



CITY OF SAINT PAUL
Mayor Melvin Carter

Civil Division
400 City Hall
15 West Kellogg Blvd.
Saint Paul, Minnesota 55102

Telephone: 651 266-8710
Facsimile: 651 298-5619

March 26, 2019

NOTICE OF INTENT TO REVOKE LICENSE

Jamal Omer Adem – Licensee
d/b/a Airport Express Super Taxi
1540 Conway Street
St. Paul, MN 55106-5924

RE: Taxicab Service Company license held by Jamal Omer Adem d/b/a Airport Express Super Taxi for the premises located at 1540 Conway Street in Saint Paul
License ID #: 20170003117

Dear Licensee:

The Department of Safety and Inspections (“Department”) will recommend revocation of the Taxicab Service Company license held by Jamal Omer Adem (“Licensee”) for the premises known as Airport Express Super Taxi located at 1540 Conway Street (“Licensed Premises”).

The Department asserts the following facts along with attachments herein constitute proof of a violation of Saint Paul Legislative Code §§376.17 (a) (2) and (c) (1) by a preponderance of the evidence.

On February 5, 2019 you were sent a letter from the Department of Safety and Inspections (DSI) stating that your Taxicab Service Company license fees were delinquent. You were told to pay the delinquent license and late fees and submit all necessary documents by the end of the business day on February 15, 2019 or adverse action would be taken.

On February 7, 2019 you were sent a second letter from DSI stating that your Taxicab Service Company license fees were still delinquent. In addition, according to department records you currently have four (4) vehicles active with the City of Saint Paul in violation of Saint Paul Legislative Code § 376.16 (a) (2) and (c) (1):

License #20150001415	Sticker #5270
License #20110001023	Sticker #5036
License #20110003799	Sticker #5151
License #20160001514	Sticker #5761

You were told to pay the delinquent Taxicab Service Company license and late fees and register a fifth (5th) vehicle by the end of business on February 20, 2019 or adverse action would be taken. As of today, we have not heard from you.

Saint Paul Legislative Code §376.17 states: “In order to qualify for a taxicab service company license, whether upon initial application or upon application for renewal of a license an applicant must be able to show the following:

...

(2) An applicant shall be affiliated with no less than five (5) taxicabs actively licensed within the City of Saint Paul....”

Saint Paul Legislative Code §376.17 (c) (1) states the basis for adverse action: “.....taxicab service company licenses are subject to adverse action for the following violations: (1) Failure to maintain no less than five (5) licensed, affiliated taxicabs within the City of Saint Paul at all times.”

You have four (4) options to proceed:

1. If you do not contest the imposition of the proposed adverse action, you may do nothing. If I have not heard from you by **Friday, April 5, 2019**, I will presume that you have chosen not to contest the proposed adverse action and the matter will be placed on the **Wednesday, April 17, 2019** City Council Consent Agenda for approval of the proposed remedy.
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 the facts and requesting a public hearing no later than **Friday, April 5, 2019**. The matter will then be scheduled before the City Council to determine whether to revoke your Taxicab Service Company license. You will have an opportunity to appear before the Council and make a statement on your own behalf.
3. If you dispute the facts outlined above, you may request a hearing before an Administrative Law Judge (ALJ). You will need to send me a letter disputing the facts and requesting an administrative hearing no later than **Friday, April 5, 2019**. At that hearing both you and the City will appear and present witnesses, evidence and cross-examine each other's witnesses. After receipt of the ALJ's report (usually within 30 days), a public hearing will need to be scheduled. At that time, the City Council will decide whether to adopt, modify or reject the ALJ's report and recommendation.

Please note: If you choose an administrative hearing, the Department of Safety and Inspections reserves the right to request that City Council impose the costs of the administrative hearing, per Saint Paul Legislative Code § 310.05 (k).

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4. If you no longer wish to do business in the City of Saint Paul, you will need to complete and return the attached REQUEST TO CANCEL LICENSE with the CITY OF SAINT PAUL to the Department of Safety and Inspections, at 375 Jackson Street, Ste. 220, St. Paul, Minnesota 55101-1806 no later than **Friday, April 5, 2019**.

If you have not contacted me by Friday, April 5, 2019, I will assume that you do not contest the revocation of your Taxicab Service Company license. In that case, the matter will be placed on the April 17, 2019 City Council Consent Agenda for approval of the recommended penalty.

If you have questions about these options, please feel free to contact Julie Kraus, my Legal Assistant at (651) 266-8776.

Sincerely,



Therese Skarda
Assistant City Attorney
License No. 0240989

Cc: Jamal Omer Adem, 1375 High Site Drive, Apt. #110, Eagan, MN 55121-2023
Shaquonna Jackson, Community Organizer, District 1 Community Council
Sunray Shopping Center, 2105 ½ Old Hudson Road, St. Paul, MN 55119
Abdurahman Hussein Mamma & Rukia Jimjimo, 1540 Conway Street, St. Paul, MN 55106-5924

Attachments: Letter sent to licensee February 5, 2019 per ECLIPS notes
Letter sent to licensee February 7, 2019 per ECLIPS notes
Renewal Invoice dated March 7, 2019
LIEP Customer Transaction Detail Report dated March 13, 2019
Screenshots from DSI ECLIPS System dated March 11, 2019
STAMP Ownership-Zoning Information
Saint Paul Legislative Code § 376.16
REQUEST TO CANCEL LICENSE with the CITY OF SAINT PAUL

STATE OF MINNESOTA)
) ss.

AFFIDAVIT OF SERVICE BY U.S. MAIL

COUNTY OF RAMSEY)

Julie Kraus, being first duly sworn, deposes and says that on the 26TH day of March, she served the attached **NOTICE OF INTENT TO REVOKE LICENSE** and a correct copy thereof in an envelope addressed as follows:

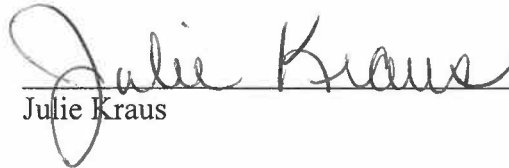
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Abdurahman Hussein Mamma
Rukia Jimjimo
1540 Conway Street
St. Paul, MN 55106-5924

(which is the last known address of said person) depositing the same, with postage prepaid, in the United States mail at St. Paul, Minnesota.


Julie Kraus

Subscribed and sworn to before me
this 26th day of March 2019


Notary Public

