IN THE CHANCERY COURT OF BLEDSOE COUNTY, TENNESSEE

GREGGORY RIDLEY and wife, BECKY RIDLEY,	)	
Plaintiffs,	)	
v.	)	**Case No.:** 4CH1-2018-CV-3358
THE CITY OF PIKEVILLE, TENNESSEE, A municipal corporation, and THE PIKEVILLE ZONING BOARD OF APPEALS,	)	Filed 12-28-18 Time 8:45A m Clerk dd Greg Forgey Clerk & Master Bledsoe County, TN
Defendants.	)	

PETITION FOR WRIT OF CERTIORARI & COMPLAINT FOR INVERSE CONDEMNATION BY REGULATORY TAKING AND FOR VIOLATION OF THE TENNESSEE OPEN MEETINGS ACT

Comes now the Plaintiffs, **Gregg Ridley and wife, Becky Ridley**, by and through their attorney and would show unto this Honorable Court as follows:

JURISDICTION AND VENUE

1. The action for damages and compensation based on Defendants' wrongful regulatory taking of Plaintiffs' property, in violation of the Fifth Amendment to the Constitution of the United States of America, and in violation of the Tennessee Constitution Article. 1, § 21.
2. Venue in this Court is proper in that the Defendant is a municipal government located within Bledsoe County, Tennessee. The Plaintiffs are residents of Bledsoe County, Tennessee, and the real property at issue is located within the city limits of Pikeville, Bledsoe County, Tennessee.

3. The Plaintiffs have been aggrieved by the Pikeville City Council and Pikeville Zoning Board and are entitled to have the court review the zoning decisions pursuant to *T.C.A. § 27-9-101-102 et seq.*

THE PARTIES

4. At all times material to this suit, Plaintiffs, Gregg Ridley and Becky Ridley, owned real property in the City of Pikeville, Bledsoe County, Tennessee ("the Property"), more particularly described in ***Exhibit A***, a true and correct copy of which is attached to this complaint and incorporated herein by reference. Said property consists of 0.526 acres and is situated in a commercial area at the corner of East Railroad Avenue and Cumberland Avenue. Said property fronts the state's right-of-way on U.S. Hwy 127 bypass, a five-lane state highway.
5. The Defendant, the City of Pikeville, is a municipality created under the laws of the State of Tennessee. The City Alderman and City Mayor act as its governing body. The acts of the Defendant set forth below were performed under color of law. The acts and omissions alleged herein occurred and took place in the City of Pikeville, Tennessee, and the City and City Council (collectively, "Defendant" or "City") have their principal place of business in and conduct business at the Pikeville City Hall located at 25 Municipal Drive, Pikeville, Tennessee, 37367.
6. The Defendant, the Pikeville Zoning Board of Appeals, has its principal place of business in and conducts business at the Pikeville City Hall located at 25 Municipal Drive, Pikeville, Tennessee, 37367.

FACTUAL ALLEGATIONS

7. The Plaintiffs purchased the real property from Charles Bownds, M.D. on the 19th day of December, 2016. The Plaintiffs paid Thirty Thousand Dollars ($30,000.00) as consideration for the transfer of a warranty deed which was duly recorded on the 19th day of December, 2016, and is of reference in the Bledsoe County Register of Deeds Office in Book 308, Page 268.
8. The property was maintained by the former owner as an investment/rental property.
9. After the purchase of the property, the Plaintiffs invested an additional Five Thousand Dollars ($5,000.00) to get the property ready for commercial development. The Plaintiffs demolished the existing structures on the property, removed existing trees, and had the property excavated and leveled in a way to make it more attractive to potential commercial purchasers.
10. The area where the real property is situated is largely developed as a commercial section of the City. The following businesses are within a very close proximity of the real property and are also accessed off of East Railroad Avenue: Exxon Convenience Store, Dollar General, Farm Supply Store, Retail Rental Spaces, Heat and Air Contractor, State Farm Insurance Company, doctor offices, storage buildings, and Pikeville's largest electrical substation.
11. The Defendants have "spot zoned" the land adjoining the State Highway 127 bypass including the property at issue in this cause. Several properties located on State Highway 127 have been declared "residential," including but not limited to Subway. Additional properties that were previously used as commercial, including but not limited to the substation and Farm Supply Store, are now zoned as "residential" properties, whereas other

properties that were previously commercial, including but not limited to the storage buildings, McDonald's, Putnam-Reed Funeral Home, remain "commercial" properties per the current zoning map attached hereto and incorporated into this complaint as ***Exhibit B.***

12. The Plaintiffs' property is located on the corner of Cumberland Avenue and East Railroad Avenue which fronts the State right-of-way located within approximately fifty (50) feet of the U.S. 127 bypass. The Tennessee Department of Transportation's latest data indicates that 5,500 automobiles pass this intersection every 24 hours. Cumberland Avenue is a main entranceway from the 127 bypass to downtown Pikeville. Several existing businesses and Pikeville's largest electrical substation are currently located on East Railroad Avenue which creates a heavily traveled intersection not suitable for a residence. This property is bordered by three (3) city streets: Cumberland Avenue, East Railroad Avenue, and an unnamed 18-foot City Alleyway.

13. Only one (1) residential home remains on East Railroad Avenue at house number 72. Said residence is owned by Lisa Roberson Sherman, and if the home were removed, it could never again be used for residential purposes.[1]

14. The Plaintiffs have actively attempted to market and sell the property to commercial investors and businesses, including but not limited to Little Caesars Pizza Franchisee, River Valley Farm Credit, FirstBank, Mountain Valley Bank, Pikeville Dentistry, Hardees, and Victory Motors.

15. At the time the Plaintiffs purchased and developed the property and during the following year and 6 months, the Defendants did not have zoning or land use ordinances, and no other

[1] Ms. Sherman's property is currently grandfathered in as "residential." Should the home be torn down, the owner would not be allowed to construct a new home as the lot is too small to be residential and too small to be commercial per the *Zoning Ordinance of the City of Pikeville, Tennessee Chapter 4 – Section 401 and Section 402.*

zoning or land use laws were applicable to the property.

16. On or about the 29th day of June 2018, the Defendants adopted the new zoning and land use regulations/ordinances.

17. The Plaintiffs became aware of the Defendants' new zoning ordinances and the fact that the Defendants had zoned the Plaintiffs' property as residential around or about early September 2018.

18. Plaintiff, Gregg Ridley, attended the Zoning Board meeting on September 20, 2018, to inquire about the new zoning ordinance and request that his real property be changed from residential to commercial.

19. The Zoning Board members who were present at the September meeting included: Jimmy Pope, Ray Evans, Mayor Philip Cagle, Susan Bilbery, Jane Humble, and Kay Berkebile. The minutes of the meeting reflect that John David Sells was in attendance and absent from the September 20, 2018, meeting. These individuals hold themselves out as and have acted as the Pikeville Zoning Board/Pikeville Planning Commission.

20. The minutes of the Pikeville City Council meetings from February 8, 2016, and May 9, 2016, reflect the following people were appointed to serve on the Zoning Board/Planning Commission: Susan Bilbrey, Jimmy Pope, Rachel Bruning, Ray Evans, John Sells – At-Large Member, and Reed Sells. The minutes are incorporated herein and attached hereto as ***Exhibit C.***

21. No other minutes exist approving or confirming the appointments of the acting members. Kay Berkebile, Jane Humble, and Mayor Philip Cagle are acting in their individual capacity and holding themselves out to be zoning board members/planning commission members, but have never been legally appointed to serve in such capacity.

22. Members of the Pikeville Zoning Board of Appeals were not appointed by the legislative body in a manner consistent with the requirements set out in *T.C.A. § 13-7-205*. It is further alleged that the members of the Zoning Board who also serve as the Pikeville Planning Commission have not received the required training as set out in the above statute nor is it a proper board and as such, lacks any authority that is derived from the state statutes and therefore, has no authority to act or adopt zoning.

23. The Pikeville Zoning Board did not properly advertise the September 2018, public meeting consistent with the *Tennessee Open Meetings Act T.C.A. § 8-44-103* and the *Zoning Ordinance of the City of Pikeville, Tennessee Chapter 12 – Section 1207 (D)* attached hereto and incorporated herein as ***Exhibit D***. The Pikeville Zoning Board has at all times during the development and planning of the Comprehensive Zoning Plan held private meetings without any public advertisement of said meetings.[2] John Sells informed the Plaintiffs that, "some of the meetings concerning zoning plans have been held in private and some were open to the public."

24. The acting Zoning Board/Planning Commission has acted in their private meetings to make recommendations as to the adoption of new zoning ordinances to the Pikeville City Alderman and Mayor; such recommendations have been adopted by the Pikeville City Alderman and Mayor as existing zoning ordinances.

25. During the September 20, 2018, meeting of the Zoning Board/Planning Commission, board members made statements that, "some adjoining property owners in the area would not want the Plaintiffs' lot to be commercial as it would hurt their property values." The board members asked Mr. Ridley, "what he wanted to put on the lot." Mr. Ridley listed the

[2] The Planning Commission meetings were properly advertised during the year 2016 but no advertisements exist after 2016 during the discussion and development of the Zoning Plan.

aforementioned businesses which he had approached about purchasing the lot. Mayor Philip Cagle, an acting member of the board, said, "all the lots on the bypass were zoned wrong and all of them should be changed to commercial." The meeting was then abruptly adjourned without any action taken concerning the Plaintiffs' inquiry.

26. Immediately after the meeting adjourned, Zoning Board member, Ray Evans, told Mr. Ridley, "he had fought him in his bid for re-election as County Mayor and would continue to fight him in the future." This statement was made in the chambers of the meeting.

27. After the September 2018, board meeting, acting member, Ray Evans, began to call and visit with the adjoining land owners for the purpose of convincing them that they should be opposed to changing the Ridley lot to commercial. Mr. Evans's visits were unsolicited by the property owners and constituted a campaign by Mr. Evans to satisfy his personal and political vendettas and to carry out his threat to fight Mr. Ridley.

28. The Plaintiffs, at the direction of the Defendants, filed an official appeal to the Zoning Board/Planning Commission seeking to re-zone their real property status from residential to commercial. Said application is attached hereto and incorporated herein by reference as ***Exhibit E.*** The Plaintiffs paid a Fifty Dollar ($50.00) fee to the Defendant for the appeal.

29. The Pikeville Zoning Board met on the 18th day of October, 2018, to consider the Plaintiffs' request to re-zone the property from residential to commercial. This meeting was also held without public advertisement pursuant to the Tennessee Open Meetings Act and the Zoning Ordinance as is set out above. According to the inaccurate minutes of the meeting, the Zoning Board members present and acting as the board included Jimmy Pope, Kay Berkebile, Susan Bilbrey, Philip Cagle, John Sells, Rays Evans, and Jane Humble.[3]

[3] The minutes of the meeting reflect that Mayor Philip Cagle and John David Sells were present, but neither were actually in attendance.

Cameron Buckner, a professional planner with the Southeast Tennessee Development District was also present at the meeting.

30. During the October Zoning Board meeting, the Plaintiff, Gregg Ridley, presented his request to re-zone to the board along with a written presentation which was part of his application previously attached as Exhibit E.

31. During the meeting, Board Member, Susan Bilbrey, explained that she had confirmed with the County Tax Assessor, that Plaintiff, Gregg Ridley, had approached him after he purchased the property and before the zoning ordinances had been put into place to request that the lot be taxed as commercial because he intended to develop it and sell it as a commercial lot. Cameron Buckner, the board's professional planner recommended that the Ridley property, Roberson property, and Farm Store on East Railroad Street should be re-zoned as commercial.

32. Board Member, Jimmy Pope, and other members of the board asked, "what type of business Mr. Ridley intended to put on the lot." Board Member, Ray Evans, said that, "he had visited Mark Sherman, Tanya Roberson, Dick Brown, and Kevin Whitson, and they informed him that they did not want the lot to be commercial."[4]

33. The Zoning Board voted 3-1 with one (1) abstention to retain the zoning status of residential and announced that the request had been denied. Upon the announcement, Cameron Buckner, the professional planner, explained to the Zoning Board that, "they only had the authority to make a recommendation and that their decision was not final." The

[4] No members of the community attended the Zoning Board meeting to voice any opposition to the re-zoning of the Ridley lot. Julie Sheldon and Charles David Sheldon, landowners near the U.S. 1-27 bypass with a similar concern as to the Plaintiffs were also present at the meeting. The Sheldon's have recently been informed by zoning board members that their land would be re-zoned to commercial along with all other tracts on the U.S. 1-27 Bypass with the exception of East Rail Road Street.

Zoning Board did not advise the Plaintiffs' of their right to appeal or the next step in the procedure either in writing nor verbally.

34. The Zoning Board is required to give a written notice of approval or denial within 60 days of the date of application per *Pikeville Zoning Ordinance Chapter 12 Section 1206(D)* attached hereto as ***Exhibit F.***

35. The Pikeville Zoning Board of Appeals' authority is derived from *T.C.A. § 13-7- 205 & 13-7-207*. The Pikeville Zoning Board of Appeals does not have the authority to authorize re-zoning requests as such re-zoning is a function of the legislative body.

36. After requesting information regarding the appeal process, Mr. Buckner informed Plaintiff, Gregg Ridley, that he was entitled to a public hearing at the November meeting of the City Alderman and Mayor where he would have an opportunity to present his request.

37. Plaintiff, Gregg Ridley, confirmed with Mayor Philip Cagle during an in-person conversation that he was on the agenda for the City Meeting to be held on November 13, 2018, so that he could speak concerning his re-zoning request. Mayor Cagle assured Mr. Ridley that he was on the agenda.

38. On the 13th day of November, 2018, the City Alderman and Mayor held a meeting concerning a variety of issues including the zoning appeal which was on the agenda. During the meeting, Cameron Buckner, the professional planner, addressed the council concerning the zoning appeal and advised them that the Zoning Board had voted to recommend that the Ridley's requested re-zoning of their lot be denied. He further advised that, "the Ridley's were entitled to a public hearing at the December 2018 meeting."

39. Alderman, Dale Wheeler, made a motion that a public hearing be held concerning the issue at the December meeting. Wheeler's motion failed to get a second as is normally required

to discuss a matter on the agenda. Discussion of the topic ensued and Alderman Anderson made the following statement, "I suggest he find out what's going on that piece of property and present that to us and that might make a difference in what it was whether we voted against the commission." Plaintiff, Gregg Ridley, asked to be recognized to speak and respond to the Alderman's request. Mayor Cagle denied Plaintiff, Gregg Ridley, the right to speak claiming he was not on the agenda and therefore, could not speak.

40. Mayor Cagle began questioning members of the crowd and specifically addressed an adjoining property owner, Tanya Roberson, who was in the crowd, and said, "Tanya, I'll be honest with you. If I owned your property, I would be very concerned. I really would… I promise you that property will not be worth what it is today. Now you can rest assured on that… That's a fact." No further action or discussion was had on the issue, and the motion failed for a lack of a second.

41. The Plaintiffs were not notified of any further rights to appeal.

42. For the reasons set forth above, the Defendants' refusal to hold a public hearing or make any kind of factual finding concerning the Plaintiffs' request for their property to be re-zoned from residential to commercial use as required by law is arbitrary and capricious and contrary to the *Zoning Ordinance of the City of Pikeville, Tennessee Chapter 12 – 1207 (D)* and *T.C.A. 6-58-107* otherwise known as the "consistency clause" and the Defendant's continued refusal to do so will cause the Plaintiffs irreparable damage for the prevention of which the Plaintiffs have no adequate legal remedy. The Plaintiffs have made no previous application for the relief sought in this Petition to any other court.

43. As a result of the Comprehensive Plan and Land Development Regulations, Plaintiffs have been deprived of all economically beneficial use of their property. Plaintiffs' attempts to

obtain relief from the comprehensive plan and land development regulations were unsuccessful. The Defendant has refused Plaintiffs any reasonable economic use of their property.

44. The Defendant's Comprehensive Plan and Land Development Regulations plan as applied to the property have deprived the owners of all economically beneficial use. The Defendant's application of these regulations has had the same effect on the Plaintiffs' ability to make use of their property as an actual exercise of eminent domain. The property has been designated as residential making the property basically worthless and impossible to sell for any reasonable value. The Defendant's use of restrictive regulations has affected the same public purpose as a condemnation under the power of eminent domain.

45. The Plaintiffs have no reasonable economic use of the property, which was purchased when there were no restrictions, either at common law or in the state or local regulations that prohibited the Plaintiffs' construction and use as a commercial lot. Plaintiffs' lot should be changed to commercial which is an appropriate remedy or that the Defendant should compensate the Plaintiffs for the regulatory taking as recognized by the Tennessee Supreme Court in *Phillips v. Montgomery County, 442 S.W. 3d. 233 (2014)*, using a standard which is substantially the same as the standard used by the United States Supreme Court in *Lucas v. South Carolina Coastal Council, 505 U.S. 1003, 112 S. Ct. 2886, 120 L. Ed. 2d 798 (1992).*

46. The Plaintiffs had no awareness at time of purchase that a far-reaching governmental restriction on the use of the property would be imposed.

47. Plaintiffs purchased the property and expended funds based on the reasonable expectation that they could market and sell their property to a commercial developer or company

consistent with the other commercial businesses in this same area. The Defendants' Comprehensive Plan and Land Development Regulations have had a major economic effect on the Plaintiffs. The Defendants' actions have prevented the Plaintiffs from using their property for any reasonable economic use and is the equivalent of a physical taking of the property.

48. The Defendants, the City of Pikeville and the Pikeville Zoning Board of Appeals, held a series of private meetings where they developed the governmental land use restrictions in violation of the Tennessee Open Meetings Act and therefore the entire ordinance is void ab initio.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

49. Defendants, through their attorney, Edward Boring, conceded that no changes will be made to the property's status as residential and that the appeals process has been exhausted. A letter in that regard from the City Attorney is attached hereto as ***Exhibit G*** and incorporated herein. It would be futile for the Plaintiffs to submit any further applications to the Defendants. Thus, Plaintiffs have exhausted all of their administrative remedies.

50. All conditions precedent to the bringing of this action have occurred.

CAUSES OF ACTION

A. WRIT OF MANDAMUS T. C. A. § 27-9-101

51. Plaintiffs reallege paragraphs 1 through 50 as if fully set forth herein.

52. The actions taken by the Defendants when reviewing the Plaintiffs' request to re-zone were arbitrary and capricious and in violation of Plaintiffs due process rights under 42 U.S.C. § 1983 et. seq.

53. The Defendants cannot and have not cited to any rational basis for the "spot zoning" that has occurred or any rational basis to support their decision not to re-zone the real property in question.

54. The entire zoning ordinance was crafted and discussed in private meetings and inconstant with the provisions of the state law which govern the process for adopting municipal zoning and therefore the entire ordinance should be declared void ab initio.

B. VIOLATION OF THE FIFTH AMENDMENT OF THE UNITED STATES CONSTITUTION

55. Plaintiffs reallege paragraphs 1 through 50 as if fully set forth herein.

56. Plaintiffs bring this complaint for damages and attorney fees pursuant to 42 U.S.C. § 1983 et. seq. Defendants' actions as alleged herein abridge Plaintiffs' substantive due process rights not to have their property taken without just compensation in violation of the Fifth Amendment to the United States Constitution. Further, Plaintiffs were denied the right to procedural due process as they were denied their right to a public hearing before the legislative body who is charged with making zoning decision and were further denied the right speak in any way concerning their request to re-zone.

57. The Defendants' Comprehensive Plan and Land Development Regulations as applied to the property have deprived Plaintiffs of all reasonable economic use of their property. The Defendants' application of the Comprehensive Plan and Land Development Regulations have had the same effect on Plaintiffs' ability to make use of the property as an actual exercise of eminent domain. The Defendants ignored this and did not attempt to exercise their power of eminent domain with respect to the property. Rather than taking the property for public use through an affirmative act of condemnation, however, the Defendants' use of restrictive regulation has affected the same public purpose.

58. All conditions precedent to the bringing of this action have occurred or have been exhausted.

C. VIOLATION OF THE TENNESSEE CONSTITUTION ARTICLE 1 § 21

59. Plaintiffs reallege Paragraphs 1 through 50 as fully set herein.

60. In addition to the United States Constitution, Article 1, Section 21 of the Tennessee Constitution also prohibits the taking of private property without just compensation. The Defendants' Comprehensive Plan and Land Development Regulations as applied to the property have deprived Plaintiffs of all reasonable economic use of their property in violation of Article 1, Section 21, of the Tennessee Constitution as recognized by *Phillips v. Montgomery Cty., 442 S.W.3d 233 (Tenn. 2014),* encompassing regulatory takings under the State Constitution to the same extent as the Taking Clause of the Fifth Amendment to the United States Constitution. Further applied by Inverse Condemnation set out in *Tenn. Code. Ann. § 29-16-123.*

61. Defendants' actions in depriving Plaintiffs of reasonable economic use of their property was undertaken without a legitimate governmental purpose.

62. Irrespective of Defendants' reasons for their actions, Defendants, nonetheless, deprived Plaintiffs of all economically viable use of their property. The Comprehensive Plan and Land Development Regulations caused a severe economic impact on the Plaintiffs.

63. Plaintiffs had a reasonable investment-backed expectation that they would develop the property for commercial use. At no time did Defendants attempt to exercise power of eminent domain. Instead, Defendants denied Plaintiffs all beneficial use of the property without just compensation.

64. Plaintiffs reallege paragraphs 1 through 50.

65. "Governing body" means: The members of any public body which consists of two (2) or more members, with the authority to make decisions for or recommendations to a public body on policy or administration....." pursuant to T.C.A. § 8-44-102.

66. The members of the Pikeville Zoning Board and Planning Commission, which are one in the same, met on multiple occasions to draft a comprehensive plan and suggested zoning ordinances and to consider changes to the same without advertising the meetings pursuant to T.C.A. § 8-44-103 & § 13-7-203. Specifically, the meetings held in September and October of 2018 were not advertised to the public.

PRAYER FOR RELIEF

Based on the allegations set forth above, Plaintiffs pray for judgment as follows:

1. Plaintiffs request this Honorable Court to enter a judgment in their favor and against the Defendants based on a violation of the Takings Clause to the Fifth Amendment of the United States Constitution as incorporated by the Fourteenth Amendment to the United States Constitution, including:

    a) Damages sustained as a result of Defendants' violation of Plaintiffs' rights under the United States Constitution, including both procedural and substantive due process violations;

    b) Attorney fees under 42 U.S.C. § 1988; and

    c) Court costs and expenses.

2. Plaintiffs request this Honorable Court to enter a judgment in their favor and against Defendants based on a violation of Article 1, Section 21, of the Tennessee Constitution,

including:

a) Damages sustained as a result of Defendants' violation of Plaintiffs' rights under the Tennessee Constitution and for the regulatory taking and inverse condemnation of their real property; and

b) Court costs and expenses.

3. Plaintiffs request that this Honorable Court enter an order finding that the City of Pikeville, the Pikeville Zoning Board, and the Pikeville Planning Commission has violated the Tennessee Open Meetings Act for failure to properly give notice or advertise their meetings.

   a) Issue an injunction requiring Defendants to comply with the provision of the Open Meetings Act.

   b) That the court supervise the Defendants and regulate all public meetings under the court direction for the next calendar year.

   c) That the Court award the Plaintiffs reasonable attorney fees and court cost for the bringing of this action.

4. Plaintiffs request that, the Court issue a Writ of Mandamus compelling the Defendants, City of Pikeville and the Pikeville Zoning Board of Appeals, to approve Plaintiffs' request for rezoning of their lot to commercial.

5. In the alternative, Plaintiffs request that the court declare the entire Zoning Ordinance void and nullified pursuant to *T.C.A.8-44-105.*

6. Plaintiffs request this Honorable Court to grant such other relief as justice requires.

7. Plaintiffs request a trial by jury on all issues so triable.

THIS IS THE FIRST APPLICATION FOR EXTRODNARY RELEIF.

Respectfully submitted this 27th day of December, 2018.

Gregg Ridley

Becky Ridley

WILLIAM T. RIDLEY
Attorney at Law

By: _____
William T. Ridley, BPR #33508
Attorney for Plaintiffs
396 South Main Street
Crossville, TN 38555
(931) 456-9455

STATE OF TENNESSEE
COUNTY OF Cumberland

I, **GREGG RIDLEY**, being first duly sworn, makes an oath that the statements made in my foregoing Complaint are true as of my own knowledge and belief and that my Complaint is not made out of levity or in collusion with the Defendant, but in sincerity and truth for the causes mentioned in the Complaint and that I am justly entitled to the relief herein sought.

GREGG RIDLEY

Sworn to and subscribed before me this 27th day of December, 2018.

Notary Public

My commission expires: Aug. 5, 2020

TERRI WALKER
STATE OF TENNESSEE NOTARY PUBLIC
CUMBERLAND COUNTY
My Commission Expires 8/5/2020

STATE OF TENNESSEE
COUNTY OF Cumberland

I, **BECKY RIDLEY**, being first duly sworn, makes an oath that the statements made in my foregoing Complaint are true as of my own knowledge and belief and that my Complaint is not made out of levity or in collusion with the Defendant, but in sincerity and truth for the causes mentioned in the Complaint and that I am justly entitled to the relief herein sought.

BECKY RIDLEY

Sworn to and subscribed before me this 27th day of December, 2018.

Notary Public

My commission expires: Aug. 5, 2020

COST BOND

We are sureties for the non-discretionary cost of this cause not to exceed $500.

Filed 12-28-18
Time _____ m.
Clerk dd
Greg Forgey
Clerk & Master
Bledsoe County, TN

Gregg Ridley

Becky Ridley

William T. Ridley, Attorney

EXHIBIT A

Filed 12-28-18
Time ____ m
Clerk dd
Greg Forgey
Clerk & Master
Bledsoe County, TN

Prepared by William T: Ridley, Attorney
157 Lantana Road
Crossville, TN 38555

It is the Responsibility of the Grantee of this instrument to immediately record it. Failure to record this instrument could adversely affect the validity of your title.

WARRANTY DEED

For and in consideration of the sum of Ten Dollars ($10.00), cash in hand paid, and other good and valuable considerations not herein mentioned, receipt of all of which is hereby acknowledged, I, **Charles P. Bownds, being one and the same as C.P. Bownds, surviving spouse of Joyce Bownds, now deceased,** have this day bargained and sold and by these presents do hereby bargain, sell, transfer and convey unto **Gregory Ridley and wife, Becky Ridley,** their heirs and assigns the following described property.

Map 65-I-F-017.01
Map 65-I-F-014.00

In the Fourth Civil District of Bledsoe County, Tennessee, bounded and described as follows:

The following described property is a combination of Tax Map 651-F parcel 017.01 and parcel 014.00:

Beginning at an iron rod found in the southern margin of East Railroad St, said iron rod is also the northwest corner of Robinson(63/249) and a northeast corner to this described tract, thence with the western line of Robinson, S 48°14'05" E a distance of 80.43 to an iron rod found, thence S 48°31'10" E a distance of 51.38' to an iron rod found, thence leaving Robinson and with an alley way, S 41°42'37" W a distance of 67.51' to an iron rod found, thence S 41°42'37" W a distance of 119.90' to an iron rod set in the eastern margin of Cumberland Ave, thence with said avenue, N 48°23'08" W a distance of 71.82' to an iron rod set, thence leaving said avenue and with the southern line of Brown(95/349), N 41°36'52" E a distance of 30.00' to an iron rod set, thence N 48°23'08" W a distance of 60.00' to an iron rod set, thence leaving Brown and with aforementioned East Railroad St, N 41°43'49" E a distance of 87.64' to an iron

STATE OF TENNESSEE
COUNTY OF BLEDSOE

Before me, the undersigned authority, a Notary Public, in and for said State and County, personally appeared **Charles P. Bowuds**, with whom I am personally acquainted (or proved to me on the basis of satisfactory evidence) and who acknowledged the execution of the foregoing instrument for the purposes therein contained and expressed.

Witness my hand and official seal of office on this the 19th day of December, 2016.

William T. Ridley
Notary Public

WILLIAM T. RIDLEY
STATE OF TENNESSEE NOTARY PUBLIC
CUMBERLAND COUNTY
My Commission Expires

My commission expires: 8/5/2020

SEND TAX STATEMENTS TO
NEW PROPERTY OWNER:

Gregory Ridley w/ Becky Ridley

156 Robnett Rd.

Pikeville, TN 37367

STATE OF TENNESSEE
COUNTY OF BLEDSOE

I, or we hereby swear or affirm that the actual consideration for this transfer or value of the property transferred, whichever is greater is $ 30,000.00, which amount is equal to or greater than the amount which property transferred would command at a fair and voluntary sale.
Amount tax paid $ 111.00.

Affiant

Subscribed and sworn to before me
this the 20th day of December, 2016.

Emma S. Boynton, Register
~~Notary Public~~

My commission expires: N.A.

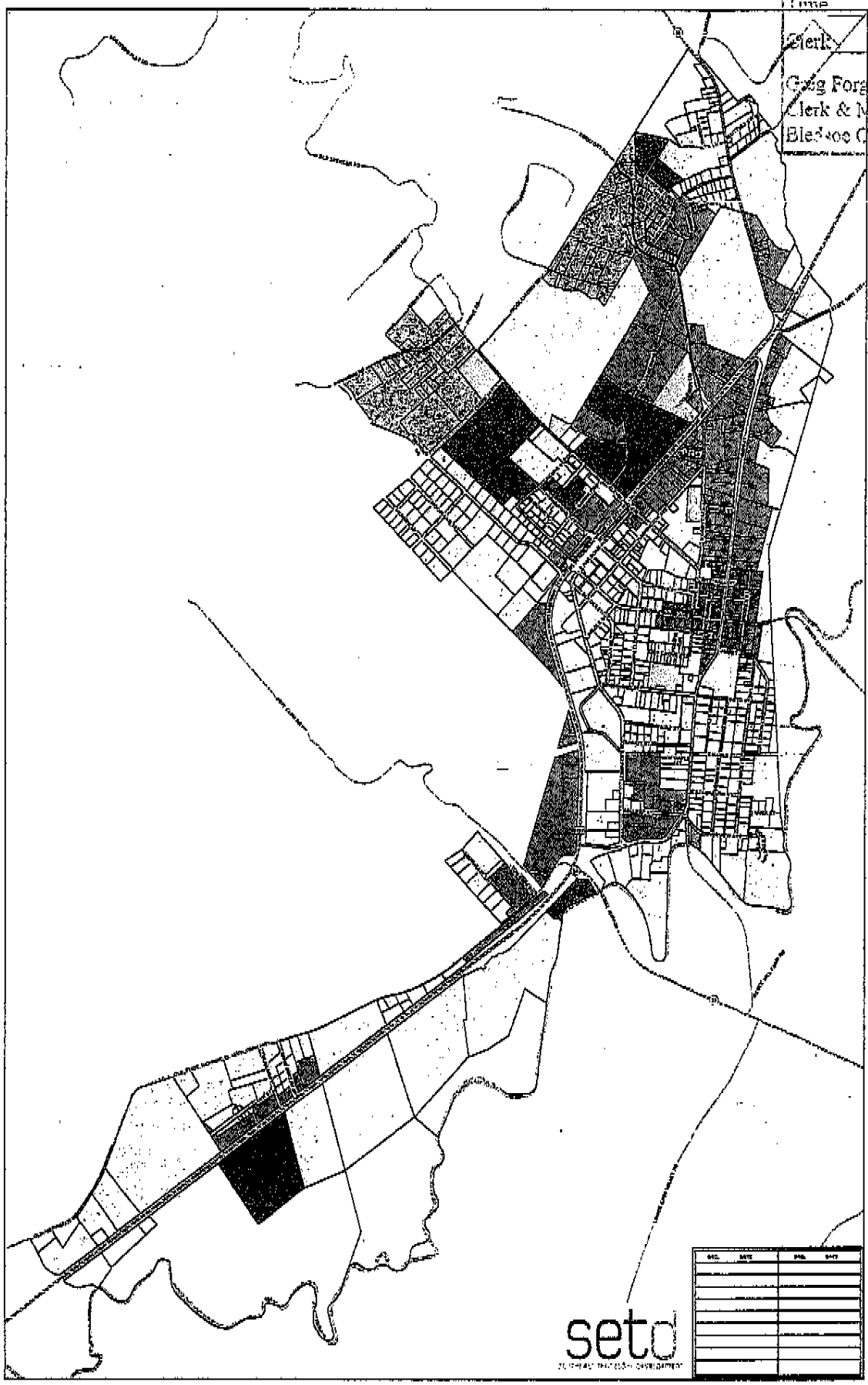
BK/PG: RB308/268-270
16114224

3 PGS:AL-WARRANTY DEED	
608 BATCH: 30296	12/20/2016 - 10:10 AM
VALUE	30000.00
MORTGAGE TAX	0.00
TRANSFER TAX	111.00
RECORDING FEE	15.00
ARCHIVE FEE	0.00
DP FEE	2.00
REGISTER'S FEE	1.00
TOTAL AMOUNT	129.00

STATE OF TENNESSEE, BLEDSOE COUNTY
EMMA S. BOYNTON
REGISTER OF DEEDS

EXHIBIT B

Filed 12-28-18
Time ____ m
Clerk dd
Greg Forgey
Clerk & Master
Bledsoe County, TN



Legend
U.S. Highway
State / County Highway
ZONING
A-1 Agricultural District
C-1 Downtown Commercial District
C-2 General Commercial District
I-1 Industrial District
R-1 Low Density Residential District
R-2 High Density Residential
R-3 General Residential District

ZONING
PIKEVILLE, TENNESSEE

The Zoning Map was officially adopted by the Pikeville Board of Mayor and Aldermen meeting in regular session on _____ by a majority of the members present.

_____
Mayor, Town of Pikeville

Map Prepared by
Community Development
Southeast Tennessee Development District
Chattanooga, TN
Geographical Information Systems

This map is for planning purposes only. This is not an engineering map.

Source: SETDD and 2012 TNGAP Data

N
W E
S

EXHIBIT C

Filed 12-28-18
Time
Clerk dd
Greg Forgey
Clerk & Master
Hamilton County, TN

CITY OF PIKEVILLE REGULAR MEETING ON FEBRUARY 8TH, 2016 @ 6:30 P.M. @ CITY HALL

PRESENT: MAYOR, PHILIP CAGLE
ALDERMAN, SENIA ANDERSON
ALDERMAN, JANE HUMBLE
ALDERMAN, DALE WHEELER

RECORDER, DEBRA BARNETT
ATTORNEY, EDWARD BORING

ABSENT: ALDERMAN, REED SELLS

Others Present; Paul Swafford, Sandy Dodson

A copy of the previous minutes was given to each member of the board and after reviewing; motion to approve as distributed was made by Anderson and seconded by Wheeler.
Vote – ALL YES

Fire Chief, Paul Swafford presented the following officers for approval:
Chief, Paul Swafford Asst. Chief – Dale Hannah Captain – Roger Bray
Lieutenant – Cory Prater, Creed Newby, Matt Ingram
Motion was made by Anderson and seconded by Humble to approve the Fire Dept. Officers.
Vote – Wheeler – YES, Anderson – YES, Humble – YES

Motion was made by Wheeler and seconded by Anderson to approve moving $1,235.63 of utility debt from active status to inactive status for collection and also approve the utility adjustments.
Vote – Wheeler – YES, Anderson – YES, Humble – YES

The Mayor recommended the following for approval for the Planning Commission:
Susan Bilbrey, Jimmy Pope, Rachel Bruning, Ray Evans, At- Large Member John Sells.
Motion was made by Wheeler and seconded by Anderson to approve the above recommendation for Planning Commission Members.
Vote – Anderson – YES, Wheeler – YES, Humble – YES

The Mayor expressed the need for the city to purchase a sewer jet machine to pump out the lines. The city of Dunlap has helped us in the past and it is much appreciated however, I would like for the city to look at getting one. Justin Thomas is working on a proposal to present at the next meeting.

Motion was made by Humble to pay Aldermen only when they attend a meeting.
After some discussion, the board asked Attorney Boring to research the matter and get back with a recommendation.
Motion was then made by Humble and seconded by Wheeler to table the above motion on the Aldermen pay when meetings are not attended.
Vote – ALL YES

In other business:

*Two other companies have come and showed the water department their drive by meter system. There is a great need to try and get our water loss down and it would also increase the revenue. Fortiline is coming back February 29th, to demonstrate the operation to the office utility ladies.

*An emergency generator is going to be able to purchase through grant money.

There being no further business, motion to adjourn was made by Anderson and seconded by Humble. Vote – ALL YES

Philip Cagle/Mayor

Debra Barnett, City Recorder, CMFO

CITY OF PIKEVILLE REGULAR MEETING ON MAY 9TH, 2016 @ 6:30 P.M. @ CITY HALL

PRESENT:	MAYOR,	PHILIP CAGLE
	ALDERMAN,	SENIA ANDERSON
	ALDERMAN,	JANE HUMBLE
	ALDERMAN,	REED SELLS
	ALDERMAN,	DALE WHEELER
	RECORDER,	DEBRA BARNETT
	ATTORNEY,	EDWARD BORING

OTHERS PRESENT; BETTY RENICK, SANDY DODSON, DUDE CAMPBELL, PAUL SWAFFORD, DALE HANNAH, ROGER BRAY, JEFF TURNER, TYLER DEBORD, AND OTHERS

A copy of the previous minutes was given to each member of the board and after reviewing; motion to approve as distributed was made by Anderson and seconded by Sells.
Vote – ALL YES

The mayor informed the board about some concerns he had about the fire dept. He said that he had walked in the fire dept. looking for the owner of a truck setting at the Farmers Market. Someone told him it was Tyler's truck and he was in the bunk room. The mayor said he opened the door and there was only the lighting of the TV and a girl was on the couch and three firemen in their bunks. He said that, although nothing was going on, it could pose problems in the future. Other concerns mentioned were firemen living there, and increase in the utility bills. Mayor said he wanted best dollar for the tax payers.

Paul Swafford, Fire Chief, addressed the board about some concerns that the mayor had spoken with him about. He said that, the girl that was on the couch had just come off of a 36 hr. shift as a BCEMS and she had also attended fire training that day and her husband and her were fire members and he was in the front bay working on truck and she was waiting on a ride home.

He also said that, having firemen at the station cut down on their response time helping with the ISO rating and that no one was living there but they did stay there on occasion. Also, we have cameras all over the building except restrooms and guidelines for use of the building and volunteers staying overnight. The utilities are within budget he mentioned. He asks the board to leave it the way it was.

Motion was made by Sells and seconded by Wheeler for the fire department to continue the way it was and to get them a copy of the guidelines.
Vote – ALL YES

Lisa Wheeler addressed the board on behalf of Wheelers Express Lube being compensated for the use of the well on their property.

The mayor informed her that, the well was not being used and it could not be used because the treatment plant could not clear it up the few times they had tried to use it. The city will be capping it off and removing equipment.

Motion was made by Sells and seconded by Wheeler to approve moving $16,351.64 of utility debt from active status for collection and also approve the utility adjustments.
Vote – Anderson – YES, Humble – YES, Wheeler – YES, Sells – YES

ORDINANCE #3A-14-O16

AN ORDINANCE TO AMEND THE 2015-2016 WATER SEWER FUND BUDGET FOR PURCHASE OF A SEWER JET MACHINE. 3RD READING

Motion was made by Sells and seconded by Wheeler to approve the above said ordinance.
Vote – Humble – YES, Anderson – YES, Wheeler – YES, Sells – YES

ORDINANCE #3B-14-O16

AN ORDINANCE TO AMEND THE CITY OF PIKEVILLE 2015-2016 BUDGETS IN ALL THE FUNDS THAT NEEDS IT. 3RD READING

Motion was made by Wheeler and seconded by Sells to approve the above said ordinance.
Vote – Anderson – YES, Humble – YES, Wheeler – YES, Sells – YES

Motion was made by Anderson and seconded by Sells to vote to reject the Municipal Building renovations bids because they came in to high.
Vote – Wheeler – YES, Humble – YES, Sells – YES, Anderson – YES

Motion was made by Sells and seconded by Humble to extend the City's Garbage Disposal contract with Cumberland Waste Disposal for three (3) more years with no rate increase.
Vote – Anderson – YES, Wheeler – YES, Sells – YES, Humble – YES

The mayor informed the board the planning commission would be meeting May 19th, 2016 @ 6:00 p.m. and one member from the city council would need to be on the board. He said someone could volunteer or he would appoint one. Mr. Sells volunteered to serve on the board.
Motion was made by Anderson and seconded by Wheeler to accept Mr. Sells as the city council member on the planning commission.
Vote – ALL YES

In other business:
*check on purchasing a street vacuum in the next budget

There being no further business; motion to adjourn was made by Sells and seconded by Wheeler.
Vote – ALL YES

Philip Cagle, Mayor

Debra Barnett, City Recorder, CMFO

EXHIBIT D

Date 12-28-18
Clerk
Clerk
Land Charge
Register of Deeds
Bledsoe County, TN

1207 Board of Zoning Appeals

A Pikeville Board of Zoning Appeals (BZA) is hereby established in accordance with Sections 13-7-205 through 13-7-207 of Tennessee Code Annotated. The board of zoning appeals shall consist of the membership of the Pikeville Municipal Planning Commission with terms concurrent as those for the planning commission.

A. Procedure. Meetings of the board of zoning appeals shall be held at the call of the chairman, and at such other times as the BZA may determine. Such chairman, or in his absence, the acting chairman, may administer oaths and compel the attendance of witnesses. All meetings of the BZA shall be open to the public. The BZA shall adopt rules of procedure and shall keep records of application and action taken thereon which shall be public records.

B. Appeals to the board. An appeal to the Pikeville BZA may be taken by any person, firm, or corporation aggrieved, or by any governmental office, department, board, or bureau affected by any decision of the enforcement officer based in whole or in part upon the provisions of this ordinance. Such appeal shall be taken by filing with the BZA a notice of appeal specifying the grounds thereof and paying any required fees. The enforcement officer shall transmit to the board all papers constituting the record upon which the action appealed was taken. The BZA shall fix a reasonable time for the hearing of the appeal, give public notice thereof, as well as due notice to the parties in interest, and decide the same within a reasonable time. Upon the hearing, any person or party may appear in person, by agent, or by attorney.

C. Powers of the board. The board of zoning appeals shall have the following powers:

1. Administrative Review. To hear and decide appeals where it is alleged by the appellant that there is error in any order, requirement, permit, decision, determination, or refusal made by the enforcement officer or any other administrative official in the carrying out of the enforcement of any provision of this ordinance.

2. Special Exceptions. To hear and decide applications for special exceptions as specified in this ordinance, hear requests for interpretation of the zoning map, and for decision on any special questions upon which the board of zoning appeals is authorized to pass.

3. Variances. To hear and decide applications for variances from the terms of this ordinance in accordance with Section 1105.

D. Public Hearing. All cases brought to the board of zoning appeals shall be preceded by an advertisement in a newspaper of general circulation within the city stating the date, time, location, and subject matter the board will consider.

EXHIBIT E

Date 12-28-18
Time
Clerk
Clerk & Master
Bradley County, TN

APPENDIX C. APPLICATION FOR ZONING AMENDMENT

City of Pikeville, Tennessee

25 Municipal Drive, Pikeville, TN 37367 (Physical) | PO Box 225, Pikeville, TN 37367 (Mailing)
(423) 447-2919 / Fax (423) 447-2028

COMPLETE ALL APPLICABLE SECTIONS AND SUBMIT REQUIRED MATERIALS.

APPLICANT INFORMATION

Name: Gregory Ridley ETUX Beth	Phone: 423-702-1682
Mailing Address: 151 Rabbitt Rd, Pikeville, TN 37367	Email: GJR125@bledsoe.net

REQUEST FOR ZONING TEXT AMENDMENT

Section of Zoning Ordinance to be amended:

Text of proposed amendment:

Attach additional pages if necessary.

Explanation/justification for proposed amendment:

Attach additional pages if necessary.

REQUEST FOR ZONING MAP AMENDMENT (REZONING)

Is the applicant (identified above) the OWNER of the property to be rezoned? (YES) or NO

If "NO" to previous question, provide the following property owner information:

Owner Name:	Owner Phone:
Owner Mailing Address: 151 Rabbitt Rd, Pikeville, TN	Applicant relationship to owner:
Physical Address of Property to be Rezoned: 60 East Railroad, Pikeville, TN 37367	
Tax Map and Parcel Number of Property to be Rezoned: 094SX-065I-04 Parcel 014.00	
Current Zoning: (Circle) (R-1) R-2 R-3 AG C-1 C-2 I-1	Proposed Zoning: (Circle) R-1 R-2 R-3 AG C-1 C-2 I-1
Describe current use and condition of property: See attached.	Describe future plans for property after rezoning: See attached

Attach additional pages if necessary and provide documentation (e.g. site plan, architectural renderings, subdivision plat) that may assist with application review.

I hereby certify that the information provided on this application is true and correct. I understand that this application and any supplemental materials will be presented in public meetings and that public hearing notices will be mailed to nearby property owners. I also understand that this application does not provide any guarantee that the proposed amendment or rezoning will be adopted by the City of Pikeville.

Applicant: [signature] Date: 10-1-18

OFFICE USE ONLY

Office Review	Application fee:	Staff Initial For Payment:	Payment Date:
Planning Review	Date Referred to Planning Staff:	Date Presented to Planning Comm.:	Planning Comm. Recommendation:
City Action	Reading Dates: 1st / 2nd / 3rd	Date of Public Hearing:	Zoning Ordinance/ Map Updated:

October 1, 2018,

Current use: The property documented by Tax Mapp # 04578-0651-04 – Parcel 014.00 is currently a commercial property. The property was purchased on December 16, 2016 to sale for the location of a small business.

At the time of purchase, a rental house was located on the property. The renter refused to vacate the property, so to move forward with the preparation of a commercial lot, I was forced to obtain a court order demanding that they leave the property.

Immediately, a local contractor was hired to tear down the existing structure, remove trees, and level the lot, so that the property could be marketed for a future business. Currently, this property is commercial ready for a small business.

During this time, I negotiated sale price and terms with Little Cesar's Pizza, Hardee's, Doctor Lee, and River City, Ag Credit. Doctor Lee decided to remodel his existing building and Ag Credit purchased other land on the bypass.

Future use: To be sold for future development of a small business.

Property Type: 00 Residential

ASSESSOR OF PROPERTY - PROPERTY RECORD CARD

CUMBERLAND AVE 9
Property Address

Ownership and Mailing Address
RIDLEY GREGORY
ETUX BECKY
156 ROBNETT RD
PIKEVILLE TN 37367

Subdivision BK PG BLOCK LOT TRACT
All Subdiv BK PG BLOCK LOT TRACT
Additional Description
Dimensions 80X30X20X90X60X120

TAX YEAR 2018 BLEDSOE COUNTY

JUR	CONTROL MAP	GROUP	PARCEL	PR	SH
004	065I	F	014.00		000

CITY 04578 PIKEVILLE
SSD1
SSD2
Total Land Units 1.00
Deeded Acres 0.58
Calculated Acres 0.00

Map 065I Updated 09/27/2017
Dist 04 Printed 09/04/2018
Card 1 of 1
Page 1 of 1

IMPROVEMENT DETAILS

Improv Type | Lower Level
Stories | Heating/Air
Exterior Wall | Attic
Heating Fuel
Yr Built | Eff Yr Built | Rooms | Bedrooms
Baths | Half Baths | Add'l Fixtures | Total Fixtures
FP Stacks | Openings | Add'l Sty | Prefab | Add'l Sty
Info Src | Occ | Rental Src | Year | Amount | Sched

Foundation
Floor System
Party Wall
Struct. Frame
Roof Framing
Roof Cov/Deck
Cab/Millwork
Floor Finish
Interior Finish
Plbg/Decor
Bath Tile
Electrical
Shape

Quality | Condition | Class
Procedure | Date | Factor | % Comp | Cost & Design
Dep: Physical | Other Phys | Functional | External | % Good

GRLA	Factors: Area	Story	Const	Grade	SFLA	Dep Yr	Eff Age	County Factor

Base Dwelling | Add'l Areas | Total | SFLA
RCN
RCNLD
% Complete
Dwelling Factor
Dwelling Value

AREAS: Lower Floor	First & Above	Area	% SFLA	Rate	RCN

APPRAISED VALUE

LAND	19,500
IMPROVEMENTS	0
TOTAL APPRAISAL	19,500
GREENBELT APR	
ASSESSMENT	4,875
ASSESSED @	25%
APPROACH	COST VALUE

Value Correlation

COST	19,500
INCOME	
MARKET	

PARCEL DATA

NBHD P01
Review Flag
Living Units
Water/Sewer 01 Public / Public
Electricity 01 Public
Gas 00 None
Topo 1 Rolling
Road Type 3 Paved
Delete Next Year
Greenbelt Review N
Land Apr Date 09/13/1983 By 07
Improvements 1
Mobile Homes 0
Mil Treat 0 Stable
Other
Land Use Code 11
Zoning

SALES HISTORY

Date	Code	
08/06/2004	01 Bldg Apr	07

BUILDING PERMITS

Year | Recorded
Appr | Book/Pg

OBY/YARD IMPROVEMENTS

Total OBY Value

Date	Type	Status	Last Visit

MARKET LAND

#	Type	Table	Code	Acc	Front	Depth	Units	Rate	Mil	Fld	Topo	Loc	Size	Mkt	Dep	Adj Rate	Value	Class
1	U	22	61		0	0	1.00	19,500.00							100	19,500.00	19,500	
						Totals:	1.00										19,500	

USE VALUE

#	Mkt Use	Use Type	Soil Type	Access	Acres	Rate	Use Value
				Totals:			

SALES

Date	Book	Page	Price	Adj Price	VA	Instr	A/R	Owner
12/18/2015	308	268	30,000	30,000	I	WD	M	RIDLEY GREGORY
11/13/2003	182	458	28,000	28,000	I	WD	A	BOWNDS C P
02/08/1996	152	211	20,000	20,000	I	WD	A	KRAUSE JOHN
04/27/1988	123	199	26,500	25,000	I	WD	A	THOMAS WILMA J

NOTES

HOUSE TORN DOWN JANUARY 2017 AFTER SALE IN RB 308 PG 268

GA330FN Local PRC

State of Tennessee– IMPACT System Data

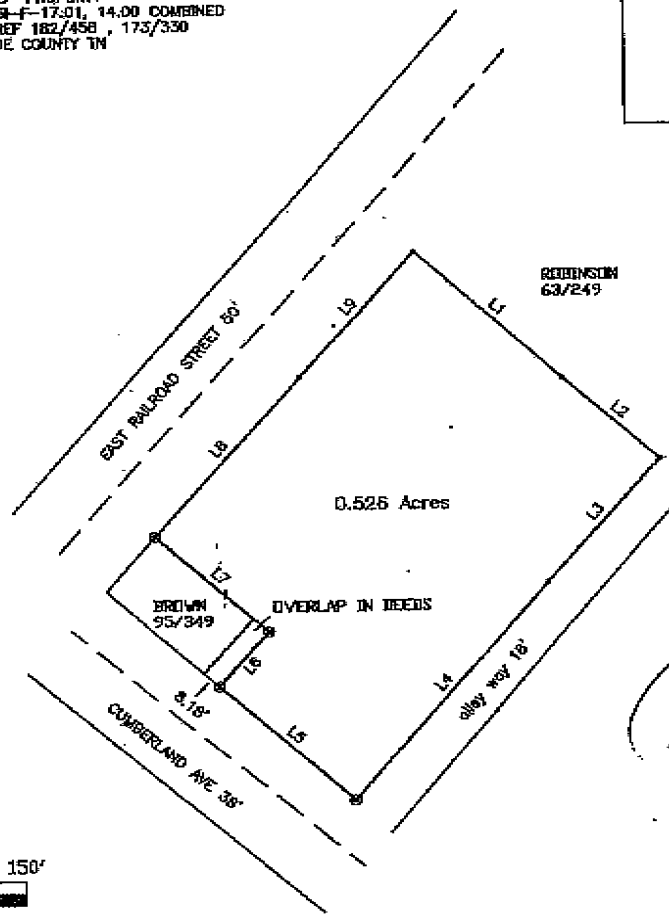
19500

BOWNDS PROPERTY
MAP 65I-F-17.01, 14.00 COMBINED
DEED REF 182/458 , 173/350
BLEDSOE COUNTY TN

TN GRID

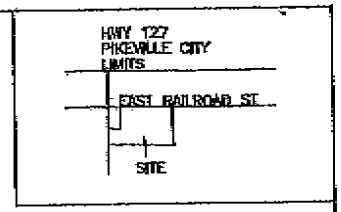
IRON ROD FOUND

IRON ROD SET



LINE	BEARING	DISTANCE
L1	S 48°14'05" E	80.43'
L2	S 48°31'10" E	51.38'
L3	S 41°42'37" W	67.51'
L4	S 41°42'37" W	119.90'
L5	N 48°23'08" W	71.82'
L6	N 41°36'52" E	30.00'
L7	N 48°23'08" W	60.00'
L8	N 41°43'49" E	87.64'
L9	N 41°43'49" E	69.86'

0' 50' 100' 150'



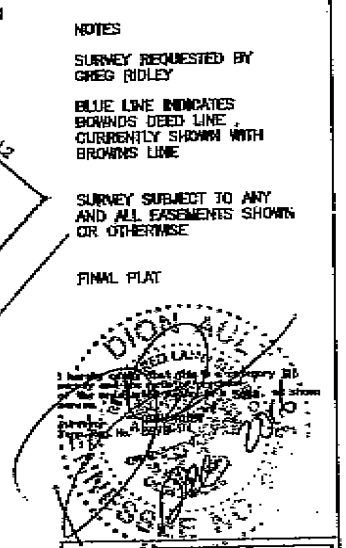
NOTES

SURVEY REQUESTED BY
GREG RIDLEY

BLUE LINE INDICATES
BOWNDS DEED LINE ,
CURRENTLY SHOWN WITH
BROWNS LINE

SURVEY SUBJECT TO ANY
AND ALL EASEMENTS SHOWN
OR OTHERWISE

FINAL PLAT



M65I-F-17.01-14

Filed 12-28-18
Time
Clerk
Greg Forgey
Bledsoe County, TN

EXHIBIT F

1204 Temporary Use Permits

It shall be unlawful to commence construction or development of any use requiring a temporary use permit has been secured from the enforcement officer as provided in Section 526 of this ordinance. Application for a temporary use permit shall be made in writing to the enforcement officer on the forms provided for that purpose.

1205 Certificate of Occupancy

No land or building or other structure or part thereof hereafter erected, moved, or altered in its use shall be used until the enforcement officer has issued a certificate of occupancy stating that such land, structure, or part thereof is found to be in conformity with the provisions of this ordinance. Within 3 days after notification that a building or premises or part thereof is ready for occupancy or use, it shall be the duty of the enforcement officer to make a final inspection thereof, and to issue a certificate of occupancy, if the building or premises or part thereof is found to conform with the provisions of this ordinance; or, if such certificate is refused, to state the refusal in writing with the cause for such refusal.

1206 Procedure for Authorizing Special Exceptions and Uses Permitted on Review

The following procedure is established to provide procedures for review of a proposed use by the planning commission. This procedure shall also be used in submitting special exception for approval from the board of zoning appeals.

A. Application. An application shall be filed with the planning commission for review. Said application shall show the location and intended use of the site, the names of the property owners and existing land uses within 200 feet, and any other material pertinent to the request which the planning commission or other sections of this ordinance may require.

B. Restrictions. In the exercise of its approval, the planning commission may impose such conditions upon the proposed uses of buildings or land as it may deem advisable in the furtherance of the general purposes of this ordinance.

C. Validity of plans. All approved plans, conditions, restrictions, and rules made a part of the approval of the planning commission shall constitute certification on the part of the applicant that the proposed use shall conform to such regulations at all time.

D. Time limit. All applications reviewed by the planning commission shall be decided within 60 days of the date of application, and the applicant shall be provided with either a written notice of approval or denial, which will constitute a permit for a use permitted on review.

EXHIBIT G

Law Office of
EDWARD L. BORING
3117 Main Street
P.O. Box 1025
Pikeville, Tennessee 37367

EDWARD L. BORING, Attorney
Telephone: (423) 447-3311
Facsimile: (423) 447-3313

November 27, 2018

William T. Ridley
Attorney at Law
396 S. Main Street
Crossville, Tennessee 38555

Dear Will:

This will simply confirm that I do not think your clients are entitled to any further appeal or public hearing concerning their request for a zoning change. I do believe they have exhausted their remedies with the City of Pikeville Board of Mayor and Aldermen.

I would think the next step would be to file a Petition for Certiorari.

The City Meeting was recorded but the minutes have not been prepared. We are attempting to get a digital recording of the meeting. I am checking on the BZA meeting.

Sincerely,

Edward L. Boring

Cc: Mayor Philip W. Cagle