APPLICATION FOR APPEAL

Saint Paul City Council – Legislative Hearings

RECEIVED
AUG 05 2026
CITY CLERK

310 City Hall, 15 W. Kellogg Blvd.
Saint Paul, Minnesota 55102
Telephone: (651) 266-8585
legislativehearings@ci.stpaul.mn.us

We need the following to process your appeal:

- ☐ $25 filing fee (non-refundable) (payable to the City of Saint Paul) (if cash: receipt number_____)
  All fees waived for appeals
- ☒ Copy of the City-issued orders/letter being appealed & any attachments you may wish to include
- ☒ Walk In ☐ Mail ☐ Email

Appeal taken by: Naylor

HEARING DATE & TIME
(provided by Legislative Hearing staff)
Tuesday, August 11, 2026
Location of Hearing:

- ☒ **Telephone:** *you will be called between* 2:00 p.m. & 4:00 p.m.
- ☐ **In person** *(Room 330 City Hall)* **at:** _____
  (required for all condemnation orders and Fire C of O revocations and orders to vacate)

Address Being Appealed:

Number & Street: 368 Front Ave City: Saint Paul State: MN Zip: 55117

Appellant/Applicant: Peter Larsen Email: Peter@larsenmortgages.com

Phone Numbers: Business 651-341-9854 Residence 651-341-9854 Cell 651-341-9854

Signature: _____ Date: 08/05/2026

Name of Owner (if other than Appellant): Peter Larsen and Annika O'Brynes

Mailing Address if Not Appellant's: 952 Palace Ave Saint Paul MN 55102

Phone Numbers: Business 651-341-9854 Residence 651-341-9854 Cell 651-341-9854

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 — I need more time to make these repairs. I am in a lawsuit with the co-owner and the bid for the Furnace came in at 22k. I need time to get the money togeather.
- ☐ Code Enforcement Correction Notice
- ☐ Vacant Building Registration
- ☐ Other (Fence Variance, Code Compliance, etc.)

SAINT PAUL
SAFETY & INSPECTIONS

Fire Inspection Report

City of Saint Paul
Department of Safety and Inspections
375 Jackson Street - Suite 220
Saint Paul MN 55101-1806

Owner Name	Peter Larson	License	
Owner Address	952 Palace Ave	Complaint	No Entry Reinspection
City State Zip	Saint Paul, MN 55102	C of O	
Owner Phone	(651) 341-9854	Date	07/30/2026

Building Address: 368 Front Ave

You are hereby notified to remedy the conditions stated below immediately. A reinspection will be made after the reinspection date stated below. If you consider any of these code requirements to be unreasonable, you may appeal to the Legislative Hearing Officer. Applications for appeals may be obtained at the City Clerk's Office, 310 City Hall, phone: 651-266-8585, within 10 days of the date of the original orders.

Code	Conditions to be Corrected
	These correction orders have been modified.
SPLC 34.10(7)	First floor bedroom has chipping and peeling paint on walls and ceiling. Repair and maintain in a professional state.
SPLC 34.09(4)	The first floor bedroom window cannot keep itself open. Repair and maintain the window so it can hold itself open without any special tools or knowledge.
MSFC 1103.8.1	Smoke alarms missing or expired in multiple areas, including outside the first floor bedroom, outside the bedrooms on the second floor, inside one of the bedrooms on the second floor, and in the basement. Replace all smoke alarms with current ones of the same power supply as before.
MSFC 1103.9	The carbon monoxide alarm on the second floor is not mounted in place.
MSFC 603.1	Fire Department reports high levels of carbon monoxide, possibly from furnace or water heater. Have appliances inspected by licensed contractor and repair affected areas. THIS WORK MAY REQUIRE PERMITS. CONTACT DSI AT (651) 266-8989 FOR MORE INFORMATION.
MSFC 604.1	The front porch has an outlet that is not protected from the elements. The front porch light fixture is missing its protective globe. Repair electrical hazards in an approved manner.
SPLC 40.07	Allow access for the inspector to all areas of the building for purposes of conducting a reinspection. Questions or concerns? Call Jack Harrington at (651) 266-9142 or email jack.harrington@ci.stpaul.mn.us

Owner or Representative Signature _____

Occupancy Type	SFH	Inspector Signature	Jack Harrington Digitally signed by Jack Harrington Date: 2025.07.30 16:48:52 -05'00'
CFO Key		Reinspection Date	08/31/2026
		Time	10:30 am

** For further information on this report, contact the Fire Inspection Division at 651-266-8989 **

STATE OF MINNESOTA **DISTRICT COURT**

COUNTY OF RAMSEY **SECOND JUDICIAL DISTRICT**

Court File No.:_____

Case Type: Civil

In re: 1103 Oak Street, LLC

Annika O Byrnes,

Plaintiff,

SUMMONS.

v.

Peter Larsen,

Defendant.

THIS SUMMONS IS DIRECTED TO THE ABOVE-NAMED DEFENDANT:
952 Palace Ave, St. Paul MN, 55102.

1. **YOU ARE BEING SUED.** The Plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is on file in the office of the court administrator of the above-named court. Do not throw these papers away. They are official papers that affect your rights. You must respond to this lawsuit even though it may not yet be filed with the Court and there may be no court file number on this Summons.

2. **YOU MUST REPLY WITHIN 21 DAYS TO PROTECT YOUR RIGHTS.** You must give or mail to the person who signed this summons a **written response** called an Answer within 21 days of the date on which you received this Summons. You must send a copy of your Answer to the person who signed this Summons located at:

John G. Westrick
Savage Westrick, PLLP
900 American Blvd. E., Ste. 241
Bloomington, MN 55420
PH: (651) 292-9603
westrick@savagewestrick.com

3. **YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to the Plaintiff's Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.

4. **YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS SUMMONS.** If you do not answer within 21 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award the

Plaintiff everything asked for in the Complaint. If you do not want to contest the claims stated in the Complaint, you do not need to respond. A default judgment can then be entered against you for the relief requested in the Complaint.

5. **LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. **Even if you cannot get legal help, you must still provide a written Answer to protect your rights, or you may lose the case.**

6. **ALTERNATIVE DISPUTE RESOLUTION.** The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written response to the Complaint even if you expect to use alternative means of resolving this dispute.

SAVAGE WESTRICK, P.L.L.P

Dated: July 23, 2026

/s/ John G. Westrick
John G. Westrick (#206581)
900 American Blvd., E., Ste. 241
Bloomington, MN 55420
Ph: (651) 292-9603
Fax: (651) 395-7423
westrick@savagewestrick.com
Attorney for Plaintiff

STATE OF MINNESOTA	**DISTRICT COURT**
	SECOND JUDICIAL DISTRICT
COUNTY OF RAMSEY	Court File No.
	Case Type:

In re: 1103 Oak Street, LLC

Annika O Byrnes,

Plaintiff,

v.

COMPLAINT

Peter Larsen,

Defendant.

Comes now Plaintiff Annika O'Byrnes, as and for her complaint against Peter Larsen, the Defendant, states and alleges as follows:

1. 1103 Oak Street, LLC (hereinafter "The Company") is a duly-formed limited liability company organized under the laws of The State of Minnesota, with its date of organization on or about December 14, 2021. Its principal place of business is 952 Palace Ave, St. Paul MN, 55102.
2. Annika O'Byrnes (hereinafter "O'Byrnes") is a member of the Company and further serves as Vice President and Secretary.
3. Peter Larsen (hereinafter "Larsen") is a member of the Company and further serves as Chief Manager/President and Chief Financial Officer/Treasurer.

4. The Company currently operates investment and rental real estate in Minnesota as follows:

A. A duplex in Crow Wing County legally described as:

CHENEY N MOSHERS SUBDIVISION OF BLOCK 2, Lot 006, Block 021

and commonly described as 1103 Oak Street, Brainerd, Minnesota 56401.

B. A residential property in Ramsey County legally described as:

Lot 4, Block 1, except the Westerly 60 feet thereof, Robert A. Smith's Rearrangement of Lots 1, 2, 3, 4, 5, 6, and 7 of Wilkin and Hayward's Outlots to St. Paul, Minnesota, Ramsey County, Minnesota.

and commonly described as 368 Front Ave, St. Paul, Minnesota 55117; and

C. A residential property in Anoka County legally described as:

Lot 5, Block 4, Orrin Thompson's Park River Estates 3rd, Anoka County, Minnesota.

and commonly described as 1478 97th Ave NW, Coon Rapids, Minnesota 55433.

5. The Crow Wing County real estate is not titled in the Company but in Larson's (misspelled as "Larsen" on the deed) name. However, that property has been utilized and managed as Company property since its acquisition.

6. The Ramsey County real estate is titled in the names of the members individually, as tenants in common. However, that property has been utilized and managed as Company property since its acquisition.

7. The Anoka County real estate is titled in the name of the Company.

8. The Crow Wing County real estate has approximately $94,278 in owner's equity.

9. The Ramsey County real estate has approximately $77,858 in owner's equity.

10. The Anoka County real estate has approximately $73,598 in owner's equity.

11. Dissolution is required because it is not reasonably practical to carry on the Company's activity in conformity with the articles of organization and operating agreement because the members are in a deadlock regarding the management and continuation of The Company.

12. Moreover, Plaintiff O'Byrne is directly harmed by the inability of at least one of the Company's real estate properties to cash flow, causing the Company to approach insolvency.

WHEREFORE, Plaintiff Annika O'Byrnes requests that this Court order:

a) That the Company be dissolved;

b) That the wind-up of the Company be Court-supervised; and

c) Any such related relief the Court deems necessary.

SAVAGE WESTRICK, P.L.L.P

Dated: July 23, 2026

/s/ John G. Westrick
John G. Westrick #206581
900 American Blvd., E., Ste. 241
Bloomington, MN 55420
Ph: (651) 292-9603
Fax: (651) 395-7423
westrick@savagewestrick.com
Attorney for Plaintiff

ACKNOWLEDGMENT REQUIRED BY MINN. STAT. § 549.211

The undersigned hereby acknowledges that costs, disbursements, and reasonable attorney and witness fees may be awarded to the opposing party or parties in this litigation if the Court should find that the undersigned or its client acted in bad faith; asserted a claim or defense that is frivolous and that is costly to the other party; asserted an unfounded position solely to delay the ordinary course of the proceedings or to harass; or committed a fraud upon the Court.

SAVAGE WESTRICK, P.L.L.P

Dated: July 23, 2026.

/s/ John G. Westrick
John G. Westrick #206581

RESIDENTIAL HEATING
& Air Conditioning Inc.

612-724-1899

Residential Heating & Air Conditioning Inc.

ESTIMATE	#6791
ESTIMATE DATE	Jul 15, 2026
SERVICE DATE	Jul 15, 2026
TOTAL	$22,000.00

Peter Larsen
952 Palace Ave
Saint Paul, MN 55102

(651) 341-9854
Peter@larsenMortgages.com

SERVICE ADDRESS

368 Front Ave
Saint Paul, MN 55117

CONTACT US

7454 Washington Ave S
Eden Prairie, MN 55344

(612) 724-1899
info@resheatandair.com

Service completed by: Chris Kallstrom

ESTIMATE

Option #1

Service completed by: Chris Kallstrom

Office - Free Estimate Furnace, AC, or Both- both System Functioning-no Age- 100 How soon are you looking to replace- asap	1.0
Good-Carrier 80% 70,000 BTU Single Stage Furnace Remove, Reclaim and dispose of existing furnace. Install new furnace, reconnect to existing Supply/Return plenum, gas line, chimney flue, thermostat & condensate drain. New 20x25x1 filter boot. -80% Efficient - Single Stage gas valve -Fixed Speeds, Constant Torque (FCT) ECM blower motor - QuieTech noise reduction system - Microprocessor based control center - Enhanced diagnostics with LED and reflective sight glass - Stores fault codes during power outages - Adjustable heating air temperature rise - Adjustable cooling airflow - Power Heat Igniter - Draft safeguard switch designed to ensure proper furnace venting - Inner door for tighter sealing DxWxH (inches) 29 x 14-3/16 OR 17.5 x 33-1/3 #SB0	1.0
Good-Carrier 2 Ton 14+ Seer2 , Central Air Includes Pad, evaporator coil, condenser, new condensate drain hose, permit, and duct modification for new coil. Reclaim refrigerant and disposal of old equipment. Reconnect electrical by licensed electrician. Clean up all materials and debris. Electrical connections to new equipment only, not responsible for electrical code compliance. Any home modifications (i.e carpentry, patching etc) is not included. #SCA	1.0
Parts & Labor Warranty	1.0

*10 Years Parts
*1 Years Labor
*20 Years Heat Exchanger (Parts Only)

** Pending required yearly maintenance performed by Residential Heating & Air Conditioning.

Custom Job	1.0

Install new ductwork in basement after furnace and ductwork are removed by licensed abatement contractor. Reconnect to existing ductwork running up walls to second floor.

Terms & Conditions	1.0

Terms & Conditions:
Work is limited to equipment and materials listed on the approved proposal. Customer is responsible for code-compliant electrical service and property conditions; Residential Heating & Air Conditioning is responsible only for final equipment connections specified. Cancellation after equipment is ordered is subject to a 20% restocking fee. We do not perform asbestos or hazardous material abatement. No carpentry, painting, patching, refinishing, or cosmetic repairs are included. Minor incidental blemishes from normal work are not considered damage. Manufacturer warranties apply as issued; company labor warranties require annual maintenance by Residential Heating & Air Conditioning and a current account balance. Invoices unpaid after 30 days may void company labor warranties. Rebates are administered by third parties; approval, funding, and terms are not guaranteed.

Services subtotal: $22,921.00

Subtotal	$22,921.00
Past customer	- $921.00
Total	**$22,000.00**

Thank you for the opportunity to service your HVAC needs!
All NEW EQUIPMENT Installations and repairs require a 50% down payment & Final 50% on date of install.
All Extended Warranties (10-12 Year Labor) on new equipment REQUIRE Yearly Maintenance with Residential Heating and Air solely. By accepting the estimate for NEW EQUIPMENT (not repairs) you agree to have Residential Heating and Air complete manufacturer recommended maintenance.