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

8 IN THE MATTER OF:

NO. L-25,425

9 KSA PLUS, INC. d/b/a 4TH AVE. SHELL

FINAL ORDER OF THE BOARD

10 2319 E. 4TH AVE.,
11 OLYMPIA, WA 98506

[PROPOSED]

12 LIQUOR LICENSE NO. 364038
AVN NO. 1F5009D

13 THIS MATTER having come before the Washington State Liquor Control Board
14 (Board) and the Washington State Liquor Control Board Education and Enforcement Division
15 (Enforcement) by and through its attorneys, ROBERT W. FERGUSON, Attorney General, and
16 ARYNA ANDERSON, Assistant Attorney General, and KSA PLUS, INC. d/b/a 4TH AVE.
17 SHELL (Licensee) by and through its representative, EUNG KIL AN, and the parties having
18 voluntarily entered into a stipulated settlement agreement for case number L-25,425, and the
19 Board having considered the Stipulated Settlement Agreement and Enforcement's
20 Memorandum recommending acceptance of the Stipulated Settlement Agreement, and the
21 Board having had the opportunity to review the file materials maintained in this case, now
22 therefore:

23 IT IS HEREBY ORDERED that the Stipulated Settlement Agreement in the above
24 captioned case is adopted in its entirety; and the AVN for case number L-25,425 is sustained.
25 The Licensee shall pay three hundred dollars (\$300.00) no later than thirty (30) days after the
26 date of the Final Order of the Board. **The payments shall be sent to:**

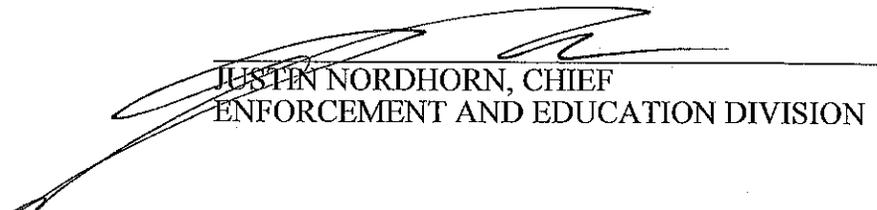
1 **Washington State Liquor Control Board**
2 **P.O. Box 43085**
3 **Olympia, WA 98504-3085**

4 In the event that the Licensee fails to make full and timely payment of the three hundred
5 dollar (\$300.00) monetary penalty, a five (5) day suspension of the Licensee's liquor license
6 will go into effect, the dates and time of which shall be set by the Washington State Liquor
7 Control Board.

8 Finally, the Licensee and its employee(s) shall adopt and enforce the Responsible
9 Vendor Program or attend the Responsible Liquor Sales Class.

10 DATED this 14 day of APRIL, 2015.

11 WASHINGTON STATE LIQUOR CONTROL BOARD

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14 JUSTIN NORDHORN, CHIEF
15 ENFORCEMENT AND EDUCATION DIVISION
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25 4TH AVE SHELL
26 LCB NO. L-25,425
LICENSE NO. 364038

RECEIVED

FEB 17 2015

Liquor Control Board
Board Administration

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

8 IN THE MATTER OF:

LCB NO. L-25,425

9 KSA PLUS, INC. d/b/a
10 4TH AVE. SHELL
11 2319 E. 4TH AVE.,
OLYMPIA, WA 98506

STIPULATED
SETTLEMENT AGREEMENT

12 LIQUOR LICENSE NO. 364038
13 AVN NO. 1F5009D

14 The Washington State Liquor Control Board Education and Enforcement Division
15 (Enforcement), by and through its attorneys, ROBERT W. FERGUSON, Attorney General, and
16 ARYNA ANDERSON, Assistant Attorney General, and KSA PLUS, Inc. d/b/a 4th AVE.
17 SHELL (Licensee) by and through its representative, EUNG KIL AN, hereby enter into this
18 stipulated settlement agreement for Liquor Control Board (LCB) case number L-25,425.

19 **I. INTRODUCTION**

20 The Washington State Liquor Control Board, Enforcement and Education Division
21 issued administrative violation notice (AVN) 1F5009D to the aforementioned Licensee alleging
22 that on or about January 9, 2015, the Licensee and/or its employee gave, sold and/or otherwise
23 supplied liquor to a person under twenty-one years of age contrary to RCW 66.44.270(1),
24 WAC 314-11-020(1) and WAC 314-16-150(1).

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1 **II. AGREEMENT OF THE PARTIES**

2 Enforcement and the Licensee agree to the following:

3 1. The parties enter into this Agreement to avoid the time and expense of further
4 litigation.

5 2. The Licensee explicitly waives the right of further administrative review of all
6 matters related to the above-referenced AVN. The Licensee hereby voluntarily withdraws its
7 request for a hearing in this matter.

8 3. This Agreement constitutes the final written expression of all the terms of this
9 Agreement, and it is a complete and exclusive statement of these terms.

10 4. The Licensee admits to the violation set forth in AVN 1F5009D. Specifically,
11 that on or about January 9, 2015, the Licensee and/or its employee gave, sold and/or otherwise
12 supplied liquor to a person under twenty-one years of age contrary to RCW 66.44.270(1),
13 WAC 314-11-020(1) and WAC 314-16-150(1).

14 5. The Licensee acknowledges that the above referenced violation is the Licensee's
15 first violation within a two-year period, for which the standard penalty is suspension of the
16 liquor license for five (5) days or a monetary penalty of five hundred dollars (\$500).

17 6. The Licensee agrees to pay a monetary penalty of three hundred dollars (\$300)
18 within thirty (30) days of the date of the Final Order of the Board, no later than 4:00 p.m. on the
19 applicable date, for the violation stipulated to in Section II, Paragraph 4. **Payment shall be**
20 **sent to:**

21 **Washington State Liquor Control Board**
22 **PO Box 43085**
Olympia, WA 98504-3085

23 7. In the event that the Licensee fails to make the full payment of the monetary
24 penalty on time, as set out and required by Section II, Paragraph 6, it shall be subject to a five
25 (5) day suspension of its liquor license, the date and time of suspension to be set by the Board.
26

1 8. The Licensee further agrees that the Licensee and its employee(s) will adopt and
2 enforce the Responsible Vendor Program or attend the Responsible Liquor Sales Class.

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

5 STIPULATED AND AGREED TO by:

6 ROBERT W. FERGUSON
7 Attorney General

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9 
10 ARYNA ANDERSON, WSBA #42344
11 Assistant Attorney General
12 Attorneys for Washington State
13 Liquor Control Board Education and
14 Enforcement Division

2/5/2015
DATE

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15 EUNG KIL AN
16 Representative of KSA PLUS, Inc.
17 d/b/a 4th AVE. SHELL (Licensee)

2. 3. 15
DATE



Washington State
Liquor Control Board

April 15, 2015

Eung Kil An
KSA Plus, Inc.
d/b/a 4th Ave Shell
18809 132nd Place SE
Renton, WA 98058-8010

Aryna Anderson, 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: KSA Plus, Inc.
TRADE NAME: 4th Ave Shell
LOCATION: 2319 E 4th Ave, Olympia, WA 98506
LICENSE NO. 364038
ADMINISTRATIVE VIOLATION NOTICE NO. 1F5009D
LCB HEARING NO. L-25,425
UBI: 602-780-152-001-0001

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 May 18, 2015. The address for payments is WSLCB, P.O. Box 43085, Olympia, WA 98504-3085. Please label the check with your License Number and Violation Notice Number listed above. **If payment is not received timely, then suspension will take place from 11:00 a.m. on Thursday, June 4, 2015 until 11:00 a.m. on Tuesday, June 9, 2015.**

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

cc: Tacoma and Olympia Enforcement and Education Divisions, WSLCB
Kendra Boyd, Enforcement and Education Division Headquarters, WSLCB

WASHINGTON STATE LIQUOR CONTROL BOARD

IN THE MATTER OF:

KSA PLUS, INC.
d/b/a 4TH AVE SHELL
2319 E 4TH AVE
OLYMPIA, WA 98506

LICENSEE

LICENSE NO. 364038
AVN NO. 1F5009D

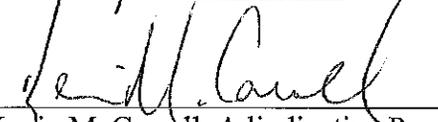
LCB NO. L-25,425

DECLARATION OF SERVICE BY
MAIL

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

EUNG KIL AN KSA PLUS, INC. d/b/a 4 TH AVE SHELL 18809 132 ND PLACE SE RENTON, WA 98058-8010	OFFICE OF THE ATTORNEY GENERAL MAIL STOP 40100, GCE DIVISION ARYNA ANDERSON, ASSISTANT ATTORNEY GENERAL
EUNG KIL AN KSA PLUS, INC. d/b/a 4 TH AVE SHELL 2319 E 4TH AVE OLYMPIA, WA 98506-4732	

DATED this 15th day of April, 2015 at Olympia, Washington.


Keyin McCarroll, Adjudicative Proceedings Coordinator