

March 12, 2020

Mayor & Commissioners of the City of Rehoboth Beach
c/o Ms. Ann Womack, City Secretary
Rehoboth Beach City Hall
229 Rehoboth Avenue
Rehoboth Beach, DE 19971



Re: Notice of Appeal - Site Plan Review Application No. 0620-03 - Clear Space Theatre

Dear Mayor and Commissioners:

Pursuant to the Rehoboth Beach Site Plan Review Code (“Code”) §236-35, this letter is a Notice of Appeal to the Mayor and Commissioners of the City of Rehoboth Beach (“M&C”) by the below 63 appellants (“Appellants”) of the decision of the Rehoboth Beach Planning Commission (“RBPC”), made on February 26, 2021 (“the Decision”), as a final action, to approve, with certain conditions, the above site plan application No. 0620-03 (“the Application”), filed by Clear Space Theatre (CST) for a performing arts theater.¹

In a closely related site plan review case, the RBPC also made a Decision on February 26, 2021, as a final action, to approve, with certain conditions, a site plan Application, also No. 0620-03, filed by CST, for a building, called Rehoboth Spotlight (“RS”), to be located immediately adjacent to the proposed CST theater. The Appellants have this day filed a separate Notice of Appeal of the RS Decision pursuant to Code §236-35.

Although both CST and RS filed two separate Applications, a single public hearing was held on January 29, 2021;² the RBPC treated them both under the same Application No. 0620-03; and the Decisions for CST and RS were virtually identical for both site plans. Notwithstanding that we are filing separate Notices of Appeal for each case, our use of the singular terms “Application,” “Decision,” “public hearing,” and similar terms may apply to either one or both such “Applications,” “Decisions,” or public hearings, as the context allows.

In §236-35 regarding appeals of site plan decisions made by the RBPC, the City incorporated the appeal standard in §236-6A regarding appeals of subdivisions decisions. Accordingly:

If any person shall be aggrieved by the final action of the Planning Commission, an appeal of the entire final action of the Planning Commission in writing to the Commissioners may be taken within 10 days after the date of the final action of the Planning Commission by filing with the Commissioners a written notice of appeal consisting of a general statement of the ground for appeal and the grounds upon which the person filing the appeal believes they have been aggrieved.

The general statement of the grounds for appeal of the Application filed by CST and as approved in the Decision are the following (some of which may overlap in some instances), all of which support the conclusion that the process used by the RBPC and substantive merits of the Decision were improper.

1

The CST Application was previously approved by the RBPC on August 14, 2020, which approval was appealed by a group of City residents and property owners, and was remanded on procedural grounds to the RBPC by the M&C for rehearing and decision.

2

Unless specified otherwise, references in this document to the “public hearing” refer to the RBPC’s public hearing that began on January 29, 2021 and continued on February 12, 2021 public hearing with respect to the Application. The previous public hearing, which was held on August 14, 2020, resulted in a reversal by the Mayor and Commissioners of the RBPC’s Decision that was based on that public hearing. The RBPC specifically stated that it was including as part of the record for the February 12, 2021 continued public hearing the information that was provided at or was already in the record as of the August 14, 2020 public hearing – and the inclusion of some of that information constitutes legal error and also supports the grounds for this appeal.

Preliminarily, Appellants note that a number of RBPC members and others made comments before, during and after the public hearing, including at RBPC meetings, that some of the “process” claims made by opponents of the Application should be rejected or even ignored because the RBPC should focus on the “merits” of the Application.

Needless to say, regardless of the merits – and we will show in this situation that the merits were wrongly decided – a decision made by the RBPC cannot stand if the process used violated the applicable ordinance (including any applicable statutory requirements) or violated due process standards.

Just as an applicant is entitled to have the RBPC make a decision based on the proper legal process, so too are opponents entitled to a decision based on the proper legal process – especially when many property, privacy and other personal rights of such opponents will be adversely affected, as here. We urge the M&C not to gloss over these procedural rights.

1. The Decision of the RBPC was a final decision that was not reasonable, was not the result of an orderly, logical and thorough review of the evidence, did not involve a proper interpretation and application of the applicable provisions of the Code, and did not comply with State statutory standards, ordinances of the City, and federal and State due process standards. More specific grounds are stated below.
2. The Application filed by CST failed to contain all the information required by §236-32C(1)-C(26).
3. The Application considered by the RBPC, and approved in the Decision, was **not** the final application that the Applicant sought to have approved. In fact, the Applicant had submitted to the Building Inspector an amended site plan, with material changes that affected the hotly contested Gross Floor Area (“GFA”) calculations and other important aspects of the project, but that amended application was never provided to the RBPC and never posted online or otherwise made available to the public. For several months the RBPC held preliminary reviews and public hearings on an application that was **not** the amended application, and the public never had a chance to review or comment upon the amended application. Yet the Applicant’s testimony was actually based on the amended application, while the public’s testimony was based on a non-final non-amended application. Nonetheless, when the RBPC first learned of this discrepancy on February 26, 2021, it refused to even ask to see the amended application and instead voted that very same day to approve an application that was really no longer “active” because it had been replaced by the amended but unseen application. These actions violated several provisions of the Site Plan Review Code as well as due process.
4. The RBPC’s conduct of the “public hearing” in January and its deliberations in February 2021 was contrary to the standards for “public hearings” that apply in these situations, even during COVID-19. Some of the specific instances of improper conduct of the “public hearing” by the RBPC are set forth below.
5. Prior to the public hearing on August 14, 2020, and contrary to the ordinance process and due process, several members of the RBPC made individual visits to the CST site and engaged in communications with representatives of the Applicant. The then Chair of the RBPC rejected proposals to “cure” these improper activities by conducting a formal visit to the site by all members of the RBPC. However, the information obtained and the impressions created in the minds of these Commissioners from their visits was ex parte, and affected their individual votes at the RBPC’s August 14, 2020 meeting, as well as their votes at the RBPC’s February 26, 2021 meeting, because none of the Commissioners ever affirmatively disclaimed using the information and mental impressions gained from these improper site visits in reaching their individual votes at either of the RBPC meetings.
6. Prior to the conduct of the public hearing, and contrary to the ordinance process, the RBPC had improperly decided – based on the then-current City Building Inspector’s determination and complete deference to that determination – that the CST site plans were “code-compliant,” *i.e.*, that the plans complied with all applicable provisions of the City Zoning Code.

7. Prior to the conduct of the public hearing, and contrary to both the ordinance process and due process, the RBPC improperly decided that the CST site plans was “code-compliant,” i.e., that the plan complied with all applicable provisions of the City Zoning Code.
8. In January 2021, a member of the RBPC improperly and privately contacted an expert on acoustical issues who had been engaged by nearby neighbors, interrogated this expert about his expert opinions on the noise issues involved in the CST site plan review, and obtained a copy of the confidential report the expert was preparing for those neighbors to be used in an upcoming confidential mediation and at the public hearing on the Application. This conduct had a materially adverse impact on the presentation of testimony by such neighbors on the noise issue, in violation of standards for public hearings required by both ordinances and due process (sometimes the standards required by ordinances and due process are hereafter referenced as “the standards for public hearings in 8 above”).
9. Notwithstanding that the above acoustical expert’s work product was confidential, was intended to be used only in the scheduled mediation in this case and as the basis of his testimony and such neighbors’ testimony in the public hearing, the RBPC member provided the expert’s work product to the other members of the RBPC, in violation of the standards for public hearings in 8 above.
10. In addition to the above actions in 8 and 9 above, and even after arguments from the above neighbors, the Chair of the RBPC caused the above acoustical expert’s work product to be posted on the City’s document center, where it became available to the public and to the Applicant, in further violation of the standards in 8 above.
11. One of the neighbors who had engaged the acoustical expert reported the actions of the RBPC member in a formal complaint to the State Public Integrity Commission (“PIC”), in which he asked the PIC to find that the RBPC member had engaged in behavior contrary to the state Code of Conduct and that the RBPC member should recuse herself or be disqualified from any further participation in the CST site plan hearing and approval process. However, before the PIC issued its findings and conclusions on this issue, the RBPC member declined to recuse herself at the February 12, 2021 RBPC meeting at which the Application was deliberated and the RBPC refused to prohibit her participation, and so instead she actively participated throughout those deliberations, including offering comments to fellow RBPC members about the noise issue that was the subject of the acoustical expert’s work product that she obtained, as well as comments on the proposed conditions in the draft Decision that are discussed below. These actions were in violation of the standards for public hearings in 8 above.
12. At the continuation of the public hearing of the CST site plan on February 12, 2021, members of the RBPC considered and discussed potential conditions contained in a memo prepared for all RBPC members by one of those members, and the RBPC repeatedly solicited comments and information from the Applicant about whether the conditions under consideration in that memo would be acceptable to the Applicant. Although the RBPC Chair repeatedly stated at the beginning of the February 12, 2021 public hearing that the “record” in this case had “closed” on February 5, 2021 and no further evidence could be presented by anyone, including any opponents, in fact the responses from the Applicant to questions about the conditions under consideration constituted new evidence that the RBPC accepted as part of the record and relied upon in making the Decision. These actions were in violation of the standards for public hearings in 8 above.
13. At the continuation of the public hearing of the CST site plan on February 12, 2021, although the RBPC solicited and relied upon information from the Applicant, it refused to allow members of the public, particularly opponents, to offer comments and information (on February 12 or anytime thereafter, including at the February 26 RBPC meeting) or rebut new information provided by the Applicant. These actions were in violation of the standards for public hearings in 8 above, and also in violation of the right of opponents (including some Appellants) to equal protection.
14. The City Solicitor was serving as counsel to the RBPC throughout its consideration of the Application, and even previously when the Applicant’s initial application was filed prior to 2020. At least since October 6, 2020,

some of the Appellants asked that the City Solicitor no longer represent the RBPC in the matter because of due process violations associated with his “wearing multiple hats” (counsel for Building Inspector in this matter; counsel for RBPC in this matter; counsel for M&C in this matter at least to the extent he drafted a proposed ordinance that would have eliminated parking requirements for), but he has refused to do so and the RBPC has refused to remove him from representing them in this matter. His role in this matter, which heavily influenced the Decision as many RBPC repeatedly stated, was in violation of the standards for public hearings in 8 above.

15. One of the Appellants filed with the RBPC on February 23, 2021, a “Motion to Terminate Participation of the Planning Commission Attorney,” asking that the City Solicitor no longer serve as counsel to the RBPC in this matter because such continued participation would violate the process required by ordinance and due process.³ The RBPC rejected that Motion and the City Solicitor refused to recuse himself, and his continued participation and advice in this matter was in violation of the standards for public hearings in 8 above.

16. The Applicant did not provide substantial evidence regarding whether the CST site plan complied with all the legally required factors in Code §236-30E(1) to E(21), and thus the RBPC did not adequately consider these factors in reaching its Decision.

17. The Applicant did not provide substantial evidence regarding whether the CST site plan complied with the general purposes of the site plan review process in §236-30D(1) to D(4), and thus the RBPC did not adequately consider these site plan purposes in reaching its Decision.

18. The Applicant did not provide substantial evidence regarding whether the CST site plan complied with the requirements of the City’s 2010 Comprehensive Development Plan (“CDP”), and thus the RBPC did not adequately consider the CDP requirements in reaching its Decision. Indeed, the Decision is contrary to the CDP.

19. The Applicant did not provide substantial evidence regarding whether the CST site plan complied with all applicable requirements of the City’s Zoning Code, and in any event the RBPC did not adequately consider zoning requirements in reaching its Decision because it improperly deferred to the Building Inspector.

³ Because of the importance of this due process violation, in addition to the above general statement about it, we provide the following details so that the M&C will see that strong facts underly this claim: Even apart from the reasons discussed in 12 above for disqualifying the City Solicitor in this matter, this Appellant’s Motion stated that beginning on or about January 29, 2021, the City Solicitor had engaged in conduct that consisted of wrongfully accusing that Appellant of criminal conduct for disclosing the above PIC complaint (which this Appellant had filed with the PIC); stating that Appellant could be subject to as much as one year in prison and a fine of \$10,000 for disclosing the above PIC complaint; asserting that Appellant had “damaged” the “reputation” of a RBPC member and had put her “employment” in “jeopardy” in regard to the above PIC complaint. The accusations of criminal conduct were made to that Appellant within an hour before he was to testify on January 29, 2021, and he stated that the City Solicitor’s conduct had rattled and terrified him right before his testimony. That Appellant also alleged that the City Solicitor reiterated those accusations against him to one or more RBPC members who were deliberating in this proceeding. **That Appellant also stated that before these accusations were made to him and others, the PIC legal counsel had advised the City Solicitor that Appellant’s disclosure of the PIC complaint was allowable, violated no criminal or other law, and was protected by the First Amendment – nonetheless, the City Solicitor acted towards Appellant as stated above.** Further, the City Solicitor advised the Appellant that if he would withdraw his PIC complaint, then the affected RBPC member might not pursue criminal or civil actions against him. When the Appellant would not withdraw his PIC complaint, the City Solicitor advised the RBPC Chair that the confidential work product of that Appellant’s acoustics expert should be made public on the City’s public portal, and the City Solicitor advised the affected RBPC member that she did not need to recuse herself – all to the detriment of the Appellant.

20. The Applicant failed to establish that the structure to be built on the allegedly “single” large lot, i.e., the main CST theatre, has a GFA of less than 15,000 square feet. Indeed, the RBPC admitted that the Application it had reviewed and approved contained old, un-amended drawings with a different measurement.⁴ In fact, the uncontradicted and only substantial evidence was that the GFA calculation of the structure, whether as set forth in the old, un-amended drawings or in the updated drawings (unseen, but “described”), actually exceeds 15,000 square feet GFA. As a result, this structure requires on-site parking as set forth in the Zoning Code.

21. The Applicant failed to establish that the three lots on which the two CST/RS buildings will be located have not been legally merged pursuant to Delaware law and the City ordinances. In fact, the uncontradicted and only substantial evidence is that these lots were merged into one lot and have never been “un-merged”. Because the two structures on this merged lot collectively far exceed 15,000 square feet GFA, on site-parking is required by the City Zoning Code.

22. The Applicant failed to establish that the three lots on which the two CST/RS buildings will be located are not under common ownership and/or control. In fact, the uncontradicted and only substantial evidence is that these lots are under common ownership and/or control, and therefore because the structures collectively far exceed 15,000 square feet GFA, on site-parking is required by the City Zoning Code.

23. Instead of making findings on these and other Zoning Code issues, the Decision improperly delegated to the City Building Inspector – who was advised by the City Solicitor, in his conflicting roles – RBPC’s statutory obligation to make the final determination as to whether the CST site plan complies with all applicable requirements of the City’s Zoning Code.

24. In response to objections by the Applicant, the RBPC also wrongly failed to include in the Decision specific conditions that would require the Applicant to take actions that would address numerous substantive deficiencies in its site plan regarding noise, lighting, building use, building design, traffic and parking. Most of the “conditions” adopted in the Decision are essentially subjective and/or determinable by the Applicant alone; indeed, the RBPC majority rejected motions to create more objective and precise conditions that would be subject to subsequent City review and approval prior to issuance of any Certificate of Occupancy. Accordingly, it was arbitrary and otherwise illegal to approve the Application with such “conditions.”

25. More specifically, in response to objections by the Applicant, the RBPC wrongly failed to include various conditions involving structural changes proposed by the acoustical expert engaged by neighbors that would be minimally necessary to protect the neighbors from noise to be generated by the CST theater. Indeed, the noise “level” to which the theatre is to be built was found by the acoustical expert to be unreasonably low and even within the margin of error for noise measuring devices.

26. In response to objections by the Applicant, the RBPC wrongly failed to include various conditions that would protect nearby neighbors from noise and other adverse impacts by limiting CST performances to specific hours; limiting service of food and alcohol to certain times and designated locations within and outside the CST theatre; and limiting rentals of the CST theatre to outside groups, especially those involving rock concerts or other loud events.

27. The RBPC determined which conditions to impose related to noise based solely on the decibel level in the City’s noise ordinance, thus ignoring the other non-decibel requirements in the noise ordinance.

⁴ The RBPC actually admitted that CST’s theatre might exceed 15,000 square feet GFA, but that if that is the case, the Applicant can simply “reduce” the GFA to drop below 15,000 square feet when the GFA is properly calculated **after** the Decision approving the Application. This is a novel and illegal concept: to approve an incorrect application and allow that application to be modified to meet the Zoning Code after the application has already been approved!

28. In response to objections by the Applicant, the RBPC wrongly failed to include conditions relating to use of the CST building that would prohibit "office space," "Education-Related Services," or a café.
29. In response to objections by the Applicant, the RBPC wrongly failed to include conditions relating to traffic that would require the Applicant to provide a specific traffic and parking mitigation plan, subject to the reasonable approval of the City Manager or the RBPC or other City official, prior to obtaining a Certificate of Occupancy.
30. In response to objections by the Applicant, the RBPC wrongly failed to include conditions relating to traffic that would require the Applicant to use print and other media to direct patrons to alternate means of transportation to access the CST theater, including use of private vehicles to carpool and parking only in areas in commercial zones and in City parking lots.
31. In response to objections by the Applicant, the RBPC wrongly failed to include conditions relating to parking that would require the Applicant to submit to the City prior to obtaining a Certificate of Occupancy license agreements or the equivalent contractual commitments to secure parking spaces with direct access to Rehoboth Avenue or to the sidewalks leading to Rehoboth Avenue equal to the number of parking spaces required by the City Zoning Code for a theater with a gross floor area in excess of 15,000 square feet.
32. The Decision approving the Application was clearly the product of extensive negotiations with the Applicant, and not the product of independent findings and conclusions by the RBPC.
33. The Decision approving the Application was also arbitrary and capricious in that it was not supported by substantial record evidence.

The general statement of the grounds upon which the Appellants filing this appeal believe they have been aggrieved are as follows (at least one Appellant falls into one of the grounds below; some Appellants fall into more than one of the grounds below; and each ground below includes at least two or more Appellants):

1. Several Appellants own and/or reside on properties that are immediately adjacent to the land on which CST seeks to build its theater, and as a result of the Decision, these Appellants believe that they will be adversely affected by, among other things: additional noise; additional artificial light at night; reduced natural light during the day; additional traffic and associated safety and back-up problems on streets/circle that they regularly use (as drivers, bicyclists or pedestrians) on a daily basis when residing in their properties; additional parking problems on their streets, including right in front of their properties; invasion of privacy due to inadequate screening; the lack of protection for the architectural massing, composition, scale, and character of their neighborhood; the incompatibility of the new construction with the existing scale and character of nearby properties; the lack of preservation of streetscapes; drainage and/or stormwater problems; and decreased property values. Among the appellants covered by this paragraph are Janice Miller, Chad Sensenig, Robert Lauder and John Swift.
2. Several Appellants own and/or reside on nearby properties that are within 1,000 feet of the land on which CST seeks to build its theater. The RBPC itself asked that CST reach out to and meet with such persons within 1,000 feet to discuss the potential impact of its theater on those persons, and suggestions for minimizing problems for those persons. As a result of the Decision, these Appellants believe that they will be adversely affected by, among other things: additional noise; additional light; additional traffic and associated safety and back-up problems on streets/circle that they regularly use (as drivers, bicyclists or pedestrians) on a daily basis when residing in their properties; additional parking problems on their streets, including right in front of their properties; the lack of protection for the architectural massing, composition, scale, and character of their neighborhood; the incompatibility of the new construction with the existing scale and character of nearby properties; the lack of preservation of streetscapes; drainage and/or stormwater problems; and decreased property values. Among the appellants covered by this paragraph are Linda Pickle, Ruth Eisenberg, Harvey Shulman and Nan Hunter.

3. Several Appellants own and/or reside on nearby properties that are less than approximately one-half mile of the land on which CST seeks to build its theater. As a result of the Decision, these Appellants believe that they will be adversely affected by, among other things: additional traffic and associated safety and back-up problems on streets/circle that they regularly use (as drivers, bicyclists or pedestrians) on a daily basis when residing in their properties; lack of protection for the architectural massing, composition, scale, and character of their neighborhood by the property; the incompatibility of the new construction with the existing scale and character of nearby properties; the lack of preservation of streetscapes near the property. Among the appellants covered by this paragraph are Andrea Hoffman, Paull Hubbard, Gail Richards, James Eskew, Thomas Evans and John Hughes.

4. All of the Appellants are property owners and/or residents in Rehoboth Beach entitled by law to participate in site plan review public hearings, and the City's site plan procedures (especially in regard to public hearings) have been established to protect their interests – particularly in connection with the additional traffic and associated safety and back-up problems on streets/circle that they regularly use (as drivers, bicyclists or pedestrians) on a daily basis when residing in their properties; and in connection with their other interests stated above (for Appellants within 1,000 feet or about one-half mile of the CST theater). As a result of the Decision, which was arrived at as the result of the RBPC's process which did not comply with applicable law, all of the Appellants believe they have been injured by such procedures and thus have procedural injury standing.

Further, please note that as permitted by the Code, Appellants intend to submit a written submission no later than 21 days before the date set by the Commissioners for the M&C appeal hearing, and also an additional written submission (i.e., reply) no later than seven days before such date, or at such later times as the Commissioners may allow for the parties to the appeal to file such submissions.

Because there are numerous Appellants in this matter, we have set up a Liaison Group to which the City can send all future communications on this matter. All members of this Liaison Group should receive at the same time by email (at their email addresses below) any future communications, and the City will receive a response from the person in the Liaison Group who have been selected to respond to each communication. This will make it easier for the City to communicate with Appellants on this matter. We will advise you of the names and contact information for the members of the Liaison Group.

Finally, please find attached a check for the \$150 appeal fee.

Respectfully submitted,

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PAID

ck # 388 \$ 150.⁰⁰
 Amex 3/12/21