



## NEBRASKA AUDITOR OF PUBLIC ACCOUNTS

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State Auditor

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March 18, 2026

Kristi Wold, Assessor  
Hall County  
200 S Sycamore St., Suite 1  
Grand Island, NE 68801

Dan Nolte, Assessor  
Lancaster County  
555 S 10<sup>th</sup> St., Room 102  
Lincoln, NE 68508

Michael Goodwillie, Assessor  
Douglas County  
1819 Farnam St., Suite 400  
Omaha, NE 68183

Dear Sirs and Madam:

As you may know, the Nebraska Auditor of Public Accounts (APA) has received concerns regarding the tax-exempt status of certain properties leased by the Nebraska Department of Motor Vehicles (Department) in Douglas County, Lancaster County, and Hall County (Counties). As a result, the APA began limited preliminary planning work to determine if a full financial audit or attestation would be warranted. Pursuant thereto, the APA obtained financial records and other relevant documentation from the Counties. Based on the outcome of this preliminary planning work, including an analysis of the information obtained, the APA has determined that a separate financial audit or attestation is unnecessary at this time, as the Counties are audited on an annual basis.

Nevertheless, during the course of the preliminary planning work, the APA noted a certain issue that merits corrective action.

### **Background Information**

The Department is charged with the administration and enforcement of motor vehicle regulations and education of vehicle operators. The Department maintains offices in each of Nebraska's 93 counties. For some of these locations – such as those in Lancaster County, Douglas County, and Hall County (Counties) – the Department leases office space rather than owning it outright. Listed below are the addresses of the Department offices located in the Counties:

- **Hall County Office** – 3529 S Locust St., Grand Island, NE, 68801 (See **Exhibit A** herein)
- **Lancaster County Office** – 4700 Cattle Drive, Lincoln, NE, 68521 (See **Exhibit B** herein)
- **Douglas County Office #1** – 4606 N 56<sup>th</sup> St. Ste 100, Omaha, NE, 68104 (See **Exhibit C** herein)
- **Douglas County Office #2** – 17007 Burt St., Omaha, NE, 68118 (See **Exhibit D** herein)

Services provided at these locations include issuing driver licenses, driver permits, ID cards, commercial driver's licenses, and conducting testing for new licenses.

All four of the above locations being leased by the Department for office space appear to be tied to two different organizations – the H.E.L.P. Foundation of Omaha (Foundation), a charitable non-profit entity, and White Lotus Group, a real estate developer based out of Omaha, Nebraska. Both entities are described in further detail below.

### ***H.E.L.P. Foundation of Omaha***

On its website (<http://www.helpfoundationomaha.org/>), the Foundation describes its mission as follows:

*The H.E.L.P. Foundation of Omaha is a non-profit organization with a noble cause. We believe that we all have an innate social responsibility to help others, especially those who may have fallen on hard times or are under served. We aim to understand those individual's needs through compassion and sensitivity in order to enable them to achieve a better life. Our mission is to be a link in this process by providing health care and healthy living practices, education, affordable housing and, ultimately, love for all people.*

According to the Nebraska Secretary of State's website (<https://sos.nebraska.gov>), the Foundation's President is Sudha Agarwal, and its registered office address is 10404 Essex Court, Suite 101, in Omaha, Nebraska. The following is an image of that address:



### ***White Lotus Group***

The building in which the Foundation's office is located displays, as shown above, signage for White Lotus Group. According to the Nebraska Secretary of State's website, White Lotus Group's registered office shares the same address – 10404 Essex Court, Suite 101, in Omaha, Nebraska – as that of the Foundation. It should be noted also that the CEO for White Lotus Group is Arun Agarwal. In addition to being the son of Sudha Agarwal, the Foundation's President, he served previously on the Board of Directors for that organization.

The White Lotus Group's website (<https://www.whitelotusgroup.com/government>) lists all four of the above Department-leased properties in the company's government portfolio. Despite White Lotus Group's ownership claims, each of these properties is held under different limited liability corporations (LLCs). According to the State's accounting system, all of those LLCs use the same Federal Tax ID number as the Foundation and list the same office address – 10404 Essex Court, Suite 101, in Omaha, Nebraska – occupied by both the Foundation and White Lotus Group. Additionally, both Sudha Agarwal, the Foundation's President, and her son, Arun Agarwal, the CEO for White Lotus Group, are directly associated with the organization and operation of each of the LLCs.

According to the Counties' respective Geographic Information System (GIS) websites, three of the four properties leased by the Department are receiving, at least, a partial tax exemption based on the Foundation's charitable non-profit status. Only the property located at 4606 N 56<sup>th</sup> St. in Omaha, Nebraska, appears to have been assessed its full valuation.

The following comment and recommendation, which has been discussed with the appropriate members of the Counties and their management, is intended to improve internal control or result in other operating efficiencies.

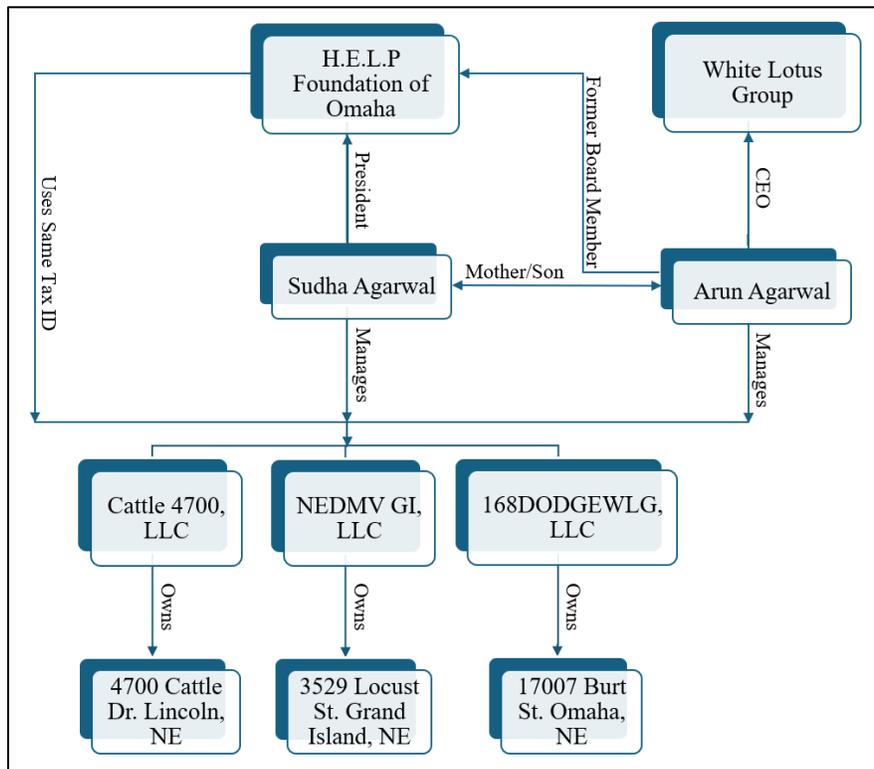
**Comment and Recommendation**

**Potentially Improper Property Tax Exemptions**

After examining the documentation and other information obtained in response to the concerns received, the APA questions whether three of the four properties at issue should have been granted tax exemptions under Neb. Rev. Stat. § 77-202 (Supp. 2025).

Not only do the Department leases contain no provision for any of the properties being beneficially owned by the State through a lease-purchase agreement or other mechanism for transferring the legal title thereto, but also the usage of the properties appears to fall outside of the strict statutory requirements for tax exemption eligibility. The three leased buildings appear to be used entirely by the State as office locations for the Department – not, as required under § 77-202(1)(d)(i), “exclusively for educational, religious, charitable, or cemetery purposes.”

Each of the three tax-exempt properties leased by the Department is owned by a separate LLC. The connections between the Foundation, White Lotus Group, the rental properties, and their respective LLCs are shown in the chart below:



For each of the three properties at issue, the corresponding LLC and the State entered into a separate lease agreement, all of which contain similar language and provisions. Instead of negotiating a lease-purchase clause or other mechanism for transferring the property’s title, however, the State agreed to make monthly rental payments having no such ownership implications.

Shown in the table below are the rents paid by the State for each property, as well the amounts remaining under the agreements as of February 3, 2026:

Payee	Department Location	Lease Term Remaining (Years)	Total Rent Paid	Total Remaining Rent Due
NEDMV GI LLC	Grand Island, Nebraska	19	\$293,557.36	\$10,954,675.04
CATTLE 4700 LLC	Lincoln, Nebraska	18	\$893,550.00	\$10,842,079.68
168DODGE WLG LLC	Omaha, Nebraska	14	\$2,937,267.27	\$8,503,465.63
<b>Totals</b>		<b>51</b>	<b>\$4,124,374.63</b>	<b>\$30,300,220.35</b>

A detailed listing of all the State’s rental payments to the LLCs has been included as **Exhibit E** herein. Additional information regarding each of the three leased properties is provided below.

**Hall County – 3529 S Locust St., Grand Island, Nebraska**

On October 28, 2024, shortly after construction had commenced on the office building housing Hall County’s Driver Licensing Office, the Foundation transferred ownership of that property to NEDMV GI, LLC for \$0, as shown in the image below:

Sales Breakdown			
Sale Date	Sale Price	Name	Book & Page
10/28/2024	\$ 0	NEDMV GI, LLC	<a href="#">2024-5352</a>
3/15/2024	\$ 550,000	H.E.L.P. FOUNDATION OF OMAHA, INC	<a href="#">2024-1147</a>

Following the completion of this new construction, NEDMV GI, LLC entered into a lease agreement with the State beginning July 1, 2025, and continuing until June 30, 2045. The State has made lease payments, totaling \$293,557.36, as of February 3, 2026.

This lease agreement includes the following provision, which describes the return of the property following the 20-year lease term:

**10. Return of Premises.** At the conclusion of this Lease or any extension thereof, Lessee shall return the Demised Premises to Lessor in the same condition as it was received at origination of this Lease, normal wear and tear excepted as provided in Section 9, above. If at the conclusion of this Lease or any extension thereof, Lessor is of the opinion that Tenant Agency is not leaving the Demised Premises in the same condition as it was received, normal wear and tear accepted, then such costs of restoration will be mutually agreed upon between the Parties

Furthermore, this property was to be utilized solely for general office space, as made apparent by the following language:

warrants and represents that it is the owner of the Demised Premises. The Demised Premises are being leased for the sole purpose of general office space.

While the LLC uses the Foundation’s tax-exempt status and Tax ID number, this lease lists Mr. Agarwal and his White Lotus Group email as the contact for the LLC, as shown below:

NEDMV GI, LLC  
 Attn: PROPERTY MANAGEMENT  
 10404 Essex Court, Suite #101  
 Omaha, NE 68131  
 Phone: (402) 346-5550  
 E-mail: [aagarwal@whitelotusgroup.com](mailto:aagarwal@whitelotusgroup.com)

As mentioned previously herein, Mr. Agarwal is associated with each of the LLCs and is the one who signed on behalf of the LLC for this lease agreement, as shown below:

 <hr style="border: 0; border-top: 1px solid black; margin: 2px 0;"/> Arun Agarwal, Authorized Signor NEDMV GI, LLC	03/04/2024 <hr style="border: 0; border-top: 1px solid black; margin: 2px 0;"/> Date
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Despite the rental agreement lacking a lease-purchase provision, and the purpose for leasing the building being solely to provide general office space to the Department, the property received the following tax exemption for 2024:

Tax Information	
Gross Tax Assessed	\$ 4,802.06
Exemption/Credit	\$ 1,033.36
Net Tax	\$ 3,768.70

The APA contacted the Hall County Assessor’s office regarding this property and was informed that the tax exemption was allowed because the Foundation is a tax-exempt entity leasing the building to the State. Since the building was leased to another tax-exempt entity, it was believed to be eligible to receive a tax exemption. Shown below is the property’s exemption application obtained from the Hall County Assessor’s office, which contains the following description regarding intended primary use of the building:

Property described above is used in the following exempt category (please mark the applicable boxes):

Agricultural and Horticultural Society   
 Educational   
 Religious   
 Charitable   
 Cemetery

Give a detailed description of the primary use of the property and all other uses of the property: Please attach ALL documents that would support the property for possible exemption. The burden of proof lies with the organization applying for exemption. Please attach additional pages if needed.

NEDMV GI, LLC, wholly owned by H.E.L.P. Foundation of Omaha, Inc, a charitable 501(c)(3) organization, has developed a department of motor vehicles on behalf of the state of Nebraska. The DMV’s purpose there is education, civic development, teaching for automobile and motorcycle driver’s licenses, and testing. There is a permit for the site.

All organizations, except for an Agricultural and Horticultural Society, must complete the following questions.

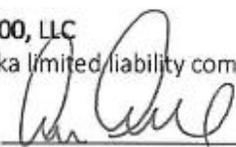
Is all of the property used exclusively as described above? .....  YES     NO  
 Is the property used for financial gain or profit to either the owner, the owner or organization making exclusive use of the property, or private individuals?  YES     NO  
 Is a portion of the property used for the sale of alcoholic beverages? .....  YES     NO  
 If Yes, state the number of hours per week \_\_\_\_\_  
 Is the property owned or used by an organization which discriminates in membership or employment based on race, color, or national origin? ...  YES     NO

**Lancaster County – 4700 Cattle Dr., Lincoln, Nebraska**

The property on which the Lancaster County Driver Licensing Office is located was sold to Cattle 4700 LLC on February 3, 2023, for \$387,996. Following this acquisition, Cattle 4700 LLC constructed an office building and entered into a lease agreement with the State beginning May 1, 2024, and continuing until April 30, 2044. As of February 3, 2026, the State has made lease payments thereon totaling \$893,550.

Similar to the lease for the Department’s office space in Hall County, the lease agreement for this location contains a provision requiring the Department to return the property – in this case, to Cattle 4700 LLC – upon the agreement’s expiration. Additionally, this property was also to be utilized for the sole purpose of “general office space,” and Mr. Agarwal is designated as the contact for the LLC and signed the lease agreement on its behalf, as is shown in the images below:

**To Lessor at:**  
 Cattle 4700, LLC  
 Attn: PROPERTY MANAGEMENT  
 10404 Essex Court, Suite 101  
 OMAHA NE 68131  
 Phone: (402) 346-5550  
 Email: [aagarwal@whitelotusgroup.com](mailto:aagarwal@whitelotusgroup.com)

**Landlord:**  
 Cattle 4700, LLC  
 a Nebraska limited liability company  
 By:   
 Name: Arun Agarwal  
 Title: ~~Manager~~ Authorized Signatory  
 Date: 7/2/2024

Despite the lease agreement not containing a lease-purchase provision and the property being used exclusively as a Department office, it has been granted a 100% charitable tax exemption, as shown in the image below:

2025 OWNER INFORMATION	
Owner Name	CATTLE 4700 LLC
Mailing Address	Attn: H.E.L.P FOUNDATION OF OMAHA INC 10404 ESSEX CT #STE 101 OMAHA, NE 68114
Exemptions	Charitable
Percent Ownership	100%

Since being purchased by Cattle 4700 LLC in 2023, the property has not been assessed any property taxes as a result of this designation.

The APA contacted the Lancaster County Assessor’s office regarding this property and was informed that the reason for the tax exemption is because the Foundation and State are both tax-exempt entities, and the building was used for educational purposes.

This is documented further in the exemption application submitted by Cattle 4700 LLC, as shown below:

Property described above is used in the following exempt category (please mark the applicable boxes):	
<input type="checkbox"/> Agricultural and Horticultural Society	<input type="checkbox"/> Educational
<input type="checkbox"/> Religious	<input checked="" type="checkbox"/> Charitable
<input type="checkbox"/> Cemetery	
<p>LANCASTER COUNTY ASSESSOR'S OFFICE REGISTERED DEEDS</p> <p>Give a detailed description of the primary use of the property and all other uses of the property: Please attach ALL documents that would support the property's possible exemption. The burden of proof lies with the organization applying for exemption. Please attach additional pages if needed.</p> <p>Cattle 4700, LLC, wholly owned by H.E.L.P. Foundation of Omaha, Inc, a charitable 501(c)(3) organization, will preserve the existing property for future redevelopment. We did the exact same project in Omaha as its for education and civic development. Teaching for drivers license for automobile and motorcycles including testing.</p> <p>All organizations, except for an Agricultural and Horticultural Society, must complete the following questions.</p> <p>Is all of the property used exclusively as described above? ..... <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>Is the property used for financial gain or profit to either the owner, the owner or organization making exclusive use of the property, or private individuals? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p> <p>Is a portion of the property used for the sale of alcoholic beverages? ..... <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p> <p>If Yes, state the number of hours per week _____</p> <p>Is the property owned or used by an organization which discriminates in membership or employment based on race, color, or national origin? ... <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>	

**Douglas County – 17007 Burt St., Omaha, Nebraska**

The property leased by the Department for one of the Douglas County Driver Licensing Offices, located at 17007 Burt St. in Omaha, Nebraska, is owned by 168DODGEWLG LLC, which entered into a lease agreement with the State beginning March 21, 2020, and continuing until March 31, 2040. The State has made lease payments, totaling \$2,937,267.27, as of February 3, 2026.

As with the leases for the other two locations, the lease agreement between this LLC and the State contains a provision requiring the return of the property following the end of the lease term, and the lease is for the “sole purpose of general office space.” Nevertheless, the property has not been assessed property taxes since the building’s construction in 2020, as shown in the image below:

Payment History						
Tax Year	Tax Amount	Date Posted	Principal	Interest	Advertising	Total
2024	\$0.00	NONE	\$0.00	\$0.00	\$0.00	\$0.00
2023	\$0.00	NONE	\$0.00	\$0.00	\$0.00	\$0.00
2022	\$0.00	NONE	\$0.00	\$0.00	\$0.00	\$0.00
2021	\$0.00	NONE	\$0.00	\$0.00	\$0.00	\$0.00
2020	\$0.00	NONE	\$0.00	\$0.00	\$0.00	\$0.00

Moreover, despite the LLC using the same tax ID as the Foundation and the Foundation claiming to own the LLC on its application, the lease agreement states that all rent payments are to be made payable to White Lotus Group and lists the contact info for White Lotus Group, as shown in the images below:

To Lessor at:  
 WHITE LOTUS GROUP  
 Attn: PROPERTY MANAGEMENT  
 105 NORTH 31ST AVENUE, SUITE 100  
 OMAHA NE 68131  
 Phone: (402) 346-5550  
 Email: aagarwal@whitelotusgroup.com

Rent shall be made payable to:  
 "White Lotus Group"  
 MEMO: 168<sup>th</sup> & Dodge

It is unclear why the White Lotus Group was listed initially as the payable party since the rent payments were ultimately paid instead to the LLC.

The APA contacted the Douglas County Assessor's office regarding this property and was informed that it was being treated as tax-exempt due to the Foundation's ownership and the State's "educational" use of the property. On the exemption application for this property, the following description is provided regarding the primary use of the property:

Property described above is used in the following exempt category (please mark the applicable boxes):	
<input type="checkbox"/> Agricultural and Horticultural Society	<input type="checkbox"/> Educational
<input type="checkbox"/> Religious	<input checked="" type="checkbox"/> Charitable
<input type="checkbox"/> Cemetery	
Give a detailed description of the primary use of the property and all other uses of the property. Please attach ALL documents that would support the property for possible exemption. The burden of proof lies with the organization applying for exemption. Please attach additional pages if needed.	
168DODGEWLG, LLC, wholly owned by H.E.L.P Foundation of Omaha, Inc, a charitable 501(c)(3) organization, has developed the a department of motor vehicles for the state of Nebraska. The DMV's purpose there is education and civic development. Teaching for drivers license for automobile and motorcycles including testing. The property was exempt this year (2023).	
All organizations, except for an Agricultural and Horticultural Society, must complete the following questions.	
Is all of the property used exclusively as described above?	YES NO
Is the property used for financial gain or profit to either the owner, the owner or organization making exclusive use of the property, or private individuals?	YES NO
Is a portion of the property used for the sale of alcoholic beverages?	YES NO
If Yes, state the number of hours per week _____	
Is the property owned or used by an organization which discriminates in membership or employment based on race, color, or national origin?	YES NO

In order to qualify for a tax exemption, property must meet the criteria established under Neb. Rev. Stat. § 77-202 (Supp. 2025), which provides, as is relevant, the following:

(1) The following property shall be exempt from property taxes:

(a) Property of the state and its governmental subdivisions to the extent used or being developed for use by the state or governmental subdivision for a public purpose. For purposes of this subdivision:

(i) Property of the state and its governmental subdivisions means (A) property held in fee title by the state or a governmental subdivision or (B) property beneficially owned by the state or a governmental subdivision in that it is used for a public purpose and is being acquired under a lease-purchase agreement, financing lease, or other instrument which provides for transfer of legal title to the property to the state or a governmental subdivision upon payment of all amounts due thereunder.

\* \* \* \*

(d)(i) Property owned by educational, religious, charitable, or cemetery organizations, or any organization for the exclusive benefit of any such educational, religious, charitable, or cemetery organization, and used exclusively for educational, religious, charitable, or cemetery purposes, when such property is not (A) owned or used for financial gain or profit to either the owner or user, (B) used for the sale of alcoholic liquors for more than twenty hours per week, or (C) owned or used by an organization which discriminates in membership or employment based on race, color, or national origin.

(Emphasis added.) According to the Nebraska Supreme Court, “[T]ax exemption provisions are strictly construed, and their operation will not be extended by construction. . . . Property which is claimed to be exempt must clearly come within the provision granting exemption from taxation.” *Nebraska State Bar Foundation v. Lancaster County Bd. of Equalization*, 237 Neb. 1, 4, 465 N.W.2d 111, 114 (1991) (quoting *Bethphage Community Services, Inc. v. County Bd. of Phelps County*, 221 Neb. 886, 889, 381 N.W.2d 166, 169 (1986)).

As explained previously, each of the three lease agreements contain a provision requiring the properties to be returned to the LLCs upon conclusion of the lease term – meaning that the leased property could not be granted a tax exemption under (1)(a)(i) of § 77-202. In addition, despite the Foundation’s claims on the exemption application forms that the properties were to be used exclusively for educational purposes, the APA questions whether such contention is reasonable, as the services provided by the Department offices are not exclusively educational. It is important to note also that the exemption category marked on each of the applications shown above was the “Charitable” box rather than the “Educational” box, which gives rise to further questions regarding how the properties’ use as Department offices would be considered, and approved, for a charitable exemption.

After further discussion with the Douglas County Assessor’s office, the APA was directed to the opinion in *Fort Calhoun Baptist Church v. Wash. County Bd. of Equalization*, 277 Neb. 25, 759 N.W.2d 475 (2009) as support for the tax-exempt designations at issue. Upon examination of that opinion, however, the APA noted the following statement regarding tax-exempt property being owned and used by separate entities:

*Although ownership and use of the property may be by different entities, exclusive use of the property for exempt purposes is required. It is the exclusive use of the property that must be determined. The term “exclusively” means that the primary or dominant use of the property, and not an incidental use, is controlling in determining whether the property is exempt from taxation.*

*Id.* at 32, 759 N.W.2d at 481. In light of the above, the APA finds it difficult to concur that any of the Department’s Driver Licensing Offices are used “exclusively” or “primarily” for “educational, religious, charitable, or cemetery purposes” – as, per § 77-202(1)(d)(i), is required to receive a tax exemption for any property “owned by educational, religious, charitable, or cemetery organizations, or any organization for the exclusive benefit of any such educational, religious, charitable, or cemetery organization.” Conversely, because none of the lease agreements contain “a lease-purchase agreement, financing lease, or other instrument which provides for transfer of legal title to the property to the state,” which is required under § 77-202(1)(a)(i) to make the property “beneficially owned by the state,” no tax exemption could be claimed on that account either.

Furthermore, the apparent involvement and overlap between the Foundation and a private real estate group in connection with the above properties raises further questions regarding White Lotus Group’s potential benefit from these tax exemptions.

We recommend the implementation of procedures to ensure that all property tax exemption requests are reviewed thoroughly for compliance with applicable statutory requirements. We further recommend the Counties consider re-evaluating the tax exemptions granted for the three properties at issue. Lastly, due to the nature of the issue addressed herein, we are referring this information to the Property Assessment Division of the Nebraska Department of Revenue for further review.

***Hall County Response:***

*We only approved this exemption after speaking with the State of Nebraska Department of Revenue because we also questioned it. They reviewed the lease and told us to grant it.*

***Lancaster County Response:***

*On behalf of Lancaster County and the Lancaster County Assessor/Register of Deed’s, my office has reviewed the concerns as outlined in your letter sent on February 25, 2026. Your concerns about the Nebraska Department of Motor Vehicles Building located at 4700 Cattle Drive leased through H.E.L.P. and the White Lotus Group are valid, and Lancaster County appreciates the State bringing attention to these concerns.*

*After reviewing Neb.Rev.Stat. §77-202, the criteria necessary to qualify for tax exemption and other tax-exempt parcels located in the County, Lancaster County agrees that this parcel should not be tax exempt. Of primary concern is the failure of the State to enter into a lease to own agreement, rather than a standard lease agreement in which the property reverts back to the current owner. The County will be changing the tax-exempt status for future years and has started the procedure to have tax-exempt status removed for the current year. Steps are being made to have the issue brought forth to the County Board and we will be requesting that the status be changed to fully taxable. Unfortunately, we missed the deadline to send out the letter notifying the tax payer of the changed status but this will get fixed.*

**Douglas County Response:**

See **Attachment 1**.

\* \* \* \* \*

Our audit procedures are designed primarily on a test basis and, therefore, may not bring to light all weaknesses in policies or procedures that may exist. Our objective is, however, to use the knowledge gained during our work to make comments and recommendations that we hope will be useful to the Counties.

Draft copies of this letter were furnished to the Counties to provide their management with an opportunity to review and to respond to the comment and recommendation contained herein. Any formal response received has been incorporated into this letter. Such response has been objectively evaluated and recognized, as appropriate, in the letter. A response that indicates corrective action has been taken was not verified at this time.

This communication is intended solely for the information and use of the Counties and their management. It is not intended to be, and should not be, used by anyone other than these specified parties. However, this communication is a matter of public record, and its distribution is not limited.

If you have any questions regarding the above information, please contact our office.

Audit Staff Working on this Examination:

Craig Kubicek, CPA, CFE – Deputy Auditor  
Mason Culver – Auditor-In-Charge  
Caden Janak – Examiner

Sincerely,



Craig Kubicek, CPA, CFE  
Deputy Auditor  
Auditor of Public Accounts  
Room 2303, State Capitol  
Lincoln, NE 68509  
Phone (402) 471-3686  
[craig.kubicek@nebraska.gov](mailto:craig.kubicek@nebraska.gov)

cc. Nebraska Department of Revenue – Property Assessment Division  
Nebraska Department of Motor Vehicles



DOUGLAS COUNTY  
**ASSESSOR • REGISTER OF DEEDS**

**Michael J. Goodwillie**  
402.444.6703 • Fax: 402.444.3973  
Michael.Goodwillie@douglascounty-ne.gov

March 13, 2026

Craig Kubicek, CPA, CFE  
Deputy Auditor  
Auditor of Public Accounts  
Room 2303, State Capitol  
Lincoln, NE 68509  
craig.kubicek@nebraska.gov

RE: APA–Real Property Exemption for State of Nebraska DMV  
Leasehold Interests in Douglas County

Dear Mr. Kubicek:

Our office is in receipt of your letter dated on or about February 25, 2026, (“the APA letter”) concerning the exempt status of a particular State of Nebraska–DMV leased parcel in Douglas County located at 17007 Burt St., Omaha, NE (“the DMV parcel”). Below, we address your concerns regarding the DMV parcel and provide a brief analysis of the pertinent issues.

**I. Gain or Profit to Owner or User: Threshold Issue**

Regarding the factual background, 168DODGEWLG, LLC (“the LLC”) is the lessor of the DMV parcel. Until our receipt of the APA letter, our office was unaware of the connections among the H.E.L.P. Foundation of Omaha, White Lotus Group, and the LLC.

When evaluating exemption applications, our office looks to the applying organization’s Form 451, including attached ancillary documentation such as articles of incorporation along with public information (e.g., the organization’s website) that is readily and publicly available. Given the number of Form 451 applications we receive, including renewals, our office simply does not have the resources to trace putative exempt organization’s ownership or beneficial ownership ties to for-profit entities or whether any proceeds from the putative non-profit organization flow through to a parent (or brother/sister organization) that are for-profit entities. We sincerely appreciate your highlighting the relationship among the organizations in the APA letter.

As noted in the APA letter, Neb. Rev. Stat. § 77-202(1)(d) dictates whether property is exempt from property taxes under the charitable and educational categories. Without repeating the statutory provisions outlined in the APA letter, Neb. Rev. Stat. § 77-202(1)(d)(i) states that one of the conditions for categorizing property as tax-exempt because of its charitable and/or educational organizational nature and use is that “such property is not (A) owned or use for financial gain or profit to either the owner or user . . .”.

Whether the LLC proceeds from the DMV parcel lease inure to the benefit of White

Lotus Group is outside of our knowledge, and we acknowledge that if such proceeds result in “a financial gain or profit” to White Lotus Group, the DMV parcel is not tax exempt. However, we defer such determination regarding the tracing of funds to the APA, given the APA’s expertise and experience in these matters.

## II. Charitable and/or Educational Use

Reserving the threshold issue of whether the LLC’s funds inure to the benefit of the White Lotus Group in the previous paragraph for the APA’s further review, our office would like to further generally address the charitable/educational use exemption permitted under Neb. Rev. Stat. § 77-202(1)(d) in light of the APA’s letter. Specifically, our office notes the following Nebraska Supreme Court holdings in brief summary as follows:

First, in *Fort Calhoun Baptist Church v. Washington Cnty. Bd. of Equalization*, 277 Neb. 25, 759 N.W.2d 475 (2009), the Nebraska Supreme Court held that the church’s partial lease of its property to the area public school resulted in a 100% “dual-use exemption,” finding as follows:

In this case, the property was being used exclusively for religious or educational purposes. We conclude that the property owned by the Church was used exclusively for religious and/or educational purposes. The School used the fellowship hall, restrooms, and areas for ingress and egress Monday through Friday during school hours, unless the use would interfere with a wedding, funeral, or election. This use was educational and was an exempt use. The remainder of the time, the Church used the property for religious purposes, which was also an exempt use.

This case established that property can be exempt from property taxes even if the property in question is used for different or “dual” exempt purposes.

Moreover, in *Platte River Whooping Crane Maint. Tr., Inc. v. Hall Cnty. Bd. of Equalization*, 298 Neb. 970, 976, 906 N.W.2d 646, 651–52 (2018), the Nebraska Supreme Court held as follows:

TERC found, and the Board argues, that the Legislature did not intend for conservation groups to be considered a “charitable organization” under § 77-202(1)(d). Although we appreciate TERC’s deference to the Legislature, we respectfully disagree. A tax exemption for charitable use is allowed because *those exemptions benefit the public generally and the organization performs services which the state is relieved pro tanto from performing . . .* Because the Legislature views the conservation of endangered species as a policy of the state, and conservation groups like the Crane Trust relieve the state of that burden, we conclude that the Legislature intended for those groups, provided they otherwise meet “charitable organization” criteria, to be considered “charitable organizations” under § 77-202(1)(d). [Emphasis added].

Lastly, in *Lincoln Womans Club v. City of Lincoln*, 178 Neb. 357, 363, 133 N.W.2d 455, 459 (1965), the Nebraska Supreme Court held as follows:

The theory that the rule requiring strict construction of a tax exemption statute demands that the narrowest possible meaning should be given to words descriptive of the objects of it would establish too severe a standard. A liberal and not a harsh or strained construction is to be given to the terms 'educational,' 'religious,' and 'charitable' in order that the true intent of the constitutional and statutory provisions may be realized. The judicial interpretation of such statute should always be reasonable.

Here, notably, with respect to the systematic technical educational instruction, the DMV services include an array of systematic written and driving tests and instruction for a number of licenses, including the following:

- School Learner's Permit (LPE)
- Learner's Permit (LPD)
- School Permit (SCP)
- Provisional Operator's Permit (POP)
- Operator's License (LIC)
- Motorcycle License (Class M)
- Commercial Learner's Permit (CLP)
- Commercial Driver's License (CDL)
- Restricted CDL (RCDL)
- Farm Husbandry Permits (FHP)

Additionally, such DMV technical educational instruction along with its licensing services furthers the State of Nebraska's policy as articulated in Neb. Rev. Stat. § 60-4,132:

The purposes of sections 60-462.01, 60-4,133, and 60-4,137 to 60-4,172 are to implement the requirements mandated by the federal Commercial Motor Vehicle Safety Act of 1986, 49 U.S.C. 31100 et seq., the federal Motor Carrier Safety Improvement Act of 1999, Public Law 106-159, 49 U.S.C. 101 et seq., section 1012 of the federal Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001, USA PATRIOT Act, 49 U.S.C. 5103a, and federal regulations as such acts and regulations existed on January 1, 2025, *and to reduce or prevent commercial motor vehicle accidents, fatalities, and injuries by: (1) Permitting drivers to hold only one operator's license; (2) disqualifying drivers for specified offenses and serious traffic violations; and (3) strengthening licensing and testing standards.* [Emphasis added].

Having established that the DMV, at least in part, provides systematic technical educational services, it is notable that the additional licensure services directly further the State of Nebraska's policy in reducing fatalities and ensuring unqualified drivers refrain from legally endangering the public, among other policies as fully articulated in the statute above. Moreover, organizations such as the LLC allow the State of Nebraska financial and logistical flexibility by assuming the long-term risk of committing capital (i.e., taxpayer funds) to procure fee simple title to real estate and improvements thereon that may not be required at the termination of the lease.

With the proliferation of online instruction in the prior decades and continuing to the present day and undoubtedly beyond, the State of Nebraska's need for multiple DMV locations within Douglas County is uncertain at best. By permitting the State of Nebraska to defer substantial capital expenditures in acquiring fee simple title to the land and potentially obsolete improvements thereon in the coming years, the LLC bears the ultimate long-term risk, not the citizens of the State of Nebraska. This is a concrete, tangible benefit to the State of Nebraska and its taxpaying citizens.

In summary, *Lincoln Woman Club* holds the proposition that the term "charitable" is to be liberally construed as such term is not easily contained within a simple, truncated definition. Moreover, the established systematic technical educational instruction provided by the DMV combined with the charitable aspect of the LLC in providing the State of Nebraska with capital and logistical flexibility as described above results in a "dual use" exemption articulated in *Fort Calhoun Baptist Church*. To bolster this proposition, the DMV's services further the express statutory aims of the State of Nebraska as stated in Neb. Rev. Stat. § 60-4,132, which was a major consideration of the Nebraska Supreme Court in *Platte River Whooping Crane Maint. Tr., Inc.*

### **Conclusion**

As stated in Section I herein, the threshold issue is whether the LLC's proceeds from the DMV parcel lease inures to the benefit of White Lotus Group. To reiterate, if the proceeds are determined by the APA to be a "financial gain or profit" to White Lotus Group, our office agrees that the exemption should be denied.

However, if the LLC's proceeds from the lease proceeds stay within the LLC, our office would respectfully request that the APA reconsider its proposition that the DMV parcel lease is subject to property taxation in light of the above analysis.

Thank you for your attention to this matter and for bringing to light facts that may become relevant in determining the tax exemption status of the DMV parcel. If you have further

questions, please feel free to contact our office at your convenience.

Sincerely,

Michael J. Goodwillie  
Douglas County Assessor/Register of Deeds  
(402) 444-6703  
michael.goodwillie@douglascounty-ne.gov

NEBRASKA DEPARTMENT OF MOTOR VEHICLES  
**Hall County Driver Licensing Office**

**Exhibit A**

***3529 S Locust St. in Grand Island, Nebraska***

The Hall County Driver Licensing Office is located at 3529 S Locust St. in Grand Island, Nebraska, as shown in the image below from one of the Department’s social media accounts:



The Hall County GIS website (<https://gis.grand-island.com/maps/parcel/>) lists NEDMV GI, LLC as the owner of the Driver Licensing Office property, as shown below:



Parcel 400423960	
Owner:	NEDMV GI, LLC
Situs:	3529 S LOCUST ST
Legal:	WAL-MART SOUTH SUB LT 6 BLK 1
Subdivision:	<a href="#">Wal-Mart South Sub</a>
Lots:	<a href="#">Block: 1 Lot: 6</a>
Addresses:	3529 LOCUST ST S
Zoning:	<a href="#">CD Commercial Development Zone</a>
Zoning:	<a href="#">Gateway Corridor Gateway Corridor (overlay)</a>
Zoning:	<a href="#">TA Transitional Agricultural Zone</a>
Matrix:	<a href="#">Zoning Matrix</a>
	<a href="#">Assessor</a>
	<a href="#">Treasurer</a>
Links:	<a href="#">Districts &amp; Elected Officials</a>
	No Streetview available for this area

NEBRASKA DEPARTMENT OF MOTOR VEHICLES  
Lancaster County Driver Licensing Office

Exhibit B

**4700 Cattle Drive in Lincoln, Nebraska**

The property located at 4700 Cattle Dr. in Lincoln, Nebraska, currently serves as Lancaster County's Driver Licensing Office, as shown in the image below:



The Lancaster County Geographic Information System (GIS) website (<https://maps.lincoln.ne.gov/default/index.html?viewer=GISViewer>) lists Cattle 4700LLC as the owner of the Driver Licensing Office parcel, as shown below:



**Parcel ID: 1103358002000**  
Site Address: 4700 CATTLE DR, LINCOLN, NE, 68521  
Legal Description: UNIVERSITY OF NEBRASKA  
TECHNOLOGY PARK 1ST ADDITION, BLOCK 1, Lot 2  
**Owner Information:**  
CATTLE 4700 LLC  
Attn: H.E.L.P FOUNDATION OF OMAHA INC 10404  
ESSEX CT STE 101  
OMAHA, NE 68114  
**2025 Assessed Value: \$3,928,100**

NEBRASKA DEPARTMENT OF MOTOR VEHICLES  
Douglas County Driver Licensing Office #1

Exhibit C

**4606 N 56<sup>th</sup> St. Ste 100 in Omaha, Nebraska**

The property located at 4606 N 56<sup>th</sup> St. Ste 100 in Omaha, Nebraska, currently serves as one of two Driver Licensing Offices in Douglas County, as shown in the image below:



The Douglas County GIS website (<https://dogis.org/Html5viewer/?viewer=dogis>) lists the owner of the parcel as 4606N56 LLC, as shown in the images below:



☆ **Property Address:**  
**Parcel ID (PIN) - 0635480009**  
**Owner - 4606N56 LLC**  
**City -**  
**Zip -**  
**Addition - BENSON HEIGHTS**  
**Lot# - 90**  
**Block# - 0**  
**Sec-Twp-Rng - 06-15-13**  
**Acres - 1.9489**  
[Assessor \(valuations\)](#)  
[Treasurer \(taxes\)](#)  
[Google Street View](#)

NEBRASKA DEPARTMENT OF MOTOR VEHICLES  
Douglas County Driver Licensing Office #2

Exhibit D

***17007 Burt St. in Omaha, Nebraska***

The second Driver Licensing Office in Douglas County is located at 17007 Burt St. in Omaha, Nebraska, as shown in the image below:



The Douglas County GIS website lists 168DODGEWLG LLC as the owner of the Driver Licensing Office building, as shown below:



☆ **Property Address: 17007 BURT ST**  
**Parcel ID (PIN) - 2502390442**  
**Owner - 168DODGEWLG LLC**  
**City - OMAHA**  
**Zip - 68118**  
**Addition - WEST DODGE POINTE REPLAT 3**  
**Lot# - 1**  
**Block# - 0**  
**Sec-Twp-Rng - 16-15-11**  
**Acres - 2.104**  
[Assessor \(valuations\)](#)  
[Treasurer \(taxes\)](#)  
[Google Street View](#)

NEBRASKA DEPARTMENT OF MOTOR VEHICLES  
**Douglas, Lancaster, and Hall County Driver Licensing Office Rent Payments**  
 March 1, 2020, through February 3, 2026

**Exhibit E**

Post Date	Payee	Description	Amount
8/5/2025	NEDMV GI LLC	JULY/AUG RENT	\$73,389.34
8/27/2025	NEDMV GI LLC	SEPTEMBER 2025 RENT	\$36,694.67
9/26/2025	NEDMV GI LLC	OCTOBER 2025 RENT	\$36,694.67
10/29/2025	NEDMV GI LLC	NOVEMBER 2025 RENT	\$36,694.67
11/25/2025	NEDMV GI LLC	DECEMBER 2025 RENT	\$36,694.67
12/29/2025	NEDMV GI LLC	JANUARY 2026 RENT	\$36,694.67
1/28/2026	NEDMV GI LLC	FEBRUARY 2026 RENT	\$36,694.67
<b>NEDMV GI LLC Total</b>			<b>\$293,557.36</b>
4/25/2024	CATTLE 4700 LLC	MAY 2024 RENT	\$40,250.00
5/29/2024	CATTLE 4700 LLC	JUNE 2024 RENT	\$40,250.00
6/24/2024	CATTLE 4700 LLC	JULY 2024 RENT	\$40,250.00
7/29/2024	CATTLE 4700 LLC	AUGUST 2024 RENT	\$40,250.00
8/28/2024	CATTLE 4700 LLC	SEPTMEBER 2024 RENT	\$40,250.00
9/26/2024	CATTLE 4700 LLC	OCTOBER 2024 RENT	\$40,250.00
10/29/2024	CATTLE 4700 LLC	NOVEMBER 2024 RENT	\$40,250.00
11/25/2024	CATTLE 4700 LLC	DECEMBER 2024 RENT	\$40,250.00
12/27/2024	CATTLE 4700 LLC	JANUARY 2025 RENT	\$40,250.00
1/29/2025	CATTLE 4700 LLC	FEBRUARY 2025 RENT	\$40,250.00
2/26/2025	CATTLE 4700 LLC	MARCH 2025 RENT	\$40,250.00
3/26/2025	CATTLE 4700 LLC	APRIL 2025 RENT	\$40,250.00
4/28/2025	CATTLE 4700 LLC	MAY 2025 RENT	\$41,055.00
5/28/2025	CATTLE 4700 LLC	JUNE 2025 RENT	\$41,055.00
6/25/2025	CATTLE 4700 LLC	JULY 2025 RENT	\$41,055.00
7/29/2025	CATTLE 4700 LLC	AUGUST 2025 RENT	\$41,055.00
8/27/2025	CATTLE 4700 LLC	SEPTEMBER 2025 RENT	\$41,055.00
9/26/2025	CATTLE 4700 LLC	OCTOBER 2025 RENT	\$41,055.00
10/29/2025	CATTLE 4700 LLC	NOVEMBER 2025 RENT	\$41,055.00
11/25/2025	CATTLE 4700 LLC	DECEMBER 2025 RENT	\$41,055.00
12/29/2025	CATTLE 4700 LLC	JANUARY 2026 RENT	\$41,055.00
1/28/2026	CATTLE 4700 LLC	FEBRUARY 2026 RENT	\$41,055.00
<b>CATTLE 4700 LLC Total</b>			<b>\$893,550.00</b>
3/30/2020	168DODGE WLG LLC	APRIL 2020 RENT	\$53,097.25
4/27/2020	168DODGE WLG LLC	MAY 2020 RENT	\$39,190.83
5/27/2020	168DODGE WLG LLC	JUNE 2020 RENT	\$39,190.83
6/23/2020	168DODGE WLG LLC	JULY 2020 RENT	\$39,190.83
7/29/2020	168DODGE WLG LLC	AUGUST 2020 RENT	\$39,190.83
8/26/2020	168DODGE WLG LLC	SEPTEMBER 2020 RENT	\$39,190.83
9/28/2020	168DODGE WLG LLC	OCTOBER 2020 RENT	\$39,190.83
10/28/2020	168DODGE WLG LLC	NOVEMBER 2020 RENT	\$39,190.83
11/24/2020	168DODGE WLG LLC	DECEMBER 2020 RENT	\$39,190.83
12/22/2020	168DODGE WLG LLC	JANUARY 2021 RENT	\$39,190.83
1/26/2021	168DODGE WLG LLC	FEBRUARY 2021 RENT	\$39,190.83
2/22/2021	168DODGE WLG LLC	MARCH 2021 RENT	\$39,190.83
3/29/2021	168DODGE WLG LLC	APRIL 2021 RENT	\$39,980.63
4/27/2021	168DODGE WLG LLC	MAY 2021 RENT	\$39,980.63
5/27/2021	168DODGE WLG LLC	JUNE 2021 RENT	\$39,980.63
6/28/2021	168DODGE WLG LLC	JULY 2021 RENT	\$39,980.63
7/28/2021	168DODGE WLG LLC	AUGUST 2021 RENT	\$39,980.63
8/27/2021	168DODGE WLG LLC	SEPTEMBER 2021 RENT	\$39,980.63
9/28/2021	168DODGE WLG LLC	OCTOBER 2021 RENT	\$39,980.63
10/27/2021	168DODGE WLG LLC	NOVEMBER 2021 RENT	\$39,980.63
11/24/2021	168DODGE WLG LLC	DECEMBER 2021 RENT	\$39,980.63
12/28/2021	168DODGE WLG LLC	JANUARY 2022 RENT	\$39,980.63

NEBRASKA DEPARTMENT OF MOTOR VEHICLES  
**Douglas, Lancaster, and Hall County Driver Licensing Office Rent Payments**  
 March 1, 2020, through February 3, 2026

**Exhibit E**

<b>Post Date</b>	<b>Payee</b>	<b>Description</b>	<b>Amount</b>
1/27/2022	168DODGE WLG LLC	FEBRUARY 2022 RENT	\$39,980.63
2/24/2022	168DODGE WLG LLC	MARCH 2022 RENT	\$39,980.63
3/29/2022	168DODGE WLG LLC	APRIL 2022 RENT	\$40,770.43
4/27/2022	168DODGE WLG LLC	MAY 2022 RENT	\$40,770.43
5/26/2022	168DODGE WLG LLC	JUNE 2022 RENT	\$40,770.43
6/27/2022	168DODGE WLG LLC	JULY 2022 RENT	\$40,770.43
7/27/2022	168DODGE WLG LLC	AUGUST 2022 RENT	\$40,770.43
8/29/2022	168DODGE WLG LLC	SEPTEMBER 2022 RENT	\$40,770.43
9/28/2022	168DODGE WLG LLC	OCTOBER 2022 RENT	\$40,770.43
10/27/2022	168DODGE WLG LLC	NOVEMBER 2022 RENT	\$40,770.43
11/28/2022	168DODGE WLG LLC	DECEMBER 2022 RENT	\$40,770.43
12/27/2022	168DODGE WLG LLC	JANUARY 2023 RENT	\$40,770.43
1/27/2023	168DODGE WLG LLC	FEBRUARY 2023 RENT	\$40,770.43
2/24/2023	168DODGE WLG LLC	MARCH 2023 RENT	\$40,770.43
3/29/2023	168DODGE WLG LLC	APRIL 2023 RENT	\$41,584.17
4/25/2023	168DODGE WLG LLC	MAY 2023 RENT	\$41,584.17
5/26/2023	168DODGE WLG LLC	JUNE 2023 RENT	\$41,584.17
6/23/2023	168DODGE WLG LLC	JULY 2023 RENT	\$41,584.17
7/27/2023	168DODGE WLG LLC	AUGUST 2023 RENT	\$41,584.17
8/29/2023	168DODGE WLG LLC	SEPTEMBER 2023 RENT	\$41,584.17
9/26/2023	168DODGE WLG LLC	OCTOBER 2023 RENT	\$41,584.17
10/27/2023	168DODGE WLG LLC	NOVEMBER 2023 RENT	\$41,584.17
11/28/2023	168DODGE WLG LLC	DECEMBER 2023 RENT	\$41,584.17
12/27/2023	168DODGE WLG LLC	JANUARY 2024 RENT	\$41,584.17
1/29/2024	168DODGE WLG LLC	FEBRUARY 2024 RENT	\$41,584.17
2/27/2024	168DODGE WLG LLC	MARCH 2024 RENT	\$41,584.17
3/27/2024	168DODGE WLG LLC	APRIL 2024 RENT	\$42,421.83
4/25/2024	168DODGE WLG LLC	MAY 2024 RENT	\$42,421.83
5/29/2024	168DODGE WLG LLC	JUNE 2024 RENT	\$42,421.83
6/24/2024	168DODGE WLG LLC	JULY 2024 RENT	\$42,421.83
7/29/2024	168DODGE WLG LLC	AUGUST 2024 RENT	\$42,421.83
8/28/2024	168DODGE WLG LLC	SEPTMEBER 2024 RENT	\$42,421.83
9/26/2024	168DODGE WLG LLC	OCTOBER 2024 RENT	\$42,421.83
10/29/2024	168DODGE WLG LLC	NOVEMBER 2024 RENT	\$42,421.83
11/25/2024	168DODGE WLG LLC	DECEMBER 2024 RENT	\$42,421.83
12/27/2024	168DODGE WLG LLC	JANUARY 2025 RENT	\$42,421.83
1/29/2025	168DODGE WLG LLC	FEBRUARY 2025 RENT	\$42,421.83
2/26/2025	168DODGE WLG LLC	MARCH 2025 RENT	\$42,421.83
3/26/2025	168DODGE WLG LLC	APRIL 2025 RENT	\$43,271.47
4/28/2025	168DODGE WLG LLC	MAY 2025 RENT	\$43,271.47
5/28/2025	168DODGE WLG LLC	JUNE 2025 RENT	\$43,271.47
6/25/2025	168DODGE WLG LLC	JULY 2025 RENT	\$43,271.47
7/29/2025	168DODGE WLG LLC	AUGUST 2025 RENT	\$43,271.47
8/27/2025	168DODGE WLG LLC	SEPTEMBER 2025 RENT	\$43,271.47
9/26/2025	168DODGE WLG LLC	OCTOBER 2025 RENT	\$43,271.47
10/29/2025	168DODGE WLG LLC	NOVEMBER 2025 RENT	\$43,271.47
11/25/2025	168DODGE WLG LLC	DECEMBER 2025 RENT	\$43,271.47
12/29/2025	168DODGE WLG LLC	JANUARY 2026 RENT	\$43,271.47
1/28/2026	168DODGE WLG LLC	FEBRUARY 2026 RENT	\$43,271.47
<b>168DODGE WLG LLC Total</b>			<b>\$2,937,267.27</b>
<b>Overall Total</b>			<b>\$4,124,374.63</b>