

**BEFORE THE LOCAL LIQUOR AND BEER  
LICENSING AUTHORITY,  
CITY OF COLORADO SPRINGS,  
STATE OF COLORADO**

Address: 30 South Nevada Avenue, Suite 101  
Colorado Springs, CO 80903  
Telephone: (719) 385-5901  
Fax Number: (719) 385-5114  
Email: cityclerk@coloradosprings.gov

**CITY CLERK'S OFFICE**

**2023 FEB -3 P 12: 41**

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**IN THE MATTER OF:  
APPLICATION FOR RENEWAL OF HOTEL and  
RESTAURANT LIQUOR LICENSE SUBMITTED BY:**

**BABILONIA, LLC**  
d/b/a PARADISE NIGHTCLUB & RESTAURANT  
2501 E. Platte Avenue  
Colorado Springs, CO 80909  
**LICENSEE**

**License No.: 851468**

**ATTORNEY FOR THE CITY OF COLORADO SPRINGS**

Shantel Withrow, Colo. Reg. No. 46227  
Division Chief – Prosecution  
224 E. Kiowa Street, Suite 410  
Colorado Springs, CO 80903  
Telephone: 719-385-5925

**ATTORNEY FOR THE LICENSEE**

Will Cook, Colo. Reg. No. 31357  
115 E. Costilla Street  
Colorado Springs, CO 80903  
Telephone: 719-477-1285

**NOTICE OF POSTPONED RENEWAL HEARING**

**WHEREAS**, this matter came before the Local Licensing Authority Hearing Officer Matthew D. Ramirez for hearing on Friday, February 3, 2023 at 9:00 A.M. in Division 2, Municipal Court Building, 224 E. Kiowa Street, Colorado Springs, CO 80903 regarding an application by Babilonia, LLC d/b/a Paradise Nightclub & Restaurant ("Licensee") for a renewal of the Hotel and Restaurant Liquor License at 2501 E. Platte Avenue, Colorado Springs, CO 80909, as outlined in the Notice of Objections and Order for Renewal Hearing dated January 6, 2023 and in the Notice of Postponed Hearing dated January 20, 2023, both of which are incorporated herein by reference; and

**WHEREAS**, on February 1, 2023 the Licensee filed a Motion to Continue the scheduled hearing, incorporated herein by reference; and

**WHEREAS**, on February 2, 2023 Hearing Officer Ramirez granted the Motion and issued an Order for Continuance of this matter to the Liquor and Beer License Hearing meeting of Friday, March 3, 2023 at 9:00 A.M., incorporated herein by reference.

### **NOTICE OF POSTPONED HEARING**

**NOW THEREFORE**, pursuant to the Hearing Officer's order and Rule No. 4.03 of the Liquor and Beer Rules and Regulations for the City of Colorado Springs ("City Rules"), **YOU ARE HEREBY NOTIFIED** that the Renewal Hearing will be held by the Local Licensing Authority Hearing Officer on **Friday, March 3, 2023 at 9:00 A.M. in Division 2, Municipal Court Building, 224 E. Kiowa Street, Colorado Springs, CO 80903**, or at such other time and place as the Local Licensing Authority may direct where a **RENEWAL HEARING** will be held to determine if your Hotel and Restaurant Liquor License should be renewed, denied, or suspended as by law provided. Said hearing is conducted pursuant to C.R.S. §44-3-601 and §2.5.601 of the Code of the City of Colorado Springs, 2001 as amended ("City Code"), and Rules 14.03 and 20.00 of the Liquor and Beer Rules and Regulations for the City of Colorado Springs ("Local Rules").

If you have any questions concerning these proceedings, you should contact Shantel Withrow, Division Chief - Prosecution, at (719) 385-5925.

**ON BEHALF OF THE LOCAL LICENSING AUTHORITY done February 3, 2023.**

FOR THE CITY OF COLORADO SPRINGS  
LOCAL LICENSING AUTHORITY



Sarah B. Johnson  
City Clerk

## CERTIFICATE OF MAILING

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I hereby certify that I have mailed a true copy of the foregoing **NOTICE OF POSTPONED HEARING** by United States mail, first class postage paid, on February 3, 2023 to the following addresses of record:

BABILONIA, LLC  
d/b/a PARADISE NIGHTCLUB & RESTAURANT  
2501 E. Platte Avenue  
Colorado Springs, CO 80909

CC: tiropnc@gmail.com  
willcooklawoffice@gmail.com  
damon@lawfirmwkc.com  
dmiller@dulaneymillerlaw.com



Lee McRae  
License Enforcement Officer  
City Clerk's Office  
30 S. Nevada Avenue  
Colorado Springs, CO 80903

**BEFORE THE LOCAL LIQUOR AND BEER  
LICENSING AUTHORITY,  
CITY OF COLORADO SPRINGS,  
STATE OF COLORADO**

Address: 30 South Nevada Avenue, Suite 101  
Colorado Springs, CO 80903  
Telephone: (719) 385-5901  
Fax Number: (719) 385-5114  
Email: cityclerk@coloradosprings.gov

**CITY CLERK'S OFFICE**

**2023 FEB -2 A 9 06**

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**IN THE MATTER OF:  
APPLICATION FOR RENEWAL OF HOTEL and  
RESTAURANT LIQUOR LICENSE SUBMITTED BY:**

**BABILONIA, LLC**  
d/b/a PARADISE NIGHTCLUB & RESTAURANT  
2501 E. Platte Avenue  
Colorado Springs, CO 80909  
**LICENSEE**

**License No.: 851468**

**ATTORNEY FOR THE CITY OF COLORADO SPRINGS**

Shantel Withrow, Colo. Reg. No. 46227  
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224 E. Kiowa Street, Suite 410  
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**ATTORNEY FOR THE LICENSEE**

Will Cook, Colo. Reg. No. 31357  
115 E. Costilla Street  
Colorado Springs, CO 80903  
Telephone: 719-477-1285

**ORDER RE LICENSEE MOTION TO CONTINUE**

**THIS MATTER** comes before the Licensing Authority on Friday, **February 3, 2023 at 9:00 A.M.** in Division 2, Municipal Court Building, 224 E. Kiowa Street, Colorado Springs, CO, 80903, for a Renewal Hearing of the Licensee's Hotel and Restaurant Liquor License as outlined in the Notice of Objections and Order for Renewal Hearing dated January 6, 2023 and in the Notice of Postponed Hearing dated January 20, 2023, both of which are incorporated herein by reference.

**WHEREAS**, on February 1, 2023 the Licensee filed a Motion to Continue the scheduled hearing. The Hearing Officer, having considered the matters contained therein, and without objection from the City **HEREBY GRANTS** said continuance.

**NOW THEREFORE** the above matter is ORDERED continued to Friday, **March 3, 2023 at 9:00 A.M.** in Division 2, Municipal Court Building, 224 E. Kiowa Street, Colorado Springs, CO, 80903 or other such date and time as the Authority may direct. The Hearing Officer will make official public notice of the continuance on the record at the scheduled Liquor and Beer License hearing on Friday, February 3, 2023.

**IT IS FURTHER ORDERED** that a subsequent Notice of Postponed Hearing shall be issued to the above-mentioned Licensee and any persons of record that have objected to the renewal of the license.

Done this 2<sup>nd</sup> day of February, 2023

FOR THE LICENSING AUTHORITY  
CITY OF COLORADO SPRINGS

/s/ Matthew D. Ramirez  
Matthew D. Ramirez  
Hearing Officer

**FOR THE CITY OF COLORADO SPRINGS**  
**BEFORE THE LOCAL LIQUOR AND BEER LICENSING AUTHORITY.**  
City of Colorado Springs, Colorado

IN THE MATTER OF:

Application for Renewal of Hotel and Restaurant Liquor License  
Submitted By:

Babilonia, LLC

d/b/a Paradise Nightclub and Restaurant  
2501 E. Platte Ave.  
Colorado Springs, CO 80909  
Licensee

**CITY CLERK'S OFFICE**

**2023 FEB -1 P 12:17**

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Earl W. Cook, Jr. Esq.  
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Colorado Springs, CO 80903  
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Fax: 1-719-520-3536  
E-mail: willcooklawoffice@gmail.com  
Atty. Reg. # 31357

License Number: 851468

**MOTION TO CONTINUE HEARING SCHEDULED FOR February 3, 2023.**

COMES NOW, Earl W. Cook, Jr., and hereby files this motion to continue the Alcohol license renewal hearing presently set for February 3, 2023. This matter was originally set on January 20, 2023. Judge Michelle Price was presiding over the matter and had concerns of a conflict with one of the witnesses that was testifying at the hearing. Based on this conflict, Judge Price recused herself and matter was reset till February 3, 2023. Present counsel is not able to appear at the February 3, 2023 hearing due to prior conflicting court appearances. Counsel is also set for an all day preliminary hearing on a First Degree murder case with four co-defendants on February 3, 2023 as well.

The Defendants in the murder case are all in custody and require Spanish interpreter. Due to conflicting Court schedules, Mr. Cook is unable to attend the Liquor renewal Board hearing. Attorney Damon Cassens has been contacted and is able to take over representation for the Licensee but he is not available on February 3, 2023.

Counsel has conferred with the City Attorney's Office about this request for continuance and there was no objection voiced by the City Attorney. The City Attorney also indicated it would be appropriate to file a joint stipulated motion to continue. The City Attorney and Licensee would stipulate to the next renewal hearing date in this matter be reset till March 3, 2023.

DATED: February 1, 2023

Respectfully Submitted,

*/s/ Earl W. Cook, Jr.*

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Earl W. Cook, Jr.  
115 East Costilla Street  
Colorado Springs, CO 80903  
Tel: 719-477-1285  
Fax: 1-719-520-3536

City Attorney's Office  
Colorado Springs Municipal Court  
224 E. Kiowa Street  
Colorado Springs, CO 80903

*Via Email: [prosecution.attorney@coloradosprings.gov](mailto:prosecution.attorney@coloradosprings.gov)*