LICENSE NOs. 0806-32-005-003 0313-44-029-003 65842

AGENCY DKT. NOs. S-18-38421; H-2018-51349 S-18-38713; H-2018-51393 S-18-38323; H-2018-51235 S-19-38523; H-2019-50144 S-19-39050; H-2019-51351 S-19-38916; H-2019-51143

DIVISION OF ALCOHOLIC BEVERAGE CONTROL,)	
Petitioner,)	CONSENT ORDER
v.	,)	CONSENT ORDER
LANDMARK EWING LLC	,	
t/a LANDMARK; ZAGAMI LLC)	
t/a LANDMARK AMERICANA)	
LANDMARK LIQUORS; CGM WINES	j	
LLC t/a WINEWORKS,	j	
)	
Respondents.)	
` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` `		

Richard E. Karczewski, Jr., Deputy Attorney General Attorney for the Division of Alcoholic Beverage Control (Gurbir S. Grewal, Attorney General, attorney)

Lori Grifa, Esq.
William C. Fay IV, Esq.
Attorneys for the Respondent

BY THE ACTING DIRECTOR:

This matter having been brought before the Acting Director, the Division of Alcoholic Beverage Control ("Division") represented by Gurbir S. Grewal, Attorney General of New Jersey (Richard E. Karczewski, Jr., Deputy Attorney General, appearing) and with notice to

Landmark Ewing LLC, Zagami LLC and CGM Wines LLC License Nos. 0806-32-005-003, 0313-44-029-003 and 65842 Agency Dkt. Nos. S-18-38421; H-2018-51349, S-18-38713; H-2018-51393, S-18-38323; H-2018-51235, S-19-38523; H-2019-50144, S-19-39050; H-2019-51351, S-19-38916; H-2019-51143

Respondents, holders of License Nos. 0806-32-005-003 and 0313-44-029-003 and Permit No. 65842, and this matter having been amicably settled prior to hearing:

parties that:

IT IS on this 24 day of Sept

2020, hereby ORDERED with consent of the

- Respondents hereby withdraw their not guilty plea to the Charges under Agency Dkt. S-1. 18-38421; H-2018-51349, S-18-38713; H-2018-51393, S-18-38323; H-2018-51235, S-19-38523; H-2019-50144, and hereby enters a plea of non-vult to all charges, thereby waiving the right to any hearing or appeal whatsoever in connection with these charges.
- Respondent hereby enters a plea of non-vult to the Notice of Charges under Agency Dkt. 2. S-19-39050; H-2019-51351 and S-19-38916; H-2019-51143, thereby waiving the right to any hearing or appeal whatsoever in connection with these charges. The Notice of Charges are attached to this Order as Exhibit A.
- 3. In return for Respondents' non-vult plea, revocation of License Nos. 0806-32-005-003 and 0313-44-029-003 and Permit No. 65842 will not be sought and the Acting Director will hereby indefinitely suspend Lic. No. 0806-32-005-003 on October 1, 2022 at 12:01 a.m. and shall continue indefinitely until vacated by Order of the Acting Director.
- The Respondent can petition to the Acting Director to vacate the suspension and to accept 4. a monetary compromise in lieu of suspension, if the Respondents and all of its principles divest their interests in Lic. No. 0806-32-005-003 to a bona fide third-party purchaser and the Respondents and their principles have no interest as landlord in the property where Lic. No. 0806-32-005-003 is sited. A monetary compromise offer shall be in the amount of \$550,000.00.

The amount is payable by certified check or attorney's trust account check to Division of Alcoholic Beverage Control bearing the numbers S-18-38421; H-2018-51349, S-18-38713; H-2018-51393, S-18-38323; H-2018-51235, S-19-38523; H-2019-50144, S-19-39050; H-2019-51351 and S-19-38916; H-2019-51143, and sent to:

> Division of Alcoholic Beverage Control Attn: Denise Farfalla, Enforcement Bureau 140 E. Front Street, P.O. Box 087

Landmark Ewing LLC, Zagami LLC and CGM Wines LLC License Nos. 0806-32-005-003, 0313-44-029-003 and 65842 Agency Dkt. Nos. S-18-38421; H-2018-51349, S-18-38713; H-2018-51393, S-18-38323; H-2018-51235, S-19-38523; H-2019-50144, S-19-39050; H-2019-51351, S-19-38916; H-2019-51143

Trenton, New Jersey 08625-0087

- 5. Effective immediately, Respondents agree to operate Lic. No. 0806-32-005-003 ("Landmark Glassboro") with the following restrictions:
 - Respondents shall operate Landmark Glassboro on-premise consumption area as a "restaurant" as defined under N.J.S.A. 33:1-1t only;
 - All alcoholic beverages shall be sold, delivered and dispensed in accordance with. industry standards (a five-ounce pour for wine, a twelve-ounce bottle or can for malt alcoholic beverages, a sixteen.-ounce draft pour for malt alcoholic beverages). Cocktails and mixed drinks shall not contain more than two ounces of distilled spirits. Cocktail or drink recipes that call for more than one liquor will reflect and shall not exceed the measured proportions (i.e. martinis and manhattans) of distilled spirits of said cocktail or drink recipes. Beverages that are purchased from wholesalers and are sold from original, individual containers, such as beer bottles or cans, may be served in the portion size found in the original container.
 - Respondents shall not avail itself of the privileges as outlined in N.J.A.C. 13:2-23.16(a)2. Specifically, Respondent agrees not to permit the practice of offering patrons one free drink as a good will gesture and/ or coupons, tickets or tokens to redeem a free drink.
 - Respondents agree not to use the "nightclub room" except for private parties not open to the general public or dining;
 - No amplified music or live DJ;
 - Sale of alcoholic beverages on the licensed premises shall end at 12:00 a.m. and impose a "last call" at 11:30 p.m.
- 6. The restrictions on the operation of Landmark Glassboro shall remain in effect until Landmark Glassboro is indefinitely suspended or Landmark Glassboro is sold to a bona

Landmark Ewing LLC, Zagami LLC and CGM Wines LLC License Nos. 0806-32-005-003, 0313-44-029-003 and 65842 Agency Dkt. Nos. S-18-38421; H-2018-51349, S-18-38713; H-2018-51393, S-18-38323; H-2018-51235, S-19-38523; H-2019-50144, S-19-39050; H-2019-51351, S-19-38916; H-2019-51143

fide third-party purchaser and the Respondents and their principles are no longer landlords where Landmark Glassboro is sited.

- 7. In the event that the Respondents and their principles divest their interests in Landmark Glassboro, the Respondents agree that they are prohibited from ever reacquiring the license.
- 8. In addition, Respondents have forfeited Permit No.65842 to the Division which is hereby acknowledged.
- 9. Respondent hereby waives all rights to further hearings and appeals and to the repossession or return of any alcoholic beverages or evidence, as well as any cash or any other personalty seized in connection with the investigation of this matter, excluding books and records of the licensed business, and Respondent consents to the forfeiture of same and disposition by the Director in accordance with the provisions of N.J.S.A. 33:1-66 and/or N.J.S.A. 2C:64-1, et seq. Respondent shall contact Kevin T. Barber, Chief, Investigations Bureau, at (609) 984-2648, no later than 30 days from the date of this Order, to arrange a date upon which Respondent can pick up the books and records of the licensed business. Respondent's failure to do so shall be deemed consent to the destruction of those records by the Division.
- 10. This Consent Order, terms thereunder, and conditions imposed are hereby attached to this license. Hence, the existing license and any prospective or subsequent transferee of this license takes and are bound by the terms and conditions imposed herein.

AMES B. GRAZIANO
ACTING DIRECTOR

Landmark Ewing LLC, Zagami LLC and CGM Wines LLC License Nos. 0806-32-005-003, 0313-44-029-003 and 65842 Agency Dkt. Nos. S-18-38421; H-2018-51349, S-18-38713; H-2018-51393, S-18-38323; H-2018-51235, S-19-38523; H-2019-50144, S-19-39050; H-2019-51351, S-19-38916; H-2019-51143

We are authorized and	o hereb	y consent to the entry,	form and substance	of the above Order.
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Ву:		Dated:	9/22/20
	Richard E. Karczewski, Jr.	_ 。	

Deputy Attorney General
On Behalf of Petitioner

On Behalf of Respondents

On Behalf of Respondents



State of New Jersey

PHILIP D. MURPHY Governor

SHEILA OLIVER Lt. Governor

OFFICE OF THE ATTORNEY GENERAL DEPARTMENT OF LAW AND PUBLIC SAFETY DIVISION OF ALCOHOLIC BEVERAGE CONTROL P.O. BOX 087

TRENTON, NJ 08625-0087

Phone: (609) 984-2830 Fax: (609) 633-6078 HTTP://WWW.NJ.GOV/LPS/ABC GURBIR S. GREWAL Attorney General

JAMES B. GRAZIANO
Acting Director

JUL 2 8 2020

Zagami LLC t/a Landmark Americana Landmark Liquors 1 E Mullica Hill Rd Glassboro, NJ 08028 LICENSE NO.: 0806-32-005-003

AGENCY DKT. NO.: S-19-39050, H-2019-51351;

ISSUED BY: Mayor and Council of Glassboro

Borough, Gloucester County

Attached hereto is a copy of the Notice of Charges wherein the Division of Alcoholic Beverage Control ("Division") has alleged that the holder of this license has committed the violations set forth therein and is seeking to revoke your license. Upon receipt of this letter you must enter either a guilty, non-vult or not guilty plea to these charges within 30 days. Failure to enter a plea within the 30-day period shall be deemed to be a statement that you do not contest the charges, which are the subject of this matter. Consequently, if a plea is not entered within the 30-day period, a non-vult plea will be entered on your behalf unless the plea period has been extended by the Division. The Director upon certification from the Division may suspend or revoke your license without further opportunity for you to oppose the charges.

Before entering a plea you may request a copy of the Report of Investigation on which the charges were based and request an additional 14 days to examine the report before you enter a plea. As set forth on the "plea" page, the cost for the report is \$50.00. To receive such reports send a money order or check made payable to the New Jersey Division of Alcoholic Beverage Control. Send your request to Deputy Attorney General, Andrew R. Sapolnick and include the license number and "S" number on all letters and forms of payment.

You are entitled to have an attorney advise you. However, consultation with an attorney will not toll or stop the time of the 30 days for you to enter your plea.

Please be advised if there is a determination of guilt to the charges, the Enforcement Bureau pursuant to N.J.S.A. 33:1-31 will seek revocation and will also seek the forfeiture and disposal of any cash, evidence, alcoholic beverages (or other <u>prima facie</u> contraband nature) seized in connection with these charges.



If you enter a plea of guilty or <u>non-vult</u> (not contesting the charges) you have informed the Division that you do not dispute the charges in this matter and will accept the penalty as set forth. You do have the right to submit in writing mitigating circumstances and requesting the charges be reduced in penalty. In cases in which ABC seeks suspension, the Director may also consider reduction of the penalty by 20% in consideration of your guilty or <u>non-vult</u> plea. In cases in which ABC seeks revocation, the Director may accept a monetary offer and/or suspension in lieu of revocation.

In addition, you have the right to make application to the Director that he accept a monetary compromise offer in lieu of the days suspended pursuant to N.J.A.C. 13:2-19.12.

If you plead not guilty, this case will be sent to the Office of Administrative Law or be retained to be heard before the Director. You or your attorney will receive the necessary notice that the case has been forwarded and the time and place of the hearing.

To assist you in responding to the Division, you may use the "plea" page to advise us of your decision in this matter. If you do utilize this form, after you fill it out we suggest you make a copy and keep it for your records. Please send this reply to DAG Andrew R. Sapolnick.

Very truly yours,

GURBIR S. GREWAL

ATTORNEY GENERAL OF NEW JERSEY

By:

Andrew R. Szpolnick

DEPUTY ATTORNEY GENERAL

Attachment



	AGENCY NO.: S-19-39050, H-2019-51351;
DIVISION OF ALCOHOLIC BEVERAGE CONTROL,))
Petitioner,	
v.	
Zagami LLC,	NOTICE OF CHARGES SEEKING REVOCATION
Respondent.))

Take Notice that under the authority of the Director, as set forth in Alcoholic Beverage Control Act, N.J.S.A. 33:1-1, et seq.; and the regulations promulgated pursuant thereto, the New Jersey Division of Alcoholic Beverage Control ("Division") will seek to revoke plenary retail license 0806-32-005-003 held by Zagami LLC, t/a Landmark Americana Landmark Liquors, issued by Mayor and Council of Glassboro Borough, Gloucester County, for premises located at 1 E Mullica Hill Rd, Glassboro, NJ 08028, for violation of the aforementioned statute and/or regulations. The Division hereby prefers the following charges and will seek the noted penalty to wit:

CHARGE

PRESUMPTIVE PENALTY

1. On 11/28/19, you sold, served or delivered or allowed, permitted or suffered the sale, service or delivery of an alcoholic beverage, directly or indirectly, to a person actually or apparently intoxicated or allowed, permitted or suffered the consumption of an alcoholic beverage by such person on your licensed premises, viz., Maxime C. Pilet; in violation of N.J.A.C. 13:2-23.1(b).

45-day suspension

However due to the aggravating circumstances in this case, the Division will seek revocation of the license based upon the total circumstances.

The licensee must enter a plea to the charges within 30 days of its receipt. Failure to do so will result, pursuant to N.J.A.C. 13:2-19.3(c), in the entry of a non-vult plea on your behalf and the Director upon certification by the Division may impose the penalty stated in this Notice of Charges without further notice.

GURBIR S. GREWAL ATTORNEY GENERAL OF NEW JERSEY

Andrew R. Sapolnick
DEPUTY ATTORNEY GENERAL

LIC. NO.: 0806-32-005-003 AGENCY NO.: S-19-39050, H-2019-51351; DIVISION OF ALCOHOLIC BEVERAGE CONTROL, Petitioner, v. **PLEA** Zagami LLC, Respondent. TO: Andrew R. Sapolnick DEPUTY ATTORNEY GENERAL **ENFORCEMENT BUREAU** CIRCLE THE APPROPRIATE TERM CONTAINED IN THE PARENTHESES "()" I am the (owner) (partner) (member) (president/vice-president) (attorney) of this license duly authorized to enter the decision(s) in this matter as checked below: Please send me a copy of the Report of Investigation issued in this matter. I request you to extend my time to enter a plea by 14 days. Therefore, I enclose a money order or check in the amount of \$50.00 to cover the cost of the report. (For cases in which license suspension is sought and suspension is accepted by licensee): I am pleading non-vult to all of the charges listed in the Notice of Charges and accept the suspension of the subject license to be imposed thereon. I understand that by doing so I will not formally contest the charges and that they will be administratively concluded without a hearing. I am giving up my rights to a hearing and/or to repossess or have returned any cash, evidence, alcoholic beverages, or other property seized in connection with these proceedings. I request that the Director reduce the proposed suspension by 20% in consideration of my plea. I request that the Division consider the following mitigation prior to determining the ultimate penalty. (You may write on the back of this page or use additional separate pages, if necessary.) (For cases in which license suspension is sought and licensee requests to make a monetary compromise in lieu of suspension): I am pleading non-vult to all of the charges listed in the Notice of Charges.

	be administratively concluded without a hearing. I am giving up my rights to a hearing and/or to repossess or have returned any cash, evidence, alcoholic beverages, or other property seized in connection with these proceedings. I request that the Director reduce the proposed penalty by 20% in consideration of my plea. Additionally, I petition the Director, pursuant to N.J.A.C.13:2-19.12, to accept a monetary compromise offer in lieu of suspension. I am enclosing the licensee's Federal Tax Return for the most recent year and/or a letter from the license's accountant showing the total sales of alcohol and the total costs of alcohol in the most recent year. I request the opportunity to offer a monetary penalty in lieu of having my license suspended. I understand that if the Director grants my request, the Division will compute the penalty amount which must be offered and provide me with a petition to sign and return for the Director's consideration. I request that the Division consider the following mitigation prior to determining the ultimate penalty. (You may write on the back of this page or use additional separate pages, if necessary.)
4.	(For cases in which license revocation is sought): I am pleading <u>non-vult</u> to all the
	charges listed in the Notice of Charges. I request the opportunity to divest the license in lieu of revocation. Therefore, I am requesting that the Division contact me to schedule a conference to discuss the options for settlement. In the event that no settlement is reached, I understand that I must surrender my license to the issuing authority.
5.	I wish to plead not guilty to all of the charges listed in the Notice of Charges and request that this matter be forwarded for a hearing.
	a. I am requesting a hearing.
	b. I am requesting a meeting to discuss settlement. If no settlement is reached, I request the matter be forwarded for a hearing.
LICENS	SEE'S SIGNATURE TYPED OR PRINTED NAME

I understand that by doing so I will not formally contest the charges and that they will

DATED:



State of New Jersey

PHILIP D. MURPHY Governor

SHEILA OLIVER Lt. Governor

OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF ALCOHOLIC BEVERAGE CONTROL
P.O. BOX 087

TRENTON, NJ 08625-0087
Phone: (609) 984-2830 Fax: (609) 633-6078
HTTP://WWW.NJ.GOV/LPS/ABC

GURBIR S. GREWAL Attorney General

JAMES B. GRAZIANO Acting Director

JUL 2 8 2020

Zagami LLC t/a Landmark Americana Landmark Liquors 1 E Mullica Hill Rd Glassboro, NJ 08028 LICENSE NO.: 0806-32-005-003 AGENCY DKT. NO.: S-19-38916, H-2019-51143; ISSUED BY: Mayor and Council of Glassboro Borough, Gloucester County

Attached hereto is a copy of the Notice of Charges wherein the Division of Alcoholic Beverage Control ("Division") has alleged that the holder of this license has committed the violations set forth therein and is seeking to revoke your license. Upon receipt of this letter you must enter either a guilty, non-vult or not guilty plea to these charges within 30 days. Failure to enter a plea within the 30-day period shall be deemed to be a statement that you do not contest the charges, which are the subject of this matter. Consequently, if a plea is not entered within the 30-day period, a non-vult plea will be entered on your behalf unless the plea period has been extended by the Division. The Director upon certification from the Division may suspend or revoke your license without further opportunity for you to oppose the charges.

Before entering a plea you may request a copy of the Report of Investigation on which the charges were based and request an additional 14 days to examine the report before you enter a plea. As set forth on the "plea" page, the cost for the report is \$50.00. To receive such reports send a money order or check made payable to the New Jersey Division of Alcoholic Beverage Control. Send your request to Deputy Attorney General, Andrew R. Sapolnick and include the license number and "S" number on all letters and forms of payment.

You are entitled to have an attorney advise you. However, consultation with an attorney will not toll or stop the time of the 30 days for you to enter your plea.

Please be advised if there is a determination of guilt to the charges, the Enforcement Bureau pursuant to N.J.S.A. 33:1-31 will seek revocation and will also seek the forfeiture and disposal of any cash, evidence, alcoholic beverages (or other <u>prima facie</u> contraband nature) seized in connection with these charges.



If you enter a plea of guilty or <u>non-vult</u> (not contesting the charges) you have informed the Division that you do not dispute the charges in this matter and will accept the penalty as set forth. You do have the right to submit in writing mitigating circumstances and requesting the charges be reduced in penalty. In cases in which ABC seeks suspension, the Director may also consider reduction of the penalty by 20% in consideration of your guilty or <u>non-vult</u> plea. In cases in which ABC seeks revocation, the Director may accept a monetary offer and/or suspension in lieu of revocation.

In addition, you have the right to make application to the Director that he accept a monetary compromise offer in lieu of the days suspended pursuant to N.J.A.C. 13:2-19.12.

If you plead not guilty, this case will be sent to the Office of Administrative Law or be retained to be heard before the Director. You or your attorney will receive the necessary notice that the case has been forwarded and the time and place of the hearing.

To assist you in responding to the Division, you may use the "plea" page to advise us of your decision in this matter. If you do utilize this form, after you fill it out we suggest you make a copy and keep it for your records. Please send this reply to DAG Andrew R. Sapolnick.

Very truly yours,

GURBIR S. GREWAL

ATTORNEY GENERAL OF NEW JERSEY

By:

Andrew R. Sapolnick

DEPUTY ATTORNEY GENERAL

Attachment



	LIC. NO.: 0806-32-005-003 AGENCY NO.: S-19-38916, H-2019-51143;
DIVISION OF ALCOHOLIC BEVERAGE CONTROL,	
Petitioner,)
v.	
Zagami LLC,	NOTICE OF CHARGES SEEKING REVOCATION
Respondent.	

Take Notice that under the authority of the Director, as set forth in Alcoholic Beverage Control Act, N.J.S.A. 33:1-1, et seq.; and the regulations promulgated pursuant thereto, the New Jersey Division of Alcoholic Beverage Control ("Division") will seek to revoke plenary retail license 0806-32-005-003 held by Zagami LLC, t/a Landmark Americana Landmark Liquors, issued by Mayor and Council of Glassboro Borough, Gloucester County, for premises located at 1 E Mullica Hill Rd, Glassboro, NJ 08028, for violation of the aforementioned statute and/or regulations. The Division hereby prefers the following charges and will seek the noted penalty to wit:

CHARGE

PRESUMPTIVE PENALTY

1. On 10/10/19, you sold, served or delivered or allowed, permitted or suffered the sale, service or delivery of an alcoholic beverage, directly or indirectly, to a person actually or apparently intoxicated or allowed, permitted or suffered the consumption of an alcoholic beverage by such person on your licensed premises, viz., Robert M. Gallagher; in violation of N.J.A.C. 13:2-23.1(b).

30-day suspension

However due to the aggravating circumstances in this case, the Division will seek revocation of the license based upon the total circumstances.

The licensee must enter a plea to the charges within 30 days of its receipt. Failure to do so will result, pursuant to N.J.A.C. 13:2-19.3(c), in the entry of a non-vult plea on your behalf and the Director upon certification by the Division may impose the penalty stated in this Notice of Charges without further notice.

GURBIR S. GREWAL ATTORNEY GENERAL OF NEW JERSEY

Andrew R. Sapolnick
DEPUTY ATTORNEY GENERAL

LIC. NO.: 0806-32-005-003 AGENCY NO.: S-19-38916, H-2019-51143; DIVISION OF ALCOHOLIC BEVERAGE CONTROL, Petitioner, v. **PLEA** Zagami LLC, Respondent. TO: Andrew R. Sapolnick DEPUTY ATTORNEY GENERAL **ENFORCEMENT BUREAU** CIRCLE THE APPROPRIATE TERM CONTAINED IN THE PARENTHESES "()" I am the (owner) (partner) (member) (president/vice-president) (attorney) of this license duly authorized to enter the decision(s) in this matter as checked below: Please send me a copy of the Report of Investigation issued in this matter. I request you to extend my time to enter a plea by 14 days. Therefore, I enclose a money order or check in the amount of \$50.00 to cover the cost of the report. (For cases in which license suspension is sought and suspension is accepted by licensee): I am pleading non-vult to all of the charges listed in the Notice of Charges and accept the suspension of the subject license to be imposed thereon. I understand that by doing so I will not formally contest the charges and that they will be administratively concluded without a hearing. I am giving up my rights to a hearing and/or to repossess or have returned any cash, evidence, alcoholic beverages, or other property seized in connection with these proceedings. I request that the Director reduce the proposed suspension by 20% in consideration of my plea. I request that the Division consider the following mitigation prior to determining the ultimate penalty. (You may write on the back of this page or use additional separate pages, if necessary.) (For cases in which license suspension is sought and licensee requests to make a monetary compromise in lieu of suspension): I am pleading non-vult to all of the charges listed in the Notice of Charges.

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I understand that by doing so I will not formally contest the charges and that they will

DATED: