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FERDINAND F. PETERS, ESQ. LAW FIRM

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November 4, 2015

Shari Moore
City Clerk of St. Paul
310 City Hall
15 Kellogg Blvd., West
St. Paul, MN 55102
Fax: 651-266-8574
Email: cityclerk@ci.stpaul.mn.us

**Subject: 2015 ROW Assessment - Notice of Appeal to District Court
2300 Long Avenue and 841 Bradford Street, St. Paul, MN 55114**

Dear Ms. Moore:

Lakes & Plains, LLC is owner of commercial properties, 2300 Long Avenue and 841 Bradford Street located on a corner lot in St. Paul. Lakes & Plains LLC objects that the value of commercial properties has not been increased by the amount of the special assessment.

Lakes & Plains LLC knows of no special benefit received by its property by virtue of usual and customary service provided by the City to the streets. These services are not different from those provided elsewhere throughout the city and which services should have been covered by the City's normal budget and ad valorem tax procedures.

In addition, Lakes & Plains LLC also objects that the City improperly calculated the frontage feet of the property located at 2330 Long Avenue (PID 29-29-23-42-0106). The frontage feet used to calculate the Right-of-Way Maintenance Assessment for 2330 Long Avenue for 2012 was 208 feet, while the frontage feet used to calculate the Right-of-Way Maintenance Assessment for 2330 Long Avenue for 2015 is 317 feet. There has been no change to 2330 Long Avenue since the 2012 Right-of-Way Maintenance Assessment that would justify this change in frontage feet.

Please feel free to contact me if you have any questions or concerns regarding this matter. Thank you.

Sincerely,



Ferdinand F. Peters

*P.S. I also object since this property
is a corner commercial lot &
is not assessed fairly in comparison to non-
corner lots.*