

MAIN POINTS

- Scott has been having large parties and dancing in his home for years—about two or three times a year—long before he began renting his home on AirBnB.
- We must distinguish between:
 - Scott renting his home for events, as business owner (which he has stopped) and
 - Scott having a private event at his home, as a homeowner (which he still does)
- Short Term Rentals in St. Paul (including bed and breakfasts) have recently undergone a period of uncertainty and change
- Scott has always done his best to comply with the City's regulations
- The Zoning Committee vote on this matter was very close: 4 to 3

THE DEARING HOUSE MANSION

- Built in 1885 by Samuel Dearing
- Designed by Augustus Gauger
- HUGE: 10,000 square feet
- 6 bed rooms
- 9 fireplaces
- This is the most well-preserved and restored Gauger home in Minnesota, and has been visited by thousands of people from all over the country and the world
- The house is a cultural, architectural and historical gem

SCOTT KRAMER

- A professional building remodeler and restoration specialist
- Remodeling historic homes is his passion and profession
- Scott likes to dance and throw an occasional large party at his home (about 2 per year)

SCOTT KRAMER AND THE DEARING HOUSE MANSION

- 2005: Scott buys the Dearing Mansion and takes a year renovating it
- 2006: Scott has his first New Year's Eve Party
- 2006 to 2017: Scott has a New Year's Eve Party every year
- 25 to 150 people at each party
- Other events throughout the years
- Fourth of July Parties
- "VOTE NO" and other Political Rallies

**Why do some people say “hedonism”
like it’s a BAD thing?**

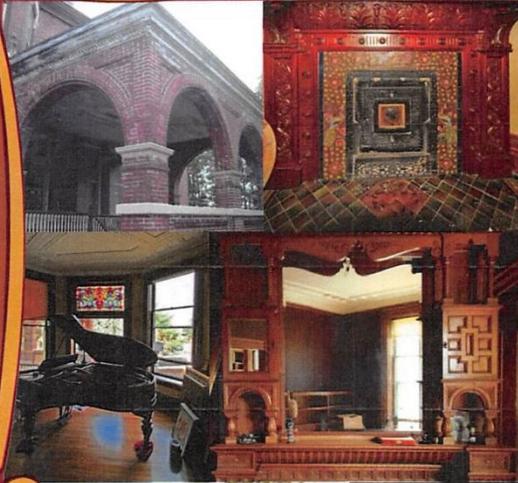


Join Us for a Bacchanal of New Year’s Opulence, Decadence and Downright Naughtiness:

New Year’s Eve • 8:00 p.m. – 1:00 a.m.

The Dearing Mansion (now the home of Scott and

241 West George Street • St. Paul



About The House:

The Dearing Mansion is located at 241 West George Street, just 3 blocks east of Smith Avenue across St. Paul's High Bridge. This lovely 1880s home was designed by Augustus Gauger, and it will be the perfect setting for a *Bacchanal New Year*.

About the Party:

The evening will offer many opportunities to celebrate the New Year in an opulent fashion. The house has nine unique fireplaces, and one will be dedicated to burning written testaments of what you'd like to leave behind in 2006, and another will be for sending up a special request to the gods for 2007.

_____ dancing with abandon and writing scandalous resolutions (for yourself and others) will all be encouraged.

Bring your idea of fabulously decadent food and a bottle of something lovely to share. You are also welcome to bring your most fascinating friends if you ask your hostess.

RSVP to the individual who sent you the invitation _____

_____. Questions can be directed to the same source.

Phone number for the evening is _____ and parking is available next door in the church parking lot.

**We hope to see you in St. Paul
for a Bacchanal New Year's
celebration...**

**1887 SPEAKEASY + DEARING MANSION
PRESENT**

**SOULCIAL FUNKTION
NEW YEAR'S EVE**

**WITH DJ GARRISON GROUSE
GUEST DJ SET BY BEATRIX JAR**

NO COVER

21+

10PM TILL WE FEEL LIKE IT

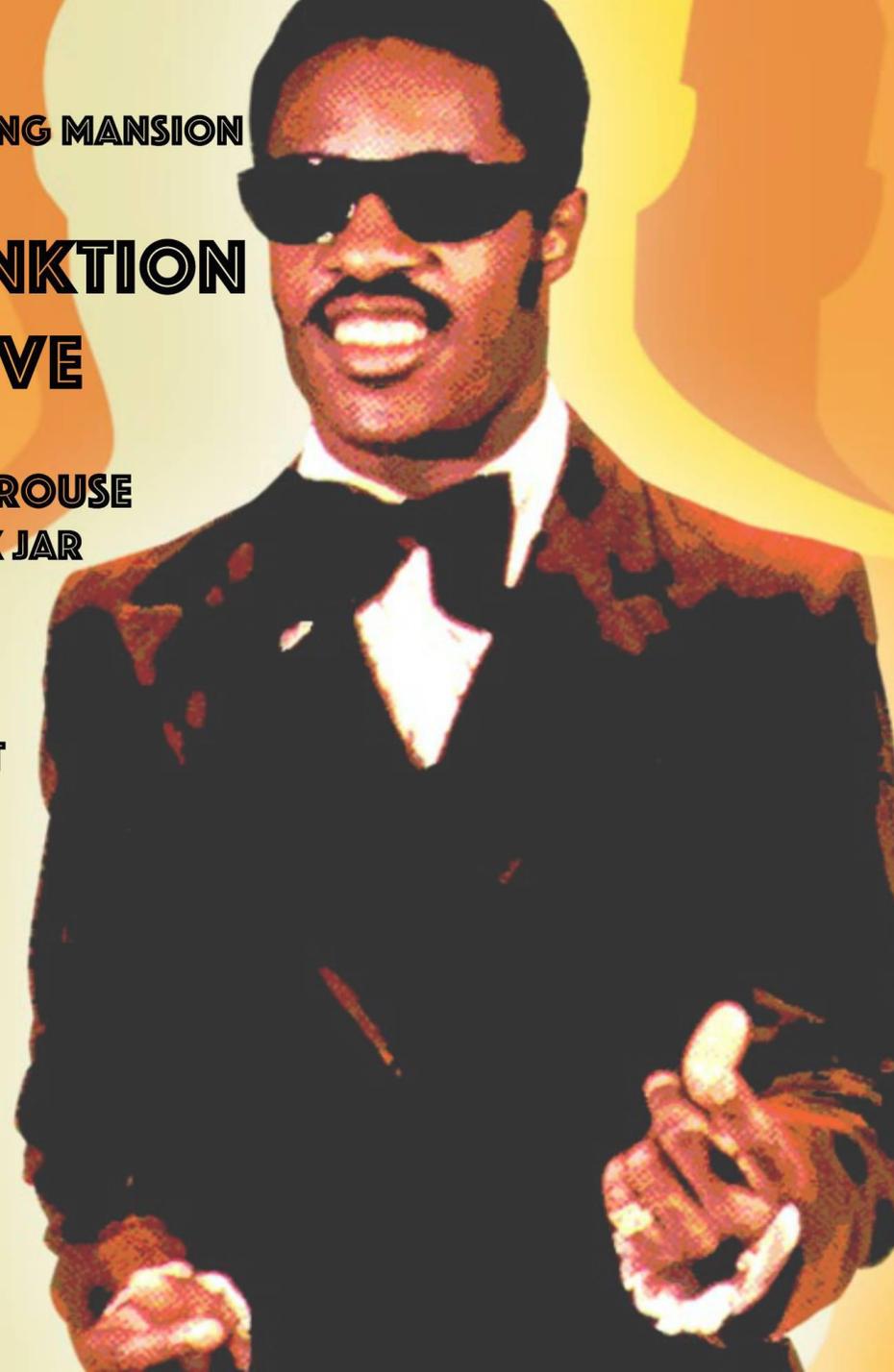
DEARING MANSION

241 GEORGE ST

W, SAINT PAUL,

MINNESOTA

55107



kiss 2010 goodbye!

Featuring music for dancing by
Nayman Tracy Nayman

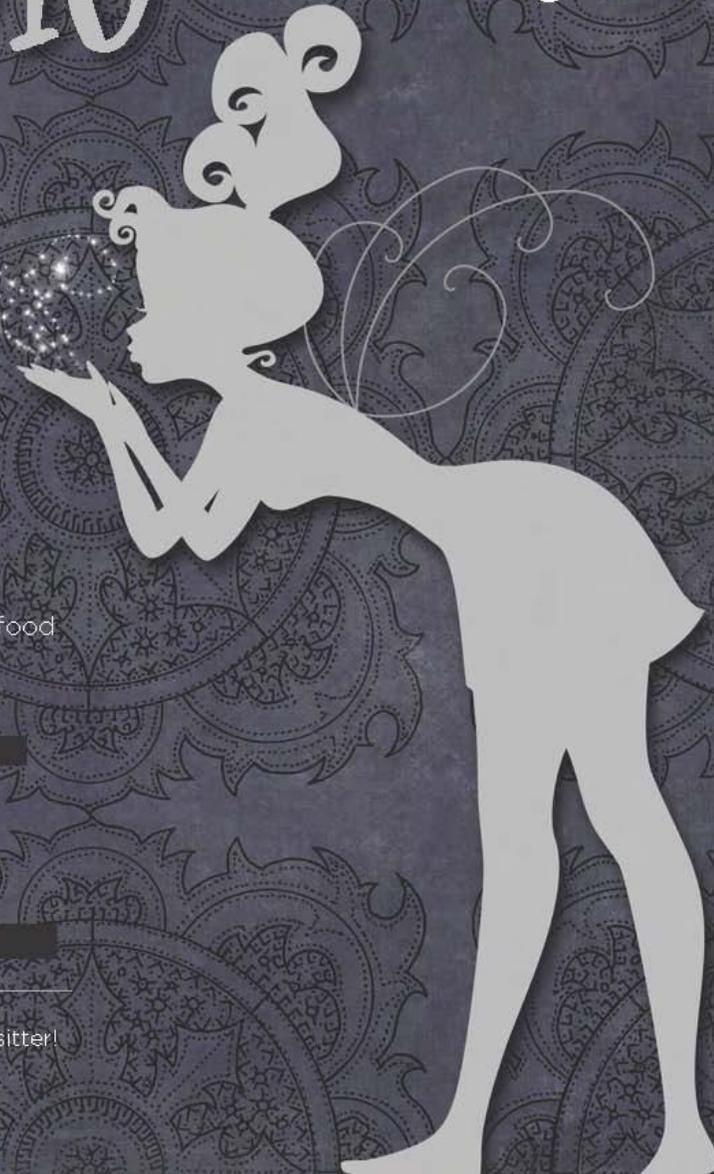
Dress festive + bring fun friends, good food
and a bottle to share

8 pm on New Year's Eve

The Dearing Mansion
241 West George Street
Saint Paul, MN 55107

Please RSVP
[Redacted]

Small print: This party is for adults so get a sitter!
[Redacted]



2011

The Mayans said the
world ends in 2012.



Lets make the most of it!

Let's put another ancient
prophecy to rest by celebrating

THE NEW YEAR'S EVE END OF THE WORLD PARTY

at the Dearing Mansion.

Saturday night, December 31, 2011

8 P.M. UNTIL VERY LATE

Leave the children at home. Put on the bells and whistles and dress up!
Bring a dish you would want for your last night on earth and a bottle
to share. Invite along your most fun friends to share the evening and
carouse, dance and flirt the night away!

DEARING MANSION
241 West George Street
Saint Paul, MN 55107

RSVP



Don't stay home.
Come out and play!



The background of the entire poster is a dark, ornate wall featuring a central relief sculpture of a cherub or putto. The cherub is depicted in a dynamic, dancing pose, holding a long, thin object that resembles a sword or a musical instrument. The wall is decorated with intricate scrollwork and floral motifs. The text is overlaid on this background in white, with some elements highlighted in dark rectangular boxes.

YOU ARE INVITED!

— ∞ — TO THE ∞ —
7TH ANNUAL

241 GEORGE STREET NEW YEARS EVE PARTY

Things to bring:

- *Fun Friends that enjoy Historic Mansions
- *Dancing Shoes or High Heeled Sneakers
- *Your favorite music. The DJ will play it!
- *Wine, Beer, Champagne, and/or a snack to share

241 George st. W.
Saint Paul, MN 55107

8PM - Late

18+

RSVP's are Encouraged

“ No one looks back on life
and remembers the nights
they got plenty of sleep. ”

2010



Once in a Blue Moon there is a party like this.



Your hosts 
invite you to celebrate the start of 2010 at the Dearing
Mansion on St. Paul's historic west side.

What: Fires in many of the nine fireplaces for cozy conversation, dancing in the music room, dazzling view of the downtown skyline, new friends and great food.

Where: 241 West George Street in St. Paul

When: December 31, 2009 — 8 pm until late

Wear: Something festive and dancing shoes.

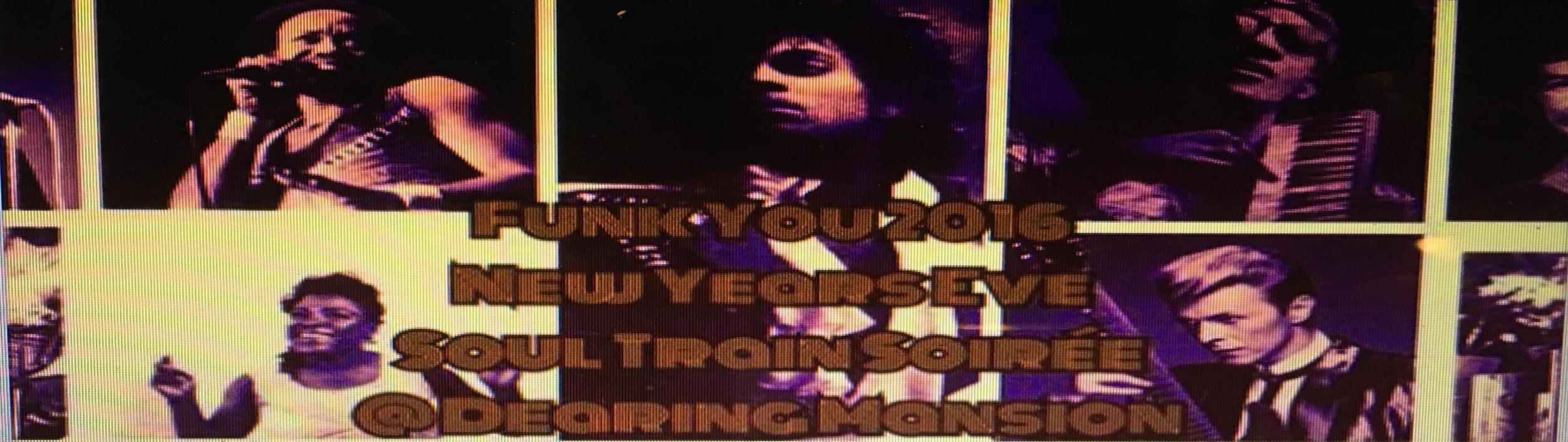
Bring: A bottle to share and something good to eat.

Who: The Twin Cities' most interesting people, of course. You are welcome to bring along friends who love a good party.

You may park in the church parking lot next to our house, but please be respectfully quiet when you leave. Bring your adorable kids to our Fourth of July party. New Year's Eve is for adults only.

Please RSVP!





DEC
31

FUNK YOU 2016 New Years Eve Soul Train Soiree

Private · Hosted by Garrison Dakota Grouse and 3 others

✓ Going ▾

 Edit



○ Saturday, December 31, 2016 at 9 PM
More than a year ago

○ Dearing Mansion
241 George St W, Saint Paul, Minnesota 55107

Show Map

DARK ENERGY &
PHONIC NARCOTIC PRESENTS

MURDER

AT DEARING MANSION
A NEW YEAR'S EVE SOIREE

4 LEVELS OF FREAKY FUN

- | Basement dance party and sauna lounge
- | Main level with live music by Gold Filled and Alex White in the piano parlor
- | Upper level with theme rooms curated by Rachel Girard
- | Top level dance party and smoking lounge

Other amenities:

- | Premium open bar with craft cocktails
- | Gourmet meal served buffet-style
- | Desserts and hors d'oeuvres in the master dining area



HOSTED BY

YOUR DJs

CHAD FJERSTAD (LA) | ANGELICA OTTAVIA
NANCY CHENG | LEA REED | ALEX UNCHAPER
STAINLESS STEEL PROVIDERS | GRANT MAYLAND
SASHA B. WARE | PHONIC NARCOTIC | FØØLPRØØF

FEATURING ARTWORK BY CAITLIN KAROLCZAK AND BETHANY ANYA

\$35 ENTRY | DEARING MANSION | 9PM UNTIL LATE

SCOTT KRAMER AND THE DEARING HOUSE MANSION

- 2013: Scott begins renting the Dearing Mansion on AirBnB and VRBO.
- 2014: The City approaches Scott and says he needs a permit.
- 2014: Scott applies for and receives a conditional use permit for a bed and breakfast.
- 2016: Scott receives an enforcement letter because he advertised his house for event rentals.

SCOTT KRAMER AND THE DEARING HOUSE MANSION

- 2016 to 2017: Scott meets with DSI and others and stops renting his home for events
- March 24, 2017: Scott's conditional use permit is modified to allow six-bedroom rental and to include a condition prohibiting use of the home as a "small conference center, private retreat center, or reception house"
- October, 2017: The City modifies its Bed and Breakfast Ordinance
- December, 2017: The City's Short Term Rental Ordinance takes effect
- December 31, 2017: Scott throws his annual New Year's Eve Party

UNCERTAINTY AND CHANGE IN THE REGULATIONS

Go to video now, please.

CITY ORDINANCE REGARDING BED AND BREAKFASTS IN 2016:

65.6541(e):

Dining and other facilities shall not be open to the public, but shall be used exclusively by the residents and registered guests.

WAS CHANGED IN 2017 TO:

65.641(e):

Use of a bed and breakfast residence for any commercial or social event is prohibited.

THE 2017 CONDITION TO SCOTT'S PERMIT STATES THAT:

The bed and breakfast residence shall not be used as a small conference center, private retreat center, or reception house for weddings, reunions, or parties.

WHAT DO THESE REGULATIONS MEAN?

- Does Scott need to stop having his annual New Year's Eve Party because he has a bed and breakfast license?
- Is there a limit to the number of people Scott can invite to his house?
- Is there a limit to how many parties he can have?
- Do the regulations effectively separate what Scott can do privately, versus what Scott and his guests can do at his business?

FIRST CONCLUSION

- Scott's 2017 NYE party was not associated with the bed and breakfast regardless of whether it was a "social event" or a "commercial event."
- The ordinance only prohibits rentals to guests who will use the home for social and commercial events—it does not prohibit the home owner from having either social or commercial events.
- Scott does not operate the home as a reception center, retreat center, or
- Scott did not rent out his home for someone else to throw the party, and so he could not have violated the permit or the ordinance.

OTHERWISE, TOO MANY OF THE HOMEOWNER'S ACTIVITIES WOULD BE CAPTURED AND PROHIBITED UNDER THE ORDINANCE:

- Superbowl parties
- Holiday dinners with extended families
- Political and charitable gatherings and fundraisers
- Garage or Yard sales
- In-home art studio or home office
 - In-home daycare
- Parties to sell jewelry, tupperware, etc.
- Just having friends over to watch a movie

And the homeowner would be unaware that he or she was giving up certain property rights in exchange for the Bed and Breakfast license.

SECOND CONCLUSION:

The ordinance is *vague* as to what “social events” are prohibited

- Even if you don’t describe the party as a “commercial event,” it is without question a “social event.”
- So did the party violate the ordinance and CUP as a “social event”?
- If so, why?
- After all, it was Scott’s personal and private party for his friends.
- On the other hand, if it was a social event that did not violate the ordinance, why did it not violate the ordinance?
- Answer: because it was not associated with the bed and breakfast.

THIRD CONCLUSION

- A. Scott violates the ordinance and conditional user permit only if he rents out his house for someone else to have an event.
- B. Scott is not operating as a prohibited “*small conference center, private retreat center, or reception house*” just because he has a party for his friends in his house.
- Any other conclusion would lead to the absurd result that Scott violates the ordinance any time he has a “social event” for himself at his own home.

PLEASE REVIEW CLOSELY THE **ZONING COMMITTEE MINUTES** FROM MARCH 29TH AND APRIL 26, 2018, THE **MEMO** FROM MY LAW FIRM, AND THE **LETTERS IN SUPPORT OF SCOTT**—ESPECIALLY THE STATEMENTS FROM SCOTT'S FRIENDS WHO DJ-ED THE PARTY.