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7 **BEFORE THE WASHINGTON STATE LIQUOR CONTROL BOARD**

8 IN THE MATTER OF:

LCB NO. 24,725

9 TWENTY ONE LLC D/B/A
10 KIRKLAND PUB

FINAL ORDER OF THE BOARD

11 21 CENTRAL WAY
KIRKLAND, WA 98033-6116

[PROPOSED]

12 LICENSE NO. 355289
13 AVN NO. 3W3045A

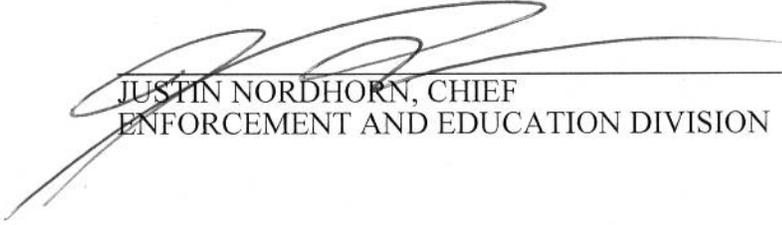
14 THIS MATTER having come before the Washington State Liquor Control Board
15 (Board) and the Washington State Liquor Control Board Education and Enforcement Division
16 (Enforcement) represented by its attorneys, ROBERT W. FERGUSON, Attorney General, and
17 TIMOTHY D. FORD, Assistant Attorney General, and the Licensee, TWENTY ONE LLC
18 D/B/A KIRKLAND PUB represented by the LLC member FARAZ ROUHANI, and the Board
19 having considered the Stipulated Settlement Agreement and Enforcement's memorandum
20 recommending acceptance of the Settlement Agreement, and the Board having had the
21 opportunity to review the file materials maintained in this case, now therefore:

22 IT IS HEREBY ORDERED the Board accepts, adopts, and incorporates herein by
23 reference the Stipulated Settlement Agreement between Enforcement and the Licensee in the
24 above-captioned matter and further that the violations set forth in the Complaint dated May 20,
25 2013 are sustained and the Licensee shall pay seventy five (\$75) dollars in lieu of suspension
26 for the referenced violation pursuant to the terms of the stipulated settlement agreement.

1 In the event the Licensee fails to pay the seventy five (\$75) dollars as directed by the
2 stipulated settlement agreement, the Licensee shall serve a five (5) day suspension of its liquor
3 license, the dates and time of which shall be set by the Washington State Liquor Control
4 Board.

5 DATED this 21 day of AUGUST, 2013.

6 WASHINGTON STATE LIQUOR CONTROL BOARD

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9 JUSTIN NORDHORN, CHIEF
10 ENFORCEMENT AND EDUCATION DIVISION
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KIRKLAND PUB
LICENSE NO. 355289
LCB NO. 24,725

FINAL ORDER OF THE BOARD
[PROPOSED]

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BEFORE THE WASHINGTON STATE LIQUOR CONTROL BOARD

IN THE MATTER OF:

LCB NO. 24,725

TWENTY ONE LLC D/B/A
KIRKLAND PUB

STIPULATED SETTLEMENT
AGREEMENT

21 CENTRAL WAY
KIRKLAND, WA 98033-6116

LICENSE NO. 355289
AVN NO. 3W3045A

The Washington State Liquor Control Board Education and Enforcement Division (Enforcement) represented by its attorneys ROBERT FERGUSON, Attorney General and TIMOTHY D. FORD, Assistant Attorney General and the Licensee TWENTY ONE LLC D/B/A KIRKLAND PUB hereby enter into this stipulated settlement agreement for Liquor Control Board Case No. 24,725.

I. INTRODUCTION

The Washington State Liquor Control Board, Enforcement and Education Division charged the above-named Licensee, in Administrative Violation Notice (AVN) No. 3W3045A with the following alleged violation of the Washington State Liquor Control Board rules and regulations: On or about February 14, 2013, the above-named Licensee changed its name and

1 did so without authorization from the Washington State Liquor Control Board in violation of
2 WAC 314-07-090.

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

5 **II. AGREEMENT OF THE PARTIES**

6 Enforcement and the Licensee agree to the following:

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

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

13 3. The Licensee admits the violation set forth in AVN No. 3W3045A that on or
14 about February 14, 2013, the above-named Licensee changed its name and did so without
15 authorization from the Washington State Liquor Control Board in violation of WAC 314-07-
16 090.

17 4. The Licensee acknowledges this a first violation of this type within a twenty
18 four month period, which carries a standard penalty of a five day (5) suspension of the license or a
19 one hundred dollar (\$100) penalty.

20 5. In return for stipulating to the violation, and for submitting an application, and
21 for receiving approval from the Licensing division for a name change, Enforcement agrees to
22 allow the Licensee to pay a reduced monetary penalty of seventy five dollars (\$75.00) in lieu
23 of suspension. The Licensee agrees to pay a monetary penalty of seventy five dollars (\$75.00)
24 to settle AVN No. 3W3045A.

1 6. The Licensee shall pay the full monetary penalty of seventy five dollars
2 (\$75.00) no later than thirty (30) days after the date of the Final Order of the Board. Payment
3 shall be sent to:

4 **Washington State Liquor Control Board**
5 **P.O. Box 43085**
6 **Olympia, WA 98504-3085**

7 7. In the event that the Licensee fails to make a full and timely payment of the
8 monetary penalty as required in Section II, Paragraph 6, then the standard penalty in Section II,
9 Paragraph 4 shall be imposed.

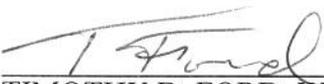
10 8. The undersigned parties declare that the terms of this Settlement Agreement are
11 completely read, wholly understood, and voluntarily accepted for the purpose of making a full
12 and final compromise and settlement of any and all claims arising from the above referenced
13 Complaint.

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

16 STIPULATED AND AGREED this 12 day of July 2013.

17 
18 _____
19 FARAZ ROUHANI, OWNER
20 TWENTY ONE LLC Licensee d/b/a
21 KIRKLAND PUB

22 ROBERT FERGUSON
23 Attorney General

24  29 July 2013
25 _____
26 TIMOTHY D. FORD, WSBA #29254
27 Assistant Attorney General
28 Attorneys for Washington State
29 Liquor Control Board Education and
30 Enforcement Division



Washington State
Liquor Control Board

August 21, 2013

Faraz Rouhani
Twenty One LLC
d/b/a Kirkland Pub
3400 188th St SW Ste 300
Lynnwood, WA 98037-4708

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

RE: FINAL ORDER OF THE BOARD
LICENSEE: Twenty One LLC
TRADE NAME: Kirkland Pub
LOCATION: 21 Central Way, Kirkland, WA 98033-6116
LICENSE NO. 355289-3K
ADMINISTRATIVE VIOLATION NOTICE NO. 3W3045A
LCB HEARING NO. 24,725
UBI: 603-006-287-001-0002

Dear Parties:

Please find the enclosed Final Order of the Board and Declaration of Service by Mail in the above-referenced matter, as well as a copy of the Stipulated Settlement Agreement. **The applicable monetary penalty is due by September 20, 2013.**

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Kevin McCarroll".

Kevin McCarroll
Adjudicative Proceedings Coordinator

Enclosures

cc: Mt. Vernon Enforcement and Education Division, WSLCB
Jamie Marshall, WSLCB

1 **WASHINGTON STATE LIQUOR CONTROL BOARD**

2 IN THE MATTER OF:

LCB NO. 24,725

3 TWENTY ONE LLC
4 d/b/a KIRKLAND PUB
5 21 CENTRAL WAY
6 KIRKLAND, WA 98033-6116

DECLARATION OF SERVICE BY
MAIL

7 LICENSEE

8 LICENSE NO. 355289-3K
9 AVN NO. 3W3045A

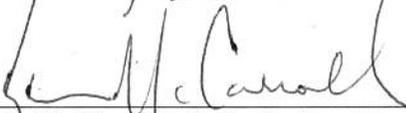
10 I certify that I caused a copy of the FINAL ORDER OF THE BOARD in the above-
11 referenced matter to be served on all parties or their counsel of record by US Mail Postage
12 Prepaid via Consolidated Mail Service for applicants and licensees, by campus mail for state
13 offices, on the date below to:

14
15 FARAZ ROUHANI
16 TWENTY ONE LLC
17 d/b/a KIRKLAND PUB
18 3400 188TH ST SW STE 300
19 LYNNWOOD, WA 98037-4708

OFFICE OF THE ATTORNEY GENERAL
MAIL STOP 40100, GCE DIVISION
TIM FORD,
ASSISTANT ATTORNEY GENERAL

20 FARAZ ROUHANI
21 TWENTY ONE LLC
22 d/b/a KIRKLAND PUB
23 21 CENTRAL WAY
24 KIRKLAND, WA 98033-6116

25 DATED this 21st day of August, 2013, at Olympia, Washington.

26 
Kevin McCarroll, Adjudicative Proceedings Coordinator