GOVERNMENT OF THE DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT

Application No. 16619 of Romano Romani and Thomas D. Parry, pursuant to 11 DCMR Section 3103.2 and 330.5, for a variance from the use provisions to allow the premises to be used as general office space (a lobbyist group) in an R-4 District at premises 233 Constitution Avenue, N.E., (Square 758, Lot 39)

APPLCIANT'S APPEAL OF FINAL DECISION

Comes Now, Romane Romani and Thomas D. Parry, by and through undersigned Counsel, Andrea Merritt Bagwell, Harmon, Wilmot & Brown, LLP and hereby respectfully files this Appeal of Final Decision based on the foregoing circumstances:

1. The Application was brought by Romano Romani and Thomas, through undersigned counsel, and sought a variance from the use provisions to allow the premises to be used as general office space (a lobbyist group) in an R-4 District at premises 233 Constitution Avenue, N.E., (Square 758, Lot 39).

2. A hearing was originally scheduled for November 8, 2000 but the Board granted the Applicant's request for a continuance and the hearing was rescheduled for February 13, 2001.

3. On January 7, 2001, Mr. Thomas Parry, Managing and Founding Partner of Parry, Romani & Deconcini, Inc., Applicant, unexpectedly died at the age of fifty-three (53) leaving behind a wife and four minor children.

4. Prior to Mr. Parry's death, he owned an undivided one-half interest in the real estate located at 233 Constitution Avenue, N.E., which is used by the lobbying business for its offices.

5. Mr. Parry was also part owner of the corporation that operates the lobbying practice.

6. Both the interest in the real estate and the business passed to Mr. Parry's estate and the sole legatee is his wife, Mrs. Nancy Parry.

7. Probate proceedings were filed in the state of Virginia, where the deceased resided, and in the District of Columbia, where the property was located, by the law firm of Sucker, Spaeder, Goldstein, Taylor & Lilker, LLP, in representation of Mrs. Parry.

8. The parties sought a valuation of the assets through a comprehensive review of all financial information.

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9. An Appraiser was retained to determine the value of the property.

10. The Attorneys involved in the Probate Matter provided written statements to the Board as the current legal status of the estate cases, in Virginia and the District of Columbia. An important representation by the Attorneys in the Probate Matter was that they expected the estate cases to be resolved by September 2001.

11. In effect, the property that is the subject of this Application is tied up in a complex estate proceeding that will ultimately determine both the ownership rights and the future use of the subject property.

12. The undersigned counsel therefore represented a prudent course of action for the Board of Zoning Adjustment would have been for the Board to continue the matter so as to allow a resolution of the estate matter.

13. The February 13, 2001 hearing was again rescheduled with the Board's approval due to the death of Mr. Thomas D. Parry, one of the principal partners and founders of the lobbying firm, until May 15, 2001.

14. The Applicant, through counsel appeared before the Board on May 15, 2001 to request a third continuance due to fact that the property in question was involved in a complicated estate proceeding following the death of Mr. Parry.

15. At the May 15, 2001 hearing, the Capital Hill Restoration Society and Ellen Chafee, interested parties, agreed to a further continuance to such time as the estate issues were fully resolved and therefore permitting the Board to make a final determination as to the merits of the case.

16. The Board of Zoning Adjustment Dismissed the Application at the May 15th proceeding and issued a Final Order on July 12, 2001 that was not forwarded by the Board of Zoning Adjustment to the Applicant's Attorney of Record, pursuant to 11 DCMR Section 3125.9.

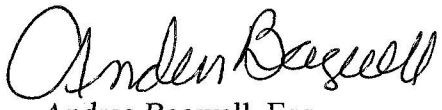
17. Upon receipt of the Final Order from the Applicant, the Attorney of record immediately filed an Appeal of Final Order and respectfully prays that based on the foregoing, the Board will Reconsider its Final Order and conduct a Hearing on the aforementioned matter.

18. The relief sought, a variance, can be granted without substantial detriment to the public good and without substantially impairing the intent, purpose and integrity of the regulations and map.

19. In light of the circumstances, the variance could be justified based on the minimal effect that Parry, Romani & Deconci has on the community, vehicular, pedestrian, as well as the peace, order and quiet of the surrounding area.

20. Pursuant to District of Columbia Municipal Regulation 3102, a new Hearing is being sought to Appeal the Final Order. Moreover, there is new evidence which could not reasonable have been presented at the May 15, 2001 hearing.

Sincerely,



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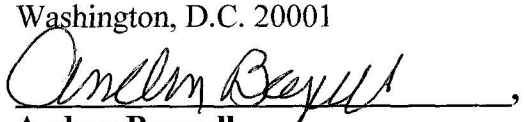
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