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October 9, 2018

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Certified By The Supreme Court Of New Jersey:
*Civil Trial Law
**Workers' Compensation Law
***Matrimonial Law

Sent Via NJ Lawyer Service

Theodore H. Ritter, Esquire
The Ritter Law Office, LLC
55 Fayette Street
PO Box 320
Bridgeton, NJ 08302

RE: Land Use Application
Property Address: 66 and 75 Peace Lane, Block 88, Lots 11, 12 and 16
Our File No. 62192(22)

Dear Mr. Ritter:

As you know I represent William Martin, the owner of property adjacent to 66 and 75 Peace Lane, Hopewell. I am writing to you as you are the municipal solicitor. In light of your prior letter and the disclosed conflict, I would ask that you please forward this correspondence to whoever will act as conflict counsel for the municipality.

For whoever is reading this, by way of background, there was an application for a use variance filed by Brigit Brust and Jamie Gordon back in February of 2018. At such time, the applicants indicated to be the owners of 66 Peace Lane, Block 88, Lot 16 and the contract buyers of 75 Peace Lane, Lots 11 and 12. The owner of Lots 11 and 12 was B. Jean Riley. The attorney who represented Ms. Riley with the sale of her property was Bob Pryor, Esquire who is counsel for the zoning board. As a result of the conflict, Bill Horner, Esquire was brought in to represent the board. As part of his review, there were several concerns and questions which he raised, one of which was the lack of any site plan with the application. Almost immediately after Mr. Horner expressed his concerns with the application, an e-mail was circulated in which Mr. Pryor expressed a personal belief that he may not have a conflict following the sale. Within hours of Mr. Pryor's e-mail, the applicants sent an e-mail requesting that the application be adjourned until after the sale so that Mr. Pryor could then handle such. From our view point, this was clearly because the applicant was concerned that Mr. Horner would be tougher on their application and more thorough than Mr. Pryor. Thereafter, at the board's April hearing, Mr. Pryor advised the board that the next hearing on the application would not just be a completeness

review but a consideration on the entire application. It is unknown why or how Mr. Prior was providing such advice as the sale had not gone through and he was therefore still conflicted.

Since such time, Ms. Riley apparently sold her property to a Mr. David Wright and Thomas Longo, Jr. on July 24th. While it is not known why title was taken by these individuals, it is concerning that this information which is believed to have been known and/or learned by Mr. Pryor during his involvement in the sale of the property had not been fully disclosed to the board and/or the public as such had been requested in numerous OPRA Requests made by my client.

From the information that we have been able to ascertain, these individuals are business associates with Brigit Brust and Jamie Gordon who run a Philadelphia based realty investment company which operates as Harlow Grey. It appears that part of the business which they seem to employ is acquiring properties throughout New Jersey and then listing them on Airbnb and other marketing outlets for special events and overnight rentals. Such is exactly what these individuals have planned on doing from day one with respect to this property while acting as if this was a private residence that they would like to hold special events at on occasion. On their website this property is actually being marketed for rent and is indicated that the property has four bedrooms with seven beds and sleeps 14. (See documents attached). As I hope I do not need to inform you, such type of commercial establishment is not permitted in the agricultural zone. In my initial correspondence, I had indicated that construction work was believed to be ongoing which would have required permits and inspections. The response was that such will be looked into. If there is any update with regards to such, please advise and provide copies of any inspections or permits issued. I would hope that the municipality is very concerned as this property is being marketed and utilized as a hotel/motel/bed and breakfast/banquet facility despite their having been no approval for such use which is not permitted in the agricultural zone. Additionally, it should be very concerning for the safety of occupants in such a property which has not gone through a complete inspection to determine if it is compliant with modern building codes for electrical, fire safety and the like.

I also want to bring to your attention that in addition to these individuals simply ignoring the land use laws and requirements of building and housing codes, these investors have proven that they have no care about the environment as shown when their contractors were utilizing chippers to clear fallen trees and brush and were blowing such directly into the river. Additionally, these individuals have no respect or care towards my client's rights for peace and enjoyment with his property as demonstrated when they painted disgusting comments on the roof that were directed towards my client and visible to anyone, including minors, who would visit my client. While these individuals may get away with this in Philadelphia, which may simply look the other way and allow them to operate commercial facilities as the please, I would expect that Hopewell would undertake a serious investigation into this clearly illegal use and put an end to such. My client should not be in a position of having a commercial rental facility illegally operating right next door to his home and farm.

Furthermore, as indicated above, Hopewell should be very concerned with protecting the safety and welfare of any individuals who would stay at this location as it is doubtful that such complies with the rigorous housing standards for such facilities.

Lastly, I want to again raise my serious concerns as to what certain individuals who have been involved with such application on behalf of the municipality have known or have decided to blatantly ignore. Whatever the personal reasons for doing such are, it is clear that at a

minimum Mr. Pryor has a very real conflict as he has attempted to guide and assist these applicants through this process while having an actual conflict.

By copy of this correspondence I am notifying the zoning officer directly of this perceived violation and would request that immediate action be taken. By further copy I am also notifying the two groups who previously submitted objections to the application as it is believed they should be made aware of the current situation as well.

Thank you for your attention and consideration to the above.

Very truly yours,



FRANCIS J. BALLAK

FJB/ac

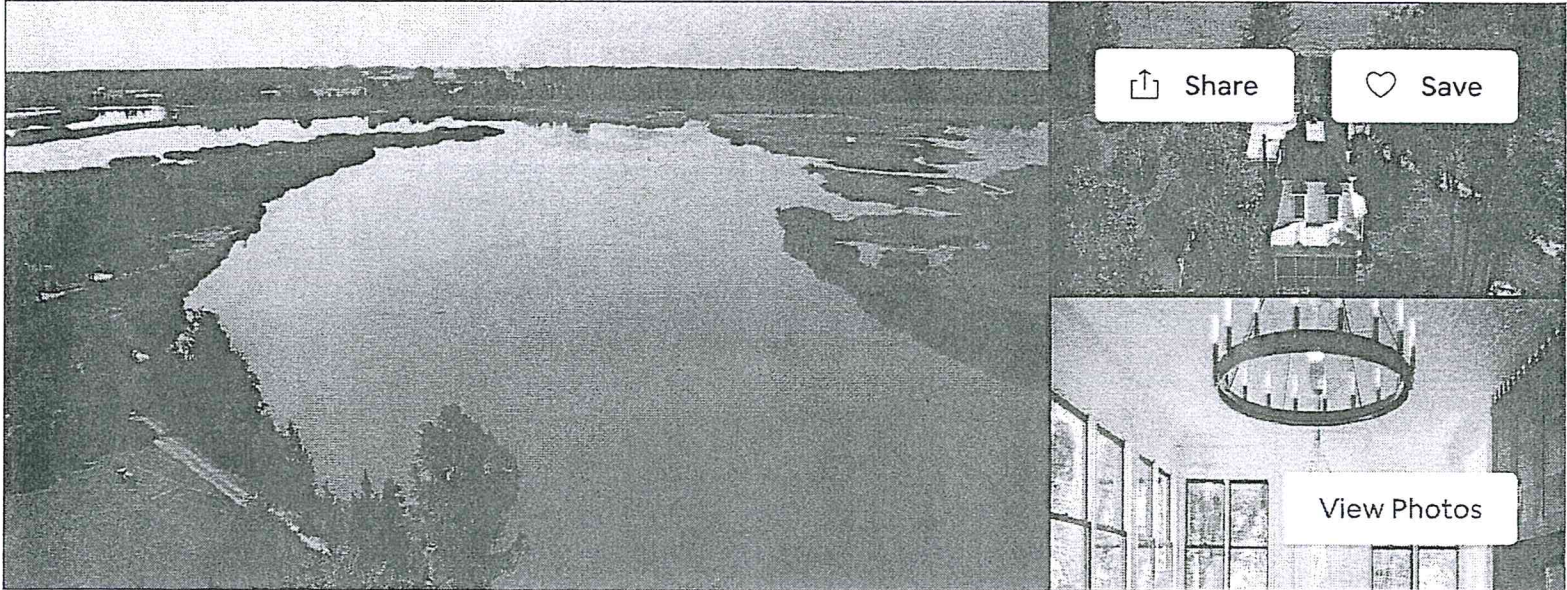
Enclosures

C: Will Martin

Gordon Gross, Hopewell Township Zoning Officer (Sent Via NJ Lawyer Service)

Cohansey Watershed Association

Hopewell Township Environmental Commission



ENTIRE HOUSE

The Townsend

Bridgeton



Jamie

10 guests 4 bedrooms 5 beds 3 baths

HOME HIGHLIGHTS

Jamie is a **Superhost** · Superhosts are experienced, highly rated hosts who are committed to providing great stays for guests.

Helpful · Not helpful

On the way to The Townsend, you'll pass roadside farmstands and wide open fields. This meticulously restored farmhouse, located on the Cohansey River, features waterfront views in every room in the house so you can unwind, reflect and enjoy the company of family and friends. Outside

you'll find a dock, firepit, and a large field, perfect for outdoor activities. A quick 3 mile drive takes you to the historic town of Greenwich, where you can grab a bite at our favorite lunch spot, Aunt Betty's.

Contact host

Amenities

-  Air conditioning
-  Indoor fireplace
-  Dryer
-  Heating
-  Essentials
-  Iron

Show all 22 amenities

Sleeping arrangements



Bedroom 1
1 queen bed



Bedroom 2
1 queen bed



Availability

Updated today



SuMoTuWeThFrSa

SuMoTuWeThFrSa

October 2018

November 2018

1 Review

 Search reviews

**JoJo**

September 2018

P

Beautiful property on the Cohanzick River. We got ready for our wedding day there. Everything is brand new but in an older house full of character. Jamie and the property managers were wonderful and very responsive. We'd definitely stay again, but next time bring a group of...

Read more

This host has 194 reviews for other properties.

[View other reviews](#)

Hosted by Jamie

Philadelphia, Pennsylvania, United States · Joined in January 2013

★ 200 Reviews  Verified



Jamie is a Superhost · Superhosts are experienced, highly rated hosts who are committed to providing great stays for guests.



We love good people, good food, and good properties! Keep up with us on Harlow Grey Homes for any upcoming projects!

Response rate: 100%

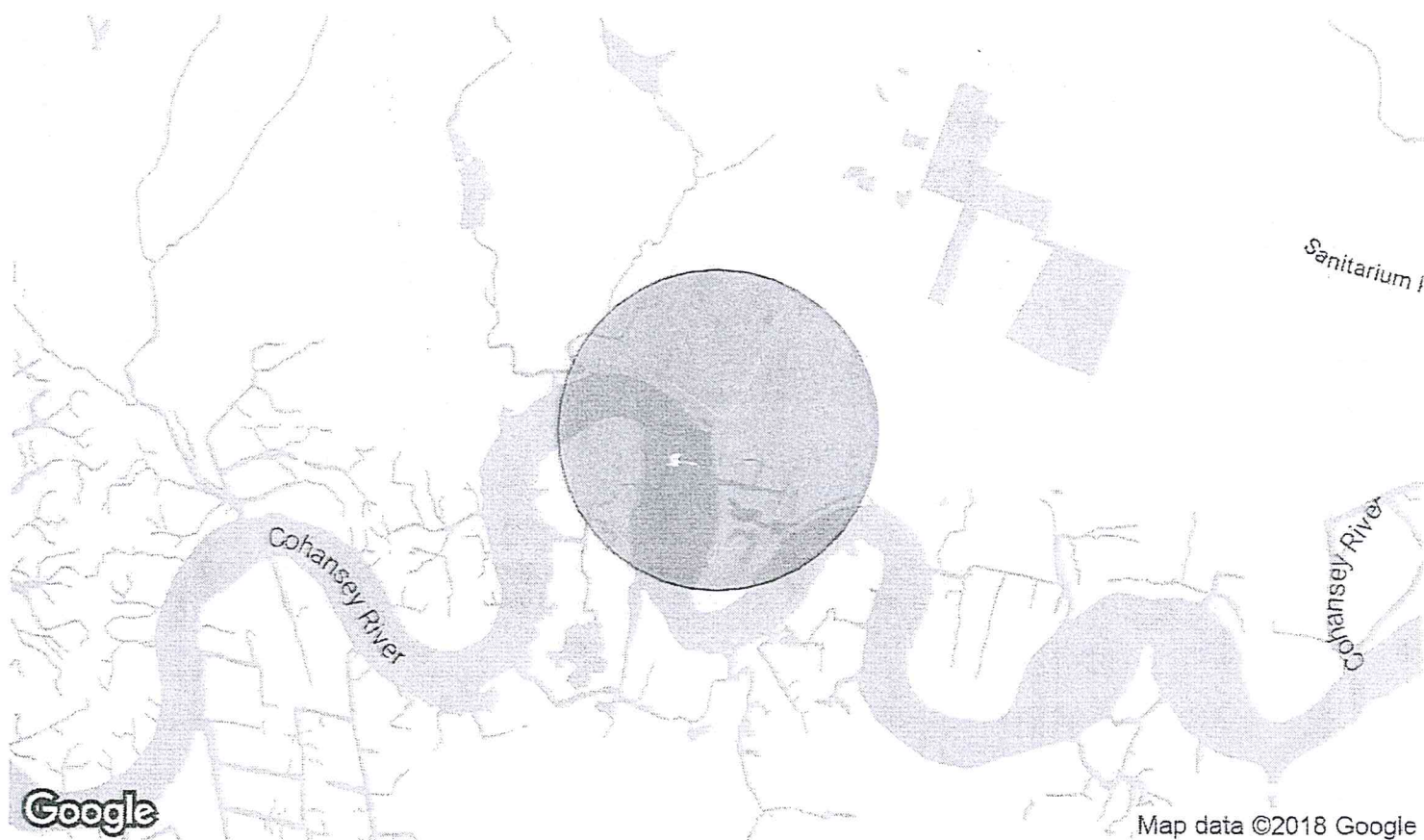
Response time: within an hour

Contact host

Always communicate through Airbnb · To protect your payment, never transfer money or communicate outside of the Airbnb website or app. [Learn more](#)

The neighborhood

Jamie's home is located in Bridgeton, New Jersey, United States.



Policies

House Rules

No smoking

No pets

Check out by 11AM

Cancellations

After that, cancel up to 7 days before check-in and get a 50% refund, minus the service fee.

Simplified Notation

\$430 per night

Exi

Bridgeton

Dates

More
Apé

Check in

→ Check out

miniums

Guests

Orlar
Wash
Philac
Weel
Astor
State
Anna
Sprin
New

1 guest

✓

3

New York
and City

Request to Book

1

; Grove
ise Point

You won't be charged yet

 Report this listing

beach, a network of guided nature trails, walking and wooded trails at Piney Point Woods, Mary Elmer Lake, playground areas, and tennis courts.

BEDROOMS

4

BEDS

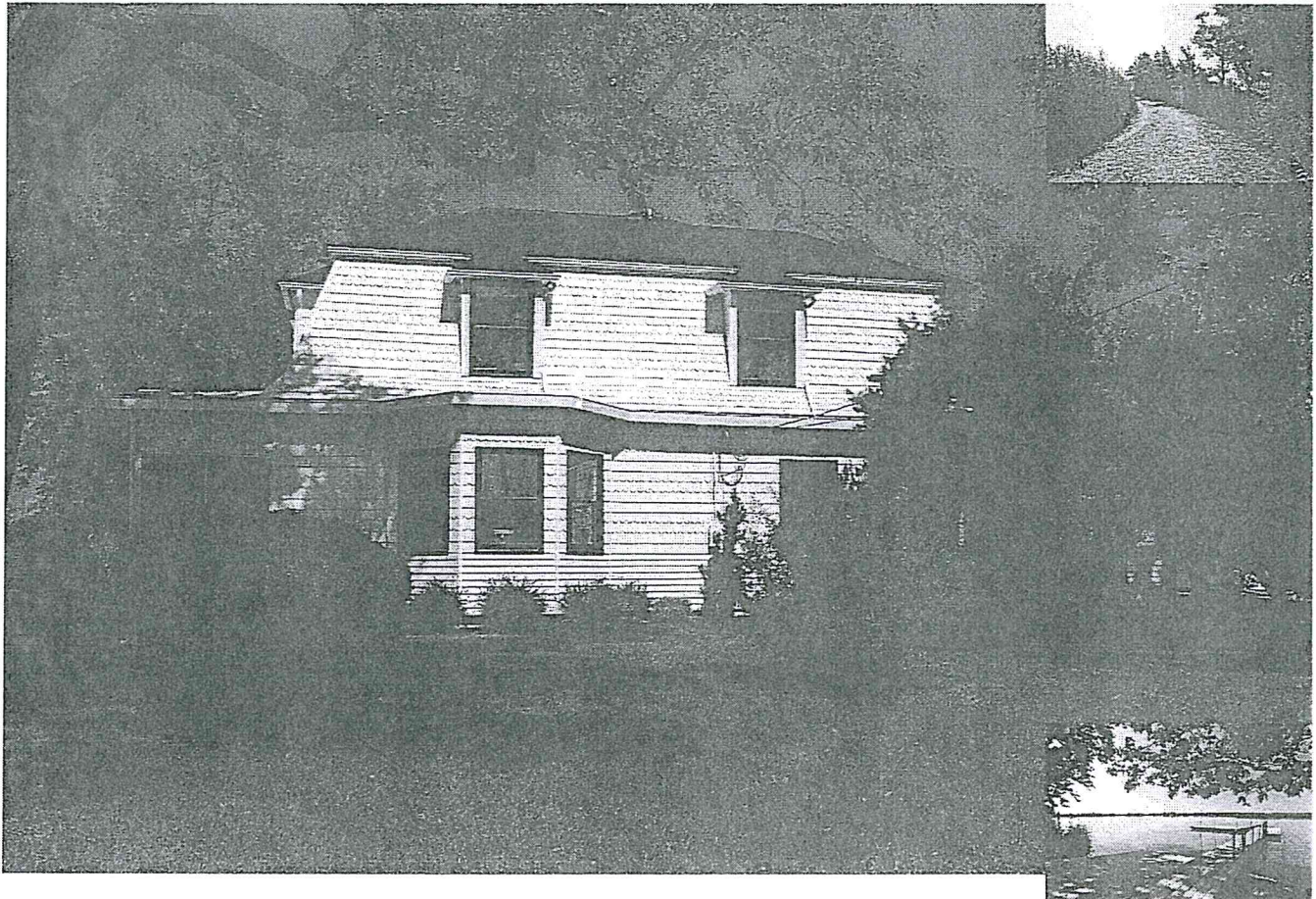
7

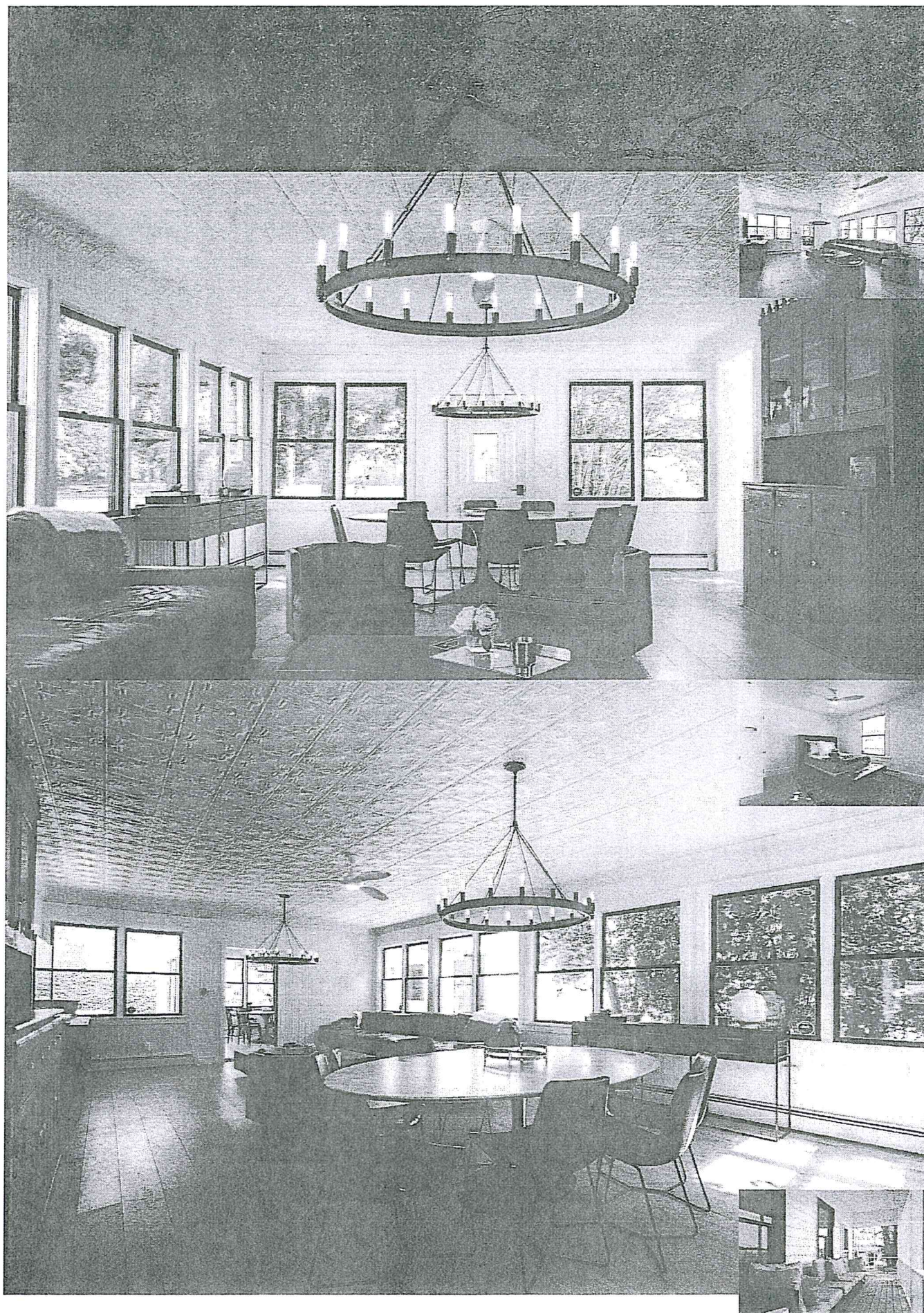
SLEEPS

14

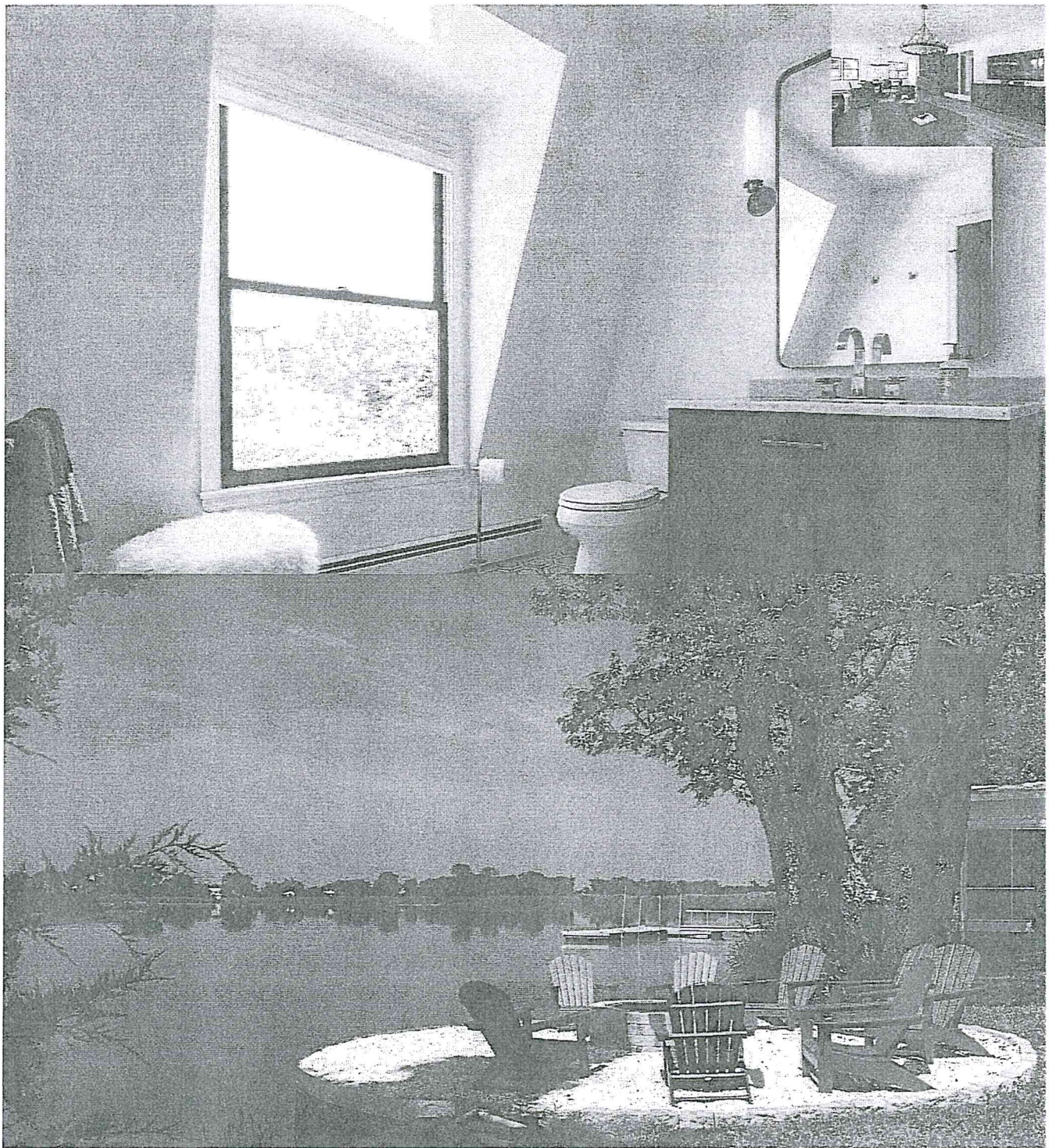
BATHROOMS

3









📞 267-971-7028

✉️ info@harlowgreyhomes.com

Search

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harlowgreyhomes Take us to the Farm! Meet our newest and largest addition to the family, The Townsend! She is officially our largest home situated alongside the Cohansey River in Bridgeton NJ. 5 acres of land and the perfect place to host a getaway weekend, a micro wedding, or a swanky Farm to table dinner party. Named for Mae Townsend Pease, we can't wait to share this leading lady's story. She may not be famous, but she is historic! 📷: @alcove_media

409 views

6 DAYS AGO

Log in to like or comment.

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Log in to see photos and videos from friends and discover other accounts you'll love.

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Sign Up