DISTRICT OF COLUMBIA

ALCOHOLIC BEVERAGE CONTROL BOARD

MEETING

IN THE MATTER OF:

2737 Sherman Ave NW, LLC,
t/a Hilltop Bar &
Restaurant
2737 Sherman Ave NW
Retailer CT - ANC 1B
License No. 94002
Case #19-CMP-00020

(Allowed a Third Party to:
Operate the Business
Without Board Approval,
Trade Name Change without:
Board Approval)

Wednesday,
April 24, 2019

The Alcoholic Beverage Control Board
met in the Alcoholic Beverage Control Hearing
Room, Reeves Building, 2000 14th Street, N.W.,
Suite 400S, Washington, D.C. 20009, Chairperson
Donovan W. Anderson, presiding.

PRESENT:

DONOVAN W. ANDERSON, Chairperson
NICK ALBERTI, Member
BOBBY CATO, JR., Member
MIKE SILVERSTEIN, Member
JAMES SHORT, Member
REMA WAHABZADAH, Member
ALSO PRESENT:

SAM JAHANBEEN, Licensee
CHAIRPERSON ANDERSON: We are back on the record. Our next case is Case No. 19-CMP-00020, Hilltop Bar & Restaurant, License No. 94002.

Will the parties, please, approach and identify themselves for the record, please?

MR. JAHANBEEN: I'm Sam Jahanbeen, owner of 2737 Sherman Avenue, N.W., LLC, trade name is Hilltop Bar & Restaurant.

CHAIRPERSON ANDERSON: Okay. Good afternoon.

MR. JAHANBEEN: Good afternoon, sir.

CHAIRPERSON ANDERSON: All right. No, I'm sorry, good morning.

All right. This is a Fact-Finding Hearing that we have, one of the reasons why we have brought you here today is that -- and maybe you can for the record clear up what was going on.

Apparently, when our Investigator went
to the establishment, apparently when the
establishment -- or the Investigator went to the
establishment, we recognized the fact that there
was -- someone identified himself as an owner.
And we recognize the fact that there is a
different menu. We also recognize the fact that
there was a different name.

And it would appear that, at some
point, a Management Agreement was provided to the
Agency stating that you had a Management
Agreement with this person who said that they
were the owner, that you had authorized the menu,
that you had authorized the trade name.

And so whether or not you had
authorized it or not, it doesn't become official
until it is approved through our Agency.

So can you tell us then as far as the
operation of your business, the trade name and
where are we from your perspective, sir?

MR. JAHANBEEN: Yeah, everything you
said is correct. I also think the Investigator
did another -- visited a few days after and I was
there as well and we had a conversation and we
kind of discussed everything and I had submitted
the information he requested.

We had a subsequent phone call.

CHAIRPERSON ANDERSON: Can you be
specific? Tell me what you submitted. Who
called you?

MR. JAHANBEEN: So what you had said
is all accurate. Again, a few days later the
Investigator had come by. He had seen me. We
had discussed the same things that you had
pointed out and I had explained to him that I
have a management agreement with this individual.
I have subsequently had a conversation with this
individual about the liabilities of representing
himself as the owner.

I think a lot of it kind of just was
more of an ego thing, okay, I'm running -- I'm on
the floor. I'm running things. Yes, I'm the
owner. I kind of told him about, you know, we
had a conversation about, you know, properly
representing himself because of the liabilities
of misrepresenting himself.

I provided the management agreement to the Investigator, went through the details of the day-to-day operations, my involvement in -- on the day-to-day basis, my manager's involvement, according to our agreement, on a day-to-day basis.

I completely made -- I mean, we failed to failed to update the trade name. What happened is that we had opened up in late 2016 under The Hilltop, ran it for a year. Response, because it was a little more bar-driven in the neighborhood, it was not doing well. There tends to be a bit of a food desert, so we wanted to revamp and we opened with a heavier food concept and we subsequently did within another year.

Part of the reason I entered this into the arrangement is because this individual is an expert in food. And what I -- again, 100 percent failing to do was to notify the Board on the name change and the concept change and I failed to even update my DCRA Licenses.
Since then, I have updated the trade name. Well, I apologize, I have since then have registered the trade name. I have filed with DCRA to get the Certificate of Occupancy updated, which I have a copy of it here. And I have my business license application submitted with the new Certificate of Occupancy to have the business license trade name. The trade name on the business license updated as well.

With the next steps being to then submit those two along with everything else to the Board pending what happens here.

CHAIRPERSON ANDERSON: So when is it that you plan to provide all of this information to the Agency?

MR. JAHANBEEN: As soon as I get the business license updated. I believe my next step, if I remember the steps correctly, is to get the patio license updated as well. So the ownership is the same. It's just the trade name is all incorrectly registered, because I failed to update that.
So once I get those three pieces with the updated trade name, my plan is to come in and submit. Hey, here are all my correct licenses. Here is the updated menu. I think reasonably within four weeks max, I think it could be done, because these are just really administrative changes, according to DCRA to update the name also.

CHAIRPERSON ANDERSON: So you believe that within the next 30 days, you should be able to provide this information to the Board?

MR. JAHANBEEN: Pending any major hold-ups at DCRA with regards to the business license. I already have the Certificate of Occupancy, the trade name registered. So --

CHAIRPERSON ANDERSON: Did you -- have you -- are you able to provide us with a copy of that?

MR. JAHANBEEN: Absolutely. I had the original C of O, I wouldn't need that, but I think I can get a copy of it. One moment.

CHAIRPERSON ANDERSON: So tell me what
you are providing us, please.

MR. JAHANBEEN: So I'm providing you a copy of the registration of the trade name.

CHAIRPERSON ANDERSON: Okay.

MR. JAHANBEEN: A copy of the updated Certificate of Occupancy that has the updated trade name on there.

CHAIRPERSON ANDERSON: Okay.

MR. JAHANBEEN: And then I have my business license application. I'm going to submit that this week. And I'll receive an updated business license, at which point then I can use these three to go to the Department of Transportation to update my cafe patio permit.

CHAIRPERSON ANDERSON: Okay, okay.

MR. JAHANBEEN: And then once I have those three --

CHAIRPERSON ANDERSON: So why don't you give her the application.

MR. JAHANBEEN: And then once I have the -- I have the Certificate of Occupancy. Once I have the business license and an updated DDOT
Cafe permit, I could bring those three here with the updated menu and --

    MEMBER SHORT: Can I ask a question?

    CHAIRPERSON ANDERSON: Well, hold on.

    MR. JAHANBEEN: -- submit an application for your approval for the updated ABRA License.

    CHAIRPERSON ANDERSON: Okay. Go ahead, Mr. Short.

    MEMBER SHORT: So good afternoon or good morning still.

    Are you talking about your basic business license?

    MR. JAHANBEEN: Correct.

    MEMBER SHORT: You don't have one now?

    MR. JAHANBEEN: I do have one now. And I have all those licenses now, they are just --

    MEMBER SHORT: Okay.

    MR. JAHANBEEN: -- registered under the old trade name.

    MEMBER SHORT: All right. Okay.
MR. JAHANBEEN: I'm just going to update the trade name on it.

MEMBER SHORT: So everything is up and up, just getting it changed?

MR. JAHANBEEN: Just the trade name, yeah. And I believe that was a red flag. When the Investigator came in, I mean, it was a major oversight on our end. He came in. He saw Napoli on the wall and he sees the license that has a completely different trade name on it. And I understand that was a major screw up on our end.

So you know, again, we are taking steps to update those things accordingly.

MEMBER SHORT: Thank you. That's all I have.

CHAIRPERSON ANDERSON: I know that you haven't -- so the Management Agreement that you have is still in place?

MR. JAHANBEEN: Yeah, absolutely. I mean, he is an important member of just kind of keeping the food coming out of the kitchen, you know. I mean, that's why I brought him on board.
CHAIRPERSON ANDERSON: So who purchases -- when alcohol is purchased, who purchases the alcohol?

MR. JAHANBEEN: It depends on who is like in on the front line in that situation during that time. Typically, I mean, he runs most of the floor and the ordering and the receiving, so a lot of times he will do the purchasing. I do purchases, it depends, but he essentially will -- it just depends on who is doing what.

CHAIRPERSON ANDERSON: So who --

MR. JAHANBEEN: Most of the time it's him, because again he is the guy that is opening and closing.

CHAIRPERSON ANDERSON: So where are you purchasing the alcohol from?

MR. JAHANBEEN: Our vendors primarily, which are Premium, Republic National.

CHAIRPERSON ANDERSON: And so when the checks -- I mean, how do you guys pay for it?

MR. JAHANBEEN: By -- well, we
typically have accounts with these vendors, so they send us a monthly invoice based on our purchases and we cut a check.

MEMBER ALBERTI: I think the real question is --

CHAIRPERSON ANDERSON: Mr. Alberti?

MEMBER ALBERTI: -- which account is--

MR. JAHANBEEN: Oh.

MEMBER ALBERTI: -- where is the account and who is the owner of the account that is paying for this?

MR. JAHANBEEN: Oh, okay, okay.

MEMBER ALBERTI: Where is the money coming form?

MR. JAHANBEEN: Oh, okay, okay. So we both have -- so we both have SunTrust accounts, business accounts at SunTrust. And we will cut a check depending on who is processing it. Again, we reconcile everything as seller accounts at the end of the month.

MEMBER ALBERTI: But, no. Is it --

MR. JAHANBEEN: Typically, it is --
most of the time, I would say about 90 percent of
the time it will be him, because he is the one
kind of --

MEMBER ALBERTI: His account?

MR. JAHANBEEN: His business account,
yes.

CHAIRPERSON ANDERSON: But he is not--
this is the problem. You are the owner. It has
to come out of your account. It can't come out
of his, because without saying what I -- it's the
business. It has to be your business. It can't
be his business.

MR. JAHANBEEN: Understood. So the
logic behind that was --

CHAIRPERSON ANDERSON: It's not the
logic behind this.

MR. JAHANBEEN: I want you to
understand what our thinking was.

CHAIRPERSON ANDERSON: It can't be.
I don't want you to tell me what your thinking
is.

MR. JAHANBEEN: And you can tell me my
thinking is wrong. I just want you to hear.

CHAIRPERSON ANDERSON: Right. And
that's why I don't want you to tell me what your
thinking is.

MR. JAHANBEEN: Okay.

CHAIRPERSON ANDERSON: For your own
protection.

MR. JAHANBEEN: Sure.

CHAIRPERSON ANDERSON: It cannot be
out of his account. It has to be out of your --
you have to -- you can't share profits. If you
have a Management Agreement, the Management
Agreement you are paying a person's salary, you
can't share the profits with an employee. It is
your business. You are supposed to purchase
alcohol from your -- the business account, not
his.

MR. JAHANBEEN: Understood.

CHAIRPERSON ANDERSON: So if it is
coming from this other person's account, then he
has ownership stake, he has ownership.

I know what you are thinking and I
know where you are. And so I'm like I'm trying
to tell you --

MR. JAHANBEEN: Yeah.

CHAIRPERSON ANDERSON: -- that what
you are thinking is faulty. I don't want you to
tell me.

MR. JAHANBEEN: Are you sure, because
I'm in --

CHAIRPERSON ANDERSON: And I don't
want --

MEMBER ALBERTI: The assumption is if
it is coming out of his business account, then
the proceeds from this business, from your
business are going to him.

(Simultaneous speaking)

MR. JAHANBEEN: Well --

MEMBER ALBERTI: And that is not
really -- that is not supposed to be happening.

MR. JAHANBEEN: -- he is incentivized
by margins and that's --

MEMBER ALBERTI: That's fine, that's
fine.
MR. JAHANBEEN: -- so that's --

MEMBER ALBERTI: But the money from
the business cannot directly go to him. Your
Management Agreement can give him a percentage.
His performance can be based on a percentage of
the sales.

MR. JAHANBEEN: Yes.

MEMBER ALBERTI: Whatever you want to
do, but the money from the business, because you
own it --

MR. JAHANBEEN: Yeah.

MEMBER ALBERTI: -- cannot go directly
to him.

MR. JAHANBEEN: But it's the
expenditure.

CHAIRPERSON ANDERSON: No.

MR. JAHANBEEN: So okay, let's say the
submissions will then -- you are stating that I
need to essentially run everything through -- I
cannot let him touch any of the money. It needs
to run through -- run under my name or the
business name only?
MEMBER ALBERTI: Yes.

MR. JAHANBEEN: Okay.

MEMBER ALBERTI: Otherwise it appears --

MR. JAHANBEEN: If that is the only way, I have no choice but to --

MEMBER ALBERTI: -- as if he is sharing in the profits of the business --

MR. JAHANBEEN: Understood.

MEMBER ALBERTI: -- directly and that is not allowed under the law.

MR. JAHANBEEN: Okay.

MEMBER ALBERTI: So I know this is all technical, but you've got to --

MR. JAHANBEEN: Regardless of our arrangement in profit-sharing incentivizing, that is --


MR. JAHANBEEN: -- my problem.

Understood. Okay. I get it.

CHAIRPERSON ANDERSON: But as far as
he cannot -- he -- you can't have -- that's one
of -- the question I asked you like okay, who is
paying for the alcohol? So when the checks are
being written, okay, the checks should be written
from the business account, your business account.

MR. JAHANBEEN: Yeah.

CHAIRPERSON ANDERSON: Because, okay,
if we do books and records, okay, we are going to
ask you for the receipts. All right. Who is
this person?

MEMBER ALBERTI: So I know that some
businesses what they do is that they open a
separate account for the business, all right, and
the person who has the Management Agreement could
be a signature on that account.

MR. JAHANBEEN: Yeah.

MEMBER ALBERTI: And that would ease
things. He can sign all the checks from that
account, but it's still -- the account is still
your business' account.

MEMBER SHORT: The business.

MR. JAHANBEEN: And --
MEMBER ALBERTI: And that's where the proceeds from the business are going.

MR. JAHANBEEN: -- yeah, and so --

MEMBER ALBERTI: Okay.

MR. JAHANBEEN: -- I am a signer on his account, just to maintain access to --

MEMBER ALBERTI: But you don't own it?

MR. JAHANBEEN: -- it needs to go the other way.

MEMBER ALBERTI: But you don't own it?

MR. JAHANBEEN: I can supervise --

MEMBER ALBERTI: It needs to go the other way.

MR. JAHANBEEN: -- because I didn't want him access to the primary account. As a man, I just -- we are just, you know, in a bit of a trust thing. I didn't want him access to the primary account where all the money is.

MEMBER ALBERTI: Well, open up a credit account, open a separate account.

MR. JAHANBEEN: Yeah, you're right.

MEMBER ALBERTI: I mean, there are
ways to make this work.

MR. JAHANBEEN: I think the solution is we need to open up a joint account with both our entities on there and if that -- do you think that would make sense or no?

CHAIRPERSON ANDERSON: I can't give you legal advice.

MEMBER ALBERTI: Right.

CHAIRPERSON ANDERSON: So I can't -- and maybe you need to sit down with someone from licensing from this -- I think that Mr. Gordy was here or Ms. Jackson and you need to sit down with someone and just -- an informational meeting.

MR. JAHANBEEN: Yeah.

CHAIRPERSON ANDERSON: The goal of this Agency is not to get you. It's to educate you.

MR. JAHANBEEN: I have learned that, which has been, I think, nice, because when an Investigator came in, we were like oh, may God, we're going to get shut down until this gets resolved.
MEMBER ALBERTI: All right. All right.

MR. JAHANBEEN: He made it very clear that that is not his intent.

CHAIRPERSON ANDERSON: I'm glad, right.

MR. JAHANBEEN: And that was really he just said, listen, you are just going to have to sort this out. No one is going to shut you guys down.

CHAIRPERSON ANDERSON: And what you need to do and you are here today is to sit down with someone in our Licensing Division, talk to them about your business model, what is it -- how you envision to operate your business and they can provide you some guidance. I can't do it from the Board.

MR. JAHANBEEN: Yes.

CHAIRPERSON ANDERSON: But in that stead, sitting -- it's informational.

MR. JAHANBEEN: Um-hum.

CHAIRPERSON ANDERSON: That they can
guide you to say this is what the law says and
this is what you need to do to operate, so you
are in compliance with the ABRA Laws.

MR. JAHANBEEN: Okay.

CHAIRPERSON ANDERSON: And I don't
want you to put out on the record what your
vision is. My job is not -- I'm not trying to
get you.

MR. JAHANBEEN: Yes.

CHAIRPERSON ANDERSON: So that's one
of the reasons why I said no, I kind of figure
the way -- your vision is not legal, so
therefore, I don't want you to put it on the
record to say this is my vision, so we have a
transcript.

MR. JAHANBEEN: Okay.

CHAIRPERSON ANDERSON: That's why.

MR. JAHANBEEN: Okay.

CHAIRPERSON ANDERSON: And if later on
if something else comes, then we can say pull the
transcript, this is what you said.

MR. JAHANBEEN: Okay.
CHAIRPERSON ANDERSON: So I'll stop you while you are ahead.

MR. JAHANBEEN: Appreciate it. Thank you.

CHAIRPERSON ANDERSON: Okay. So but by having a conversation with licensing, that's a conversation you are having with licensing and they will explain to you what the process is.

MR. JAHANBEEN: That would be Mrs. Jackson?

CHAIRPERSON ANDERSON: Ms. Jackson or Mr. Gordy, who I think you spoke to him, but Ms. Jackson, you have her contact, then you can make an appointment to sit with her and discuss. Now, you can be very honest with her.

MR. JAHANBEEN: Okay.

CHAIRPERSON ANDERSON: Okay. Because it is with her.

MR. JAHANBEEN: Yeah.

CHAIRPERSON ANDERSON: So you can tell her everything that you are doing with her.

MR. JAHANBEEN: And she will tell us
what we need to do?

    CHAIRPERSON ANDERSON: And she will
let you know what it is that you need to do.

    MR. JAHANBEEN: Okay.

    CHAIRPERSON ANDERSON: Because it's
our Agency. We know the law and we are advising
business folks. You don't -- you might not
necessarily know the law, but from our
perspective, we will let you know what it is that
you should -- what are the do's and don'ts.

    MR. JAHANBEEN: Okay.

    CHAIRPERSON ANDERSON: I appreciate
the fact that you provided us a Management
Agreement, but the Management Agreement that you
provided us, it's -- which I read was just like
no, you are violating the law.

    MR. JAHANBEEN: Okay.

    CHAIRPERSON ANDERSON: Although, you
were very honest, you put everything out there,
it's just what we are doing, everything that was
done is fine. We have this agreement, but all of
that needed to be approved by the Agency before.
MR. JAHANBEEN: Understood.

CHAIRPERSON ANDERSON: In the sense of the trade name, I don't believe that we have a -- we are not concerned with -- I don't believe that we are going to tell you what kind of food, what's on your menu.

MR. JAHANBEEN: Yeah.

CHAIRPERSON ANDERSON: So that's not the -- we don't get into that part.

MR. JAHANBEEN: Okay.

CHAIRPERSON ANDERSON: But we do get into the name and we do get into the ownership.

MR. JAHANBEEN: Okay.

CHAIRPERSON ANDERSON: Do you have any questions for us? Any other questions for us?

MR. JAHANBEEN: So as for next steps, it seems like I just need to work with Ms. Jackson to --

CHAIRPERSON ANDERSON: Yes.

MR. JAHANBEEN: -- come to a reasonable conclusion to -- for resolving these issues.
CHAIRPERSON ANDERSON: Right.

MR. JAHANBEEN: And then I guess once I have met her requirements --

CHAIRPERSON ANDERSON: All right.

MR. JAHANBEEN: -- we will be kind of coming. What are the next steps?

CHAIRPERSON ANDERSON: All right. I'm going to give you 30 days to get this all together.

MR. JAHANBEEN: Okay.

CHAIRPERSON ANDERSON: And we will -- the Agency, we, the Board, could revisit this in 30 days to see what steps you have taken. You need to meet with Ms. Jackson. Meet with Ms. Jackson and figure out what needs to be done. And all of that needs to be done within the next 30 days.

MR. JAHANBEEN: Understood. And when those things are, let's say, completed in terms of acknowledgement from ABRA that hey, I have met this requirement, would Ms. Jackson essentially tell me hey, you have addressed what you need to,
I'll hand this off to the Board to review? I just want to know what --

CHAIRPERSON ANDERSON: If there is a trade name, so if there is a trade name, then that will be done. Then it comes to the Board and the Board approves the trade name.

MR. JAHANBEEN: Okay.

CHAIRPERSON ANDERSON: And so yeah.

MR. JAHANBEEN: Okay. So she will be my kind of gatekeeper on all this.

CHAIRPERSON ANDERSON: Yes, either her or someone in -- you start with her or it might be assigned to a licensing specialist within that division to work with you to make sure everything is fine.

MR. JAHANBEEN: Okay, great.

CHAIRPERSON ANDERSON: All right. So what we will do is that we will keep the report open and once -- and we will revisit this issue. And if you have done what you are supposed to do, because I -- it appears that you are trying to do what is right and this is not a got you Agency.
MR. JAHANBEEN: Yes.

CHAIRPERSON ANDERSON: So --

MR. JAHANBEEN: I really appreciate that. This is again very much a relief to know that there is a sense of cooperation between the Agency and businesses, so that's the case.

CHAIRPERSON ANDERSON: All right.

Okay. So we will give you 30 days to do it.

MR. JAHANBEEN: Okay.

CHAIRPERSON ANDERSON: And if it's not, then -- though I don't want to have the pleasure of seeing you again.

MR. JAHANBEEN: No, I --

CHAIRPERSON ANDERSON: Because I won't be --

MR. JAHANBEEN: -- think that's a reasonable time. I don't think we will have any issues in addressing this with DCRA and getting everything in order. And I'll be sending Ms. Jackson a call and email today.

CHAIRPERSON ANDERSON: All right. All right. So thank you for being here today.
MR. JAHANBEEN: Thank you. My -- oh, I got these back. Thank you.

CHAIRPERSON ANDERSON: We got copies and you have your originals back.

MR. JAHANBEEN: Okay. Wonderful.

Thank you, everyone.

CHAIRPERSON ANDERSON: All right.

Thank you.

MEMBER SILVERSTEIN: Thank you.

(Whereupon, the Fact-Finding Hearing was concluded at 11:50 a.m.)
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In the matter of: Hilltop Bar and Restaurant

Before: DC ABRA

Date: 04-24-19

Place: Washington, DC

was duly recorded and accurately transcribed under my direction; further, that said transcript is a true and accurate record of the proceedings.

[Signature]
Court Reporter