

**UNITED STATE DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

CHEF GEOFF'S, and GEOFF TRACY,

Case No. _____

Plaintiffs,

v.

The VIRGINIA ALCOHOLIC BEVERAGE CONTROL AUTHORITY, the VIRGINIA DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL, TRAVIS HILL, in his official capacity as the Chief Executive Officer of the Alcoholic Beverage Control Authority, JEFFREY PAINTER, in his official capacity as the Chair of the Virginia Alcoholic Beverage Control Authority Board, MARIA J. K. EVERETT, in her official capacity as a member of the Virginia Alcoholic Beverage Control Authority Board, BETH HUNGATE-NOLAND, in her official capacity as a member of the Virginia Alcoholic Beverage Control Authority Board, MARK RUBIN, in his official capacity as a member of the Virginia Alcoholic Beverage Control Authority Board, and KATIE KELLY, in her official capacity as the Senior Special Agent for the Virginia Alcoholic Beverage Control Authority,

Defendants.

COMPLAINT

INTRODUCTION

1. In Virginia, it's perfectly legal for businesses to offer happy hour—it's just not legal for them to talk about it. The state's happy hour advertising restrictions, 3 Va. Admin. Code § 5-50-160, prohibit businesses from communicating entirely truthful and non-misleading information to their customers on the theory that censorship, when it pertains to alcohol, is for the consumer's own good. These outdated and paternalistic notions cannot justify the state's unconstitutional burdens on speech.

2. Virginia's happy hour advertising restrictions affect business owners like Chef Geoff Tracy, an entrepreneur, cookbook author, and owner of three restaurants in the Washington, D.C., metropolitan area—including Chef Geoff's-Tyson's Corner. Geoff currently owns and operates two eponymous "Chef Geoff's," restaurants, one in Vienna, Virginia, and one in Washington, D.C., as well as Lia's Restaurant, located in Chevy Chase, Maryland.

3. One of the ways in which Chef Geoff¹ tries to beat the competition and attract new customers is by offering happy hour specials in a town well-known for its love of happy hour. Geoff attributes part of his restaurants' success to his popular happy hour offerings, and his restaurants' mission statement, "Great food, libation, merriment," reflects that. To that end, he advertises his happy hour specials in various mediums, including direct mail campaigns, signs outside his restaurants, his restaurants' website and Facebook pages, and his personal Twitter account. But Virginia's happy hour advertising restrictions makes it a crime for him to make those statements, because it prohibits, among other things, advertising the discount offered or the price of any happy hour drink, and it forbids restaurants from using any term to describe its offerings other than the generic "happy hour" or "drink specials." This means that Geoff cannot advertise

¹ For ease of reference, Plaintiffs are hereby collectively referred to as "Chef Geoff."

“\$7.50 cocktails,” or “Wine down Wednesday.” It also essentially renders happy hour advertisements uninformative to consumers.

4. Chef Geoff does not seek to advertise to children, or to promote illegal activity, or to encourage excessive drinking. Instead he seeks to communicate truthful information about his legal business practices to the public. There is no “vice” exception to the First Amendment, and the Constitution thus guarantees Chef Geoff’s right to talk about happy hour. He therefore brings this civil-rights lawsuit pursuant to 42 U.S.C. § 1983 to vindicate his right to speak freely.

JURISDICTION AND VENUE

5. Plaintiffs bring this civil rights lawsuit pursuant to 42 U.S.C. § 1983, for the violation of rights secured by the First Amendment to the United States Constitution, as applied to the states by the Fourteenth Amendment.

6. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 (federal question), 1343 (civil rights), and 2201-2202 (Declaratory Judgment Act).

7. Venue is proper under 28 U.S.C. §1391(b), on the ground that all or a substantial part of the acts giving rise to Plaintiffs’ claims occur in the Eastern District of Virginia, and on the ground that some or all of the Defendants reside in the Eastern District of Virginia.

PARTIES

Plaintiffs

8. Geoff Tracy is a chef and restaurateur, and owner of Chef Geoff’s-Tyson’s Corner. He opened his first two restaurants, in the words of his wife, “through sheer force of will,” before the age of 30. His restaurants now serve hundreds of thousands of patrons each year and employ over 100 people. Geoff is an active member of the DC-metropolitan community, having served

as chairman of the executive board of the Restaurant Association of Metropolitan Washington, and has earned multiple awards for his restaurants and philanthropic work in the community.

9. Chef Geoff's-Tyson's Corner is one of Geoff's three restaurants. It is an S-Corp organized as CG4, Inc. under the laws of Virginia. In 2011, it won the RAMMY award for "Hottest Restaurant Bar Scene."

Defendants

10. Virginia Alcoholic Beverage Control Authority (Authority) is an independent political subdivision of the State of Virginia tasked with enforcing the state's liquor laws. Historically, that power has been wielded by Department of Alcoholic Beverage Control (ABC), which is in the process of converting to the Authority. At present, both the Authority and ABC are dually operating and full conversion is expected in July, 2018. The Authority and ABC can be sued under Va. Stat. § 4.1-103(1).

11. Travis Hill is the Chief Executive Officer of the Authority. Jeffrey Painter is the former chair of the ABC Board and current chair of the Authority. Maria Everett is the Chair of the ABC Board and a board member of the Authority. Beth Hungate-Noland is a board member of both the ABC and the Authority. Mark Rubin is a board member of the Authority. As members of the Board, they are responsible for enforcing the happy hour restrictions and disciplining those who do not comply. In all of their actions and omissions alleged herein, Defendants were acting under the color of state law and are being sued only in their official capacity pursuant to *Ex parte Young*, 209 U.S. 123 (1908).

12. Katie Kelley is Senior Special Agent for the ABC and Authority. Ms. Kelley, in her official capacity, is authorized to and responsible for citing and enforcing the happy hour restrictions. In all of her actions and omissions alleged herein, Ms. Kelley was acting under the

color of state law and is being sued only in her official capacity pursuant to *Ex parte Young*, 209 U.S. 123 (1908).

FACTUAL ALLEGATIONS

Plaintiffs Free Speech Interests

13. As at his other locations, Geoff Tracy offers happy hour at Chef Geoff's-Tyson's Corner on Wednesdays through Sundays, 3pm-7pm, and all day Monday and Tuesday until 9pm. As part of the happy hour specials, Chef Geoff's-Tyson's Corner sells discounted cocktails, beers, and wines, as well as discounted food offerings, like pizza, half price burgers, \$11 "pasta madness," tacos, and dessert. On Wednesday, the restaurant offers "Wednesday Wine Night," where bottles of wine are half-priced.

14. Chef Geoff fully complies with all Virginia rules and regulations pertaining to serving and selling drinks at happy hour. That is, he abides by the state's prohibition on giving away free drinks, or permitting patrons to have more than two drinks at any one time under 3 VAC § 5-50-160.

15. To attract consumers to the restaurant, Chef Geoff advertises his happy hour specials. Competition is rampant in the restaurant industry, and one way to gain an advantage is to compete based on price. Chef Geoff believes that his popular happy hour pricing and particular drink offerings are among the reasons his business is successful.

16. Chef Geoff advertises in many forms. One way in which he advertises is through physical advertisements outside of his restaurant, including displaying the happy hour menu. He also conducts direct mail campaigns, and has historically placed ads in newspapers.

17. Chef Geoff also advertises online through social media.

18. Chef Geoff does not seek to advertise anything illegal. Rather, he seeks only to advertise the drink specials he offers, which are fully compliant with Virginia law.

Virginia's Happy Hour Speech Code

19. Virginia law permits businesses to offer happy hour specials, but restricts what they may say about them under the state's happy hour advertising restrictions. 3 Va. Admin. Code § 5-50-160.

20. For example, while restaurants may advertise that they have "drink specials," they cannot advertise the price of any drink, or what the special is.

21. In addition, they may not use any term to describe their specials other than the generic terms "happy hour" or "drink specials." This means that terms like "Turn Down for What Tuesday," "Wednesday Wine Night," "Thirsty Thursday," "Sunday Funday," and even simply "discounted drinks," are prohibited.

22. While businesses may legally offer half-price drinks, they are prohibited from offering "two-for-one" specials.

23. The happy hour advertising restrictions mean that businesses are essentially limited to saying "Happy Hour," the time of the specials, and the names of the discounted drinks, rendering the advertisement largely unhelpful to both consumers and businesses.

24. A first time violator of any of these restrictions is subject to a penalty of \$500, or they may suffer a 7-day suspension of their liquor license—effectively shutting them down for a week.

25. Defendants regularly enforce the happy hour advertising restrictions by citing offenders and imposing penalties.

26. Because of Virginia's happy hour advertising restrictions, and only because of those restrictions, Chef Geoff is prohibited from communicating entirely truthful information about his business practices to the public. That law prevents Chef Geoff from speaking as he would like to speak, and from making the same statements in Virginia that he makes in Maryland and Washington, D.C.

27. But for Virginia's happy hour advertising restrictions, Chef Geoff would advertise prices, discounts, and use festive terms like "Wednesday Wine Night" to promote his restaurant.

28. Chef Geoff seeks to be free of Virginia's unconstitutional gag rule on free speech so that he can advertise without fear of penalty.

CLAIMS FOR RELIEF

Count I: Virginia's Ban on Truthful, Non-Misleading

Communications Is an Unconstitutional Content-Based

Restrictions on Speech That Violates the First Amendment

29. Chef Geoff incorporates and re-alleges each and every allegation contained in the preceding paragraphs of this Complaint.

30. Chef Geoff seeks to advertise truthful, non-misleading information about his legal business practices, including the specials and price of drinks offered during happy hour. He also seeks to promote his happy hour specials in creative, non-generic terms, including puns, exclamations, and allusions.

31. Virginia law prohibits him from making these statements, on penalty of fines and suspension of his license. He therefore suffers harm due to Defendants' enforcement of the challenged laws.

32. The happy hour advertising restrictions apply to Chef Geoff because of the content of his speech. That is, the laws apply to him solely when discussing happy hour specials. By contrast, it is legal for him to discuss prices for non-happy hour related items.

33. The happy hour restrictions do not directly advance any substantial government interest.

34. The happy hour restrictions are not narrowly tailored to any compelling state interest.

35. Sheltering consumers from truthful, non-misleading speech “for their own good” is not a substantial, nor compelling, state interest.

36. Restricting speech related to happy hour specials does not reduce alcohol consumption.

37. Defendants have alternative means, other than restricting speech, to achieve their goals. If Defendants are concerned with promoting temperance, for example, they could engage in educational campaigns about the purported benefits of temperance.

38. The First Amendment protects Chef Geoff’s right to express himself in ways banned by the happy hour advertising restrictions. There is no “vice” exception to the First Amendment.

39. By enforcing Virginia’s happy hour advertising restrictions, Defendants, acting under color of state law, are depriving Chef Geoff of his constitutional right to speak freely under the First Amendment.

40. Chef Geoff is suffering and will continue to suffer substantial and irreparable harm unless Virginia’s happy hour advertising restrictions are declared unlawful and enjoined by this Court.

41. There exists a present controversy between the parties as to their respective legal rights and duties. Chef Geoff contends that Defendants are violating the First Amendment; Defendants, by enforcing the happy hour advertising restrictions, dispute that contention. Therefore, there exists a present controversy between the parties concerning the constitutionality of the statute by which Chef Geoff is being directly, adversely, and irreparably harmed by Defendants' enforcement.

42. A judicial determination of rights and responsibilities arising from this actual controversy is therefore necessary and appropriate.

Count II: Virginia's Ban on "Two-for-One" Specials Is an Unconstitutional Restriction on Speech Under the First Amendment

43. Chef Geoff reincorporates and re-alleges each and every allegation contained in the preceding paragraphs of the Complaint.

44. Under Virginia law, it is perfectly legal to offer two drinks during happy hour for the price ordinarily charged for one, so long as the special is expressed as "half-price."

45. However, it is illegal to offer the same special if expressed as a "two-for-one."

46. The only difference between offering two drinks, each for half-price, and offering two-for-one, is how the offer is described.

47. The ban on two-for-one specials is therefore a restriction on speech.

48. The ban on two-for-one specials deprives establishments from offering a special in the most effective way.

49. That restriction does not directly advance any substantial government interest.

50. That restriction is not narrowly tailored to any compelling state interest.

51. By enforcing this restriction on speech, Defendants, acting under color of state law, are depriving Chef Geoff of his constitutional right to speak freely under the First Amendment.

52. Chef Geoff is suffering and will continue to suffer substantial and irreparable harm unless Virginia's happy hour advertising restrictions are declared unlawful and enjoined by this Court.

53. There exists a present controversy between the parties as to their respective legal rights and duties. Chef Geoff contends that Defendants are violating the First Amendment; Defendants, by enforcing the happy hour advertising restrictions, dispute that contention. Therefore, there exists a present controversy between the parties concerning the constitutionality of the statute by which Chef Geoff is being directly, adversely, and irreparably harmed by Defendants' enforcement.

54. A judicial determination of rights and responsibilities arising from this actual controversy is therefore necessary and appropriate.

REQUESTED RELIEF

Plaintiffs respectfully request that the Court:

A. Declare the happy hour speech code, 3 VAC § 5-50-160, facially and as applied to Plaintiffs, unconstitutional under the First Amendment.

B. Enjoin Defendants, their employees, agents, successors and assigns, and all persons acting in concert with them, from continuing to enforce the happy hour speech code, as well as any and all implementing administrative rules and regulations, and the practices and policies by which Defendants enforce these provisions; against Plaintiffs or any other person.

C. Award Plaintiffs their costs and reasonable attorney fees pursuant to 42 U.S.C. § 1988.

D. Grant such other relief that this Court deems just and proper.

DATED: March 28, 2018.

Respectfully Submitted,

/s/ Thomas A. Berry

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Counsel for Plaintiffs

Chef Geoff's and Geoff Tracy

**Pro Hac Vice Pending*

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Chef Geoff's and Geoff Tracy

(b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) Thomas A. Berry, Anastasia P. Boden Pacific Legal Foundation, 930 G Street, Sacramento, CA 95814 916-419-7111

DEFENDANTS

see attachment

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship and business location (Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation).

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Large table with categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District (specify), 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 U.S.C. § 1983

Brief description of cause:

First Amendment challenge to Virginia's happy hour advertising restrictions

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 0.00 CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE SIGNATURE OF ATTORNEY OF RECORD

03/28/2018 /s/ Thomas A. Berry

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I. **(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) **County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) **Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

- II. **Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 - United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 - United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 - Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 - Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)

- III. **Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

- IV. **Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).

- V. **Origin.** Place an "X" in one of the seven boxes.
 - Original Proceedings. (1) Cases which originate in the United States district courts.
 - Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
 - Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 - Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 - Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 - Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 - Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.

PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.

- VI. **Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service

- VII. **Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P. Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction. Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

- VIII. **Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

Civil Cover Sheet Attachment

The VIRGINIA ALCOHOLIC BEVERAGE CONTROL AUTHORITY,
the VIRGINIA DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL,
TRAVIS HILL, in his official capacity as the Chief Executive Officer of the Alcoholic Beverage
Control Authority,
JEFFREY PAINTER, in his official capacity as the Chair of the Virginia Alcoholic Beverage
Control Authority Board,
MARIA J. K. EVERETT, in her official capacity as a member of the Virginia Alcoholic
Beverage Control Authority Board,
BETH HUNGATE-NOLAND, in her official capacity as a member of the Virginia Alcoholic
Beverage Control Authority Board,
MARK RUBIN, in his official capacity as a member of the Virginia Alcoholic Beverage Control
Authority Board, and
KATIE KELLY, in her official capacity as the Senior Special Agent for the Virginia Alcoholic
Beverage Control Authority Board,

Defendants.

Kiren Mathews

From: cmecf@vaed.uscourts.gov
Sent: Friday, March 30, 2018 7:03 AM
To: Courtmail@vaed.uscourts.gov
Subject: Activity in Case 1:18-cv-00360-AJT-IDDVAED Chef Geoff's et al v. The Virginia Alcoholic Beverage Control Authority et al Complaint

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

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U.S. District Court

Eastern District of Virginia -

Notice of Electronic Filing

The following transaction was entered on 3/30/2018 at 10:03 AM EDT and filed on 3/28/2018

Case Name: Chef Geoff's et al v. The Virginia Alcoholic Beverage Control Authority et al

Case Number: [1:18-cv-00360-AJT-IDD](#)

Filer: Geoff Tracy
Chef Geoff's

Document Number: [1](#)

Docket Text:

COMPLAINT against Maria J.K. Everett, Travis Hill, Beth Hungate-Noland, Katie Kelly, Jeffrey Painter, Mark Rubin, The Virginia Alcoholic Beverage Control Authority, the Virginia Department of Alcoholic Beverage Control (Filing fee \$ 400, receipt number 0422-6011012.), filed by Geoff Tracy, Chef Geoff's. (Attachments: # (1) Civil Cover Sheet)(klau,)

1:18-cv-00360-AJT-IDD Notice has been electronically mailed to:

Thomas Arthur Berry tberry@pacificlegal.org, IncomingLit@pacificlegal.org

1:18-cv-00360-AJT-IDD Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

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Document description:Civil Cover Sheet

Original filename:n/a

Electronic document Stamp:

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