

Luke Purvis, being over the age of eighteen years and a resident of the State of Vermont hereby state as follows:

1. I make this statement from my own personal knowledge.
2. My name is Luke Purvis.
3. I am in Virginia for a family event and will be in Virginia on 7/20, the date of the scheduled DRB meeting.
4. The internet bandwidth on the farm where I am staying has impacted the video and audio internet streams of my work meetings so far this week such that I must use cellular data to effectively communicate in meetings.
5. I strongly wish to participate and present my request for a simple fence permit preferably in person or over a video stream if hybrid meetings have not been implemented.
6. The city, the party opposing my permit has access to video streaming for this DRB appeal which in places me in an inequitable position.
7. I have requested a continuance for this DRB item from Scott Gustin as soon as I identified this bandwidth issue on 7/12 through the City Permitting system.
8. Even, if video streaming were available where I am, I would need to request a continuance.
9. The city did not deliver important information and analysis. In an email from 7/8 city attorney Kim Sturtevant indicated that she would be responding 'next week' to my request for clarification regarding a central topic in this permit appeal. As of 7/16 16:00, I have not this received this response. This response is of critical importance as it is the clarification regarding the scope of the litigation stemming from the Code Enforcement Letter of Notification dated 1/29/2015.
10. Without that response I am unable to effectively prepare for this appeal or to voluntarily return my property into zoning compliance as it relates to the litigation stemming from 1/29/2015 Notification letter.
11. Many many attempts to ask for clarity regarding the scope of the litigation stemming from that Notification Letter made to Principal Planner Gustin and Attorney Sturtevant have been ignored or the fundamental question not addressed since April 2021.
12. Legitimate questions about definitions have not been answered. Dozens of emails to Scott, Kim, Bill Ward asking for the definition of 'parking' as it relates to the prior litigation have been ignored or not addressed. The goals of these emails was to bring my property to compliance as per the zoning litigation order and to not have to appeal a fence permit to the DRB.
13. The Code Enforcement Decision and the DRB decision stemming from the 1/29/2015 Notification letter indicate the complaint was 'Unfounded'. My requests to understand what 'unfounded' means in terms of the use violation of parking vs what 'unfounded' means when applied to a complaint about the underlying structure have not been addressed. 'Unfounded' clearly means very different things when applied to a use violation vs a structure violation.
14. Without clarification, I am unable to bring my property to compliance.
15. The city code enforcement notes in the AMANDA system and the research conducted by Jeanne Francis and Ted Miles is necessary to demonstrate the scope of the litigation stemming from 1/29/2015 Notification letter.
16. Scott Gustin, project manager on this appeal ignored my request for Code Enforcement Research documentation made on 7/1 in the New Permit Documentation system until 7/14, -after I left for Virginia. I am not able to retrieve these documents prior to 7/20. Access to this information will demonstrate that previous 'parking' litigation in this area was about a single use and not about the underlying structure.

17. Two independent affidavits confirm the gravel structure existed in the late 1960s. Other affidavits confirm the existence of the structure through 70s, 80s, and 90s. The gravel structure is plainly visible in the orthophotos from 1999 through current.
18. The AMANDA City documentation system contains multiple notes confirming the 15 year continuous existence of this structure.
19. 1972 is the year Scott Gustin informed coverage requirements where defined in the CDO.
20. Zoning and Code enforcement Staff for the city of Burlington have been notified about the repair of cars at my property since 1968 as demonstrated by the entry in the permit log from 1968.
21. My family is the only party harmed by this request for continuance as it only increases the length of time until we are able to install a fence to address safety, privacy and security considerations where we live especially for our child and dog.
22. For all these reasons, I request a continuance.

Fauquier County
 Court LT 7/16/21

DATED at Fauquier, this 16 day of July 2021.

Luke Purvis
 Luke Purvis

STATE OF Virginia
Fauquier COUNTY, SS.

Subscribed and sworn to by Luke Purvis, identified or known personally to me, at Fauquier Court, 16 this 16 day of July 2021.



Before me, [Signature]
 Notary Public

My Commission Expires: 09/30/2023