

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM MARION COUNTY
Court of Common Pleas

The Honorable H. Steven DeBerry, IV, Circuit Court Judge 2771

Appellate Case No. 2024-000868
Case No. 2023-CP-33-00500

Thomas & Nicole Betancourt, Jimmy & Amie Boatwright, and Norman & Kristina Whetzel.....Appellant(s),

v.

City of Mullins Zoning Board and Dr. Todd Blevins of Blevins Dentistry.....Respondent(s)

REPLY TO RESPONDENTS' MEMORANDUM OPPOSING SUPERSEDEAS

This matter is in regard to an appeal filed against the City of Mullins Zoning Board and Todd Blevins of Blevins Dentistry on the approval of a variance request for a parking lot across the street from Mr. Blevins' office. The only correct information by the Respondents and Counsel, is that the lot in question is zoned AC-1 (Residential/Commercial).

In Judge DeBerry's May 9, 2024 Order, he stated that "The Zoning Board of appeals decision in granting the variance substantially complies with the requirements found in Section 9.3-2 of the Mullins SC Code of Ordinances which is subject of the appeal." However, attached, is Article 9, Section 9.3-2 of the SC Municipal Code of Ordinances, which simply details how the Chairman and Vice-Chairman shall be elected, their length of service, how they are to adopt rules and by laws in accordance with the provisions of the ordinance and statutes and that meetings shall be open to the public. This has nothing to do with the appeal or facts presented in this case

taken directly from the Municode. With all due respect, Judge DeBerry's response and decision, simply disregarded every fact presented that the City of Mullins Zoning Board and Todd Blevins ignored.

Counsel for Todd Blevins, J. Rene' Josey, mentions the August 20, 2023 meeting minutes in his proposed order, and Judge DeBerry references same as "certified copy of the findings...". These documents were filed the day after our April 22, 2024 court date with Judge DeBerry. The "certified copies" meaning the original Two (2) page meeting minutes, available online, and the newly added third page, written in April 2024, by Chairman Spencer Jordan, certified by City Clerk Felicia Sawyer-Norton, not available online. The third page writing by Spencer Jordan, did not exist. This was detailed in our April 23, 2024 response to the Zoning Boards 4/22/24 additional filing in Marion County. With that being said, as of June 25, 2024, we now have in our possession, the audio recording of the entire August 29, 2023 Public Hearing meeting, 51:10 minutes long. The original date was August 20, 2023, but moved to August 29, 2023 because Todd Blevins was on vacation. The audio recording confirms that Spencer Jordan's recollections of irrigation and drainage concerns were not discussed by Curtis, but mentioned by Jimmy & Amie Boatwright, with no response on the matter from Curtis. Curtis did not mention fencing or lighting, Bo McMillan asked Todd Blevins about it. No mention was made by Curtis about codes, regulations, landscaping, elevation, etc. As previously expressed, and now confirmed, Spencer Jordan's writing was written in an attempt to justify their actions and seek to portray Curtis as an "expert witness". For Spencer to sign his name and Felicia to certify this writing as true, is unacceptable, immoral and truly unbelievable. The extent to which the City of Mullins has gone to cover up their own negligence of the law, is despicable. Spencer Jordan and Felicia Sawyer-Norton have perjured themselves with that third page, knowingly signing their names to untrue statements. The audio recording also validates that not one member on the Zoning Board of Appeals had/has any knowledge regarding zoning and variance issues. They were confused and did not understand the reasoning for the Public Hearing. The flashdrive was available for Judge Nettles' review and will be emailed under separate cover to the Appellate Court for their review.

Even more detrimental, we come to Curtis Richardson, "Building Official". On August 10, 2022, Mayor Robert Woodbury welcomed to Mullins our new Building Official, Curtis Richardson, with a Facebook post. However, what Mayor Woodbury failed to mention was that our new

Building Official was not and is not a Licensed/Certified Building Official (CBO) at all. Mr. Richardson is currently holding only a Provisional Building Official License (License #2993). He was issued his Provisional License on 7/19/2022. As a Provisional Building Official, per the South Carolina Code of Regulations, Chapter 8, Article 1, Section 8-115, G, (Classifications and Qualifications for Registration), Provisional must have proof that he is presently employed by a municipality and *is actively in training for a specific certification as a new employee or for advancement to a higher classification*. In Section 8-120, A, (Requirements for Provisional Certification), *A Person registered in the Provisional classification of "Building Official" shall be under the direct supervision of the building official for the local jurisdiction for which employed or actively registered as a residential or commercial inspector*. Curtis Richardson is not doing any of these. He is not actively training. He is not under direct supervision of the building official, as we do not have a certified Building Official and he is not registered as a residential or commercial inspector. Section 8-120, A, again, Curtis has a timeline he is to follow as prerequisites for his classification to becoming a certified building official. One (1) certification for classification within six (6) months of receiving his provisional license, a second prerequisite for certification for the classification within twelve (12) months and any remaining certifications must be completed within twenty-four (24) months of issuance of his provisional registration. This means Curtis is expected to complete his certifications by 7/19/2024. Nicole Betancourt did have a meeting with Mayor Robert Woodbury shortly after the Public Hearing in early September, 2023 regarding Mr. Richardson's position, title and provisional status. Mayor Woodbury was well aware of Curtis's Provisional status and responded that Curtis is "working toward his certificates" and "he was a GC. I am confident he will do a good job".

With that being said, the City of Mullins has Curtis employed in a position he does not have the credentials, qualifications, knowledge, training, certifications or experience to handle. Curtis is not a Building Official. He is "training" to be a Building Official. Someone who does not have the education, understanding and credentials, cannot, in any capacity, have the ability to be considered an "expert witness", or give testimony, on any issue he is not qualified to give. Since Curtis took office as the City of Mullins Building Official, every permit, every inspection, zoning, variance, every plan, drawing, blueprint approved by Curtis Richardson is in jeopardy. It is evident Curtis has yet to learn everything he needs to know to make informed decisions. He absolutely

has not mastered the rules and guidelines of the Municode, which is clear throughout this entire proceeding. Every document Curtis has worked on should be redacted, reviewed, denied or reissued properly and legally by a Certified Building Official or similar classification. Curtis does not have the right to sign his name to anything as the Building Official, as he is not certified to do so, it is unethical, illegal and cause for his Provisional status to be revoked under Section 8-170, C, (Denial, Suspension and Revocation), Defrauded the public or attempted to do so; and, D, displayed incompetence, negligence or misconduct in the practice of code enforcement. When one has yet to complete his training, his prerequisite certifications for classification, he does not have the knowledge to make informed decisions on permitting, zoning, variances, etc. As this entire proceeding confirms, every rule required, in step-by-step detailed order, from the very beginning was not followed and blatantly discarded. To date, by way of Freedom of Information Act Request Forms (FOIA), the City of Mullins cannot provide pertinent information regarding the variance request. Plaintiffs received a Zoning Permit form for the Planning Commission, signed by Todd Blevins on 9/1/23 (after the Public Hearing), with NO signatures of approval from any committee member from Mullins, a Variance Request Form, signed by Todd Blevins on 6/5/23, again with NO signatures of approval from any committee member from Mullins. It is important to note, this request form, and its explanation, was filled out by Curtis Richardson, as the June 5, 2023 emails between Curtis and Todd show, provided by Curtis, via FOIA. This, as well, is unethical and the sole responsibility of the applicant to bear the burden of providing the evidence to support his request. Still missing, although Curtis states it was provided, is the Application for Certificate of Zoning Compliance for the Planning Department, which is what he said is “all he needed” to move forward. We did receive the signed Application for Certificate of Zoning Compliance for a Valerie G Blevins and when asked about it, Curtis said he gave copies of everything related to Blevins. Further questioning his ability to handle a job he is not qualified to do. All of these errors, of the laws, ordinances and administratively, and the fraudulent display of a title he is not permitted to hold, has put the City of Mullins in a very dangerous situation. One wrong approval or decision can be catastrophic, if not handled correctly and by the rules. In Respondents July 1, 2024 Memorandum, attorney J. Rene’ Josey, continues to insist and use as his main evidence that Curtis Richardson, the *City Building Official*, “testified as an expert”. The South Carolina Department of Labor, Licensing and Regulation has laws in place for anyone who would like to become certified and/or licensed in a trade or classification. As of July 8, 2024,

Curtis Richardson is still a registered Provisional Building Official, NOT a Building Official. He is not and cannot be considered an expert in any way. Curtis's "testimony" and every other decision he has made since July 19, 2022 is invalid and against the law.

As mentioned, Mr. Blevins turned in a Zoning Permit form for the Planning Commission, signed 9/1/23. However, as City Council meeting minutes are public knowledge, it is difficult to understand who the Planning Commission is. The July 11, 2023 meeting minutes, Page 3, #8, Mayor's Report clearly reads Mayor Woodbury's notice for the CREATION of a new Planning Commission. In the August 8, 2023 meeting minutes, Page 2, #5(c), he explains, again, the need to get the Planning Commission/Committee up and running. Included in the August 8, 2023 minutes is the SC Code of Laws Section 6-29-340, the Planning Commissions duties, which also corroborates the many laws that were not followed. After August 8, 2023, no mention is made again of the Planning Commission. To date, the City of Mullins still does not have a Planning Commission. So, a question to ask is, who did that Zoning permit form go to? FOIA requests have been ignored from both Curtis Richardson and Felicia Sawyer-Norton regarding any forms, meetings, signatures of approval.

Prime example, Curtis has in the Todd Blevins file, printed by either Curtis or Todd, a printout of a FEMA map indicating our general area is not in a flood zone. However, the map itself was last updated on 10/18/2011. This is severely outdated. With a bit of research, and speaking with FEMA, we learned that each County, City, Municipality, etc. has the right to participate in FEMA, or not. Marion County and the City of Mullins do participate. FEMA does not automatically update areas. It relies on each respective county to monitor changes and inform FEMA. While other Counties, such as Horry, Georgetown & Charleston chose to keep their FEMA data current, (2023), Marion County and the City of Mullins have not informed FEMA of any changes since 2011. (The Pee Dee River constantly flooding, Hurricane Matthew in 2016, Hurricane Florence in 2018), not to mention the known flooding problems right in our area every time it rains hard. This 2011 FEMA map, cannot appropriately be used to claim no flooding issues, hence, why the Municode calls for surveys, blueprints, elevation, drainage plans and research to effectively determine flooding risks. More common and up to date websites such as RiskFactor show a much different picture. The first photo shows the flood risk level. You can see Blevins Dentistry and the Betancourt's elevation is high, across the street (the proposed parking lot) is still higher elevation,

the next house (Boatwright's) is the first in line to the elevation decline on E Lloyd Street heading toward Sandy Bluff Road/917 and moderate flooding. The Boatwright's finished basement flooded with 2018's Hurricane Florence (Photo two) and FEMA did step in to help. The final photo shows the current and future risk of flooding, which is worse. Todd Blevins did not submit any drainage plans, surveys or elevation charts and Curtis allowed Mr. Blevins to begin construction on May 24, 2024. His contractor, Herrington's, cleared the lot, prepped and framed the lot for concrete with no precaution to pitch, no drainage system was installed to offset the additional water that now has nowhere to go but flow directly toward the E Lloyd Street homes who are already dealing with flooding issues for years. Half of the lot has been concreted and the water runoff has already increased water issues in the backyards of E Lloyd Street. The flooding, in itself, is a serious problem. For the City of Mullins to allow Todd Blevins to expand on an already existing detrimental issue, with no regard to the residents in our community, is mind boggling. Pictures of the half-completed parking lot, from E Lloyd Street view, shows the grading decline of the ground, directly towards Boatwright's side fence. This is a recipe for further disaster of the homes on E Lloyd Street.

Respondent's attorney mentions in his July 1, 2024 Memorandum, in his Footnote #1, that the variance request was only for the non-contiguous parking lot use, not the parking lot itself. However, the subject of this entire appeal is the fact that, if the proper rules had been followed, Mr. Blevins is not even eligible for a variance considering, per the Municode, as previously supplied, a variance can only be permitted if it is proven to NOT be self-inflicted. With Two (2) additions to his office in the last couple of years, he has, by law of the Municode, caused his own problem. This does not give him an open door to be granted a variance. As far as the concrete and parking lot, this has been a part of this case from the beginning, as no rules and laws were followed from the beginning regarding the variance OR the parking lot itself. The variance and the concrete go hand in hand. Attorney Josey attempts to state that work was halted upon filing of the Motion to Stay, dated May 22, 2024, however, work actually begin on the parking lot two (2) days later, on Friday, May 24, 2024, right before the holiday weekend. The building permit, supplied by the *Provisional* Building Official, Curtis, was actually "approved" ON May 24, 2024. (Permit attached by way of FOIA). Giving way to more questions of how could work begin on Friday, May 24 at 7am, when the City of Mullins offices do not open until 8:30am and the permit

was not approved until that same day? Herrington's continued work on the parking lot over the weekend and continued after the holiday weekend. Construction did not halt until May 30, 2024, with the Appellate Court's Order to Stay. Again, Counsel for Respondent, fabricates a story without consideration of the evidence available to contradict his claim.

Attorney J. Rene' Josey, references the South Carolina Local Government Comprehensive Planning Enabling Act of 1994, stating that the filing of an appeal in the Circuit Court from the local Zoning Board "does not ipso facto act as a supersedeas", although Rule 241(a) clearly states that the service of a notice of appeal in a civil matter act to automatically stay matters. This is a civil matter. The notice of appeal enacted an automatic stay. Appellants, ALSO filed an emergency motion to stay to reinforce the stay pending appeal due to Mr. Blevins beginning construction two (2) days after filing the Notice of Appeal. In SC Code of Laws Article 9, Section 6-9-80, for a violation of the building codes, "...an adjacent or neighboring property owner who would be damaged by the violation, in addition to other remedies, may apply for injunctive relief, mandamus, or other appropriate proceeding".

He continues to be in violation of parking spaces for his current property. In SC Code of Laws, Chapter 9, Section 6-9-70, a person in violation of the building codes and regulations must be fined, and given seven (7) days to correct the violation. Further fines are to be issued if the violation is not rectified. To date, Respondent is still in violation of his parking spaces.

The City of Mullins claims it is consistent with the growth of Mullins, yet we are on South Main Street, not North Main Street. Every home is zoned Residential. Every one. The Betancourt's, next to Blevins Dentistry, are the only other property zoned AC-1, besides the lot. However, the Betancourt property is utilized as a full-time residence. There is NO business growth when you are the only Commercial property surrounded by homes. A parking lot does not belong in the middle of a residential neighborhood. As the Municode itself states, a C-1 property (Commercial) "...is intended to promote the concentration and vitality of commercial and business in Downtown Mullins...", which is not S Main Street, but routinely known as N Main Street. C-1 property is defined as "...wall to wall, lot line to lot line, development, sidewalk and public parking". Again, this is NOT S Main Street.

Respondents Authenticating Affidavit attempts to demonstrate that the Betancourt's adjacent property is currently being used for commercial purposes, is incorrect. The Betancourt property is an AC-1 property, zoned residential AND commercial. The Betancourt family reside in the home full time 24/7 as their primary residence. The Betancourt's are owners of an electrical contracting company, with a sign outside of their house. There are no employees, no customers, no parking lot, no business office, etc. There is one service van, with the business name, phone number and trade license numbers for each state, as required by the South Carolina Labor Licensing Regulation and the South Carolina Contractor's Licensing Board. The household truck has magnetic business signs when travelling for estimates. Whatever point Respondent's attorney tried to make is not comparable to Mr. Blevins and his dentistry, in addition, the Betancourt property is not in question in the matter.

Consequently, from the beginning of this proceeding, Curtis Richardson's unqualified title of Building Official, the City of Mullins negligence of following laws and guidelines, the Zoning Board members being unknowledgeable of their duties, the absence of committees, the lack of proper documentation, plans and surveys presented by Todd Blevins, the fact that Todd Blevins is legally not eligible for a parking lot variance due to his two (2) additions and the multitude of facts presented by the Appellants, is cause for many questions and concerns as to the validity of the City of Mullins and Mr. Blevins in this case and decisions that have been made. To allow Mr. Blevins to complete his parking lot and make it operational pending this appeal would cause further irreparable damage to the residents dealing with water and flooding issues already. Knowing the City of Mullins did not follow proper procedure of a variance request, did not have the required Committees in place to research and perform their due diligence, and demand the correct documentation be supplied to make an informed decision, has opened the door for a myriad of disasters and irreparable damage throughout this City.

Accordingly, this Court should find it is not in the best interest for the residents in the area, for the proposed parking lot to be completed or become operational. With the imminent danger of water issues and flooding with every rainstorm, the variance and permitting laws ignored and the parking lot itself not being properly surveyed, planned, graded and pitched, the Emergency Stay Pending Appeal and the Petition for Writ of Supersedeas should continue in effect pending this appeal. The parking lot need remain as is and should not become operational.

July 8, 2024

By: /s/ Thomas Betancourt & Nicole Betancourt
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(843) 561-3253

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(843) 289-1323

/s/ Norman Whetzel & Kristina Whetzel
Norman Whetzel & Kristina Whetzel, Pro Se Appellants
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(571) 235-8634

9.3-2. *Proceedings.* The Zoning Board of Appeals shall elect a chairman and a vice-chairman from its members who shall serve for one (1) year or until re-elected and appoint a secretary, who may be a municipal Officer, an employee of the City, or a member of the Zoning Board of Appeals. The Board shall adopt rules and by-laws in accordance with the provisions of this Ordinance and of the General Statutes of South Carolina, Title 6, Chapter 29, Article 5, Code of Laws of S.C., 1976 as amended. Meetings of the Board shall be held at the call of the Chairman and at such other times as the Board may determine. All meetings of the Board shall be open to the public.



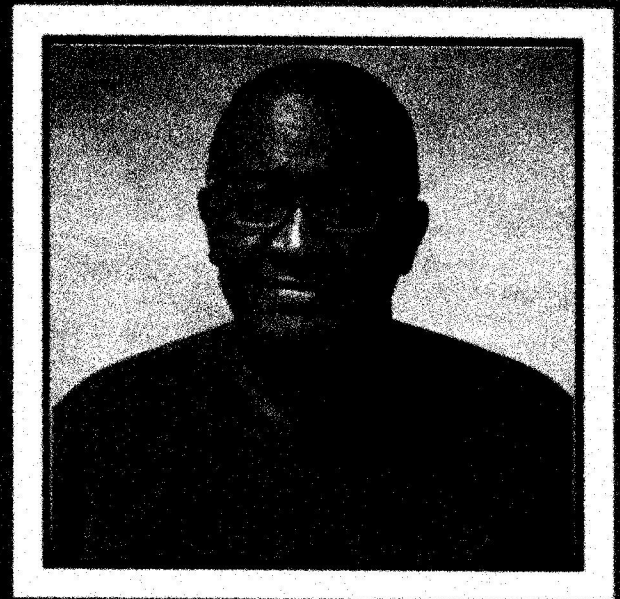
City of Mullins, South Carolina



Aug 10, 2022 · 

The City of Mullins welcomes our new Building Official, Curtis Richardson. He can be reached at City Hall for all questions and concerns regarding permits, zoning and signage. His number is 843-464-5660. We are thrilled to have him in Mullins!

**CITY OF
MULLINS
WELCOMES OUR
NEW BUILDING
OFFICIAL**



Curtis Richardson

843-464-5660

CRichardson@MullinsSC.US

Reimagine Mullins

A CITY OF ENDLESS POSSIBILITIES

[Print this page](#)

Board: Building Codes Council

CURTIS L RICHARDSON
FLORENCE, SC 29506

Phone: (843) 464-5660
Jurisdiction: CITY OF MULLINS
License number: 2993
License type: Provisional Building Official
First Issuance: 07/19/2022
Expiration: 07/19/2024

Board Public Action History:

[View Orders](#)

[View Other License for this Person](#)

License Number	Board	Has Board Orders

[File a Complaint against this licensee](#)

14. "Recognized code organization" means any state or national organization approved by the Council, which administers a testing and certification program specifically for building code enforcement officers or special inspectors.

15. "Registered/Registrant" means approved by Council to practice as a building code enforcement officer, special inspector or contract inspector and listed in a register maintained by the Department.

16. "Residential Inspector" means a person who performs onsite building, plumbing, electrical and mechanical inspections on one and two family dwellings, multifamily dwellings three stories or less in height and not exceeding sixteen (16) dwelling units per building or other buildings or structures of light frame construction and not exceeding five thousand (5,000) square feet in total area.

17. "Single Discipline Inspector" means a person who performs onsite inspections in one construction discipline, as determined by position description for the local jurisdiction for which employed, for all types of construction in all occupancy groups.

HISTORY: Added by State Register Volume 22, Issue No. 6, Part 3, eff June 26, 1998. Amended by State Register Volume 34, Issue No. 6, eff June 25, 2010.

8-110. Registration Required.

It is unlawful for any person to practice as a building code enforcement officer, special inspector or contract inspector as defined in these regulations, without first being registered as provided herein.

As evidence of registration, a certificate of registration must be issued by the Council, to each qualifying individual. The certificate of registration must set forth the classification for which the individual is qualified to practice.

HISTORY: Added by State Register Volume 22, Issue No. 6, Part 3, eff June 26, 1998. Amended by State Register Volume 34, Issue No. 6, eff June 25, 2010.

8-115. Classifications and Qualifications for Registration.

A person applying for registration as a building code enforcement officer, special inspector or contract inspector must be certified in accordance with these regulations. An applicant is deemed to be qualified for registration upon submittal of the following documentation.

- A. Building Official--A certificate or examination record from a recognized code organization, indicating that the applicant has been certified as a building official.
- B. Commercial Inspector--Certificates or examination records from a recognized code organization, indicating that the applicant has been certified in two or more commercial inspector disciplines.
- C. Residential Inspector--Certificates or examination records from a recognized code organization, indicating that the applicant has been certified in the residential building, electrical, plumbing and mechanical inspector disciplines.
- D. Residential Plans Examiner--Certificates or examination records from a recognized code organization that the applicant has been certified in the residential building, electrical, plumbing and mechanical plans examiner disciplines.
- E. Commercial Plans Examiner--Certificates or examination records from a recognized code organization, indicating that the applicant has been certified in the commercial building, electrical, plumbing and mechanical plans examiner disciplines.
- F. Single Discipline Inspector--A certificate or examination record from a recognized code organization, indicating that the applicant has been certified in the discipline for which employed.
- G. Provisional--Proof that the building code enforcement officer is presently employed by a municipality or county in South Carolina and is actively in training for a specific certification as a new employee or for advancement to a higher classification.
- H. Limited
- I. Special Inspector--A certificate or examination record from an approved organization, indicating that the applicant has been certified for the specific type of construction or operation requiring special inspection, for which application is being made, including one or more of the following.
 1. Reinforced Concrete
 2. Welding

S.C. Code Regs. § 8-120

Section 8-120 - Requirements for Provisional Certification

A. Building Official

A person registered in the provisional classification of "Building Official" shall be under the direct supervision of the building official for the local jurisdiction for which contracted or employed or actively registered as a residential or commercial inspector or plan reviewer. If under the direct supervision of the building official, the provisional registrant must provide LLR with written fifteen (15) days' notice when the supervisory relationship changes or terminates. Failure to provide such timely notice of a change or termination in the supervisory relationship may result in cancellation of the provisional certification.

A person registered in the provisional classification of Building Official shall obtain certification within the following time periods: one (1) certification, which is a prerequisite for classification as a certified building official, shall be completed within six (6) months of the issuance of the provisional registration. A second prerequisite for certification for the classification as a certified building official shall be completed within twelve (12) months of the issuance of the provisional registration. Any remaining prerequisite(s) for certification(s) for the classification as a certified building official shall be completed within twenty-four (24) months of the issuance of the provisional registration.

B. Other provisional classifications

A person registered in the following provisional classification shall obtain certification within the time stated.

1. Commercial Inspector - one (1) certification within the first year, then a maximum of one (1) year for each additional certification for all disciplines for which employed, based on the position description for the local jurisdiction.
2. Residential Inspector - one (1) certification within the first year, then a maximum of one (1) year for each additional certification for all disciplines for which employed, based on the position description for the local jurisdiction.
3. Plans Examiner - one (1) certification within the first year, then a maximum of one (1) year for each additional certification for all disciplines for which employed, based on the position description for the local jurisdiction.
4. Property Maintenance Inspector - twelve (12) months.

C. If any of the times referenced above are not met for the completion of certification or for the completion of a prerequisite for certification, the provisional registration shall be lapsed and cancelled and cannot be renewed. Any request for an extension of the provisional registration must be filed within thirty (30) days prior to the registration's expiration date and heard by the Council.

S.C. Code Regs. 8-120

S.C. Code Regs. § 8-170

Section 8-170 - Grounds for Disciplinary Action or Denial

In addition to the grounds provided for in Section 40-1-110, the Council, upon a majority vote, may cancel, suspend, refuse, deny, revoke, or restrict a registration for any of the following reasons:

- A.** been convicted of a felony in any court of competent jurisdiction;
- B.** obtained certification or registration through fraud, deceit or perjury;
- C.** defrauded the public or attempted to do so;
- D.** demonstrates by act or omission, willful misconduct, gross negligence or gross incompetence in the performance of the practice of code enforcement;
- E.** material failure to meet code enforcement duties as evidenced by failure to note serious violations of any adopted code in the performance of an inspection or a material error or omission in an inspection report relating to compliance with any adopted code;
- F.** violated or aided or abetted any person in violation of any provision of the act or these regulations.
- G.** performed any code enforcement activity at a time when their registration was lapsed, inactive or suspended.

S.C. Code Regs. 8-170

Added by State Register Volume 22, Issue No. 6, Part 3, eff June 26, 1998. Amended by State Register Volume 34, Issue No. 6, eff June 25, 2010; State Register Volume 48, Issue No. 05, eff. 5/24/2024.



MULLINS PLANNING COMMISSION
 POST OFFICE BOX DRAWER 408
 Mullins, South Carolina, 20574
 Planner's Telephone No. (843) 273-6068



ZONING PERMIT

Name:	Todd Blevins
Address:	622 South Main St
City/State/Zip:	Mullins SC 29574
Telephone:	843-464-6162

SITE INFORMATION

Location:								
Tax Map No.:		Block #:		Parcel:				
Lot Size:								
Current Use of Property:	OPEN LOT							
Proposed Use:	Commercial	<input type="checkbox"/>	Industrial	<input type="checkbox"/>	Residential	<input type="checkbox"/>	Other	<input type="checkbox"/>
Describe Activity:								
Total Square Footage	Existing Structure		Proposed Structure					

A plat or scaled drawing of the property showing existing and proposed structures must accompany this application.

OWNER INFORMATION

Name:	Todd Blevins
Address:	622 S. Main St Mullins SC 29574

APPLICANT INFORMATION (if different from Owner)

Name:	
Address:	

Signature:	<i>Todd Blevins</i>	Date:	9-1-23
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OFFICE USE ONLY

Current Zoning	AC1	Parking Space	Required		Flood Zone?	Yes		
			Proposed	11		<input checked="" type="radio"/> No		
Sign characteristics	Number of signs (Circle one)	1	Type of signs	Free-standing	Square footage of sign			
		2		Wall				
		3		Address				
				Other				
Setbacks	Front Yard	35	Side Yard	5	Secondary Front Yard	5	Rear Yard	15
Permit Approved	Yes		No					
Zoning Official Signature						Date		



CITY OF MULLINS VARIANCE REQUEST FORM



1. This form must be completely filled out before the applications will be accepted and placed on the City of Mullins Zoning Appeals Agenda.
2. The Board of Zoning Appeals will hold a public hearing on the variance request and call a meeting with thirty days of receiving a completed variance request form.
3. The Zoning Appeals Committee will hear evidence to determine if the conditions set forth in the City of Mullins Zoning Codes for the requested variance are met.
4. All variance request reviewed by the Zoning Appeals Committee shall be decided within Forty-Five (45) days of the day of applications, with a written notice being provided of approval or denial.

PROPERTY OWNER

Name: Dr. Todd Blevins

Address: 622 Main St. Mullins, SC 29574

Phone numbers (Work) 843-333-4992 (Home) _____

REPRESENTATIVE (IF DIFFERENT FROM PROPERTY OWNER)

Name: _____

Address: _____

Phone numbers (Work) _____ (Home) _____

PROPERTY DESCRIPTION & LOCATION

Address: 615 S Main St. Mullins SC 29574

Tax Map Identification #: 4110713000000 Block # _____ Parcel # _____

Size of Property (Acreage/Square feet) _____ @ 10,000 SF _____

Attach Property Map

Zoning (Required):

Current Zoning Classification: AC1

Variance Requested: Exemption from 6.1-2.Land to provide parking. The land to provide off-street parking must be contiguous to and under the same ownership or lease agreement as the principal use for which the off-street parking is to be provided. Current parking at 622 S Main St. does not provide sufficient parking for patients and Employees at the Dentist Office. I request that a Employee parking lot be allowed for off-street parking directly across the street from the business. The parking lot will comply with all ordinance requirement as it pertains to off-street parking.

RECEIVED

Jul 08 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM MARION COUNTY
Court of Common Pleas

The Honorable H. Steven DeBerry, IV, Circuit Court Judge 2771

Appellate Case No. 2024-000868
Case No. 2023CP3300500

Thomas & Nicole Betancourt, Jimmy & Amie Boatwright, and Norman & Kristina
Whetzel.....Appellant(s),

v.

City of Mullins Zoning Board and Dr. Todd Blevins of Blevins Dentistry....Respondent(s)

PROOF OF SERVICE

I, Nicole Betancourt, *Pro Se Appellant*, do hereby certify that the service of the Appellants Reply to Respondents' Memorandum opposing Supersedeas, with enclosures, in the above captioned matter, was made upon all counsel of record by way of US Mail on this 8th day of July, 2024.

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