STATE OF MINNESOTA)
) ss. **AFFIDAVIT OF SERVICE BY U.S. MAIL**

COUNTY OF RAMSEY)

Megan Marcouiller, being first duly sworn, deposes and says that on the twenty-second day of October she served the attached **NOTICE OF VIOLATION AND REQUEST FOR REVOCATION OF LICENSE** and a correct copy thereof in an envelope addressed as follows:

White Dragon Catering Inc.
d/b/a White Dragon Hall LLC
1600 White Bear Ave. N. Unit C
Saint Paul, MN 55106
Attn: Khang Chang

Khang Chang
3111 N. 4th St.
Minneapolis, MN 55411

Hillcrest Center LLC
375 Jackson St. Suite 700W
St. Paul, MN 55101-1810

Caty Royce and Tia Williams, Co-Executive Directors
501 Dale Street N
Saint Paul, MN 55104

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

M. Marcouiller
Megan Marcouiller

Subscribed and sworn to before me
This twenty-second day of October 2025

Christine M. Haas
Notary Public

CHRISTINE M. HAAS
Notary Public-Minnesota
My Commission Expires Jan. 31, 2028

SAINT PAUL
CITY ATTORNEY

OFFICE OF THE CITY ATTORNEY
LYNDSEY M. OLSON, CITY ATTORNEY

Civil Division, 15 Kellogg Blvd. West, 400 City Hall
Saint Paul, MN 55102
Tel: 651-266-8755 | Fax: 651-298-5619

October 22, 2025

NOTICE OF VIOLATION AND
REQUEST FOR REVOCATION OF LICENSE

White Dragon Catering Inc.
d/b/a White Dragon Hall LLC
1600 White Bear Ave. N. Unit C
Saint Paul, MN 55106
Attn: Khang Chang

RE: Liquor On Sale 291 or More Seats; Liquor On-Sale Sunday; and Entertainment (B) license held by White Dragon Catering Inc. d/b/a White Dragon Hall LLC for the premises located at 1600 White Bear Ave. N. Unit C, in Saint Paul.
License ID #: 20210000632

Dear Licensee:

The Department of Safety and Inspections ("Department") has recommended adverse action against the Liquor On-Sale 291 or More Seats; Liquor On Sale Sunday; and Entertainment (B) license held by White Dragon Catering Inc. d/b/a White Dragon Hall LLC ("Licensee") for the premises located at 1600 White Bear Ave. N. Unit C (Licensed Premises").

Legal Basis for Action:

Saint Paul Legislative Code section 310.01 defines "Adverse Action" as:

> "the revocation or suspension of a license, the imposition of conditions upon a license, the denial of an application for the grant, issuance, or renewal of a license, the imposition of a fine, the assessment of the costs of a contested hearing, and any other disciplinary or unfavorable action taken with respect to a license, licensee, or applicant for a license. Adverse action includes any of the foregoing directed at one (1) or more licenses held by a licensee at any location in the city. Adverse action also includes disapproval of licenses issued by the state under statutory provisions which permit the governing body to disapprove the issuance of the license."

SAINT PAUL
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Minnesota Statutes section 270C.72, subdivision 1, states:

> (a) The state or a political subdivision of the state may not issue, transfer, or renew, and must revoke, a license for the conduct of a profession, occupation, trade, or business, if the commissioner notifies the licensing authority that the applicant owes the state delinquent taxes payable to the commissioner, penalties, or interest. The commissioner may not notify the licensing authority unless the applicant taxpayer owes $500 or more in delinquent taxes, penalties, or interest, or has not filed returns. If the applicant taxpayer does not owe delinquent taxes, penalties, or interest, but has not filed returns, the commissioner may not notify the licensing authority unless the taxpayer has been given 90 days' written notice to file the returns or show that the returns are not required to be filed.
>
> (b) Within ten days after receipt of the notification from the commissioner under paragraph (a), the licensing authority must notify the license holder by certified mail of the potential revocation of the license for the applicable reason under paragraph (a). The notice must include a copy of the commissioner's notice to the licensing agency and information, in the form specified by the commissioner, on the licensee's option for receiving a tax clearance from the commissioner. The licensing authority must revoke the license 30 days after receiving the notice from the commissioner, unless it receives a tax clearance from the commissioner as provided in paragraph (c).
>
> (c) A licensing authority that has received a notice from the commissioner may issue, transfer, renew, or not revoke the applicant's license only if (1) the commissioner issues a tax clearance certificate and (2) the commissioner or the applicant forwards a copy of the clearance to the authority. The commissioner may issue a clearance certificate only if the applicant does not owe the state any uncontested delinquent taxes, penalties, or interest and has filed all required returns.

Adverse Action Recommendation:

The Department will recommend a revocation of license for violating Minnesota Statutes section 270C.72.

Factual Basis for Revocation of License:

On September 15, 2025, the Minnesota Department of Revenue sent a Notice of License Revocation to the City of Saint Paul ("City") to notify the Department that the City may be required to revoke all licenses issued to Licensee and directing the Department to notify Licensee.

SAINT PAUL
CITY ATTORNEY

OFFICE OF THE CITY ATTORNEY
LYNDSEY M. OLSON, CITY ATTORNEY

Civil Division, 15 Kellogg Blvd. West, 400 City Hall
Saint Paul, MN 55102
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On September 19, 2025, Eric Hudak, Licensing Manager for the Department, sent a letter to Licensees Khang Chang and Long Yang that informed them that the City may be required to recommend revocation of the license issued to Licensee unless the City received a clearance certificate from the Minnesota Department of Revenue within 30 days.

On October 20, 2025, the Minnesota Department of Revenue representative Jennifer, phone number (651) 556-3717, advised Eric Hudak that no clearance certificate had been issued to Licensee.

You have two (2) options to proceed:

1. You may do nothing. Pursuant to the Notice of License Revocation from the Minnesota Department of Revenue, this matter will be placed on the **November 5, 2025**, City Council consent agenda for revocation of your Liquor On Sale 291 or More Seats; Liquor On Sale Sunday; and Entertainment (B) license.

2. If you wish to keep your license, you must pay the outstanding balance. This may be paid with a certified check, cashier's check, money order, or cash, and payment must be brought to the Minnesota Department of Revenue, located at 600 North Robert Street, St. Paul, MN 55101. You may also pay with a bank transfer or credit card payment by calling the Collection Division at (651) 556-3003. If you pay the outstanding balance, the Minnesota Department of Revenue must notify the City by contacting the Department or my paralegal, Riddhi Mistry, and the City will remove this revocation from the consent agenda.

If you have questions about these options, please contact my paralegal Riddhi Mistry at riddhi.mistry@ci.stpaul.mn.us, (651) 266-8835.

Sincerely,

Monica Shaffer
Monica Shaffer
Assistant City Attorney
License No.: 0504708

Cc: Khang Chang, 3111 N. 4th St., Minneapolis, MN 55411
Hillcrest Center LLC, 375 Jackson St. Suite 700W, St. Paul, MN 55101-1810
Caty Royce and Tia Williams, Co-Executive Directors, 501 Dale Street N, Saint Paul, MN 55104

OFFICE OF THE CITY ATTORNEY
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Civil Division, 15 Kellogg Blvd. West, 400 City Hall
Saint Paul, MN 55102
Tel: 651-266-8755 | Fax: 651-298-5619

Attachments:

- Notice of License Revocation from the Minnesota Dept. of Revenue – 09/15/2025
- Letter from Department re: Minnesota Revenue Notice of License Revocation – 09/19/2025
- Note to File by Eric Hudak – 10/20/2025
- Minnesota Statute § 270C.72

DEPARTMENT OF REVENUE

September 15, 2025

ID: XX-XXX4037
Letter ID: L0279659872

#BWBBMRR
#0000 0027 9659 8726#
ST. PAUL, CITY OF
ST PAUL DSI
375 JACKSON ST #220
ST PAUL MN 55101-1806

Received

SEP [illegible] 2025

City of Saint Paul - DSI

Notice of License Revocation

Please revoke the following license for the Minnesota Department of Revenue.

Debtor name:	WHITE DRAGON CATERING, INC.
Debtor ID:	XX-XXX4037
License holder:	White Dragon Catering Inc
License number:	75259
License expiration:	April 29, 2026
License type:	On Sale including Sunday - City

What do I need to do?

Within 10 days, notify the license holder by certified mail that their license may be revoked. Include a copy of this notice. On page 2, we state what the license holder must do to receive clearance.

Within 30 days, you must revoke the license unless you receive a clearance certificate from us.

Contact information

Collection Division
Phone: 651-556-3003 or 1-800-657-3909 (toll-free)
Email: mdor.collection@state.mn.us
Fax: 651-556-5116

STATE OF MINNESOTA
Commissioner of Revenue

by: [signature]

This is sent according to Minnesota Statute 270C.72, subdivision 1(b).

The following information is for the license holder

What must I do to get my license back?

Pay the amount due with secure funds. Contact the Minnesota Department of Revenue to get an updated amount.

How do I make a payment?

The following are considered secured funds: certified checks, cashier's checks, bank wires, money orders, cash, and credit card payments initiated through a collection officer.

Note: If you pay by certified check, cashier's check, money order, or cash, you must bring the payment to the Minnesota Department of Revenue, located at 600 North Robert Street, St. Paul, MN 55101. For bank wire transfers or credit card payments, call the Collection Division for assistance.

Contact information

Collection Division
Phone: 651-556-3003 or 1-800-657-3909 (toll-free)
Email: mdor.collection@state.mn.us
Fax: 651-556-5116

SAINT PAUL
SAFETY & INSPECTIONS

DEPARTMENT OF SAFETY & INSPECTIONS (DSI)
ANGIE WIESE, INTERIM DIRECTOR

375 Jackson Street, Suite 220
Saint Paul, MN 55101-1806
Tel: 651-266-8989 | Fax: 651-266-9124

September 19, 2025

White Dragon Catering Inc.
White Dragon Hall LLC.
1600 White Bear Ave N.
St. Paul, MN 55106

RE: MINNESOTA REVENUE NOTICE OF LICENSE REVOCATION

Messrs. Khang Chang and Long Yang,

Enclosed you will find a Notice of License Revocation ("Notice") issued by the Minnesota Department of Revenue ("Department") requiring the City of Saint Paul ("City") to notify you that the City may be required to revoke all licenses issued to White Dragon Catering LLC unless the City receives a clearance certificate from the Department within 30 days.

The Notice provides instructions that you must follow for the Department to issue a clearance certificate. Failure to comply with the instructions within 30 days will result in a recommendation to the City Attorney's Office to revoke all licenses issued to White Dragon Catering LLC.

Questions regarding this letter can be directed to me at (651) 266-9132.

Eric Hudak
Licensing Manager, Department of Safety and Inspections

cc: Monica Shaffer, Saint Paul City Attorney's Office
Sgt. Charles Graupman, Saint Paul Police Department
Khang Chang 2111 N. 4th St. Minneapolis, MN 55411
Long Yang 2111 N. 4th St. Minneapolis, MN 55411
E-mailed to Long Yang @ lyang1975@aol.com on September 19, 2025

375 Jackson Street, Suite 220
Saint Paul, MN 55101-1806

CITY OF SAINT PAUL
DEPARTMENT OF SAFETY AND INSPECTIONS

SAINT PAUL

Khang Chang and Long Yang
2111 N. 4th St.
Minneapolis, MN
55411

UNITED STATES POSTAL SERVICE.

SAINT PAUL
101 5TH ST E STE 150
SAINT PAUL, MN 55101-9909
www.usps.com

09/19/2025 03:11 PM

TRACKING NUMBERS
9589 0710 5270 3022 6819 95

TRACK STATUS OF ITEMS WITH THIS CODE
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TRACK STATUS ONLINE
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PURCHASE DETAILS

Product	Qty	Unit Price	Price
First-Class Mail® Letter	1		$1.36
Saint Paul, MN 55106 Weight: 0 lb 2.50 oz Estimated Delivery Date Mon 09/22/2025			
Certified Mail® Tracking #: 9589 0710 5270 3022 6819 95			$5.30
Total			$6.66

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- ☐ Return Receipt (hardcopy) $
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- ☐ Certified Mail Restricted Delivery $
- ☐ Adult Signature Required $
- ☐ Adult Signature Restricted Delivery $

Postage
$
Total Postage and Fees
$

Postmark
Here

Sent To WHITE DRAGON HALL LLC
Street and Apt. No., or PO Box No. 1660 WHITE BEAR AVE.
City, State, ZIP+4® SAINT PAUL MN 55106

9589 0710 5270

SAINT PAUL
SAFETY & INSPECTIONS

DEPARTMENT OF SAFETY & INSPECTIONS (DSI)
ANGIE WIESE, PE(MN), CBO, DIRECTOR

375 Jackson Street, Suite 220
Saint Paul, MN 55101-1806
Tel: 651-266-8989 | Fax: 651-266-9124

October 20, 2025

Note to File by Eric Hudak, DSI Licensing Manager

Re: MN Revenue Notice of License Revocation for White Dragon Hall, 1600 WBA
Letter ID: L0279659872

MN Revenue representative Jennifer (No last name) at (651) 556-3717 advised me via phone conversation that no clearance certificate has been issued to White Dragon.

270C.72 TAX CLEARANCE; ISSUANCE OF LICENSES.

Subdivision 1. **Tax clearance required.** (a) The state or a political subdivision of the state may not issue, transfer, or renew, and must revoke, a license for the conduct of a profession, occupation, trade, or business, if the commissioner notifies the licensing authority that the applicant owes the state delinquent taxes payable to the commissioner, penalties, or interest. The commissioner may not notify the licensing authority unless the applicant taxpayer owes $500 or more in delinquent taxes, penalties, or interest, or has not filed returns. If the applicant taxpayer does not owe delinquent taxes, penalties, or interest, but has not filed returns, the commissioner may not notify the licensing authority unless the taxpayer has been given 90 days' written notice to file the returns or show that the returns are not required to be filed.

(b) Within ten days after receipt of the notification from the commissioner under paragraph (a), the licensing authority must notify the license holder by certified mail of the potential revocation of the license for the applicable reason under paragraph (a). The notice must include a copy of the commissioner's notice to the licensing agency and information, in the form specified by the commissioner, on the licensee's option for receiving a tax clearance from the commissioner. The licensing authority must revoke the license 30 days after receiving the notice from the commissioner, unless it receives a tax clearance from the commissioner as provided in paragraph (c).

(c) A licensing authority that has received a notice from the commissioner may issue, transfer, renew, or not revoke the applicant's license only if (1) the commissioner issues a tax clearance certificate and (2) the commissioner or the applicant forwards a copy of the clearance to the authority. The commissioner may issue a clearance certificate only if the applicant does not owe the state any uncontested delinquent taxes, penalties, or interest and has filed all required returns.

Subd. 2. **Definitions.** For purposes of this section, the following terms have the meanings given.

(a) "Delinquent taxes" do not include a tax liability if (i) an administrative or court action which contests the amount or validity of the liability has been filed or served, (ii) the appeal period to contest the tax liability has not expired, or (iii) the applicant has entered into a payment agreement and is current with the payments.

(b) "Applicant" means an individual, if the license is issued to or in the name of an individual, or the corporation or partnership, if the license is issued to or in the name of a corporation or partnership. "Applicant" also means an officer of a corporation, a member of a partnership, or an individual who is liable for delinquent taxes, either for the entity for which the license is at issue or for another entity for which the liability was incurred, or personally as a licensee. In the case of a license transfer, "applicant" also means both the transferor and the transferee of the license. "Applicant" also means any holder of a license.

(c) "License" means any permit, registration, certification, or other form of approval authorized by statute or rule to be issued by the state or a political subdivision of the state as a condition of doing business or conducting a trade, profession, or occupation in Minnesota, specifically including, but not limited to, a contract for space rental at the Minnesota State Fair and authorization to operate concessions or rides at county and local fairs, festivals, or events.

(d) "Licensing authority" includes the Minnesota State Fair Board and county and local boards or governing bodies.

Subd. 3. **Notice and hearing.** (a) Prior to notifying a licensing authority pursuant to subdivision 1 to revoke a license, the commissioner must send a notice to the applicant of the commissioner's intent to require revocation of the license and of the applicant's right to a hearing. If the applicant requests a hearing in writing within 30 days of the date of the notice, a contested case hearing must be held. The hearing must be held within 45 days of the date the commissioner refers the case to the Office of Administrative Hearings. Notwithstanding any law to the contrary, the applicant must be served with 20 days' notice in writing specifying the time and place of the hearing and the allegations against the applicant. The notice may be served personally or by mail. A license is subject to revocation when 30 days have passed following the date of the notice in this paragraph without the applicant requesting a hearing, or, if a hearing is timely requested, upon final determination of the hearing under section 14.62, subdivision 1.

(b) The commissioner may notify a licensing authority under subdivision 1 only after the requirements of paragraph (a) have been satisfied.

(c) A hearing under this subdivision is in lieu of any other hearing or proceeding provided by law arising from any action taken under subdivision 1.

Subd. 4. **Licensing authority; duties.** All licensing authorities must require the applicant to provide the applicant's Social Security number or individual taxpayer identification number and Minnesota business identification number, as applicable, on all license applications. Upon request of the commissioner, the licensing authority must provide the commissioner with a list of all applicants, including the name, address, business name and address, and Social Security number or individual taxpayer identification number and business identification number, as applicable, of each applicant. The commissioner may request from a licensing authority a list of the applicants no more than once each calendar year.

History: *2005 c 151 art 1 s 87; 2014 c 308 art 8 s 3,4; 1Sp2017 c 1 art 16 s 11*

White Dragon NOV Packet 10.22.2025

Final Audit Report 2025-10-22

Created:	2025-10-22
By:	Megan Marcouiller (Megan.Marcouiller@ci.stpaul.mn.us)
Status:	Signed
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"White Dragon NOV Packet 10.22.2025" History

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