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**HENNEPIN COUNTY ATTORNEY**  
**MICHAEL O FREEMAN**

September 15, 2022

UB Liquors, LLC d/b/a Merwin Liquors  
Attn: Thomas Conen  
700 West Broadway Avenue  
Minneapolis, MN 55411

700 West Broadway, LLC  
Attn: Stuart Tapper  
700 West Broadway Avenue  
Minneapolis, MN 55411

**Re: Investigation of Merwin Liquors and 700 West Broadway for Potential Violations of Minnesota Law**

Dear Mr. Conen and Mr. Tapper:

This letter is to inform you that the Office of the Minnesota Attorney General (“AGO”) is investigating UB Liquors, LLC d/b/a Merwin Liquors and 700 West Broadway, LLC (collectively “Merwin”) for potential violations of Minnesota law, including Merwin’s role in maintaining a public nuisance. I ask that you respond to the informal requests listed below by no later than September 22, 2022.

Information provided to the AGO, as well as publicly available reports, indicate that Merwin is maintaining a public nuisance by perpetuating conditions that unreasonably endanger the health and safety of a considerable number of members of the public. Further, the AGO has received information that Merwin permits gambling and gambling-related activity on its premises. Numerous sources of information indicate that Merwin has been the site of repeated unlawful use, sale, possession, storage, and delivery of controlled substances, as well as the site of repeated unlawful use or possession of dangerous weapons. Further, it appears that Merwin has been aware of the dangerous impact its conduct and others’ conduct on its premises is inflicting upon the public, but Merwin has taken little or no corrective action to abate the situation.

In order to facilitate the AGO’s investigation of Merwin’s potential violations of Minnesota law, I ask that you provide the following information:

1. Provide copies of all complaints made to you since January 1, 2021 regarding any unlawful activity occurring in your business or the parking lot in front of your business at 700 West Broadway Avenue;

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2. Provide copies of all enforcement actions, administrative actions, notices of regulatory violations, and any other legal action taken against Merwin by any local, county, state, or federal government entity since January 1, 2021, as well as all documents and information you provided to any such entity;
3. Provide copies of all internal communications Merwin has sent to staff at its 700 West Broadway Avenue location since January 1, 2021 that relate in any way to staff safety or staff security measures;
4. Provide copies of all agreements, including but not limited to, leases executed between UB Liquors, LLC d/b/a Merwin Liquors and 700 West Broadway, LLC related to the property located at 700 West Broadway Avenue; and
5. Identify all steps Merwin has taken since January 1, 2021 to abate any unlawful activity occurring in your business or the parking lot in front of your business at 700 West Broadway Avenue, and provide copies of any relevant abatement plan created or held by Merwin.

Please provide your responses no later than September 22, 2022 to:

Office of Minnesota Attorney General  
Attn: James W. Canaday, Deputy Attorney General  
445 Minnesota Street, Suite 1400  
Saint Paul, MN 55101  
james.canaday@ag.state.mn.us  
(651) 757-1421

Finally, I note that this letter is not the notice required by Minnesota Statutes section 617.81, subdivision 4, but is instead an informal, expedited request to further the AGO's on-going investigation of Merwin.

Sincerely,



Keith Ellison  
Attorney General



Michael O. Freeman  
Hennepin County Attorney