

REDACTED VERSION FOR DOCKET

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

Docket No. 217-2026-CV-00637

Seacoast Welcome Center, LLC
25 Springer Road, Hooksett NH 03106

v.

New Hampshire Liquor Commission
50 Storrs Street, Concord NH 03301

**VERIFIED PETITION FOR WRIT OF CERTIORARI (NEW
HAMPSHIRE LIQUOR COMMISSION) AND FOR EXPEDITED
INJUNCTIVE RELIEF**

Petitioner Seacoast Welcome Center, LLC, by its attorneys, Orr & Reno P.A.,
states as follows:

Introduction

Seacoast Welcome Center, LLC ("Seacoast") is seeking relief from this Court
through the issuance of a writ of certiorari and/or injunctive relief because the New
Hampshire Liquor Commission ("NHLC") [REDACTED]

[REDACTED]

The Petition is
being filed under seal (along with a redacted docket version) through a separate
Motion to Seal because it includes confidential business and financial information
and [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Parties

1. Seacoast is a New Hampshire limited liability company with a principal place of business at 25 Springer Road, Hooksett. It registered with the Secretary of State on January 15, 2026 under Business ID 1015634.

2. [REDACTED]

Bradley K. Pernaw is its Manager.

3. [REDACTED]

4. The NHLHC is a state agency with offices at 50 Storrs Street, Concord. It issued the RFQ/RFP and administers the procurement.

5. [REDACTED]

Jurisdiction and the Absence of an Adequate Alternative Remedy

REDACTED VERSION FOR DOCKET

6. This Petition for Writ of Certiorari is ripe at this time and certiorari is the proper vehicle for the relief being requested by Seacoast. *Petition of Dean*, 177 N.H. 607, 611; *Petition of Mason*, 177 N.H. 112, 119 (2024); *Runde v. City of Concord*, 128 N.H. 175, 177 (1986)

7.

8.

9. This Court has jurisdiction to issue the writ. *74 Cox Street, LLC v. City of Nashua*, 156 N.H. 228, 229 (2007); *Runde*, 128 N.H. at 177.

10.

11.

12.

13.

Timeliness

14.

Immediate Threat of Irreparable Harm

15.

16.

Statement of Facts

17.

18.

19.

REDACTED VERSION FOR DOCKET

21.

22.

23.

24.

25.

REDACTED VERSION FOR DOCKET

26.

27.

28.

29.

30.

S

[illegible]

[illegible]

[REDACTED]

[REDACTED]

[illegible]

[REDACTED]

[REDACTED]

[illegible]

REDACTED VERSION FOR DOCKET

A black and white photograph of a person's face, heavily obscured by thick, horizontal black bars. The bars are of varying lengths and positions, creating a fragmented and abstract visual. The person's features are mostly hidden, with only some highlights and shadows visible through the gaps. The overall effect is one of mystery and artistic abstraction.

This image shows a solid black rectangular area. There are several thin, parallel white horizontal lines visible across the frame, which appear to be artifacts from a scanning process or digital noise. The lines vary slightly in brightness and position.

The image consists of a single, uniform black rectangle covering the entire area. There are no discernible features, text, or patterns.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

A black and white photograph of a person's face, heavily obscured by thick, horizontal black bars. The person's eyes, nose, and mouth are visible through the gaps between the bars. The background is dark and indistinct.

[REDACTED]

A black and white photograph of a person's face, heavily obscured by thick black horizontal bars. The bars are of varying thickness and are positioned across the face, leaving only some features like the eyes and mouth partially visible. The background is dark and textured.

[illegible]

[REDACTED]

[REDACTED]

Standard of Review

111. On certiorari the Court examines whether the agency acted illegally with respect to jurisdiction, authority or observance of the law, or unsustainably exercised its discretion or acted arbitrarily, unreasonably or capriciously. *Petition of Dean*, 177 N.H. 607, 611 (2025).

112.

[REDACTED]

113.

[REDACTED]

114.

[REDACTED]

[REDACTED]

115. On certiorari the Court reviews the entire record and may hear evidence as to what was done below and whether justice requires a different result. Gordon J. MacDonald, *Wiebusch on New Hampshire Civil Practice and Procedure* § 38.09 (4th ed. Matthew Bender & Co.) (citing *Dinsmore v. City of Manchester*, 76 N.H. 187 (1911); *Broderick v. Hunt*, 77 N.H. 139 (1913)).

Count I – Petition for Writ of Certiorari

[REDACTED]

[REDACTED]

[REDACTED]

Count II - Petition for Writ of Certiorari

[REDACTED]

[REDACTED]

[illegible]

	[REDACTED]
--	------------

[illegible]

[illegible]

[REDACTED]

[REDACTED]

Count V - Petition for Writ of Certiorari

[REDACTED]

[REDACTED]

Count VI - Petition for Writ of Certiorari

[REDACTED]

[REDACTED]

Count VII – Petition for Writ of Certiorari

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

REDACTED VERSION FOR DOCKET

Count VIII- Petition for Writ of Certiorari

[REDACTED]

[REDACTED]

Count IX - Petition for Writ of Certiorari

[REDACTED]

[REDACTED]

Substantial Injustice

187. Seacoast repeats and realleges each preceding paragraph as if fully set forth herein.

188. Relief on certiorari is granted as a matter of discretion governed by the justice of the case, and the petitioner must show not merely error but that injustice resulted. *Dinsmore v. City of Manchester*, 76 N.H. 187, 191 (1911); *accord* *Petition of Dean*, 177 N.H. at 611.

[REDACTED]

[REDACTED]

Count X - Injunctive Relief [REDACTED]

193. Seacoast repeats and realleges each preceding paragraph as if fully set forth herein.

194. A reviewing court has the equitable power to [REDACTED]

[REDACTED].

[REDACTED]

Count XI - Declaratory Relief

[REDACTED]

Count XII – Injunctive Relief

[REDACTED]

Relief Requested

WHEREFORE, Seacoast Welcome Center, LLC requests that the Court:

A. Issue a writ of certiorari that

[REDACTED];

B. Alternatively, issue a writ of certiorari

[REDACTED];

C. Order the NHLHC to

[REDACTED];

D. Enjoin the NHLHC,

[REDACTED];

E. In the alternative, and only if the relief requested in paragraphs A through B cannot be afforded, [REDACTED];

F. Award Seacoast its costs; and

G. Grant such other relief as is just and reasonable.

CONFIDENTIAL – FILED UNDER SEAL

Respectfully submitted,

Seacoast Welcome Center, LLC

By its Attorneys,

Dated: August 14, 2026

By: /s/ Lisa Snow Wade

Lisa Snow Wade N.H. Bar #5595
lwade@orr-reno.com
Jeffrey C. Spear N.H. Bar #14938
jspear@orr-reno.com
Orr & Reno, PA
45 S. Main Street, P.O. Box 3550
Concord, New Hampshire, 03302
(603) 224-2381

Verification

Bradley K. Pernaw hereby confirms under pains and penalties of perjury that: I am the Manager of Seacoast Welcome Center, LLC and am authorized to make this verification on its behalf. I have read the foregoing Verified Petition. The allegations of fact are based on my own knowledge and true, except as to those matters alleged on information and belief, and as to those I believe them to be true.

Signed by:

A handwritten signature in black ink that reads "Brad Pernaw". The signature is written in a cursive style with a large 'B' and 'P'.

E052EE872247449

Bradley K. Pernaw, Manager, Seacoast Welcome Center, LLC

Exhibits

1 –

2 –

2-1 –

2-2 –

2-3 –

3 –

4 –

5 –

6 –

[ALL EXHIBITS FILED UNDER SEAL]