

Notice of Violation

(3AAC 304.525)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 2/3/22

License #/Type: 1240 Beverage Dispensary

Licensee: Willow Trading Post Inc.

Address: 14345 N. Willow Station Road, Willow, AK

DBA: Willow Trading Post Lodge

AMCO Case #: 22-0033

This is a notice to you as licensee that an alleged violation has occurred. If the Alcoholic Beverage Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

Investigation revealed that as early as 8-11-20, your business was being advertised "For Sale". Investigator Hamilton had an informal telephone conversations with Crystal Vicente and her husband Kaleo on or about August 2021 about whether they still owned the premises or had it been sold to Russell and Ashely Trent. Both replied that they did sell. On 11-14-21 the Alaska Landmine printed an article in their paper about the Trent's buying the establishment. On 1-10-22, C. Vicente was asked again about whether they sold the property to which C. Vicente indicated Mat-Su property records indicate they still own the property to which records did indicate that. A check of DCCED license and corporation search indicated that the Trent's had registered Willow Trading Post Grill, LLC, on 11-3-20. On 1-31-22, Inv. Hamilton spoke with Mr. Trent who stated he had entered a partnership with the licensee. Mr. Trent provided a "Lease Agreement" to Inv. Hamilton which outlined that he was leasing the property from the licensee since 11-5-20. The lease also stated the licensee was to receive 30% from the profits of the business in addition to the monthly rent. You have also failed to respond to the Director's request for records.

Your attention is directed to AS04.11.450: Prohibited financial interest, 3AAC 304.980: Prohibited financial interest; representative or owner; management agreements, AS04.21.030: Responsibility of licensee, agents and employees, AS04.16.150: Licensee responsible for violations, 3AAC 305.515: Inspection, and 3AAC 304.525: Communications

You are directed to respond in writing to this Notice of Violation within 10 days of receipt to explain what action you have taken to prevent a re-occurrence of this violation. FAILURE TO RESPOND TO THIS NOTICE OF VIOLATION WITHIN 10 DAYS WILL RESULT IN YOUR APPEARANCE, EITHER IN PERSON OR TELEPHONICALLY, BEFORE THE ABC BOARD AT THEIR NEXT REGULARLY SCHEDULED BOARD MEETING.

*Please send your response to the address below and include your alcohol license number in your response.

3 AAC 304.525 (B) provides that upon receipt of a Notice of Violation, a licensee may request to appear before the Director and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice and the Director must grant an appearance within ten days after receipt of a request. A Licensee shall respond, either orally or in writing, to the Notice.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: J. Hamilton

Received by:

SIGNATURE: *J.P. Hamilton*

SIGNATURE: *AMCO*

Delivered VIA: Mail

Date: *DEC 30 2022*

THE LAW OFFICES OF ERNOUF & COFFEY

A PROFESSIONAL CORPORATION
P.O. Box 212314
Anchorage, Alaska 99521
(907) 274-3385

February 2, 2022

Mr. Glen Klinkhart
Director
Alcohol Marijuana Control Office
550 West 7th Avenue, Suite 1600
Anchorage, Alaska 99501
VIA EMAIL

**Re: Willow Trading Post, Inc.
d/b/a Willow Trading Post Lodge
Response to Notice of Violation
#22-0033**

Dear Glen:

Please let this letter serve as a formal response to the aforementioned Notice of Violation.

It appears that my client was under the impression that they had a valid Restaurant Designation Permit that had requested the ability to hire employees under the age of 21 consistent with the requirements of Title 4. The actual reality is that an old RDP existed, but it did not include permission for the employment of minors.

In August of 2021, this office completed a transfer of ownership for the Willow Trading Post, Inc. In this transfer, my client was granted an RDP including the request to hire minors. Unfortunately, during the period of time of the employment of the minors mentioned in this case, there was an RDP but no approval for the hiring of minors.

My client takes these matters very seriously and has directed my office to make sure that the RDP on file is accurate and appropriate for employment of minors. My client has fully cooperated in the investigation and had provided all of the information requested by Investigator Hamilton. My client welcomes the opportunity to come to

Speak with you about this oversight at any time. Having spoken with them now about this at length, I think it is safe to say that this will never happen again.

Please let me know if you would like to meet with them or talk further about these matters. Thank you for your time and consideration in this regard.

Sincerely,

By: s/ W. Sherman Ernouf

cc: Client

Notice of Violation

(3AAC 304.525)

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Date: 1/21/22

License #/Type: 1240 Beverage Dispensary

Licensee: Willow Trading Post Inc.

Address: 14345 N. Willow Station Rd., Willow, AK

DBA: Willow Trading Post Lodge

AMCO Case #: 22-0033

This is a notice to you as licensee that an alleged violation has occurred. If the Alcoholic Beverage Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

On 1-10-22, AMCO learned that your establishment had employed two under 21 year old persons from 1-1-21 to 7-29-21. During those dates mentioned, your AMCO records indicate that you did have a restaurant designation permit signed by past Director Shirley Gifford on 5-13-09. However, only box 1 and 3 were checked. This recognized you as a bona-fide restaurant and allowed anyone 15 and under to enter and eat with anyone over 21 years old, which parental permission. N.K.W., 17 years old, was employed on 1-1-21 to 5-23-21. During that time frame, time sheets indicate 59 violations of under 21 person on a licensed premises. Gwendolyn Desonia, 18 years old, was employed from 5-5-21 to 7-29-21. Time sheets indicate 55 violations of an under 21 person on a licensed premises. A total of 114 violations.

Your attention is directed to AS04.16.052(2): Furnishing of alcoholic beverage to persons under the age of 21 by licensees, AS04.16.049(c) & (d): Access of persons under the age of 21 to licensed premises, 3AAC 304.715 to 3AAC 304.795: Restaurant designation permit, AS04.21.030: Responsibility of licensees, agents and employees and AS04.16.150: Licensee responsible for violations

You are directed to respond in writing to this Notice of Violation within 10 days of receipt to explain what action you have taken to prevent a re-occurrence of this violation. FAILURE TO RESPOND TO THIS NOTICE OF VIOLATION WITHIN 10 DAYS WILL RESULT IN YOUR APPEARANCE, EITHER IN PERSON OR TELEPHONICALLY, BEFORE THE ABC BOARD AT THEIR NEXT REGULARLY SCHEDULED BOARD MEETING.

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Alcohol & Marijuana Control Office

ATTN: Enforcement

550 W. 7th Ave, Suite 1600

Anchorage, Alaska 99501

amco.enforcement@alaska.gov

Issuing Investigator: J. Hamilton

Received by:

SIGNATURE: *J.P. Hamilton*

SIGNATURE:

Delivered VIA: Mail

Date:

AMCO
DEC 30 2022

THE LAW OFFICES OF ERNOUF & COFFEY

A PROFESSIONAL CORPORATION

P.O. Box 212314

Anchorage, Alaska 99521

(907) 274-3385

February 14, 2022

Mr. Glen Klinkhart
Director
Alcohol Marijuana Control Office
550 West 7th Avenue, Suite 1600
Anchorage, Alaska 99501
VIA EMAIL

**Re: Willow Trading Post, Inc.
~~d/b/a Willow Trading Post Lodge~~
Response to Second Notice of
Violation #22-0033**

Dear Glen:

Please let this letter serve as a formal response to the second Notice of Violation in this case.

My client did have the business up for sale in late 2020. However, there was never a sale. Both of my clients do not ever recall stating to Investigator Hamilton that they sold the business. My clients remember meeting with Mr. Hamilton at Peggy's in Anchorage on or around the beginning of September 2021. My client's both recall a discussion about the RDP for Willow Trading Post, Inc. and believe this is when Investigator Hamilton dropped of the license for Willow Trading Post as a transfer had just been completed. Both of my clients are adamant that they did not state that they had sold the business.

When my clients initially met the Trent's, they indicated that they wanted to eventually buy the property and liquor license, but would not have the money until Mr. Trent's investments had matured. The parties agreed to enter into two land leases comprised of multiple parcels of property. One of the leases did include the land upon which the licensed premises is located. However, the parties had agreed that the bar was specifically not included in the lease. Most unfortunately, legal counsel was never consulted and the agreement was written up improperly and failed to include this important term.

Evidently, Mr. Trent formed Willow Trading Post Grill, LLC in anticipation of the future purchase of my client's business and liquor license, which has never occurred. Further, my clients never gave this entity any legal authority to do anything on the property. As far as my client knows, this entity was set up by the Trent's and was never used to do anything.

The parties contemplated many business ideas on the properties to include a marijuana dispensary and had agreed that any business they started would be run by the partnership. The Trent's paid into this partnership concept, but no businesses have been started to date. The partnership idea was centered on the premise that the Trent's would get all but 30% of any revenue of any business that the group started. There was never any agreement on the profits from the liquor license because my client did not lease or sell the license or in any way agree that the Trent's would receive the profits from the sale of alcohol or food for that matter.

The newspaper article published by the Alaska Landmine on November 14, 2021 was a complete and total shock to my client. My client contacted the Trent's immediately and was told by Mr. Trent that the reporter had misrepresented his statements. At that time, my client reiterated strongly to Mr. Trent that he did not own the business and that he and his wife should refrain from stating so until a proper sale could be effectuated.

My clients have just finished pulling together all of the bank records in response to Investigator Hamilton's email request of late last week. These records will substantiate the statements I have made above. I will be sending these records to you under separate cover with answers to his additional questions in the next few days.

Thank you for your time and consideration in this regard.

Sincerely,

By: s/ W. Sherman Ernouf

cc: Investigator Hamilton
Client

AMCO
DEC 30 2022

STATE OF ALASKA - ALCOHOLIC BEVERAGE CONTROL BOARD

LICENSE NUMBER

FORM CONTROL

XXXX

ISSUED

7/24/2023

ABC BOARD

LIQUOR LICENSE

2023 - 2024

TEMPORARY

1240

LICENSE RENEWAL APPLICATION DUE
DECEMBER 31, 2024 (AS 04.11.270(b))

THIS LICENSE EXPIRES MIDNIGHT
FEBRUARY 28, 2025 UNLESS DATED BELOW

TYPE OF LICENSE: Beverage Dispenser

LICENSE FEE: \$2,500.00

1104

CITY / BOROUGH: Outside City Limits
Matanuska-Susitna Borough

D/B/A: Willow Trading Post Lodge
14345 N Willow Station Road

Mail Address:
Willow Trading Post Inc.
1675 E. 5th Ave.
Anchorage, AK 99501

This license cannot be transferred without permission
of the Alcoholic Beverage Control Board

[] Special restriction - see reverse side

ISSUED BY ORDER OF THE
ALCOHOLIC BEVERAGE CONTROL BOARD

Joan M. Wilson
DIRECTOR

04-900 (REV 10/20/22)

THIS LICENSE MUST BE POSTED IN A VISIBLE PLACE ON THE PREMISES

STATE OF ALASKA - ALCOHOLIC BEVERAGE CONTROL BOARD

LICENSE NUMBER

FORM CONTROL

XXXX

ISSUED

7/24/2023

ABC BOARD

LIQUOR LICENSE

2023 - 2024

TEMPORARY

1240

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Matanuska-Susitna Borough

This license cannot be transferred without permission
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[] Special restriction - see reverse side

ISSUED BY ORDER OF THE
ALCOHOLIC BEVERAGE CONTROL BOARD

COPY

DIRECTOR

D/B/A: Willow Trading Post Lodge
14345 N Willow Station Road

Mailing Address:
Willow Trading Post Inc.
1675 E. 5th Ave.
Anchorage, AK 99501

THIS LICENSE MUST BE POSTED IN A VISIBLE PLACE ON THE PREMISES

04-900 (REV 5/9/22)



Alaska Alcoholic Beverage Control Board

Form AB-17: 2023/2024 General Renewal Application

- This form and any required supplemental forms must be completed, signed by the licensee, and postmarked no later than 12/31/2022 per AS 04.11.270, 3 AAC 304.160, with all required fees paid in full, or a non-refundable \$500.00 late fee applies.
Any application for renewal or any fees for renewal that have not been postmarked by 2/28/2023 will be expired per AS 04.11.540, 3 AAC 304.160(e).
All fields of this application must be deemed complete by AMCO staff and must be accompanied by the required fees and all documents required, or the application will be returned without being processed, per AS 04.11.270, 3 AAC 304.105
Receipt and/or processing of renewal payments by AMCO staff neither indicates nor guarantees in any way that an application will be deemed complete, renewed, or that it will be scheduled for the next ABC Board meeting.

Section 1 - Establishment Contact Information

Table with 2 columns: Field Name and Value. Fields include Licensee (Owner), License Type, Doing Business As, Local Governing Body, and Community Council.

If your mailing address has changed, write the NEW address below:

Table for Mailing Address with fields for City, State, and ZIP.

Section 2 - Licensee Contact Information

Contact Licensee: The individual listed below must be part of the ownership structure of the licensee listed in Section 1. This person will be the designated point of contact regarding this license, unless the Optional contact is completed.

Table for Contact Licensee with handwritten entries for name and phone number.

Optional: If you wish for AMCO staff to communicate with anyone other than the Contact Licensee (such as legal counsel) about your license, list their information below:

Table for Optional Contact with fields for Name of Contact and Contact Phone.

Section 3 - for Package Stores ONLY: Written Order Information

Do you intend to sell alcoholic beverages and ship them to another location in response to written solicitation in calendar years 2022 and/or 2023?

Form with YES and NO checkboxes.



Form AB-17: 2023/2024 License Renewal Application

Section 4 – Ownership Structure Certification

YES NO

Did the ownership structure of the licensed business change in 2021/2022?

If Yes, and you have NOT notified AMCO, list the updated information on form AB-39: Change of Officers and submit with your renewal application.

If No, certify the statement below by initialing the box to the right of the statement.

I certify that the ownership structure of the business who owns this alcohol license did not change in any way during the calendar years 2021 or 2022.

Section 5 – License Operation

Check ONE BOX for EACH CALENDAR YEAR that best describes how this liquor license was operated:

	2021	2022
1. The license was operated for more than 240 hours throughout each year. (Year-round)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. The license was only operated during a specified time each year. (Not to exceed 6 months per year) <i>If your operation dates have changed, list them below:</i> _____ to _____	<input type="checkbox"/>	<input type="checkbox"/>
3. The license was only operated to meet the minimum requirement of 240 total hours each calendar year. <i>A complete AB-30: Proof of Minimum Operation Checklist, and all documentation must be provided with this form.</i>	<input type="checkbox"/>	<input type="checkbox"/>
4. The license was not operated at all or was not operated for at least the minimum requirement of 240 total hours each year, during one or both calendar years. <i>A complete Form AB-29: Waiver of Operation Application and corresponding fees must be submitted with this application for each calendar year during which the license was not operated.</i> <u>If you have not met the minimum number of hours of operation in 2021, you are not required to pay the fees, however a complete AB-29 is required with Section 2 marked "Other" and COVID is listed as the reason.</u>	<input type="checkbox"/>	<input type="checkbox"/>

Section 6 - Violations and Convictions

YES NO

Have ANY Notices of Violation been issued for this license?

Has ANY person or entity in this application been convicted of a violation of Title 04, 3AAC 304 or a local ordinance adopted under AS 04.21.010 in 2021 or 2022?

If you checked YES, you MUST attach a list of all Notices of Violation and/or Convictions per AS 04.11.270(a)(2)

If you are unsure if you have received any Notices of Violation, contact the office before submitting this form.

Section 7 – Certifications

As an applicant for a liquor license renewal, I declare under penalty of perjury that I have read and am familiar with AS 04 and 3 AAC 304, and that this application, including all accompanying schedules and statements, are true, correct, and complete.

- I agree to provide all information required by the Alcoholic Beverage Control Board or requested by AMCO staff in support of this application and understand that failure to do so by any deadline given to me by AMCO staff will result in this application being returned and the license being potentially expired if I do not comply with statutory or regulatory requirements.
- I certify that in accordance with AS 04.11.450, no one other than the licensee(s), as defined in AS 04.11.260, has a direct or indirect financial interest in the licensed business.
- I certify that this entity is in good standing with Corporations, Business and Professional Licensing (CBPL) and that all entity officials and stakeholders are current and I have provided AMCO with all required changes of the ownership structure of the business license, and have provided all required documents for any new or changes of officers.

AMCO



Alaska Alcoholic Beverage Control Board

Form AB-17: 2023/2024 License Renewal Application

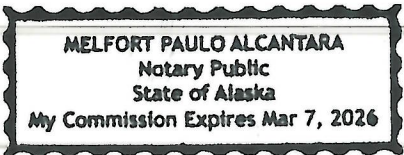
- I certify that all licensees, agents, and employees who sell or serve alcoholic beverages or check identification of patrons have completed an alcohol server education course approved by the ABC Board and keep current, valid copies of their course completion cards on the licensed premises during all working hours, if applicable for this license type as set forth in AS 04.21.025 and 3 AAC 304.465.

I hereby certify that I am the person herein named and subscribing to this application and that I have read the complete application, and I know the full content thereof. I declare that all of the information contained herein, and evidence or other documents submitted are true and correct. I understand that any falsification or misrepresentation of any item or response in this application, or any attachment, or documents to support this application, is sufficient grounds for denying or revoking a license/permit. I further understand that it is a Class A misdemeanor under Alaska Statute 11.56.210 to falsify an application and commit the crime of unsworn falsification.

Signature of licensee: Crystal A Vicente
Printed name of licensee: Crystal A Vicente

Signature of Notary Public: Melfort A.
Notary Public in and for the State of Alaska

My commission expires: March 7, 2026



Subscribed and sworn to before me this 29th day of December, 2022.

- Restaurant and Eating Place applications must include a completed AB-33: Restaurant Receipts Affidavit
Recreational Site applications must include a completed AB-36: Recreational Site Statement
Tourism applications must include a completed AB-37: Tourism Statement
Wholesale applications must include a completed AB-25: Supplier Certification
Common Carrier applications must include a current safety inspection certificate

All renewal and supplemental forms are available online:
https://www.commerce.alaska.gov/web/amco/AlcoholLicenseApplication.aspx

FOR OFFICE USE ONLY

#100521938

Table with 4 columns: License Fee, Application Fee, Misc. Fee, Total Fees Due. Values: \$, \$ 300.00, \$, \$



Department of Commerce, Community, and Economic Development
**CORPORATIONS, BUSINESS & PROFESSIONAL
 LICENSING**

State of Alaska / Commerce / Corporations, Business, and Professional Licensing / Search & Database Download / Corporations / Entity Details

ENTITY DETAILS

Name(s)

Type	Name
Legal Name	Willow Trading Post, Inc.

Entity Type: Business Corporation

Entity #: 94986

Status: Good Standing

AK Formed Date: 7/6/2005

Duration/Expiration: Perpetual

Home State: ALASKA

Next Biennial Report Due: 1/2/2025

Entity Mailing Address: 8140 NORTHVIEW DR, ANCHORAGE, AK 99504

Entity Physical Address: 7025 CAPE LISBURNE LOOP, ANCHORAGE, AK 99504

Registered Agent

Agent Name: JOSHUA HODES

Registered Mailing Address: 701 WEST 8TH AVENUE SUITE 1200, ANCHORAGE, AK 99501

Registered Physical Address: 701 WEST 8TH AVENUE SUITE 1200, ANCHORAGE, AK 99501

Officials

Show Former

AK Entity #	Name	Titles	Owned
	Chin Pi Burley	Shareholder, President, Director	50.00
	CRYSTAL VICENTE	Director, Shareholder, Treasurer, Vice President, Secretary	50.00

Filed Documents

Date Filed	Type	Filing	Certificate
7/06/2005	Creation Filing	Click to View	Click to View
10/18/2010	Biennial Report	Click to View	
10/18/2010	Biennial Report	Click to View	
12/20/2012	Biennial Report	Click to View	
12/20/2012	Agent Change	Click to View	
11/18/2013	Biennial Report	Click to View	
1/23/2015	Biennial Report	Click to View	
12/30/2016	Biennial Report	Click to View	
5/29/2018	Change of Officials	Click to View	
12/28/2018	Biennial Report	Click to View	
12/23/2020	Biennial Report	Click to View	
8/03/2021	Change of Officials	Click to View	
12/06/2022	Biennial Report	Click to View	

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[CONTACT US](#)

Department of Commerce, Community, and Economic Development DCCED RECEIPTING

State of Alaska / Commerce / Intranet / Receipting / Receipt / #100521938

RECEIPT #100521938

Net Total: \$2,850.00

Comment:

Actions

- [Edit Receipt](#)
- [Internal Receipt](#)
- [Customer Receipt](#)
- [Email Receipt](#)

Transaction #1

Account Item(s)		Ref
Type: Credit Card Received: 12/30/2022 Amount: \$2,850.00 Payer Name: Crystal Vicente CC Last 4: 2331 Auth Code: 88180D Created: 1/9/2023 Owner: soalsfcarrell Close Out #: 18860 AG #: 12452		
Type	Amount Applicant	#
ALC - Renewal Application Fee	\$300.00 Willow Trading Post Lodge	1240
ALC - Alcohol License Fees	\$2,500.00 Willow Trading Post Lodge	1240
ALC - Restaurant Designation Fee	\$50.00 Willow Trading Post Lodge	1240

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CONTACT US