



September 13, 2022

To the Honorable Council
City of Norfolk, Virginia

Item Number: PH-2

Re: Ordinance Revoking a Conditional Use Permit previously granted to Legacy on August 24, 2021 by Ordinance No. 48,461, authorizing the operation of a nightclub at 216 East Plume Street

Dear Ladies and Gentlemen:

This agenda item is to revoke a conditional use permit previously granted to Legacy on August 24, 2021, by Ordinance No. 48,461, authorizing the operation of a nightclub on property located at 216 East Plume Street.

Respectfully,

Bernard A. Pishko
City Attorney

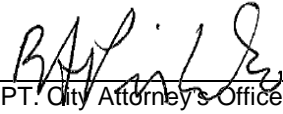
BAP:sb
Attachment

Form and Correctness Approved: *BAP*

Contents Approved:



By: _____
Office of the City Attorney



By: _____
DEPT. City Attorney's Office

NORFOLK, VIRGINIA

Ordinance No.

AN ORDINANCE REVOKING A CONDITIONAL USE PERMIT PREVIOUSLY GRANTED TO LEGACY ON AUGUST 24, 2021, BY ORDINANCE NO. 48,461, AUTHORIZING THE OPERATION OF A NIGHTCLUB ON PROPERTY LOCATED AT 216 EAST PLUME STREET.

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WHEREAS, the City of Norfolk has received complaints and identified issues concerning Legacy on property located at 216 East Plume Street and known as "Legacy";

WHEREAS, the appropriate City investigators and officers have investigated the complaints and have carefully reviewed the operations of said establishment;

WHEREAS, the City Council has received evidence that one or more of the conditions made part of the Conditional Use Permit granted by Ordinance No. 48,461, adopted August 24, 2021, have been violated; now therefore,

BE IT ORDAINED by the Council of the City of Norfolk:

Section 1:- That the Conditional Use Permit heretofore granted by Ordinance No. 48,461 is revoked, effective immediately.

Section 2:- That this ordinance shall be in effect from the date of its adoption.



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September 8, 2022

Via Facsimile (757) 644-4201

Katherine A. Taylor, Esq
Assistant City Attorney
810 Union Street
Suite 900
Norfolk, Virginia 23510

Re: Conditional Use Permit for Legacy @ 216 E. Plume Street
Public Hearing Date: 09/13/2022 7:00 pm

Dear Katherine:

Enclosed you will find:

(x) Letter of Representation

I ask that you:

(x) File

Thanking you for your assistance in this regard, I remain. . .

Very Truly Yours,

A handwritten signature in black ink, appearing to be 'JCM', written over a horizontal line.

Jeremy C. Mason, Esq.

JCM/mbf
Enclosure



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September 8, 2022

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Katherine A. Taylor, Esq.
Assistant City Attorney
810 Union Street, Suite 900
Norfolk, VA 23510

**Re: Conditional Use Permit for Legacy @ 216 E. Plume Street
Public Hearing Date: 9/13/22 7:00pm**

Dear Ms. Taylor:

Please be advised that I have been retained to represent the interest of *Legacy Investments LLC* in the above referenced matter.

I have been advised by one of the partners of this business that a public hearing is scheduled for 9/13/22 7:00pm.

Unfortunately, I'm not available this date and time. Moreover, my client is in the process of obtaining pertinent video footage from August 5th, 2022, in regard to the Statement of Proposed Revocation of Legacy, 216 E. Plume Street Conditional Use Permit.

Please view this letter as a request to continue the proposed date and time of this hearing to allow new council to adequately prepare prior to this matter being placed on the City Council Docket.

Thank you for your cooperation in this matter. Should you have any questions, please do not hesitate to contact my office.

Sincerely yours,

Jeremy C. Mason, Esq.

A handwritten signature in black ink, consisting of a large, stylized 'J' and 'M' that are intertwined, with a long horizontal stroke extending to the right.

JCM/mb