



APPLICATION FOR APPEAL

Saint Paul City Council – Legislative Hearings

310 City Hall, 15 W. Kellogg Blvd.

Saint Paul, Minnesota 55102

Telephone: (651) 266-8585

We need the following to process your appeal:

- ☐ \$25 filing fee (non-refundable) (payable to the City of Saint Paul) (if cash: receipt number **WAIVED**)
 - ☒ Copy of the City-issued orders/letter being appealed
 - ☒ Attachments you may wish to include
 - ☒ This appeal form completed
 - ☐ Walk-In OR ☐ Mail-In
- for abatement orders only: ☒ Email OR ☐ Fax

HEARING DATE & TIME

(provided by Legislative Hearing Office)

Tuesday, **JUNE 23, 2026**

Time **REMOTE: 1PM-3PM**

Location of Hearing:

~~Room 330 City Hall/Courthouse~~

Address Being Appealed:

Number & Street: 74 Congress Street West City: St. Paul State: MN Zip: 55107

Appellant/Applicant: Brendon Smith, by counsel, Wyatt Partridge Email: wpartridge@hjlawfirm.com

Phone Numbers: Business 952-746-2192 Residence _____ Cell 612-756-4166

Signature: /s/Wyatt Partridge Date: 06/18/2026

Name of Owner (if other than Appellant): Brendon Smith

Mailing Address if Not Appellant's: 74 Congress Street West, St. Paul, MN 55107

Phone Numbers: Business _____ Residence _____ Cell 651-295-0578

What Is Being Appealed and Why?

Attachments Are Acceptable

- ☒ Vacate Order/Condemnation/Revocation of Fire C of O
- ☐ Summary/Vehicle Abatement
- ☐ Fire C of O Deficiency List/Correction
- ☐ Code Enforcement Correction Notice
- ☐ Vacant Building Registration
- ☐ Other (Fence Variance, Code Compliance, etc.)

Comments:

Please see attached.



HELLMUTH
&
JOHNSON

WRITER'S DIRECT DIAL NO.: (952) 746-2192
E-MAIL: WPARTRIDGE@HJLAWFIRM.COM

June 18, 2026

Legislative Hearings
310 City Hall
15 Kellogg Boulevard West
St. Paul, MN 55102

Re: Application for Appeal
74 Congress Street West, St. Paul, MN 55107
Our File No.: 05200.0001

To whom it may concern:

Enclosed please find an Application for Appeal and supporting documentation regarding 74 Congress Street. Please feel free to reach out with any questions. Thank you.

Very truly yours,

HELLMUTH & JOHNSON

/s/Wyatt S. Partridge

Wyatt S. Partridge
Attorney at Law

WSP/ans
Enc.

Comments:

Brendon Smith is the adult child of record owner, Thomas Charles Smith, who passed away in 2022. I am enclosing an Amended Order from Ramsey County District Court File No. 62-PR-24-469, in which Brendon was determined to be the 100% owner of all assets owned by his father, which includes 74 Congress Street. By that same order, Brendon was prohibited from deeding the property to himself due to Medical Assistance liens on the subject property. I am enclosing the correspondence with Ramsey County, which outlines Brendon's request to reduce or remove the lien. The subject property is also in foreclosure and has been listed for sale. Appellant requests that the City take no further action on this property for 180 days so that Brendon may live in the home until the redemption period ends on December 10, 2026, and / or seek to sell it during the redemption period. Please contact my office with any questions.



June 15, 2026

Current Tenant
74 Congress Street W Unit 1
Saint Paul, MN 55107-1106

FIRE INSPECTION CORRECTION NOTICE

RE: 74 Congress Street W

Property Representative:

An inspection involving your property was conducted on June 15, 2026, in response to a referral. You are hereby notified that the following deficiencies must be corrected prior to re-inspection date.

A re-inspection will be made on June 26, 2026, at 10:00 AM

Failure to comply may result in a criminal. The Saint Paul Legislative Code requires that no building shall be occupied without a Fire Certificate of Occupancy. The code also provides for the assessment of additional re-inspection fees.

1. SPLC Sec. 40.01. - Fire certificate of occupancy requirement.

(a) Owner must apply for a provisional certificate of occupancy by this date.

2. SPLC Sec. 34.23 – Structures unfit for occupancy. Property shall be vacated by June 25, 2026. A reinspection shall take place on June 26, 2026, at 10:00 AM.

Saint Paul Legislative Code authorizes this inspection and collection of inspection fees. For forms, fee schedule, inspection handouts, or information on some of the violations contained in this report, please visit our web page at: <http://www.stpaul.gov/cofo>

You have the right to appeal these orders to the Legislative Hearing Officer. Applications for appeals may be obtained at the Office of the City Clerk, 310 City Hall, City/County Courthouse, 15 W Kellogg Blvd, Saint Paul MN 55102 Phone: (651-266-8585) and must be filed within 10 days of the date of this order.

If you have any questions, email me at: keith.demarest@ci.stpaul.mn.us or call me between the hours of 7:30am and 9:00am at: (651) 266-8998. Please help to make Saint Paul a safer place in which to live and work.

Sincerely,

Keith Demarest
Fire Safety Supervisor



WRITER'S DIRECT DIAL NO.: (952) 746-2192
E-MAIL: WPARTRIDGE@HJLAWFIRM.COM

April 30, 2026

VIA EMAIL PDF ONLY

John Rominski
Ramsey County Human Services
121 7th Place East, Suite 4000
St. Paul, MN 55101
John.p.rominski@co.ramsey.mn.us

Re: 74 Congress Street, Saint Paul, MN
Our File No. 05200.0001

Dear Mr. Rominski:

Thank you for speaking with me last month about this matter. You will recall that my firm represents Brendon Michael Smith in connection with his inheritance of the home at 74 Congress Street in Saint Paul (the "Property"). Mr. Smith became the owner of the Property pursuant informal probate proceedings in 2024 after Mr. Smith's father, Thomas Charles Smith, passed away in 2022.

Mr. Smith is a 49 year-old disabled adult who has lived in the Property since 1985. The Social Security Administration determined Mr. Smith to be mentally and physically disabled in 2007. Mr. Smith has very limited records, but he has provided me with a copy of his Social Security Administration award letter that I have enclosed. Mr. Smith lives below the federal poverty level and receives Medicaid benefits and Minnesota SNAP benefits and I am enclosing documentation of his receipt of those benefits. I would also note that the SNAP benefits statement from this month shows monthly gross income of \$860.00.

Mr. Smith provided care and support to his parents, Thomas and Linda Smith (d. 2020), during their lives and during their final illnesses.

The property is subject to a Medical Assistance lien arising from Linda Smith's end-of-life care in the original amount of \$330,954.44. The Property is in foreclosure because the mortgage granted by Thomas and Linda Smith is in arrears in the amount of \$20,655.34. The foreclosure sale is scheduled for June 9, 2026. The total amount owed on the mortgage is approximately \$190,000. Mr. Smith does not have the resources to reinstate the mortgage nor redeem the Property from foreclosure. I am enclosing the notice of sheriff's sale that Mr. Smith received earlier this month.

I believe that enforcement of the Medical Assistance lien would cause Mr. Smith to undergo an undue hardship as it will prevent him from realizing the equity in the Property that Mr. Smith needs to obtain housing and medical treatment. My firm is not charging Mr. Smith anything nor claiming any lien or interest in the Property.

My firm is able to assist Mr. Smith with selling the home and completing the necessary probate work to sell the Property at arm's length if Ramsey County Human Services will release the Property and Mr. Smith from any claim to the net proceeds should he find a buyer before the end of the redemption period.

Please accept this letter as Mr. Smith's request that Ramsey County Human Services release Mr. Smith and Property from the Medical Assistance lien to avoid an undue hardship. I am available to speak with you and provide any further documentation to facilitate your review of this request.

Very truly yours,

HELLMUTH & JOHNSON

/s/Wyatt S. Partridge

Wyatt S. Partridge
Attorney at Law

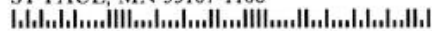
WSP/ans

Social Security Administration
Retirement, Survivors and Disability Insurance
Notice of Award

Office of Central Operations
1500 Woodlawn Drive
Baltimore, Maryland 21241-1500
Date: July 21, 2008
Claim Number: 473-15-9005HA

000908 MCSM77 NS 2.270

BRENDON M SMITH
74 W CONGRESS ST
ST PAUL, MN 55107-1106



You are entitled to monthly disability benefits beginning March 2008.

The Date You Became Disabled

We found that you became disabled under our rules on September 24, 2007.

However, you have to be disabled for 5 full calendar months in a row before you can be entitled to benefits. For these reasons, your first month of entitlement to benefits is March 2008.

What We Will Pay And When

- You will receive \$896.00 for July 2008 around August 13, 2008.
- After that you will receive \$896.00 on or about the second Wednesday of each month.
- These and any future payments will go to the financial institution you selected. Please let us know if you change your mailing address, so we can send you letters directly.
- Later in this letter, we will show you how we figured these amounts.

The day we make payments on this record is based on your date of birth.

Enclosure(s):
Pub 05-10153
Pub 05-10058

M000908 0001ADAF7003748* MCSAFPA77ADAF7R280717 FIN

LIEBO, WEINGARDEN, DOBIE & BARBEE, P.L.L.P.

ATTORNEYS AT LAW

**Suite 300
4500 Park Glen Road
Minneapolis, MN 55416**

TELEPHONE 952-925-6888

FAX 952-925-5879

NOTICE OF SHERIFF'S SALE POSTPONEMENT

April 2, 2026

Our File No. 38-25-005667

Occupants
74 Congress Street West, Unit 1
Saint Paul, MN 55107

Re: Property Address: 74 Congress Street West, Unit 1 & Unit 2
Saint Paul, MN 55107

Dear Occupant(s):

The sheriff's foreclosure sale of the above-referenced property has been postponed to June 9, 2026, at 10:00 a.m.

The date on or before which the mortgagor(s) must vacate the property if the sheriff's sale is not further postponed, the mortgage is not reinstated under section 580.30, the property is not redeemed under section 580.23, or the redemption period is not reduced under sections 582.032 or 580.07, subd. 2 is 11:59 p.m. on December 9, 2026, unless that date falls on a weekend or legal holiday, in which case it shall be the next weekday that is not a legal holiday.

Sincerely,

LIEBO, WEINGARDEN, DOBIE, & BARBEE, PLLP

**IN THE EVENT REQUIRED BY FEDERAL LAW: THIS IS A COMMUNICATION
FROM A DEBT COLLECTOR.**

State of Minnesota
EXPLANATION OF MEDICAL BENEFITS (EOMB)

FEBRUARY 28, 2026 ** REMEMBER YOU MUST SHOW YOUR ID CARD EACH TIME YOU GET SERVICES. **

RECIPIENT NAME AND ID NUMBER/ PROVIDER NAME	DATE OF SERVICE		DESCRIPTION OF SERVICE	AMOUNT PAID		AMOUNT YOU OWE	MAJOR PROGRAM	CLAIM CONTROL PROGRAM NUMBER
	START	END		BY PROGRAM				
SMITH, BRENDON	M 01212890							
HEALTHPARTNERS CENTRAL LABORAT	01/25/26	01/25/26	LAB/PATHOLOGY SERVICE	\$	15.91	\$	0.00	MA 52602900400010298
CVS PHARMACY #03313	01/29/26	01/29/26	PRESCRIBED DRUG	\$	26.86	\$	0.00	MA 32603000400019103
CVS PHARMACY #03313	02/03/26	02/03/26	PRESCRIBED DRUG	\$	13.40	\$	0.00	MA 32603500400012662

MAJOR PROGRAM

MA FEDERALLY PAID MA

THIS IS NOT A BILL

4200
RAMSEY COUNTY HUMAN SERVICES
121 7TH PL E
SAINT PAUL MN 55101-2148

9991056103721140

April 15, 2026 08:56 AM

CASE NUMBER: [REDACTED]

BRENDON M SMITH
74 CONGRESS ST W UNIT 1
SAINT PAUL MN 55107-1106

IMPORTANT INFORMATION REGARDING THIS DOCUMENT:

- * This information is available in other forms to people with disabilities by calling your county worker, STEPHANIE F. at (651) 266-3718.
 - * For TTY/TDD users, contact your county worker through the Minnesota Relay at 711 or (800) 627-3529. For the Speech-to-Speech Relay, call (877) 627-3848.
 - * The back of this page lists your appeal rights and responsibilities.
-

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP) NOTICE OF DECISION

Beginning April 01, 2026, your SNAP will change from \$0.00 to \$298.00. You will get a prorated SNAP amount of \$298.00 for April 01, 2026 through April 30, 2026 because:

We reopened your case. (Auth:5,7)
Gross earned income changed from \$0.00 to \$860.00.
Allowed shelter costs changed from \$0.00 to \$400.00.
Allowed utility costs changed from \$0.00 to \$667.00.
The number of eligible members in your household changed from 0 to 1.

State of Minnesota
Ramsey County

District Court
Second Judicial District
Court File Number: 62-PR-24-469
Case Type: Informal Probate

In re the Estate of Thomas Charles Smith,
Decedent

AMENDED
Order of Informal Appointment of
Personal Representative
(Without a Will)

The Application for the Informal Appointment of Personal Representative, which was signed by Brendon Michael Smith, came before the Registrar on July 16, 2024.

Having considered the Application, the Registrar determines the following:

1. The Application is complete.
2. The Applicant has declared or affirmed that the information in the Application is true to the best of Applicant's knowledge or belief.
3. The Applicant appears to be an "interested person" as defined by Minnesota law.
4. Venue in this County is proper based on the statements in the Application.
5. The Application indicates the following:
 - a. The Applicant conducted a reasonably diligent search for any unrevoked testamentary instrument.
 - b. The Applicant is not aware of any unrevoked testamentary instrument.
 - c. There is no Personal Representative appointed in this or another county in Minnesota whose appointment has not been terminated.
 - d. The person appointed below has priority, is entitled to be appointed Personal Representative, and is not disqualified to serve as Personal Representative.
6. The requested appointment does not relate to any Will.
7. Any notice required by Minnesota law has been given.
8. The Decedent died on July 22, 2022 and at least 120 hours, but not more than 3 years (except as allowed in Minn. Stat. § 524.3-108), have passed since Decedent's death.
9. The Decedent's heir and interest is:

Brendon Michael Smith – Son – 100% Interest

10. All persons identified as heirs under Minnesota law have survived the Decedent by at least 120 hours.

11. The following checked statements are true:

- ☒ Decedent left no surviving spouse.
- ☐ Decedent left no surviving descendants.
- ☐ All descendants of Decedent are descendants of Decedent's surviving spouse.
- ☐ There are descendants of Decedent that are not descendants of Decedent's surviving spouse.
- ☐ There are descendants of the surviving spouse who are not descendants of the Decedent.

IT IS ORDERED:

1. The application is granted.
2. Brendon Michael Smith is informally appointed as Personal Representative of Decedent's Estate, with no bond.
3. **Restriction:** No transfer of real property shall occur without a Certificate of Clearance for Medical Assistance.

BY THE COURT:

July 16, 2024

Date

Probate Registrar