

Law Offices of
Jeffrey P. Siegel

P.O. Box 219 (USPS)
118 Tinker Street (Fed Ex or UPS)
Woodstock, NY 12498
Tel: (845) 679-2488
Fax: (845) 679-8074
Jeff@JPSiegel.com

August 27, 2018

Ellen Casciaro
Woodstock Building Inspector
Code Enforcement Officer
45 Comeau Drive
Woodstock, NY 12498

Re: The Lodge/20 Country Club Lane

Dear Ellen:

This office represents MHS Worldwide Holdings III, LLC, the owner of the property located at 20 Country Club Lane, Woodstock, NY and known as the "Lodge." As you know, this property is non-conforming non-complying commercial property and has grandfathered status under section 260-94 of the Town Zoning Code, as it pre-exists the enactment of the Town Zoning Code.

I am informed that the Town has issued a purported stop work order and has demanded that my client appear before the Planning Board, due to purported parking lot alteration, expansion and landscaping of an existing parking area. My client categorically denies all allegations of illegal activity. My client has not altered or expanded the parking lot. Rather he is making simple improvement to the surfacing and delineation of a long-existing parking area, as is common practice, and which does not require planning board review or approval.

Indeed, my client is prepared to offer numerous witnesses, including several prior owners and long-time guests/customers who are familiar with the configuration and use of the property going back decades, who will testify that the area in question has always been used for parking.

The notion that my client must apply for planning board approval of "landscaping" in this instance is overbroad and unenforceable. The planning board does not have such jurisdiction.

My client further informs me that there has been no change in the exterior lighting requiring a permit or planning board approval.

My client spent tens of thousands of dollars and significant time trying to get a site plan approved by the planning board, only to experience continuous additional demands, further delays and mounting expense. Finally he gave up and withdrew the application.

None of the work done at the property expands the capacity or permitted use of the Lodge, or is otherwise illegal or improper. Accordingly, my client demands that the stop work orders be immediately rescinded and that the town cease harassing his business that brings millions of dollars into our community. My client will sue the Town if this selective enforcement and baseless harassment does not cease immediately.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'J. Siegel', written in a cursive style.

Jeffrey P. Siegel, Esq.

cc: Bill McKenna, Town Supervisor