

STATE OF MICHIGAN THIRD JUDICIAL CIRCUIT WAYNE COUNTY	SUMMONS	CASE NO. 23-015008-CH Hon. Leslie Kim Smith
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Court telephone no.: 313-224-2427

Plaintiff's name(s), address(es), and telephone no(s)
Lint, Christal et. Al

v

Defendant's name(s), address(es), and telephone no(s).
The City of Grosse Pointe Woods

Plaintiff's attorney, bar no., address, and telephone no
Richard Daniel Linnell 59339
2804 Orchard Lake Rd Ste 203
Keego Harbor, MI 48320-1449

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035
 - MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
 - There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
 - A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in this court, _____ Court, where it was given case number _____ and assigned to Judge _____.
- The action remains is no longer pending.

Summons section completed by court clerk.

SUMMONS

NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party or **take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date 11/17/2023	Expiration date* 2/16/2024	Court clerk Laverne Chapman
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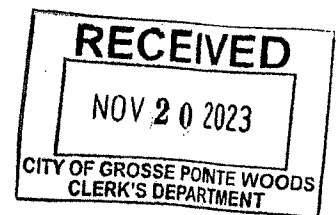
Cathy M. Garrett- Wayne County Clerk.

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

MC 01 (3/23)

SUMMONS

MCR 1.109(D), MCR 2.102(B), MCR 2.103, MCR 2.104, MCR 2.105



PROOF OF SERVICE

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE

I served personally by registered or certified mail , return receipt requested, and delivery restricted to the addressee(copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name <i>Gretchen Miotto</i>	Date and time of service <i>11/20/23 10:45AM</i>
Place or address of service <i>20025 MACK PLAZA DR, GPW, MI 48236</i>	
Attachments (if any)	

I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled \$	Fee \$	
Incorrect address fee \$	Miles traveled \$	Fee \$	Total fee \$

Signature
Gretchen Miotto
Name (type or print)

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of the summons and complaint, together with

Attachments (if any) _____ on *11/20/23 10:45AM*
Date and time

_____ on behalf of _____

Signature

NOV 23 2023
10:45 AM
CLERK OF COURT
MICHIGAN COURTS

STATE OF MICHIGAN

IN THE 3RD CIRCUIT COURT FOR THE COUNTY OF WAYNE

CHRISTAL LINT, DANIEL SPIES, and
EDGAR RINKE, JR.,

Plaintiffs,

CASE NO.: 23 -
HON.

- CH

v

NICHOLAS AVOURIS and ALANNA AVOURIS;
THE CITY OF GROSSE POINTE WOODS;
ARTHUR W. BRYANT, Mayor of the City of Grosse
Pointe Woods; THE CITY OF GROSSE POINTE WOODS
BUILDING DEPARTMENT; and MCKENNA AND ASSOCIATES,
a Michigan domestic profit corporation,
Jointly and severally,

Defendants.

LINNELL & ASSOCIATES, PLLC
BY: RICHARD D. LINNELL (P59339)
DAVID H. APPLEBAUM (P78794)
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THERE IS NO OTHER CIVIL ACTION BETWEEN THESE PARTIES ARISING OUT OF THE SAME TRANSACTION OR OCCURRENCE AS ALLEGED IN THIS COMPLAINT PENDING IN THIS COURT, NOR HAS ANY SUCH ACTION BEEN PREVIOUSLY FILED AND DISMISSED OR TRANSFERRED AFTER HAVING BEEN ASSIGNED TO A JUDGE.

COMPLAINT REQUESTING EQUITABLE AND INJUNCTIVE RELIEF

NOW COME Plaintiffs CHRISTAL LINT, DANIEL SPIES, and EDGAR RINKE JR. (“Plaintiffs”), by and through their attorneys LINNELL & ASSOCIATES, PLLC, and for their Complaint against Defendants NICHOLAS AVOURIS and ALANNA AVOURIS; THE CITY

OF GROSSE POINTE WOODS; ARTHUR BRYANT; THE CITY OF GROSSE POINTE WOODS BUILDING DEPARTMENT; and MCKENNA AND ASSOCIATES, and state as follows:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff CHRISTAL LINT (“Lint”) is an owner of residentially-zoned real property located in the City of Grosse Pointe Woods, County of Wayne, State of Michigan, and more commonly known as 727 N. Renaud Rd., Grosse Pointe Woods, Michigan (“Lint Property”).

2. Plaintiff DANIEL SPIES (“Spies”) is also an owner of residentially-zoned real property located in the City of Grosse Pointe Woods, County of Wayne, State of Michigan, and more commonly known as 727 N. Renaud Rd., Grosse Pointe Woods, Michigan (“the Lint Property”).

3. Plaintiff EDGAR RINKE, JR. (“Rinke”) is the owner of residentially owned real property located in the City of Grosse Pointe Woods, County of Wayne, State of Michigan, more commonly known as 633 S. Renaud Rd., Grosse Pointe Woods, Michigan.

4. Defendants NICHOLAS AVOURIS and ALANNA AVOURIS (“Avouris”) are the owners of residentially zoned real property located in the City of Grosse Pointe Woods, County of Wayne, State of Michigan, more commonly known as 707 N. Renaud Rd., Grosse Pointe Woods, Michigan, which is the genesis of this litigation (“Subject Property”).

5. Defendant THE CITY OF GROSSE POINTE WOODS (“GPW”) is a Michigan municipal corporation operating in Wayne County, Michigan.

6. Defendant ARTHUR W. BRYANT, in his capacity as Mayor of GPW (“Bryant”) is, upon information and belief, an individual who resides in Grosse Pointe Woods, Wayne County, Michigan.

7. Defendant THE CITY OF GROSSE POINTE WOODS BUILDING DEPARTMENT (“GPW BD”) is an instrumentality and department of GPW delegated the responsibility of ensuring the health, safety, and welfare of citizenry at large in GPW are protected by enforcing building and construction standards within the boundaries of the municipality.

8. THE CITY OF GROSSE POINTE WOODS ZONING BOARD OF APPEALS, (“GPW Zoning Board”) as authorized under the Michigan Zoning Enabling Act (“MZE”) and Sec. 50-7.15 of the City of Grosse Pointe Woods Zoning Ordinance (“GPW Zoning Ordinance”).

9. GPW, Bryant, the GPW BD and shall be collectively referred to as the (“Municipal Defendants”)

10. Defendant MCKENNA AND ASSOCIATES (“McKenna”) is a Michigan corporation frequently in the business of contracting urban planning, landscape architectural, and other planning services to both municipal and private clients.

11. Venue is proper with this Court, as the subject properties are located in Wayne County, Michigan.

12. Subject matter jurisdiction is proper in this Court as Plaintiffs seek equitable and injunctive relief.

13. This Complaint concerns the illegal construction of the Subject Property, a single-family residence in violation of both the City of Grosse Pointe Woods Code of Ordinances (“GPW Code”) and GPW Zoning Ordinance, together with the intentional obscuring of public records by various departments of GPW to facilitate said construction.

GENERAL ALLEGATIONS

14. Plaintiffs incorporate the previous allegations as though fully restated herein.

I. Summary Of Argument.

15. Prior to Avouris purchasing the Subject Property, a single family ranch home was situated upon the Subject Property (**Exhibit A**, Neighborhood flyer).

16. Avouris, without the necessary permits, demolished the ranch home, to the point where no part of the original structure remained.

17. Avouris then constructed a new dwelling on the Subject Property, again, without all necessary permits, and without application for variances from the GPW Zoning Board.

18. Now, with an unpermitted structure on the Subject Property, Avouris and the Municipal Defendants are attempting to evade the application of the GPW Code and GPW Zoning Ordinance the Subject Property.

19. The intentional acts of Avouris resulted in the demolition and abandonment of a non-conforming structure, followed by the erection of a new structure that violates several clear legal requirements, including the termination of any pre-existing non-conforming use status that may have been applicable to the former structure on the Subject Property.

20. Defendants – individually or collectively -- cannot now manufacture a set of circumstances wherein the Subject Property is legally conforming.

21. Plaintiff Lint has requested supporting documentation from Municipal Defendants via the Freedom of Information Act (“FOIA”) process of permits and plans related to the Subject Property.

22. Plaintiff’s Lint’s requests have not been met with transparency, and instead lack the production of responsive documents in existence at the time the requests were made.

23. Avouris abandoned the previously existing non-conforming structure, and the Municipal Defendants must declare that Avouris’s actions constitutes conclusive proof of an intention to legally abandon use of the non-conforming structure.

24. The dwelling on the Subject Property is new construction, and the Municipal Defendants must require the nuisance structure abated.

II. Abbreviated Construction History of the Subject Property.

25. Avouris acquired the Subject Property, consisting of Lots 104-112 in the plat of the Renmoor Manor Subdivision, or around, June of 2021, as evidenced by the warranty deed duly recorded in Liber 56822, Page 958, Wayne County Records.

26. Prior to their purchase of the Subject Property, Avouris began discussions with GPW regarding necessary permits for a “kitchen renovation”, as indicated in information obtained by Lint via FOIA request from Municipal Defendants (the ensuing chronology was obtained from the public record, **Exhibit B, McKenna Report and Avouris Permits.**).

27. In or about June 2021, Avouris purchased the Subject Property.

28. On or about July 9, 2021, Avouris received a simple permit for the presence of a “clean out” dumpster at the Subject Property (**Exhibit B**).

29. On or about April 14, 2022, officers or agents of the Municipal Defendants were on-site at the Subject Property, and noted Avouris was “renovating the inside of the home” and “*no permits*”.

30. Without the cessation of interior alterations, on or about July 27, 2022, Avouris obtained a “remodel only” permit (**Exhibit B**).

31. It is further noteworthy that Avouris demolished the dwelling on the Subject Property in its entirety over a year after the time of purchase, while the “remodel” only permit reflected an estimated value of work at One Hundred and Fifty Thousand and 00/100 Dollars (\$150,000.00), a fictitiously low figure.

32. Again, Avouris continued a trend of unpermitted destruction, construction and

expansion, by demolishing the original garage of the Subject Property without the requisite permitting or any authorization to do so, as required by both the GPW Code and the GPW Zoning Ordinance (see November 10, 2022, code violation of GPW record) (**Exhibit C**, Subject Property BSA).

33. As will be described in the ensuing paragraphs, Avouris commenced substantial and material construction, altering the overall height, setbacks, and overall footprint and lot coverage ratio of the Subject Property Without any stamped and approved permits from Municipal Defendants, without site plan approval, and without any consideration of the GPW Planning Commission or GPW Zoning Board of Appeals, (**Exhibit A, Comparison Photo**).

34. From Avouris' purchase, in or around June 2021, until the initiation of this action, Avouris has been constructing an illegal structure with the implicit support of Municipal Defendants, having (i) issued retroactive permits, (ii) identified construction completed without permits as "complying" with the GPW Code and GPW Zoning Ordinance despite objective violations of same, and (iii) creating intentional blockades and delays in the document production process

II. Deficiencies of the Subject Property, As Constructed.

35. In or around April of 2023, Plaintiff Lint, whose land abuts the Subject Property, noted substantial alterations to the existing grade of the Subject Property. In short, the dwelling on the Subject Property was now elevated on a hill, where no slope previously existed.

36. In a telephonic conversation in or around May of 2023, Municipal Defendants indicated to Plaintiff Lint that plans for the Subject Property in Municipal Defendants' possession did not include additional drainage provisions to mitigate the inevitable increase in surface water runoff onto surrounding properties, as a result of the grade change and dramatic increase in lot

coverage by the new dwelling.

37. The Lint Property and dwelling suffered immediate harm from the increased surface water runoff and increase in grade of the Subject Property without proper remediation.

38. The Lint Property incurred water infiltration through the foundation in Plaintiff Lint's basement (a condition that was not previously occurring) on no less than three (3) occasions after the change in grade (**Exhibit D**, Affidavit of Lint).

39. Plaintiff Lint was forced to demolish portions of Plaintiff Lint's basement and remediate mold where none had existed previously.

40. The aforementioned harm to the Lint Property corroborates and confirms the unpermitted construction of the Subject Property (Avouris constructing without approved plans) and Municipal Defendants' complicit role in the process (not issuing a stop work order or publicly available GPW Code citation, or otherwise enforcing the GPW Code).

41. In the interest of clarity, as it was objectively apparent as of August of 2023 that Avouris had constructed a new dwelling on the Subject Property without the municipal approval to do so, Plaintiffs requested an in person meeting with GPW City Administrator, Frank Schulte ("Schulte") ("Administrator Meeting") (**Exhibit E**, Scheduling correspondence and responses)

42. On September 29, 2023, the date and time scheduled for the Administrator Meeting, Schulte refused to make himself present for his constituents, instead sending an agent from McKenna, a private landscape architectural and urban design firm that frequently contracts services to municipal corporations.

43. Sam Woodrick of McKenna ("Woodrick"), acting as a contractor of Avouris appeared at the Administrator Meeting in Schulte's stead.

44. At the Administrator Meeting, Woodrick affirmed to Plaintiffs Lint, and other

residents who live on North Renaud that were in attendance, that the Subject Property is in compliance with the GPW Code and GPW Zoning Ordinance requirements for both overall structure height and structure setback in the designated R1-A zoning district, however, Woodrick did not offer any documentation or support of this position.

45. After the Administrator Meeting he declined to attend, Schulte, in email, confirms Municipal Defendants' position that the Subject Property complies with all necessary construction requirements (**Exhibit E**, confirming email from Schulte).

46. However, Municipal Defendants commissioned a report from McKenna on compliance of the Subject Property ("McKenna Report") (**Exhibit B**, McKenna Report) that *directly contradicts* Schulte's assertions.

47. The McKenna Report indicates *no less than six (6) violations of the GPW Code and GPW Zoning Ordinance, to wit;*

- a. The newly-constructed garage and front porch of the Subject Property extends into the forty foot (40') front setback, as required by the GPW Code and GPW Zoning Ordinance;
- b. The minimum side yard setback does not total the required twenty-five feet (25');
- c. The maximum building ridge height of 31.4' exceeds the thirty foot (30') ordinance maximum;
- d. The first floor grade elevation is ten inches (10") above the ordinance maximum;
- e. The lot coverage ratio exceeds the ordinance maximum;
- f. The original structure on the Subject Property was a nonconforming

structure that was not in compliance with current front yard and side yard setback requirements; and

g. The Subject Property had ultimately become a full demolition and new construction.

48. Citations and permits associated with the Subject Property indicate in photographs at one point, all that remained of the original dwelling site was a literal “hole in the ground” (**Exhibit C**, pertinent citations from the municipal record).

49. Aerial photographs of the Subject Property pre- and post-Avouris acquisition restate what is obvious to Municipal Defendants and all residents of the neighborhood: that Avouris constructed a new, substantially larger dwelling that materially expanded the size and scope of non-conformance, without the permits or approvals to do so.

50. Avouris was required but has never produced a boundary survey of the Subject Property.

51. Avouris was required but has never produced a plot plan depicting the building envelope and the footprint of the new dwelling entirely within the building envelope.

52. The McKenna Report was only revealed to Plaintiff Lint on or about October 15, 2023, in one of many FOIA requests (multiple because of deficiencies by the Municipal Defendants in the response with each).

53. Upon information and belief, this information was known to Municipal Defendants at the time of the Administrator Meeting.

54. Upon information and belief, Municipal Defendants withheld this information to intentionally create an opportunity for Avouris to attempt to “correct” the numerous intentional GPW Code violations by creating a delay in the transfer of public information to the public, and

encouraging Avouris to seek variances from the GPW Zoning Board for Avouris' violations.

55. On September 26, 2023, Plaintiffs Lint and approximately 12 other residents from North Renaud attended a GPW Planning Commission meeting; and on October 2, 2023, all Plaintiffs attended a GPW City Council meeting after the McKenna Report was known to Municipal Defendants and not disclosed to the Plaintiffs and other concerned citizens attending.

56. On or about October 30, 2023, immediately after Plaintiff Lint received and reviewed the McKenna Report and other documents provided in response to her FOIA request, Schulte emailed Plaintiff Lint indicating that Avouris had amended building plans, submitted new plans, and was seeking GPW Zoning Board variances for three (3) items.

57. As explicitly stated in the McKenna Report, the Subject Property has no less than six (6) self-created zoning violations associated with the unpermitted structure, as well as the loss of any non-conforming use status due to the demolition of the prior dwelling on the Subject Property.

58. The Subject Property evolved from a legally abandoned, non-conforming use, and otherwise is not entitled to variances for the intentional GPW Code violations.

59. Municipal Defendants intentionally withheld public information despite repeated FOIA requests from Plaintiff Lint.

60. The GPW Zoning Board cannot resolve the outstanding nuisances per se and other legal infractions with variances.

61. The prior non-conforming must be deemed legally abandoned and the new existing nuisances per se must be abated through their destruction, and resubmittal of building plans that conform to the GPW Code and GPW Zoning Ordinance through the appropriate and traditional municipal process.

COUNT I – NUISANCE PER SE AS TO THE SUBJECT PROPERTY

62. Plaintiffs incorporate the previous allegations as though fully restated herein.

63. The use of land in violation of local ordinances constitutes a nuisance per se, MCL 125.3407; MSA 5.2963(24).

64. Any violation of a local township zoning ordinance constitutes a nuisance per se and is to be ordered abated by the court upon an action being brought by the officials designated to administer and enforce the ordinance. *See Lamkin v Hamburg Twp. Bd. of Trustees*, 318 Mich App 546, 555–557; 899 NW2d 408, 414–415 (2017).

65. Private landowners have long been entitled to an individual cause of action for enforcement of zoning ordinances: “[the] Supreme Court has long recognized the propriety of private citizens bringing actions to abate public nuisances, arising from the violation of zoning ordinances or otherwise, when the individuals can show damages of a special character distinct and different from the injury suffered by the public generally. *Morse v Liquor Control Comm.*, 319 Mich 52; 29 NW2d 316 (1947); *Plassey vs. Loewenstein & Son*, 330 Mich 525; 48 NW2d 126 (1951). *See also Towne v Harr*, 185 Mich App 230, 232; 460 NW2d 596 (1990); “a party must demonstrate more than a mere increase in traffic” *Unger v Forest Home Twp*, 65 Mich App 614, 617; 237 NW2d 582 (1975).

66. The existence of the nuisance may be established merely by showing a violation of the ordinance. Thus, individuals need not prove a nuisance in fact, as the zoning violation renders the building a nuisance per se. *See Bruggeman v Minster*, 42 Mich App 177; 201 NW2d 344 (1972).

67. The McKenna Report objectively and conclusively indicates that Avouris constructed a non-conforming structure in violation of the GPW Code and GPW Zoning Ordinance

for the expansions of non-conforming use, and code violations previously discussed herein.

68. Plaintiffs Lint and Spies have suffered special harm and damages distinct from the citizenry at large, including but not limited to water runoff and intrusions onto the Lint Property, water damage to their property necessitating mold remediation and demolition of interior elements of the Lint Property.

69. Plaintiffs Lint and Spies are distinct from the citizenry at large as the immediately abutting landowners making contact with a non-conforming property that has numerous health and safety violations present on site.

70. Plaintiff Rinke is distinct from the citizenry at large as he is immediately affected by the violating Subject Property, as being within the three hundred foot (300') notice radius for the Subject Property.

71. Plaintiff Rinke is distinct from the citizenry at large as Plaintiff Rinke has created a public record at Municipal Defendants City Council meetings speaking in opposition to the Subject Property.

72. In the event that the GPW Zoning Board erroneously rules to grant any variances for the Subject Property, Plaintiffs are “aggrieved parties” for purposes of standing to file and intervene in appeals from the GPW Zoning Board to this Circuit Court: a party seeking relief from a decision of a ZBA is not required to demonstrate “standing” but instead must demonstrate to the circuit court acting in an appellate context that he or she is an “aggrieved” party.’ ” *Saugatuck Dunes Coastal Alliance*, unpub. op. at 4, quoting *Olsen*, 325 Mich App at 180-181, 924 N.W.2d 889. *Saugatuck Dunes Coastal All. v. Saugatuck Twp.*, 509 Mich. 561, 574–75, 983 N.W.2d 798, 804–05 (2022)

73. Pursuant to MCL 125.3407 this Court shall order the nuisance abated, and the

owner or agent in charge of the dwelling, building, structure, tent, recreational vehicle, or land is liable for maintaining a nuisance per se.

74. Municipal Defendants cannot grant a variance or otherwise relieve these self-created nuisances.

WHEREFORE, Plaintiffs respectfully request this Court enter an Order:

- A. The subject property is a nuisance;
- B. Order that the nuisances be abated by Defendant Avouris;
- C. Order that the Municipal Defendants abate the nuisances present on the Subject Property;
- D. Order that Defendant Avouris is enjoined from continuing construction on the Subject Property until nuisances are abated;
- E. Order any other relief necessary to abate the nuisances; and
- F. Award legal fees to Plaintiffs.

**COUNT II-DECLARATORY RELIEF-
ABANDONMENT OF NON-CONFORMING USE AND ABATEMENT OF NUISANCE**

75. Plaintiffs incorporate the previous allegations as if fully restated herein.

76. The right to build according to a preferred design is not a substantial property right. *Risko v Grand Haven Charter Twp. Zoning Bd. of Appeals*, 284 Mich App 453, 465; 773 NW2d 730 (2009).

77. Local governmental units possess broad authority to establish requirements regarding matters such as the height of structures and setback regulations. *Id.* at 463, citing MCL 125.3201.

78. The GPW Code states:

Nonconforming uses-

A. Any lawful nonconforming use consisting of a building, existing at the time of the effective date of the ordinance from which this chapter is derived, may be continued, except as prohibited

or restricted in this chapter, provided that the building or use thereof shall not be structurally changed, altered or enlarged unless such altered or enlarged building or use shall conform to the provisions of this chapter for the district in which it is located. No nonconforming use, if changed to a use permitted in the district in which it is located, shall be resumed or changed back to a nonconforming use. *Failure to continue to use any land, building or structure, or part thereof, which use is a nonconforming use under this chapter, for a period of one year or more, shall be held to be conclusive proof of an intention to legally abandon any such nonconforming use.* (Code Sec. 50-7.16)(*Emphasis Added*).

79. As previously discussed herein, more than one (1) year has elapsed, and the Subject Property has lost any non-conforming use status.

80. Although a non-conforming use is permitted to continue, the Zoning Board need not permit a property owner to alter the quality, intensity, or location of a non-conforming use. *City of Troy v Aslanian*, 170 Mich App 523, 526–529; 428 NW2d 703 (1988).

81. The rules governing the construction of statutes apply with equal force to the interpretation of municipal ordinances. *Gora v Ferndale*, 456 Mich 704, 711; 576 NW2d 141 (1998).

82. The primary goal of statutory interpretation is to ascertain and give effect to the intent of the Legislature. *Draprop Corp. v Ann Arbor*, 247 Mich App 410, 415; 636 NW2d 787 (2001).

83. Statutory language should be construed reasonably, keeping in mind the purpose of the act. *Id.*

84. The first consideration in determining legislative intent is the specific language of the statute. *Id.*

85. If the statutory language is clear and unambiguous, judicial construction is neither required nor permitted and courts must apply the statute as written. *Id.*

86. Regarding abatement of non-conforming uses, the GPW Code is unambiguous:

Responsibility for administration and enforcement The provisions of this chapter shall be administered and enforced by a building inspector or administrative official (Code Sec. 50-7.16).

87. Avouris has expanded a non-conforming use.

88. Nonconforming uses shall be abated.

89. Defendant GPW *must* eliminate the nuisance.

90. “Shall” is not discretionary; rather it is an unambiguous requirement the action is taken.

91. The Subject Property harm was completely avoidable by Avouris; they chose to build a structure with this violation.

92. The law charges Avouris with knowing the requirements of the GPW Code and GPW Zoning Ordinance.

93. This Court must order Avouris to abate the nuisance.

WHEREFORE, Plaintiffs respectfully request this Court enter an Order:

A. That the Subject Property is a nuisance;

B. That the current structure on the Subject Property does not enjoy any prior non-conforming use status or protections due to demolition of the original structure and passage of time of more than one (1) year;

C. That Defendant GPW must abate the nuisance;

D. Order that the nuisances be abated by demolition of the home;

E. Order any other relief necessary to abate the nuisances; and

F. Award legal fees to Plaintiffs.

COUNT III-

PETITION FOR SUPERINTENDING CONTROL/WRIT OF MANDAMUS

94. Plaintiffs incorporate the previous allegations as though fully restated herein.

95. Superintending control is directed to a lower court or tribunal, and mandamus is directed to a public official. See *Jones v. Dept. of Corrections*, 468 Mich. 646, 658, 664 N.W.2d 717 (2003), and *In re Payne*, 444 Mich. 679, 687–689, 514 N.W.2d 121 (1994).

96. However, they are so closely related that they are sometimes treated as effectively synonymous.

97. For superintending control to lie, the petitioners must establish that the respondents have failed to perform a clear legal duty *and* the absence of an adequate legal remedy.” *Recorder's Court Bar Ass'n v. Wayne Circuit Court*, 443 Mich. 110, 134, 503 N.W.2d 885 (1993).

98. Both serve as vehicles for compelling the performance of a clear legal duty. *Genesee Prosecutor v. Genesee Circuit Judge*, 386 Mich. 672, 680, 194 N.W.2d 693 (1972).

99. To prevail in an action for mandamus (or superintending control), any legal right held by the plaintiff must be distinct from the legal rights held by citizens generally.

100. As previously discussed herein, Plaintiffs are specially harmed by the Subject Property and violations arising therefrom.

101. The GPW Code unambiguously and conclusively states that the GPW Code must be enforced as written.

102. The GPW Code and its application by Defendant GPW is not discretionary.

103. As previously stated, the GPW zoning administrator *shall* enforce the GPW Code.

104. The Subject Property is not a non-conforming use as over one (1) year has elapsed between Avouris closing on the Subject Property and beginning construction; Avouris building permits have been outstanding for over one (1) year, and Avouris demolished the original structure on the Subject Property, all of which are conclusive proof of abandonment of non-conformity.

105. This Court must direct GPW to enforce its codes and ordinances as written, as GPW has demonstrated it will not enforce its ordinance provisions without judicial intervention.

106. This Court must direct GPW to abate the nuisances present on the Subject Property, as GPW has had ample time and opportunity to do so without judicial intervention, and refuses to

take action to abate the nuisance.

WHEREFORE Plaintiffs respectfully request this Court order:

- A. That GPW must enforce its ordinances as written, and that said ordinances are not discretionary;
- B. That enforcement of the GPW ordinances must result in GPW ordering the Subject Property a nuisance;
- C. That GPW must abate and eliminate any nuisances within its jurisdiction;
- D. That GPW must take action to abate the Subject Property.

COUNT IV-FOIA VIOLATION

107. Plaintiffs incorporate the previous allegations as though fully restated herein.

108. The FOIA is a mechanism through which the public may examine and review the workings of government and its executive officials. *Messenger v Ingham Co. Prosecutor*, 232 Mich App 633, 641; 591 NW2d 393 (1998).

109. By its express terms, the FOIA is a prodisclosure statute; a public body *must disclose all public records* not specifically exempt under the act. *Herald Co. v Bay City*, 463 Mich 111, 119; 614 NW2d 873 (2000); *Scharret, supra* at 411.

110. FOIA was enacted to carry out this state's strong public policy favoring access to government information, recognizing the need for citizens to be informed so that they may fully participate in the democratic process and thereby hold public officials accountable for the manner in which they discharge their duties.

111. Plaintiff Lint has placed numerous FOIA requests with Municipal Defendants (**Exhibit F**, FOIA requests and responses).

112. Each and every response by Municipal Defendants was deficient, and the result of

withheld information as Municipal Defendants attempted to allow retroactive approvals of the Subject Property.

113. In response to Plaintiff Lint's FOIA 23-31, Municipal Defendants produced numerous documents that should have been produced in response to requests months earlier (related to responsive surveys of the Subject Property and building department violations of the Subject Property not contained in other public records).

114. Municipal Defendants produced emails referencing inspections of the Subject Property and did not produce said inspections.

115. Plaintiff Lint had made police reports, which were not produced by Municipal Defendants.

116. This Court must order the full production of the record pertaining to the Subject Property, as Defendants intentionally obscure the public's ability to hold its officials responsible for their public duties.

WHEREFORE, Plaintiffs respectfully request this Court enter an Order:

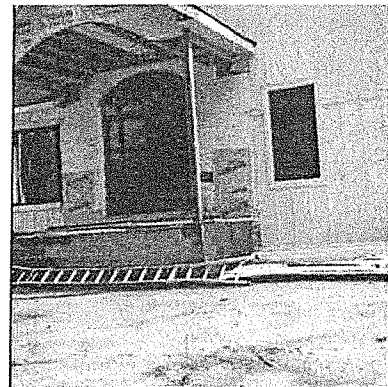
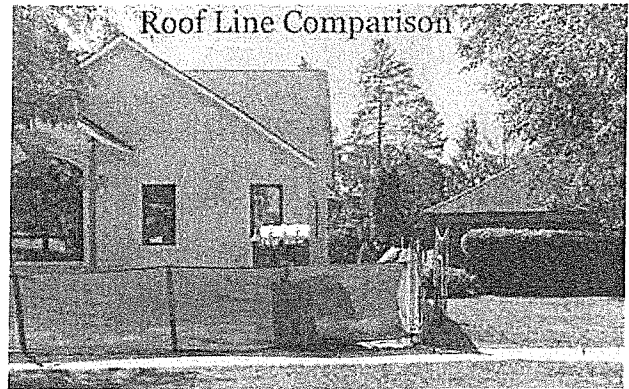
- A. The subject property is a nuisance;
- B. Order that the nuisances be abated by demolition of the home;
- C. Order any other relief necessary to abate the nuisances; and
- D. Award legal fees to Plaintiffs.

LINNELL & ASSOCIATES, PLLC

Dated: November 17, 2023

/s/ Richard D. Linnell
By: RICHARD D. LINNELL (P59339)
DAVID H. APPLEBAUM (P78794)
Attorneys for Plaintiffs
2804 Orchard Lake Rd., Ste. 203
Keego Harbor, Michigan 48320
Telephone: (248) 977-4182

EXHIBIT A

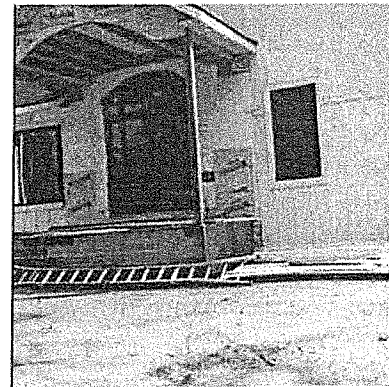
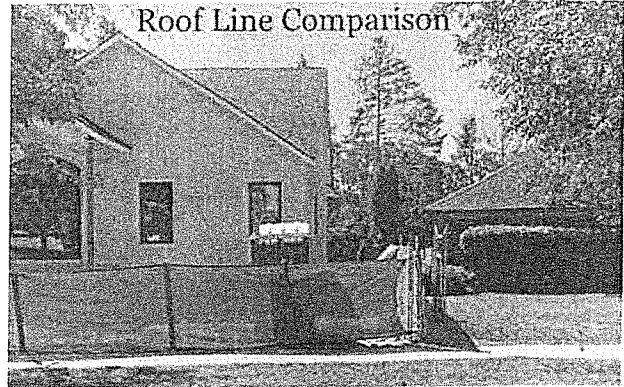


Join Your Neighbors in Expressing Concerns and Requesting ACTION at the GPW City Council Meeting Tuesday, September 26, 2023 - 7:00pm

707 N. RENAUD DOES NOT MEET STANDARDS

- Barn-like surface structure completely replaced single story 1950's ranch
- Home is not consistent with other homes in the neighborhood
- Structure size significantly exceeds the permitted size for the neighborhood (Current code is 35% of lot size)
- Existing permit is for a remodel valued at \$150k and does not represent the NEW construction of the structure
- First floor of structure is raised several feet above ground exceeding permitted level
- Altered existing grade of yard which has been sloped towards adjacent properties resulting in standing water and runoff INTO the adjacent properties
- Construction permit, which expired once, will be up for reconsideration in October 2023
- Will NOT receive tax value based on new construction





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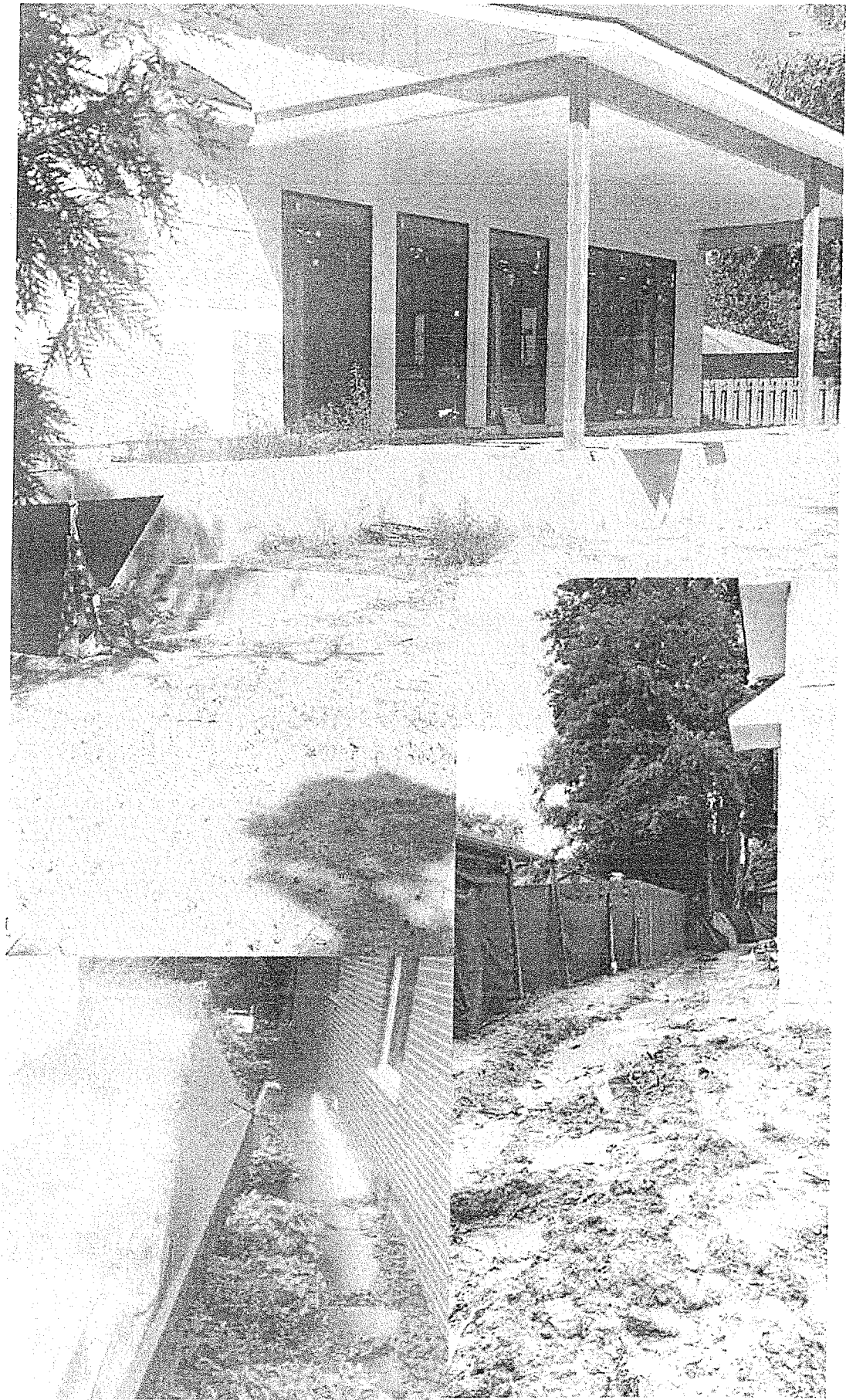
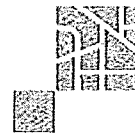


EXHIBIT B

Questions ?

Lintcl@yahoo.com



MCKENNA

September 26, 2023

City of Grosse Pointe Woods
20025 Mack Plaza Dr
Grosse Pointe Woods, MI 48236

SUBJECT: 707 N RENAUD ZONING REVIEW AND VARIANCE OVERVIEW
ZONING: R-1A ONE-FAMILY RESIDENTIAL
APPLICANT: NICOLAS & ALANNA AVOURIS, PROPERTY OWNERS

Dear City Administration:

We have reviewed an updated site plan prepared by Fenn & Associates for Nicholas D. Avouris Designs for the renovation of a single-family home at 707 N Renaud in the R-1A Residential District. The Building Department received the updated Site Plan on September 26, 2023. This site plan and building footprint received has changed from the original site plan that was submitted to the GPW Building Department on July 14, 2022. Nevertheless, the house in its form before the renovations, was a nonconforming structure due to its noncompliance with the 40-foot front yard setback and 25-foot total side yard setbacks. Any additions or expansions of nonconforming structures, including nonconforming residential structures, must be reviewed by the Zoning Board of Appeals. This review letter highlights the additional components that do not comply with the R-1A District standards of the Zoning Ordinance that went into effect on May 15, 2022. The applicant needs multiple variances from the Zoning Board of Appeals.

Aerial Image of 707 N Renaud



Zoning Map

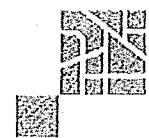


PLAN DETAILS

DETROIT
1938 Franklin Street
Suite 203
Detroit, Michigan 48207

☎ 313.888.9882
☎ 248.596.0930
MCKA.COM

Communities for real life.



This review is based on the revised demo plans and elevation drawings dated June 29, 2022, revised on September 15, 2022 and the floor plan dated December 10, 2021. The floor plan indicates that the existing building footprint, which was a noncompliant structure due to noncompliance with the front and side yard setbacks, was expanded and a screened in porch (lanai) was added in the rear of the building without approval from the Zoning Board of Appeals. Additional components of the proposed renovations that ultimately become a full demolition and new construction, that is now near completion, do not comply with standards of the Zoning Ordinance. The table below details the components out of compliance with Ordinance requirements.

DIMENSIONAL REQUIREMENTS

Standard	Requirement	Prior Conditions	New Conditions	Compliance
Minimum Front Setback*	40'	<40', the Garage extends past the 40' setback. Nonconforming.	<40', the Garage and the open front porch extends past the 40' setback	No
Minimum Side Setback	10' for at least one side; 25 ft minimum for each side	10', <15' Does not total to the min. 25'. Nonconforming.	10', <15' Does not total to the min. 25'	No
Minimum Rear Setback	28'	>28'	>28'	Yes
Maximum Building Height	2.5 stories or 30'	Unknown at this time.	31'4" Ridge Height	No
Finish Grade Line / Building Grade Line	<12' >18' from the front sidewalk	Unknown at this time.	To be provided.	TBD
First Floor Elevation**	<6" >26" above the finish grade line	Unknown at this time.	3'	No
Lot Size	8,500 sq.ft.	Unknown at this time.	90' by 145' = 13,050 ft ²	Yes
Lot Coverage***	35%	<32%	Home w/o Lanai = 4,211.476 ft ² or 32% Home w/ Lanai = 4,869.066 ft ² or 37%	No, not with the lanai at the rear end of the house

*Section 50-5.14, "porches, platforms, balconies, ... attached garages and other projections shall be considered as part of the building and not as a part of the yards or courts or unoccupied spaces." "The building inspector may permit encroachments or extensions into the front or rear yard provided such structures do not extend more than 30 inches from the main wall of the building, do not in the aggregate occupy more than 20 percent of the length of such wall, and do not interfere with the light or ventilation of any room used as a dwelling. This section shall not apply to unenclosed outside porches not exceeding one story in height which do not extend into the required front yard farther than eight feet or into the rear yard farther than 12 feet."

**First floor elevation is the height that the first floor extends above the building grade line/finish grade line, which is elevation of the ground adjoining the building on all four sides.

***Lot Coverage means the part or percent of the lot occupied by buildings or structures, including accessory buildings or structures and above ground and permanent swimming pools.

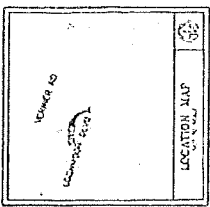


Findings: The addition expanding the residential home and the lanai (screened in porch) do not comply with various components of the Zoning Ordinance: It exceeds the front and side yard setbacks, allowed lot coverage, first floor elevation, and building height allowed by-right in the R-1A District. The Building Official may permit the extension of the garage into the front yard setback as it does not exceed 8-feet past the required front yard setback; however, they may not permit the extension of the open porch into the front yard as is because it extends 8-feet past the required setback. The front open porch must also be considered by the Zoning Board of Appeals. The ZBA must review and consider these design elements that do not comply with the Ordinance. This renovation is of a nonconforming structure that does not comply with the Ordinance, variances are needed.

Respectfully submitted,

MCKENNA

Brigitte Wolf, AICP

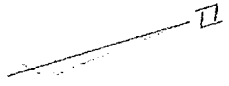


1. THIS PLAN IS SUBJECT TO ALL APPLICABLE ORDINANCES AND REGULATIONS OF THE CITY OF LOS ANGELES.

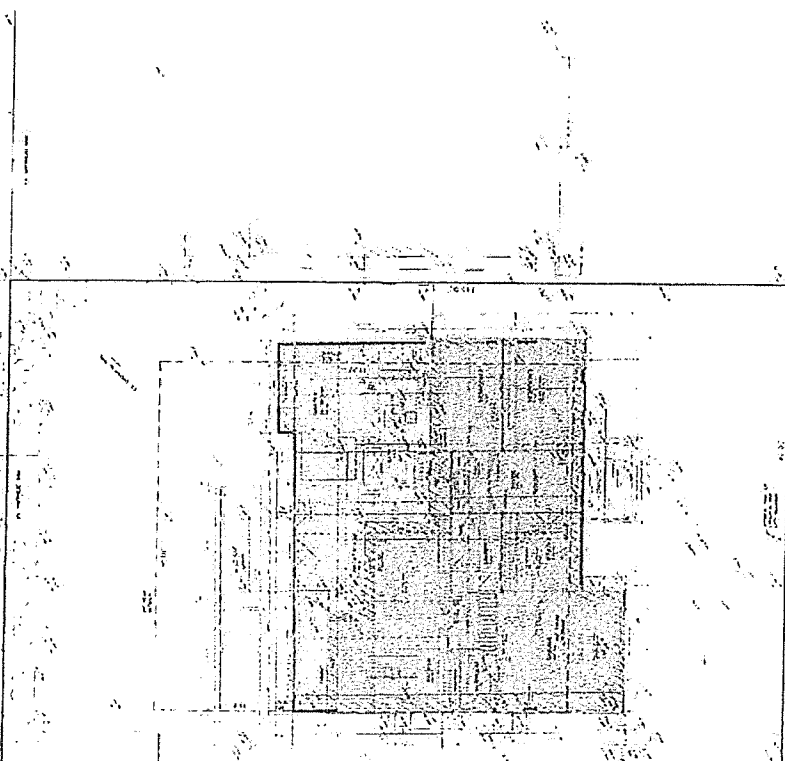
LEGEND table with 2 columns: Symbol and Description. Includes items like 'EXISTING LOT LINES', 'EXISTING BUILDING FOOTPRINT', 'PROPOSED LOT LINES', 'PROPOSED BUILDING FOOTPRINT', 'PROPOSED DRIVEWAY', 'PROPOSED SIDEWALK', 'PROPOSED CURB', 'PROPOSED DRIVEWAY CURB', 'PROPOSED SIDEWALK CURB', 'PROPOSED DRIVEWAY WALKWAY', 'PROPOSED SIDEWALK WALKWAY', 'PROPOSED DRIVEWAY WALKWAY CURB', 'PROPOSED SIDEWALK WALKWAY CURB', 'PROPOSED DRIVEWAY WALKWAY CURB', 'PROPOSED SIDEWALK WALKWAY CURB', 'PROPOSED DRIVEWAY WALKWAY CURB', 'PROPOSED SIDEWALK WALKWAY CURB'.

Table with 2 columns: Item and Description. Lists various site details and materials.

ALL DIMENSIONS ARE IN FEET AND INCHES. DIMENSIONS SHALL BE TO FACE UNLESS OTHERWISE NOTED.



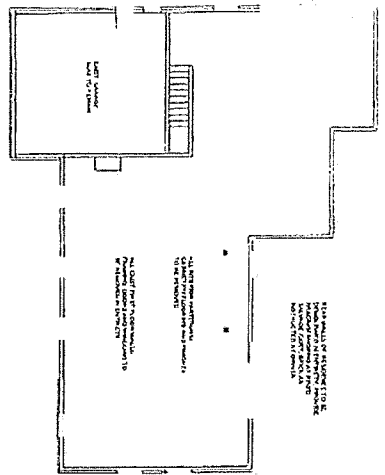
1. ALL DIMENSIONS ARE TO FACE UNLESS OTHERWISE NOTED.



1. ALL DIMENSIONS ARE TO FACE UNLESS OTHERWISE NOTED.

Professional seal and title block for a Licensed Architect. Includes the name 'FRANK & ANTHONY, Inc.', the title 'ARCHITECT', and the license number '45897'. Also includes the address '1001 WEST 18TH STREET, SUITE 200, LOS ANGELES, CA 90057' and phone number '310-204-2100'.

FIRST FLOOR DEMO PLAN



GENERAL REQUIREMENTS

1. ALL DEMOLITION WORK SHALL BE IN ACCORDANCE WITH THE CITY OF SEATTLE DEPARTMENT OF PUBLIC WORKS, DIVISION OF CONSTRUCTION, DEMOLITION REGULATIONS.

2. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE CITY OF SEATTLE.

3. THE CONTRACTOR SHALL MAINTAIN ACCESS TO ALL ADJACENT PROPERTIES AND PUBLIC UTILITIES AT ALL TIMES.

4. ALL DEMOLITION DEBRIS SHALL BE PROPERLY DISPOSED OF AT AN APPROVED LOCATION.

5. THE CONTRACTOR SHALL PROTECT ALL EXISTING STRUCTURES AND UTILITIES TO REMAIN.

6. ALL WORK SHALL BE COMPLETED WITHIN THE SPECIFIED TIME FRAME.

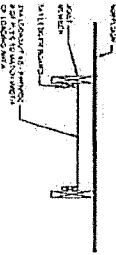
ELECTRICAL SCHEDULE

NO.	DESCRIPTION	QTY	UNIT
1	DEMOLITION OF EXISTING ELECTRICAL PANELS	2	PANELS
2	DEMOLITION OF EXISTING WIRING	100	LINEAL FEET
3	DEMOLITION OF EXISTING LIGHT FIXTURES	10	FIXTURES
4	DEMOLITION OF EXISTING SWITCHES	5	SWITCHES
5	DEMOLITION OF EXISTING OUTLETS	10	OUTLETS

AVIATION SCHEDULE

NO.	DESCRIPTION	QTY	UNIT
1	DEMOLITION OF EXISTING AVIATION EQUIPMENT	1	UNIT
2	DEMOLITION OF EXISTING AVIATION STRUCTURES	1	STRUCTURE

TYPICAL BLOCKING LADDER DETAIL



GENERAL NOTES

1. ALL WORK SHALL BE IN ACCORDANCE WITH THE CITY OF SEATTLE DEPARTMENT OF PUBLIC WORKS, DIVISION OF CONSTRUCTION, DEMOLITION REGULATIONS.

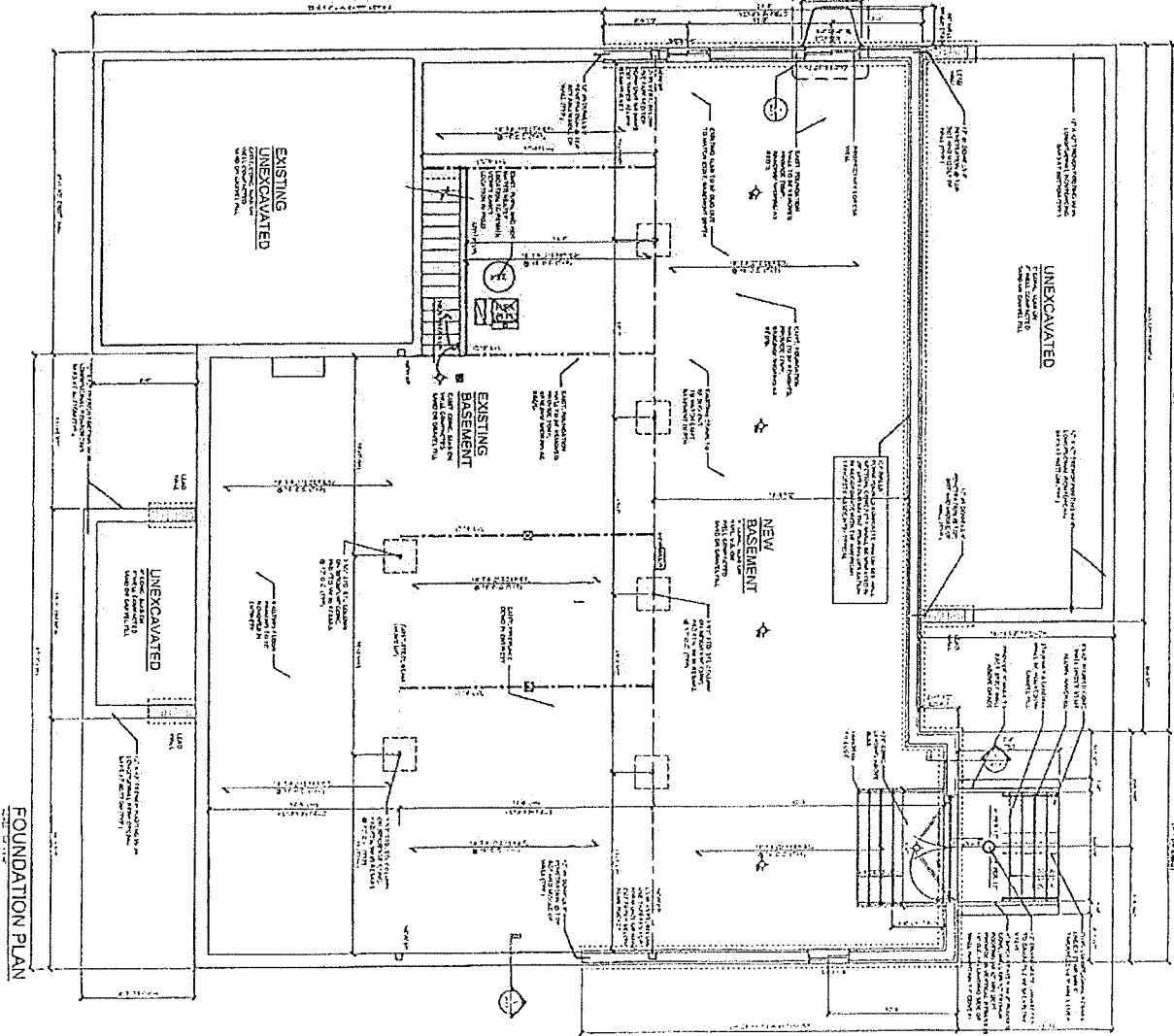
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5. THE CONTRACTOR SHALL PROTECT ALL EXISTING STRUCTURES AND UTILITIES TO REMAIN.

6. ALL WORK SHALL BE COMPLETED WITHIN THE SPECIFIED TIME FRAME.



FOUNDATION PLAN

RENAUD ADDITION

DATE: 08/20/2024

PROJECT NO: 23044

SCALE: AS SHOWN

DESIGNED BY: [Name]

CHECKED BY: [Name]

APPROVED BY: [Name]

LEGEND

- SCHEMATIC
- ▨ RECORD
- ▩ SURVEY
- ▧ CONSTRUCTION
- OTHER

DATE: 08/20/2024

PROJECT NO: 23044

SCALE: AS SHOWN

DESIGNED BY: [Name]

CHECKED BY: [Name]

APPROVED BY: [Name]

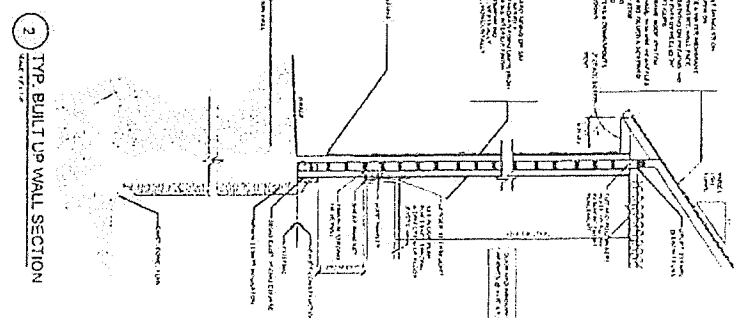
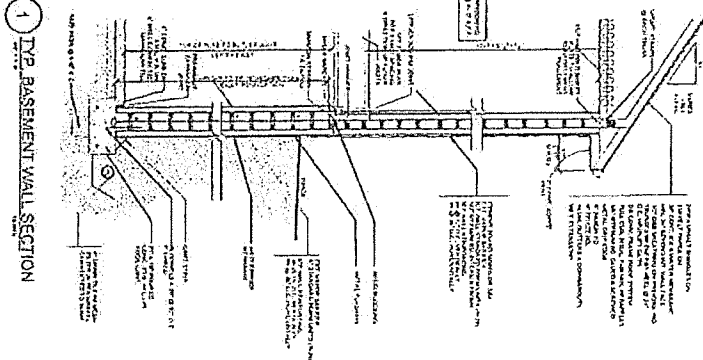
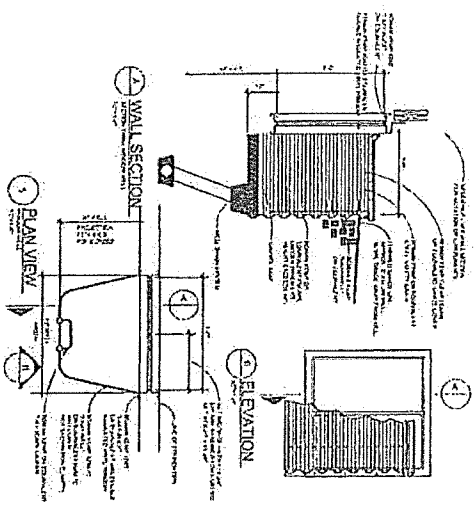
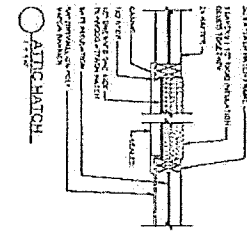
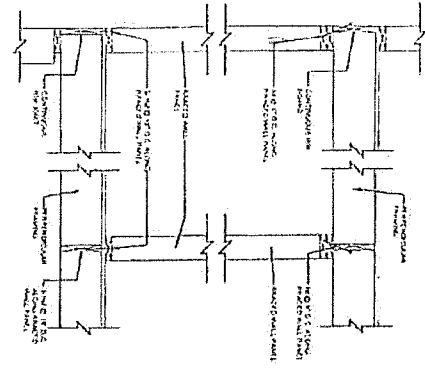
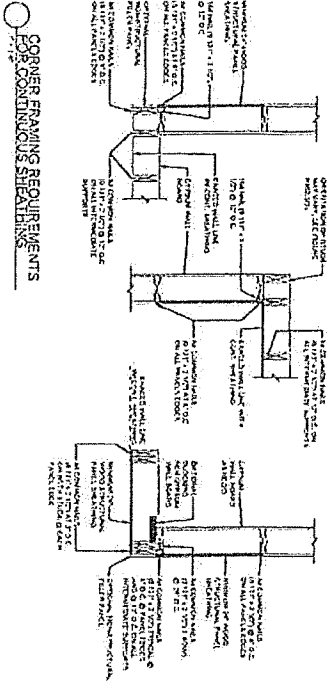
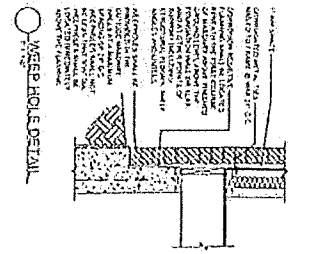
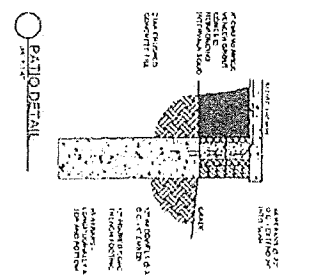


RENAUD ADDITION

THINK IT THROUGH
PLAN IT RIGHT
BUILD IT BETTER

□	CONCRETE
■	FOUNDATION
▒	BRICK
▓	CONCRETE BLOCK
◆	WOOD
▲	GLASS
●	SMOOTH METAL
○	ROUGH METAL
◊	MASONRY
◇	INSULATION
▽	MECHANICAL
○	ELECTRICAL
□	PARTITION
■	WALL
▒	CEILING
▓	FLOOR
◆	ROOF
▲	LANDSCAPE
●	PAINT
○	FINISH
◊	OTHER
◇	CLADDING
▽	MECHANICAL
○	ELECTRICAL
□	PARTITION
■	WALL
▒	CEILING
▓	FLOOR
◆	ROOF
▲	LANDSCAPE
●	PAINT
○	FINISH
◊	OTHER
◇	CLADDING

A11
2004



STAIRWAY NOTES AND DETAILS

STAIR SECTION

TYPICAL RAILING DETAIL

STAIR SECTION

TYPICAL RAILING DETAIL

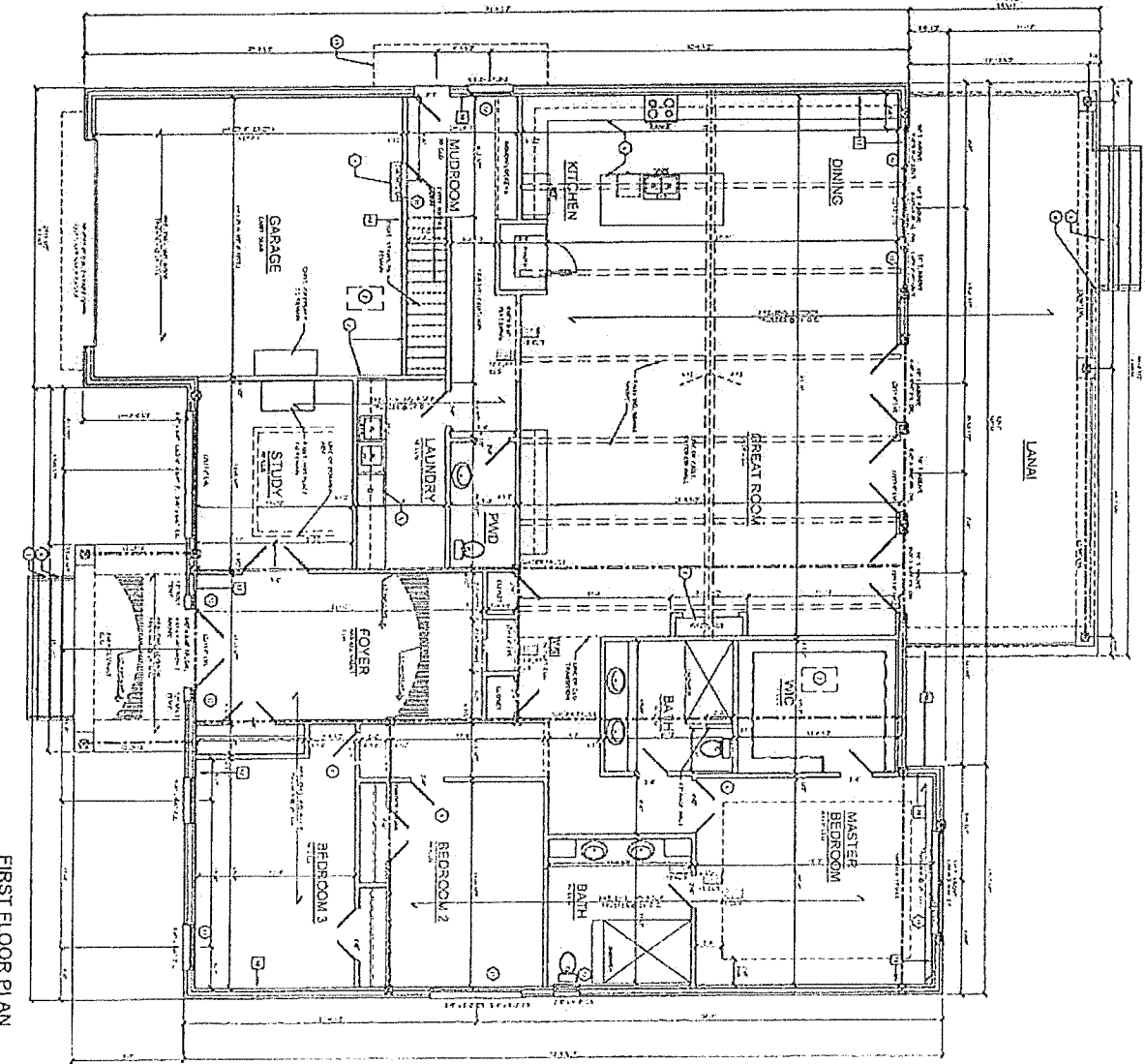
STRUCTURAL FINISHES

1	CONCRETE	2	PLASTER
3	PAINT	4	WOOD FINISH
5	GLASS	6	CEILING FINISH
7	FLOOR FINISH	8	WALL FINISH

- KEYED FLOOR PLAN NOTES**
1. FINISHES TO BE SHOWN ON THIS PLAN ARE TO BE USED UNLESS OTHERWISE NOTED.
 2. ALL FINISHES TO BE SHOWN ON THIS PLAN ARE TO BE USED UNLESS OTHERWISE NOTED.
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 19. ALL FINISHES TO BE SHOWN ON THIS PLAN ARE TO BE USED UNLESS OTHERWISE NOTED.
 20. ALL FINISHES TO BE SHOWN ON THIS PLAN ARE TO BE USED UNLESS OTHERWISE NOTED.

GENERAL EQUIPMENT SCHEDULE

1	REFRIGERATOR	2	DISHWASHER
3	STOVE	4	SINK
5	WASHER	6	DRYER
7	WATER HEATER	8	AC UNIT
9	EXHAUST FAN	10	CEILING FAN
11	STOVE	12	REFRIGERATOR
13	DISHWASHER	14	STOVE
15	SINK	16	WASHER
17	DRYER	18	WATER HEATER
19	AC UNIT	20	EXHAUST FAN
21	CEILING FAN	22	STOVE
23	REFRIGERATOR	24	DISHWASHER
25	STOVE	26	SINK
27	WASHER	28	DRYER
29	WATER HEATER	30	AC UNIT
31	EXHAUST FAN	32	CEILING FAN
33	STOVE	34	REFRIGERATOR
35	DISHWASHER	36	STOVE
37	SINK	38	WASHER
39	DRYER	40	WATER HEATER
41	AC UNIT	42	EXHAUST FAN
43	CEILING FAN	44	STOVE
45	REFRIGERATOR	46	DISHWASHER
47	STOVE	48	SINK
49	WASHER	50	DRYER
51	WATER HEATER	52	AC UNIT
53	EXHAUST FAN	54	CEILING FAN
55	STOVE	56	REFRIGERATOR
57	DISHWASHER	58	STOVE
59	SINK	60	WASHER
61	DRYER	62	WATER HEATER
63	AC UNIT	64	EXHAUST FAN
65	CEILING FAN	66	STOVE
67	REFRIGERATOR	68	DISHWASHER
69	STOVE	70	SINK
71	WASHER	72	DRYER
73	WATER HEATER	74	AC UNIT
75	EXHAUST FAN	76	CEILING FAN
77	STOVE	78	REFRIGERATOR
79	DISHWASHER	80	STOVE
81	SINK	82	WASHER
83	DRYER	84	WATER HEATER
85	AC UNIT	86	EXHAUST FAN
87	CEILING FAN	88	STOVE
89	REFRIGERATOR	90	DISHWASHER
91	STOVE	92	SINK
93	WASHER	94	DRYER
95	WATER HEATER	96	AC UNIT
97	EXHAUST FAN	98	CEILING FAN
99	STOVE	100	REFRIGERATOR



FIRST FLOOR PLAN

RENAUD ADDITION

DATE: 11/11/2004

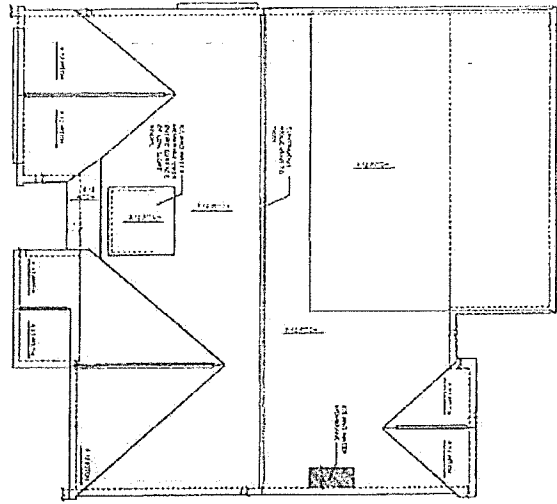
PROJECT: RENAUD ADDITION

OWNER: [REDACTED]

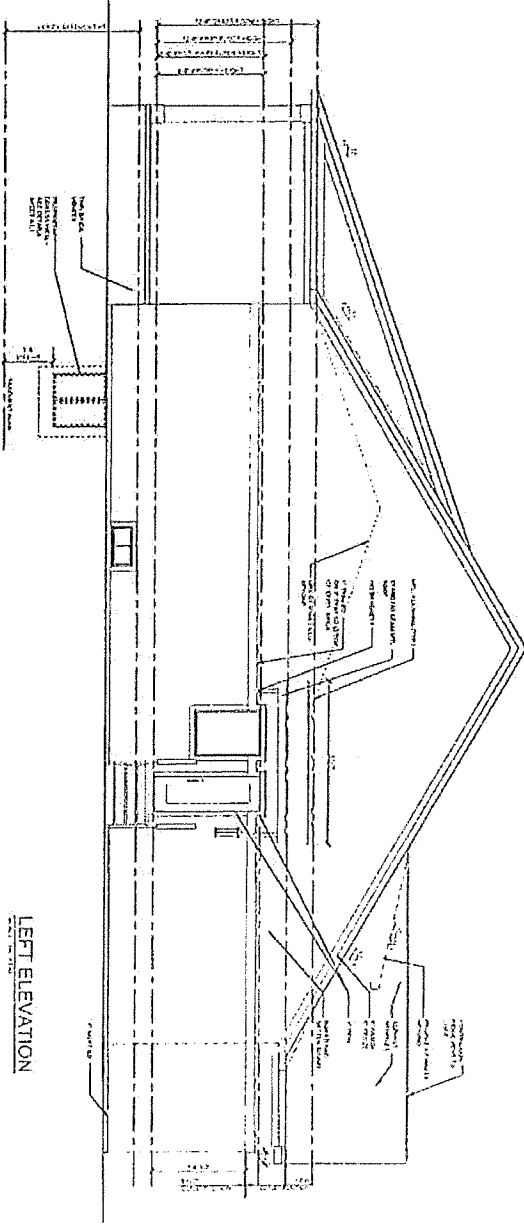
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SCALE: 1/8" = 1'-0"

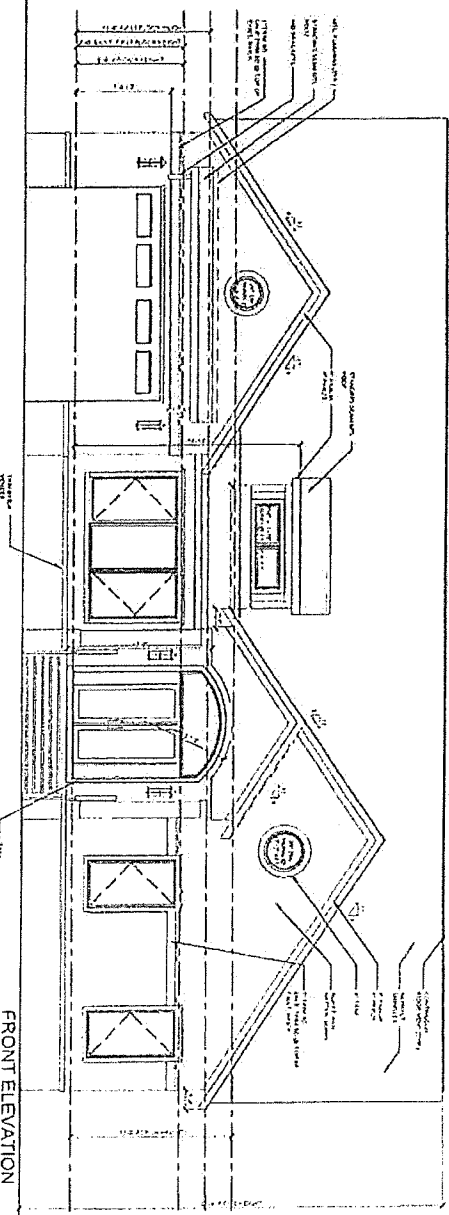
NO. 102004



ROOF PLAN



LEFT ELEVATION



FRONT ELEVATION

RENAUD ADDITION

PROJECT INFORMATION

PROJECT NO. 22034

DATE: 03/2014

SCALE: AS SHOWN

DESIGNED BY: [Name]

DRAWN BY: [Name]

CHECKED BY: [Name]

APPROVED BY: [Name]

NOTES

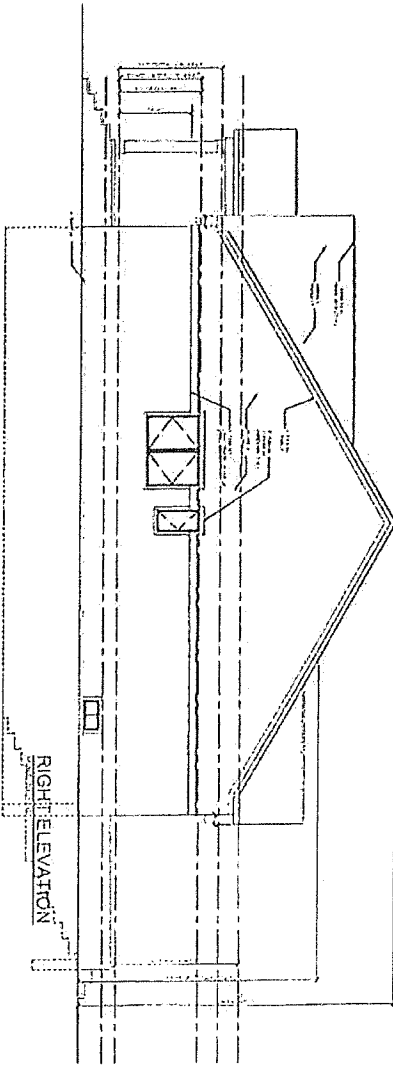
1. REFER TO SHEET 22034-1 FOR EXISTING CONDITIONS.
2. ALL DIMENSIONS ARE UNLESS OTHERWISE NOTED.
3. MATERIALS TO BE USED AS SHOWN ON SHEET 22034-2.
4. SEE NOTES ON SHEET 22034-3 FOR FINISHES.
5. ALL WORK TO BE IN ACCORDANCE WITH THE 2012 IRC.
6. PERMIT REQUIRED.

DATE: 03/2014

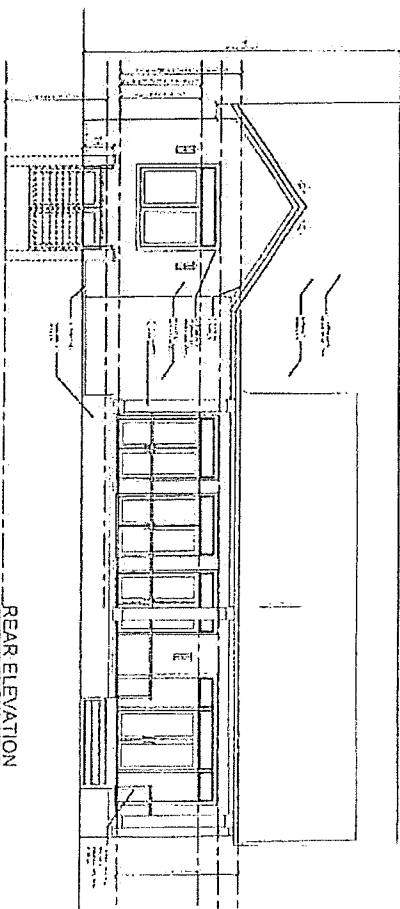
SCALE: AS SHOWN

PROJECT NO. 22034

A3



RIGHT ELEVATION



REAR ELEVATION



RENAUD ADDITION

THOMAS R. GORDON
 ARCHITECT
 1000 W. 10th St.
 S.W. Oklahoma City, Oklahoma 73106
 Phone: (405) 233-1111
 Fax: (405) 233-1112

NO.	DATE	DESCRIPTION
1	01-20-02	PRELIMINARY
2	01-20-02	PERMITS
3	01-20-02	CONSTRUCTION
4	01-20-02	FINAL
5	01-20-02	AS SHOWN

PROJECT NO. 23312
 SHEET NO. A4
 TOTAL SHEETS 23312

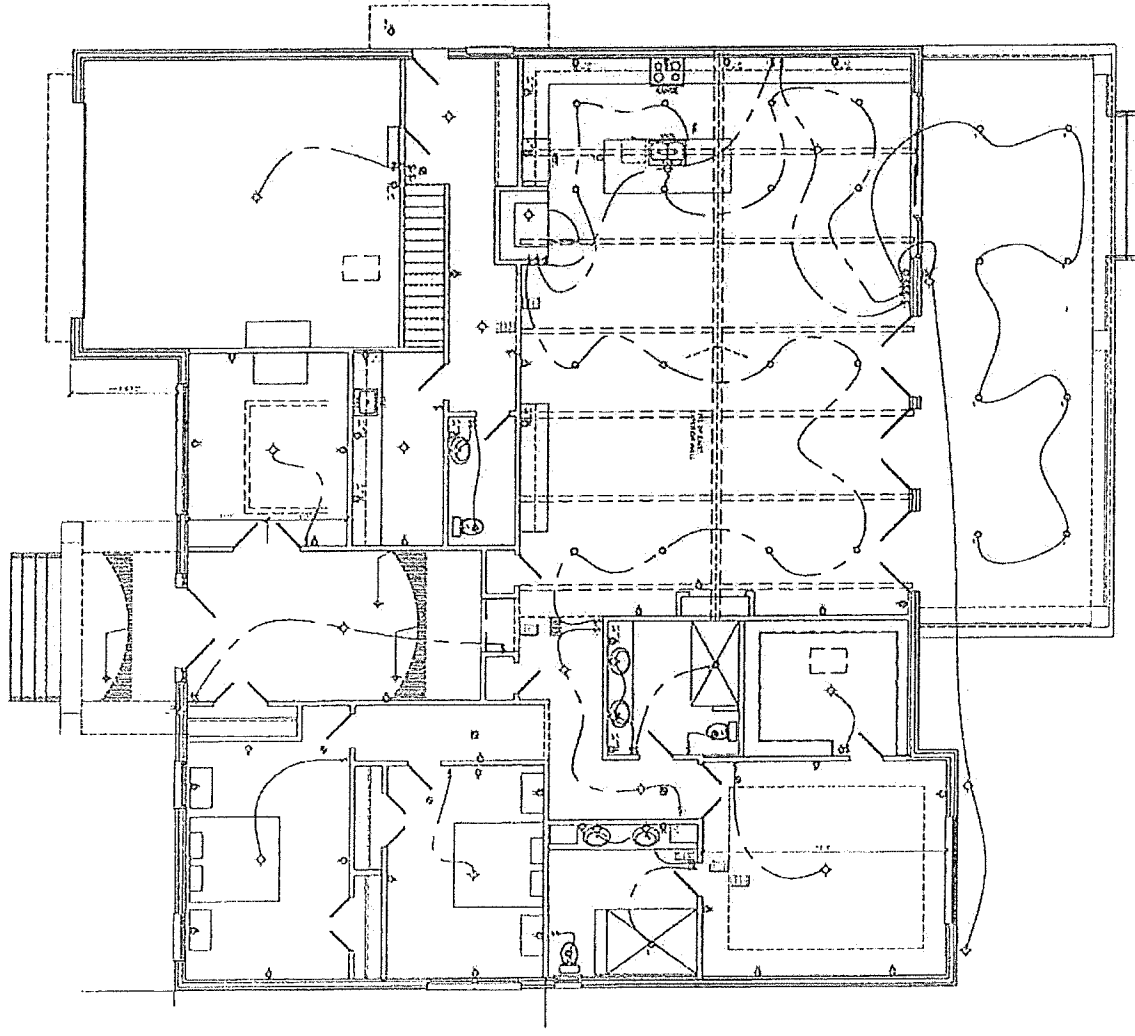
GENERAL NOTES:

1. ALL WORK SHALL BE IN ACCORDANCE WITH THE NATIONAL ELECTRICAL CODE (NEC) AND THE NATIONAL FIRE ALARM AND SIGNAL CODE (NFPA 72).
2. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND INSURANCE.
3. ALL MATERIALS AND WORKMANSHIP SHALL BE SUBJECT TO INSPECTION AND APPROVAL BY THE LOCAL ELECTRICAL INSPECTOR.
4. THE CONTRACTOR SHALL MAINTAIN ACCESS TO ALL EXISTING UTILITIES AND STRUCTURES.
5. ALL ELECTRICAL WORK SHALL BE IDENTIFIED BY COLOR-CODED WIRING AND LABELING.
6. THE CONTRACTOR SHALL PROVIDE A COMPLETE AS-BUILT DRAWING SET UPON COMPLETION OF THE PROJECT.
7. ALL ELECTRICAL PANELS SHALL BE INSTALLED IN ACCORDANCE WITH THE MANUFACTURER'S INSTRUCTIONS.
8. THE CONTRACTOR SHALL PROTECT ALL EXISTING ELECTRICAL SYSTEMS AND STRUCTURES.
9. ALL ELECTRICAL WORK SHALL BE COMPLETED WITHIN THE SPECIFIED TIME FRAME.
10. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE SAFETY OF ALL WORKERS AND THE PUBLIC.

LEGEND:

○	Light Fixture
□	Outlet
◇	Switch
■	Panel
—	Wire
—	Conduit
—	Ground
—	Panel Schedule
—	Panel Location
—	Panel Schedule
—	Panel Location

FIRST FLOOR ELECTRIC PLAN



REVISIONS:

NO.	DATE	DESCRIPTION
1	06-05-20	ISSUED FOR PERMITS
2	06-05-20	ISSUED FOR CONSTRUCTION
3	06-05-20	ISSUED FOR AS-BUILT

PROJECT INFORMATION:

PROJECT NO. 20094

DATE: 06-05-20

SCALE: 1/8" = 1'-0"

DRAWN BY: [Name]

CHECKED BY: [Name]

CLIENT INFORMATION:

CLIENT NAME: [Name]

CLIENT ADDRESS: [Address]

CLIENT PHONE: [Phone]

CLIENT FAX: [Fax]

CLIENT EMAIL: [Email]

RENAUD ADDITION

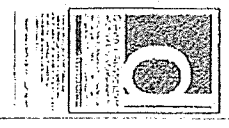
PROJECT NO. 20094

DATE: 06-05-20

SCALE: 1/8" = 1'-0"

DRAWN BY: [Name]

CHECKED BY: [Name]





06/23/2023

Dear and AVOURIS, NICHOLAS D - ALANNA:

Expired Building Permit PB220396 to expire at 707 N RENAUD RD on 08/22/2023 for Demo only for remodel of entire home by homeowner Alanna Avouris..

Please be advised that the above subject permits will be expiring within 30 days and a final inspection is required. Failure to schedule final inspections may result in tickets or fines.

Permits may be extended once for a timeframe of 90 days, if you would like to request an extension or to speak to a Building Department staff member please contact our office at 313-343-2426.

Sincerely,

Grosse Pointe Woods Building Department
building@gpwmi.us
313.343.2426



07/24/2023

Dear and AVOURIS, NICHOLAS D - ALANNA:

Expired Building Permit PB220396 to expire at 707 N RENAUD RD on 08/22/2023 for Demo only for remodel of entire home by homeowner Alanna Avouris..

Please be advised that the above subject permits will be expiring within 30 days and a final inspection is required. Failure to schedule final inspections may result in tickets or fines.

Permits may be extended once for a timeframe of 90 days, if you would like to request an extension or to speak to a Building Department staff member please contact our office at 313-343-2426.

Sincerely,

Grosse Pointe Woods Building Department
building@gpwmi.us
313.343.2426



08/25/2023

Dear and AVOURIS, NICHOLAS D - ALANNA:

Expired Building Permit PB220396 to expire at 707 N RENAUD RD on 10/24/2023 for Demo only for remodel of entire home by homeowner Alanna Avouris.

EXTENDED 90 DAYS ON 7/24/23. MRM.

Please be advised that the above subject permits will be expiring within 30 days and a final inspection is required. Failure to schedule final inspections may result in tickets or fines.

Permits may be extended once for a timeframe of 90 days, if you would like to request an extension or to speak to a Building Department staff member please contact our office at 313-343-2426.

Sincerely,

Grosse Pointe Woods Building Department
building@gpwmi.us
313.343.2426



09/25/2023

Dear and AVOURIS, NICHOLAS D - ALANNA:

Expired Building Permit PB220396 to expire at 707 N RENAUD RD on 10/24/2023 for Demo only for remodel of entire home by homeowner Alanna Avouris.

EXTENDED 90 DAYS ON 7/24/23. MRM.

Please be advised that the above subject permits will be expiring within 30 days and a final inspection is required. Failure to schedule final inspections may result in tickets or fines.

Permits may be extended once for a timeframe of 90 days, if you would like to request an extension or to speak to a Building Department staff member please contact our office at 313-343-2426.

Sincerely,

Grosse Pointe Woods Building Department
building@gpwmi.us
313.343.2426

From: Christal Lint lintcl@yahoo.com
Subject: For your investigation Re 707 N Renaud
Date: Oct 3, 2023 at 9:38:30 AM
To: Debra Walling dwalling@rsjalaw.com, Tim Tomlinson
TTomlinson@yorkdolanlaw.com

Good morning,

Earlier this morning, I followed up with Mr Tomlinson regarding a downspout violation I reported last week at 707. As I stated at last night's council meeting, last week 707 slapped downspouts onto the structure facing my property and the property on the other side. It occurred to me that not only with respect to this violation but some of the other more serious violations you're investigating, that the owner knows what's required of the code because he's renovated other homes in the neighborhood.

One such home is 871 N Renaud. In connection with a permit to replace a roof on that house a few years ago, he was explicitly instructed that downspouts face the front and back of the property, and not the sides. As I looked more into 871 N Renaud, there are a number of other issues you should be aware of. Most importantly, although the permit granted was for the roof, 871 was a massive renovation project for which no permits were applied for and granted. See the listing description from the sale just last year here https://www.zillow.com/homedetails/871-N-Renaud-Rd-Grosse-Pointe-Woods-MI-48236/88388278_zpid/.

In talking with the neighbor next door to 871, I understand that the interior work was not the only work done. I was informed that house was significantly expanded upon in the back. The sale listing above seems to corroborate this as the home is listed for sale at over 5000 sq feet; obviously a home in this neighborhood built in the 1950s was not built to be of that size. I'm sure you have access to records to confirm all of this.

I don't think I need to detail for you the parallels between 871 and 707. I do have to point out that the owner clearly has a history of successfully evading the zoning ordinance and oversight of the building department. I also think it's worth noting that permit information is, as per state guidelines, the primary manner in which property taxes are assessed. So in addition to zoning violations, the owner is permitted to evade full tax responsibility while the rest of the community who follows the law pays their full freight.

The adverse consequences to the neighborhood if the City does not take firm and immediate action on 707 cannot be understated. I do plan to continue my investigation with the limited tool available to me and will continue to share what I find with you.

Best regards,
Christal

Sent from my iPhone

EXHIBIT C

Enforcement Information

[Back To Top](#)

Amount Due
 Enforcement - Building Permits Total **\$0.00**

Number: E220441 Status: Case Closed

Category: Building Permits

Date Filed: 04/14/2022

Date Closed: 04/20/2022

Last Action Date: *No Data to Display*

Next Action Date: *No Data to Display*

Complaint:

Renovating inside of the home. No permits. See pics. 2 commercial dumpsters at the property.

Inspection Information

[Back To Top](#)

Inspection Type	Inspector	Status	Scheduled Date	Completed Date	Result
Ordinance	Not Available	Completed	4/14/2022	4/14/2022	Violation(s) View
Compliance	Not Available	Completed	4/20/2022	4/20/2022	Completed View

Fees & Payments

[Back To Top](#)

Date	Action	Qty	Description	Billed	Paid
------	--------	-----	-------------	--------	------

Enforcement Information

[Back To Top](#)

Amount Due
 Enforcement - Building Permits Total **\$0.00**

Number: E221138
 Category: Building Permits
 Status: Case Closed
 Date Filed: 10/10/2022
 Date Closed: 10/17/2022
 Last Action Date: *No Data to Display*
 Next Action Date: *No Data to Display*

Complaint: No permit to demo the garage

Inspection Information

[Back To Top](#)

Inspection Type	Inspector	Status	Scheduled Date	Completed Date	Result
Ordinance	<i>Not Available</i>	Completed	10/10/2022	10/10/2022	Violation(s) View
Compliance	<i>Not Available</i>	Completed	10/17/2022	10/17/2022	No Violation View

Fees & Payments

[Back To Top](#)

Date	Action	Qty	Description	Billed	Paid

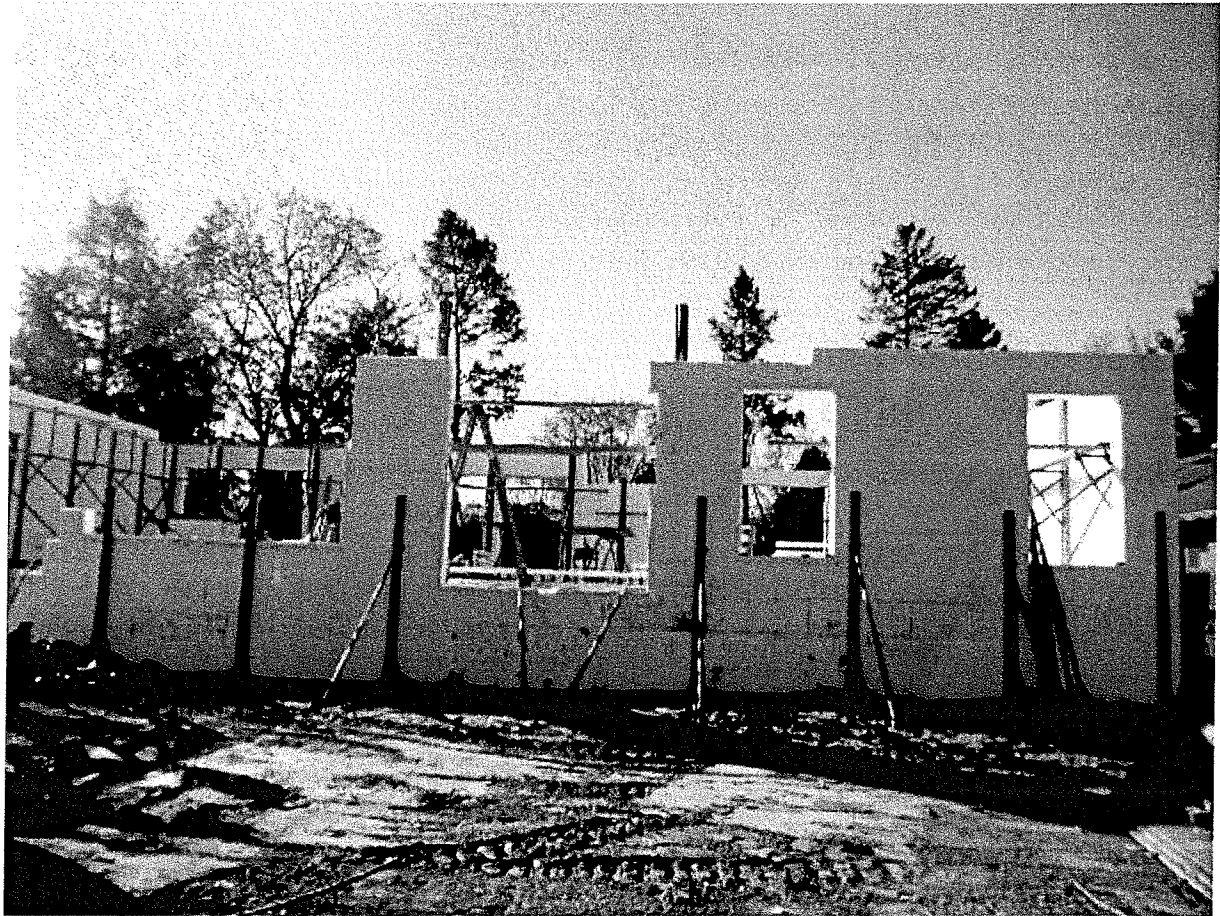


EXHIBIT D

STATE OF MICHIGAN

IN THE 3RD CIRCUIT COURT FOR THE COUNTY OF WAYNE

CHRISTAL LINT, DANIEL SPIES, and
EDGAR RINKE, Jr.,

Plaintiffs,

CASE NO.: 23 -
HON.

- CH

v

NICHOLAS AVOURIS and ALANNA AVOURIS;
THE CITY OF GROSSE POINTE WOODS;
ARTHUR W. BRYANT, Mayor of the City of Grosse
Pointe Woods; THE CITY OF GROSSE POINTE WOODS
BUILDING DEPARTMENT; and McKENNA AND ASSOCIATES,
a Michigan domestic profit corporation,
Jointly and severally,

Defendants.

LINNELL & ASSOCIATES, PLLC
BY: RICHARD D. LINNELL (P59339)
DAVID H. APPLEBAUM (P78794)
Attorneys for Plaintiffs
2804 Orchard Lake Rd., Ste. 203
Keego Harbor, Michigan 48320
Telephone: (248) 977-4182
Email: jbooth@linnellfirm.com

AFFIDAVIT OF CHRISTAL LINT

State of Michigan)
) ss
County of Oakland)

I, Christal Lint, first being duly sworn, deposes and says that she has personal knowledge of, and if called as a witness can testify competently to, the following facts:

1. I am an owner of record of residentially-zoned real property located in the City of Grosse Pointe Woods, County of Wayne, State of Michigan, and more commonly known as 727 N. Renaud Rd., Grosse Pointe Woods, Michigan (“Lint Property”).

2. The Lint Property immediately abuts and makes contact with 707 N. Renaud Rd., Grosse Pointe Woods, Michigan, which is the genesis of this litigation (“Subject Property”).

3. When I purchased the Lint Property, the dwelling on the Subject Property was a single family ranch home.

4. When NICHOLAS AVOURIS and ALANNA AVOURIS (“Avouris”) purchased the Subject Property, they began unpermitted and unauthorized construction on the Subject Property.

5. Avouris demolished the existing ranch home, and built a new, much larger home in its place.

6. As an adjacent homeowner, I never received any kind of notice of planning commission meetings or site plan approval that would reflect new construction of this magnitude.

7. During the construction process, the grade of the Subject Property was changed such that water runoff pools on the Lint Property and caused flooding in my basement, causing damage to my home and possessions.

8. This happened on numerous occasions, which I alerted Defendant THE CITY OF GROSSE POINTE WOODS (“GPW”) and Defendant THE CITY OF GROSSE POINTE WOODS BUILDING DEPARTMENT (“GPW BD”) agents and representatives to in repeated electronic correspondence, with pictures.

9. I followed the FOIA process with Defendant City Clerk, and requested plans and correspondence from Defendant GPW and Defendant GPW BD related to the Subject Property. In particular, I requested surveys and drainage plans: items that are required for new constructions.

10. I never received those items.

11. I requested the Defendant GPW City Administrator have a meeting with a group of

concerned citizens.

12. The Defendant GPW City Administrator did not appear at the meeting, but instead sent a planning department representative.

13. Shortly after the meeting, the Defendant GPW City Administrator sent correspondence saying the Subject Property fully complied with Defendant GPW's codes and ordinances.

14. Later, in a response to a repeated FOIA request, I received the McKenna Report dated September 26, 2023.

15. The McKenna Report identified many relevant on-site measurements from the Subject Property and identified many zoning violations.

16. As a result of the McKenna Report, I requested multiple updates and new FOIAs from Defendant GPW, and Defendant GPW BD.

17. Information such as police reports that I filed, and inspection reports and surveys mentioned in other FOIA correspondence, as well as communications with Defendant Avouris, were never produced to me.

18. Defendant GPW and GPW BD lack transparency and intentionally withholds documents that substantiate the Subject Property numerous zoning violations.

19. The facts as stated in this Complaint are accurate and true to the best of my knowledge.

VERIFICATION

I declare that the statements above are true to the best of my knowledge, information, and belief.

Dated: November _____, 2023

CHRISTAL LINT

Subscribed and sworn to before me this

_____ day of November, 2023.

_____, Notary Public
County, Michigan
Acting in _____ County
My Commission Expires:

EXHIBIT E

From: [Sam Woodrick](#)
To: [Frank Schulte](#); [Tim Tomlinson](#)
Cc: [Susan Como](#)
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud— NEW ACTIVITY - RESPONSE REQUIRED.
Date: Friday, September 22, 2023 6:32:18 PM

I don't remember exactly, but no I don't think I gave consent.

Just to be clear, I may have admitted that I didn't know if it complied with the lot coverage requirements but it's not my responsibility to know that 100% for certain. It's the plan reviewer's responsibility at the time of review.

We ran another calculation on the submitted plans yesterday for lot coverage and, per the submitted plans, they are well within the lot coverage maximum spelled out in the zoning ordinance.

But, we will be having a building inspector go out and measure the footprint next week just to verify that the HO is complying with the submitted plans.

Get [Outlook for iOS](#)

From: Sam Woodrick <swoodrick@mcka.com>
Sent: Friday, September 22, 2023 6:22:03 PM
To: Frank Schulte <fschulte@gpwmi.us>; Tim Tomlinson <ttomlinson@yorkdolanlaw.com>
Cc: Susan Como <SComo@gpwmi.us>
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud— NEW ACTIVITY - RESPONSE REQUIRED.

Yep. I suspected she did indeed start recording in the middle of the meeting. I hope my exasperation isn't too apparent in the recording, but she started talking about how a BB gun shot her daughter's window and I had trouble understanding the relevance.

Get [Outlook for iOS](#)

From: Frank Schulte <fschulte@gpwmi.us>
Sent: Friday, September 22, 2023 6:16:23 PM
To: Tim Tomlinson <ttomlinson@yorkdolanlaw.com>
Cc: Sam Woodrick <swoodrick@mcka.com>; Susan Como <SComo@gpwmi.us>
Subject: Fwd: CC 23-31 FOIA request - 707 N. Renaud— NEW ACTIVITY - RESPONSE REQUIRED.

FYI

Sent from my iPhone

Begin forwarded message:

From: Christal Lint <lintel@yahoo.com>
Date: September 22, 2023 at 6:06:27 PM EDT
To: Frank Schulte <fschulte@gpwmi.us>
Cc: Bruce Eck <beck@mcka.com>, Mollie Mackinnon <mmackinnon@gpwmi.us>, City Clerk <CityClerk@gpwmi.us>, Susan Como <SComo@gpwmi.us>, swoodrick@mcka.com
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud— NEW ACTIVITY - RESPONSE REQUIRED.

CAUTION: This email originated from outside of the organization. DO NOT click links, open attachments or reply to this message unless you recognize the sender and know the content is safe.

Frank,

We recorded the meeting. You are welcome to listen. But it is not even remotely accurate that Sam provided us with any evidence of compliance. In fact, all he provided was a handful of illegible documents that he said were all you at the city were provided and approved. As an attorney, I can read the code and know that the documents that we were provided did not meet code requirements. I filed multiple FOIA requests and have not been provided with documents responsive to my requests — which confirms what Sam and Paul communication — all you've been provided does not meet requirement for a new construction that completely replaced a prior brick ranch that was about 1/2 the size.

To be clear, the existing structure is of a materially different footprint than the prior structure. The documents are labeled "addition" and was valued at 150k. The new structure, as evidence by google earth, exceed the 35 percent lot coverage requirement and is materially different than the prior structure. Further, Sam admitted that he did not know whether the structure at 707 complied with the 35 percent requirement. I have retained an engineer who confirmed — with the use of google earth — that the structure exceeds by approximate 15 percent the 35 percent requirement.

Moreover, 707 does not have a boundary survey on file. (I however did pay for a boundary survey.) Oddly, Sam did represent that he measured the setbacks — but didn't measure the lot coverage percentage — and said that 707 abides by setback requirement. I am not sure how setback requirement were determined without a boundary survey.

I have mold in my basement; my arborvitae are destroyed; my daughter's bedroom window was shot out by a pellet gun from 707; there is standing water at all corner when it rains; there are rats through the neighborhood; there is a porta John that the public uses regularly on the lot along my property line; the house is raised on a hill like the homes on lakeshore, and the land is completely pitched away from 707 towards the surrounding lot; it is obvious that there is non compliance with code grading requirements. This is just the tip of the iceberg in terms of what we wanted to discuss with you as the person responsible for the City. I and my neighbors have called the city at every juncture about these issue and strangely there in nothing in the city's files related to these complaints or how the were considered and decided upon by the city— I requested those materials via FOIA.

Finally, the aesthetics of the structure do not comply with the character or quality of materials requirement in the code. The structure is a literal joke across the Woods and the entire Grosse Pointe communities. This is a fact.

The Renaud residents look forward to speaking with you and the city attorney. Have nice weekend.

Christal

Sent from my iPhone

On Sep 22, 2023, at 4:39 PM, Frank Schulte <fschulte@gpwmi.us> wrote:

Dear Mrs. Lint

Unfortunately, I had a prior commitment and could not make the meeting. Sam Woodrick from McKenna the city planner provided you and the other residents information that 707 North Renaud reconstruction meets all city codes and ordinances.

City attorney Tim Tomlinson will provide you a follow-up correspondence regarding your additional concerns.

Thanks,

Frank Schulte
City Administrator
City of Grosse Pointe Woods
20025 Mack Plaza Drive

Grosse Pointe Woods, MI 48236
Direct: #313.343.2450
Fax: #313.343.2658

"It's not what you look at that matters, it's what you see." ~Henry David Thoreau

From: Christal Lint <lintcl@yahoo.com>
Sent: Friday, September 22, 2023 1:00 PM
To: Paul Antolin <pantolin@gpwmi.us>
Cc: Bruce Eck <beck@mcka.com>; Mollie Mackinnon <mmackinnon@gpwmi.us>; City Clerk <CityClerk@gpwmi.us>; Frank Schulte <fschulte@gpwmi.us>; Susan Como <SComo@gpwmi.us>
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud— NEW ACTIVITY - RESPONSE REQUIRED.

CAUTION: This email originated from outside of the organization. DO NOT click links, open attachments or reply to this message unless you recognize the sender and know the content is safe.

As a follow up to our meeting yesterday with Sam, I am writing to express our collective disappointment that with the fact that Sam was the only attendee from the city. We expressly requested the City Manager attend. We had 5 owners yesterday, and several more have issues but couldn't get off work. We all took time off work to meet and we were basically told the same thing I was told on the phone with Sam. And again, we were essentially told that the city could do nothing, despite the fact that the FOIA response I received indicated that the only "plans" submitted and approved by the city are illegible and are labeled "addition"; additionally documents related to filed complaints about the property and the work being done are undoubtedly incomplete based on calls from the 5 owners who attended yesterday's meeting.

I am requesting again a meeting with the manager and owners after normal business hours in the next 2 weeks or we will attend the next city council meeting and raise our concerns there.

Thank you.

Sent from my iPhone

On Sep 13, 2023, at 4:47 PM, Christal Lint <lintcl@yahoo.com> wrote:

Got it. So as I understand it, from your perspective I've been given everything the city has for 707 that was covered by my FOIA request.

Thank you for your assistance.

Sent from my iPhone

On Sep 13, 2023, at 4:12 PM, Paul Antolin <pantolin@gpwmi.us> wrote:

Good afternoon Christal,

According to the Building Dept. you were given all documents available

in response to your FOIA request. I was informed that a representative from the Building Dept. will be contacting you shortly.

At this time, I have no further information for you, other than the Building representative that contacts you should be able to answer any questions you may have.

Thank you and have a nice day.

**Paul P. Antolin, MiPMC
City Clerk**

City of Grosse Pointe Woods – Clerk’s Office
20025 Mack Plaza Dr.
Grosse Pointe Woods, MI 48236-2397
Phone: 313-343-2440
Fax: 313-343-5667

From: Christal Lint <lintcl@yahoo.com>
Sent: Wednesday, September 13, 2023 12:14 PM
To: Paul Antolin <pantolin@gpwwmi.us>
Cc: Bruce Eck <beck@mcka.com>; Mollie Mackinnon <mmackinnon@gpwwmi.us>; City Clerk <CityClerk@gpwwmi.us>; Frank Schulte <fschulte@gpwwmi.us>; Susan Como <SComo@gpwwmi.us>
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud— NEW ACTIVITY - RESPONSE REQUIRED.

CAUTION: This email originated from outside of the organization. DO NOT click links, open attachments or reply to this message unless you recognize the sender and know the content is safe.

Hi,

There are landscapers dropping off a bunch of stuff right now at 707 (including many Arborvitae) which, after over a week of no outside work, suggests to me that they’re planning to plant them without addressing grading and other requirements pursuant to an approved plan.

Paul, do you have all the documents responsive to my FOIA request?

Sent from my iPhone

On Sep 13, 2023, at 10:53 AM, Christal Lint <lintcl@yahoo.com> wrote:

Following up on this as we’ve not heard anything in over a week.

Sent from my iPhone

On Sep 5, 2023, at 4:32 PM, Christal Lint
<lintcl@yahoo.com> wrote:

Hi Paul,

I just wanted to reiterate that the issues are not limited to those that I outlined in my correspondence related to my property, such as the mold in my basement from water runoff from 707. As I mentioned, several other homeowners on N. Renaud have issues with 707 and would like to speak to the City Manager (I've been told by the engineer I retained that he/she is the appropriate city official to meet with), and many of these issues will not be able to be resolved in the absence of the materials requested by my FOIA requests being provided prior to a meeting. In other words, without those materials— particularly the plans that were submitted and approved— it's unclear how anyone would be able to have a meaningful discussion.

Nevertheless, I understand that you are simply conveying a message. And I'm simply clarifying the record to the extent that it was unclear.

Thank you.

Sent from my iPhone

On Sep 5, 2023, at 4:07 PM,
Paul Antolin
<pantolin@gpwwmi.us> wrote:

Good afternoon Christal,

I just spoke with the City Administrator, Frank Schulte. He will be meeting with Building Official Bruce Eck and McKenna (Building Services) tomorrow to discuss your issue with 707 N. Renaud.

After their meeting, they will reach out to you to further discuss the matter and answer any further questions you may have.

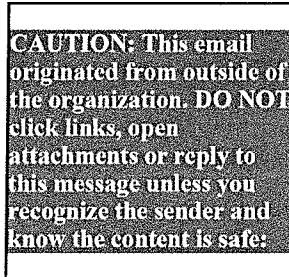
Feel free to contact me if you have any questions.

Thank you,

**Paul P. Antolin, MiPMC
City Clerk**

City of Grosse Pointe Woods –
Clerk's Office
20025 Mack Plaza Dr.
Grosse Pointe Woods, MI
48236-2397
Phone: 313-343-2440
Fax: 313-343-5667

From: Christal Lint
<lintcl@yahoo.com>
Sent: Tuesday, September 5,
2023 8:56 AM
To: Paul Antolin
<pantolin@gpwmi.us>
Cc: Bruce Eck
<beck@mcka.com>; Mollie
Mackinnon
<mmackinnon@gpwmi.us>;
City Clerk
<CityClerk@gpwmi.us>; Frank
Schulte <fschulte@gpwmi.us>;
Susan Como
<SComo@gpwmi.us>
Subject: Re: CC 23-31 FOIA
request - 707 N. Renaud



Thank you. I was planning to head up to request the meeting on behalf of my husband and I and the three owners who I've spoken to this far who would like to meet as well. In light of your email, I'll hold off with the expectation that the response I receive will address this request.

Thanks again.

Sent from my iPhone

On Sep 5, 2023,
at 8:49 AM, Paul
Antolin
<pantolin@gpwmi.us>
wrote:

Good morning
Christal,

I apologized for
the late response
as I was out of
town for family
medical reasons.

I am including the
City
Administrator
and Assistant City
Administrator on
this email so they
are aware of your
request. You
should be
receiving a
response shortly.

If you have any
further
questions, feel
free to contact
me.

Thank you,

**Paul P. Antolin,
MiPMC
City Clerk**

City of Grosse
Pointe Woods –
Clerk's Office
20025 Mack
Plaza Dr.
Grosse Pointe
Woods, MI
48236-2397
Phone: 313-343-
2440
Fax: 313-343-
5667

From: Christal Lint
<lintcl@yahoo.com>
Sent: Friday, September 1, 2023 8:25 AM
To: Paul Antolin
<pantolin@gpwmi.us>
Cc: Bruce Eck
<beck@mcka.com>; Mollie Mackinnon
<mackinnon@gpwmi.us>; City Clerk
<CityClerk@gpwmi.us>
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud

CAUTION:
This email originated from outside of the organization. **DO NOT** click links, open attachments or reply to this message unless you recognize the sender and know the content is safe.

Good morning
Paul,

I am sending this email for the benefit of your files on the issues we've been discussing.

I did not receive a response to my email below, therefore today I will be requesting a meeting with the City Manager. I also note for the record, that the meeting request

From: Sam Woodrick
To: John Jackson
Subject: Fwd: CC 23-31 FOIA request - 707 N. Renaud
Date: Friday, September 22, 2023 5:37:43 PM
Attachments: image003.jpg

Get [Outlook for iOS](#)

From: Frank Schulte <fschulte@gpwmi.us>
Sent: Friday, September 22, 2023 5:36:26 PM
To: Tim Tomlinson <ttomlinson@yorkdolanlaw.com>
Cc: Sam Woodrick <swoodrick@mcka.com>; Susan Como <SComo@gpwmi.us>
Subject: RE: CC 23-31 FOIA request - 707 N. Renaud

Hi Tim,

Please review prior emails from Chirstal Link she lives next door to 707 North Renaud which is being reconstructed. She is upset about the size of the new home and grading. During a rain event she had storm water runoff come from 707 North Renaud to her property at 727 North Renaud. Sam Woodrick from McKenna will provide you an email regarding the meeting that took place with her and other residents from the block.

Additional items.

- Her FOIA request that was submitted, all available information was answered and provided. She wanted grading and topo information which was not a requirement for this project.
- The home being built at 707 North Renaud meets all city code and ordinance requirements. The FOIA request submitted all available information was answered and provided.
- After the meeting it was decided the owner of 707 North Renaud will provide grading plan and it will be reviewed by our city engineer for approval.

Tim for your information I found out Christal Lint home at 727 North Renaud is not Homestead and registered to address in Chicago. The winter 2020 taxes have not been paid in the amount of \$8,031.65. No park pass has been taken out. If Chirstal Link does not have a State of Michigan license is she consider a resident?

Once you review Sam Woodrick email, please provide Christal Lint a letter that the home at 707 North Renaud meets all city code and ordinance requirements. The FOIA request was answered and grading plan will be reviewed by our city engineer for approval.

727 N RENAUD RD GROSSE POINTE WOODS, MI 48236 (Property Address)

Parcel Number: 010.08.0113.000 Account Number: 2064700



Item 1 of 3

Image/2.Sketches

Property Owner: SPIES, DANIEL-LINT, CHRISTAL

Summary Information

> Residential Building Summary

- Year Built: 1952 - Bedrooms: 0
 - Half Baths: 1

- Full Baths: 2
 - Sq. Feet: 3,131 - Acres: 0.300

> Utility Billing information found

> Assessed Value: \$329,800 | Taxable Value: \$241,574

> Property Tax information found

> 8 Building Department records found

Principal Residence Exemption

2023

0.0000 %

June 1st

Final

0.0000 %

Owner and Taxpayer Information

Owner SPIES, DANIEL-LINT, CHRISTAL
 3922 N. MARSHFIELD
 CHICAGO, IL 60613

Taxpayer

SEE OWNER INFORMATION

[Back To Top](#)

Other Information

User Number Index

0

[Back To Top](#)

Tax History

Year	Season	Total Amount	Total Paid	Last Paid	Total Due
2023	Summer	\$8,294.01	\$8,294.01	08/14/2023	\$0.00
2022	Winter	\$8,313.52	\$8,313.52	01/13/2023	\$0.00
2022	Summer	\$7,847.94	\$7,847.94	08/30/2022	\$0.00
2021	Winter	\$8,059.76	\$8,059.76	12/09/2021	\$0.00
2021	Summer	\$7,713.69	\$7,713.69	08/31/2021	\$0.00
2020	Winter	\$8,031.65	\$0.00		\$8,031.65
2020	Summer	\$7,996.88	\$8,034.78	10/15/2020	(\$37.90)
2019	Winter	\$7,654.46	\$7,654.46	02/14/2020	\$0.00
2019	Summer	\$7,549.84	\$7,549.84	09/03/2019	\$0.00

Thanks,

Frank Schulte
City Administrator
City of Grosse Pointe Woods
20025 Mack Plaza Drive
Grosse Pointe Woods, MI 48236
Direct: #313.343.2450
Fax: #313.343.2658

"It's not what you look at that matters, it's what you see." ~Henry David Thoreau

From: Christal Lint <lintcl@yahoo.com>
Sent: Tuesday, September 5, 2023 8:56 AM
To: Paul Antolin <pantolin@gpwmi.us>
Cc: Bruce Eck <beck@mcka.com>; Mollie Mackinnon <mmackinnon@gpwmi.us>; City Clerk <CityClerk@gpwmi.us>; Frank Schulte <fschulte@gpwmi.us>; Susan Como <SComo@gpwmi.us>
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud

CAUTION: This email originated from outside of the organization. DO NOT click links, open attachments or reply to this message unless you recognize the sender and know the content is safe.

Thank you. I was planning to head up to request the meeting on behalf of my husband and I and the three owners who I've spoken to this far who would like to meet as well. In light of your email, I'll hold off with the expectation that the response I receive will address this request.

Thanks again.

Sent from my iPhone

On Sep 5, 2023, at 8:49 AM, Paul Antolin <pantolin@gpwmi.us> wrote:

Good morning Christal,

I apologized for the late response as I was out of town for family medical reasons.

I am including the City Administrator and Assistant City Administrator on this email so they are aware of your request. You should be receiving a response shortly.

If you have any further questions, feel free to contact me.

Thank you,

Paul P. Antolin, MIPMC
City Clerk

City of Grosse Pointe Woods -- Clerk's Office
20025 Mack Plaza Dr.
Grosse Pointe Woods, MI 48236-2397
Phone: 313-343-2440
Fax: 313-343-5667

From: Christal Lint <lintcl@yahoo.com>
Sent: Friday, September 1, 2023 8:25 AM
To: Paul Antolin <pantolin@gpwmi.us>
Cc: Bruce Eck <beck@mcka.com>; Mollie Mackinnon <mmackinnon@gpwmi.us>; City Clerk <CityClerk@gpwmi.us>
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud

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Good morning Paul,

I am sending this email for the benefit of your files on the issues we've been discussing.

I did not receive a response to my email below, therefore today I will be requesting a meeting with the City Manager. I also note for the record, that the meeting request will include several neighbors /homeowners on N Renaud as well. After speaking to a few neighbors yesterday, I learned that many home owners on N Renaud have concerns similar to mine and several have called the building department — and in some instances the PD — about those issues. As of now, there are three other homeowners in addition to myself who want to meet with the City Manager, and based on my conversation with those owners, I expect the number of participants from N Renaud to expand.

I noticed that you copied someone with a city manager email address in your email yesterday, and that address is included in this email. If the City Manager or someone from their office is in fact on this email, it would be much appreciated if a response with available times to meet with myself and the other homeowners on N Renaud could be provided via email, rather than having me come in person to the office this morning to request the same.

Thank you.
Christal

Sent from my iPhone

On Aug 31, 2023, at 11:02 AM, Christal Lint <lintcl@yahoo.com> wrote:

I do not have a copy of my request as I provided them to you, but the following is what I asked for, even if not word for word: (1) all plans for 707 N Renaud, including (but not limited to) all to plans relating to grading, soil erosion, sewage and water run off; (2) the boundary survey; (3) the topographic survey ; (4) all approvals of those plans; (5) any enforcement activity for code violations and (6) all communications between the city and developer relating to code violation issues.

As you'll recall, the only things I was provided were (1) the topographic survey and (2) documents related to a violation for tearing down the garage without a permit, which I understand to have included the wall that was supposed to be left up to make the construction a rehab rather than new construction; there are obviously significant implications for this violation including what was required to be submitted and approved and property tax implications. This is why I asked for correspondence regarding violations. The second violation related to not having fencing up. The document indicates there was no violation, and the building rep said in an email there is no requirement for fencing. (I find that hard to believe because that allows and did allow until i insisted something be put up, a giant hole in the ground and construction materials and machinery that is accessible by the kids in the neighborhood and any passerby's , not to mention that we all had to look at it daily.)

If it's not obvious at this point, the issues with 707 go far beyond the water issue, although that is the most pressing

in terms of damage to my property and what is likely to be damage to other bordering properties. It is an issue now and without an approved plan that complies with code for grading and water run off, it will be an issue long term. Currently the building has dug drainage ditches along my property and the property to the east — I would say at least a foot below the grade of my lot— and coupled with the altered grading of the lot as a whole — meaning the house is on a hill in the center and pitched away towards my property — now the water stands and has flowed into my basement at the corner and I now have mold growing in my basement. Aside from the mold inside being a health issue, the standing water is a health issue, particularly given the increase in bugs and rodents. Notable it also runs along the porta-potty on the lot, which has been dumped probably once and it was recently. I've been outside when random passerby's have stopped and used the John bc there isn't adequate security. That's a safety issue for me and the neighborhood. If I haven't told you I have 2 children— 11 and 13. In fact, before the fencing was put up my daughter's window, which is only accessible from 707, was shot with a BB gun. The developer tried to blame the children who live to the east; there is a police report for this incident. I also had to call over the weekend because the construction machinery that was left on the lot without a protective barrier was left on for days.

As evidences by the above, this not a project done by a professional firm with identification on the plot. In addition to there foregoing, there have been intermittent workers— some that have come at 10 in the evening and parked in front of my house — and the bulk off work has been done during holidays which I do not believe to be coincidence. (For example, after sitting on the house for more than a year, tear down began Easter weekend of 2022.) There are people who have come into my yard without permission— moving by trampoline, cutting down trees on my yard and hooking up to the electrical pole in my yard — I have dogs in addition to my kids. Not until I called the city more than once was it moved to the 707 lot; there was nothing in the materials related to that. Is this because there are no rules about trespassing and connecting dangerous electrical set ups without permission on neighboring properties.

The house was purchased in the spring of 2021, sat for a year, and tear down began in the spring of 2022. It has been over a year of dealing with the nuisance and safety and health issues and the house is nowhere near being done. There is nothing that the builder has done or that the city has overseen that gives me any confidence that the builder has complied with applicable laws and that I will not have water issues or other issues long term as a result of non-compliance. Therefore, I need the information I requested, as noted above, and there's been sufficient time to provide it. If there's no plan on file— please state that clearly. Then I can pursue through appropriate channels how the project got to the current state without a plan. Similarly, if there is not a boundary survey on file, please clearly state that.

Paul, I copied you on my responses to the building dept and made clear that those responses did not adequately respond to my FOIA request nor was it appropriate to expect me to rely on a verbal representation from the builder to the city as to ensuring appropriate grading and drainage. And saying that we will wait until the project is completed is unacceptable as it too late — the final plans need to comply with the approved which is why I asked for and need the approved plans.

I will stop by the office to request an in person meeting with the city manager about this, unless someone responds and lets me know that the materials I requested will be provided today.

Thank you and have a nice weekend.

Sent from my iPhone

On Aug 31, 2023, at 10:04 AM, Paul Antolin <pantolin@gpwmi.us> wrote:

Good morning Christal,

I was under the impression that we provided all the information that was available. Please clarify exactly what it is you're missing. From the correspondence with the building dept. some of the information requested wasn't available until the project was complete. Unless i misunderstood something.

Currently, I'm out of the office but should you come to City Hall, the building dept. should be able to help clarify your questions.

Thank you.
Paul

Sent from my iPhone

On Aug 31, 2023, at 8:11 AM, Christal Lint <lintcl@yahoo.com> wrote:

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Good morning Paul,

It's now been several weeks since filing my requests and I've not yet received a full set of responsive materials. I plan to come up to the office this afternoon to retrieve those documents so that I can meet with my engineer before the holiday weekend.

Thank you.
Christal

Sent from my iPhone

On Aug 21, 2023, at 1:37 PM, Christal Lint <lintcl@yahoo.com> wrote:

Thank you. I will follow up Thursday if I don't hear back before then as that will be two weeks from my original requests. Have a great week.

Sent from my iPhone

On Aug 21, 2023, at 12:55 PM, Paul Antolin
<pantolin@gpwwmi.us> wrote:

Good afternoon Christal,

I've forwarded your email to the Building Official, Bruce Eck.

I did not respond to your questions as I am unsure of the definite answers and more importantly, did not want to misinform you.

If there are any further questions, feel free to contact me.

Thank you,

Paul P. Antolin, MiPMC
City Clerk

City of Grosse Pointe Woods – Clerk's Office
20025 Mack Plaza Dr.
Grosse Pointe Woods, MI 48236-2397
Phone: 313-343-2440
Fax: 313-343-5667

From: Christal Lint <lintcl@yahoo.com>
Sent: Wednesday, August 16, 2023 8:04 AM
To: Paul Antolin <pantolin@gpwwmi.us>
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud

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reply to this message unless you recognize the sender
and know the content is safe:

Hi Paul,

Thanks again for the documents. I've had a chance to review the attached and I've sent the plan drawing on to my engineers to review and come by check out the structure to see if there are any obvious conflicts between approved plan and what's been built. I do have a few questions/comments on the remaining items.

The items emailed do not seem to fully respond to my request. For example, I asked for the soil erosion plan and other plan items related to water flow (different than, but in addition to the topographic survey) but I do not see it in the materials provided. Could you please provide all plans, including soil erosion and plans dealing with water flow, drainage, sewage, grading of land— all of which were in my original request of Aug. 10, 2023. If the city does not have these items, could you please confirm via email that no such plans were submitted and approved by the developer?

Additionally, I see that there was an inspection for inadequate fencing but there was no violation found. I don't understand how that's possible— I called in about the lack of any fencing and following my call he put up a fence. I'd like to request via FOIA, copies all communications between the property owner and the city regarding the fence and the other enforcement item— demolishing the garage without a permit. Please let me know if this email request is sufficient or if I should stop by the office to fill out a FOIA form. I understand that these requested communications are under a different request and therefore have a different time frame for response.

Regards,
Christal

Sent from my iPhone

On Aug 14, 2023, at 10:59 AM, Christal Lint
<lintcl@yahoo.com> wrote:

Thank you very much, Paul.

Sent from my iPhone

On Aug 14, 2023, at 10:57 AM, Paul
Antolin <pantclin@gpwm.us>
wrote:

Good morning,

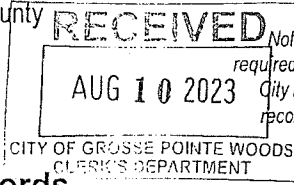
Please see the attached response

EXHIBIT F

CC 23-31

City: Keep original and provide copy of both sides, along with Public Summary, to requestor at no charge.

City of Grosse Pointe Woods, Wayne County
20025 Mack Plaza
Grosse Pointe Woods, MI 48236
Phone: 313 343-2440



Request Form
Note: Requestors are not required to use this form. The City may complete one for recordkeeping if not used.

FOIA Request for Public Records

Michigan Freedom of Information Act, Public Act 442 of 1976, MCL 15.231, et seq.

Request No.: ^{CC} 23-31 Date Received: 8/10/23 Check if received via: Email Fax Other Electronic Method
Date delivered to junk/spam folder: _____
Date discovered in junk/spam folder: _____
(Please Print or Type)

Name	Christal Lind	Phone	917 566 3870
Firm/Organization		Fax	
Street	727 N. Renaud	Email	lindcl@wpw.com
City	GPW	State	MI
		Zip	48236

Request for: Copy Certified copy Record inspection Subscription to record issued on regular basis
Delivery Method: Will pick up Will make own copies onsite Mail to address above Email to address above

Deliver on digital media provided by the City: _____

Note: The City is not required to provide records in a digital format or on digital media if the City does not already have the technological capability to do so.

Describe the public record(s) as specifically as possible. You may use this form or attach additional sheets:

Any Plans for construction at 707 N Renaud, including the grading plan for the property, any plans for water collection and drainage and sewage. Also, records of any permits related to such plans and any records of approval, enforcement in regards to construction on or at 707 N. Renaud

Consent to Non-Statutory Extension of City's Response Time

I have requested a copy of records or a subscription to records or the opportunity to inspect records, pursuant to the Michigan Freedom of Information Act, Public Act 442 of 1976, MCL 15.231, et seq. I understand that the City must respond to this request within five (5) business days after receiving it, and that response may include taking a 10-business day extension. However, I hereby agree and stipulate to extend the City's response time for this request until:

Christal Lind (month, day, year) 8.10.23

Requestor's Signature	Date
-----------------------	------

(Complete both sides)

Records Located on Website

If the City directly or indirectly administers or maintains an official internet presence, any public records available to the general public on that internet site at the time the request is made are exempt from any labor charges to redact (*separate exempt information from non-exempt information*).

If the FOIA coordinator knows or has reason to know that all or a portion of the requested information is available on its website, the City must notify the requestor in its written response that all or a portion of the requested information is available on its website. The written response, to the degree practicable in the specific instance, must include a specific webpage address where the requested information is available. On the detailed cost itemization form, the City must separate the requested public records that are available on its website from those that are not available on the website and must inform the requestor of the additional charge to receive copies of the public records that are available on its website.

If the City has included the website address for a record in its written response to the requestor and the requestor thereafter stipulates that the public record be provided to him or her in a paper format or other form, including digital media, the City must provide the public records in the specified format (if the City has the technological capability) but may use a fringe benefit multiplier greater than the 50%, not to exceed the actual costs of providing the information in the specified format.

Request for Copies/Duplication of Records on City Website

I hereby stipulate that, even if some or all of the records are located on a City website, I am requesting that the City make copies of those records on the website and deliver them to me in the format I have requested above. I understand that some FOIA fees may apply.

Requestor's Signature

Date

8.10.23

Overtime Labor Costs

Overtime wages shall not be included in the calculation of labor costs unless overtime is specifically stipulated by the requestor and clearly noted on the detailed cost itemization form.

Consent to Overtime Labor Costs

I hereby agree and stipulate to the City using overtime wages in calculating the following labor costs as itemized in the following categories:

- 1. Labor to copy/duplicate
- 2. Labor to locate
- 3a. Labor to redact
- 3b. Contract labor to redact
- 6b. Labor to copy/duplicate records already on City's website

Requestor's Signature

Date

8.10.23

Request for Discount: Indigence

A public record search must be made and a copy of a public record must be furnished without charge for the first \$20.00 of the fee for each request by an individual who is entitled to information under this act and who:

- 1) Submits an affidavit stating that the individual is indigent and receiving specific public assistance, OR
- 2) If not receiving public assistance, stating facts showing inability to pay the cost because of indigence.

If a requestor is ineligible for the discount, the public body shall inform the requestor specifically of the reason for ineligibility in the public body's written response. An individual is ineligible for this fee reduction if ANY of the following apply:

- (i) The individual has previously received discounted copies of public records from the same public body twice during that calendar year,
- (ii) The individual requests the information in conjunction with outside parties who are offering or providing payment or other remuneration to the individual to make the request. A public body may require a statement by the requestor in the affidavit that the request is not being made in conjunction with outside parties in exchange for payment or other remuneration.

Office Use: Affidavit Received Eligible for Discount Ineligible for Discount

I am submitting an affidavit and requesting that I receive the discount for indigence for this FOIA request:

Date:

Requestor's Signature:

Request for Discount: Nonprofit Organization

A public record search must be made and a copy of a public record must be furnished without charge for the first \$20.00 of the fee for each request by a nonprofit organization formally designated by the state to carry out activities under subtitle C of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 and the Protection and Advocacy for Individuals with Mental Illness Act, if the request meets ALL of the following requirements:

- (i) Is made directly on behalf of the organization or its clients.
- (ii) Is made for a reason wholly consistent with the mission and provisions of those laws under section 931 of the Mental Health Code, 1974 PA 258, MCL 330.1931.
- (iii) Is accompanied by documentation of its designation by the state, if requested by the City.

Office Use: Documentation of State Designation Received Eligible for Discount Ineligible for Discount

I stipulate that I am a designated agent for the nonprofit organization making this FOIA request and that this request is made directly on behalf of the organization or its clients and is made for a reason wholly consistent with the mission and provisions of those laws under section 931 of the Mental Health Code, 1974 PA 258, MCL 330.1931:

Date:

Requestor's Signature:

From: [Christal Lint](#)
To: [Paul Antolin](#)
Cc: [Bruce Eck](#); [Mollie Mackinnon](#)
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud
Date: Thursday, August 31, 2023 9:11:52 AM

Good morning Paul,

It's now been several weeks since filing my requests and I've not yet received a full set of responsive materials. I plan to come up to the office this afternoon to retrieve those documents so that I can meet with my engineer before the holiday weekend.

Thank you.
Christal

Sent from my iPhone

On Aug 21, 2023, at 1:37 PM, Christal Lint <lintcl@yahoo.com> wrote:

Thank you. I will follow up Thursday if I don't hear back before then as that will be two weeks from my original requests. Have a great week.

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Good afternoon Christal,

I've forwarded your email to the Building Official, Bruce Eck.

I did not respond to your questions as I am unsure of the definite answers and more importantly, did not want to misinform you.

If there are any further questions, feel free to contact me.

Thank you,

Paul P. Antolin, MiPMC
City Clerk

City of Grosse Pointe Woods – Clerk's Office
20025 Mack Plaza Dr.
Grosse Pointe Woods, MI 48236-2397
Phone: 313-343-2440
Fax: 313-343-5667

From: Christal Lint <lintcl@yahoo.com>
Sent: Wednesday, August 16, 2023 8:04 AM
To: Paul Antolin <pantolin@gpwmi.us>
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud

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Hi Paul,

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The items emailed do not seem to fully respond to my request. For example, I asked for the soil erosion plan and other plan items related to water flow (different than, but in addition to the topographic survey) but I do not see it in the materials provided. Could you please provide all plans, including soil erosion and plans dealing with water flow, drainage, sewage, grading of land— all of which were in my original request of Aug. 10, 2023. If the city does not have these items, could you please confirm via email that no such plans were submitted and approved by the developer?

Additionally, I see that there was an inspection for inadequate fencing but there was no violation found. I don't understand how that's possible— I called in about the lack of any fencing and following my call he put up a fence. I'd like to request via FOIA, copies all communications between the property owner and the city regarding the fence and the other enforcement item— demolishing the garage without a permit. Please let me know if this email request is sufficient or if I should stop by the office to fill out a FOIA form. I understand that these requested communications are under a different request and therefore have a different time frame for response.

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Thank you very much, Paul.

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Good morning,

Please see the attached response regarding
your CC 23-32 FOIA request.

Per our discussion this morning, I will follow-up
on your additional request for the Boundary,
topographic surveys & Soil plan for 707 N.
Renaud.

If you have any further questions, feel free to
contact me.

Thank you,

**Paul P. Antolin, MiPMC
City Clerk**

City of Grosse Pointe Woods – Clerk's Office
20025 Mack Plaza Dr.
Grosse Pointe Woods, MI 48236-2397
Phone: 313-343-2440
Fax: 313-343-5667

Property of the City of Grosse Pointe Woods. If
you have received this transmission in error,
please delete immediately.

<E221138_Redacted.pdf>

<707 n renaud building pemrit_Redacted.pdf>

<707 n renaud demo permit_Redacted.pdf>

<707 s renaud site plan.pdf>

<E221122_Redacted.pdf>

Property of the City of Grosse Pointe Woods. If you have received this transmission in error, please delete immediately.

From: [Christal Lint](#)
To: [Paul Antolin](#)
Cc: [Bruce Eck](#); [Mollie Mackinnon](#); [City Clerk](#)
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud
Date: Thursday, August 31, 2023 11:03:06 AM

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As you'll recall, the only things I was provided were (1) the topographic survey and (2) documents related to a violation for tearing down the garage without a permit, which I understand to have included the wall that was supposed to be left up to make the construction a rehab rather than new construction; there are obviously significant implications for this violation including what was required to be submitted and approved and property tax implications. This is why I asked for correspondence regarding violations. The second violation related to not having fencing up. The document indicates there was no violation, and the building rep said in an email there is no requirement for fencing. (I find that hard to believe because that allows and did allow until i insisted something be put up, a giant hole in the ground and construction materials and machinery that is accessible by the kids in the neighborhood and any passerby's , not to mention that we all had to look at it daily.)

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Paul, I copied you on my responses to the building dept and made clear that those responses did not adequately respond to my FOIA request nor was it appropriate to expect me to rely on a verbal representation from the builder to the city as to ensuring appropriate grading and drainage. And saying that we will wait until the project is completed is unacceptable as it too late — the final plans need to comply with the approved which is why I asked for and need the approved plans.

I will stop by the office to request an in person meeting with the city manager about this, unless someone responds and lets me know that the materials I requested will be provided today.

Thank you and have a nice weekend.

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<pantolin@gpwwi.us> wrote:

Good afternoon Christal,

I've forwarded your email to the Building
Official, Bruce Eck.

I did not respond to your questions as I am
unsure of the definite answers and more
importantly, did not want to misinform you.

If there are any further questions, feel free to
contact me.

Thank you,

Paul P. Antolin, MiPMC
City Clerk

City of Grosse Pointe Woods – Clerk’s Office
20025 Mack Plaza Dr.
Grosse Pointe Woods, MI 48236-2397
Phone: 313-343-2440
Fax: 313-343-5667

From: Christal Lint <lintcl@yahoo.com>
Sent: Wednesday, August 16, 2023 8:04 AM
To: Paul Antolin <pantolin@gpwmi.us>
Subject: Re: CC 23-31 FOIA request - 707 N.
Renaud

CAUTION: This email originated from outside of the organization. DO NOT click links, open attachments or reply to this message unless you recognize the sender and know the content is safe:

Hi Paul,

Thanks again for the documents. I’ve had a chance to review the attached and I’ve sent the plan drawing on to my engineers to review and come by check out the structure to see if there are any obvious conflicts between approved plan and what’s been built. I do have a few questions/comments on the remaining items.

The items emailed do not seem to fully respond to my request. For example, I asked for the soil erosion plan and other plan items related to water flow (different than, but in addition to the topographic survey) but I do not see it in the materials provided. Could you please provide all plans, including soil erosion and plans dealing with water flow, drainage, sewage, grading of land— all of which were in my original request of Aug. 10, 2023. If the city does not have these items, could you please confirm via email that no such plans were submitted and approved by the developer?

Additionally, I see that there was an inspection for inadequate fencing but there was no violation found. I don't understand how that's possible— I called in about the lack of any fencing and following my call he put up a fence. I'd like to request via FOIA, copies all communications between the property owner and the city regarding the fence and the other enforcement item— demolishing the garage without a permit. Please let me know if this email request is sufficient or if I should stop by the office to fill out a FOIA form. I understand that these requested communications are under a different request and therefore have a different time frame for response.

Regards,
Christal

Sent from my iPhone

On Aug 14, 2023, at 10:59 AM,
Christal Lint <lintcl@yahoo.com>
wrote:

Thank you very much, Paul.

Sent from my iPhone

On Aug 14, 2023, at
10:57 AM, Paul
Antolin
<pantolin@gpwwmi.us>
wrote:

Good morning,

Please see the

attached response
regarding your CC
23-32 FOIA request.

Per our discussion
this morning, I will
follow-up on your
additional request
for the Boundary,
topographic surveys
& Soil plan for 707 N.
Renaud.

If you have any
further questions,
feel free to contact
me.

Thank you,

**Paul P. Antolin,
MiPMC
City Clerk**

City of Grosse
Pointe Woods –
Clerk's Office
20025 Mack Plaza
Dr.
Grosse Pointe
Woods, MI 48236-
2397
Phone: 313-343-
2440
Fax: 313-343-
5667

Property of the City
of Grosse Pointe
Woods. If you have
received this
transmission in
error, please delete
immediately.
<E221138_Redacted.pdf>
<707 n renaud
building
pemrit_Redacted.pdf>

<707 n renaud demo
permit_Redacted.pdf>
<707 s renaud site
plan.pdf>
<E221122_Redacted.pdf>

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transmission in error, please delete
immediately.

Property of the City of Grosse Pointe Woods. If you have received this
transmission in error, please delete immediately.

From: [Mollie Mackinnon](#)
To: [Sam Woodrick](#)
Subject: FW: CC 23-31 FOIA request - 707 N. Renaud
Date: Tuesday, September 5, 2023 4:30:32 PM

From: Christal Lint <lintcl@yahoo.com>
Sent: Thursday, August 31, 2023 11:03 AM
To: Paul Antolin <pantolin@gpwmi.us>
Cc: Bruce Eck <beck@mcka.com>; Mollie Mackinnon <mmackinnon@gpwmi.us>; City Clerk <CityClerk@gpwmi.us>
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud

CAUTION: This email originated from outside of the organization. DO NOT click links, open attachments or reply to this message unless you recognize the sender and know the content is safe:

I do not have a copy of my request as I provided them to you, but the following is what I asked for, even if not word for word: (1) all plans for 707 N Renaud, including (but not limited to) all to plans relating to grading, soil erosion, sewage and water run off; (2) the boundary survey; (3) the topographic survey ; (4) all approvals of those plans; (5) any enforcement activity for code violations and (6) all communications between the city and developer relating to code violation issues.

As you'll recall, the only things I was provided were (1) the topographic survey and (2) documents related to a violation for tearing down the garage without a permit, which I understand to have included the wall that was supposed to be left up to make the construction a rehab rather than new construction; there are obviously significant implications for this violation including what was required to be submitted and approved and property tax implications. This is why I asked for correspondence regarding violations. The second violation related to not having fencing up. The document indicates there was no violation, and the building rep said in an email there is no requirement for fencing. (I find that hard to believe because that allows and did allow until i insisted something be put up, a giant hole in the ground and construction materials and machinery that is accessible by the kids in the neighborhood and any passerby's , not to mention that we all had to look at it daily.)

If it's not obvious at this point, the issues with 707 go far beyond the water issue, although that is the most pressing in terms of damage to my property and what is likely to be damage to other bordering properties. It is an issue now and without an approved plan that complies with code for grading and water run off, it will be an issue long term. Currently the building has dug drainage ditches along my property and the property to the east — I would say at least a foot below the grade of my lot— and coupled with the altered grading of the lot as a whole — meaning the house is on a hill in the center and pitched away towards my property — now the water stands and has flowed into my basement at the corner and I now have mold growing in my basement. Aside from the mold inside being a health issue, the standing water is a health issue, particularly given the increase in

bugs and rodents. Notable it also runs along the porta-potty on the lot, which has been dumped probably once and it was recently. I've been outside when random passerby's have stopped and used the John bc there isn't adequate security. That's a safety issue for me and the neighborhood. If I haven't told you I have 2 children— 11 and 13. In fact, before the fencing was put up my daughter's window, which is only accessible from 707, was shot with a BB gun. The developer tried to blame the children who live to the east; there is a police report for this incident. I also had to call over the weekend because the construction machinery that was left on the lot without a protective barrier was left on for days.

As evidences by the above, this not a project done by a professional form with identification on the plot. In addition to there foregoing, there have been intermittent workers— some that have come at 10 in the evening and parked in front of my house — and the bulk off work has been done during holidays which I do not believe to be coincidence. (For example, after sitting on the house for more than a year, tear down began Easter weekend of 2022.) There are people who have come into my yard without permission— moving by trampoline, cutting down trees on my yard and hooking up to the electrical pole in my yard — I have dogs in addition to my kids. Not until I called the city more than once was it moved to the 707 lot; there was nothing in the materials related to that. Is this because there are no rules about trespassing and connecting dangerous electrical set ups without permission on neighboring properties.

The house was purchased in the spring of 2021, sat for a year, and tear down began in the spring of 2022. It has been over a year of dealing with the nuisance and safety and health issues and the house is nowhere near being done. There is nothing that the builder has done or that the city has overseen that gives me any confidence that the builder has complied with applicable laws and that I will not have water issues or other issues long term as a result of non-compliance. Therefore, I need the information I requested, as noted above, and there's been sufficient time to provide it. If there's no plan on file— please state that clearly. Then I can pursue through appropriate channels how the project got to the current state without a plan. Similarly, if there is not a boundary survey on file, please clearly state that.

Paul, I copied you on my responses to the building dept and made clear that those responses did not adequately respond to my FOIA request nor was it appropriate to expect me to rely on a verbal representation from the builder to the city as to ensuring appropriate grading and drainage. And saying that we will wait until the project is completed is unacceptable as it too late — the final plans need to comply with the approved which is why I asked for and need the approved plans.

I will stop by the office to request an in person meeting with the city manager about this, unless someone responds and lets me know that the materials I requested will be provided today.

Thank you and have a nice weekend.

Sent from my iPhone

On Aug 31, 2023, at 10:04 AM, Paul Antolin <pantolin@gpwmi.us> wrote:

Good morning Christal,

I was under the impression that we provided all the information that was available. Please clarify exactly what it is you're missing. From the correspondence with the building dept. some of the information requested wasn't available until the project was complete. Unless i misunderstood something.

Currently, I'm out of the office but should you come to City Hall, the building dept. should be able to help clarify your questions.

Thank you.
Paul

Sent from my iPhone

On Aug 31, 2023, at 8:11 AM, Christal Lint <lintcl@yahoo.com> wrote:

CAUTION: This email originated from outside of the organization. DO NOT click links, open attachments or reply to this message unless you recognize the sender and know the content is safe:

Good morning Paul,

It's now been several weeks since filing my requests and I've not yet received a full set of responsive materials. I plan to come up to the office this afternoon to retrieve those documents so that I can meet with my engineer before the holiday weekend.

Thank you.
Christal

Sent from my iPhone

On Aug 21, 2023, at 1:37 PM, Christal Lint <lintcl@yahoo.com> wrote:

Thank you. I will follow up Thursday if I don't hear back before then as that will be two weeks from my original requests. Have a great week.

Sent from my iPhone

On Aug 21, 2023, at 12:55 PM, Paul Antolin <pantolin@gpwmi.us> wrote:

Good afternoon Christal,

I've forwarded your email to the Building Official, Bruce Eck.

I did not respond to your questions as I am unsure of the definite answers and more importantly, did not want to misinform you.

If there are any further questions, feel free to contact me.

Thank you,

**Paul P. Antolin, MiPMC
City Clerk**

City of Grosse Pointe Woods – Clerk's Office
20025 Mack Plaza Dr.
Grosse Pointe Woods, MI 48236-2397
Phone: 313-343-2440
Fax: 313-343-5667

From: Christal Lint <lintcl@yahoo.com>
Sent: Wednesday, August 16, 2023 8:04 AM
To: Paul Antolin <pantolin@gpwmi.us>
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud

CAUTION: This email originated from outside of the organization. DO NOT click links, open attachments or reply to this message unless you recognize the sender and know the content is safe:

Hi Paul,

Thanks again for the documents. I've had a chance to review the attached and I've sent the plan drawing on to my engineers to review and

come by check out the structure to see if there are any obvious conflicts between approved plan and what's been built. I do have a few questions/comments on the remaining items.

The items emailed do not seem to fully respond to my request. For example, I asked for the soil erosion plan and other plan items related to water flow (different than, but in addition to the topographic survey) but I do not see it in the materials provided. Could you please provide all plans, including soil erosion and plans dealing with water flow, drainage, sewage, grading of land— all of which were in my original request of Aug. 10, 2023. If the city does not have these items, could you please confirm via email that no such plans were submitted and approved by the developer?

Additionally, I see that there was an inspection for inadequate fencing but there was no violation found. I don't understand how that's possible— I called in about the lack of any fencing and following my call he put up a fence. I'd like to request via FOIA, copies all communications between the property owner and the city regarding the fence and the other enforcement item— demolishing the garage without a permit. Please let me know if this email request is sufficient or if I should stop by the office to fill out a FOIA form. I understand that these requested communications are under a different request and therefore have a different time frame for response.

Regards,
Christal

Sent from my iPhone

On Aug 14, 2023, at 10:59 AM,
Christal Lint <lintcl@yahoo.com>
wrote:

Thank you very much, Paul.

Sent from my iPhone

On Aug 14, 2023, at
10:57 AM, Paul
Antolin
<pantolin@gpwm.us>
wrote:

Good morning,

Please see the
attached response
regarding your CC
23-32 FOIA request.

Per our discussion
this morning, I will
follow-up on your
additional request
for the Boundary,
topographic surveys
& Soil plan for 707 N.
Renaud.

If you have any
further questions,
feel free to contact
me.

Thank you,

Paul P. Antolin,
MiPMC
City Clerk
City of Grosse
Pointe Woods –
Clerk's Office

20025 Mack Plaza
Dr.
Grosse Pointe
Woods, MI 48236-
2397
Phone: 313-343-
2440
Fax: 313-343-
5667

Property of the City
of Grosse Pointe
Woods. If you have
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transmission in
error, please delete
immediately.

<E221138_Redacted.pdf>

<707 n renaud

building

pemrit_Redacted.pdf>

<707 n renaud demo

permit_Redacted.pdf>

<707 s renaud site

plan.pdf>

<E221122_Redacted.pdf>

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immediately.

Property of the City of Grosse Pointe Woods. If you have received this
transmission in error, please delete immediately.

Property of the City of Grosse Pointe Woods. If you have received this transmission in error,
please delete immediately.

From: [Mollie Mackinnon](#)
To: [Sam Woodrick](#)
Subject: FW: CC 23-31 FOIA request - 707 N. Renaud— NEW ACTIVITY - RESPONSE REQUIRED.
Date: Wednesday, September 13, 2023 4:13:45 PM

From: Paul Antolin <pantolin@gpwmi.us>
Sent: Wednesday, September 13, 2023 4:13 PM
To: Christal Lint <lintcl@yahoo.com>
Cc: Bruce Eck <beck@mcka.com>; Mollie Mackinnon <mmackinnon@gpwmi.us>; City Clerk <CityClerk@gpwmi.us>; Frank Schulte <fschulte@gpwmi.us>; Susan Como <SComo@gpwmi.us>
Subject: RE: CC 23-31 FOIA request - 707 N. Renaud— NEW ACTIVITY - RESPONSE REQUIRED.

Good afternoon Christal,

According to the Building Dept. you were given all documents available in response to your FOIA request. I was informed that a representative from the Building Dept. will be contacting you shortly.

At this time, I have no further information for you, other than the Building representative that contacts you should be able to answer any questions you may have.

Thank you and have a nice day.

Paul P. Antolin, MiPMC
City Clerk

City of Grosse Pointe Woods – Clerk’s Office
20025 Mack Plaza Dr.
Grosse Pointe Woods, MI 48236-2397
Phone: 313-343-2440
Fax: 313-343-5667

From: Christal Lint <lintcl@yahoo.com>
Sent: Wednesday, September 13, 2023 12:14 PM
To: Paul Antolin <pantolin@gpwmi.us>
Cc: Bruce Eck <beck@mcka.com>; Mollie Mackinnon <mmackinnon@gpwmi.us>; City Clerk <CityClerk@gpwmi.us>; Frank Schulte <fschulte@gpwmi.us>; Susan Como <SComo@gpwmi.us>
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud— NEW ACTIVITY - RESPONSE REQUIRED.

CAUTION: This email originated from outside of the organization. DO NOT click links, open attachments or reply to this message unless you recognize the sender and know the content is safe:

Hi,

There are landscapers dropping off a bunch of stuff right now at 707 (including many Arborvitae)

which, after over a week of no outside work, suggests to me that they're planning to plant them without addressing grading and other requirements pursuant to an approved plan.

Paul, do you have all the documents responsive to my FOIA request?

Sent from my iPhone

On Sep 13, 2023, at 10:53 AM, Christal Lint <lintcl@yahoo.com> wrote:

Following up on this as we've not heard anything in over a week.

Sent from my iPhone

On Sep 5, 2023, at 4:32 PM, Christal Lint <lintcl@yahoo.com> wrote:

Hi Paul,

I just wanted to reiterate that the issues are not limited to those that I outlined in my correspondence related to my property, such as the mold in my basement from water runoff from 707. As I mentioned, several other homeowners on N. Renaud have issues with 707 and would like to speak to the City Manager (I've been told by the engineer I retained that he/she is the appropriate city official to meet with), and many of these issues will not be able to be resolved in the absence of the materials requested by my FOIA requests being provided prior to a meeting. In other words, without those materials— particularly the plans that were submitted and approved— it's unclear how anyone would be able to have a meaningful discussion.

Nevertheless, I understand that you are simply conveying a message. And I'm simply clarifying the record to the extent that it was unclear.

Thank you.

Sent from my iPhone

On Sep 5, 2023, at 4:07 PM, Paul Antolin <pantolin@gpwmi.us> wrote:

Good afternoon Christal,

I just spoke with the City Administrator, Frank Schulte. He will be meeting with Building Official Bruce Eck and McKenna

(Building Services) tomorrow to discuss your issue with 707 N. Renaud.

After their meeting, they will reach out to you to further discuss the matter and answer any further questions you may have.

Feel free to contact me if you have any questions.

Thank you,

**Paul P. Antolin, MiPMC
City Clerk**

City of Grosse Pointe Woods – Clerk’s Office
20025 Mack Plaza Dr.
Grosse Pointe Woods, MI 48236-2397
Phone: 313-343-2440
Fax: 313-343-5667

From: Christal Lint <lintcl@yahoo.com>
Sent: Tuesday, September 5, 2023 8:56 AM
To: Paul Antolin <pantolin@gpwmi.us>
Cc: Bruce Eck <beck@mcka.com>; Mollie Mackinnon <mmackinnon@gpwmi.us>; City Clerk <CityClerk@gpwmi.us>; Frank Schulte <fschulte@gpwmi.us>; Susan Como <SComo@gpwmi.us>
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud

CAUTION: This email originated from outside of the organization. DO NOT click links, open attachments or reply to this message unless you recognize the sender and know the content is safe:

Thank you. I was planning to head up to request the meeting on behalf of my husband and I and the three owners who I’ve spoken to this far who would like to meet as well. In light of your email, I’ll hold off with the expectation that the response I receive will address this request.

Thanks again.

Sent from my iPhone

On Sep 5, 2023, at 8:49 AM, Paul Antolin

<pantolin@gpwmi.us> wrote:

Good morning Christal,

I apologized for the late response as I was out of town for family medical reasons.

I am including the City Administrator and Assistant City Administrator on this email so they are aware of your request. You should be receiving a response shortly.

If you have any further questions, feel free to contact me.

Thank you,

**Paul P. Antolin, MiPMC
City Clerk**

City of Grosse Pointe Woods – Clerk’s Office
20025 Mack Plaza Dr.
Grosse Pointe Woods, MI 48236-2397
Phone: 313-343-2440
Fax: 313-343-5667

From: Christal Lint <lintcl@yahoo.com>
Sent: Friday, September 1, 2023 8:25 AM
To: Paul Antolin <pantolin@gpwmi.us>
Cc: Bruce Eck <beck@mcka.com>; Mollie Mackinnon <mmackinnon@gpwmi.us>; City Clerk <CityClerk@gpwmi.us>
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud

CAUTION: This email originated from outside of the organization. DO NOT click links, open attachments or reply to this message unless you recognize the sender and know the content is safe:

Good morning Paul,

I am sending this email for the benefit of your files on the issues we’ve been discussing.

I did not receive a response to my email below, therefore today I will be requesting a meeting with the City Manager. I also note for the record, that the meeting request will include several neighbors /homeowners on N Renaud as well. After speaking to a few neighbors yesterday, I learned that many home owners on N Renaud have concerns similar to mine and several have called the building department — and in some instances the PD — about those issues. As of now, there are three other homeowners in addition to myself who want to meet with the City Manager, and based on my conversation with those owners, I expect the number of participants from N Renaud to expand.

I noticed that you copied someone with a city manager email address in your email yesterday, and that address is included in this email. If the City Manager or someone from their office is in fact on this email, it would be much appreciated if a response with available times to meet with myself and the other homeowners on N Renaud could be provided via email, rather than having me come in person to the office this morning to request the same.

Thank you.
Christal

Sent from my iPhone

On Aug 31, 2023, at 11:02 AM,
Christal Lint <lintcl@yahoo.com>
wrote:

I do not have a copy of my request as I provided them to you, but the following is what I asked for, even if not word for word: (1)

all plans for 707 N Renaud, including (but not limited to) all to plans relating to grading, soil erosion, sewage and water run off; (2) the boundary survey; (3) the topographic survey ; (4) all approvals of those plans; (5) any enforcement activity for code violations and (6) all communications between the city and developer relating to code violation issues.

As you'll recall, the only things I was provided were (1) the topographic survey and (2) documents related to a violation for tearing down the garage without a permit, which I understand to have included the wall that was supposed to be left up to make the construction a rehab rather than new construction; there are obviously significant implications for this violation including what was required to be submitted and approved and property tax implications. This is why I asked for correspondence regarding violations. The second violation related to not having fencing up. The document indicates there was no violation, and the building rep said in an email there is no requirement for fencing. (I find that hard to believe because that allows and did allow until I insisted something be put up, a giant hole in the ground and construction materials and machinery that is accessible by the kids in the neighborhood and any passerby's , not to mention that we all had to look at it daily.)

If it's not obvious at this point, the issues with 707 go far beyond the water issue, although that is the most pressing in terms of damage to my property and what is likely to be damage to other bordering properties. It is an issue now and without an approved plan that complies with code for grading and water run off, it will be an issue long term. Currently the building has dug drainage ditches along my property and the property to the east — I would say at least a foot below the grade of my lot— and coupled with the altered grading of the lot as a whole — meaning the house is on a hill in the center and pitched away towards my property — now the water stands and has flowed into my basement at the corner and I now have mold growing in my basement. Aside from the mold inside being a health issue, the standing water is a health issue, particularly given the increase in bugs and rodents. Notable it also runs along the porta-potty on the lot, which has been dumped probably once and it was recently. I've been outside when random passerby's have stopped and used the John bc there isn't adequate security. That's a safety issue for me and the neighborhood. If I haven't told you I have 2 children— 11 and 13. In fact, before the fencing was put up my daughter's window, which is only accessible from 707, was shot with a BB gun. The developer tried to blame the children who live to the east;

there is a police report for this incident. I also had to call over the weekend because the construction machinery that was left on the lot without a protective barrier was left on for days.

As evidences by the above, this not a project done by a professional form with identification on the plot. In addition to there foregoing, there have been intermittent workers— some that have come at 10 in the evening and parked in front of my house — and the bulk off work has been done during holidays which I do not believe to be coincidence. (For example, after sitting on the house for more than a year, tear down began Easter weekend of 2022.) There are people who have come into my yard without permission— moving by trampoline, cutting down trees on my yard and hooking up to the electrical pole in my yard — I have dogs in addition to my kids. Not until I called the city more than once was it moved to the 707 lot; there was nothing in the materials related to that. Is this because there are no rules about trespassing and connecting dangerous electrical set ups without permission on neighboring properties.

The house was purchased in the spring of 2021, sat for a year, and tear down began in the spring of 2022. It has been over a year of dealing with the nuisance and safety and health issues and the

house is nowhere near being done. There is nothing that the builder has done or that the city has overseen that gives me any confidence that the builder has complied with applicable laws and that I will not have water issues or other issues long term as a result of non-compliance. Therefore, I need the information I requested, as noted above, and there's been sufficient time to provide it. If there's no plan on file— please state that clearly. Then I can pursue through appropriate channels how the project got to the current state without a plan. Similarly, if there is not a boundary survey on file, please clearly state that.

Paul, I copied you on my responses to the building dept and made clear that those responses did not adequately respond to my FOIA request nor was it appropriate to expect me to rely on a verbal representation from the builder to the city as to ensuring appropriate grading and drainage. And saying that we will wait until the project is completed is unacceptable as it too late — the final plans need to comply with the approved which is why I asked for and need the approved plans.

I will stop by the office to request an in person meeting with the city manager about this, unless someone responds and lets me know that the materials I requested will be provided today.

Thank you and have a nice weekend.

Sent from my iPhone

On Aug 31, 2023, at 10:04 AM, Paul Antolin <pantolin@gpwmi.us> wrote:

Good morning
Christal,

I was under the impression that we provided all the information that was available. Please clarify exactly what it is you're missing.

From the correspondence with the building dept. some of the information requested wasn't available until the project was complete. Unless i misunderstood something.

Currently, I'm out of the office but should you come to City Hall, the building dept. should be able to help clarify your questions.

Thank you.
Paul

Sent from my iPhone

On Aug
31,
2023,
at 8:11
AM,
Christal
Lint
<lintcl@yahoo.com>
wrote:

CAUTION
This
email
originated
from
outside
of the
organization.
DO
NOT
click
links,
open
attachments
or
reply
to this
message
unless
you
recognize
the
sender
and
know
the
content
is
safe.

Good

morning
Paul,

It's now
been
several
weeks
since
filing
my
requests
and I've
not yet
received
a full
set of
responsive
materials.
I plan
to
come
up to
the
office
this
afternoon
to
retrieve
those
documents
so that
I can
meet
with
my
engineer
before
the
holiday
weekend.

Thank
you.
Christal

Sent
from
my
iPhone

On
Aug
21,
2023,
at
1:37
PM,
Christal
Lint
<lintcl@yahoo.com>
wrote:

Thank
you.
I
will
follow
up
Thursday
if
I
don't
hear
back
before
then
as
that
will
be
two
weeks
from
my
original
requests.
Have
a

great
week.

Sent
from
my
iPhone

On
Aug
21,
2023,
at
12:55
PM,
Paul
Antolin
<pantolin@gpwwmi.us>
wrote:

Good
afternoon
Christal,

I've
forwarded
your
email
to
the
Building
Official,
Bruce
Eck.

I
did
not
respond
to
your
questions

as
I
am
unsure
of
the
definite
answers
and
more
importantly,
did
not
want
to
misinform
you.

If
there
are
any
further
questions,
feel
free
to
contact
me.

Thank
you,

**Paul
P.
Antolin,
MiPMC
City
Clerk**

City
of
Grosse
Pointe
Woods

—
Clerk's
Office

20025
Mack
Plaza
Dr.
Grosse
Pointe
Woods,
MI
48236-
2397
Phone:
313-
343-
2440

Fax:
313-
343-
5667

From:
Christal
Lint
<lintcl@yahoo.com>

Sent:
Wednesday,
August
16,
2023
8:04
AM

To:
Paul
Antolin
<pantolin@gpwmi.us>

Subject:
Re:
CC
23-
31
FOIA
request
-
707
N.
Renaud

|



Hi
Paul,

Thanks
again
for
the
documents.
I've
had
a
chance
to
review
the
attached

and
I've
sent
the
plan
drawing
on
to
my
engineers
to
review
and
come
by
check
out
the
structure
to
see
if
there
are
any
obvious
conflicts
between
approved
plan
and
what's
been
built.
I
do
have
a
few
questions/comments
on
the
remaining
items.

The items emailed do not seem to fully respond to my request. For example, I asked for the soil erosion plan and other plan items related to water flow (different than, but in addition to the topographic survey) but I do not see it

in
the
materials
provided.
Could
you
please
provide
all
plans,
including
soil
erosion
and
plans
dealing
with
water
flow,
drainage,
sewage,
grading
of
land
—
all
of
which
were
in
my
original
request
of
Aug.
10,
2023.
If
the
city
does
not
have
these
items,

could
you
please
confirm
via
email
that
no
such
plans
were
submitted
and
approved
by
the
developer?

Additionally,
I
see
that
there
was
an
inspection
for
inadequate
fencing
but
there
was
no
violation
found.
I
don't
understand
how
that's
possible
—
I
called
in

about
the
lack
of
any
fencing
and
following
my
call
he
put
up
a
fence.
I'd
like
to
request
via
FOIA,
copies
all
communications
between
the
property
owner
and
the
city
regarding
the
fence
and
the
other
enforcement
item
—
demolishing
the
garage
without
a

permit.
Please
let
me
know
if
this
email
request
is
sufficient
or
if
I
should
stop
by
the
office
to
fill
out
a
FOIA
form.
I
understand
that
these
requested
communications
are
under
a
different
request
and
therefore
have
a
different
time
frame
for
response.

Regards,
Christal

Sent
from
my
iPhone

On
Aug
14,
2023,
at
10:59
AM,
Christal
Lint
<lintcl@yahoo.com>
wrote:

Thank
you
very
much,
Paul.

Sent
from
my
iPhone

On
Aug
14,

2023,
at
10:57
AM,
Paul
Antolin
<pantolin@gpwmi.us>
wrote:

Good
morning,

Please
see
the
attached
response
regarding
your
CC
23-
32
FOIA
request.

Per
our
discussion
this
morning,
I
will
follow-
up
on
your
additional
request
for
the
Boundary,
topographic
surveys
&

Soil
plan
for
707
N.
Renaud.

If
you
have
any
further
questions,
feel
free
to
contact
me.

Thank
you,

**Paul
P.
Antolin,
MiPMC
City
Clerk**

City
of
Grosse
Pointe
Woods
—

Clerk's
Office
20025
Mack
Plaza
Dr.
Grosse
Pointe
Woods,
MI
48236-
2397
Phone:
313-
343-

2440

Fax:
313-
343-
5667

Property
of
the
City
of
Grosse
Pointe
Woods.

If
you
have
received
this
transmission
in
error,
please
delete
immediately.

<E221138_Redacted.pdf>
<707

n
renaud
building
pemrit_Redacted.pdf>
<707

n
renaud
demo
permit_Redacted.pdf>
<707

s
renaud
site
plan.pdf>
<E221122_Redacted.pdf>

Property
of
the

City
of
Grosse
Pointe
Woods.
If
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immediately.

Property of the City
of Grosse Pointe
Woods. If you have
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transmission in
error, please delete
immediately.

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From: [Mollie Mackinnon](#)
To: [Sam Woodrick](#)
Subject: FW: CC 23-31 FOIA request - 707 N. Renaud
Date: Tuesday, September 5, 2023 4:30:18 PM

From: Christal Lint <lintcl@yahoo.com>
Sent: Thursday, August 31, 2023 9:12 AM
To: Paul Antolin <pantolin@gpwmi.us>
Cc: Bruce Eck <beck@mcka.com>; Mollie Mackinnon <mmackinnon@gpwmi.us>
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud

CAUTION: This email originated from outside of the organization. DO NOT click links, open attachments or reply to this message unless you recognize the sender and know the content is safe:

Good morning Paul,

It's now been several weeks since filing my requests and I've not yet received a full set of responsive materials. I plan to come up to the office this afternoon to retrieve those documents so that I can meet with my engineer before the holiday weekend.

Thank you.
Christal

Sent from my iPhone

On Aug 21, 2023, at 1:37 PM, Christal Lint <lintcl@yahoo.com> wrote:

Thank you. I will follow up Thursday if I don't hear back before then as that will be two weeks from my original requests. Have a great week.

Sent from my iPhone

On Aug 21, 2023, at 12:55 PM, Paul Antolin <pantolin@gpwmi.us> wrote:

Good afternoon Christal,

I've forwarded your email to the Building Official, Bruce Eck.

I did not respond to your questions as I am unsure of the definite answers and more importantly, did not want to misinform you.

If there are any further questions, feel free to contact me.

Thank you,

Paul P. Antolin, MiPMC
City Clerk

City of Grosse Pointe Woods – Clerk’s Office
20025 Mack Plaza Dr.
Grosse Pointe Woods, MI 48236-2397
Phone: 313-343-2440
Fax: 313-343-5667

From: Christal Lint <lintcl@yahoo.com>
Sent: Wednesday, August 16, 2023 8:04 AM
To: Paul Antolin <pantolin@gpwmi.us>
Subject: Re: CC 23-31 FOIA request - 707 N. Renaud

CAUTION: This email originated from outside of the organization. DO NOT click links, open attachments or reply to this message unless you recognize the sender and know the content is safe:

Hi Paul,

Thanks again for the documents. I’ve had a chance to review the attached and I’ve sent the plan drawing on to my engineers to review and come by check out the structure to see if there are any obvious conflicts between approved plan and what’s been built. I do have a few questions/comments on the remaining items.

The items emailed do not seem to fully respond to my request. For example, I asked for the soil erosion plan and other plan items related to water flow (different than, but in addition to the topographic survey) but I do not see it in the materials provided. Could you please provide all plans, including soil erosion and plans dealing with water flow, drainage, sewage, grading of land— all of which were in my original request of Aug. 10, 2023. If the city does not have these items, could you please confirm via email that no such plans were submitted and approved by the developer?

Additionally, I see that there was an inspection for inadequate fencing but there was no violation found. I don’t understand how that’s possible— I

called in about the lack of any fencing and following my call he put up a fence. I'd like to request via FOIA, copies all communications between the property owner and the city regarding the fence and the other enforcement item— demolishing the garage without a permit. Please let me know if this email request is sufficient or if I should stop by the office to fill out a FOIA form. I understand that these requested communications are under a different request and therefore have a different time frame for response.

Regards,
Christal

Sent from my iPhone

On Aug 14, 2023, at 10:59 AM, Christal Lint
<lintcl@yahoo.com> wrote:

Thank you very much, Paul.

Sent from my iPhone

On Aug 14, 2023, at 10:57 AM, Paul Antolin
<pantolin@gpwwi.us> wrote:

Good morning,

Please see the attached response regarding
your CC 23-32 FOIA request.

Per our discussion this morning, I will follow-up
on your additional request for the Boundary,
topographic surveys & Soil plan for 707 N.
Renaud.

If you have any further questions, feel free to
contact me.

Thank you,

Paul P. Antolin, MiPMC
City Clerk

City of Grosse Pointe Woods – Clerk's Office
20025 Mack Plaza Dr.
Grosse Pointe Woods, MI 48236-2397
Phone: 313-343-2440
Fax: 313-343-5667

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<E221138_Redacted.pdf>

<707 n renaud building pemrit_Redacted.pdf>

<707 n renaud demo permit_Redacted.pdf>

<707 s renaud site plan.pdf>

<E221122_Redacted.pdf>

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