## OFFICE OF THE CITY ATTORNEY

Sara Grewing, City Attorney



## CITY OF SAINT PAUL

Christopher B. Coleman, Mayor

Civil Division

400 City Hall

Telephone: 651 266-8710

15 West Kellogg Blvd.

Facsimile: 651 298-5619

Saint Paul, Minnesota 55102

January 28, 2014

## NOTICE OF INTENT TO REVOKE LICENSE

Nadif Ketibe 1318 Maynard Drive North, Apt. #468 Saint Paul, MN 55116

RE:

Taxicab Vehicle license for Cab #5366 held by Nadif Ketibe d/b/a Twin Cities Cab for the

City of Saint Paul

License ID #: 20130000881

## Dear Nadif Ketibe:

The Department of Safety and Inspections will recommend revocation of the Taxicab Vehicle license for Cab #5366 held by Nadif Ketibe d/b/a Twin Cities Cab for the City of Saint Paul. The basis for the recommendation is based on the following information:

According to DSI records, the service company you are affiliated with no longer meets the minimum of five (5) active licensed taxicabs in its fleet. Saint Paul Legislative Code § 376.10 (b) (2) requires that: "... A service company must maintain a minimum of five (5) licensed vehicles. If the number of licensed vehicles drops below five (5), the remaining licenses shall be revoked."

At this time, you have two (2) options how to proceed:

If you wish to admit the facts but you contest the penalty, you may have a public hearing before the Saint Paul City Council. You will need to send me a letter with a statement admitting to the facts and requesting a public hearing. I will need to receive your letter no later than Friday, February 7, 2014. The matter will then be scheduled before the City Council for a public hearing to determine whether to revoke your Taxicab Vehicle license for Cab #5366. You will have an opportunity to appear before the Council and make a statement on your own behalf.

Twin Cities Cab – Nadif Ketibe January 28, 2014 Page 2

2. If you <u>dispute the facts</u> outlined above, you may request a hearing before an Administrative Law Judge (ALJ). I will need to receive your letter no later than **Friday**, **February 7**, **2014**. At that hearing both you and the City will appear and present witnesses, evidence and cross-examine each other's witnesses. After receipt of the ALJ's report (usually within 30 days), a public hearing will need to be scheduled. At that time, the City Council will decide whether to adopt, modify or reject the ALJ's report and recommendation.

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

If you have not contacted me or DSI by Friday, February 7, 2014, I will assume that you do not contest the revocation of you Taxicab Vehicle license for Cab #5366. In that case, the matter will be placed on the City Council Consent Agenda for approval of the recommended penalty.

If you have questions about these options, please feel free to contact me at 266-8710.

Sincerely,

Seoffrey Karla JK

Assistant City Attorney

cc: Kristina Schweinler, Senior License Inspector, DSI

Tom Ferrara, DSI

Nadif Ketibe, Twin Cities Cab, 9217 – 17<sup>th</sup> Avenue South, Ste. 212, Bloomington, MN 55425 Abdinoor Dolal, Officer, Twin Cities Cab, 9217 – 17<sup>th</sup> Avenue South, Ste. 212, Bloomington, MN 55425

AFFIDAVIT OF SERVICE BY U.S. MAIL

COUNTY OF RAMSEY )

Julie Kraus, being first duly sworn, deposes and says that on the 28 she served the attached NOTICE OF INTENT TO REOVKE LICENSE and correct copy thereof in an envelope addressed as follows:

Nadif Ketibe 1318 Maynard Drive North, Apt. #468 Saint Paul, MN 55116

Nadif Ketibe Twin Cities Cab 9217 – 17<sup>th</sup> Avenue South, Ste. 212 Bloomington, MN 55425

Abdnoor Dolal, Officer Twin Cities Cab 9217 – 17<sup>th</sup> Avenue South, Ste. 212 Bloomington, MN 55425

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

Subscribed and sworn to before me

day of January 2014

Notary Public