



SEDGWICK COUNTY, KANSAS
OFFICE OF THE COUNTY CLERK

KELLY B. ARNOLD
COUNTY CLERK

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August 14, 2015

J.V. Diamond, Inc.
Attn: Ms. Valerie Washington
2405 E. 21st Street North
Wichita, KS 67214
VIA HAND DELIVERY OR CERTIFIED MAIL

Re: J.V. Diamond, Inc. (d/b/a Jezebels)
Adult Entertainment Establishment License

Dear Ms. Washington:

I have determined, based on credible and reasonably reliable information and evidence, that one or more specific grounds exist for revocation of your adult entertainment establishment license, as provided in Sedgwick County Code Sec. 17-614(b). The grounds for revocation are as follows:

- Within a 12 month period beginning February 1, 2014 until January 31, 2015, one or more adult entertainment employees, as defined by Sedgwick County Code Sec. 17-503, of your establishment, on 3 or more occasions, including but not limited to February 2, 2014, February 20, 2014, March 6, 2014, March 22, 2014, April 17, 2014, May 14, 2014, June 7, 2014, July 10, 2014, July 17, 2014 (3 instances) and November 16, 2014, engaged in activity constituting a public nuisance as described in K.S.A. 22-3901(g), i.e. violations of the law regarding controlled substances, K.S.A. 21-5705, specifically the distribution of cocaine, marijuana and narcotics. *See Sedgwick County Code Sec. 17-614(b)(3).*

- Within a 12 month period beginning February 1, 2014 until January 31, 2015, one or more adult entertainment employees, as defined by Sedgwick County Code Sec. 17-503, of your establishment, on 3 or more occasions, including but not limited to, November 16, 2014, December 8, 2014 (at least 13 instances), January 8, 2015 and January 12, 2015 (at least 7 instances), engaged in activity constituting a public nuisance as described in K.S.A. 22-3901(d), i.e. promoting obscenity by performing or permitting any person to perform on the licensed premises acts of or acts which simulate: sexual intercourse, masturbation, sodomy, any other sexual act which is prohibited by law; touching, caressing or fondling the breasts, buttocks, anus or genitals of persons located on the licensed premises. *See Sedgwick County Code Sec. 17-614(b)(3).*

- On or about February 23, 2015, Chanelle Trotter, a manager licensed to perform managerial duties at Jezebels, was convicted in the Eighteenth Judicial District Court, case 2014CR316, of violation of Sedgwick County Code Sec. 17-607(m) (loud speaker or sound equipment audible off the licensed premises). *See Sedgwick County Code Sec. 17-614(b)(2).*

- On or about January 22, 2015, Cornell Perry, a manager licensed to perform managerial duties at Jezebels, was convicted in the Eighteenth Judicial District Court, case 2014CR359, of violation of the Adult Entertainment Code (Sedgwick County Code Sec. 17-1001(b)) in that he encouraged or permitted an adult entertainer to violate Sedgwick County Code Sec. 17-706(b) (provide/offer to provide adult entertainer services without having a current and valid adult entertainer license). *See Sedgwick County Code Sec. 17-614(b)(2).*

- This establishment is in violation of Sedgwick County Code Sec. 17-506 in that it is being established, operated or maintained unlawfully and as a public nuisance. This establishment (including real and person property) is a common nuisance in that it is being used to maintain and carry on activities prohibited by K.S.A. 22-3901(d) (promoting obscenity) and K.S.A. 22-3901(g) (violation of controlled substance laws). *See Sedgwick County Code Sec. 17-614(b)(12).* From December 2013 through June 2015, investigators and deputies with the Sedgwick County Sheriff's Office observed on the licensed premises the following criminal violations:
 - Unlawful distribution of cocaine in violation of K.S.A. 21-5705 on 9 occasions for which criminal cases have been charged against 6 persons, all of whom were acting as adult establishment employees, as defined by Sedgwick County Code Sec. 17-503.

- Unlawful distribution of narcotics in violation of K.S.A. 21-5705 on 5 occasions for which criminal cases have been charged against 4 persons, all of whom were acting as adult establishment employees, as defined by Sedgwick County Code Sec. 17-503.
 - Unlawful distribution of marijuana in violation of K.S.A. 21-5707 on 3 occasions for which criminal cases have been charged against 2 persons, 1 of whom was acting as an adult establishment employee, as defined by Sedgwick County Code Sec. 17-503.
 - Unlawfully furnishing alcohol to a minor on two occasions in violation of the laws of the State of Kansas pertaining to Family Relationships and Children, specifically K.S.A. 21-5607(a), for which criminal charges have been filed against two persons, both of whom were acting as adult establishment employees, as defined by Sedgwick County Code Sec. 17-503.
 - Unlawful consumption of alcohol by a minor on two occasions in violation of liquor laws of the State of Kansas, specifically K.S.A. 41-727, for which criminal charges have been filed against one person who was acting as an adult establishment employee, as defined by Sedgwick County Code Sec. 17-503.
 - Unlawfully permitting consumption by a minor on the licensed premises in violation of the liquor laws of the State of Kansas, specifically K.S.A. 41-2615, for which criminal charges have been filed against 2 persons, both of whom were acting as adult establishment employees, as defined by Sedgwick County Code Sec. 17-503.
 - Unlawful violation of the laws of Sedgwick County, Kansas, specifically Sedgwick County Code Chapters 17 and 4 for which criminal cases will be charged against at least 29 persons, 24 of whom were acting as adult establishment employees, as defined by Sedgwick County Code Sec. 17-503. Said violations include: multiple occasions of sexual acts and simulated sexual acts openly conducted with participation and/or acquiescence of management; employees performing adult entertainment services without being licensed to do so; and manager duties being performed by person(s) not authorized to do so.
- As a result of J.V. Diamond's negligent failure to supervise the licensed premises or the adult establishment, adult establishment employees, adult establishment patrons or other persons have: (i) engaged in conduct in violation of the provisions or requirements of the

Sedgwick County Adult Entertainment Code or of the provisions or requirements of the adult establishment license issued to J.V. Diamond; or (ii) committed morals charges on the licensed premises. *See Sedgwick County Code Sec. 17-614(b)(11).*

Your license is revoked effective August 28, 2015, unless you appeal this notice of revocation to the County Administrative Hearing Officer by filing a Notice of Appeal with the County Clerk on or before August 27, 2015. FILING OF A NOTICE OF APPEAL DOES NOT AUTOMATICALLY STAY THE REVOCATION. The revocation may only be stayed after a hearing by the County Administrative Hearing Officer and he or she finds that a substantial likelihood exists that the licensee will eventually prevail on the merits and that said licensee will suffer irreparable injury unless the stay is granted.

Sincerely,



Kelly B. Arnold
Sedgwick County Clerk

cc: Jezebels – on duty manager
Sheriff Jeff Easter, Sedgwick County Sheriff
Thomas Stolz, MABCD Director
Karen Powell, County Legal
Kansas Department of Revenue – Alcohol Beverage Control