

STATE OF MINNESOTA)
) ss.

AFFIDAVIT OF SERVICE BY U.S. MAIL

COUNTY OF RAMSEY)

Riddhi Mistry, being first duly sworn, deposes and says that on the sixteenth day of December she served the attached **NOTICE OF VIOLATION AND REQUEST FOR IMPOSITION OF 10-DAY LICENSE SUSPENSION** and a correct copy thereof in an envelope addressed as follows:

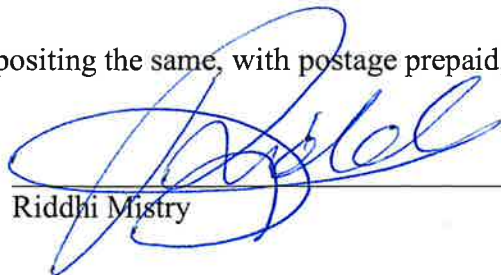
Club Milton LLC
d/b/a Club Milton
334 Milton Street North
Saint Paul, MN 55104
Attn: Terrell Charles

Terrell Charles
334 Milton Street North
Saint Paul, MN 55104

Pioneer Lodge No 1 F And A M
334 Milton Street North
Saint Paul, MN 55104-5422

Summit University Planning Council
375 Selby Avenue #9
Saint Paul, MN 55102
Attn: Executive Director, Jens Warner

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


Riddhi Mistry

Subscribed and sworn to before me
This 16th day of December 2025


Notary Public





December 16, 2025

**NOTICE OF VIOLATION AND
REQUEST FOR IMPOSITION OF 10-DAY LICENSE SUSPENSION**

Club Milton INC
d/b/a Club Milton
334 Milton Street North
Saint Paul, MN 55104

Attn: Terrell Charles

RE: Liquor On Sale-Club under 200 Mbrs – A & Liquor On Sale-Sunday license held by Club Milton INC d/b/a Club Milton for the premises located at 334 Milton Street North in Saint Paul.
License ID # 0097716

Dear Licensee:

The Department of Safety and Inspections ("Department") has recommended adverse action against the Liquor On Sale-Club under 200 Mbrs – A & Liquor On Sale-Sunday license held by Club Milton LLC d/b/a Club Milton ("Licensee") located at 334 Milton Street North ("Licensed Premises").

Legal Basis for Action:

Saint Paul Legislative Code § 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 Legislative Code § 310.02(2)(a)(1) explains uniform procedures for applications to grant or issue a license:



"Form. All applicants for a Class N License issued pursuant to these chapters will make both original and renewal applications to the director on such forms as are provided by the department. Such applications will not be received by the director until the director deems the application meets the substantially complete criteria. Subsequently, issuance of a license cannot occur until insurance policies, bonds, deposits, sureties, and indemnifications or certificates required by these chapters, together with the certification required in paragraph 2 below are received and approved."

Saint Paul Legislative Code § 310.02(2)(e)(3) explains uniform procedures for revocation or suspension after application:

"Revocation or suspension. If the director determines that the application for renewal does not meet all of the requirements of law or that there exist grounds for revocation or suspension of a Class N License, the director must follow the hearing procedures as outlined in Saint Paul Legislative Code Section 310.03."

Saint Paul Legislative Code § 310.03(m)(2)(12) states the tobacco presumptive penalty for Intoxicating and nonintoxicating malt liquor violations:

Type of Violation	1 st	2 nd	3 rd	4 th
(12) Failure to comply with statutory, and ordinance requirements for liability insurance.	10-day suspension	Revocation	N/A	N/A

Minnesota Statutes § 340A.409, subd. 1, explains the insurance requirement:

"(a) No retail license may be issued, maintained or renewed unless the applicant demonstrates proof of financial responsibility with regard to liability imposed by section 340A.801. The issuing authority must submit to the commissioner the applicant's proof of financial responsibility. This subdivision does not prohibit a local unit of government from requiring higher insurance or bond coverages, or a larger deposit of cash or securities. The minimum requirement for proof of financial responsibility may be given by filing:



(1) a certificate that there is in effect for the license period an insurance policy issued by an insurer required to be licensed under section 60A.07, subdivision 4, or by an insurer recognized as an eligible surplus lines carrier pursuant to section 60A.206 or pool providing at least \$50,000 of coverage because of bodily injury to any one person in any one occurrence, \$100,000 because of bodily injury to two or more persons in any one occurrence, \$10,000 because of injury to or destruction of property of others in any one occurrence, \$50,000 for loss of means of support of any one person in any one occurrence, \$100,000 for loss of means of support of two or more persons in any one occurrence, \$50,000 for other pecuniary loss of any one person in any one occurrence, and \$100,000 for other pecuniary loss of two or more persons in any one occurrence."

Factual Basis for Imposition of 10-day license suspension penalty:

Between November 26, 2025, and December 9, 2025, several emails were exchanged between Department Inspector Tom Ferrera, Licensing Specialist Jessica Henry, Insurance Agent Brad Welle, and Licensee. These emails were sent regarding the liquor liability insurance lapse that took place on your license from July 1, 2025, to July 9, 2025. A request was made by Mr. Welle to the Department to renew the license. Mr. Welle asserted that the lapse in insurance was due to a family emergency delaying the Club Milton board meeting that was necessary for approval of the liquor liability renewed coverage. Despite the insurance lapse between July 1, 2025, to July 9, 2025, the Alcohol and Gambling Enforcement Division (AGED) approved renewal of your license. Nonetheless, the Saint Paul Legislative Code requires penalties to be imposed for the violation since you failed to cover the lapse in coverage.

Adverse Action Recommendation:

The Department will recommend a 10-day suspension of your license, as prescribed by Saint Paul Legislative Code § 310.03(m)(2)(12), for violations of Saint Paul Legislative Code §§ 310.02(a)(1), 310.02(e)(3), and Minnesota Statutes § 340A.409, subd. 1.

You have three (3) options to proceed:

1. You can accept the penalty. If this is your choice, you should indicate it directly to the Department of Safety and Inspections at 375 Jackson Street, Ste. 220, St. Paul, Minnesota 55101-1806 no later than **December 26, 2025**. A self-addressed envelope is enclosed for your convenience. Acceptance of the



penalty will be considered an admission to the violation and waiver of the hearing to which you are entitled. This matter will then be placed on the City Council consent agenda for imposition of the recommended penalty of a 10-day suspension.

2. If you wish to admit the facts but you contest the penalty, you may have a public hearing before the City Council. You will need to send me a letter with a statement admitting to the facts and requesting a public hearing. I will need to receive your letter by **December 26, 2025**. The matter will then be scheduled before the City Council to determine whether to impose the 10-day suspension. You will have an opportunity to appear before the Council and make a statement on your own behalf.
3. If you dispute the facts 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 **December 26, 2025**. At that hearing both you and the City will appear and present witnesses and evidence and will cross-examine each other's witnesses. After receipt of the ALJ's report and recommendation (usually within 90 days), a public hearing before the City Council 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.

Please note: If you choose an administrative hearing, the Department reserves the right to request that City Council impose the costs of the administrative hearing per Saint Paul Legislative Code § 310.03(k).

If you have not contacted me by December 26, 2025, I will assume that you do not contest the imposition of the proposed adverse action of a ten (10) day suspension of your license. In that case, the matter will be placed on the City Council consent agenda for approval of the recommended penalty.

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

Sincerely,

Monica Shaffer
Assistant City Attorney
License No.: 0504708



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: 651-266-8548 | Fax: 651-298-5619

Cc: Terrell Charles, 334 Milton Street North, Saint Paul, MN 55104
Pioneer Lodge No 1 F And A M, 334 Milton Street North, Saint Paul, MN 55104-5422
Executive Director, Jens Warner, Summit University Planning Council, 375 Selby Avenue #9, Saint Paul, MN 55102

Attachments: Email Chain – 11/26/2025-12/09/2025
Saint Paul Legislative Code § 310.01
Saint Paul Legislative Code § 310.02(2)(a)(1)
Saint Paul Legislative Code § 310.02(2)(e)(3)
Saint Paul Legislative Code § 310.03(m)(2)(12)
Minnesota Statutes § 340A.409, subd. 1.

Email Chain One (1) – From Insurance Company & A&GE

Joseph Voyda

From: Tom Ferrara
Sent: Tuesday, December 2, 2025 12:57 PM
To: Anderson, Allison (DPS)
Subject: FW: Pioneer Lodge #1 F & A.M. (Club Milton Inc) 334 N Milton
Attachments: RE: [REDACTED]

Follow Up Flag: Follow up
Flag Status: Flagged

Sorry to bother Allison, we seemingly have a rash of insurance lapses with the forwarded Club Milton Inc below and attached reply to Jessica yesterday regarding [REDACTED] amongst those seeking next steps. Ordinance calls for a ten-day suspension if a lapse and more penalties depending upon the circumstances but looking for your standard procedure to reinstate a license if there is a lapse so I can include in my messaging to establishments and their agents. Both agents' initial replies to the establishments reportedly were that they cannot do anything for the lapse periods. Any advisement you can/willing to provide...?

Thank You!

Tom

Thomas Ferrara
Inspector, Business Licensing
Department of Safety and Inspections (DSI)
375 Jackson Street, Suite 220
Saint Paul, MN 55101-1806
Tel: 651-266-9087 & Fax: 651-266-9124
Information & Complaints 651-266-8989
www.StPaul.gov



SAINT PAUL
MINNESOTA

From: *CI-StPaul_DSIWeb <DSIWeb@ci.stpaul.mn.us>
Sent: Wednesday, November 26, 2025 10:03 AM
To: #CI-StPaul_DSI-Licensing <DSI-Licensing@ci.stpaul.mn.us>
Cc: Stephanie Harrington <stephanie.harrington@ci.stpaul.mn.us>; Lee Vang <lee.vang@ci.stpaul.mn.us>; Sareen Earm <Sareen.Earm@ci.stpaul.mn.us>
Subject: RE: Pioneer Lodge #1 F & A.M. (Club Milton Inc) 334 N Milton

Good morning,

Please also refer to their VM attached.

Thank you,
Sareen E.

From: *CI-StPaul_DSIWeb
Sent: Wednesday, November 26, 2025 9:32 AM
To: #CI-StPaul_DSI-Licensing <DSI-Licensing@ci.stpaul.mn.us>
Subject: FW: Pioneer Lodge #1 F & A.M. (Club Milton Inc) 334 N Milton

Good morning,

Please see below email regarding their liquor liability insurance requirement for their liquor license renewal.

Thank you,
Sareen E.

From: Brad Welle <bwelle@associatedinscounselors.com>
Sent: Wednesday, November 26, 2025 9:27 AM
To: *CI-StPaul_DSIWeb <DSIWeb@ci.stpaul.mn.us>
Cc: Kantrell Bland <kantrellbland@gmail.com>
Subject: Pioneer Lodge #1 F & A.M. (Club Milton Inc) 334 N Milton

To Whom It May Concern,

My name is Brad Welle. I am the insurance agent for Pioneer Lodge # 1 F & A.M. (Club Milton Inc).

I am emailing requesting your consideration for the City of St Paul review circumstances below and allow liquor liability license to be renewed.

- ✓ Pioneer Lodge has been a client in good standing of Associated Insurance Counselors for many, many years. My records indicate we have renewed the Liquor Liability for Club Milton without a lapse in coverage back to 7/1/2004.
- ✓ My understanding the reason for coverage lapse (Liquor Policy issued 7/9/25 to 7/1/26) was due a family emergency delaying Club Milton board meeting to approve Liquor Liability coverage to be renewed.

Please contact me if you have any questions or if any additional information would be helpful.

Thank you for your time and consideration with this matter.
Brad

Brad J Welle CIC CRM CPIA
Owner/Producer

Associated Insurance Counselors
1646 East County Road E, White Bear Lake, MN 55110
Office (651) 770-0343 <> Fax (651) 773-4060 <> Cell (651) 271-7065
Email: bwelle@associatedinscounselors.com

Email Chain One (1) – With A&GE

Joseph Voyda

From: Tom Ferrara
Sent: Tuesday, December 9, 2025 12:35 PM
To: Henry, Jessica (DPS)
Cc: Eric Hudak
Subject: FW: Club Milton Inc 334 Milton St N RE: [REDACTED]
Attachments: 20251204174715724.pdf; FW: Pioneer Lodge #1 F & A.M. (Club Milton Inc) 334 N Milton

Hello Jessica,

Simply making sure we are good with Club Milton Inc at 334 Milton St N. I was preparing to create and send a renewed City license yet noticed the State license was still indicating expired on the website. Anything else needed of the establishment for your renewal? After sending the new license I expect to then initiate the adverse licensing action later today. Copying Eric so he is up-to-date because I will be out for a few days.

Thank You

Thomas Ferrara
Inspector, Business Licensing
Department of Safety and Inspections (DSI)
375 Jackson Street, Suite 220
Saint Paul, MN 55101-1806
Tel: 651-266-9087 & Fax: 651-266-9124
Information & Complaints 651-266-8989
www.StPaul.gov



SAINT PAUL
MINNESOTA

From: Tom Ferrara <tom.ferrara@ci.stpaul.mn.us>
Sent: Thursday, December 4, 2025 5:46 PM
To: Henry, Jessica (DPS) <Jessica.Henry@state.mn.us>
Cc: Eric Hudak <Eric.Hudak@ci.stpaul.mn.us>; Anderson, Allison (DPS) <Allison.Anderson@state.mn.us>
Subject: Club Milton Inc 334 Milton St N RE: [REDACTED]

Much thanks for action on these Jessica and today's confirmation Allison! After our discussion Allison I sent an email onto establishment's Kantrell Bland <kantrellbland@gmail.com> informing AGED will accept the renewal and allow the establishment to reactivate/renew its licenses despite the 7/1/25-7/9/25 lapse. It was furthered that after operations resume the adverse action process against the City license for the ordinance/insurance violation will be initiated with a penalty to be imposed at a later date. Thanks again and let me know if missed anything or if questions...
Tom

Thomas Ferrara
Inspector, Business Licensing
Department of Safety and Inspections (DSI)
375 Jackson Street, Suite 220
Saint Paul, MN 55101-1806
Tel: 651-266-9087 & Fax: 651-266-9124
Information & Complaints 651-266-8989



**SAINT PAUL
MINNESOTA**

From: Henry, Jessica (DPS) <Jessica.Henry@state.mn.us>
Sent: Wednesday, December 3, 2025 8:50 AM
To: Tom Ferrara <tom.ferrara@ci.stpaul.mn.us>
Cc: Eric Hudak <Eric.Hudak@ci.stpaul.mn.us>; Anderson, Allison (DPS) <Allison.Anderson@state.mn.us>
Subject: [REDACTED]

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

Hi Tom,

I will get their license updated this morning to current. No need to send any new paperwork. I will keep the paperwork we received, and print off this email chain for our records.

They called me this morning to inquire about it. I let them know that I will get them up to current and active again.

I'll let Allison give her input regarding Club Milton, but my two cents – if it's a similar thing, I suggest we proceed with the same remedy.

Let me know if you need anything else from me.

Thanks,

Jessica Henry

Licensing Specialist | MN DPS Alcohol and Gambling Enforcement

Department of Public Safety

445 Minnesota St. | Suite 1600

St. Paul, MN 55101

O: 651-201-7513 | F: 651-297-5259

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From: Tom Ferrara <tom.ferrara@ci.stpaul.mn.us>
Sent: Tuesday, December 2, 2025 5:17 PM
To: Henry, Jessica (DPS) <Jessica.Henry@state.mn.us>

Cc: Eric Hudak <Eric.Hudak@ci.stpaul.mn.us>; Anderson, Allison (DPS) <Allison.Anderson@state.mn.us>

Subject: RE: [REDACTED]

Much thanks for reply, Jessica, I hope you are working remote and not responding on a day off! The [REDACTED] licensee was here before and after the visit there and between whomever greeted them at your offices and my discussions they indicated it was clear that the insurance agent's/carrier's inability to remedy the [REDACTED] lapse is the problem not the State or the City. Yes, we concur here that if you plan to update the State license to align with the new insurance carrier's [REDACTED] to [REDACTED] license period and allow for them to resume operations ASAP we will do the same then initiate ordinance's adverse action process for the lapse. Per code that penalty typically begins with a ten-day suspension and potentially additional fines depending upon the circumstances that will be imposed after this renewal processed. Please let us know if that is the plan and if you wish for me to send a modified ONSS renewal form with a note on it...

Copying Allison as I contacted her earlier today on a similar 7/1/25-7/9/25 lapse with Club Milton Inc at 334 Milton St N and wondering if the same remedy should be applied...

Thanks to both of you!

Tom

Thomas Ferrara
Inspector, Business Licensing
Department of Safety and Inspections (DSI)
375 Jackson Street, Suite 220
Saint Paul, MN 55101-1806
Tel: 651-266-9087 & Fax: 651-266-9124
Information & Complaints 651-266-8989
www.StPaul.gov



SAINT PAUL
MINNESOTA

From: Henry, Jessica (DPS) <Jessica.Henry@state.mn.us>

Sent: Tuesday, December 2, 2025 2:53 PM

To: Tom Ferrara <tom.ferrara@ci.stpaul.mn.us>

Subject: RE: [REDACTED]

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

Hi Tom,

I'm not in the office today, but [REDACTED] stopped by inquiring about their liquor license. They told my coworker that they can't get coverage for their insurance. In the past, in similar situations, if the lapse of coverage is in the past, and they can't get retroactive coverage, we just update their license to get to current, and the city can choose to fine them for the lapse in coverage. I know you mentioned you may be penalizing them. Should I hold off on updating their license until you fine them, or (assuming they really can't get coverage), are you ok if I update their license to current now?

Thanks for any input you have!

Jessica Henry

Licensing Specialist | MN DPS Alcohol and Gambling Enforcement

Department of Public Safety

445 Minnesota St. | Suite 1600

St. Paul, MN 55101

O: 651-201-7513 | F: 651-297-5259

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From: Tom Ferrara <tom.ferrara@ci.stpaul.mn.us>

Sent: Monday, December 1, 2025 1:13 PM

To: Henry, Jessica (DPS) <Jessica.Henry@state.mn.us>

Subject: RE: [REDACTED]

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Thanks for update Jessica, I will inform the licensee. I was out the week this was handled and a post-it note was also left for me on matter so expected to connect with you at some point. The licensee reportedly informed a coworker that the insurance agent could not do so yet I will follow up. If that is accurate, anything else I can advise? I expect we have an adverse action for a penalty being assembled for the lapse also.

Thomas Ferrara

Inspector, Business Licensing

Department of Safety and Inspections (DSI)

375 Jackson Street, Suite 220

Saint Paul, MN 55101-1806

Tel: 651-266-9087 & Fax: 651-266-9124

Information & Complaints 651-266-8989

www.StPaul.gov



**SAINT PAUL
MINNESOTA**

From: Henry, Jessica (DPS) <Jessica.Henry@state.mn.us>

Sent: Monday, December 1, 2025 11:03 AM

To: Tom Ferrara <tom.ferrara@ci.stpaul.mn.us>

Subject: [REDACTED]

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

Hi Tom,

I just wanted to make sure we are on the same page for this. I see the note on [REDACTED] liquor license renewal that there is a gap in their insurance. I am not going to update their liquor license until we, hopefully, receive an updated insurance covering that gap in insurance.

Keep me updated on their insurance. Thanks!

Jessica Henry

Licensing Specialist | MN DPS Alcohol and Gambling Enforcement

Department of Public Safety

445 Minnesota St. | Suite 1600

St. Paul, MN 55101

O: 651-201-7513 | F: 651-297-5259

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Ordinance Violations

Chapter 409. Intoxicating Liquor

Sec. 409.065. Insurance requirements.

No license under this chapter may be issued, maintained or renewed unless the licensee or applicant therefor complies with the insurance requirements imposed by Minn. Stat. § 340A.409. Such insurance coverage must comply with the requirements of Minn. Stat. § 340A.409 and Chapters 7 and 8 of this Legislative Code.

Chapter 310. Uniform License Procedures

Sec. 310.02. Uniform procedures for application for the grant or issuance of the license, new application investigation and review, application denial, notice, levels of approval, objections and renewal procedures by license type.

2) *Class N Licenses.*

(a) *Application.*

1. *Form.* All applicants for a Class N License issued pursuant to these chapters will make both original and renewal applications to the director on such forms as are provided by the department. Such applications will not be received by the director until the director deems the application meets the substantially complete criteria. Subsequently, issuance of a license cannot occur until insurance policies, bonds, deposits, sureties, and indemnifications or certificates required by these chapters, together with the certification required in paragraph 2 below are received and approved.

(e) *Levels of Approval.*

3. *Revocation or suspension.* If the director determines that the application for renewal does not meet all of the requirements of law or that there exist grounds for revocation or suspension of a Class N License, the director must follow the hearing procedures as outlined in Saint Paul Legislative Code Section 310.03.

Sec. 310.03. Hearing procedures.

- (m) *Presumptive penalties for certain violations.* The purpose of this section is to establish a standard by which the city council determines the amount of fines, the length of license suspensions and the propriety of revocations, the general presumptive penalty matrix applies to all license types, except that in the case of a violation involving a liquor license the penalty matrix for intoxicating liquor; nonintoxicating malt liquor applies and for a violations involving tobacco, the penalty matrix for tobacco applies. These penalties are presumed to be appropriate for every case; however the council may deviate therefrom in an individual case where the council finds and determines that there exist substantial and compelling reasons making it more appropriate to do so. When deviating from these standards, the council must provide written reasons that specify why the penalty selected was more appropriate.

2. Intoxicating liquor; malt liquor; presumptive penalty matrix.

Presumptive penalties for intoxicating liquor and nonintoxicating malt liquor violations. If a violation is not covered under this penalty matrix, the general presumptive penalty matrix should be used. Penalties for convictions or violations are presumed to be appropriate for every case; however, the council may deviate therefrom in an individual case where the council finds and determines that there exist substantial and compelling reasons making it more appropriate to do so. When deviating from these standards, the council must provide written reasons that specify why the penalty selected was more appropriate (unless specified, numbers below indicate consecutive days' suspension):

Type of Violation	Appearance			
	1st	2nd	3rd	4th
(12) Failure to comply with statutory, and ordinance requirements for liability insurance.	10-day suspension	Revocation	NA	NA

Minnesota State Statutes

340A.409 Liability Insurance.

Subdivision 1. **Insurance required.** (a) No retail license may be issued, maintained or renewed unless the applicant demonstrates proof of financial responsibility with regard to liability imposed by section [340A.801](#). The issuing authority must submit to the commissioner the applicant's proof of financial responsibility. This subdivision does not prohibit a local unit of government from requiring higher insurance or bond coverages, or a larger deposit of cash or securities. The minimum requirement for proof of financial responsibility may be given by filing:

(1) a certificate that there is in effect for the license period an insurance policy issued by an insurer required to be licensed under section [60A.07, subdivision 4](#), or by an insurer recognized as an eligible surplus lines carrier pursuant to section [60A.206](#) or pool providing at least \$50,000 of coverage because of bodily injury to any one person in any one occurrence, \$100,000 because of bodily injury to two or more persons in any one occurrence, \$10,000 because of injury to or destruction of property of others in any one occurrence, \$50,000 for loss of means of support of any one person in any one occurrence, \$100,000 for loss of means of support of two or more persons in any one occurrence, \$50,000 for other pecuniary loss of any one person in any one occurrence, and \$100,000 for other pecuniary loss of two or more persons in any one occurrence;