



# APPEAL APPLICATION FOR RENT STABILIZATION DETERMINATIONS

Saint Paul City Council – Rent Stabilization  
310 City Hall, 15 W. Kellogg Blvd.  
Saint Paul, MN 55102  
651-266-8568

RECEIVED

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CITY CLERK

***We need the following to process your appeal:***

- \$25 filing fee (non-refundable (payable to the City of Saint Paul
- Copy of the Department of Safety & Inspections Determination Letter
- Attachments you may wish to include
- This appeal form completed
- Walk-In     Email     US Mail

<p><b>HEARING DATE &amp; TIME</b> <i>(provided by Rent Stabilization Appeals Staff)</i></p> <p><b>THURSDAY:</b> <u>August 3<sup>rd</sup> 10<sup>am</sup></u></p> <p><b>TIME:</b> <u>10am</u></p> <p><b>LOCATION OF HEARING:</b> Room 330 Saint Paul City Hall 15 West Kellogg Blvd. Saint Paul, MN 55102</p>
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***Address Being Appealed:***

200 Winthrop St. S., Apt. 313	St. Paul, MN	55119
Number & Street & Unit Number (if applicable)	City & State	Zip Code

**\*\*Ms. Mohamed is represented by Housing Justice Center in this Appeal. For**

***Appellant:*** questions, please contact her attorneys at the below email or phone number.

Sumeya Mohamed	jporadek@hjcmn.org; ahanson@hjcmn.org
Appellant Name	Email
(612) 723-0517; (612) 807-1139 ext. 702	
Preferred Phone Number	Alternate Phone Number
/s/ Sumeya Mohamed, 7/7/2023	Tenant
Signature & Today's Date	Is Appellant: Property Owner/ Manager <i>OR</i> Tenant ?

***Property Owner (if other than appellant):***

G&I X Phoenix Apartments LLC; Marquette Management	
Property Owner Name	Email
Preferred Phone Number	Alternate Phone Number

***What Is Being Appealed and Why? Attachments Are Acceptable***

Please see Memorandum attached to submission email and accompanying exhibits.

## Sonia Romero

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**From:** Abbie Hanson <ahanson@hjcmn.org>  
**Sent:** Tuesday, July 18, 2023 3:43 PM  
**To:** Sonia Romero  
**Subject:** Ms. Mohamed summary

**Think Before You Click:** This email originated **outside** our organization.

Hi Sonia,

Perhaps the below would work as a short summary?

Ms. Mohamed is appealing the approval of her rent increase at Haven. She bases her appeal primarily on alleged violations by Marquette of the implied warranty of habitability, codified in Minnesota Statutes Section 504B.161. Marquette's violations of Minn. Stat. 504B.161 prohibit the City from granting Marquette's rent-increase application. St. Paul, Minn., Legislative Code § 193A.06(c). Ms. Mohamed also argues that Marquette has decreased housing services provided at Haven, unreasonably increased its operating expenses, and that capital improvements have been improperly included in the total rent increase.

**Abbie Hanson** (she/her/hers)

Housing Justice Litigator

612-807-1139 ext. 702

[ahanson@hjcmn.org](mailto:ahanson@hjcmn.org)

