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

AB-10034
File: 21-363358; Reg: 24094730

Rajaa W. Abdullatif and Rimoun Ibrahim Makhlouf
dba JJ Liquor
311 Castillo Street
Santa Barbara, CA 93101
Appellants/Licensees

v.

Department of Alcoholic Beverage Control,
Respondent

Administrative Law Judge at the Dept. Hearing: Hon. Matthew G. Ainley

Appeals Board Hearing: October 9, 2026, at 10:00 a.m.
Sacramento, CA/Videoconference

ISSUED OCTOBER 14, 2026

Appearances: Matthew J. Norris, as Counsel for Appellants

Joseph J. Scoleri III, as Counsel for the Department

OPINION

I. INTRODUCTION

Rajaa W. Abdullatif and Rimoun Ibrahim Makhlouf, doing business as JJ Liquor (appellants), appeal from a decision of the Department of Alcoholic Beverage Control (Department) suspending their off-sale general license for 15 days. The Department found that, on June 20, 2024, appellants, through Uber Eats delivery driver Andi Rexha, furnished an alcoholic beverage to Berenice Gomez Chavez, a 19-year-old minor decoy, in violation of Business and Professions Code

section 25658, subdivision (a)[1]. (Decision, Findings of Fact ¶¶ 4, 6–9; Conclusions of Law ¶ 5; Order.)

Appellants contend that the transaction did not constitute a completed delivery or furnishing of alcohol and that Rexha's conduct cannot be attributed to them merely because he acted as their delivery agent. They also challenge the Department's rejection of Rexha's testimony that he attempted to retrieve the alcohol after the Uber Eats application identified Chavez as underage. (Appellants' Opening Brief, pp. 5–10.) Appellants further contend that the operation failed to satisfy the fairness requirement of California Code of Regulations, title 4, section 141.1 (Rule 141.1), and that the Department's findings are unsupported by substantial evidence in light of the whole record. They seek reversal and dismissal of the accusation or, alternatively, remand for further findings and proceedings. (*Id.* at pp. 20–24.)

For the reasons explained below, the Department's decision is affirmed.

II. FACTS AND PROCEDURAL HISTORY

A. The Licensed Premises and Delivery Operations

Appellants hold a type 21, off-sale general license for JJ Liquor, located at 311 Castillo Street in Santa Barbara. The Department issued the license on April 18, 2000. The premises is near the beach, hotels, and a community college. Appellants' license has been the subject of three prior final disciplinary matters

[1] All further statutory references are to the Business and Professions Code unless stated otherwise.

involving violations of Business and Professions Code section 25658, subdivision (a), each resulting in a 15-day suspension. The accusations in those matters were filed in 2002, 2013, and 2018. (Findings of Fact (Findings), ¶¶ 2–3, 14; RT I, p. 8, lines 1–9.)

JJ Liquor accepts orders through third-party delivery services, including Uber Eats, Grubhub, and DoorDash. An incoming Uber Eats order appears on the store's point-of-sale system, sounds an alert, and generates a printed order identifying the customer and the items requested. A cashier gathers the items for collection by a delivery driver. Makhlouf confirmed that appellants engaged Uber Eats to deliver alcoholic beverages sold by the store. (RT II, p. 22, lines 3–9; pp. 32–33; p. 66, lines 1–7.)

John Helou, the store's manager, and Madelyn Mendez Diaz, a cashier who began working at the premises in May 2024, described the store's efforts to prevent sales to minors. Helou testified that his training emphasized checking identification and refusing sales to minors, and that he subsequently completed the Department's Licensee Education on Alcohol and Drugs training. He also trained Mendez. Mendez described instruction in examining identification, detecting false identification, and refusing a sale when a customer appeared too young. (RT II, pp. 25–27, 50–52.)

Mendez testified that delivery drivers were required to present identification establishing that they were over 21 before receiving an order. She also described instructions to drivers to check the recipient's identification and return alcoholic beverages if the recipient was underage or intoxicated. Helou testified that

appellants did not control a driver's actions after the driver left the premises and did not authorize drivers to furnish alcohol to minors. (RT II, pp. 28–30; p. 65, lines 1–5; p. 69, lines 9–25.)

B. The June 20, 2024 Transaction

On June 20, 2024, Department agents conducted a delivery decoy operation using Berenice Gomez Chavez, who was then 19 years old. Agent Michael Gonzalez placed an Uber Eats order with JJ Liquor for a 24-ounce can of Modelo beer. Chavez waited outside a hotel in Goleta while Department agents observed from vehicles in the parking lot. She carried her California driver's license, which was vertically oriented, displayed her September 3, 2004 birthdate, and bore the statement "AGE 21 IN 2025." (RT I, p. 21, lines 7–16; pp. 23–25; p. 45, lines 17-25; Dept. Exh. D6; Findings, ¶¶ 4, 6–8.)

Mendez prepared the order at the store and gave it to Uber Eats driver Andi Rexha. She testified that she was "pretty sure" she had requested and received his identification and that she followed her usual identification-checking procedure. She was certain he was over 21. The ALJ found that she checked Rexha's identification before releasing the beer to him. (RT II, pp. 35–37; Findings, ¶ 17.)

Chavez testified that Rexha requested her identification, scanned it with his telephone, and handed her the alcohol. She then returned to the agents' vehicle. Her recollection of other details was limited. She could not remember whether Rexha asked her age, what he said after examining her identification, whether his

telephone emitted an audible alert, or what happened to him as she returned to the vehicle. (RT I, p. 25, lines 16–24; pp. 38–41.)

Agent Sovantana Tan testified that he observed the interaction from the parking lot. According to Tan, Rexha handed Chavez a bag containing the beer, obtained and scanned her identification, returned the identification, and walked away. Tan could not hear their conversation. He estimated that Rexha's interaction with the identification lasted three to four seconds. Chavez walked toward an agents' vehicle, and Tan contacted Rexha near Rexha's vehicle, identified himself as a police officer, and advised him that he had furnished alcohol to a 19-year-old. (RT I, p. 48, lines 1–23; p. 49, lines 1–11.)

Rexha later gave a different account of the events following the handoff. He testified that, when he approached Chavez, he had his telephone in one hand and the beer in the other. He exchanged the beer for her identification, scanned the identification, returned it, and turned toward his vehicle while assuming the recipient would be of legal age. According to Rexha, the application was still processing the scan and then notified him that Chavez was underage. He testified that he turned around and repeatedly called to her to wait so he could recover the beer, but she continued walking rapidly toward a vehicle. Department agents then approached his vehicle. (RT II, p. 109, lines 19–25; p. 110, lines 1–25.)

Supervising Agent Alberto Villanueva disputed that account. He testified that he observed the handoff from a vehicle approximately 15 to 20 yards away,

with the windows down and an unobstructed view. After Chavez received the beer, he saw Rexha walk toward his vehicle. Villanueva neither heard Rexha call to Chavez nor saw him attempt to shout or signal her. On cross-examination, Villanueva acknowledged that his attention was directed toward Chavez as she walked back to the agents' vehicle. (RT II, p. 123, lines 9–25; p. 124, lines 1–25; p. 125, lines 1–4, 13–25; p. 126, line 1.)

The agents cited Rexha, and the beer was subsequently returned to him. Rexha testified that an agent gave him the can while preparing the citation and that he followed the application's instructions to return it to JJ Liquor. Tan likewise testified that he returned the beer to Rexha and advised him to take it back to the store. (RT I, p. 59; RT II, pp. 115–116.)

Department agents then visited JJ Liquor and spoke with Mendez. Tan testified that he advised her that an Uber Eats driver had furnished alcohol to the decoy and asked about the store's delivery-ordering system. He photographed the register display showing the order. Mendez testified that she was frightened by the encounter and denied having sold alcohol to a minor. While the agents were at the premises, Rexha returned and gave the beer to Mendez. (RT I, pp. 51–55; RT II, pp. 38–40; Findings, ¶¶ 10–11, 18.)

C. The Administrative Proceedings

The Department filed a single-count accusation on September 20, 2024, alleging that appellants, through their agent or employee Rexha, sold, furnished, or gave an alcoholic beverage to Chavez in violation of Business and Professions

Code section 25658, subdivision (a). Appellants' notice of defense denied the accusation and identified, among other defenses, failure to comply with minimum standards governing minor decoys, reliance on evidence of majority and identity, and entrapment. (Dept. Exh. D1, Accusation, count 1; Notice of Defense, pp. 1–2.)

Administrative Law Judge Matthew G. Ainley began the hearing by videoconference on June 11, 2025. Appellants requested a continuance because an Uber representative had not appeared in response to a subpoena and appellants had been unable to secure Rexha's attendance. Over the Department's objection, the ALJ allowed the Department to present its case and continued appellants' case so they could pursue enforcement of the Uber subpoena and arrange for their witnesses to appear. The ALJ also permitted appellants to recall Department witnesses through the appropriate process. Chavez and Tan testified during the first hearing session. (RT I, pp. 10–14, 20–61.)

The hearing resumed on November 12, 2025. Appellants' counsel stated that appellants were prepared to proceed, without conceding that the subpoena issue had been resolved. Appellants presented testimony from Makhlouf, Mendez, Helou, and Rexha. The Department did not cross-examine Rexha and called Villanueva in rebuttal. (RT II, p. 6, lines 12–23; pp. 11–12, 23–24, 49; p. 119, lines 21–25; p. 120, lines 6–16.)

The evidence addressed both the ordering process and the instructions governing delivery. Helou identified Uber materials describing identification

checks, prohibiting delivery to persons under 21, and providing for cancellation and return of an order when delivery could not lawfully be completed. The ALJ admitted appellants' Exhibits R1 through R3, containing those materials, as administrative hearsay. (RT II, pp. 56–63; p. 91, lines 3–25; p. 93, lines 4–9.)

Helou also described creating a personal Uber Eats account while investigating the incident. When he attempted to order alcohol, the application required him to upload identification for age verification and informed him that the courier would verify his age by scanning his identification at delivery. The ALJ admitted screenshots from Helou's account as Exhibits R12 and R14. (RT II, p. 71, lines 20–25; pp. 72–78; p. 94, lines 18–25; p. 95, lines 1–6.)

The parties also addressed the customer information associated with the transaction. The store display photographed by Tan identified the customer as Berenice C. and showed the order as canceled. Helou testified that records he retrieved through the Uber Eats managerial website identified the customer for the same transaction as Alex S. He explained that the application permitted a customer to change the displayed name and that the cashier could not access the managerial information from the ordinary point-of-sale display. The ALJ admitted the transaction screenshots, Exhibits R7 through R9, without limiting their admission to administrative hearsay. (RT II, pp. 79–87; p. 94, lines 5–17; Findings, ¶ 23.)

Rexha testified that he had continued working for Uber and had not been barred from delivering alcohol. He also testified that he had appeared in court

following the citation, had not been convicted of any offense arising from the incident, and had no proceedings pending against him. The ALJ sustained objections to questions seeking further details about the criminal proceeding. (RT II, pp. 99–100, 116–118.)

Following oral argument, the matter was submitted on November 12, 2025. Appellants disputed that the transaction constituted a completed delivery, challenged their responsibility for Rexha's conduct, and relied on the ordering process, identification scan, underage notification, and alleged recovery effort. The Department maintained that Rexha had furnished the beer to Chavez while completing a delivery for appellants and requested a 15-day suspension. (RT II, pp. 126–138; Decision, Conclusions of Law, ¶¶ 6–11.)

D. The Department's Decision and Appeal

On March 10, 2026, the ALJ issued a proposed decision sustaining the accusation and recommending a 15-day suspension. The ALJ found that Chavez displayed the appearance generally expected of a person under 21 under the circumstances presented to Rexha. The ALJ also found that Rexha scanned Chavez's identification, returned it, and handed her the beer, after which she walked to the agents' vehicle. (Findings, ¶¶ 7–9, 13; Decision, p. 7.)

The ALJ rejected appellants' contention that no delivery occurred because an adult agent placed the order or because the application ultimately identified Chavez as underage. The decision emphasized that Chavez was the intended recipient, that her name appeared on the store's display, and that Rexha

provided the alcohol to her. In resolving the disputed recovery testimony, the ALJ rejected Rexha's account as "self-serving" and not credible, and expressly accepted Villanueva's contrary testimony. (Conclusions of Law, ¶¶ 6–8 & fn. 5.)

The ALJ further concluded that Rexha was appellants' agent under Rule 141.1 because appellants used Uber Eats to deliver alcoholic beverages sold through their licensed business. The decision rejected appellants' reliance on their asserted lack of control over Rexha and on policies prohibiting delivery to minors, concluding that appellants' responsibility for the lawful exercise of their license privileges was nondelegable. (Conclusions of Law, ¶¶ 9–11.)

In selecting the penalty, the ALJ characterized the violation as typical, regarded the prior disciplinary matters as remote, and found no aggravating or mitigating circumstances. The ALJ recommended the 15-day suspension requested by the Department under Rule 144, noting that appellants had not proposed an alternative penalty if the accusation were sustained. (Decision, p. 7.)

The Department adopted the proposed decision on April 20, 2026.[2] The certificate of decision was dated April 21, 2026, and the decision and certificate were mailed that day. Appellants appealed, seeking reversal and dismissal of the accusation or, alternatively, remand for further findings and proceedings. The Department requests affirmance. (Certificate of Decision, Apr. 21, 2026; Declaration of Service by Mail, Apr. 21, 2026; AOB, p. 24; Reply Br., pp. 2, 14.)

[2] The Department's decision is set forth in the appendix.

III. STANDARD OF REVIEW

The Board's scope of review is defined by Business and Professions Code section 23084 and is further informed by the California Constitution, statute, and relevant appellate authority. (Cal. Const., art. XX, § 22; Bus. & Prof. Code, §§ 23083, 23085.) When reviewing the Department's decision, the Board determines whether the Department proceeded in the manner required by law, whether the decision is supported by the findings, and whether the findings are supported by substantial evidence in light of the whole record. (Bus. & Prof. Code, § 23084, subds. (b)–(d).)

Substantial evidence is evidence that a reasonable mind might accept as adequate to support a conclusion—evidence that is "reasonable in nature, credible, and of solid value." (*County of San Diego v. Assessment Appeals Bd. No. 2* (1983) 148 Cal.App.3d 548, 555, quoting *Ofsevit v. Trustees of California State University and Colleges* (1978) 21 Cal.3d 763, 773, fn. 9; see also *Hosford v. State Personnel Bd.* (1977) 74 Cal.App.3d 302, 307.) The Board may not independently reweigh the evidence or substitute its judgment for that of the Department. (*Kirby v. Alcoholic Beverage Control Appeals Bd.* (1970) 7 Cal.App.3d 126, 129; *Reimel v. Alcoholic Beverage Control Appeals Bd.* (1967) 255 Cal.App.2d 40, 43; *Harris v. Alcoholic Beverage Control Appeals Bd.* (1963) 212 Cal.App.2d 106, 113–114.) All conflicts in the evidence must be resolved in favor of the Department's decision, and the Board must accept all reasonable inferences supporting that decision. (*Harris*, *supra*, at p. 113.)

Even where error is shown, the Board may not reverse unless appellants demonstrate that the error was prejudicial. (*Reimel v. House* (1969) 268 Cal.App.2d 780, 787.) Under the California Constitution, a decision may be set aside only if the error resulted in a miscarriage of justice. (Cal. Const., art. VI, § 13; see *Leal v. Gourley* (2002) 100 Cal.App.4th 963, 968.)

IV. ANALYSIS

A. Appellants Preserved Their Arguments Concerning Rule 141.1

The Department contends that appellants forfeited all arguments concerning Rule 141.1 because they did not expressly invoke the regulation during the administrative proceedings. It emphasizes that appellants' closing argument did not mention the rule by number and that appellants subsequently submitted neither comments objecting to the proposed decision on that basis nor a request for reconsideration. (Department's Reply Brief, pp. 6–7.) The record does not support the Department's contention.

An issue ordinarily must be presented in the administrative proceeding before it may be raised on appeal. (*City of Oakland v. California Public Employees' Retirement System* (2002) 95 Cal.App.4th 29, 52–53; *Reimel v. House* (1968) 259 Cal.App.2d 511, 515.) This requirement affords the opposing party an opportunity to address the issue and the administrative tribunal an opportunity to resolve it. (*Harris v. Alcoholic Beverage Control Appeals Board* (1961) 197 Cal.App.2d 182, 186–187.) Here, appellants presented the substance of the

arguments they now advance concerning the delivery operation, even though their counsel did not identify Rule 141.1 by number in closing argument.

Appellants' notice of defense expressly identified "failure to comply with minimum standards regarding minor decoys" as an affirmative defense. (Department's Exh. 1, Notice of Defense, p. 2, lines 1–6.) Their presentation at the hearing went beyond that general assertion. During closing argument, counsel disputed whether a delivery had occurred, relying on the application's underage notification, Rexha's asserted attempt to recover the beer, and the absence of a delivery to the agent who placed the order. (RT, vol. II, p. 128, lines 8–25; p. 130, lines 1–16.) Counsel also challenged the agents' use of the ordering system, the discrepancy between the account and recipient names, and the use of an adult to place an order that counsel maintained the minor could not have placed herself. (*Id.*, p. 129, lines 1–24.) These are the circumstances appellants now invoke in support of their delivery and fairness arguments. (Appellants' Opening Brief, pp. 15–16, 20–21.)

Appellants likewise disputed the Department's agency theory. Counsel referred to the regulation promulgated during the COVID emergency and argued that appellants lacked control over the driver after he left the premises and had not authorized him to furnish alcohol to a minor. (RT, vol. II, p. 131, lines 2–25; p. 132, lines 1–23.)

The Department understood and answered these arguments. In response to appellants' objections concerning the ordering process and account information, Department counsel expressly argued that the requirements governing a delivery-decoy operation were those set forth in Rule 141.1 and that the asserted name change was irrelevant. (RT, vol. II, p. 135, lines 7–25.) The adopted decision also expressly invoked Rule 141.1 and addressed appellants' delivery and agency theories. (Conclusions of Law ¶¶ 4, 6–11.)

The authorities cited by the Department do not require a different result. In *Reimel*, the Board considered a regulatory-validity issue that the licensee had not raised and that both parties' presentations had assumed away. (*Reimel*, *supra*, 259 Cal.App.2d at p. 515.) In *Harris*, the licensee admitted the charges, causing the Department to refrain from presenting its witnesses, and the Board nevertheless considered a new "included offense" theory. (*Harris*, *supra*, 197 Cal.App.2d at pp. 186–187.) Here, the challenged aspects of the operation were identified and contested before the ALJ.

We therefore reject the Department's contention that appellants forfeited their arguments merely by failing to cite Rule 141.1 expressly. The absence of later comments or a request for reconsideration does not establish that these arguments were first advanced on appeal. Our conclusion is limited to the delivery, agency, and fairness arguments actually presented; it does not treat a general reference to minor-decoy standards as preserving every conceivable regulatory objection. We address the preserved arguments on their merits below.

B. Substantial Evidence Supports the Finding That Rexha Furnished Alcohol to the Minor Decoy

Appellants contend that the evidence does not establish a completed delivery because the Uber Eats application identified Chavez as underage, Rexha attempted to recover the beer, and the beer ultimately was returned to the licensed premises. They argue that the Department treated the physical handoff as conclusive without adequately considering the transaction as a whole. (Appellants' Opening Brief, pp. 15–16.) The Department responds that Rexha furnished alcohol within the meaning of Business and Professions Code section 25658, subdivision (a), when he handed the beer to the 19-year-old decoy and they walked away from one another. (Department's Reply Brief, p. 8.)

We begin with the Department's adopted findings. The Department found that Agent Gonzalez ordered a can of Modelo beer from appellants' premises through Uber Eats; Rexha brought the beer to Chavez, who was 19 years old; and Rexha handed her the beer, after which she walked to an agents' vehicle. (Findings of Fact ¶¶ 4, 6–9.) It further found that the order displayed on appellants' register identified the recipient as Berenice C. and concluded that Rexha delivered the beer to the intended recipient. (Finding of Fact ¶ 11; Conclusions of Law ¶¶ 7–8.)

Our task is to determine whether the material findings are supported by substantial evidence in light of the whole record and whether they support the Department's legal conclusion. We do not independently reweigh the evidence

or replace a supported finding merely because another finding also would have been reasonable. (*Boreta Enterprises, Inc. v. Department of Alcoholic Beverage Control* (1970) 2 Cal.3d 85, 94–95.)

The evidence supports the finding that Rexha transferred the beer to Chavez. Although Chavez could not recall several details of the encounter, she testified that Rexha handed her the alcohol and that she then returned to an agent's vehicle. (RT, vol. I, p. 40, lines 1–18.) Agent Tan likewise testified that he saw Rexha hand Chavez the bag containing the beer and that Chavez subsequently walked toward an agent's vehicle. (*Id.*, p. 48, lines 7–23.)

Rexha's own testimony confirms that transfer. He explained that he held his phone in one hand and the beer in the other. When Chavez handed him her identification, he handed her the beer and scanned the identification. He then returned the identification and turned toward his car, assuming the application would confirm that she was of legal age. According to Rexha, the application continued processing before displaying the underage notification; by then, Chavez was walking toward a vehicle with the beer. (RT, vol. II, p. 109, lines 19–25; p. 110, lines 1–4.)

The witnesses differed concerning the sequence of the handoff and identification scan. Chavez placed the handoff after the scan, consistent with the sequence stated in the findings, while Tan and Rexha placed it before the scan. (RT, vol. I, p. 39, lines 17–25; p. 40, lines 1–3; p. 48, lines 7–13; RT, vol. II, p. 109, lines 19–23.) That difference does not undermine the material finding that Rexha

handed Chavez the beer and that she walked away with it. Each account supports that finding.

Section 25658, subdivision (a), prohibits selling, furnishing, or giving an alcoholic beverage to a person under 21. Furnishing is a basis for a violation independent of a completed sale. Here, Rexha physically provided the beer to Chavez and relinquished possession of it to her. The application's subsequent rejection of the transaction did not prevent that furnishing from occurring.

Rule 141.1(b) does not impose a different requirement. For purposes of the regulation, delivery encompasses a transfer of alcoholic beverages by a licensee, employee, or agent to a person under 21 pursuant to an order placed remotely. It does not condition delivery on the application recording a successful transaction. The evidence established that the beer was ordered through Uber Eats, collected from appellants' premises, and brought to Chavez in fulfillment of that order. (Findings of Fact ¶¶ 6–9, 17; RT, vol. I, p. 45, lines 14–25.) Whether Rexha's conduct is attributable to appellants under the regulation's agency provision is addressed in the following section.

Agent Tan's acknowledgment that delivery to Agent Gonzalez was never completed does not defeat the finding. The question expressly concerned delivery to Gonzalez, the adult who placed the order. (RT, vol. I, p. 60, lines 7–9.) Tan did not retract his testimony that Rexha handed the beer to Chavez. The regulation does not require the person placing the order and the minor receiving the alcohol to be the same person. The different account and recipient names

therefore do not negate the transfer pursuant to the order. Appellants' separate challenge to the fairness of the ordering process is addressed below.

The evidence concerning attempted recovery and the eventual return of the beer also does not establish that no furnishing occurred. Rexha described his asserted effort to call Chavez back as a response to the underage notification, after he had handed her the beer and she was walking away. (RT, vol. II, p. 109, lines 19–25; p. 110, lines 1–22.) Thus, his account itself places the transfer before the asserted recovery effort. The Department rejected his testimony that he attempted to reclaim the beer, a credibility determination we examine separately. (Conclusion of Law ¶ 8, fn. 5.)

The Department also expressly acknowledged that the agents returned the beer to Rexha and that he returned it to the store, where it was placed back in stock. (Findings of Fact ¶¶ 9, 18.) That later return was consistent with the testimony of both Tan and Rexha. (RT, vol. I, p. 60, lines 1–5; RT, vol. II, p. 115, lines 11–25; p. 116, lines 1–4.) It did not undo the preceding act of furnishing the beer to Chavez.

Considering the evidence supporting and qualifying the witnesses' accounts, substantial evidence supports the Department's material findings concerning the transfer. Those findings establish that Rexha furnished an alcoholic beverage to a person under 21 within the meaning of section 25658, subdivision (a).

C. Rexha Acted as Appellants' Agent in Delivering the Alcohol

Appellants distinguish authority to deliver alcohol from authority to furnish it unlawfully to a minor. They acknowledge that Rule 141.1(c) broadly defines a delivery driver as a licensee's agent, but argue that the Department could not impose discipline without finding that they authorized, directed, or encouraged Rexha's unlawful conduct. They emphasize their policies against furnishing alcohol to minors and their lack of control over Uber Eats' policies and Rexha's actions after he left the premises. (Appellants' Opening Brief, pp. 11–14, 17.) The Department responds that appellants remain administratively responsible for the delivery of alcohol sold through their licensed business, even when they use a third party to perform that delivery. (Department's Reply Brief, pp. 8–10.)

Rule 141.1(c) defines an agent, for purposes of delivery-decoy enforcement, to include a person or entity the licensee uses to deliver alcoholic beverages ordered remotely, including a third-party delivery person or service, even if not an employee of the licensee. The definition applies directly to the relationship established by the Department's findings.

The Department found that appellants used Uber Eats and other delivery services to fulfill orders from their premises. Their clerk received the order at issue, prepared the beer for pickup, and gave it to Rexha after checking his identification. Rexha then transported the beer to Chavez. (Findings of Fact ¶¶ 6–9, 16–17, 21.) Those findings are supported by the clerk's testimony that she responded to the Uber order by bagging the beer, giving it to Rexha, and

watching him leave with it, together with Rexha's testimony describing his subsequent handoff to Chavez. (RT, vol. II, p. 35, lines 19–22; p. 36, lines 8–25; p. 37, lines 1–6; p. 109, lines 19–25.) Appellants thus used Rexha to perform the delivery contemplated by their acceptance and preparation of the order. He was their agent within the meaning of Rule 141.1(c).

Appellants' argument concerning authorization of the unlawful act presents a separate question, but it does not defeat administrative responsibility here. Proceedings to discipline an alcoholic beverage license are administrative proceedings directed toward protection of the public, rather than criminal prosecutions of the licensee. (*Cornell v. Reilly* (1954) 127 Cal.App.2d 178, 184–185.) In that administrative setting, a licensee's lack of knowledge or specific authorization does not necessarily prevent attribution of an employee's unlawful conduct to the licensee. In *Reimel v. Alcoholic Beverage Control Appeals Board* (1967) 252 Cal.App.2d 520, 522–523, the court upheld discipline arising from a bartender's acceptance of a wager while transacting the licensee's business, although the licensee lacked knowledge of the incident and the bartender acted outside his authority.

Here, the connection between Rexha's conduct and appellants' licensed business is direct. He furnished the very beer appellants' clerk provided to him for delivery under the Uber Eats order. The Department did not hold appellants responsible for an unrelated act merely because Rexha worked as a delivery

driver. It attributed Rexha's conduct to appellants' conduct in carrying out the alcohol delivery they had entrusted to the service. (Conclusions of Law ¶¶ 9–11.)

Appellants' authorities do not require proof that they specifically authorized the unlawful furnishing. *People v. Doble* (1928) 203 Cal. 510, 515–516, addressed the requirements for holding a principal criminally liable for an agent's acts. *Nuffer v. Insurance Co. of North America* (1965) 236 Cal.App.2d 349, 354–356, addressed insurance coverage for a loss caused by an agent's arson. Although *Nuffer* discussed the limits on presumed authority to commit a crime, it did so in determining the insurer's contractual responsibility for the loss. Neither decision establishes the standard governing administrative responsibility for alcohol furnished by a delivery agent in the course of fulfilling a licensee's order.

The evidence of appellants' preventive policies does not alter that conclusion. The Department acknowledged the clerk's identification-checking procedures, the instructions against delivery to minors, Uber Eats' age-verification and return procedures, and Helou's testimony concerning appellants' lack of control over the delivery service. (Findings of Fact ¶¶ 15–17, 21–22.) Helou also expressly denied that anyone at the store instructed Rexha to furnish alcohol to a minor. (RT, vol. II, p. 69, lines 9–19.) These matters support appellants' position that the unlawful handoff was contrary to their wishes. They do not negate the agency relationship or remove the handoff from the alcohol-delivery transaction Rexha was performing on their behalf.

This application of Rule 141.1(c) is consistent with *Giaf Alhosry, Inc.* (2021) AB-9923, pages 9–10, and *Goleta Continental Liquor, Inc.* (2021) AB-9925, pages 7–9, which recognized administrative responsibility for alcohol furnished to minor decoys through third-party delivery drivers. Appellants correctly observe that those decisions do not eliminate the need to establish an underlying violation. Nor do we treat their different evidentiary circumstances as controlling the factual disputes here. As explained in the preceding section, the findings and evidence in this record establish the furnishing independently of the agency determination.

Accordingly, the Department properly treated Rexha as appellants' agent for this delivery and attributed his furnishing of the beer to appellants. A further finding that appellants specifically authorized him to furnish alcohol unlawfully to a minor was not required.

D. The Credibility Determination and the Whole Record Support the Department's Decision

Appellants contend that the ALJ rejected Rexha's testimony concerning his attempted recovery of the beer solely because it was "self-serving," without identifying an adequate factual basis for that determination. They emphasize that the Department did not cross-examine Rexha and that Agent Villanueva's attention was directed toward the decoy rather than continuously toward the driver. They also argue that the decision overlooked evidence favorable to their account. (Appellants' Opening Brief, pp. 8–11, 18–19, 22–23.) The Department responds that Villanueva's rebuttal testimony supplied substantial evidence

supporting the credibility determination and that the absence of findings concerning witness demeanor does not require rejection of that determination. (Department's Reply Brief, pp. 12–13.)

Government Code section 11425.50 requires a written statement of the factual and legal basis for an administrative decision. When a determination rests substantially on witness credibility, subdivision (b) requires identification of any specific evidence of observed demeanor, manner, or attitude supporting that determination. The special weight prescribed by that subdivision extends only to the extent the determination identifies those observational grounds.

In *California Youth Authority v. State Personnel Board* (2002) 104 Cal.App.4th 575, 595–596, the court declined to give special weight to credibility findings that identified no observed demeanor, manner, or attitude. The court did not hold that the findings therefore had to be rejected. It expressly declined to decide whether the absence of such observations rendered the proposed decision defective because no party had raised that question. (*Id.* at p. 596, fn. 11.)

Here, the Department's decision identifies no demeanor-based reason for rejecting Rexha's account. We therefore accord the determination no special weight on that basis. The remaining questions are whether the decision sufficiently identifies its reasoning and whether the record supports the determination under the substantial-evidence standard.

The decision does more than characterize Rexha's account as self-serving. After rejecting his statement that he tried to reclaim the alcohol, the ALJ expressly states: "Agent Villanueva's contrary testimony is accepted as credible." (Conclusion of Law ¶ 8, fn. 5.) The decision also identifies Villanueva's testimony that he neither heard Rexha say anything nor observed him attempt to contact Chavez after the delivery. (Finding of Fact ¶ 25, fn. 2.) Read together, these passages identify the evidentiary conflict the ALJ resolved and the testimony on which the resolution rested.

The description "self-serving," standing alone, would provide little explanation for rejecting testimony. A witness's account does not lack credibility merely because it supports that witness's position. But that description does not stand alone here. The decision's express reliance on contrary testimony supplies a basis that can be examined against the record.

Rexha testified that, after the application identified Chavez as underage, he repeatedly called out to her to wait so that he could retrieve the beer. He described turning toward her, raising his voice, and attempting to attract her attention as she walked toward a vehicle. (RT, vol. II, p. 110, lines 1–24; p. 111, lines 10–23.) Villanueva testified that he was approximately 15 to 20 yards away, inside a vehicle with its windows down, and had a clear view of the transaction. He saw Rexha walk toward his vehicle, heard no statement directed to Chavez after she received the beer, and saw no attempt to shout or signal her. He also testified

that his view of Rexha as Rexha walked toward his vehicle was unobstructed. (*Id.*, p. 123, lines 16–25; p. 124, lines 1–25; p. 125, lines 1–4.)

Appellants correctly identify a limitation in this evidence. Villanueva acknowledged that his attention was directed toward Chavez as she walked back toward the agents' vehicle. (RT, vol. II, p. 125, lines 13–25; p. 126, line 1.) His testimony does not establish that he watched Rexha continuously, and we do not treat it as doing so. Nor does his failure to hear or see an attempted recovery conclusively establish that none occurred.

Nevertheless, Villanueva's proximity, open windows, observations of Rexha's movement, and unobstructed view provided a reasonable basis for evaluating Rexha's description of repeated calls and efforts to attract Chavez's attention. The ALJ could reasonably regard Villanueva's failure to hear or observe those efforts as evidence contrary to Rexha's account. The acknowledged focus on the decoy affects the weight of that evidence; it does not deprive the testimony of probative value. Appellants' proposed inference—that Villanueva simply missed the attempted recovery—is possible, but the availability of that inference does not require the Board to replace the Department's supported resolution with a different one. (*Boreta*, *supra*, 2 Cal.3d at pp. 94–95.)

The Department's decision not to cross-examine Rexha does not make his account uncontradicted. After Rexha completed his testimony, the Department called Villanueva in rebuttal, and appellants cross-examined him concerning his location and attention to the decoy. (RT, vol. II, p. 119, lines 22–23; p. 120, lines 11–

16; pp. 123–126.) The record thus contains a challenge to Rexha's account, although it was presented through another witness.

Appellants also rely on Department counsel's statement at the first hearing that Villanueva would have nothing pertinent to contribute to the Department's case-in-chief. (Appellants' Opening Brief, pp. 18–19.) Counsel made that statement while seeking release of witnesses whom appellants had subpoenaed, explaining that Villanueva was not the reporting agent and would not be called in the Department's initial presentation. (RT, vol. I, p. 15, lines 12–25; p. 16, lines 1–18.) The statement does not establish what Villanueva perceived during the operation or refute the observations to which he later testified. His subsequent testimony addressed Rexha's account of an attempted recovery. The change in the Department's presentation does not, by itself, establish that the rebuttal testimony was unreliable.

The Board's decision in *7-Eleven, Inc./Singh* (2015) AB-9485 does not compel a different conclusion. There, inconsistencies in the clerk's testimony and contrary evidence supported the ALJ's credibility determination. (*Id.* at p. 11.) Those particular inconsistencies are absent here, but the decision does not require the same form of contradiction in every case. It also rejected the contention that the absence of specified demeanor findings necessarily deprives a credibility determination of weight. (*Id.* at pp. 12–13.) Here, the relevant support is Villanueva's testimony concerning his observations of the encounter.

Appellants' remaining evidence does not render the Department's findings unsupported when the record is considered as a whole. Chavez's limited recollection warrants caution in relying on her account of details she could not remember. Her inability to recall those details neither corroborates Rexha's asserted calls nor establishes that he remained silent. The Department expressly relied on Villanueva to resolve that dispute. Chavez's testimony concerning the actual handoff, considered together with Tan's and Rexha's accounts, supports the transfer finding for the reasons already discussed. (RT, vol. I, pp. 38–40; Conclusion of Law ¶ 8, fn. 5.)

The decision also expressly addresses much of the evidence appellants characterize as overlooked. It recounts the store's training and identification procedures, Uber Eats' restrictions and return procedures, Helou's testimony concerning the store's lack of control over drivers, the cancellation of the order, the different account name, and Rexha's return of the beer. (Findings of Fact ¶¶ 15–23, 25.) Those circumstances explain appellants' position and support the conclusion that furnishing alcohol to a minor was contrary to the applicable policies. They do not establish that Rexha followed those policies at every stage or that he made the particular recovery attempt he described. The eventual return of the beer likewise does not resolve whether he called out to Chavez before the agents contacted him.

Rexha additionally testified that he continued working for Uber, had not been barred from alcohol deliveries, had no conviction arising from the incident,

and had no proceedings pending against him. (RT, vol. II, p. 99, lines 14–25; p. 100, lines 1–3; p. 118, lines 9–20.) The decision does not expressly discuss those circumstances. But the testimony does not establish that Uber or a criminal court determined that his account of the attempted recovery was accurate. His continued eligibility to make deliveries and the absence of a conviction do not supply a factual resolution of the conflict between his testimony and Villanueva's. As explained above, this proceeding determines administrative responsibility for the exercise of appellants' license privileges. (*Cornell*, *supra*, 127 Cal.App.2d at pp. 184–185.)

We have considered these arguments on their merits rather than disregarding them categorically for the asserted deficiencies in appellants' citations. (See Department's Reply Brief, p. 7.) The decision identifies the basis for the challenged credibility determination, and substantial evidence supports it when the contrary evidence and limitations in the witnesses' accounts are considered. Because appellants have not established error in that determination, we need not reach the Department's alternative argument that any error was nonprejudicial. (*Id.* at pp. 12–13.)

E. Appellants Have Not Established a Violation of Rule 141.1's Fairness Requirements

Appellants contend that the operation was unfair because an adult agent placed the order, the account and displayed customer names differed, the ordering process circumvented Uber Eats' age-verification procedures, and the

agents prevented Rexha from recovering the beer after the application identified Chavez as underage. They argue that these circumstances required consideration beyond the physical handoff. (Appellants' Opening Brief, pp. 20–21.) The Department responds that Rule 141.1 defines fairness by reference to its enumerated conditions and does not create a separate defense based on a general assessment of the operation's fairness. (Department's Reply Brief, p. 6.)

Rule 141.1(a) expressly defines fairness as "compliance with all the conditions set forth in subdivision (e)." Those conditions concern the decoy's age, apparent age under the circumstances presented to the delivery person, presentation of identification, and truthful answers to age-related questions at delivery. The decoy must be under 20, appear under 21, and either carry identification showing the correct birthdate or carry none; any identification carried must be presented upon request. The requirement of truthful answers does not extend to questions asked when the alcohol is ordered. (Rule 141.1(e)(1)–(4).) Noncompliance provides a defense to an action under section 25658. (Rule 141.1(f).)

The express definition governs appellants' regulatory claim. In considering the analogous fairness provision of Rule 141, the Court of Appeal declined to add an obligation requiring a decoy to correct a clerk's mistaken statement about age when the clerk had asked no question. (*Department of Alcoholic Beverage Control v. Alcoholic Beverage Control Appeals Board* (2017) 7 Cal.App.5th 628,

639–641.) The court's reasoning counsels against enlarging an enumerated regulatory requirement through a general appeal to fairness.

The Board has applied that approach to delivery operations. In *California Fine Wine & Spirits, LLC* (2025) AB-10021, pages 7–8, the Board explained that Rule 141.1 does not require the decoy personally to place the order or prohibit Department-controlled or fictitious ordering profiles. The rule's safeguards address the decoy's age and conduct when the alcohol is delivered. That interpretation is consistent with the regulation's express distinction between questions asked at delivery and those asked when the order is placed.

Here, the Department found that Chavez was 19 years old and displayed the appearance generally expected of a person under 21 under the actual circumstances presented to Rexha. It also found that she provided her own California driver license when he requested identification. The license showed her correct birth date and bore a red stripe stating that she would turn 21 in 2025. (Findings of Fact ¶¶ 4–8, 13.) Chavez's testimony confirmed her age and that she supplied her identification for scanning. (RT, vol. I, p. 21, lines 7–16; p. 24, lines 10–20; p. 25, lines 19–24.) Appellants identify no false answer she gave to an age-related question at delivery. Chavez could not remember whether Rexha asked her age, but that lack of recollection does not establish that she answered such a question falsely. (*Id.*, p. 25, lines 16–18.)

The ordering evidence does not establish a violation of these safeguards. The Department acknowledged that Gonzalez placed the order, that the store's

display identified Berenice C., and that the underlying account listed Alex S. (Findings of Fact ¶¶ 6, 11, 23.) Appellants infer from those circumstances and Helou's description of Uber Eats' procedures that the agents circumvented restrictions that would have prevented Chavez from ordering alcohol herself. Even accepting that the ordering process permitted an adult to initiate a transaction, the minor could not have initiated through her own account, that circumstance does not establish a Rule 141.1 violation. The regulation does not make the minor's ability to place the order a condition of a permissible delivery-decoy operation. (*California Fine Wine & Spirits, LLC*, *supra*, AB-10021, at p. 8.)

Nor did the ordering information deprive Rexha of access to Chavez's actual age. She supplied her identification, and Rexha testified that the application ultimately identified her as underage. His account places the handoff before that notification, while the application was still processing. (RT, vol. II, p. 109, lines 19–25; p. 110, lines 1–4.) The resulting violation did not depend on the application falsely approving Chavez as an adult. Appellants' objection instead concerns the timing of Rexha's transfer of the beer in relation to the verification process. As explained above, the application's subsequent rejection did not undo the furnishing.

The asserted interference with recovery likewise does not establish the claimed regulatory defense. The Department rejected Rexha's testimony that he attempted to reclaim the beer, and we have explained why that determination is supported by the record. (Conclusion of Law ¶ 8, fn. 5.) The beer's eventual

return to Rexha and then to the store was expressly acknowledged in the findings. (Findings of Fact ¶¶ 9, 18.) Those later events do not demonstrate noncompliance with the safeguards governing Chavez's participation in the delivery.

Our conclusion addresses the particular Rule 141.1 defense presented here. Appellants' objections to the ordering process, verification sequence, and subsequent recovery do not establish a violation of the regulation's stated fairness requirements. They therefore provide no basis for reversal under Rule 141.1.

V. CONCLUSION

Substantial evidence in light of the whole record supports the Department's material findings, and those findings support its determination that appellants, through their delivery agent, furnished alcohol to a minor in violation of Business and Professions Code section 25658, subdivision (a). Appellants have not established error in the challenged credibility determination or noncompliance with Rule 141.1.

The decision of the Department suspending appellants' license for 15 days is affirmed.

ORDER

Pursuant to Business and Professions Code section 23085, the Department's decision is affirmed.[3]

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

[3] 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.

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.

APPENDIX

PETITION FOR PAYMENT OF FINE IN LIEU OF SUSPENSION AND FINANCIAL STATEMENT

Licensee:	RAJAA W. ABDULLATIF & RIMON IBRAHIM MAKHLOUF	File:	File: 21-363358
DBA:	JJ LIQUOR	Reg.:	24094730
Address:	311 CASTILLO ST SANTA BARBARA, CA93101		
District:	VENTURA		

RECEIVED
APR 23 2026
Alcoholic Beverage Control
Office of Legal Services

IMPORTANT INFORMATION-READ CAREFULLY

YOU MAY BE ELIGIBLE TO PAY A FINE IN LIEU OF THE SUSPENSION IMPOSED

Business and Professions Code section 23095 establishes that in certain circumstances a licensee may file a petition requesting to pay a fine in lieu of serving a suspension. Fines range from $750 to $6,000 for a first offense, $1,500 to $12,000 for a second offense within 36 months, and $2,500 to $40,000 for a second sale to a minor within 36 months.

The Department will only authorize payment of a fine in lieu of suspension if:

- Allowing a fine would not be contrary to public welfare and morals
- A fine would serve the desired disciplinary purpose of the Department, and
- The records and books of the licensee are kept in such a manner that the fine amount can be properly calculated.

To request payment of a fine in lieu of suspension YOU MUST SUBMIT A PETITION stating the grounds for why you believe a fine is appropriate in your case. Space is provided below for your petition or you may attach a separate document. YOU MUST ALSO complete and submit the financial statement on page 3 below. Submit both documents together.

Your petition must be received by the Department no more than **TWENTY (20) DAYS** after the mailing of this notice. Mail your petition to the VENTURA District Office at 1000 SOUTH HILL ROAD, SUITE 310, VENTURA, CA 93003 or contact them at (805) 289-0100 if you have any questions.

The Department will commence an investigation into your request that may include a request for sales records. If your petition is accepted you will be notified of the fine amount and payment instructions. If your petition is denied you will be notified of the start date for your suspension.

PETITION FOR PAYMENT OF FINE IN LIEU OF SUSPENSION AND FINANCIAL STATEMENT

Describe why 1) allowing your business to pay a fine instead of serving a suspension would not be contrary to public welfare and morals and 2) how paying a fine will achieve the desired the disciplinary purpose of a suspension. You may use a separate sheet or may attach additional pages if necessary.

Signed: _____ *Position:* _____

Printed Name: _____ *Date:* _____

PETITION FOR PAYMENT OF FINE IN LIEU OF SUSPENSION AND FINANCIAL STATEMENT

Estimate of alcoholic beverage sales, including all State and local sales taxes:

1. Gross sales of all alcoholic beverages for the preceding 12 full months: (1) $_____

   (If sales of alcoholic beverages are not separated from total sales or you have not operated for a full 12-month period, you may offer a reasonable formula for figuring the amount.)

   Period covered in computing offer _____ *(Example: 4/1/04 thru 3/31/05)*

   If offer is based upon markup of purchases, show percentage markup or cost: _____

2. Estimated daily average gross sales: (2) $_____
   (Figure in (1) divided by 365 days or the actual number of sales days used in figuring (1))

   If open less than 365 days, show number of days used in your computation: _____

3. 50% of estimated daily average gross sales: (3) $_____
   (Figure in (2) multiplied by 50%.)

4. Basic offer in compromise: (4) $_____
   (Figure in 3 multiplied by the number of days (**15**) upon which I am proposing to pay the offer in compromise.)

5. You must use either Method (a), (b) or (c), below, for computing the amount for Item 6 below. Department records show you should use Method __a__.

Method (a)	**Method (b)**	**Method (c)**
Use this method if you ***have not*** had another accusation filed against your license within three years prior to the date you first requested permission to petition the Department. If amount in Item (4) is more than $6,000, enter $6,000 in Item (6) below. If amount in Item (4) is less than $750, enter $750 in Item (6) below. If amount in Item (4) is less than $6,000, and more than $750, enter that amount in Item (6) below.	Use this method if you ***have*** had an accusation filed against your license within three years prior to the date you first requested permission to petition the Department. If amount in Item (4) is more than $12,000, enter $12,000 in Item (6) below. If amount in Item (4) is less than $1,500, enter $1,500 in Item (6) below. If amount in Item (4) is less than $12,000, and more than $1,500, enter that amount in Item (6) below.	Use this method if this petition involves a violation of Section 25658 and you have had a previous violation of Section 25658 within 36 months. If amount in Item (4) is more than $40,000, enter $40,000 in Item (6) below. If amount in Item (4) is less than $2,500, enter $2,500 in Item (6) below. If amount in Item (4) is less than $40,000 and more than $2,500, enter that amount in Item (6) below.

6. Sum offered in payment: (6) $_____

If this form is prepared or reviewed by a public accountant, the account must sign the statement below:

THIS FORM PREPARED IN ACCORDANCE WITH RULES PRESCRIBED BY THE CALIFORNIA STATE BOARD OF ACCOUNTANCY.

_____ *License Number*_____

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

IN THE MATTER OF THE ACCUSATION AGAINST:

RAJAA W. ABDULLATIF & RIMON IBRAHIM MAKHLOUF
JJ LIQUOR
311 CASTILLO ST
SANTA BARBARA, CA93101

OFF-SALE GENERAL - LICENSE

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

VENTURA DISTRICT OFFICE

File: 21-363358

Reg: 24094730

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 April 20, 2026. 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 June 1, 2026, a representative of the Department will contact you to arrange to pick up the license certificate.

https://abcab.ca.gov/abcab_resources/

Sacramento, California

Dated: April 21, 2026

Paul Tupy
Director

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

IN THE MATTER OF THE ACCUSATION AGAINST:

Rajaa W. Abdullatif & Rimoun Ibrahim Makhlouf dba JJ Liquor 311 Castillo St. Santa Barbara, California 93101 Respondents	File: 21-363358 Reg.: 24094730 License Type: 21 Word Count: 11,000 & 21,000 Reporter: Dalauna Cardoza & Jennifer Vallejo Kennedy Court Reporters
Off-Sale General License	**PROPOSED DECISION**

Administrative Law Judge Matthew G. Ainley, Administrative Hearing Office, Department of Alcoholic Beverage Control, heard this matter at by videoconference on June 11, 2025 and November 12, 2025.

Bryan D. Rouse and Andrea S. Maehara, Attorneys, and Joseph J. Scolari, Assistant General Counsel, represented the Department of Alcoholic Beverage Control.

Matthew J. Norris, attorney-at-law, represented respondents Rajaa W. Abdullatif and Rimoun Ibrahim Makhlouf.

The Department seeks to discipline the Respondents' license on the grounds that, on or about June 20, 2024, the Respondents, through their agent or employee, sold, furnished, or gave alcoholic beverages to Berenice Gomez Chavez, an individual under the age of 21, in violation of Business and Professions Code section 25658(a).[1] (Exhibits 1 & 1A.)

Oral evidence, documentary evidence, and evidence by oral stipulation on the record was received at the hearing. The matter was argued and submitted for decision on November 12, 2025.

FINDINGS OF FACT

1. The Department filed the accusation on September 20, 2024.

[1] All statutory references are to the Business and Professions Code unless otherwise noted.

2. The Department issued a type 21, off-sale general license to the Respondents for the above-described location on April 18, 2000 (the Licensed Premises).

3. The Respondents' license has been the subject of the following discipline:

Date Filed	Reg. No.	Violation	Penalty
12/09/2002	02054157	BP §25658(a)	15-day susp.
06/12/2013	13078685	BP §25658(a)	15-day susp.
12/05/2018	18088304	BP §25658(a)	15-day susp.

The foregoing disciplinary matters are final. (Exhibits D2-D4.)

4. Berenice Gomez Chavez was born on September 3, 2004. On June 20, 2024, she served as a minor decoy during an operation conducted by the Department. On that date she was 19 years old.

5. Chavez's appearance was the same on June 20, 2024 and at the hearing. She was 5'4" tall and weighed 150 pounds. Her hair was long and parted in the middle. A photo of Chavez taken before the operation commenced accurately reflects her appearance on June 20, 2024. (Exhibit D5.)

6. On June 20, 2024, Agent M. Gonzalez ordered a can of Modelo Especial beer from the Licensed Premises via Uber Eats, a delivery app. (Exhibit D8.) Chavez waited in a hotel parking lot for the driver to arrive, while various agents waited in their vehicles.

7. Andi Rexha pulled up in his vehicle. He exited and approached Chavez. Rexha asked to see her ID. Chavez handed him her California driver license. He scanned it by holding his phone over the front and back of the ID. He then handed it back to her.

8. Chavez's driver license was in the vertical format used for minors. It had her date of birth, photo, and physical descriptors. It also bore a red stripe with the phrase "Age 21 in 2025." (Exhibit D6.)

9. Rexha handed the beer to her and she walked over to the agents' vehicle. Agent S. Tan approached Rexha and identified himself as a law enforcement officer. He explained the violation to him. Chavez identified Rexha as the person who sold her the beer. Photos were taken of Rexha and the beer. (Exhibits D7 & D9.) Agent Tan returned the beer to Rexha.

10. The agents went to the Licensed Premises and contacted the clerk, Madelyn Mendez Diaz. Agent Tan explained the violation to her and asked if the Licensed Premises had

engaged in a transaction via Uber Eats. She confirmed that it did, but was unaware that the driver had provided alcohol to a minor.

11. Mendez showed Agent Tan how the ordering system was hooked up to her register. Agent Tan took a photo of the register's screen showing the order in question, a Modelo beer for Berenice C. (Exhibit D10.) While the agents were at the Licensed Premises, Rexha showed up.

12. Chavez learned of the decoy program through the Explorer program. She is currently in college and has not been a decoy since June 20, 2024.

13. Chavez's appearance was consistent with her actual age, 19 years old. Based on her overall appearance, i.e., her physical appearance, dress, poise, demeanor, maturity, and mannerisms shown at the hearing, and her appearance and conduct in front of Rexha on June 20, 2024, Chavez displayed the appearance which could generally be expected of a person under 21 years of age under the actual circumstances presented to Rexha.

14. Rimoun Makhlouf, co-owner and co-licensee, testified that he has owned the Licensed Premises for 25 years. The Licensed Premises is a liquor store located near the beach, a hotel, and a community college. Law enforcement officers regularly send in decoys and they successfully do not sell to them. (Exhibit R4.) None of the three prior incidents involved delivery apps.

15. Mendez described the training she received when she was first hired. It included how to inspect IDs and how to spot fake IDs. She was instructed to refuse to sell to anyone who looked too young, even if they had an ID.

16. The Licensed Premises has contracts with Uber Eats, Grubhub, and DoorDash. When orders come in via a delivery app, Mendez fills the order and places it aside for the driver. When the driver appears, she asks to see ID and verifies the age of the driver, even if it is someone she has seen before. Drivers are instructed to check ID upon delivery and to refuse to give alcohol to minors or people who are intoxicated.

17. The order at issue here was for a tall boy. She got the beer and bagged it. Rexha arrived to pick it up. She verified that he was over 21 by checking his ID before giving it to him. Mendez testified that it is the driver's responsibility to check ID upon delivery.

18. Rexha came back to the Licensed Premises while the agents were there. He returned the beer, which she put back in stock.

19. John Helou is the general manager of the Licensed Premises. He was first hired in 2021 as a cashier and became a manager in 2022. He underwent rigorous training when

first hired, 60% of which involved preventing sales to minors, including how to check IDs. Later, he went through the Department's LEAD training. He trained Mendez when she was first hired.

20. Minors have attempted to purchase alcohol hundreds of times. He has seized hundreds of fake IDs while working at the Licensed Premises. (Exhibit R13.)

21. The Licensed Premises uses various delivery apps. Presently, approximately 20% of their business is from delivery services. With respect to Uber Eats, Helou identified various terms and conditions of the agreement with them. Notably, sections 6.f and 6.g of the Terms and Conditions deal with alcohol delivery and returns. (Exhibit R1.) The Alcohol Delivery with Uber Eats instructions to drivers provide that drivers can cancel an order if they prefer not to deliver it and includes provisions relating to sobriety and verification of age. Drivers are informed that delivery of alcohol to minors is illegal and that orders can be cancelled using the customer-doesn't-have-valid-ID button. (Exhibit R2.) Merchants are informed that they must indicate if an order has alcohol beverages or other age-restricted items in it. (Exhibit R3.)

22. Helou testified that the Licensed Premises did not have any input into these policies. All customer contact is with Uber Eats; the Licensed Premises simply fills the orders when they come in. He also testified that they cannot control the actions of customers or delivery services once they leave the Licensed Premises. If a driver delivered alcohol to a minor, it was against the Licensed Premises' policy.

23. Helou tracked the order in question. The display screen viewed by the Department showed that Berenice C.'s order was cancelled. (Exhibit D10.) The underlying Uber Eats account lists the customer as Alex S. (Exhibits R7-R9.) From his personal account, Helou is aware that customers must agree to Uber Eats' Terms of Use and Privacy Notice and, if ordering alcohol, must verify their age. (Exhibits R12 & R14.)

24. Rexha testified that he has been working for Uber for approximately 6½ years as a rideshare driver, of which the last six included delivery. He tries not to accept delivery orders that include alcoholic beverages because they are a hassle. When he first started making alcohol deliveries, he had to go through a series of screens in the driver version of the app and watch a video. Some of this material included information about delivery to minors.

25. Rexha "somewhat" recalled the delivery at issue here. He asked to see Chavez's ID, which she handed to him. He glanced at it, then scanned it. He was walking toward his car when he noticed that the app indicated that she was underage. Since she was already

walking away, he tried to call her back.[2] At this point, the agents approached him. He took the alcohol back to the Licensed Premises and returned it. He testified that he never worked for the Licensed Premises.

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

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 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.

3. Section 25658(a) provides that every person who sells, furnishes, gives, or causes to be sold, furnished, or given away, any alcoholic beverage to any person under the age of 21 years is guilty of a misdemeanor.

4. Rule 141.1[3] sets forth the requirements for an operation in which alcoholic beverages are delivered to a minor decoy. Subsection (c) of this rule provides that, "[f]or purposes of this section, 'agent' shall mean any entity or person the licensee uses or contracts or agrees with, who is not an employee of the licensee, including but not limited to a third-party delivery person or service, to deliver alcoholic beverages to persons who place orders by way of the Internet, telephone, or other electronic means."

5. 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) on the basis that, on June 20, 2024, the Respondents' agent, Andi Rexha, sold, furnished, or gave an alcoholic beverage to Berenice Chavez, a person under the age of 21, in violation of Business and Professions Code section 25658(a) (Findings of Fact ¶¶ 4-25.)

6. The Respondents argued that there was no completed delivery of alcohol in this case. First, nothing was delivered to Agent M. Gonzalez, who placed the order. Second, the app on Rexha's phone indicated that Chavez was underage and, under Uber Eats policies, Rexha was not supposed to hand over the alcohol to her. On a related note, the

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[2] Agent A. Villanueva testified that he did not hear Rexha say anything or otherwise try to contact Chavez after the delivery.

[3] All rules referred to herein are contained in title 4 of the California Code of Regulations unless otherwise noted.

Respondents noted that, if Chavez had placed the order using her actual birthdate, the app would not have taken the order. Third, when Rexha realized that the app had rejected the ID, he attempted to get the alcohol back, but was prevented from doing so by the agents who, by that time, had contacted him.

7. These arguments are rejected. Chavez was listed on the order as the recipient to whom it was supposed to be delivered. The mere fact that someone else placed the order in the first place does not change the fact that Rexha delivered the alcohol to a minor.[4]

8. In this case, the Respondents and Rexha actually knew that Chavez was the customer and the intended recipient. Her name, Berenice C., was listed as the customer on the Licensed Premises' display screen. The clerk, Madelyn Mendez Diaz, filled the order knowing it would be picked up for delivery to Berenice C. Rexha located Chavez, confirmed her identity via her ID, and delivered the alcohol to her, after which she walked away. Mendez and Rexha were both fully aware that Chavez was the intended recipient.[5]

9. The Respondents also argued that, based on their agreement with UberEats, Rexha was not its agent or employee. In the Respondents' view, they had no control over Rexha's actions once he picked up the alcohol and, further, had no control over the alcoholic beverage or the delivery process once the alcohol had been picked up. Additionally, Rexha's delivery of the alcohol to Chavez violated Uber Eats' policies.

10. This argument is rejected. The Respondents have been licensed by the Department, Uber Eats has not. The evidence is clear that the Respondents have retained various delivery services, including Uber Eats, to deliver their product to customers—which is exactly what happened in this case. As indicated above, Rexha picked up the alcohol purchased from the Respondents and delivered it to the intended recipient, Chavez. It is irrelevant that the delivery was made in violation of Uber Eats policies. Virtually every licensee has procedures and policies to prevent the sale of alcohol to minors. Nonetheless, if such a sale occurs, the licensee is responsible for it.

11. Case law is clear that licensees have an affirmative obligation to ensure that the licensed premises are not used in violation of the law.[6] The Respondents' legal

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[4] A common situation where an adult is involved in the transaction is to a common in-store sale often referred to as a furnishing case. The law is clear that, if the facts establish that the clerk had reason to believe that a minor is involved in the transaction—even if an adult is nominally paying for it—the clerk and the licensee are still responsible for furnishing alcohol to a minor.

[5] In making this finding, Rexha's self-serving statement that he tried to reclaim the alcohol is rejected on the basis that it is not credible. Agent Villanueva's contrary testimony is accepted as credible.

[6] *Morell v. Department of Alcoholic Beverage Control*, 204 Cal. App. 2d 504, 514, 22 Cal. Rptr. 405, 411 (1962); *Marcucci v. Board of Equalization*, 138 Cal. App. 2d 605, 610, 292 P.2d 264, 266 (1956); *Reilly*

obligations as a licensee—in this case, to prevent the sale of alcohol to a minor—are nondelegable. The Respondents have chosen to make deliveries to patrons who purchase alcoholic beverages from them by retaining delivery services. As rule 141.1 makes clear, the delivery service is an agent of the Respondents when delivering alcohol sold pursuant to their license.

PENALTY

The Department requested that the Respondents' license be suspended for 15 days as set forth in rule 144. The Respondents did not recommend a penalty in the event that the accusation were sustained. The violation at issue here is fairly typical—other than the priors, which are remote, there are no aggravating or mitigating circumstances. The penalty recommended herein complies with rule 144.

ORDER

The Respondents' off-sale general license is hereby suspended for 15 days.

Dated: March 10, 2026

Matthew G. Ainley
Administrative Law Judge

☑ Adopt

☐ Non-Adopt: _____

_____

By: _____

Date: 04/20/26

v. Stroh, 161 Cal. App. 3d 47, 51, 207 Cal. Rptr. 250, 252 (1984); and *Laube v. Stroh*, 2 Cal. App. 4th 364, 379, 3 Cal. Rptr. 2d 779, 789 (1992).

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

IN THE MATTER OF THE ACCUSATION AGAINST: RAJAA W. ABDULLATIF & RIMON IBRAHIM MAKHLOUF JJ LIQUOR 311 CASTILLO ST SANTA BARBARA, CA93101 OFF-SALE GENERAL - LICENSE under the Alcoholic Beverage Control Act.	File: 21-363358 Reg: 24094730 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 April 21, 2026, 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:

RAJAA W. ABDULLATIF & RIMON IBRAHIM MAKHLOUF
JJ LIQUOR
311 CASTILLO ST
SANTA BARBARA, CA93101

9589 0710 5270 2638 2160 65

MATTHEW J. NORRIS, ATTORNEY AT LAW
10940 WILSHIRE BLVD, STE 1600
LOS ANGELES, CA 90024

9589 0710 5270 2638 2160 72

Office of Legal Services
Headquarters, Inter Office Mail

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 April 21, 2026 at Sacramento, California.

Mark Kinyon
Mark Kinyon

_X_ VENTURA DISTRICT OFFICE (INTEROFFICE MAIL)
___ DIVISION OFFICE (INTEROFFICE MAIL)

March 12, 2026

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,

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: RAJAA W. ABDULLATIF & RIMON IBRAHIM MAKHLOUF JJ LIQUOR 311 CASTILLO ST SANTA BARBARA, CA93101 OFF-SALE GENERAL - LICENSE under the Alcoholic Beverage Control Act.	File: 21-363358 Reg: 24094730 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 March 12, 2026, 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:

RAJAA W. ABDULLATIF & RIMON IBRAHIM MAKHLOUF
JJ LIQUOR
311 CASTILLO ST
SANTA BARBARA, CA93101

BRYAN ROUSE
3927 LENNANE DRIVE, SUITE 100
SACRAMENTO, CA 95834

ANDREA S. MAEHARA
12750 CENTER COURT DRIVE, SUITE 700
CERRITOS, CA 90703

MATTHEW J. NORRIS, ATTORNEY AT LAW
10940 WILSHIRE BLVD, STE 1600
LOS ANGELES, CA 90024

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 March 12, 2026 at Sacramento, California.

Mark Kinyon

Mark Kinyon

_X_ VENTURA DISTRICT OFFICE (INTEROFFICE MAIL)
___ DIVISION OFFICE (INTEROFFICE MAIL)

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

IN THE MATTER OF THE ACCUSATION AGAINST: Rajaa W. Abdullatif & Rimoun Ibrahim Makhlouf Dba: JJ Liquor 311 Castillo Street Santa Barbara, CA 93101 Off-Sale General - License Under the Alcoholic Beverage Control Act.	FILE: 21-363358 REG: 24094730 **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 October 1, 2025, I mailed from Sacramento:

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

Rajaa W. Abdullatif &
Rimoun Ibrahim Makhlouf
Dba: JJ Liquor
311 Castillo Street
Santa Barbara, CA 93101

Matthew J. Norris, Attorney at Law
Norris Law Group, P.C.
10940 Wilshire Blvd., Ste. 1600
Los Angeles, CA 90024

{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

x OLS (Inter-Departmental Mail)
x Ventura 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

March 10, 2026

In the Matter of the Accusation Against:

Rajaa W. Abdullatif & Rimoun Ibrahim Makhlouf
dba JJ Liquor
311 Castillo St.
Santa Barbara, California 93101

RECEIVED
MAR 12 2026
Alcoholic Beverage Control
Administrative Records Office

File: 21-363358
Reg: 24094730

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,

Alberto Roldan
Administrative Law Judge

DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL
Office of Legal Services

Paul Tupy, Director

Gavin Newsom, Governor

3927 Lennane Drive, Suite 100
Sacramento, CA 95834

12750 Center Court Drive, Suite 700
Cerritos, CA 90703

Matthew Gaughan, Chief Counsel
Joseph J. Scoleri III, Assistant Chief Counsel

Telephone: (916) 419-2551
Facsimile: (916) 419-2504

March 18, 2026

RECEIVED
MAR 24 2026
Alcoholic Beverage Control
Administrative Records Office

Paul Tupy, Director
Department of Alcoholic Beverage Control
c/o Mark Kinyon, Administrative Records Secretary
3927 Lennane Drive, Suite 100
Sacramento, CA 95834

Re: Comments to Proposed Decision in the Accusation against Rajaa Abdullatif and Rimon Makhlouf dba JJ Liquor, License No. 21-363358, Registration No. 24094730

Dear Director Tupy,

The Department requests that you correct two non-substantive errors in the Proposed Decision and then adopt the Proposed Decision with said corrections at your earliest convenience.

Both errors appear on the first page of the Proposed Decision. Department counsel's last name is misspelled and an incorrect job title is listed. The correct spelling of counsel's name is "Scoleri" and the correct job title is Assistant Chief Counsel.

The Department requests that you correct these errors and thereafter adopt the Proposed Decision pursuant to Government Code section 11517(c)(2)(C).

Respectfully submitted,

Joseph J. Scoleri III
Assistant Chief Counsel

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

IN THE MATTER OF THE ACCUSATION AGAINST: RAJAA W ABDULLATIF, RIMOUN IBRAHIM MAKHLOUF JJ LIQUOR 311 CASTILLO ST SANTA BARBARA, CA 93101 Off-Sale General - LICENSE under the Alcoholic Beverage Control Act.	File: 21-363358 Reg: 24094730 DECLARATION OF SERVICE BY MAIL

The undersigned declares that 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 March 18, 2026, I served, by CERTIFIED mail (unless otherwise indicated) a true copy of the following documents:

COMMENTS ON PROPOSED DECISION

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

MATTHEW J. NORRIS
10940 WILSHIRE BLVD, SUITE 1600
LOS ANGELES, CA 90024

JEANNIE ROMAS, GENERAL COUNSEL,
C/O MARK KINYON, ADMINISTRATIVE
RECORDS OFFICER- VIA INTEROFFICE MAIL

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 March 18, 2026 at Sacramento, California.

Michael Clyde

Michael Clyde

X VENTURA DISTRICT OFFICE (INTEROFFICE MAIL)