

313 Lemmon Hill Lane  
Salisbury, MD 21801

O) 410.546.1750  
F) 410.546.1811

CBMlawfirm.com

April 19, 2024

*Via Email and Certified Mail*

Live Wire Media, LLC  
c/o Brad Hoffman  
510 146<sup>th</sup> St. Unit 4  
Ocean City, MD 21842  
[brad@live-wire-media.com](mailto:brad@live-wire-media.com)

**Re: Safari at the Quarry/Connelly Mill Road**

Dear Mr. Hoffman:

This office is legal counsel to the City of Salisbury.

As I am sure you are aware, there has been much discussion at both the City and County level regarding the upcoming "Safari at the Quarry" event which is being organized and promoted by your company. My understanding is that Wicomico County entered into a Memorandum of Understanding with Live Wire Media, LLC dated September 2, 2023. Under this Memorandum of Understanding, Wicomico County has authorized Live Wire to use the County's property on Connelly Mill Road for various Jeep and off-road vehicle events. This property, although owned by Wicomico County, is located within Salisbury City limits and is zoned R-8A Residential.

Neither your company nor Wicomico County consulted with the City prior to entering into the Memorandum of Understanding, nor did the County otherwise seek the City's permission or approval for the anticipated event(s). The overwhelming public opposition on this matter makes it clear that the use must be vetted under the City's Zoning Code in order to withstand a likely legal challenge. Therefore, the City's Zoning Department, along with my office, have reviewed the Memorandum of Understanding and Live Wire's proposed use of the property. In short, it is the opinion of the City of Salisbury that the "Safari at the Quarry" event is not a permitted use in the R-8A Residential zoning district. Further, the use of the property by Live Wire, as detailed in the Memorandum of Understanding, is clearly private in nature and does not fall within any exemption to the City's Zoning Code.

It is the City's desire to amicably resolve this issue, without resorting to costly and protracted judicial action. Therefore, on behalf of the City of

Salisbury, I respectfully request that Live Wire take immediate action to discontinue this event and all future events at the Connelly Mill Road property that are inconsistent with its R-8A Residential zoning, including, but not limited to, privately organized Jeep and off-road vehicle events. To that end, due to the shortness of time, I ask that Live Wire kindly provide assurance to the City of Salisbury by April 24, 2024 that the property will not be used for this event inconsistent with the City's Zoning Code.

Thank you for your attention to this matter.

Sincerely yours,

A handwritten signature in blue ink that reads "Laura E. Ryan" with a stylized initial "WR" at the end.

Laura E. Ryan

cc: Randolph J. Taylor, Mayor  
(via email [rtaylor@salisbury.md](mailto:rtaylor@salisbury.md))  
Andy Kitzrow, City Administrator  
(via email [akitrow@salisbury.md](mailto:akitrow@salisbury.md))  
D'Shawn M. Doughty, Salisbury Council President  
(via email [ddoughty@salisbury.md](mailto:ddoughty@salisbury.md))  
Paul D. Wilber, Esquire  
(via email [pwilber@webbnetlaw.com](mailto:pwilber@webbnetlaw.com))  
Julie Giordano, County Executive  
(via email [jgiordano@wicomicocounty.org](mailto:jgiordano@wicomicocounty.org))