

CITY OF SAINT PAUL

Mayor Melvin Carter

Civil Division

400 City Hall 15 West Kellogg Blvd. Saint Paul, Minnesota 55102 Telephone: 651 266-8710 Facsimile: 651 298-5619

May 21, 2019

## NOTICE OF INTENT TO REVOKE LICENSE

Abdurahman Tolla 1611 Case Avenue St. Paul, MN 55106

RE: Taxicab Vehicle license #5036 held by Abdurahman Tolla d/b/a Airport Express Super Taxi for the City of Saint Paul, License ID #: 20150001415

Dear Mr. Tolla:

The Department of Safety and Inspections will recommend revocation of the Taxicab Vehicle license #5270 held by Abdurahman Tolla d/b/a Airport Express Super Taxi for the City of Saint Paul. The recommendation is based on the following information:

On February 7, 2019 your Taxicab Service Company President Jamal Adem was informed by the Department of Safety and Inspections (DSI) that he had now fallen below the minimum number of taxicabs (5) required to operate in Saint Paul per Saint Paul Legislative Code § 376.17 (a) (2).

DSI also sent you a letter On April 10, 2019 to renew Taxicab Vehicle license. You are currently still delinquent and therefore are no longer able to operate your taxicab legally in the City of Saint Paul.

At this time, you have four (4) 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**, **June 3**, **2019**. I will presume that you have chosen not to contest the proposed adverse action, and the matter will be placed on the next available 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, June 3, 2019. The matter will then be scheduled before the City Council for a public hearing to determine whether to revoke your Taxicab Driver license #5270. You will have an opportunity to appear before the Council and make a statement on your own behalf.
- 3. If you <u>dispute the facts</u> outlined above, you may request a hearing before an Administrative Law Judge (ALJ). You will need to send me a letter disputing the facts and requesting an administrative hearing no later than **Monday**, **June 3**, **2019**. 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.

May 21, 2019 Abdurahman Tolla- Licensee d/b/a Airport Express Super Taxi Page 2

4. If you no longer wish to do business in the City of Saint Paul, you will need to complete and return the attached REQUEST TO CANCEL LICENSE with the CITY OF SAINT PAUL to the Department of Safety and Inspections, at 375 Jackson Street, Ste. 220, St. Paul, Minnesota 55101-1806 no later than Monday, June 3, 2019.

<u>Please note:</u> 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, June 3, 2019, I will assume that you do not contest the revocation of your Taxicab Driver license #5270. In that case, the matter will be placed on the next available City Council Consent Agenda for approval of the recommended penalty.

If you have questions about these options, please feel free to contact my Legal Assistant, Shawn McDonald at (651) 266-8729.

Sincerely, Rarda S.m.

Therese Skarda Assistant City Attorney

cc: Abdurahman Tolla, Affiliate, Airport Express Super Taxi, 1611 Case Avenue., St. Paul, MN 55106 Ross Haddow, DSI

DEPARTMENT OF SAFETY AND INSPECTIONS (DSI) Reards X Constant, Director



## CITY OF SAINT PAUL

DSI Lizensing 375 Jackson Sweet, Suite 230 Sabu Paul, Morresota 35101-1806 Telephone: 653-266-8989 Faszimile: 653-266-9324 Web: www.stpani.gov/doi

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April 10, 2019

Airport Express Super Taxi 1540 Conway St. Saint Paul, MN 55106

Re: Taxicab Vehicle License Renewal Notice License #20150001415

Dear Mr. Abdurahman K. Tolla,

Our records show your Taxicab Vehicle license renewal date is 5/1/2019. You will not be issued your sticker until at least 5 other Airport Express Super Taxi Taxicab Vehicle licenses are renewed, along with the Taxicab Service Company license conditions that are current. This matter is urgent and needs to be taken care of immediately, if you wish to continue to operate in the City of Saint Paul.

If you have questions regarding this notice or wish to discuss this matter further, please contact our office between the hours of \$:00a.m. to 4:30 p.m. at 651-266-9143 or you may e-mail me at ross.haddow@ci.stpaul.mn.us

Respectfully,

Ross Haddow DSI Inspector III

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) SS.

## AFFIDAVIT OF SERVICE BY U.S. MAIL

COUNTY OF RAMSEY)

Shawn McDonald, being first duly sworn, deposes and says that on the 21<sup>st</sup> day of May, he served the attached **NOTICE OF INTENT TO REVOKE LICENSE** and a correct copy thereof in an envelope addressed as follows:

Abdurahman Tolla 1611 Case Avenue St. Paul, MN 55106

Ross Haddow, DSI

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

Shawn McDonald

Subscribed and sworn to before me This 21<sup>st</sup> day of May 2019

Notary Public

