



CITY OF SAINT PAUL
Christopher B. Coleman, Mayor

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

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

April 10, 2013

NOTICE OF VIOLATION

Abdinoor Dolal
Twin Cities Airport Taxi & Limo Service
9217-17th Avenue South, Ste. 212
Bloomington, MN 55425

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 Abdinoor Dolal:

The Department of Safety and Inspections will recommend adverse action against 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 February 27, 2013, the Department of Safety and Inspections (DSI) received a Certificate of Liability Insurance from National Casualty Co. showing liability insurance coverage for Cab #781, Cab #1386 and Cab #1974 from November 16, 2012 through November 16, 2013. Your previous policy with American Casualty Company showed coverage from November 11, 2011 through November 11, 2012. This shows a lapse in insurance coverage from November 11, 2012 to November 16, 2012.

Also, according to the Certificate of Liability Insurance, Cab #783 was not added to the current policy until January 29, 2013. This shows a lapse in insurance coverage from November 11, 2012 through January 29, 2013.

Due to the fact that these insurance violations involved four (4) of your taxicabs, per Saint Paul Legislative Code § 310.05 (m) (2), the licensing office will recommend a \$500.00 matrix penalty for each lapse in insurance for a total of \$2,000.00.

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


1. You can pay the recommended \$2,000.00 matrix penalty. If this is your choice, you should make payment directly to the Department of Safety and Inspections, at 375 Jackson Street, Ste. 220, St. Paul, Minnesota 55101-1806 no later than **Monday, April 22, 2013**. A self-addressed envelope is enclosed for your convenience. Payment of the \$2,000.00 matrix penalty will be considered to be a waiver of the hearing to which you are entitled.
2. If you wish to admit the facts but you 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 by **Monday, April 22, 2013**. The matter will then be scheduled before the City Council for a public hearing to determine whether to impose the \$2,000.00 matrix penalty. 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 **Monday, April 22, 2013**. 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).

If you have not contacted me or DSI by Monday, April 22, 2013, I will assume that you do not contest the imposition of the \$2,000.00 matrix penalty. 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
Abdinor Dolal, 2740 Stevens Avenue South, Apt. #1, Minneapolis, MN 55408

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 10th day of April she served the attached **NOTICE OF VIOLATION** and a correct copy thereof in an envelope addressed as follows:

Abdinoor Dolal
Twin Cities Airport Taxi & Limo Service
9217-17th Avenue South, Ste. 212
Bloomington, MN 55425

Abdinoor Dolal
2740 Stevens Avenue South, Apt. #1
Minneapolis, MN 55408

(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
Julie Kraus

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

Rita M. Bossard
Notary Public

