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**BEFORE THE WASHINGTON STATE LIQUOR CONTROL BOARD**

IN THE MATTER OF:

LCB NO. 23,769

KRA CORPORATION d/b/a  
RED BIKE DUELING PIANO BAR  
& RESTAURANT  
4441 PACIFIC AVE SE  
LACEY, WA 98503

FINAL ORDER OF THE BOARD  
APPROVING STIPULATED  
SETTLEMENT AGREEMENT

~~PROPOSED~~

LICENSEE

LICENSE NO. 087785

THIS MATTER having come before the Washington State Liquor Control Board (Board) and The Washington State Liquor Control Board Education and Enforcement Division (Enforcement) represented by its attorneys ROBERT M. MCKENNA, Attorney General, and GORDON KARG, Assistant Attorney General, and the Licensee, KRA CORPORATION d/b/a RED BIKE DUELING PIANO BAR & LOUNGE (Licensee), represented by RICHARD N. BOE, Attorney at Law, and the Board having considered the Stipulated Settlement Agreement and Licensing's memorandum recommending acceptance of the settlement agreement, and the Board having had the opportunity to review the file materials maintained in this case, now therefore:

///

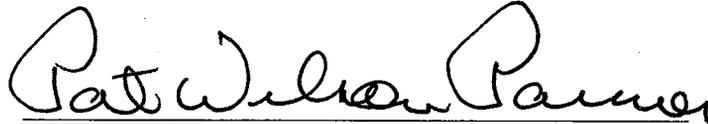
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1 IT IS HEREBY ORDERED that the Stipulated Settlement Agreement for Case No.  
2 23,769 is approved, that the violations charged in Administrative Violation Notice (AVN) No.  
3 2J0216A, are sustained, and the termination of the Licensee's business operations and the  
4 voluntary relinquishment of its liquor license shall act in lieu of any penalty.

5 DATED this 30<sup>th</sup> day of March, 2011.

6 WASHINGTON STATE LIQUOR CONTROL BOARD

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8 PATRICK PARMER  
9 Chief of Enforcement  
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**RECEIVED**

**MAR 30 2011**

**LIQUOR CONTROL BOARD  
BOARD ADMINISTRATION**

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**BEFORE THE WASHINGTON STATE LIQUOR CONTROL BOARD**

IN THE MATTER OF:  
  
KRA CORPORATION d/b/a  
RED BIKE DUELING PIANO BAR  
& RESTAURANT  
4441 PACIFIC AVE SE  
LACEY, WA 98503  
  
LICENSEE  
  
LICENSE NO. 087785

LCB NO. 23,769  
  
STIPULATED SETTLEMENT  
AGREEMENT

The Washington State Liquor Control Board Education and Enforcement Division (Enforcement) represented by its attorneys ROBERT M. MCKENNA, Attorney General and GORDON KARG, Assistant Attorney General and the Licensee, KRA Corporation d/b/a Red Bike Dueling Piano Bar & Restaurant (Licensee) represented by RICHARD N. BOE, Attorney at Law, hereby enter into this stipulated settlement agreement for Liquor Control Board Case No. 23,769.

**I. INTRODUCTION**

The Washington State Liquor Control Board, Enforcement and Education Division charged the above-named Licensee, in Administrative Violation Notice (AVN) No. 2J0216A, with the following alleged violation of the Washington State Liquor Act:

That on or about August 4, 2010, the above-named Licensee or employee(s) thereof, allowed a third party to have an unauthorized interest or ownership in the Licensee's business.

STIPULATED SETTLEMENT  
AGREEMENT

RED BIKE DUELING PIANO BAR &  
RESTAURANT  
LCB NO. 23,769

ATTORNEY GENERAL OF WASHINGTON  
1125 Washington Street SE  
PO Box 40100  
Olympia, WA 98504-0100  
(360) 664-9006

1 Enforcement and the Licensee wish to enter into a settlement agreement concerning the  
2 above-referenced AVN.

3 **II. AGREEMENT OF THE PARTIES**

4 Enforcement and the Licensee agree to the following:

5 1. Enforcement and the Licensee enter into this agreement to avoid the time and  
6 expense of further litigation. The Licensee explicitly waives the right of further administrative  
7 review of all matters related to the above -referenced violation and AVN. The Licensee hereby  
8 voluntarily withdraws its requests for a hearing in this matter.

9 2. This agreement constitutes the final written expression of all the terms of this  
10 agreement and is a complete and exclusive statement of these terms.

11 3. It is the Licensee's position that its corporate officer's were unaware of the fact  
12 that its employees were allowing a non-true party in interest to use its liquor license and such  
13 use was contrary to KRA Corporation's general policy.

14 4. The Licensee stipulates to the following violation of the Washington State  
15 Liquor Act: the Licensee or an employee thereof allowed another party/person, who is not a  
16 true party in interest, to use the Licensee's liquor license in violation of RCW 66.24.010.

17 5. The parties agree that this is the Licensee's first violation for allowing another  
18 party/person, who is not a true party in interest, to use the Licensee's liquor license in violation  
19 of RCW 66.24.010 and it has a standard penalty of a five (5) day suspension of the Licensee's  
20 liquor license or a monetary penalty of one thousand five-hundred dollars (\$1,500).

21 6. The Licensee acknowledges it has terminated its business operations,  
22 voluntarily relinquished its liquor license and no longer has an interest in the license at issue  
23 and therefore has elected to not incur the time and expense of litigation.

24 7. The parties agree that the Licensee's cessation of business operations and  
25 voluntarily relinquishing of its liquor license has effectively mooted Enforcement's actions and  
26 shall act in lieu of the standard penalty.

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8. The Licensee agrees that if it has failed to relinquish its liquor license, for any reason, the standard penalty of a 5-day suspension of the Licensee's liquor license or a monetary option of \$1,500, shall be imposed.

9. The parties recognize that this settlement agreement is subject to approval by the Washington State Liquor Control Board.

STIPULATED AND AGREED this 29 day of March 2011.

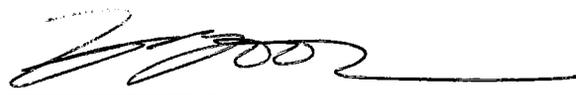
ROBERT M. MCKENNA  
Attorney General



GORDON KARG, WSBA #37178  
Assistant Attorney General  
Attorneys for Washington State  
Liquor Control Board Education and  
Enforcement Division



RICHARD N. BOE, WSBA #38695  
Attorney at Law for,  
KRA CORPORATION d/b/a  
RED BIKE DUELING PIANO BAR &  
RESTAURANT  
Former Licensee



HYUN YOON  
Governing Member,  
KRA CORPORATION d/b/a  
RED BIKE DUELING PIANO BAR &  
RESTAURANT  
Former Licensee



**Washington State  
Liquor Control Board**

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April 1, 2011

Richard N. Boe, Attorney for Licensee  
5600 Kitsap Way  
Bremerton, WA 98312-2236

KRA Corporation, Licensee  
d/b/a Red Bike Dueling Piano Bar & Restaurant  
4441 Pacific Ave SE  
Lacey, WA 98503-1116

Gordon Karg, AAG  
GCE Division, Office of Attorney General  
1125 Washington Street SE  
PO Box 40100  
Olympia, WA 98504-0100

**RE: FINAL ORDER OF THE BOARD APPROVING STIPULATED SETTLEMENT AGREEMENT**

**LICENSEE: KRA Corporation**

**TRADE NAME: Red Bike Dueling Piano Bar & Restaurant**

**LOCATION: 4441 Pacific Ave SE, Lacey, WA 98503-1116**

**LICENSE NO. 087785-1R**

**ADMINISTRATIVE VIOLATION NOTICE NO: 2J0216A**

**LCB HEARING NO. 23,769**

**UBI: 602 892 078 001 0001**

Dear Parties:

Enclosed please find a Declaration of Service by Mail and a copy of the Final Order for the above referenced matter along with a copy of the Stipulated Settlement Agreement.

If you have any questions, please contact me at (360) 664-1602.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin McCarroll".

Kevin McCarroll  
Adjudicative Proceedings Coordinator

Enclosures (3)

cc: Tacoma and Olympia Enforcement and Education Divisions, WSLCB  
Amber Harris, WSLCB

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3 **WASHINGTON STATE LIQUOR CONTROL BOARD**

4 IN THE MATTER OF:

LCB NO. 23,769

5 KRA CORPORATION  
6 d/b/a RED BIKE DUELING PIANO  
7 BAR & RESTAURANT  
8 4441 PACIFIC AVE SE  
9 LACEY, WA 98503-1116

DECLARATION OF SERVICE BY  
MAIL

LICENSEE

10 LICENSE 087785  
11 AVN NO. 2J0216A

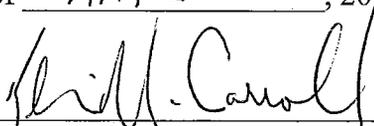
12 I certify that I caused a copy of the *FINAL ORDER OF THE BOARD APPROVING*  
13 *STIPULATED SETTLEMENT AGREEMENT* in the above-referenced matter to be served on all  
14 parties or their counsel of record by US Mail Postage Prepaid via Consolidated Mail Service  
15 for Licensees; by Campus Mail for the Office of Attorney General, on the date below to:

17 RICHARD N. BOE, ATTORNEY FOR  
18 LICENSEE  
19 5600 KITSAP WAY  
20 BREMERTON, WA 98312-2236

GORDON KARG, ASSISTANT ATTORNEY  
GENERAL, GCE DIVISION  
OFFICE OF THE ATTORNEY GENERAL  
MAIL STOP 40100

21 KRA CORPORATION, LICENSEE  
22 d/b/a RED BIKE DUELING PIANO BAR &  
23 RESTAURANT  
24 4441 PACIFIC AVE SE  
25 LACEY, WA 98503-1116

26 DATED this 1<sup>st</sup> day of April, 2011, at Olympia, Washington.

  
Kevin McCarroll, Adjudicative Proceedings Coordinator

DECLARATION OF SERVICE BY  
MAIL

1

Washington State Liquor Control Board  
3000 Pacific Avenue SE  
PO Box 43076  
Olympia, WA 98504-3076  
(360) 664-1602