

HUSCH BLACKWELL

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January 30, 2026

VIA PERSONAL SERVICE

City of West Allis
Attn: Tracey Uttke, Clerk
7525 W. Greenfield Avenue
West Allis, WI 53214

Re: Refund Claim – Tax Year 2025
Landmark Harmony Housing LLC
1441 S. 68th Street, Parcel No. 453-0002-001 (“Property 1”)
69 Orchard Street, Parcel No. 453-0001-009 (“Property 2”)

Dear Clerk:

On behalf of Landmark Harmony Housing LLC (“LHH”), and pursuant to Wis. Stat. § 74.35(2), we hereby file this refund claim (“Refund Claim”) against the City of West Allis (“City”). This Refund Claim is to recover the unlawful tax assessed against the above-referenced parcels of real property (“Properties”) because of the City’s assessments as of January 1, 2025 (“2025 Assessments”).

In support of this Refund Claim, LHH asserts that the Properties were exempt by law from taxation, pursuant to Wis. Stat. § 70.11(4a) and (4d), and that their January 1, 2025 assessments as taxable property were non-uniform to other properties in the same classification that were granted exemptions. Further grounds are set forth in the pleadings and papers filed and exchanged in Milwaukee County Case No. 24-CV-6049. All such materials are available with the City Assessor’s office and through consultation with the City’s counsel, Rebecca Monti and Anthony Garcia.

For 2025, the City assessed Property 1 at \$13,442,300, which included \$13,442,300 of exempt property, resulting in taxes of \$297,606.02. Property 2 was assessed at \$150,600, which included \$150,600 of exempt property, resulting in taxes of \$3,335.03. Accordingly, LHH’s Refund Claim is for an amount not less than \$297,606.02 for Property 1 and \$3,335.03 for Property 2, plus any interest as provided by law.

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LHH has complied with all procedures required for objecting to the 2025 Assessments under Wis. Stat. § 74.35(2). LHH has not contested the 2025 Assessments of the Properties under Wis. Stat. §§ 74.33 or 806.04, pursuant to § 74.35(2m).

Despite the unlawful assessments of the Properties, and prior to the filing of this Refund Claim, LHH paid the taxes alleged to be due of \$297,606.02 for Property 1 and \$3,335.03 for Property 2.

By this letter, LHH has stated a valid claim to recover taxes paid with respect to the unlawful assessments on the Properties for the 2025 tax year. LHH respectfully requests that the City act on this Refund Claim within 90 days from the date of service thereof.

Please contact the undersigned with any questions regarding this matter.

Respectfully,

HUSCH BLACKWELL LLP



Robert M. Romashko
Partner

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