



**ATTORNEY AT LAW**

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**February 6, 2023**

**Ms. Donna J. Brown  
Clerk of the Council  
Prince George's County District Council  
1301 McCormick Drive  
Upper Marlboro, Maryland 20774**

**DJBrown@co.pg.md.us**

**Re: SE-4846, Royal Farms store #393 (Hyattsville), 1821 East-West Highway  
February 13, 2023, District Council agenda**

Dear Madam Clerk:

I understand that various parties are involved in the above-noted Special Exception application no. SE-4846, concerning the applicant Two Farms, Inc. d/b/a RF East West Hyattsville, LLC t/a Royal Farms.

Royal Farms' SE-4846, for store #393, proposed on 1.90 acres, is located near the southwest quadrant of the intersection of East-West Highway (MD Route 410) and Riggs Road, and identified as 1821 East West Highway, Hyattsville, Maryland. SE-4846 may be on the District Council's oral argument hearing agenda for February 13, 2023. The applicant filed a *Notice of Withdrawal* on January 12, 2023, however, the District Council must take action on the matter.

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 at 8211 Ardwick Ardmore Road, 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.

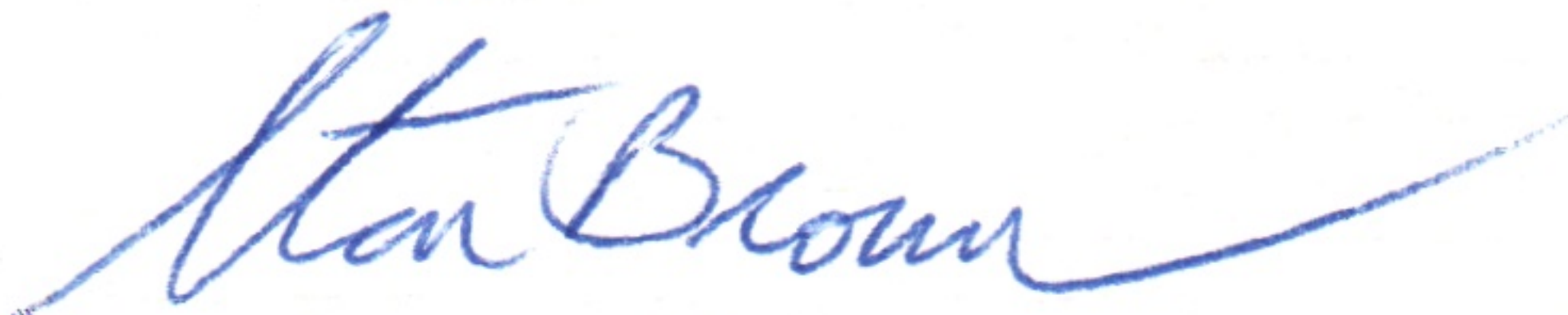
I opine that I do not have any actual conflict of interest concerning pending SE-4846, because a) I do not have any interest, financial or otherwise in any property or entity related to SE-4846, b) I am not related to any party by affinity or consanguinity, c) I am not a decision-maker or fact-finder in the SE-4846 zoning case, and d) I am able to participate in this SE-4846 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 SE-4846 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, Zoning Hearing Examiner, 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 file this letter in the administrative file for SE-4846.

Sincerely,



Stan Brown, Esq.

**People's Zoning Counsel**

cc

Rajesh A. Kumar, Esq., Principal Counsel to District Council

David Warner, Esq., Planning Board Principal Counsel

Matthew C. Tedesco, Esq., Attorney for Applicant

Maurene E. McNeil, Zoning Hearing Examiner

Joyce B. Nichols, Zoning Hearing Examiner

All Persons-of-Record