

**BEFORE THE ALCOHOLIC BEVERAGE CONTROL APPEALS BOARD  
OF THE STATE OF CALIFORNIA**

AB-10029

File: 20-645157; Reg: 25095542

7-Eleven, Inc., and Chandan and Sons Corporation  
dba: 7-Eleven #19835F  
6015 E. Kings Canyon Road  
Fresno, California 93727-3508  
Appellants/Licensees

v.

DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL,  
Respondent

Administrative Law Judge at the Department Hearing:  
Honorable Alberto Roldan

Appeals Board Hearing: January 16, 2026  
Sacramento, CA/Videoconference

**ISSUED JANUARY 21, 2026**

Appearances: Jeffrey S. Kravitz, of Kravitz & Chan, LLP, as counsel for  
appellant Chandan & Sons Corporation, and;  
  
Gregory Hayes, as counsel for the Department of Alcoholic  
Beverage Control.

**OPINION**

7-Eleven, Inc. and Chandan and Sons Corporation, doing business as 7-  
Eleven #19835F (hereinafter "appellants"<sup>1</sup>) appeal from an order of the

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<sup>1</sup> Although 7-Eleven, Inc. and Chandan and Sons Corporation are represented by two different attorneys, since 7-Eleven, Inc. did not file an opening brief, we will treat both parties as one party for purposes of the present appeal.

Department of Alcoholic Beverage Control<sup>2</sup> (hereinafter referred to as the “Department”) revoking its license on the grounds that Prahbjot Singh (hereinafter “Singh”), appellants’ officer, director, or person holding ten percent or more of the corporate stock, was the subject of a plea, verdict, or judgment of guilty or pled *nolo contendere* (no contest) to a public offense involving moral turpitude. The Department found that such a conviction constitutes grounds for suspension or revocation of the license under Business and Professions Code<sup>3</sup> sections 23405(d) and 24200(d).

Further, the Department revoked appellants’ license under sections 24200, 24200(a) and (b) because the continuance of appellants’ license would be contrary to public welfare and/or morals as set forth in Article XX, Section 22 of the California State Constitution. For the following reasons, the Department’s decision is affirmed.

### **I. FACTUAL BACKGROUND & PROCEDURAL HISTORY**

The Department issued an off-sale beer and wine license to appellants for the licensed premises on March 1, 2023. As of January 22, 2025, Singh was listed on appellants’ corporate questionnaire (form ABC-243) as the sole corporate officer of Chandan and Sons Corporation. The same document indicated that

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<sup>2</sup> The Department’s Decision, dated October 7, 2025, is set forth in the appendix.

<sup>3</sup> All statutory references are to the California Business and Professions Code unless otherwise stated.

Singh held 100 percent of the corporation's stock. Singh, through the corporation, entered into a business relationship with 7-Eleven Corporation to operate the licensed premises as a 7-Eleven branded business.

On January 22, 2025, Singh pled *nolo contendere* to a misdemeanor violation of California Penal Code section 273.5(a) in case number F24907811. Penal Code section 273.5(a) makes it unlawful to inflict corporal injury on a spouse, cohabitant, fiancé, a person with whom the offender has a dating relationship with, or the mother or father of the offender's child.<sup>4</sup> The plea occurred at a scheduled preliminary hearing after a motion to reduce the charge from a felony to a misdemeanor. (Exhibit D-3.)

Pursuant to a notice of conditional settlement, sentencing in the matter was set for January 26, 2026. Singh was also subject to interim conditions, such as being required to complete a 12-week anger management program and to not commit any new offenses. Upon successful compliance with the interim conditions, Singh would be able to withdraw his plea and petition the court for a dismissal of the matter.

The Department filed an accusation on May 27, 2025. The Department held an administrative hearing on August 6, 2025. The administrative law judge (ALJ) issued a proposed decision on August 20, 2025. The ALJ recommended that the accusation be sustained on the grounds that Singh was the sole

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<sup>4</sup> Penal Code section 273.5 also applies to individuals who were formerly in one or more of the above-referenced relationships with the offender.

corporate officer and was convicted of a crime of moral turpitude. The ALJ also recommended that appellants' license be revoked. The Department adopted the proposed decision on October 1, 2025, and issued a certificate of decision on October 6, 2025.

Appellants filed a timely appeal contending that the Department's decision is not supported by substantial evidence, the Department did not consider mitigating factors when determining the penalty, and there is relevant evidence which could not have been produced in the exercise of reasonable diligence at the administrative hearing.

## **II. STANDARD OF REVIEW**

The scope of the Board's review is defined by section 23084. The Board is not a trier of fact, and it does not reweigh evidence, evaluate witness credibility, or substitute its judgment for that of the Department. The Board's review is limited to determining:

1. Whether the Department has proceeded without or in excess of its jurisdiction;
2. Whether the Department has proceeded in the manner required by law;
3. Whether the Department's decision is supported by its findings;
4. Whether the findings are supported by substantial evidence in light of the whole record, and;
5. Whether there is relevant evidence, which, in the exercise of reasonable diligence, could not have been produced or which was improperly excluded at the hearing before the department.

Substantial evidence is relevant evidence that a reasonable mind might accept as adequate to support a conclusion. The Board does not reweigh conflicting evidence but instead considers whether the Department's findings are supported by such evidence in light of the whole record. (*Martin v. Alcoholic Beverage Control Appeals Board* (1959) 52 Cal.2d 287, 291.)

The Board also considers whether any procedural error or evidentiary ruling prejudiced the appellant. Reversal is not warranted unless the appellant affirmatively demonstrates that an error resulted in prejudice. (Cal. Const., art. VI, § 13; Code Civ. Proc., § 475; *Reimel v. House* (1969) 268 Cal.App.2d 780, 787; *Citizens for Open Government v. City of Lodi* (2012) 205 Cal.App.4th 296, 308.) The burden is on the party seeking reversal to show that it is reasonably probable a more favorable result would have been reached absent the alleged error. (*City of Oakland v. Public Employees' Retirement System* (2002) 95 Cal.App.4th 29, 51–52; *Thornbrough v. Western Placer Unified School Dist.* (2013) 223 Cal.App.4th 169, 200.)

This standard imposes a high threshold. The Board may not overturn a decision simply because different inferences could be drawn from the evidence. The question is not whether the Board would have reached the same result, but whether the Department's findings are supported by substantial evidence and whether appellant has shown prejudicial error.

### III. ANALYSIS

Article XX, section 22 of the California Constitution gives the power to the Department to:

[S]uspend or revoke any specific alcoholic beverages license if it shall determine for good cause that granting or continuance of such license would be contrary to public welfare or morals, or that a person seeking or holding a license has violated any law prohibiting conduct involving moral turpitude.

Section 24200(d) states that a license can be revoked or suspended based on a “plea, verdict, or judgment of guilty, or the plea of *nolo contendere* to any public offense involving moral turpitude ... .” Violation of Penal Code section 273.5 is a crime of moral turpitude. (*People v. Burton* (2015) 243 Cal.App.4th 129, 134, 196 Cal.Rptr.3d 392.) Section 23405(d) allows the Department to treat “any officer, director, or person holding 10 percent or more of the corporate stock of [a licensed] corporation ... as if the person was a licensee.”

It is undisputed that Singh is a corporate officer holding ten percent or more of the stock in a licensed corporation. (Findings of Fact at ¶ 4.) It is also undisputed that Singh entered a plea of *nolo contendere* to a misdemeanor violation of Penal Code section 273.5, and that the conditions of the plea allowed Singh to withdraw his plea and petition the Court for dismissal upon completion of a 12-week anger management program and requirement that he not commit any additional offenses. (*Id.* at ¶¶ 4-5.)

On appeal, appellants wish to introduce new evidence that Singh successfully withdrew his no contest plea pursuant to Penal Code section 1018 and the criminal case against him was dismissed pursuant to Penal Code section 1035. (Appellant's Opening Brief "AOB" at p. 7.) Appellants' claim the new evidence prohibits the Board from considering Singh's original no contest plea. (*Id.* at pp. 9-13.) Based on this new evidence, appellants ask the Board to either remand the case back to the Department to consider the new evidence or reverse the Department's decision.

The Department's position is that Singh's plea withdrawal does not constitute "newly discovered evidence" since the evidence did not exist at the time of the hearing. The Department further disagrees with appellants that it cannot rely on Singh's former plea as a basis for revocation. Finally, the Department argues that the Decision must stand because appellants have not shown prejudice, since the Department could rely on Singh's underlying conduct as the basis for revocation, instead of the plea.

#### A. Newly Discovered Evidence

Section 23084(e) allows the Board to determine "[w]hether there is relevant evidence, which, in the exercise of reasonable diligence, could not have been produced or which was improperly excluded at the hearing before the department." Rule 198<sup>5</sup> sets forth the format in which to satisfy the

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<sup>5</sup> All references to "rules" herein are to Title 4 of the California Code of Regulations unless otherwise stated.

requirements of section 23084. Appellants lay out the basis for the new evidence in their Opening Brief but admit that new evidence “must have existed at the time of the original hearing but could not, with reasonable diligence, have been produced then.” (AOB, at pp. 6-9.) It is undisputed that none of the proposed exhibits appellants wish the Board to consider existed at the time of the administrative hearing. (AOB, exhibits A-E.) Further, at the time of the Decision, on October 7, 2025, Singh had not yet withdrawn his no contest plea because that did not occur until October 29, 2025.

The Department cites *Arron v. Wib Holdings* (2018) 21 Cal.App.5th 1069, 1079 (“*Arron*”), for the proposition that evidence can only be newly discovered if it existed at the time of the original hearing. In *Arron*, the court articulated the meaning of “newly discovered evidence,” and stated “[i]mplicit in that term is the concept that the evidence existed but remained undiscovered at the time of trial.” (*Ibid.*) The court in *Arron* also looked to analogous federal statutes, in which interpreting caselaw “uniformly held that evidence of events occurring after the trial is not newly discovered evidence.” (*Id.* at p. 1080.)

We agree with the Department and the court in *Arron*. Implicit in section 23084 is the idea that evidence that could not be produced at the hearing was in existence, but for some reason, was not available in the exercise of reasonable diligence. Holding otherwise would leave decisions and opinions subject to review months or even years down the road.

## B. Effect of Singh's Plea Withdrawal

Notwithstanding the above, appellants still argue that the new evidence must be considered because: 1) title 4 of the California Code of Regulations, section 198 "does not specifically require that new evidence was in existence at the time of the original hearing"; 2) "the evidence of the plea withdrawal prohibits the use of the plea for any purpose," and; 3) the evidence was presented to the Department in time for reconsideration. (AOB, at pp. 9-14.)

### 1. *Title 4 CCR Section 198*

First, the Board rejects appellants argument regarding 4 CCR section 198. This section is not a stand-alone regulation; it must be read in the context of section 23084. Without section 23084, the Board has no authority to consider newly discovered evidence. Therefore, the same requirement that evidence be in existence under section 23084 applies to 4 CCR section 198.

### 2. *Effect of Singh's Withdrawn Plea*

As to appellants' argument that the Department cannot use Singh's plea for any purpose, the Department argues that *Ahn v. Parisotto*, 114 Cal.App.5th 697, allows it to rely on Singh's former plea as a basis to revoke appellants' license. In *Ahn*, a medical doctor, Ahn, pleaded guilty to a misdemeanor violation for accepting illegal kickbacks for medical referrals and was ordered to a term of probation. (*Id.* at p. 700.) After paying restitution and other fees, Ahn successfully moved to have the matter dismissed under Penal Code section 1385.

In *Ahn*, the operative statute was Labor Code section 139.21, which states that a medical provider will be suspended from the state's workers' compensation program when the provider is convicted of certain crimes relating to fraud. (*Ahn, supra* at p. 700.) The court found that Ahn's crime met the definition of fraud, so the Department of Industrial Relations, an administrative body, suspended him from the workers' compensation program. (*Ibid.*) Ahn challenged the suspension because the misdemeanor case had been dismissed, and he did not meet the definition of "convicted" under Labor Code section 139.21. (*Ibid.*) The court ultimately upheld that conviction because Labor Code section 139.21 "does not include an exception for cases that are later dismissed." (*Ibid.*)

Appellants challenge the Department's use of *Ahn* in their closing brief, arguing that Singh's withdrawal was made pursuant to Penal Code section 1018, while *Ahn* dealt with section 1385. (Appellants' Closing Brief, at pp. 2-3.) Appellants further argue that section 24200(d) does not have the same language as Labor Code section 139.21(a)(4)(A), which states an individual is considered to be convicted of a crime if a "judgement of conviction has been entered ... regardless of whether there is an appeal pending or whether the judgement of conviction ... has been expunged." (*Id.* at p. 3.)

While there are certainly factual differences between the present appeal and *Ahn*, the Board fails to see how those differences change the outcome of this matter. The fact remains that Singh pleaded no contest to a crime of moral

turpitude, and based on that plea, appellants faced administrative discipline in the form of license revocation. At the time of the administrative hearing, Singh met the definition of a “plea of *nolo contendere* to any public offense involving moral turpitude,” and appellants’ license was revoked accordingly. Further, *Ahn* is silent as to the timing of his expungement and the introduction of that evidence in his administrative hearing. In short, there is no indication that his expungement was “newly discovered evidence,” which explained above, is a barrier to appellants’ introduction of the same. In short, there is nothing in *Ahn* that overcomes the legal principle that new evidence must have existed at the time of the administrative hearing.

### 3. *Reconsideration*

Appellants contend that evidence of Singh’s plea withdrawal was presented to the Department within the window for reconsideration. (AOB, at pp. 13-14.) The Department has the power to order reconsideration within 30 days of the date of the administrative decision. (Gov. Code, §11521(a).) However, appellants have not shown that the Department is required by law to consider Singh’s plea withdrawal as grounds for reconsideration or reconsider its decision at all. Further, such a finding would, again, be inconsistent with the legal principle that newly discovered evidence must have existed at the time of the hearing. As discussed above, a no contest plea that is later withdrawn can still be used as the basis for administrative discipline. In short, the Board sees no error in the Department failing to reconsider its administrative decision.

### C. Penalty

Appellants contend the Department failed to consider mitigating factors when determining its penalty. (AOB, at pp. 4-6.) Appellants also argue that its penalty is punitive, which is prohibited under Rule 144.

This Board may examine the issue of excessive penalty if it is raised by an appellant. (*Joseph's of Cal. v. Alcoholic Bev. Control Appeals Bd.* (1971) 19 Cal.App.3d 785, 789 [97 Cal.Rptr. 183].) However, the Board will not disturb the Department's penalty order in the absence of an abuse of discretion. (*Martin v. Alcoholic Bev. Control Appeals Bd. & Haley* (1959) 52 Cal.2d 287, 291 [341 P.2d 296].) An administrative agency abuses its discretion when it "exceeds the bounds of reason." (*County of Santa Cruz v. Civil Service Commission of Santa Cruz* (2009) 171 Cal.App.4th 1577, 1582 [90 Cal.Rptr.3d 394, 397].) However, "[i]f reasonable minds might differ as to the propriety of the penalty imposed, this fact serves to fortify the conclusion that the Department acted within its discretion." (*Harris v. Alcoholic Bev. Control Appeals Bd.* (1965) 62 Cal.2d 589, 594 [43 Cal.Rptr. 633].)

In determining disciplinary action, the Department is required to consider the penalty guidelines incorporated in California Code of Regulations, title 4, section 144. The standard penalty for pleading no contest to a crime of moral turpitude is revocation, which is exactly the penalty appellants received. (Cal. Code Regs., tit. 4, § 144.) Nevertheless, rule 144 allows the Department to deviate from the standard penalty when, "*in its sole discretion, [it] determines*

that the facts of the particular case warrant such deviation — such as where facts in aggravation or mitigation exist.” (*Ibid.*, emphasis added.)

Factors in aggravation include prior disciplinary history, prior warning letters, licensee involvement, premises located in high crime area, lack of cooperation by the licensee in investigation, appearance and actual age of minor, and continuing course or pattern of conduct. (Cal. Code Regs., tit. 4, § 144.) Factors in mitigation include the length of licensure at the subject premises without prior discipline or problems, positive action by the licensee to correct the problem, documented training of the licensee and the employees, and cooperation by the licensee in the investigation. However, neither list of factors is exhaustive; the Department may use its discretion to determine whether other aggravating or mitigating circumstances exist. (*Ibid.*)

Here, appellant takes issue with the fact that the ALJ failed to consider that Singh “has no prior disciplinary record, and by enrolling in and successfully completing an Anger Management course, he has demonstrated proactive steps to address and remedy the underlying issue.” (AOB, at p. 5.) Appellants further argue that the fact that Singh pled no contest, rather than receiving a conviction, shows “his willingness to cooperate with the law in resolving the issue.” (*Ibid.*)

Be that as it may, the Board has said many times over the years, the extent to which the Department considers mitigating or aggravating factors is a matter entirely within its discretion. Rule 144 provides revocation as the standard

penalty for a conviction or plea involving a crime of moral turpitude, which is what appellants received. Rule 144 also allows the Department to exercise discretion to consider aggravation and mitigation. The Board cannot say the Department's rejection of appellants' mitigation evidence was unreasonable or an abuse of discretion. Further, since the penalty complies with Rule 144, it is by law not punitive and is a proper use of the Department's discretion. For these reasons, the penalty must stand.

#### **IV. CONCLUSION**

For the above reasons, the appeal is denied, and the Department's decision is affirmed.

#### **ORDER**

Pursuant to Business and Professions Code section 23085, the decision of the Department is affirmed.<sup>6</sup>

MEGAN McGUINNESS, CHAIRPERSON  
 HON. FRANK C. DAMRELL JR. (Ret.),  
 MEMBER  
 SHARLYNE PALACIO, MEMBER  
 ALCOHOLIC BEVERAGE CONTROL  
 APPEALS BOARD

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<sup>6</sup> This final order is filed in accordance with Business and Professions Code section 23088, and it shall become effective 30 days following the date of the filing of this order as provided by section 23090.7.

Any party, before this final order becomes effective, may apply to the appropriate court of appeal, or the California Supreme Court, for a writ of review of this final order in accordance with Business and Professions Code section 23090 et seq. Service on the Board pursuant to California Rules of Court (Rule 8.25) should be directed to: 400 R Street, Ste. 320, Sacramento, CA 95811 and/or electronically to: [abcboard@abcappeals.ca.gov](mailto:abcboard@abcappeals.ca.gov).

# APPENDIX

**BEFORE THE  
DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL  
OF THE STATE OF CALIFORNIA**

**IN THE MATTER OF THE ACCUSATION  
AGAINST:**

7-ELEVEN., INC. CHANDAN & SONS  
CORPORATION  
7 ELEVEN #19835F  
6015 E KINGS CANYON RD.  
FRESNO, CA 93727-3508

OFF-SALE BEER AND WINE - LICENSE

Respondent(s)/Licensee(s)  
Under the Alcoholic Beverage Control Act

FRESNO DISTRICT OFFICE

File: 20-645157

Reg: 25095542

**CERTIFICATE OF DECISION**

It is hereby certified that, having reviewed the findings of fact, determination of issues, and recommendation in the attached proposed decision, the Department of Alcoholic Beverage Control adopted said proposed decision as its decision in the case on October 1, 2025. Pursuant to Government Code section 11519, this decision shall become effective 30 days after it is delivered or mailed.

Any party may petition for reconsideration of this decision. Pursuant to Government Code section 11521(a), the Department's power to order reconsideration expires 30 days after the delivery or mailing of this decision, or if an earlier effective date is stated above, upon such earlier effective date of the decision.

Any appeal of this decision must be made in accordance with Business and Professions Code sections 23080-23089. The appeal must be filed within 40 calendar days from the date of the decision, unless the decision states it is to be "effective immediately" in which case an appeal must be filed within 10 calendar days after the date of the decision. Mail your written appeal to the Alcoholic Beverage Control Appeals Board, 400 R St, Suite 320, Sacramento, CA 95811. For further information, and detailed instructions on filing an appeal with the Alcoholic Beverage Control Appeals Board, see: <https://abcab.ca.gov> or call the Alcoholic Beverage Control Appeals Board at (916) 445-4005.

On or after November 17, 2025, a representative of the Department will contact you to arrange to pick up the license certificate.



[https://abcab.ca.gov/abcab\\_resources/](https://abcab.ca.gov/abcab_resources/)

Sacramento, California

Dated: October 7, 2025

  
Paul Tupy  
Director

**RECEIVED**

**OCT 07 2025**

**Alcoholic Beverage Control  
Office of Legal Services**

**BEFORE THE  
DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL  
OF THE STATE OF CALIFORNIA**

IN THE MATTER OF THE ACCUSATION AGAINST:

7 Eleven, Inc., and Chandan and Sons Corporation	}	File: 20-645157
Db: 7 Eleven #19835F	}	
6015 E. Kings Canyon Road	}	Reg.: 25095542
Fresno, California 93727-3508	}	
	}	License Type: 20
Respondent	}	
	}	Word Count: 8,500
	}	
	}	Reporter:
	}	Mandy Karmann
	}	Kennedy Reporters
	}	
	}	
<u>Off-Sale Beer and Wine License</u>	}	<b><u>PROPOSED DECISION</u></b>

Administrative Law Judge Alberto Roldan, Administrative Hearing Office, Department of Alcoholic Beverage Control, heard this matter, via videoconference, on August 6, 2025.

Jennifer Casey, Attorney, represented the Department of Alcoholic Beverage Control (Department).

Bruce Evans, Attorney, represented Respondent, 7 Eleven, Inc. and Prahbjot Singh represented Respondent Chandan and Sons Corporation in his capacity as its sole corporate officer (Respondents).

In the Accusation, the Department seeks to discipline the Respondents' license on the grounds that, on or about January 22, 2025, Respondent-Licensees', officer, director or person holding 10% or more of the corporate stock, namely Prahbjot Singh, was the subject of a plea, verdict or judgment of guilty or pled nolo contendere to a public offense involving moral turpitude, to-wit: corporal injury to a spouse or co-habitant in violation of Penal Code section 273.5(a), such conviction being grounds for suspension or revocation of the license under Business and Professions Code sections 23405(d) and 24200(d).<sup>1</sup>

The Department further alleged that there is cause for suspension or revocation of the license of the Respondents in accordance with section 24200 and sections 24200(a) and (b). The Department further alleged that the continuance of the license of the Respondents would be contrary to public welfare and/or morals as set forth in Article XX, Section 22 of the California State Constitution and sections 24200(a) and (b). (Exhibit D-1)

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<sup>1</sup> All statutory references are to the Business and Professions Code unless otherwise noted.

Oral evidence and documentary evidence was received at the hearing. The matter was argued and submitted for decision on August 6, 2025.

### **FINDINGS OF FACT**

1. The Department filed the Accusation on May 27, 2025.
2. The Department issued a type 20, off-sale beer and wine license to the Respondents for the above-described location on March 1, 2023 (the Licensed Premises).
3. There is no record of prior Department discipline against the Respondent's license.
4. Agent B. Ansay (Ansay) appeared and testified at the hearing. Ansay reviewed the Department base file for the Licensed Premises and determined that it contained records showing how the Licensed Premises was incorporated and who the corporate officers and shareholders were leading up to the date of January 22, 2025. The most recent ABC-243 Corporate Questionnaire filed with the Department, dated November 23, 2022, listed Prahbjot Singh (Singh) as the sole corporate officer of Chandan and Sons Corporation. The document further indicated that Singh held 100% of the corporation's stock. Singh, through the Chandan and Sons Corporation, entered into a business relationship with 7 Eleven Corporation to operate the Licensed Premises as a 7 Eleven branded business. (Exhibits D-2 and D-4) No evidence was presented that there had been any changes to the corporate structure since the application for and issuance of the Department license in this matter.
5. On January 22, 2025, in the Superior Court of Fresno County, Singh pled nolo contendere to and was found guilty of a misdemeanor violation of California Penal Code section 273.5(a) in case number F24907811. This plea occurred at a scheduled preliminary hearing after a motion to reduce the charge from a felony to a misdemeanor was granted. (Exhibit D-3)
6. Pursuant to a notice of conditional settlement, sentencing in the matter was set for January 26, 2026. Singh was subject to interim conditions as a result of the conditional settlement. Singh was required to participate in and complete a 12-week anger management program. Singh was also required to not commit any new offenses. Upon successful compliance with the interim conditions, Singh would be able to withdraw his plea and petition the court for a dismissal of the matter on January 26, 2026. At the August 6, 2025, hearing in this matter, Singh presented evidence of his compliance with the interim conditions he accepted as part of the January 22, 2025, plea. (Exhibit L-1)

### **CONCLUSIONS OF LAW**

1. Article XX, section 22 of the California Constitution and section 24200(a) provide that a license to sell alcoholic beverages may be suspended or revoked if continuation of the license would be contrary to public welfare or morals.
2. Section 23405(d) provides that the Department may "suspend or revoke any license of a corporation subject to the provisions of this section where conditions exist in relation to any

officer, director, or person holding 10 percent or more of the corporate stock of that corporation which would constitute grounds for disciplinary action against that person if the person was a licensee.”

3. Section 24200(b) provides that a licensee’s violation, or causing or permitting of a violation, of any penal provision of California law prohibiting or regulating the sale of alcoholic beverages is also a basis for the suspension or revocation of the license.

4. Section 24200(d) provides that the Department may suspend or revoke a license upon the plea, verdict, or judgment of guilty, or the plea of nolo contendere to any public offense involving moral turpitude charged against the licensee.

4. *People v. Gray* (2007) 158 Cal.App.4th 635 at page 640 noted “[o]ur Supreme Court has defined moral turpitude more broadly as a “ ‘general readiness to do evil’ ” which may, but does not necessarily, involve dishonesty. (*People v. Castro*, supra, 38 Cal.3d at p. 315)”

5. *People v. Burton* (2015) 243 Cal.App.4th 129 at page 134 established that “California courts have held that section 273.5 is a crime of moral turpitude because the statute protects individuals who are in special relationships “for which society rationally demands, and the victim may reasonably expect, stability and safety, and in which the victim, for these reasons among others, may be especially vulnerable. To have joined in, and thus necessarily to be aware of, that special relationship, and then to violate it wilfully and with intent to injure,[ ] necessarily connotes the general readiness to do evil that has been held to define moral turpitude.” (*People v. Rodriguez* (1992) 5 Cal.App.4th 1398, 1402, 7 Cal.Rptr.2d 495; accord, *People v. Martinez* (2002) 103 Cal.App.4th 1071, 1080–1081, 127 Cal.Rptr.2d 305 [evidence of witness’s pending spousal abuse charges was admissible for impeachment]; *Donley v. Davi* (2009) 180 Cal.App.4th 447, 461, 103 Cal.Rptr.3d 1 § 273.5 is a crime of moral turpitude as a matter of law.) ”

6. Cause for suspension or revocation of the Respondent’s license exists under Article XX, section 22 of the California State Constitution, and sections 24200(a) and (b), as alleged in the Accusation, on the basis that, on January 22, 2025, the Respondents held a license where an officer, director or person holding 10 percent or more of the corporate stock was convicted of a crime of moral turpitude. Singh, who in fact held 100 percent of the corporate stock of Chandan and Sons Corporation, pled nolo contendere, and was found guilty of a misdemeanor violation of Penal Code section 273.5(a), which is a crime involving moral turpitude, in violation of sections 23405(d) and 24200(d). (Findings of Fact ¶¶ 1-6)

7. On January 22, 2025, in the Superior Court of Fresno County, Singh, pled nolo contendere to and was found guilty of a misdemeanor violation of California Penal Code section 273.5(a). As noted in the *Burton* decision, this is a crime of moral turpitude. The evidence established that on January 22, 2025, Singh became subject to this disqualifying conviction and that the disqualification continued through the hearing in this matter. Singh remains convicted of a crime that is a basis for disqualifying him from holding a license in this matter. He is the 100% holder of the corporate shares of Chandan and Sons Corporation, which is a basis for disqualifying the corporation from holding the license in this matter. While it is laudable that Singh is complying

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with the terms and conditions of the conditional settlement, the possibility of a future dismissal or expungement of the charge does not change the reality that he is currently subject to sections 23405(d) and 24200(d). (Findings of Fact ¶¶ 1-6)

8. No evidence has been received that the corporation has been restructured to remove Singh from his exclusive control of the shares of Chandan and Sons Corporation. Without evidence that Singh is a less than 10% shareholder, the Respondents are subject to the statutory disqualification that extends to Singh, as an individual, pursuant to section 24200(d). (Findings of Fact ¶¶ 1-6)

9. Except as set forth in this decision, all other allegations in the Accusation and all other contentions of the parties lack merit.

### **PENALTY**

The Department requested that the Respondent's license be revoked. The Department's position was that the standard penalty under Rule 144 for conviction of a crime involving moral turpitude is revocation.

Respondent Singh, on behalf of Chandan and Sons Corporation, sought dismissal of the Accusation based on compliance with the terms of his plea agreement and the potential future dismissal of the charge in January 2026. As noted in the decision in this matter, Singh is presently subject to the consequences of the conviction. As the sole corporate officer of Chandan and Sons Corporation, Singh's personal circumstances extend to the corporation and make it subject to suspension or revocation. Counsel on behalf of 7 Eleven Corporation sought a penalty other than outright revocation for the interest in the license held by that corporation. The evidence established a moral turpitude conviction against the sole corporate officer of the corporation holding the license with 7 Eleven Corporation. The 10% threshold was established in this matter and 7 Eleven Corporation has not established a legal basis to uncouple itself from the consequences of the actions of its corporate partner, Chandan and Sons Corporation.

Rule 144<sup>2</sup> provides for a penalty of revocation for conviction of a crime involving moral turpitude in violation of section 24200(d). The penalty recommended herein complies with rule 144.

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<sup>2</sup> All rules referred to herein are contained in title 4 of the California Code of Regulations unless otherwise noted.

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**ORDER**

The Accusation is sustained. The Respondents' off-sale beer and wine license is hereby revoked.

Dated: August 20, 2025



Alberto Roldan  
Administrative Law Judge

<input checked="" type="checkbox"/> Adopt
<input type="checkbox"/> Non-Adopt: _____
By: 
Date: <u>10/01/2025</u>

**BEFORE THE  
DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL  
OF THE STATE OF CALIFORNIA**

<p>IN THE MATTER OF THE ACCUSATION AGAINST:</p> <p>7-ELEVEN., INC. CHANDAN &amp; SONS CORPORATION 7 ELEVEN #19835F 6015 E KINGS CANYON RD. FRESNO, CA 93727-3508</p> <p>OFF-SALE BEER AND WINE - LICENSE</p> <p>under the Alcoholic Beverage Control Act.</p>	<p>File: 20-645157</p> <p>Reg: 25095542</p> <p style="text-align: center;">DECLARATION OF SERVICE BY MAIL</p>
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The undersigned declares:

I am employed at the Department of Alcoholic Beverage Control. I am over 18 years of age and not a party to this action. My business address is 3927 Lennane Drive, Suite 100, Sacramento, California 95834. On October 7, 2025, I served, by CERTIFIED mail (unless otherwise indicated) a true copy of the following documents:

DECISION AND CERTIFICATE OF DECISION

on each of the following, by placing them in an envelope(s) or package(s) addressed as follows:

7-ELEVEN., INC. CHANDAN & SONS  
CORPORATION  
7 ELEVEN #19835F  
6015 E KINGS CANYON RD.  
FRESNO, CA 93727-3508

9589 0710 5270 2460 7023 78

Office of Legal Services  
Headquarters, Inter Office Mail

R. BRUCE EVANS, ATTORNEY AT LAW  
426 CULVER BLVD  
PLAYA DEL REY, CA 90293

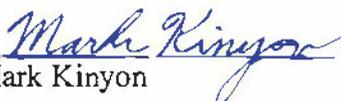
9589 0710 5270 2460 7023 92

JEFF CRAVITZ, ATTORNEY AT LAW  
1851 HERITAGE LANE, SUITE 128  
SACRAMENTO, CA 95815

9589 0710 5270 2460 7023 85

and placing said envelope or package for collection and mailing, following our ordinary business practices. I am readily familiar with this department's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, County of Sacramento, State of California, in an envelope with the postage fully prepaid. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on October 7, 2025 at Sacramento, California.

  
Mark Kinyon

FRESNO DISTRICT OFFICE (INTEROFFICE MAIL)  
 DIVISION OFFICE (INTEROFFICE MAIL)

1851 Heritage Lane, Suite 128  
Sacramento, CA 95815  
(916) 444-3971

Jeffrey S. Kravitz: Jeff@kravitzchan.com  
Paul Chan: Paul@kravitzchan.com  
www.kravitzchan.com



Kravitz & Chan, LLP

Professional License Defense Attorneys

9/9/2025

TO THE ABC

RE: 7 Eleven, Inc, and Chandan and Sons Corp. dba 7 Eleven # 19835F

File # 20-645157  
Reg: 25095542

Please take notice that the licensee has retained:

Jeff Kravitz  
Kravitz & Chan, LLC  
1851 Heritage Lane, Suite 128  
Sacramento, Ca 95815  
Ph# 916-553-4072  
Jeff@Kravitzchan.com

To represent them in this case.

Sincerely,

*Jeff Kravitz*  
Jeff Kravitz

## DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL



August 28, 2025

To all parties:

Please find enclosed a copy of the proposed decision prepared by the Administrative Law Judge ("ALJ") in this matter. This is being provided to all parties pursuant to Government Code section 11517(c)(1), and the proposed decision is hereby filed as a public record.

**PLEASE NOTE:** This proposed decision has not been adopted by the Department. The Director has up to 100 days from the date it was received from the Administrative Hearing Office to act on the proposed decision. Such action may include, among other things, adoption or rejection of the proposed decision. (See Government Code section 11517(c)(2).)

There is no provision in the Government Code that specifically authorizes parties to submit written comments to the Director regarding the proposed decision. However, there is also no restriction in the law that prohibits parties from doing so, and it is not uncommon for parties to submit such comments, identifying asserted errors or flaws in the proposed decision.

The Director is limited to reviewing the proposed decision based upon the record developed at the hearing. As such, if you do choose to send comments, the Director can only consider them to the extent that they identify alleged error based on the law and/or on the evidence presented at hearing. In addition, **any comments should be sent to the Administrative Records Secretary and must be served on all parties** (which includes the attorney representing the Department at the hearing) and be **accompanied by a proof of service** establishing that this was done. Failure to do so will result in the comments being considered an *ex parte* communication, which is prohibited pursuant to Government Code sections 11430.10, *et seq.*, and the Director will not review such comments.

Although proposed decisions are typically acted on within 30 to 60 days following receipt, action may be taken earlier than this. As such, if you do decide you wish to submit comments, you should do so promptly. Action on proposed decisions will not be delayed awaiting receipt of comments.

Whether or not comments are submitted, parties have all rights to request reconsideration (Government Code section 11521), to appeal a decision to the ABC Appeals Board, or to pursue such other legal remedies as provided by law.

Sincerely,

A handwritten signature in blue ink that reads "Mark Kinyon".

Mark Kinyon

Administrative Records Secretary  
Department of Alcoholic Beverage Control  
3927 Lennane Drive, Suite 100  
Sacramento, CA 95834

**BEFORE THE  
DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL  
OF THE STATE OF CALIFORNIA**

IN THE MATTER OF THE ACCUSATION  
AGAINST:

7-ELEVEN., INC. CHANDAN & SONS  
CORPORATION  
7 ELEVEN #19835F  
6015 E KINGS CANYON RD.  
FRESNO, CA 93727-3508

OFF-SALE BEER AND WINE - LICENSE  
  
under the Alcoholic Beverage Control Act.

File: 20-645157

Reg: 25095542

DECLARATION OF SERVICE BY MAIL

The undersigned declares:

I am employed at the Department of Alcoholic Beverage Control. I am over 18 years of age and not a party to this action. My business address is 3927 Lennane Drive, Suite 100, Sacramento, California 95834. On August 28, 2025, I served, by regular mail (unless otherwise indicated) a true copy of the following documents:

PROPOSED DECISION

on each of the following, by placing them in an envelope(s) or package(s) addressed as follows:

7-ELEVEN., INC. CHANDAN & SONS  
CORPORATION  
7 ELEVEN #19835F  
6015 E KINGS CANYON RD.  
FRESNO, CA 93727-3508

JENNIFER CASEY  
12750 CENTER COURT DRIVE, SUITE 700  
CERRITOS, CA 90703

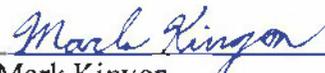
R. BRUCE EVANS, ATTORNEY AT LAW  
426 CULVER BLVD  
PLAYA DEL REY, CA 90293

MATTHEW GAUGHAN  
CHIEF COUNSEL  
3927 LENNANE DRIVE, SUITE 100  
SACRAMENTO, CA 95834

and placing said envelope or package for collection and mailing, following our ordinary business practices. I am readily familiar with this department's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, County of Sacramento, State of California, in an envelope with the postage fully prepaid. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 28, 2025 at Sacramento, California.

FRESNO DISTRICT OFFICE (INTEROFFICE MAIL)  
 DIVISION OFFICE (INTEROFFICE MAIL)

  
Mark Kinyon

**BEFORE THE  
DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL  
OF THE STATE OF CALIFORNIA**

**IN THE MATTER OF THE ACCUSATION AGAINST:** }

7 Eleven, Inc., Chandan & Sons Corporation  
Db: 7 Eleven #19835F  
6015 E Kings Canyon Rd.  
Fresno, CA 93727-3508

FILE: 20-645157  
REG: 25095542

Off-Sale Beer and Wine - License  
Under the Alcoholic Beverage Control Act.

**PROOF OF SERVICE BY MAIL  
(CCP §§ 1013(A), 2015.5)**

I, the undersigned, hereby certify as follows:

I am a citizen of the United States and employed in the County of Sacramento, California. I am over the age of eighteen (18) years and I am not a party to the above-captioned action. My business address is P.O. BOX 348210, Sacramento, CA 95834.

On July 15, 2025, I mailed from Sacramento:

**NOTICE OF HEARING BY VIDEO CONFERENCE ON ACCUSATION  
VIDEO CONFERENCE HEARING NOTICE TO PARTIES**

7 Eleven, Inc., Chandan & Sons Corporation  
Db: 7 Eleven #19835F  
6015 E Kings Canyon Rd.  
Fresno, CA 93727-3508

R. Bruce Evans, Attorney at Law  
Solomon, Saltsman & Jamieson  
426 Culver Blvd.  
Playa Del Rey, CA 90293

7 Eleven, Inc.  
Attn: Licensing Department  
PO Box 139044  
Dallas, TX 75313-9044

**{X} BY MAIL** - I served the documents by enclosing them in an envelope and: placing the envelope for collection and mailing following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

\_\_\_\_\_  
Administrative Hearing Office  
Diana Villanueva

OLS (Inter-Departmental Mail)  
 Fresno District Office (Inter-Departmental Mail)



Paul Tupy  
Director



Gavin Newsom  
Governor

Department of Alcoholic Beverage Control  
Administrative Hearing Office  
P.O. BOX 348210  
Sacramento, CA 95834-8210

August 25, 2025

In the Matter of the Accusation Against:

7 Eleven, Inc., and Chandan and Sons Corporation  
Dbas: 7 Eleven #19835F  
6015 E. Kings Canyon Road  
Fresno, California 93727-3508

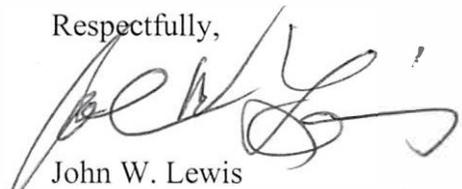
File: 20-645157  
Reg: 25095542

Director, Department of Alcoholic Beverage Control,

Enclosed is the Proposed Decision resulting from the hearing before the Department of Alcoholic Beverage Control, Administrative Hearing Office in the above-entitled matter.

This Proposed Decision is submitted for your review and action.

Respectfully,



John W. Lewis  
Chief Administrative Law Judge

RECEIVED

AUG 26 2025

Alcoholic Beverage Control  
Administrative Records Office

1851 Heritage Lane, Suite 128  
Sacramento, CA 95815  
(916) 444-3971

Jeffrey S. Kravitz: Jeff@kravitzchan.com  
Paul Chan: Paul@kravitzchan.com  
www.kravitzchan.com

September 17, 2025

To: Paul Tupy  
Director of the ABC  
Via:  
Mark Kinyon  
Administrative Records Secretary  
Department of Alcoholic Beverage Control  
3927 Lennane Drive, Suite 100  
Sacramento, Ca 95834  
Email: Mark.Kinyon@abc.ca.gov

RE: 7 Eleven Inc, and Chandan and Sons Corporation dba 7 Eleven #  
19835F  
File # 20-645157  
Reg: 25095542

Comments on proposed decision dated August 20, 2025

Dear Director Tupy:

It is respectfully requested that the ABC reject the proposed decision of the ALJ that imposed the draconian discipline of revocation of license # 20-645157.

The decision misstates the laws and the facts and fails to follow the policies of the ABC concerning license discipline.

The case derives from the fact that Prahbjot Singh, an officer of the licensed entity, entered a plea of "no contest" to a misdemeanor charge of violating Penal Code 273.5(a) on January 22, 2025.

However, it is crucial to understand that Mr. Singh has never been found guilty of the offense or convicted and never will be.



Kravitz & Chan, LLP

Professional License Defense Attorneys

RECEIVED

SEP 17 2025

Alcoholic Beverage Control  
Administrative Records Office

Mr. Singh entered a plea based on a conditional settlement of the case that will see the case dismissed on January 26, 2026. The settlement requires Mr. Singh to complete an anger management course. He has now completed this course. (Exhibit A.)

The completion certificate is dated September 2, 2025, and was therefore not available at the time of the hearing held on August 6, 2025. Pursuant to Cal. Gov't Code § 11522 allows the ABC to review additional evidence on a Petition for Reconsideration. As such reviewing it now would be in the interests of justice.

### THE PROPOSED DECISION MISTATES FACTS AND LAW

The ALJ proposed decision incorrectly states under the heading Findings of Fact # 5:

“Singh pled nolo contendere and was found guilty of a misdemeanor violation of California Penal Code section 273.5(a)...”

There is no factual basis for this statement. Mr. Singh was not found guilty. There was no evidence presented at the hearing that the Court made any finding of guilt. Mr. Singh was not convicted, he was not put on probation, he entered a conditional settlement that will result in all charges being dismissed.

This factual error is compounded in the ALJ proposed decision section Conclusions of Law.

Here in paragraph 6, the ALJ states that Cause for discipline exists because Singh “was found guilty of a misdemeanor violation of Penal Code section 273.5(a) which is a crime involving moral turpitude in violation of sections. 23405(d) and 24200(d).”

This legal conclusion has no basis in fact. There is no evidence that the Court found Mr. Singh guilty

Paragraph 7 of the Conclusion of Law misstates both the law and facts:

“On January 22, 2025, in the Superior Court of Fresno County, Singh, pled nolo contendere to and was found guilty of a misdemeanor violation of California Penal Code section 273.5(a) as noted the Burton decision, this is a crime of moral turpitude. The evidence established that on January 22, 2025, Singh became subject to this disqualifying conviction and that the disqualification continued through the hearing in this matter. Singh remains convicted of a crime that is the basis for disqualifying him from holding a license in this matter. He is the 100% holder of the corporate shares of Chandan and Sons Corporation, which is the basis for disqualifying the corporation from holding the license in this matter. While it is laudable that Singh is complying with the terms and conditions of the conditional settlement, the possibility of a future dismissal or expungement of the charges does not change the reality of this currently subject to sections 23405(d) and 24200(d)”

Singh has never been found guilty, he has never been convicted, he does not have a disqualifying conviction, and he cannot remain convicted of something he was never convicted of.

These factual errors alone should compel the Director to reject the decision.

#### THE PROPOSED DECISION FAILS TO REVIEW MITIGATION FACTORS

Moreover, the use of the term “disqualifying” is incorrect. The rules do not “disqualify” a person, rather they state a basis for discipline.

Using the actual facts of the case, the basis for discipline is not a “conviction” but rather that a plea of “no contest” was entered. Business and Professions Code § 24200 subd. (d) allows for the suspension or revocation of license for: The plea, verdict, or judgment of guilty or the plea of nolo contendere to any public offense involving moral turpitude....

However, despite what the ALJ believes the fact that discipline can be imposed does not mean that revocation must be imposed. Rule 144 and the Disciplinary Guidelines explain that higher or lower penalties from this schedule may be recommended based on the facts of individual cases where generally supported by aggravating or mitigating circumstances.

The guidelines explain:

**Mitigating factors may include, but are not limited to:**

- Length of licensure at subject premises without prior discipline or problems
- Positive action by a licensee to correct a problem
- Documented training of a licensee and employees
- Cooperation by a licensee in investigation
- 

Accordingly, the ALJ statement that Mr. Singh's compliance with the conditional settlement of his criminal case is "laudable" fails to understand that Mr. Singh's compliance is a factor in mitigation to be considered. The ALJ did not consider any of the factors stated in the guidelines. Mr. Singh has no prior disciplinary history and by taking and completing the Anger Management course, he has taken positive action to correct the problem.

The ALJ incorrectly determined that Mr. Singh had suffered a "disqualifying" conviction and therefore revoked the license believing that this was the only possible remedy.

The fact that there is not a conviction or finding of guilt here is another factor in mitigation. While the ABC can discipline a license for the plea of "no contest" it is not logical to believe that the discipline to be imposed should be the same even though he will never be convicted. He has shown himself to be cooperating with the law in remedying the problem.

**THE REVOCATION IS PUNITIVE AND DOES NOT MEET THE GOAL OF PUBLIC PROTECTION**

"[T]he disciplining of licensees such as the petitioners herein is for the protection of the public in the exercise of the police power and not for the purpose of punishing any licensee." (*Copeland v. ABC*, (1966) 241 Cal.App2d 186,188.)

The ABC must always focus on the protection of the public and not any punitive goal of punishing the licensee.

“The board's discretion under section 22 [of the California Constitution], however, is not absolute but must be exercised in accordance with the law, and the provision that it may revoke a license “for good cause” necessarily implies that its decisions should be based on sufficient evidence and that it should not act arbitrarily in determining what is contrary to public welfare or morals. “ (*Schaub's Inc. v. Department of Alcoholic Beverage Control*, (1957) 153 Cal.App.2d 858.)

In general California Courts disfavor the outright revocation of a license when a lesser discipline such as a suspension is available. Revocation is considered a “drastic penalty”. (*Pirouzian v. Superior Court*, (2016) 1 Cal. App.5<sup>th</sup> 438, 446.)

The penalty guidelines make a distinction between crimes of moral turpitude committed on or off the premises. Any crime of moral turpitude committed on the premises has a discipline recommendation of revocation. For crimes committed off the premises, the guidelines distinguish between petty theft/shoplifting which has a recommendation of stayed revocation and all other off-premises crimes which are disciplined by a recommended revocation.

This distinction between types of offenses should not be considered exhaustive and has no known explanation. Petty theft and shoplifting are crimes of moral turpitude that are inherently dishonest. There is no rational explanation as to why someone who committed such a crime would be allowed to keep a license while Mr. Singh, who committed an act of domestic violence, an act that is only understood to be one of moral turpitude through a complex review of case law, would have their license revoked.

Accordingly, the fact that the offense occurred off the premises and is not a crime of dishonesty, should be reviewed as further mitigating factors. If the goal is not to punish the licensee but to protect the public, a nexus between the alleged offense and the discipline must be shown.

Accordingly, it is requested the Director reject the ALJ decision as it misstates both the facts and the law. There is no "disqualifying conviction." The ABC should consider the factors in mitigation required by the policy guidelines and issue a discipline less than revocation such as a suspension.

Sincerely,

*Jeff Kravitz*

Jeff Kravitz

# EXHIBIT A

# CERTIFICATE OF COMPLETION

---

This Certificate is presented to

**Prabhjot Singh**

IN RECOGNITION OF SUCCESSFUL COMPLETION OF THE  
12-WEEK ANGER MANAGEMENT PROGRAM

**Family & Behavior Intervention Services**

*Dedicated to the Treatment, Education, and Prevention of Destructive Behavior and Lifestyles*

Bernardina Marcelo .MS., C.D.V.F., C.A.M.F..

Bernardina Marcelo .MS., C.D.V.F., C.A.M.F..

09/02/2025

Date

PROOF OF SERVICE:

CASE: RE: 7 Eleven Inc, and Chandan and Sons Corporation dba 7 Eleven # 19835F

File # 20-645157

Reg: 25095542

I am a citizen of the United States and a resident of the County of Sacramento; I am over the age of eighteen years and not a party to the above-mentioned action. My business address is 1851 Heritage Lane, Suite #128, Sacramento, CA 95815

On the date of 9/17/2025, I served the following:

documents:

Comments on proposed decision dated August 20, 2025

By email

Mark.Kinyon@abc.ca.gov

Joseph.Scolerilll@abc.ca.gov

Matthew.Gaughan@abc.ca.gov

bevans@ssjlaw.com

I declare under the penalty of perjury that the foregoing is true and correct. Executed on this day 9/17/2025 at Sacramento, California.

*Jeff Kravitz*

Jeff Kravitz