LAW OFFICES OF JAN SCHNEIDER
1133 Connecticut Avenue, N.W.
Washington, D.C. 20036
Telephone: (202) 457-0008; (202) 775-2377
Facsimile: (202) 833-8491; (202) 775-2369
E-Mail: janschne@ix.netcom.com

February 29, 2000

By Fax (202-727-4925)

Madeline H. Dobbins. Esq.
Director
Ms. Sharon Pruitt
Secretary
District of Columbia Board of Zoning Adjustment
441 4th Street, N.W., Suite 210
Washington, D.C. 20001

Re: Application Lynne M. Hornyak and Michael Petite
Application No. 16552
THE LAUREN, Square 115

Dear Ms. Dobbins and Ms.. Pruitt:

This is further to my letter of February 14, 2000 concerning the above-referenced application. That letter asked to be heard in opposition, but in case it was not totally clear, I am requesting party status in accordance with Section 3106.2 of the Board of Zoning Adjustment Rules of Practice and Procedure. Although all of the requisite information was contained in my previous letter, for the record, the reasons may be stated according to the specific subdivisions of Section 3106.2 as follows:

(a) I am Jan Schneider, 1301 20th Street, N.W., Unit 1011, Washington, D.C. 20036, (202) 429-9157.

(b) I hereby request leave to appear and participate as a party in Application No. 16552 by Lynne M. Hornyak and Michael Petite, relating to units in The Lauren, 1301 20th Street, N.W., Washington, D.C. 20036.

(c) I will appear as an opponent of the application.

(d) I wish to be a party. Since I am also counsel admitted to practice in the District of Columbia, please consider me in this capacity as well. My office address is Law Offices of Jan Schneider, 1133 Connecticut Avenue, N.W., Suite 1000, Washington, D.C. 20036, (202) 457-0008.

(e) As indicated in my previous letter, I was a party in opposition to the prior applications by the same applicants to use the same Lauren units for the same

#30

Board of Zoning Adjustment
District of Columbia
CASE NO.16552
EXHIBIT NO.30

purposes. *See D.C. Board of Zoning Adjustment, Applications Nos. 15030-46, 15207, 15246, 15249, 15332, 15377 & 14418.* Dr. Petite's was Application No. 15035 and Dr. Hornyak's No. 15040. I was also an intervenor and counsel in the two consolidated appeals which upheld the BZA decision to deny these two applications, among others, for Special Exceptions. *See Gage v. District of Columbia Board of Zoning Adjustment*, Nos. 96-AA-1519 & 97-AA-237 (D.C. Ct. App., filed Oct. 14, 1999). Additional reasons why I should be granted party status include the following:

1. I own unit 1011 in The Lauren, which is my primary (and only residence). As demonstrated in the record of the multi-year course of the prior proceedings on these applications, owners and residents in the same building are unquestionably affected by the presence of mental health (and other) offices, in at least two basic respects: (a) serious detriment to the peace, safety and good order of the building, with mental health patients (and/or other commercial visitors) permitted to gain free access to the building and to transit, utilize and occupy the lobby, hallways, elevators and other common elements with impunity; and (b) diminished property values, among other reasons due to the decreased attractiveness and security of the building for residential purposes, the added expenses and condominium fees caused by the vastly increased traffic in the building, and the failure of mortgages on residential units in The Lauren to qualify for resale on the secondary mortgage market pursuant to Fannie Mae and Freddie Mac owner-occupancy restrictions.

2. As already indicated, I am both an owner and resident of a unit in The Lauren, Unit 1011 on the tenth floor

3. To repeat, my unit is in the same building as the two units the subjects of the application.

4. Please see #1 supra, as well as the record in the prior BZA proceedings and *Gage supra*.

5. Please see my letter of February 14, 2000 concerning this application.

Thank you for your attention to this matter.

Sincerely,

Jan Schneider