

From: [Flowers, Portia \(CI-StPaul\)](#)
To: [Vang, Mai \(CI-StPaul\)](#); [Tierney, Rachel \(CI-StPaul\)](#); [Moermond, Marcia \(CI-StPaul\)](#); [Naylor, Racquel \(CI-StPaul\)](#); [Tinkham, Julie \(CI-StPaul\)](#)
Subject: RE: Affidavit of Service - Broos
Date: Thursday, January 6, 2022 9:59:31 AM
Attachments: [image002.png](#)
[image005.png](#)
[image001.png](#)
[image006.png](#)

Mai,
Thanks for the documents.

Marcia and Racquel,

These documents do not meet the standards for initiating an appeal or other legal action against the City. They have not been filed with the district court and there are no pending matters involving these submissions or the City's interactions with John or Carol Broos. At this point, there is no action that Litigation can take in response. You should continue to process the assessments and other actions involving the Broos property per your standard procedures; and keep all documentation per your typical retention schedule. (Because there is no pending litigation, we will not open a file or retain copies of the documents associated with the property.)

Please let me know if you have any questions.

Portia Hampton-Flowers

Chief Deputy City Attorney

Pronouns: she/her/hers

Office of the City Attorney

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MINNESOTA

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From: Vang, Mai (CI-StPaul) <mai.vang@ci.stpaul.mn.us>
Sent: Wednesday, January 5, 2022 9:31 AM
To: Tierney, Rachel (CI-StPaul) <rachel.tierney@ci.stpaul.mn.us>; Moermond, Marcia (CI-StPaul) <marcia.moermond@ci.stpaul.mn.us>; Naylor, Racquel (CI-StPaul) <racquel.naylor@ci.stpaul.mn.us>; Tinkham, Julie (CI-StPaul) <Julie.Tinkham@ci.stpaul.mn.us>; Flowers, Portia (CI-StPaul) <portia.flowers@ci.stpaul.mn.us>
Subject: RE: Affidavit of Service - Broos

Hi Everyone,

Sorry for the delay. Attached all appeals related to 1223 Farrington St. Please note, there is one scheduled for Legislative Hearing tomorrow, January 6.

Mai Vang

City Council Offices – Legislative Hearings

15 W Kellogg Blvd, 310 City Hall

Saint Paul, MN 55102

M: (651) 266-8585 | D: (651) 266-8563

Legislative Hearing Appeals – www.stpaul.gov/legislative-hearings



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From: Tierney, Rachel (CI-StPaul) <rachel.tierney@ci.stpaul.mn.us>
Sent: Monday, January 3, 2022 8:26 AM
To: Moermond, Marcia (CI-StPaul) <marcia.moermond@ci.stpaul.mn.us>; Naylor, Racquel (CI-StPaul) <racquel.naylor@ci.stpaul.mn.us>; Tinkham, Julie (CI-StPaul) <Julie.Tinkham@ci.stpaul.mn.us>; Flowers, Portia (CI-StPaul) <portia.flowers@ci.stpaul.mn.us>
Cc: Vang, Mai (CI-StPaul) <mai.vang@ci.stpaul.mn.us>
Subject: RE: Affidavit of Service - Broos

Julie;

Based on this information, these appear to be abatement appeals.

From: Moermond, Marcia (CI-StPaul) <marcia.moermond@ci.stpaul.mn.us>
Sent: Sunday, January 2, 2022 5:14 PM
To: Tierney, Rachel (CI-StPaul) <rachel.tierney@ci.stpaul.mn.us>; Naylor, Racquel (CI-StPaul) <racquel.naylor@ci.stpaul.mn.us>; Tinkham, Julie (CI-StPaul) <Julie.Tinkham@ci.stpaul.mn.us>; Flowers, Portia (CI-StPaul) <portia.flowers@ci.stpaul.mn.us>
Cc: Vang, Mai (CI-StPaul) <mai.vang@ci.stpaul.mn.us>
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All, Yes, this is a strange one. I have attached one of the appeal statements submitted in objection to their garbage hauling assessment. Make of their stamps and signatures what you will. We made attempts to reach them to discuss their appeal in a hearing setting, but they did not answer their phone on any of our attempts. As an aside, I think the clock has long since run out on all of these assessments for appeal to district court.

Mai, Can you put together packets for each of their 4 appeals for the benefit of litigation?

Thanks, Marcia

From: Tierney, Rachel (CI-StPaul) <rachel.tierney@ci.stpaul.mn.us>
Sent: Friday, December 31, 2021 8:12 AM
To: Naylor, Racquel (CI-StPaul) <racquel.naylor@ci.stpaul.mn.us>; Tinkham, Julie (CI-StPaul) <Julie.Tinkham@ci.stpaul.mn.us>; Flowers, Portia (CI-StPaul) <portia.flowers@ci.stpaul.mn.us>
Cc: Moermond, Marcia (CI-StPaul) <marcia.moermond@ci.stpaul.mn.us>
Subject: RE: Affidavit of Service - Broos

Adding Marcia in case she can shed light.

From: Naylor, Racquel (CI-StPaul) <racquel.naylor@ci.stpaul.mn.us>
Sent: Wednesday, December 29, 2021 10:21 AM
To: Tinkham, Julie (CI-StPaul) <Julie.Tinkham@ci.stpaul.mn.us>; Tierney, Rachel (CI-StPaul) <rachel.tierney@ci.stpaul.mn.us>; Flowers, Portia (CI-StPaul) <portia.flowers@ci.stpaul.mn.us>
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If it helps, they have had several items in front of the Legislative Hearing Officer:

RLH TA 20-236	Resolution LH Tax Asses	Passed	Ratifying the Appealed Special Tax Assessment for property at 1223 FARRINGTON STREET. (File No. CG2001C2, Assessment No. 200109)	7/22/2020
RLH TA 20-348	Resolution LH Tax Asses	Passed	Ratifying the Appealed Special Tax Assessment for property at 1223 FARRINGTON STREET. (File No. CG2002C1, Assessment No. 200128)	8/26/2020
RLH TA 21-350	Resolution LH Tax Asses	Passed	Ratifying the Appealed Special Tax Assessment for property at 1223 FARRINGTON STREET. (File No. CG2102A2, Assessment No. 210107)	8/25/2021
SR 21-44	Staff Report	Archived	Review Request for Ratifying the Appealed Special Tax Assessment for property at 1223 FARRINGTON STREET (File No. CG2004A3, Assessment No. 200165) adopted by Council on March 10, 2021 under File No. RLH AR 21-12.	4/8/2021

-Racquel, 6-8573

From: Tinkham, Julie (CI-StPaul) <Julie.Tinkham@ci.stpaul.mn.us>
Sent: Wednesday, December 29, 2021 10:17 AM
To: Tierney, Rachel (CI-StPaul) <rachel.tierney@ci.stpaul.mn.us>; Flowers, Portia (CI-StPaul) <portia.flowers@ci.stpaul.mn.us>
Cc: Naylor, Racquel (CI-StPaul) <racquel.naylor@ci.stpaul.mn.us>
Subject: FW: Affidavit of Service - Broos

I can't tell whether this is an appeal of an abatement order or an assessment appeal or something else. Please advise where it should go. Received today via certified mail in the Clerk's office.

Thanks.



Julie L. Tinkham
Legal Secretary
pronouns: she/her/hers
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15 W. Kellogg Blvd., Suite 750
Saint Paul, MN 55102
P: 651-266-8784
julie.tinkham@ci.stpaul.mn.us
www.StPaul.gov

From: Naylor, Racquel (CI-StPaul) <racquel.naylor@ci.stpaul.mn.us>
Sent: Wednesday, December 29, 2021 10:13 AM
To: Tinkham, Julie (CI-StPaul) <Julie.Tinkham@ci.stpaul.mn.us>
Subject: Affidavit of Service - Broos

We received the attached via certified U.S. mail.

Racquel Naylor
Saint Paul City Council
Suite 310 City Hall
15 Kellogg Boulevard West
Saint Paul, MN 55102
651-266-8573
Fax: 651-266-8574