

From: [Kelly Hadac](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Objection and Intent to Appeal (RES PH 24-109) (Project #19263)
Date: Wednesday, June 12, 2024 11:11:04 AM
Attachments: [Objection and Intent to Appeal by US Bank Center LLC, 375 Jackson Courtly LLC, First Bank Building LLC and Empire Building LLC.pdf](#)

Dear Council:

Attached please find an Objection and Notice to Appeal being provided on behalf of US Bank Center LLC, 375 Jackson Courtly LLC, First Bank Building LLC and Empire Building LLC. Thank you.

Kelly Hadac, Esq.
Hadac Law Office PLLC
khadac@yahoo.com
(651) 895-6633

US Bank Center LLC

375 Jackson Courtly LLC

First Bank Building LLC

Empire Building LLC

VIA EMAIL TO Contact-Council@ci.stpaul.mn.us

June 12, 2024

15 West Kellogg Blvd
310 City Hall
St. Paul, MN 55102

Re: **Objection and Intent to Appeal**

Public Improvement Construction: Robert Street Assessment; Reconstruction of Streets in 2024 Saint Paul Streets Program, RES PH 24-109 ("**Project**")

Project #: 19263

Property Addresses: 101 5th St E, 135 5th St E, 332 Minnesota Street, and 360 Robert Street North (collectively the "**Property**")

Property IDs: 06-28-22-12-0119, 06-28-22-11-0007; 06-28-22-11-0017, and 06-28-22-11-0015

Dear Mayor, City Clerk, and the St. Paul City Council Members:

I am the managing member of US Bank Center LLC ("USB"), 375 Jackson Courtly LLC ("375 Jackson"), First Bank Building LLC ("FBB"), and Empire Building LLC ("Empire"). USB, 375 Jackson, FBB and Empire shall hereinafter be collectively referred to as the "Owners." The Owners each own one of the parcels identified above which are collectively referred to as the Property.

I understand that the City set a public hearing date of June 12, 2024 in which it intends to consider final approval of the Project and assessments against the Property.

This letter is intended to serve as the Owners' written objection to any assessment against the Property and their intent to appeal the charges if levied against the Owners or the Property.

The Owners object to the assessments as said charges are a tax requiring proof of special benefit. The work does not confer a special benefit on the Property. Any attempt to assess the Property would be bad faith and an unconstitutional taking of private property, among other things. The work done simply does not increase the value of large commercial office buildings.

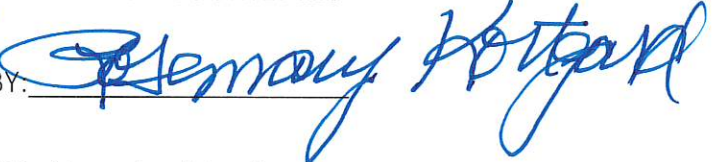
Sincerely,

US BANK CENTER LLC

BY: 

ITS: Managing Member

375 JACKSON COURTLY LLC

BY: 

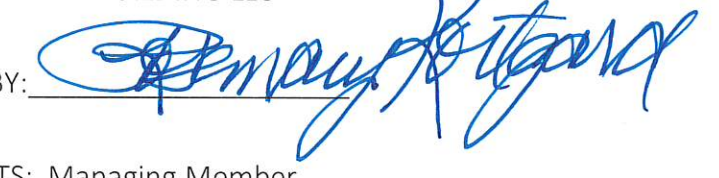
ITS: Managing Member

FIRST BANK BUILDING LLC

BY: 

ITS: Managing Member

EMPIRE BUILDING LLC

BY: 

ITS: Managing Member