

February 2, 2026

Marcia Moermond
Legislative Hearing Officer
City of Saint Paul
Office of the City Council
310 City Hall
15 West Kellogg Boulevard
Saint Paul, MN 55102-1615

Email: legislativehearings@ci.stpaul.mn.us

Re: Appeal for property at 873 Front Avenue

Dear Ms. Moermond:

My clients have asked that I submit this letter in advance of Tuesday's follow-up appeal hearing on 873 Front Avenue.

Although I did not participate in the hearing on January 13, 2026, I did observe and heard the testimony of Mr. Jennrich and Mr. Wallis. A point-for-point recitation of the mischaracterizations, inaccuracies, and outright falsehoods from their statements would not be useful here, but it would be voluminous. I do want to particularly address four key issues:

- There is not an active restraining order between the neighbors, although my clients have considered seeking one in response to the escalating rancorous behavior of Mr. Jennrich, his family, and the many visitors to the property.
- My clients have never impeded Mr. Jennrich, his family, or visitors to the property from leaving via the alley. However, my clients have had construction and personal vehicles in the concrete pad in front of their garage, which is directly across the alley from the 873 Front Avenue alley access. My clients understand that, in the past, vehicles leaving 873 Front Avenue may have used that concrete pad when exiting. However, it was recently replaced and my clients do not want it used by anyone other than themselves and their guests.

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- A sprinkler system was installed jointly on my clients' property with frontage on Front Street and their property with frontage on Milton Street, with a connection running under the alley. The City and my clients have subsequently addressed that issue and the piping under the alley will be removed in the spring. The system was professionally installed and complied with all permitting requirements. There is no evidence that it has in any way caused water intrusion into 873 Front Avenue, and any assertion that any mold found when inspecting the residence would be the fault of my clients is expressly denied.
- The assertion that there is no longer an illegal auto repair business being operated at 873 Front Avenue is belied by the many cars that are constantly parked, for long periods of time, on both on the street in front of the house and in and around the parking area and garage off of the alley. Indeed, the garage on the property does not appear to be used for parking at all, but only for auto repair.

As for other assertions of damage, trespass, etc., those claims are in fact reflections of Mr. Jennrich's own behavior, that of his family, and of the many visitors to the property. Those issues—which are part of and parcel of years of bad behavior on the part of the residents of 873 Front Avenue directed at current and former residents of the neighborhood—will be addressed in litigation between the neighbors that my clients have directed me to initiate.

Ultimately, none of the parade of horrors offered by Mr. Jennrich and Mr. Wallis at the January 13 hearing go to the subject of the DSI correction notices from October 27, 2025, December 1, 2025, or January 5, 2026: the fact that 873 Front Avenue is not an owner-occupied residence and therefore requires a Fire Certificate of Occupancy. This requirement is ultimately about safety. Safety for the residents and safety for the surrounding neighbors. The property has not been dealt with for so long that it may run afoul of Minnesota's three-year statute of limitations for the probating of an estate, Minn. Stat. § 524.3-108, meaning that the process of determining who is the proper owner of the property would require obtaining a decree of descent, Minn. Stat. § 525.31, which will likely be a more time-consuming and expensive process.

My clients appreciate that the City is finally taking seriously complaints about 873 Front Avenue, many of which apparently go back years—indeed, before my clients owned property in the neighborhood. They also understand that whatever the conflicts that may exist between neighbors, the particular issue under review by the LHO is independent of those issues. The only question that matters is one that Mr. Jennrich and Mr. Wallis were

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loathe to address in their testimony: the fact that 873 Front Avenue is not currently an owner-occupied property, that it has not been one for years, and that it is unlikely to be one anytime soon.

Regards,

/s/ Devin T. Driscoll

Devin T. Driscoll

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