

TOWN OF PARSONSFIELD
APPLICATION FOR AN ADMINISTRATIVE APPEAL
TO ZONING BOARD OF APPEALS

Name of Appellant Kezar Commons, LLC and Kezar Falls Millworx, LLC

Mailing Address P.O. Box 713

City or Town Parsonsfeld State Maine 04047

Telephone (207) 253-0532 Map/Lot U04/003

Email adixon@dwmlaw.com (Agnieszka A. Dixon, Esq., Legal Counsel)

Name of Owner Kezar Commons, LLC and Kezar Falls Millworx, LLC (Mark and Scott Mounce)

The undersigned requests that the Board of Appeals Consider this Administrative Appeal:

Relief from the decision, or lack of decision, of the Code Enforcement Officer or Planning Board in regard to an application for a permit. The undersigned believes that (check one):

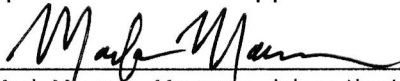
- An error was made in the denial of the permit
- The denial of the permit was based on a misinterpretation of the ordinance.
- There has been a failure to approve or deny the permit within a reasonable period of time.
- Other: An error was made in the approval of a permit and the approval was based on a misinterpretation of the ordinance.

Please explain in more details the facts surrounding this appeal (please attach a separate piece of paper.) You should be as specific as possible so that the Board of Appeals can give full consideration to your case.

Please see the attached memo.

Application for an administrative appeal shall be filed with the **Town Clerk**, who shall notify the Chairman of Board of Appeals. A \$100 Application Fee and \$150 Escrow Fee **MUST** be paid with this application. Additional funds may be required to complete the processing of this appeal.

I certify that the information contained in this application and its supplement is true and correct.

Date: February 7, 2025 Appellant Signature: 
Mark Mounce, Manager, duly authorized,
Kezar Commons, LLC and Kezar Falls Millworx, LLC

You will be contacted by the Chairman of the Appeals Board to schedule your hearing.

July 13, 2021

February 7, 2025

DELIVERY BY E-MAIL to dtaylor@parsonsfield.org

Town of Parsonsfield
Board of Appeals
634 North Road
Parsonsfield, ME 04047

**RE: Notice of Administrative Appeal of the Planning Board's Approval of
Gadomski Application**

Dear Members of the Parsonsfield Board of Appeals:

I represent Kezar Falls Millworx, LLC, the owner of the Robinson Mill property located at 10 Mill Street, and Kezar Commons, LLC, the owner of the Stanley Building property located at 14, 16, and 18 Federal Road (collectively, "KFM"). This memorandum, along with the enclosed materials, comprises KFM's administrative appeal of the Planning Board's January 8, 2025, decision approving an application submitted by Christopher Gadomski for a change of use of a building located at 24 Federal Road to a medical cannabis caregiver facility, adult use cannabis store, adult use cannabis products manufacturing facility, and adult use cannabis cultivation facility (Tier II) (collectively, the "Gadomski Application").

Concise Summary of the Issues on Appeal

The Planning Board erred when it, among other things, (1) deemed the Gadomski Application complete; (2) failed to publish in a newspaper of general circulation and mail to certain property owners the required notice of a public hearing; (3) failed to review the Gadomski Application against the relevant conditional use standards in the Zoning Ordinance; and (4) failed to make sufficient factual findings supporting their decision. Because the Planning Board erred as a matter of law and abused its discretion when it approved the Gadomski Application, and because the Planning Board's decision is not supported by substantial record evidence, we respectfully request that the Board of Appeals vacate the decision of the Planning Board.

We reserve the right to supplement this appeal application.

Very truly yours,



Agnieszka A. Dixon

Enclosures: Town of Parsonsfield Application for an Administrative Appeal
Sketch Plan
Application and Escrow Fees (\$250.00)

cc: Mark Mounce (via email)
Scott Mounce (via email)
Ben McCall, Esq. (via email)

Sketch Plan

