



July 2, 2026

**AMENDED NOTICE OF VIOLATION AND IMPOSITION OF RECOMMENDED
RESTITUTION**

ST. PAWS LLC
323 Maple Island Road
Burnsville, MN 55306

Attn: Thomas Paul Dunn

RE: Amended Notice of Violation of Saint Paul Legislative Code § 233 and Saint Paul
Legislative Code § 224 and Recommended Restitution

Dear Mr. Dunn:

The Department of Human Rights and Equal Economic Opportunity (the "Department") has discovered that it incorrectly calculated certain financial remedies owed by ST. PAWS LLC (the "Employer") to former employees for violations of Saint Paul Legislative Code §§ 233 and 224 (the "Ordinances"). The Department has corrected its calculations and now issues this Amended Notice of Violation and Imposition of Recommended Restitution (the "Amended Notice") and the attached Amended Determination of Violation in Case File #24-20 (the "Amended Determination").¹ This Amended Notice and the Amended Determination take the place of the original notice (the "Original Notice") and original determination (the "Original Determination"), which the Department sent via certified mail on June 1, 2026.

As detailed in the Amended Determination, the Department has determined that cause exists to believe that the Employer failed to provide employees with earned sick and safe time and to pay employees the minimum wage in violation of the Ordinances. This is your official notice of violation pursuant to Sections 233.13(e) and 224.13(e) of the Ordinances.

Based on the Amended Determination, the Director of the Department is recommending to the City Council that the Employer pay a total of **\$40,201.23 in restitution** to impacted employees,

¹ "ESST accrues only in hour-unit increments; with no accrual of a fraction of any hour of earned sick and safe time." Saint Paul Legislative Code, § 233.03(b). The Original Determination rounded the ESST hours withheld to the nearest whole number. The Department has reviewed this and determined that it is more appropriate to always round the withheld ESST hours down to the next lowest whole number. This ensures that employees are not accruing an hour that has not been fully earned.

which includes \$12,077.23 in back pay and \$28,124.00 in liquidated damages.² Back pay is the amount the Department has calculated that the Employer owes to employees in lost wages and withheld earned sick and safe time. Pursuant to the Earned Sick and Safe Time Ordinance, liquidated damages per employee may be the higher of \$250 or the amount of ESST withheld from that employee multiplied by two (2). Pursuant to the Minimum Wage Ordinance, liquidated damages may be the higher of \$250 or the dollar amount of wages withheld from an employee.³

You have three (3) options to proceed:

1. If you do not contest the violation and the recommended restitution, you may do nothing. If I have not heard from you on or before **July 24, 2026**, I will presume that you have chosen not to contest the violation, and the matter will be placed on the City Council agenda for imposition of the recommended restitution.
2. You can pay the recommended restitution. If this is your choice, you should make payment directly to the employees and provide proof of payment to the Department by no later than **July 24, 2026**. If you choose this option, please contact the Department immediately. This option avoids this matter appearing on the City Council agenda.
3. If you dispute the facts of the violation outlined in the Amended Determination or contest the recommended restitution amount, you may request a hearing before an Administrative Law Judge (ALJ). To accept this option, please send me a letter disputing the facts and/or contesting the recommended restitution amount and requesting a hearing no later than **July 24, 2026**. At that hearing, both you and the City will appear and present witnesses and evidence and be able to cross-examine each other's witnesses. After receipt of the ALJ's report and recommendation (usually within 30 days), a City Council hearing will be scheduled. At that time, the City Council will decide whether to adopt, modify, or reject the ALJ's report and recommendation.

Please note: If you choose a hearing before an ALJ as outlined in option 3 above, the Department reserves the right to request that the City Council impose the costs of the hearing on you per §§ 233.13(g)(3) and 224.13(g)(3) of the Ordinances.

² The Original Notice and Original Determination recommended that the Employer pay a total of **\$29,398.04 in restitution** to impacted employees, which included \$12,712.44 in back pay and \$16,685.60 in liquidated damages. These numbers failed to capture that liquidated damages under the ESST Ordinance are the amount of ESST withheld from an employee multiplied by two (2). This Amended Notice and the Amended Determination have corrected this issue.

³ The Original Determination had a combined MW back pay and liquidated damages column that incorrectly listed the total restitution owed for minimum wage violations as the greater of \$250 per underpaid employee or two times the back pay owed to each underpaid employee. The Amended Determination has split MW back pay and liquidated damages into two columns and the calculations have been corrected to comply with Saint Paul Legislative Code, § 224.13(i)(4).



SAINT PAUL
HUMAN RIGHTS & EQUAL
ECONOMIC OPPORTUNITY

DEPARTMENT OF HUMAN RIGHTS &
EQUAL ECONOMIC OPPORTUNITY (HREEO)

15 Kellogg Boulevard West, 280 City Hall
Saint Paul, MN 55102
Tel: 651-266-8966

If you have not contacted the Department by July 24, 2026, I will assume that you do not contest the violation or the recommended restitution. In that case, the matter will be placed on the City Council agenda for approval of the recommended restitution.

If you have questions about these options, please contact LaborStandards@stpaul.gov or 651-266-8966.

Sincerely,

/s/

Andrea Ledger
Interim Director
Human Rights and Equal Economic Opportunity
City of Saint Paul