



ATTORNEY AT LAW

Stan Brown, Esq.

Stan Derwin Brown Law Office, LLC
1300 Caraway Court, Suite 101 • Largo, Maryland 20774-5462
Telephone: 301.883.8888 • Fax: 301.883.8606
Website: StanBrown.law
E-mail: attorney@StanBrown.law
Licensed in Maryland & Washington, D.C.

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Todd K. Pounds, Esq.
Alexander & Cleaver
6710 Oxon Hill Road, Suite 330
Oxon Hill, Maryland 20745

tpounds@alexander-cleaver.com

G. Macy Nelson, Esq.
Law Office of G. Macy Nelson, LLC
401 Washington Avenue, Suite 803
Towson, Maryland 21204

gmacynelson@gmacynelson.com

Thomas H. Haller, Esq.
Gibbs & Haller
1300 Caraway Court, Suite 102
Largo, Maryland 20774

thaller@gibbshaller.com

**Re: DSP-19045, Royal Farms store #213, northwest quadrant of I-495 / I-95 and
Greenbelt Rd., east of Walker Drive
March 22, 2021 District Council agenda**

Dear Gentlemen:

I understand that you represent various parties involved in the above-noted Detailed Site Plan application no. DSP-19045, concerning the applicant Two Farms, Inc. d/b/a Royal Farms.

Royal Farms' DSP-19045, for store #213, proposed near the intersection of Greenbelt Road and Walker Drive, may be on the District Council's oral argument hearing agenda for March 22, 2021.

I generally participate in all District Council oral argument hearings as a party in my capacity as *People's Zoning Counsel*. See County Code § 27- 139.01(c) (Powers & Duties). This letter is my full disclosure of the potential appearance of a conflict of

interest concerning my participation in any zoning cases concerning Two Farms, Inc. d/b/a Royal Farms.

Two Farms, Inc. t/a Royal Farms, store #356, is a long-term tenant on industrial property that I own located between the intersections of Pennsy Drive, Polk Street, Ardwick Place, and Ardwick-Ardmore Road in Landover, Maryland, *i.e.*, I am Royal Farm's landlord for this specific property, store #356. Royal Farms has commenced construction of its facilities on my industrial property.

I opine that I do not have any actual conflict of interest concerning DSP-19045, because a) I do not have any interest, financial or otherwise in any property or entity related to DSP-19045, b) I am not related to any party by affinity or consanguinity, c) I am not a decision-maker or fact-finder in the DSP-19045 zoning case, and d) I am able to participate in this DSP-19045 zoning case as a party without bias, partiality or prejudice.

Since I do not have any financial bias, personal bias or prejudgment bias, I intend to participate in the District Council oral argument hearings for DSP-19045 and I have filed the attached *Notice of Intention to Participate* with the Clerk of the Council.

Although I am not aware of any objections to my participation, if any person-of-record, attorney-of-record, or District Council member objects to my participation in this zoning case prior to the oral argument hearing, then the issue of recusal will be reconsidered prior to, or during, the oral argument hearing. Please advise me by telephone or email whether you want me to recuse myself from this zoning case.

This letter will be filed in the administrative file for DSP-19045.

Sincerely,



Stan Brown, Esq.

Peoples Zoning Counsel

cc

Rajesh A. Kumar, Esq.

David Warner, Esq.

Persons-of- record