



**STATE OF NORTH DAKOTA
COUNTY OF WARD
BEFORE THE MINOT CITY COUNCIL**

IN THE MATTER OF:

**DUCKPOND VENTURES, LLC
Attn: Jon Lakoduk
LICENSE NO. BL24-0322
105 1st ST SE (Basement)
MINOT, NORTH DAKOTA
58701**

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**AMENDED
COMPLAINT AND
SPECIFICATION OF
ISSUES**

TO: DUCKPOND VENTURES, LLC

This complaint and specification of issues is being served upon you with regard to a City of Minot Retail Liquor, Beer, & Wine License, license number BL24-0322. The purpose of this complaint and specification of issues is to request the suspension or revocation of such license at a subsequent hearing to be held before the Minot City Council at 5:30 pm on Monday, MAY 20TH, 2024. If you fail to respond and appear at the hearing as scheduled above, an order imposing a penalty of suspension or revocation will be issued. The factual circumstances alleged in support of this suspension or revocation action are the following:

1. The City of Minot is a municipal entity as a political subdivision in the state of North Dakota, and pursuant to North Dakota law codified at NDCC 5-02-09, and powers in the City of Minot's Home Rule Charter, the City, as the local governing body, may implement ordinances or resolutions to regulate or restrict the operation of licensees obtaining liquor licenses in said municipality; and
2. That the City of Minot has codified in its code of ordinances certain regulations and restrictions relating to alcoholic beverages. See Minot City Ordinance Chapter 5, Sections 5-1 through 5-44, inclusive; and
3. DUCKPOND VENTURES, located in the basement of 105 1st St. SE in Minot, North Dakota ("Licensee") is a licensed alcohol beverage retailer in the City of Minot, and is the current holder of a 2024 Retail Liquor, Beer, & Wine License No. BL24-0322, issued to Licensee and effective on February 5, 2024; and
4. Following an investigation, the affiant has reason to believe the following events have occurred:
 - a. On October 19, 2023, DUCKPOND VENTURES, LLC operated their premises at a premises other than the licensed premises to which

- their city liquor license relates without obtaining a permit pursuant to Minot City Ordinance Sec. 5-40.
- b. On November 2, 2023, DUCKPOND VENTURES, LLC operated their premises at a premises other than the licensed premises to which their city liquor license relates without obtaining a permit pursuant to Minot City Ordinance Sec. 5-40.
 - c. On November 30, 2023, DUCKPOND VENTURES, LLC operated their premises at a premises other than the licensed premises to which their city liquor license relates without obtaining a permit pursuant to Minot City Ordinance Sec. 5-40.
 - d. On December 14, 2023, DUCKPOND VENTURES, LLC operated their premises at a premises other than the licensed premises to which their city liquor license relates without obtaining a permit pursuant to Minot City Ordinance Sec. 5-40.
 - e. On February 22, 2024, DUCKPOND VENTURES, LLC operated their premises at a premises other than the licensed premises to which their city liquor license relates without obtaining a permit pursuant to Minot City Ordinance Sec. 5-40.
 - f. On March 9, 2024, DUCKPOND VENTURES, LLC operated their premises at a premises other than the licensed premises to which their city liquor license relates without obtaining a permit pursuant to Minot City Ordinance Sec. 5-40.
5. If the City Council determines allegations set forth in paragraph 4 did in fact occur, they would be considered violations of Minot City Ordinance Sec. 5-40, which prohibits a licensee from allowing the sale and consumption of alcoholic beverages off the premises to which their license specifically relates.
6. THEREFORE, the affiant hereby considers this complaint and specifications submitted to the Minot City Council to hold any hearings it deems necessary to make a determination as to what action, if any, it wants to take against the City of Minot retail alcoholic beverage license of Licensee, including such actions as, suspension or revocation of the license pursuant to Minot City Ordinance Sec. 5-32.

Dated this 16 day of May, 2024.



John Klug, Police Chief
City of Minot
PO Box 5006
Minot, North Dakota 58702-5006