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Robert J. Oliver (1932-2020)
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September 13, 2022

Sent US Mail and Email

Mr. Scott Capovilla
City of Rockford
425 E. State. St.
Rockford, IL 61104

**Re: 611 Auburn Street, Rockford ("Property")
Zoning Approval for Continuation of Special Use Permit**

Dear Mr. Capovilla:

Thank you for the letter dated August 25, 2022. We appreciate your analysis regarding the proposed use compared to the existing Special Use Permit. Although we disagree that "a" person limits the employer to only one person who is not a member of the household, the medical office will operate with one employee.

My client is confident that the proposed use can and will comply with the existing Special Use Permit. Dr. Christensen proposes to use the Property as his permanent secondary residence. He will reside at the Property on occasion when working at the Property. The employer, Rockford Family Planning Center, LLC ("LLC") will operate the medical office. As a member of the household, Dr. Christensen is employed by the LLC. The operation of the medical office requires at least one additional employee. The LLC employs a registered nurse who will be responsible for dispensing medication. She will also meet with patients when Dr. Christensen is not present. The registered nurse is and will be the person who is "employed" and not a member of the household.

The registered nurse will do some administrative work as time allows. However, the administrative needs of the medical office will be performed by an independent consultant. The Administrative Consultant will be an independent contractor who may work 20-35 hours a week, as needed. She will set her own schedule and not be accountable to the LLC or Dr. Christensen for specific hours. Many of her hours may be performed remotely such as accounting and bookkeeping functions. She will perform her work when and where she chooses and will not be employed by the LLC under any circumstances.

Additionally, and only if needed, volunteers may be trained to answer the telephone. It is not clear if such additional assistance will be required. However, volunteers have been identified and are willing to help, if needed. If that occurs, the volunteers would be temporary and not employed by the LLC.



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The medical clinic can clearly continue to operate under the existing Special Use Permit with the employment of a single person not a member of the household. We respectfully request that the City reconsider the decision based on this additional information provided. If you have questions, please feel free to call me.

Very truly yours,

OLIVER CLOSE, LLC


Ann Dempsey

cc: Dr. Dennis Christensen