

OFFICE OF THE CITY ATTORNEY
Sara Grewing, City Attorney



CITY OF SAINT PAUL

Christopher B. Coleman, Mayor

Civil Division

400 City Hall

Telephone: 651 266-8710

15 West Kellogg Blvd.

Facsimile: 651 298-5619

Saint Paul, Minnesota 55102

July 10, 2013

NOTICE OF INTENT TO SUSPEND LICENSES

Mr. Benjamin E. Myers, Esq.
DM Law Group, LLC
207 E. Lake Street, Suite 307
Minneapolis, MN 55408

RE: Taxicab Vehicle licenses for Cab #781, Cab #783, Cab #1386 and Cab #1974 held by Twin Cities Airport Taxi & Limo Svc., Inc. d/b/a Twin Cities Airport Taxi & Limo Service for the City of Saint Paul
License ID #: 20100004068
License ID #: 20100004070
License ID #: 20120000029
License ID #: 20120003754

Dear Mr. Myers:

The Department of Safety and Inspections will recommend suspension of the Taxicab Vehicle licenses for Cab #781, Cab #783, Cab #1386 and Cab #1974 held by Twin Cities Airport Taxi & Limo Svc., Inc. d/b/a Twin Cities Airport Taxi & Limo Service for the City of Saint Paul. The basis for the recommendation is based on the following information:

On May 21, 2013, Twin Cities Airport Taxi & Limo Svc., Inc. d/b/a Twin Cities Airport Taxi & Limo Service was sent an IMPOSITION OF FINE letter from the Department of Safety and Inspections requesting payment of the \$2,000.00 matrix penalty imposed by Saint Paul City Council on May 15, 2013 (RES #13-708). The penalty was imposed for a lapse in Auto Liability Insurance coverage for taxicabs #781, Cab #783, Cab #1386 and Cab #1974.

Twin Cities Airport Taxi & Limo Svc., Inc. d/b/a Twin Cities Airport Taxi & Limo Service was given until June 14, 2013, to pay the \$2,000.00 matrix penalty. On June 11, 2013, the Department received your request to modify the Saint Paul City's Council's fine and stay imposition of the fine. On June 18, 2013, I notified you that the Department did not have authority to modify the Council's action, but could accept a payment plan. Twin Cities Airport Taxi & Limo Svc., Inc. d/b/a Twin Cities Airport Taxi & Limo Service was directed to make the first \$500 payment under a payment plan by June 21, 2013. Twin Cities Airport Taxi & Limo Service, Inc. was notified that failure to make any one of the

payments under

Twin Cities Airport Taxi & Limo Service, Inc.
July 10, 2013
Page 2

scheduled payments could lead to additional adverse action, including suspension of the licenses listed at the beginning of this letter.

As of today's date, no payment has been received.

At this time, you have two options on how to proceed:

1. Twin Cities Airport Taxi & Limo Svc., Inc. d/b/a Twin Cities Airport Taxi & Limo Service can pay the Council imposed \$2,000.00 matrix penalty. If this is your choice, you will need to send your payment to the Department of Safety and Inspections at 375 Jackson Street, Ste. 220, St. Paul, Minnesota 55101-1806 no later than **Wednesday, July 17, 2013**. Payment of the \$2,000.00 matrix penalty will be considered a waiver of the hearing to which you are entitled.
2. If you wish to admit the facts but contest the penalty, you may have a public hearing before the Saint Paul City Council. You will need to send me a letter with a statement admitting to the facts and requesting a public hearing. I will need to receive your letter no later than **Wednesday, July 17, 2013**. The matter will then be scheduled before the City Council for a public hearing to determine whether to suspend your Taxicab Vehicle licenses for Cab #781, Cab #783, Cab #1386 and Cab #1974. You will have an opportunity to appear before the Council and make a statement on behalf of Twin Cities Airport Taxi & Limo Svc., Inc. d/b/a Twin Cities Airport Taxi & Limo Service.

If you have not contacted me by Wednesday, July 17, 2013, I will assume that you are not contesting the suspension of the Taxicab Vehicle licenses for Cab #781, Cab #783, Cab #1386 and Cab #1974. In that case, the matter will be placed on the City Council Consent Agenda for approval of the recommended penalty.

If you have questions about these options, please feel free to contact me at 266-8710.

Sincerely,



Daphne Lundstrom
Assistant City Attorney

cc: Christine Rozek, Deputy Director of DSI
Tom Ferrara, DSI

Enclosures: Imposition of Fine letter
 Signature copy of Council resolution RES #13-708

STATE OF MINNESOTA }
 } ss.
COUNTY OF RAMSEY }

AFFIDAVIT OF SERVICE BY U.S. MAIL

Karen M. Doumany, being first duly sworn, deposes and says that on the 10th day of July, 2013, at the City of Saint Paul, county and state aforementioned, she served the attached **NOTICE OF INTENT TO SUSPEND LICENCES** by depositing in the United States mail at said City of Saint Paul, a true and correct copy thereof, properly enveloped, with first class postage prepaid, and addressed to the following individual:

Mr. Benjamin E. Myers, Esq.
DM Law Group, LLC
207 E. Lake Street, Suite 307
Minneapolis, MN 55408

Karen M. Doumany
Karen M. Doumany

Subscribed and sworn to before me this
10th day of July, 2013.

Rita M. Bossard
Notary Public

