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WILLIAM L. TILTON'S GEORGE R. DUNN" MICHAEL J. GROSS* GRACE DAVIES*4 "ALSO ADMITTED IN WISCONSIN
"'ALSO ADMITTED IN MASSACHUSETTS
""ALSO ADMITTED IN NEW YORK

*ALSO ADMITTED IN ILLINOIS

*PALSO ADMITTED IN CALIFORNIA (INACTIVE)

†CIVIL TRIAL SPECIALIST, CERTIFIED BY
MINNESOTA STATE BAR ASSOCIATION

December 9, 2016

VIA FACSIMILE: (651-298-5619)

Therese A. Skarda, Esq.
Assistant City Attorney, Civ. Div.
St. Paul City Attorney's Office
400 City Hall
15 West Kellogg Boulevard
Saint Paul, MN 55102

Re: All licenses held by Metro Bar & Grill, Inc. d/b/a Arnellia's for the premises

located at 1183 University Avenue West in St. Paul

License Id #: 0054523

Dear Ms. Skarda,

I represent Amellia's. This is in response to your Notice of Violation letter dated November 29, 2016.

As to the issue of the Smack Fest, we admit that the event occurred. We deny that it is a violation of any License condition. On that issue we request a hearing in front of the St. Paul City Council.

As to the second alleged violation, the 48-hour issue, we contest the facts and for that reason we request an administrative hearing.

Per the Minnesota Data Practices Act and other relevant law, I request a complete copy of all City of St. Paul records regarding Metro Bar & Grill, Inc. d/b/a Arnellia's for the last five years. This includes e-mail traffic involving any member of the Department of Safety & Inspections.

William I. Tilton

WLT/km

cc: Ms. Arnellia Allen

Mr. Jon Olson, Ex. Dir. of Hamline Midway Coalition