

HADAC LAW OFFICE PLLC

VIA EMAIL TO Contact-Council@ci.stpaul.mn.us

August 15, 2023

15 West Kellogg Blvd
310 City Hall
St. Paul, MN 55102

Re: **Objection and Intent to Appeal**
Property Owner: Alliance Center LLC
Project: St. Paul Downtown Improvement District Proposed Service Charge
Property Address: 56 6th Street, Unit 1 (the "Property")
Property ID: 06-28-22-12-0298

Dear Mayor, City Clerk, and the St. Paul City Council Members:

I am legal counsel for Alliance Center LLC ("Alliance"), a Minnesota limited liability company and owner of the Property.

This letter is intended to serve as Alliance's written objection to any service charge being imposed against the Property relating to the St. Paul Downtown Improvement District.

Alliance objects to the proposed service charge because it receives no benefit for the proposed amount of money being charged. Over the course of the last few years, it has become very apparent that the Downtown Improvement District provides no increased level of service compared to the service that is ordinarily provided throughout the city from the general fund revenues. In any event, the proposed service charge greatly exceeds the amount needed to pay for any alleged increase level of service in violation of Minn. Stat. § 428A.03, subd. 1 and

other laws. This is likely why the Revised Notice of Public Hearing provides no detail of the charges (and indeed the “total estimated budget for full program implementation in year 2024” varies from \$1,324,240 on the Revised Notice to \$1,299,240 on the Proposed Service Charge sheet). What is the accurate number? The City has failed to provide any such notice.

Sincerely,

/s Kelly S. Hadac

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