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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

1728 Hague Avenue and 1703 Laurel Avenue, St. Paul, MN 55104

Dear Ms. Moore:

Ferdinand and Gisela Peters are owners of commercial properties, 1728 Hauge Avenue and 1703 Laurel Avenue located on a corner lot in St. Paul. Ferdinand and Gisela Peters object that the values of properties have not been increased by the amount of the special assessment.

The City has failed to appraise Ferdinand and Gisela Peters' properties to verify and prove that special benefit received by said properties as is required by state law.. Ferdinand and Gisela Peters know of no special benefit received by their properties by virtue of usual and customary service provided by the City to the streets abutting the properties. These services are not different from those provided elsewhere throughout the city, which services should have been covered by the City's normal budget and ad valorem tax procedures.

Thus, finding that there is no benefit, or a disproportionate benefit, to the properties as a result of the 2015 St. Paul Right-of-Way Maintenance Assessments applied to each. Ferdinand and Gisela Peters request the City of St. Paul to re-compute and amend its assessment roll accordingly.

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

Sincerely,

Ferdinand F Peters

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