

# HUSCH BLACKWELL

1-22-25  
2:30 pm  
Carl N...

Smitha Chintamaneni  
Partner

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January 13, 2025

Received by

JAN 22 2025

City Clerk's Office

## VIA PERSONAL SERVICE

City of Wauwatosa Clerk  
7725 W. North Avenue  
Wauwatosa, WI 53213

### **Re: Refund Claim for 2024 Unlawful Tax**

Milwaukee Regional Medical Center Thermal Service, Inc.  
9250 Watertown Plank Road  
Tax Key No. 373-9999-027

Dear Clerk:

On behalf of Milwaukee Regional Medical Center Thermal Service, Inc. ("MRMC Thermal"), and pursuant to Wis. Stat. § 74.35(2), we file this refund claim ("Claim") for unlawful tax against the City of Wauwatosa (the "City"). This Claim is to recover that amount of the general property tax imposed on the above-referenced real property account ("Property") because the City's January 1, 2024 assessment (the "2024 Assessment") was unlawful.

Further grounds are set forth in the pleadings and papers filed and exchanged in Milwaukee County Case No. 22-CV-4361. All such materials are available with the City Assessor's office and through consultation with the City's counsel: Ms. Amy Seibel, [amy@arslawoffices.com](mailto:amy@arslawoffices.com), 11520 North Port Washington Road, Mequon, WI 53092.

MRMC Thermal's Property qualified for exemption from taxation on January 1, 2024 under Wis. Stat. § 70.11. Notwithstanding the exempt status of MRMC Thermal's Property, assessed the Property at \$4,412,300, resulting in a tax bill of \$99,303.87. MRMC Thermal therefore seeks a refund of the total amount of taxes assessed against the Property of \$99,303.87, plus any interest as provided by law.

MRMC Thermal has complied with the procedures for objecting to the 2024 Assessment under Wis. Stat. § 74.35. MRMC Thermal has not contested the 2024 Assessment of the Property under Wis. Stat. §§ 74.33 or 806.04.

Despite the unlawful assessment of the Property, MRMC Thermal paid in full, on December 13, 2024, prior to the filing of this Claim, the tax of \$99,303.87 alleged to be due. (See Exhibit A, attached.)

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City of Wauwatosa Clerk  
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By this letter, MRMC Thermal has stated a valid claim to recover taxes paid with respect to the unlawful taxes on the Property for the 2024 tax year. MRMC Thermal respectfully requests that the City act on this Claim within 90 days from the date of service thereof.

Please contact the undersigned with any questions regarding this matter.

Very Truly Yours,



Smitha Chintamaneni

Attachment

# 2024 Real Estate Property Tax Receipt

12/13/2024  
03:59:09 PM

**Tax District:** CITY OF WAUWATOSA  
**County:** MILWAUKEE COUNTY  
**Parcel #:** 3739999027  
**Alt. Parcel #:** 373999927

**Property Address:** 9250 WATERTOWN PLANK RC  
**Section/Town/Range:**  
**Volume/Page:**  
**Acres:** 9.060

**Plat:**

**Block/Condo Bldg:**

**Legal Description:**

CERTIFIED SURVEY MAP NO 8723 SE 20, SW 21, NW 28 & NE 29-7-21 LOT 2 2016

**Bill #:** 29111293

Total Land	Total Improve	Total Value	Ratio	Est. Fair Market Value
1,474,100	2,938,200	4,412,300	0.6871	6,421,600

## Payment

**Date Paid:** 12/13/2024  
**Interest/Penalty Date:** 12/13/2024  
**Receipt #:** 225906

<b>Gen. Property Tax:</b>	99,303.87
<b>Special Assessment:</b>	0.00
<b>Special Charges:</b>	0.00
<b>Delinquent Utility Charges:</b>	0.00
<b>Private Forest Crop Taxes:</b>	0.00
<b>Woodland Tax Law Taxes:</b>	0.00
<b>Managed Forest Land Taxes:</b>	0.00
<b>Interest: Dec 2024</b>	0.00
<b>Penalty: Dec 2024</b>	0.00
<b>Other Charges:</b>	0.00
<b>Total Amount Paid:</b>	99,303.87

**CR Batch #:** 54052    **Transaction #:** 199263

<b>Transaction Cash:</b>	0.00
<b>Transaction Check:</b>	99,303.87
<b>Transaction Other:</b>	0.00
<b>Transaction Overpayment:</b>	0.00

## Balance

<b>Prior Tax Balance:</b>	99,303.87
<b>Tax Amount Paid:</b>	99,303.87
<b>New Tax Balance:</b>	0.00
<b>Interest: Dec 2024</b>	0.00
<b>Penalty: Dec 2024</b>	0.00
<b>New Balance Due:</b>	0.00

**Payment Note:**  
BUSINESS CK, CK # 3157

**If Paid By Check, Tax Receipt Is Not Valid Until Check Has Cleared All Banks.**

**RECEIVED BY:**

CITY OF WAUWATOSA  
7725 W NORTH AVE  
WAUWATOSA WI 53213

MILWAUKEE REGIONAL MEDICAL CENTER  
8700 WATERTOWN PLANK RD MB#5  
WAUWATOSA WI 53226

**EXHIBIT A**