



SCANNED

4501 Allendale Drive
St. Paul, MN 55127
craig@midwestbizlaw.com
(651) 217-8124

RECEIVED

FEB 16 2023

CITY ATTORNEY

February 14, 2023

Via Email and US Mail

Office of the City Attorney
Attn: Therese Skarda, Esq.
Civil Division, 15 Kellogg Blvd. West, 400 City Hall
Saint Paul, MN 55102

RE: MJ Market Inc., Majid Nitaishoon, Cigarette/Tobacco License for the premises
located at 922 Thomas Avenue, St. Paul, MN. License ID# 20210001131

Dear Ms. Skarda:

This firm represents Mr. Nitaishoon/MJ Market, Inc. I am in receipt of a document sent to MJ Market Inc. dated January 31, 2023, wherein you request a letter disputing the facts alleged in this matter no later than February 14, 2023. Per the NOV, please consider this a formal request for a hearing before an Administrative Law Judge.

It is our client's position that the City of Saint Paul, among other things, is acting in an arbitrary and capricious manner as it relates to the allegations in the Notice of Violation and Request for Revocation of License dated January 31, 2023 and application of the relevant city ordinances.

If you have any questions or concerns, please contact me via email address craig@midwestbizlaw.com or by phone at (601) 594-0924. Thank you.

Sincerely,

Craig J. Beuning #0316660
Midwest Business Law, PLLC

Attorneys for MJ Market Inc. d/b/a MJ Market and Majid Nitaishoon

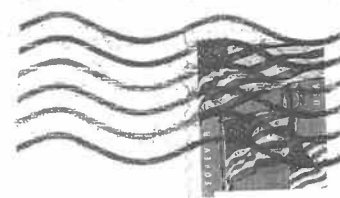




Midwest Business Law PLLC
4501 Allendale Drive
Vadnais Heights MN 55127

SAINT PAUL MN 550

14 FEB 2023 PM 4 L



RECEIVED
FEB 16 2023
CITY ATTORNEY

Office of the City Attorney
Attn: Therese Skarda, Esq.
Civil Division, 15 Kellogg Blvd. West,
400 City Hall
Saint Paul, MN 55102

55102-772300

