

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

AB-9975

File: 20-623297; Reg: 22092336

7-ELEVEN, INC. and JJ CORP.,
dba 7-Eleven #17032F
775 North East Street
Anaheim, CA 92805-2150,
Appellants/Licensees

v.

DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL,
Respondent

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

Appeals Board Hearing: November 3, 2023
Sacramento, CA / Videoconference

ISSUED NOVEMBER 7, 2023

Appearances: *Appellants:* Adam N. Koslin, of Solomon, Saltsman & Jamieson, as
counsel for 7-Eleven, Inc. and JJ Corp.,

Respondent: Erica M. Navarro, as counsel for the Department of
Alcoholic Beverage Control.

OPINION

7-Eleven, Inc and JJ Corp., doing business as 7-Eleven #17032F (appellants), appeal from a decision of the Department of Alcoholic Beverage Control (Department)¹ suspending their license for 10 days because their clerk sold an alcoholic beverage to a police minor decoy, in violation of Business and Professions Code section 25658, subdivision (a).²

¹ The decision of the Department, dated June 27, 2023, is set forth in the appendix.

² All statutory references are to the California Business and Professions Code unless otherwise noted.

FACTS AND PROCEDURAL HISTORY

Appellants' off-sale beer and wine license was issued on February 2, 2021.

There is no record of prior departmental discipline against the license.

On June 28, 2022, the Department filed a single-count accusation against appellants charging that, on December 20, 2021, appellants' clerk, Pardeep Sidhu (the clerk), sold an alcoholic beverage to 18-year-old Christopher Gonzalez (the decoy). Although not noted in the accusation, the decoy was working for the Anaheim Police Department (APD) at the time.

At the administrative hearing held on February 27, 2023, documentary evidence was received and testimony concerning the sale was presented by the decoy, by APD Vice Investigator David Montalvan, and APD Officer Alan Valdiserri. Jagjit Singh, franchisee and president of JJ Corp., testified on appellants' behalf.

Testimony established that on December 20, 2021, the decoy entered the licensed premises followed shortly thereafter by Officer Montalvan. The decoy selected a three-pack of Coors Light beer which he took to the sales counter. The clerk rang up the beer without asking for identification and without asking any age-related questions. The decoy exited the premises when the sale was completed.

Officer Valdiserri entered the premises and explained the violation to the clerk. The decoy also re-entered and was asked by Officer Valdiserri who sold him the beer. The decoy pointed at the clerk. A photograph of the decoy and clerk was taken (exh. 5) and the clerk was issued a citation. His employment at the premises was subsequently terminated.

On May 4, 2023, the administrative law judge (ALJ) issued a proposed decision sustaining the accusation and recommending a 10-day suspension of the license. The

Department adopted the proposed decision in its entirety on June 26, 2023, and a certificate of decision was issued the following day.

Appellants then filed a timely appeal contending the Department failed to show that cause for discipline exists under Business & Professions Code §24200(b) because: (1) the Department failed to show that continuation of appellants' license would harm the public's welfare or morals, and (2) *respondeat superior* liability is inappropriate where appellants took all good faith and reasonable measures to prevent violations and swiftly terminated the violating employee. Appellants maintain that the Department is not permitted to impose discipline on a licensee when evidence is lacking to show that the same or similar violations are likely to be repeated or otherwise harm the public. (Appellants' Opening Brief (AOB) at p. 1.)

DISCUSSION

I

PUBLIC WELFARE AND MORALS

Appellants maintain the Department failed to show good cause that continuation of appellant's license would harm the public's welfare or morals — in other words, that the charge in the accusation is not supported by substantial evidence absent such showing.

This Board is bound by the factual findings in the Department's decision so long as those findings are supported by substantial evidence. The standard of review is as follows:

We cannot interpose our independent judgment on the evidence, and we must accept as conclusive the Department's findings of fact. [Citations.] We must indulge in all legitimate inferences in support of the Department's determination. Neither the Board nor [an appellate] court may reweigh the evidence or exercise independent judgment to overturn

the Department's factual findings to reach a contrary, although perhaps equally reasonable, result. [Citations.] The function of an appellate board or Court of Appeal is not to supplant the trial court as the forum for consideration of the facts and assessing the credibility of witnesses or to substitute its discretion for that of the trial court. An appellate body reviews for error guided by applicable standards of review.

(Dept. of Alcoholic Bev. Control v. Alcoholic Bev. Control Appeals Bd. (Masani) (2004) 118 Cal.App.4th 1429, 1437 [13 Cal.Rptr.3d 826].)

When findings are attacked as being unsupported by the evidence, the power of this Board begins and ends with an inquiry as to whether there is substantial evidence, contradicted or uncontradicted, which will support the findings. When two or more competing inferences of equal persuasion can be reasonably deduced from the facts, the Board is without power to substitute its deductions for those of the Department—all conflicts in the evidence must be resolved in favor of the Department's decision. (*Kirby v. Alcoholic Bev. Control Appeals Bd. (1972) 25 Cal.App.3d 331, 335 [101 Cal.Rptr. 815]; Harris v. Alcoholic Beverage Control Appeals Board (1963) 212 Cal.App.2d 106 [28 Cal.Rptr.74].*)

Therefore, when the Board examines a decision of the Department, to determine whether it is supported by substantial evidence, it leads us to consider, in light of the whole record, whether substantial evidence exists, even if contradicted, to reasonably support the Department's findings of fact, and whether the decision is supported by the findings. The Appeals Board cannot disregard or overturn a finding of fact by the Department merely because a contrary finding would be equally or more reasonable. (Cal. Const. Art. XX, § 22; Bus. & Prof. Code § 23084; *Boreta Enterprises, Inc. v. Dept. of Alcoholic Bev. Control (1970) 2 Cal.3d 85, 94 [84 Cal.Rptr. 113]; Harris, supra, at 114.*)

Article XX, section 22 of the California Constitution authorizes the Department to take disciplinary action to protect the public:

The department shall have the power, in its discretion, to deny, suspend, or revoke any specific alcoholic beverage license if it shall determine for good cause that the granting or continuance of such license would be contrary to public welfare or morals.

This general authority, however, does not mean that every violation must be specifically proven to be contrary to public welfare or morals. The criteria for establishing good cause for discipline has been explained as follows:

In order to establish good cause for suspension or revocation of an alcoholic beverage license due to violations of law that do not involve moral turpitude, there must be a rational relationship between the offense and the operation of the licensed business in a manner consistent with public welfare and morals or there must be evidence that the offense had an actual effect on the conduct of the licensed business.

(H.D. Wallace & Associates, Inc. v. Dept. of Alcoholic Bev. Control (1969) 271

Cal.App.2d 589, 593-594 [76 Cal.Rptr. 749].)

In contrast to the position appellants would have us take, previous courts have found that specific findings need not be made on whether conduct charged in an accusation is deleterious to public welfare and morals. In *Schieffelin*, the court found:

To the extent that Schieffelin argues that the Department failed to make a specific finding that its conduct was injurious to public welfare or morals, we note that **both the California Supreme Court and this court have held that a finding that a licensee has violated provisions of the Alcoholic Beverage Control Act is tantamount to a finding of injury to public welfare and morals.** (*Martin v. Alcoholic Bev. etc. Appeals Bd.* (1959) 52 Cal.2d 287, 291 [341 P.2d 296]; *Mercurio v. Dept. Alcoholic etc. Control* (1956) 144 Cal. App. 2d 626, 631 [301 P.2d 474] (*Mercurio*).)

In *Mercurio*, this court held that a finding that licensees had violated a Department rule was in effect a finding that the licensees' acts were contrary to public welfare and morals because the rule itself was an articulation of acts which the Department found to be contrary to public welfare and morals. (*Ibid.*)

Similarly, the Legislature has already determined that the Alcoholic Beverage Control Act is intended “for the protection of the safety, welfare, health, peace, and morals of the people of the State” and that the act involves “in the highest degree” the “moral well-being” of the state and its people. (See Business and Professions Code Section 23001.)^[fn.]

(*Dept. of Alcoholic Bev. Control v. Alcoholic Bev. Control Appeals Bd.* (2005), 128 Cal.App.4th 1195, 1217 [27 Cal.Rptr.3d 766] (*Schieffelin*), emphasis added.)

We have reviewed the entire record and it supports the ALJ’s findings and conclusions. Nothing more is required to establish that substantial evidence supports this decision.

II

LICENSEE’S RESPONSIBILITY

Appellants assert in their opening brief: “it is clear that this case is not suitable for the application of *respondeat superior* to the actions of Clerk Sidhu.” (AOB at p. 8.) We disagree with this assertion and with appellants’ interpretation of the cases on this subject. Both this Board and the courts have consistently found that a licensee may be held liable for the actions of his agents or employees.

The owner of a liquor license has the responsibility to see to it that the license is not used in violation of law and as a matter of general law the knowledge and acts of the employee or agent are imputable to the licensee. [Citation.]

(*Harris v. Alcoholic Beverage Control Appeals Board* (1961) 197 Cal.App.2d 172, 180 [17 Cal.Rptr. 315].)

The *Laube* court noted:

A licensee has a general, affirmative duty to maintain a lawful establishment. Presumably this duty imposes upon the licensee the obligation to be diligent in anticipation of reasonably possible unlawful activity, and to instruct employees accordingly.

(*Laube v. Stroh* (1992) 2 Cal.App.4th 364, 367 [3 Cal.Rptr.2d 779].)

Similarly, in *Reimel* the court stated:

[A] licensee can draw no protection from his lack of knowledge of violations committed by his employees or from the fact that he has taken reasonable precautions to prevent such violations. There is no requirement . . . that the licensee have knowledge or notice of the facts constituting its violation. [Citations.]

(*Reimel v. Alcoholic Bev. Control Appeals Bd.* (1967) 252 Cal.App.2d 520, 522 [60 Cal.Rptr. 641], internal quotations omitted.)

The doctrine of *respondeat superior* provides that an employer or principal is vicariously liable for the wrongful conduct of his or her employees or agents committed within the scope of the employment or agency. (*Perez v. Van Groningen & Sons, Inc.* (1986) 41 Cal.3d 962, 967 [227 Cal.Rptr. 106].) And, it is well-settled in alcoholic beverage case law that an agent or employee's on-premises knowledge and misconduct is imputed to the licensee/employer. (See *Yu v. Alcoholic Bev. Control Appeals Bd.* (1992) 3 Cal.App.4th 286, 295 [4 Cal.Rptr.2d 280]; *Kirby v. Alcoholic Bev. Control Appeals Bd.* (1973) 33 Cal.App.3d 732, 737 [109 Cal.Rptr. 291].)

Indeed, earlier in *Laube*, the court observed that:

[T]he element of the licensee's knowledge of illegal and improper activity on his or her premises . . . may be either actual knowledge or constructive knowledge imputed to the licensee from the knowledge of his or her employees.

(*Laube, supra*, 2 Cal.App.4th at p. 367, citing *Fromberg v. Dept. of Alcoholic Bev. Control* (1959) 169 Cal.App.2d 230, 233-234 [337 P.2d 123].)

Appellants argue that they should not be punished for a "mere mistake" when they have been diligent in anticipation of reasonably possible unlawful activity and when they can demonstrate that the general conduct of their business meets the minimum standards of decency and morality. (AOB at p. 8.) By this standard, however, any

showing of mitigation efforts by a licensee would negate nearly all departmental discipline — as would appellants' position that the Department is not permitted to impose discipline on a licensee when evidence is lacking to show that the same or similar violations are likely to be repeated or otherwise harm the public. (*Id.* at p. 6.) This is simply not the standard for imposing discipline.

The ALJ discussed the mitigating and aggravating factors considered in determining the penalty in this matter:

The Department requested that the Respondents' license be suspended for 15 days, arguing that any mitigation (e.g., training, prompt termination of the clerk) was offset by aggravating facts (e.g., clerk did not ask to see ID, clerk did not inquire as to minor's age). The Respondents argued that there were a number of factors in mitigation, including the fact that they have been licensed for six years overall, not simply one as alleged by the Department. To some extent, the mitigatory and aggravating factors offset one another. The Respondents are correct that they have six years of discipline-free history which should be taken into account, not just one. The penalty recommended herein complies with rule 144.^[fn.]

(Decision at p. 4,)

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].) "Abuse of discretion" in the legal sense is defined as discretion exercised to an end or purpose not justified by and clearly against reason, all of the facts and circumstances being considered. [Citations.] (*Brown v. Gordon* (1966) 240 Cal.App.2d 659, 666-667 [49 Cal.Rptr. 901].) If the penalty imposed is reasonable, the Board must uphold it even if another penalty would be equally, or even more, reasonable. "If 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].)

Appellants' disagreement with the penalty imposed does not mean the Department abused its discretion. This Board's review of a penalty looks only to see whether it can be considered reasonable, and, if it is reasonable, the Board's inquiry ends there. The Board is simply not empowered to reach a contrary conclusion from that of the Department — and substitute its own judgment — when, as here, the penalty is reasonable, and the decision is supported by substantial evidence.

ORDER

The decision of the Department is affirmed.³

SUSAN A. BONILLA, CHAIR
MEGAN McGUINNESS, 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 shall become effective 30 days following the date of the filing of this order as provided by section 23090.7 of said code.

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

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

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

7-ELEVEN, INC. & JJ CORP
7 ELEVEN STORE 17032F
775 N EAST STREET
ANAHEIM, CA 92805-2150

OFF-SALE BEER AND WINE - LICENSE

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

SANTA ANA DISTRICT OFFICE

File: 20-623297

Reg: 22092336

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 June 26, 2023. 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.

Sacramento, California

Dated: June 27, 2023



Matthew D. Botting
General Counsel

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

IN THE MATTER OF THE ACCUSATION AGAINST:

7-Eleven, Inc. & JJ Corp.
dba 7-Eleven #17032F
775 N. East. St.
Anaheim, California 92805-2150

Respondents

Off-Sale Beer and Wine License

} File: 20-623297
}
} Reg.: 22092336
}
} License Type: 20
}
} Word Count: 10,000
}
} Reporter:
} Erin Winn
} Kennedy Court Reporters
}
} **PROPOSED DECISION**

Administrative Law Judge Matthew G. Ainley, Administrative Hearing Office, Department of Alcoholic Beverage Control, heard this matter at by videoconference on February 27, 2023.

Erin Lovelace, Attorney, represented the Department of Alcoholic Beverage Control.

Adam N. Koslin, attorney-at-law, represented respondents 7-Eleven, Inc. and JJ Corp.

The Department seeks to discipline the Respondents' license on the grounds that, on or about December 20, 2021, the Respondents, through their agent or employee, sold, furnished, or gave alcoholic beverages to Christopher Gonzalez., an individual under the age of 21, in violation of Business and Professions Code section 25658(a).¹ (Exhibit 1.)

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 February 27, 2023.

FINDINGS OF FACT

1. The Department filed the accusation on June 28, 2022.
2. The Department issued a type 20, off-sale beer and wine license to the Respondents for the above-described location on February 2, 2021 (the Licensed Premises).

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

3. There is no record of prior departmental discipline against the Respondents' license.
4. Christopher Gonzalez was born on June 21, 2003. On December 20, 2021, he participated in a minor decoy operation conducted by the Anaheim Police Department. On that date he was 18 years old.
5. Gonzalez appeared and testified at the hearing. On December 20, 2021, he was 5'9" tall and weighed 180 pounds. He wore dark pants and a dark sweatshirt. His hair was short. (Exhibits 2-3 & 5.) His appearance at the hearing was the same except that he was five pounds lighter and his hair was shorter.
6. On December 20, 2021, Gonzalez entered the Licensed Premises. Ofcr. D. Montalvan entered shortly behind him. Gonzalez went to the coolers and selected a 3-pack of Coors Light beer, which he took to the counter. The clerk, Pardeep Sidhu, rang up the beer. Sidhu did not ask to see any ID nor did he inquire as to Gonzalez's age. Gonzalez paid, received some change, and exited with the beer. Ofcr. Montalvan also exited.
7. Ofcr. A. Valdiserri, Anaheim P. D. entered the Licensed Premises. He contacted Sidhu and explained the violation. Gonzalez re-entered the Licensed Premises. Ofcr. Valdiserri asked Gonzalez to identify the person who sold him the beer. At a distance of 3-5 feet, Gonzalez pointed at Sidhu. A photo of the two of them was taken (exhibit 5), after which Sidhu was cited.
8. Ofcr. Valdiserri asked Sidhu if he remembered selling alcohol to Gonzalez. He said that he did. He also said that he did not check ID. Ofcr. Valdiserri testified that he was surprised that the clerk did not check ID because, in his experience, the Licensed Premises was pretty good about doing so.
9. December 20, 2021 was Gonzalez's first time acting as a decoy. Previously, he was a member of the Explorer program for five years.
10. Gonzalez's appearance was consistent with his actual age, 18 years old. Based on his overall appearance, i.e., his physical appearance, dress, poise, demeanor, maturity, and mannerisms shown at the hearing, and his appearance and conduct in the Licensed Premises on December 20, 2021, Gonzalez displayed the appearance which could generally be expected of a person under 21 years of age under the actual circumstances presented to Sidhu.
11. Jagjit Singh, president of co-licensee JJ Corp., manages the Licensed Premises. He has been the franchisee at this location for six years, self-incorporating in 2021. He testified that all employees must undergo online and supervised in-person training. The

Licensed Premises' policy is to ask ID from anyone who appears to be under the age of 30.

12. Sidhu has been employed at the Licensed Premises for approximately 25 years. Although Sidhu has never been lax about checking ID, he was terminated after this incident.

13. 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. Cause for suspension or revocation of the Respondents' license exists under Article XX, section 22 of the California State Constitution, and sections 24200(a) and (b) on the basis that, on December 20, 2021, the Respondents' employee, Pardeep Sidhu, inside the Licensed Premises, sold an alcoholic beverage to Christopher Gonzalez, a person under the age of 21, in violation of Business and Professions Code section 25658(a). (Findings of Fact ¶¶ 4-10.)

5. The Respondents argued that they should not be held responsible for the clerk's actions in this case. The Respondents noted that they had significant policies in place to prevent the sales of alcohol to minors and that these policies were so effective that even one of the officers expressed surprise that the sale occurred.

6. This argument is rejected. The doctrine of *respondeat superior* is well established in California law, particularly as it relates to actions which are part and parcel of an employee's job. Not only was selling alcohol part of Sidhu's job, it was the very activity which was licensed by the Department.

7. This fact, among others, distinguishes the present case from *Santa Ana Food Market, Inc. v. Alcoholic Beverage Control Appeals Board*.² In that case, a clerk used her own funds to purchase food stamps at a discount. The licensee had extensive policies designed to prevent any violations of the law. The employee not only took great pains to circumvent those policies, but hid her illegal actions from the licensee. The court dismissed the accusation on the grounds that, under the circumstances, it was inappropriate to hold the licensee responsible for the employee's actions.

PENALTY

The Department requested that the Respondents' license be suspended for 15 days, arguing that any mitigation (e.g., training, prompt termination of the clerk) was offset by aggravating facts (e.g., clerk did not ask to see ID, clerk did not inquire as to minor's age). The Respondents argued that there were a number of factors in mitigation, including the fact that they have been licensed for six years overall, not simply one as alleged by the Department. To some extent, the mitigatory and aggravating factors offset one another. The Respondents are correct that they have six years of discipline-free history which should be taken into account, not just one. The penalty recommended herein complies with rule 144.³

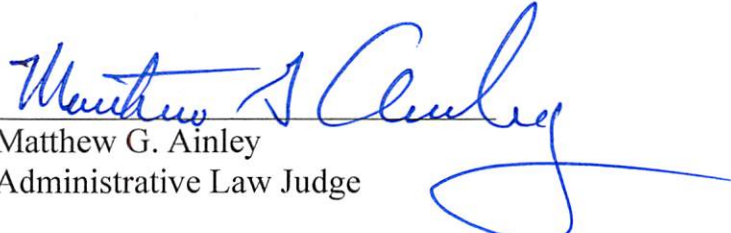
² 76 Cal. App. 4th 570, 90 Cal. Rptr.2d 523 (1999).

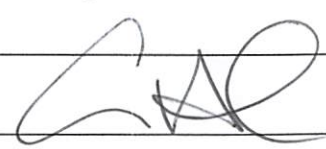
³ All rules referred to herein are contained in title 4 of the California Code of Regulations unless otherwise noted.

ORDER

The Respondents' off-sale beer and wine license is hereby suspended for a period of 10 days.

Dated: May 4, 2023


Matthew G. Ainley
Administrative Law Judge

<input checked="" type="checkbox"/> Adopt
<input type="checkbox"/> Non-Adopt: _____
By:  _____
Date: <u>06/26/23</u>

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

7-ELEVEN, INC. & JJ CORP.,
dba 7-Eleven Store #17032F
775 North East Street
Anaheim, CA 92805-2150,
Appellants/Licensees,

v.

DEPARTMENT OF ALCOHOLIC
BEVERAGE CONTROL,
Respondent.

) AB-9975
)
) File: 20-623297
) Reg: 22092336
)

**DECLARATION OF SERVICE
BY E-MAIL**

I, MARIA SEVILLA, declare that I am over the age of eighteen (18) years, and not a party to the within action; that my place of employment and business is 400 R Street, Suite 320, Sacramento, CA; that on the 7th day of November, 2023, I served a true copy of the attached **Decision** of the Alcoholic Beverage Control Appeals Board in the above-entitled proceeding on each of the persons named below:

BY E-MAIL OR ELECTRONIC TRANSMISSION: Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent to the person(s) at the e-mail address(es) listed below:

Ralph Barat Saltsman
Solomon, Saltsman & Jamieson
426 Culver Boulevard
Playa Del Rey, CA 90203
rsaltsman@ssjlaw.com

Department of ABC
Office of Legal Services
3927 Lennane Drive, Suite 100
Sacramento, CA 95834
yuri.jafarinejad@abc.ca.gov

I declare under penalty of perjury that the foregoing is true and correct. Executed at Sacramento, California, on the 7th day of November 2023.

MARIA SEVILLA