

ROBERT HILL LAW, LTD.
ATTORNEYS AT LAW

RECEIVED
JAN 20 2015
CITY CLERKS OFFICE

1339 County Road D East
MAPLEWOOD, MINNESOTA 55109
E-MAIL: bob@roberthilllaw.com

ROBERT A. HILL*
*Also Admitted in Virginia
□Also Admitted in District of Columbia

GENERAL TELEPHONE: 952-426-7373

January 19, 2015

VIA FEDERAL EXPRESS

City Clerk
City of Manitowoc
900 Quay Street
Manitowoc, WI 54220

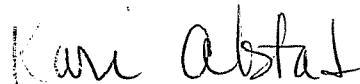
Re: Claim for Excessive Assessment

Dear City Clerk:

Enclosed and personally served upon you please find Claimant CVS Pharmacy's
Claim for Excessive Assessment.

Sincerely,

ROBERT HILL LAW, LTD.



Kari Alstad

/kka

Enclosure

CLAIM FOR EXCESSIVE ASSESSMENT

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JAN 20 2015

CITY CLERKS OFFICE

TO: City Clerk
City of Manitowoc
900 Quay Street
Manitowoc, WI 54220

Now comes Claimant, SCP 2006-C23-114 LLC #854 / CVS Pharmacy, tenant on parcel number 520-035-020 (the "Property") in Manitowoc, Wisconsin, by Claimant's agent/attorney Robert Hill Law, Ltd., and files this Claim for Excessive Assessment against the City of Manitowoc (the "City"), pursuant to WIS.STAT. § 74.37.

1. Claimant is the tenant on the property, located at 701 East Reed Ave, Manitowoc, Wisconsin, is responsible for taxes on the Property and is authorized to bring this claim in its own name.

2. For 2014, property in the City was assessed at 105.2529% of its fair market value as of January 1, 2014, and was taxed at \$20.8755736 per \$1,000 of assessed value.

3. The 2014 assessment of the property was set by the City Assessor's office at \$2,650,000.

4. Claimant made a timely appeal to the Board of Review, which refused to establish a date for a hearing on Claimant's appeal or even recognize Claimant's constitutional and/or statutory right(s) to challenge its property tax assessment.

5. Based on this assessment, the City imposed a tax of \$55,320.27 on the Property.

6. The fair market value of the Property as of January 1, 2014 was no higher than \$1,600,000. This value is derived from sales of comparable properties and by ascertaining the fair market rent for the Property and capitalizing that amount, net of a vacancy and collection loss and net of expenses. In addition, the Property was not assessed uniformly in compliance with Article VIII Section 1 of the Wisconsin Constitution.

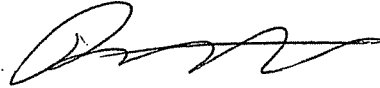
7. Based on the assessment ratio set forth in paragraph 2, the correct assessment of the Property for the 2014 assessment should be no higher than \$1,684,046.40, and the correct tax on the Property for 2014 should be no higher than \$48,425.99.

8. As a result of the excessive assessment of the Property for 2014, an excess tax in at least the amount of \$6,894.28 was imposed on the Property.

9. The amount of this claim is \$6,894.28, plus interest thereon at the statutory applicable rate, or such other amount as may be established by the evidence.

Dated at Maplewood, Minnesota this 16th day of January, 2015.

ROBERT HILL LAW, LTD.

A handwritten signature in black ink, appearing to read 'Robert A. Hill', with a stylized flourish at the end.

Robert A. Hill