

**UNITED STATES OF AMERICA
DEPARTMENT OF THE TREASURY
ALCOHOL AND TOBACCO TAX AND TRADE BUREAU**

In re:)	
)	
Order to Show Cause as to why)	Docket No. AF-101,031-AASUS
Apologue, LLC's Distilled Spirits Plant)	
Basic Permit IL-S-20049 should not be)	
suspended)	
)	
Respondent:)	
Apologue, LLC)	
400 E. Margaret St)	
Thornton, Illinois 60476)	
)	

STIPULATED SUSPENSION AGREEMENT

1. Introduction. This agreement (Agreement) is entered into by and between the United States Department of the Treasury, Alcohol and Tobacco Tax and Trade Bureau (TTB), and Apologue, LLC (Apologue) (collectively, the Parties).
2. Parties. TTB is a bureau of the United States Government responsible for, among other things, administering and enforcing certain laws and regulations governing beverage alcohol. Apologue holds a distilled spirits plant Basic Permit, IL-S-20049, pursuant to which it is authorized to engage in business as a distilled spirits plant at its premises located at 400 E. Margaret Street, Thornton, Illinois.
3. Stipulations. By executing this Agreement, the Parties stipulate and agree that the allegations contained in pages 2-5 of the Order to Show Cause (OTSC), issued to Apologue on June 20, 2025, are substantiated. Specifically, Apologue agrees that it willfully violated the conditions of its distilled spirits plant Basic Permit within the meaning of 27 U.S.C. § 204(e)(1).

4. Suspension. Apologue agrees that TTB's Deputy Assistant Administrator – Field Operations (DAAFO) will make the Initial Decision in this case, as provided for in 27 C.F.R. § 71.63, suspending Apologue's distilled spirits plant Basic Permit for a period of three days.
5. Suspension Period. The three-day suspension shall be served on consecutive days commencing at 12:00 a.m., prevailing local time, on July 9, 2025, and ending at 11:59 p.m., prevailing local time, on July 11, 2025.
6. Prohibited Activities. During the suspension period, Apologue acknowledges and agrees that it may not conduct any of the operations for which a permit is required pursuant to 27 U.S.C. § 203(b), either directly or indirectly, through its members, managers, officers, directors, shareholders, owners, employees, agents, independent contractors, or through any surrogate acting with or on behalf of such individuals or entities. Apologue acknowledges and agrees that any such operations conducted by itself and/or by any such individuals or entities during the suspension period will subject its permit to further action, including possible revocation. Apologue understands that operating without a permit will subject it to potential civil and/or criminal liability. During the Suspension Period, Apologue is forbidden from conducting those normal business activities that it otherwise would legally conduct through its Basic Permit. Activities that shall not be performed during the Suspension Period include, but are not limited to:
 - a. Distilling distilled spirits;
 - b. Rectifying and/or blending distilled spirits;
 - c. Bottling distilled spirits;

- d. Filling orders for distilled spirits for customers;
- e. Placing orders of distilled spirits for customers;
- f. Contracting to sell or offering to sell distilled spirits;
- g. Shipping in interstate or foreign commerce distilled spirits; or
- h. Advertising or disseminating, or causing to be advertised or disseminated, in interstate or foreign commerce, any advertisements of distilled spirits.

7. Permissible Activities. During the Suspension Period, Apologue may conduct activities that would allow maintenance of its current stock or inventory. Such activities include, but are not limited to:

- a. Activity that would only relate to maintaining or preserving distilled spirits which have already been distilled;
- b. Taking inventory of warehouse goods;
- c. Performing administrative activities such as bookkeeping;
- d. Rearranging warehouse stock; or
- e. Altering, changing, or creating, but not placing in interstate or foreign commerce, advertisements of distilled spirits.

8. Waiver of Right to Hearing. By executing this Agreement, Apologue hereby voluntarily waives its rights to request an administrative hearing on the merits of TTB's allegations and whether such allegations legally support permit suspension, as provided for in 27 C.F.R. § 71.60. Apologue is fully aware that it is under no obligation to waive this right but has elected to do so knowingly and voluntarily.

9. Waiver of Right to File Answer. Apologue hereby voluntarily waives its right to file an Answer as provided for in 27 C.F.R. § 71.64. Apologue is fully aware that it is under no obligation to waive this right but has elected to do so knowingly and voluntarily.

10. Waiver of Right to Appeal. By executing this Agreement, Apologue hereby voluntarily waives its right to appeal the suspension. Apologue is fully aware that it is under no obligation to waive this right but has elected to do so knowingly and voluntarily.
11. Future Violations. Apologue acknowledges that it is subject to the provisions of the Federal Alcoholic Administration Act, Title 27, United States Code, Sections 201 – 211, as amended, Chapter 51 of the Internal Revenue Code of 1986, Title 26, United States Code, as amended, and the regulations issued thereunder, and all other federal laws relating to beverage alcohol, and any implementing regulations thereunder, and that it is required to comply with those laws and regulations as a condition of its Basic Permit. Apologue further acknowledges that nothing contained in this Agreement shall in any way limit or restrict the authority of TTB to take appropriate action with respect to any violations of such laws or regulations that may occur for any periods outside of those explicitly identified in this Agreement.
12. Permit Discontinuance. Apologue communicated to the DAAFO that licenses issued to Apologue, by the states of Illinois, to operate at 400 E. Margaret Street in Thornton Illinois, are set to lapse July 31, 2025, and that Apologue is considering not renewing these licenses. As such, Apologue has agreed to voluntarily surrender Basic Permit IL-S-20049, pursuant to 27 U.S.C. § 204(g), and to file a notice of discontinuance of operations, pursuant to 27 C.F.R. § 19.147, in the event that it does not operate at the licensed premise described in this paragraph for a period of more than two years following the expiration of the state-issued licenses referenced in this paragraph. Apologue is responsible for obtaining any local/State permits if operations begin again within the two-year period.

13. Signatories. Each undersigned representative of the Parties to this Agreement certifies that he or she is fully authorized to enter into this Agreement and fully supports each of the terms and conditions hereof, and to execute and legally bind such Party to it. This Agreement may be executed in counterparts.
14. Service of Suspension Documents. Apologue agrees to accept concurrent service of this Agreement, the OTSC, the suspension decision and related documents.
15. Service of Notices. Each Party shall accept any notice by electronic mail directed at counsel for each Party, or to the person designated in section 16 and 17 of this Agreement, with respect to all matters arising under or relating to this Agreement.
16. Service on TTB. Deputy Assistant Administrator, Field Operations. 1310 G St., Box 12, Washington, D. C., 20005.
17. Service on Apologue. [REDACTED], CEO, 400 E. Margaret St, Thornton, Illinois 60476.
18. Jurisdiction. The Parties agree that the exclusive forum for any action concerning construction, implementation, enforcement or modification of this Agreement shall be the United States District Court for the District of Columbia.
19. Entire Agreement. This Agreement constitutes the entire understanding of the Parties with respect to its subject matter.
20. Effective Date. Apologue agrees that this Agreement is valid regardless of the date the DAAFO signs the Agreement, the Order to Show Cause, the Initial Decision, and/or the Order Suspending Permit and expressly waives any objections if the DAAFO signs any or all of those documents before Apologue signs this Agreement.

21. Disclosures. The Parties agree that no representations are made, express or implied, with respect to disclosure obligations related to the terms of this agreement which may be imposed on the Parties by Federal law or regulations.

IN WITNESS WHEREOF, the parties hereby execute the Agreement.

Date: _____

Deputy Assistant Administrator
(Field Operations)
Alcohol and Tobacco Tax and Trade Bureau
1310 G Street, NW
Washington, DC 20005

Date: 6/20/2025

CEO
Apologue, LLC
400 E. Margaret St
Thornton, IL 60476

DEPARTMENT OF THE TREASURY
ALCOHOL AND TOBACCO TAX AND TRADE BUREAU
ORDER TO SHOW CAUSE

UNITED STATES OF AMERICA, Judicial District of Northern District of Illinois	
In the matter of Permit Number(s): IL-S-20049	Case No. AF-101,031-AASUS
Issued to: (Name of Permittee) Apologue, LLC	
TO: (Name and address of permittee, show number, street, city, State, Zip Code) Apologue, LLC 400 E. Margaret St Thornton, IL 60476	

Whereas the undersigned, Appropriate TTB Officer, of the Alcohol and Tobacco Tax and Trade Bureau, has reason to believe, and does believe, that you have not conformed to the provisions of the laws and regulations as specified on pages(s) hereof: 2 - 5.

Now, therefore, by the authority stated below, you are hereby ordered to show cause why the below-stated action, upon the grounds specified on pages(s) hereof, should not be taken. Within 15 days of the service of this citation you must file with the undersigned, Appropriate TTB Officer, either a written answer or a request for a hearing. Failure to file an answer or request a hearing within 15 days will be deemed a waiver of your right to contest the grounds for the action, and your right to a hearing, and the undersigned, Appropriate TTB Officer, may issue an order taking the action specified below.

1. Authority for Action

<input type="checkbox"/> Title 26 United States Code Section 5171 (b)	<input type="checkbox"/> Title 26 United States Code Section 5271	<input type="checkbox"/> Title 26 United States Code Section 5181	<input type="checkbox"/> Title 26 United States Code Section 5713	<input checked="" type="checkbox"/> Federal Alcohol Administration Section 4(e)
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2. Name of Administrative Law Judge N/A	3. Permit Action to be taken <input checked="" type="checkbox"/> Suspension <input type="checkbox"/> Revocation <input type="checkbox"/> Annulment
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4. Place and Time of Hearing (Check one)

☒ The place and time of hearing will be shown in a separate order to be issued within 30 days from the date of service of this order.
☐ The place and time of hearing will be as shown below.

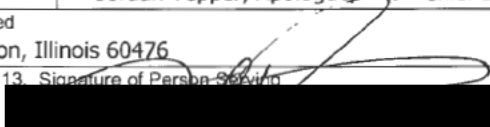
5. Place of hearing N/A	6. Date and Time of Hearing N/A
Date N/A	

7. The undersigned, Appropriate TTB Officer, Alcohol and Tobacco Tax and Trade Bureau

Date 06/20/2025	Signature 	Digitally signed by Date: 2025.06.20 14:44:04 -04'00'	Title Deputy Assistant Admin (Field Operations)
---------------------------	--	--	---

8. I hereby certify that on the date stated below, I served the foregoing notice on the person named below at the place mentioned, by

☐ Delivering a copy of such notice to such person. ☒ Registered mail to such person at the address stated below.

9. Date Notice Served 6/20/2025	10. Name of Person Served (if service be on partner or officer of corporation, state such fact) Jordan Tepper, Apologue, LLC - Chief Executive Officer	
11. Address Where Notice Served 400 E. Margaret St, Thornton, Illinois 60476		
12. Date 6/20/2025	13. Signature of Person Served 	14. Title Senior Counsel (Field Operations)

GROUNDS FOR CONTEMPLATED ACTION ARE ATTACHED

TTB Form 5000.6
Apologue, LLC
400 E. Margaret St
Thornton, Illinois 60476

GROUND

The Deputy Assistant Administrator, Field Operations (DAAFO), of the Alcohol and Tobacco Tax and Trade Bureau (TTB), United States Treasury Department, has reason to believe and does believe that Apologue LLC (Apologue), holder of Basic Permit number (IL-S-20049), issued under the Federal Alcohol Administration (FAA) Act, Title 27, United States Code, Sections 201 – 211, has willfully violated the conditions of its Basic Permit as set forth below.

I. Opportunity for Compliance

The DAAFO alleges that the violations averred herein are willful. As such, affording Apologue an opportunity to demonstrate or achieve compliance prior to issuance of this Order to Show Cause is not warranted. 27 C.F.R. § 71.35.

II. Notice of Contemplated Action

Apologue willfully and knowingly violated the conditions of its Basic Permit on multiple occasions between June 2022 and June 2023. Based on the foregoing, and on the serious nature of the violations, the DAAFO believes that any settlement short of suspension would be inapposite in this case. The DAAFO further believes that the evidence supporting these violations is conclusive. 27 C.F.R. § 71.38.

III. Background

An FAA Act Basic Permit is conditioned in pertinent part upon compliance with the requirements of section 205 of the FAA Act (27 U.S.C. § 205) and with all other federal laws relating to beverage alcohol, including taxes with respect thereto. 27 U.S.C.

§ 204(d). TTB may suspend a Basic Permit issued under the FAA Act if its holder willfully violates any of the conditions of such permit. 27 U.S.C. § 204(e)(1).

IV. Alleged Violations

1. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
2. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
3. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

- [REDACTED]
- [REDACTED]
4. [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
5. [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
6. A label for Apologue's Aronia Berry Liqueur (approximately 50 cases), included changes that are not part of TTB's allowable revisions policy. These actions resulted in violations of 27 C.F.R. § 5.22(a).
7. [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
8. [REDACTED]
- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

For the reasons set forth above, the DAAFO has reason to believe and does believe that Apologue willfully violated the conditions of its Basic Permit. Therefore, the DAAFO has issued this Order to Show Cause as to why Basic Permit IL-S-20049, issued to Apologue, should not be suspended.

**UNITED STATES OF AMERICA
DEPARTMENT OF THE TREASURY
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Order to Show Cause as to why)	Docket No. AF-101,031-AASUS
Apologue, LLC's Distilled Spirits Plant)	
Basic Permit IL-S-20049 should not be)	
suspended)	
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Respondent:)	
Apologue, LLC)	
400 E. Margaret St)	
Thornton, Illinois 60476)	
)	

INITIAL DECISION

On or about June 20, 2025, the Deputy Assistant Administrator, Field Operations (DAAFO), of the Alcohol and Tobacco Tax and Trade Bureau (TTB) issued an Order to Show Cause (OTSC) (Form TTB F 5000.6) as to why Apologue, LLC's (Apologue), distilled spirits plant (DSP) Basic Permit (IL-S-20049) should not be suspended.

The DAAFO, alleged in the OTSC, that Apologue willfully violated the conditions of its DSP Basic Permit issued under 27 U.S.C. § 203(a) and its implementing regulations, Title 27, Code of Federal Regulations; Basic Permits being conditioned on the permittee's compliance with the applicable provisions of 27 U.S.C., the XXI Amendment and laws relating to its enforcement; all other Federal laws relating to distilled spirits, including taxes with respect to them; the Federal Water Pollution Control Act; and, all applicable regulations made pursuant to law.

The specific bases for issuance of the OTSC are set forth in the OTSC and the attachment thereto. Apologue agreed with the DAAFO's findings and further agreed to a stipulated suspension of Apologue's Basic Permit.

Given Apologue's acquiescence to the proposed suspension of its Basic Permit, TTB is treating Apologue's actions consistent with 27 C.F.R. § 71.63. Therefore, under the authority of 27 C.F.R. § 71.79(b), TTB makes the following Findings and Decision.

EVIDENCE PRESENTED BY THE GOVERNMENT

1. The OTSC, and attachment thereto, issued June 20, 2025, which is hereby incorporated by reference with the same force and effect as if fully set forth herein; and
2. Stipulated Suspension Agreement, executed on June 20, 2025 which is hereby incorporated by reference with the same force and effect as if fully set forth herein, wherein Apologue admits to the violations alleged in the OTSC and agrees to a three-day permit suspension.

FINDINGS AND CONCLUSIONS

1. Apologue was afforded due notice, opportunity for a hearing, and opportunity to file an answer.
2. Apologue knowingly and voluntarily waived its rights to a hearing and to file an answer.
3. Apologue has admitted the allegations contained in the OTSC.
4. Based on the foregoing, Apologue's authority to operate under Basic Permit No. IL-S-20049 may and should be suspended for a period of three days.

DECISION AND ORDER

1. In pertinent part, Basic Permits issued pursuant to the Federal Alcohol Administration Act (FAA Act), 27 U.S.C. § 201-211, are conditioned upon compliance with the requirements of 27 U.S.C. §§ 205 and 206 “and with all other Federal laws relating to distilled spirits, wine, and malt beverages, including taxes with respect thereto.” 27 U.S.C. § 204(d).
2. Apologue is a TTB-permitted DSP located in Thornton, Illinois.
3. Apologue willfully violated the conditions of its Basic Permit in the following manner and instances:

a. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

b. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- c. [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- d. [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- e. [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- f. A label for Apologue's Aronia Berry Liqueur (approximately 50 cases), included changes that are not part of TTB's allowable revisions policy. These actions resulted in violations of 27 C.F.R. § 5.22(a).

- g. [REDACTED]
[REDACTED]
[REDACTED]
 I [REDACTED]
 I [REDACTED]
 I [REDACTED]
 [REDACTED]

- h. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

4. TTB may suspend a Basic Permit issued under the FAA Act if its holder willfully violates any of the conditions of the permit. 27 U.S.C. § 204(e)(1).

[THIS PORTION INTENTIONALLY LEFT BLANK]

Based on the foregoing, the DAAFO finds that Apologue willfully violated the conditions of its DSP Basic Permit as detailed in the OTSC and attachment thereto. Accordingly, Apologue's authority to operate under Basic Permit No. IL-S-20049 is to be suspended for a period of three days. It is, therefore, **ORDERED** that the period of suspension will and shall be July 9 to July 11, 2025.

Date: _____

Digitally signed by _____

Deputy Assistant Administrator
(Field Operations)
Alcohol and Tobacco Tax and Trade Bureau
1310 G Street, NW
Washington, DC 20005