

CLAIM FOR EXCESSIVE ASSESSMENT

Maribeth Witzel-Behl
Clerk, City of Madison
210 Martin Luther King Jr. Blvd.
Room 103, City-County Building
Madison, WI 5303



Pursuant to Wis. Stat. § 74.37, Paragon Place at Bear Claw Way II LLC (the “Claimant”), whose address is 660 W Ridgeview Drive, Appleton, Wisconsin 54911, hereby files a 2025 claim for excessive assessment regarding the properties located in the City of Madison (“City”) at 215 and 220 Lakota Way, Parcel Nos. 0708-213-0502-0 (the “-0502 Parcel”) and 0708-213-1301-5 (the “-1301 Parcel”).

1. For the year 2025, the City originally assessed the -0502 Parcel at a total assessed value of \$18,843,800 and the -1301 Parcel at a total assessed value of \$6,662,300 for a collective assessment of \$25,506,100. After filing an objection to the City, the Board of Assessors reduced the 2025 assessment to \$17,113,800 (the -0502 Parcel) and \$6,086,200 (the -1301 Parcel) for a total assessment of \$23,200,000 (collectively the “2025 Assessment”).

2. Claimant timely filed an objection and appeared at a Board of Review hearing. The Board sustained the 2025 Assessment.

3. The 2025 Assessment exceeds the value of the properties as of January 1, 2025.

4. The actual combined fair market value of the -0502 and -1301 Parcels did not exceed \$19,310,000.

5. The Final 2025 assessment resulted in a combined 2025 net property tax amount of \$398,414.43.

6. Claimant has satisfied all conditions precedent to filing this claim, and either has or will timely pay all installments of 2025 property taxes.

7. Claimant hereby requests a refund of 2025 taxes in the minimum amount of at least \$66,624.44, plus statutory interest.

8. The undersigned is authorized to file this Claim on claimant’s behalf based on authorizations previously provided to the City.

Dated this 23rd day of January, 2026.

FOLEY & LARDNER LLP

By 
Eric J. Hatchell

Counsel and Authorized Agent for Claimant