



1 P-R-O-C-E-E-D-I-N-G-S

2 11:31 a.m.

3 CHAIRPERSON ANDERSON: And our next  
4 case is a -- it's a contested fact finding  
5 hearing. It's M Street Management Inc., MPIRE  
6 Club. Will the parties please approach and  
7 identify themselves for the record?

8 MR. BLANCHARD: Good morning, Chairman  
9 Anderson. Lyle Blanchard of Greenstein DeLorme  
10 and Luchs representing license holder.

11 CHAIRPERSON ANDERSON: Good morning,  
12 Mr. Blanchard.

13 MR. KUNDANMAL: Good morning. I'm  
14 Adrian Kundanmal. I'm a managing member of --

15 CHAIRPERSON ANDERSON: I'm sorry.  
16 Your last name, sir?

17 MR. KUNDANMAL: Kundanmal, K-U-N-D-A-  
18 N-M-A-L.

19 CHAIRPERSON ANDERSON: Good morning,  
20 Mr. Kundanmal. There's a sign-in sheet. Please  
21 make sure that you sign in. All right.

22 We're here today at the request of  
23 Lyle Blanchard, attorney of record for MPIRE Club  
24 located at 1819 M Street, Northwest. MPIRE Club  
25 desires to challenge the Board's cease and desist

1 order issued on October 23rd, 2019, Board Order  
2 No. 2019-742.

3 Let us review the series of events  
4 that got us to where we are in this matter. All  
5 retailers, Class CT taverns, and CN nightclubs  
6 were required by law to renew their ABC licenses  
7 no later than September 30th, 2019.

8 ABRA notified all licensees scheduled  
9 for renewal regarding this deadline on August  
10 14th, 2019. MPIRE Club, a retail Class C and  
11 nightclub, failed to renew its license by  
12 September 30th, 2019 and thus was operating on an  
13 expired license. On October 23rd, 2019, the ABC  
14 Board issued over 50 cease and desist orders to  
15 those licensees who failed to renew on September  
16 30th, 2019, MPIRE being one of them.

17 On October 23rd, 2019, MPIRE filed a  
18 motion for reconsideration request for a hearing  
19 and stay of the cease and desist order. The  
20 Board granted that motion, Board Order No. 2019-  
21 787, and set this matter for a hearing which  
22 brings us today.

23 Mr. Blanchard, please tell the Board  
24 on what grounds you are challenging the cease and  
25 desist order? Has anything changed since last

1 Wednesday when it was issued? In other words,  
2 has your client renewed his license?

3 MR. BLANCHARD: Thank you, Chairman  
4 Anderson. Before I answer that question, as a  
5 preliminary matter I request that the hearing be  
6 closed to the public pursuant to 23 DCMR 1616.5.  
7 This is a contested case for all intents and  
8 purposes.

9 And I'd also request that the  
10 transcript either be redacted or not posted to  
11 the agency's website based on D.C. Code 2-  
12 534(a)(1) which is the District's Freedom of  
13 Information Act.

14 That exclusion from disclosure under  
15 the Freedom of Information Act is based on  
16 commercial information that if disclosed would  
17 result in a substantial harm to the competitive  
18 position of the person from whom the information  
19 was obtained.

20 And on that note, the Board will note  
21 that one of the exhibits that I included with the  
22 motion, I wrote, confidential, on top of it.  
23 It's a statement of account which is the  
24 financial information that concerns my client's  
25 tax liabilities to date or at least as of last

1 month.

2 Under District law, sales and use tax  
3 information is privileged. It is not allowed to  
4 be disclosed to the public unless you file a  
5 power of attorney form with the Office of Tax and  
6 Revenue that is signed by the taxpayer.

7 And so we'd ask that that exhibit to  
8 the motion be kept confidential and not disclosed  
9 and that any financial information that's  
10 discussed today be kept out of the public record.

11 CHAIRPERSON ANDERSON: All right.  
12 Let's deal with the second one first. You said -  
13 - what was the provision you relied upon?

14 MR. BLANCHARD: It's D.C. Code 2-  
15 534(a)(1). It is the District's Freedom of  
16 Information Act, and there are certain exemptions  
17 from exclusion under Section 534. It's a laundry  
18 list of different things. One of them is trade  
19 secrets and commercial financial information.

20 CHAIRPERSON ANDERSON: Okay. All  
21 right.

22 MR. BLANCHARD: And that's used in  
23 other -- for instance, if I had a client who  
24 withdrew on a government contract and their  
25 financial information is proprietary. For the

1 sense that if it was disclosed to their  
2 competitors, it might take away their advantage.  
3 And similarly here, if my client's tax  
4 liabilities are disclosed, his competitors will  
5 use that in a way that might harm them.

6 CHAIRPERSON ANDERSON: All right. So  
7 for -- I was looking for the provision. But it's  
8 my understanding that you're correct. So I'll  
9 make a motion that that motion be granted. Is  
10 there a second?

11 MEMBER SHORT: Second.

12 MEMBER CROCKETT: Second.

13 CHAIRPERSON ANDERSON: Mr. Short has  
14 seconded the motion and Ms. Crockett. All those  
15 in favor, say aye.

16 (Chorus of aye.)

17 CHAIRPERSON ANDERSON: Those opposed.

18 (No audible response.)

19 CHAIRPERSON ANDERSON: Okay. So that  
20 information will not be disclosed on the  
21 transcript. So we'll make sure that that  
22 remains. So --

23 MR. BLANCHARD: Thank you.

24 CHAIRPERSON ANDERSON: -- the other  
25 provision you had required, you said it's a

1 contested hearing. And what's the provision you  
2 relied upon?

3 MR. BLANCHARD: That's in the Board's  
4 own regulations. One second. 1616.5 says that  
5 all fact finding hearings shall be open to the  
6 public unless closed to the public in accordance  
7 with Section 405 of the Open Meetings Act.

8 CHAIRPERSON ANDERSON: Well, I believe  
9 --

10 MR. BLANCHARD: And just if I could  
11 for a moment --

12 CHAIRPERSON ANDERSON: I don't believe  
13 that's the right provision. I don't believe  
14 that's the right -- I know -- I don't believe  
15 that's the right provision that you're applying.  
16 I know that we have closed meetings when we  
17 discuss personal matters. But I think in this  
18 particular case -- hold on one minute. All  
19 right.

20 MR. BLANCHARD: Just if I could --

21 CHAIRPERSON ANDERSON: Who is in --  
22 well, let's -- I'm not necessarily disagreeing  
23 with you. But that's not the right provision. I  
24 guess so the issue I'm asking, there are one,  
25 two, three -- there are four people in the

1 audience. So there's a young woman who is behind  
2 you. Is that someone who is --

3 MR. BLANCHARD: She's an employee.

4 CHAIRPERSON ANDERSON: She's an  
5 employee of the agency? All right. And I see  
6 there's an investigator which I think that  
7 wouldn't apply because she works for the agency.  
8 And I'm trying to get some clarification on who  
9 else is in the room. I don't know who else is in  
10 the room.

11 MR. BLANCHARD: This gentleman is from  
12 the Office of Tax and Revenue.

13 CHAIRPERSON ANDERSON: I know he's  
14 from Tax and Revenue. So although you're -- I  
15 would not -- I would allow him to remain because  
16 you informed us that one of the reasons why  
17 you're requesting this hearing is because an  
18 issue with someone from the Tax and Revenue. So  
19 I'm not going to tell an official from the Tax  
20 and Revenue that they can't be in the room. So -  
21 -

22 MR. BLANCHARD: And I'm perfectly fine  
23 with that.

24 CHAIRPERSON ANDERSON: Right. So  
25 that's fine. I'm just trying to -- there's

1 another person in the room I'm trying to get  
2 clarification who it is. And I'll get, I guess,  
3 some clarification. But there's really no one  
4 else in the room. So I believe that your motion  
5 is -- all right.

6 So well, your motion is -- I'm going  
7 to deny the motion. The reason I'm going to deny  
8 the motion because there are no members of the  
9 public in this hearing. So it's moot. The only  
10 parties that are actually in the hearing room  
11 today are an employee of your client and an  
12 investigator from our -- two investigators from  
13 our agency and also an employee of the Department  
14 of Finance and Revenue.

15 So I'm going to deny the motion  
16 because it's moot in this particular case. All  
17 right. So -- but anyway, so let's go on from  
18 there then. Where are we?

19 MR. BLANCHARD: Now we can get down to  
20 the heart of the matter.

21 CHAIRPERSON ANDERSON: Yes.

22 MR. BLANCHARD: So in my -- members of  
23 the Board, in my motion that I'm basing our  
24 request for a stay, our request for --

25 CHAIRPERSON ANDERSON: But we granted

1 the stay, so I think what --

2 MR. BLANCHARD: Our request for  
3 reconsideration of the Board's cease and desist -  
4 -

5 CHAIRPERSON ANDERSON: Okay.

6 MR. BLANCHARD: -- is based on my  
7 client's extraordinary efforts to try and reach a  
8 resolution with OTR on its tax liability. As you  
9 know -- as the Board knows, you cannot file a  
10 renewal application unless as a precursor, a  
11 prerequisite you have a certificate of good  
12 standing from the Office of Tax and Revenue.

13 And my client has been working with  
14 the Office of Tax and Revenue for over the past  
15 year to try and get its sales and use taxes  
16 resolved. I got involved about a month ago on  
17 trying to speed up those efforts, and I informed  
18 ABRA staff by phone and email that this issue is  
19 pending.

20 And that's why we hadn't renewed by  
21 the September 30th deadline. That we were trying  
22 to resolve an outstanding tax issues before the  
23 Board took action to issue its cease and desist  
24 order.

25 My -- and hopefully you'll call Mr.

1       Bowie to the stand for his input. But my best  
2       estimate at this moment is that we have filed  
3       some outstanding -- some other returns that were  
4       due that we weren't aware of. So we have filed  
5       those personal property tax returns.

6                 We have one outstanding unincorporated  
7       business franchise tax return for tax year 2018  
8       which was due on April 15th. Our client's  
9       previous accountant filed some extensions which  
10      are allowed. And our client has hired a new  
11      accountant which he can talk about why they did  
12      that.

13                But the new account has stepped up,  
14      filed the personal property, and we're working to  
15      get any outstanding sales tax returns filed. The  
16      business unincorporated franchise tax return  
17      should be filed next week, and that will put us  
18      in a position where we can then enter into a  
19      payment plan and get the certificate of good  
20      standing.

21                My client's staff has -- so I worked  
22      with Mr. Aronin who is the Chief of Collections  
23      at OTR. I sent him about five emails over the  
24      past three weeks to try and get his staff  
25      focused. So there are challenges.

1           Your agency doesn't have very many  
2 challenges. You're fortunate. But the Office of  
3 Tax and Revenue and some other agencies have  
4 staffing capacity challenges and they have  
5 challenges with their software system. Their  
6 software system doesn't always apply a tax  
7 payment properly.

8           And because of that, we've had to get  
9 the numbers scrubbed several times and they're  
10 supposed to be being audited now. I got a  
11 statement at the end of the day yesterday that I  
12 think still has a few errors in it.

13           So we are close to getting the  
14 certificate of good standing. And I believe that  
15 those issues -- unlike some other that I'm not  
16 going to say. I'm not going to name names or say  
17 treat us just as other licensees have been  
18 treated in this situation.

19           But I believe that those issues with  
20 being able to resolve this, and the key issue  
21 here is my client needs to stay open in order for  
22 that cash flow to pay the initial down payment.  
23 The initial down payment, as you saw, I believe,  
24 in the email that I submitted --

25           CHAIRPERSON ANDERSON: I have not seen

1 that information. It might've been submitted to  
2 the agency, but I don't have that.

3 MR. BLANCHARD: So basically, to  
4 recap, my client, only outstanding issue is this  
5 financial one to get a certificate of good  
6 standing. Everything else that needs to do to  
7 renew is ready to go. My client has had no  
8 violations in the entire time it's been  
9 operating.

10 CHAIRPERSON ANDERSON: The unfortunate  
11 thing you're asking the Board to do, Mr.  
12 Blanchard, is to get into the minutia of getting  
13 a good standing certificate. There are certain  
14 requirements that we -- the Board doesn't get  
15 into the minutia of what's going on. All the  
16 Board -- the Board's position is -- the agency's  
17 position, in order renew your license, you need  
18 to comply, provide us this information.

19 We don't -- it's not the concern --  
20 the Board cannot get into the reason why you  
21 cannot provide this information. Whatever the  
22 reason why this information can't be provided,  
23 that is between the licensee and whatever agency.

24 For example, if the licensee -- you  
25 need to do -- give us a police record -- a police

1 report. And if the licensee said for whatever  
2 reason, I can't get the police report, the  
3 regulation says, this is what we need. And so  
4 the Board cannot get into the minutia of why is  
5 it that the person didn't get it.

6 And so I'm not saying I've made a  
7 decision. But I'm not sure how is it that --  
8 you're asking the Board to get into the minutia  
9 of why that your client cannot get a letter of  
10 good standing.

11 I'm not trying to be unsympathetic.  
12 But I believe that if the Board goes down this  
13 road, then every other licensee can come to us  
14 and to say, I can't get a Clean Hands  
15 certificate, I can't get a police report because  
16 of this reason.

17 And the Board doesn't have the  
18 expertise to -- I mean, the Board, we don't --  
19 the regulations say that if you owe more than 100  
20 dollars, then -- and so I don't -- it's not  
21 important to us whether or not it's 101 dollars  
22 or 100,000 dollars. I'm not quite sure how the  
23 Board can get into the intricacies of that  
24 because that's going to open the floodgate for  
25 everyone else.

1 I know that there is a regulation.  
2 And off the top of my head, I don't remember the  
3 regulation where it is clear that if there is a  
4 dispute between the licensee and the government,  
5 say, OTR, and if you have filed a complaint with  
6 the Office of Administrative Hearings and you  
7 provide us proof.

8 Now there is a regulation there that  
9 says that should not prevent you from moving  
10 forward. And this is not this case in the sense  
11 that the licensee has contested whatever the  
12 findings are. And they provided us with a copy  
13 of their filing and they have a hearing. And  
14 that hearing will address the issues.

15 But that's not the situation that  
16 you're providing to us today, right? Is that  
17 correct? I mean, when I say, correct, that --

18 MR. BLANCHARD: It's correct that we  
19 have not filed either with the tax division of  
20 D.C. Superior Court or with the Office of  
21 Administrative Hearings.

22 CHAIRPERSON ANDERSON: Right, because  
23 those are --

24 MR. BLANCHARD: Those are the two  
25 administrative hearing bodies that could hear a

1 tax dispute.

2 CHAIRPERSON ANDERSON: And the law  
3 addresses --

4 MR. BLANCHARD: We have opted --

5 CHAIRPERSON ANDERSON: Right.

6 MR. BLANCHARD: -- work things out  
7 with OTR. So my email to Mr. Aronin that I  
8 included in our motion is a protest. It's titled  
9 protest of this statement of account. And so I'm  
10 asking for the agency to hear our protest rather  
11 than go to a third party appeals board like OAH  
12 or to the court like the tax division. We are  
13 trying to resolve this without going into  
14 litigation because my client's funds are limited.

15 CHAIRPERSON ANDERSON: But you're also  
16 --

17 MR. BLANCHARD: But we have, in fact,  
18 protested within the agency.

19 CHAIRPERSON ANDERSON: But there's no  
20 provision in at least our law that accounts for  
21 that. And so the problem that I'm having  
22 thinking this through is that if the ABC Board  
23 was to decide today to, okay, listen to your case  
24 and give you -- to say to you that, okay, fine,  
25 we'll give you some extra time to settle your

1 matter with OTR.

2           Would it be a day? Would it be a  
3 week? Would it be a month? Would it be a year?  
4 I don't know because then we would have to make a  
5 decision how much -- we would have to make a  
6 decision that we're going to lift the cease and  
7 desist, allow you to operate. And what, for  
8 another month?

9           Because we have allowed you to -- the  
10 establishment to operate a month now since  
11 September 30th. Today is October 29. So we have  
12 now -- we've allowed -- well, we have allowed you  
13 to -- yeah, because we lifted the order. So  
14 we've allowed you to operate a month beyond  
15 September 30th.

16           So when is this going to end? When  
17 are you saying to us, okay, I need another month?  
18 I need another two months or three months, four  
19 months. I don't know.

20           MR. BLANCHARD: Well, let me answer  
21 that question. I believe -- and I've discussed  
22 it with Mr. Bowie just today while we were --  
23 before the hearing. I believe that we can  
24 resolve this.

25           The section that you're referring to

1 is D.C. Code 47-2862, prohibition against  
2 issuance of a license or permit. Subsection B  
3 says if the amount outstanding is over 100  
4 dollars is subject to dispute, the applicant has  
5 properly and timely appealed the infraction,  
6 assessment, tax, or basis for the alleged debt  
7 and the appeal is pending, then the outstanding  
8 debt shall not be cause for the District  
9 government to deny the issuance or reissuance of  
10 a license or permit pursuant to the section.

11 It does not say that an appeal has  
12 been filed with OAH or an appeal has been filed  
13 with the D.C. Superior Court. I contend that we  
14 have appealed to the agency itself before  
15 reconsideration of a statement of account and the  
16 amount owed.

17 I don't want to go into the minutia  
18 either. I don't want to say, okay, here's this  
19 spreadsheet with all the -- I don't want to do  
20 that. And if Mr. Bowie could come up to the  
21 table, I think he could tell you we are close.

22 CHAIRPERSON ANDERSON: I don't  
23 necessarily -- in this particular case, I don't  
24 think it's necessary for Mr. Bowie to come  
25 forward because you're asking us to make a policy

1 decision. So because we'd have to decide whether  
2 or not -- we have to make a decision whether or  
3 not we're going to be involved in the weeds of  
4 this.

5 Rather than just saying -- rather than  
6 accepting the fact that you're unable to give us  
7 the Clean Hands certificate, we, the Board, would  
8 have to make a decision that we're going to make  
9 an exception. And that's basically what it is.  
10 We have to make -- you're asking us to make an  
11 exception to what our rules and regulations  
12 states.

13 MR. BLANCHARD: I would say we're  
14 asking the Board to be flexible in how it applies  
15 to the rules.

16 CHAIRPERSON ANDERSON: Where do we  
17 draw the line, though? We've already given you -  
18 - I'm asking -- we've already given you 30 days  
19 past September 30th. So we've already given you  
20 a month because the cease and desist order did  
21 not go out until 23 days after the deadline had  
22 passed.

23 By operation of law, you requested a  
24 hearing which -- and we granted that. And so the  
25 Board also lifted the provision. And so

1       therefore, we have now given you -- today is the  
2       29th. So we have now given you 29 days. And so  
3       therefore, you have gotten 6 more days than every  
4       other establishment that got this because we sent  
5       out all the cease and desist orders.

6                 Because I know we were here last  
7       Wednesday and we signed off on all the decisions.  
8       But I read them in the record last Wednesday, so  
9       we have now give you an additional six more days.  
10      And so you're asking us to give you another -- at  
11      least another two more weeks.

12                I mean, if you were to say to me,  
13      okay, fine, we'll get a cease and desist order.  
14      We'll have this issued by Friday, then the Board  
15      in its deliberation, you know, you -- because  
16      what I'm going to recommend at the end of this  
17      hearing is that we're going to take it under  
18      advisement.

19                So that's the recommendation I'm going  
20      to make. So I'm not making a decision here. But  
21      if you give us a timeline, I mean, the Board --  
22      and it could legitimately say that we are  
23      deliberating what we're going to do. And so  
24      we're going to issue a decision and then I'll say  
25      that --

1 MR. KUNDANMAL: I'm going to be Lyle's

2 --

3 (Simultaneous speaking.)

4 MR. KUNDANMAL: -- and I'm going to  
5 speak as a client.

6 CHAIRPERSON ANDERSON: Hold on one  
7 minute, sir. I'm an attorney, and I'm saying  
8 this. And I do this for every -- I apply this to  
9 everyone and I know you want something to say.  
10 But he's your attorney. Make sure that you tell  
11 him what you want to speak and he give his  
12 permission. Because I'm an attorney, that's why,  
13 and I do this to everyone. Okay.

14 MR. BLANCHARD: Can we --

15 CHAIRPERSON ANDERSON: Do you want to  
16 -- what do you need? What do you need?

17 MR. BLANCHARD: The Board's  
18 indulgence.

19 CHAIRPERSON ANDERSON: Yes.

20 MR. BLANCHARD: Can we have five  
21 minutes?

22 CHAIRPERSON ANDERSON: I'm fine. And  
23 as I said to you, because I'm an attorney, I  
24 always want to make sure that when someone  
25 speaks, they're speaking through their attorney.

1 And I always do that.

2 MR. KUNDANMAL: Which I prefer.

3 CHAIRPERSON ANDERSON: Okay. So we  
4 can take a five-minute break. Okay. Thanks.  
5 We're off the record for five minutes.

6 (Whereupon, the above-entitled matter  
7 went off the record at 11:57 a.m. and resumed at  
8 12:12 p.m.)

9 CHAIRPERSON ANDERSON: We're back on  
10 the record. So where are we now?

11 MR. BLANCHARD: Chairman Anderson and  
12 members of the Board, we have -- I have conferred  
13 with my client. We've conferred with OTR about  
14 the timing because of the amount of money. And  
15 we also had our client take his account into the  
16 woodshed to get things done.

17 I don't believe we'll be able to get  
18 everything done with OTR, and I don't believe OTR  
19 will be able because it takes -- Mr. Bowie tells  
20 me it takes several levels over Mr. Aronin to  
21 make the decision. But I believe we will be able  
22 to resolve everything with OTR by Tuesday or  
23 Wednesday morning at the latest.

24 CHAIRPERSON ANDERSON: So you're  
25 asking the Board to lift -- that they --

1                   MR. BLANCHARD: I'm asking the Board  
2 to continue the stay until Wednesday, one week  
3 from today.

4                   CHAIRPERSON ANDERSON: I don't know  
5 what -- I don't know. Because you're giving us  
6 something for consideration, I'll call Mr. Bowie  
7 up for him to -- since Mr. Bowie is here. So  
8 I'll -- just for the record so he can explain to  
9 us whether or not that's even a possibility. And  
10 I'm not sure that's going to be.

11                   I'm not saying that the Board will --  
12 that's important to the Board. But since you're  
13 making a representation and OTR is here, I'll  
14 just have -- we'll have some type of record that  
15 whatever decision we made, we considered the  
16 representation that was made. Yes, Mr. Bowie.  
17 Can you state your name for the record, please?

18                   MR. BOWIE: William Bowie, Senior  
19 Counsel with the Office of Tax and Revenue.

20                   CHAIRPERSON ANDERSON: And without  
21 going into the weeds of the licensee's financial  
22 -- or how much they owe or anything like that,  
23 there's -- it's clear that because -- is it  
24 correct that based on their failure to pay more  
25 than 100 dollars in taxes or fees to the District

1 of Columbia that they are unable to receive a  
2 Clean Hands certificate from the city. Is that  
3 correct?

4 MR. BOWIE: That's accurate as of  
5 today.

6 CHAIRPERSON ANDERSON: That's today.  
7 And there's some representation made by Mr.  
8 Blanchard that based on his conversations with  
9 your agency that they believe that if the ABC  
10 Board was to lift this order for another week  
11 that they would be able to receive a Clean Hands  
12 certificate from the agency. Do you have any  
13 representation, if any you can put on the record  
14 today, sir?

15 MR. BOWIE: As I discussed with Mr.  
16 Blanchard, there's certain items that we've  
17 stipulated they needed to take care of before we  
18 would consider whether or not to put them -- to  
19 get their -- put them on a payment agreement. So  
20 they're aware of that, and we're going to resend  
21 them those stipulations at the conclusion of the  
22 hearing.

23 As to whether or not can guarantee  
24 that this would be resolved next Tuesday, as I  
25 told Mr. Blanchard, I cannot guarantee that.

1 That would be the goal. But whether or not that  
2 could be done between now and next Tuesday, I  
3 can't -- we can't guarantee that.

4 CHAIRPERSON ANDERSON: So that would  
5 asking -- today is Wednesday. So the business  
6 would be allowed to be opened for Wednesday,  
7 Thursday, Friday, Saturday, Sunday, Monday, at  
8 least for another seven days. Now Mr. Blanchard,  
9 is this establishment open seven days a week?

10 MR. BLANCHARD: Yes, it is, yes.

11 CHAIRPERSON ANDERSON: So you're  
12 asking us to extend this for another week.

13 MR. BLANCHARD: That is correct.

14 CHAIRPERSON ANDERSON: Any questions  
15 by any of the Board members? Any final  
16 representation you would like to make, sir?

17 MR. BLANCHARD: Just that my client  
18 has 90 employees, and we respectfully request the  
19 Board's deference and flexibility in continuing  
20 the stay for the period requested.

21 CHAIRPERSON ANDERSON: All right.  
22 That's it.

23 MR. BLANCHARD: Thank you.

24 CHAIRPERSON ANDERSON: The Board will  
25 take this matter under advisement. All right.



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This is to certify that the foregoing transcript

In the matter of: MPIRE Club

Before: DCABRA

Date: 10-30-19

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.

*Neal R Gross*

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Court Reporter

**NEAL R. GROSS**

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