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September 9, 2025

Town of Salisbury
Planning & Zoning Commission
Attn: Michael Klemens, Chairman
27 Main Street, PO Box 548
Salisbury, CT 06068

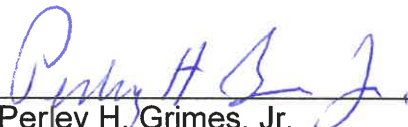
**Application #2025-0287 / Wake Robin LLC & Ms. Serena Granbery (ARADEV LLC)
/ 104 & 106 Sharon Road & 53 Wells Hill Road / Special Permit for Hotel,
Redevelopment of the Wake Robin Inn (Section 213.5) / Map 47/ Lot 2 & 2-1 /**

Re: No Differences Between Klinessmith and Raffaella Cases

Dear Chairman Klemens and Members of the Commission:

In response to the question posed by Abby Conroy, Land Use Director for the Town of Salisbury, there are no differences between the present matter and Raffaella. Both matters involve an attempt to impermissibly expand non-conformities. Any factual and/or procedural variations do not alter or diminish the irrefutable core principle that it is impermissible to expand a non-conforming use.

Respectfully submitted,
On behalf of Angela and William Cruger
Cramer & Anderson, LLP, Their Attorneys


By: Perley H. Grimes, Jr.

PHG/lt

cc: Charles Andres, Esq., Barclay Damon (candres@barclaydamon.com)
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