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ATTORNEY

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MEMO

To: Mayor Melvin Carter and Ms. Shari Moore, St. Paul City Clerk

CC: Ferd Peters

From: Jack Hoeschle

Date: May 17, 2021

Re: Objection to CY 2019 and 2020 SMSP Mill and Overlay Assessment Fees

Please accept this notice, pursuant to our earlier agreement regarding electronic service, as the formal objection of the taxpayers listed on Exhibit A as to those properties as well as any other properties owned by those taxpayers and/or their affiliates regarding the 2019 and 2020 SMSP Mill and Overlay fees and assessments billed and to be levied against their properties by the City Council on May 19, 2021. These taxpayers also object to any fees previously paid pursuant to City Invoices.

These taxpayers believe that this work does not cause any special benefit to their properties and the charges are based on mistakes of law and fact by the City.

Among others, the resolutions complained of include:

RES PH 21-85 - Downtown

RES PH 21-79 - Downtown

RES PH 20-88 - Downtown

RES PH 21-81 – Mississippi River Blvd

RES PH 20-92 - Prior

RES PH 20-72 - Arlington

EHIBIT A

| Downtown Mill and Overlay | | |
|---|-------------------------------------|------------------|
| Taxpayer | Property Address | PIN |
| 178 RP LLC | 178 9th St. E | 31-29-22-43-1566 |
| Atlas Group LLC | 187 7th PLE | 31-29-22-44-0032 |
| Atlas Group LLC | 189 7th Pl E | 31-29-22-44-0096 |
| Bigos Galtier | 380 Jackson St | 31-29-22-44-0443 |
| Bigos Galtier | 174 6th St E | 31-29-22-44-0894 |
| Bigos Jackson | 174 6th St E | 31-29-22-44-0523 |
| Bigos Jackson Tower LLC | 0 Jackson St | 31-29-22-44-0611 |
| Bigos Lowertown Lofts LLC | 240 5th St E | 31-29-22-44-0098 |
| Bigos Mears Park LLC | 401 Sibley St | 31-29-22-44-0058 |
| Bigos Sibley Tower LLC | 172 6th St E | 31-29-22-44-0108 |
| Bigos St Paul Housing Group | 174 6th St E | 31-29-22-44-0107 |
| Center Ice Mb LLC | 235 6th St E | 31-29-22-44-0898 |
| Church of St. Mary | 466 Wacouta | 31-29-22-44-0003 |
| Donerly, Inc. | 215 10th St E | 31-29-22-42-0112 |
| Donerly, Inc. | 80 10th St. E. | 31-29-22-43-0031 |
| Donerly, Inc. | 81 9th St. E | 31-29-22-43-0032 |
| First Baptist Church of St. Paul | 0 Wacouta St | 31-29-22-41-0024 |
| First Baptist Church of St. Paul & | | 31 23 22 11 0021 |
| Congregation | 499 Wacouta | 31-29-22-41-0182 |
| Greenspace Rentals LLP | 170 7th Pl E | 31-29-22-44-0059 |
| Heritage House Senior Apartments | 202 7th St E | 31-29-22-44-0052 |
| Heritage House Senior Apartments | 218 7th St E | 31-29-22-44-0518 |
| Nguyen Holding LLC | 170 10th St E | 31-29-22-43-0009 |
| Nguyen Holding LLC | 172 10th St E | 31-29-22-43-0010 |
| Ree Lowertown LLC | 300 4th St E | 32-29-22-33-0046 |
| Ree Parkside LLC | 250 5th St E | 31-29-22-44-0082 |
| St. Paul Exchange LLC/Drury Southwest | 175 10 th St. E | 31-29-22-42-0003 |
| St. Paul Exchange LLC/Drury Southwest | 175 10 th St E | 31-29-22-42-0004 |
| Winifred Partners LLC | 259 9th St E | 31-29-22-41-0217 |
| Winifred Partners LLC | 466 Wacouta St | 31-29-22-44-0002 |
| | | |
| Mississippi River Blvd Mill and Overlay | | |
| Taxpayer | Property Address | PIN |
| Larry and Mary McIntyre | 208 Miss. Riv. Blvd N | 05-28-23-34-0005 |
| Saint Germain Foundation | 220 Miss. Riv. Blvd N | 05-28-23-21-0002 |
| Prior Avenue Mill and Overlay | | |
| Taxpayer | Property Address | PIN |
| Joseph Clancy | 1950 Selby Ave | 04-28-23-22-0104 |
| Richard Lemanczykafka | 1946 Selby Ave | 04-28-23-22-0118 |
| Prior Avenue Mill and Overlay | | |
| Taxpayer | Property Address | PIN |
| Paris Vener | 1449 Arlington Ave. E | 22-29-22-24-0147 |
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