

## FORMAL PROTEST PETITION

Pursuant to Section 88-515-09 of the Code of Ordinances of the City of Kansas City, Missouri

Case No. CD-CPC-2025-00054

Rezoning 3809 and 3825 Roanoke Rd. Kansas City, MO

Director Diane Binckley  
City Planning and Development Department  
414 E. 12th Street  
City Hall, 15th Floor  
Kansas City, MO 64106

*Supplemental Copy Electronically Sent to Supervising Planner Genevieve Kohn-Smith*

Formal Protest Petition Against Zoning Map Amendment to Chapter 88, Code of Ordinances of the City of Kansas City, Missouri, commonly known as the Zoning and Development Code, to rezone an area from B3-2 / R-5 to B-3-3, assigned address 3809 and 3825 Roanoke Rd., being the subject of Case Nos. CD-CPC-2025-00054, CD-CPC-2025-00055, CD-CPC-2025-00056, approximately 0.6 acres based on the City Parcel Viewer Map parcel information, and more specifically described (based on the City Parcel Viewer Map) as:

**3825 Roanoke Rd.:** HALMILTON [sic] correctly spelled as HAMILTON HILL--- PT LOTS 1 AND 2 DAF: BEG E ROW ROANOKE RD AND N ROW 39TH ST NOW ESTABLISHED TH N 03 DEG 14 MIN 41 SEC E 200.24' TH S 87 DEG 18 MIN 38 SEC E 129.73' TH S 03 DEG 14 MIN 03 SEC W 200.36' TH; N 87 DEG 15 MIN 13 SEC W 129.76' TO POB (KNOWN AS TRACT 2 ON CERT OF SUR 2022E0069738 B 54 P 64)

More fully described as Tract 2 on the Minor Subdivision Lot Split, filed as a Certificate of Survey, recorded as Instrument No. 2022E0069738, in Book 54, Page 64, on July 25, 2022, with the Recorder of Deeds of Jackson County, Missouri, such Tract 2 is described as:

Tract 2: All that Part of Lot 1 and 2, HAMILTON HILL, a subdivision of land in Kansas City, Jackson County, Missouri, more particularly described as"

Beginning at the intersection of the East right-of-way of Roanoke Road and the North right-of-way line of 39<sup>th</sup> Street as now established, thence N 3 Degrees, 14 Minutes 41 Seconds E along said East right-of-way line a distance of 200.24 feet to a point on the North line of the South 207.75 feet of Lots 1 and 2; thence S 87 Degrees, 18 Minutes, 38 Seconds, E along the North line, a distance of 129.73 feet; thence S Degrees 14 Minutes 3 Seconds W, a distance of 200.36 feet to a point on the North right of way line on Roanoke Road; thence N 87 Degrees 15 Minutes, 13 Seconds, W along said North right-of-way line, a distance of 129.76 feet to the Point of Beginning.

Collectively referred to as "Rezone Property"

As of yet, no Ordinance Number has been assigned that is publicly available.



This Formal Protest Petition is signed on behalf of **Mercier Partners LLC**, a Missouri Limited Liability Company by David Turvey its Member

Brissetty Turvey its member  
Michael Harris its member  
Amanda Butler its member  
Travis Butler its member

who hereby certify that: 1) the Company is the sole owner of **3800 Roanoke Rd, Kansas City, MO**, with a legal description of: N 12 FT LOT 30 BLK 5 & ALL LOT 29 WEST ROANOKE, a subdivision in Kansas City, Jackson County, Missouri, which Company's Property lies within an area determined by lines drawn parallel to and 185 feet distance from the boundaries of the Rezone Property, and 2.) they invoke the provisions of Section 88-515-09 of the Code of General Ordinances of Kansas City, Missouri, and do hereby register protest under those provisions against the proposed rezoning from B-3-2 / R-5 to B-3-3 of the Rezone Property.

David Turvey, Brissetty Turvey, Michael Harris,  
Amanda Butler, and Travis Butler, as the Members  
of **Mercier Partners LLC** being first duly sworn, under oath, depose and state that they have read and examined the foregoing Formal Protest Petition and their signatures are genuine.

David Turvey  
David Turvey

Amanda Butler  
Amanda Butler

Brissetty Turvey  
Brissetty Turvey

Travis Butler  
Travis Butler

Michael Harris  
Michael Harris

STATE of MISSOURI     )  
COUNTY OF JACKSON    )

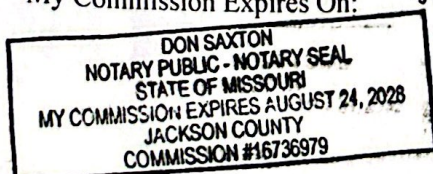
Subscribed and sworn to before me, a notary public, on June 16, 2025, by the above members as the \_\_\_\_\_ of and on behalf of **Mercier Partners LLC**, who are personally known to me to be the same person whose signatures are subscribed to the foregoing Formal Protest Petition and who acknowledge they executed the Formal Protest Petition as their free act and deed on behalf of Mercier Partners, LLC.

Don P. Saxton  
Notary Public

Printed Notary Name: Don P. Saxton

(Seal)

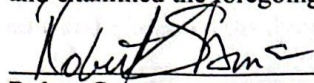
My Commission Expires On: 8-24-2028





This Formal Protest Petition is signed by **Robert Sams** and **Marta Sams**, who hereby certify that: 1) they are the sole owners of **3801 Roanoke Rd, Kansas City, MO**, with a legal description of: **S 137.25 FT OF N 152.25 FT OF W 42 FT LOT 1 HAMILTON HILL**, a subdivision in **Kansas City, Jackson County, Missouri**, which Owners' Property lies within an area determined by lines drawn parallel to and 185 feet distance from the boundaries of the Rezone Property, and 2.) they invoke the provisions of **Section 88-515-09** of the Code of General Ordinances of **Kansas City, Missouri**, and do hereby register protest under those provisions against the proposed rezoning from **B-3-2 / R-5** to **B-3-3** of the Rezone Property.

**Robert Sams** and **Marta Sams** being first duly sworn, under oath, depose and state that they have read and examined the foregoing Formal Protest Petition and their signatures are genuine.

  
Robert Sams

  
Marta Sams

STATE of MISSOURI           )  
COUNTY OF JACKSON       )

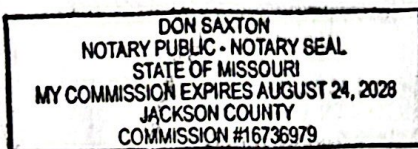
Subscribed and sworn to before me, a notary public, on June 16, 2025, by **Robert Sams** and **Marta Sams**, who are personally known to me to be the same persons whose signatures are subscribed to the foregoing Formal Protest Petition and who acknowledge they executed the Formal Protest Petition as their free act and deed.

  
Notary Public

Printed Notary Name: Don P. Saxton

(Seal)

My Commission Expires On: 8.24.2028



This Formal Protest Petition is signed by **Larry Arnett** and **Dorothy Arnett**, who hereby certify that: 1) they are the sole owners of **1121 W 38th Street, Kansas City, MO**, with a legal description of: **HAMILTON'S HILLS; S 137.25' OF N 152.25' OF E 40' OF W 82' LOT 1**, a subdivision in Kansas City, Jackson County, Missouri, which Owners' Property lies within an area determined by lines drawn parallel to and 185 feet distance from the boundaries of the Rezone Property, and 2.) they invoke the provisions of Section 88-515-09 of the Code of General Ordinances of Kansas City, Missouri, and do hereby register protest under those provisions against the proposed rezoning from B-3-2 / R-5 to B-3-3 of the Rezone Property.

**Larry Arnett** and **Dorothy Arnett** being first duly sworn, under oath, depose and state that they have read and examined the foregoing Formal Protest Petition and their signatures are genuine.

*Larry Arnett*

Larry Arnett

*Dorothy Arnett*

Dorothy Arnett

STATE of MISSOURI            )  
COUNTY OF JACKSON        )

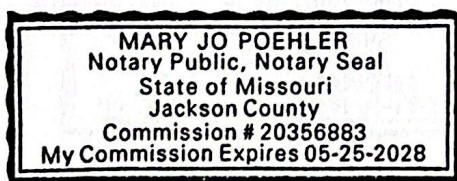
Subscribed and sworn to before me, a notary public, on June 13, 2025, by **Larry Arnett** and **Dorothy Arnett**, who are personally known to me to be the same persons whose signatures are subscribed to the foregoing Formal Protest Petition and who acknowledge they executed the Formal Protest Petition as their free act and deed.

*Mary Jo Poehler*  
Notary Public

Printed Notary Name: Mary Jo Poehler

(Seal)

My Commission Expires On: 05.25.2028





This Formal Protest Petition is signed by **Michael Dickert** and **Hadley Arnett**, who hereby certify that:  
1) they are the sole owners of **1117 W 38th Street, Kansas City, MO**, with a legal description of:  
**HAMILTON HILL; S 137.25' OF N 152.25' OF E 18' OF LOT 1 AND S 137.25' OF; N 152.25' OF W 22'**  
**OF LOT 2**, a subdivision in Kansas City, Jackson County, Missouri, which Owners' Property lies within  
an area determined by lines drawn parallel to and 185 feet distance from the boundaries of the Rezone  
Property, and 2.) they invoke the provisions of Section 88-515-09 of the Code of General Ordinances of  
Kansas City, Missouri, and do hereby register protest under those provisions against the proposed  
rezoning from B-3-2 / R-5 to B-3-3 of the Rezone Property.

**Michael Dickert** and **Hadley Arnett** being first duly sworn, under oath, depose and state that they have  
read and examined the foregoing Formal Protest Petition and their signatures are genuine.

Michael Dickert  
Michael Dickert

Hadley Arnett  
Hadley Arnett

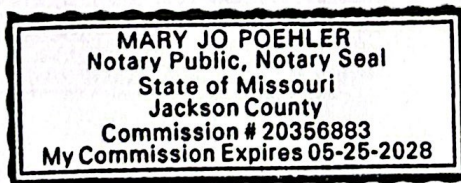
STATE of MISSOURI           )  
COUNTY OF JACKSON       )

Subscribed and sworn to before me, a notary public, on June 13, 2025, by **Michael Dickert** and  
**Hadley Arnett**, who are personally known to me to be the same persons whose signatures are subscribed  
to the foregoing Formal Protest Petition and who acknowledge they executed the Formal Protest Petition  
as their free act and deed.

Mary Jo Poehler  
Notary Public

Printed Notary Name: Mary Jo Poehler

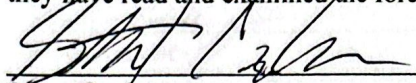
(Seal)  
My Commission Expires On: 05-25-2028

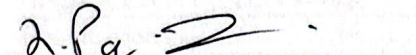




This Formal Protest Petition is signed by **Stuart Carden** and **Neysa Page-Lieberman**, who hereby certify that: 1) they are the sole owners of **1115 W 38th Street, Kansas City, MO**, with a legal description of: **HAMILTON HILL E 8' OF W 30' OF S 137.25' OF N 152.25' LOT 2 AND E 28' OF W 58' OF S 177.25' OF N 192.25' LOT 2**, a subdivision in Kansas City, Jackson County, Missouri, which Owners' Property lies within an area determined by lines drawn parallel to and 185 feet distance from the boundaries of the Rezone Property, and 2.) they invoke the provisions of Section 88-515-09 of the Code of General Ordinances of Kansas City, Missouri, and do hereby register protest under those provisions against the proposed rezoning from B-3-2 / R-5 to B-3-3 of the Rezone Property.

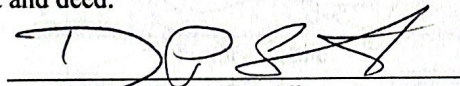
**Stuart Carden** and **Neysa Page-Lieberman** being first duly sworn, under oath, depose and state that they have read and examined the foregoing Formal Protest Petition and their signatures are genuine.

  
Stuart Carden

  
Neysa Page-Lieberman

STATE of MISSOURI           )  
COUNTY OF JACKSON       )

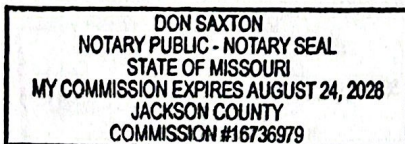
Subscribed and sworn to before me, a notary public, on June 16, 2025, by **Stuart Carden** and **Neysa Page-Lieberman**, who are personally known to me to be the same persons whose signatures are subscribed to the foregoing Formal Protest Petition and who acknowledge they executed the Formal Protest Petition as their free act and deed.

  
Notary Public

Printed Notary Name: Don P. Saxton

(Seal)

My Commission Expires On: 8.24.2028





This Formal Protest Petition is signed by **James Maloney** and **Bonnie Maloney**, who hereby certify that: 1) they are the sole owners of **1111 W 38th Street, Kansas City, MO**, with a legal description of: **HAMILTON'S HILLS; S 177.25' OF N 192.25' OF W 36' OF E 42' OF LOT 2**, a subdivision in Kansas City, Jackson County, Missouri, which Owners' Property lies within an area determined by lines drawn parallel to and 185 feet distance from the boundaries of the Rezone Property, and 2.) they invoke the provisions of Section 88-515-09 of the Code of General Ordinances of Kansas City, Missouri, and do hereby register protest under those provisions against the proposed rezoning from B-3-2 / R-5 to B-3-3 of the Rezone Property.

**James Maloney** and **Bonnie Maloney** being first duly sworn, under oath, depose and state that they have read and examined the foregoing Formal Protest Petition and their signatures are genuine.

*James Maloney* as Trustee for the James E Maloney & Bonnie M Maloney Revocable Trust  
James Maloney  
*Bonnie Maloney* as Trustee for the James E Maloney & Bonnie M Maloney Revocable Trust  
Bonnie Maloney

STATE of MISSOURI     )  
COUNTY OF JACKSON    )

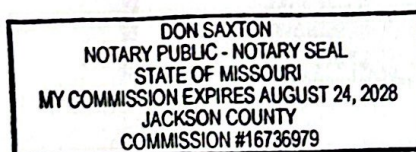
Subscribed and sworn to before me, a notary public, on June 16, 2025, by **James Maloney** and **Bonnie Maloney**, who are personally known to me to be the same persons whose signatures are subscribed to the foregoing Formal Protest Petition and who acknowledge they executed the Formal Protest Petition as their free act and deed.

*[Signature]*  
Notary Public

Printed Notary Name: *Don P. Saxton*

(Seal)

My Commission Expires On: 8.24.2028





This Formal Protest Petition is signed by **Dorothy McKinley**, who hereby certifies that: 1) she is the sole owner of **1107 W 38th Street, Kansas City, MO**, with a legal description of: **HAMILTON'S HILLS; W 30' OF S 177.25' OF N 192.25' OF LOT 3 AND E 6' OF S 177.25'; OF N 192.25' LOT 2**, a subdivision in Kansas City, Jackson County, Missouri, which Owner's Property lies within an area determined by lines drawn parallel to and 185 feet distance from the boundaries of the Rezone Property, and 2.) she invokes the provisions of Section 88-515-09 of the Code of General Ordinances of Kansas City, Missouri, and does hereby register protest under those provisions against the proposed rezoning from B-3-2 / R-5 to B-3-3 of the Rezone Property.

**Dorothy McKinley** being first duly sworn, under oath, deposes and states that she has read and examined the foregoing Formal Protest Petition and her signature is genuine.

*Dorothy McKinley*  
Dorothy McKinley

STATE of MISSOURI           )  
COUNTY OF JACKSON       )

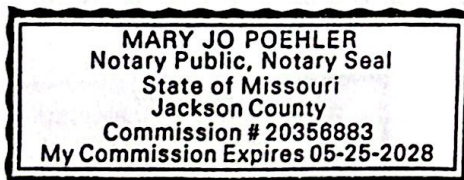
Subscribed and sworn to before me, a notary public, on June 13, 2025, by **Dorothy McKinley**, who is personally known to me to be the same person whose signature is subscribed to the foregoing Formal Protest Petition and who acknowledge they executed the Formal Protest Petition as their free act and deed.

*Mary Jo Poehler*  
Notary Public

Printed Notary Name: Mary Jo Poehler

(Seal)


My Commission Expires On: 05-25-2028





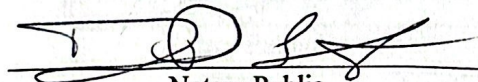
This Formal Protest Petition is signed by James P. Starr, as the sole member and on behalf of JPS Holdings LLC, a Missouri Limited Liability Company, who hereby certifies that: 1) the Company is the sole owner of 1043 W 38th St, Kansas City, MO, with a legal description of: THE SEVILLE UNIT 1043 & 1/24 INTEREST OF COMMON ELEMENTS, a condominium subdivision located in Kansas City, Jackson County, Missouri, which Company's Property lies within an area determined by lines drawn parallel to and 185 feet distance from the boundaries of the Rezone Property, and 2.) they invoke the provisions of Section 88-515-09 of the Code of General Ordinances of Kansas City, Missouri, and do hereby register protest under those provisions against the proposed rezoning from B-3-2 / R-5 to B-3-3 of the Rezone Property.

James P. Starr, as the sole member of JPS Holdings LLC being first duly sworn, under oath, deposes and states that he has read and examined the foregoing Formal Protest Petition and his signature is genuine and on behalf of JPS Holdings, LLC.

  
\_\_\_\_\_

STATE of MISSOURI                    )  
COUNTY OF JACKSON                )

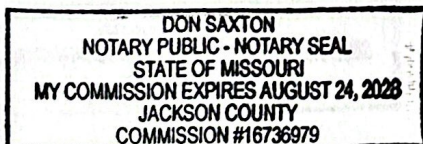
Subscribed and sworn to before me, a notary public, on June 18, 2025, by James P. Starr, who declared himself to be the sole member of JPS Holdings LLC, who is personally known to me to be the same person whose signature is subscribed to the foregoing Formal Protest Petition and who acknowledged he executed the Formal Protest Petition as the free act and deed of JPS Holdings LLC.

  
\_\_\_\_\_  
Notary Public

Printed Notary Name: Don P. Saxton

(Seal)

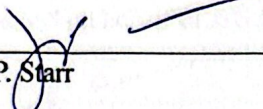
My Commission Expires On: 8.24.2028





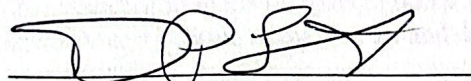
This Formal Protest Petition is signed by **James P. Starr**, who hereby certifies that: 1) he is the sole owner of **1047 W 38th St, Kansas City, MO**, with a legal description of:  
**THE SEVILLE UNIT 1047 1/24 FRACTIONAL INTEREST**, a condominium subdivision located in Kansas City, Jackson County, Missouri, which Company's Property lies within an area determined by lines drawn parallel to and 185 feet distance from the boundaries of the Rezone Property, and 2.) he invokes the provisions of Section 88-515-09 of the Code of General Ordinances of Kansas City, Missouri, and does hereby register protest under those provisions against the proposed rezoning from B-3-2 / R-5 to B-3-3 of the Rezone Property.

**James P. Starr** being first duly sworn, under oath, deposes and states that he has read and examined the foregoing Formal Protest Petition and his signature is genuine.

  
\_\_\_\_\_  
James P. Starr

STATE of MISSOURI            )  
COUNTY OF JACKSON        )

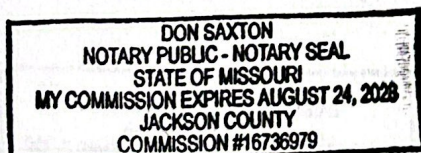
Subscribed and sworn to before me, a notary public, on June 13, 2025, by **James P. Starr**, who is personally known to me to be the same person whose signature is subscribed to the foregoing Formal Protest Petition and who acknowledged he executed the Formal Protest Petition as the free act and deed.

  
\_\_\_\_\_  
Notary Public

Printed Notary Name: Don P. Saxton

(Seal)

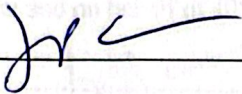
My Commission Expires On: 8.24.2028





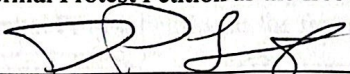
This Formal Protest Petition is signed by James P. Starr, as the Sole member of and on behalf of JPS Holdings LLC, a Missouri Limited Liability Company, who hereby certifies that: 1) the Company is the sole owner of 1075 W 38th St, Kansas City, MO, with a legal description of: THE SEVILLE UNIT 1075 & 1/24 INTEREST OF COMMON ELEMENTS, a condominium subdivision located in Kansas City, Jackson County, Missouri, which Company's Property lies within an area determined by lines drawn parallel to and 185 feet distance from the boundaries of the Rezone Property, and 2.) they invoke the provisions of Section 88-515-09 of the Code of General Ordinances of Kansas City, Missouri, and do hereby register protest under those provisions against the proposed rezoning from B-3-2 / R-5 to B-3-3 of the Rezone Property.

James P. Starr, as the Sole member of JPS Holdings LLC being first duly sworn, under oath, deposes and states that he has read and examined the foregoing Formal Protest Petition and his signature is genuine and on behalf of JPS Holdings, LLC.

  
\_\_\_\_\_

STATE of MISSOURI           )  
COUNTY OF JACKSON       )

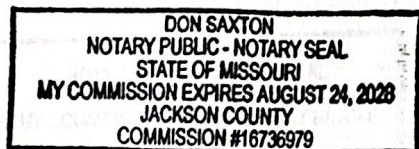
Subscribed and sworn to before me, a notary public, on June 18, 2025, by James P. Starr, who declared himself to be the sole member of JPS Holdings LLC, who is personally known to me to be the same person whose signature is subscribed to the foregoing Formal Protest Petition and who acknowledged he executed the Formal Protest Petition as the free act and deed of JPS Holdings LLC.

  
\_\_\_\_\_  
Notary Public

Printed Notary Name: Don P. Saxton

(Seal)

My Commission Expires On: 8.24.2028



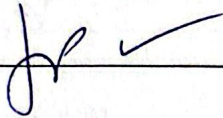


This Formal Protest Petition is signed by James P. Starr, as the Sole member of and on behalf of JPS Holdings LLC, a Missouri Limited Liability Company, who hereby certifies that: 1) the Company is the sole owner of 1077 W 38th St, Kansas City, MO, with a legal description of:

1023-1077 W 38TH ST THE SEVILLE UNITS

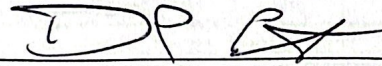
1023,1025,1029,1033,1035,1037,1039,1045,1049,1053,1057,1059,1063,1067,1069,1073,1077, a condominium subdivision located in Kansas City, Jackson County, Missouri, which Company's Property lies within an area determined by lines drawn parallel to and 185 feet distance from the boundaries of the Rezone Property, and 2.) they invoke the provisions of Section 88-515-09 of the Code of General Ordinances of Kansas City, Missouri, and do hereby register protest under those provisions against the proposed rezoning from B-3-2 / R-5 to B-3-3 of the Rezone Property.

James P. Starr, as the Sole member of JPS Holdings LLC being first duly sworn, under oath, deposes and states that he has read and examined the foregoing Formal Protest Petition and his signature is genuine and on behalf of JPS Holdings, LLC.



STATE of MISSOURI           )  
COUNTY OF JACKSON       )

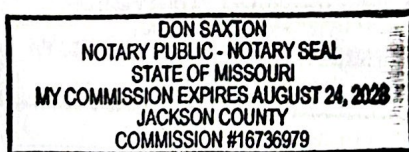
Subscribed and sworn to before me, a notary public, on June 19, 2025, by James P. Starr, who declared himself to be the Sole member of JPS Holdings LLC, who is personally known to me to be the same person whose signature is subscribed to the foregoing Formal Protest Petition and who acknowledged he executed the Formal Protest Petition as the free act and deed of JPS Holdings LLC.

  
Notary Public

Printed Notary Name: Don P. Saxton

(Seal)

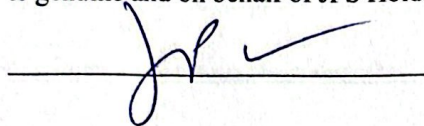
My Commission Expires On: 8.24.2028





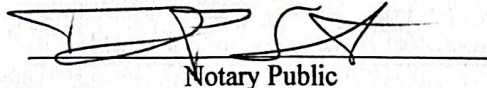
This Formal Protest Petition is signed by James P. Starr, as the Sole member of and on behalf of JPS Holdings LLC, a Missouri Limited Liability Company, who hereby certifies that: 1) the Company is the sole owner of 1079 W 38th St, Kansas City, MO, with a legal description of: THE SEVILLE UNIT 1079 & 1/24 INTEREST OF COMMON ELEMENTS, a condominium subdivision located in Kansas City, Jackson County, Missouri, which Company's Property lies within an area determined by lines drawn parallel to and 185 feet distance from the boundaries of the Rezone Property, and 2.) they invoke the provisions of Section 88-515-09 of the Code of General Ordinances of Kansas City, Missouri, and do hereby register protest under those provisions against the proposed rezoning from B-3-2 / R-5 to B-3-3 of the Rezone Property.

James P. Starr, as the Sole member of JPS Holdings LLC being first duly sworn, under oath, deposes and states that he has read and examined the foregoing Formal Protest Petition and his signature is genuine and on behalf of JPS Holdings, LLC.



STATE of MISSOURI           )  
COUNTY OF JACKSON       )

Subscribed and sworn to before me, a notary public, on June 18, 2025, by James P. Starr, who declared himself to be the Sole member of JPS Holdings LLC, who is personally known to me to be the same person whose signature is subscribed to the foregoing Formal Protest Petition and who acknowledged he executed the Formal Protest Petition as the free act and deed of JPS Holdings LLC.

  
Notary Public

Printed Notary Name: Don P. Saxton

(Seal)

My Commission Expires On: 8.24.2028

