



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

April 18, 2011

NOTICE OF VIOLATION

Nader Nooryshokry
3N Enterprise
545 University Avenue West
St. Paul, MN 55103

RE: All licenses held by Nader Nooryshokry d/b/a 3N Enterprise for the premises located at 545 University Avenue West in Saint Paul
License ID #20020006155

Dear Nader Nooryshokry:

The Department of Safety and Inspections (DSI) will recommend adverse action against all licenses held by Nader Nooryshokry d/b/a 3N Enterprise for the premises located at 545 University Avenue West in Saint Paul. The basis for the recommendation is as follows:

On November 23, 2010, an inspector from the Department of Safety and Inspections (DSI) came to your establishment for an inspection and cited you for the following license condition violations:

- 1) There were 36 cars parked on the lot in violation of license condition #1 which states: *"No more than twenty-one (21) vehicles for sale are displayed on the lot, at any one time."*
- 2) The lot was so full that a customer would not have been able to pull into the lot in violation of license condition #4 which states: *"The interior maneuvering lane, illustrated on this plan, shall remain open unobstructed so that the vehicle entering or exiting the property are proceeding forward. No backing into the street or from the street to this property is allowed."*
- 3) There were four (4) cars parked on University Avenue that appeared to be associated with your business in violation of license condition #10 which states: *"All 'for sale' vehicles, associated with this business, must be parked on the lot. There shall be no parking on the street or any other public right-of-way."*

You were given until December 30, 2010 to bring your licensed establishment into compliance with your license conditions. On December 27, 2010, DSI records show your requested an extension and was given until January 14, 2011.

3. If you dispute the facts outlined above, you may request a hearing before an Administrative Law Judge (ALJ). 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. If this is your choice, please advise me no later than **Thursday, April 28, 2011**, and I will take the necessary steps to schedule the administrative hearing.

If you have not contacted me or the Senior License Inspector by Thursday, April 28, 2011, I will assume that you are not contesting 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 feel free to contact me at 266-8710.

Sincerely,



Kyle Lundgren
Assistant City Attorney

cc: Christine Rozek, Deputy Director of DSI
Nader Nooryshokry, 1556 Highview Avenue, Eagan, MN 55121
Tait Danielson Castillo, Executive Director, Frogtown Neighborhood Association, 685 Minnehaha Avenue
St. Paul, MN 55104

STATE OF MINNESOTA)
) s.

AFFIDAVIT OF SERVICE BY U.S. MAIL

COUNTY OF RAMSEY)

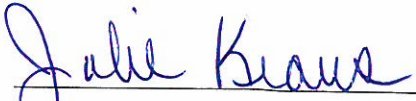
Julie Kraus, being first duly sworn, deposes and says that on the 19th day of April, she served the attached **NOTICE OF VIOLATION** and correct copy thereof in an envelope addressed as follows:

Nader Nooryshokry
3N Enterprise
545 University Avenue West
St. Paul, MN 55103

Nader Nooryshokry
1556 Highview Avenue
Eagan, MN 55121

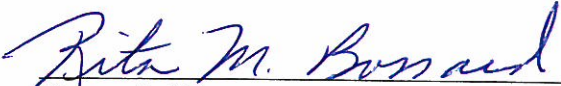
Tait Danielson Castillo, Executive Director
Frogtown Neighborhood Association
685 Minnehaha Avenue
St. Paul, MN 55104

(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 19th day of April, 2011



Notary Public

