FAIRFAX CIRCUIT COURT
CIVIL CASE COVERSHEET 2019 06521

Parties:

Plaintiffs	Defendants
1. K2NC LLC	1. Board of Supervisors of Fairfax County, VA, et al.
2.	2.
3.	3.

***Plaintiff proceeding without Counsel – Address and Daytime Phone Number required on Complaint**

Plaintiff Attorney:

Name: Nicholas V. Albu Bar ID: 78229

Firm: Reed Smith LLP

Street: 7900 Tysons One Place, Suite 500

City: McLean State: VA Zip: 22102

Phone Number: 703-641-4327 Fax Number: 703-641-4340

E-mail Address: nalbu@reedsmith.com

FILED
CIVIL INTAKE
2019 MAY -8 PM 1:23
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

Nature of Complaint (Check only one) *** Cases in the Civil Tracking Program**

☐ Administrative Appeal	☐ Defamation *	☐ Malpractice – Medical *
☐ Affirmation of Marriage	☐ Delinquent Taxes *	☐ Mechanics/Vendors Lien *
☐ Aid & Guidance	☐ Eminent Domain	☐ Partition *
☐ Appeal Decision of Board of Zoning	☐ Encumber/Sell Real Estate	☐ Personal Injury – Assault *
☐ Appeal of Process/Judicial Appeal	☐ Erroneous Assessments	☐ Personal Injury – Auto *
☐ Appointment Church/Organization Trustees	☐ Expungement	☐ Personal Injury – Emotional *
☐ Arbitration	☐ False Arrest/Imprisonment*	☐ Personal Injury – Premises Liability*
☐ Attachment	☐ Fiduciary/Estate Complaint	☐ Property Damage*
☐ Complaint – Equity *	☐ Garnishment–Federal–180 days	☐ Products Liability*
☐ Complaint – Legal Cause of Action *	☐ Garnishment–Wage–180 days	☐ Quiet Title *
☐ Compromise Settlement	☐ Garnishment–Other – 90 days	☐ Real Estate *
☐ Condemnation*	☐ Guardian/Conservator Adult	☐ Restoration of Driving Privilege
☐ Confession of Judgment	☐ Guardianship/Minor	☐ Vital Record Correction
☐ Construction *	☐ Injunction	☐ Writ Habeas Corpus
☐ Contract *	☐ Interpleader	☐ Writ Mandamus
☐ Conversion*	☐ Insurance *	☐ Wrongful Death*
☐ Court Satisfaction of Judgment	☐ Judicial Review	☐ Wrongful Discharge *
☐ Declare Death	☐ Malicious Prosecution *	☐ **OTHER:**
☑ Declaratory Judgment *	☐ Malpractice – Legal *	

Damages in the amount of $ 1,200,000.00 **are claimed.**

Requested Service: Sheriff ☐ Private Process Server ☑ DMV ☐ Secretary of Commonwealth ☐
State Corporation Commission ☐ Publication ☐ No Service at this time ☐

VIRGINIA

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

K2NC LLC

Plaintiff,

v.

Case No. 2019-06521

BOARD OF SUPERVISORS OF FAIRFAX COUNTY, VIRGINIA,
Serve: Elizabeth D. Teare
County Attorney
12000 Government Center Parkway
Suite 549
Fairfax County, VA 22035

and

EXCEPTION REVIEW COMMITTEE,
Serve: Elizabeth D. Teare
County Attorney
12000 Government Center Parkway
Suite 549
Fairfax County, VA 22035

and

CHRIS KOERNER, in his capacity as a member of the Exception Review Committee,
Serve: Chris Koerner
3273 Fox Mill Road
Oakton, VA 22124

and

AMY GOULD, in her capacity as a member of the Exception Review Committee,
Serve: Amy Gould
7718 Lafayette Forest Drive
Unit 32
Annandale, VA 22003

and

ANNE S. KANTER, in her capacity as a member of the Exception Review Committee,
Serve: Anne S. Kanter
6657 Madison McLean Drive
McLean, VA 22101

and

JAMES C. CHESLEY, in his capacity as a member of the Exception Review Committee,
Serve: James C. Chesley
7207 Main Street
Clifton, VA 20124

and

EDWARD W. MONROE, JR., in his capacity as a member of the Exception Review Committee,
Serve: Edward W. Monroe, Jr.
7710 Davis Court
McLean, VA 22101

and

KEN LANFEAR, in his capacity as a member of the Exception Review Committee,
Serve: Ken Lanfear
11776 Stratford House Place
Unit 1003
Reston, VA 20190

and

ELIZABETH MARTIN, in her capacity as a member of the Exception Review Committee,
Serve: Elizabeth Martin
10280 Colony Park Drive
Fairfax, VA 22032

and

SUE KOVACH SHUMAN, in her capacity as a member of the Exception Review Committee,
Serve: Sue Kovach Shuman
9202 Saint Marks Place
Fairfax, VA 22031

and

MONICA BILLGER, in her capacity as a member of the Exception Review Committee,
Serve: Monica Billger
7636 Kingsbury Road
Alexandria, VA 22315

and

DAVID W. SCHNARE, in his capacity as a member of the Exception Review Committee.
Serve: David W. Schnare
9033 Brook Ford Road
Burke, VA 22015

Defendants.

COMPLAINT FOR DECLARATORY AND OTHER RELIEF

COMES NOW, K2NC LLC, by counsel, pursuant to Virginia Code § 8.01-184 *et seq.*, and files this Complaint for Declaratory and Other Relief against the Board of Supervisors of Fairfax County, Virginia, the Exception Review Committee, Chris Koerner, Amy Gould, Ann S. Kanter, James C. Chesley, Edward W. Monroe, Jr., Ken Lanfear, Elizabeth Martin, Sue Kovach Shuman, Monica Billger and David W. Schnare (in their capacity as members of the Exception Review Committee) and states as follows:

Parties

1. K2NC LLC ("K2NC") is a limited liability company organized under the laws of the Commonwealth of Virginia. K2NC is the owner of the real property that is the subject of this

action, which is located at 4104 Woodlark Drive and is identified as Tax Map No. 0594 ((10)) 0042 (the "Property").

2. The Board of Supervisors of Fairfax County, Virginia (the "Board") is the duly elected governing body of Fairfax County, Virginia, and it is the governing entity that exercises planning and zoning authority for the County. The Board has the authority to hear appeals of decisions rendered by the Exception Review Committee.

3. The Exception Review Committee (the "ERC") is a body appointed by the Board to review applications to conduct land disturbing activities within the Resource Protection Area and to administer the provisions of Article 6 (Exceptions) of Chapter 118 of the Fairfax County, Virginia Code of Ordinances (The Chesapeake Bay Preservation Ordinance). The Board established the ERC pursuant to and in accordance with Virginia Administrative Code Title 9, Agency 25, Chapter 830 (Chesapeake Bay Preservation Area Designation and Management Regulations) and Virginia Code Title 62.1, Article 2.5 (Chesapeake Bay Preservation Act).

4. Chris Koerner resides in Fairfax County, Virginia and is a member of the ERC established by the Board.

5. Amy Gould resides in Fairfax County, Virginia and is a member of the ERC established by the Board.

6. Ann S. Kanter resides in Fairfax County, Virginia and is a member of the ERC established by the Board.

7. James C. Chesley resides in Fairfax County, Virginia and is a member of the ERC established by the Board.

8. Edward W. Monroe, Jr. resides in Fairfax County, Virginia and is a member of the ERC established by the Board.

9. Ken Lanfear resides in Fairfax County, Virginia and is a member of the ERC established by the Board.

10. Elizabeth Martin resides in Fairfax County, Virginia and is a member of the ERC established by the Board.

11. Sue Kovach Shuman resides in Fairfax County, Virginia and is a member of the ERC established by the Board.

12. Monica Billger resides in Fairfax County, Virginia and is a member of the ERC established by the Board.

13. David W. Schnare resides in Fairfax County, Virginia and is a member of the ERC established by the Board.

Venue and Jurisdiction

14. Venue is proper in this Court.

15. This Court has personal jurisdiction over the parties.

16. This Court has subject matter jurisdiction over this dispute.

Facts

17. In or around 1974, K2NC's predecessor-in-interest acquired titled to the Property.

18. The Property is located in the Fairfax Hills subdivision in Annandale, Virginia.

19. Approximately 80% of the Property is within the Resource Protection Area and contains a minor floodplain.

20. In or around 2005, the Fairfax County Department of Taxation classified the Property as "BUILDABLE – AVERAGE LOT" and assessed the Property at $300,000, effective January 1, 2006.

21. In or around 2015, K2NC purchased the undeveloped Property for $330,000 for the purpose of constructing a single family dwelling.

22. In or around 2016, K2NC engaged an engineering firm to proceed with the necessary engineering required for construction of a single family dwelling on the Property.

23. In doing so, K2NC acquired approval from Fairfax County for a Water Quality Impact Assessment, a Resource Protection Area Exception, an Infill Grading Plan and a Conservation Agreement. K2NC also acquired an Entrance Permit from the Virginia Department of Transportation.

24. In or around 2016, K2NC developed architectural plans and applied for a Building Permit and Site Permit. Fairfax County approved and issued a Building Permit and Site Permit to K2NC. Following issuance of these permits, K2NC has engaged consultants, performed site work and incurred substantial expenses in reliance of the permits granted by the County.

25. In or around 2017, K2NC retained another engineering firm and wetlands firm to re-engineer the site for purposes of complying with a restrictive covenant imposing a 75-foot setback requirement dating back to 1941.

26. In doing so, K2NC prepared revised a Water Quality Impact Assessment and a Resource Protection Area Exception for the purpose of requesting approval of an exception for required additional land disturbance within the Resource Protection Area located on the Property due to the 75-foot setback.

27. In or around 2017, K2NC submitted the requisite application to the ERC and worked with Fairfax County Land Development Services staff to make staff-recommended revisions to the application. Fairfax County Land Development Services staff recommended approval of K2NC's application and exception to the ERC.

28. The ERC denied K2NC's application and exception based on matters falling outside of the ERC's mandate and jurisdiction.

29. K2NC appealed the ERC's denial to the Board of Supervisors.

30. Based on representations from the Office of the Fairfax County Attorney, K2NC withdrew its appeal to the Board and re-submitted its application to the ERC with the understanding that the ERC's concerns had been resolved and that the ERC would approve K2NC's application and exception.

31. In or around 2018, K2NC once again worked with Fairfax County Land Development Services staff to respond to staff's technical comments, upgrade content of the application to above-minimum requirements and to make further staff-recommended revisions. Once again, Fairfax County Land Development Services staff recommended approval of the application and exception to the ERC.

32. In or around October 2018, the ERC conducted a public hearing and made a number of new technical comments and recommendations to K2NC's application.

33. At the request of K2NC, the ERC deferred its decision to allow K2NC to address the new comments and recommendations.

34. K2NC revised its application again to address the ERC's comments and recommendations, included additional Best Management Practice elements above minimum County requirements and upgraded the outdated Fairfax County floodplain modeling. Once again, Fairfax County Land Development Services staff recommended approval of the application and exception to the ERC.

35. On December 12, 2018, the ERC conducted another hearing on K2NC's application.

36. Although the ERC acknowledged that K2NC's changes to its application were consistent the ERC's comments and recommendations, on December 12, 2018, the ERC adopted a Resolution denying the application and exception based on new purported concerns.

37. The ERC's Resolution expressly recognized that K2NC made substantial changes to the application "at the suggestion of the ERC," including locating the single family dwelling outside of the seaward 50-feet of the Resource Protection Area, proposal of a Best Management Practice dry swales facility and completing floodplain calculations.

38. The Resolution observed that the changes to the application from K2NC's October 2018 application increased disturbance in the RPA and the seaward 50 feet of the RPA and required additional fill in the RPA, even though the minimal increase in disturbance was a result of the changes requested by the ERC for approval of the application and exception.

39. The Resolution also stated that the "feasibility of the proposed dry swales has not been provided, and no calculations have been provided to demonstrate their effectiveness in mitigating the impact of sediment or nutrient runoff," even though the proposed dry swales are not required, in addition to minimum requirements and an approved practice set forth in Virginia's Stormwater Best Management Practice Clearinghouse.

40. The Resolution did not make any other observations or findings.

41. Based on only the observations and findings noted above, the ERC unreasonably, arbitrarily and capriciously concluded the exception requested by K2NC was "not the minimum necessary to afford relief" because "[i]t is not possible to conclude that the exception would not be of substantial detriment to water quality; and because the property is not suited for the intended use, the exception is based upon conditions or circumstances that are self-created or self imposed."

42. On or around January 9, 2019, K2NC appealed the ERC's denial to the Board.

43. On or around April 9, 2019, the Board conducted a public hearing on K2NC's appeal of the ERC's Resolution.

44. It its report to the Board, the Fairfax County Land Development Services staff informed the Board that (i) the application was amended "to address concerns raised by the ERC;" (ii) the application "shifted the house farther from the stream [and] reduced the size of the proposed deck;" (iii) the application "added Dry Swales that comply with Virginia Department of Environmental Quality standards;" and (iv) the application "studied the floodplain elevation."

45. In its report to the Board, the Fairfax County Land Development Services staff informed the Board that K2NC sought "an exception to add fill in the seaward 50 feet of the RPA in order to move the floodplain boundary towards the stream" which "is necessary for the proposed house location to meet the setback requirement of the floodplain provisions of the Ordinance." Staff informed the Board that "[w]ithout the fill, [K2NC] could not construct the proposed home in compliance with the Zoning Ordinance."

46. In its report to the Board, the Fairfax County Land Development Services staff informed the Board that K2NC's floodplain analysis "establishes the existing floodplain boundary and was used to determine the extent that the addition of fill will encroach into the RPA." Staff informed that Board that "[t]he ERC has the authority to approve the encroachment into the RPA."

47. Contrary to the ERC's arbitrary, capricious and unreasonable Resolution, the Fairfax County Land Development Services staff informed the Board that the ERC "cannot consider the effects of the additional fill in its exception review process, except to the extent that it would cause a substantial detriment to water quality." With respect to water quality, staff

explained to the Board that it is Fairfax County Land Development Services that "is charged with reviewing and approving the addition of fill in the floodplain through a floodplain use determination, which [K2NC] would have to submit in order to proceed to site development." Staff informed the Board that "[t]his review ensures that the addition of fill will have no effect on water surface elevations on adjacent or neighboring properties."

48. In its report to the Board, the Fairfax County Land Development Services staff (i) did not find that the request was not the minimum necessary to afford relief; (ii) did not find that it is not possible to conclude that the exception would not be of substantial detriment to water quality; and (iii) did not find that the exception is based on conditions that are self-imposed and self-created or that the property is not suited for the intended use.

49. On or around April 9, 2019, the Board denied K2NC's appeal (the Board's "Action"). The Board's denial of K2NC's appeal was arbitrary, capricious, unreasonable and not fairly debatable.

50. The Board's Action denying K2NC's appeal expressly recognized that as a result of the 75-foot setback that has burdened the Property since 1941, the only location in which a structure can be built on the Property is within the RPA. The Board further recognized that the proposed single family dwelling has a 2,100 square-foot footprint and is an average to slightly below average-sized home relative to houses within a 500-foot radius of the Property.

51. The Board based its denial of K2NC's appeal on matters falling outside the scope of the narrow and superficial findings and conclusions set forth in the ERC's Resolution, including but not limited to unfounded concerns over the angle of grading, rate of stormwater runoff, location and rate of revegetation, and the impact of impervious surfaces.

52. In denying K2NC's appeal, the Board drew the same unreasonable, arbitrary and capricious conclusions employed by the ERC in its Resolution.

53. The ERC's Resolution and the Board's Action denying K2NC's appeal of the ERC's Resolution were unreasonable, arbitrary, capricious, not fairly debatable, unauthorized, illegal, in violation of Virginia law, in violation of the United States Constitution, in violation of the Virginia Constitution, and without any valid relationship to the health, safety and welfare of the citizens of Fairfax County.

Count I:
Unreasonable, Arbitrary And Capricious Action

54. The foregoing allegations are incorporated as if fully set forth herein.

55. As set forth above, the ERC's Resolution and Board's Action was unreasonable, arbitrary, capricious and not fairly debatable.

56. Section 118-7-6 of the Fairfax County Code requires that every decision of the ERC "shall fully set forth the circumstances of the application and the findings on which the decision is based."

57. K2NC met all of the criteria and requirements to support the grant of an exception by the ERC. K2NC's requested exception (a) is the minimum necessary to afford relief; (b) will not confer upon K2NC any special privileges that are denied to other similarly situated property owners; (c) is in harmony with the purpose and intent of the Chesapeake Bay Preservation Ordinance; (d) is not based upon conditions or circumstances that are self-created or self-imposed; (e) involves reasonable and appropriate conditions that will prevent the allowed activity from causing a degradation of water quality; and (f) met any other findings by the ERC.

58. The ERC's conclusion, which was adopted by the Board's Action, that K2NC's requested exception is not the minimum necessary to afford relief was unreasonable, arbitrary,

capricious and not fairly debatable. The ERC's and Board's conclusion is based on nothing more than the fact that the present application involved more disturbance than an earlier application. In reaching its conclusion, the ERC and Board did not make any finding of what constitutes the minimum necessary to afford relief. Moreover, the ERC and Board's conclusion ignores that fact that the increased disturbance was a result of the substantial changes suggested by the ERC. Furthermore, the limits of disturbance in the RPA for this type of application is 10,000 square feet – a limit that K2NC's application falls comfortably within. K2NC's application is indisputably the minimum necessary to afford the requested relief – a fact to which Fairfax County Land Development Services staff agreed by its repeated support of the application and requested exception.

59. The ERC's conclusion, which was adopted by the Board's action, that it is not possible to conclude that the exception would not be of substantial detriment to water quality was unreasonable, arbitrary, capricious and not fairly debatable. The ERC and Board's conclusion is based on nothing more than the Best Management Practice dry swales proposed by K2NC. However, the Best Management Practices are supplemental and are not even required by Chapter 124 of the Fairfax County Code. As a result, the Best Management Practice dry swales cannot be considered a minimum requirement of K2NC's application. In addition, K2NC did, in fact, provide calculations and computations under the required Virginia Runoff Reduction Method, which demonstrated that K2NC met the Fairfax County requirements for water quality management and the impervious surface standards and was not required to provide a Best Management Practice facility. Furthermore, the Best Management Practice dry swales is a standard design set forth in Virginia's Department of Conservation and Recreation Stormwater design manual and, as such, is a feasible and approved method of water quality management

which is beyond the purview, expertise and jurisdiction of the ERC and the Board. And, Fairfax County has an established process for the design and construction such a Best Management Practice facility which does not require soils testing (contrary to the ERC's suggestion).

60. The ERC's conclusion, which was adopted by the Board's Action, that the exception is based upon conditions or circumstances that are self-created or self-imposed was unreasonable, arbitrary, capricious and not fairly debatable. The ERC's conclusion is based on nothing more than the ERC's erroneous assumption that the Property is not suited for the intended use. The Property is located in a residential subdivision and is classified by Fairfax County as a buildable lot. Indeed, Fairfax County has issued a Building Permit and Site Permit for construction of a single family dwelling on the Property, as well as various other approvals in connection with K2NC's proposed development. The ERC and the Board made no findings supporting the erroneous conclusion that the Property is not suited for a single family dwelling.

WHEREFORE, K2NC requests the Court to enter an order (i) declaring, determining, finding and ruling that the ERC's Resolution and the Board's Action were unreasonable, arbitrary, capricious and not fairly debatable; (ii) reversing the ERC's Resolution and the Board's Action; (iii) remanding the matter back to the ERC, its members and/or the Board with the instruction to grant the application and exception requested by K2NC; and (iv) granting K2NC such other and further relief the Court deems just and proper.

Count II:
Unlawful Regulatory Taking And Unconstitutional Condition

61. The foregoing allegations are incorporated as if fully set forth herein.

62. The ERC's Resolution and the Board's Action constitute a unlawful regulatory taking that interferes K2NC's investment backed expectations in violation of the United States Constitution and the Constitution of Virginia.

63. The ERC's Resolution and the Board's Action are unlawful and lack any merit.

64. The economic impact of the ERC's Resolution and the Board's Action on K2NC is significant and substantial and has directly resulted in, among other economic impacts, a significant diminution in the value of the Property.

65. The ERC's Resolution and the Board's Action has significantly and substantially interfered with the K2NC's investment-backed expectations in that, among other things, the Property cannot be developed as a result of the ERC's Resolution and the Board's Action.

66. K2NC's investment-backed expectations are not speculative.

67. K2NC had and has abundant reason to believe its investment-backed expectations were and are reasonable and accurate and to expect the ERC and the Board to grant K2NC's application.

68. K2NC has a legal right to proceed with the proposed development on the Property.

69. K2NC refused to accept the unlawful, unconstitutional, arbitrary and capricious ERC Resolution as a condition for its application and proposed development on the Property.

70. The unlawful, unconstitutional, arbitrary and capricious ERC Resolution was the controlling basis for the Board's April 9, 2019 Action.

71. As a direct result of the Board's April 9, 2019 Action the unconstitutional ERC Resolution, K2NC has suffered and will continue to suffer compensatory damages of at least One Million Two Hundred Thousand Dollars and 00/100 ($1,200,000.00) to be proven at trial.

72. As a direct result of the Board's Action the unconstitutional ERC Resolution, K2NC has incurred and will continue to incur attorney's fees and court costs in an amount to be proven at trial.

WHEREFORE, K2NC requests the Court to (i) enter an Order declaring, determining, finding and ruling that the ERC's Resolution and the Board's Action constitute an unlawful regulatory taking without just compensation and an unconstitutional condition pursuant to the United States Constitution and the Constitution of Virginia; (ii) enter an order declaring determining, finding and ruling that the Board's April 9, 2019 Action was based on the unconstitutional ERC Resolution; (iii) enter an order declaring determining, finding and ruling that K2NC's refusal to accept the unconstitutional ERC Resolution was the controlling basis for the Board's April 9, 2019 Action; (iv) enter an Order remanding the matter to the ERC, its members and/or the Board with a direction to grant the application and exception requested by K2NC; (v) enter an Order awarding K2NC compensatory damages of at least One Million Two Hundred Thousand Dollars and 00/100 ($1,200,000.00) in accordance with Virginia Code § 15.2-2208.1(A); (vi) enter and Order awarding K2NC its reasonable attorney's fees and court costs in accordance with Virginia Code § 15.2-2208.1(A); and (vii) grant K2NC such other and further relief as the Court deems just and proper.

Count III:
Deprivation of Vested Right

73. The foregoing allegations are incorporated as if fully set forth herein.

74. Prior to the ERC's Resolution and the Board's Action, K2NC was granted permits from the County to construct a single family dwelling on the Property.

75. The permits granted by the County constitute significant affirmative governmental acts.

76. The permits granted by the County remain in effect and allow for the construction of a single family dwelling on the Property.

77. K2NC has relied and continues to rely in good faith on the permits granted by the County.

78. K2NC has incurred and continues to incur extensive obligations and substantial expenses in diligent pursuit of its construction of a single family dwelling on the Property in reliance on the permits granted by the County.

79. K2NC relied upon the permits granted by the County to construct a single family dwelling on the Property.

80. Under Virginia Code § 15.2-2307, K2NC has a vested right in the construction of a single family dwelling on the Property.

81. Under Virginia Code § 62.1-44.15:79, the provisions of the Chesapeake Bay Preservation Act shall not affect vested rights of K2NC.

82. Under Fairfax County Code § 118-1-12, the provisions of the Chesapeake Bay Preservation Ordinance shall not affect vested rights of K2NC.

83. The ERC's Resolution and the Board's Action affect and purport to deprive K2NC of its vested right to construct a single family dwelling on the Property.

84. K2NC has a vested right to construct a single family dwelling on the Property and, as the Board has admitted, the only place a structure can be built on the Property is within the RPA. By denying K2NC's application and exception, the ERC and the Board have purportedly denied K2NC of its vested right to construct a single family dwelling on the Property in violation of Virginia Code § 15.2-2307, Virginia Code § 118-1-12 and Fairfax County Code § 118-1-12.

WHEREFORE, K2NC requests the Court to enter an order (i) declaring, determining, finding and ruling that K2NC has a vested right to construct a single family dwelling on the

Property; (ii) declaring, determining, finding and ruling that the ERC's Resolution and the Board's Action violate K2NC's vested right; (iii) remanding the matter back to the ERC, its members and/or the Board with the instruction to grant the application and exception requested by K2NC; and (iv) granting K2NC such other and further relief the Court deems just and proper.

Rule 3:21 Jury Demand

K2NC demands a trial by jury on all issues so triable.

Date: May 8, 2019

Respectfully submitted,

K2NC LLC

By Counsel

Grayson P. Hanes, Esq. (VSB No. 06614)
Nicholas V. Albu, Esq. (VSB No. 78229)
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Fairfax Circuit Court
Circuit Court
Receipt No. 838106
Receipt Date: 05/08/2019 01:22 PM

Received of: Reed Smith LLP, $ 346.00

Three Hundred Forty Six and 00/100

K2NC LLC vs. Board of Supervisors of Fairfax County Virginia et al.

Filer(s): K2NC LLC

Case	Amount
CL-2019-0006521	
Declaratory Judgment Law ($500,000.01 & above)	346.00
Total:	346.00
Balance due court: $	0.00
Next fine/fee due date:	
Next restitution due date:	

Check (Num: 1228807, Exp: xx/xx)
Amount Tendered: 346.00
Overage: 0.00
Change Due: 0.00

John T. Frey, Clerk of Circuit Court

By: _____
Deputy Clerk
Clerk: NADIGW