

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT, IN AND FOR MIAMI-
DADE COUNTY, FLORIDA

CASE NO.

CITY OF NORTH MIAMI,
a Florida municipality,

Plaintiff

v.

NORTH MIAMI CLEANERS, INC. d/b/a
SPOTMASTERS, a Florida corporation,

Defendant.

COMPLAINT FOR INJUNCTION AND DECLARATORY RELIEF

Plaintiff, City of North Miami (“City”), hereby files its complaint for injunction and declaratory relief against defendant, North Miami Cleaners, Inc. d/b/a Spotmasters (“Cleaners”), and in support, states as follows:

INTRODUCTION

1. This is an action for declaratory and injunctive relief to enjoin the Cleaners from unlawfully operating its cleaning facilities without a certificate of use (“CU”), without a business tax receipt (“BTR”), and for a use not permitted under the City’s zoning code.

PARTIES AND JURISDICTION

2. The City is a Florida municipal corporation located in Miami-Dade County.

3. The Cleaners is a Florida for-profit corporation with a business located within the City. The principal address of the business is 1290 N.E. 125th Street. It also uses the address 12450 N.E. 13th Avenue. The Cleaners operates cleaning facilities under the name of Spotmasters at this location and also owns the property and the facilities.

WEISS SEROTA HELFMAN COLE & BIERMAN, P.L.

4. The Court has jurisdiction pursuant to section 26.012, Florida Statutes and Chapter 86, Florida Statutes.

5. Venue is proper pursuant to Chapter 47, Florida Statutes because the parties and the property at issue are located in Miami-Dade County.

GENERAL ALLEGATIONS

Zoning of Subject Property

6. The Cleaners' property ("Property") is located within the C-3 zoning district (formerly C-2A). As such, a special exception permit was required for the Cleaners to operate a "dry cleaning establishment."

7. Pursuant to the Code, a "dry cleaning establishment" means "means any fully equipped steam laundry or dry cleaning and dyeing establishment wherein the actual processing of garments is done. A dry cleaning establishment shall also engage in collecting clothes from customers, over the counter, processing them, and returning them to the customers."

8. On June 10, 2008, the City Council approved an amended special exception permit that became effective on September 29, 2008 upon its recording by the Clerk of the Court ("Special Exception Permit"). The Special Exception Permit, a copy of which is attached as Exhibit "A," allows for the operation of a "dry cleaning establishment" on the Property.

9. In October 2009, the Cleaners applied for a rezoning of the Property from its commercial designation (then C-2A) to an industrial designation.

10. An M-1 industrial zoning designation allows a "dry cleaning plant" as a permitted use. The Code defines "a dry cleaning plant" to mean: "a facility in business to provide dry cleaning services, on a large scale, for offsite customers. A dry cleaning plant is an industrial operation, is not open to serve the general public, and is regulated by environmental

laws that require the safe disposal of contaminated solvents and wash water used in the cleaning process.”

11. The Cleaners application for rezoning was recommended for denial by the City’s Planning and Zoning Board, and the Cleaners abandoned the application.

Industrial use of the Property

12. In recent years, the Cleaners has operated as a “dry cleaning plant,” an industrial facility performing large scale linen laundry and dry-cleaning on the premises for off-site commercial and institutional customers.

13. Such use is beyond the scope of the dry cleaning establishment approved by special exception for this C-3 zoned property.

14. Beginning in the fall of 2013, nearby residents began registering complaints with the City regarding the level of noise (generated both by on-site operation of industrial cleaning machinery and by travel to and from the facility of large delivery vehicles), fumes and odors emanating from the facility, traffic concerns regarding the large delivery vehicles, and operation of the facility (with attendant deliveries) throughout the night.

15. At that time, the City urged the Cleaners to meet with residents to address their concerns. Within a year, however, the residents’ complaints to the City had only increased.

Certificate of Use: City Code Provisions

16. The Code at Chapter 29, Land Development Regulations, Section 3-212 (A), “Certificate of use required,” provides:

No structure, other than a single-family residence or duplex, shall be used or enlarged, or any new use made or enlarged of any land ... or structure, without first obtaining a certificate of use (CU) from the department of community planning and development. Said CU shall be required for each individual business ... located within the city. No person shall use or permit the use of any

structure and/or property hereafter created, erected, changed, converted, enlarged or moved, wholly or partly, until a CU reflecting the use, extent, location, transfer of ownership and other matters related to this section shall have been issued to the property owner....

(Emphasis added).

17. The Code at Chapter 29, Land Development Regulations, Section 3-212 (D), “Conformity with laws,” provides:

1. The certificate of use shall show that the use of a structure and/or property is in conformity with applicable city and Miami-Dade County (county) codes, as amended from time to time. It shall be the duty of the director of community planning and development or his/her designees (director) to issue a CU if the director finds that all applicable city and county requirements have been complied with as of the date of issuance, or to withhold a CU until such time the director finds that all applicable city and county requirements are satisfied.

2. In the event there is a question of as to the legality of a use, the director may require inspections, affidavits and such other information deemed appropriate or necessary to establish the legality of the use. Additionally, the city shall have the right to periodically inspect premises at any reasonable time to ensure the existence of a current and valid CU and to ensure compliance with applicable city and county laws, under which the CU was issued.

(Emphasis added).

18. The City Code at Chapter 29, Land Development Regulations, Section 3-212 (H), “Violations and enforcement,” provides:

1. If the director shall find that any of the provisions of this chapter or City Code are being violated, notification shall be made in writing to the owner of the property where the violation is occurring, indicating the nature of the violation and ordering action necessary to correct it.

2. If the violation continues, the director may initiate enforcement procedures pursuant to chapter 2, divisions 5.2 and 5.3 of the City Code. The director, in addition to other remedies, may also institute any appropriate civil action or proceedings in the circuit court for Miami-Dade County, to prevent any unlawful erection, construction, reconstruction, alternation, repair, conversion, maintenance or use, and to restrain, correct, or abate such violation, to prevent the occupancy of said structure, land or waterway, and to prevent any illegal act, conduct of business, or use in or about such premises.

3. Any person, firm or corporation violating or failing to comply with the requirements of this section may be deemed guilty of a misdemeanor and, upon conviction thereof, shall be punished by a fine not exceeding five hundred dollars (\$500.00) or imprisonment for a term not exceeding sixty (60) days, or both such fine and imprisonment at the discretion of the court.

(Emphasis added).

19. The City Code at Chapter 29, Land Development Regulations, Section 3-212(I),

“Nonrenewal and revocation of certificate of use,” in pertinent part provides:

1. The director is authorized to deny or revoke a CU for cause. The following constitute adequate grounds for the director to deny or revoke a CU:

* * *

d. The property owner, lessee, or sub-lessee is conducting a business which is not in compliance with a city or county code, state or federal law or regulation.

* * *

f. The property owner currently has existing liens on property or unpaid code enforcement fines and or penalties.

Zoning Violation Letter and Aftermath

20. On October 21, 2014, Nixon Lebrun, the City’s Zoning Administrator, Community Planning & Development Department, wrote a zoning violation letter to the Cleaners, a copy of which is attached as Exhibit “B” (“Zoning Violation Letter”).

21. The Zoning Administrator stated:

As you have been made aware already by Commander Donald Blanchard of the Code Enforcement Division through the various conversations, emails and meeting he has had with you, neighboring resident of the Windward condominium development have been filing nuisance complaints about your dry cleaning facility regarding the level of noise, fumes and odors that are emanating from the facility, as well as the improper hours of operations of same.

22. Continuing, the Zoning Administrator explained that the Special Exception Permit, issued in 2008, was made subject to the Cleaners abiding by the special exception criteria of the Code which, among other things, required “that the public health, safety, moral and general welfare [] not be adversely affected” by the use and that “necessary safeguards would be provided for the protection of surrounding properties, persons, and neighboring values.”

23. The Zoning Administrator then stated that the many documented nuisance complaints represent “a bona fide violation of the conditions of the Special Exception Permit, which may result in the revocation of same.” Continuing, he stated:

Furthermore, since the use of the property as a dry cleaning plant in the [C-3] commercial district is nonconforming, Article 6, Section 6-204 of the Land Development Regulations also provides for the discontinuation of a nonconforming use, should it produce odors, noxious fumes, smoke, noise or other external impacts that become a nuisance or hazard to residents.

24. There followed meetings with the Cleaners, but no resolution was reached and complaints by residents continued.

25. As a result, the City issued various civil citations to the Cleaners directed to protecting the health, safety and welfare of the residents from the nuisance and hazard caused by the Cleaners’ industrial scale operations, as well as for work performed on the premises without valid permits.

The Cleaners’ Request To Renew CU and BTR: 2015-2016

26. In addition to the CU required by Code Section 3-212 (A), quoted above, the Code requires businesses operating in the City to procure a BTR.

27. Pursuant to Code Section 11-19:

Prior to engaging in or operating in the city any business, profession or occupation, whether as owner, agent, employee, manager or operator, the business tax shall be paid to the city in full and a business tax receipt shall be procured

from the city as provided for in this article. Engaging or operating in the city any business, profession or occupation without a business tax receipt shall constitute a violation of this section, subject to a fine pursuant to chapter 2 of the City Code.

(Emphasis added).

28. As provided in the Code at Section 11-23: "... [B]usiness tax receipts shall expire on the thirtieth day of September of each year. No business tax receipts shall be issued for more than one (1) year."

29. On or about September 2015, the Cleaners submitted fees to the City to renew its BTR and CU for the Property.

30. On October 12, 2015, Aleem M. Ghany, City Manager, wrote a letter to the Cleaners responding to the Cleaners' request, a copy of which is attached as Exhibit "C" ("Response to Renewal Request").

31. In the Response to Renewal Request, the City Manager reminded the Cleaners that, pursuant to Code Section 3-212.D.2, the City was authorized "to require affidavits and any other information deemed appropriate to establish the legality of the use prior to issuing a Certificate of Use."

32. Continuing, the City Manager stated:

Your business has been cited for zoning violations, so the director [of the Community Planning and Development Department] is requesting that the enclosed affidavit be submitted to support your Certificate of Use application. Your 2015-2016 certificate of use cannot be renewed until your affidavit is submitted and reviewed.

Please be advised, per Section 3-212D of the City's LDRs, the use or structures on site must be in conformity with all applicable City and County Codes. Furthermore, pursuant to Section 3-212I of the LDRs, no certificate of use shall be issued until all pending violations are cured. Given the foregoing, any pending violations against said business would need to be cured prior to approving a renewal of a certificate of use.

(Emphasis added).

33. The Cleaners failed to provide the City with an affidavit supporting the Cleaners' application to renew the CU.

34. There remain uncured Code violations on the Property.

35. The Cleaners continues to operate as an industrial "dry cleaning plant," notwithstanding the fact that the Special Exception Permit and the C-3 zoning allows a commercial "dry cleaning establishment" only.

Nonrenewal of BTR and Revocation of CU and BTR

36. On October 16, 2015, the City Clerk issued to the Cleaners written notice of non-renewal of the Cleaners' BTR ("BTR Nonrenewal Notice"), a copy of which is attached as Exhibit "D."

37. As set forth in the BTR Nonrenewal Notice, the City Clerk revoked the BTR, pursuant to Section 11-29 of the Code, on the grounds that "the taxpayer is conducting a business which is not in compliance with city or county code, state or federal law or regulation."

38. Section 11-29 (a) of the Code provides:

The city clerk is authorized to deny a taxpayer a renewal of a business tax receipt. The following constitute adequate grounds for the city to deny renewal of such tax receipt:

* * *

(4) The taxpayer is conducting a business which is not in compliance with a city or county code, state or federal law or regulation:

* * *

(7) The taxpayer currently has existing liens of property or unpaid code enforcement fines and or penalties.

39. Together with the BTR Nonrenewal Notice, the City Clerk also issued a Revocation of the Cleaners' BTR/CU License ("BTR/CU Revocation"), a copy of which is attached as Exhibit "E."

40. Notwithstanding the City's issuance of the BTR/CU Revocation, the Cleaners continues to operate a "dry cleaning plant" on the Property.

COUNT I: DECLARATORY RELIEF

41. The City re-alleges and incorporates the allegations set forth in paragraphs 1- 40 above.

42. There exists a present, practical bona fide need for a declaration and related injunctive relief pursuant to section 86.011, Fla. Stat.

43. It is the City's position that it is unlawful under the City Code for the Cleaners to operate any business on the Property without a BTR and without a CU. The Cleaners disagrees with the City.

44. It is the City's position that the Cleaners is operating a "dry cleaning plant" on the Property, notwithstanding that the Property does not have a CU and a BTR authorizing any business whatsoever on the Property. The Cleaners disagrees with the City.

45. It is the City's position that it City properly revoked or failed to renew the CU because: (a) the Cleaners failed to respond to the Response to Renewal Request and failed to provide the City with an affidavit attesting to lawful use of the Property; (b) the Cleaners is "conducting a business which is not in compliance with" the City Code because a "dry cleaning plant" is not a permitted use within the C-2 zoning district and the "dry cleaning plant" use is not authorized by the Special Exception Permit; and/or (c) the Cleaners currently has unpaid code enforcement fines and penalties on the Property. The Cleaners disagrees with the City.

46. It is the City's position that it properly revoked the BTR because: (a) the Cleaners is "conducting a business which is not in compliance with" the City Code because "a dry cleaning plant" is not a permitted use with the C-3 zoning district and the "dry cleaning plant" use is not authorized by the Special Exception Permit; and/or (b) the Cleaners currently has unpaid code enforcement fines and penalties on the Property. The Cleaners disagrees with the City.

WHEREFORE, the City seeks a declaration that:

(a) the Cleaners may not operate any business on the Property because the Cleaners lacks a CU and BTR for the Property; and

(b) the Cleaners are using the Property as a "dry cleaning plant" and, as such, the use of the Property violates the Code because a "dry cleaning plant" is not a permitted use in the C-3 zoning district and is a use not authorized by the Special Exception Permit; and, light of the foregoing, the City properly revoked or failed to renew the CU and the BTR; and/or

(c) the Cleaners have unpaid code enforcement fines and penalties on the Property and for this reason, the City properly revoked or failed to renew the CU and the BTR; and

(d) affording such further declaration and relief as the Court deems proper.

COUNT II: INJUNCTIVE RELIEF

47. The City re-alleges and incorporates the allegations set forth in paragraphs 1- 40 and 41-46 above.

48. Because the City seeks to enforce its police power, irreparable injury in the absence of injunctive relief and the lack of an adequate legal remedy are presumed.

49. The City has a clear legal right to injunctive relief.

50. The injunctive relief requested is in the interest of the public because the public has an interest in compliance with the City Code.

WHEREFORE, the City seeks an injunction:

(a) enjoining the Cleaners from operating any business on the Property until it obtains a CU and BTR;

(b) enjoining the Cleaners from operating a “dry cleaning plant” or other unpermitted use on the Property; and

(c) affording such further relief as the Court determines is proper.

Dated: December 11, 2015.

Respectfully submitted,

WEISS SEROTA HELFMAN COLE &
BIERMAN, P.L.

Attorneys for Plaintiff

2525 Ponce de Leon Boulevard, Suite 700

Coral Gables, Florida 33134

Telephone: (305) 854-0800

Facsimile: (305) 854-2323

By: /s/ Laura K. Wendell

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Prepared by and Return to:
V. Lynn Whitfield
City Attorney
CITY OF NORTH MIAMI
776 N.E. 125 Street
North Miami, FL 33161


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OR Bk 26588 Pgs 2383 - 2385 (3pgs)
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HARVEY RUVIN, CLERK OF COURT
MIAMI-DADE COUNTY, FLORIDA

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**BEFORE THE CITY COUNCIL
OF THE
CITY OF NORTH MIAMI, FLORIDA**

MEETING DATE: June 10, 2008
FILE NO. V 10-08

IN RE: The Application of: **North Miami Cleaners, Inc.**
1290 NE 125th Street
North Miami, FL

SPECIAL EXCEPTION PERMIT

The Applicant, North Miami Cleaners, Inc., filed an application with the Building and Zoning Department for a Special Exception Permit. The City Council of North Miami held a public hearing on June 10, 2008 and voted on the following:

**PETITION FOR EXPANSION OF A SPECIAL EXCEPTION USE
PURSUANT TO SECTION 29-4, SCHEDULE I OF THE CITY CODE OF
ORDINANCES TO ALLOW THE PHYSICAL EXPANSION OF A DRY
CLEANING ESTABLISHMENT IN THE C-2A ZONING DISTRICT.**

Notice of the request for the Special Exception was given as required by law. The City Council finds that the property is located in the C-2A Zoning District and further finds:

1. That the Special Exception requested is consistent with the Comprehensive Plan for the area in which the property is located;
2. That the intended use or construction will not result in an impact that will exceed the thresholds for the levels of services as set forth in the Comprehensive Plan;

EXHIBIT "A"

3. That structures and uses associated with the request are consistent with the City Zoning Ordinance;
4. That the public health, safety, morals, and general welfare will not be adversely affected;
5. That adequate off-street parking facilities will be provided; and
6. Necessary safeguards will be provided for the protection of surrounding property, persons, and neighborhood values.

IT IS THEREFORE ORDERED by the City Council, that a Special Exception Permit as requested and set forth above be **GRANTED**, upon the following conditions to which the Applicant has agreed:

1. The Applicant agrees to abide by the special exception criteria pursuant to Section 29-9, City Code of Ordinances.
2. The Applicant receives the approval of the City's Staff Review Committee.
3. A plan for the upgrading of the landscaping shall be submitted for approval and all landscaping shall be regularly maintained by the Applicant.
4. The failure of the Applicant to comply with the aforementioned conditions shall constitute a basis for the revocation of the Special Exception Permit.

This document shall become valid only when recorded in the Public Records of Miami-Dade County, Florida.

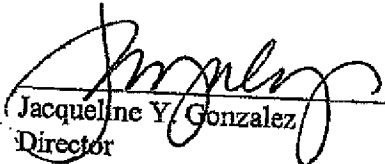
Dated this 16 day of September, 2008.

CITY COUNCIL OF THE CITY OF
NORTH MIAMI, FLORIDA

By: _____

Kevin A. Burns
Mayor

ATTEST:


Jacqueline Y. Gonzalez
Director
Building and Zoning Department

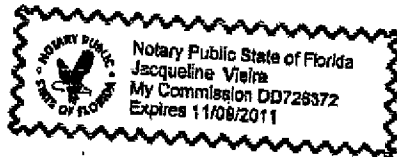
STATE OF FLORIDA)
) §§
COUNTY OF MIAMI-DADE)

I hereby certify that on this day, before me, appeared Kevin A. Burns, to me personally known, who acknowledged that he is the Mayor of the City of North Miami, a Florida municipal corporation, and that this instrument was signed for the purposes contained on behalf of the Corporation and by the authority of the Corporation, and that he further acknowledges the instrument to be the free act and deed of the Corporation.

Sworn to and subscribed before me this 16 day of September, 2008.


NOTARY PUBLIC, STATE OF FLORIDA

My Commission Expires:





ZONING VIOLATION LETTER

October 21, 2014

Gwen Meckler
North Miami Cleaners, Inc.
2100 N.E. 123rd Street
North Miami, FL 33160

RE: Notice of Zoning Violation at 1290 N.E. 125th Street, North Miami, FL 33161 North Miami Cleaners, Inc. / Folio No.: 06-2229-000-0330

Dear Ms. Meckler:

It has been brought to the attention of the Community Planning and Development Department (CP&D) that there may be an inadvertent violation of the City's Land Development Regulations occurring at the commercial property referenced above. As the listed property owner and Registered Agent, you are receiving this notice as the person legally responsible for maintaining the subject property and ensuring compliance with all applicable City regulations.

Our zoning records show that, on May 6, 2008, North Miami Cleaners, Inc. had applied for a Special Exception Permit, pursuant to Section 29-4, Schedule I of the City Code of Ordinances to allow the physical expansion of the existing dry cleaning establishment on the property. The City Council, at its June 10, 2008 regular meeting, approved the Special Exception Permit, subject to the following conditions:

1. The Applicant agrees to abide by the special exception criteria pursuant to Section 29-9, City Code of Ordinances;
2. The Applicant receives the approval of the City's Staff Review Committee;
3. A plan for the upgrading of the landscaping shall be submitted for approval and all landscaping shall be regularly maintained by the Applicant; and
4. The failure of the Applicant to comply with the aforementioned conditions shall constitute a basis for the revocation of the Special Exception Permit.

12400 Northeast B Avenue | North Miami | Florida | 33161
305-895-8825

EXHIBIT "B"



As you have been made aware already by Commander Donald Blanchard of the Code Enforcement Division through the various conversations, emails and meetings he has had with you, neighboring residents of the Windward condominium development have been filing nuisance complaints about your dry cleaning facility regarding the level of noise, fumes and odors that are emanating from the facility, as well as the improper hours of operation of same.

Condition No. 1 of the Special Exception Permit states that the North Miami Cleaners, Inc. has agreed to abide by the special exception criteria pursuant to Section 29-9 of the City Code of Ordinances. Two of these criteria were (1) that the public health, safety, morals, and general welfare will not be adversely affected, and (2) that necessary safeguards would be provided for the protection of surrounding properties, persons, and neighboring values.

The many documented nuisance complaints brought forth by these residents attest to the fact that their health and general welfare have been adversely affected by the operation of your facility and that the necessary safeguards were not provided, which could have otherwise mitigated the negative externalities of that permit. This represents therefore, a bona fide violation of the conditions of the Special Exception Permit, which may result in the revocation of same. Furthermore, since the use of the property as a dry cleaning plant in the C-1 Commercial District is nonconforming, Article 6, Division 2, Section 6-204 of the Land Development Regulations also provides for the discontinuation of a nonconforming use, should it produce odors, noxious fumes, smoke, noise or other external impacts that become a nuisance or hazard to residents.

Please contact me at (305) 893-6511, extension 12159 no later than November 7 to discuss a proposed timeframe and resolution for the nuisance issues expressed by the neighbors. Unless we receive a response from you by this date, this case will be referred to the City Attorney for code enforcement action or any other remedy available at law.

Sincerely,

Nixon Lebrun, AICP, CFM
Zoning Administrator
Community Planning & Development Department

cc: Aleem A. Ghany, City Manager
Dr. Lumane Pluiviose-Claude, Deputy City Manager
Régine Monestime, Esq. City Attorney
Tanya Wilson-Séjour, AICP, Planning Manager
Donald Blanchard, Commander Code Compliance



October 12, 2015

Ms. Gwen Meckler
North Miami Cleaners Inc.
2100 NE 123 Street
North Miami, FL 33160

RE: Request to Renew 2015-16 Certificate of Use

Dear Ms. Meckler:

The City of North Miami ("City") is in receipt of your payment for renewal of a Business Tax Receipt (BTR) and Certificate of Use (CU) for the property located at 12450 NE 13th Avenue in North Miami.

Pursuant to Section 3-212.D.2 of the City's Land Development Regulations ("LDRs"), the director of planning, zoning and development may require affidavits, and any other information deemed appropriate, to establish the legality of the use prior to issuing a Certificate of Use. Your business has been cited for zoning violations, so the director is requesting that the enclosed affidavit be submitted to support your Certificate of Use application. Your 2015-16 Certificate of Use cannot be renewed until your affidavit is submitted and reviewed.

Please be advised, per Section 3-212D of the City's LDRs, the use or structures on site must be in conformity with all applicable City and County Codes. Furthermore, pursuant to Section 3-212I of the LDRs, no certificate of use shall be issued until all pending violations are cured. Given the foregoing, any pending violations against said business would need to be cured prior to approving a renewal of a Certificate of Use. A property owner may appeal a final decision to deny a Certificate of Use by making a written request to appear before the City's Board of Adjustment consistent with Article 2, Section 3-703, of the LDRs.


If you require additional information or need further clarification, please contact our Planning,



Ms. Gwen Meckler
North Miami Cleaners Inc.
October 12, 2015 – page 2

Zoning & Development Director, Ms. Tanya Wilson-Sejour, at 305.895.9826 or tsejour@northmiamifl.gov, or you may contact our City Planner, Mr. Nixon Lebrun, at 305.893.6511 ext. 12159 or nlebrun@northmiamifl.gov.

Sincerely,


Aleem A. Ghany
City Manager

AAG:am
Enclosure

- C Stan Price, Esq.
- John C. Lukacs, Esq.
- Susan Trevarthen, Esq.
- Arthur H. Sorey III, Deputy City Manager
- Roland Galdos, Interim City Attorney
- Tanya Wilson-Sejour, Planning, Zoning & Development Director
- Nixon Lebrun, Zoning Administrator



Michael A. Etienne, Esquire
North Miami Elected City Clerk



City of North Miami Office of the City Clerk
778 NE 125 Street | North Miami | Florida | 33161
Office: 305.895.9815 Fax: 305.899.0497

Pursuant to Sec. 11-29. - Nonrenewal of business tax receipt; revocation of business tax receipt. Your Business Tax Receipt has been revoked for the following reason:

(4) The taxpayer is conducting a business which is not in compliance with a city or county code, state or federal law or regulation:

Please note that:

The taxpayer may appeal to the city manager, the decision of the city clerk denying the renewal of taxpayer's business tax receipt, by a written petition requesting a hearing before a special magistrate. The request for a hearing must be made within 30 days after the notice of nonrenewal by the city clerk is issued to the taxpayer

YOU ARE HEREBY NOTICED that as of October 16, 2015, SPOT MASTER CLEANERS, located at: 12450 NE 13Ave, North Miami, Florida 33161, Business Tax Receipt #: BT-001825, is NOT AUTHORIZED TO CONDUCT BUSINESS IN THE CITY OF NORTH MIAMI.

Sincerely,


Michael A. Etienne, Esquire
North Miami City Clerk

City of North Miami Office of the City Clerk

EXHIBIT "D"



City of North Miami

776 N.E. 125 Street • North Miami, FL 33161 • 305-893-6511

Business Tax/Certificate of Use Receipt

Issued Date: 10/1/2015
Expiration Date: 9/30/2016
Business Tax Receipt #: BT-0016

NOV 01 10 AM 05 PM '15
LAUNDRY 12 WASHER, 6 DRYERS 2 DRY
ES/

INKS/2 FOLDER/2 TOILET/15 EMP 2 SHEET
C/1 FANING 10 AM TO 4 PM MON - FRI
Address:
ANERS

**LICENSE
RENEWED**

3161

NORTH MIAMI CLEANERS
SPOT MASTER CLEANER
12450 NE 13 AVE
NORTH MIAMI, FL 33161

Michael A. Etienne, Esquire, City Clerk

**NOTICE - BUSINESS TAX RECEIPT MUST BE
TRANSFERRED WHEN BUSINESS IS MOVED
OR SOLD.**

NON-TRANSFERABLE • POST IN A CONSPICUOUS PLACE • NON-TRANSFERABLE