Protestants/interested persons in the matter were numerous residents from the surrounding locale, including Stacy Weiss, Richard Parsons, Constant Georges, Albert Blaize, Kenneth B. Cronin, Betty M. Lake, Marlon Williams, Elizabeth Clifford and Margaret Muhl, all of whom were represented by Douglas B. Riley, Esquire.

ORDER RECEIVED FOR FILING  
Date 3/6/12  
By [Signature]

Testimony was received in support of the request from Douglas L. Kennedy, the engineer who prepared the site plan. He testified that the subject property is an irregularly shaped parcel, located on the north side of Willow Avenue, just east of York Road in Towson. The property contains approximately .26 acres in area, split zoned R.O. (.25 acres) and B.M.-A.S. (.01 acres), and is improved with a one-story block service garage building which contains six (6) service bays, parts storage, and general office space. The balance of the site is paved and contains an area for parking and storage of motor vehicles. Mr. Kennedy also presented the history of the zoning of the property. Under the 1955 zoning maps, the property was predominantly zoned B.R. with a small portion zoned R.A. In 1971, the zoning was changed to B.R.-C.S.A. with a small portion zoned D.R.16. A series of maps showing the zoning in effect in 1955, 1971, 1980, 1996 and 2000 were collectively submitted into evidence as Petitioner's Exhibit 2.

Testimony was also received on behalf of the Petition from Joseph E. Smith, who indicated that he "grew up" on this property. He is now 76 years of age and has been familiar with the property since the 1940s. Originally, he obtained his first job at this site, washing cars and performing light maintenance work on automobiles. After a brief stint in the military, he returned to the site in the late 1940s and continued working on the property through the 1950s. The original business changed hands over the years, but Mr. Smith maintained that the use of the subject property as a service garage has been continuous and without interruption since the 1940s. Some of the businesses that have operated on the property are Anderson Motors (1940s, '50s, and '60s) and Keckner's Motors (1970s). The use presently trades under the name of Ray's Auto Service.

In addition to Mr. Smith's testimony, the Petitioners also offered a copy of an Order of Dismissal issued on April 25, 1978 by then Zoning Commissioner S. Eric DiNenna. That Order was issued as a result of a complaint filed with his office regarding an alleged violation of the zoning regulations. Essentially, the Order confirms that the use is nonconforming.

The term "nonconforming use" is defined in Section 101 of the B.C.Z.R. and regulated by Section 104 thereof. A nonconforming use is defined as "A legal use that does not conform to a use regulation for the zone in which it is located or to a special regulation applicable to such a

ORDER RECEIVED FOR FILING  
Date 3/6/12  
By [Signature]

use.” Essentially, the nonconforming use designation is applied to grandfather an otherwise illegal use. If it is established that a use pre-dates the effective date of the zoning regulation or classification which prohibits that use, the use may remain as nonconforming. Although nonconforming uses are not favored at law, they are recognized and protected. Limitations upon the expansion or intensification of nonconforming uses are regulated by Section 104 of the B.C.Z.R. (See also, McKemy v. Baltimore County, 39 Md. App. 257 (1978)).

The undisputed testimony of Mr. Smith was persuasive that the subject property is nonconforming. I easily find that the service garage use has existed on the subject property since prior to the effective date of the zoning classification which prohibited that use (1971).

The Protestants/interested persons who appeared did not object to the nonconforming designation of the use, per se; however, they are concerned about the use and potential expansion thereof. Moreover, an issue was raised as to whether the property is no longer a service garage, but a “transit storage and repair yard.” As defined in Section 101 of the B.C.Z.R., a transit storage and repair yard is “A site used primarily for the storage of maintenance, common carrier vehicles, and for the repair of equipment associated with such vehicles.” Apparently, the site frequently is occupied by a number of taxi cabs and the neighbors are concerned about that activity. In response thereto, the Petitioners indicated that although taxi cabs are serviced on the site, the primary use of the property is that of a service garage. It was indicated that cabs are only an incidental part of the overall business. In any event, the Petitioners and the Protestants through their counsel agreed to the imposition of certain restrictions/conditions if special hearing relief is granted and the nonconforming use established.

In that I find that the property is nonconforming, I will therefore grant the Petition for Special Hearing and impose the restrictions and conditions agreed to between the parties. Those are listed fully in the Order that follows. In my judgment, these conditions and restrictions are appropriate and will protect the health, safety and general welfare of the locale. They are imposed pursuant to the authority of the Zoning Commissioner, as set out in Section 500.7 of the B.C.Z.R.

Date: 3/6/02  
By: [Signature]

Pursuant to the advertisement, posting of the property and public hearing on this Petition held, and for the reasons set forth herein, the relief requested shall be granted.

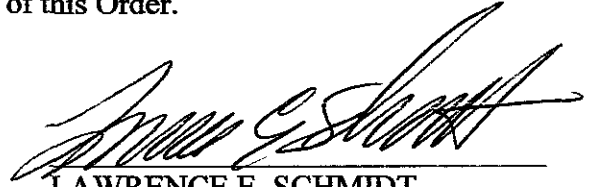
THEREFORE, IT IS ORDERED by the Zoning Commissioner for Baltimore County this 6th day of March, 2002 that the Petition for Special Hearing to approve an existing service garage and general (non-medical) offices on the subject property, split zoned R.O. and B.M.-A.S, as nonconforming, pursuant to Section 104 of the Baltimore County Zoning Regulations (B.C.Z.R.), and in accordance with Petitioner's Exhibit 1, be and is hereby GRANTED, subject to the following restrictions:

- 1) The Petitioners are hereby made aware that proceeding at this time is at their own risk until the 30-day appeal period from the date of this Order has expired. If an appeal is filed and this Order is reversed, the relief granted herein shall be rescinded.
- 2) No motor vehicles will be serviced (i.e., mechanical and/or body/fender work) on Willow Avenue or upon the apron of the driveway leading from Willow Avenue into the subject property.
- 3) Test driving of vehicles serviced on site shall be performed on York Road and not Willow Avenue. Therefore, when exiting the property to perform a test drive, service personnel shall turn left onto Willow Avenue, heading west to York Road.
- 4) Storage and service of motor vehicles will be on the subject property and not on adjacent properties or public streets.
- 5) To the extent possible, customers shall not park their vehicles on the driveway apron. Vehicles parked there shall be expeditiously relocated to a service bay or storage area on the site.
- 6) No flatbed or tow trucks will be parked on Willow Avenue for more than 15 minutes.
- 7) No taxi cabs shall be registered to an owner bearing the subject address of 14 Willow Avenue.
- 8) There will be no dispatching of taxi cabs from the subject site. Moreover, no taxis shall queue along Willow Avenue awaiting dispatch.
- 9) Taxi drivers will not conduct business meetings, turn in paper work, or perform other incidental activities related to their occupation on the premises.

ORDER REQUESTED FOR FILING  
Date 3/6/02  
By [Signature]

10) No taxis shall be parked on Willow Avenue unless those taxis are leased or owned by people who actually reside on that street.

11) When applying for any permits, the site plan filed must reference this case and set forth and address the restrictions of this Order.



LAWRENCE E. SCHMIDT  
Zoning Commissioner  
for Baltimore County

LES:bjs

ORDER  
DATE  
BY  
3/6/12  
JEP



Baltimore County  
Zoning Commissioner

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

March 6, 2002

Edward C. Covahey, Jr., Esquire  
Covahey & Boozer  
614 Bosley Avenue  
Towson, Maryland 21204

RE: PETITION FOR SPECIAL HEARING  
S/S Willow Avenue, 183' E of the c/l York Road  
(14 Willow Avenue)  
9<sup>th</sup> Election District - 4<sup>th</sup> Council District  
Edward O. Randall, Jr., et ux - Petitioners  
Case No. 01-532-SPH

Dear Mr. Covahey:

Enclosed please find a copy of the decision rendered in the above-captioned matter. The Petition for Special Hearing has been granted, in accordance with the attached Order.

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

Very truly yours,

LAWRENCE E. SCHMIDT  
Zoning Commissioner  
for Baltimore County

LES:bjs

cc: Mr. & Mrs. Edward O. Randall, Jr., 16 Alderman Court, Lutherville, Md. 21093  
Douglas B. Riley, Esquire, 25 S. Charles Street, Suite 2115, Baltimore, Md. 21201  
Ms. Stacy Weiss, 220 E. Susquehanna Avenue, Towson, Md. 21286  
Mr. Richard Parsons, 412 Woodbine Avenue, Towson, Md. 21204  
Ms. Constant Georges, 112 Burke Avenue, Towson, Md. 21286  
Mr. Albert Blaize, 47 Willow Avenue, Towson, Md. 21286  
Mr. Kenneth B. Cronin, KFC, 200-204 York Road, Towson, Md. 21204  
Ms. Betty M. Lake, 28 Willow Avenue, Towson, Md. 21286  
Mr. Marlon Williams, 32 Willow Avenue, Towson, Md. 21286  
Ms. Elizabeth Clifford, 32 Willow Avenue, Towson, Md. 21286  
Ms. Margaret Muhl, 212 Wilder Drive, Towson, Md. 21286  
People's Counsel; Case File

Come visit the County's Website at [www.co.ba.md.us](http://www.co.ba.md.us)





# Petition for Special Hearing

to the Zoning Commissioner of Baltimore County

for the property located at 14 Willow Avenue  
which is presently zoned R.O. and BM-AS

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

PURSUANT TO SECTION 104 (B.C.Z.R.) AN EXISTING NON-CONFORMING USE SERVICE GARAGE AND GENERAL (NON-MEDICAL) OFFICES LOCATED IN A R.O. (RESIDENTIAL-OFFICE) ZONE AS SHOWN ON PROVIDED SITE PLAN.

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:

Edward C. Covahey, Jr.  
Name - Type or Print \_\_\_\_\_  
Signature \_\_\_\_\_  
Covahey & Boozer, P.A.  
Company \_\_\_\_\_  
614 Bosley Ave. 410-828-9441  
Address Telephone No. \_\_\_\_\_  
Baltimore MD 21204  
City State Zip Code

### Legal Owner(s):

Edward O. Randall, Jr.  
Name - Type or Print \_\_\_\_\_  
Signature \_\_\_\_\_  
Evelyn B. Randall  
Name - Type or Print \_\_\_\_\_  
Signature \_\_\_\_\_  
16 Alderman Court 410-823-8294  
Address Telephone No. \_\_\_\_\_  
Lutherville MD 21093  
City State Zip Code

### Representative to be Contacted:

Edward O. Randall, Jr.  
Name \_\_\_\_\_  
16 Alderman Court 410-823-8294  
Address Telephone No. \_\_\_\_\_  
Lutherville MD 21093  
City State Zip Code

### OFFICE USE ONLY

ESTIMATED LENGTH OF HEARING \_\_\_\_\_

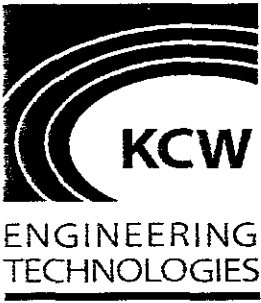
UNAVAILABLE FOR HEARING \_\_\_\_\_

Reviewed By JNP Date 6/19/01

ORDER REC'D FOR FILING  
Date 3/6/02  
By [Signature]

Case No. 01-532-SPH

RECEIVED 9/15/98



KCW Engineering Technologies, Inc.  
3104 Timanus Lane, Suite 101  
Baltimore, MD 21244

(410) 281-0030  
Fax (410) 298-0604  
www.KCW-ET.com

William K. Woody  
*President and CEO*

Douglas L. Kennedy  
*Senior Vice President*

J. Peter McDonnell  
*Vice President*

Ronald J. Lind  
*Associate Vice President*

Edwin S. Howe, III  
*Associate Vice President*

Joseph P. Wood  
*Associate*

William C. Usher  
*Associate*

Reginald C. Roberts  
*Associate*

Jay Wooldrige  
*Associate*

## ZONING DESCRIPTION

PROPERTY OF EDWARD O. RANDALL and EVELYN B. RANDALL

### #14 WILLOW AVENUE 9<sup>th</sup> Election District Baltimore County, Maryland

Beginning at a point on the South right-of-way line of Willow Avenue, 40 ft. wide, said Point of Beginning being situate 183 ft. East of the centerline of York Road, 66 ft. wide, thence the following courses and distances:

1. S 84°45' E 59.00 ft.
2. S 05°11' W 122.50 ft.
3. N 83°00' W 55.50 ft.
4. S 06°30' W 19.00 ft.
5. S 83°30' E 6.00 ft.
6. S 06°30' W 50.50 ft.
7. N 89°38' W 48.80 ft.
8. N 17°05' E 196.40 ft. to the place of beginning.

Containing 11,392 s.f., or 0.26 acres, of land, more or less.

As recorded in Deed liber 6668 folio 330.



01-532-SPH



BALTIMORE COUNTY, MARYLAND  
OFFICE OF BUDGET & FINANCE  
MISCELLANEOUS RECEIPT

No. 3312

DATE 6/19/01 ACCOUNT R-001-006-6150

AMOUNT \$ 250.00

RECEIVED FROM: Leo's Auto, Inc.

FOR: 14 Willow Ave. (01-532-SPH)

Special Hearing (Roundall)

DISTRIBUTION  
WHITE - CASHIER      PINK - AGENCY      YELLOW - CUSTOMER

PAID RECEIPT

PAYMENT	ACTUAL	TIME
6/19/2001	6/19/2001	08:42:11
4502	CASHIER	SMAT SMAT DRYMER
RECEIPT # 177196		2 OFLN
Dept 5	528	ZONING VERIFICATION
CR NO.	003312	

Receipt Tot 250.00  
250.00 CK .00 CA  
Baltimore County, Maryland

CASHIER'S VALIDATION

**NOTICE OF ZONING HEARINGS**

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: #01-532-SPH  
14 Willow Avenue  
S/S Willow Avenue, 183<sup>rd</sup> E York Road  
9th Election District  
4th Councilmanic District  
Legal Owner(s): Evelyn B. & Edward O. Randall, Jr.  
Special Hearing: to approve existing non-conforming use service garage & general (non-medical) offices located in a R.O. (Residential-Office zone).  
Hearing: Friday, August 24, 2001 at 9:00 a.m. in Room 407, County Courts Building, 401 Bosley Avenue.

LAWRENCE E. SCHMIDT  
Zoning Commissioner for Baltimore County

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

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

/8/118 Aug. 9 C486227

**CERTIFICATE OF PUBLICATION**

8/9/2001

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 8/9/2001.

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

J. Wilkinson

LEGAL ADVERTISING

**CERTIFICATE OF PUBLICATION**

1/31/2002

THIS IS TO CERTIFY, that the annexed advertisement was published in the following weekly newspaper published in Baltimore County, Md., each of 1 successive weeks, the first publication appearing on 1/29/2002.

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

J. Wilkinson

LEGAL ADVERTISING

CERTIFICATE OF POSTING

9/10

RE: Case No.: 01-532 SPH

Petitioner/Developer: RANDALL, ETA  
c/o COVAHEY, ESQ

Date of Hearing/Closing: 8/24/01  
@ 11:00 AM  
- REVISED HOUR -

887-3468

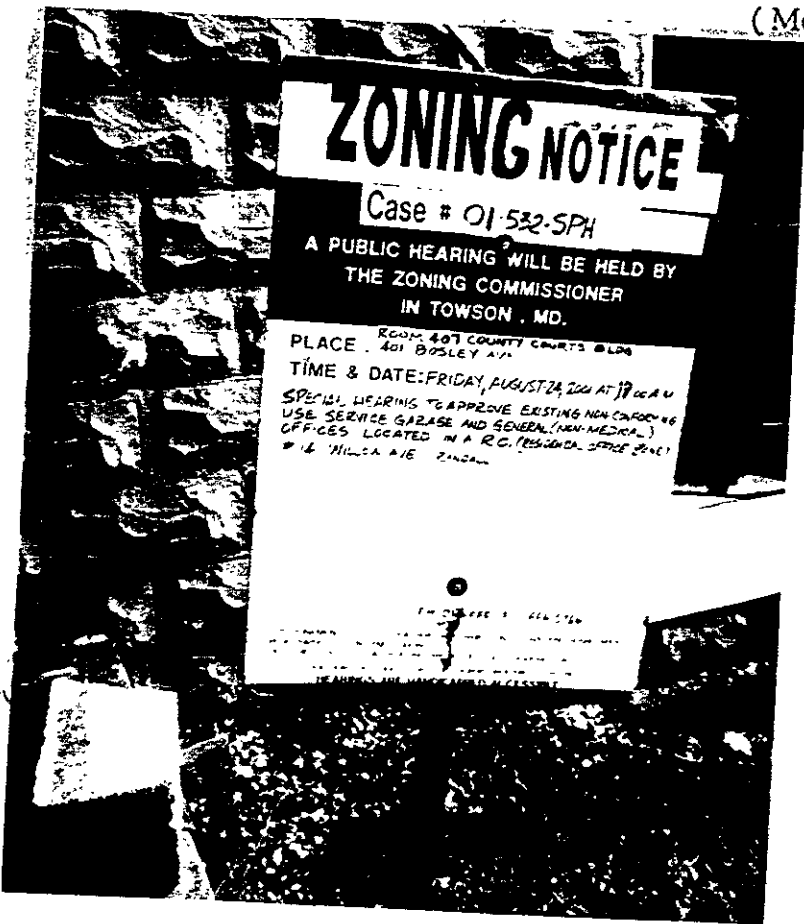
Baltimore County Department of  
Permits and Development Management  
County Office Building, Room 111  
111 West Chesapeake Avenue  
Towson, MD 21204

Attention: Ms. Gwendolyn Stephens

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 # 14 WILLOW AVE.

The sign(s) were posted on 8/3/01  
(Month, Day, Year)



Sincerely,

Patrick M. O'Keefe 8/3/01  
(Signature of Sign Poster and Date)

PATRICK M. O'KEEFE  
(Printed Name)

523 PENNY LANE  
(Address)

HUNT VALLEY, MD. 21030  
(City, State, Zip Code)

410-666-5366 ; CELL 410-905-8571  
(Telephone Number)

CERTIFICATE OF POSTING

RE Case No. 01-532-SPH

Petitioner/Developer RANDALL, ETAL  
COVAHEY

Date of Hearing/Closing: 9/10/01  
NEW DATE

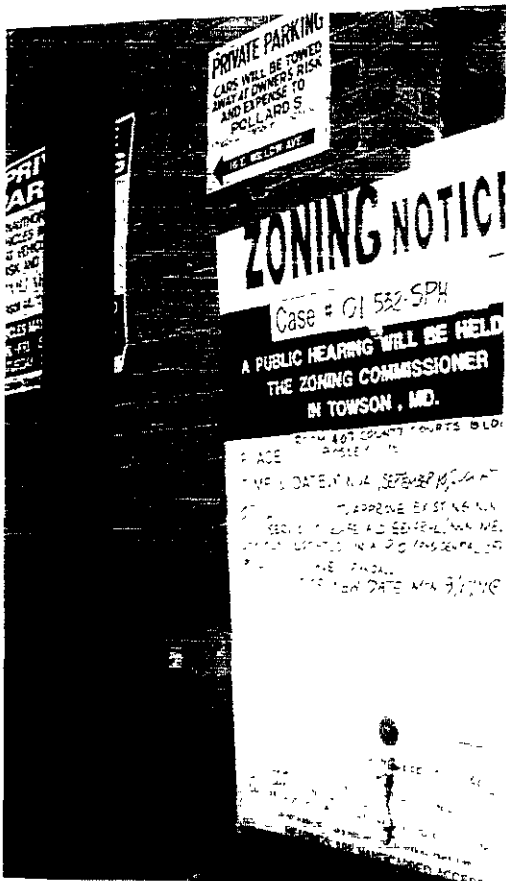
Baltimore County Department of  
Permits and Development Management  
County Office Building, Room 111  
111 West Chesapeake Avenue  
Towson, MD 21204

Attention: Ms. Gwendolyn Stephens / MR. GEORGE ZAHNER

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 #14 WILLOW AVE.

The sign(s) were posted on 10/25/01  
(Month, Day, Year)



Sincerely,  
[Signature] 10/27/01  
(Signature of Sign Poster and Date)

PATRICK M. O'KEEFE  
(Printed Name)

523 PENNY LANE  
(Address)

HUNT VALLEY, MD. 21030  
(City, State, Zip Code)

410-666-5366 ; CELL 410-905-8571  
(Telephone Number)

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.

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For Newspaper Advertising:

Item Number or Case Number: 01-532-SPH  
Petitioner: EDWARD D. RANDALL & EVELYN B. RANDALL  
Address or Location: \* 14 WILLOW AVENUE

PLEASE FORWARD ADVERTISING BILL TO:

Name: EDWARD D. RANDALL  
Address: 16 ALDERMAN COURT  
TIMONIUM, MD. 21093  
Telephone Number: 410-823-8294



Baltimore County  
Department of Permits and  
Development Management

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

July 18, 2001

## NOTICE OF ZONING HEARING

CORRECTED DATE

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

CASE NUMBER: 01-552-A  
33 Willow Avenue  
9<sup>th</sup> Election District – 4<sup>th</sup> Councilmanic District  
Legal Owner: Keith Davis

Formal Demand For Hearing to approve use of dwelling as a Boarding House.

HEARING: Tuesday, August 14, 2001 at 9:00 a.m. in Room 407, County Courts Building, 401 Bosley Avenue

Arnold Jablon GDZ  
Director

C: Keith Davis, 33 Willow Avenue, Towson 21286  
Stacy Weiss (TMVCA) President, 220 Susquehanna Avenue, Towson 21286

- NOTES: (1) **THE PETITIONER MUST HAVE THE ZONING NOTICE SIGN POSTED BY AN APPROVED POSTER ON THE PROPERTY BY MONDAY, JULY 30, 2001.**
- (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.

TO: PATUXENT PUBLISHING COMPANY  
Tuesday, July 31, 2001 Issue – Jeffersonian

Please forward billing to:  
Edward D Randall  
16 Alderman Court  
Timonium MD 21093

410 823-8294

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## NOTICE OF ZONING HEARING

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

CASE NUMBER: 01-532-SPH  
14 Willow Avenue  
S/S Willow Avenue, 183' E York Road  
9<sup>th</sup> Election District – 4<sup>th</sup> Councilmanic District  
Legal Owners: Evelyn B & Edward O Randall Jr

Special Hearing to approve existing non-conforming use service garage & general (non-medical) offices located in a R.O. (Residential-Office zone).

HEARING: Wednesday, August 15, 2001 at 2:00 p.m. In Room 407, County Courts Building, 401 Bosley Avenue

  
Lawrence E. Schmidt

LAWRENCE E. SCHMIDT G>Z  
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  
Department of Permits and  
Development Management

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

July 19, 2001

## NOTICE OF ZONING HEARING

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

CASE NUMBER: 01-532-SPH  
14 Willow Avenue  
S/S Willow Avenue, 183' E York Road  
9<sup>th</sup> Election District – 4<sup>th</sup> Councilmanic District  
Legal Owners: Evelyn B & Edward O Randall Jr

Special Hearing to approve existing non-conforming use service garage & general (non-medical) offices located in a R.O. (Residential-Office zone).

HEARING: Wednesday, August 15, 2001 at 2:00 p.m. In Room 407, County Courts Building, 401 Bosley Avenue

A handwritten signature in cursive script, appearing to read "Arnold Jablon".

Arnold Jablon GJZ  
Director

C: Edward C Covahey Jr, Covahey & Boozer PA, 614 Bosley Avenue, Towson 21204  
Evelyn B & Edward O Randall Jr, 16 Alderman Court, Lutherville 21093

- NOTES: (1) **THE PETITIONER MUST HAVE THE ZONING NOTICE SIGN POSTED BY AN APPROVED POSTER ON THE PROPERTY BY TUESDAY, JULY 31, 2001.**
- (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.



TO: PATUXENT PUBLISHING COMPANY  
Thursday, August 9, 2001 Issue – Jeffersonian

*Sue*

*Could be duplicate*

Please forward billing to:  
Edward D Randall  
16 Alderman Court  
Timonium MD 21093

410 823-8294

*George*

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## NOTICE OF ZONING HEARING

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

CASE NUMBER: 01-532-SPH  
14 Willow Avenue  
S/S Willow Avenue, 183' E York Road  
9<sup>th</sup> Election District – 4<sup>th</sup> Councilmanic District  
Legal Owners: Evelyn B & Edward O Randall Jr

Special Hearing to approve existing non-conforming use service garage & general (non-medical) offices located in a R.O. (Residential-Office zone).

HEARING: Friday, August 24, 2001 at 9:00 a.m. In Room 407, County Courts Building, 401 Bosley Avenue

  
Lawrence E. Schmidt

LAWRENCE E. SCHMIDT *GDZ*  
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  
Department of Permits and  
Development Management

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

July 25, 2001

## NOTICE OF ZONING HEARING

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

CASE NUMBER: 01-532-SPH  
14 Willow Avenue  
S/S Willow Avenue, 183' E York Road  
9<sup>th</sup> Election District – 4<sup>th</sup> Councilmanic District  
Legal Owners: Evelyn B & Edward O Randall Jr

Special Hearing to approve existing non-conforming use service garage & general (non-medical) offices located in a R.O. (Residential-Office zone).

HEARING: Friday, August 24, 2001 at 9:00 a.m. In Room 407, County Courts Building, 401 Bosley Avenue

A handwritten signature in cursive script, appearing to read "Arnold Jablon".

Arnold Jablon GDZ  
Director

C: Edward C Covahey Jr, Covahey & Boozer PA, 614 Bosley Avenue, Towson 21204  
Evelyn B & Edward O Randall Jr, 16 Alderman Court, Lutherville 21093

- NOTES: (1) **THE PETITIONER MUST HAVE THE ZONING NOTICE SIGN POSTED BY AN APPROVED POSTER ON THE PROPERTY BY THURSDAY, AUGUST 9, 2001.**
- (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.

TO: PATUXENT PUBLISHING COMPANY  
Thursday, August 23, 2001 Issue – Jeffersonian

Please forward billing to:

Edward D Randall  
16 Alderman Court  
Timonium MD 21093

410 823-8294

---

## NOTICE OF ZONING HEARING

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

CASE NUMBER: 01-532-SPH

14 Willow Avenue

S/S Willow Avenue, 183' E York Road

9<sup>th</sup> Election District – 4<sup>th</sup> Councilmanic District

Legal Owners: Evelyn B & Edward O Randall Jr

Special Hearing to approve existing non-conforming use service garage & general (non-medical) offices located in a R.O. (Residential-Office zone).

HEARING: Monday, September 10, 2001 at 11:00 a.m. In Room 407, County Courts Building, 401 Bosley Avenue



Lawrence E. Schmidt

LAWRENCE E. SCHMIDT GDZ  
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  
Department of Permits and  
Development Management

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

August 9, 2001

## NOTICE OF ZONING HEARING

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

CASE NUMBER: 01-532-SPH  
14 Willow Avenue  
S/S Willow Avenue, 183' E York Road  
9<sup>th</sup> Election District – 4<sup>th</sup> Councilmanic District  
Legal Owners: Evelyn B & Edward O Randall Jr

Special Hearing to approve existing non-conforming use service garage & general (non-medical) offices located in a R.O. (Residential-Office zone).

HEARING: Monday, September 10, 2001 at 11:00 a.m. In Room 407, County Courts Building, 401 Bosley Avenue

A handwritten signature in cursive script that reads "Arnold Jablon".

Arnold Jablon GDZ  
Director

C: Edward C Covahey Jr, Covahey & Boozer PA, 614 Bosley Avenue, Towson 21204  
Evelyn B & Edward O Randall Jr, 16 Alderman Court, Lutherville 21093

- NOTES: (1) **THE PETITIONER MUST HAVE THE ZONING NOTICE SIGN POSTED BY AN APPROVED POSTER ON THE PROPERTY BY SATURDAY, AUGUST 25, 2001.**
- (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.

TO: PATUXENT PUBLISHING COMPANY  
Tuesday, January 29, 2002 Issue – Jeffersonian

Please forward billing to:  
Edward D Randall  
16 Alderman Court  
Timonium MD 21093

410 823-8294

---

## NOTICE OF ZONING HEARING

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

CASE NUMBER: 01-532-SPH  
14 Willow Avenue  
S/S Willow Avenue, 183' E York Road  
9<sup>th</sup> Election District – 4<sup>th</sup> Councilmanic District  
Legal Owners: Evelyn B & Edward O Randall Jr

Special Hearing to approve existing non-conforming use service garage & general (non-medical) offices located in a R.O. (Residential-Office zone).

HEARING: Wednesday, February 13, 2002 at 2:00 p.m. in Room 407, County Courts Building, 401 Bosley Avenue



Lawrence E. Schmidt

LAWRENCE E. SCHMIDT  
ZONING COMMISSIONER FOR BALTIMORE COUNTY

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



Baltimore County  
Department of Permits and  
Development Management

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

January 17, 2001

## NOTICE OF ZONING HEARING

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

CASE NUMBER: 01-532-SPH  
14 Willow Avenue  
S/S Willow Avenue, 183' E York Road  
9<sup>th</sup> Election District – 4<sup>th</sup> Councilmanic District  
Legal Owners: Evelyn B & Edward O Randall Jr

Special Hearing to approve existing non-conforming use service garage & general (non-medical) offices located in a R.O. (Residential-Office zone).

HEARING: Wednesday, February 13, 2002 at 2:00 p.m. in Room 407, County Courts Building, 401 Bosley Avenue

A handwritten signature in cursive script, appearing to read "Arnold Jablon".

Arnold Jablon G.D.Z.  
Director

C. Edward C Covahey Jr, Covahey & Boozer PA, 614 Bosley Avenue, Towson 21204  
Evelyn B & Edward O Randall Jr, 16 Alderman Court, Lutherville 21093  
Stacey Weiss, 220 E Susquehanna Avenue, Towson 21286

- NOTES: (1) **THE PETITIONER MUST HAVE THE ZONING NOTICE SIGN POSTED BY AN APPROVED POSTER ON THE PROPERTY BY TUESDAY, JANUARY 29, 2002.**
- (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.



Baltimore County  
Department of Permits and  
Development Management

Development Processing  
County Office Building  
111 West Chesapeake Avenue  
Towson, Maryland 21204  
pdmlandacq@co.ba.md.us

February 8, 2002

Edward C Covahey Jr  
Covahey & Boozer PA  
614 Bosley Avenue  
Towson MD 21204

Dear Mr. Covahey:

RE: Case Number: 01-532-SPH, 14 Willow Avenue

The above referenced petition was accepted for processing by the Bureau of Zoning Review, Department of Permits and Development Management (PDM) on June 19, 2001.

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 cursive script that reads "W. Carl Richards, Jr.".

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

WCR: gdz

Enclosures

c: Edward O & Evelyn B Randall, 16 Alderman Court, Lutherville 21093  
Stacey Weiss, 220 E Susquehanna Avenue, Towson 21286  
People's Counsel

Come visit the County's Website at [www.co.ba.md.us](http://www.co.ba.md.us)



*John Alexander*

*SPR PP  
9/29/01  
RS  
RANDALL PP*

**BALTIMORE COUNTY, MARYLAND  
INTEROFFICE CORRESPONDENCE**

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

**DATE:** August 2, 2001

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

**SUBJECT:** Zoning Advisory Committee Meeting  
For July 23, 2001  
Item Nos. 485, 527, 528, 529, 530, 532,  
534, 536, 537, 540, 541, 542, 543, 544,  
546, 547, 548, 549, and 550

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

RWB:HJO:jrb

cc: File





Baltimore County  
Fire Department

700 East Joppa Road  
Towson, Maryland 21286-5500  
410-887-4500

July 24, 2001

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

ATTENTION: Gwen Stephens

RE: Property Owner: SEE BELOW

Location: DISTRIBUTION MEETING OF July 16, 2001

Item No.: 485, 526, 530, 532, 537, 544, 546, 547, 549

Dear Ms. Stephens:

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

4. The site shall be made to comply with all applicable parts of the Fire Prevention Code prior to occupancy or beginning of operation.
5. The buildings and structures existing or proposed on the site shall comply with all applicable requirements of the National Fire Protection Association Standard No. 101 "Life Safety Code", 1994 edition prior to occupancy.

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

cc: File

Come visit the County's Website at [www.co.ba.md.us](http://www.co.ba.md.us)



Yes  
8/24 P.P.

# BALTIMORE COUNTY, MARYLAND

## INTER-OFFICE CORRESPONDENCE

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

**DATE:** August 1, 2001

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

**SUBJECT:** 14 Willow Avenue

**INFORMATION:**

**Item Number:** 01-532

**Petitioner:** Edward O. Randall, Jr.

**Zoning:** RO

**Requested Action:** Special Hearing

**SUMMARY OF RECOMMENDATIONS:**

Based on a site visit, it appears that the existing non-conforming use has expanded and the existing lot can no longer accommodate the service garage. Repaired and/or vehicles awaiting repair are being parked on the street in the residential neighborhood occupying spaces that are supposed to be used by the area residents (permit parking). This office is of the opinion that the service garage, general offices and taxi parking area (Jimmy's Cab Service) and/or taxi dispatch, which are **not** approved non-conforming uses, are directly contributing to the parking problem within the community and should be discontinued. Additionally, the Office of Planning, recommends that the owner make arrangements with adjacent commercial property owners to use/rent or lease additional parking spaces in order to mitigate/abate the current parking problem.

Prepared by: Maeb A. Curren

Section Chief: Gary Keller  
AFK:MAC:



Maryland Department of Transportation  
State Highway Administration

Parris N. Glendening  
Governor

John D. Porcari  
Secretary

Parker F. Williams  
Administrator

*Les 9/1/01*

Date: 7.23.01

Ms. Ronnay Jackson  
Baltimore County Office of  
Permits and Development Management  
County Office Building, Room 109  
Towson, Maryland 21204

RE: Baltimore County  
Item No. 532

JNP

Dear Ms. Jackson:

This office has reviewed the referenced item and we have no objection to approval as it does not access a State roadway and is not affected by any State Highway Administration projects.

Should you have any questions regarding this matter, please contact Larry Gredlein at 410-545-5606 or by E-mail at (lgredlein@sha.state.md.us).

Very truly yours,

*for*

Kenneth A. McDonald Jr., Chief  
Engineering Access Permits Division

My telephone number is \_\_\_\_\_

Maryland Relay Service for Impaired Hearing or Speech  
1-800-735-2258 Statewide Toll Free

Mailing Address: P.O. Box 717 • Baltimore, MD 21203-0717  
Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

RE: PETITION FOR SPECIAL HEARING  
14 Willow Avenue, S/S Willow Ave,  
183' E of York Rd  
9th Election District, 4th Councilmanic

Legal Owner: Edward O. & Evelyn B. Randall, Jr.  
Petitioner(s)

\* BEFORE THE  
\* ZONING COMMISSIONER  
\* FOR  
\* BALTIMORE COUNTY  
\* Case No. 01-532-SPH

\* \* \* \* \*

**ENTRY OF APPEARANCE**

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



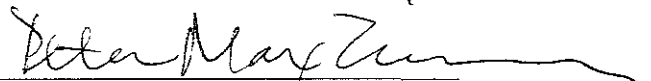
PETER MAX ZIMMERMAN  
People's Counsel for Baltimore County



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

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 7th day of August, 2001 a copy of the foregoing Entry of Appearance was mailed to Edward C. Covahey, Jr., Esq., Covahey & Boozer, 614 Bosley Avenue, Towson, MD 21204, attorney for Petitioner(s).



PETER MAX ZIMMERMAN

# NOTE TO FILE

DATE: June 19, 2001  
TO: Zoning Commissioner  
FROM: Jeffrey Perlow, Planner II  
Zoning Review  
RE: 01-532-SPH (14 Willow Avenue)  
Edward D. Randall & Evelyn B. Randall- Petitioners

Petitioner, petitioner's engineer and petitioner's attorney were advised of the following concerns regarding the petitions and site plans as submitted:

Since no floor plan was submitted delineating the floor areas and square footages of the various uses within the building, it was strongly advised that a floor plan be submitted at the time of the hearing. However, this office believes that the Special Hearing relief being requested is appropriate and takes no issue with the specifics of the request.

Based on the above, we accepted the petitions and site plans for filing (without a floor plan) at the insistence of the petitioner, the petitioner's engineer and the petitioner's attorney.



Baltimore County  
Department of Permits and  
Development Management

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

August 14, 2001

Edward C Covahey Jr  
Covahey & Boozer PA  
614 Bosley Avenue  
Towson MD 21204

Dear Mr. Covahey:

RE: Case Number 01-532-SPH: 14 Willow Avenue

The above matter, previously scheduled for Monday, September 10, 2001 at 11:00 a.m. in Room 407, County Courts Building, has been postponed at the request of Stacy Weiss, President, Towson Manor Village Community Associates Inc. Once the hearing has been rescheduled you will be notified by mail.

Please be advised that, as the individual requesting and receiving the postponement, the responsibility and costs associated with the appropriate posting of the property now lies with you. The petitioner or his/her agent may not personally post or change a zoning sign. One of the currently approved vendors/posters must be contacted to do so. If the property has been posted with notice of the original hearing date, as quickly as possible a notice of the new hearing date should be affixed to the sign(s).

Very truly yours,

A handwritten signature in cursive script, appearing to read "Arnold Jablon".

Arnold Jablon GDZ  
Director

AJ: gdz

C: Evelyn B & Edward O Randall Jr, 16 Alderman Court, Lutherville 21093  
Stacey Weiss, 220 E Susquehanna Avenue, Towson 21286



County Board of Appeals of Baltimore County

OLD COURTHOUSE, ROOM 49  
400 WASHINGTON AVENUE  
TOWSON, MARYLAND 21204  
410-887-3180  
FAX: 410-887-3182

AUG 24 2001

August 23, 2001

Edward C. Covahey, Jr., Esquire  
COVAHEY & BOOZER, P.A.  
614 Bosley Avenue  
Towson, MD 21204

C. Robert Loskot  
Assistant County Attorney  
Second Floor, Old Courthouse  
Towson, MD 21204

RE: *In the Matter of: Edward O. Randall, Jr. and Evelyn B. Randall*  
Case No. CBA-01-133 /Civil Citation # 01-0451

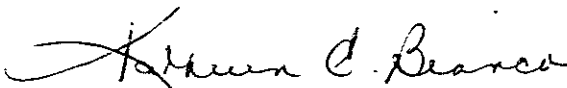
Dear Counsel:

This letter will confirm the grant of Mr. Covahey's request for postponement of the subject matter from the scheduled September 6<sup>th</sup> hearing date, to be reset for hearing upon conclusion of Case No. 01-532-SPH before the Zoning Commissioner.

In addition, by copy of this letter, the Board requests that the Zoning Commissioner, at the conclusion of Case No. 01-532-SPH, provide a copy of his final decision to the Board and all parties to this matter. At that time, further action will then be taken by this office relative to Case No. CBA-01-133.

Attached for your file and information is a copy of the Notice of Postponement issued this date. Should you have any questions, please call me at 410-887-3180.

Very truly yours,

  
Kathleen C. Bianco  
Administrator

c: Lawrence E. Schmidt /Zoning Commissioner  
Lavette Street /Code Enforcement Inspector /CC#01-0451  
Arnold Jablon, Director /PDM



County Board of Appeals of Baltimore County

OLD COURTHOUSE, ROOM 49
400 WASHINGTON AVENUE
TOWSON, MARYLAND 21204
410-887-3180
FAX: 410-887-3182

Hearing Room - Room 48
Old Courthouse, 400 Washington Avenue

August 23, 2001

NOTICE OF POSTPONEMENT

CASE #: CBA-01-133
/ CC-01-0451

IN THE MATTER OF: Evelyn B. and Edward O. Randall, Jr.
Legal Owners / Defendants 14 Willow Avenue (Towson, MD)

Code Inspections and Enforcement Violation / (BCC Section 1-7)

which was scheduled for hearing on 9/06/01 has been POSTPONED by request of counsel for appellant, without objection by Baltimore County.

To be reset for hearing upon conclusion of hearing (Case No. 01-532-SPH) before the Zoning Commissioner and issuance of his final decision.

NOTICE: 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). For further information, see Board's Rules of Practice & Procedure, Appendix C, Baltimore County Code.

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

Kathleen C. Bianco
Administrator

cc: Counsel for Appellant / Legal Owner
Appellant / Legal Owner

: Edward C. Covahey, Jr., Esquire
: Evelyn B. and Edward O. Randall, Jr.

Jimmy's Cab Association, Inc. /14 Willow Avenue
R. Rubin, Inc.
Leo Maenner /14 Willow Avenue

Marlen Williamson Blair Melvin
Bob Lake Ellen Burton
Beth Clifford Stacy Weiss
Claudia Blaize Donald Gerding

Stanley J. Schapiro, Code Official /Hearing Officer
Lavette Street /Code Enforcement Inspector MS 1105
Arnold Jablon, Director /PDM
C. Robert Loskot, Assistant County Attorney

COPY - Lawrence Schmidt



COVAHEY & BOOZER, P. A.

ATTORNEYS AT LAW

614 BOSLEY AVENUE

TOWSON, MARYLAND 21204

AREA CODE 410

828-9441

FAX 410-823-7530

*8/22/01  
George - see me  
cj*

EDWARD C. COVAHEY, JR.

F. VERNON BOOZER \*

MARK S. DEVAN

THOMAS P. DORE

MICHAEL T. PATE

STACIE D. TRAGESER

ANNEX OFFICE

SUITE 302

606 BALTIMORE AVE.

TOWSON, MD 21204

\* ALSO ADMITTED TO D. C. BAR

August 21, 2001

Arnold Jablon, Director  
Baltimore County  
Department of Permits and  
Development Management  
111 W. Chesapeake Avenue  
Towson, Maryland 21204

Re: Case Number 01-532 SPH: 14 Willow Avenue

Dear Mr. Jablon:

This is to acknowledge receipt of your letter dated August 14, 2001 re: the above-captioned postponement which was requested by the Towson Manor Village Community Association, Inc. I note this is the second postponement granted to Towson Manor Village Community Association, Inc.

In connection with rescheduling same, because of potential court conflicts, I would request that the undersigned be contacted with respect to hearing dates that do not otherwise conflict with my schedule.

*OK*

Next, addressing your letter to me, you state that, ". . . as the individual requesting and receiving the postponement, the responsibility and costs associated with the appropriate posting of the property now lies with you." Again, the Petitioners did not request the postponement. Please contact me as to the responsibility for causing the property to be posted.

*prop  
need to  
have  
posted*

Also, the Towson Manor Village Community Association has never had the courtesy to forward copies of any postponement requests to the undersigned or the applicants, and I would appreciate it if you would provide me with copies of the written postponement requests. Thank you.

*OK*

BEST.

Very truly yours,



Edward C. Covahey, Jr.

0820ldr15

cc: Lawrence Schmidt, Zoning Commissioner  
Mr. & Mrs. Edward O. Randall, Jr.  
Ms. Stacey Weiss

COVAHEY & BOOZER, P. A.

ATTORNEYS AT LAW  
614 BOSLEY AVENUE  
TOWSON, MARYLAND 21204  
AREA CODE 410  
828-9441

EDWARD C. COVAHEY, JR.  
F. VERNON BOOZER \*  
MARK S. DEVAN  
THOMAS P. DORE  
MICHAEL T. PATE  
STACIE D. TRAGESER

FAX 410-823-7530

ANNEX OFFICE  
SUITE 302  
606 BALTIMORE AVE.  
TOWSON, MD 21204

\* ALSO ADMITTED TO D. C. BAR

August 21, 2001

County Board of Appeals  
of Baltimore County  
Old Courthouse, Room 49  
400 Washington Avenue  
Towson, Maryland 21204

AUG 21

Re: Case No. CBA-01-131/CC-01-0451  
In the Matter of Evelyn B. and Edward O. Randall, Jr.  
Legal Owners: 14 Willow Avenue, Towson, Maryland

(# 01-532-SPH)

Dear Sir/Madam:

Please treat this as a request that the above-captioned be postponed from its September 6, 2001 hearing date in that the above-captioned involves a non-conforming use and the extent of the non-conforming use.

Pursuant to the Code Enforcement Officer's Order of June 29, 2001, it was ordered that if the Respondents obtain a special hearing, then the civil penalty would be suspended. Pursuant to the Order, the Respondents have filed for special hearing before the Zoning Commissioner for Baltimore County (Case No. 01-532-SPH), which special hearing was originally set for August 24, 2001 prior to the September 6, 2001 hearing, was then rescheduled to September 10, 2001, and has for the second time, been postponed at the behest of Towson Manor Village Community Association, Inc.

In light of the history outlined above, it would appear that the instant case should not be conducted until the hearing before the Zoning Commissioner is resolved as it may adjudicate all the issues pending in the instant appeal.

Very truly yours,

  
Edward C. Covahey, Jr.

0820ldr16

cc: Lawrence Schmidt, Zoning Commissioner  
Arnold Jablon, Director  
Mr. & Mrs. Edward O. Randall, Jr.  
Ms. Stacey Weiss

COVAHEY & BOOZER, P. A.

ATTORNEYS AT LAW  
614 BOSLEY AVENUE  
TOWSON, MARYLAND 21204  
AREA CODE 410  
828-9441

EDWARD C. COVAHEY, JR.  
F. VERNON BOOZER \*  
MARK S. DEVAN  
THOMAS P. DORE  
MICHAEL T. PATE  
STACIE D. TRAGESER

FAX 410-823-7530

ANNEX OFFICE  
SUITE 302  
606 BALTIMORE AVE.  
TOWSON, MD 21204

\* ALSO ADMITTED TO D. C. BAR

August 21, 2001

Arnold Jablon, Director  
Baltimore County  
Department of Permits and  
Development Management  
111 W. Chesapeake Avenue  
Towson, Maryland 21204

*9-27-01*  
*Brendy -*  
*see link -*

Re: Case Number 01-532 SPH: 14 Willow Avenue

Dear Mr. Jablon:

This is to acknowledge receipt of your letter dated August 14, 2001 re: the above-captioned postponement which was requested by the Towson Manor Village Community Association, Inc. I note this is the second postponement granted to Towson Manor Village Community Association, Inc.

In connection with rescheduling same, because of potential court conflicts, I would request that the undersigned be contacted with respect to hearing dates that do not otherwise conflict with my schedule.

Next, addressing your letter to me, you state that, ". . . as the individual requesting and receiving the postponement, the responsibility and costs associated with the appropriate posting of the property now lies with you." Again, the Petitioners did not request the postponement. Please contact me as to the responsibility for causing the property to be posted.

Also, the Towson Manor Village Community Association has never had the courtesy to forward copies of any postponement requests to the undersigned or the applicants, and I would appreciate it if you would provide me with copies of the written postponement requests. Thank you.

BEST.

Very truly yours,

Edward C. Covahey, Jr.

0820ldr15

cc: Lawrence Schmidt, Zoning Commissioner  
Mr. & Mrs. Edward O. Randall, Jr.  
Ms. Stacey Weiss

Towson Manor Village Community Assoc, Inc.

8/8/01  
8  
Gleay - OK  
to R  
August 6, 2001

Arnold Jablon, Esq. Director  
Director Of Permits and Development Management  
County Office Building  
111 West Chesapeake Avenue  
Towson, MD 21204

Dear Mr. Jablon:

By this memorandum I am requesting a postponement of case #01-532 SPH, presently scheduled for hearing on August 24, 2001 at 9:00a.m.

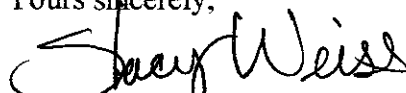
I respectfully request a postponement until after the appeal of the original case (#01-0451) has been heard by the Board of Appeals on September 6<sup>th</sup> in case #CBA-01-133 and a decision has been rendered. The Special Hearing for a nonconforming use was the issue in the original case before the Hearing Officer.

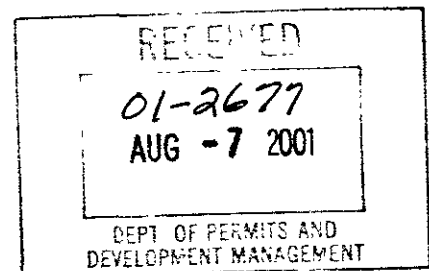
The chronology was as follows:

- a) Case #01-0451- a correction notice was issued on March 3, 2001, stating that Current zoning laws do not permit the use of the property as a service garage.
- b) A citation was issued on May 9,2001, for failure to comply with the correction notice.
- c) The Hearing Officer, Stanley Shapiro heard the case on June 20, 2001.
- d) Mr. Shapiro's FINDINGS OF FACT AND CONCLUSIONS OF LAW, unfavorable to the owners of the subject property at 14 Willow Avenue, Edward O. and Evelyn B. Randall was issued on June 29, 2001.
- e) Owners of 14 Willow Avenue ( known as Leo's Body Shop) filed an appeal with the Board of Appeals from the Shapiro ruling in case # CBA-01-133, which is scheduled to be heard September 6, 2001.

To allow the hearing to go forward before the Zoning Commissioner on August 24<sup>th</sup> would seriously cloud the issue by virtue of the thirty day rule. The Zoning Commissioner's hearing should be postponed until after the Board of Appeals has reviewed the merits of the Hearing Officer's ruling on September 6, and rendered a decision.

Yours sincerely,

  
Stacy Weiss, President



220 East Susquehanna Avenue  
Towson MD, 21286  
410-321-6816



PLEASE PRINT LEGIBLY

**PROTESTANT'S SIGN-IN SHEET**

Name	Address	City, State	Zip Code
Stacy Weiss	220 E. Susquehanna Ave	Towson, MD	21286
Richard Parsons	412 Woodbine Ave	Towson md	21284
Constant George	112 Burke Ave	TOWSON MD	21288
Albert Blaize	47 Willow Ave	Towson, MD	21286
Kenneth B. Cronin	200-204 YORK RD <sup>KFC</sup>	TOWSON MD	21204
Betty M. Lake	28 Willow Ave	Towson, Md	21286
Douglas B. Riley	25 S. Charles Street	Suite 2115, Baltimore	21201
MARION WILLIAMS	32 WILLOW AVE	TOWSON MD	21286
ELIZABETH CLIFFORD	32 Willow Ave	Towson, MD	21286
MARGARET Muhl	212 WILSON DR	Towson, MD	21286

BALTIMORE COUNTY, MARYLAND  
INTEROFFICE CORRESPONDENCE

DATE: August 3, 2001

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

FROM: Rick Wisnom, Chief  
Division of Code Inspections & Enforcement

SUBJECT: Item No.: 532 (01-532SPH)  
Legal Owner/Petitioner: Evelyn B. and Edward O. Randall  
Property Address: 14 Willow Avenue  
Location Description: S/S Willow Avenue, 183' E York Road

VIOLATION INFORMATION: **Case No.: 01-0451**  
Defendants: Evelyn B. and Edward O. Randall

Please be advised that the aforementioned petition is the subject of an active violation case. **When the petition is scheduled for a public hearing, please notify the following person(s) regarding the hearing date:**

NAME	ADDRESS
<b>Stacy Weiss</b>	<b>220 East Susquehanna Avenue Towson, Maryland 21286</b>

In addition, please find attached a duplicate copy of the pertinent documents relative to the violation case, for review by the Zoning Commissioner's Office.

After the public hearing is held, please send a copy of the Zoning Commissioner's order to Helene Kehring in Room 113 in order that the appropriate action may be taken relative to the violation case.

RSW/hek  
C: Code Enforcement Officer Lavette Street





Baltimore County  
Department of Permits and  
Development Management

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

July 26, 2001

C. Robert Loskot, Esquire  
Baltimore County Law Office  
400 Washington Avenue  
Towson, MD 21204

Dear Mr. Loskot:

RE: *In the Matter of Civil Citation No. 01-0451, 14 Willow Avenue*

Please be advised that an appeal of the above-referenced matter was filed in this office on July 13, 2001 by Edward C. Covahey, Jr., Esquire. All relative materials will be forwarded to the Baltimore County Board of Appeals.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Arnold Jablon".

Arnold Jablon  
Director

AJ:kp

c: Edward Gillis, Esquire, Baltimore County Law Office, MS 2209 ✓  
Stanley J. Schapiro, Code Enforcement Hearing Official  
Lavette Street, Inspector  
Mr. & Mrs. Edward O Randall, 16 Alderman Court, Lutherville, Md. 21093  
Edward C. Covahey, Jr., Esquire, 614 Bosley Avenue, Towson, Md. 21204



County Board of Appeals of Baltimore County

7/20/01  
JT  
f

OLD COURTHOUSE, ROOM 49  
400 WASHINGTON AVENUE  
TOWSON, MARYLAND 21204  
410-887-3180  
FAX: 410-887-3182

Hearing Room - Room 48  
Old Courthouse, 400 Washington Avenue

July 17, 2001

NOTICE OF ASSIGNMENT

CASE #: CBA-01-131  
/ CC-01-0451

IN THE MATTER OF: *Evelyn B. and Edward O. Randall, Jr.*  
Legal Owners / Defendants 14 Willow Avenue (Towson, MD);

Code Inspections and Enforcement Violation / (BCC Section 1-7)

ASSIGNED FOR: THURSDAY, SEPTEMBER 6, 2001 at 9:00 a.m.

NOTICE: 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). For further information, see Board's Rules of Practice & Procedure, Appendix C, Baltimore County Code.

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

Kathleen C. Bianco  
Administrator

cc: Counsel for Appellant /Legal Owner  
Appellant /Legal Owner

: Edward C. Covahey, Jr., Esquire  
: Evelyn B. and Edward O. Randall, Jr.

Jimmy's Cab Association, Inc. /14 Willow Avenue  
R. Rubin, Inc.  
Leo Maenner /14 Willow Avenue

Marlen Williamson Blair Melvin  
Bob Lake Ellen Burton  
Beth Clifford Stacy Weiss  
Claudia Blaize

Stanley J. Schapiro, Code Official /Hearing Officer  
Lavette Street /Code Enforcement Inspector MS 1105 *given 7/23/01*  
Arnold Jablon, Director /PDM  
C. Robert Loskot, Assistant County Attorney

JUL 19 2001

## APPEAL

Code Inspections and Enforcement Violation  
14 Willow Avenue  
9<sup>th</sup> Election District – 5<sup>th</sup> Councilmanic District  
Mr. & Mrs. Edward O. Randall - Legal Owner/Defendant  
Civil Citation Number 01-0451

Code Enforcement Report, original date of February 2, 2001

Code Enforcement Daily Worksheet dated February 2, 2001

State Tax Assessment Printout, two pages, dated March 2, 2001

Correction Notice, issued March 5, 2001 (Plaintiff's Exhibit 1)

Letter to Mr. & Mrs. Edward O. Randall from James H. Thompson, Code Inspections and Enforcement Supervisor, dated March 13, 2001, (Plaintiff's Exhibit 3)

Proof of Service for Edward C. Covahey, Jr. Esquire, dated April 24, 2001

Citation to Edward C. Covahey, Jr. Esquire, No. 01-0451, dated June 20, 2001 (Plaintiff's Exhibit 2)

### Plaintiff's Exhibits:

- 1 Correction Notice, issued March 5, 2001
- 2 Citation, issued April 24, 2001
- 3 Letter to Mr. & Mrs. Randall, from James H. Thompson dated March 13, 2001

### Respondent's Exhibit:

- 1 Order of Dismissal from Zoning Commissioner, dated April 25, 1978
- 1A Zoning plans from Office of Planning and Zoning, dated December 1, 1980
- 2 Plan to Accompany Petition for Special Hearing for 14 Willow Avenue, dated May 21, 2001

### Complainant's Exhibit

- 1 Copies of permit/equipment service sheets dated February 2000 through March 2001
- 2 Memo to Patricia Schoff from Clarence Callahan, dated June 15, 2001
- 3 Letter from Captain Weih to Ms. Stacy Weiss, dated June 13, 2001 with attached copy of service calls to Willow Avenue

Tape Recording of Hearing held on June 20, 2001

Final Order of the Code Enforcement Hearing Officer, dated June 29, 2001

Cover Letter, Notice of Appeal, and Petition of Appeal from Edward C. Covahey, Jr., Esquire on behalf of Edward O. Randall, Jr. and Evelyn B. Randall, dated and received July 13, 2001

list: C. Robert Loskot, Assistant County Attorney, MS 2209  
Edward Gillis, County Attorney, MS 2209  
Stanley J. Schapiro, Code Enforcement Hearing Official  
Lavette Street, Inspector  
Mr. & Mrs. Edward O. Randall, 16 Alderman Court, Lutherville, Md. 21093  
Edward C. Covahey, Jr., Esquire, 614 Bosley Avenue, Towson, Md. 21204

DATE: 2/2, 01 INTAKE BY: HJ CASE #: INSPEC: 14

COMPLAINANT LOCATION: 14 WILLOW AVE (LEO'S GARAGE)  
TOWSON MD ZIP CODE: 21286 DIST:

COMPLAINANT NAME: WALK-IN PHONE #: (H) (W)

ADDRESS: ZIP CODE:

PROBLEM: This is supposed to be a repair garage. There is a cab company being run out of this garage which has their own office within the garage.

IS THIS A RENTAL UNIT? YES NO  
IF YES, IS THIS SECTION 8? YES NO  
OWNER/TENANT INFORMATION:

TAX ACCOUNT #: 143086055 & 143086640 ZONING:

INSPECTION: 02/05/01 - See Daily worksheet

Towson Manor Village PA

REINSPECTION: 02/15/01

REINSPECTION:

REINSPECTION:

Inspector - \_\_\_\_\_

Area	Case #	Location	Apt	Zip	Date Rec	Reinsp Dt
014	01-0451	14 WILLOW AVE		21286	2/02/2001	5/09/2001

Tax Acct #: 1413086055

Complainant Name: (Last) WALK IN (First)

Addr:

Str #	Dir	Street Name	Type	Apt
-------	-----	-------------	------	-----

City	ST	Zip
------	----	-----

Phone: (Home)	(Work)
---------------	--------

Problem: SUPPOSED TO BE A REPAIR GARAGE, THERE IS A CAB COMPANY BEING RUN OUT OF THIS GARAGE WHICH HAS THEIR OWN OFFICE WITHIN THE GARAGE; 2ND TAX ACCT NUMBER 1413086640

## Notes:

2/5/01, RO ZONING; ISSUED NOTICE, 2/5/01, SPOKE W/OWNER, THE Y WORK ON CABS, NO DISPATCHING FROM 14 WILLOW, NO EVIDENCE WHILE I WAS THERE, SPECIAL HEARING - GRANTED 10/28/1977, L BANNERMAN.

\*\*CASE RE-OPENED. BY 4/19/01 EITHER CEASE ALL SERVICE GARAGE ACTIVITIES OR FILE FOR A NON-CONFORMING USE HEARING. THIS ACTION IS BEING TAKEN PER DIRECTIVE OF ARNOLD JABLON. (JHT) \*\*\*\*\*

\*\*\* 4/20/01 NEED TO CHECK W/ (JUT). HE'S, NOT6 IN TODAY. P/U 4/23/01 (L.B)

\*\*4/24/01-CITATION ISSUED. HEARING DATE 6/20/01. POP-UP 5/9/01 TO CHECK FOR SERVICE. CITATION SERVED ON EDWARD COVAHEY, ESQUIRE. (LB/SCJ)

DATE: 03/02/2001  
TIME: 12:09:54

ASSESSMENT TAXPAYER SERVICE

RA1001F

PROPERTY NO. DIST GROUP CLASS OCC. HIST DEL LOAD DATE  
09 13 203202 09 2-3 06-00 N NO 01/08/01

WILLOW ASSOCIATES  
DESC-1.. IMPS\*  
DESC-2.. 210FT E OF YORK RD  
16 WILLOW AV PREMISE. 00000 WILLOW AVE  
00000-0000

BALTIMORE MD 21286-0000 FORMER OWNER: MARZULLO DOMINIC J

-----FCV-----		-----TRANSFER DATA-----		---PROPERTY ID---	
LAND:	PRIOR 214,670	PROPOSED 169,600	NUMBER..... 93094	LOT.....	
IMPV:	295,100	284,000	DATE..... 11/21/84	BLOCK....	
TOTL:	509,770	453,600	PURCHASE PRICE.. 170,000	SECTION..	
PREF:	0	0	GROUND RENT..... 0	PLAT.....	
CURT:	0	0	DEED REF LIBR.. 06820	BOOK..... 0000	
DATE:	08/95	10/98	DEED REF FOLIO.. 303	FOLIO.... 0000	
			YEAR BUILT.....	MAP..... 0070	
			NEW CONSTR YR...	GRID..... 0014	
				PARCEL... 0670	
TAXABLE BASIS					
01/02	453,600	LOT WIDTH.. 40.00		SB	.00
00/01	181,440	LOT DEPTH.. .00		WB	.00
99/00	181,440	LAND AREA.. 17336.000 S		SS	108.36
ENTER-INQUIRY1	PAL-PRINT	PF4-MENU	PF5-QUIT	WD	51.75

16 Willow  
Ave.

DATE: 03/02/2001

STANDARD ASSESSMENT INQUIRY (2)

TIME: 12:10:14

PROPERTY NO.	DIST	GROUP	CLASS	OCC.	HISTORIC	DEL	LOAD DATE
09 13 203202	09	2-3	06-00	N	NO		01/08/01
LOT....	BOOK....	0000	MAP.....	0070	LOT WIDTH.....	40.00	
BLOCK..	FOLIO...	0000	GRID....	0014	LOT DEPTH.....	.00	
SECTION..			PARCEL..	0670	LAND AREA..	17336.000	S
PLAT..					YEAR BUILT.....	00	

-----TRANSFER DATA-----

NUMBER..... 093094  
 DATE..... 11/21/84  
 PURCHASE PRICE..... 170,000  
 GROUND RENT..... 0  
 DEED REF LIBER..... 06820  
 DEED REF FOLIO..... 0303  
 CONVEYED IND..... 1  
 TOT-PART TRAN IND..... T  
 GRANTOR ACCT NO.. 09-13-203202

CRITICAL	NEW CONST	CARD
AREAS CODE	YEAR	NO
		13118

-----EXEMPT DATA-----

STATUS.....  
 CLASS CODE..... 000  
 STATE EXEMPT CODE..... 000  
 COUNTY EXEMPT CODE..... 000  
 CURR STATE EX ASMT.... 0  
 PRIOR STATE EX ASMT... 0  
 CURR COUNTY EX ASMT... 0  
 PRIOR COUNTY EX ASMT.. 0

-----STRUCTURE-----

CODE	SQ. FEET
	4294

ENTER-INQUIRY3 PA1-PRINT PF2-INQUIRY1 PF4-MENU PF5-QUIT PF7-CROSS REF



Baltimore County  
Department of Permits and  
Development Management

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

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

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

BALTIMORE COUNTY UNIFORM CODE ENFORCEMENT CORRECTION NOTICE

Citation/Case No. 01-0451	Property No. 09-11-155890	Zoning RO
Name(s):	Edward O. Randall Evelyn B. Randall	
Address:	16 Alderman Court Lutherville MD. 21093	
Violation Location:	14 Willow Avenue	

DID UNLAWFULLY VIOLATE THE FOLLOWING BALTIMORE COUNTY LAWS:  
CURRENT ZONING FAILS TO PERMIT THE USE  
OF THE PROPERTY FOR A SERVICE GARAGE.  
THEREFORE, BY THE COMPLIANCE  
DATE EITHER CEASE ALL SUCH ACTIVITIES  
ALONG WITH REMOVING ALL UNLICENSED/  
IMPERMATIVE MOTOR VEHICLES OR FILE  
FOR A SPECIAL HEARING TO ESTABLISH  
A NON-CONFORMING USE. THIS  
NOTICE ALSO APPLIES TO ALL ACTIVITIES  
ASSOCIATED WITH THE CAB  
OPERATION.  
IF ADDITIONAL QUESTIONS REMAIN,  
PLEASE CONTACT OUR OFFICE.  
101.102.1, 204.3A, 204.3B BCZR

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

On or Before: 4-19-01	Date Issued: 3-5-01
--------------------------	------------------------

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

Print Name: LAVETTE BANNERMAN

INSPECTOR: Lavette Bannerman

STOP WORK NOTICE

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

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

INSPECTOR: \_\_\_\_\_

PLAINTIFF'S EXHIBIT /

AGENCY





Baltimore County  
 Department of Permits and  
 Development Management

Code Inspections and  
 Enforcement  
 County Office Building  
 111 West Chesapeake Avenue  
 Towson, Maryland 21204  
 pdmenforce@co.ba.md.us  
 pdminspect@co.ba.md.us

March 13, 2001

Mr. and Mrs. Edward O. Randall  
 16 Alderman Court  
 Lutherville, MD 21093

Dear Mr. and Mrs. Randall:

RE: Case Number 01-0451, 14 Willow Avenue

Please be advised that the records submitted to this department on March 12, 2001, concerning case number 78-108-V, have been reviewed by Director Arnold Jablon. While the prior Zoning Commissioner S. Eric DiNenna ultimately dismissed the zoning violation case, citing a nonconforming use for the service garage activities, this does not legally qualify this use under the law. One must file for a public hearing, wherein a sign is posted on the site of the alleged violation noting the time, place and subject matter of the special hearing petition to determine a nonconforming use. Therefore, the original correction notice of March 5, 2001 still is applicable in this case.

As always, if additional questions remain, please contact this office at 410-887-3351.

Sincerely,

James H. Thompson  
 Code Inspections and  
 Enforcement Supervisor

JHT:scj

c: Inspector Lavette Bannerman

PLAINTIFF'S EXHIBIT 3





County of \_\_\_\_\_  
 Department of Permits and  
 Development Management

Code Inspections and Enforcement  
 County Office Building  
 111 West Chesapeake Avenue  
 Towson, MD 21204  
 Plumbing Inspection: 410-887-3620  
 Electrical Inspection: 410-887-3960

**SERVE ON:** Edward C. Covakay, Jr., Esq., Towson, MD 21204  
 414 Bosley Ave

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

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

Citation/Case No. <b>01-0451</b>	Property No. <b>09-11-1558090</b>	Zoning: <b>R0</b>
Name(s): <b>Edward O. Randall</b> <b>Evelyn B. Randall</b>		
Address: <b>16 Alderman Ct., Lutherville, MD 21093</b>		
Violation Location: <b>14 Willow Ave -</b>		
Violation Dates: <b>03/05/01 THRU 04/24/01</b>		

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

**BCZR-101; 102.1; 204.3A; 204.3B; 408.1; 408.2; 1B01.1D**  
**Failure to cease the operation of a service garage.**  
**Failure to cease the operation of a junkyard by storing unlicensed / inoperative motor vehicles.**

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

\$ **20,000**

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

Date: **06/20/01**  
 Time: **9:00 AM**

Citation must be served by:

Date: **05/09/01**

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

Print Name: **LAVETTE BANNERMAN**

Date: **04/24/01** Inspector's Signature: **Lavette Bannerman**

SEE REVERSE SIDE FOR ADDITIONAL DETAILS AND INFORMATION

**NOTICE OF INTENTION TO DEFEND**

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

Address:

**PLAINTIFF'S EXHIBIT 2**

Date: \_\_\_\_\_ Defendant's Signature: \_\_\_\_\_

AGENCY



Baltimore County  
Department of Permits and  
Development Management

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

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

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

BALTIMORE COUNTY UNIFORM CODE ENFORCEMENT CORRECTION NOTICE

Citation/Case No. 01-0451	Property No. 09-11-155890	Zoning: RO
Name(s): Edward O. Randall Evelyn B. Randall	Address: 16 Alderman Court Lutherville MD. 21093	
Violation	Location: 14 Willow Avenue	

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THEREFORE, BY THE COMPLIANCE  
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ALONG WITH REMOVING ALL UNLICENSED/  
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FOR A SPECIAL HEARING TO ESTABLISH  
A NON-CONFORMING USE. THIS  
NOTICE ALSO APPLIES TO ALL ACTIVITIES  
ASSOCIATED WITH THE CAB  
OPERATION.

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101; 102.1; 204.3A; 204.3B BCZR

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Print Name: LAVETTE BANNERMAN

INSPECTOR: *Lavette Bannerman*

STOP WORK NOTICE

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

INSPECTOR:

PLAINTIFF'S EXHIBIT 1



Baltimore County  
 Department of Permits and  
 Development Management

Code Inspections and Enforcement  
 County Office Building

111 West Chesapeake Avenue  
 Towson, MD 21284 *1114 BOSLEY RD*

**SERVE ON:** Edward C. Covathey, Jr., Esq., Towson, MD 21284  
 Code Enforcement: 410-887-3351  
 Building Inspection: 410-887-3953

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

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

Citation/Case No. <b>01-0451</b>	Property No. <b>09-11-1558090</b>	Zoning: <b>R0</b>
-------------------------------------	--------------------------------------	----------------------

Name(s): **Edward O. Randall**  
**Evelyn B. Randall**

Address: **16 Alderman Ct., Lutherville, MD 21093**

Violation Location: **14 Willow Ave.**

Violation Dates: **03/05/01 THRU 04/24/01**

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

**BCZR-101; 102.1; 204.3A; 204.3B; 408.1; 408.2; 1B01.1D**

**Failure to cease the operation of a SERVICE GARAGE.**

**Failure to cease the operation of a JUNK YARD by storing unlicensed / inoperative motor vehicles.**

Pursuant to Section 1-8, Baltimore County Code, a civil penalty has been assessed, as a result of the violation cited herein, in the amount indicated: **\$ 20,000**

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**Time: 9:00 AM**

Citation must be served by: **Date: 05/09/01**

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

Print Name: **LAVETTE BANNERMAN**

Date: **04/24/01** Inspector's Signature: *Lavette Bannerman*

SEE REVERSE SIDE FOR ADDITIONAL DETAILS AND INFORMATION

**NOTICE OF INTENTION TO DEFEND**

Print Name: \_\_\_\_\_ Citation/Case No.: \_\_\_\_\_

Address: \_\_\_\_\_

**PLAINTIFF'S EXHIBIT 2**

Date: \_\_\_\_\_ Defendant's Signature: \_\_\_\_\_



Baltimore County  
 Department of Permits and  
 Development Management

Code Inspections and  
 Enforcement  
 County Office Building  
 111 West Chesapeake Avenue  
 Towson, Maryland 21204  
 pdmenforce@co.ba.md.us  
 pdminspect@co.ba.md.us

March 13, 2001

Mr. and Mrs. Edward O. Randall  
 16 Alderman Court  
 Lutherville, MD 21093

Dear Mr. and Mrs. Randall:

RE: Case Number 01-0451, 14 Willow Avenue

Please be advised that the records submitted to this department on March 12, 2001, concerning case number 78-108-V, have been reviewed by Director Arnold Jablon. While the prior Zoning Commissioner S. Eric DiNenna ultimately dismissed the zoning violation case, citing a nonconforming use for the service garage activities, this does not legally qualify this use under the law. One must file for a public hearing, wherein a sign is posted on the site of the alleged violation noting the time, place and subject matter of the special hearing petition to determine a nonconforming use. Therefore, the original correction notice of March 5, 2001 still is applicable in this case.

As always, if additional questions remain, please contact this office at 410-887-3351

Sincerely,

James H. Thompson  
 Code Inspections and  
 Enforcement Supervisor

JHT:scj

c: Inspector Lavette Bannerman

PLAINTIFF'S EXHIBIT 3

Census 2000

For You, For Baltimore County

Census 2000

Come visit the County's Website at [www.co.ba.md.us](http://www.co.ba.md.us)

RE: ZONING VIOLATION  
14 and 16 Willow Avenue  
9th Election District  
  
Mr. John Katsafanas  
14 Willow Avenue  
Towson, Maryland 21204  
Defendant  
  
Mr. D. J. Marjullo  
P. O. Box 6756  
Baltimore, Maryland 21204  
Defendant  
  
Mr. Christian C. Keckner  
10314 Greentop Road  
Cockeysville, Maryland 21030  
Defendant

BEFORE THE  
ZONING COMMISSIONER  
OF  
BALTIMORE COUNTY  
78-108-V, C-78-166  
Respondent's Exhibit 1

: : : : : : : : : : :

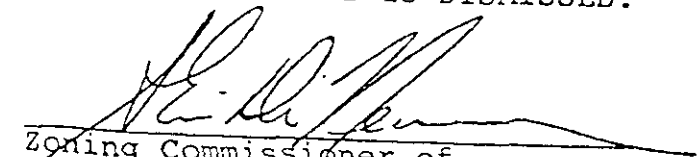
ORDER OF DISMISSAL

: : : : : : : : : :

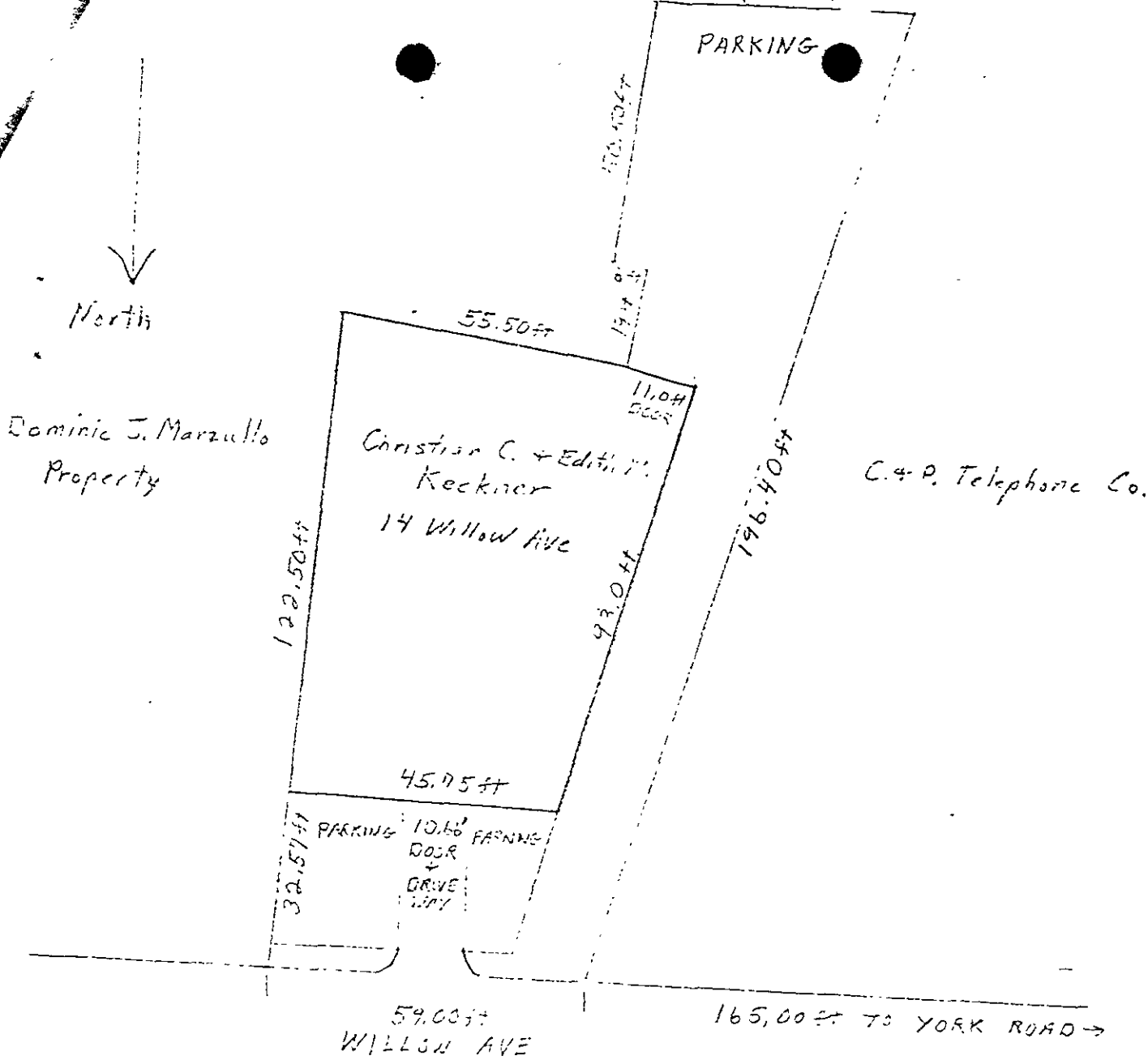
A complaint has been filed with the Zoning Office concerning an alleged violation of the Baltimore County Zoning Regulations at the above captioned location in Baltimore County.

14 Willow Road enjoys a legal nonconforming use for a service garage  
16 Willow Road operation of a business and service garage.

As there appeared no apparent violation of the Baltimore County Zoning Regulations at the present time, the matter is DISMISSED.

  
Zoning Commissioner of  
Baltimore County

Date: April 25, 1978



Existing Use: Repair & Service Garage

Existing Zoning: R.O.

Non-conforming use determined by case NO 78-108-V

No storage of unlicensed or inoperable vehicles outside.

Scale 1" = 30'

Respondent's Exhibit | A

OFFICE OF PLANNING & ZONING  
 James B. Byrnes  
 DATE: 12/1/80



COMMISSIONERS

STATE OF MARYLAND

CATHERINE I. RILEY  
CHAIRMAN

CLAUDE M. LIGON  
SUSANNE BROGAN  
J. JOSEPH CURRAN, III  
GAIL C. MCDONALD

GREGORY V. CARMEAN  
EXECUTIVE DIRECTOR



*Received  
4/17/01*

RICHARD P. PAGE  
DIRECTOR OF TRANSPORTATION

JOAN F. BAUER  
CLIFFORD J. WATTS  
Assistant Directors

PUBLIC SERVICE COMMISSION

TRANSPORTATION DIVISION

410-767-8013

April 16, 2001

Ms. Stacy Weiss  
220 E. Susquehanna Avenue  
Towson, MD 21286

Dear Ms. Weiss:

Per our conversation on April 13, 2001, attached are copies of equipment sheets that permit holders are required to submit to the Commission prior to placing a taxicab into service. As you can see, all of these permit/equipment holders operate at Jimmy's Cab Association, Inc. located at 14 Willow Avenue, Towson MD 21286.

If additional information is needed, please contact me at 410-767-8013.

Sincerely,

Clifford Watts  
Assistant Director, Safety

cc: Association File

*[Signature]*  
COMPLAINANT'S EXHIBIT 1

**PUBLIC SERVICE COMMISSION OF MARYLAND**  
**APPLICATION FOR PERMIT FOR THE OPERATION OF TAXICABS IN BALTIMORE COUNTY**  
 (This Form Must Be Typewritten)

*JL/M*

Date: JANUARY 19, 2001

Full Name of Permit Holder: COMPUTER CAB COMPANY INC.

Association Name & Address: JIMMY'S CAB ASSOCIATION, INC

14 WILLOW AVE TOWSON MD 21286

3. Identification of Applicant:

(a) If a corporation, list names and address of President, Secretary, and Resident Agent: PUBLIC SERVICE COMMISSION

(b) If a partnership, list name and address of all partners.

(c) If an individual, list name and address of individual.

MARK L. JOSEPH PRES 2100 HUNTINGDON AVE BALT. MD. 21211

JAN 24 2001

TERRANCE OATES SEC. 2100 HUNTINGDON AVE BALTIMORE MD. 21211

DEIDRA HELLWIG RESIDENT AGENT 2100 HUNTINGDON AVE BALTIMORE MD. 21211

**RECEIVED**  
 TRANSPORTATION  
 DIVISION

4. Mailing Address of Permit Holder: 2100 HUNTINGDON AVE BALTIMORE MD 21211

5. Telephone Number of Permit Holder: 410-727-7300

Check here if address or phone number has changed.

6. Name of Equipment Owner: MIDDLE RIVER TAXI INC.

*President: John Capecci*

7. Mailing Address Equipment Owner: 544 COMPASS RD.  
 BALTIMORE MD. 21220

8. Telephone Number of Equipment Owner: 410-391-0558

9. Evidence of Compliance With State Worker's Compensation Laws:  
 (check appropriate box)

Policy Binder Number: \_\_\_\_\_ OR  Have No Employed Drivers  
 Insurance Company: \_\_\_\_\_

TO BE COMPLETED BY APPLICANT

TO BE COMPLETED BY PSC

PERMIT NO.	MAKE	YEAR	VIN NO.	ISSUED	REMARKS
1302	OLDS	1995	1G3WH52M6SD369876	<i>1-26-01</i>	CHANGE OF EQUIPMENT/ PUBLIC SERVICE COMMISS
					<b>RECEIVED</b>
					<i>power</i> JAN 23 2001
<i>Outgoing 96 Ford 196790 - B Tag receipt dated 1-18-01</i>					
Returned PSC Medallion No:s <u>363 &amp; 364</u> Previous Permit No. _____					

TRANSPORTATION  
 DIVISION

I and/or we agree to comply with all city, county, state and federal ordinances, laws and/or statutes.

SIGN HERE: \_\_\_\_\_

*Richard Smith*

PUBLIC SERVICE COMMISSION OF MARYLAND

APPLICATION FOR PERMITS FOR THE OPERATION OF TAXICABS IN BALTIMORE COUNTY

(This Form Must Be Typewritten)

*3/2/2000 M.M.*

Date: 10 February, 2000

1. Full Name of Permit Holder: COMPUTER CAB COMPANY INC.
2. Association Name & Address: JIMMY'S CAB ASSOCIATION, INC  
14 WILLOW AVE TOWSON MD. 21286
3. Identification of Applicant:
  - (a) If a corporation, list names and address of President, Secretary, and Treasurer.
  - (b) If a partnership, list name and address of all partners.
  - (c) If an individual, list name and address of individual.

MARK I. JOSEPH PRES 2100 HUNTINGDON AVE BAL T MD. 21211  
TERANCE OATES SEC. 2100 HUNTINGDON AVE BALTIMORE MD. 21211  
DEIDRA HELLWIG RESIDENT AGENT 2100 HUNTINGDON AVE BALTIMORE MD. 21211
4. Mailing Address of Permit Holder: 2100 HUNTINGDON AVE BALTIMORE MD 21211
5. Telephone Number of Permit Holder: 410-727-7300
6. Name of Equipment Owner: KENNETH WILLIAM PROESHER Check here if address or phone number has changed. [ ]
7. Mailing Address of Equipment Owner: 8700 CIMMARON CIRCLE BALTIMORE MD. 21234
8. Telephone Number of Equipment Owner: 410-668-3513
9. Evidence of Compliance With State Worker's Compensation Laws:
  - (check appropriate box)
  - Policy or Binder Number: \_\_\_\_\_ OR  I Have No Employed Drivers
  - Insurance Company: \_\_\_\_\_

PUBLIC SERVICE COMMISSION  
**RECEIVED**

FEB 11 2000

TRANSPORTATION  
DIVISION

TO BE COMPLETED BY APPLICANT

TO BE COMPLETED BY PSC

PERMIT NO.	MAKE	YEAR	VIN NO.	ISSUED	REMARKS
1314	DODGE	1999	1B3EJ56H9XN607865	2/16/00	CHANGE OF EQUIP / HOLDER

Returned PSC Medallion No (if 92 chd 147447 outgoing reb. 1284129) Previous Permit No. \_\_\_\_\_

I and/or we agree to comply with all city, county, state and federal ordinances, laws and/or statutes.

SIGN HERE:

*Richard B. Smith*

PUBLIC SERVICE COMMISSION OF MARYLAND

APPLICATION FOR PERMITS FOR THE OPERATION OF TAXICABS IN BALTIMORE COUNTY  
(This Form Must Be Typewritten)

Date: 10 February 2000

PUBLIC SERVICE COMMISSION  
**RECEIVED**

1. Full Name of Permit Holder: COMPUTER CAB COMPANY INC.
2. Association Name & Address: JIMMY'S CAB ASSOCIATION, INC  
14 WILLOW AVE TOWSON MD. 21286
3. Identification of Applicant: TRANSPORTATION DIVISION  
 (a) If a corporation, list names and address of President, Secretary, and Resident Agent.  
 (b) If a partnership, list name and address of all partners.  
 (c) If an individual, list name and address of individual.  
MARK L. JOSEPH PRES 2100 HUNTINGDON AVE BAL T MD 21211  
TERRANCE OATES SEC. 2100 HUNTINGDON AVE BALTIMORE MD.21211  
DEIDRA HELLWIG RESIDENT AGENT 2100 HUNTINGDON AVE BALTIMORE MD. 21211
4. Mailing Address of Permit Holder: 2100 HUNTINGDON AVE BALTIMORE MD 21211
5. Telephone Number of Permit Holder: 410-727-7300
6. Name of Equipment Owner: ANAS IBRAHIM METWALLY Check here if address or phone number has changed. [ ]
7. Mailing Address of Equipment Owner: 4617 19 EASTERN AVE BOX 25624 BALTIMORE MD 21224
8. Telephone Number of Equipment Owner: 443-802-5609
9. Evidence of Compliance With State Worker's Compensation Laws:  
(check appropriate box)  
 Policy or Binder Number: \_\_\_\_\_ Insurance Company: \_\_\_\_\_ OR  I Have No Employed Drivers

TO BE COMPLETED BY APPLICANT

TO BE COMPLETED BY PSC

PERMIT NO.	MAKE	YEAR	VIN NO.	ISSUED	REMARKS
1452	CHEV	1999	2G1WL52M9X9143634	3/2/00	CHANGE OF EQUIP / HOLDER

Returned PSC Medallion No (s): 1745 + 746 Previous Permit No. \_\_\_\_\_  
-99 97chw 101218 moved to yellow Van Service 58179

I and/or we agree to comply with all city, county, state and federal ordinances, laws and/or statutes.

SIGN HERE: [Signature]

**PUBLIC S (VICE COMMISSION OF MA YLAND**  
**APPLICATION FOR PERMITS FOR THE OPERATION OF TAXICABS IN BALTIMORE COUNTY**  
 (This Form Must Be Typewritten)

*HA 5/16/2000*

**RECEIVED**  
 MAY 10 2000  
 TRANSPORTATION DIVISION

Date: May 9, 2000

1. Full Name of Permit Holder: Trans Cab Inc.
2. Association Name & Address: Jimmy's Cab Association Inc.  
14 Willow Avenue Towson, Maryland 21286
3. Identification of Applicant:
  - (a) If a corporation, list name and address of President, Secretary, and Resident Agent.
  - (b) If a partnership, list name and address of all partners.
  - (c) If an individual, list name and address of individual.

Edward O. Randall Jr. Pres. Res. Agt. 16 Alderman Cr. Timonium, Md. 21093  
Josephine B. Kennedy Sect. Treas. 608 Kingston Rd. Baltimore, Md. 21212  
K. Daniel Geiger V. P. 1218 Oak Croft Dr. Lutherville, Md. 21093
4. Mailing Address of Permit Holder: 14 Willow Avenue  
Towson, Maryland 21286
5. Telephone Number of Permit Holder: 410-823-8294
6. Name of Equipment Owner: Same as above Check here if address or phone number has changed. [ ]
7. Mailing Address of Equipment Owner: Same as above
8. Telephone Number of Equipment Owner: Same as above
9. Evidence of Compliance With State Worker's Compensation Laws:  
(check appropriate box)  
 Policy or Binder Number: \_\_\_\_\_ OR  I Have No Employed Drivers  
 Insurance Company: \_\_\_\_\_

TO BE COMPLETED BY APPLICANT

TO BE COMPLETED BY PSC

PERMIT NO.	MAKE	YEAR	VIN NO.	ISSUED	REMARKS
1223	Buick	1994	1G4AG55M4R647927T	5/16/00	CE

Returned PSC Medallion No(s). 827 + 828 Previous Permit No. \_\_\_\_\_

We agree to comply with all city, county, state and federal ordinances, laws and/or statutes.

SIGN HERE: *Edward O. Randall Jr.*

PUBLIC SERVICE COMMISSION OF MARYLAND

APPLICATION FOR PERMITS FOR THE OPERATION OF TAXICABS IN BALTIMORE COUNTY  
(This Form Must Be Typewritten)

Date: July 18, 2000

1. Full Name of Permit Holder: Trans Cab Inc.  
 2. Association Name & Address: Jimmy's Cab Association Inc.  
14 Willow Avenue, Towson, Maryland 21286

3. Identification of Applicant:  
 (a) If a corporation, list name and address of President, Secretary, and Resident Agent.  
 (b) If a partnership, list name and address of all partners.  
 (c) If an individual, list name and address of individual.  
Edward O. Randall Jr. Pres. Res. Agt. 16 Alderman Crt Timonium, Maryland 21093  
JOSEPHINE B. Kennedy Sect. Treas. 608 Kingston Rd. Balto. Md. 21212  
K. Daniel Geiger V. P. 1218 Oakcroft Rd. Lutherville, Md. 21093

4. Mailing Address of Permit Holder: 14 Willow Avenue  
Towson, Maryland 21286

5. Telephone Number of Permit Holder: 410 823 8294

6. Name of Equipment Owner: Same as above Check here if address or phone number has changed. [ ]

7. Mailing Address of Equipment Owner: Same as above

8. Telephone Number of Equipment Owner: Same as above

9. Evidence of Compliance With State Worker's Compensation Laws:  
 (check appropriate box)  
 Policy or Binder Number: \_\_\_\_\_ OR  I Have No Employed Drivers  
 Insurance Company: \_\_\_\_\_

PUBLIC SERVICE COMMISSION  
RECEIVED

JUL 20 2000

TRANSPORTATION  
DIVISION

TO BE COMPLETED BY APPLICANT

TO BE COMPLETED BY PSC

PERMIT NO.	MAKE	YEAR	VIN NO.	ISSUED	REMARKS
1224	Chev.	1996	2G1WL52M3T9277713	7/21/00	C/E <i>CP 76</i>

Returned PSC Medallion No(s). 156, 157 from 1224 Previous Permit No. N/A

I and/or we agree to comply with all city, county, state and federal ordinances, laws and/or statutes.

SIGN HERE: *Edward O. Randall Jr.*

PUBLIC SERVICE COMMISSION OF MARYLAND  
 PUBLIC SERVICE COMMISSION  
 APPLICATION FOR PERMITS FOR THE OPERATION OF TAXICABS IN BALTIMORE COUNTY

(This Form Must Be Typewritten)

AUG 11 2000

Date: August 9, 2000

1. Full Name of Permit Holder: Trans Cab Inc.  
 2. Association Name & Address: Jimmy's Cab Association, Inc.  
14 Willow Avenue Towson, Maryland 21286

3. Identification of Applicant:  
 (a) If a corporation, list name and address of President, Secretary, and Resident Agent.  
 (b) If a partnership, list name and address of all partners.  
 (c) If an individual, list name and address of individual.  
Edward O. Randall Jr. Pres. Res. Agt. 16 Alderman Cr. Timonium, Md. 21093  
Josephine B. Kennedy Sect. Treas. 608 Kingston Rd. Balto. Md. 21212  
K. Daniel Geiger V. P. 1218 Oak Croft Dr. Lutherville, Maryland 21030

4. Mailing Address of Permit Holder: 14 Willow Avenue  
Towson, Maryland 21286

5. Telephone Number of Permit Holder: 410 823 8294

6. Name of Equipment Owner: Same as above Check here if address or phone number has changed. [ ]

7. Mailing Address of Equipment Owner: Same as above

8. Telephone Number of Equipment Owner: same as above

9. Evidence of Compliance With State Worker's Compensation Laws:  
 (check appropriate box)  
 [ ] Policy or Binder Number: \_\_\_\_\_ OR [X] I Have No Employed Drivers  
 Insurance Company: \_\_\_\_\_

TO BE COMPLETED BY APPLICANT TO BE COMPLETED BY PSC

PERMIT NO.	MAKE	YEAR	VIN NO.	ISSUED	REMARKS
1232	Chev.	1996	2G1WL52MOT9276549	8/14/00	CE

Returned PSC Medallion No(s). No = OK w/c Previous Permit No. \_\_\_\_\_

WARRANT STICKERS REMAIN ON FORMER VEHICLE TO BE PLACED UNDER 1418 - SEE ATTACHED  
 I and/or we agree to comply with all city, county, state and federal ordinances, laws and/or statutes.

SIGN HERE: [Signature]

**APPLICATION FOR PERMITS FOR THE OPERATION OF TAXICABS IN BALTIMORE COUNTY**

SEP 08 2000

(This Form Must Be Typewritten)

Date: AUGUST 31, 2000

Full Name of Permit Holder: R. RUBIN, INC.

2. Association Name & Address: JIMMY'S CAB ASSOCIATION, INC.

14 WILLOW AVENUE  
TOWSON, MARYLAND 21286

3. Identification of Applicant:

- (a)  If a corporation, list name and address of President, Secretary, and Resident Agent.
- (b) If a partnership, list name and address of all partners.
- (c) If an individual, list name and address of individual.

IDENT: RALPH RUBIN 1404 W. MT. ROYAL AVENUE BALTIMORE, MARYLAND 21217  
 PRES: RALPH RUBIN 1404 W. MT. ROYAL AVENUE BALTIMORE, MARYLAND 21217  
 & RESIDENT AGENT: RALPH RUBIN 1404 W. MT. ROYAL AVENUE BALTIMORE, MD 21217

4. Mailing Address of Permit Holder: 200 E. JOPPA ROAD SUITE-200  
TOWSON, MARYLAND 21286

5. Telephone Number of Permit Holder: 410-825-2368

6. Name of Equipment Owner: YOLANDA BLACKWELL Check here if address or phone number has changed. [ ]

7. Mailing Address of Equipment Owner: 200 E. JOPPA ROAD SUITE-200  
TOWSON, MARYLAND 21286

8. Telephone Number of Equipment Owner: 410-825-2368

9. Evidence of Compliance With State Worker's Compensation Laws:

(check appropriate box)

[ ] Policy or Binder Number: \_\_\_\_\_ OR [x] I Have No Employed Drivers  
 Insurance Company: \_\_\_\_\_

TO BE COMPLETED BY APPLICANT

TO BE COMPLETED BY PSC

PERMIT NO.	MAKE	YEAR	VIN NO.	ISSUED	REMARKS
1411	OLDS	1995	1G3AJ55M4S6346854	9-12-00	CERTIFIED EQUIPMENT HOLDER

Returned PSC Medallion No(s). 123+136 Previous Permit No. \_\_\_\_\_

and/or we agree to comply with all city, county, state and federal ordinances, laws and/or statutes.

SIGN HERE: [Signature]



STATE SERVICE COMMISSION  
**APPLICATION FOR PERMITS FOR THE OPERATION OF TAXICABS IN BALTIMORE COUNTY**  
 (This Form Must Be Typewritten)

SEP-08 2000

Date: SEPTEMBER 4, 2000

TRANSFORMATION DIVISION  
 Full Name of Permit Holder: R. RUBIN, INC.

Association Name & Address: JIMMY'S CAB ASSOCIATION, INC.

14 WILLOW AVENUE  
TOWSON, MARYLAND 21286

3. Identification of Applicant:

- (a)  If a corporation, list name and address of President, Secretary, and Resident Agent.
- (b) If a partnership, list name and address of all partners.
- (c) If an individual, list name and address of individual.

PRESIDENT: RALPH RUBIN 1404 W. MT. ROYAL AVENUE BALTIMORE, MARYLAND 21217

SECRETARY: RALPH RUBIN 1404 W. MT. ROYAL AVENUE BALTIMORE, MARYLAND 21217

IDENTIFY AGENT: RALPH RUBIN 1404 W. MT. ROYAL AVENUE BALTIMORE, MARYLAND 21217

4. Mailing Address of Permit Holder: 200 E. JOPPA ROAD SUITE-200  
TOWSON, MARYLAND 21286

5. Telephone Number of Permit Holder: 410-825-2368

6. Name of Equipment Owner: R. RUBIN, INC.  Check here if address or phone number has changed. [ ]

7. Mailing Address of Equipment Owner: 200 E. JOPPA ROAD SUITE-200  
TOWSON, MARYLAND 21286

8. Telephone Number of Equipment Owner: 410-825-2368

9. Evidence of Compliance With State Worker's Compensation Laws:

(check appropriate box)

Policy or Binder Number: \_\_\_\_\_ OR  I Have No Employed Drivers  
 Insurance Company: \_\_\_\_\_

TO BE COMPLETED BY APPLICANT

TO BE COMPLETED BY PSC

PERMIT NO.	MAKE	YEAR	VIN NO.	ISSUED	REMARKS
1380	CHEVY	1994	1G1BL52P1RR136629	7/5/2000	CE

Returned PSC Medallion No(s): 84 & 85 Previous Permit No. \_\_\_\_\_

and/or we agree to comply with all city, county, state and federal ordinances, laws and/or statutes.

SIGN HERE: R. Rubin

PUBLIC SERVICE COMMISSION  
 APPLICATION FOR PERMITS FOR THE OPERATION OF TAXICABS IN BALTIMORE COUNTY  
 (This Form Must Be Typewritten)

3-21-01

MAR 21 2001

Date: MARCH 20, 2001

TRANSPORTATION

1. Full Name of Permit Holder: R. RUBIN, INC.
2. Association Name & Address: JIMMY'S CAB ASSOCIATION, INC.  
14 WILLOW AVENUE  
TOWSON, MARYLAND 21286
3. Identification of Applicant:  
 (a)  If a corporation, list name and address of President, Secretary, and Resident Agent.  
 (b) If a partnership, list name and address of all partners.  
 (c) If an individual, list name and address of individual.  
PRESIDENT, SECRETARY & RESIDENT AGENT:  
R. RUBIN 1404 W. MT. ROYAL AVENUE BALTIMORE MD 21217
4. Mailing Address of Permit Holder: 200 E. JOPPA ROAD SUITE-200  
TOWSON, MD 21286
5. Telephone Number of Permit Holder: 410-825-2368
6. Name of Equipment Owner: JERRY EVERETTE FULLBRIGHT Check here if address or phone number has changed. [ ]
7. Mailing Address of Equipment Owner: 200 E. JOPPA ROAD SUITE-200  
TOWSON, MARYLAND 21286
8. Telephone Number of Equipment Owner: 410-825-2368

After entering if original R. Rubin  
 Certificate of insurance is #1216  
 not attached, please return to  
 Fran Sweet.

Driver's Compensation Laws:  
 (check appropriate box)  
 OR  I Have No Employed Drivers  
 TO BE COMPLETED BY PSC

PERMIT NO.	MAKE	YEAR	VIN NO.	ISSUED	REMARKS
1216	CHEVY	1997	2G1WL52M3V1178066	3-21-01	CE + C/EDdy HOLDER

Returned PSC Medallion No(s) 637+638 Previous Permit No. \_\_\_\_\_

I/we agree to comply with all city, county, state and federal ordinances, laws and/or statutes.

SIGN HERE: R. Rubin Pres.

PUBLIC SERVICE COMMISSION OF MARYLAND

APPLICATION FOR PERMITS FOR THE OPERATION OF TAXICABS IN BALTIMORE COUNTY  
(This Form Must Be Typewritten)

Date: JANUARY 25, 2001

1. Full Name of Permit Holder: EMERALD CAB COMPANY INC.
2. Association Name & Address: JIMMY'S CAB ASSOCIATION INC.  
14 WILLOW AVENUE TOWSON, MARYLAND 21286
3. Identification of Applicant:  
 (a)  If a corporation, list name and address of President, Secretary, and Resident Agent.  
 (b) If a partnership, list name and address of all partners.  
 (c) If an individual, list name and address of individual.  
SHARON D. MAENNER PRESIDENT 5304 MORELLO ROAD BALTIMORE, MARYLAND 21214  
WILLIAM T. MAENNER SR. RESIDENT AGENT 5304 MORELLO ROAD BALTO. MD 21214  
WILLIAM T. MAENNER JR. SECRETARY 5304 MORELLO ROAD BALTIMORE, MD 21214
4. Mailing Address of Permit Holder: 5304 MORELLO ROAD  
BALTIMORE, MARYLAND
5. Telephone Number of Permit Holder: 410-426-1249
6. Name of Equipment Owner: T & T TRANSPORTATION, INC. Check here if address or phone number has changed. [ ]
7. Mailing Address of Equipment Owner: 9505 FULLER AVENUE  
BALTIMORE, MARYLAND 21235
8. Telephone Number of Equipment Owner: 410-668-3047
9. Evidence of Compliance With State Worker's Compensation Laws:  
(check appropriate box)  
 Policy or Binder Number: \_\_\_\_\_ Insurance Company: \_\_\_\_\_ **OR**  I Have No Employed Drivers

TO BE COMPLETED BY APPLICANT

TO BE COMPLETED BY PSC

PERMIT NO.	MAKE	YEAR	VIN NO.	ISSUED	REMARKS
1202	OLDS	1995	1G3AJ5549S6342265	1-26-01	CE
					c/owner

*outgoing 92 Chev 154448 plate 1-24-01*

Returned PSC Medallion No(s). 641 + 757 Previous Permit No. \_\_\_\_\_

I and/or we agree to comply with all city, county, state and federal ordinances, laws and/or statutes.

SIGN HERE: [Signature]

**APPLICATION FOR PERMITS FOR THE OPERATION OF TAXICABS IN BALTIMORE COUNTY**

(This Form Must Be Typewritten)

Date: SEPTEMBER 14, 2000

1. Full Name of Permit Holder: EMERALD CAB COMPANY INC. T.H.S.

2. Association Name & Address: JIMMY'S CAB ASSOCIATION, INC.  
14 WILLOW AVENUE TOWSON, MARYLAND 21286

3. Identification of Applicant:  
 (a)  If a corporation, list name and address of President, Secretary, and Resident Agent.  
 (b) If a partnership, list name and address of all partners.  
 (c) If an individual, list name and address of individual.

HARON D. MAENNER PRESIDENT 5304 MORELLO RD BALTIMORE, MD 21214  
 WILLIAM T. MAENNER ~~SR.~~ RESIDENT AGENT 5304 MORELLO RD BALTIMORE, MD 21214  
 WILLIAM T. MAENNER JR. SECRETARY 5304 MORELLO ROAD BALTIMORE, MD 21214

4. Mailing Address of Permit Holder: 5304 MORELLO ROAD  
BALTIMORE, MARYLAND 21214

5. Telephone Number of Permit Holder: 410-429-8289 T.H.S.

6. Name of Equipment Owner: T & T TRANSPORTATION, INC. Check here if address or phone number has changed. [ ]

7. Mailing Address of Equipment Owner: 9505 FULLER AVENUE  
BALTIMORE, MARYLAND 21294

8. Telephone Number of Equipment Owner: 410-668-3047

PUBLIC SERVICE COMMISSION  
**RECEIVED**  
 SEP 26 2000

**Evidence of Compliance With State Worker's Compensation Laws:**

(check appropriate box)

Policy or Binder Number: \_\_\_\_\_ OR  I Have No Employees

TO BE COMPLETED BY APPLICANT

TO BE COMPLETED BY PSC

PERMIT NO.	MAKE	YEAR	VIN NO.	ISSUED	REMARKS
1240	BUICK	1993	1G4AG55NXP6418313		C/E + C/owner

Returned PSC Medallion No(s): 241 & 442 Previous Permit No. 1371  
with medallions

and/or we agree to comply with all city, county, state and federal ordinances, laws and/or statutes.

SIGN HERE: [Signature]  
 POWER OF ATT FOR EMERALD CAB CO.

6/28/00

**PUBLIC SERVICE COMMISSION OF MARYLAND**  
**PERMITS FOR THE OPERATION OF TAXICABS IN BALTIMORE COUNTY**  
 (This Form Must Be Typewritten)

JUN 29 2000

Date: June 28, 2000

TRANSPORTATION  
 Full Name of Permit Holder: Phoenix Cab Company, Inc.

2. Association Name & Address: Jimmy's Cab Association Inc  
14 Willow Ave. Towson, Maryland 21286

3. Identification of Applicant:  
 (a) If a corporation, list name and address of President, Secretary, and Resident Agent.  
 (b) If a partnership, list name and address of all partners.  
 (c) If an individual, list name and address of individual.  
Jessie Wilkinson Pres. 10600 York Ave. Cockeysville, Md. 21030  
JOHN D. Stange Res. Agt. 20 Castlehill Crt. Lutherville, Md. 21093  
Jessie Wilkinson Secretary 10600 York Ave. Cockeysville, Md. 21030

4. Mailing Address of Permit Holder: 10600 York Avenue  
Cockeysville, Maryland 21030

5. Telephone Number of Permit Holder: 410 666 0543

6. Name of Equipment Owner: Care Trans Corporation Check here if address or phone number has changed. [ ]  
 Mailing Address of Equipment Owner: 14 Willow Avenue  
Towson, Maryland 21286

7. Telephone Number of Equipment Owner: 410 823 8294

**Evidence of Compliance With State Worker's Compensation Laws:**  
 (check appropriate box)

Policy or Binder Number: \_\_\_\_\_ OR  I Have No Employed Drivers  
 Insurance Company: \_\_\_\_\_

TO BE COMPLETED BY APPLICANT

TO BE COMPLETED BY PSC

PERMIT NO.	MAKE	YEAR	VIN NO.	ISSUED	REMARKS
1491	Chev	1996	2G1WL52MOT9275854	2/5/00	CAJ CE
					+
					DRIVER

Returned PSC Medallion No(s). 493 + 499 Previous Permit No. \_\_\_\_\_

I and/or we agree to comply with all city, county, state and federal ordinances, laws and/or statutes.

SIGN HERE: Jessie Wilkinson

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

In the Matter of

Civil Citation No. 01-0451

Edward O. Randall  
Evelyn B. Randall

14 Willow Ave.

Respondents

FINDINGS OF FACT AND CONCLUSIONS 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 20 June 2001, for a hearing on a citation for violations under the Baltimore County Zoning Regulations for operating a service garage and operating a junk yard by storing unlicensed and inoperable motor vehicles on property zoned RO, located at 14 Willow Avenue.

Lavette Street code enforcement inspector stated that the County received a complaint concerning the use of the property. The property was inspected on 5 March 2001 and the inspector found a service garage being operated.

On 5 March 2001, the inspector issued a written correction notice pursuant to §1-7(c) Baltimore County Code, which described with particularity the nature of the violation and the manner of correction. The correction notice was marked in evidence as Plaintiff's Exhibit 1 and was served on the Respondents.

On 24 April 2001, pursuant to §1-7(d), Baltimore County Code, a code enforcement citation was issued. The citation was marked in evidence as Plaintiff's Exhibit 2 and was legally served on the Respondents.

The citation described the violations as follows. Baltimore County Zoning Regulations, §101, 102.1; 204.3A, 204.3B; 408.1, 408.2, 1B01.1D, failure to cease the operation of a service garage, failure to cease the operation of a junk yard by storing unlicensed/inoperable motor vehicles. Further, the citation proposed a civil penalty of \$20,000 to be assessed. A code enforcement hearing date was scheduled for 20 June 2001.

Edward O. Randall, owner of the property at 14 Willow Avenue, Respondent, appeared for the code enforcement hearing and testified. Leo Maenner, owner of Leo's garage at that location, appeared and testified.

Edward C. Covahey, Jr., Esquire appeared on behalf of the Respondents.

Stacy Weiss, Towson Manor Village Community Association appeared and testified. Also appearing and testifying were Claudia Blaize, Bob Lake, Beth Clifford, Blair Melvin, Ellen Burton, Marlen Williamson.

Lavette Street, code enforcement inspector also testified.

Testimony and evidence presented shows that the property is being used as a service garage for motor vehicles and taxicabs.

The Respondents presented an Order of Dismissal of a zoning violation dated 25 April 1978, signed by the then Zoning Commissioner, Eric DiNenna. The Order stated that "14 Willow Avenue enjoys a legal nonconforming use for a service garage." The Order was marked in evidence as Respondent's Exhibit 1. The Order offered by Counsel had a site plan attached which contained the words "No storage of unlicensed or inoperable vehicles outside." The site plan was approved by the Office of Planning & Zoning, signed by James B. Brynes, and dated 12/1/80, and marked Respondent's Exhibit 1A. The Respondent's offered a site plan dated 6/18/01 marked Respondent's Exhibit 2. The Respondent has marked Respondent's Exhibit 2 with X's to indicate where the motor vehicles are parked while waiting to be repaired or picked up.

In addition, the Complainants offered testimony and evidence to show that the motor vehicles including taxicabs are parked all over the neighborhood on Willow Avenue. See Complainant's Exhibit 1,2, and 3.

I find that the Zoning Commissioner's Order dated 25 April 1978 determined that there was no zoning violation because the service garage enjoyed a nonconforming use. The evidence presented by several of the complaining witnesses seems to establish the nonconforming use of a service garage on the subject property.

I visited the subject property on 27 June 2001 and observed 21 motor vehicles, a mix of passenger cars and taxicabs, on the front and side of the building. In addition there were more motor vehicles parked in the rear of the structure. I find that the nonconforming use has been expanded beyond the 25% allowed by law, because of the parking of motor vehicles as marked on a site plan submitted by the Respondents and marked as Respondents Exhibit 2, and by my observations. The Respondents by their testimony and evidence have admitted that the use of this property has expanded by more than the legally permitted 25%. In addition, as a matter of law the use of this property has become intensive beyond that which is permitted for the continuation of the nonconforming use.

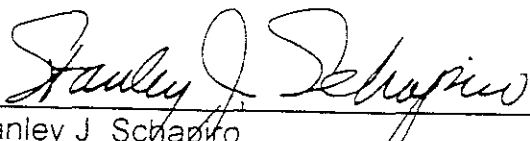
Pursuant to the code enforcement citation issued, and hearing held, and for the reasons set forth above, it is found as a matter of law that code violations existed from 5 March 2001, and the violations are continuing.

THEREFORE IT IS ORDERED by the Code Enforcement Hearing Officer, this 27 day of June 2001 that a civil penalty is imposed in the amount of \$2000.

The Respondents are advised that they must get a special hearing to determine whether the nonconforming use has been expanded legally or remove all motor vehicles on the exterior of the property

IT IS FURTHER ORDERED that if the Respondents obtain a special hearing to determine whether the nonconforming use has been expanded legally and submit a revised site plan to show parking of motor vehicles and remove all motor vehicles of the exterior of the property on or before 15 August 2001, then the civil penalty in the amount of \$2000 shall be suspended

IT IS FURTHER ORDERED that the inspector, monitor the property to determine whether the violations have been corrected.

Signed:   
Stanley J. Schapiro  
Code Enforcement Hearing Officer

The violator is advised that pursuant to §1-7(g)(1), Baltimore County Code, an appeal to the Baltimore County Board of Appeals may be taken within fifteen (15) days after the date of a final Order. §1-7(g)(2) requires the filing of a petition setting forth the grounds for appeal and a filing fee of \$150. The appellant is urged to read the requirements for the appeal petition. Security in the amount of the civil penalty must be posted with the Director



COVAHEY & BOOZER, P. A.

ATTORNEYS AT LAW  
614 BOSLEY AVENUE  
TOWSON, MARYLAND 21204  
AREA CODE 410  
828-9441

EDWARD C. COVAHEY, JR.  
F VERNON BOOZER \*  
MARK S. DEVAN  
THOMAS P. DORE  
MICHAEL T. PATE  
STACIE D. TRAGESER

FAX 410-823-7530

ANNEX OFFICE  
SUITE 302  
606 BALTIMORE AVE.  
TOWSON, MD 21204

\* ALSO ADMITTED TO D C BAR

July 13, 2001

**HAND-DELIVERED**

Stanley J. Schapiro, Code Enforcement  
Hearing Officer  
Baltimore County Department of Permits  
and Development Management  
111 W. Chesapeake Ave.  
Towson, Maryland 21204

Re: 14 Willow Avenue  
Civil Citation No. 01-0451

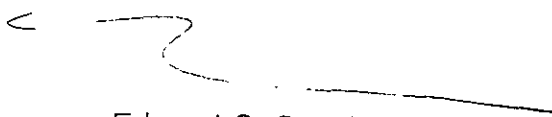
Dear Mr. Schapiro:

Enclosed please find Notice of Appeal. Petition to Accompany Appeal, check in the amount of \$150.00 payable to Baltimore County, Maryland, and certified funds in the amount of \$2,000.00 with respect to security for the civil penalty imposed in the above-captioned.

Please treat this letter as a request that a transcript of the recording be provided at the cost of the Respondent/Appellants.

Thank you for your interest in this matter.

Very truly yours,

  
Edward C. Covahey, Jr.

ECC,Jr./ldr  
Enclosures  
0713ldr01  
cc: Mr Edward O Randall, Jr.

IN THE MATTER OF  
EDWARD O. RANDALL, JR.  
and  
EVELYN B. RANDALL

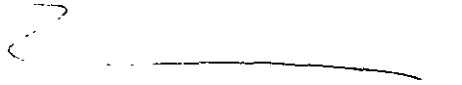
Respondents

\* BEFORE THE  
\* BALTIMORE COUNTY  
\* BOARD OF APPEALS  
\* Civil Citation No. 01-0451

\* \* \* \* \*

**NOTICE FOR APPEAL**


Edward O. Randall, Jr. and Evelyn B. Randall, Respondents in the above-captioned matter, by Edward C. Covahey, Jr. and Covahey & Boozer, P.A., their attorney, appeal the decision of the Code Enforcement Hearing Officer dated June 29, 2001 to the Baltimore County Board of Appeals pursuant to § 1-7(g) of the Baltimore County Code.

  
EDWARD C. COVAHEY, JR.  
Covahey & Boozer, P.A.  
614 Bosley Avenue  
Towson, Maryland 21204  
410-828-9441  
Attorney for Respondents

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 13 day of July 2001, a copy of the foregoing Notice of Appeal was hand-delivered to:

Stanley J. Schapiro, Code Enforcement Hearing Officer  
Baltimore County Department of  
Permits and Development Management  
111 W Chesapeake Ave.  
Towson, Maryland 21204

  
EDWARD C. COVAHEY, JR.

IN THE MATTER OF  
EDWARD O. RANDALL, JR.  
and  
EVELYN B. RANDALL

Respondents

\* BEFORE THE  
\* BALTIMORE COUNTY  
\* BOARD OF APPEALS  
\* Civil Citation No. 01-0451

\* \* \* \* \*

**PETITION TO ACCOMPANY APPEAL**

Edward O. Randall, Jr. and Evelyn B. Randall, Respondents in the above-captioned matter, by Edward C. Covahey, Jr. and Covahey & Boozer, P.A., their attorney, file this petition in support of the Notice of Appeal filed in the above-captioned case. The grounds for this Petition are as follows:

1. That the Code Enforcement Hearing Officer determined in his Findings of Fact and Conclusions of Law entered in the above-captioned case, that by Order of the Zoning Commissioner dated April 25, 1978, the subject property at 14 Willow Avenue, Towson, Baltimore County, Maryland, enjoyed a non-conforming use for a service garage.

2. That the Code Enforcement Hearing Officer determined that the testimony of the complaining witnesses further established that the non-conforming use of a service garage which existed on 14 Willow Avenue pre-empted any zoning ordinance which precluded said use.

3. That the Code Enforcement Hearing Officer found that "the non-conforming use has been expanded beyond the 25% allowed by law, because of

the parking of motor vehicles as marked on a site plan submitted by the Respondents and marked as Respondents' Exhibit 2, and by my observations."

4. That the Code Enforcement Hearing Officer erred in his findings in that there was no evidence that showed that the non-conforming use has been expanded by more than 25%.

5. That the Baltimore County Zoning Regulations, in defining a non-conforming use in § 101, state that, "The non-conforming use is a legal use that does not conform to a use regulation for the zone in which it is located."

6. That the evidence established and showed that the property was used as a service garage prior to the enacting of any zoning ordinance that precluded same, and further, that as part of its use as a service garage, vehicles are parked outside of the improvements on the property in connection with the service garage activities, which occupies the entire property including all buildings and parking areas.

7. That the non-conforming use for the property not only includes use of all improvements and structures on the property, but the parking area and all other portions of the curtilage that support a service garage.

8. That service garages generally involve the parking of vehicles other than inside any improvements while they are waiting to be serviced or after they are serviced.

9. That the decision of the Code Enforcement Hearing Officer deprives the Respondents of the lawful use of their property and to uphold and enforce same

would constitute an illegal taking of the Respondents' property without just compensation.

10. That the evidence established that the Respondents have filed a Petition before the Zoning Commissioner of Baltimore County pursuant to the Baltimore County Zoning Regulations to have a separate hearing before the Zoning Commissioner with respect to the determination of a non-conforming use for the property and the extent of the non-conforming use.

WHEREFORE, the Respondents request that the Baltimore County Board of Appeals:

1. Determine that the non-conforming use for the property includes the structure and all parking areas that are situate within the perimeter property lines of the Respondents' property.

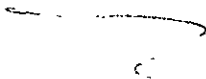
2. That the Baltimore County Board of Appeals vacate the civil penalty that was imposed and order that same be returned to the Respondents.

3. That the Baltimore County Board of Appeals determine that vehicles situate or parked at 14 Willow Avenue for purposes of being repaired may be parked within the parking areas of the property, and further that the parking areas of the site may be used by visitors, invitees and employees as same is inherently part of the use of the property.

4. That the Baltimore County Board of Appeals hold in abeyance any hearing on the above-captioned until the Respondents/Appellants' Petition before

the Zoning Commissioner is adjudicated in that same may well be dispositive of the issues raised in the present Petition.


5. That the Baltimore County Board of Appeals grant unto Respondents such other and further relief as may be appropriate, including a remand for such additional testimony as the Board may determine appropriate.

  
EDWARD C. COVAHEY, JR.  
Covahey & Boozer, P.A.  
614 Bosley Avenue  
Towson, Maryland 21204  
410-828-9441  
Attorney for Respondents

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 13 day of July 2001, a copy of the foregoing Petition Accompanying Appeal was hand-delivered to:

Stanley J. Schapiro, Code Enforcement  
Hearing Officer  
Baltimore County Department of  
Permits and Development Management  
111 W. Chesapeake Ave.  
Towson, Maryland 21204

  
EDWARD C. COVAHEY, JR.

ldr010727





County Board of Appeals of Baltimore County

OLD COURTHOUSE, ROOM 49  
400 WASHINGTON AVENUE  
TOWSON, MARYLAND 21204  
410-887-3180  
FAX: 410-887-3182

Hearing Room - Room 48  
Old Courthouse, 400 Washington Avenue

July 17, 2001

NOTICE OF ASSIGNMENT

CASE #: CBA-01-131  
/ CC-01-0451

IN THE MATTER OF: *Evelyn B. and Edward O. Randall, Jr.*  
Legal Owners / Defendants 14 Willow Avenue (Towson, MD),

Code Inspections and Enforcement Violation / (BCC Section 1-7)

ASSIGNED FOR: THURSDAY, SEPTEMBER 6, 2001 at 9:00 a.m.

NOTICE: 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). For further information, see Board's Rules of Practice & Procedure, Appendix C, Baltimore County Code.

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

Kathleen C. Bianco  
Administrator

cc: Counsel for Appellant /Legal Owner : Edward C. Covahey, Jr., Esquire  
Appellant /Legal Owner : Evelyn B. and Edward O. Randall, Jr.

Jimmy's Cab Association, Inc. /14 Willow Avenue  
R. Rubin, Inc.  
Leo Maenner /14 Willow Avenue

Marlen Williamson Blair Melvin  
Bob Lake Ellen Burton  
Beth Clifford Stacy Weiss  
Claudia Blaize

Stanley J. Schapiro, Code Official /Hearing Officer  
Lavette Street /Code Enforcement Inspector MS 1105  
Arnold Jablon, Director /PDM  
C. Robert Loskot, Assistant County Attorney

JUL 19 2001





County Board of Appeals of Baltimore County

OLD COURTHOUSE, ROOM 49  
400 WASHINGTON AVENUE  
TOWSON, MARYLAND 21204  
410-887-3180  
FAX: 410-887-3182

Hearing Room - Room 48  
Old Courthouse, 400 Washington Avenue

July 17, 2001

NOTICE OF ASSIGNMENT

CASE #: CBA-01-131  
/ CC-01-0451

IN THE MATTER OF: *Evelyn B. and Edward O. Randall, Jr.*  
Legal Owners / Defendants 14 Willow Avenue (Towson, MD);

Code Inspections and Enforcement Violation / (BCC Section 1-7)

ASSIGNED FOR: THURSDAY, SEPTEMBER 6, 2001 at 9:00 a.m.

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

Kathleen C. Bianco  
Administrator

cc: Counsel for Appellant / Legal Owner : Edward C. Covahey, Jr., Esquire  
Appellant / Legal Owner : Evelyn B. and Edward O. Randall, Jr.

Jimmy's Cab Association, Inc. / 14 Willow Avenue  
R. Rubin, Inc.  
Leo Maenner / 14 Willow Avenue

Marlen Williamson Blair Melvin  
Bob Lake Ellen Burton  
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Claudia Blaize

Stanley J. Schapiro, Code Official / Hearing Officer  
Lavette Street / Code Enforcement Inspector MS 1105  
Arnold Jablon, Director / PDM  
C. Robert Loskot, Assistant County Attorney

JUL 19 2001

Date: 15 June 2001

To: Patricia Schoff  
From: Clarence Callahan

Re: Unit Block Willow Avenue, Towson, MD

I am writing this memo to advise you and management of the parking problems that exist on the unit Block of Willow Avenue, Towson, Md.

The entire block is posted as a residential area, requiring a Residential "A" permit, to park in excess of one hour on one side of the street. The other side is posted to allow parking except between the hours of 9 a.m. to 3 p.m., Monday through Friday. As this block contains single family dwellings, dwellings that allow multiple residents (student apartments) and an auto repair facility.

I patrol this area a minimum of twice daily. Each time I find a multitude of violations, ranging from parking in excess of the hour limitation, parking on the wrong side of the street (opposing oncoming traffic) and parking within prohibited areas outside of the posted times. Some of which can be resolved by advising the residents or the auto repair facility of the problem in question. Other times, parking tickets are issued. Verbal confrontations, although one sided on the part of the parties receiving tickets, have been the norm. The auto repair facility seems to represent the bulk of the problem, the students only somewhat a problem and the residents represent a minimal problem.

The magnitude of this problem is bound to increase as time passes. It will require more of my attention, if it worsens. Again, this memo is merely to advise you and management of the existing problem and offers no remedies.

Clarence R. Callahan  
Parking Enforcement Officer

COMPLAINANT'S EXHIBIT 2

TERRENCE B. SHENK  
Chief of Police



Towson, MD 21286  
410) 887 - 2214  
Fax 410) 821 - 8887

June 13, 2001

Ms. Stacy Weiss  
Towson Manor Village  
220 E. Susquehanna Ave  
Towson, MD 21286

Dear Ms. Weiss:

In response to your letter received on June 12, 2001, analysts of the Scanning and Forecasting Team have produced the enclosed table listing all Calls for Service that were coded as Parking Complaints on Willow Avenue during the period starting June 1, 2000 and ending May 31, 2001. None of the calls resulted in a report being written.

If there are any questions, please direct them to Mr. Carl Koprowicz, the lead analyst assigned to this project. He can be reached at 410-887-4649.

Sincerely,

Captain Richard Weih  
Commander  
Criminal Intelligence and Analysis Section

C: Phil Canter, Analysis Teams  
Captain Katherine Meeks-Hall, Precinct 6

COMPLAINANT'S EXHIBIT 3



CALLS FOR SERVICE ON WILLOW AVENUE THAT WERE CODED AS PARKING COMPLAINTS  
 BY THE OFFICER WHO RESPONDED TO THE CALL  
 JUNE 1, 2000 => May 31, 2001

CC NUMBER	ADDRESS	DATE	TIME	REMARKS
001540744	AIGBURTH AV & WILLOW	02-Jun-00	124856	GREY 3/4 TON TRUCK W/WHIT LETTING PRINT ON THE SIDE PKED IN RESD AREA / WEST VA REG UNK TAG PKT ADVISED HE WILL HAVE A UNIT HANDLE THIS
002460255	7 WILLOW AV	02-Sep-00	031738	CALLER ATTEMPTING TO PULL OUT DRIVEWAY DURANGO SUV HAS BLOCKED IN DRIVEWAY
002720749	16 WILLOW AV	28-Sep-00	131133	GEORGE BROWN & ASSOC. BLU MAZDA BLOCKING ENTRANCE TO PLOT
003390849	226 WILLOW AV	04-Dec-00	124411	GOLD LEGEND VA TAGS YUX8096 EXPIRED TAGS 1017 COMP AT 260 SUSQUEHANNA NEG NCIC
003500722	WILLOW AV & YORK RD	15-Dec-00	134118	SEV VEHs PRKD IN NO PARK AREA MS ANON JUST CALLED BACK NOW ADVISES A WHITE SUV IS PARKED PARTIALLY OUT IN STREET IN FRT OF LEO'S GARAGE
003540650	WILLOW AV & YORK RD	19-Dec-00	125758	6 CARS PARKED IN POSTED NO PARKING ZONE ALSO PARKED ON THE SIDE WALK NOW ON GOING PROBLEM SEVERAL CARS ARE FROM LEO'S GARAGE
003560846	18 WILLOW AV	21-Dec-00	152217	BLUE JIMMY'S CAB BLOCKING DRIVEWAY IN FT. 625 DIRECT
003570591	WILLOW AV & YORK RD	22-Dec-00	113101	ON OPPOSITE SIDE IN NO PARKING JIMMY'S CAB #1470 & BLK/BRN FORD F350 P/U
003570829	WILLOW AV & YORK RD	22-Dec-00	140350	3 CARS PARKED IN NO PARKING AREA JIMMY'S CAB BRN OR BLK F/D PU & ISUZU, THIS HAPPENS EVERY DAY, CLR CALLED ABOUT THESE VEHs EARLIER BUT NOTHING WAS DONE ANOTHER CALLER ADVISED SAME SAID IT IS AN ONGOING PROBLEM AND CARS CAN'T GET UP OR DOWN THE STR
010100418	WILLOW AV & YORK RD	10-Jan-01	101643	10 CARS PARKED THE WRONG WAY ON WILLOW, ONGOING PROBLEM
010150604	WILLOW AV & YORK RD	15-Jan-01	125824	3-4 VEHs ON WRONG SIDE OF STREET POSTED AREA 3-4 VEHs ON WRONG SIDE OF STREET POSTED AREA 3-4 VEHs ON WRONG SIDE OF STREET POSTED AREA 3-4 VEHs ON WRONG SIDE OF STREET POSTED AREA
010330641	WILLOW AV & YORK RD	02-Feb-01	110023	2 VEHs IN POSTED AREA
010360544	WILLOW AV & YORK RD	05-Feb-01	124738	4 OF THEM. 1 BLU VAN, 2 RED GMC 4X4, 3 GOLD BRN CAR 4N/F, ALL IN NO PARKING ZONE
010540534	WILLOW AV & YORK RD	23-Feb-01	130806	2 CAB, 1 VAN, & 3 CARS ALL PARKED ON WILLOW AT THE POSTED NO PARK ZONE
011220719	WILLOW AV & YORK RD	02-May-01	123517	IN NO PARKING ZONE 2 JIMMY'S CABS

BALTIMORE COUNTY, MARYLAND  
OFFICE OF BUDGET & FINANCE  
MULTIPLE RECEIPT

No. 0033916

DATE 7/16/01 ACCOUNT R-001-006-3120

AMOUNT \$ 150.00

RECEIVED FROM: Bank of America Cashiers Check

FOR: 01-0451 APPEAL

14 Willow Ave FLZ

CONTRIBUTION  
7 - CASHIER PINK - AGENCY YELLOW - CUSTOMER

1-100 RECEIPT

PAID TO: 0000 FOR: 0000 THE  
DATE: 7/16/01 TIME: 09:33:00  
AMOUNT: 150.00 RECEIVED BY: BRANCH  
RECEIPT # 000000 UETR  
DATE: 7/16/01 FROM: 0000 QUANTITY: 0000  
OR: 0000 QUANTITY: 0000

CASHIER'S VALIDATION



DATE: 03/02/2001  
TIME: 12:10:46

STANDARD ASSESSMENT INQUIRY (1)

RA1001B

PROPERTY NO.	DIST	GROUP	CLASS	OCC.	HISTORIC	DEL	LOAD DATE
09 11 155890	09	2-3	06-00	N	NO		01/08/01
RANDALL EDWARD O				DESC-1.. IMPSLT SS WILLOW AV			
RANDALL EVELYN B				DESC-2.. 165 E YORK RD			
16 ALDERMAN CT				PREMISE. 00014 WILLOW			

LUTH-TIMONIUM MD 21093-0000 FORMER OWNER: KECKNER CHRISTIAN C AVE 00000-0000

FCV		PHASED IN				
	PRIOR	PROPOSED	TOTAL..	CURR FCV	CURR ASSESS	PRIOR ASSESS
LAND:	105,470	128,900		199,700	199,700	75,470
IMPV:	61,160	70,800				
TOTL:	166,630	199,700				
PREF:	0	0	PREF...	0	0	0
CURT:	0	0	CURT...	0	0	0
DATE:	08/95	10/98	EXEMPT.			

TAXABLE BASIS		FM DATE
01/02 ASSESS:	199,700	12/13/00
00/01 ASSESS:	75,470	06/01/00
99/00 ASSESS:	71,060	06/04/99

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

DATE: 03/02/2001  
TIME: 12:10:51

STANDARD ASSESSMENT INQUIRY (2)

RA1001C

PROPERTY NO.	DIST	GROUP	CLASS	OCC.	HISTORIC	DEL	LOAD DATE
09 11 155890	09	2-3	06-00	N	NO		01/08/01
LOT....	BOOK....	0000	MAP.....	0070	LOT WIDTH.....		59.00
BLOCK..	FOLIO...	0000	GRID....	0014	LOT DEPTH.....		.00
SECTION..			PARCEL..	0645	LAND AREA..		10470.000 S
PLAT..					YEAR BUILT.....		00

-----TRANSFER DATA-----

NUMBER..... 081228  
DATE..... 02/14/84  
PURCHASE PRICE..... 80,000  
GROUND RENT..... 0  
DEED REF LIBER..... 06668  
DEED REF FOLIO..... 0330  
CONVEYED IND..... 1  
TOT-PART TRAN IND..... T  
GRANTOR ACCT NO.. 09-11-155890  
CRITICAL NEW CONST CARD  
AREAS CODE YEAR NO  
13116

-----EXEMPT DATA-----

STATUS.....  
CLASS CODE..... 000  
STATE EXEMPT CODE..... 000  
COUNTY EXEMPT CODE..... 000  
CURR STATE EX ASMT.... 0  
PRIOR STATE EX ASMT... 0  
CURR COUNTY EX ASMT... 0  
PRIOR COUNTY EX ASMT.. 0

-----STRUCTURE-----

CODE SQ. FEET  
5432

ENTER-INQUIRY3 PA1-PRINT PF2-INQUIRY1 PF4-MENU PF5-QUIT PF7-CROSS REF



DATE: 02/05/2001  
TIME: 13:11:55

STANDARD ASSESSMENT INQUIRY (1)

RA1001B

PROPERTY NO.	DIST	GROUP	CLASS	OCC.	HISTORIC	DEL	LOAD DATE
09 11 155890	09	2-3	06-00	N	NO		01/08/01
RANDALL EDWARD O				DESC-1.. IMPSLT SS WILLOW AV			
•RANDALL EVELYN B				DESC-2.. 165 E YORK RD			
16 ALDERMAN CT				PREMISE. 00014 WILLOW			

AVE

00000-0000

LUTH-TIMONIUM MD 21093-0000 FORMER OWNER: KECKNER CHRISTIAN C

FCV		PHASED IN				
PRIOR	PROPOSED	CURR	CURR	PRIOR		
		FCV	ASSESS	ASSESS		
LAND:	105,470	128,900	TOTAL..	199,700	199,700	75,470
IMPV:	61,160	70,800	PREF...	0	0	0
TOTL:	166,630	199,700	CURT...	0	0	0
PREF:	0	0	EXEMPT.	0	0	0
CURT:	0	0				
DATE:	08/95	10/98				

TAXABLE BASIS		FM DATE
01/02 ASSESS:	199,700	12/13/00
00/01 ASSESS:	75,470	06/01/00
99/00 ASSESS:	71,060	06/04/99

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

# UPDATE/MESSAGE FORM

Date: 07/02/01

Time: \_\_\_\_\_ a.m. p.m.

Inspector: Street

Case No.: 01-6451

Address: 14 Willow Ave.

Comments: Per Order, P.U. 08/15/01 for  
compliance. Move to ~~AM~~ LG only.

ENTERED INTO AS400 7/3

PLEASE PRINT CLEARLY

~~REGISTER~~ SIGN-IN SHEET

NAME

ADDRESS

back copy →

STACY WEISS

220 E Susquehanna Ave

Claudia Blaize

47 Willow Ave

BOB LAKE

28 WILLOW AVE

Bob

52 Willow Ave

~~JED COUANNY~~

~~614 MOSEY AVE~~

RO RANDALL JR

16 ALDERMAN PET 21093

out copy →

Leo MAENNER

1 1/2 Willow Ave 21281

~~TRAYLOR WILLIAMS~~

~~32 WILLOW AVE~~

SLAIR MELVIN

200 LINDEN Av. 21286

Ellen Burton

272 E. Susquehanna Av. Towson 21286



defined in the Code of Maryland Regulations (COMAR), Title 10, Subtitle 18, Chapter 8, as amended from time to time. [Bill No. 87-1987]

**INFECTIOUS WASTE INCINERATOR** — An enclosed device or contrivance using controlled flame combustion or heat for the thermal destruction of infectious waste or other refuse. [Bill No. 87-1987]

**INOPERATIVE MOTOR VEHICLE** — Any motor vehicle that cannot be operated in its existing condition because the parts necessary for operation, including but not limited to tires, windshield, engine, drive train, driver's seat, steering wheel or column, or gas or brake pedals, are removed, destroyed, damaged or deteriorated. [Bill No. 135-1986]

**JET-PROPELLED SKIS** — A type of watercraft which consists of self-propelled water skis designed to accommodate one or two riders. For the purpose of these regulations, jet-propelled skis shall not be considered boats or recreational vehicles. [Bill No. 54-1993]

**JUNKYARD** — Any land used commercially or industrially for storage or for sale of scrap metal, wastepaper, rags or other junk, and any land, except as provided for by Section 428, used for the storage of unlicensed or inoperative motor vehicles, dismantling or storage of such vehicles or parts thereof, or used machinery, regardless of whether repair or any other type of commercial operation occurs, but excluding scrap for use in manufacturing processes on the premises or waste materials resulting from such processes or resulting from the construction or elimination of facilities for such processes. The term does not include unlicensed motor vehicles located at automotive service stations, service garages or new or used motor vehicle outdoor sales areas, or any vehicle stored pursuant to Section 405A. [Bill No. 135-1986]

**KENNEL** — Any building, other structure or land, or any portion thereof, which is used, intended to be used or arranged for the housing of more than three dogs, not counting puppies less than four months old, for purposes of show, hunting, breeding or sale, or as pets, excluding a farm or pet shop. [Bill No. 85-1967]

**LABORATORY** — A building or group of buildings used primarily for applied and development research where the product-testing process is a major function of the operation, but where the operation does not involve any mass manufacturing. [Bill No. 76-1964]

**LANDSCAPE SERVICE OPERATION** — An operation primarily engaged in the designing, installing, planting or maintaining of lawns, gardens or other plantings at off-site commercial or residential uses. [Bill No. 41-1992]

**LOCALLY GROWN PRODUCE** — Crops which have been produced in Baltimore County or its immediate vicinity. The following areas shall be considered as immediate vicinity: Maryland, Pennsylvania, West Virginia and Delaware. [Bill No. 41-1992]

**LOT, CORNER** — A lot abutting on and at the intersection of two or more streets.

**LOT DEPTH** — The measurement of the depth of a lot from the front boundary to the rear boundary.

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of the

Case Entry/Update  
Format . . . . : CASREC

Mode . . . . : CHANGE  
File . . . . : PDLV0001

Dt Rec: 2022001 Intake: JACOBSON, H Act: \_\_\_\_\_ Case #: 01-0451  
Insp: BANNERMAN, L Insp Grp: ENF Insp Area: 14 Tax Acct: 1413086055  
Address: 14 WILLOW AVE Apt #: \_\_\_\_\_ Zip: 21286  
• Problem Descript.: SUPPOSED TO BE A REPAIR GARAGE, THERE IS A CAB COMPANY BEING  
RUN OUT OF THIS GARAGE WHICH HAS THEIR OWN OFFICE WITHIN THE GARAGE; 2ND TAX ACC  
T NUMBER 1413086640

Complainant Name (Last): WALK IN (First): \_\_\_\_\_  
Complainant Addr: \_\_\_\_\_  
Complainant City: \_\_\_\_\_ State: \_\_ Zip: \_\_\_\_\_  
Complainant Phone (H): \_\_\_\_\_ (W): \_\_\_\_\_  
Date of Reinspection: \_\_\_\_\_ Date Closed: 2052001 Delete Code (P): X

F3=Exit                      F5=Refresh                      F6=Select format  
F9=Insert                    F10=Entry                      F11=Change



DATE: 2, 2, 01 INTAKE BY: HJ CASE #: INSPEC: 14

COMPLAINT LOCATION: 14 WILLOW AVE (LEO'S GARAGE) TOWSON MD ZIP CODE: 21286 DIST:

COMPLAINANT NAME: WALK-IN PHONE #: (H) (W)

ADDRESS: ZIP CODE:

PROBLEM: This is supposed to be a repair garage. There is a cab company being run out of this garage which has their own office within the garage.

IS THIS A RENTAL UNIT? YES NO IF YES, IS THIS SECTION 8? YES NO

OWNER/TENANT INFORMATION:

TAX ACCOUNT #: 1413086055 & 1413086640 ZONING:

INSPECTION:

REINSPECTION:

REINSPECTION:

REINSPECTION:

RE: ZONING VIOLATION :  
 14 and 16 Willow Avenue :  
 9th Election District :  
 Mr. John Katsafanas :  
 14 Willow Avenue :  
 Towson, Maryland 21204 :  
 Defendant :  
 Mr. D. J. Marjullo :  
 P. O. Box 6756 :  
 Baltimore, Maryland 21204 :  
 Defendant :  
 Mr. Christian C. Keckner :  
 10314 Greentop Road :  
 Cockeysville, Maryland 21030 :  
 Defendant :

BEFORE THE  
 ZONING COMMISSIONER  
 OF  
 BALTIMORE COUNTY  
 78-108-V, C-78-166

: : : : : : : : : : :

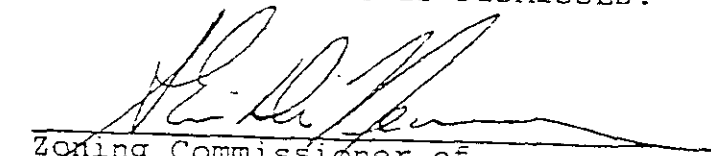
ORDER OF DISMISSAL

: : : : : : : : : : :

A complaint has been filed with the Zoning Office concerning an alleged violation of the Baltimore County Zoning Regulations at the above captioned location in Baltimore County.

14 Willow Road enjoys a legal nonconforming use for a service garage  
 16 Willow Road operation of a business and service garage.

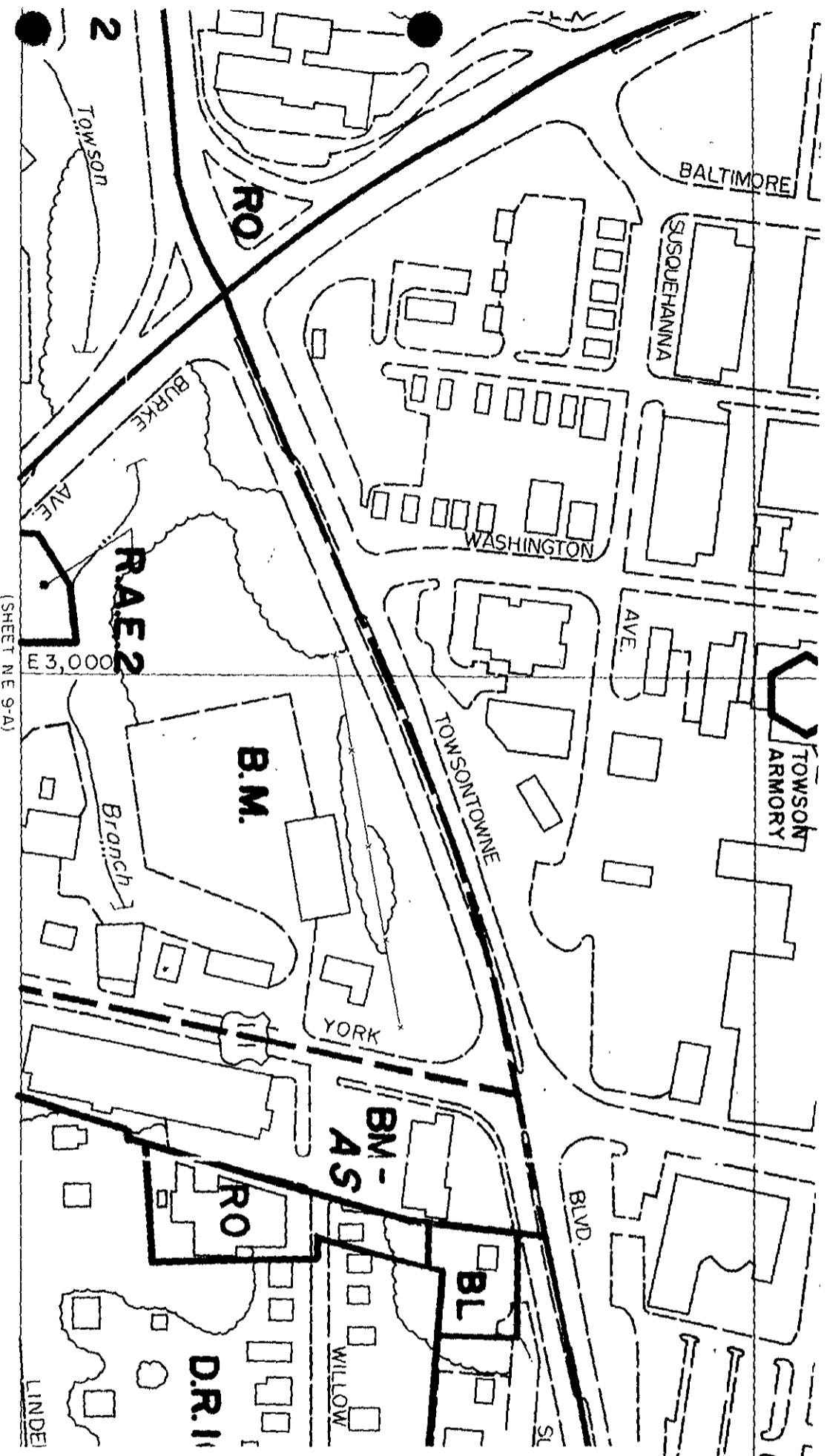
As there appeared no apparent violation of the Baltimore County Zoning Regulations at the present time, the matter is DISMISSED.

  
 Zoning Commissioner of  
 Baltimore County

Date: April 25, 1978



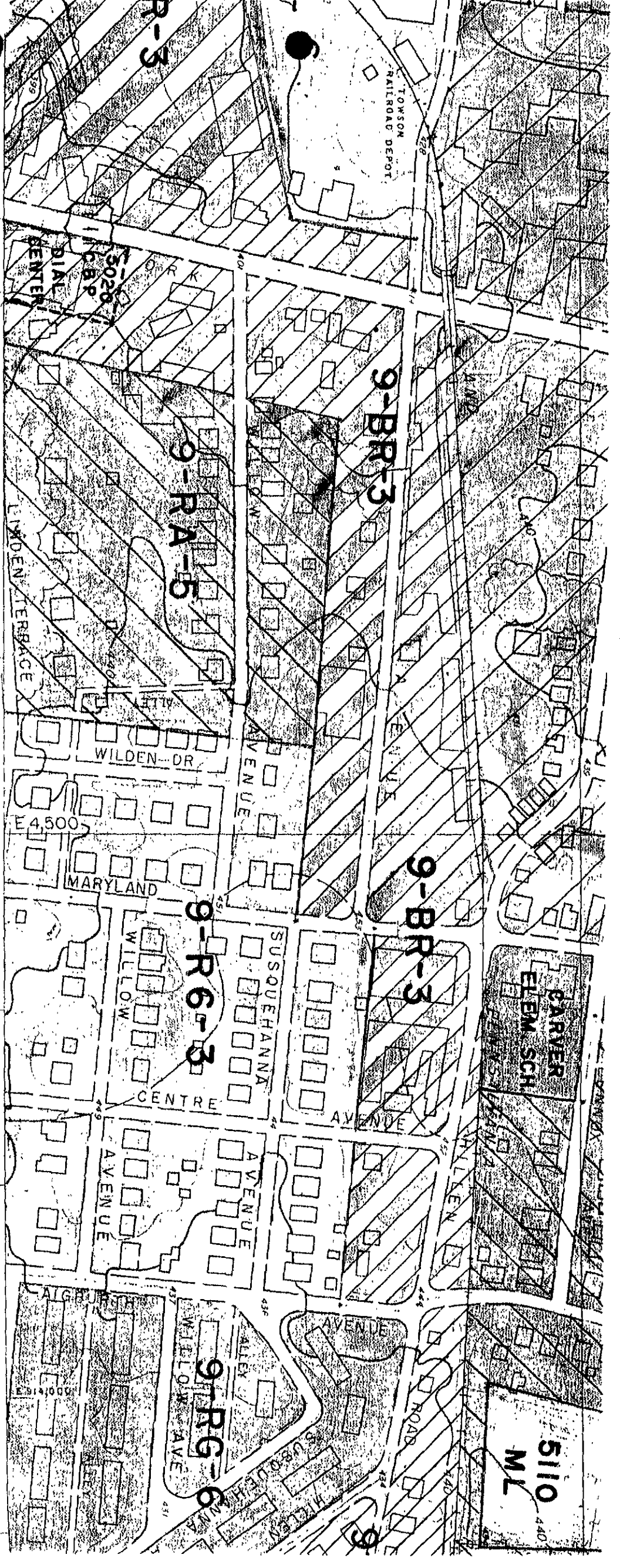
BALTIMORE COUNTY  
OFFICE OF PLANNING AND ZONING  
OFFICIAL ZONING MAP



Edward Esq.  
Co. LOVAKEY, JR.  
614 Resley Ave  
Towson, MD 21204

1/2

**METROPOLITAN AREA ZONING MAP OF 1955**



REVISIONS

BY	DATE

SCALE  
1" = 200'

DATE OF PHOTOGRAPHY  
APRIL 1953

Topography Compiled By Photogrammetric Methods  
AERO SERVICE CORPORATION PHILADELPHIA, PA.

TOWSON  
GENERAL DISTRICT

14 Willow  
Ave.

TR <sup>cliff</sup> WATTS

410-767

8844

Public  
SERVICE  
COMMISSION  
8-5

Dwight

KINES

GEN. KINES  
MGR. 410-767

of OVERSEER  
of

Jimmy's  
ABS

OVERSEER  
MGR.

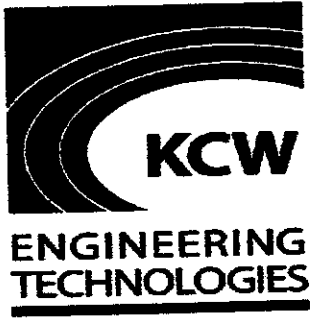
14 Willow  
TRANS

NED  
RANDAL  
MGR. of office  
of Jimmy's  
at 14 Willow

01-0451

Case No. C-78-108-V  
 Location: 16 Willow Avenue  
 Defendant: Mampello, Kickner, Katsafaras  
 Violation: Service garage, Comm. Operation  
 Action(s) Taken: Ack sent 9/29/76  
 Hearing Date: 10/28/76  
 District: 9th Date: 9/29/76 Inspector: Keck

Case No. C-78-106-78-108-V Sec 81-1??  
 Location: <sup>14+</sup> 16 Willow Avenue  
 Defendant: Mampello, Kickner, Katsafaras  
 Violation: Service garage, Comm. Operation  
 Action(s) Taken: Ack sent 9-2-77  
 set for hearing  
 Hearing Date: 10-28-77  
 District: 9th Date: 9-1-77

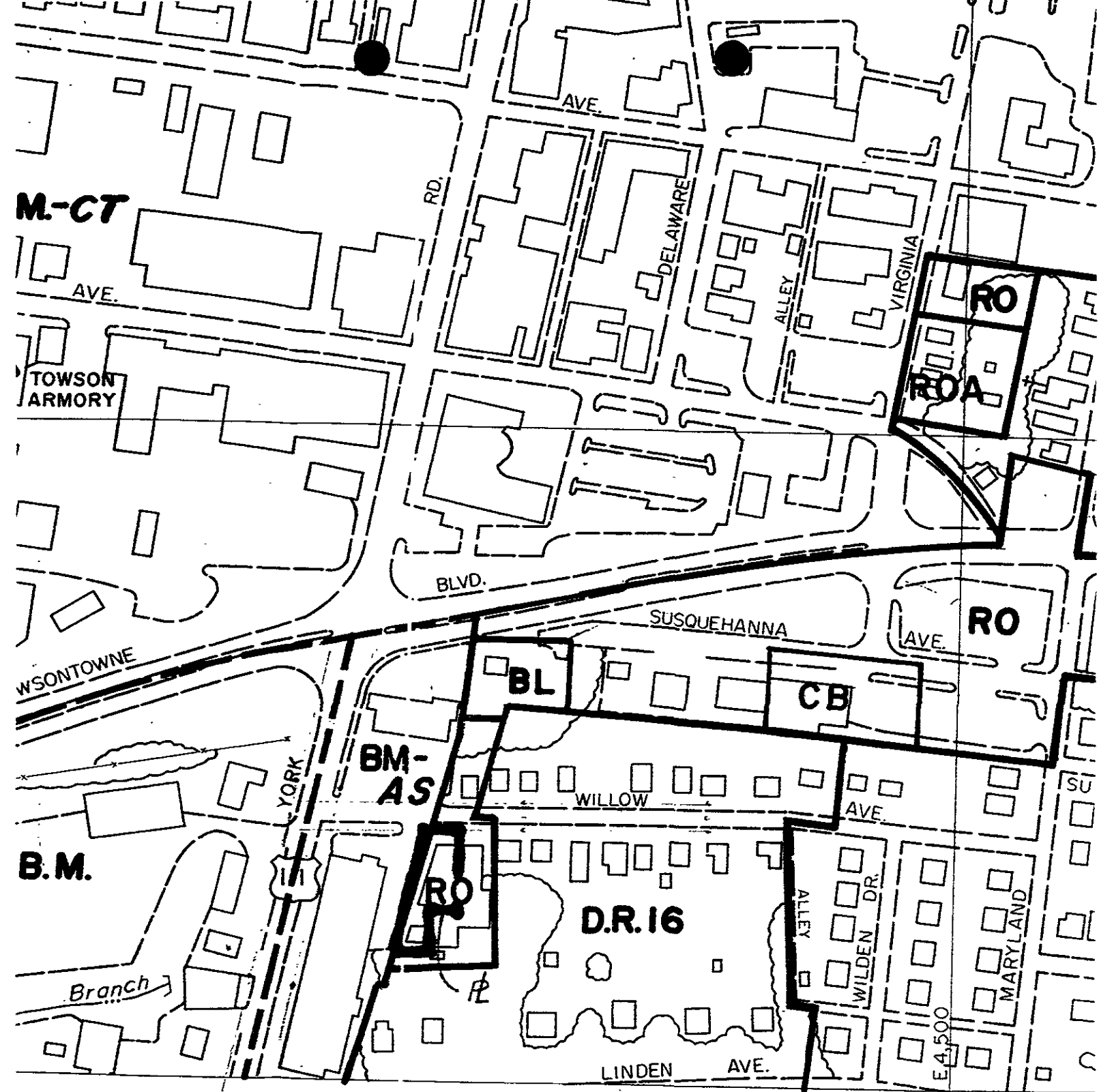


Date: February 8, 2002  
From: Douglas L. Kennedy, P.E.  
Reference: **Randall Property  
#14 Willow Avenue**

**Baltimore County 1" = 200' Scale Zoning Map N.E. 10-A**

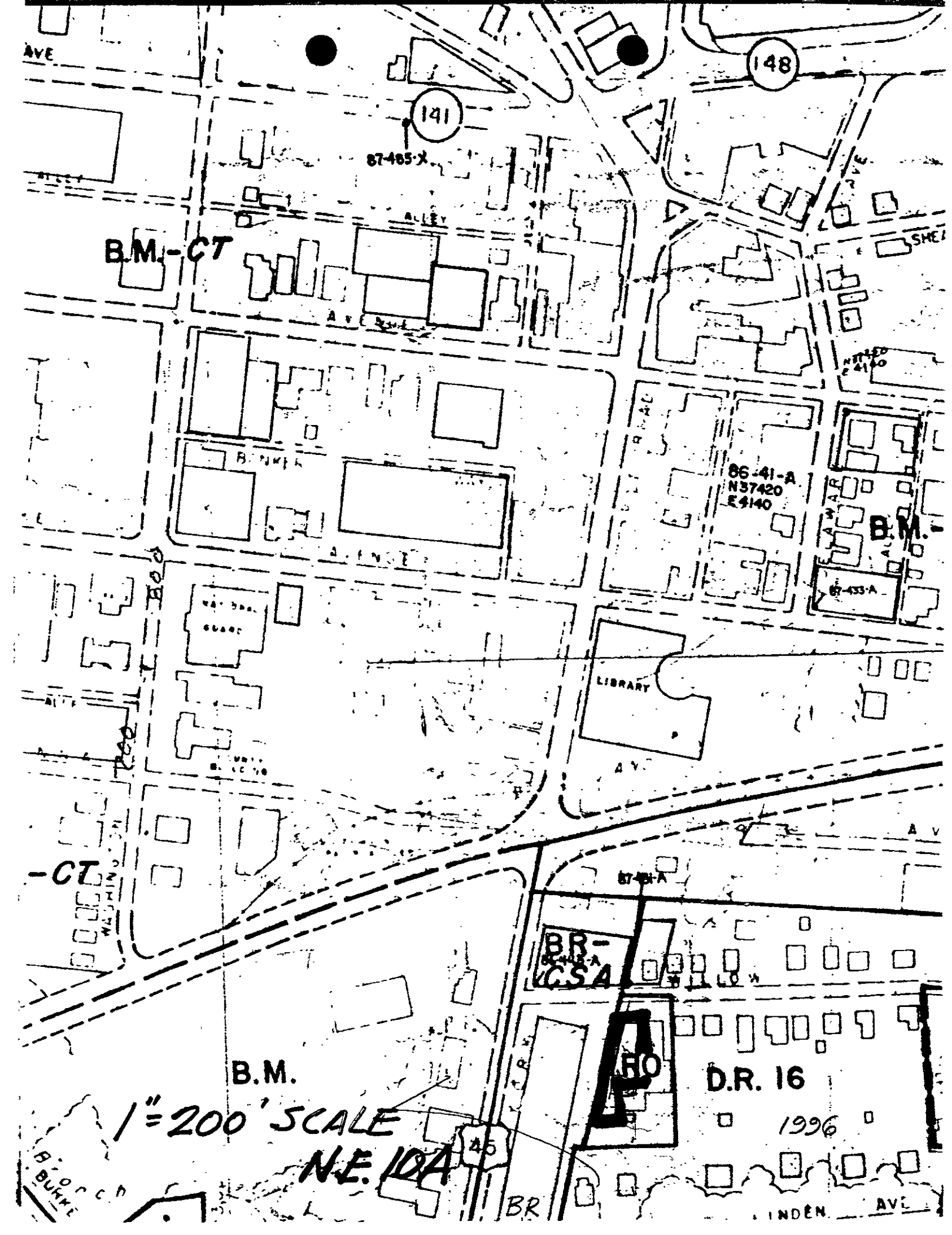
1955	B-R	and	R-A
1971	BR-CSA	and	D.R. 16
1980	BR-CSA	and	D.R. 16
1996	BR	and	RO
2000	BM-AS	and	RO

*Petitioners  
Ex NO 2*



**COUNTY  
 NG AND ZONING  
 NING MAP**

*1" = 200'  
 2000  
 N.E. 10-A*



148

141

87-485-X

B.M.-CT

86-41-A  
N37420  
E4140

B.M.

87-433-A

LIBRARY

-CT

87-51-A

BR-  
CSA

50

D.R. 16

1996

1" = 200' SCALE

NE. 10A

BURKE

BR

INDEN AVE

84-324V  
82-336A  
N3640  
E3500

295  
56900  
500

720V  
7050  
E360

87

80

81-65A  
N3550  
E4570

B.R.-CSA

84-136A  
82-13A  
N3640  
E3560

RO DE 16



RE: ZONING VIOLATION  
 14 and 16 Willow Avenue  
 9th Election District

Mr. John Katsafanas  
 14 Willow Avenue  
 Towson, Maryland 21204  
 Defendant

Mr. D. J. Marjullo  
 P. O. Box 6756  
 Baltimore, Maryland 21204  
 Defendant

Mr. Christian C. Keckner  
 10314 Greentop Road  
 Cockeysville, Maryland 21030  
 Defendant

BEFORE THE  
 ZONING COMMISSIONER  
 OF  
 BALTIMORE COUNTY  
 78-108-V, C-78-166

: : : : : : : : : : :

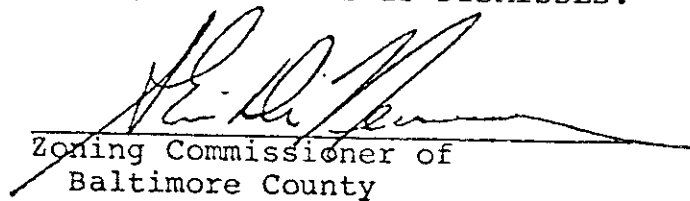
ORDER OF DISMISSAL

: : : : : : : : : :

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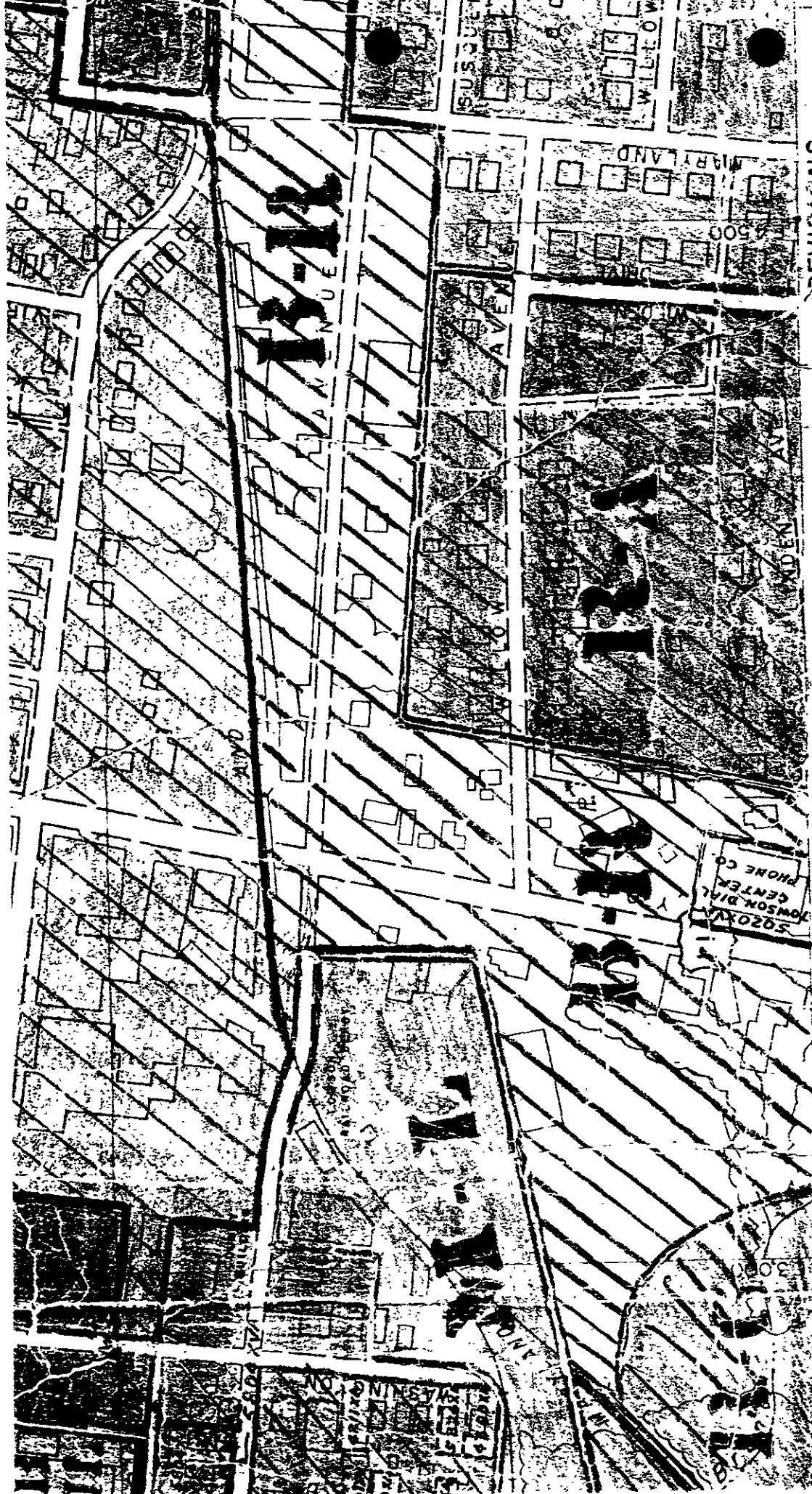
As there appeared no apparent violation of the Baltimore County Zoning Regulations at the present time, the matter is DISMISSED.

  
 Zoning Commissioner of  
 Baltimore County

Date: April 25, 1978

*208. No 4*





REVISIONS

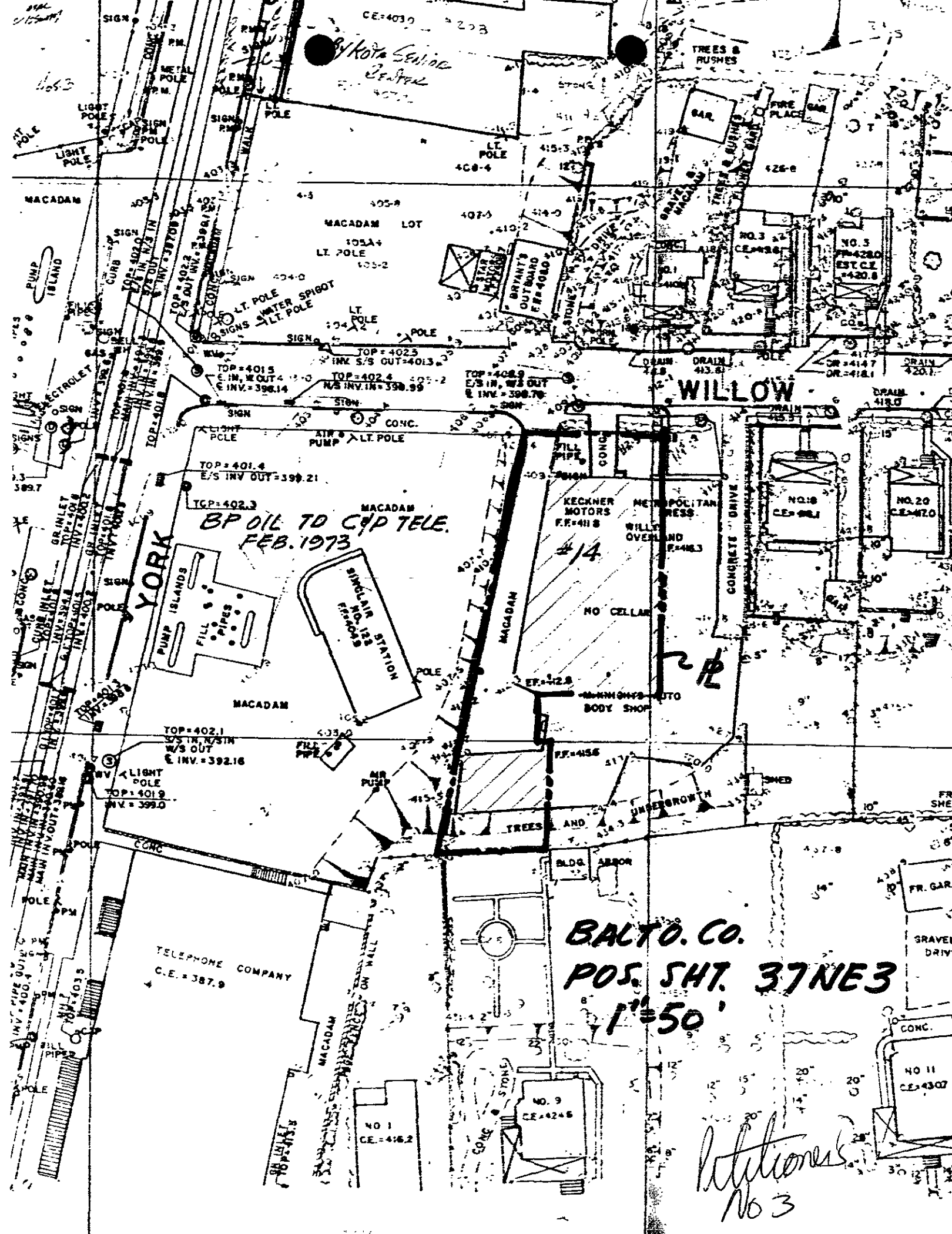
NO.	BY	DATE

Copyright © 1955 by Aero Service Corporation, Philadelphia, Pa.

GRAMMETRIC MAP OF  
 COUNTY METROPOLITAN AREA

N.E. 10-A 1"=200' 1955

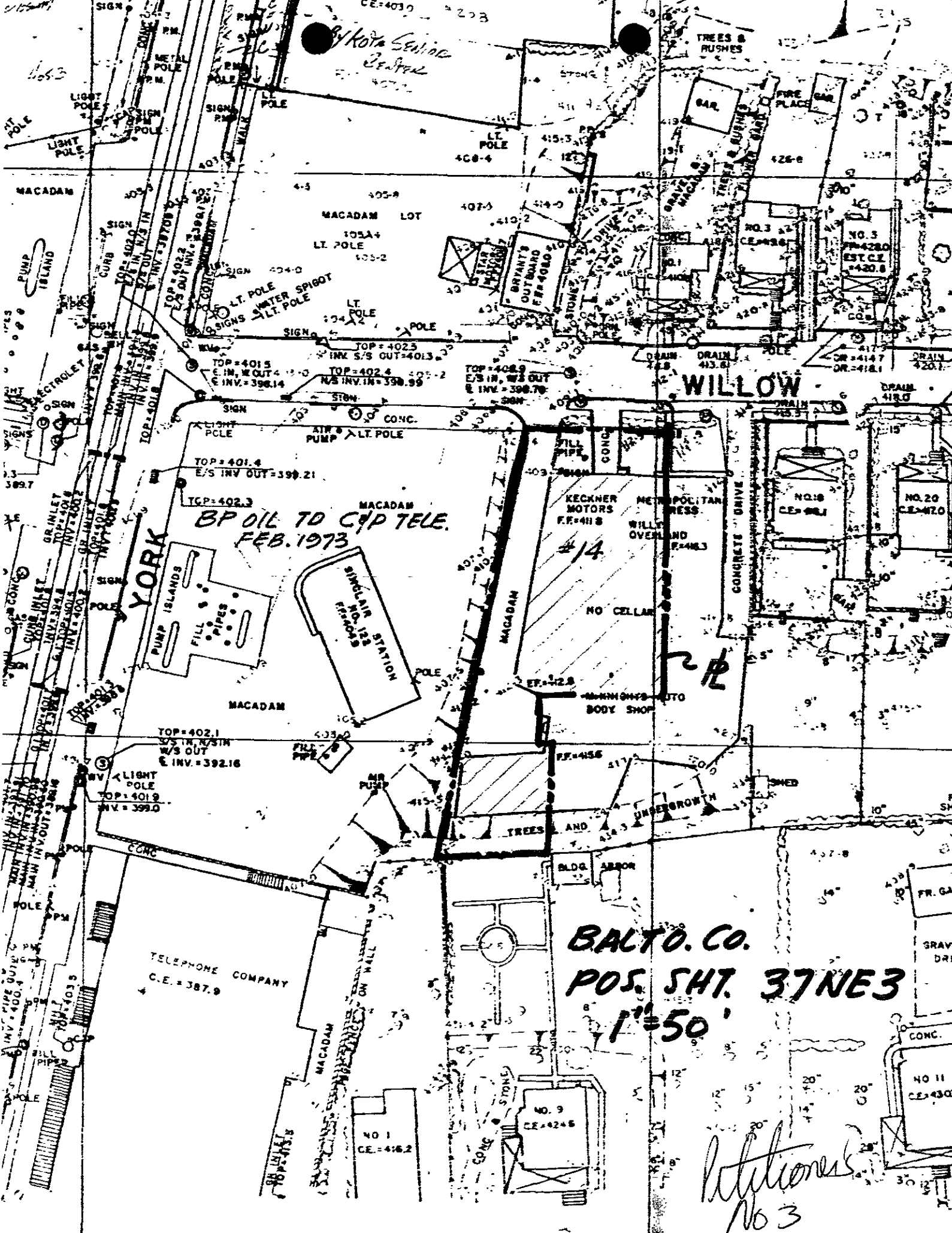
(SHEET 9 A)



BP OIL TO CAP TELE.  
FEB. 1973

BALTO. CO.  
POS. SH. 37NE3  
1"=50'

*Relaciones*  
No 3



CE=4030

MACADAM LOT

TOP=401.4  
E/S INV OUT=399.21

TGP=402.3

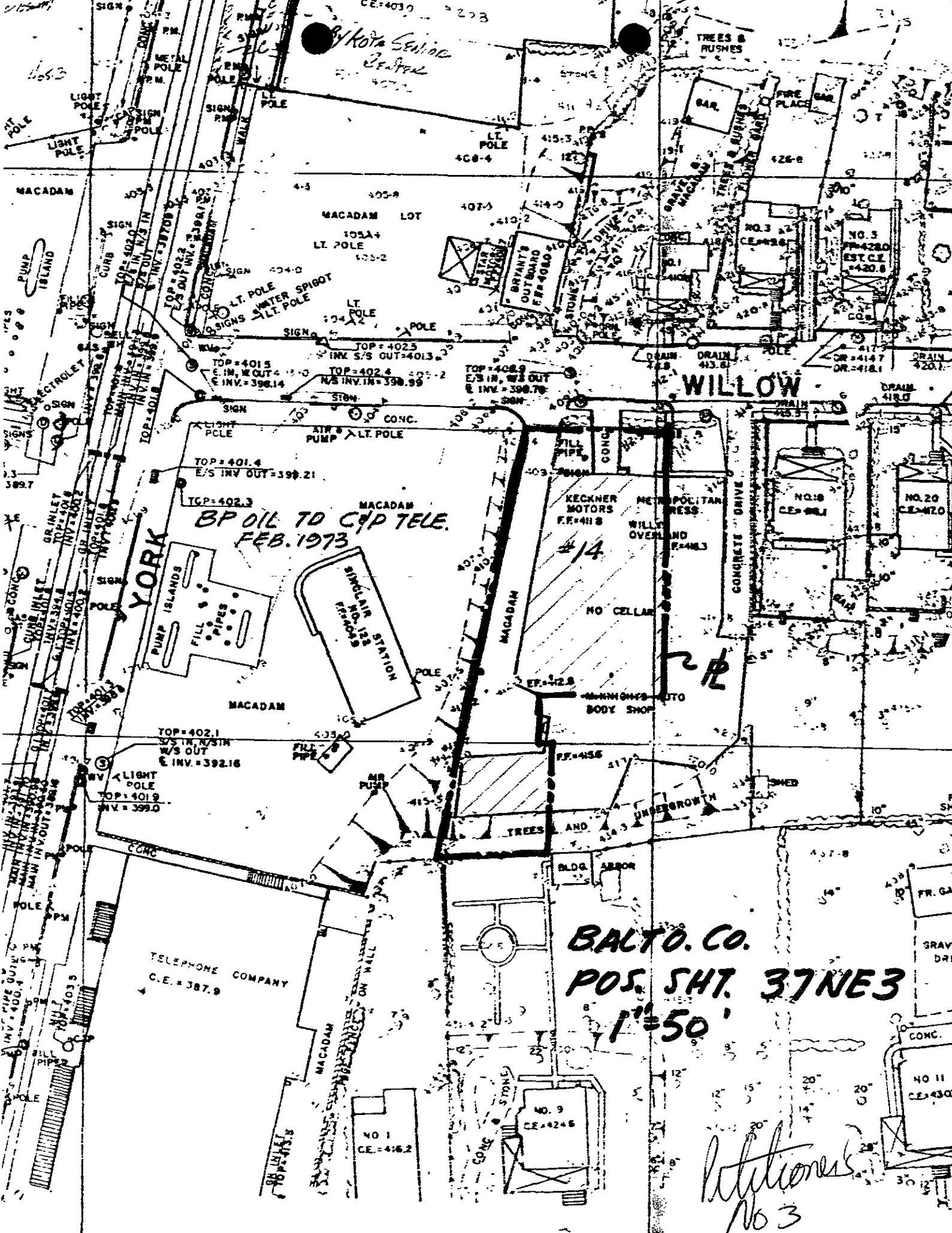
TOP=402.1  
S/S IN, N/S IN  
E/S OUT  
E INV=392.16

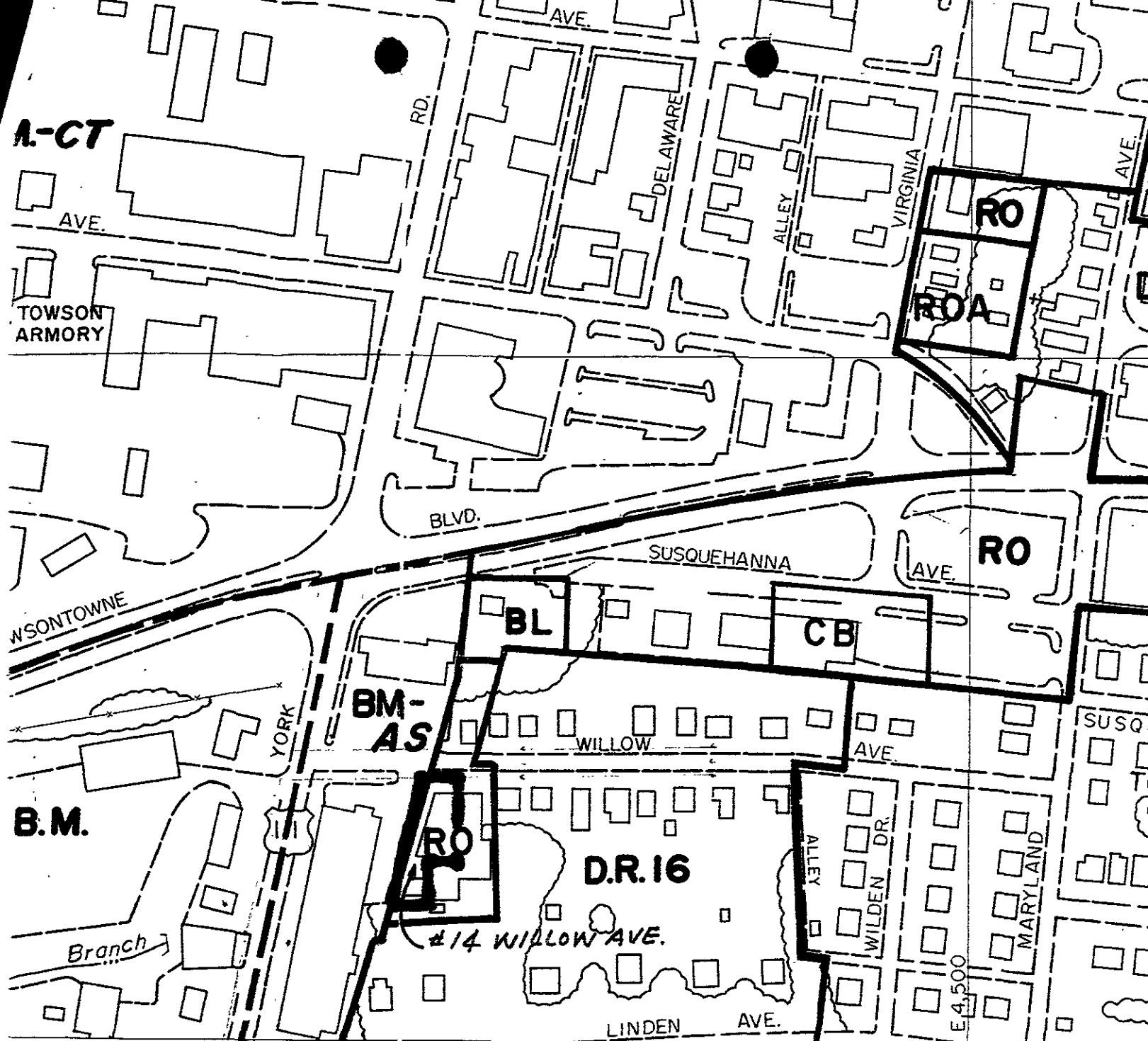
TOP=401.9  
E INV=399.0

TELEPHONE COMPANY  
C.E.=387.9

BALTO. CO.  
POS. SH. 37NE3  
1"=50'

*Relaciones*  
No 3





# COUNTY PLANNING AND ZONING MAP

1" = 200' SCALE  
 2000 ZONING MAP  
 N.E. 10-A

01-532-SP4





**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: #01-532-SPH  
14 Willow Avenue  
S/S Willow Avenue, 183' E York Road  
9th Election District  
4th Councilmanic District  
Legal Owner(s): Evelyn B. & Edward O. Randall, Jr.  
**Special Hearing:** to approve existing non-conforming use service garage & general (non-medical) offices located in a R.O. (Residential-Office zone).  
**Hearing: Wednesday, February 13, 2002 at 2:00 p.m. in Room 407, County Courts Building, 401 Bosley Avenue.**

LAWRENCE E. SCHMIDT,  
Zoning Commissioner for Baltimore County

NOTES: (1) Hearings are Handicapped Accessible; for special 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.

JT1/798 Jan. 29 C517593

# CERTIFICATE OF PUBLICATION

1/31/, 2002

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 1/29/, 2002.

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



LEGAL ADVERTISING



CERTIFICATE OF POSTING

RE: Case No.: 01-532-SPH

Petitioner/Developer: RANDALL, ETAL  
% COVAHEY

Date of Hearing/Closing: 2/13/02

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

Attention: Ms. Gwendolyn Stephens ~~§~~ **GEORGE ZAHNER**

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 #14 WILLOW AVE.

The sign(s) were posted on 1/26/02  
(Month, Day, Year)

Sincerely,

*Patrick M. O'Keefe 2/1/02*  
(Signature of Sign Poster and Date)

PATRICK M. O'KEEFE  
(Printed Name)

523 PENNY LANE  
(Address)

HUNT VALLEY, MD. 21030  
(City, State, Zip Code)

410-666-5366 ; CELL-410-905-8571  
(Telephone Number)

Post-it® Fax Note	7671	# of pages ▲	
		Date	
		From	
		To	
		Co./Dept.	
Co./Dept.		Phone #	
Phone #		Fax #	

