

Vang, Mai (CI-StPaul)

From: Patrick Boyle <pboyle@boylelawbiz.com>
Sent: Monday, September 9, 2019 7:16 PM
To: Zimny, Joanna (CI-StPaul); nagrawal01@gmail.com; *CI-StPaul_LegislativeHearings
Cc: Migdal, Sebastian (CI-StPaul); Vang, Mai (CI-StPaul); Ekobena, Richard (CI-StPaul); kingsauto2010@yahoo.com; poslaayeislaan@gmail.com; kingsauto2010@gmail.com; shabeelj@yahoo.com; shoker23@ymail.com; Perucca, James (CI-StPaul); Schmidt, Brian (CI-StPaul); Shaff, Leanna (CI-StPaul); Wiese, Angie (CI-StPaul); Amber Buersken; Craig Nilles; usstmc@gmail.com; azharbotan@gmail.com; agaryar@yahoo.com
Subject: RE: 275 McKnight Road South Letter
Importance: High

Think Before You Click: This email originated outside our organization.

Regrettably, I am not able to attend tomorrow's hearing, as I have a previous court commitment that I cannot move or change. My clients (I now represent the Mosque as well) will be present, however. I will try to call in so that I can participate in that fashion.

I did want to address some concerns brought to my attention in multiple meetings with my clients since last week. First and foremost, Mr. Agrawal continues to do **nothing** to rectify this issue. I sent Mr. Agrawal a letter on Friday (September 6) reiterating **everyone's** demand that he fix the plumbing and other issues at the Property. It seems that all he has done is continued to speak with plumbers on a **very** infrequent basis while scheduling nothing and accomplishing nothing. The business owners at McKnight Road South are, almost exclusively, single location entities. They do not have 5 or 6 stores, shops, or restaurants from which to draw income; they have only their locations at McKnight Road South. Despite knowing about this plumbing problem for some time, Mr. Agrawal allowed the entire complex to fall into total disrepair and become condemned. He has put hard-working citizens out of work and does not seem the least bit concerned about that.

At this point, serious action needs to be taken against Mr. Agrawal. The City needs to send him a message that he cannot ignore; alternatively, the City should work with me and my clients directly to rectify this issue so that they and their employees can return to work.

Finally, my clients inform me that Shamrock Liquors has been reopened. I respectfully request the basis on which this decision was made and any documents provided by the owner of Shamrock Liquors that led to this decision. My clients maintain that (1) re-opening the liquor store continues to represent a health and safety hazard and (2) re-opening **any** store merely encourages Mr. Agrawal to fix **nothing**. If any business at McKnight Road South is allowed to open, Mr. Agrawal has that much less incentive to perform any repairs or address any issues. Please keep this in mind moving forward.

I appreciate your continued time and attention in this matter. Please keep me informed of any developments moving forward, and please work with myself and my clients to rectify this issue.

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From: Patrick Boyle <pboyle@boylelawbiz.com>

Sent: Thursday, September 5, 2019 4:28 PM

To: Zimny, Joanna (CI-StPaul) <joanna.zimny@ci.stpaul.mn.us>; nagrawal01@gmail.com; legislativehearings@ci.stpaul.mn.us

Cc: Migdal, Sebastian (CI-StPaul) <sebastian.migdal@ci.stpaul.mn.us>; Vang, Mai (CI-StPaul) <mai.vang@ci.stpaul.mn.us>; Ekobena, Richard (CI-StPaul) <richard.ekobena@ci.stpaul.mn.us>; azhorbotan@gmail.com; kingsauto2010@yahoo.com; poslaayeislaan@gmail.com; kingsauto2010@gmail.com; shabeelj@yahoo.com; shoker23@ymail.com; Perucca, James (CI-StPaul) <james.perucca@ci.stpaul.mn.us>; Schmidt, Brian (CI-StPaul) <brian.schmidt@ci.stpaul.mn.us>; Shaff, Leanna (CI-StPaul) <leanna.shaff@ci.stpaul.mn.us>; Wiese, Angie (CI-StPaul) <angie.wiese@ci.stpaul.mn.us>; Amber Buersken <abuersken@boylelawbiz.com>; Craig Nilles <cnilles@boylelawbiz.com>; usstmc@gmail.com

Subject: RE: 275 McKnight Road South Letter

Please be advised that **most** of the business owners at 275 McKnight Road South have retained my services to assist them with this matter. Please see the attached; I am still waiting to hear back from the Imam who runs the Mosque and Makhan, the gentleman who owns and operates Shamrock Plaza Liquor. Mr. Syed, the owner and operator of the Coffee Shop, has been added to this email as well; he was unable to attend this week's meeting.

At this time, my clients are respectfully declining to provide a specific proposal as to "how [their] business will operate in a sanitary fashion, including handwashing, bathroom facilities, and necessary cleaning facilities for property maintenance on site." This is true for several reasons. First and foremost, my clients firmly believe that, were they to re-open on any kind of limited or interim basis, their landlord would feel like he never needs to fix this problem because they are open. Second, opening without running water would by definition be a health and safety hazard for most of the relevant business, especially the restaurants. Finally, any proposal would by definition include the installation of portable bathroom facilities; the provision of water from an outside source, bottles or jugs; and creativity when it came to dishwashing and storage. These factors would make any proposal prohibitively expensive at this time.

At this point, my clients' genuine proposal to re-open is to have their plumbing fixed and water restored before September 11, 2019. My clients urge (to the point of demanding) Mr. Agrawal to fix this problem in the timeframe allowed by the City. My clients and I plan to attend the hearing on September 11, and we plan to make any proposals or take the appropriate actions based on what Mr. Agrawal does between now and then.

We appreciate your time and attention to this matter. If you have any further questions, comments or concerns, please do not hesitate to contact me.

Patrick D. Boyle

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From: Zimny, Joanna (CI-StPaul) <joanna.zimny@ci.stpaul.mn.us>

Sent: Wednesday, September 4, 2019 1:29 PM

To: nagrawal01@gmail.com

Cc: Migdal, Sebastian (CI-StPaul) <sebastian.migdal@ci.stpaul.mn.us>; Vang, Mai (CI-StPaul) <mai.vang@ci.stpaul.mn.us>; Ekobena, Richard (CI-StPaul) <richard.ekobena@ci.stpaul.mn.us>; azhorbotan@gmail.com; Patrick Boyle <pboyle@boylelawbiz.com>; kingsauto2010@yahoo.com; poslaayeislaan@gmail.com; kingsauto2010@gmail.com; shabeelj@yahoo.com; shoker23@ymail.com; Perucca, James (CI-StPaul) <james.perucca@ci.stpaul.mn.us>; Schmidt, Brian (CI-StPaul) <brian.schmidt@ci.stpaul.mn.us>; Shaff, Leanna (CI-StPaul) <leanna.shaff@ci.stpaul.mn.us>; Wiese, Angie (CI-StPaul) <angie.wiese@ci.stpaul.mn.us>

Subject: 275 McKnight Road South Letter

Attached please find a letter regarding the above matter.

Thank you,

Joanna



Joanna Zimny

Executive Assistant

City Council Legislative Hearings

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