

OFFICE OF THE CITY ATTORNEY
Sara Grewing, *City Attorney*



CITY OF SAINT PAUL
Christopher B. Coleman, Mayor

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

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

December 9, 2010

NOTICE OF INTENT TO REVOKE LICENSE

Abdinasir M. Noh
135 Winnipeg Avenue, Apt. 207
St. Paul, MN 55117

RE: Taxicab Driver license held by Abdinasir M. Noh d/b/a Abdinasir M. Noh for the
City of Saint Paul
License ID #: 20100001092

Dear Abdinasir M. Noh:

The Department of Safety and Inspections (DSI) has recommended revocation of the Taxicab Driver license held by Abdinasir M. Noh d/b/a Abdinasir M. Noh for the City of Saint Paul. The basis for the recommendation is as follows:

On November 12, 2010, your Taxicab Driver's license was confiscated by Saint Paul Police for failure to surrender it after your Minnesota Driver's License was suspended for failure to appear or pay fines. This is also a violation of Saint Paul Legislative Code § 376.16 (e) (8) (k) (1) which states: "Any person holding a taxicab driver's license whose Minnesota or Wisconsin driver's license is suspended, canceled or revoked for any reason shall immediately surrender his or her taxicab driver's license to the Department of Safety and Inspections..." and Legislative Code § 376.16 (e) (8) (k) (5) which states: "Failure to comply with provisions of this section shall be grounds for revocation of a taxicab driver's license."

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

1. If you wish to admit the facts but contest the penalty, you may have a public hearing before City Council. You will need to send me a letter with a statement admitting the facts and requesting a public hearing. We will need to receive your letter by **Monday, December 20, 2010**. The matter will then be scheduled before the City Council for a public hearing to determine whether to revoke your Taxi Driver license. You will have an opportunity to appear before the Council and make a statement on your own behalf.

Abdinasir M. Noh
December 9, 2010
Page 2

2. If you dispute that the above facts, you can request a hearing before an Administrative Law Judge. At that hearing both you and the City will be able to appear and present witnesses, evidence and cross-examine each other's witnesses. The St. Paul City Council will ultimately decide the case. If this is your choice, please advise me no later than **Monday, December 20, 2010**, and I will take the necessary steps to schedule the administrative hearing.

If you have not contacted me by that date, I will assume that you do not contest the revocation of your Taxicab Driver license. 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,



Rachel Tierney
Assistant City Attorney

cc: Christine Rozek, Deputy Director of DSI
Tom Ferrara, DSI

STATE OF MINNESOTA

vs.


AFFIDAVIT OF SERVICE BY U.S. MAIL

COUNTY OF RAMSEY)

Julie Kraus, being first duly sworn, deposes and says that on the 9th day of December, she served the attached **NOTICE OF INTENT TO REVOKE LICENSE** placing a true and correct copy thereof in an envelope addressed as follows:

Abdinasir M. Noh
135 Winnipeg Avenue, Apt. 207
St. Paul, MN 55117

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



Julie Kraus

Subscribed and sworn to before me
this 9th day of December, 2010



Notary Public

