

**TOWNSHIP OF VERONA
BOARD OF ADJUSTMENT APPLICATION**

DATE APPLICATION 5/30/2025

CASE # 2025-10

PROPERTY ADDRESS 546 Bloomfield Avenue a/k/a 10 Park Place

BLOCK 1703 LOT 68 ZONE \$150-17.14 TC

APPLICANT'S NAME Robert Louis o/b/o Palmetto Venues

PHONE # 862 252 1585

CELL PHONE # _____

EMAIL info@palmettovenues.com

PROPERTY OWNER'S NAME Kim Jhan

PROPERTY OWNER'S ADDRESS 599 Bloomfield Avenue, Montclair, NJ 08812

PROPERTY OWNER'S PHONE # 973 493 2996

CELL # _____

PROPERTY OWNER'S EMAIL jhankim76@gmail.com

RELATIONSHIP OF APPLICANT TO OWNER Tenant

REQUEST IS HEREBY MADE FOR PERMISSION TO DO THE FOLLOWING:

To continue operation of Palmetto Venues as an event space as said use was previously approved on August 10, 2023 by the Municipality. To add signage and extend signage as detailed below. For determination of whether ordinance Verona Code Chapter 133-12 is applicable to Palmetto Venues business.

CONTRARY TO THE FOLLOWING:

See attached Letter and Addendum.

LOT SIZE: EXISTING 8,576.96 Sq. Ft. PROPOSED NC TOTAL 8,576.96 Sq. Ft.

HIEGHT: EXISTING 2 Stories PROPOSED NC

PERCENTAGE OF BUILDING COVERAGE: EXISTING NC PROPOSED NC

PERCENTAGE OF IMPROVED LOT COVERAGE: EXISTING NC PROPOSED NC

PRESENT USE Event Space

PROPOSED USE NC

SET BACKS OF BUILDING:	REQUIRED	EXISTING	PROPOSED
FRONT YARD	<u>0 Ft</u>	<u>0</u>	<u>NC</u>
REAR YARD	<u>20 Ft</u>	<u>NC</u>	<u>NC</u>
SIDE YARD (1)	<u>0 Ft.</u>	<u>0</u>	<u>NC</u>
SIDE YARD (2)	<u>0 Ft.</u>	<u>0</u>	<u>NC</u>

DATE PROPERTY WAS ACQUIRED 07/31/1996

TYPE OF CONSTRUCTION PROPOSED:

N/A

SIGN INFORMATION (if applicable): supply details on location, dimensions, height and illumination

~~Extension of approved Signage: Addition of removable Ivy Styling around rear sign. Rear sign approved by Permit #2024-000.~~

AREA PER FLOOR (square feet):	EXISTING	PROPOSED	TOTAL
BASEMENT	1,458	NC	1,458
FIRST FLOOR	1,458	NC	1,458
SECOND FLOOR	1,458	NC	1,458
ATTIC	0	NC	0

NUMBER OF DWELLING UNITS: EXISTING NC PROPOSED NC

NUMBER OF PARKING SPACES: EXISTING 3 dedicated spaces PROPOSED NC

History of any previous appeals to the Board of Adjustments and the Planning Board

~~No prior appeals by this applicant.~~

What are the exceptional conditions that warrant relief from compliance with the Zoning Ordinance?

~~Palmetto Venues has been operating on reliance of prior Municipal approvals for one and a half years without issue. Only recently, as of March 19, 2025, have there been any issues with the existing use and condition of the property, which has not substantially changed.~~

Supply a statement of facts showing how relief can be granted without substantial detriment to the public good and without substantially impairing the intent and purpose of the Zone Plan and the Zoning Ordinance

~~See attached Letter and Addendum.~~

History of any deed restrictions:

~~None.~~

A legible plot plan or survey to scale (not less than 1"=100') of the property indicating the existing and/or proposed structure and scale drawings of the existing and/or proposed structure must be provided.

A copy of any conditional contract relating to this application must be filed with this application.

If the applicant is a corporation or partnership, the names, addresses and phone numbers of those owning a 10% or greater interest in the corporation shall be provided.

Name Robert Louls Address 49 West Mount Pleasant Ave., #199, Livingston, NJ 07039 Phone # 862 252 1585

Name _____ Address _____ Phone # _____

Name _____ Address _____ Phone # _____

Name _____ Address _____ Phone # _____

Expert witness(es) that will present evidence on behalf of this application:

Attorney: Name Nicholas J. Palma, Esq. and Alec Q. Duffy, Esq.
Address 1425 Broad Street, Clifton, NJ 07013
Phone # 973 471 1121
Fax # 973 472 0032
Email nicholaspalma@palmalawfirm.com / aduffy@palmalawfirm.com

Architect/Engineer: Name _____
Address _____
Phone # _____
Fax # _____
Email _____

Planner: Name _____
Address _____
Phone # _____
Fax # _____

BOARD OF ADJUSTMENT APPLICATION SITE PLAN

O INDICATES SHRUBS OR TREES
X INDICATES FENCES

NEIGHBOR'S HOUSE
ESTIMATE DISTANCE FROM
THE PROPOERTY LINE

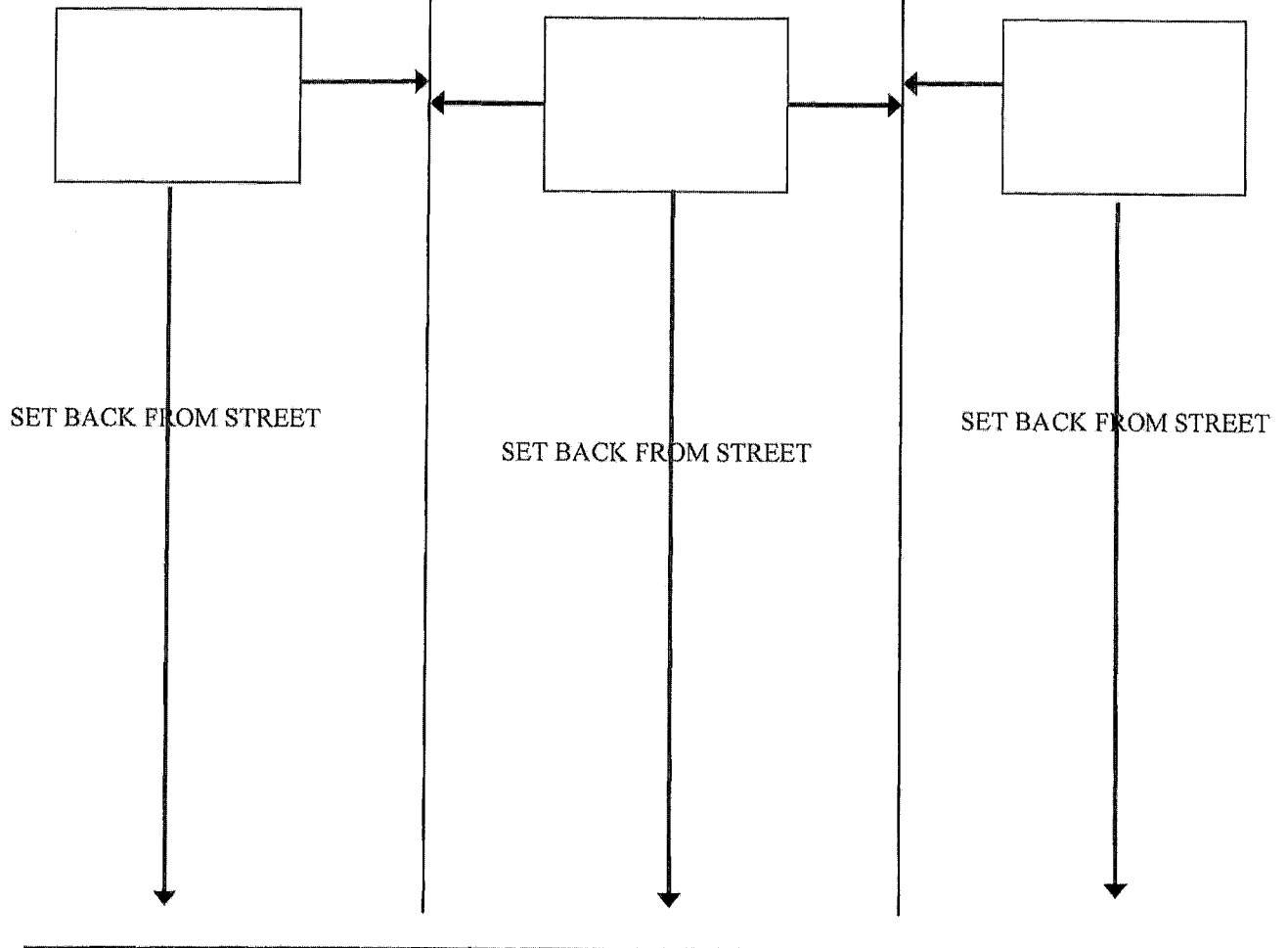
HOUSE ON LEFT

APPLICANT'S HOUSE
SHOW THE DISTANCE TO THE
PROPERTY LINE FROM
SURVEY

CENTER HOUSE

NEIGHBOR'S HOUSE
ESTIMATE DISTANCE FROM
THE PROPOERTY LINE

HOUSE ON RIGHT

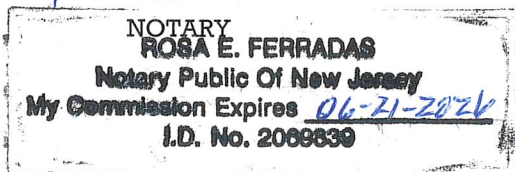
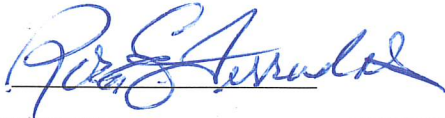


STREET

AFFIDAVIT OF OWNERSHIP

STATE OF NEW JERSEY
COUNTY OF ESSEX

Kim Jhan, Partner, _____ OF FULL AGE, BEING DULY SWORN ACCORDING TO LAW ON
OATH DEPOSED AND SAYS, THAT DEPONENT RESIDES AT 642 Bloomfield Avenue, IN THE CITY OF
Verona IN THE COUNTY OF Essex AND STATE OF New Jersey AND THAT
KW & HZ Corp. IS THE OWNER IN FEE OF ALL THAT CERTAIN LOT, PIECE OF LAND,
SITUATED, LYING AND BEING IN THE TOWNSHIP OF VERONA AFORESAID AND KNOWN AND DESIGNATED AS
BLOCK 1703 AND LOT 68 AS SHOWN ON THE TAX MAPS OF THE TOWNSHIP OF VERONA.

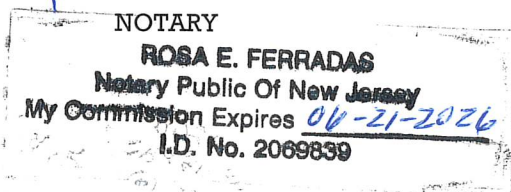


OWNER

AFFIDAVIT OF APPLICANT

COUNTY OF ESSEX
STATE OF NEW JERSEY

Robert Louis d/b/a Palmetto Venues OF FULL AGE, BEING DULY SWORN ACCORDING TO LAW, ON
OATH DEPOSED AND SAYS THAT ALL OF THE ABOVE STATEMENTS CONTAINED IN THE PAPERS SUBMITTED
HEREWITH ARE TRUE. SWORN TO AND SUBSCRIBED BEFORE ME ON THIS 30th DAY OF May
2025.



APPLICANT

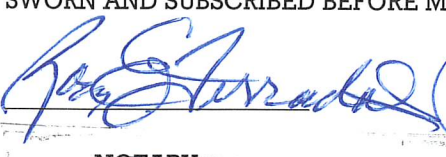
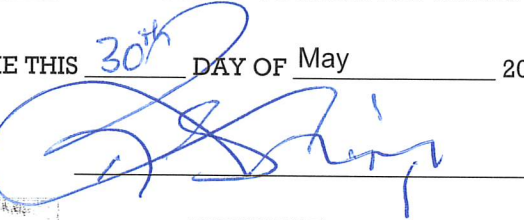
AUTHORIZATION

IF ANYONE OTHER THAN THE OWNER IS MAKING THIS APPLICATION, THE FOLLOWING AUTHORIZATION MUST BE EXECUTED.

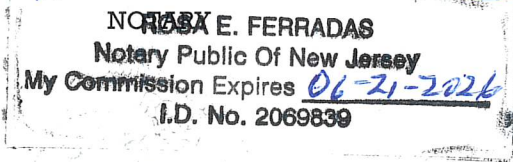
TO THE BOARD OF ADJUSTMENT

Robert Louis o/b/o Palmetto Venues IS AUTHORIZED TO MAKE THE WITHIN APPLICATION.

SWORN AND SUBSCRIBED BEFORE ME THIS 30th DAY OF May 2025.

APPLICANT



Jul 11 '36 9:57 FROM COPENHAGEN

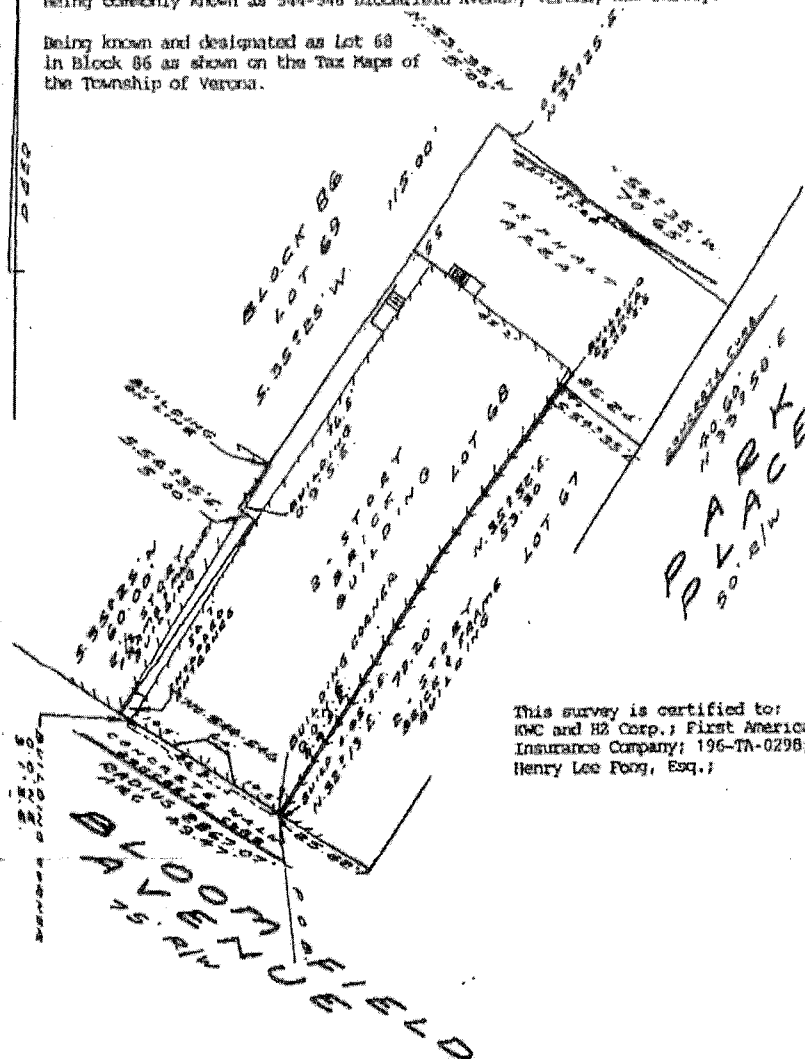
73 10142 14504

7-11-82 2-10-82 3-10-82

☒ Property corners have not been set per written agreement.

Being commonly known as 544-546 Bloomfield Avenue, Verona, New Jersey.

Being known and designated as Lot 68
in Block 86 as shown on the Tax Maps of
the Township of Verona.



This survey is certified to:
KWC and HZ Corp.; First American Title
Insurance Company; 196-TA-0298;
Henry Lee Fong, Esq.;

SURVEY SKETCH FOR
LOT 68, BLOCK 86

SITUATED IN THE
 TOWNSHIP OF VERONA, ESSEX COUNTY, NJ

THE OFFSETS IS-CHINE ARE NOT TO BE USED FOR THE CONSTRUCTION OF ANY STRUCTURE, FENCE, PERMANENT ADDITION, ETC.

I HEREBY CERTIFY TO THE BEST OF MY KNOWLEDGE, BELIEF,
AND INFORMATION, THAT THIS SURVEY HAS BEEN PERFORMED IN
ACCORDANCE WITH CURRENTLY ACCEPTED ACCURACY STANDARDS

Harold L. La Torre

HARVEY L. LATERRE N.J.L.S. No. 19461

**MID ATLANTIC LAND
SERVICES, INC.**

**BRIAR RIDGE PLAZA
440 SOUTH MAIN STREET
MILLTOWN, NEW JERSEY 08850
(908) 651-1320
(908) 651-1724 FAX**

This information is to be used only in human exposed portion for purposes similar marriage of human defendant properly by the named persons. The responsibility of this is to be assumed by the person for the use of any of the any other persons including but not limited to use of carrying the survey followed, name of person or he any other person and listed in certificate after strictly or otherwise.

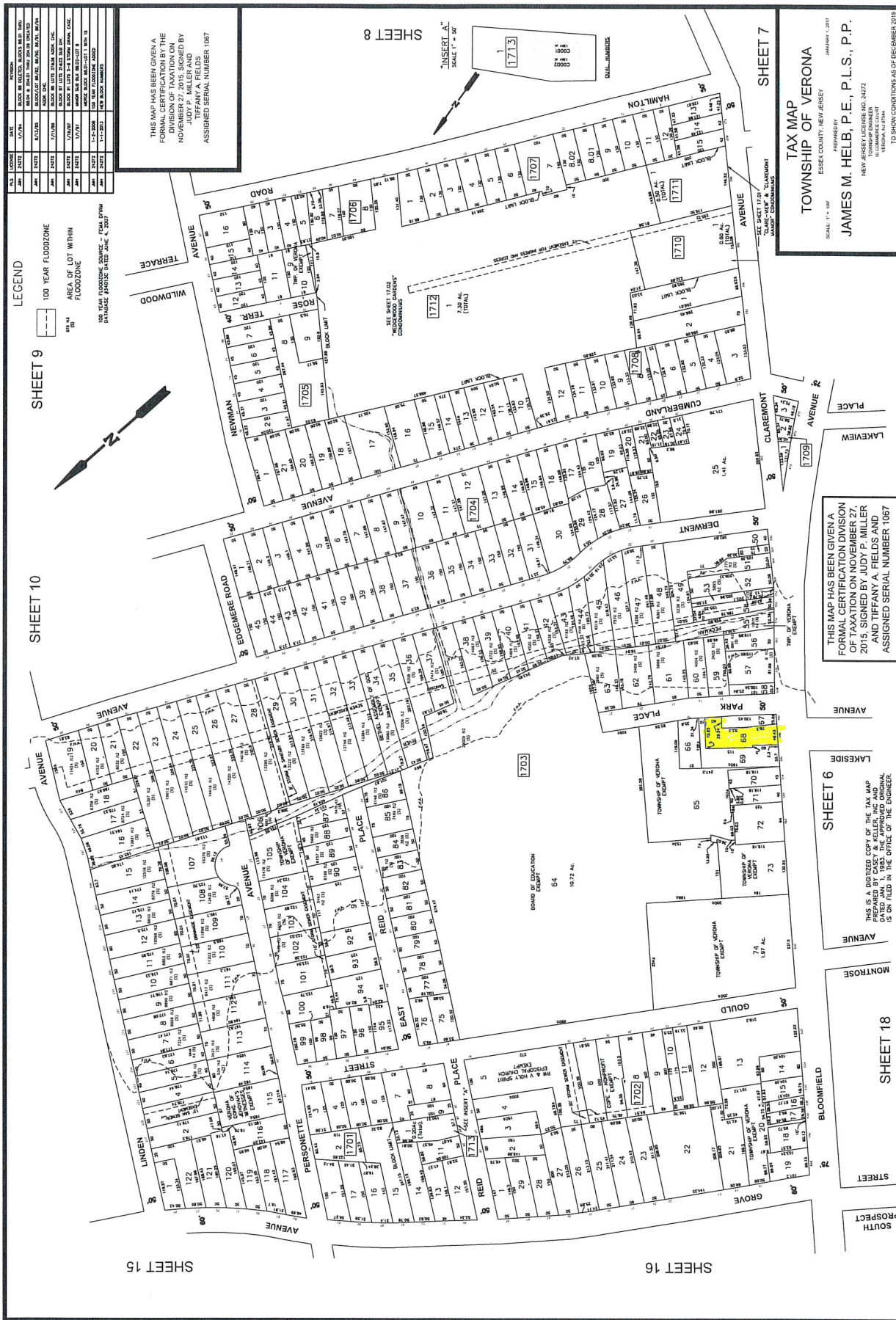
Scale 1" = 30'	Date 7-12-96	Drawn by: <i>DDG</i> CHK by:
Field Book No. <i>FOLDER</i>	Page No.	File No. <i>96-07-40</i>







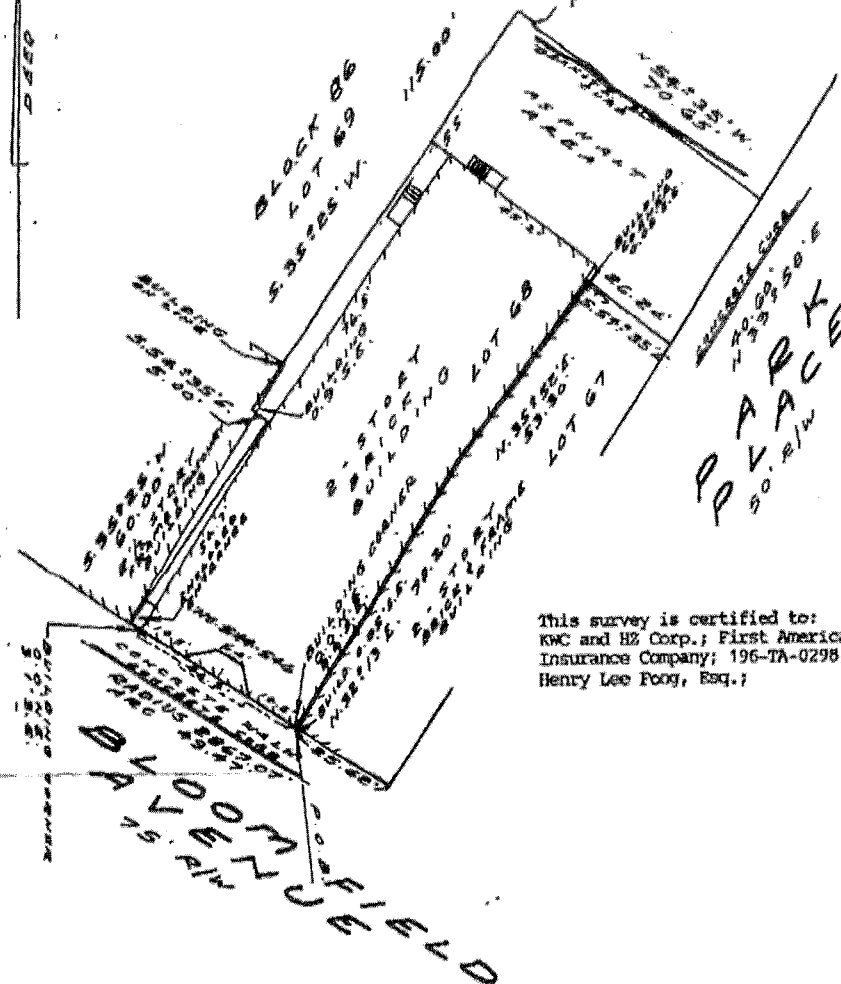




Property corners have not been set per written agreement.

Being commonly known as 544-546 Bloomfield Avenue, Verona, New Jersey.

Being known and designated as Lot 68
in Block 86 as shown on the Tax Maps of
the Township of Verona.



This survey is certified to:
KWC and HZ Corp.; First American Title
Insurance Company; 196-TA-0298;
Henry Lee Pooy, Esq.;

SURVEY SKETCH FOR LOT 68, BLOCK 86

SITUATED IN THE
TOWNSHIP OF VERONA, ESSEX COUNTY, NJ

THE OFFICIAL'S DRAWING IS NOT TO BE USED FOR THE CONSTRUCTION OF ANY STRUCTURE, FENCE, PERMANENT ADDITION, ETC.

I HEREBY CERTIFY TO THE BEST OF MY KNOWLEDGE, BELIEF,
AND INFORMATION, THAT THIS SURVEY HAS BEEN PERFORMED IN
ACCORDANCE WITH CURRENTLY ACCEPTED ACCURACY STANDARDS

Harvey L. LaTierre

HARVEY L. LATIERRE N.J.L.S. No. 19461

MID ATLANTIC LAND SERVICES, INC.

BRIAR RIDGE PLAZA
440 SOUTH MAIN STREET
MILLTOWN, NEW JERSEY 08860
(908) 651-1320
(908) 651-1724 FAX

This certification is made only to persons named herein for purposes stated
herein and is not to be used for any other purpose. No
responsibility for liability is assumed by the surveyor for any
other purpose including but not limited to use of survey for survey without
results of property or to any other purpose not stated in certification other
than as stated.

Scale 1"=30'	Date 7-12-96	Drawn by: DDC
Field Book No. FOLDER	Page No.	File No. 96-07-40

Nicholas J. Palma, Esq. ♦ ≈
NicholasPalma@PalmaLawFirm.com

Valerie Palma DeLuisi, Esq. ♦ ≈
VPD@PalmaLawFirm.com

♦ Member NJ Bar
≈ Member NY Bar
○ Member PA Bar

Palma Law Firm

A Professional Corporation

Phone: 973-471-1121 | Facsimile: 973-472-0032
www.PalmaLawFirm.com

David Heintjes, Esq. ♦
DJH@PalmaLawFirm.com

Kiana L. Bracciodieta, Esq. ♦
KLB@PalmaLawFirm.com

Alec Q. Duffy, Esq. ♦ ○
ADuffy@PalmaLawFirm.com

May 30, 2025

ADDENDUM TO VARIANCE APPLICATION

Applicant: Palmetto Venues
Property Address: 546 Bloomfield Avenue a/k/a 10 Park Place
Block: 1703 Lot: 68
Zoning District: §150-17.14 TC (Town Center)

APPLICATION NO.:
HEARING DATE:

This Addendum is submitted in further support of the Applicant's pending Variance Application for the continued operation of an event space at the above-referenced property, for approval of an extension of signage, for determination of the applicability of Verona Code Chapter 113-12 to Applicant, and for administrative appeal. The Applicant respectfully supplements the record to clarify and request the following relief:

1. Clarification of Permitted Use in the TC Zone

On or about August 10, 2023, Verona Zoning Official Phillip Epps determined that the proposed use of the subject premises as an event space is permitted within the Town Center (TC) Zoning District. Since this approval, up until March 2025, for one and a half years, Applicant has operated his business without issue.

Nevertheless, a D(1) use variance was sought and/or granted to ensure clarity and certainty in zoning compliance. The Applicant reaffirms that the use is consistent with the goals and purposes of the TC Zone, including the promotion of pedestrian activity, community engagement, and mixed-use development.

2. Extension of Previously Approved Signage

The Applicant seeks approval for an extension of signage previously approved Permit #2024-163. The existing signage was already reviewed and found compliant; the requested extension involves a modest increase in visibility or dimensional adjustments and does not propose new signage types. The extension will enhance the public's ability to locate the venue and will remain harmonious with the aesthetics of the TC Zone.

3. Inapplicability of Liquor-Related Window Ordinance

The Applicant also respectfully seeks formal confirmation that Verona Code Chapter 133-12, regulating window transparency for liquor-serving establishments, is inapplicable to this

business. The Event Space does not serve nor sell alcohol on-site. As such, the ordinance provisions concerning window visibility or display obstructions tied to liquor selling or dispensing establishments have no bearing on this business.

4. Public Benefit and Undue Hardship

Granting the requested variance and related relief is inherently beneficial to the public good, as the Event Space provides a vital community gathering place for social, cultural, educational, and celebratory functions. In the absence of such venues, residents are deprived of important opportunities for collective engagement, expression, and belonging—core values aligned with the general welfare and public interest.

Moreover, denial of the requested relief would impose a substantial and undue hardship upon the Applicant. The business is subject to an active lease with rent that remains due and owing, but has been precluded from conducting operations due to zoning uncertainty and pending approvals. The Applicant is unable to generate revenue without being permitted to operate, and continued delay threatens the viability of the business and may result in permanent closure and associated economic loss to both the Applicant and the community.

5. Reservation of Rights

The Applicant expressly reserves the right to amend, supplement, or expand this Addendum and the underlying application as necessary or appropriate, including but not limited to submission of additional factual information, expert reports, or requests for ancillary relief, prior to the date of the public hearing or as may be permitted by the Zoning Board of Adjustment.

CONCLUSION

For the foregoing reasons, the Applicant respectfully requests that the Board grant the relief requested herein, including:

Approval of the extension to previously approved signage;

Formal determination of the inapplicability of the liquor-service window ordinance; and

Consideration of the inherently beneficial nature of the use and the undue hardship imposed by any continued restriction on operations.

Respectfully submitted,
/s/ Nicholas J. Palma
Nicholas J. Palma, Esq.

NJP/ad

Nicholas J. Palma, Esq. ♦ ≈
NicholasPalma@PalmaLawFirm.com

Valerie Palma DeLuisi, Esq. ♦ ≈
VPD@PalmaLawFirm.com

♦ Member NJ Bar
≈ Member NY Bar
○ Member PA Bar

Palma Law Firm

A Professional Corporation

Phone: 973-471-1121 | Facsimile: 973-472-0032

www.PalmaLawFirm.com

David Heintjes, Esq. ♦
DJH@PalmaLawFirm.com

Kiana L. Bracciodieta, Esq. ♦
KLB@PalmaLawFirm.com

Alec Q. Duffy, Esq. ♦ ○
ADuffy@PalmaLawFirm.com

April 30, 2025

Via Electronic Mail & FedEx Overnight (trk: 8809 3427 8200)

ATTN: Kathleen Meisch, *Zoning Official & Board Secretary*
Township of Verona Zoning Board of Adjustment
880 Bloomfield Avenue
Verona, New Jersey 07044
kmiesch@veronanj.org

Essex County Board of Appeals (trk: 8809 3439 9186)
900 Bloomfield Avenue
Verona, NJ 07044

**RE: Zoning Permit #2023-139 / Fire Code Violations / Zoning Permit #2024-169 /
Garbage / HVAC / Window Ordinance**
Applicant/Owner: Robert Louis o/b/o Palmetto Venues
Property: 546 Bloomfield Avenue a/k/a 10 Park Place
Block 1703 Lot 68

Dear Ms. Meisch,

Please be advised that the undersigned has been retained to represent Robert Louis o/b/o Palmetto Venues regarding the preparation of a variance application and appeal of various code violations alleged against the above-referenced property.

I am in receipt of your letter dated March 17, 2025. In accordance therewith, my client hereby provides notice of intent to seek relief from the Board of Adjustment pursuant to N.J.S.A. 40:55D-70(a) and appeal the various alleged code violations pursuant to the Administrative Procedure Act. As such, for the sake of administrative efficiency, my client respectfully requests a consolidated hearing to address all matters pertaining to the above-referenced property. The reasons underlying this appeal and application are as follows:

Detrimental Reliance on Zoning Official's Official Acts

On or about August 10, 2023, Verona Zoning Official Phillip Epps approved my client's variance application to operate an event rental space at 546 Bloomfield Avenue ("Subject Property"). **Exhibit A.** Within which, Mr. Epps correctly stated that operating an event space was permitted by the zoning regulation 150-17.14 TC. Since this approval, up until March 2025, for one and a half years, my client has operated his business without issue. Now, suddenly, it is alleged

that Mr. Epps' actions were ultra vires and deemed void as a result. My client respectfully disagrees with this conclusory statement.

The doctrine of detrimental reliance or equitable estoppel precludes Verona Township ("Municipality") from invalidating the Zoning Official's prior approval upon which my client relied in good faith for over a year and a half. Although zoning officials have limited statutory authority under N.J.S.A. 40:55D-18, New Jersey courts have long recognized that estoppel may apply against governmental entities where a party relies on a governmental act in good faith, to their detriment, and where the public interest would not be harmed.

In this matter, Mr. Epps issued a zoning permit or approval—on municipal letterhead and in an official capacity—indicating that my client's event space business use was permitted. Following said approval, my client, without knowledge or notice of any alleged defect or overreach in authority, invested substantial time, money, and resources in launching and operating Palmetto Venues based on that approval. This includes but is not limited to leasehold improvements, contractual obligations, licensing, staffing, and marketing. Verona Township stood by silently for 18 months, during which the business openly operated, collected inspections, and paid taxes, without any objection.

The New Jersey Supreme Court has held that equitable estoppel may be invoked against a governmental entity in limited circumstances to prevent manifest injustice. See Gruber v. Mayor of Raritan Twp., 39 N.J. 1, 13 (1962): "While estoppel is not generally applied against the government, it may be invoked in exceptional cases where interests of justice, morality and common fairness clearly dictate that course." See also Vas v. Roberts, 418 N.J. Super. 509, 523 (App. Div. 2011): "Where a municipal official, acting within the apparent scope of authority, affirmatively misleads a party who reasonably relies to their detriment, estoppel may bar the municipality from disavowing the conduct."

Mr. Epps, in his official capacity as Zoning Official of Verona Township in August 2023, acted under color of authority and gave no indication that his approval of Palmetto Venue's use and operation was invalid or conditional. Verona Township's own conduct created a reasonable expectation that the business was lawfully established. To now revoke or nullify that permission retroactively, without fault on the part of my client, would not only violate fundamental fairness but also invite economic harm based solely on an internal procedural defect.

While we will concede that governmental bodies generally cannot be estopped from asserting the ultra vires nature of unauthorized acts (A.A. Mastrangelo, Inc. v. DEP, 90 N.J. 666 (1982)), New Jersey courts have made clear that equitable considerations may override rigid statutory limitations when enforcement of those limitations would be unjust, particularly where no overriding public harm results from sustaining the prior approval.

Accordingly, the Municipality should be equitably estopped from rescinding or invalidating the prior zoning determination. In the event that the Municipality refuses to uphold its previously provided approval, my client is prepared to make application to the court for equitable relief that acknowledges his good-faith reliance and mitigates the resulting hardship, especially given this extended delay in raising the alleged ultra vires issue.

Fire Code Violations

On or about March 19, 2025, Fire Official Matthew Gifford remitted a notice regarding alleged violations of the NJ Fire Code and imminent hazards present on the Subject Property. **Exhibit B.** This notice demanded the immediate closure of my client's business by 18:00 on the same date said notice was remitted, March 19, 2025, with said demand continuing until the alleged violations and imminent hazards were remediated and abated. In good faith, my client complied with this demand. The Subject Property was inspected on March 19, 2025, by Connor McCann, noting the following issues on initial inspection: (1) Corridor between rooms does not meet means of egress standards due to its supplemental uses, code 1031.2; (2) Exit discharge is not continuous due to the ability to have to exit through another assembly space, code 1022.1; and (3) Insufficient number of exits for the posted occupancy load, code 1031.1.2.

However, Mr. McCann previously inspected the subject property on at least two separate occasions, once on or about January 16, 2025, and again on February 13, 2025. On neither of these inspections did Mr. McCann take any issue with the use of the hallway for egress because of an adjacent bathroom. However, on March 19, 2025, despite no changes whatsoever to Palmetto Venues, this layout suddenly became an issue.

This issuance of new fire code violations concerning the use of a hallway for egress and exit—adjacent to a bathroom—is improper and should be reversed or withdrawn, as it is inconsistent with the Municipality's prior official inspections, and there has been no change in the physical condition, use, or layout of the Subject Property. See **Exhibit C** (via email only) architectural plan of Palmetto Venues which was approved in 2023.

Palmetto Venues was previously inspected and approved by Mr. McCann on multiple occasions, without any citation or finding of noncompliance regarding the hallway or exits in question. These inspections included the same egress configuration and hallway use that now, inexplicably, is being deemed noncompliant. My client, once again, relied in good faith on these prior official inspections to maintain and operate the premises in accordance with all applicable codes.

The issuance of fire code violations under these circumstances constitutes an arbitrary and capricious enforcement action, particularly where: (1) No physical modifications have been made to the hallway, bathroom, or adjacent areas; (2) The use of the hallway as part of an egress path has been consistent since occupancy; (3) The property passed prior fire safety inspections under materially identical conditions; and (4) My client received no notice of any pending change in interpretation or enforcement posture by the fire marshal or municipal code officials.

The sudden reversal of position, without new facts or changed circumstances, violates the principles of administrative consistency and fair notice. While code enforcement authorities are entrusted with safeguarding public safety, their powers are constrained by constitutional and administrative law principles, which prohibit shifting standards or retroactive enforcement without justification. See In re Application of Holy Name Hosp., 301 N.J. Super. 282 (App. Div. 1997):

Agencies may not arbitrarily depart from established interpretations without a reasoned explanation or change in the law.

Furthermore, to the extent the new enforcement position results from an interpretive shift, my client, as well as the property owner, was entitled to prior notice and an opportunity to conform, especially where the Municipality's own prior conduct implied approval of the configuration.

For these reasons, the cited fire code violations should be dismissed or administratively withdrawn, or in the alternative, waived pending further review or appeal. My client remains willing to cooperate with code officials to ensure continued compliance, but respectfully requests that the inconsistent and retroactive application of code provisions be remedied.

Signage

On or about March 19, 2025, my client also received a notice demanding the removal of a wall mounted sign and surrounding ivy on the rear of the Subject Property. **Exhibit D.** Once again, my client complied with this demand in good faith and removed said sign and ivy. On or about April 1, 2024, my client obtained a permit for signage under Permit #2024-163. **Exhibit E.** Description of this approved signage is attached as **Exhibit F** (email only). Nonetheless, per direction of the aforementioned notice, a Commercial Zoning application for signage is in the process of being prepared, and a request for allowance of the noted "ivy expansion" will be included in my client's variance application, which shall arrive under separate cover.

Garbage

On or about March 19, 2025, my client also received a notice alleging that the Municipality has received numerous complaints from residents and the Verona Police regarding a garbage issue at the Subject Property. **Exhibit G.** Aside from listing various alleged complaints "over the past year" regarding placement of garbage and receptacle storage, said notice states: "This is the last warning letter regarding the garbage issue...A summons will be issued immediately after the next infraction which carries a mandatory court appearance and possible \$2000 fine." To the best of my client's knowledge and recollection, this was the first and only notice of any of the alleged complaints regarding garbage on the premises in the year and a half he has operated this business.

HVAC

On or about March 19, 2025, my client also received notice that two HVAC mini-split condenser units were installed without the required construction permits. **Exhibit H.** This notice demands that the HVAC system, that is part of the installed units, not be used until the construction permits are reviewed, paid for, the units are fully inspected, and final approval is issued. My client has complied with this demand in good faith and is in the process of brokering remediation of this issue. Upon information and belief, the property owner hired Air Quality HVAC LLC located at 20 Broad Street, Bloomfield, NJ 07003, phone number (973) 768-1326, for installation of the two HVAC units. Upon available information, the required permits were not obtained by the company. Concurrently with remission of this correspondence, Air Quality is being notified that said permits must be obtained.

Window Ordinance

On or about March 19, 2025, my client also received notice of an alleged violation of Verona Code Chapter 133-12. **Exhibit I.** Upon review of said ordinance, which reads in pertinent part: "All premises in which alcoholic beverages are sold or dispensed, excepting guest rooms and private dining rooms in hotels, shall be so arranged that a full view of the interior may be had from the public thoroughfare or from adjacent rooms to which the public is freely admitted." It is respectfully submitted that this particular ordinance is inapplicable to my client's business, as Palmetto Venues does not sell nor dispense alcoholic beverages. To the extent that any customers are permitted to bring and serve their own alcoholic beverages, said circumstances should be deemed an exception.

Despite the foregoing issues, my client wishes to continue the operation of Palmetto Venues undisturbed and harmoniously with the Municipality. In light of this desire, my client remains open to discussion and amicable resolution of the above issues.

Kindly provide the undersigned with all further information as deemed necessary by the Municipality for completion of the appeal/application processes, as well as hearing scheduling. Please do not hesitate to contact the undersigned for further discussion. Thanking you for your time and attention in this matter, I remain,

Very Truly Yours,

/s/ Nicholas J. Palma

Nicholas J. Palma, Esq.,

NJP/ad

Enc.

cc: Client

Kim Jhan, *Property Owner*

Kevin O'Sullivan, *Township Manager*

Brian J. Aloia, Esq., *Township Attorney*

Thomas Jacobsen, *Construction Official / Code Enforcement Officer*

Matthew Gifford, *Fire Marshall*

Law Offices of Nicholas J. Palma, P.C.

1425 Broad Street, Clifton, NJ

EXHIBIT

A

MAYOR
CHRISTOPHER H. TAMBURRO
DEPUTY MAYOR
JACK McEVOY
COUNCILMEMBERS
ALEX ROMAN
CHRISTINE McGRATH
CYNTHIA L. M. HOLLAND

TOWNSHIP OF VERONA
COUNTY OF ESSEX, NEW JERSEY



TOWNSHIP MANAGER
JOSEPH O. D'ARCO
TOWNSHIP CLERK
JENNIFER KIERMAN
TOWNSHIP ATTORNEY
BRIAN J. ALOIA, ESQ.

VERONA COMMUNITY CENTER
880 BLOOMFIELD AVENUE
VERONA, NEW JERSEY 07044

MUNICIPAL BUILDING
600 BLOOMFIELD AVENUE
VERONA, NEW JERSEY 07044

(973) 239-3220
WWW.VERONANJ.ORG

DEPARTMENT OF PUBLIC WORKS
10 COMMERCE COURT
VERONA, NEW JERSEY 07044

August 10, 2023
Township of Verona Zoning Dept.
10 Commerce Court
Verona, NJ 07044

Re: Zoning Permit # 2023-139
Applicant/Owner: Mr. Louis
Property: 546 Bloomfield Ave aka 10 Park Pl
Block 1703 Lot 68

Zoning Request:

Based upon the zoning permit application and the sketch submitted we understand that the owner is seeking approval from the zoning department to lease and operate an event space, named Palm Royale. No other requests have been requested or shown and therefore have not been considered in this departments review.

Zoning Requirement:

150-17.14 TC is in compliance as an event space is permitted in this zone.

Tenant states that no sign is being erected nor, a change in floor plan at this time. Sign permit will be applied for separately. Existing parking is being maintained in place of the current existing tenants of same use.

Zoning Decision:

The proposed request for has been **APPROVED** by this office. Please contact the Township of Verona Building Department to obtain a building permit and schedule inspections.

- No electrical, plumbing or building codes were reviewed as part of this application. Please coordinate with the Township of Verona Construction/Building Department for any required permits and or inspections which may be required.
- Any change or deviations from the plans which were provided and reviewed as part of this zoning permit at this location must first be approved by the Zoning Official or Zoning Administrator prior to obtaining a construction permit. The owner/applicant should be aware that any future change may require formal application to the Verona Board of Adjustment for variance governed by the rules and conditions pursuant to N.J.S.A. 40:55D-70d
- All zoning permits expire in one (1) year from the date of the approval.
- The Township has a Tree Removal, Maintenance and Protection Ordinance which must be followed if any trees will be impacted by the project. Every effort shall be made to preserve the maximum number of trees and other existing vegetation on the site. Inform this office if any trees are being removed.

Please feel free to contact this office should you have any questions,
Respectfully Submitted,

Phillip Epps

Phillip Epps
Zoning Official

Law Offices of Nicholas J. Palma, P.C.

1425 Broad Street, Clifton, NJ

EXHIBIT

B



MAYOR
CHRISTOPHER H. TAMBURRO
DEPUTY MAYOR
JACK MCEVOY
COUNCILMEMBERS
ALEX ROMAN
CHRISTINE MCGRATH
CYNTHIA L.M. HOLLAND

VERONA COMMUNITY CENTER
880 BLOOMFIELD AVENUE
VERONA, NEW JERSEY 07044

TOWNSHIP OF VERONA
COUNTY OF ESSEX, NEW JERSEY



MUNICIPAL BUILDING
600 BLOOMFIELD AVENUE
VERONA, NEW JERSEY 07044
(973) 239-3220
WWW.VERONANJ.ORG

TOWNSHIP MANAGER
KEVIN O'SULLIVAN
TOWNSHIP CLERK
JENNIFER KIERNAN
TOWNSHIP ATTORNEY
BRIAN J. ALOIA, ESQ.

DEPARTMENT OF PUBLIC WORKS
10 COMMERCE COURT
VERONA, NEW JERSEY 07044

To: Robert Louis
Palmetto Venues
49 West Mount Pleasant Avenue
Livingston, NJ 07039

March 19th, 2025

From: Matthew Gifford
Fire Official
Verona Fire Prevention Bureau
880 Bloomfield Avenue
Verona, NJ 07044

Re: Fire Code Violations and imminent hazards at the Palmetto Venues located at 546 Bloomfield Avenue, Verona, NJ 07044.

Dear Mr. Louis,

Please let this letter serve as a written notification of all current NJ Fire Code violations and imminent hazards. This letter will outline what is expected of you going forward to abate these violations and to ensure no other violations occur.

As a result of our fire inspection of the business on 1/16/2025, it was determined that the following violation remains:

N.J.A.C. 5-70-3,1010.6

On 3/19/2025, upon our receipt and review of the architectural drawings of the business, it has been determined that the following violations also exist:

N.J.A.C 5-70-3,1031.2

N.J.A.C 5-70-3,1022.1

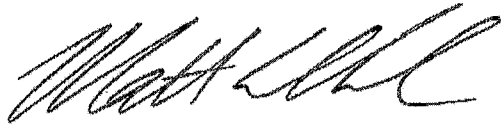
N.J.A.C 5-70-3,1031.1.2

Please be advised that all four of the above violations are **imminent hazards** and as a result of such, the premises is considered **unsafe** and is **unlawful for anyone to enter** until these violations are abated, except for the purpose of making the required repairs.

All notices of violations, fire code violations, notice of imminent hazard, and appeal rights are included with this letter.

The next step in abating these violations will be providing documentation by a licensed architect showing the proper means of egress requirements based upon the use and occupancy of the business.

Yours in fire safety,

A handwritten signature in black ink, appearing to read 'Matthew Gifford', written in a cursive style.

Matthew Gifford
Fire Official
Verona Fire Prevention Bureau
880 Bloomfield Avenue
Verona, NJ 07044
973-857-4761



Verona Township
Fire Prevention Bureau
880 Bloomfield Avenue
Verona, NJ 07044
Phone: (973)857-4761
Fax:

Notice of Violations and Order to Correct

Page 1 of 3

To: Palmetto Venues
546 Bloomfield Ave
Verona, NJ 07044

Date: 3/19/2025 Inspector: Connor McCann - 183907 Registration No: 0720-074875

(Name of Business, Structure, Premises) Palmetto Venues		
(Address) B: 1703 L: 68 - 546 Bloomfield Ave Verona NJ, 07044		
(Telephone Number)	LHU Code/Local Type Bc01-Recreation Center	(Use Group)

Owner	Agent	Tenant/Operator
Name) KWC & HZ CORP.	Horane Henry	Palmetto Venues
(Address) 699 BLOOMFIELD AVENUE		546 Bloomfield Ave
(City,State,Zip) MONTCLAIR NJ, 07042		Verona NJ, 07044
(Telephone)		(973) 609-3426

YOU ARE HEREBY NOTIFIED THAT an inspection of the above referenced property by the Fire Prevention Bureau disclosed violations of the Uniform Fire Code (N.J.A.C. 5:70-1 et seq.) promulgated pursuant to the New Jersey Uniform Fire Safety Act (N.J.S.A. 52:27D-192 et seq.). The violations are specified on the accompanying "violations" page(s).

YOU ARE HEREBY ORDERED by the Fire Official to correct the violations listed on the accompanying "violations" page(s) within the time, or by the date specified. If a reinspection discloses that violations have not been corrected and an extension of time has not been requested and granted, you will be subject to penalties of up to \$5000.00 per violation per day or as otherwise authorized by the Act and Department Regulations. IN ADDITION, the ACT imposes liability on the owner for the actual costs of fire suppression where a violation directly or indirectly results in a fire.

By Order Of Fire Official

By:

Verona Fire Official or Designee

I hereby acknowledge receipt of a copy of this NOTICE OF VIOLATIONS and ORDER TO CORRECT.

Signature

Printed Name

Title

Date

APPEAL RIGHTS-EXTENSIONS

5:71-3.7(b)3.
Version:24.3.32

>See final page for information concerning your administrative appeal rights<

Printed on 3/19/2025



Verona Township
Fire Prevention Bureau
880 Bloomfield Avenue
Verona, NJ 07044
Phone: (973)857-4761
Fax:

Fire Code Violations

Page 2 of Page 3

Registration No. 0720-074875

Date 3/19/2025

Inspector Connor McCann - 183907

Premises: Palmetto Venues
546 Bloomfield Ave
Verona NJ, 07044

Owner or Agent Palmetto Venues

- ☐ Maintenance
☐ Continuation Sheet
☐ Retrofit
☐ If box is checked, a New Jersey State Uniform Construction Code Permit is required.

Violations cited on the above premises are as follows:

NO.	Location	Nature & Description	Code Reference	Inspection Summary
1	Corridor between rooms	Corridor between room does not meet means of egress standards due to its supplemental uses.	1031.2	Abate by: 3/20/2025
				I-FPI-25-125(Connor McCann)3/19/2025
2	Exit Discharge	Exit discharge is not continuous due to the ability to have to exit through another assembly space	1022.1	Abate by: 3/20/2025
				I-FPI-25-125(Connor McCann)3/19/2025
3	Throughout	Insufficient number of exits for the posted occupancy load.	1031.1.2	Abate by: 3/20/2025
				I-FPI-25-125(Connor McCann)3/19/2025
4	Front egress to Bloomfield Ave	Front egress shall have an illuminated exit sign above the means of egress	1013.1	Abate by: 2/15/2025
				I-FPI-25-041(Connor McCann)1/16/2025
				A-FPI-25-048(Connor McCann)2/13/2025
5	Egress Doors Front and Rear - 3 total	Panic Hardware must be installed on egress doors that are exits for room exceeding the occupancy load specified in the UFC and/or IBC	1010.6	Abate by: 2/15/2025
				I-FPI-25-041(Connor McCann)1/16/2025
				U-FPI-25-048(Connor McCann)2/13/2025
				U-FPI-25-125(Connor McCann)3/19/2025

Inspection Summary Key:

I - Initial U - Violation Unabated A - Violation Abated R - Repeat Violation
Violation Status - Inspection Number (Inspector ID) Inspection Date

Note: The numbering of violation(s) is for identification purposes only and shall not be construed as bearing in anyway on the seriousness of any violation.

5:71-3.7(b)3.

N.J.A.C. 5:70-3, 2018 International Fire Code New Jersey Edition, which has been adopted by reference.

N.J.A.C. 5:70-4, Subchapter 4 Retrofit Requirements



Verona Township
Fire Prevention Bureau
880 Bloomfield Avenue
Verona, NJ 07044
Phone: (973)857-4761
Fax:

Administrative Appeal Rights

Page 3 of 3

The owner of the premises or of the use, or an authorized agent of the owner MAY CONTEST THIS ORDER at an Administrative Hearing. The request for a hearing must be in writing within 15 days after receipt of this order and addressed to:

**Essex County Board of Appeals
900 Bloomfield Avenue
Verona, NJ 07044**

In accordance with N.J.A.C. 5:70-2.19 an appeal shall be signed by a proper party and shall include:

- a) The date of the act that is subject to the appeal;
- b) The name and status of the person submitting the appeal;
- c) The specific violations or other act claimed to be in error; and
- d) A concise statement of the basis of the appeal.

You are advised that only matters deemed to be CONTESTED CASES, as defined by the Administrative Procedures Act, will be scheduled for a Hearing. If a Hearing is scheduled, you will be notified in advance of the time and place.

Extensions

If a specified time has been given to abate a violation, YOU MAY REQUEST AN EXTENSION OF TIME by submitting a written request to the FIRE PREVENTION BUREAU. To be considered, the request must be made before the compliance date specified and must set forth the work accomplished, the work remaining, the reason why an extension of time is necessary and the date by which all work must be completed.

TAKE NOTICE THAT, pursuant to N.J.A.C. 5:70-2.10(d)2, an application for an extension constitutes an admission that the violation notice is factually and procedurally correct and that the violations do or did exist. In addition, the request for an extension constitutes a waiver of the right to a Hearing as to those violations for which the extension is applied.

Penalties

Pursuant to N.J.A.C. 5:70-2.12, a violation of the code is punishable by monetary penalties of not more than \$5,000 per day for each violation. Each day a violation continues is an additional, separate violation except while an appeal is pending.

ALSO TAKE NOTICE THAT, pursuant to N.J.A.C. 5:70-2.12A, when an owner has been given notice of the existence of a violation and has not abated the violation, that owner shall, in addition to being liable to the penalty provided for by N.J.A.C. 5:70-2.12, be liable to a dedicated penalty in the like amount.

A violation that is recurring justifies imposition of an immediate penalty without the necessity for an interval in which corrections can be made. A violation shall be deemed to be a recurring violation if a notice has been served within two years from the date that a previous notice was served and the violation, premises and responsible party are substantially the same.

Claims arising out of penalty assessments can be compromised or settled if it shall be likely to result in compliance. Moreover, no such disposition can be finalized while the violation continues to exist.

Any penalties assessed are in addition to others previously assessed. Penalties must be paid in full within 30 days after an order to pay. If full payment is not made within 30 days, the local enforcing agency may institute a civil penalty action by a summary proceeding under the Penalty Enforcement Law (N.J.S.A. 2A:58-10 et seq.) in the Superior Court or Municipal Court.

Notice:

If you require guidance or advice concerning your legal rights, obligations or the course of action you should follow, consult your own advisor.



Verona Township
Fire Prevention Bureau
880 Bloomfield Avenue
Verona, NJ 07044
Phone: (973)857-4761
Fax:

Code Reference

Location 546 Bloomfield Ave

Inspection Number: FPI-25-125

Inspector: Connor McCann

Inspection Notes:

Statute Rule

Statute Text

1031.2

Required exit accesses, exits and exit discharges shall be continuously maintained free from obstructions or impediments to full instant use in the case of fire or other emergency where the building area served by the means of egress is occupied. An exit or exit passageway shall not be used for any purpose that interferes with a means of egress.

1022.1

An exit shall not be used for any purpose that interferes with its function as a means of egress. Once a given level of exit protection is achieved, such level of protection shall not be reduced until arrival at the exit discharge. Exits shall be continuous from the point of entry into the exit to the exit discharge.

1031.1.2

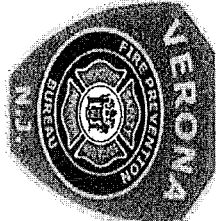
The capacity of exits serving a floor shall be sufficient for the occupant load thereof as determined by the construction code in effect at the time of first occupancy or N.J.A.C. 5:70-4 et seq., as applicable.

1013.1

All means of egress shall be indicated with approved "Exit" signs where required by the construction code in effect at the time of first occupancy or N.J.A.C. 5:70-4 et seq., as applicable. All "Exit" signs shall be maintained visible, and all illuminated exit signs shall be illuminated at all times the structure is occupied. Supplemental internally illuminated directional signs, when necessary, shall be installed in accordance with the technical requirements of the Uniform Construction Code indicating the direction and way of egress.

1010.6

All doors equipped with latching devices serving rooms or spaces with an assembly or educational occupancy with an occupant load greater than 100 shall have the approved panic hardware maintained in compliance with the construction code in effect at the time of first occupancy.



Verona Township
Fire Prevention Bureau
880 Bloomfield Avenue
Verona, NJ 07044
Phone: (973)857-4761
Fax:

Inspection Certificate

Registration Number: 0720-074875
LHU Code/Local Type: Bc01-Recreation Center

Premises:

Palmetto Venues
546 Bloomfield Ave
Verona, NJ 07044
Block: 1703 Lot: 68

Inspection Number: FPI-24-188
Inspector: Jared Koslow
Inspection Date: 4/15/2024

Take Notice:

This Certifies that the referenced property has been inspected pursuant to the Uniform Fire Safety Act and satisfies minimum requirements of the New Jersey Uniform Fire Code.

**This certificate Expires
April 30, 2025**

**This certificate must be posted in a
conspicuous location at the above premises.**

By:


Verona Fire Official or Designee

**This certificate does not take the place of other approvals, permits, or licenses required by law. It is
non-transferable, and any change in use or occupancy of these premises shall require a new certificate.**



Verona Township
Fire Prevention Bureau
880 Bloomfield Avenue
Verona, NJ 07044
Phone: (973)857-4761
Fax:

**MAXIMUM PERMITTED OCCUPANCY
OF THIS SPACE**
Royal Grove Room
**SHALL NOT EXCEED
PERSONS**

☐

Standing

64

Building Total Occupancy

☐

Chairs Only

☐

Table and
Chairs

THIS SIGN SHALL BE POSTED CONSPICUOUSLY NEAR THE MAIN
ENTRANCE IN ACCORDANCE WITH N.J.A.C. 5:70-3, 1003.4

A NOTICE OF VIOLATION OR PENALTIES SHALL BE ASSESSED IF THE MAXIMUM PERMITTED
OCCUPANCY PER N.J.A.C. 5:70-2.12(B)3. IS EXCEEDED

Registration Number: 0720-074875

Business: Palmetto Venues

Use Group:

Address: 546 Bloomfield Ave

Life Hazard Use:

Bc01-Recreation Center

5:71-3.7(a)14.

Verona Fire Official or Designee

Friday, March 22, 2024

Date

Version 24.1.19



Verona Township
Fire Prevention Bureau
880 Bloomfield Avenue
Verona, NJ 07044
Phone: (973)857-4761
Fax:

**MAXIMUM PERMITTED OCCUPANCY
OF THIS SPACE
Palm Royale Room
SHALL NOT EXCEED
PERSONS**

☐

☐ Standing

151

Building Total Occupancy

☐

☐ Chairs Only

☐

☐ Table and
Chairs

THIS SIGN SHALL BE POSTED CONSPICUOUSLY NEAR THE MAIN
ENTRANCE IN ACCORDANCE WITH N.J.A.C. 5:70-3, 1003.4

A NOTICE OF VIOLATION OR PENALTIES SHALL BE ASSESSED IF THE MAXIMUM PERMITTED
OCCUPANCY PER N.J.A.C. 5:70-2.12(B)3. IS EXCEEDED

Registration Number: 0720-074875

Business: Palmetto Venues

Use Group:

Address: 546 Bloomfield Ave

Life Hazard Use:

Bc01-Recreation Center

5:71-3.7(a)14.

[Signature]
Verona Fire Official or Designee

Friday, March 22, 2024

Date

Version 24.1.19

Law Offices of Nicholas J. Palma, P.C.

1425 Broad Street, Clifton, NJ

ARCHITECTURAL PLAN OF PALMETTO VENUES (via eMail only)

EXHIBIT

C

Law Offices of Nicholas J. Palma, P.C.

1425 Broad Street, Clifton, NJ

EXHIBIT

D

TOWNSHIP OF VERONA
COUNTY OF ESSEX, NEW JERSEY

TOWNSHIP MANAGER
KEVIN O'SULLIVAN
TOWNSHIP CLERK
JENNIFER KIERNAN



DEPUTY MANAGER
OPEN
TOWNSHIP ATTORNEY
BRIAN J. ALOIA, ESQ.

VERONA COMMUNITY CENTER
880 BLOOMFIELD AVENUE
VERONA, NEW JERSEY 07044

MUNICIPAL BUILDING
600 BLOOMFIELD AVENUE
VERONA, NEW JERSEY 07044
(973) 239-3220
WWW.VERONANJ.ORG

DEPARTMENT OF PUBLIC WORKS
10 COMMERCE COURT
VERONA, NEW JERSEY 07044

Zoning Office 880 Bloomfield Avenue, Verona, NJ 07044 973-857-4772

March 19, 2025 Sent via Email, Regular Mail, Certified RRR

SIGNAGE - CODE VIOLATION AT 546 BLOOMFIELD AVENUE, VERONA, NJ

Tenant: Palmetto Venues
Robert Louis
49 West Mount Pleasant Avenue
#199
Livingston, NJ 07039

Owner: KWC & HJZ, Corp.
Kim Jhan
599 Bloomfield Avenue
Montclair, NJ 07042

Property: 546 Bloomfield Avenue aka 10 Park Place; Block 1703, Lot 68

Re: Signage

Mr. Louis -

Your establishment was granted approval for signs under Zoning Permit 2024-037 and a revised request under Zoning Permit #2024-169. The following were approved:

- new wall mounted, non-illuminated building sign 24" x 72" mounted over the entrance to the front of business;
- front door and front window vinyl graphics;
- change out of panel in existing illuminated sign in the rear of the building;
- vinyl lettering on the rear door.

There is an additional wall mounted sign on the rear of the building (photo attached) and green ivy surrounding the side entrance sign which would constitute an extension of that signage.

Please remove such signage within 14 days of the date of this letter.

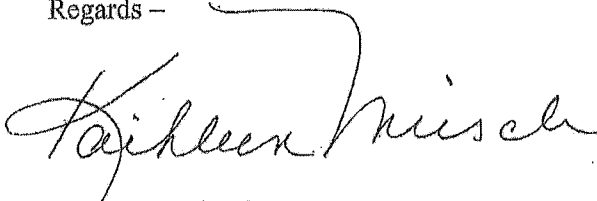
SIGNAGE - CODE VIOLATION AT 546 BLOOMFIELD AVENUE, VERONA, NJ

If you wish to apply for the additional signage, please complete and submit a Commercial Zoning application for signage. Please note that the ivy expansion of the side entrance will require a variance.

Per the Township of Verona Ordinance, Article II § 1-11 A. Maximum penalty. For violation of any provisions of this chapter, any other chapter of this Code or any other ordinance of the Township, the maximum penalty, upon conviction, shall be one or more of the following: imprisonment in the county jail or in any place provided by the municipality for the detention of prisoners, for any term not exceeding 90 days; or by a fine not exceeding \$2,000; or by a period of community service not exceeding 90 days.

Please contact me directly with any questions.

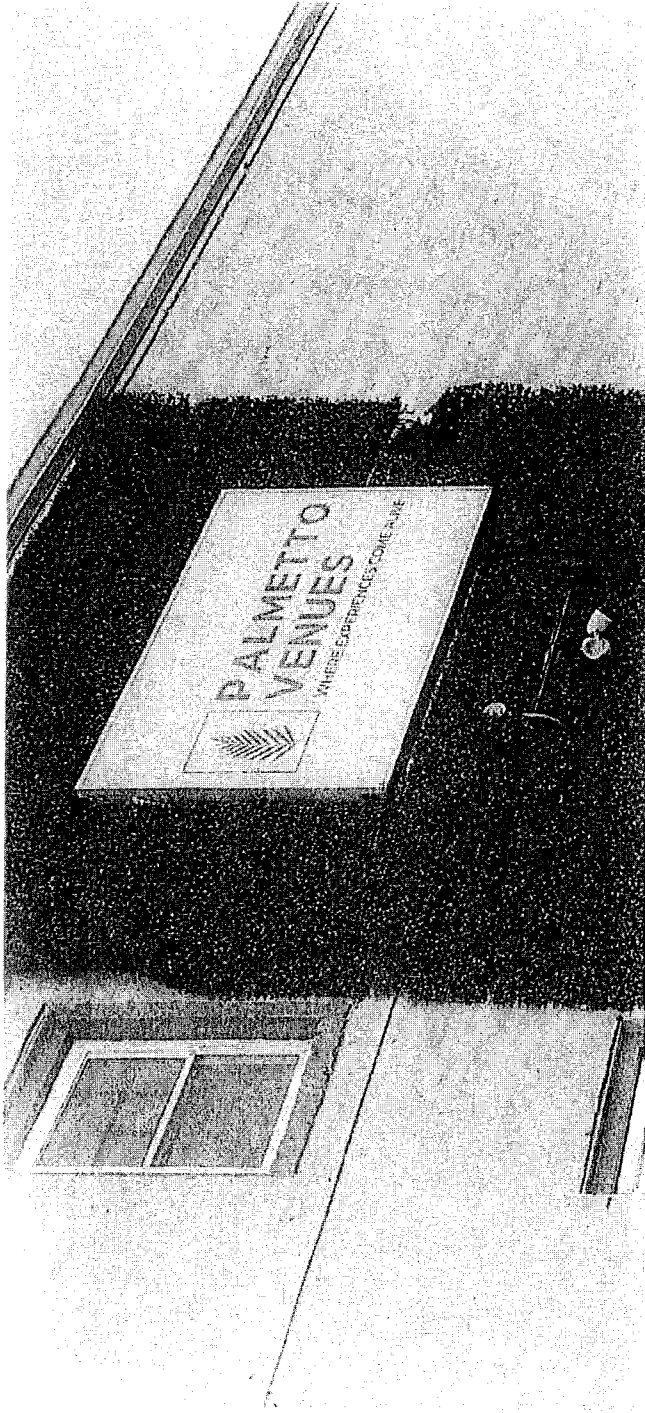
Regards –

A handwritten signature in cursive script, reading "Kathleen Miesch". The signature is written in dark ink and is positioned above the printed name and contact information.

Kathleen Miesch
Zoning Official
kmiesch@VeronaNJ.org

cc: Kevin O'Sullivan, Township Manager – EMAIL ONLY
Tom Jacobsen, C. P. M., Construction Official – EMAIL ONLY
Kim Jhan – Email, Regular & Certified Mail





Law Offices of Nicholas J. Palma, P.C.

1425 Broad Street, Clifton, NJ

EXHIBIT

E

UNIFORM CONSTRUCTION CODE
UNIFORM CONSTRUCTION CODE
UNIFORM CONSTRUCTION CODE



Date Issued
Control #
Permit #

4/1/24
2024-1163

CONSTRUCTION PERMIT NOTICE

Block 1703 Lot 68 Qualification Code
Work Site Location: 546 Bloomfield Verona

AUTHORIZED FOR:

☒ BUILDING

☐ ELECTRICAL

☐ PLUMBING

☐ FIRE PROTECTION

☐ ELEVATOR DEVICES

☐ DEMOLITION

☐ MECHANICAL

☐ OTHER

Description of Work:

Sign

This notice shall be posted conspicuously at the work site and shall remain so until issuance of a certificate.

U.C.C. F180
(rev 3/03)

Reorder at: ucc.allegramannara.com • (800) 390-1400 • Allegra Marketing, Print & Mail • Manalapan, NJ

Law Offices of Nicholas J. Palma, P.C.

1425 Broad Street, Clifton, NJ

PALMETTO VENUES APPROVED SIGNAGE (via eMail only)

EXHIBIT

F

Law Offices of Nicholas J. Palma, P.C.
1425 Broad Street, Clifton, NJ

EXHIBIT

G



MAYOR
CHRISTOPHER H. TAMBURRO
DEPUTY MAYOR
JACK McEVOY
COUNCIL MEMBERS
ALEX ROMAN
CHRISTINE McGRATH
CYNTHIA L. M. HOLLAND

TOWNSHIP OF VERONA
COUNTY OF ESSEX, NEW JERSEY



TOWNSHIP MANAGER
KEVIN O'SULLIVAN
TOWNSHIP CLERK
JENNIFER KIERNAN
TOWNSHIP ATTORNEY
BRIAN J. ALOIA, ESQ.

VERONA COMMUNITY CENTER
880 BLOOMFIELD AVENUE
VERONA, NEW JERSEY 07044

MUNICIPAL BUILDING
600 BLOOMFIELD AVENUE
VERONA, NEW JERSEY 07044
(973) 239-3220
WWW.VERONANJ.ORG

DEPARTMENT OF PUBLIC WORKS
10 COMMERCE COURT
VERONA, NEW JERSEY 07044

Construction Code Office 880 Bloomfield Avenue, Verona, NJ 07044 973-857-4834 (f)973-857-5134

March 19, 2025

TO: KWC & HZ Corp
599 Bloomfield Avenue
Montclair, N. J. 08812

Robert Louis/Owner-Palmetto Venues
29 West Mount Pleasant Avenue
#199
Livingston, N. J. 07039

FROM: Thomas Jacobsen, C. P. M.
Construction Official/Code Enforcement Officer
Township of Verona, N. J. 07044

RE: CODE VIOLATIONS AT 546 BLOOMFIELD AVENUE, VERONA, N. J.

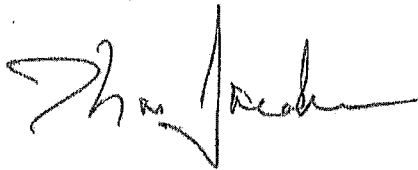
Gentlemen—

Over the past year there have been numerous complaints from residents and the Verona Police regarding the garbage issue. These complaints are, but not limited to:

1. Placement of garbage at the curb on Park Street on the wrong days.
2. Bags of garbage are not properly secured in the garbage cans with secured lids, allowing animals to access the garbage bags resulting in refuse dragged throughout the neighborhood.
3. Wind has played a factor with garbage cans placed out on the curb without the lids properly secured, scattering garbage throughout the neighborhood.
4. Garbage cans not being moved promptly back to the building after they are emptied. As a result the wind blows the cans into Park Street and creates a safety hazard for vehicles and pedestrians.

This is the last warning letter regarding the garbage issue. There will be no more warning phone calls. A summons will be issued immediately after the next infraction which carries a mandatory court appearance and possible \$2000 fine. If the violation continues a separate summons can be issued each day. Please be guided accordingly.

Regards-

A handwritten signature in black ink, appearing to read 'Thomas Jacobsen', with a stylized, cursive script.

Thomas Jacobsen, C. P. M.
Construction Official/Code Enforcement Officer
Township of Verona, N. J.
Office: 973-857-4834
Email: tjacobsen@veronanj.org

CC: Kevin O'Sullivan, Township Manager
Matt Gifford, Township Fire Marshal
Kathleen Miesch, Township Zoning Official

Law Offices of Nicholas J. Palma, P.C.

1425 Broad Street, Clifton, NJ

EXHIBIT

H

TOWNSHIP OF VERONA
COUNTY OF ESSEX, NEW JERSEY

TOWNSHIP MANAGER
KEVIN O'SULLIVAN
TOWNSHIP CLERK
JENNIFER KIERNAN



DEPUTY MANAGER
OPEN
TOWNSHIP ATTORNEY
BRIAN J. ALOIA, ESQ.

VERONA COMMUNITY CENTER
880 BLOOMFIELD AVENUE
VERONA, NEW JERSEY 07044

MUNICIPAL BUILDING
600 BLOOMFIELD AVENUE
VERONA, NEW JERSEY 07044
(973) 239-3220
WWW.VERONANJ.ORG

DEPARTMENT OF PUBLIC WORKS
10 COMMERCE COURT
VERONA, NEW JERSEY 07044

Zoning Office 880 Bloomfield Avenue, Verona, NJ 07044 973-857-4772

March 19, 2025 Sent via Email, Regular Mail, Certified RRR

CODE VIOLATION AT 546 BLOOMFIELD AVENUE, VERONA, NJ

Owner: KWC & HZ Corp.
 Kim Jhan
 599 Bloomfield Avenue
 Montclair, Nj 08812

Tenant: Palmetto Venues
 Robert Louis
 49 West Mount Pleasant Avenue
 #199
 Livingston, NJ 07039

Property: 546 Bloomfield Avenue aka 10 Park Place; Block 1703, Lot 68

Re: Mini-split Units on side of Building – No Zoning or Building Permits

Gentlemen –

It has come to our attention that two (2) mini-split units that were installed on the side of the building at the above listed address (photo attached). The units appear to be serving the Palmetto Venues event space.

Upon reviewing both the Zoning files and the Construction Department files, no approvals or permits were found. Therefor it is determined that the units were installed without the required Zoning approval and construction permits.

Please submit the following within 14 days of the date of this letter:

- Zoning:
 - The name and contact information of the company that performed the installation of the mini-split units in questions;
 - Zoning Permit Application (attached) and **all required documents** as listed in the check-list of the application inclusive of a current condition survey.

CODE VIOLATION AT 546 BLOOMFIELD AVENUE, VERONA, NJ

Once you receive approval of the Zoning Department, the following must be submitted:

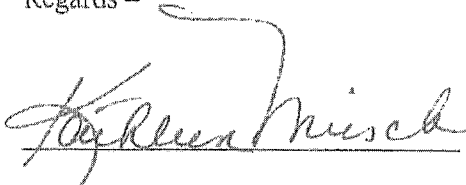
- **Building:** Department will require the following be submitted:
 - Construction permit inclusive of the following:
 - Building technical sheet;
 - Electrical technical sheet;
 - Plumbing technical sheet

The State of New Jersey Uniform Construction Code states a monetary fine can be issued for performing work without the required permits.

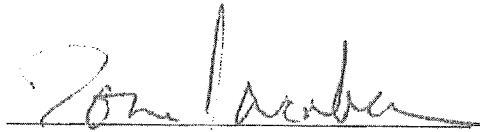
Per the Township of Verona Ordinance, Article II § 1-11 A. Maximum penalty. For violation of any provisions of this chapter, any other chapter of this Code or any other ordinance of the Township, the maximum penalty, upon conviction, shall be one or more of the following: imprisonment in the county jail or in any place provided by the municipality for the detention of prisoners, for any term not exceeding 90 days; or by a fine not exceeding \$2,000; or by a period of community service not exceeding 90 days.

Please contact me directly with any questions.

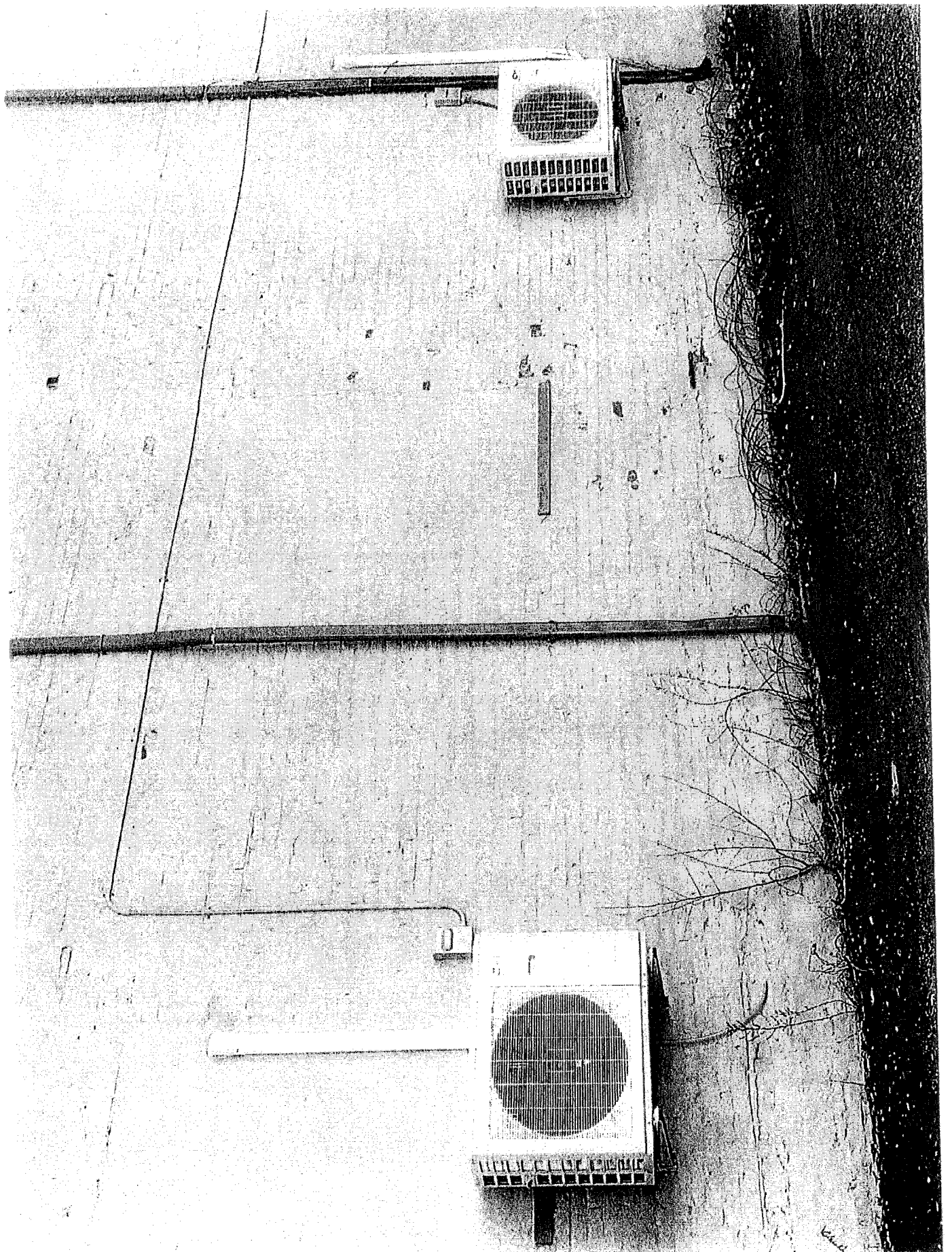
Regards --



Kathleen Miesch
Zoning Official
kmiesch@VeronaNJ.org



Tom Jacobsen, C. P. M.
Construction Official/Code Enforcement Officer
Office: 973-857-4834
Email: tjacobsen@veronanj.org



ALYOR
CHRISTOPHER H. TAMBURRO
DEPUTY MAYOR
JACK McEVoy
COUNCIL MEMBERS
ALEX ROMAN
CHRISTINE McGRATH
CYNTHIA L. M. HOLLAND

TOWNSHIP OF VERONA
COUNTY OF ESSEX, NEW JERSEY



TOWNSHIP MANAGER
KEVIN O'SULLIVAN
TOWNSHIP CLERK
JENNIFER KIERNAN
TOWNSHIP ATTORNEY
BRIAN J. ALOIA, ESQ.

VERONA COMMUNITY CENTER
880 BLOOMFIELD AVENUE
VERONA, NEW JERSEY 07044

MUNICIPAL BUILDING
600 BLOOMFIELD AVENUE
VERONA, NEW JERSEY 07044

DEPARTMENT OF PUBLIC WORKS
10 COMMERCE COURT
VERONA, NEW JERSEY 07044

(973) 239-3220
WWW.VERONANJ.ORG

Construction Code Office 880 Bloomfield Avenue, Verona, NJ 07044 973-857-4834 (f) 973-857-5134

March 19, 2025

TO: KWC & HZ Corp
599 Bloomfield Avenue
Montclair, N. J. 08812

Robert Louis/Owner-Palmetto Venues
29 West Mount Pleasant Avenue
#199
Livingston, N. J. 07039

FROM: Thomas Jacobsen, C. P. M.
Construction Official/Code Enforcement Officer
Township of Verona, N. J. 07044

RE: CODE VIOLATIONS AT 546 BLOOMFIELD AVENUE, VERONA, N.J.

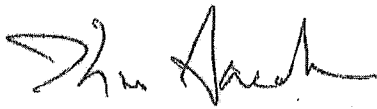
Dear Property Owner:

It has come to my attention that two new HVAC mini-split condenser units have been installed on the exterior of the building facing the parking lot at 546 Bloomfield Avenue. The units were installed without the required construction permits that includes a building technical sheet, electrical technical sheet, and a plumbing technical sheet.

You must immediately submit to the Building Department all contact information from the HVAC Company that installed the HVAC units. The State of New Jersey Uniform Construction Code states a monetary fine can be issued for performing work without the required permits.

In the meantime, the HVAC system that is part of the new condenser units **CANNOT** be used until the construction permits are reviewed, paid for, the units are fully inspected and a final approval is issued. Please respond within two weeks upon receipt of this letter.

Regards-

A handwritten signature in black ink, appearing to read 'Tom Jacobsen', with a stylized, cursive script.

Thomas Jacobsen, C. P. M.
Construction Official/Code Enforcement Officer
Township of Verona, N. J.
Office: 973-857-4834
Email: tjacobsen@veronanj.org

CC: Kevin O'Sullivan, Township Manager
Matt Gifford, Township Fire Marshal
Kathleen Miesch, Township Zoning Official

Law Offices of Nicholas J. Palma, P.C.

1425 Broad Street, Clifton, NJ

EXHIBIT

I

MAYOR
CHRISTOPHER H. TAMBURRO
DEPUTY MAYOR
JACK McEVoy
COUNCIL MEMBERS
ALEX ROMAN
CHRISTINE McGRATH
CYNTHIA L. M. HOLLAND

TOWNSHIP OF VERONA
COUNTY OF ESSEX, NEW JERSEY



TOWNSHIP MANAGER
KEVIN O'SULLIVAN
TOWNSHIP CLERK
JENNIFER KIERNAN
TOWNSHIP ATTORNEY
BRIAN J. ALOLA, ESQ.

VERONA COMMUNITY CENTER
880 BLOOMFIELD AVENUE
VERONA, NEW JERSEY 07044

MUNICIPAL BUILDING
600 BLOOMFIELD AVENUE
VERONA, NEW JERSEY 07044
(973) 239-3220
www.VERONANJ.ORG

DEPARTMENT OF PUBLIC WORKS
10 COMMERCE COURT
VERONA, NEW JERSEY 07044

Construction Code Office 880 Bloomfield Avenue, Verona, NJ 07044 973-857-4834 (f)973-857-5134

March 19, 2025

TO: Robert Louis/Owner-Palmetto Venues
29 West Mount Pleasant Avenue
#199
Livingston, N. J. 07039

FROM: Thomas Jacobsen, C. P. M.
Construction Official/Code Enforcement Officer
Township of Verona, N. J. 07044

RE: CODE VIOLATIONS AT 546 BLOOMFIELD AVENUE, VERONA, N. J.

Dear Mr. Louis:

It has come to my attention the front store windows facing Bloomfield Avenue are blacked out and unable to see the inside of the building from Bloomfield Avenue. Attached is the Verona Code Chapter 133-12 "View of Interior required"

Please read the ordinance, compliance is expected within two weeks of the date of this letter. Upon completion, please call the office for a follow-up site inspection.

Regards-

Thomas Jacobsen, C. P. M.
Construction Official/Code Enforcement Officer
Township of Verona, N. J.
Office: 973-857-4834
Email: tjacobsen@veronanj.org
CC: Kevin O'Sullivan, Township Manager
Matt Gifford, Township Fire Marshal
Kathleen Miesch, Township Zoning Official

*Township of Verona, NJ
Wednesday, March 19, 2025*

Chapter 133. Alcoholic Beverages

§ 133-12. View of interior required.

All premises in which alcoholic beverages are sold or dispensed, excepting guest rooms and private dining rooms in hotels, shall be so arranged that a full view of the interior may be had from the public thoroughfare or from adjacent rooms to which the public is freely admitted. All such premises shall be lighted sufficiently so that a full view of the interior thereof may be had at all hours from the public thoroughfare or from adjacent rooms to which the public is freely admitted.