

History Exhibit "A"
715 SW Abode Avenue
Code Case #18-01490

Code Officer Knaggs 2/14/2018 I found open storage including but not limited to barrels, tarps, cinderblocks, wood, a trampoline, a bench, pipes and other misc. items being stored on the vacant lot. I also found numerous boat trailers improperly parked on the vacant lot, a jet ski with expired registration displayed improperly parked on the vacant lot, more than one open trailer in a residential area, open trailers improperly parked on the vacant lot, and an oversized black enclosed trailer (exceeds 20 ft long) improperly parked on the vacant lot. Door hanger. A woman cracked open the door and stated that she was not the homeowner. I asked her if she lived at the home, and she stated that she did not. I left the door hanger on the door and asked the woman to have the homeowner give me a call. Photos on server. Rk

Code Officer Knaggs 2/15/2018 Left message for Jared Greenberg (352-514-6424) @ 10:50 a.m. Rk

Code Officer Knaggs 2/20/2018 On Feb 20, 2018, at 9:05 AM, Rachel Knaggs <rknaggs@cityofpsl.com> wrote:
Jared,

I received your message, and I returned your call on 2/15/18 at 10:50 a.m. Since there was no answer at that time, I left a message. The phone number I have for you is 352-514-6424. Is this the correct number? I have not received any further calls from you. If you would like, please feel free to call me again and I can discuss your violations in further detail. Otherwise, if you would like, I can try to contact you again as long as the number I have is correct.

Greenberg On Feb 20, 2018, at 8:44 AM, Greenberg, Jared <Jared.Greenberg@piper.com> wrote:

Hello Danielle,

Address is 715 SW Abode Ave PSL FL 34953

Attached in the ?Courtesy warning?. I called 772-380-7101 and left a message and have not heard from R Knaggs.

Sincerely,

Jared Greenberg | Power Plant & Mechanical systems Engineer

Ext. 2445

Danielle Williams [mailto:williamsda@stlucieco.org]

Sent: Tuesday, February 20, 2018 8:23 AM

To: Greenberg, Jared <Jared.Greenberg@piper.com>

Subject: RE: Code notice

Good Morning,

Can you please provide your address so that I can research your case?

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Thank you,
Danielle Williams
Code Enforcement Supervisor
St. Lucie County BOCC
Planning and Development Services ? Code Enforcement

Greenberg From: Greenberg, Jared [mailto:Jared.Greenberg@piper.com]

Sent: Monday, February 19, 2018 4:22 PM

To: Danielle Williams <williamsda@stlucieco.org>

Subject: Code notice

Hello, I have gotten a notice and called the officer and left a voice message and have not heard from them.

My neighbors also received them as well. All of them seem to be completely falsely written since none of them match what is below. Please call me or return my email so we can discuss these problems.

I would like to know if relators call if their phone number are recorded as to know who is making the compliant? We seem to have a problem with people writing stuff up that is not accurate.

Jared

Code Officer Knaggs 2/20/2018 Spoke with Jared Greenberg in reference to violations. We went through each individual violation through municode and I explained all violations to him. He stated that he purchased the vacant lot specifically for the trailers. I explained that they could not be parked on the vacant lot, and would have to be parked on his property across the street (the property with his home). He stated that he would go to the magistrate. I explained that the magistrate could not change the ordinances, and they enforce ordinances as written. He stated that he would go to the city council then. Rk

Code Officer Knaggs 2/20/2018 Left message for Jared Greenberg (299-2445) @ 11:23 a.m. Rk

Code Officer Knaggs 2/20/2018 Code: 7.10.03- Animals in a Residential District
Explanation: You may not have more than 5 domestic pets in a residential zone. All barnyard and farm animals are prohibited from this zoning.

Code: 10-56: Certificate of Competency

Explanation: Any person and or company engaging in business as a contractor is required to have a certificate of competency. Please note that this is not the same as an Occupational License.

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Code: 6.00.00 - Vegetation Removal Permits

Explanation: Before any clearing or removal of any vegetation contractors and homeowners should check with the Environmental Department. A Permit or Exemption may be required.

Code: *Revised* 8.00.03(F) LDC - Outside Storage Of Boats, Trailers, & RV's:

Explanation: No property can have more than 2 vehicles on their property unless over 1 acre. All boats, trailers, and RV's that are parked in the front of the property must be on a concrete pad, you can only have one vehicle in the front area of the property.

Code: 7.10.14 - LDC Or 1-20-42 CCL - Commercial Vehicles In A Residential Zone:

Explanation: Any vehicle that weighs more than 10,000 lbs. GVW (Gross Vehicle Weight) or has dual axles cannot be parked or stored in a residentially zoned area. These types of vehicles must be stored in a commercial zone. They are also not to be parked on any county right of way.

Code: Section 34-24 Code & Compiled Laws:

Explanation: Junk, Trash, and Debris on the Right Of Way. Any items disposed or placed on county right of way even for pick-up must be removed within a reasonable time. If your local pick-up service has not picked up your items, you should contact them, as you items may not meet regulations.

Code: Section 38-26 Code & Compiled Laws:

Explanation: Unserviceable or abandon vehicles, missing engine and body parts, flat tires, broken lights or windshield, or is not road worthy will be considered an unserviceable vehicle.

Code: Section 11.05.01 LDC:

Explanation: LDC = Land Development Code - Building without a permit. Anytime renovations are made, a new structure is added, plumbing, electrical, fences, sheds, decks, docks, etc. have been altered a permit is required. Starting required work without the proper permits can result in Stop Work Order Fees - \$100, Double Permit Fees, and Code Enforcement Board fines. If you are not sure that you need a permit you should contact the Building Department before beginning. You can call 462-1553 for information, and please be specific.

Code: Section 38-97 Code & Compiled Laws:

Explanation: Unsanitary Nuisance - all property must be maintained as not to cause an unsanitary nuisance to surrounding properties. Overgrowth of grass and weeds are big causes of unsanitary nuisances.

Code: Section 38-26 Code & Compiled Laws

Explanation: Junk, Trash, & Debris: Items stored outside, or left out side must be moved to a fully enclosed building. Such as: wood, metal, cans, building materials, furniture, etc. Carports are not fully enclosed buildings. Large accumulation of items will be considered junk or salvage and is not permitted in residential areas.

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Code Officer Knaggs 2/20/2018 Spoke with Jared Greenberg in reference to violations. He stated that he is applying through the city council for a unity of title and if granted he will not need to move everything. I explained that even if they granted a unity of title, he would still not be permitted to utilize the lot for the storage of all of the items per the ordinance. He stated that he would wait to see what the legal dept and city council have to say. Rk

Code Officer Knaggs 2/23/2018 On Feb 23, 2018, at 10:04 AM, Rachel Knaggs <rknaggs@cityofpsl.com> wrote:

Jared,

I do not believe that there are any designated areas in the city to park the trailer. Unfortunately, for the trailer to be considered recreational, it would have to be under the 20 ft size limit to be permitted to be parked in a residential area. There are a few privately owned parking areas, but I am unable to give any details to those. To find out what would be permitted to be built on the vacant lot, you would need to contact Building Department. They will be able to let you know what you could get permits for. You may also need to check with Planning and Zoning. Once a principle structure has been built, at that point, you would be able to park the boat trailers on the property, as long as they were in compliance with the parking regulations designated for them. Unfortunately, if you just put a concrete slab on the vacant lot with no structure, the bot trailers would still not be able t be parked there due to not having a principle structure on the property. There are no restrictions at this time on the amount of boat trailers you can have on the property, as long as they have current registration and are legally parked. Utility trailer fall under a different ordinance, and you are only permitted to have one enclosed trailer (properly parked, with no writing on the exterior of the trailer, with current registration, smaller than 20 ft long) and one open trailer (properly parked, must have current registration, cannot exceed 32 sq ft or 3 ft in height and cannot openly store anything). If anyone is violating this ordinance, their trailer must be in compliance or they are not permitted to be parked in a residential area. If the wave runner has current registration, please make sure to place the updated sticker on so there is no more confusion. We received a complaint regarding a very large area, in which your street was included, and I am unsure where this complaint case from. We have been sweeping the area in response to the complaint that was received. Unfortunately, I am not permitted to grant any extensions, but if the violations are corrected before a case goes to a Special Magistrate Hearing, we are able to still close the case.

I hope I was able to answer any questions that you may have. If you have any further questions or concerns, please feel free to contact me.

Thank you,
Rachel Knaggs

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(772)380-7101

Greenberg 2/23/2018 On Feb 21, 2018, at 3:43 PM, Jared Greenberg
<greenberg.jared@gmail.com> wrote:

Hello Ms. Knaggs

Thank you for doing such an important job in our city and for taking my phone calls.

I have a few followup questions if I understand the code below for the black "enclosed" trailer which I believe is qualified as a "Recreational" trailer. Where is the closest city designated area to park the trailer for free "Parking in designated areas. Recreational vehicles may be parked in designated areas which the city may designate from time to time."? From my understanding I cannot build an "enclosed garage" since there is not a house on the vacant lot. Unless I can build a "Tiny" home and build the 6 car garage to store all my "illegal" trailers. Will the city allow this? I find it very odd that the city wants trailers stored on "concrete" surfaces which is not porous and will cause flooding of the next door neighbor. If I placed a 60 ft x 30 ft concrete pad will this be OK to park trailers on? I cannot find a restriction on the number of boat trailers, is this true? I can only have one open utility trailer but unlimited "recreational trailers ie boat trailers"?

As you can tell below that the WaveRunner is not expired.

With all the hundreds of lawn cutting companies in PSL (trailers longer than 20 ft) are you telling me they cannot park at their house? Where are they parking?

Also was it a Realtor that has complained about the street? If so I would like to know which one. So I can request a code be created to fine such complaints etc... I would think people moving in would want to know who they will be living next to.

The city commissioners will meet on this at the end of March to discuss this trailer storage problem that I have that is illegal according to the city's code. Please hold off on doing an re-inspection until the commissioners have meet and discuss use of my vacant lot to store "personal" none commercial trailers and the open storage for my 7 open permits on my house.

Code Officer Knaggs 2/23/2018 License Plate: MPG61 (TOYOTA) Expires: 11/3/2018

You may renew this registration within three months of the expiration date.

Get a Duplicate Registration -- \$3.75 (*** NO DECAL will be issued ***)

Take no action

License Plate: BUZNB (AMERICAN HONDA MOTOR CO, INC) Expires: 11/3/2018

You may renew this registration within three months of the expiration date.

Get a Duplicate Registration -- \$3.75 (*** NO DECAL will be issued ***)

Take no action

License Plate: JBMZ56 (NISSAN NORTH AMERICA, INC.) Expires: 11/3/2018

You may renew this registration within three months of the expiration date.

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Get a Duplicate Registration -- \$3.75 (*** NO DECAL will be issued ***)

Take no action

License Plate: Z79BDX (MASTERCRAFT) Expires: 11/3/2019

You may renew this registration within three months of the expiration date.

Get a Duplicate Registration -- \$3.75 (*** NO DECAL will be issued ***)

Take no action

License Plate: Y20719 (KAWASAKI) Expires: 11/3/2018

You may renew this registration within three months of the expiration date.

Get a Duplicate Registration -- \$3.75 (*** NO DECAL will be issued ***)

Take no action

License Plate: CMTR09 (HOMEMADE) Expires: 11/3/2018

You may renew this registration within three months of the expiration date.

Get a Duplicate Registration -- \$3.75 (*** NO DECAL will be issued ***)

Take no action

License Plate: GRENY (FORD) Expires: 11/3/2018

You may renew this registration within three months of the expiration date.

Get a Duplicate Registration -- \$3.75 (*** NO DECAL will be issued ***)

Take no action

License Plate: 1140IK (HOMEMADE) Expires: 11/3/2018

You may renew this registration within three months of the expiration date.

Get a Duplicate Registration -- \$3.75 (*** NO DECAL will be issued ***)

Take no action

License Plate: 1081QE (SNOWBEAR) Expires: 11/3/2019

You may renew this registration within three months of the expiration date.

Get a Duplicate Registration -- \$3.75 (*** NO DECAL will be issued ***)

Take no action

License Plate: 8229YA (CONTINENTAL TRAILERS/WATERLAND MANUFACTURING INC.)

Expires: 11/3/2019

You may renew this registration within three months of the expiration date.

Get a Duplicate Registration -- \$3.75 (*** NO DECAL will be issued ***)

Take no action

License Plate: FL3481HC (POLARIS INDUSTRIES, INC) Expires: 11/3/2019

You may renew this registration within three months of the expiration date.

Get a Duplicate Registration -- \$3.50

Take no action

License Plate: FL3427LG (STARCRAFT MARINE LLC) Expires: 11/3/2019

You may renew this registration within three months of the expiration date.

Get a Duplicate Registration -- \$3.50

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Take no action

License Plate: FL0589LS (POLARIS BOATWORKS) Expires: 11/3/2018

You may renew this registration within three months of the expiration date.

Get a Duplicate Registration -- \$3.50

Take no action

License Plate: FL5948LU (GRUMMAN BOATS INC) Expires: 11/3/2018

You may renew this registration within three months of the expiration date.

Get a Duplicate Registration -- \$3.50

Take no action

Code Officer Knaggs 3/1/2018

Aaron,

As per our conversation, the violations on the above property remain, therefore I will be continuing the case. The last time I had contact with the owner, Jared (via email) on 2/21/18, he requested that I not do anything with the case until the "City Commissioners" meet at the end of March, but I explained that i would not be able to postpone the case. I updated Michael Hahn regarding this property when I first spoke with the owner, Jared on 2/20/18 via phone, but I will continue to update you, Michael Hahn and Billy via email. If you have any further questions, please do not hesitate to contact me.

Sent from my iPad

Code Officer Knaggs 3/1/2018 Violations remain. The new sticker was not placed on the jet ski. All other violations remain. I sent an email to Aaron Biehl, Michael Hahn and Billy advising that the violations remain and the case will be continued. Photos on server. Rk

Code Officer Knaggs 3/9/2018

Jared,

Thank you for contacting me regarding your property. I do not have an email address for the Special Magistrate. The Special Magistrate is an independent magistrate contracted through the city whose only purposes is to hear testimony and evidence presented from both parties and make a ruling. The Special Magistrate cannot change ordinances, and must enforce the ordinance as written. You would need to contact your council person for a possible ordinance change.

If you have any further question, please feel free to contact me.

Thank you,
Rachel Knaggs

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(772)380-7101

Greenberg On Mar 9, 2018, at 11:00 AM, Jared Greenberg <greenberg.jared@gmail.com> wrote:

Hello Rachel,

We have been working on the list, we have removed one trailer and should have two more removed by this weekend.

Do you know the Special Magistrate email address? I have a few questions for him and how the code can get changed because as you can tell from the attached Power point. The city trailer code is not realistic but that is not what concerns you. You are doing your job per what the code says.

Keep up the great work.

Code Officer Lubeck 4/2/2018 I called and left voice messages for Mr. Greenberg at two number, 772-299-2445 and 352-514-6424. requesting for him to call me back regarding his concerns after receiving email Friday 3/30/18 at 1:05pm from Mayors office below. MBL Mike,

Here is the resident's contact information:

Jared Greenberg
702 and 715 Adobe Ave
greenberg.jared@gmail.com
772-299-2445 or 772-567-4361

The active case number is CE-18-01490 and this is for his vacant lot where he has open storage, improperly parked trailers and vehicles. He spoke to the Mayor about this today and the Mayor requested you speak with Jared. Jared has been advised that he does not qualify for a unity of title and he can't keep the items at the vacant lot.

?A City for All Ages? Christina Flores

Executive Assistant

Office of the Mayor and City Council

City of Port St. Lucie

121 S.W. Port St. Lucie Blvd

Port St. Lucie, Florida 34984-5099

772.873.6472 office | 772.871.7382 fax

cflores@cityofpsl.com

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Code Officer Biehl 4/3/2018 On Apr 3, 2018, at 2:41 PM, Aaron Biehl <ABiehl@cityofpsl.com> wrote:

Mr. Greenberg,

Let me first start by introducing myself, my name is Aaron Biehl. I am one of the two Code Compliance field supervisors. I have spoken to both Specialist Knaggs and Mr. Lubeck in regards to your case. While the plan you have to put up decorative landscaping on your lot looks great, I just wanted to remind you that even with this landscaping up you would not be able to store any items on the vacant lot or build on the vacant lot without obtaining proper permits from the Building Department. In regards to parking, our ordinance requires for all parking that there be a primary structure on the property so that would exclude you from parking any vehicles on the lot as well as storing any items on the lot as well. If you have any questions please feel free to reach out.

Thanks,

Aaron Biehl

Code Compliance Supervisor / Nuisance Abatement Coordinator

From: Rachel Knaggs

Sent: Tuesday, April 03, 2018 1:36 PM

To: Aaron Biehl <ABiehl@cityofpsl.com>

Subject: Fwd: What do you think of the design?

Begin forwarded message:

From: Jared Greenberg <greenberg.jared@gmail.com>

Date: April 3, 2018 at 1:22:52 PM EDT

To: Rachel Knaggs <rknaggs@cityofpsl.com>

Subject: Fwd: What do you think of the design?

Hello Rachel,

We are still working on 715 SW Abode, we are going out of town till April 11th and that weekend I hope to move all the trailers. I spoke with Mike Lubeck and we are going to place a privacy hedge around the lot. Let me know what you think of the design. Once we have the lot cleared, I am hoping by the end of April would you be able to do a follow up inspection?

Sincerely,

Jared Greenberg

----- Forwarded message -----

From: Jared Greenberg <greenberg.jared@gmail.com>

Date: Tue, Apr 3, 2018 at 11:11 AM

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Subject: What do you think of the design?

Greenberg To: mlubeck@cityofpsl.com

Hello Mike,

Thank you for coming out and looking at the property. Let me know what you think of the design. I am working on getting all the trailers off the lot till we get the privacy hedge planted. Looking forward to your suggestions.

--

Sincerely,
Jared Greenberg

Code Officer Biehl 4/4/2018 On Apr 4, 2018, at 9:48 AM, Aaron Biehl <ABiehl@cityofpsl.com> wrote:

Begin forwarded message:

From: Aaron Biehl <ABiehl@cityofpsl.com>

Date: April 4, 2018 at 8:19:15 AM EDT

To: Jared Greenberg <greenberg.jared@gmail.com>

Cc: Mike Lubeck <mlubeck@cityofpsl.com>, Billy Henson <BHenson@cityofpsl.com>

Subject: RE: What do you think of the design? 715 SW Abode.

Mr. Greenberg,

Good morning,

In regards to your property across the street it is my understanding that Mr. Lubeck the Assistant Director of Neighborhood Services actually met with you at the property and explained you could not park anything there. Also Mr. Lubeck is in the process of drafting a memo to answer all of your concerns to various Departments. If you need anything further please let me know.

Aaron Biehl

Code Compliance Supervisor / Nuisance Abatement Coordinator

Greenberg From: Jared Greenberg [mailto:greenberg.jared@gmail.com]

Sent: Tuesday, April 03, 2018 4:24 PM

To: Aaron Biehl <ABiehl@cityofpsl.com>

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Cc: Rachel Knaggs <rknaggs@cityofpsl.com>; Billy Henson <BHenson@cityofpsl.com>; Michael Hahn <MHahn@cityofpsl.com>; Greg Oravec <Mayor@cityofpsl.com>; Christina Flores <CFlores@cityofpsl.com>

Subject: Re: What do you think of the design? 715 SW Abode.

Hello Aaron,

Thank you for responding to the follow up email.

So I cannot do anything on this property? What can we do with a empty lot across from our house? What does the code say? From what I can tell the code doesn't say I cannot park trailers on a empty lot owned.

Parking prohibited. No trailer, other than major recreation equipment as determined in Section 158.217(e), enclosed utility trailer or open utility trailer, as defined herein may be parked or stored on any lot in a residential district unless said vehicle is stored inside a closed garage consisting of four walls and a roof.

Recreational vehicle. Every licensed vehicle and conveyance designed, used, or maintained primarily as a travel trailer, motor home, camper, boat and boat trailer, or other vehicle that is used for recreational purposes, trailer that is specifically manufactured and designed to carry such vehicle, or other trailer which is used to carry such vehicle, provided the owner thereof maintains proof of an operational, properly-titled recreational vehicle.

So what our code tells me that all boat trailers have to be parked inside a closed garage. So this is telling me every boat owner in PSL is in violation?

From what I am told I can park vehicles on this lot that are registered or is it against the code, and if so which code is it in violation?

From what I am I can tell no one reported this lot correct? Since my neighbors had parked their trailers on this lot I do not think they would have reported the lot.

That said, if the street creates a HOA and we make this lot the trailer storage lot then we don't need to put up a planted privacy fence? And we would be in compliance with the HOA rules.

Code Officer Knaggs 4/6/2018 All violations remain. Photos on server. Rk

Code Officer Knaggs 6/1/2018 The open storage remains (a trampoline, a lawn mower, a pile of pavers and a playhouse). I sent an email to the owner explaining this. All other violations have been complied. Photos on server. Rk

Code Officer Knaggs 6/1/2018 Mr. Greenberg,

I went by the property and found some items still being stored on the vacant lot (the trampoline, the playhouse, a large pile of pavers, and a lawn mower). Unfortunately because this property in question is an unimproved property and does not have a structure on it,

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nothing can be stored on this property at any time. Children's toys, a barbecue grill and patio furniture are permitted on properties with a fully-enclosed building (for example, a home). Thank you for complying with the other violations, but at this time, I am unable to close the case. If the violations are corrected before the hearing (June 6, 2018), please contact me so that I may conduct another inspection. If you have any questions, please feel free to contact me.

Greenberg On May 29, 2018, at 7:21 AM, Jared Greenberg <greenberg.jared@gmail.com> wrote:

Hello Rachel,

I have moved all the items that are in the notice. I noticed the court date is June 6. Let me know if this is still on or have the issues on the lot been addressed?

--

Sincerely,

Jared Greenberg

<Notice of Hearing 4_18_2018.pdf>

Code Officer Biehl 6/4/2018 On Jun 1, 2018, at 3:25 PM, Aaron Biehl <ABiehl@cityofpsl.com> wrote:

Mr. Greenberg,

I understand your issue with the lawn mower, however this case has been going on since February 14th, 2018 and as the violation remains we have no recourse but to move forward to the Magistrate to possibly obtain a date certain for compliance. At this time a hearing is set for June 6th, 2018. At that hearing you may explain your position on the ordinance. The Special Magistrate is an impartial magistrate that is there to listen to both sides and adjudicate a finding based on the testimony and facts presented by both parties. Please bring any information with you that you like the Magistrate to be aware of.

Thank you,

Aaron Biehl

Code Compliance Supervisor / Nuisance Abatement Coordinator

Greenberg From: Jared Greenberg <greenberg.jared@gmail.com>

Sent: Friday, June 1, 2018 11:38 AM

To: Rachel Knaggs <rknaggs@cityofpsl.com>

Cc: Emily Greenberg <dremilygreenberg@gmail.com>; Aaron Biehl <ABiehl@cityofpsl.com>

Subject: Re: Court date

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The lawnmower steering broke and new part has been ordered so the mower will be gone once the part get in. As for as the other items, I cannot find where in the code it says items cannot be stored on the lot if there in not a primary structure. Please provide it.

Code Officer Padro 6/8/2018 Violator Jared Greenberg was present to hearing and was given 45 days to correct all violations on the property. SM stated that because there is a public streetway between both properties, a unity of title could not be granted. Setting for COF 08/01/2018. NU

Code Officer Knaggs 7/12/2018 Spoke with Aaron regarding email. He stated that no response is necessary due to the Special Magistrate explaining in depth to the owner regarding the open storage violation on the vacant lot. Rk

Greenberg 7/12/2018 On Jul 11, 2018, at 8:51 AM, Jared Greenberg <greenberg.jared@gmail.com> wrote:

Thank you for the clarification.

I just want to make sure I am to comply with a code that I am not in violation with! Since you have provided the code that I am in violation with where does it say in this code that you have to have a house on an empty lot? Where does it say I cannot story items on an empty lot? Please provide this information before the hearing date 8/1/2017.

Code Officer Biehl On Wed, Jul 11, 2018 at 8:04 AM Aaron Biehl <ABiehl@cityofpsl.com> wrote:

Good morning,

The notice you received is for a second hearing for the violation. This hearing is only advising you of the hearing date incase you fail to comply by the date the Magistrate provided.

Aaron Biehl

Code Compliance Supervisor / Nuisance Abatement Coordinator

Greenberg From: Jared Greenberg <greenberg.jared@gmail.com>

Sent: Monday, July 9, 2018 1:30 PM

To: Rachel Knaggs <rknaggs@cityofpsl.com>

Cc: Aaron Biehl <ABiehl@cityofpsl.com>; Emily Greenberg <dremilygreenberg@gmail.com>

Subject: Another 715 SW Abode Ave Violation notice

Hello Rachel,

I received this notice and would like to know what is it for? I cannot remove "158.211" If I do not know what it is about. I would assume you already know that the "trampoline, play house,

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and bench" which all will be removed in the correct amount of time per the first hearing on this matter. Which all items are all "designed for outdoor use in residential areas" per the code. Please let me know what I am in violation on this lot since I have no idea what I am in violation since this is the second notice I received.

Sincerely,
Jared Greenberg

Code Officer Biehl 7/18/2018
<ABiehl@cityofpsl.com> wrote:

On Jul 18, 2018, at 7:31 AM, Aaron Biehl

Good morning Mr. Greenberg,
Rachel's inspection is currently set for 07/22/2018, however as you are stating it is in compliance I can ask her to come out there today, however she is tied up this morning due to a Magistrate hearing. In regards to an appeal, who did you file the appeal with? To my knowledge no appeal has come across our desk as of yet. Reference to your question about where in the code does it state that a primary residence is required. At this point Code Compliance is going to refrain from responding to that question as you have mentioned that you have hired a lawyer and you have filed an appeal. As I explained Saturday when I met you at the property, the Magistrate is the party that ultimately decides if you are in violation or not after viewing our evidence and yours. In this case they ruled against you, at this point Code Compliance is just trying to verify that you are in compliance so we can close the case. If you have any questions please let me know.

Thanks,
Aaron Biehl
Code Compliance Supervisor / Nuisance Abatement Coordinator

Code Officer Knaggs 7/18/2018 Myself and Aaron Biehl went to the Property to inspect. All open storage has been removed, but no there is a trailer improperly parked on the vacant lot. Will open another case for the new violation. Photos on server. Rk

Greenberg 7/18/2018 From: Jared Greenberg <greenberg.jared@gmail.com>
Sent: Wednesday, July 18, 2018 7:16 AM
To: Rachel Knaggs <rknaggs@cityofpsl.com>; Aaron Biehl <ABiehl@cityofpsl.com>
Cc: dremilygreenberg@gmail.com <dr.emilygreenberg@gmail.com>;
Gary@brandenburgpa.com
Subject: 715 SW Abode Ave
Hello Rachel,

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715 SW Abode Avenue
Code Case #18-01490

I wanted to let you know that 715 SW Abode Ave is in compliance with the Judy Gary M. Brandenburg before July 21, 2018. Please see the photos below and please close this violation. However, I have filed an appeal on the following grounds: As I read the code that "I am in violation" of, see below. It says "This requirement shall not apply to patio furniture, grills, and other household items specifically designed for outdoor use in residential areas...." Where in this code does it say you have to have a house or primary residence and has to be a primary residence. I cannot see how I am in violation of this code as the code reads? It does not say "if you have an empty lot you cannot store items on it"? Where does it say this in this code? Please show me.

I think Judy Gary M. Brandenburg did not read the code as the code is written. If we are in violation of this code please show us where and how we are in violation?

?Sec. 158.211. - Storage or Accumulation of Materials, Refuse, and Waste Materials Prohibited.
?Except as may be expressly permitted within this chapter, no materials, refuse, and waste materials (including inoperable equipment and vehicles) shall be stored or accumulated outside of a fully-enclosed building within any zoning district. This requirement shall not apply to patio furniture, grills, and other household items specifically designed for outdoor use in residential areas or materials stored in an approved open/outside storage area within Industrial or Service Commercial zoning districts. This requirement also shall not apply to materials related to new construction, provided that all required permits have been obtained for that construction, and that all surplus materials and waste products shall be removed from the premises promptly upon completion of that construction. Inoperable vehicles may be parked in parking lots at vehicle repair businesses in the Service Commercial and Warehouse Industrial zoning districts for no longer than two weeks, provided the businesses have a current work order for the vehicle(s).

?(Ord. No. 98-84, § 1, 3-22-99; Ord. No. 00-11, § 1, 2-14-00; Ord. No. 15-85, § 1, 12-7-15)

History Exhibit "A"
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PHOTOS OF PROPERTY

