

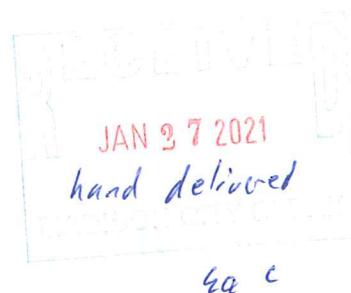
January 25, 2021

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CLAIM FOR UNLAWFUL ASSESSMENT

SERVED BY PROCESS SERVER

Maribeth Witzel-Behl, City Clerk
City of Madison
City County Building
210 Martin Luther King Jr. Boulevard
Madison, WI 53703



Dear Clerk:

Re: Tax Parcel No. 0810-271-0216-0

Now comes Claimant, IA Crossroads, LLC, owner of parcel 0810-271-0216-0 (the "Property") in Madison, Wisconsin, by Claimant's attorneys Reinhart Boerner Van Deuren s.c., and files this Claim for Unlawful Assessment against the City of Madison (the "City"), pursuant to Wis. Stat. § 74.35. You hereby are directed to serve any notice of disallowance on the undersigned agent of the Claimant.

1. This Claim is brought under Wis. Stat. § 74.35, for a refund of unlawful real estate taxes imposed on Claimant by the City for the year 2020, plus statutory interest, with respect to the Property.
2. Claimant is responsible for the payment of property taxes and the prosecution of property tax disputes involving the Property and is authorized to bring this claim in its own name.
3. The City is a body corporate and politic, duly organized as a municipal corporation under Wisconsin law, with its principal office located at 210 Martin Luther King Jr Boulevard, in the City.
4. The Property is located at 2222 Crossroads Drive within the City, and is identified in the City records as Tax Parcel No.0810-271-0216-0.
5. Claimant conveyed the Property, along with 11 other parcels to a related entity in a non-market transaction for no consideration in September of 2019, listing the 2019 assessment of each parcel as the value on the Real Estate Transfer Return.

6. The cumulative assessment of the 12 parcels conveyed and the total amount of the value listed for 12 parcels was \$1,739,000.

7. In setting the 2020 assessment of the 12 parcels conveyed, the City's assessor maintained the 2019 assessed value for 11 of the 12 parcels. However, in setting the 2020 assessment for the Property, the City's assessor incorrectly applied the entire conveyance price to the Property, setting the 2020 assessment of the Property at \$1,739,000.

8. Setting the 2020 assessment of the Property by applying the entire purchase price of 12 parcels to the Property was a palpable error under Wis. Stat. § 74.33(1).

9. The City imposed tax on the Property in the amount of \$41,356.42.

10. Claimant timely paid the property taxes imposed by the City on the Property for 2020, or the required installment thereof.

11. The correct assessment of the Property as of January 1, 2020 was \$442,900.

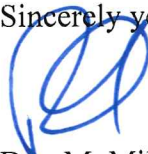
12. Based on the tax rate of \$23.7817 per \$1,000 of assessed value, the correct amount of property tax on the Property for 2020 should be no higher than \$10,532.91.

13. Claimant is entitled to a refund of 2020 tax in the amount of \$30,823.51, or such greater amount as may be determined to be due to Claimant, plus statutory interest.

14. The amount of this claim is \$30,823.51, plus interest thereon

Dated at Madison, Wisconsin, this 25th day of January, 2021.

Sincerely yours,



Don M. Millis
Agent for Claimant