



SCANNED

4501 Allendale Drive  
St. Paul, MN 55127  
craig@midwestbizlaw.com  
(651) 217-8124

RECEIVED

FEB 16 2023

CITY ATTORNEY

February 14, 2023

Via Email and US Mail

Office of the City Attorney  
Attn: Therese Skarda, Esq.  
Civil Division, 15 Kellogg Blvd. West, 400 City Hall  
Saint Paul, MN 55102

RE: MJ Market Inc., Majid Nitaishoon, Cigarette/Tobacco License for the premises  
located at 922 Thomas Avenue, St. Paul, MN. License ID# 20210001131

Dear Ms. Skarda:

This firm represents Mr. Nitaishoon/MJ Market, Inc. I am in receipt of a document sent to MJ Market Inc. dated January 31, 2023, wherein you request a letter disputing the facts alleged in this matter no later than February 14, 2023. Per the NOV, please consider this a formal request for a hearing before an Administrative Law Judge.

It is our client's position that the City of Saint Paul, among other things, is acting in an arbitrary and capricious manner as it relates to the allegations in the Notice of Violation and Request for Revocation of License dated January 31, 2023 and application of the relevant city ordinances.

If you have any questions or concerns, please contact me via email address [craig@midwestbizlaw.com](mailto:craig@midwestbizlaw.com) or by phone at (601) 594-0924. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Craig J. Beuning".

Craig J. Beuning #0316660  
Midwest Business Law, PLLC

Attorneys for MJ Market Inc. d/b/a MJ Market and Majid Nitaishoon

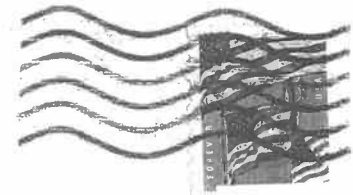




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SAINT PAUL MN 550

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55102-772300

