



**CITY OF SAINT PAUL**  
OFFICE OF THE CITY COUNCIL  
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Marcia Moermond, Legislative Hearing Officer  
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June 22, 2022

Matthew Lindquist  
Jim Lindquist

Jerad Rasmussen

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Re: Rent Stabilization Determination appeal for property at 1029 Raymond Avenue

Dear Interested Parties:

This is to confirm that at the Legislative Hearing on June 21, 2022 Legislative Hearing Officer Marcia Moermond laid the matter over to **Legislative Hearing on Tuesday, June 28, 2022 at 3:00 p.m. in room 330 City Hall** for further discussion.

As discussed in the hearing, any information related to the following items can be sent to me at [Joanna.zimny@ci.stpaul.mn.us](mailto:Joanna.zimny@ci.stpaul.mn.us) :

1. Clarification of ownership and title of property, in particular the deed appearing to be a “trustee” versus a “warranty” deed – looking for confirmation Winter Trust no longer in any ownership position;
2. Anticipated rate of return for 2022 with and without rent increase – please include the means by which this is calculated;
3. Unit by unit information on completed and proposed improvements with schedule, as well as those with building/property-wide impacts;
4. Information on increases in occupancy (or anticipated increases) by unit which could result in 15% increase in rent allowable for that unit above the rent increase requested for all units; and
5. Additional information/substantiation on answers to Section XXB & C questions in MNOI worksheet, where you indicated the following:

B. Exceptional Circumstances in the Base Year. The gross income during the base year was disproportionately low due to exceptional circumstances. In such instances, adjustments may be made in calculating base year gross rental income consistent with the purpose of analyzing base year net operating income. Check which factor(s) contributed to your claim:

- (i) The gross income during the base year was lower than it might have been because some residents were charged reduced rent.
- (ii) The gross income during the base year was significantly lower than normal because of the destruction of the premises and/or temporary relocation for construction or repairs.
- (iii) The pattern of rent increases in the years prior to the base year were less than increases in the CPI.
- (iv) Base year rents were disproportionately low in comparison to the base year rents of comparable rental units in the City of Saint Paul.
- (v) Other exceptional circumstances

**[Petitioners submitting a claim based on this factor may be required to pay for an independent appraisal by an appraiser approved by the City].**

C. Explanation for Basis in Support of Claim for Adjustment of Base Year Rent.

A passive, hands off heir inherited a building debt free. For that reason the building was run poorly.  
No rent increases, vacancy, general mismanagement due to no debt costs.

Ms. Moermond anticipates that this information will suffice in making her findings and recommendations on your appeal to the City Council. However, as indicated in the Legislative Hearing, there may be additional questions or clarification needed in her review of the information, or by you in gathering it. She intends to provide space for properly examining those issues, as they arise.

Finally, although you indicated in the hearing that much of the above already existing information would be easily assembled and transmitted, it is understood that may not be the case for all of the information. As indicated previously, this is an interactive process and communication is expected to continue following the hearing to allow for as much opportunity as possible for you to present your case.

If you have any questions, please contact me at 651-266-8585.

Sincerely,

/s/

Joanna Zimny

Legislative Hearing Executive Assistant

c: Rent Stabilization Staff  
Walter Battle, HJC MN via email: [wbattle@hjcmmn.org](mailto:wbattle@hjcmmn.org)