

Christopher T. Spadoni
Attorney at Law

5D

February 20, 2013

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Cynthia H. Biedenkopf, City Clerk
City of Bethlehem
10 East Church Street
Bethlehem PA 18018-6028

Re: Pennsylvania Venture Capital Inc. v. Zoning Hearing Board of the
City of Bethlehem

Dear City Clerk Biedenkopf:

Enclosed please find February 19, 2013 Attorney Malkames correspondence enclosing Zoning Appeal Notice of Appellant Pennsylvania Venture Capital Inc. Appealing the Decision of the Zoning Hearing Board of the City of Bethlehem dated January 24, 2013.

I request that this correspondence with enclosures be shared with Members of City Council and I am requesting direction from City Council as to the enclosed Appeal.

Thank you. Should questions arise or further information be required as to the enclosed, please contact this office.

Very truly yours,


Christopher T. Spadoni, Esq.

CTS: ks
Enclosure

cc: Members of Council
C Spadoni (letter only)

NOTE

SUBJECT: City Council Agenda
March 5, 2013
Communication 5 D
City Council Solicitor Memo dated February 20, 2013

The Attachments to Communication 5 D of the March 5, 2013 City Council Agenda are the following:

- Letter dated February 19, 2013 from Attorney Mark Malkames
- Zoning Appeal Notice – Page 1 Only

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MARK MALKAMES
WILLIAM KURT MALKAMES

February 19, 2013

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38 West Market Street
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Jeremy Clark, Esquire
Harry Newman & Associates, PC
3897 Adler Place #180C
Bethlehem, PA 18017

Re: **Pennsylvania Venture Capital, Inc. vs. Zoning Hearing**
Board of the City of Bethlehem

Dear Counselors:

I am enclosing for service upon you a copy of Appellant, Pennsylvania Venture Capital, Inc.'s Zoning Appeal Notice, together with a Praecipe entering my appearance for Appellant with respect to the above captioned matter, the originals of which I have filed with the Prothonotary of Northampton County.

Very truly yours,



Mark Malkames

MM/as

Enclosures

cc: Pennsylvania Venture Capital, Inc., w/enclosures, By Email
Greenhouse Development LP, w/enclosures, By Email

IN THE COURT OF COMMON PLEAS OF NORTHAMPTON COUNTY, PENNSYLVANIA
CIVIL DIVISION – LAW

PENNSYLVANIA VENTURE CAPITAL, INC.))	
1177 6 th STREET)	
WHITEHALL, PA 18052)	
)	No.
Appellant)	
)	
vs.)	
)	
ZONING HEARING BOARD OF THE)	ZONING APPEAL
CITY OF BETHLEHEM,)	
10 E. CHURCH STREET)	
BETHLEHEM, PA 18018)	
Appellee)	

ZONING APPEAL NOTICE

Appellant, Pennsylvania Venture Capital, Inc., Assignee of Greenhouse Development, LP, Owner, hereby appeals the Decision of the Zoning Hearing Board of the City of Bethlehem dated January 24, 2013, mailed January 24, 2013 (courtesy copy attached as Exhibit "A") pertaining to the property known as 2349 Linden Street, City of Bethlehem, Pennsylvania and states as follows:

1. Appellant is Pennsylvania Venture Capital, Inc., the assignee of property known as 2349 Linden Street in the City of Bethlehem, Northampton County, Pennsylvania (the "Property").
2. The owner of the Property is Greenhouse Development, LP who joins in the filing of this Appeal.
3. The within application was filed by Pennsylvania Venture Capital, Inc. with the authorization of the owner by mutual assignment of rights.
4. An application was filed by the Appellant with the Zoning Office of the City of Bethlehem to utilize the Property as a Residential Treatment Facility, the Property being located