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File No. 46700.61133

December 9, 2024

**VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED &
U.S. MAIL AND ELECTRONIC MAIL (RONY@GLOBALBRANDSCO.COM)**

Bethlehem Ajam One, Inc.
c/o Roni Hannoona (Agent/CEO)
317 North Euclid Avenue
Ontario, CA 91762

Re: 317 North Euclid Avenue, Ontario, CA 91762
(APN 1048-566-05-0-000)
("Subject Property")
DEMAND TO CEASE AND DESIST UNLAWFUL BUSINESS ACTIVITY /
NOTICE OF INTENTION TO FILE A LAWSUIT

Dear Mr. Hannoona:

As you are aware, Best Best and Krieger LLP serves as the City Attorney for the City of Ontario ("City"). After our initial cease and desist letter dated April 24, 2024, City staff and I met with you, your children, and your architect, in person at City Hall on or about May 7, 2024. At that meeting, we discussed the expired permits and the fact that the CUP for a banquet hall was null and void due to your failure to meet the conditions of the CUP. We also explained that a banquet hall is no longer allowed in the Euclid Avenue Protection Corridor of the MU-1/LUA-1 (Downtown Mixed Use/Euclid Avenue Entertainment) zone or the MU-RC (Downtown Mixed-Use Retail Core) zoning district of the Downtown West Planned Unit Development.

At that meeting we discussed that you intended to use the Property to open a restaurant and we informed you that an ancillary use for a banquet space is permissible provided that the restaurant is the primary use. Your architect explained he needed more time to develop plans for a restaurant. After our meeting, we thought you were in the process of developing plans for the restaurant that you and your children proposed in May, but we see that is not the case. I am informed that plans were recently submitted for a commercial kitchen, but not for a fully functioning restaurant as we discussed earlier this year in May. Therefore, the plans have been rejected. You may continue to pursue the restaurant use by submitting tenant improvement plans that provide for a fully functioning restaurant, as we discussed in May, which must include proper dining/seating areas and other characteristics that are common to a restaurant operation.

The purpose of this letter is to clarify in writing, that CUP File No. PCUP16-011 is null and void due to your failure to meet the conditions therein. All permits associated with that PCUP

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have been expired. The primary use of the Subject Property as a banquet facility is not allowed, as explained in our meeting in May. Accordingly, should you continue to hold events at the Property, the City will take proactive measures to prevent the occupancy of the building for public gatherings. These measures may include issuing civil penalties for any events held, cutting off power to the Property and/or filing a lawsuit to seek an injunction against you.

If you have any questions or need further clarification regarding the contents of this letter, please feel free to contact me at (909) 989-8584. An appointment is required should you wish to meet with the City's attorney in person.

Sincerely,



Charisse Smith
for BEST BEST & KRIEGER LLP

CS:

cc: Angela Magana
James Caro
Rudy Zeledon
Henry K. Noh
Admin Team