

**From:** [Monica Shaffer](#)  
**To:** [Chris Heinze](#); [Riddhi Mistry](#)  
**Cc:** [Samir Grover](#); [Jake Manske](#)  
**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027  
**Date:** Monday, June 8, 2026 8:15:19 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Hello Chris,

We did not hear back from you and will be proceeding with this adverse action. We will draft a resolution and this will be placed on the City Council consent agenda to impose the \$500 matrix penalty and amended conditions.

Monica Shaffer  
Assistant City Attorney  
P: (651) 266-8548

---

**From:** Monica Shaffer  
**Sent:** Monday, June 1, 2026 10:56 AM  
**To:** 'Chris Heinze' <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>; Riddhi Mistry <[Riddhi.Mistry@ci.stpaul.mn.us](mailto:Riddhi.Mistry@ci.stpaul.mn.us)>  
**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>; Jake Manske <[jake@libbylawoffice.com](mailto:jake@libbylawoffice.com)>  
**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

Thank you for letting me know, Chris. Please provide your answer by the end of the day on Wednesday.

Monica Shaffer  
Assistant City Attorney  
P: (651) 266-8548

---

**From:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>  
**Sent:** Friday, May 29, 2026 5:04 PM  
**To:** Monica Shaffer <[Monica.Shaffer@ci.stpaul.mn.us](mailto:Monica.Shaffer@ci.stpaul.mn.us)>; Riddhi Mistry <[Riddhi.Mistry@ci.stpaul.mn.us](mailto:Riddhi.Mistry@ci.stpaul.mn.us)>  
**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>; Jake Manske <[jake@libbylawoffice.com](mailto:jake@libbylawoffice.com)>  
**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

**Think Before You Click:** This email originated **outside** our organization.

Hi Monica,

Going to need just a couple more days, apologies – we have been experiencing power

outages at the office the last few days, which luckily is all fixed now, but for a while we were without power, and then even when the power came on, we were without internet, affecting our ability to access documents, etc.

Nonetheless, I'm going to put some work on this into the weekend and hope to have you something early next week – I'll let you know if that changes for any reason. Appreciate your flexibility.

Chris



Christopher J. Heinze, Esq.  
Libby Law Office, P.A.  
855 Rice Street, Suite 100  
St. Paul, MN 55117  
(651) 487-1208  
(651) 487-0662 facsimile  
(651) 289-6163 direct  
[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)

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---

**From:** Monica Shaffer <[Monica.Shaffer@ci.stpaul.mn.us](mailto:Monica.Shaffer@ci.stpaul.mn.us)>  
**Sent:** Thursday, May 28, 2026 8:10 AM  
**To:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>; Riddhi Mistry <[Riddhi.Mistry@ci.stpaul.mn.us](mailto:Riddhi.Mistry@ci.stpaul.mn.us)>  
**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>; Jake Manske <[jake@libbylawoffice.com](mailto:jake@libbylawoffice.com)>  
**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

Thanks for letting us know! And I appreciate you getting us a response by the end of this week.

Monica Shaffer  
Assistant City Attorney  
P: (651) 266-8548

---

**From:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>  
**Sent:** Wednesday, May 27, 2026 5:18 PM  
**To:** Monica Shaffer <[Monica.Shaffer@ci.stpaul.mn.us](mailto:Monica.Shaffer@ci.stpaul.mn.us)>; Riddhi Mistry <[Riddhi.Mistry@ci.stpaul.mn.us](mailto:Riddhi.Mistry@ci.stpaul.mn.us)>  
**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>; Jake Manske <[jake@libbylawoffice.com](mailto:jake@libbylawoffice.com)>  
**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

**Think Before You Click:** This email originated **outside** our organization.

Hi Monica,

I'm just getting to view the footage today – I had out of town hearings last week.

I should have our response to you on Friday.

Also, and for whatever it is worth, we did finally receive the envelope in which you attempted to send the first flash drive. The envelope is ripped and there was nothing inside – my guess is it went through the scanning machine and got crunched.

Chris



Christopher J. Heinze, Esq.  
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[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)

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**From:** Monica Shaffer <[Monica.Shaffer@ci.stpaul.mn.us](mailto:Monica.Shaffer@ci.stpaul.mn.us)>  
**Sent:** Thursday, May 21, 2026 12:31 PM  
**To:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>; Riddhi Mistry <[Riddhi.Mistry@ci.stpaul.mn.us](mailto:Riddhi.Mistry@ci.stpaul.mn.us)>  
**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>; Jake Manske <[jake@libbylawoffice.com](mailto:jake@libbylawoffice.com)>  
**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

Hello,

I dropped off the USB with the person at the front desk last night (Roger?). Please review and provide your response by EOD Wednesday (5/27).

Thank you for helping us move this forward,

Monica Shaffer  
Assistant City Attorney  
P: (651) 266-8548

---

**From:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>  
**Sent:** Tuesday, May 19, 2026 4:14 PM  
**To:** Monica Shaffer <[Monica.Shaffer@ci.stpaul.mn.us](mailto:Monica.Shaffer@ci.stpaul.mn.us)>; Riddhi Mistry <[Riddhi.Mistry@ci.stpaul.mn.us](mailto:Riddhi.Mistry@ci.stpaul.mn.us)>  
**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>; Jake Manske <[jake@libbylawoffice.com](mailto:jake@libbylawoffice.com)>  
**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

**Think Before You Click:** This email originated **outside** our organization.

Hi Monica,

You can certainly drop off the footage at our offices, which is just in the signature below. I warn you – Rice street is currently under major construction (putting in new sewers, road repaving, etc.) - you can still access our building (with off street parking) during the construction, but it's not the most intuitive and you have to partially drive on a dirt road.

On the penalty – I'll take the blame – I misunderstood communications from my client.  
That said, the \$500 penalty is not anything we take any issue with and will be paid.

Chris



Christopher J. Heinze, Esq.  
Libby Law Office, P.A.  
855 Rice Street, Suite 100  
St. Paul, MN 55117  
(651) 487-1208  
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(651) 289-6163 direct  
[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)

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**From:** Monica Shaffer <[Monica.Shaffer@ci.stpaul.mn.us](mailto:Monica.Shaffer@ci.stpaul.mn.us)>  
**Sent:** Monday, May 18, 2026 9:28 AM  
**To:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>; Riddhi Mistry <[Riddhi.Mistry@ci.stpaul.mn.us](mailto:Riddhi.Mistry@ci.stpaul.mn.us)>  
**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>; Jake Manske <[jake@libbylawoffice.com](mailto:jake@libbylawoffice.com)>  
**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

Hello,

Please let me know when I can drop off the flash drive. We need to continue moving forward with this item.

Also, you mentioned that your client intended to pay the \$500 matrix penalty, but that has not been received by DSI.

Please let me know when I can drop off the video footage.

Monica Shaffer  
Assistant City Attorney  
P: (651) 266-8548

---

**From:** Monica Shaffer  
**Sent:** Monday, May 11, 2026 8:52 AM  
**To:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>; Riddhi Mistry <[Riddhi.Mistry@ci.stpaul.mn.us](mailto:Riddhi.Mistry@ci.stpaul.mn.us)>  
**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>; Jake Manske <[jake@libbylawoffice.com](mailto:jake@libbylawoffice.com)>  
**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

Good morning,

Unfortunately, we don't have a way to share the video using an online route, but I can arrange to drop it off at your office. What hours is your office open this week?

Thank you so much for your patience and for paying the matrix penalty. I will be sure and get the videos to your office this week.

Monica Shaffer  
Assistant City Attorney  
P: (651) 266-8548

---

**From:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>  
**Sent:** Friday, May 8, 2026 4:41 PM  
**To:** Riddhi Mistry <[Riddhi.Mistry@ci.stpaul.mn.us](mailto:Riddhi.Mistry@ci.stpaul.mn.us)>  
**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>; Jake Manske <[jake@libbylawoffice.com](mailto:jake@libbylawoffice.com)>; Monica Shaffer <[Monica.Shaffer@ci.stpaul.mn.us](mailto:Monica.Shaffer@ci.stpaul.mn.us)>  
**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

**Think Before You Click:** This email originated **outside** our organization.

Riddhi,

We still have not received the video, regrettably. Should we consider other ways of obtaining it? Perhaps a shared file online?

Also – our client, in good faith, already sent in the fine amount, as he has no issues with paying that amount, as we work through these other issues.

Chris



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**From:** Riddhi Mistry <[Riddhi.Mistry@ci.stpaul.mn.us](mailto:Riddhi.Mistry@ci.stpaul.mn.us)>  
**Sent:** Tuesday, May 5, 2026 3:02 PM  
**To:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>  
**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>; Jake Manske <[jake@libbylawoffice.com](mailto:jake@libbylawoffice.com)>; Monica Shaffer <[Monica.Shaffer@ci.stpaul.mn.us](mailto:Monica.Shaffer@ci.stpaul.mn.us)>  
**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

Hi Chris,

Thanks for getting back to me. Hopefully, it arrives in the next day or two I appreciate you keeping me in the loop!

Sincerely,

|               |
|---------------|
| Riddhi Mistry |
|---------------|



**SAINT PAUL**  
**MINNESOTA**

*Paralegal II, Civil Division*  
Pronouns: she/her/hers  
Office of the City Attorney  
15 W. Kellogg Blvd.  
Saint Paul, MN 55102  
P: 651-266-8835

[Riddhi.mistry@ci.stpaul.mn.us](mailto:Riddhi.mistry@ci.stpaul.mn.us)

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---

**From:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>

**Sent:** Tuesday, May 5, 2026 2:51 PM

**To:** Riddhi Mistry <[Riddhi.Mistry@ci.stpaul.mn.us](mailto:Riddhi.Mistry@ci.stpaul.mn.us)>

**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>; Jake Manske <[jake@libbylawoffice.com](mailto:jake@libbylawoffice.com)>; Monica Shaffer <[Monica.Shaffer@ci.stpaul.mn.us](mailto:Monica.Shaffer@ci.stpaul.mn.us)>

**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

**Think Before You Click:** This email originated **outside** our organization.

Hi Riddhi,

I checked with our office manager, and the USB stick was not in today's mail. Fingers crossed for tomorrow. In any event I'll let you know once it has arrived.

Chris



Christopher J. Heinze, Esq.  
Libby Law Office, P.A.  
855 Rice Street, Suite 100  
St. Paul, MN 55117  
(651) 487-1208  
(651) 487-0662 facsimile  
(651) 289-6163 direct

[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)

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**From:** Riddhi Mistry <[Riddhi.Mistry@ci.stpaul.mn.us](mailto:Riddhi.Mistry@ci.stpaul.mn.us)>  
**Sent:** Tuesday, May 5, 2026 11:56 AM  
**To:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>  
**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>; Jake Manske <[jake@libbylawoffice.com](mailto:jake@libbylawoffice.com)>; Monica Shaffer <[Monica.Shaffer@ci.stpaul.mn.us](mailto:Monica.Shaffer@ci.stpaul.mn.us)>  
**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

Hey Chris,

Just following up with you if you received our mail containing the USB stick of the surveillance video footage?

Thank you.

Sincerely,



---

**From:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>  
**Sent:** Wednesday, April 29, 2026 4:28 PM  
**To:** Riddhi Mistry <[Riddhi.Mistry@ci.stpaul.mn.us](mailto:Riddhi.Mistry@ci.stpaul.mn.us)>  
**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>; Jake Manske <[jake@libbylawoffice.com](mailto:jake@libbylawoffice.com)>; Monica Shaffer <[Monica.Shaffer@ci.stpaul.mn.us](mailto:Monica.Shaffer@ci.stpaul.mn.us)>

**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

**Think Before You Click:** This email originated **outside** our organization.

Will do – thank you for the email, and we will be in touch once we are in receipt.

Chris



Christopher J. Heinze, Esq.  
Libby Law Office, P.A.  
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(651) 487-0662 facsimile  
(651) 289-6163 direct  
[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)

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---

**From:** Riddhi Mistry <[Riddhi.Mistry@ci.stpaul.mn.us](mailto:Riddhi.Mistry@ci.stpaul.mn.us)>

**Sent:** Wednesday, April 29, 2026 1:49 PM

**To:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>

**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>; Jake Manske <[jake@libbylawoffice.com](mailto:jake@libbylawoffice.com)>; Monica Shaffer <[Monica.Shaffer@ci.stpaul.mn.us](mailto:Monica.Shaffer@ci.stpaul.mn.us)>

**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

Hello Christopher,

Since we have not heard back from you, we have gone ahead and mailed the USB drive to your

office, under your attention.

Once you have received it, could you please confirm receipt.

Thank you.

Sincerely,



---

**From:** Monica Shaffer <[Monica.Shaffer@ci.stpaul.mn.us](mailto:Monica.Shaffer@ci.stpaul.mn.us)>

**Sent:** Wednesday, April 29, 2026 9:11 AM

**To:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>

**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>; Jake Manske <[jake@libbylawoffice.com](mailto:jake@libbylawoffice.com)>; Riddhi Mistry <[Riddhi.Mistry@ci.stpaul.mn.us](mailto:Riddhi.Mistry@ci.stpaul.mn.us)>

**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

Hello all,

I've added my paralegal, Riddhi, to this email. She's in the process of making the drive for you and will get it in the mail today or tomorrow. Please provide her with any mailing instructions.

Monica Shaffer

Assistant City Attorney

P: (651) 266-8548

---

**From:** Monica Shaffer

**Sent:** Tuesday, April 28, 2026 1:07 PM

**To:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>

**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>; Jake Manske <[jake@libbylawoffice.com](mailto:jake@libbylawoffice.com)>

**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

Absolutely, happy to extend the deadline as needed to be sure you're able to view the footage. DSI reviewed the footage that Wilebski's sent in response to the letter from Eric Hudak. I'll keep the process moving on my end, but that is the footage DSI reviewed.

Monica Shaffer  
Assistant City Attorney  
P: (651) 266-8548

---

**From:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>

**Sent:** Tuesday, April 28, 2026 12:12 PM

**To:** Monica Shaffer <[Monica.Shaffer@ci.stpaul.mn.us](mailto:Monica.Shaffer@ci.stpaul.mn.us)>

**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>; Jake Manske <[jake@libbylawoffice.com](mailto:jake@libbylawoffice.com)>

**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

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Thanks for the update Monica.

I'll check with my client, but I want to make sure that the footage I look at is the same footage that the city is relying upon as set forth in the "factual basis for adverse action" section of the notice – want to ensure that I'm looking at the same thing that you did.

Understood that it could take a little more time that we'd like to get that – all I would ask is that my client's time to respond is adjusted depending upon when the video is delivered.

Let me know at your convenience.

Thanks,  
Chris



Christopher J. Heinze, Esq.  
Libby Law Office, P.A.  
855 Rice Street, Suite 100  
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(651) 487-1208  
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(651) 289-6163 direct

[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)

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---

**From:** Monica Shaffer <[Monica.Shaffer@ci.stpaul.mn.us](mailto:Monica.Shaffer@ci.stpaul.mn.us)>  
**Sent:** Tuesday, April 28, 2026 12:08 PM  
**To:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>  
**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>  
**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

Hey Chris,

Still working on the footage. It's possible Wilebski's still has it (the footage is from their cameras) and that might be a faster way to get it while we get it transferred to a format that we can provide to you.

Attached is a clean copy of the current license conditions.

Monica Shaffer  
Assistant City Attorney  
P: (651) 266-8548

---

**From:** Monica Shaffer  
**Sent:** Monday, April 27, 2026 2:49 PM  
**To:** 'Chris Heinze' <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>  
**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>  
**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

I have put in a request for the video surveillance footage—would you like to see the patron/staff violations or the homicide-related footage? I have attached the track-change version of the license conditions, but will get a clean copy for you of the current conditions that should be easier to read.

Monica Shaffer  
Assistant City Attorney  
P: (651) 266-8548

---

**From:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>

**Sent:** Monday, April 27, 2026 1:57 PM  
**To:** Monica Shaffer <[Monica.Shaffer@ci.stpaul.mn.us](mailto:Monica.Shaffer@ci.stpaul.mn.us)>  
**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>  
**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

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Thanks Monica.

Couple questions – while your letter goes through what the city would like to see for amended license conditions, it doesn't set forth what the current conditions are (for the ones you are proposing to change – specifically 1, 2, 4, 6, 7, 8, 9, 10, and 11). Can you either send those over to me or otherwise point me to where I can see them?

Additionally – your letter references video footage as the primary factual basis for the adverse action – can you forward to me the surveillance footage as referenced in your letter?

Thank you,  
Chris



Christopher J. Heinze, Esq.  
Libby Law Office, P.A.  
855 Rice Street, Suite 100  
St. Paul, MN 55117  
(651) 487-1208  
(651) 487-0662 facsimile  
(651) 289-6163 direct  
[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)

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**From:** Monica Shaffer <[Monica.Shaffer@ci.stpaul.mn.us](mailto:Monica.Shaffer@ci.stpaul.mn.us)>  
**Sent:** Monday, April 27, 2026 1:49 PM  
**To:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>  
**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>  
**Subject:** RE: Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

Looks correct, thanks Chris!

Monica Shaffer  
Assistant City Attorney  
P: (651) 266-8548

---

**From:** Chris Heinze <[chris@libbylawoffice.com](mailto:chris@libbylawoffice.com)>  
**Sent:** Monday, April 27, 2026 1:47 PM  
**To:** Monica Shaffer <[Monica.Shaffer@ci.stpaul.mn.us](mailto:Monica.Shaffer@ci.stpaul.mn.us)>  
**Cc:** Samir Grover <[samir@libbylawoffice.com](mailto:samir@libbylawoffice.com)>  
**Subject:** Richard Defoe / Wilebskis Blues Saloon - License ID #0096027

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Monica,

This email confirms our conversation earlier today regarding the above. Specifically, we agreed that my client shall have until May 4, 2026 to respond to your Notice of Violation dated April 15, 2026.

Please let me know if any of the above is incorrect.

Thank you,  
Chris



Christopher J. Heinze, Esq.  
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