

From: [Steen, Jacob W.](#)
To: [Zimny, Joanna \(CI-StPaul\)](#)
Subject: RE: 1600 Seventh St.R-R Steen Ltr.12-19-22
Date: Wednesday, January 4, 2023 10:55:29 AM
Attachments: [image001.png](#)

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Joanna,

Thanks for forwarding this notice. We are getting quotes for debranding and will keep Ms. Moermond apprised.

I have confirmed that Burger King's local vendor has experienced delays in obtaining a black vinyl-coated fence as requested by the City. The temporary above-ground fence has been installed in the interim to ensure control of the site and has been successful in eliminating illegal dumping. Burger King understands the importance of getting it done and they are considering all options, including painting the fence if necessary. We will provide an update on timing as soon as it is available.

I can be available remotely if necessary. Please let me know if anything changes.

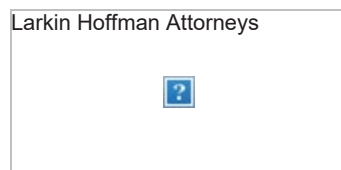
Thank you,

Jake

Jacob Steen
Shareholder

direct | 952-896-3239
fax | 952-842-1738

8300 Norman Center Drive
Suite 1000
Minneapolis, MN 55437-1060
www.larkinhoffman.com



From: Zimny, Joanna (CI-StPaul) <joanna.zimny@ci.stpaul.mn.us>
Sent: Tuesday, January 3, 2023 3:25 PM
To: Steen, Jacob W. <jsteen@larkinhoffman.com>
Subject: RE: 1600 Seventh St.R-R Steen Ltr.12-19-22

This Message Is External to Larkin Hoffman.

I asked Zoning for a copy of the letter, it is attached.

Joanna



Joanna Zimny
Legislative Hearing Executive Assistant
Legislative Hearing Office
Pronouns: she/her/hers
Saint Paul City Hall
Suite 310
15 W. Kellogg Blvd.
Saint Paul, MN 55102
P: 651-266-8515
joanna.zimny@ci.stpaul.mn.us
www.StPaul.gov

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From: Steen, Jacob W. <jsteen@larkinhoffman.com>
Sent: Tuesday, January 3, 2023 2:46 PM
To: Zimny, Joanna (CI-StPaul) <joanna.zimny@ci.stpaul.mn.us>
Subject: RE: 1600 Seventh St.R-R Steen Ltr.12-19-22

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Thanks, Joanna. I'm working on an update from our vendor. We do have the temporary fencing in place while they confirm their ability to replace with vinyl coated.

Thanks,
Jake

Jacob Steen
Shareholder

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Suite 1000
Minneapolis, MN 55437-1060
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Larkin Hoffman Attorneys



From: Zimny, Joanna (CI-StPaul) <joanna.zimny@ci.stpaul.mn.us>
Sent: Tuesday, January 3, 2023 2:24 PM
To: Steen, Jacob W. <jsteen@larkinhoffman.com>
Subject: RE: 1600 Seventh St.R-R Steen Ltr.12-19-22

This Message Is External to Larkin Hoffman.

Good afternoon Mr. Steen,

No, I don't anticipate this being pulled. Below is the resolution going before the Council tomorrow

(apparently amended in the future). I think at most Ms. Moermond would like an update on the status of the coated-vinyl fence before the hearing? That is what was discussed at the December hearing. I just checked the records, and I don't see any code violations so don't foresee any issues there.

I did want to note too, there was a letter sent on : DSI Misc: Enforcement letter - sign violation Burger King - Sent:12/27/2022 11:36:05 AM

Unfortunately I'm unable to open that PDF in the system, so I can't see what it entails or who it was sent too. It does list staff as Kaozouapang Yang who can be reached at +1-651-266-9057 if that's something you aren't aware of and wanted to follow up with. All it says that I can see is says "sign in still up". Let me know if you need a supervisor contact. That's a zoning issue.

Ordering the removal of the structures at 1600 SEVENTH STREET WEST within fifteen (15) days after the August 24, 2022, City Council Public Hearing. (To refer to March 14, 2023 Legislative Hearing)

- **AMENDED 1/4/23**

WHEREAS, the Department of Safety and Inspections has determined that 1600 SEVENTH STREET WEST is a nuisance building pursuant to Saint Paul Legislative Code §45.02 as 1) it is a vacant building as defined in §43.02; and 2) it has multiple housing code or building code violations or it has conditions constituting material endangerment as defined in §34.23, or it has a documented and confirmed history as a blighting influence in the community; and

- WHEREAS, this property is legally described as follows, to wit: PARK ADDITION SUBJ TO ST LOTS 7 THRU LOT 10 BLK 1; and

- WHEREAS, based upon the records in the Ramsey County Recorder's Office and information on file or obtained by the Department of Safety and Inspections, the following are the owners, interested or responsible parties for the subject property as of May 12, 2022: Burger King Corp 2920, PO 020783, Miami FL 33102-0783; Element Financial Corp, 655 Business Center Dr, Horsham PA 19044; CT Lien Solutions, PO Box 29071, Glendale CA 91209-9071; and West 7th/Fort Road Federation; and

- WHEREAS, each of these parties was served a written order dated May 12, 2022 advising them of the basis for the determination that the subject property was a nuisance, and that the nuisance building was to be repaired or razed and removed by June 11, 2022; and

- WHEREAS, this order informed the interested or responsible parties that they must repair or raze and remove the structures(s) located on the Subject Property by June 11, 2022; and

- WHEREAS, a placard indicating the City's order that this nuisance building be abated was posted on the building on May 13, 2022 in accordance with Saint Paul Legislative Code §45.11(2)c; and

- WHEREAS, the nuisance condition was not corrected by June 11, 2022, and therefore an abatement hearing was scheduled before the City Council on August 24, 2022 and the

owner or his duly authorized representative and any interested parties or their duly authorized representatives were properly notified of the time, date and place of the hearing; and

- WHEREAS, the Legislative Hearing Officer provided the owner and other interested parties an opportunity to discuss the matter at a legislative hearings on July 26, 2022, September 13, October 11 and December 13, 2022; and

- WHEREAS, a public hearings were was held on August 24, 2022 and October 26, 2022, and the City Council reviewed the record, which included the exhibits from the Department of Safety and Inspections, the minutes and recommendation of the Legislative Hearing Officer and any testimony at the hearing. Now, Therefore Be It

- RESOLVED, that the Saint Paul City Council hereby finds:

- 1. That the structure(s) at 1600 SEVENTH STREET WEST is a nuisance building pursuant to Saint Paul Legislative Code §45.02, as 1) it is a vacant building as defined in §43.02; and 2) it has multiple housing code or building code violations or it has conditions constituting material endangerment as defined in §34.23, or it has a documented and confirmed history as a blighting influence in the community; and 3) these nuisance conditions have not been corrected after notice of the same to the owner.

- 2. That the Department of Safety and Inspections has complied with all of the procedural requirements of the Saint Paul Legislative Code Chapter 45.

- 3. That the owners, interested parties or responsible parties have not presented a plan acceptable to the Legislative Hearing Officer and Department of Safety and Inspections staff to repair the structure(s) and correct all of the deficiencies listed in the Order to Abate Nuisance Building and the Code Compliance report and to make the structure(s) safe and code compliant within 15 days. And, Be It Further

- RESOLVED, that the City Council orders that the owners, interested parties or responsible parties shall raze and remove the structure(s) within 15 days after the City Council Public Hearing. And, Be it Further

- RESOLVED, that if the necessary corrective action has not been taken within the time allotted, the Department of Safety and Inspections is authorized to take those steps necessary to raze and remove this structure and to charge the costs incurred in accordance with Saint Paul Legislative Code §45.12(4). Any personal property or fixtures of any kind shall be removed by the owners, interested parties or responsible parties prior to the resolution compliance date or it will be considered to be abandoned and the City of Saint Paul shall remove and dispose of such property as it deems appropriate. And, Be It

- FINALLY RESOLVED, that this resolution shall be served on any of the parties required to be notified in Saint Paul Legislative Code §45.12(4).

-

- Hope that helps!

Joanna



Joanna Zimny

Legislative Hearing Executive Assistant
Legislative Hearing Office
Pronouns: she/her/hers
Saint Paul City Hall
Suite 310
15 W. Kellogg Blvd.
Saint Paul, MN 55102
P: 651-266-8515

joanna.zimny@ci.stpaul.mn.us

www.StPaul.gov

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From: Steen, Jacob W. <jsteen@larkinhoffman.com>
Sent: Tuesday, January 3, 2023 2:00 PM
To: Zimny, Joanna (CI-StPaul) <joanna.zimny@ci.stpaul.mn.us>
Subject: RE: 1600 Seventh St.R-R Steen Ltr.12-19-22

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Hi Joanna,

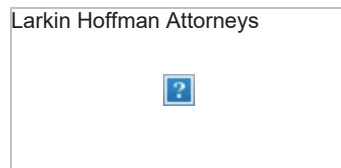
Happy New Year. Do you anticipate the Burger King matter will be removed from the consent agenda tomorrow? I want to be sure to plan accordingly and attend if necessary.

Thanks,
Jake

Jacob Steen
Shareholder

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Minneapolis, MN 55437-1060
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From: Zimny, Joanna (CI-StPaul) <joanna.zimny@ci.stpaul.mn.us>
Sent: Monday, December 19, 2022 10:42 AM
To: Steen, Jacob W. <jsteen@larkinhoffman.com>; kate@primus-companies.com;
frank.richie@transwestern.com
Cc: jgrill@rbi.com; adain@rbi.com; rsteonowicz@larkinhoffman.com; Humphrey, Robert (CI-StPaul) <robert.humphrey@ci.stpaul.mn.us>; Magner, Steve (CI-StPaul) <steve.magner@ci.stpaul.mn.us>; Sheffer, Vicki (CI-StPaul) <vicki.sheffer@ci.stpaul.mn.us>; Yannarely, Joe (CI-StPaul) <joe.yannarely@ci.stpaul.mn.us>

Subject: 1600 Seventh St.R-R Steen Ltr.12-19-22

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Attached please find a letter regarding the above matter.

Thank you,
Joanna



Joanna Zimny

Legislative Hearing Executive Assistant

Legislative Hearing Office

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