



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

November 23, 2016

NOTICE OF INTENT TO SUSPEND LICENSE

Anthony Allan Jara  
1213 Bradley Street  
St. Paul, MN 55130

RE: Taxicab Driver license held by Anthony Allan Jara for the City of Saint Paul  
License ID #: 20100004374

Dear Mr. Jara:

The Department of Safety and Inspections will recommend suspension of the Taxicab Driver license held by Anthony Allan Jara for the City of Saint Paul. The recommendation is based on the following information:

**On September 16, 2016, the Department of Safety and Inspections (DSI) received a RENEWAL INVOICE from you requesting renewal of your Taxicab Driver license which was due to expire on October 1, 2016.**

**During a routine check of your driving record as part of the renewal process, DSI discovered that you were convicted of five (5) separate moving violations within the past three (3) years:**

- 1. Illegal Change of Course in Ramsey County on March 11, 2014**
- 2. Illegal or Improper Passing in Ramsey County on November 27, 2014**
- 3. Speeding in Ramsey County on January 25, 2015**
- 4. Speed (15 miles or more) in Hennepin County on May 9, 2015**
- 5. Fail to Exercise Due Care or Control in Ramsey County on September 19, 2015**

**The Minnesota Department of Vehicle Services suspended your license for a period of thirty (30) days which was reinstated as of May 13, 2016.**

**Saint Paul Legislative Code § 376.16 (e) (5) (c) states the basis for adverse action: "Must have a driving record meeting the following standards for renewal: No more than four (4) moving violations within the past three (3) years and no more than three (3) moving violations in the last year. A moving violation means, for this subsection, a violation of a traffic regulation but does not include a parking violation, vehicle equipment violation, or warning citation."**

At this time, you have three (3) 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 **Monday, December 5, 2016**. I will presume that you have chosen not to contest the proposed adverse action, and the matter will be placed on the City Council agenda for approval of the proposed remedy.
2. If you wish to admit the facts but you contest the penalty, you may have a public hearing before the Saint Paul City Council. You will need to send me a letter with a statement admitting to the facts and requesting a public hearing no later than **Monday, December 5, 2016**. The matter will then be scheduled before the City Council for a public hearing to determine whether to suspend your Taxicab Driver license. You will have an opportunity to appear before the Council and make a statement on your own behalf.
3. If you dispute the facts outlined above, or wish to present evidence that the conviction is not related to your license as a taxicab driver, or that you have been rehabilitated pursuant to Minn. Stat. §364.01 et seq, you may request a hearing before an Administrative Law Judge (ALJ). I will need to receive your letter no later than **Monday, December 5, 2016**. 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 by Monday, December 5, 2016, I will assume that you do not contest the suspension 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,



Therese Skarda  
Assistant City Attorney

cc: Ross Haddow, DSI

STATE OF MINNESOTA)  
 ) ss.

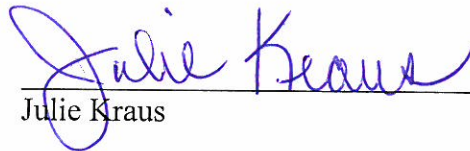
**AFFIDAVIT OF SERVICE BY U.S. MAIL**

COUNTY OF RAMSEY )

Julie Kraus, being first duly sworn, deposes and says that on the 23<sup>rd</sup> day of November she served the attached **NOTICE OF INTENT TO SUSPEND LICENSE** and a correct copy thereof in an envelope addressed as follows:

Anthony Allan Jara  
1213 Bradley Street  
St. Paul, MN 55130

(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 23<sup>rd</sup> day of November, 2016

  
\_\_\_\_\_  
Notary Public

