



SAINT PAUL
CITY ATTORNEY

OFFICE OF THE CITY ATTORNEY
LYNDSEY M. OLSON, CITY ATTORNEY

Civil Division, 15 Kellogg Blvd. West, 400 City Hall
Saint Paul, MN 55102
Tel: 651-266-8571 | Fax: 651-298-5619

February 10, 2025

**NOTICE OF VIOLATION AND REQUEST FOR IMPOSITION OF
\$1,000.00 MATRIX PENALTY**

M F K Enterprise Inc
d/b/a M F K Enterprise
830 Robert Street South
Saint Paul, MN 55107
Attn: Moe Faryaneh Kia

RE: Auto Repair Garage & Second Hand Dealer – Motor Vehicle license held by M F K Enterprise Inc d/b/a M F K Enterprise for the premises located at 830 Robert Street South, in Saint Paul.
License ID #: 57957

Dear Licensee:

The Department of Safety and Inspections ("Department") has recommended adverse action against the Auto Repair Garage & Second Hand Dealer – Motor Vehicle License held by M F K Enterprise Inc ("Licensee"). M F K Enterprise located at 830 Robert Street South (Licensed Premises").

Legal Basis for Action:

Saint Paul Legislative Code §310.01, defines Adverse Action as:

"the revocation or suspension of a license, the imposition of conditions upon a license, the denial of an application for the grant, issuance or renewal of a license, the imposition of a fine, the assessment of the costs of a contested hearing, and any other disciplinary or unfavorable action taken with respect to a license, licensee, or applicant for a license. Adverse action includes any of the foregoing directed at one (1) or more licenses held by a licensee at any location in the city. Adverse action also includes disapproval of licenses issued by the state under statutory provisions which permit the governing body to disapprove the issuance of the license."

Saint Paul Legislative Code §310.04(b)(5) states: "The licensee or applicant has failed to comply with any condition set forth in the license, or set forth in the resolution granting or renewing the license."

Saint Paul Legislative Code §310.04(b)(6)(a) states: "The licensee or applicant (or any person whose conduct may by law be imputed to the licensee or applicant) has violated, or performed any act which is a violation of, any of the provisions of these chapters or of any statute, ordinance or regulation reasonably

CITY OF SAINT PAUL
MELVIN CARTER, MAYOR

STPAUL.GOV

EXHIBIT

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related to the licensed activity, regardless of whether criminal charges have or have not been brought in connection therewith."

Saint Paul Legislative Code §310.04(b)(6)(c) states: "The licensee or applicant (or any person whose conduct may by law be imputed to the licensee or applicant) has engaged in or permitted a pattern or practice of conduct of failure to comply with laws reasonably related to the licensed activity or from which an inference of lack of fitness or good character may be drawn."

Saint Paul Legislative Code §310.04(b)(7) states: "The activities of the licensee in the licensed activity created or have created a serious danger to the public health, safety or welfare, or the licensee performs or has performed his or her work or activity in an unsafe manner."

Saint Paul Legislative Code §310.04(b)(8) states: "The licensed business, or the way in which such business is operated, maintains or permits conditions that unreasonably annoy, injure or endanger the safety, health, morals, comfort or repose of any considerable number of members of the public."

Saint Paul Legislative Code §310.04(c)(1) states: "When a reasonable basis is found to impose reasonable conditions and/or restrictions upon a license issued or held under these chapters, any one (1) or more such reasonable conditions and/or restrictions may be imposed upon such license for the purpose of promoting public health, safety and welfare, of advancing the public peace and the elimination of conditions or actions that constitute a nuisance or a detriment to the peaceful enjoyment of urban life, or promoting security and safety in nearby neighborhoods."

Saint Paul Legislative Code §310.04(c)(2) states: "A limitation or restriction as to the location within the licensed business or establishment where particular type of activities may be conducted."

Saint Paul Legislative Code §310.04(c)(3) states: "A limitation as to the means of ingress or egress from the licensed establishment or its parking lot or immediately adjacent area."

Saint Paul Legislative Code §310.04(c)(4) states: "A requirement to provide off-street parking in excess of other requirements of law."

Saint Paul Legislative Code §310.04(c)(6) states: "Any other reasonable condition or restriction limiting the operation of the licensed business or establishment to ensure that the business or establishment will harmonize with the character of the area in which it is located, or to prevent the development or continuation of a nuisance."

Saint Paul Legislative Code §65.705 states: "All repair work shall be done within an enclosed building."



Factual basis for imposition of \$1,000.00.00 matrix penalty:

Violation #1:

On October 4, 2024, at 10:49 a.m., Inspector Allan Vang conducted an inspection after receiving a complaint. Inspector Vang spoke to Manny who stated he works for Import Auto Enterprise Inc the person in charge of the business is Moe, the license holder of M F K Enterprise. Inspector Vang asked Manny if he could call the licensed holder to inform him that Inspector Vang is on site to conduct an inspection. Inspector Vang asked Manny if he had any questions or concerns before proceeding with the inspection. Manny stated that he does not have any concerns, but he mentioned M F K Enterprise employees will clean up the exterior and remove all vehicles that is in violation(s). Inspector Vang explained to Manny and the M F K Enterprise employees they cannot move vehicles, park on the public road or surrounding areas. Inspector Vang also stated that all vehicles associated with the business must be parked on the business property per license conditions. Manny understood the instructions by the employees replied back stating it is the public road so they could park any vehicles there if they choose to do so. With that being said, the employees of M F K Enterprise advised Inspector Vang that nothing could be done about it.

M F K Enterprise employees proceeded to move vehicles and parked the vehicles in the public right-of-way, and surrounding areas. Inspector Vang once again informed Manny and the employees they are not to park any vehicles that are associated with the business on the public right of way, side of the road, or surrounding areas. An M F K Enterprise employee then responded, "nothing you can do, take all the pictures you want." Inspector Vang continued his inspection, he witnessed the employees proceeding to move vehicles and parked the vehicles on Robert Street, Winona Street, and Wyoming Street. Vehicles were also parked in the drive lane and they were not parked according to the approved site plan dated 2/3/2000. The parking lot striping seemed to be faded and also missing in some areas with no proper parking signage according to the license conditions. There were also two damaged vehicles parked in the parking lot, one damage vehicle was sitting on a jack stand with front end damage and one vehicle was covered with damage and missing parts. One of the M F K Enterprise employees responded back "it had been there for a while like that."

Violation #2:

Inspector Vang continued his inspection where he noticed exterior storage of vehicle parts, rubbish, along with tools. Inspector Vang also noticed employee's inspection vehicles outside in the parking lot and around the property of the business.

On, November 14, 2024, Inspector Allan Vang and Inspector Joseph Voyda, noticed a black truck that had multiple vehicles on a transport trailer which was parked in the middle of the road on Robert Street. The truck was parked in front of Import Auto Enterprise Inc & M F K Enterprise on 830 Robert Street South. Inspector



Vang and Inspector Voyda also noticed the business was not open upon the time of their arrival. There were several vehicles that belonging to both businesses which were parked on the public road and surrounding area.

Inspector Voyda and Inspector Vang approached the business and took photos of the violations. Inspector Vang continues his inspection of the business area to find more violations throughout the property. There were auto related parts, rubbish, food scraps, motor oil and chairs around the exterior of the business along with vehicles that were not parked according to the approved site plan dated 2/3/2000.

Inspector Vang continued his inspection and noticed vehicles that were parked on the public road which belonged to the business. One of the M F K Enterprise employees helped to unload the vehicle off the transport vehicle and back it into the side street. The employee then proceeded to work on getting the car started. The employee was unable to start the car after he retreated a jumper pack from a red vehicle that was parked on the side street and left the scene. The employee proceeded back to the business parking lot where he then spoke with Inspector Voyda.

Violation #3:

On July 1, 2024, Inspector Vang sent a correction notice to licensee indicating that there were violations discovered from the May 3, 2024, inspection and required rectification by July 12, 2024, at which time, or shortly thereafter, a re-inspection would take place. The correction notice further stated "A request to extend this deadline may be submitted in writing to allan.vang@ci.stpaul.mn.us or mailed to 375 Jackson Street, Suite 220, Saint Paul, MN 55101 and must include a reason for extension."

The July 1, 2024, correction notice also described that the failure to correct the violations (License condition 1, 2, 4, and 5) prior to re-inspection may result in adverse action against all licenses issued at the location up to and including license revocation. According to the correction notice, the following violations were discovered:

- License Condition 1: Vehicles not parked in accordance with the approved site plan dated 2/3/200.
- License Condition 2: Must provide maneuvering lane at all time.
- License Condition 4: All repair must be conducted inside an enclosed building.
- License Condition 5: No exterior storage, and be in accordance with the Ramsey County Hazardous Waste-Tires, trash, oil, etc.

In conclusion, the reason for imposition of conditions and revised language for explanation is summarized below:



- Complaint inspections observations of violations prove that this property has an impact of the neighboring surrounding areas safety and welfare of the public peace due to nuisances that are being created by the business.
- Outdated license conditions to implement current language for on street parking, outdoor storage and delivery of vehicles to the licensed premises.
- Removal of language and conditions that will no longer apply.

Current License Conditions

1. The number of vehicles on the lot for sale shall not exceed (20) twenty. There shall be (8) eight customer/employee parking spaces provided on the property. The arrangement of sales display area and off-street parking shall be as shown on site plan on file with DSI.
2. A drive lane shall be maintained open for thru vehicle as shown on the site plan.
3. Vehicles shall not project into or be parked on public streets or boulevards. The post and chain barrier restraint device must be maintained along the property line on Winona to prevent encroachment into the public area.
4. All repair and servicing of vehicles shall be conducted inside the building and not on the exterior of the lot or on the public streets or boulevards.
5. There shall be no exterior storage of vehicle parts.
6. Storage of vehicle fluids batteries, etc., shall be in accordance with the Ramsey County Hazardous Waste Regulations.
7. The dumpster must be stored on the property in an area of the site which is not required for customer parking or maneuvering.
8. Licensee shall monitor noise of equipment required for servicing vehicles. Overhead doors shall be kept closed when using noise producing tools.
9. Customer/employee parking spaces shall be designated with painted lines on parking surface and with appropriate signage delineating these spaces for the intended use. Striping of parking to be completed by July 1, 2000.

Amended/Proposed License Conditions:

1. **The number of vehicles on the lot for sale shall not exceed (20) twenty. There shall be (8) eight customer/employee parking spaces provided on the property. The arrangement of sales display area and off-street parking shall be as shown on site plan on file with DSI.**
2. **Customer/employee parking spaces shall be designated with painted lines on parking surface and with appropriate signage delineating these spaces for the intended use. Striping of parking spaces must be maintained.**
3. **A drive lane shall be maintained open for thru vehicle access as shown on the site plan.**



4. The delivery or towed or trailered vehicles shall take place entirely within the approved site plan and cannot take place in the public right-of-way (e.g., street, alley, sidewalk, boulevard, etc.).
5. The post and chain barrier restraint device must be maintained along the property line in Winona to prevent encroachment into the public area.
6. No customer vehicles under the control of the licensee can be parked and or stored in the public right-of way (e.g., street, alley, sidewalk, boulevard, etc.) This includes vehicles waiting for repairs and vehicles waiting to be picked up by the customer.
7. All repair and servicing of vehicles shall be conducted inside the building and not on the exterior of the lot or in the public streets, alley, sidewalk, boulevards etc.
8. There shall be no exterior storage of vehicle parts, tires, oil or any other materials. Storage of vehicle fluids, batteries, etc., shall be in accordance with the Ramsey County Hazardous Waste regulations.
9. The dumpster must be stored on the property in an area of the site which is not required for customer parking or maneuvering.
10. Licensee shall monitor noise of equipment required for servicing vehicles. Overhead doors shall be kept closed when using noise producing tools.

Adverse Action Recommendation:

The Department of Safety and Inspections will recommend a \$1,000.00 matrix penalty for violating license conditions 1, 2, 4, and 5.

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 **February 20th, 2025**, I will presume that you have chosen not to contest the proposed adverse action and the matter will be placed on the City Council Consent agenda for imposition of the \$1,000.00 matrix penalty.
2. You can pay the \$1,000.00 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 **February 20th, 2025**. A self-addressed envelope is enclosed for your convenience. Payment of the \$1,000.00 matrix penalty will be considered an admission to the violation and waiver of the hearing to which you are entitled.
3. If you wish to admit the facts but you contest the \$1,000.00 matrix penalty, you may have a hearing before the Saint Paul City Council. You will need to send me a letter with a statement admitting to the



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facts and requesting a Council hearing no later than **February 20th, 2025**. The matter will then be scheduled before the City Council to determine whether to impose the 1,000.00 matrix penalty. You will have an opportunity to appear before the Council and make a statement on your own behalf.

4. 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 **February 20th, 2025**. 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 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 § 310.03 (k).

If you have not contacted me by February 20th, 2025, I will assume that you do not contest the imposition of the \$1,000.00 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 contact my Paralegal Riddhi Mistry at riddhi.mistry@ci.stpaul.mn.us , (651) 266-8835.

Sincerely,

Sly Onyia
Assistant City Attorney
License No. 0402320

Cc: Moe Faryaneh Kia, 9133 Utica Avenue South, Bloomington, MN 55437
Mohammad Bagher Abedi & Mostafa Kia, 830 Robert Street South, Saint Paul, MN 55107-3232
Monica Bravo, Executive Director, West Side Community Organization, 209 Page Street West, Saint Paul, MN 55107.



Attachments: City of Saint Paul Department of Safety and Inspections Complaint – 5/3/2024
Correction Notice – 7/1/2024
Mailing Envelope to Licensee – 7/8/2024
Inspector's Report – 10/3/2024
Inspector's Report – 11/14/2024
City of Saint Paul Department of Safety and Inspections Complaint – 11/20/2024
License Group Conditions Text – 11/21/2024
Property Diagram
Proposed License Conditions
Removal of Language for License Conditions and Added Proposed License Conditions
Amended Proposed License Conditions
Ordinance Basis for Imposition of License Conditions and Reasoning Explanations
Photo Evidence
Saint Paul Legislative Code §310.01
Saint Paul Legislative Code §310.04(b)(5)
Saint Paul Legislative Code §310.04(b)(6)(a)
Saint Paul Legislative Code §310.04(b)(6)(c)
Saint Paul Legislative Code §310.04(b)(7)
Saint Paul Legislative Code §310.04(b)(8)
Saint Paul Legislative Code §310.04(c)(1)
Saint Paul Legislative Code §310.04(c)(2)
Saint Paul Legislative Code §310.04(c)(3)
Saint Paul Legislative Code §310.04(c)(4)
Saint Paul Legislative Code §310.04(c)(6)
Saint Paul Legislative Code §65.705



City of Saint Paul

City Hall and Court
House
15 West Kellogg
Boulevard
Phone: 651-266-8560

Signature Copy

Resolution-Public Hearing: RES PH 18-331

File Number: RES PH 18-331

Approving adverse action against the Auto Repair Garage and Second-Hand Dealer-Motor Vehicle licenses held by M F K Enterprises, Inc., d/b/a M F K Enterprise located at 830 Robert Street South.

WHEREAS, the Auto Repair Garage and Second-Hand Dealer-Motor Vehicle licenses held by M F K Enterprises, Inc. d/b/a M F K Enterprise (License ID# 0057957) for the premises located at 830 Robert Street South were the subject of a Notice of Violation dated September 25, 2018; and

WHEREAS, the Notice stated that during an inspection of the licensed premises on June 21, 2018 and a re-inspection on June 28, 2018, an inspector from the Department of Safety and Inspections (DSI) observed and documented with photographs three (3) license condition violations; and

WHEREAS, this was first violation so pursuant to Saint Paul Legislative Code § 310.05 (m) (1), the licensing office recommended a \$500.00 matrix penalty; and

WHEREAS, the licensee responded to the Notice of Violation to request a public hearing which was held on November 7, 2018; now therefore be it;

RESOLVED, M F K Enterprises, Inc. d/b/a M F K Enterprise (License ID# 0057957) for the premises located at 830 Robert Street South is hereby ordered to pay a matrix penalty of \$500.00 for the three (3) license condition violations observed and documented by a DSI Inspector during an inspection of the licensed premises on June 21, 2018 and June 28, 2018.

~~Payment of such penalty shall be made within thirty (30) days of the date of the adoption of this resolution.~~

Said penalty will be stayed for a period of six (6) months pending no same or similar violations.

At a meeting of the City Council on 11/7/2018, this Resolution-Public Hearing was Passed.

Yea: 7 Councilmember Bostrom, Councilmember Brendmoen, Councilmember Thao, Councilmember Tolbert, Councilmember Noecker, Councilmember Prince, and Councilmember Jalali

Nay: 0

Vote Attested by
Council Secretary Shari Moore

Shari Moore

Date 11/7/2018

Approved by the Mayor 
Melvin Carter III

Date 11/12/2018

Clerk 
Shari Moore

Date _____

Test Signature 
Shari Moore

Date _____



City of Saint Paul

City Hall and Court
House
15 West Kellogg
Boulevard
Phone: 651-266-8560

Signature Copy

Resolution: RES 20-795

File Number: RES 20-795

Approving adverse action against the Auto Body Repair Garage and Second Hand Dealer License application held by M F K Enterprises Inc., d/b/a M F K Enterprises (License ID# 0057957) at 830 Robert Street.

WHEREAS, the Auto Body Repair Garage and Second Hand Dealer license held by M F K Enterprises Inc. d/b/a M F K Enterprises (License ID# 0057957) for the premises located at 830 Robert Street in Saint Paul were the subject of a Notice of Violation dated April 3, 2020; and

WHEREAS, the Notice stated that the Department of Safety and Inspections received a complaint of violations of (2) license conditions on February 10, 2020; and

WHEREAS, an inspection of the Licensed Premises was conducted on February 10, 2020 and the violations were confirmed; and

WHEREAS, the licensee was sent a Correction letter on February 18, 2020 detailing these violations and giving him until February 24, 2020 to bring the licensed premises into compliance with his license conditions; and

WHEREAS, On February 27, 2020, DSI inspector returned for a re-inspection and observed and documented with photographs the same two (2) license condition violations; and

WHEREAS, as this is the first (1st) violation within twelve (12) months, pursuant to Saint Paul Legislative Code § 310.05 (m) (1), the licensing office recommended a \$500.00 matrix penalty; and

WHEREAS, the City did not receive the licensee's response to the Notice of Violation and set this matter on the June 3, 2020 consent agenda for approval of the recommended remedy; and

WHEREAS, the licensee ~~did not respond~~ responded to the Notice of Violation on June 3, 2020 by requesting a public hearing; and ~~or Administrative hearing; so therefore, be it~~

WHEREAS, this matter was laid over until June 17, 2020 for a public hearing; and

WHEREAS, the licensee appeared and testified at the public hearing on June 17, 2020 regarding the measures he has taken to address violations, including the removal of debris and tires dumped by others; so therefore, be it

RESOLVED, the first time penalty recommended by the Department of Safety and Inspections is imposed against the Auto Body Repair Garage and Second Hand Dealer license held by M F K Enterprises Inc. d/b/a M F K Enterprises (License ID# 0057957) for the premises located at 830 Robert Street in Saint Paul but the \$500.00 matrix penalty is stayed for one year as long as there are no same or similar license violations. ~~is hereby ordered to pay a matrix penalty of \$500.00 for two (2) repeat license condition violations observed and documented by a DSI Inspector. Payment of such~~

~~penalties shall be made within thirty (30) days of the date of the adoption of this resolution.~~

At a meeting of the City Council on 6/17/2020, this Resolution was Passed.

Yea: 7 Councilmember Brendmoen, Councilmember Thao, Councilmember Tolbert, Councilmember Noecker, Councilmember Prince, Councilmember Jalali, and Councilmember Yang

Nay: 0

Vote Attested by
Council Secretary



Shari Moore

Date 6/17/2020

Approved by the Mayor



Melvin Carter III

Date 6/23/2020

Clerk



Shari Moore

Date _____

Test Signature



Shari Moore

Date _____



City of Saint Paul

City Hall and Court
House
15 West Kellogg
Boulevard
Phone: 651-266-8560

Signature Copy

Resolution: RES 24-23

File Number: RES 24-23

Approving adverse action and imposition of a \$500 Matrix Penalty against the Auto Repair Garage and Second Hand Dealer Motor licenses held by M F K Enterprise Inc. d/b/a M F K Enterprise for the premises located at 830 Robert Street South (License ID #200057957).

WHEREAS, the Auto Repair Garage and Second Hand Dealer Motor licenses held by M F K Enterprise Inc. d/b/a M F K Enterprise for the premises located at 830 Robert Street South in Saint Paul (License ID #200057957) was the subject of a Notice of Adverse Action and Request for imposition of a \$500 Matrix Penalty ("Notice"), herein incorporated as Exhibit 1, dated November 16, 2023; and

WHEREAS, the Notice stated that the Department of Safety and Inspections was recommending Adverse Action and imposition of the standard matrix penalty after the a complaint based inspection showed a number of violations of license conditions; and

WHEREAS, the Notice stated that:

- An inspection of the licensed premises was conducted on July 17, 2023, due to a complaint submitted to the Department of Safety and Inspections (DSI).
- The following violations were discovered during the inspection: vehicles were not parked in accordance with the site plan filed with DSI and the licensed premises did not provide a maneuvering lane.
- The violations were related to the agreed upon licensed conditions.
- The licensee was given a Correction Notice indicating that the violations needed to be fully corrected on or before August 8, 2023, at which time, or shortly thereafter, a re-inspection would take place.
- On August 9, 2023, Inspector Vang returned to the licensed premises for a re-inspection and observed and photographed cars parked in violation of the license conditions #1 and #2. Inspector Vang spoke with Mohammed Abedi. Inspector Vang introduced himself as a licensing inspector for the City of Saint Paul DSI. Inspector Vang explained to Mr. Abedi the reason for the visit was a re-inspection from an earlier inspection held on July 17, 2023. Inspector Vang handed a copy of the site plant to Mr. Abedi, the correction notice, and the license conditions. Inspector Vang asked if Moe Faryaneh, the license holder for M F K Enterprise, was there that day. Mr. Abedi proceeded to call Mr. Faryaneh and informed him of the situation. Inspector Vang continued his inspection and observed vehicles parked on the side of the building and a vehicle parked in front of the garage door. Inspector Vang educated Mr. Abedi that these vehicles were in violation for not being parked in accordance with the approved site plan. Mr. Abedi stated that he had brought his side of the business into compliance with the city's request and did not want to be in violation due to Mr. Faryaneh's violations on his side of the business; and



WHEREAS, the Notice gave the Licensee the following 4 options:

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 **November 27, 2023**, I will presume that you have chosen not to contest the proposed adverse action and the matter will be placed on the City Council Consent Agenda for approval of the proposed remedy.
2. You can admit to the violation and pay the \$500.00 matrix penalty. If this is your choice, send the payment directly to DSI at 375 Jackson Street, Ste. 220, St. Paul, Minnesota 55101-1806 no later than **November 27, 2023**. A self-addressed envelope is enclosed for your convenience. Payment of the \$500.00 matrix penalty will be considered a waiver of the hearing to which you are entitled.
3. If you wish to admit the facts but you contest the \$500.00 matrix 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 no later than **November 27, 2023**. The matter will then be scheduled before the City Council to determine whether to impose the \$500.00 matrix penalty. You will have an opportunity to appear before the Council and make a statement on your own behalf.
4. 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 **November 27, 2023**. 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; and

WHEREAS, the Notice further stated that:

If you have not contacted me by November 27, 2023, I will assume that you do not contest the imposition of the \$500.00 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 contact Alan Tellez Berkowitz, my Law Clerk at alan.tellez.berkowitz@ci.stpaul.mn.us <<mailto:alan.tellez.berkowitz@ci.stpaul.mn.us>> and

WHEREAS, on November 29, 2023, the licensee sent an email, herein incorporated as Exhibit 2, to City Attorney Law Clerk, Alan Tellez Berkowitz alleging that he had not gotten the Notice until after the Thanksgiving holiday and that he had come into the City Attorney's Office on November 29, 2023, and requested option #3 - an "explanation in front of city council", and requested all of the violation photos; and

WHEREAS, on December 1, 2023, City Attorney Law Clerk, Alan Tellez Berkowitz sent an email to the Licensee, herein incorporated as Exhibit 3, asking for clarification as to whether or not the Licensee admitted the facts as alleged in the Notice; and

WHEREAS, on December 1, 2023, the License responded to City Attorney Law Clerk, Alan Tellez Berkowitz, response is herein incorporated as Exhibit 4, telling him that he admitted that a violation happened, but alleged that the violation was not his fault and attempted to blame a neighboring business and asked for "all of the photos"; and

WHEREAS, on December 1, 2023, City Attorney Law Clerk, Alan Tellez Berkowitz responded to the Licensee by email, herein incorporated as Exhibit 5, telling him that to appear before City Council he "must admit that you are responsible for the violation and that you allowed those cars to park in violation of your license conditions." and resending the Notice of Violation packet to the Licensee with all of the photos; and

WHEREAS, on December 5, 2023, the Licensee sent City Attorney Law Clerk, Alan Tellez Berkowitz and email, herein incorporated as Exhibit 6, that seemed to bring up defenses to the violations alleged in the Notice but ended with "I look forward to explaining the situation in front of the council and to do our best for the future"; and

WHEREAS, on December 6, 2023, City Attorney Law Clerk, Alan Tellez Berkowitz, again emailed the Licensee, email herein incorporated as Exhibit 7, to clarify that in order to appear before City Council, he needed to make sure that the Licensee was admitting the violations and asking the Licensee what he wanted to do; and

WHEREAS, on December 13, 2023, City Attorney Law Clerk, Alan Tellez Berkowitz, again emailed the Licensee, email herein incorporated as Exhibit 8, because he had not heard back from the Licensee, City Attorney Law Clerk, Alan Tellez Berkowitz laid out the choices that the Licensee had and requested that the Licensee respond to Assistant City Attorney, Therese Skarda by Friday December 15th. The email also stated that if the Licensee did not respond by Friday December 15th, the matter would be placed on the consent agenda; and

WHEREAS, the Licensee did not respond to Assistant City Attorney Therese Skarda; and now, therefore, be it

RESOLVED, the \$500 matrix penalty is hereby imposed against the Auto Repair Garage and Second Hand Dealer Motor licenses held by M F K Enterprise Inc. d/b/a MFD Enterprise for the premises located at 830 Robert Street South in Saint Paul under License ID #200057957.

At a meeting of the City Council on 1/10/2024, this Resolution was Passed.

Yea: 7 Councilmember Noecker, Councilmember Jalali, Councilmember Yang, Councilmember Kim, Councilmember Bowie, Councilmember Jost, and Councilmember Johnson

Nay: 0

Vote Attested by
Council Secretary



Shari Moore

Date 1/10/2024

Approved by the Mayor



Melvin Carter III

Date 1/12/2024

Folder #: 2024 033424 LIC

PIN: 082822340103

Status: Under Review

In Date: 5/2/24

Ward: 2

Zoning: B2

Subtype: License

Dist Council: 3

Owner:

Worktype: Complaint

Census Tract: 37200

Mohammad Bagher Abedi/Mostafa Kia

Census Block: 2001

830 Robert St S St Paul MN 55107- 3232

Homesteader: Mohmmad Bagher Abedi

Tax Owner: 830 Robert St S St Paul MN 55107- 3232

Complaint Location:

830 ROBERT ST S

Legal Desc: AUDITOR'S SUB OF L6 BIDWELLS EX ST LOT 8 AND ALL OF LOT 9

Complainant:

Details:

Number of vehicles exceed 28

Working on vehicles on Winona and in the parking lot

Vehicle parts storage outside

Business Vehicles parked on both side Winona obstructing the flow of traffic and blocking resident's driveways from Robert Street to address 126 Winona

This complaint has been referred to the following departments:

DSI Licensing Response - Scheduled Date: 5/2/24

Comment:

Inspector Assigned: Allan Vang, Phone: 651- 266- 1915

Results

Entered By

Comment

EXHIBIT

5



SAINT PAUL
SAFETY & INSPECTIONS

DEPARTMENT OF SAFETY & INSPECTIONS (DSI)
ANGIE WIESE, DIRECTOR

375 Jackson Street, Suite 220
Saint Paul, MN 55101-1806
Tel: 651-266-8989 | Fax: 651-266-9124

July 1, 2024

Moe Faryaneh Kia
830 Robert Street South
St Paul, MN 55107

CORRECTION NOTICE

**RE: Auto Repair Garage/Second Hand Dealer-Motor Vehicle - License ID 200057957 - 830 Robert Street South
- DBA: M F K Enterprise**

Moe,

The above referenced property was inspected on 5/3/2024, due to a complaint submitted to the City of Saint Paul Department of Safety and Inspections (DSI). The following violation(s) discovered during the inspection must be fully corrected on or before 7/12/2024, at which time, or shortly thereafter, a re-inspection will take place. A request to extend this deadline may be submitted in writing to allan.vang@ci.stpaul.mn.us or mailed to 375 Jackson Street, Suite 220, Saint Paul, MN 55101 and must include a reason for extension.

Failure to fully correct the violation(s) noted below prior to re-inspection may result in adverse action against all licenses issued at the location up to and including license revocation.

Violation(s) discovered:

- License Condition 1: Vehicles not parked accordance with the approved site plan dated 2/3/2000
- License Condition 2: Must provide maneuvering lane at all time
- License Condition 4: All repair must be conducted inside an enclosed building
- License Condition 5: No exterior storage, and be in accordance with the Ramsey County Hazardous Waste - Tires, trash, oil, etc

Section 65.705 paragraph (c) of the Saint Paul Legislative Code requires/states that: All repair work shall be done within an enclosed building.

NOTE: License conditions for the property are listed on the reverse side of this document.

If you have questions regarding this matter or wish to request additional information, I may be reached at phone number 651-266-1915.

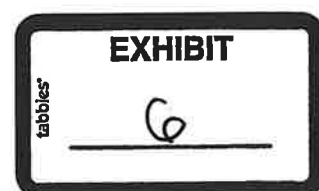
Respectfully,

Allan Vang
Inspector, DSI Licensing

C: 9133 Utica Avenue South- Bloomington, MN 55437

CITY OF SAINT PAUL
MELVIN CARTER, MAYOR

AN AFFIRMATIVE ACTION &
EQUAL OPPORTUNITY EMPLOYER



Folder #: 2024 076499 LIC

PIN: 082822340103

Status: Under Review

In Date: 9/11/24

Ward: 2

Zoning: B2

Subtype: License

Dist Council: 3

Owner:

Worktype: Complaint

Census Tract: 37200

Mohammad Bagher Abedi/Mostafa Kia

Census Block: 2001

830 Robert St S St Paul MN 55107- 3232

Homesteader: Mohmmad Bagher Abedi

Tax Owner: 830 Robert St S St Paul MN 55107- 3232

Complaint Location:

830 ROBERT ST S

Legal Desc:

AUDITOR'S SUB OF L6 BIDWELLS EX ST LOT 8 AND ALL OF LOT 9

Complainant:

Details:

parking all the customer vehicles in the street

11/7/2024 Business parking vehicles on Street and working on them on the street.

This complaint has been referred to the following departments:

DSI Licensing Response - Scheduled Date: 9/11/24

Comment:

Inspector Assigned: Allan Vang, Phone: 651- 266- 1915

Results

10/3/24 Under Review

Entered By

Vang, Allan

Comment

Complaint inspection completed. In violation of LC. Under review

Comment:

Inspector Assigned: Allan Vang, Phone: 651- 266- 1915

Results

11/14/24 Under Review

Entered By

Vang, Allan

Comment

Complaint inspection with JNV completed. Found in violation of LCs and currently under review.

Comment:

Inspector Assigned: Allan Vang, Phone: 651- 266- 1915

Results

10/9/24 Under Review

Entered By

Vang, Allan

Comment

Inspector's report, photos, and photo of vehicles was sent to EH & JVN for review

EXHIBIT

tabbles

7



Inspector's Report

Inspectors Name: Allan Vang

Date & Time: 10/3/2024 at 10:49 am Staff Member's Name: Manny (Import Auto Enterprise Inc)

Business/DBA Name: Import Auto Enterprise Inc & M F K Enterprise

Property Address: 830 Robert Street South

Reason for Visit: Complaint Inspection

Observations: Exterior and surrounding business property

Photos Taken: ☒ Yes ☐ No – Area(s) of where the Photo(s) where taken: Exterior and surrounding of business property

Action Taken: ☐ Education ☐ warning

☒ Request for Adverse Action

Other: _____

Details of Conversations (Statements to and by Person Responsible for Property):

I met with Manny who stated he work for Import Auto Enterprise Inc., and also the person in charge of the business as Moe who is the license holder for M F K Enterprise is currently not there. I introduced myself as Allan Vang, a Licensing Inspector for the City of Saint Paul Safety and Inspections (DSI). I explained to Manny that DSI had received a complaint so I'm doing a follow-up inspection. I had asked if Manny could call and let the license holder know that I'm on-site for inspection. I asked Manny if he have any questions or concerns before I continued my inspection. Manny stated he does not but will have the employees from M F K Enterprise business clean up the exterior and remove all vehicles that is in violation(s). I explained to Manny and the M F K Enterprise employees that they cannot move vehicles and parked on the public road or surrounding areas, and all vehicle associated with the business must be parked on the business property per license conditions. Manny stated he understand but the employees replied back that it is the public road so they could parked any vehicles there if they choose to do so and there is nothing I could do about it.

M F K Enterprise's employees started to move vehicles and parked in the public right-away and surrounding area. I again, informed Manny and the employees that they are not to parked any vehicles that is associated with the business on the public right away, side of the road,



Page 2 of Inspection Report:

or surrounding areas. With a quick respond from one of M F K Enterprise's employee, " nothing you can do, take all the pictures you want." I continued my inspection where I witnessed employees continued to move vehicles and parked on the street (Robert Street both side, Winona Street, and Wyoming Street). There was vehicles parked in the drive lane and was not parked according to the approved site plan dated on 2/3/2000. Parking lot striping is not there or in some area is faded away along with no proper parking signage according to license condition. There was two damaged vehicle that is parked on the outside parking lot. One damage vehicle was sitting on jack stand with front end damage and one vehicle that is covered over with damage and missing parts, which one of M F K Enterprise employee replied back that it had been there for awhile like that.

I continued my inspection where there was exterior storage of vehicle parts, rubbish, along with tools, and employees inspecting vehicles outside in the parking lot and around the property of the business.

Summary of Observations

Complaint Inspection Held On 10/3/2024

Photo # 1) License Condition # 2. A drive lane shall be maintained open for thru vehicle access as shown on the site plan.

- **Brief Description of Violation** - Not parked according to the approved site plan dated on 2/3/2000

Photo # 2) License Condition # 4. All repair and servicing of vehicles shall be conducted inside the building and not on the exterior of the lot or on the public streets or boulevards.

- **Brief Description of Violation** - Repairing vehicle on the exterior of the parking lot- Vehicle is on a jack stand

Photo # 3) License Condition # 2. A drive lane shall be maintained open for thru vehicle access as shown on the site plan.

- **Brief Description of Violation** - Not parked according to the approved site plan dated on 2/3/2000

Photo # 4) License Condition # 9. Customer/employee parking spaces shall be designated with painted lines on parking surface and with appropriate signage delineating these spaces for the intended use. Striping of parking to be completed by July 1, 2000.

- **Brief Description of Violation** - Customer/employee parking spaces striping are fading or partial missing and missing appropriate signages

Photo # 5) License Condition # 5. There shall be no exterior storage of vehicle parts.

- **Brief Description of Violation** - Vehicle seats were left in the parking lot

Photo # 6) License Condition # 5. There shall be no exterior storage of vehicle parts.

- **Brief Description of Violation** - Vehicle seat and vehicle auto parts boxes were left in the exterior corner of the building

Photo # 7) License Condition # 1. The number of vehicles on the lot for sale shall not exceed (20) twenty. There shall be (8) eight customer/employee parking spaces

provided on the property. The arrangement of sales display area and off-street parking shall be as shown on site plan on file with DSI.

License Condition # 5. There shall be no exterior storage of vehicle parts.

- **Brief Description of Violation** – Exterior storage of vehicle parts and vehicle not parked according to approved site plan dated 2/3/2000

Photo # 8) License Condition # 5. There shall be no exterior storage of vehicle parts.

- **Brief Description of Violation** – Exterior storage of auto parts

Photo # 9) License Condition # 5. There shall be no exterior storage of vehicle parts.

- **Brief Description of Violation** – Exterior storage of auto parts

Photo # 10) License Condition # 5. There shall be no exterior storage of vehicle parts.

- **Brief Description of Violation** – Exterior storage of auto parts

Photo # 11) License Condition # 1. The number of vehicles on the lot for sale shall not exceed (20) twenty. There shall be (8) eight customer/employee parking spaces provided on the property. The arrangement of sales display area and off-street parking shall be as shown on site plan on file with DSI.

Brief Description of Violation - Not parked according to the approved site plan dated on 2/3/2000

Photo # 12) License Condition # 4. All repair and servicing of vehicles shall be conducted inside the building and not on the exterior of the lot or on the public streets or boulevards.

- **Brief Description of Violation** - Repairing vehicle on the exterior of the parking lot- Vehicle is covered

Complaint Inspection on 10/3/2024

Photo # 1



10/3/2024 Complaint Inspection CS - 24-076499

License Condition Violation# 2.

Brief Description of Violation - Not parked according to the approved site plan dated on 2/3/2000

Photo # 2



10/3/2024 Complaint Inspection CS - 24-076499

License Condition Violation# 4.

Brief Description of Violation - Repairing vehicle on the exterior of the parking lot – Vehicle is on a jack stand

Photo # 3



10/3/2024 Complaint Inspection CS - 24-076499

License Condition Violation# 2.

Brief Description of Violation - Not parked according to the approved site plan dated on 2/3/2000

Photo # 4



10/3/2024 Complaint Inspection CS - 24-076499

License Condition Violation# 9.

Brief Description of Violation - Customer/employee parking space striping are fading or partial missing and missing appropriate signages

Photo # 5



10/3/2024 Complaint Inspection CS - 24-076499

License Condition Violation# 5.

Brief Description of Violation - Vehicle seats were left in the parking lot

Photo # 6



10/3/2024 Complaint Inspection CS – 24-076499

License Condition Violation# 6.

Brief Description of Violation - Vehicle seat and vehicle auto parts boxes were left in the exterior corner of the building

Photo # 7



10/3/2024 Complaint Inspection CS - 24-076499

License Condition Violation# 1 & 5.

Brief Description of Violation - Exterior storage of vehicle parts and vehicle not parked according to approved site plan dated 2/3/2000

Photo # 8



10/3/2024 Complaint Inspection CS - 24-076499

License Condition Violation# 5.

Brief Description of Violation - Exterior storage of auto parts

Photo # 9



10/3/2024 Complaint Inspection CS - 24-076499

License Condition Violation# 5.

Brief Description of Violation - Exterior storage of auto parts

Photo # 10

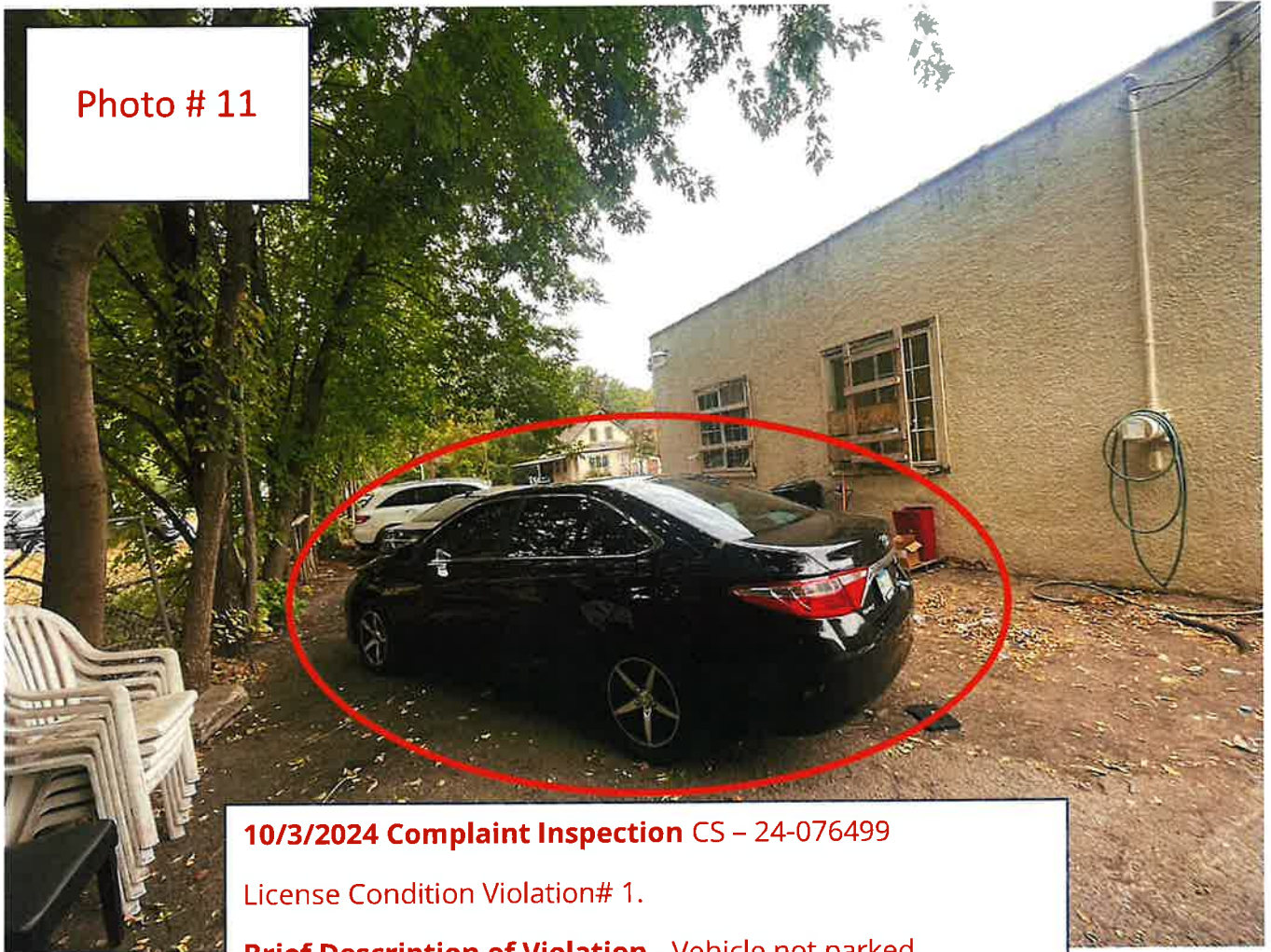


10/3/2024 Complaint Inspection CS – 24-076499

License Condition Violation# 5.

Brief Description of Violation - Exterior storage of auto parts

Photo # 11



10/3/2024 Complaint Inspection CS – 24-076499

License Condition Violation# 1.

Brief Description of Violation - Vehicle not parked according to approved site plan dated 2/3/2000



10/3/2024 Complaint Inspection CS – 24-076499

License Condition Violation# 4.

Brief Description of Violation - Repairing vehicle on the exterior of the parking lot – Vehicle is covered



Inspector's Report

Inspectors Name: Allan Vang
Date & Time: 11/14/2024 at 10:04 am Staff Member's Name: MFK Employees- Ali & Manuez
Business/DBA Name: Import Auto Enterprise Inc & M F K Enterprise
Property Address: 830 Robert Street South
Reason for Visit: Complaint Inspection
Observations: Exterior and surrounding business property

Photos Taken: ☒ Yes ☐ No – Area(s) of where the Photo(s) where taken: Exterior and surrounding of business property

Action Taken: ☐ Education ☐ warning
☒ Request for Adverse Action

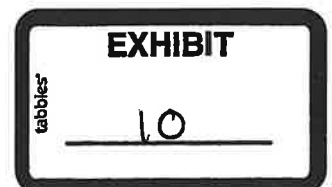
Other: _____

Details of Conversations (Statements to and by Person Responsible for Property):

Upon arrival with Inspector Joseph Voyda, we noticed a black truck that has multiple vehicles on a transport trailer parked in the middle of the road (Robert Street) in front of the business of Import Auto Enterprise Inc & M F K Enterprise - 830 Robert Street South. We also noticed that the business was not open at the time of our arrival. There was several vehicle that appear to belong to the two business parked on the public road and surround area.

Inspector Voyda and I approached the business and took photos of violations that we noticed right away. I continued my inspection of the business area to find more violations around the property. There was auto related parts, rubbish, food scrap, motor oil, and chairs on the exterior of the business along with vehicles that was not parked according to approved site plan dated 2/3/2000.

Continued my inspection to vehicles that was parked on public road that belong to the business. One of M F K Enterprise's employee helped unloaded a vehicle off the transport vehicle and backed into the side street where he started to work on to get the car started. The employee was unable to start the car after he retreated a jumper pack from a red vehicle that was parked on the side street and left the scene to come back to the business parking lot where he spoke with Inspector Voyda.



Summary Report 6/3/2025

830 Robert Street South - DBA: M F K Enterprise

Inspection Time & Date: 10:04am on 11/14/2024

Per the request from the City of Saint Paul's City Attorney's Office, more specifically Deputy City Attorney Therese Skarda, that the below mentioned information is true to the best of my knowledge of the violations and statements that took place during an inspection on 11/14/2024.

Upon arrival of the licensed premises, I observed a parked car carrier trailer in the middle of Robert Street South.

Shortly after arrival, I introduced myself as an Inspector for the City of Saint Paul for the Department of Safety & Inspections (DSI) to the manager Ali, I advised Ali that the reason that DSI is here today is for numerous complaints received. I asked Ali if he was the manager for MFK, he stated no, I asked him why he came from MFK's door, then he stated he was the manager for MFK. There was also another employee present that did not give a name from Import Auto's. I advised this employee that Import Auto's has a vehicle (Gray Toyota C-HR with no license plate) not parked in accordance with the approved site plan and that he has the opportunity to correct the violation by reparking the vehicle while I was present, he chose to make the on-the-spot correction.

While I was talking to the Import Auto employee, I observed Ali entering the driver side of a black or dark gray JEEP SUV (with no license plate) that was loaded on the mentioned car carrier trailer. Ali slowly backed it off the car carrier trailer backing it in the intersection of Robert Street South and Winona Street East on the West side of Robert Street South. I observed Ali pop the hood and work on the engine after a few minutes Ali then walked down Winona Street about a half block to another vehicle (red PRIUS - MN Lic Plate - KBP-517) that was parked, he retrieved a jumper cable portable pack. Ali returned to the Jeep and jumped off the vehicle to move the vehicle to the property. Once Ali came back to the property, I advised him that he cannot work on vehicles outside the building. He stated, what do you want to do call a tow truck its right there come on man that's ridiculous. I advised him that I or DSI cannot tell him how to conduct his business, but I can tell you how not to conduct your business when it comes to violations that he committed right in front of not one but two licensing inspectors. Further explaining that it is up to the license holder to figure out a safe way of how to transport vehicles to the property to be worked on.

Continuing the inspection, I corresponded with Inspector Vang, he discovered multiple violations of Code and License Conditions. I advised Ali of our findings, silently he shrugged his shoulders and slapped the side of his pants with his hands. I advised him that the license holders would receive something in the mail from the City in the weeks to come and to have a good day.



DSI Inspector Joseph Voyda
6/3/2025



Summary of Observations

Complaint Inspection Held On 11/14/2024

Photo # 1) License Condition # 5. There shall be no exterior storage of vehicle parts.

SPLC 34.08 - Exterior Sanitation. All exterior property areas to be maintained in a clean, safe, and sanitary condition, free from accumulation of garbage, mixed municipal solid waste, animal feces or refuse. Immediately remove improperly stored or accumulated refuse including garbage, rubbish, junk, vehicle parts, wood, metal, recycling materials, household items, building materials, rubble, and/or tires from the property, boulevard, driveway, alley, and yard.

- **Brief Description of Violation** – Auto parts and rubbish stored out in the parking lot and around the sheds

Photo # 2) License Condition # 5. There shall be no exterior storage of vehicle parts.

SPLC 34.08 - Exterior Sanitation. All exterior property areas to be maintained in a clean, safe, and sanitary condition, free from accumulation of garbage, mixed municipal solid waste, animal feces or refuse. Immediately remove improperly stored or accumulated refuse including garbage, rubbish, junk, vehicle parts, wood, metal, recycling materials, household items, building materials, rubble, and/or tires from the property, boulevard, driveway, alley, and yard.

- **Brief Description of Violation** – Auto parts and rubbish stored behind the sheds

Photo # 3) License Condition # 5. There shall be no exterior storage of vehicle parts.

SPLC 34.08 - Exterior Sanitation. All exterior property areas to be maintained in a clean, safe, and sanitary condition, free from accumulation of garbage, mixed municipal solid waste, animal feces or refuse. Immediately remove improperly stored or accumulated refuse including garbage, rubbish, junk, vehicle parts, wood, metal, recycling materials, household items, building materials, rubble, and/or tires from the property, boulevard, driveway, alley, and yard.

- **Brief Description of Violation** – Auto parts and rubbish stored behind the sheds

Photo # 4) Violation, SPLC 34.08 - Exterior Sanitation. All exterior property areas to be maintained in a clean, safe, and sanitary condition, free from accumulation of garbage, mixed municipal solid waste, animal feces or refuse. Immediately remove improperly stored or accumulated refuse including garbage, rubbish, junk, vehicle parts, wood, metal, recycling materials, household items, building materials, rubble, and/or tires from the property, boulevard, driveway, alley, and yard.

- **Brief Description of Violation** – Rubbish stored behind the sheds

Photo # 5) Violation, SPLC 34.08 - Exterior Sanitation. All exterior property areas to be maintained in a clean, safe, and sanitary condition, free from accumulation of garbage, mixed municipal solid waste, animal feces or refuse. Immediately remove improperly stored or accumulated refuse including garbage, rubbish, junk, vehicle parts, wood, metal, recycling materials, household items, building materials, rubble, and/or tires from the property, boulevard, driveway, alley, and yard.

- **Brief Description of Violation** – Rubbish stored outside by the sheds

Photo # 6) Violation, SPLC 34.08 - Exterior Sanitation. All exterior property areas to be maintained in a clean, safe, and sanitary condition, free from accumulation of garbage, mixed municipal solid waste, animal feces or refuse. Immediately remove improperly stored or accumulated refuse including garbage, rubbish, junk, vehicle parts, wood, metal, recycling materials, household items, building materials, rubble, and/or tires from the property, boulevard, driveway, alley, and yard.

- **Brief Description of Violation** – Rubbish stored outside in a 5-gallon bucket that have concrete inside

Photo # 7) Violation, SPLC 34.08 - Exterior Sanitation. All exterior property areas to be maintained in a clean, safe, and sanitary condition, free from accumulation of garbage, mixed municipal solid waste, animal feces or refuse. Immediately remove improperly stored or accumulated refuse including garbage, rubbish, junk, vehicle parts, wood, metal, recycling materials, household items, building materials, rubble, and/or tires from the property, boulevard, driveway, alley, and yard.

- **Brief Description of Violation** – Rubbish stored outside between the two sheds

Photo # 8) Violation, SPLC 34.08 - Exterior Sanitation. All exterior property areas to be maintained in a clean, safe, and sanitary condition, free from accumulation of garbage, mixed municipal solid waste, animal feces or refuse. Immediately remove improperly stored or accumulated refuse including garbage, rubbish, junk, vehicle parts, wood, metal, recycling materials, household items, building materials, rubble, and/or tires from the property, boulevard, driveway, alley, and yard.

- **Brief Description of Violation** – Rubbish stored outside by the sheds

Photo # 9) Violation, SPLC 34.08 - Exterior Sanitation. All exterior property areas to be maintained in a clean, safe, and sanitary condition, free from accumulation of garbage, mixed municipal solid waste, animal feces or refuse. Immediately remove improperly stored or accumulated refuse including garbage, rubbish, junk, vehicle parts, wood, metal, recycling materials, household items, building materials, rubble, and/or tires from the property, boulevard, driveway, alley, and yard.

- **Brief Description of Violation** – Rubbish stored outside between the shed and fence

Photo # 10) Violation, SPLC 34.08 - Exterior Sanitation. All exterior property areas to be maintained in a clean, safe, and sanitary condition, free from accumulation of garbage, mixed municipal solid waste, animal feces or refuse. Immediately remove improperly stored or accumulated refuse including garbage, rubbish, junk, vehicle parts, wood, metal, recycling materials, household items, building materials, rubble, and/or tires from the property, boulevard, driveway, alley, and yard.

- **Brief Description of Violation** – Rubbish left out in the parking lot and by the fence

Photo # 11) Violation, SPLC 34.08 - Exterior Sanitation. All exterior property areas to be maintained in a clean, safe, and sanitary condition, free from accumulation of garbage, mixed municipal solid waste, animal feces or refuse. Immediately remove improperly stored or accumulated refuse including garbage, rubbish, junk, vehicle parts, wood, metal, recycling materials, household items, building materials, rubble, and/or tires from the property, boulevard, driveway, alley, and yard.

- **Brief Description of Violation** – Rubbish left out in the parking lot

Photo # 12) Violation, SPLC 34.08 - Exterior Sanitation. All exterior property areas to be maintained in a clean, safe, and sanitary condition, free from accumulation of garbage, mixed municipal solid waste, animal feces or refuse. Immediately remove improperly stored or accumulated refuse including garbage, rubbish, junk, vehicle parts, wood, metal, recycling materials, household items, building materials, rubble, and/or tires from the property, boulevard, driveway, alley, and yard.

- **Brief Description of Violation** – Rubbish left out in the parking lot

Photo # 13) Violation, SPLC 34.08 - Exterior Sanitation. All exterior property areas to be maintained in a clean, safe, and sanitary condition, free from accumulation of garbage, mixed municipal solid waste, animal feces or refuse. Immediately remove improperly stored or accumulated refuse including garbage, rubbish, junk, vehicle parts, wood, metal, recycling materials, household items, building materials, rubble, and/or tires from the property, boulevard, driveway, alley, and yard.

- **Brief Description of Violation** – Exterior storage of rubbish

Photo # 14) Violation, SPLC 34.08 - Exterior Sanitation. All exterior property areas to be maintained in a clean, safe, and sanitary condition, free from accumulation of garbage, mixed municipal solid waste, animal feces or refuse. Immediately remove improperly stored or accumulated refuse including garbage, rubbish, junk, vehicle parts, wood, metal, recycling materials, household items, building materials, rubble, and/or tires from the property, boulevard, driveway, alley, and yard.

- **Brief Description of Violation** – Exterior storage of rubbish

Photo # 15) License Condition Violation # 2. A drive lane shall be maintained open for thru vehicle access as shown on the site plan.

Violation, SPLC 34.08 - Exterior Sanitation. All exterior property areas to be maintained in a clean, safe, and sanitary condition, free from accumulation of garbage, mixed municipal solid waste, animal feces or refuse. Immediately remove improperly stored or accumulated refuse including garbage, rubbish, junk, vehicle parts, wood, metal, recycling materials, household items, building materials, rubble, and/or tires from the property, boulevard, driveway, alley, and yard.

- **Brief Description of Violation** – Exterior storage of rubbish and not parked according to approved site plan dated 2/3/2000

Photo # 16) License Condition Violation # 2. A drive lane shall be maintained open for thru vehicle access as shown on the site plan.

- **Brief Description of Violation** – Not parked according to approved site plan dated 2/3/2000

Photo # 17) License Condition Violation # 1. The number of vehicles on the lot for sale shall not exceed (20) twenty. There shall be (8) eight customer/employee parking spaces provided on the property. The arrangement of sales display area and off-street parking shall be as shown on site plan on file with DSI.

Violation, SPLC 34.08 - Exterior Sanitation. All exterior property areas to be maintained in a clean, safe, and sanitary condition, free from accumulation of garbage, mixed municipal solid waste, animal feces or refuse. Immediately remove improperly stored or accumulated refuse including garbage, rubbish, junk, vehicle parts, wood, metal, recycling materials, household items, building materials, rubble, and/or tires from the property, boulevard, driveway, alley, and yard.

- **Brief Description of Violation** – Exterior storage of rubbish and not parked according to approved site plan dated 2/3/2000

Photo # 18) Violation, SPLC 34.08 - Exterior Sanitation. All exterior property areas to be maintained in a clean, safe, and sanitary condition, free from accumulation of garbage, mixed municipal solid waste, animal feces or refuse. Immediately remove improperly stored or accumulated refuse including garbage, rubbish, junk, vehicle parts, wood, metal, recycling materials, household items, building materials, rubble, and/or tires from the property, boulevard, driveway, alley, and yard.

- **Brief Description of Violation** – Exterior storage of rubbish

Photo # 19) License Condition Violation # 2. A drive lane shall be maintained open for thru vehicle access as shown on the site plan.

- **Brief Description of Violation** – Not parked according to approved site plan dated 2/3/2000

Photo # 20) License Condition Violation # 4. All repair and servicing of vehicles shall be conducted inside the building and not on the exterior of the lot or on the public streets or boulevards.

- **Brief Description of Violation** – Vehicle repair in public right-of-way

Photo # 21) License Condition Violation # 1. The number of vehicles on the lot for sale shall not exceed (20) twenty. There shall be (8) eight customer/employee parking spaces provided on the property. The arrangement of sales display area and off-street parking shall be as shown on site plan on file with DSI.

- **Brief Description of Violation** – Not parked according to approved site plan dated 2/3/2000

Photo # 22) License Condition Violation # 4. All repair and servicing of vehicles shall be conducted inside the building and not on the exterior of the lot or on the public streets or boulevards.

- **Brief Description of Violation** – Vehicle repair in public right-of-way

Photo # 23) Brief Description – Transport truck parked in the middle of the road to unload a vehicle (Robert Street South)

Photo # 24) Brief Description – Transport truck parked in the middle of the road to unload a vehicle

Photo # 25) Brief Description – Vehicle getting unloaded from transport truck

Photo # 26) Brief Description – Vehicle getting unloaded from transport truck

Complaint Inspection on 11/14/2024, at 10:04 am

Photo # 1

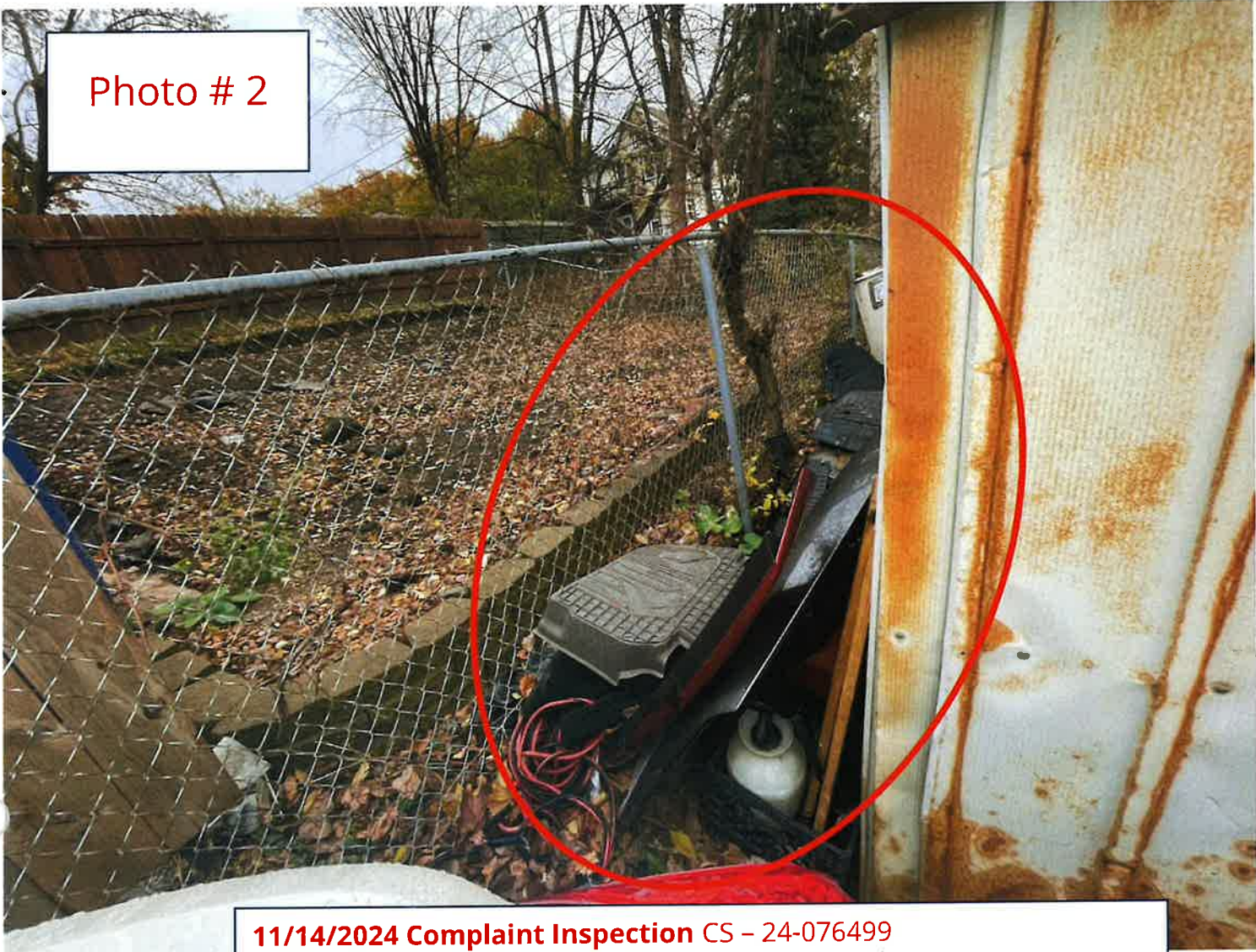


11/14/2024 Complaint Inspection CS - 24-076499

License Condition Violation # 5 & SPLC 34.08

Brief Description of Violation - Auto parts and rubbish stored out in the parking lot and around the sheds

Photo # 2

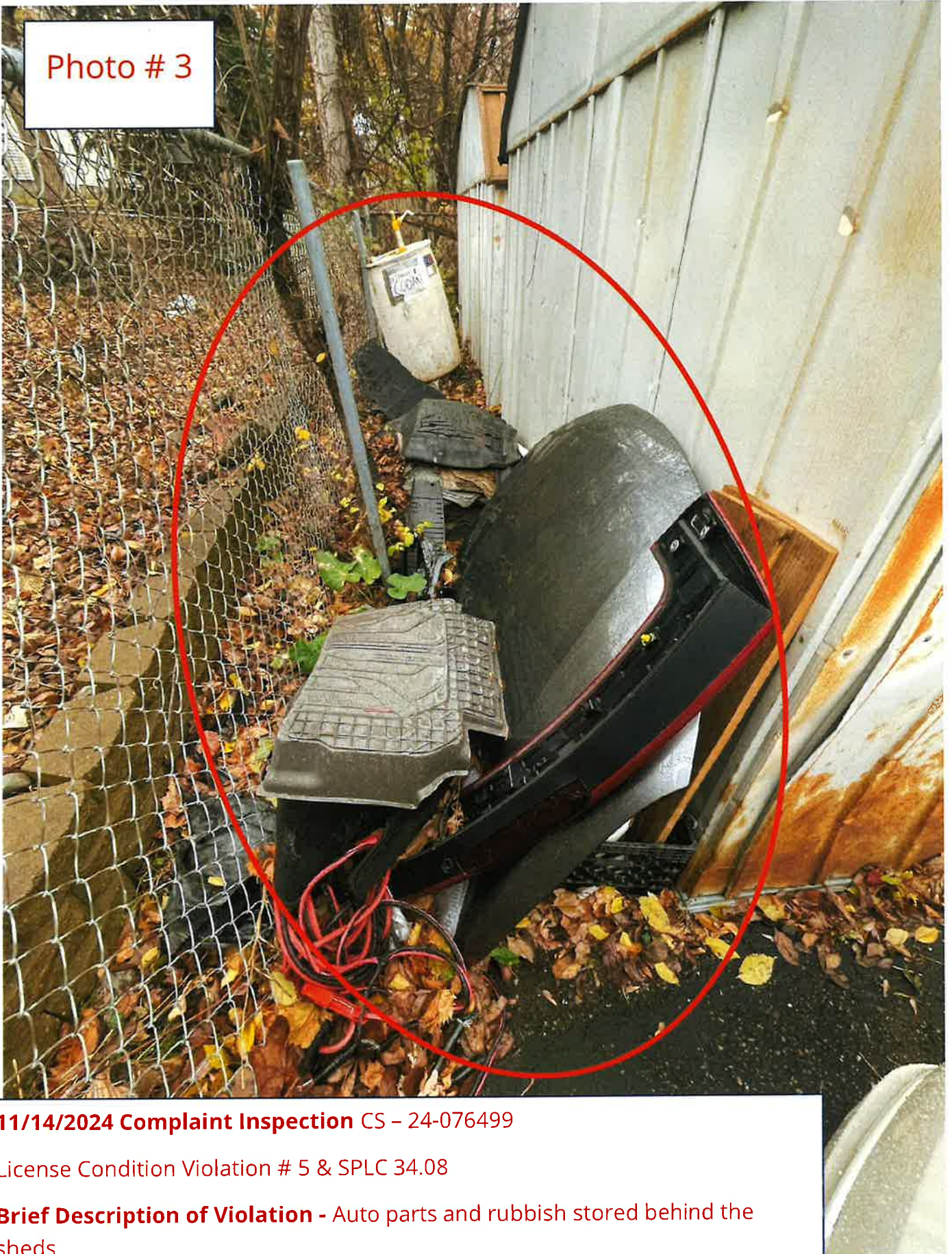


11/14/2024 Complaint Inspection CS - 24-076499

License Condition Violation # 5 & SPLC 34.08

Brief Description of Violation - Auto parts and rubbish stored behind the sheds

Photo # 3



11/14/2024 Complaint Inspection CS - 24-076499

License Condition Violation # 5 & SPLC 34.08

Brief Description of Violation - Auto parts and rubbish stored behind the sheds

Photo # 4



11/14/2024 Complaint Inspection CS - 24-076499

Violation of SPLC 34.08

Brief Description of Violation - Rubbish stored behind the sheds

Photo # 5



11/14/2024 Complaint Inspection CS – 24-076499

Violation of SPLC 34.08

Brief Description of Violation - Rubbish stored outside by the sheds

Photo # 6

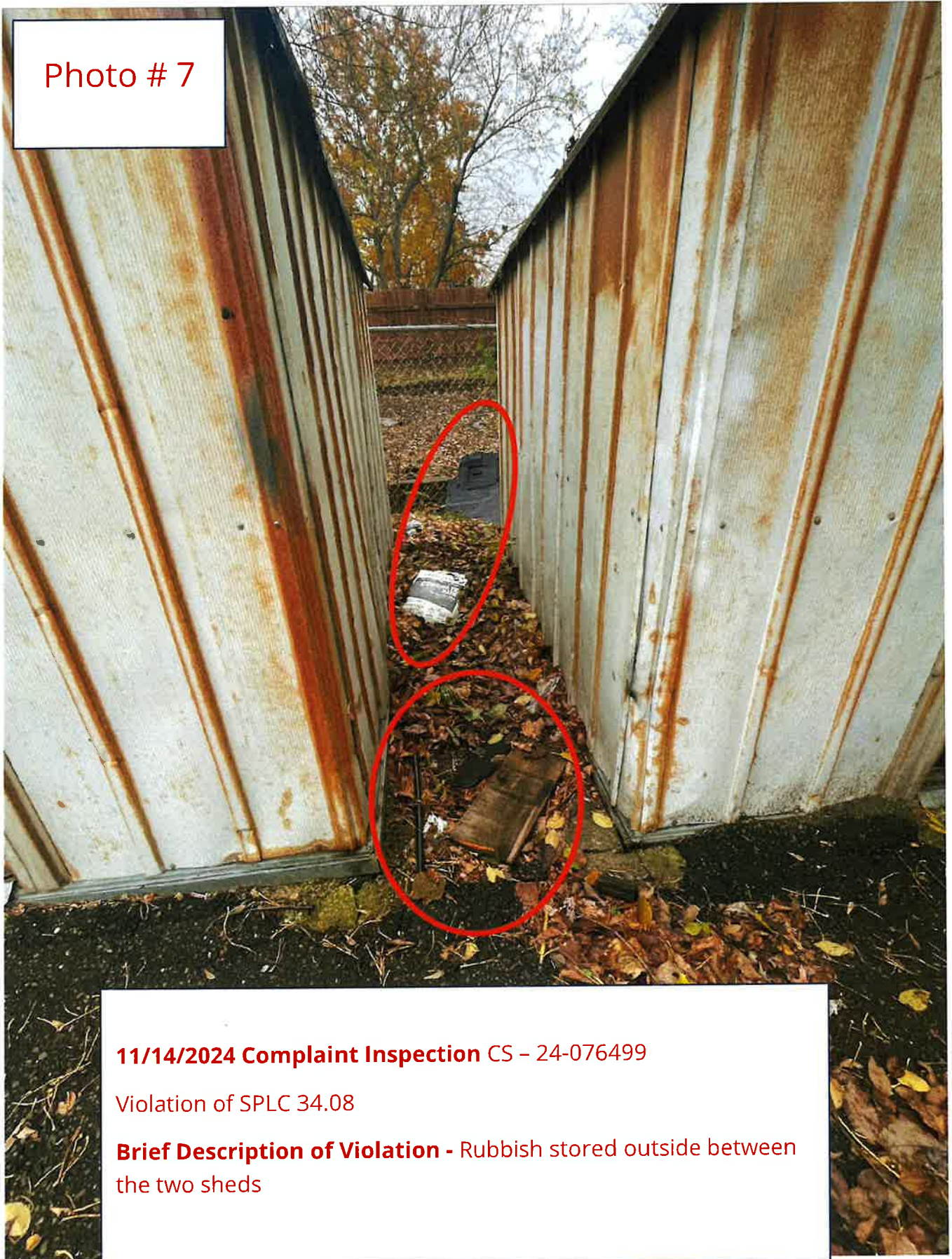


11/14/2024 Complaint Inspection CS - 24-076499

Violation of SPLC 34.08

Brief Description of Violation - Rubbish stored outside in a 5-gallon bucket that have concrete inside

Photo # 7



11/14/2024 Complaint Inspection CS - 24-076499

Violation of SPLC 34.08

Brief Description of Violation - Rubbish stored outside between the two sheds

Photo # 8

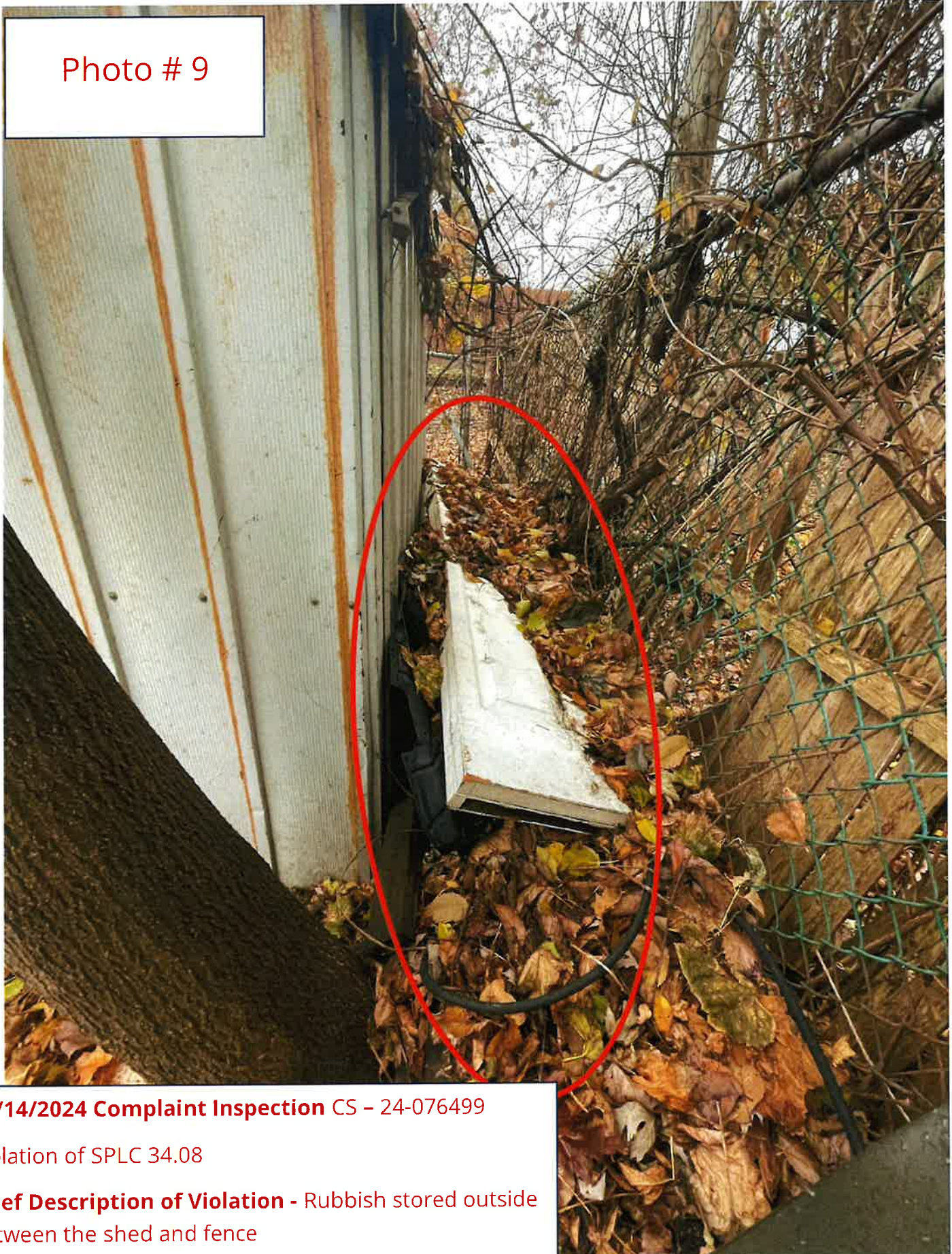


11/14/2024 Complaint Inspection CS - 24-076499

Violation of SPLC 34.08

Brief Description of Violation - Rubbish stored outside by the sheds

Photo # 9

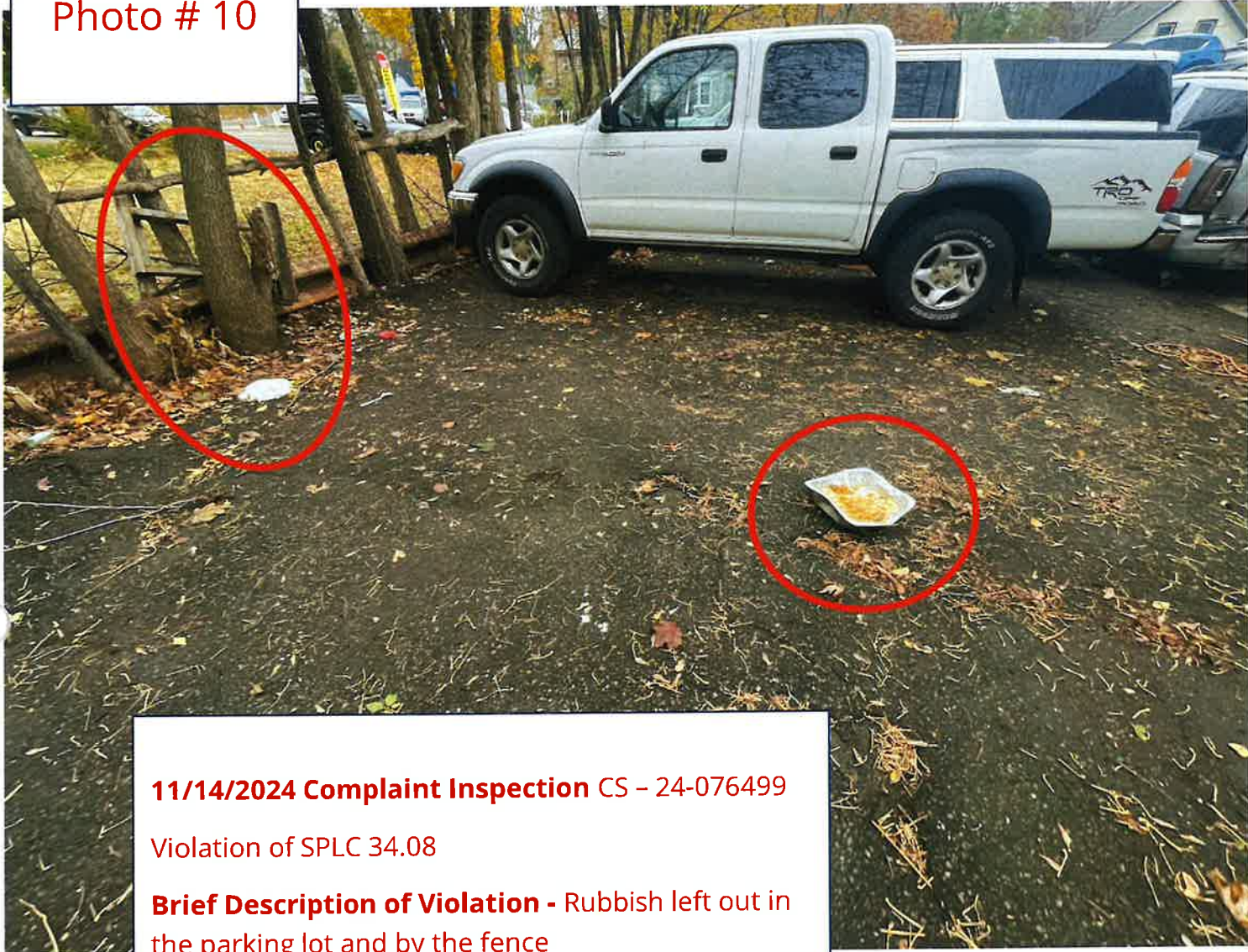


11/14/2024 Complaint Inspection CS - 24-076499

Violation of SPLC 34.08

Brief Description of Violation - Rubbish stored outside
between the shed and fence

Photo # 10



11/14/2024 Complaint Inspection CS - 24-076499

Violation of SPLC 34.08

Brief Description of Violation - Rubbish left out in the parking lot and by the fence

Photo # 11



11/14/2024 Complaint Inspection CS - 24-076499

Violation of SPLC 34.08

Brief Description of Violation - Rubbish left out in the parking lot

Photo # 12



11/14/2024 Complaint Inspection CS – 24-076499

Violation of SPLC 34.08

Brief Description of Violation - Rubbish left out in the parking lot

Photo # 13

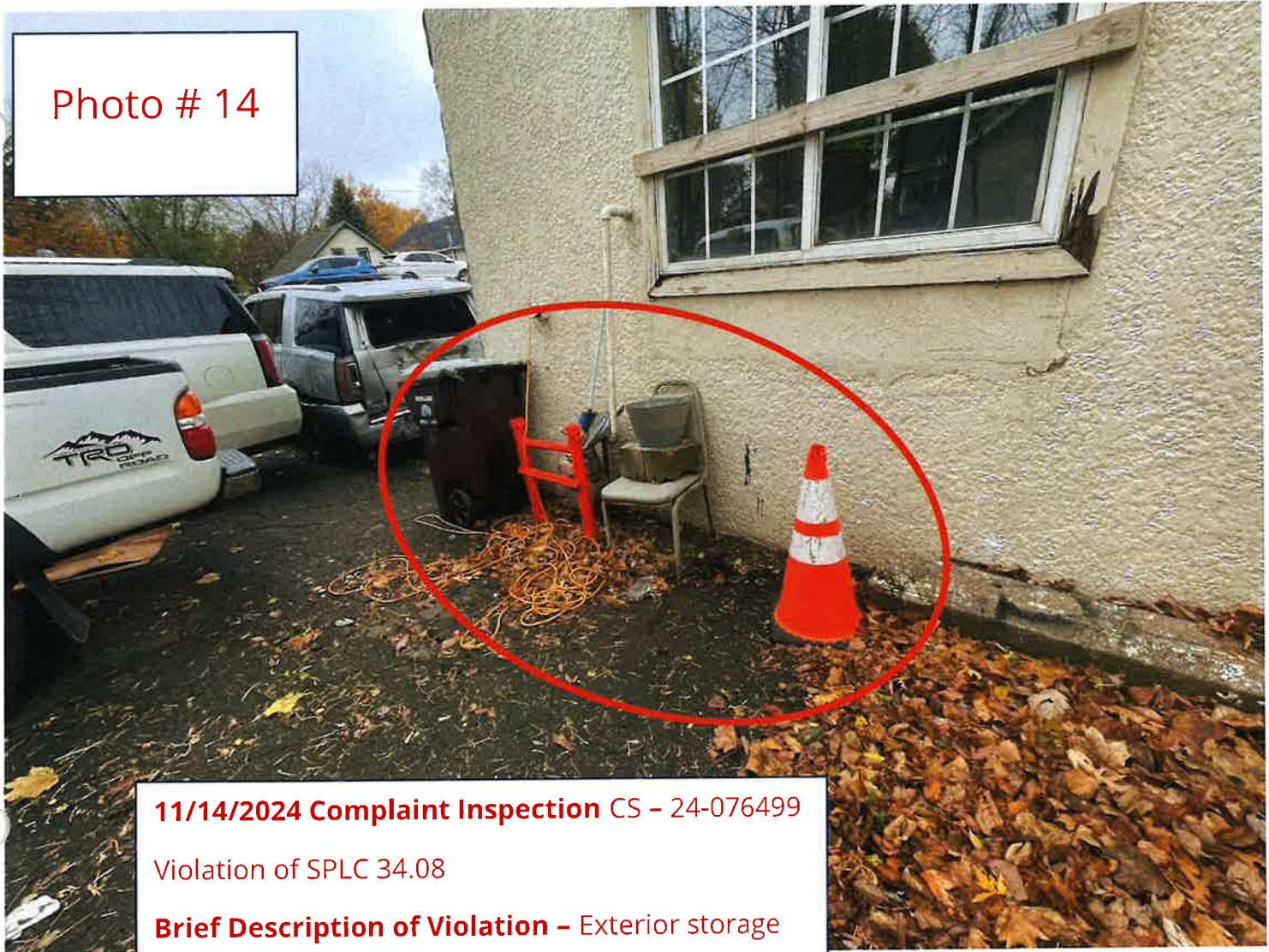


11/14/2024 Complaint Inspection CS - 24-076499

Violation of SPLC 34.08

Brief Description of Violation - Exterior storage of rubbish

Photo # 14



11/14/2024 Complaint Inspection CS - 24-076499

Violation of SPLC 34.08

Brief Description of Violation – Exterior storage
of rubbish

Photo # 15



11/14/2024 Complaint Inspection CS - 24-076499

License Condition Violation # 2 and SPLC 34.08

Brief Description of Violation - Exterior storage of rubbish and not parked according to approved site plan dated 2/3/2000

Photo # 16

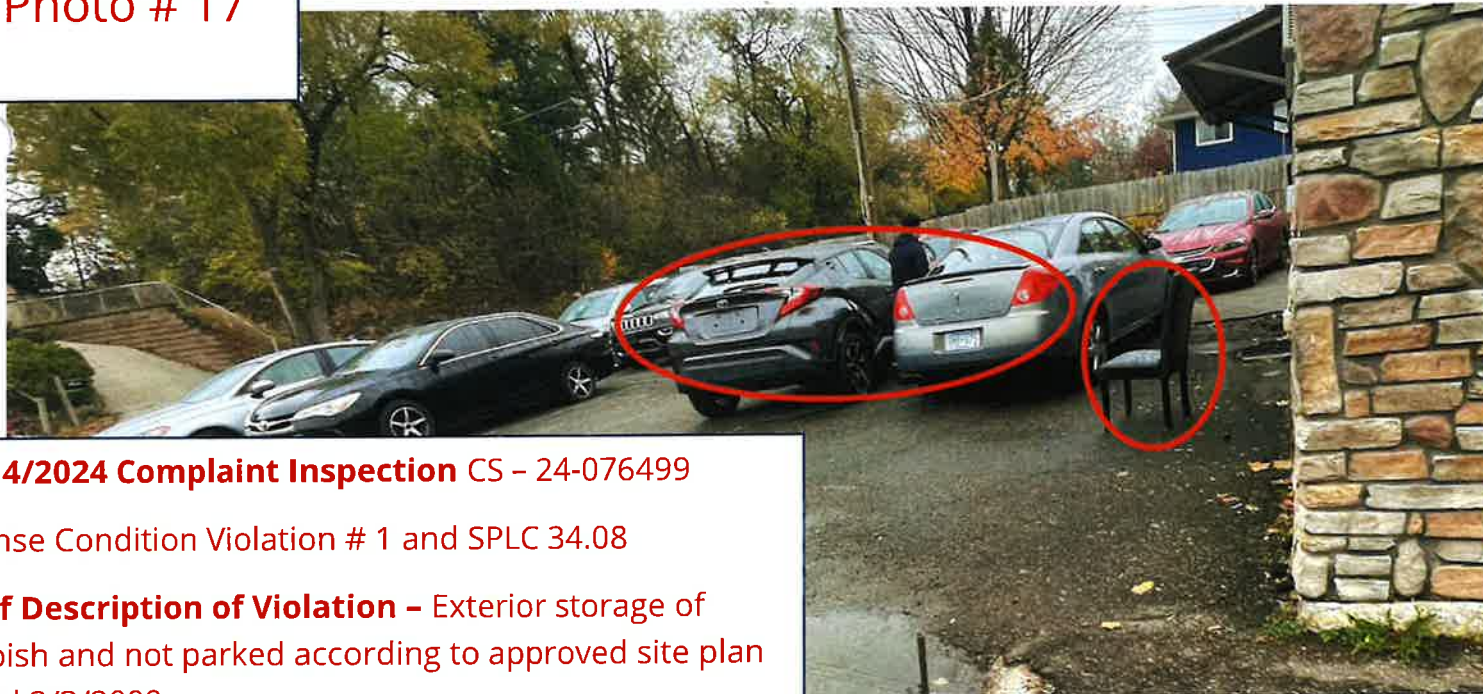


11/14/2024 Complaint Inspection CS – 24-076499

License Condition Violation # 2

Brief Description of Violation – Not parked according to approved site plan dated 2/3/2000

Photo # 17



11/14/2024 Complaint Inspection CS - 24-076499

cense Condition Violation # 1 and SPLC 34.08

Brief Description of Violation - Exterior storage of
rubbish and not parked according to approved site plan
dated 2/3/2000

Photo # 18



11/14/2024 Complaint Inspection CS - 24-076499

Violation of SPLC 34.08

Brief Description of Violation - Exterior storage of
rubbish

Photo # 19

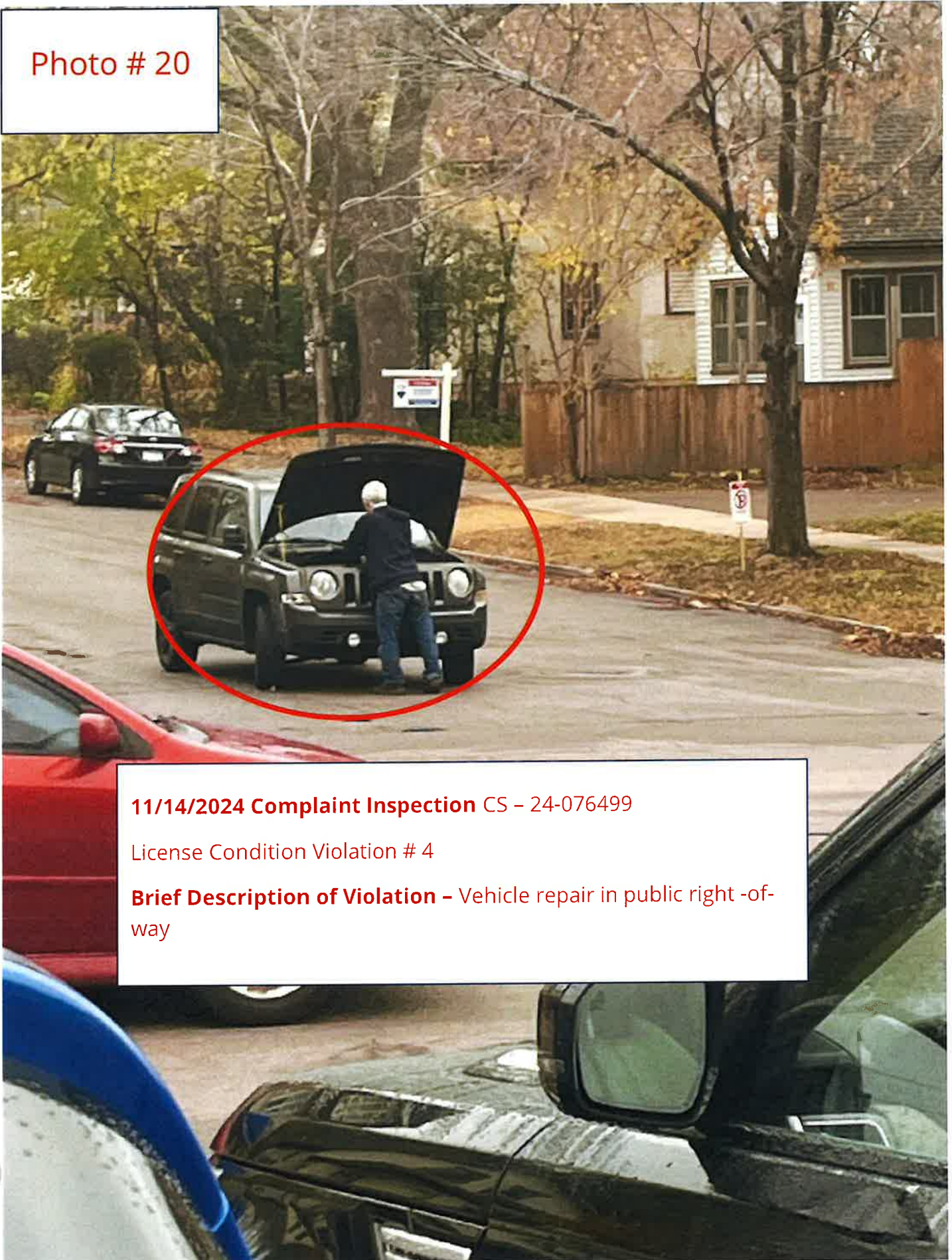


11/14/2024 Complaint Inspection CS - 24-076499

License Condition Violation # 2

Brief Description of Violation - Not parked according to approved site plan dated 2/3/2000

Photo # 20

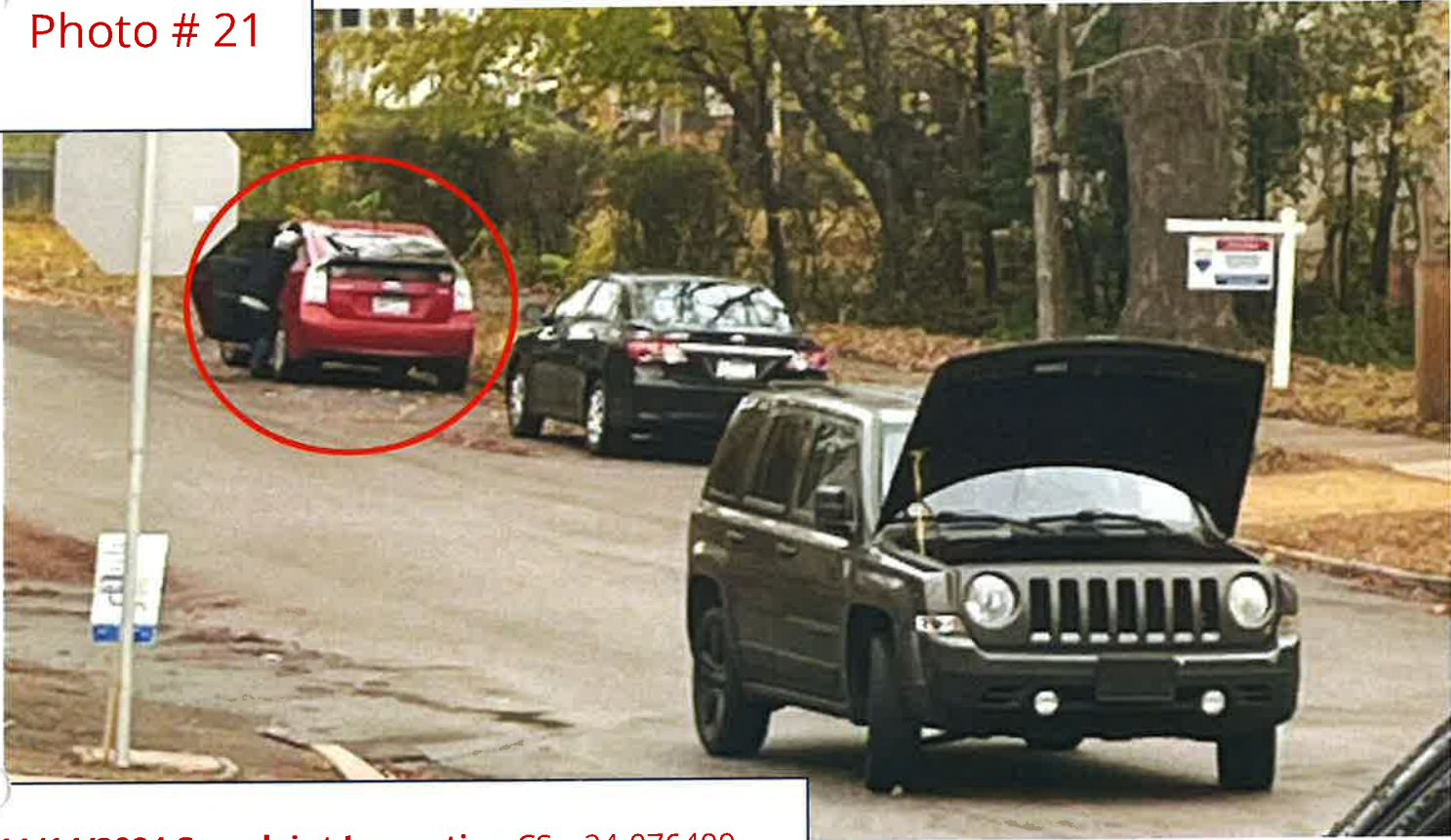


11/14/2024 Complaint Inspection CS - 24-076499

License Condition Violation # 4

Brief Description of Violation - Vehicle repair in public right-of-way

Photo # 21



11/14/2024 Complaint Inspection CS - 24-076499

License Condition Violation # 1

Brief Description of Violation - Not parked
according to approved site plan dated 2/3/2000

Photo # 22



11/14/2024 Complaint Inspection CS - 24-076499

License Condition Violation # 4

Brief Description of Violation - Vehicle repair in public right-of-way

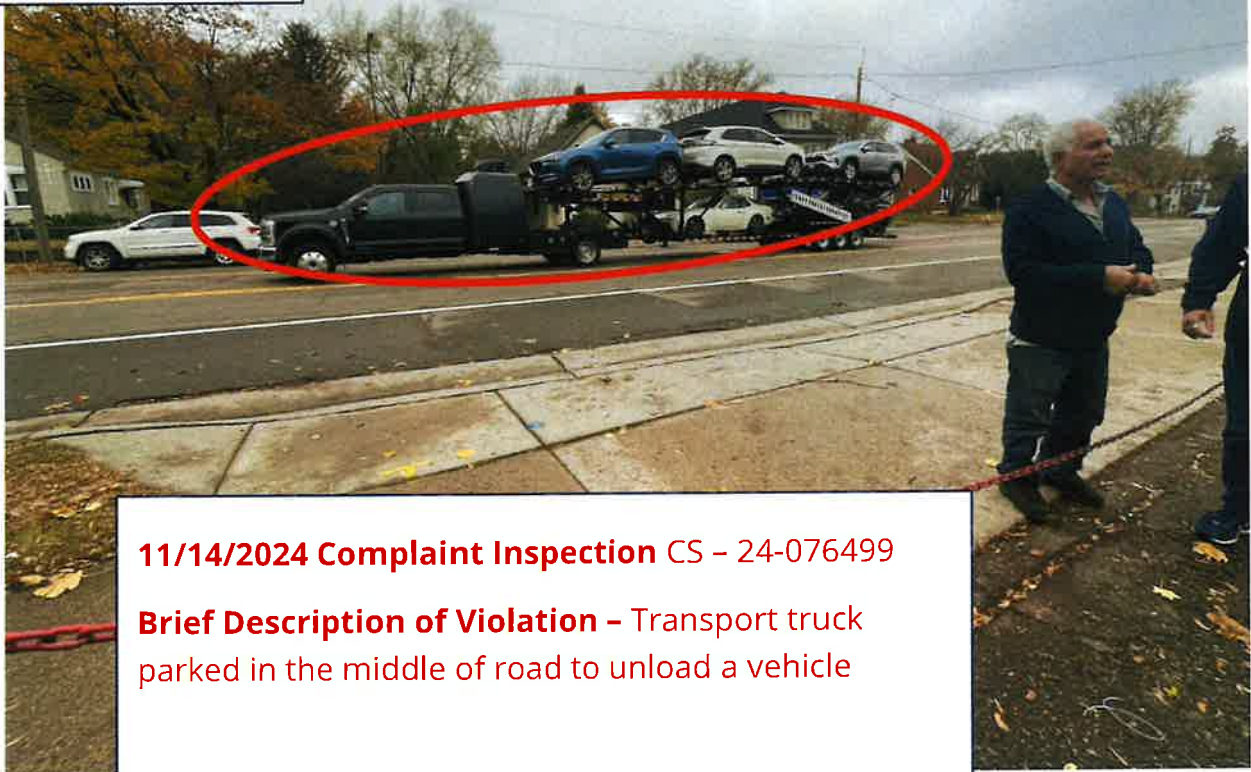
Photo # 23



11/14/2024 Complaint Inspection CS - 24-076499

Brief Description of Violation - Transport truck parked in the middle of road to unload a vehicle

Photo # 24



11/14/2024 Complaint Inspection CS - 24-076499

Brief Description of Violation - Transport truck parked in the middle of road to unload a vehicle

Photo # 25



11/14/2024 Complaint Inspection CS - 24-076499

Brief Description of Violation - Vehicle getting unloaded from transport truck

Photo # 26



11/14/2024 Complaint Inspection CS - 24-076499

Brief Description of Violation - Vehicle getting
unloaded from transport truck

830 South Robert Street – DBA: M F K Enterprise
Description of Map of Violation Observations – 11/14/2024 at 10:04am

NOTE: See attached map to coincide with numbers given below.

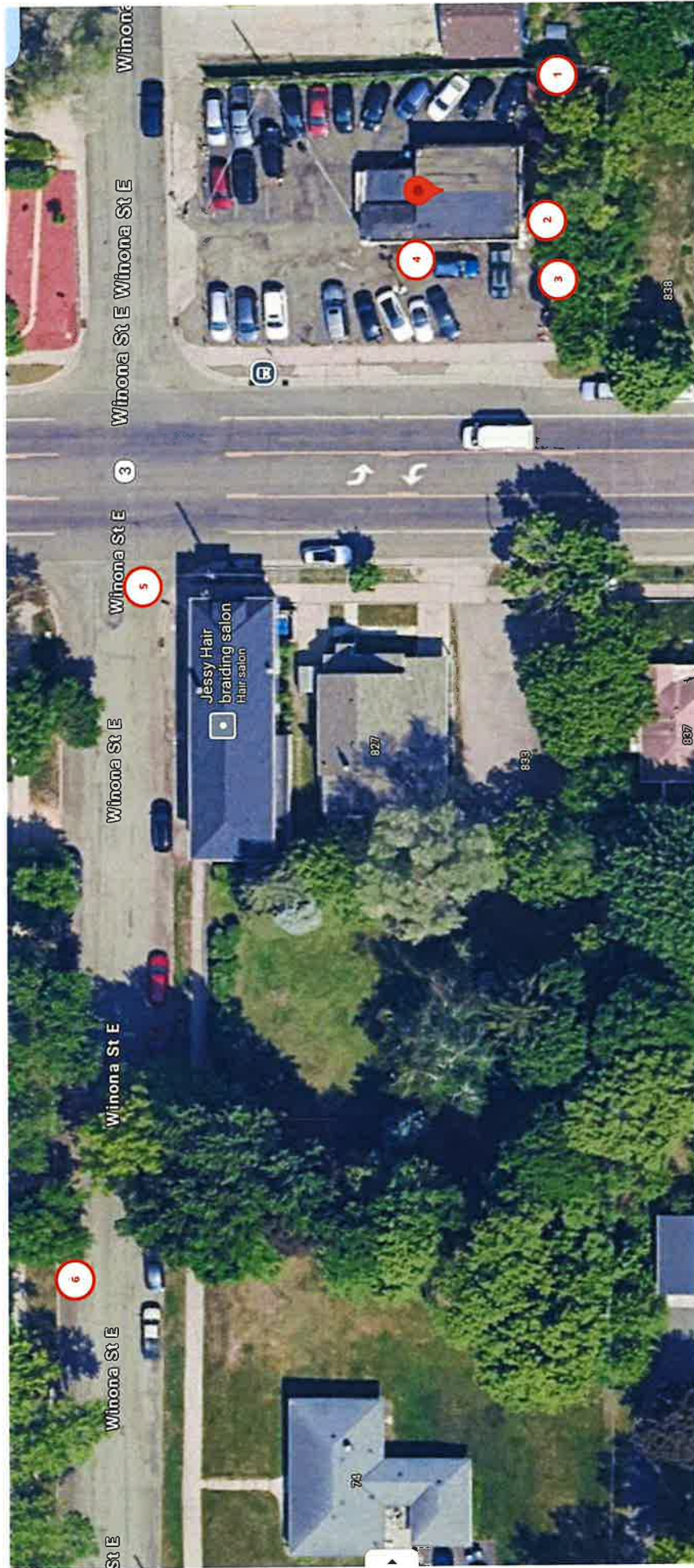
- 1) Outdoor storage located behind, between and around the two sheds including anti-freeze 55-gallon drum - **Vehicle parts and garbage – License Condition violation #5, #6 and SPLC 34.08**
- 2) Outdoor storage – Garbage and yard equipment (spreader with garden hose located between the fence of the property and the side of building and into the front of the property parking lot. - **SPLC 34.08 outdoor storage.**
- 3) Vehicle parked not in accordance with the approved site plan – **License condition #1 & #2**
- 4) Vehicle parked not in accordance with the approved site plan – **License condition #1 & #2**
- 5) Vehicle repair and servicing of vehicles in the public right of way, not within the building – **License condition violation #4**
- 6) Employee parking in the public right away not in accordance with the approved site plan – **License condition #1**

Joseph Voyda
Licensing inspector III



9/23/2025

830 South Robert Street - DBA: M F K Enterprise
Map of Violation Observations - 11/14/2024 at 10:04am



Proposed License Conditions

Add License conditions and Amending condition Language

Remove Strikethrough Language and Add Language in Red

Amended License conditions Language on Page 3

Proposed License Conditions:

4. The delivery or towed or trailered vehicles shall take place entirely within the approved site plan and cannot take place in the public right-of-way (e.g., street, alley, sidewalk, boulevard, etc.).
6. No customer vehicles under the control of the licensee can be parked and or stored in the public right- of-way (e.g., street, alley, sidewalk, boulevard, etc.) This includes vehicles waiting for repairs and vehicles waiting to be picked up by the customer.
8. There shall be no exterior storage of vehicle parts, tires, oil or any other materials. Storage of vehicle fluids, batteries, etc. shall be in accordance with the Ramsey County Hazardous Waste regulations.

Current License Conditions:

07/12/2000 CF00-653

1. The number of vehicles on the lot for sale shall not exceed (20) twenty. There shall be (8) eight customer/employee parking spaces provided on the property. The arrangement of sales display area and off-street parking shall be as shown on site plan on file with DSI.
2. A drive lane shall be maintained open for thru vehicle access as shown on the site plan.
3. Vehicles shall not project into or be parked on public streets or boulevards. The post and chain barrier restraint device must be maintained along the property line on Winona to prevent encroachment into the public area.
4. All repair and servicing of vehicles shall be conducted inside the building and not on the exterior of the lot or on the public streets or boulevards.
5. There shall be no exterior storage of vehicle parts.
6. Storage of vehicle fluids batteries, etc. shall be in accordance with the Ramsey County Hazardous Waste Regulations.
7. The dumpster must be stored on the property in an area of the site which is not required for customer parking or maneuvering.
8. Licensee shall monitor noise of equipment required for servicing vehicles. Overhead doors shall be kept closed when using noise producing tools.
9. Customer/employee parking spaces shall be designated with painted lines on parking surface and with appropriate signage delineating these spaces for the intended use. Striping of parking to be completed by July 1, 2000.

13-1



Removal of Language for License Conditions and Added Proposed License Conditions:

07/12/2000 CF00-653

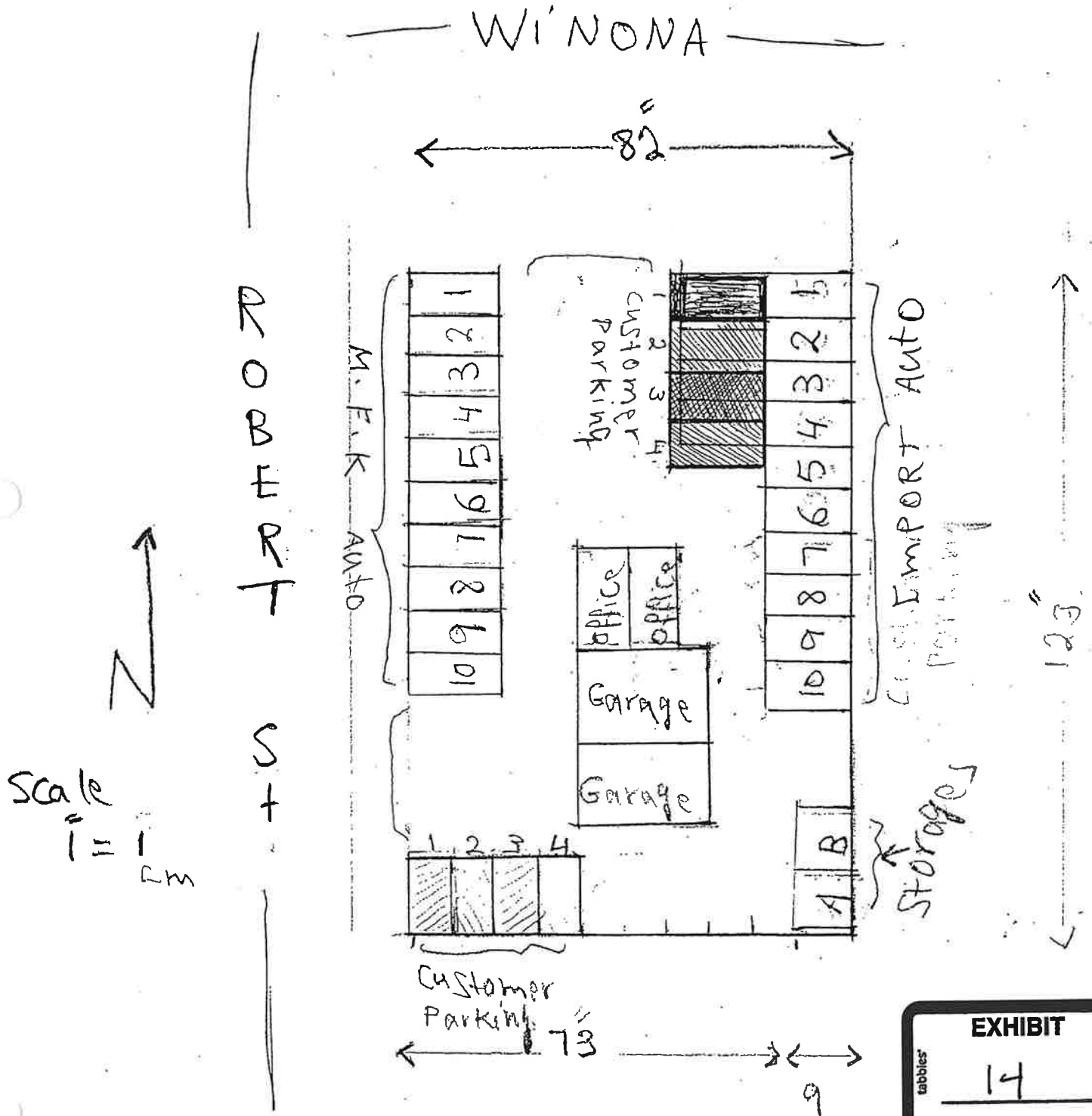
1. The number of vehicles on the lot for sale shall not exceed (20) twenty. There shall be (8) eight customer/employee parking spaces provided on the property. The arrangement of sales display area and off-street parking shall be as shown on site plan on file with DSI.
92. Customer/employee parking spaces shall be designated with painted lines on parking surface and with appropriate signage delineating these spaces for the intended use. Striping of parking spaces must be maintained. ~~to be completed by July 1, 2000.~~
23. A drive lane shall be maintained open for thru vehicle access as shown on the site plan.
4. The delivery or towed or trailered vehicles shall take place entirely within the approved site plan and cannot take place in the public right-of-way (e.g., street, alley, sidewalk, boulevard, etc.).
35. ~~Vehicles shall not project into or be parked on public streets or boulevards.~~ The post and chain barrier restraint device must be maintained along the property line on Winona to prevent encroachment into the public area.
6. No customer vehicles under the control of the licensee can be parked and or stored in the public right-of-way (e.g., street, alley, sidewalk, boulevard, etc.) This includes vehicles waiting for repairs and vehicles waiting to be picked up by the customer.
- 4-7. All repair and servicing of vehicles shall be conducted inside the building and not on the exterior of the lot or ~~in~~ the public streets, alley, sidewalk, ~~or~~ boulevards etc.
- 5-8. There shall be no exterior storage of vehicle parts, tires, oil or any other materials. Storage of vehicle fluids, batteries, etc. shall be in accordance with the Ramsey County Hazardous Waste regulations.
6. ~~Storage of vehicle fluids batteries, etc. shall be in accordance with the Ramsey County Hazardous Waste Regulations.~~
- 7 9. The dumpster must be stored on the property in an area of the site which is not required for customer parking or maneuvering.
810. Licensee shall monitor noise of equipment required for servicing vehicles. Overhead doors shall be kept closed when using noise producing tools.

Amended/Proposed License Conditions:

1. The number of vehicles on the lot for sale shall not exceed (20) twenty. There shall be (8) eight customer/employee parking spaces provided on the property. The arrangement of sales display area and off-street parking shall be as shown on site plan on file with DSI.
2. Customer/employee parking spaces shall be designated with painted lines on parking surface and with appropriate signage delineating these spaces for the intended use. Striping of parking spaces must be maintained.
3. A drive lane shall be maintained open for thru vehicle access as shown on the site plan.
4. The delivery or towed or trailered vehicles shall take place entirely within the approved site plan and cannot take place in the public right-of-way (e.g., street, alley, sidewalk, boulevard, etc.).
5. The post and chain barrier restraint device must be maintained along the property line on Winona to prevent encroachment into the public area.
6. No customer vehicles under the control of the licensee can be parked and or stored in the public right- of-way (e.g., street, alley, sidewalk, boulevard, etc.) This includes vehicles waiting for repairs and vehicles waiting to be picked up by the customer.
7. All repair and servicing of vehicles shall be conducted inside the building and not on the exterior of the lot or in the public streets, alley, sidewalk, boulevards etc.
8. There shall be no exterior storage of vehicle parts, tires, oil or any other materials. Storage of vehicle fluids, batteries, etc. shall be in accordance with the Ramsey County Hazardous Waste regulations.
9. The dumpster must be stored on the property in an area of the site which is not required for customer parking or maneuvering.
10. Licensee shall monitor noise of equipment required for servicing vehicles. Overhead doors shall be kept closed when using noise producing tools.

11

830 Robert St S



2/3/00 LJO

EXHIBIT
14

From: [Moe Kia](#)
To: [Allan Vang](#); [Riddhi Mistry](#)
Cc: [Sly Onyia](#); mfk.auto.enterprises@gmail.com
Subject: Re: MFK Enterprises Response Letter to Inspector's Report Dated 10/3/2024
Date: Wednesday, February 26, 2025 5:16:06 PM
Attachments: [image001.png](#)

You don't often get email from moekia09@yahoo.com. [Learn why this is important](#)

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

Dears,

With Regards to your previous violation letter dated 2/10/25, as per my communication by email which is a part of this thread, we chose option #3 so we get a chance to appear in front of the city council to tell our side of the story. Please let us know when this can be possible.

Kind Regards,
Moe Kia
MFK Enterprises
612.231.3222

On Wednesday, February 5, 2025 at 12:31:52 PM CST, Riddhi Mistry <riddhi.mistry@ci.stpaul.mn.us> wrote:

Hi Moe,

My apologies on not sending this email sooner, but I do appreciate you responding to us in a timely manner.

We are working on sending you an Amended Notice of Violation as we needed to make some changes to the initial Notice that we sent to you. I did not get a chance to reach out to you to let you know to disregard the Notice that you already received. I was off on bereavement for a week and trying to get caught up with work on my end.

Please let us know if you have any questions.

Sincerely,

Riddhi Mistry

Paralegal II, Civil Division

13-1

EXHIBIT

tabbles

15



SAINT PAUL
MINNESOTA

Pronouns: she/her/hers
Office of the City Attorney
15 W. Kellogg Blvd.

Saint Paul, MN 55102

P: 651-266-8835

Riddhi.mistry@ci.stpaul.mn.us

www.StPaul.gov | Follow us on [Facebook](#)

From: Moe Kia <moekia09@yahoo.com>

Sent: Tuesday, February 4, 2025 12:34 PM

To: Allan Vang <Allan.Vang@ci.stpaul.mn.us>

Cc: Riddhi Mistry <Riddhi.Mistry@ci.stpaul.mn.us>; Moe Kia <mfk.auto.enterprises@gmail.com>

Subject: MFK Enterprises Response Letter to Inspector's Report Dated 10/3/2024

You don't often get email from moekia09@yahoo.com. [Learn why this is important](#)

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

Dears,

Please find response letter attached and let me know if there are any questions.

Kind Regards,

Moe Kia

MFK Enterprises

612.231.3222

February 4, 2025

Dear Mr. Vang

In response to your inspection report dated 10/3/24 I would like to mention some facts regarding this report.

1. As you are aware, we are 2 different used car dealerships with 2 different licenses with the city and state, while sharing the same location for more than 20 years. All these years, we have tried our best to keep the place of business free of any flaws in order to comply with city ordinances. Unfortunately, due to unforeseen circumstances, from time to time things may come up that with the friendly recommendation from the city inspector we have corrected the issue as soon as possible.
2. Regarding your inspection dated 10.3.24 I should bring up that the inspection happened in early morning when the business was still closed. Our hours are from 10 am to 6 pm as posted on the front door, so we were not here to properly address the inspector Vang's concerns. There was a handicapped, mentally challenged individual who happened to be here at the time, who has no association with MFK, since I have no employees as a small business with only 10 cars. I don't know why and how he introduced himself as an MFK employee, but you can verify that by information about the car that he was unloading from the transport truck to find out about the truth. After all these years we have always been respectful to inspectors and city employees and we have never made a harsh comment like "nothing you can do, take all the pictures you want" or that "this is a public road so they could parked any vehicles there if they choose to do so and there is nothing I could do about it" as quoted from your inspection report. That's because we are aware of the conditions on our license and we know better and always be respectful to all city inspectors.
3. On the report, most of the cars are not ours and have nothing to do with MFK Enterprises.
4. My home address is 6566 France Ave S. Apt 605 Minneapolis, MN 55434. So hopefully any correspondence can be sent to this address or the business address at 830 S. Robert st, St. Paul, MN 55107.
5. As you are aware, there is a huge road project for Robert street starting next year and they told us the project will take 2 years for completion and will have a significant impact on our business. We are also just recovering from nearly 2 years from Covid and with this new project we will have more challenges ahead. Therefore, respectfully we plan to go with option #3 which we would like to schedule this matter before city council hearing to contest the \$1,000 matrix penalty.

Thank you and I look forward to your prompt response.

Sincerely yours,
Moe Kia
MFK Enterprises
612.231.3222



SAINT PAUL
CITY ATTORNEY

OFFICE OF THE CITY ATTORNEY
LYNDSEY M. OLSON, CITY ATTORNEY

Civil Division, 15 Kellogg Blvd. West, 400 City Hall
Saint Paul, MN 55102
Tel: 651-266-8571 | Fax: 651-298-5619

May 13, 2025

NOTICE OF COUNCIL HEARING

M F K Enterprise Inc
d/b/a M F K Enterprise
830 Robert Street South
Saint Paul, MN 55107
Attn: Moe Faryaneh Kia

RE: Auto Repair Garage & Second Hand Dealer-Motor Vehicle license held by M F K Enterprise Inc
d/b/a M F K Enterprise at the premises located at 830 Robert Street South in Saint Paul
(License ID #: 57957)

Dear Mr. Kia:

Please take notice that this matter has been set on the Council Hearing Agenda for a City Council meeting on Wednesday, May 28, at 3:30 p.m. in the City Council Chambers, Third Floor, Saint Paul City Hall and Ramsey County Courthouse, 15 West Kellogg Boulevard, Saint Paul, MN 55102.

We received an email from you on February 27, 2025, indicating that you were not contesting the facts related to the incident, but was requesting an opportunity to address the Council regarding the penalty, the resolution and supporting documents.

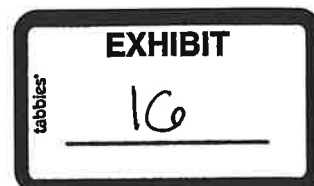
This is an uncontested license matter related to a complaint-based inspection conducted at the premises by the Department of Safety and Inspections. During that inspection a DSI Inspector observed vehicles parked in the public right-of-way, on the side of the road, and surrounding areas that are in violation of the business's license conditions. The complaint-based inspection was followed by a second inspection where DSI Inspector's also observed rubbish, food scraps, motor oil and chairs around the exterior of the business. A vehicle was parked in the middle of the road, on the public road and surrounding areas. These observations prove that the property has an impact of the neighboring surrounding areas safety.

The licensing office will recommend a \$1,000.00 matrix penalty.

CITY OF SAINT PAUL
MELVIN CARTER, MAYOR

STPAUL.GOV

16-1





SAINT PAUL
CITY ATTORNEY

OFFICE OF THE CITY ATTORNEY
LYNDESEY M. OLSON, CITY ATTORNEY

Civil Division, 15 Kellogg Blvd. West, 400 City Hall
Saint Paul, MN 55102
Tel: 651-266-8571 | Fax: 651-298-5619

Sincerely,

/s/

Sly Onyia

Assistant City Attorney

License No. 0402320

Cc: Moe Faryaneh Kia, 9133 Utica Avenue South, Bloomington, MN 55437
Mohammad Bhager Abedi & Mostafa Kia, 830 Robert Street South, Saint Paul, MN 55107-3232
Dan Conlan, 137 Winona Street East, Saint Paul, MN 55107
Monica Bravo, Executive Director, West Side Community Organization, 209 Page Street West, Saint Paul, MN 55107.

Enclosure: Council Hearing Packet

- Affidavit of Notice of Council Hearing 05/13/2025
- Resolution - 05/28/2025
- Notice of Violation for Imposition of \$1000.00 matrix penalty - 02/10/2025
- City of Saint Paul Department of Safety and Inspections Complaint - 5/3/2024
- Correction Notice - 7/1/2024
- Mailing Envelope to Licensee - 7/8/2024
- Inspector's Report - 10/3/2024
- Inspector's Report - 11/14/2024
- City of Saint Paul Department of Safety and Inspections Complaint - 11/20/2024
- License Group Conditions Text - 11/21/2024
- Property Diagram
- Proposed License Conditions
- Removal of Language for License Conditions and Added Proposed License Conditions
- Amended Proposed License Conditions
- Ordinance Basis for Imposition of License Conditions and Reasoning Explanations
- Photo Evidence
- Saint Paul Legislative Code §310.01
- Saint Paul Legislative Code §310.04(b)(5)
- Saint Paul Legislative Code §310.04(b)(6)(a)
- Saint Paul Legislative Code §310.04(b)(6)(c)

CITY OF SAINT PAUL
MELVIN CARTER, MAYOR

STPAUL.GOV



SAINT PAUL
CITY ATTORNEY

OFFICE OF THE CITY ATTORNEY
LYNDSEY M. OLSON, CITY ATTORNEY

Civil Division, 15 Kellogg Blvd. West, 400 City Hall
Saint Paul, MN 55102
Tel: 651-266-8571 | Fax: 651-298-5619

- Saint Paul Legislative Code §310.04(b)(7)
- Saint Paul Legislative Code §310.04(b)(8)
- Saint Paul Legislative Code §310.04(c)(1)
- Saint Paul Legislative Code §310.04(c)(2)
- Saint Paul Legislative Code §310.04(c)(3)
- Saint Paul Legislative Code §310.04(c)(4)
- Saint Paul Legislative Code §310.04(c)(6)
- *Saint Paul Legislative Code §65.705*



City of Saint Paul

Signature Copy

Resolution: RES 25-789

City Hall and Court
House
15 West Kellogg
Boulevard
Phone: 651-266-8560

File Number: RES 25-789

Approving adverse action against the Auto Garage & Second Hand Dealer - Motor Vehicle license held by M F K Enterprise Inc d/b/a M F K Enterprise, (License ID #57957) for the premises located at 830 Robert Street South. (Licensee will speak to Council on his own behalf) (Amend to add imposition of license conditions).

WHEREAS, the Auto Garage & Second Hand Dealer - Motor Vehicle license ("License") held by M F K Enterprise Inc d/b/a M F K Enterprise (License ID # 57957) at 830 Robert Street South ("Licensed Premises") was the subject of a Notice of Violation and Request for Imposition of \$1,000.00 matrix penalty, herein incorporated as **Exhibit #1** ("Notice") sent on February 10, 2025; and

WHEREAS, the title of the Notice should have included language related to the recommendation of the Department of Safety and Inspections to impose of amended/revised license conditions; and

WHEREAS, the Notice alleged on July 1, 2024, DSI Inspector Allan Vang sent a correction notice to the licensee indicating there were violations discovered from a May 3, 2024, inspection that required rectification by July 12, 2024, which shortly thereafter a re-inspection would take place; and

WHEREAS, the Notice alleged the July 1, 2024, correction notice described that the failure to correct violations (license conditions 1, 2, 4, and 5) prior to re-inspection, may result in adverse action against all licenses issued at the location up to and including a revocation of license; and

WHEREAS, the Notice alleged, that during a complaint-based inspection on October 4, 2024, DSI Inspector, Allan Vang observed vehicles parked in the public right-of-way, on the side of the road, and surrounding areas that were ~~are~~ in violation of the businesses' license conditions; and

WHEREAS, the Notice alleged, that during another inspection on November 14, 2024, DSI Inspector, Allan Vang and Inspector, Joseph Voyda observed a vehicle parked in the middle of the road. Vehicles were also parked on the public road and surrounding area. DSI Inspectors also observed rubbish, food scraps, motor oil and chairs around the exterior of the business; and

WHEREAS, the ~~complaint inspections~~ inspector's observations of violations prove that the property has an impact of to the neighboring surrounding areas safety; and and conditions updating. It also ~~observed outdated license conditions to implement current language for on street parking, outdoor storage and delivery of vehicles to the licensed premises. A removal of language and conditions that will no longer apply, thus, resulting in an imposition of amended/proposed license conditions 1,2, and 3.~~

WHEREAS, the Notice gave the licensee until February 20, 2025, to 1.) do nothing and a resolution would be submitted to Council to impose the \$1000.00 matrix penalty; 2.) pay the \$1,000.00 matrix penalty; 3.) admit the facts and request a hearing before the City Council; and 4.) request an administrative hearing;

WHEREAS, on February 26, 2025, the City Attorney's Office received an email from the licensee

admitting to the facts, but contesting the \$1,000.00 matrix penalty and requesting a hearing before City Council (Exhibit #2); and

WHEREAS, after February 27, 2025, the City Attorney's Office has made multiple follow up attempts to communicate with licensee on how to resolve the penalty. However, licensee failed to respond to any communication from the City Attorney's Office;

WHEREAS, the City Attorney's Office was able to speak with the licensee on May 28, 2025, and understands that the Licensee had read the Notice and reviewed the amended/revised conditions and wishes to go forward with the hearing before Council; and

WHEREAS, because of the written request of the Licensee admitting the facts and requesting an opportunity to address the penalty before City Council, the City Attorney's Office is placing this matter on the Council agenda;

WHEREAS, the Licensee appeared and address Council on this matter; and

WHEREAS, during the Licensee's testimony and after they concluded their testimony, the Council President expressed concerns that the Licensee was contesting the facts; now therefore, and

Whereas, the Council President stated that the Uniform Rules of License Procedure require a hearing before and Administrative Law Judge when facts are contested; and

WHERAS, the Council President then made a motion to refer this matter to an Administrative Law Judge for a hearing and to receive recommendations on the facts as alleged by the Department of Safety and Inspections; now therefore be it

~~RESOLVED, the Auto Garage & Second Hand Dealer - Motor Vehicle license held by M F K Enterprise Inc d/b/a M F K Enterprise, (License ID #57957), for the premises located at 830 Robert Street South, Saint Paul, MN 55107 is hereby to pay ordered to pay the \$1,000.00 matrix penalty; and~~

RESOLVED, that the matter is referred to a hearing before an Administrative Law Judge.

At a meeting of the City Council on 5/28/2025, this Resolution was Passed.

Yea: 7 Councilmember Noecker, Councilmember Yang, Councilmember Kim, Councilmember Bowie, Councilmember Jost, Councilmember Johnson, and Councilmember Privratsky

Nay: 0

Vote Attested by
Council Secretary


Shari Moore

Date 5/28/2025

Approved by the Mayor


Melvin Carter III

Date 6/4/2025

Christine Haas

From: Therese Skarda
Sent: Thursday, August 14, 2025 11:18 AM
To: Christine Haas
Subject: FW: FW: FW: MFK Auto 830 south robert street...

From: Riddhi Mistry <Riddhi.Mistry@ci.stpaul.mn.us>
Sent: Friday, July 11, 2025 9:12 AM
To: e conlan <scootertramp46@gmail.com>
Cc: Therese Skarda <therese.skarda@ci.stpaul.mn.us>
Subject: RE: FW: FW: MFK Auto 830 south robert street...

Good morning, Mr. Conlan,

Thank you for providing me with a written statement of your concerns regarding M F K Enterprise.

I have forwarded your email and written statement to our DSI attorney, Therese Skarda, for her reference.

As I truly understand your frustration and concerns, we really hope that we can come to a settlement on this matter.

Sincerely,



**SAINT PAUL
MINNESOTA**

Riddhi Mistry

Paralegal II, Civil Division

Pronouns: she/her/hers

Office of the City Attorney

15 W. Kellogg Blvd.

Saint Paul, MN 55102

P: 651-266-8835

Riddhi.mistry@ci.stpaul.mn.us

www.StPaul.gov | Follow us on [Facebook](#)

From: e conlan <scootertramp46@gmail.com>
Sent: Friday, July 11, 2025 7:55 AM
To: Riddhi Mistry <Riddhi.Mistry@ci.stpaul.mn.us>
Subject: Re: FW: FW: MFK Auto 830 south robert street...

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

For over 20 years, my neighbors and I have had our lives affected by the actions of business at 830 South Robert.

To better understand the problem, let me explain the logistics of this predicament. 830 south Robert is at the corner of east Winona and Robert. East Winona is a 1 block long, dead end street. That means everyone on our block must navigate past illegally parked cars (next to stop sign, within 5 feet of driveways, and cars being worked on), cars stopped in the middle of the roadway, and people having extended conversations in the middle of the road. We have no option to leave our homes, we must drive to Robert and Winona and navigate through this mess.

Once we manage to reach the intersection, our view of oncoming northbound and southbound traffic on Robert is blocked by illegally parked excess inventory from 830 south Robert. Cars are left parked on the street for days and weeks at a time. We must pull out almost into traffic to get a clear view of oncoming traffic. Take a close look at the pictures from the license inspectors of parked cars on Robert and you should see the parked cars and the line of boulevard trees effectively block any view of oncoming traffic. It is an extremely dangerous situation for us, especially with heavy traffic volumes on South Robert.

If you read the list of license violations noted by the inspectors, and the comments made by employees/owners at 830 south Robert, you get a feel for the blatant disregard the businesses have for restrictions, or for the neighborhood. It is not a new situation, and it has been ignored or treated lightly by the city for too long.

In the early 2000s, myself and 7 of my neighbors showed up at a Council meeting to oppose leniency for adverse action against 830 south Robert—we were told it wasn't the correct venue, and weren't allowed to voice our objections. The same neighbors appeared at a license hearing to expand licenses at 830 south Robert, and were told there was nothing they could do to reject the application. At the most recent Council meeting to address the adverse action, I was told I couldn't comment. When listening to the council proceedings, I learned that 2 previous adverse actions were "put aside" if no further actions occurred within 6 months (even though the same violations have occurred continually over the years).

These are just a few items to illustrate the point that the neighborhood isn't allowed to give input on actions involving 830 south Robert. Nobody seems to want to look at the problems of allowing multiple licenses on a parcel of land much too small to support that number of licenses—and the compound effect on the neighborhood when this location is the "choke point" for everyone on my block to leave or return to our homes.

My fear is that 830 south Robert will again be given leniency and the same conditions will continue as they have every time over the past 20 years or so. This is not a case of poor immigrants wanting to be a part of the neighborhood. It is not a case of a struggling business trying to succeed. It is a case of smart and shrewd businessmen who do a very good cash business and flout legal restrictions without hesitation. It is a case of multiple businesses who have outgrown the reasonable limits on the size of the parcel they operate from. It is a situation that presents an ongoing threat to the safety of neighbors living on the dead end street that this business affects every day. It is a situation where I suspect the businesses will anticipate another "slap on the wrist" or no action—as has happened numerous times in the past.

The last point I wish to make is something I heard at the latest Council meeting from Mr Kia (one of the owners). He said that the violations recorded by inspectors were from the other

business at 830. He said he couldn't be responsible for their actions. Saint Paul set up the opportunity for multiple businesses at this location, and Saint Paul set up the opportunity for each owner to point the finger at the other owner. It is time for Saint Paul to forcefully address the problem they created.

Some of the neighbors have indicated they would like to sign on this letter

Name

street address

Barb Munos 822 So. Robert St

Steve Munos 822 So. Robert St

~~Rich [unclear]~~ 115 E. Winona St,

Patricia Preston 115 E. Winona St,

John Hernandez 158 E Winona St

Mimi 126 Winona St E. St Paul MN

Peggy Davis 126 Winona Street

Shane Davis 126 Winona Street E St. Paul, MN 55107

Jiffany Monita 143 Winona St E. St. Paul Mn. 55107

Daniel Monita 143 Winona STE ST Paul MN 55107

Kelli Natta 143 Winona St E St Paul

Brianna McDonough 143 Winona St E St. Paul Mn 55107

Denise, Darrell James 135 Winona St =
St. Paul, MN 55107

Carmen and Paul Amaya 132 E Winona St
Saint Paul MN
55107

Liz & Michelle Steeber 136 Winona St E
55107

Cortney and Sheena Taylor 815 Robert + St. S. 55124
St. Paul MN

Emmi Vasquez 74 E Winona

Dollee Luna 74 E Winona St Paul,
MN 55107

Christine Haas

From: Therese Skarda
Sent: Thursday, August 14, 2025 11:18 AM
To: Christine Haas
Subject: FW: FW: FW: MFK Auto 830 south robert street...

From: Riddhi Mistry <Riddhi.Mistry@ci.stpaul.mn.us>
Sent: Friday, July 11, 2025 9:12 AM
To: e conlan <scootertramp46@gmail.com>
Cc: Therese Skarda <therese.skarda@ci.stpaul.mn.us>
Subject: RE: FW: FW: MFK Auto 830 south robert street...

Good morning, Mr. Conlan,

Thank you for providing me with a written statement of your concerns regarding M F K Enterprise.

I have forwarded your email and written statement to our DSI attorney, Therese Skarda, for her reference.

As I truly understand your frustration and concerns, we really hope that we can come to a settlement on this matter.

Sincerely,



**SAINT PAUL
MINNESOTA**

Riddhi Mistry

Paralegal II, Civil Division

Pronouns: she/her/hers

Office of the City Attorney

15 W. Kellogg Blvd.

Saint Paul, MN 55102

P: 651-266-8835

Riddhi.mistry@ci.stpaul.mn.us

www.StPaul.gov | Follow us on [Facebook](#)

From: e conlan <scootertramp46@gmail.com>
Sent: Friday, July 11, 2025 7:55 AM
To: Riddhi Mistry <Riddhi.Mistry@ci.stpaul.mn.us>
Subject: Re: FW: FW: MFK Auto 830 south robert street...

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EXHIBIT

tabbles

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Hello Ms Mistry

Thank you for updating me on the process with 830 south Robert street.

I get the feeling that the voice of neighbors will again not be heard when the city deals with 830 South Robert. For over 20 years these businesses have repeatedly ignored restrictions, and seem to skate by with "temporary" fines that are forgiven if nothing further occurs within 6 months. I feel the owners are smart people who know the city will probably fold, and forgive them in the long run--as has happened in the past. I appreciate the opportunity to express my opinion in written form, but am disappointed that this is another proceeding that apparently shuts out the neighborhood from personally addressing the process.

thank you

On Mon, Apr 21, 2025 at 9:29 AM Riddhi Mistry <Riddhi.Mistry@ci.stpaul.mn.us> wrote:

Hello Mr. Conlan,

Can you please provide me with your first and last name along with an appropriate address that I could use for serving you with a Notice?

This is for M F K and all parties are to be served with a Notice providing date and time of a prehearing conference and then a council hearing.

I look forward to hearing from you.

Thank you.

Sincerely,



Riddhi Mistry

Paralegal II, Civil Division

Pronouns: she/her/hers
Office of the City Attorney
15 W. Kellogg Blvd.

Saint Paul, MN 55102

P: 651-266-8835

Riddhi.mistry@ci.stpaul.mn.us

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From: Eric Hudak <Eric.Hudak@ci.stpaul.mn.us>

Sent: Tuesday, April 8, 2025 1:40 PM

To: e conlan <scootertramp46@gmail.com>

Cc: Dan Niziolek <dan.niziolek@ci.stpaul.mn.us>; Rebecca Noecker <Rebecca.Noecker@ci.stpaul.mn.us>; Riddhi Mistry <Riddhi.Mistry@ci.stpaul.mn.us>

Subject: RE: FW: MFK Auto 830 south robert street...

Hello Mr. Conlan,

As you note below, the owner of MFK has opted to request a hearing before City Council to contest the penalty.

City Attorney staff member Riddhi Mistry, copied, will send you an email with the date and time of the hearing once it has been scheduled.

Thanks for your continued patience.

Eric

(651) 266-9132

Eric Hudak
Licensing Manager

City of Saint Paul
Department of Safety & Inspections
375 Jackson Street, Suite 220
Saint Paul, MN 55101
P: (651) 266-9132
Email: Eric.Hudak@ci.stpaul.mn.us
www.StPaul.gov



SAINT PAUL
MINNESOTA

From: e conlan <scootertramp46@gmail.com>
Sent: Tuesday, April 8, 2025 7:53 AM
To: Eric Hudak <Eric.Hudak@ci.stpaul.mn.us>
Cc: Dan Niziolek <dan.niziolek@ci.stpaul.mn.us>; Rebecca Noecker <Rebecca.Noecker@ci.stpaul.mn.us>
Subject: Re: FW: MFK Auto 830 south robert street...

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

sorry--forgot to include the picture

On Tue, Apr 8, 2025 at 7:51 AM e conlan <scootertramp46@gmail.com> wrote:

Good Day. The MFK used car lot is back to the same practices of parking and servicing vehicles on the city streets. I have enclosed a picture of a truck parked on east winona(a half block west of Robert), that seems to show the auction number still on the driver's window.

I have been checking the City Council Agendas and haven't seen their notice of appeal for their previous fine---have I missed it ?

thank you

On Mon, Feb 10, 2025 at 11:01 AM Eric Hudak <Eric.Hudak@ci.stpaul.mn.us> wrote:

Mr. Conlan,

Thanks for your patience.

Attached find a Notice of Violation that has been mailed to MFK Auto today which requests a \$1000 fine and the imposition of additional/modified license conditions. Please contact me if questions.

Eric Hudak

(651) 266-9132

From: e conlan <scootertramp46@gmail.com>

Sent: Sunday, February 9, 2025 12:00 PM

To: Eric Hudak <Eric.Hudak@ci.stpaul.mn.us>

Cc: Dan Niziolek <dan.niziolek@ci.stpaul.mn.us>; Rebecca Noecker <Rebecca.Noecker@ci.stpaul.mn.us>

Subject: Re: FW: MFK Auto 830 south robert street...

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

Good Morning Eric

Any updates on the adverse licensing action against MFK auto ?

thank you

On Mon, Jan 27, 2025 at 10:57 AM Eric Hudak <Eric.Hudak@ci.stpaul.mn.us> wrote:

Hello Mr. Conlan,

The Department of Safety and Inspections sent a request for adverse licensing action against MFK to the City Attorney's Office on December 23, 2024. It's my current understanding that a Notice of Violation has been drafted and will be mailed to the MFK this week. I will forward you a copy once that takes place.

Eric Hudak

(651) 266-9132

Eric Hudak
Licensing Manager

City of Saint Paul
Department of Safety & Inspections
375 Jackson Street, Suite 220
Saint Paul, MN 55101
P: (651) 266-9132
Email: Eric.Hudak@ci.stpaul.mn.us
www.StPaul.gov



SAINT PAUL
MINNESOTA

From: e conlan <scootertramp46@gmail.com>
Sent: Saturday, January 25, 2025 5:39 AM
To: Eric Hudak <Eric.Hudak@ci.stpaul.mn.us>
Cc: Dan Niziolek <dan.niziolek@ci.stpaul.mn.us>; Rebecca Noecker <Rebecca.Noecker@ci.stpaul.mn.us>
Subject: Re: FW: MFK Auto 830 south robert street...

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

Good day Eric

I have not received any information on any adverse licensing action regarding the property at 830 south Robert street.

Was there any action ? Is action still pending ? Will there be any input from the neighborhood ?

thank you

On Wed, Dec 18, 2024 at 11:12 AM Eric Hudak <Eric.Hudak@ci.stpaul.mn.us> wrote:

Mr. Conlan,

The Department of Safety and Inspections is in process or requesting adverse licensing action against MFK through the City Attorney's Office (CAO). Once the CAO issues the associated Notice of Violation, which I expected will happen mid-January, I will forward you a copy.

Thanks for your continued patience.

Eric Hudak

(651) 266-9132

Eric Hudak
Licensing Manager

City of Saint Paul
Department of Safety & Inspections
375 Jackson Street, Suite 220
Saint Paul, MN 55101
P: (651) 266-9132
Email: Eric.Hudak@ci.stpaul.mn.us
www.StPaul.gov



SAINT PAUL
MINNESOTA

From: e conlan <scootertramp46@gmail.com>
Sent: Tuesday, December 17, 2024 5:50 PM
To: Eric Hudak <Eric.Hudak@ci.stpaul.mn.us>; Rebecca Noecker
<Rebecca.Noecker@ci.stpaul.mn.us>
Cc: Dan Niziolek <dan.niziolek@ci.stpaul.mn.us>
Subject: Re: FW: MFK Auto 830 south robert street...

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

I have waited for some word on the investigation of MFK, but have received nothing so far.

I ask, because the number of cars being stored/parked on the street has risen again. I also notice that cars being driven daily to MFK by "employees" also show up on their lot later, as being for sale. This is an interesting way to circumvent license restrictions.

I would appreciate any updates on actions being taken against MFK and owners.

thank you

On Sun, Nov 24, 2024 at 6:44 PM e conlan <scootertramp46@gmail.com> wrote:

Good Morning

I was driving today (Sunday) and noticed one of the "employees" from MFK conversing and seemingly returning a car or estimating repairs of a car in the area they normally park their cars on east Winona on the west side of Robert.

Another example of their having more vehicles than are on their lot, and a repair site that is on the street.

On Fri, Nov 8, 2024 at 4:15 PM Eric Hudak <Eric.Hudak@ci.stpaul.mn.us> wrote:

Hello E. Dan Conlan,

Your complaint and information request below was forwarded to me for follow-up.

You are correct, there are three separate City licenses issued to two separate license holders at 830 S. Robert St.

License Holder #1: MFK Enterprises, Moe Faryaneh Kia (651) 244-1661 – License Types: Auto Repair Garage and Secondhand Dealer Motor Vehicle

License Holder #2: Import Auto Sales, Mohammad Abedi (651) 225-9699 – License Type: Secondhand Dealer Motor Vehicle

City regulations and other information regarding these license types can be found by clicking these links:

[Auto Repair Garage](#)

[Secondhand Dealer – Motor Vehicle](#)

Additional restrictions (conditions) imposed upon the licenses held by both operators can be found in the accompanying attachments.

Auto repair licenses allow the repair of vehicles the license holder owns and their customers.

The City's Department of Inspections is currently investigating the businesses and, because of your current complaint, have scheduled an unannounced, on-site inspection that will take place within the next ten days. Once completed I will provide you the results and any related further action.

Thanks for providing the information. I'll look forward to contacting you again soon.

Eric Hudak

(651) 266-9132

Eric Hudak
Licensing Manager

City of Saint Paul
Department of Safety & Inspections
375 Jackson Street, Suite 220
Saint Paul, MN 55101
P: (651) 266-9132
Email: Eric.Hudak@ci.stpaul.mn.us
www.StPaul.gov



SAINT PAUL
MINNESOTA

From: Rebecca Noecker <Rebecca.Noecker@ci.stpaul.mn.us>
Sent: Tuesday, October 29, 2024 1:07 PM
To: e conlan <scootertramp46@gmail.com>
Cc: Dan Niziolek <dan.niziolek@ci.stpaul.mn.us>
Subject: RE: MFK Auto 830 south robert street

Hi Dan,

Yes, I'm cc'ing Dan Niziolek from the Dept of Safety and Inspections, licensing division, so he can respond.

Best,

Rebecca

Rebecca Noecker | Saint Paul City Councilmember, Ward 2

15 West Kellogg Blvd – Suite 310B | Saint Paul, MN 55102

651.266.8622 | rebecca.noecker@ci.stpaul.mn.us

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From: e conlan <scootertramp46@gmail.com>
Sent: Tuesday, October 29, 2024 10:19 AM
To: Rebecca Noecker <Rebecca.Noecker@ci.stpaul.mn.us>
Subject: MFK Auto 830 south robert street

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

Hello Rebeca

The on street parking from the car lot has decreased, but the repair of vehicles continues. They work on vehicles on east Wyoming on both sides of Robert. The enclosed pic shows a vehicle with dealers plates on jack stand--on the street, while they work on it. It was there for 2 days.

The property at 830 south Robert has at least two car sales licenses plus a repair license. I tried to get a copy of their repair license from the Secretary of State office, but apparently they want to charge for it.

Would you be willing to request a copy of all licenses and restrictions for 830 south Robert at no cost ?

I am trying to remember if their repair license was for their own vehicles. It seems they are repairing any and all vehicles now.

The license and restrictions should verify that.

thank you

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E. Dan Conlan

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Timeline of events related to the current adverse action against Licensee.

2000	Licensee agrees to the license conditions.
November 7, 2018	Resolution 18-331 for adverse action signed.
June 17, 2020	Resolution 20-795 for adverse action signed.
January 12, 2024	Resolution 24-23 for adverse action signed.
May 2, 2024	Department receives complaint.
May 3, 2024	Department investigates complaint.
July 1, 2024	Department sends Correction Notice.
September 11, 2024	Department receives complaint.
October 3, 2024	Department investigates complaint.
October 29, 2024	Neighbor complaint sent to City Council President Noeker.
November 14, 2024	Department conducts follow-up investigation.
November 24, 2024	Neighbor complaint sent to Department.
January 28, 2025	City Attorney's Office serves Notice of Violation.
February 4, 2025	Licensee requests a hearing before Council.
April 8, 2025	Neighbor complaint sent to Department.
May 13, 2025	City Attorney's Office serves Notice of Council Hearing.
June 4, 2025	Resolution 24-23 for adverse action sending this matter to an administrative hearing signed.

