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

ENTERED
Office of Proceedings
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Part of
Public Record

March 26, 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:

Jackson County, Missouri cannot fulfill 1150.31(a) 1 and 4(a) anymore having ripped up track.

49 CFR § 1150.31 - Scope of exemption.

§ 1150.31 Scope of exemption.

(a) Except as indicated below, this exemption applies to all acquisitions and operations under section 10901 (See 1150.1, supra). This exemption also includes:

(1) Acquisition by a noncarrier of rail property that would be operated by a third party;

(2) Operation by a new carrier of rail property acquired by a third party;

(3) A change in operators on the line; and

(4) Acquisition of incidental trackage rights. Incidental trackage rights include the grant of trackage rights by the seller, or the assignment of trackage rights to operate over the line of a third party that occur at the time of the exempt acquisition or operation. This exemption does not apply when a class I railroad abandons a line and another class I railroad then acquires the line in a proposal that would result in a major market extension as defined at § 1180.3(c).

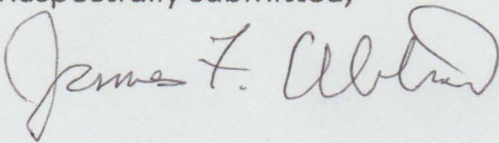
(b) Other exemptions that may be relevant to a proposal under this subpart are the exemption for control at § 1180.2(d)(1) and (2), and the exemption from securities regulation at 49 CFR part 1177.

[51 FR 2504, Jan. 17, 1986, as amended at 81 FR 8855, Feb. 23, 2016]

Civil fraud was committed by Jackson County, Missouri, Union Pacific Railroad and Kansas City Area Transportation Authority in the execution of Line Sale Agreement (12/31/15) and Cooperative Agreement (1/5/16) (Link to Fraud Details)

<https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Asc%3AUS%3A6dab989e-3b6b-418b-b266-a3a818c901b1> Hence, Jackson County and others made representations on 5/2/16 when the 2016 Series Jackson County Missouri Special Obligation Bonds were sold. The fraudulent bond issue was underwritten by Jack Holland, formerly of Ameritas Investment Partners, Kansas City, subsidiary of Ameritas, JoAnn Martin, CEO. Bond Counsel Polsinelli may have had a conflict of interest.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "James F. Abbott". The signature is fluid and cursive, with the first name "James" and last name "Abbott" clearly distinguishable.

James Frank Abbott

Certificate of Service

I certify that on March 25, 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: e

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