
Sarah Dyer
21 Old Kents Hill Road
Readfield, ME 04355
(207) 632-7898
sarah.e.blanchard@gmail.com

Bonnie Harris
26 Old Kents Hill Road
Readfield, ME 04355
(207) 624-2980
bonnieharris51@gmail.com

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Chip Stephens, Code Enforcement Officer, Town of Readfield
Will Gagne Holmes, Chair, Board of Appeals, Town of Readfield
Kristin Collins, Preti Flaherty, Legal Counsel to the Town of Readfield

Dear Mr. Stephens et al,

We are writing regarding permits granted to Robert Bittar and work on his property at 25 Old Kents Hill Road. Our homes are direct neighbors and across the street to his property. Since he purchased 25 Old Kents Hill Road in August 2022, Bittar has publicly and privately proposed a number of illegal uses of this property. We believe his permit applications are submitted in an effort to intentionally deceive the town of his true plans for the property. We believe the work he has performed to date demonstrates this.

On July 31, 2022 Sarah Dyer received an email from someone who was at a gathering with Bittar. He reported that Bittar repeatedly said he planned to throw lots of loud parties at 25 Old Kents Hill Road. Bittar also told him that he had not been successful with his project on Mill Stream Road and that he intended to pursue similar activities at his new property. He stated that Bittar intended to use the property as a means of harassing the Dyer family.

In December 2022, while pursuing his current permit, Bittar asked Code Enforcement about gatherings of 50-60 people and discussed and submitted drawings of proposed parking changes that violate conditions of the land use ordinance related to allowable uses in the Village Residential zone. He also proposed a generic "Home Occupation" use for the property. Additionally, in documents that he provided Sarah Dyer's attorney, Bittar indicated that he planned to turn 25 Old Kents Hill Road into a museum about "Pioneer and Indian Trading." In his December 14, 2022 correspondence with the Town, Bittar indicated that he intends to use the property as a political headquarters.

Museums, frequent large gatherings of people; commercial or otherwise, and community centers/clubs are not permitted in the Village Residential zone. After testing the fences about these ideas with the Code Enforcement Officer, Bittar ultimately submitted a permit application that could gain approval, omitting his intended uses. These intended uses to which he is now converting his property to accommodate violate the Land Use Ordinance and are designed to punish his neighbors.

Bittar has a documented history of omitting and obfuscating key information on permit applications. With his property at 21 Mill Stream, Bittar was issued numerous stop work orders and land use violations which were ultimately upheld in the courts due to his falsifications. The Town has an obligation to provide additional scrutiny to any land use application received from Bittar.

On his December 2022 permit application, Bittar indicated a plan to pour 2" of concrete in a 12 x 24 portion of his barn to repair cracks. He may have done so, but he also had a concrete pad poured under an open canopy in the rear of his barn. Despite a permit to "repair garage walls" Bittar has knocked out walls and installed large windows in the barn and in the former canopy area. Just two weeks after receiving his building permit Bittar obtained a plumbing permit to install a bathroom in the barn. He has taken out both garage doors and framed them up to be solid walls. Bittar's activity is clearly inconsistent with and exceeds the scope of his permit and constitutes a change in use from a garage or outbuilding to something consistent with his intent for the building to be occupied by a large number of people on a regular basis.

Permit applications are required to include a written description of the project and estimated cost. Bittar's written description includes two lines that indicate plans to incorporate parking, with no cost or design plan provided. There is also no schedule of construction provided as required. The permit was issued after-the-fact as there was a concrete truck in the yard before you were requested to investigate. Bittar knew the requirements for permitting due to years of botched projects, but ignored them.

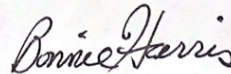
In the past, Bittar has declared to the Town that he will use his property as a single-family residential use and then actively pursued illegal uses. Bittar has not given his new neighbors or the Town any reason to believe that he will act differently this time, and in fact has already started down the same path of deception and violation. In addition to formally requesting an Appeal of both his building and plumbing permits, we are asking the Town to consider the following corrective and preventative measures:

1. A stop work order for 25 Old Kents Hill Road based on the exceedance of the permitted work and falsification of his permit
2. A notice of violation for the unpermitted work and change in use
3. A consent agreement between the town and Bittar that acknowledges the violations and appropriately limits the use of the property to prevent further land use violations.

Sincerely,



Sarah Dyer



Bonnie Harris