

**Chancery Court  
Loudon County, TN**

---

Little Italy of Tellico, LLC	)	
and Its Member	)	
	)	
Plaintiffs,	)	
	)	
vs	>	Case Number 13088
	)	
Loudon County Beer Board	)	
and Its members	)	
	)	
Defendants,	)	

---

**AMENDED COMPLAINT**

**NOW COMES** the Plaintiff by and through its attorney, Errol W. Keith averring:

1. Averments 1 through 18 in the original complaint dated May 24, 2023 are incorporated here in by reference.
2. Approximately one year after the Beer board denied Plaintiff a beer license, Plaintiff became aware that an influential member of the board was prejudice and had intend to block the granting of the license based on biase .
3. That individual had a personal grievance against the owner of the property where Plaintiff's business is located.
4. That individual is still active in Loudon city administration: is believed to be still hostile towards the property owner and is believed to hold sway over the beer board.
5. Due to that individual's prejudice Plaintiff was denied a fair hearing on is original petition for a beer license.

**REQUEST**

Plaintiff respectfully request the court to find:

- a. There are no programs being offered at the library for youth:

- b. Other than lectures there are no outside groups meeting at the library;
- e. The democratic age group being served are retired adults;
- d. The Tellico Village Library is not a public meeting place and **BOYD'S CREEK ENTERPRISES, LLC et al v. SEVIER COUNTY, TENNESSEE** , 362 S.W. 3d 600(2010) is not controlling;
- e. Provide a restraining order on further out side interference with the Beer Board;
- e. and order the Board to provide a rehearing of Plaintiff, application for a beer license in light of the misfeasance/malffeasance by a member sitting on the board approximately four years ago or in the alternative order a reconsideration of Plaintiff application without cost to the Plaintiff.

Dated July 21, 2023

Respectfully submitted



Errol W. Keith, Attorney for Plaintiff  
Bar Number # 024280  
200 Oologila Place  
Loudon, TN 3774  
(248) 808-2250

**Chancery Court  
Loudon County, TN**

---

Little Italy of Tellico, LLC	)	
and Its Member	)	
	)	
Plaintiffs,	)	
	)	
vs	)	Case Number 13088
	)	
Loudon County Beer Board	)	
and Its members	)	
	)	
Defendants,	)	

---

**PROOF OF SERVICE**

STATE OF TENNESSEE    )  
                                  ) SS.  
COUNTY OF LOUDON    )

On July 20, 2023 a true copy of the AMENDED COMPLAINT was served by first class mail postage fully prepaid on:

Andrew M. Tate, Esq.  
Kramer Rayson LLP  
Post Office Box 629  
Knoxville, TN 37901-0629



Errol W. Keith, Attorney for Plaintiff  
Bar Number # 024280  
200 Oologila Place  
Loudon, TN 3774  
(248) 808-2250