

ANTONELLI KANTOR RIVERA PC

354 Eisenhower Parkway,
Suite 1000

Livingston, New Jersey 07039

Tel.: 908-623-3676

Fax: 908-866-0336

Daniel Antonelli — (00684-1997)

Kourtney L. Cooke – (15034-2021)

ABC Prosecutors,

Township of West Orange

LAS PALMERAS, INC. T/A LA DOLCE
VITA, HOLDER OF LICENSE NO.: 0722-
33-045-005, HEARING ON CHARGES OF
ABC VIOTATIONS

TOWNSHIP OF WEST ORANGE
ALCOHOL BEVERAGE CONTROL
BOARD

SETTLEMENT AGREEMENT

THIS SETTLEMENT AGREEMENT is made and entered into this 24th day of June 2025, by and between the Township of West Orange (the “Township”), having its offices at 66 Main Street, West Orange, New Jersey 07502 and represented by the law firm of Antonelli Kantor Rivera PC, Daniel Antonelli, Esq. and Kourtney L. Cooke, Esq. appearing, and Las Palmeras, Inc. t/a La Dolce Vita Bar Restaurante (“Licensee”) holder of Plenary Retail Consumption License No.: 0722-33-045-005, located at 364 Valley Road, West Orange, New Jersey 07052 and represented by Robert C. Williams, Robert C. Williams, Esq. appearing; and

WHEREAS, the Licensee was issued nine (9) Notices of Violation (“NOVs”) for incidents which allegedly occurred on October 4, 2021, October 17, 2021, November 28, 2021, March 6, 2022, May 29, 2022, September 16, 2022, October 16, 2022, November 7, 2022, December 10, 2022, December 16, 2022, January 29, 2023, March 12, 2023, August 7, 2023, October 6, 2023, October 21, 2023, October 25, 2023, November 12, 2023, November 18, 2023, November 26, 2023, November 29, 2023, February 7, 2024, March 14, 2024, April 7, 2024, April 8, 2024,

April 28, 2024, June 3, 2024, June 16, 2024, August 23, 2024, September 15, 2024, September 24, 2024, November 1, 2024, May 24, 2025 and June 2, 2025, respectively; and

WHEREAS, the NOVs and the respective violations charged are set forth in an attachment hereto titled **“Exhibit A”** (collectively, the “Charges”); and

WHEREAS, the Licensee made renovations to the licensed premises, including but not limited to installing soundproof structure panels on the walls and ceiling of the establishment; and

WHEREAS, on June 24, 2025, the Licensee, its owner and operator, Jose G. Zhangallimbay, having had more than sufficient opportunity to consult with the attorney of his choosing, Robert C. Williams, Esq., and having been advised that the Licensee has a right to a hearing on the Charges, determined to and did agree to waive any hearing and voluntarily accepted and consented to the following terms and conditions:

1. License #0722-33-045-005 shall be suspended for 100 days total, as follows:
 - a) Thirty (30) days to be served, which shall begin on Tuesday, July 15, 2025 at 10:00A.M. and continue through until Thursday, August 14, 2025 at 10:00A.M.;
 - b) Twenty (20) days held in abeyance for one (1) year, to be served in the event the Licensee is found guilty of serving an actually or apparently intoxicated person, in violation of N.J.A.C. 13:2-23.1(b);
 - c) Monetary payment to the State, in lieu of fifty (50) day suspension.
2. Security:

- a) All security will provide Security Officer Registration Act (“SORA”) cards within thirty (30) days;
 - b) All security will participate in training programs, suggested by the State Police, with a focus on de-escalation.
3. Any violations of the following offenses, between July 1, 2025 and June 30, 2026, will be charged as a successive violation, consistent with N.J.A.C. 13:2-19.11(f):
- a) Ordinance Violation, N.J.S.A. 33:1-31(h);
 - b) Special Condition Violation, N.J.S.A. 33:1-31(h);
 - c) Brawl, N.J.A.C. 13:2-23.6(a)(2);
 - d) Serving an actually or apparently intoxicated person, N.J.A.C. 13:2-23.1(b);
 - e) Hindering an investigation, N.J.S.A. 33:1-35/N.J.A.C. 13:2-23.30;
 - f) Sale or consumption beyond the scope of the license, N.J.S.A. 33:1-12/N.J.A.C. 13:2-23.1(a); and
 - g) Nuisance, N.J.A.C. 13:2-23.6(b).
4. Should this corrective action not facilitate a change in the Licensee’s violations, future violations after July 1, 2025 will be considered towards non-renewal of the license for future years.
5. The Licensee shall enter a non-vult plea to all pending Charges.
6. The Licensee shall withdraw its Appeal regarding the March 13, 2025 Hearing result, wherein the Licensee was found guilty of violating N.J.A.C. 13:2-23.6(b), and the license was suspended for thirty (30) days.

NOW, THEREFORE, BE IT RESOLVED in consideration of the mutual promises of the parties to this Agreement, the Licensee waives all rights to a hearing or an appeal relative to the aforementioned Charges; and

IN WITNESS WHEREOF, the parties have signed this Agreement and it is effective as of the date first written on page 1 of this Agreement, and subject to the approval by the Township's Alcohol Beverage Control Board.

TOWNSHIP OF WEST ORANGE

By: _____
ABC Prosecutor

LAS PALMERAS, INC. T/A LA DOLCE VITA BAR RESTAURANTE

By: _____
Robert C. Williams, Esq.

Prepared by: Daniel Antonelli, Esq., ABC Prosecutor
Kourtney L. Cooke, Esq., ABC Prosecutor

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EXHIBIT “A”

Las Palmeras, Inc. t/a La Dolce Vita Bar Restaurante

Las Palmeras, Inc. t/a La Dolce Vita Bar Restaurante currently has thirty-three (33) incident dates, with a total of eighty-eight (88) violations, pending resolution.

NOTICE #1

Violation #1: On November 18, 2023, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #2: On November 18, 2023, you failed to comply with the Township of West Orange’s Noise Ordinance No. §4-4, in violation of N.J.S.A. 33:1-31(h); and

Violation #3: On November 18, 2023, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2).

NOTICE #2

Violation #1: On October 25, 2023, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #2: On October 25, 2023, you failed to comply with the Township of West Orange’s Noise Ordinance No. §4-4, in violation of N.J.S.A. 33:1-31(h);

Violation #3: On October 21, 2023, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #4: On October 21, 2023, you failed to comply with the Township of West Orange’s Noise Ordinance No. §4-4, in violation of N.J.S.A. 33:1-31(h);

Violation #5: On October 6, 2023, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #6: On October 6, 2023, you failed to comply with the Township of West Orange’s Noise Ordinance No. §4-4, in violation of N.J.S.A. 33:1-31(h);

Violation #7: On November 29, 2023, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #8: On November 29, 2023, you failed to comply with the Township of West

Orange's Noise Ordinance No. §4-4, in violation of N.J.S.A. 33:1-31(h);

Violation #9: On November 26, 2023, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #10: On November 26, 2023, you failed to comply with the Township of West Orange's Noise Ordinance No. §4-4, in violation of N.J.S.A. 33:1-31(h);

Violation #11: On August 7, 2023, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2);

Violation #12: On August 7, 2023, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #13: On August 7, 2023, you hindered or attempted to hinder an ABC investigation in violation of N.J.S.A. 33:1-35/N.J.A.C. 13:2-23.30;

Violation #14: On August 7, 2023, you failed to comply with special condition to make available the video surveillance footage of the licensed premises to the West Orange PD upon request, in violation of the Township's ABC Board Resolution No.: 718-23, in violation of N.J.S.A. 33:1-31(h);

Violation #15: On August 7, 2023, you sold, served, delivered, or suffered the sale, service, delivery or consumption of alcoholic beverages, directly or indirectly, to an actually or apparently intoxicated person in violation of N.J.A.C. 13:2-23.1(b);

Violation #16: On March 12, 2023, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2);

Violation #17: On March 12, 2023, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #18: On March 12, 2023, you hindered or attempted to hinder an ABC investigation in violation of N.J.S.A. 33:1-35/N.J.A.C. 13:2-23.30;

Violation #19: On March 12, 2023, you failed to comply with special condition to make available the video surveillance footage of the licensed premises to the West Orange PD upon request, in violation of the Township's ABC Board Resolution No.: 718-23, in violation of N.J.S.A. 33:1-31(h);

Violation #20: On January 29, 2023, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2);

Violation #21: On January 29, 2023, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #22: On January 29, 2023, your employee(s) hindered or attempted to hinder an ABC investigation in violation of N.J.S.A. 33:1-35/N.J.A.C. 13:2-23.30 in violation of N.J.A.C. 13:2-23.20;

Violation #23: On January 29, 2023, you failed to comply with special condition to make available the video surveillance footage of the licensed premises to the West Orange PD upon request, in violation of the Township's ABC Board Resolution No.: 718-23, in violation of N.J.S.A. 33:1-31(h);

Violation #24: On January 29, 2023, you sold, served, delivered, or suffered the sale, service, delivery or consumption of alcoholic beverages, directly or indirectly, to an actually or apparently intoxicated person in violation of N.J.A.C. 13:2-23.1(b);

Violation #25: On December 16, 2022, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2);

Violation #26: On December 16, 2022, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #27: On December 16, 2022, you hindered or attempted to hinder an ABC investigation in violation of N.J.S.A. 33:1-35/N.J.A.C. 13:2-23.30;

Violation #28: On December 16, 2022, you failed to comply with special condition to make available the video surveillance footage of the licensed premises to the West Orange PD upon request, in violation of the Township's ABC Board Resolution No.: 718-23, in violation of N.J.S.A. 33:1-31(h);

Violation #29: On December 10, 2022, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2);

Violation #30: On December 10, 2022, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #31: On December 10, 2022, you failed to comply the special condition to hire a licensed security company to provide security for the interior of the Licensed Premises on Friday, Saturday and Sunday nights from 9:30p.m. to 1:30a.m., in violation of the Township's Alcoholic Beverage and Control Board Resolution No.: 598-18, in violation of N.J.S.A. 33:1-31(h);

Violation #32: On November 7, 2022, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2);

Violation #33: On November 7, 2022, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #34: On November 7, 2022, you hindered or attempted to hinder an ABC investigation in violation of N.J.S.A. 33:1-35/N.J.A.C. 13:2-23.30;

Violation #35: On October 17, 2021, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2);

Violation #36: On October 17, 2021, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #37: On October 17, 2021, you sold, served, delivered, or suffered the sale, service, delivery or consumption of alcoholic beverages, directly or indirectly, to an actually or apparently intoxicated person in violation of N.J.A.C. 13:2-23.1(b);

Violation #38: On September 16, 2022, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2);

Violation #39: On September 16, 2022, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #40: On September 16, 2022, you hindered or attempted to hinder an ABC

investigation in violation of N.J.S.A. 33:1-35/N.J.A.C. 13:2-23.30;

Violation #41 On September 16, 2022, you failed to maintain a complete employee list in violation of N.J.A.C. 13:2-23.13(a)(3);

Violation #42: On May 29, 2022, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2);

Violation #43: On May 29, 2022, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #44: On March 6, 2022, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2);

Violation #45: On March 6, 2022, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #46: On November 28, 2021, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2);

Violation #47: On November 28, 2021, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #48: On October 16, 2022, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2);

Violation #49: On October 16, 2022, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #50: On October 16, 2022, you sold, served, delivered, or suffered the sale, service, delivery or consumption of alcoholic beverages, directly or indirectly, to an actually or apparently intoxicated person in violation of N.J.A.C. 13:2-23.1(b);

Violation #51: On October 4, 2021, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2);

Violation #52: On October 4, 2021, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #53: On October 4, 2021, you sold, served, delivered, or suffered the sale, service, delivery or consumption of alcoholic beverages, directly or indirectly, to an actually or apparently intoxicated person in violation of N.J.A.C. 13:2-23.1(b);

Violation #54: On November 12, 2023, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely affecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b); and

Violation #55: On November 12, 2023, you failed to comply with the Township of West Orange's Noise Ordinance No. §4-4, in violation of N.J.S.A. 33:1-31(h).

NOTICE #3

Violation #1: On February 7, 2024, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b); and

Violation #2: On February 7, 2024, you failed to comply with the Township of West Orange's Noise Ordinance No. §4-4, in violation of N.J.S.A. 33:1-31(h).

NOTICE #4

Violation #1: On March 14, 2024, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #2: On March 14, 2024, you failed to comply with the Township of West Orange's Noise Ordinance No. §4-4, in violation of N.J.S.A. 33:1-31(h);

Violation #3: On April 7, 2024, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #4: On April 7, 2024, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2);

Violation #5: On April 8, 2024, you failed to comply with the Township of West Orange's Noise Ordinance No. §4-4, in violation of N.J.S.A. 33:1-31(h); and

Violation #6: On April 28, 2024, you failed to comply with the Township of West Orange's Ordinance No. §4-17.3, in violation of N.J.S.A. 33:1-31(h).

NOTICE #5

Violation #1: On June 3, 2024, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #2: On June 3, 2024, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2);

Violation #3: On June 16, 2024, you sold, served, delivered or allowed, permitted or suffered the sale, service or delivery of alcoholic beverages, directly or indirectly, to a person under the legal age to purchase or consume alcoholic beverages or allowed, permitted, or suffered the consumption of alcoholic beverages by any such person in or upon the licensed premises, in violation of N.J.A.C. 13:2-23.1(a);

Violation #4: On June 16, 2024, you failed to comply with special condition to make available the video surveillance footage of the licensed premises to the West Orange PD upon request, in violation of the Township's ABC Board Resolution No.: 718-23, in violation of N.J.S.A. 33:1-31(h); and

Violation #5: On June 16, 2024, you hindered or attempted to hinder an ABC investigation in violation of N.J.S.A. 33:1-35/N.J.A.C. 13:2-23.30.

NOTICE #6

Violation #1: On August 23, 2024, you sold, served, delivered, or suffered the sale, service, delivery or consumption of alcoholic beverages, directly or indirectly, to an actually or apparently intoxicated person in violation of N.J.A.C. 13:2-23.1(b); and

Violation #2: On August 23, 2024, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of

the public in violation of N.J.A.C. 13:2-23.6(b).

NOTICE #7

Violation #1: On September 15, 2024, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #2: On September 15, 2024, you sold, served, delivered, or suffered the sale, service, delivery or consumption of alcoholic beverages, directly or indirectly, to an actually or apparently intoxicated person in violation of N.J.A.C. 13:2-23.1(b);

Violation #3: On September 15, 2024, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2);

Violation #4: On September 15, 2024, you failed to maintain a complete employee list in violation of N.J.A.C. 13:2-23.13(a)(3);

Violation #5: On September 24, 2024, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b); and

Violation #6: On September 24, 2024, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2).

NOTICE #8

Violation #5: On November 1, 2024, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #6: On November 1, 2024, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2);

Violation #7: On November 1, 2024, you sold, served, delivered, or suffered the sale, service, delivery or consumption of alcoholic beverages, directly or indirectly, to an actually or apparently intoxicated person in violation of N.J.A.C. 13:2-23.1(b); and

Violation #8: On November 1, 2024, you sold, served, delivered, or suffered the sale, service, delivery or consumption of alcoholic beverages, directly or indirectly, to an actually or apparently intoxicated person in violation of N.J.A.C. 13:2-23.1(b).

NOTICE #9

Violation #1: On May 24, 2025, you allowed, permitted or suffered in or upon the licensed premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b);

Violation #2: On May 24, 2025, you allowed, permitted or suffered on or about the licensed premises, a brawl, act or violence and/or disturbance in violation of N.J.A.C. 13:2-23.6(a)(2);

Violation #3: On May 24, 2025, you failed to comply with the Township of West Orange's Noise Ordinance No. §4-4, in violation of N.J.S.A. 33:1-31(h);

Violation #4: On June 2, 2025, you allowed, permitted or suffered in or upon the licensed

premises a nuisance requiring police intervention, or adversely effecting public safety or rights of the public in violation of N.J.A.C. 13:2-23.6(b); and

Violation #5: On June 2, 2025, you sold, served, delivered, or suffered the sale, service, delivery or consumption of alcoholic beverages, directly or indirectly, to an actually or apparently intoxicated person in violation of N.J.A.C. 13:2-23.1(b).