



April 12, 2022

Lisa Kristin Farmer, Manager
c/o Uptown Ventures LLC
3684 4th Ave., Unit 1
San Diego, California 92103-4176
Via CMRRR: 7016 2070 0000 7147 1429

Lisa Kristin Farmer, President & Director
Luke Jana, Vice President & Director
Sienna Marie Archibek, Secretary & Director
c/o Hillcrest Towers LLC
3684 4th Ave., Unit 1
San Diego, California 92103-4176
Via CMRRR: 7016 2070 0000 7147 1436

T. Craig Sheils
Sheils Winnubst, PC
1701 N. Collins Blvd., Suite 1100
Via Email to: craig@sheilswinnubst.com

Re: Notice of Abatable Crime and Ordinance Violations at 3606 Greenville Avenue; 5711 Martel Avenue; 5716 Penrose Avenue, Dallas, Texas (the "Properties")

Dear Sir/Madam:

This letter serves to notify you of the repeated occurrences of abatable criminal activity at the Property. As detailed below, if you fail to abate the crime existing on your Properties, the City of Dallas (hereinafter "the City") is prepared to file a lawsuit against you and your Properties.

Notification of Abatable Criminal Activity The following abatable criminal activity has occurred at your Properties:

INCIDENT	REPORT #	DATE
Aggravated Assault	062420-2022	4-10-2022
Criminal Mischief	047254-2022	3-18-2022
Murder	047226-2022	3-18-2022
Aggravated Assault	043838-2022	3-13-2022
Discharged a Firearm	155680-2021	8-29-2021
Criminal Mischief	258659-2018	10-6-2018
Sex Assault	225225-2018	10-6-2018

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Pursuant to Chapter 125 of the Texas Civil Practice and Remedies Code and Chapter 81 of the Texas Alcoholic Beverage Code, a location to which persons habitually go for the purposes of engaging in abatable criminal activity is considered a “common nuisance.” A person who maintains a common nuisance and who knowingly tolerates the activity and furthermore fails to make reasonable attempts to abate the activity may be subject to a suit to abate the common nuisance. A lawsuit may also be filed in rem against the location.

Injunctive Relief Pursuant to the above statutes, the City may obtain injunctive relief including a court order requiring you to implement reasonable measures to prevent the use or maintenance of your Properties as a nuisance and requiring you to post a bond. If you violate the court’s injunction, you could be ordered to pay a fine of not less than \$1,000 or more than \$10,000, be confined in jail for a term of not less than 10 or more than 30 days, or both fined and confined to jail.

TABC Protest Further, please be advised that city representatives intend to protest any application by Bar 3606 for renewal of its TABC permit.

Meeting Request We would like to meet with you on May 4, 2022, at 1:30 pm at our office, 907 S. Carroll Avenue, to discuss how the property owner plans to abate the ongoing criminal activity and related nuisance activity. Please contact me before April 20, 2022, to confirm attendance at the meeting.

Nothing in this letter today should be construed as legal advice to you. Consult your attorney (included in this correspondence).

Sincerely,



Zinzi Bonilla
Assistant City Attorney
Dallas City Attorney’s Office