

James Frank Abbott
Founder and CEO
Community Oversight Partner Services
1006 Grand Boulevard, Apartment 511
Kansas City, MO 64106

247372

ENTERED
Office of Proceedings
April 1, 2019
Part of
Public Record

April 1, 2019

Ms. Cynthia T Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

Re: STB Finance Docket No. 35982, Jackson County Missouri-Acquisition and
Operation Exemption - Union Pacific Railroad

Dear Ms. Brown:

Ed Fishman attempted to justify Jackson County, Missouri's exemption granted by Us
Surface Transportation Brd yesterday
<https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3Ac37ef40f-4c67-417e-a2d4-8495020f6742>. On 11/13/18, Mr. Fishman's colleague, Kevin
Sheys had provided STB with a 110 page filing containing Exhibit A, "ROCK ISLAND
MAINTENANCE AND MANAGEMENT PROGRAM AGREEMENT
(RIMMPA)"<https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3Aa4e177d6-5f62-4f12-9a33-a8b221115fa4> which did not contain the signature of
an official with Kansas City Area Transportation Authority, second party to the alleged
agreement. Furthermore, minutes of Board of Commissioners meetings of KCATA
during the time period of 2/22/17 did not contain reference(s) to the alleged RIMMPA
http://www.kcata.org/about_kcata/entries/board_of_commissioners.

James Frank Abbott, Founder and CEO, Community Oversight Partner Services
(COPS) urges Dennis Hays, Cindy Baker, Jerry Riffel to communicate directly to
STB. There is evidence within Jackson County Legislative records authorizing
RIMMPA; however, there is no evidence to verify KCATA's execution of RIMMPA
<https://jacksonco.legistar.com/LegislationDetail.aspx?ID=2917813&GUID=06B66A92-7C39-40BA-8B24-5A6AE6CF0FFA>.

Respectfully submitted,

Electronically Signed

James Frank Abbott

Certificate of Service

I certify that on March 29, 2019, a true copy of the foregoing letter was served via email upon the following parties of record:

Patrick D Harder
1666 K Street, NW
Suite 500
Washington, DC 20006
pdharder@nossaman.com

Brown, Sandra L.
Thompson Hine LLP
1919 M Street, Suite 700
Washington, DC 20036
Sandra.brown@thompsonhine.com

McCulley, Elizabeth A.
2100 Central
Suite 22p
Kansas City, MO 64108
mcculley@swm.legal

Welsh, Richard
National Association of Reversionary Property Owners
227 Bellevue Way NE PMB 719
Bellevue, WA 98004
Dick156@earthlink.net

Kevin Sheys
Hogan Lovells US LLP
Columbia Square
555 Thirteenth Street NW
Washington DC 20004
kevin.sheys@hoganlovells.com

Ed Fishman
Hogan Lovells US LLP
Columbia Square
555 Thirteenth Street NW
Washington DC 20004
ed.fishman@hoganlovells.com

cc:

Covinsky, Bryan
Interim County Counselor
Jackson County Missouri
415 E 12th Street
Kansas City, MO 64107
bcovinsky@jacksongov.org

