

EXHIBIT PACKET

Exhibits A through H

Formal Complaint — City Council and DSI/Zoning — Saint Paul, MN
Property at Issue: 285 George Street West, Saint Paul, MN (B2 Business District)
Submitted by: 279 George Street West, Saint Paul, MN 55107

NOTE: All photographs and videos in this packet are a small representative sample of more than 500 documented incidents. The full collection is available upon request and will be produced in any formal proceeding or legal action.

Exhibit	Description	Date Range
A	Commercial delivery vehicles — illegal parking / street blocking	2023–2026
B	Trespassing / private driveway blocking	Dec 2021–Jul 2026
C	Illegal parking on posted No Parking street / driveway blocking	Nov 2022–Jul 2026
D	Off-hours noise / loading activity	Apr 2025–Jun 2026
E	Fence and screening condition	Nov 2025
F	Ramsey County Assessor — property value reduction	2025 Assessment
G	Property damage to fence	Aug 2024
H	Official correspondence — city/county acknowledgment	Dec 2022 / Apr 2024

EXHIBIT A

Commercial Delivery Vehicles — Illegal Parking / Street Blocking

Exhibit A-1

Multiple dates — Large commercial vehicles — illegal parking / street blocking

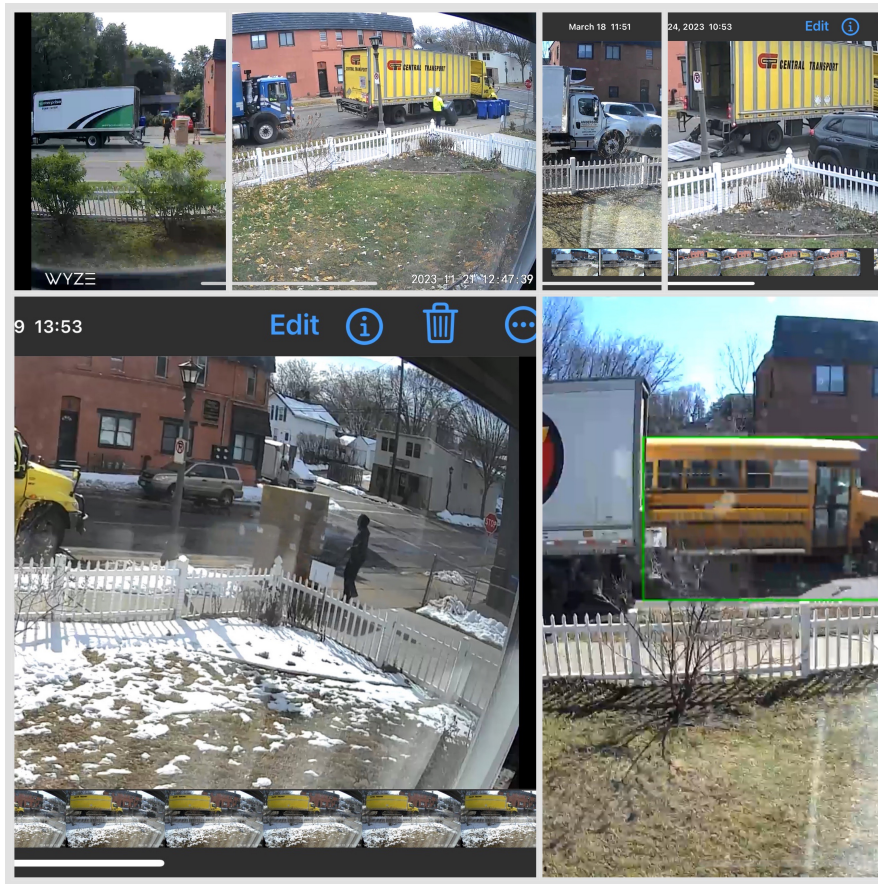


Exhibit A-2

November 24, 2023, 10:53 AM — Illegal parking / street blocking — police vehicle drives past without stopping

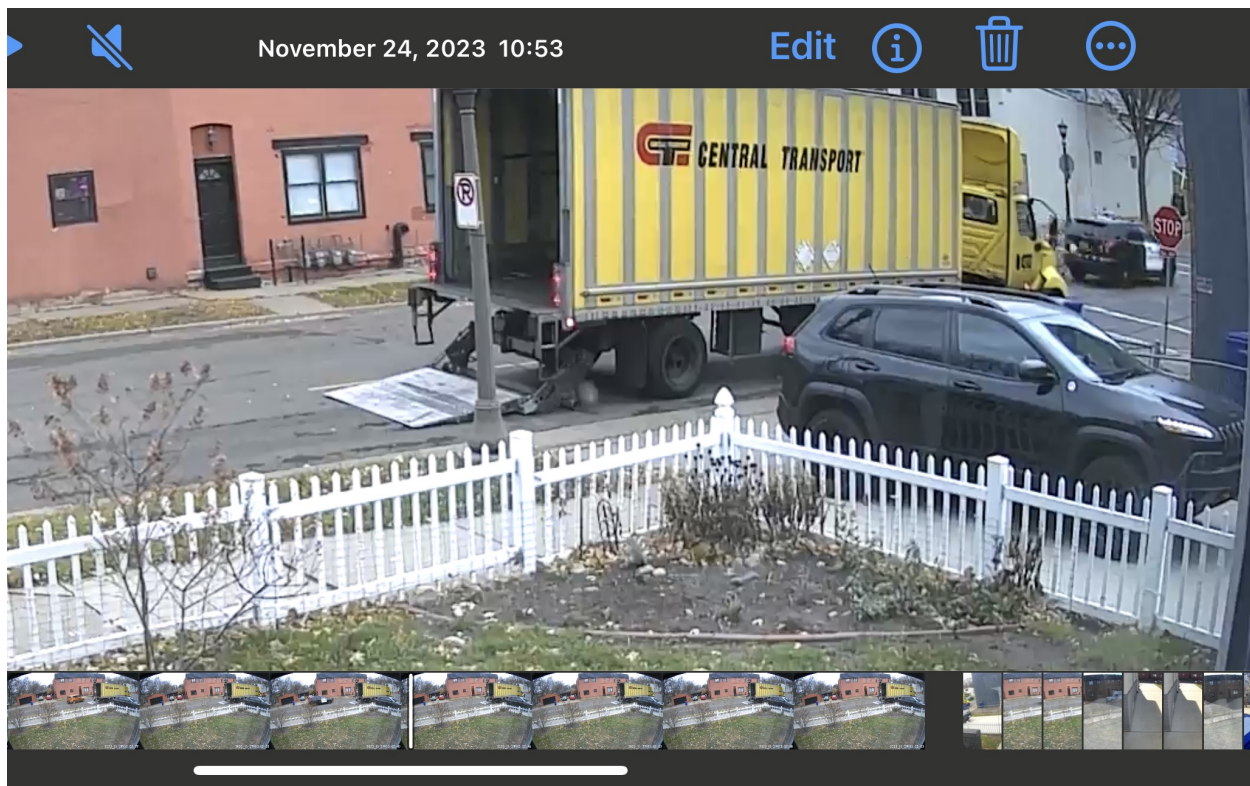


Exhibit A-3

August 22, 2023, 10:58 AM — Illegal parking / street blocking



Exhibit A-4

July 24, 2026, 10:04 AM — Illegal parking / street blocking — same carrier as A-2



Ordinance: No Parking zone violation; off-street loading requirement

EXHIBIT B

Trespassing / Private Driveway Blocking — Despite Posted Signage

NOTE: Sample only — 500+ total documented incidents on file.

Exhibit B-1

December 18, 2021, 2:02 PM — Trespassing / driveway blocking



Exhibit B-2

December 23, 2021, 5:47 PM — Trespassing / driveway blocking



Exhibit B-3

January 21, 2022, 5:59 PM — Trespassing / driveway blocking

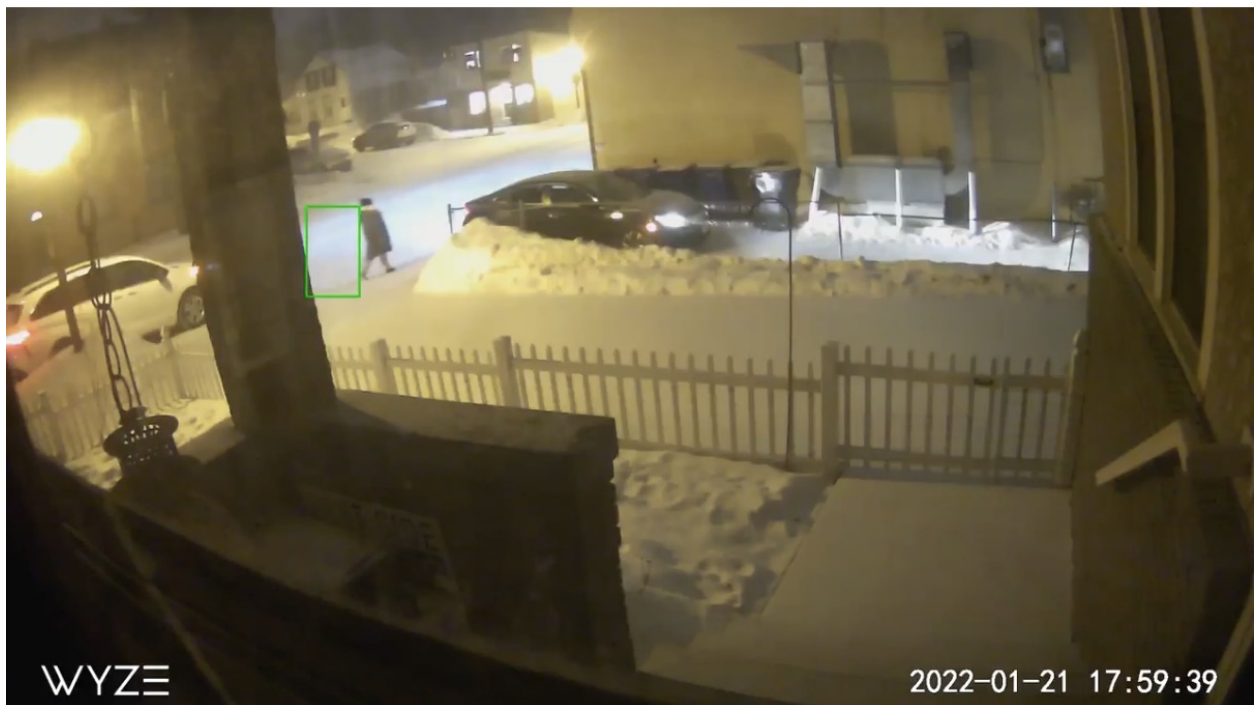


Exhibit B-4

February 13, 2022, 1:02 PM — Trespassing / driveway blocking — multiple vehicles



Exhibit B-5

February 26, 2022, 2:22 PM — Trespassing / driveway blocking



Exhibit B-6

March 5, 2022, 4:24 PM — Trespassing / driveway blocking



Exhibit B-7

March 11, 2022, 1:15 PM — Trespassing / driveway blocking



Exhibit B-8

January 14, 2022, 3:11 PM — Trespassing / driveway blocking — resident blocked in

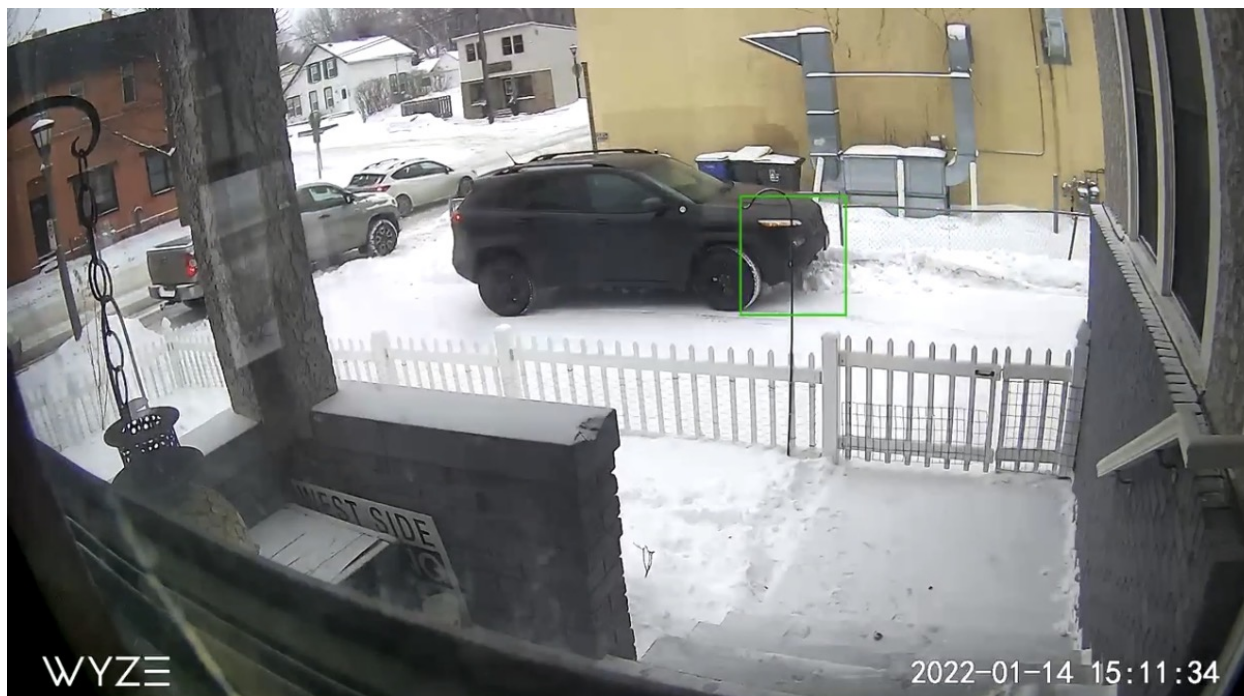


Exhibit B-9

June 26, 2022, 4:30 PM — Trespassing / driveway blocking



Exhibit B-10

July 3, 2022, 2:51 PM — Trespassing / driveway blocking — multiple vehicles



Exhibit B-11

June 7, 2026, 1:50 PM — Trespassing / driveway blocking



Exhibit B-12

June 20, 2026, 9:56 AM — Trespassing / driveway blocking



Exhibit B-13

April 19, 2026, 1:15 PM — Trespassing / driveway blocking — multiple vehicles



Exhibit B-14

June 20, 2026, 9:56 AM — Trespassing / driveway blocking



Exhibit B-15

July 4, 2026, 2:04 PM — Trespassing / driveway blocking



Exhibit B-16

July 11, 2026, 4:17 PM — Trespassing / driveway blocking



Exhibit B-17

Current condition — Posted 'No Trespassing' and 'No Parking in Driveway' signage



Ordinance: Trespass; Sec. 63.310 — driveway separation required

EXHIBIT C

Illegal Parking on Posted No Parking Street / Driveway Blocking

NOTE: Sample only — 500+ total documented incidents on file.

Exhibit C-1

June 24, 2022, 5:11 PM — Illegal parking / driveway blocking



Exhibit C-2

June 24, 2022, 5:15 PM — Police vehicle drives past — no enforcement action



Exhibit C-3

July 16, 2022, 1:00 PM — Illegal parking / driveway blocking — multiple vehicles



Exhibit C-4

July 16, 2022, 7:04 PM — Illegal parking / driveway blocking



Exhibit C-5

November 24, 2022, 12:43 PM — Illegal parking / driveway blocking — Thanksgiving



Exhibit C-6

June 15, 2024, 10:07 AM — Illegal parking on No Parking street / driveway blocking



Exhibit C-7

June 21, 2026, 10:20 AM — Illegal parking on No Parking street / driveway blocking



Exhibit C-8

June 21, 2026, 12:25 PM — Illegal parking on No Parking street / driveway blocking



Exhibit C-9

July 4, 2026, 1:25 PM — Illegal parking / driveway blocking



Ordinance: No Parking zone violation; Sec. 63.310 — driveway separation required

EXHIBIT D

Off-Hours Commercial Activity / Noise — After 10:00 PM Cutoff

Exhibit D-1

April 12, 2025, 1:38 AM — Off-hours commercial activity / noise



Exhibit D-2

November 29, 2025, 12:00 AM — Off-hours commercial activity / noise



Exhibit D-3

November 29, 2025, 12:37 AM — Off-hours commercial activity / noise — continued 37 min later



Exhibit D-4

May 27, 2026, 11:28 PM — Off-hours commercial activity / noise

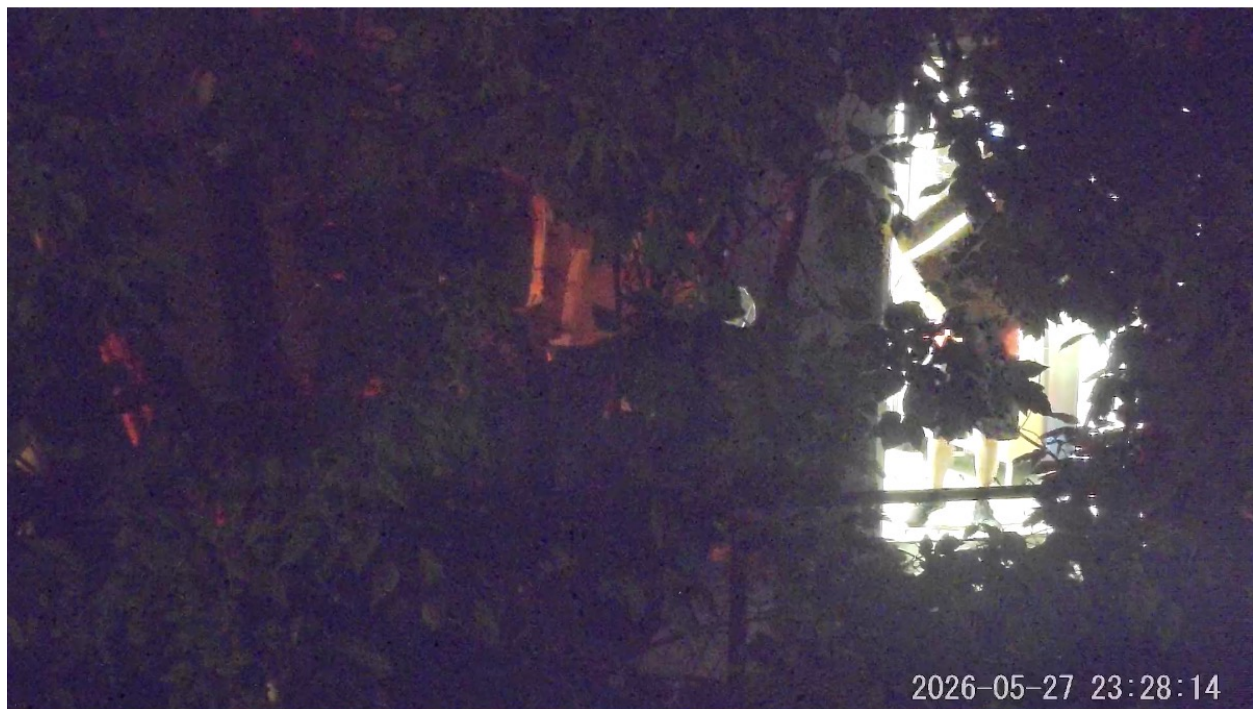


Exhibit D-5

June 15, 2026, 1:27 AM — Off-hours commercial activity / noise



Ordinance: Legislative Code Sec. 293.07 — 55 dBA limit after 10:00 PM in residential district

EXHIBIT E

Fence and Screening Condition — Non-Compliant

Exhibit E-1

November 30, 2025, 3:43 PM — Non-compliant fence — no opacity or screening



Ordinance: Sec. 63.114 — visual screen required; Minn. Rules 2400.2630 — opaque barrier required

Relevant to: documented financial harm from ongoing violations

EXHIBIT G

Property Damage — Vehicle Backed Into Resident's Fence

Exhibit G-1

August 4, 2024, 3:46 PM — Property damage — witnessed by business owners



Relevant to: direct property damage; potential civil claim

EXHIBIT H

Official Correspondence — Named City and County Officials

H-1: December 27, 2022 — Officer Shawn Filiowich, Central District Code Enforcement, acknowledges ongoing violations at 285 George St W, states enforcement 'does not seem to be helping,' and confirms he is seeking 'a more permanent solution.' Copied to City Council Member Rebecca Noecker and Jesse Mollner (CI-StPaul).

H-2: April 15, 2024 — Ken Iosso, Principal Aide to Ramsey County Commissioner Rafael E. Ortega, confirms: 'parking enforcement will invest solid time on your street in the coming weeks, which could include citations and should raise awareness for customers about the need to comply with parking regulations.' Officer Filiowich confirms in the same chain that he met with the business ownership again on April 11, 2024. Relevant excerpt shown below.

NOTE: Only the portion of Exhibit H-2 relevant to parking enforcement and official acknowledgment of violations is reproduced here. The property owner's complaints have at all times concerned specific ordinance violations — illegal parking, driveway obstruction, off-hours loading/unloading noise, trespass, and absence of required screening.



jodi bushard <jodirb8@gmail.com>

285 George St W

Iosso, Ken <ken.iosso@co.ramsey.mn.us>

Mon, Apr 15, 2024 at 14:11

To: Shawn Filiowich <shawn.filiowich@ci.stpaul.mn.us>, jesse.mollner@ci.stpaul.mn.us
<jesse.mollner@ci.stpaul.mn.us>

Cc: jodirb8@gmail.com <jodirb8@gmail.com>

Thank you, Shawn, for your time this afternoon. I learned a lot.

Jodi, it sounds like parking enforcement will invest solid time on your street in the coming weeks, which could include citations and should raise awareness for customers about the need to comply with parking regulations.

Relevant to: documented notice to named officials; parking enforcement commitment confirmed in writing April 2024; business ownership personally notified by city officers multiple times; violations continued unabated for more than two years after this correspondence.