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October 5, 2016

**VIA EMAIL ONLY**

Ms. Shari Moore  
St. Paul City Clerk  
310 City Hall and Court House  
15 West Kellogg Blvd.  
St. Paul, MN 55102

Re: Objection to 2016 ROW Assessment  
Hillcrest Investments, LLC. d/b/a Hillcrest Country Club  
2200 Larpenteur Avenue East, St. Paul, Minnesota, 55109  
PIDS: 23-29-22-14-0002  
23-29-22-41-0001  
23-29-22-41-0002  
23-29-22-12-0003

Dear Ms. Moore:

This office represents Hillcrest Investments, LLC. d/b/a Hillcrest Country Club ("Hillcrest"), the owner of the property and parcels identified above. Please consider this letter a written formal objection by Hillcrest to the right of way assessments that the St. Paul City Council plans to adopt for 2016 for the above referenced parcels. This objection is based on the grounds stated in the recent Supreme Court Opinion *First Baptist Church of St. Paul, et al., v. City of St. Paul* (A15-0015) (August 24, 2016). Namely, the assessment is deemed a tax and the amount of the assessment exceeds the special benefits to Hillcrest's property. If you have any questions, please feel free to call.

Sincerely,

  
Laura H. Lindsay