

JOHN G. HOESCHLER, P.A.
ATTORNEY

800 Lone Oak Road
Eagan, MN 55121
jghoeschler@comcast.net

Phone: 651-683-1868
Fax: 651-681-6868
Cell: 651-324-1694

September 8, 2015

Council President Russ Stark
310-D City Hall
15 West Kellogg Blvd.
St. Paul, MN 55102

Mayor Chris Coleman
City Hall
15 West Kellogg Blvd.
St. Paul, MN 55102

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

Re: Raymond Avenue Phase II Assessments
Parcel Nos. 292923420103, 292923420003, 292923130060

Madame and Gentlemen:

I represent Update Company and Charles and Caroline McCann, the owners of property nominally at 970 Raymond Ave., St. Paul, having the above PIDs. We wish to formally object to the \$55,993 of special assessments you intend to levy on the following grounds:

1. There is no special benefit to our property.
2. Our property has no or limited access onto Raymond Ave., because of a 5'-25' difference in grade for much of it.
3. We have experienced substantial damages from the closure of the Raymond, which damages we understand you do not intend to offset or compensate.
4. The imposition of these assessments is the result of mistakes of law and fact on the part of the City.

Thank you for your consideration.

Yours very truly,

John G. Hoeschler

JGH/mv