

**STATE OF CONNECTICUT
DEPARTMENT OF CONSUMER PROTECTION**

NOTICE AND PARTICULARS

By Email: jerome.jivoain@gmail.com; raider44d@gmail.com; paul@kmlegalct.com

In the matter of:

Jerome T. Jivoain, Jr., Permittee
Four Dad's Pub - Lakeview
50 Lake Street
Coventry, CT 06238

Permit No. LIR.21168
Case No. 2023-408
Backer: 4DP Coventry LLC

PURSUANT TO CONN. GEN. STAT. § 30-43 AS AMENDED:

Pursuant to Chapter 545 generally and specifically Section 30-55 of the Connecticut General Statutes as amended, you and a member of the backer limited liability company are hereby summoned to appear before the Department of Consumer Protection of the State of Connecticut, on the **9th day of November 2023 at 10:00 a.m.**, remotely through Microsoft Teams, then and there to answer to the complaint and charges of said Division, the particulars of which are as follows:

Incident 1. July 21, 2023.

Charge 1. Discretionary suspension, revocation or refusal of permits; disqualification of applicant or permittee. The Department has reasonable cause to believe that a member of the backer is not a suitable person to hold a permit for the sale of alcoholic liquor because as of July 21, 2023, he appears to be financially irresponsible and/or has neglected or is unable to pay his just debts; consequently, the permit should not be granted pursuant to Section 30-47(a)(1) of the Connecticut General Statutes.

As more particularly set forth:

As of July 21, 2023, Dante J. Boffi, member of 4DP Coventry LLC, the proposed backer, has made multiple personal debit card purchases from the 4DP Coventry LLC account at places which do not appear to be related to the proposed permit premises. There have been multiple withdrawal transactions through ATMs and electronic transfers into other business accounts held by Dante Boffi, some in the amount of over \$10,000.00, and, additionally, to personal accounts held by Dante Boffi and other family members. There were also multiple transfers back and forth from 4DP Hartford LLC and 4DP Southwick LLC bank accounts. The 4DP Coventry LLC account took in over \$257,000.00 in deposits including investments from Neil Hartzog, the proposed permittee Jerome Jivoain, and money coming in from other

Four Dads entities yet the 4 DP Coventry LLC bank account was closed in a “charge off” in the amount of \$492.88 on November 8, 2022. Lastly, according to the landlord of 50 Lake Street in Coventry, Mr. Boffi has defaulted on his lease.

Charge 2. Discretionary suspension, revocation or refusal of permits; disqualification of applicant or permittee. The Department has reasonable cause to believe that a member of the backer is a not a suitable person to hold a permit for the sale of alcoholic liquor because as of July 21, 2023, he wilfully made a false statement to the Department in a material matter; consequently, the permit should not be granted pursuant to Section 30-47(a)(4) of the Connecticut General Statutes.

As more particularly set forth:

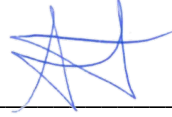
On May 4, 2023, an Application for On-Premises Liquor Permit was submitted to the Department, in which Dante J. Boffi attested that he was the sole owner of the permit premises with 100% of the interests in 4DP Coventry LLC, the proposed backer. An investigation by a liquor control agent revealed that several individuals, including Matt Rusconi, Neil Hartzog, Brian Webster and Peter Taylor all made cash contributions in exchange for a percentage of ownership prior to the date of the application. Mr. Rusconi completed a \$250,000.00 wire transfer on April 18, 2023, in exchange for 45% ownership. Mr. Hartzog contributed a total of \$150,000.00 in payments made in June and August of 2022 in exchange for 17% ownership. Mr. Webster contributed a total of \$50,000.00 in payments made in October and December of 2021 in exchange for ownership in both the Four Dads Coventry and Four Dads Hartford locations. The ownership would be under DMLB LLC consisting of members, Brian Webster, Mary Jakubec, Laura Webster and Dorene Dessert. Mr. Taylor made payments totaling \$15,000.00 in March, May and December of 2022 for 1% in Four Dads Coventry, Four Dads Southwick and Four Dads Hartford locations. Proposed permittee Jeremy T. Jivoin Jr. completed a \$50,000.00 wire transfer on June 3, 2022, in exchange for 20% ownership in the Coventry location.

PLEASE BE ADVISED THAT YOU WILL BE EXPECTED TO APPEAR WHEN YOUR HEARING IS CALLED BY THE COMMISSION. FAILURE TO APPEAR AT THE DESIGNATED TIME MAY RESULT IN A DEFAULT. YOU WILL BE REQUIRED TO SHOW CAUSE, IF THERE BE ANY, WHY YOUR LIQUOR PERMIT SHOULD NOT BE REVOKED OR SUSPENDED OR ANY OTHER AUTHORIZED PENALTY IMPOSED ON YOU.

If you have any questions, please contact Marion Slater of the Department of Consumer Protection’s Legal Division by email Marion.Slater@ct.gov.

Dated this 26th day of September 2023.

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Scott P. Madeo
Staff Attorney
Legal Division