

**BZA 21467: Paramount Estate Limited Liability Company
2201 R Street, NW (Sq. 2516, Lots 65 and 66)**

Affidavit of Scott Purcell

I, Scott Purcell, being duly sworn, depose and state as follows:

1. I am an Associate Broker at Long & Foster Real Estate, Inc. I have been a real estate broker for 20 years, specializing in the sale and marketing of high-value residential properties in the District of Columbia, including the Kalorama, Embassy Row, and Dupont Circle neighborhoods. Over the course of my career, I have facilitated over 400 transactions and have extensive experience advising owners of large-scale residential properties on market conditions, buyer demand, and highest-and-best-use considerations.
2. Before the Owner, Paramount Estate Limited Liability Company, acquired the property located at 2201 R Street, NW (Sq. 2516, Lots 65 and 66) (the "Property"), the Property was owned by the Embassy of Pakistan.
3. In 2021, the Embassy of Pakistan engaged me as its agent to list and market the Property for sale. Due to its significantly deteriorated condition, deferred maintenance, and outdated building systems, the Property was in need of a complete gut renovation. The scope of work required to restore the Property to a habitable single-family residence would have been extensive and cost-prohibitive relative to comparable single-family homes in the area. Based on my familiarity with renovation costs and resale values in the Kalorama neighborhood, I believe the investment required to convert the Property into a code-compliant, market-ready single-family residence would substantially exceed the price that such a home could command upon resale in the current market, rendering single-family use economically infeasible.
4. I listed the Property for sale and broadly marketed it through the Multiple Listing Service (MLS), direct outreach to qualified buyers and brokers, and other customary marketing channels. The listing described the Property as a unique neo-classical residence in the Kalorama section of Northwest Washington and included photographs documenting the condition of the Property. The listing did not restrict or limit the Property to any particular use, and was open to buyers interested in single-family, multifamily, embassy, or institutional uses.
5. I coordinated multiple tours with potential buyers to walk through the Property and discuss their concerns and desires for the Property. Despite the broad marketing effort and unrestricted listing, every offer received sought to redevelop the Property for multifamily residential use. No prospective buyer expressed interest in acquiring or using the Property as a single-family home, embassy, or any other by-right use. To my knowledge, no inquiries were received from any party interested in single-family residential use of the Property at any price.

6. Based on my 20 years of experience in the Washington, D.C. real estate market, and considering the condition, size, layout, and configuration of the Property, as well as the cost of renovation, prevailing market conditions, and current buyer demand trends in the Kalorama neighborhood, I believe that it would have been extremely challenging—if not impossible—to find a potential buyer seeking to acquire and use the Property as a single-family home or embassy at the listed price, or at any price that would yield a reasonable rate of return. The Property's floor plan, scale, and infrastructure are far better suited to multifamily residential use, and the market has consistently reflected that reality. Moreover, the renovated single-family homes in the immediate vicinity that have sold in recent years are significantly smaller in scale and did not require the magnitude of structural rehabilitation that this Property demands, making those sales unsuitable as benchmarks for a viable single-family return on this Property. As such, the Embassy of Pakistan carefully reviewed the offers received, all of which contemplated redevelopment of the Property for multifamily residential use, and closed with the Owner.
7. Accordingly, based on the foregoing, I believe that the unique conditions of the Property—including its deteriorated state, the scale and configuration of the building, the cost of renovation, and the complete absence of any market interest in single-family or by-right use—create undue hardship for the Owner to comply with the Zoning Regulations, as the Property would not be reasonably adapted for a single-family residential use or any other by-right use.

[signature and notary on following page]

I solemnly affirm under the penalty of perjury that the contents of this Affidavit are true and correct to the best of my personal knowledge.

Scott Purcell,

By: Scott Purcell
Name:
Title:

_____))
_____) ss:
_____)

Sworn and subscribed to (or affirmed) before me this 30th day of April, 2026,
by Scott Purcell as Associate Broker at Long & Foster Real Estate, Inc.

Jesus S. Camacho
Notary Public Signature

Printed Name: Jesus S. Camacho

My commission expires: 3-31-2030

[Notary seal]

