

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

**In the Matter of the Accusation Against:**

WOODLEY ENTERPRISES INC

DBA: CLUB 7557

PREMISES: 7557-59 WOODLEY AVE  
VAN NUYS, CA 91406

LICENSE(S): On-Sale General Eating Place

**FILED**

JAN 18 2018

ALCOHOLIC BEVERAGE CONTROL

**File:** 47-419125

**Reg: 18086345**

**ACCUSATION UNDER  
ALCOHOLIC BEVERAGE  
CONTROL ACT AND  
STATE CONSTITUTION**

I hereby complain and accuse the above respondent(s), holding the above license(s), based on the following statement of facts:

**COUNT 1**

By reason of the following facts, there is cause for suspension or revocation of the license(s), in accordance with Section 24200 and Sections 24200(a) and (b) of the Business and Professions Code. It is further alleged that the continuance of the license would be contrary to public welfare and/or morals as set forth in Article XX, Section 22 of the California State Constitution and Sections 24200(a) and (b) of the Business and Professions Code. The facts which constitute the basis for the suspension or revocation by the Department are as follows:

On or about June 22, 2017, respondent-licensee's agent or employee, "Vanessa," encouraged or permitted John Doe #1, on the licensed premises, to touch, caress or fondle her breasts, buttocks, anus, or genitals, in violation of California Code of Regulations, Title 4, Division 1, Section 143.2(3).

**COUNT 2**

By reason of the following facts, there is cause for suspension or revocation of the license(s), in accordance with Section 24200 and Sections 24200(a) and (b) of the Business and Professions Code. It is further alleged that the continuance of the license would be contrary to public welfare and/or morals as set forth in Article XX, Section 22 of the California State Constitution and Sections 24200(a) and (b) of the Business and Professions Code. The facts which constitute the basis for the suspension or revocation by the Department are as follows:

On or about June 22, 2017, respondent-licensee's agent or employee, "Vanessa," encouraged or permitted John Doe #2, on the licensed premises, to touch, caress or fondle her breasts, buttocks, anus, or genitals, in violation of California Code of Regulations, Title 4, Division 1, Section 143.2(3).

**COUNT 3**

By reason of the following facts, there is cause for suspension or revocation of the license(s), in accordance with Section 24200 and Sections 24200(a) and (b) of the Business and Professions Code. It is further alleged that the continuance of the license would be contrary to public welfare and/or morals as set forth in Article XX, Section 22 of the California State Constitution and Sections 24200(a) and (b) of the Business and Professions Code. The facts which constitute the basis for the suspension or revocation by the Department are as follows:

On or about June 22, 2017, respondent-licensees permitted "Anna" to perform or simulate an act of sexual intercourse, masturbation, sodomy, bestiality, oral copulation flagellation or other sexual act upon the premises, prohibited by law, in violation of California Code of Regulations, Title 4, Division 1, Section 143.3(1)(a).

**COUNT 4**

By reason of the following facts, there is cause for suspension or revocation of the license(s), in accordance with Section 24200 and Sections 24200(a) and (b) of the Business and Professions Code. It is further alleged that the continuance of the license would be contrary to public welfare and/or morals as set forth in Article XX, Section 22 of the California State Constitution and Sections 24200(a) and (b) of the Business and Professions Code. The facts which constitute the basis for the suspension or revocation by the Department are as follows:

On or about June 22, 2017, respondent-licensees permitted "Anna" to perform or simulate an act of touching, caressing or fondling her breasts, buttocks, anus or genitals, upon the premises, in violation of California Code of Regulations, Title 4, Division 1, Section 143.3(1)(b).

**COUNT 5**

By reason of the following facts, there is cause for suspension or revocation of the license(s), in accordance with Section 24200 and Sections 24200(a) and (b) of the Business and Professions Code. It is further alleged that the continuance of the license would be contrary to public welfare and/or morals as set forth in Article XX, Section 22 of the California State Constitution and Sections 24200(a) and (b) of the Business and Professions Code. The facts which constitute the basis for the suspension or revocation by the Department are as follows:

On or about June 22, 2017, respondent-licensee's agent or employee, "Lala," encouraged or permitted John Doe #3, on the licensed premises, to touch, caress or fondle her breasts, buttocks, anus, or genitals, in violation of California Code of Regulations, Title 4, Division 1, Section 143.2(3).

For purposes of imposition of penalty, if any arising from this accusation, it is further alleged the respondent- licensee(s) has/have suffered the following disciplinary history:

Viol Date	Violation	Reg. Date	Reg. Number	Penalty
3/18/2016	CCR 143.2(3), 143.3(2), 143.3(1)(A), 143.2(2)	8/26/2015	16084647	Pending.
10/28/2013	CCR 143.3(1)(A), 143.2(3), 143.3(2), 143.3(1)(C), B&P 23402	08/18/2015	15082922	8/19/15 Revocation (stayed for three years until 8/19/18.) 45-day suspension beginning on or after 8/29/15.
8/18/2015	CCR 143.3(1)(A), 143.3(2), 143.3 (1)(B), PC 647(B), B&P 24200 (A&B)	10/28/2013	13079429	10/28/13 30-day suspension (15 days stayed).

Licensee(s) Previous Record: Licensed as above since **December 27, 2004**.

WHEREFORE, I recommend that a hearing be held on this accusation.

Dated this 4<sup>th</sup> day of January 2018.



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Attorney

Department of Alcoholic Beverage Control