WEST ALLIS COMMON COUNCIL PUBLIC SAFETY COMMITTEE CITY OF WEST ALLIS

In the Matter of the	,
Complaint Against	

SUMMONS

STEFFEK LLC D/B/A The Drunk Uncle

Premises Location: 1902 S. 68th Street West Allis, WI 53219

Agent: Neal Steffek

STATE OF WISCONSIN) ss. COUNTY OF MILWAUKEE)

THE WEST ALLIS COMMON COUNCIL TO STEFFEK LLC by licensing agent Neal Steffek:

You are hereby notified that a sworn complaint, a copy of which is attached, has been duly made and filed, requesting a hearing on suspension, revocation, or non-renewal of the 2024-2025 Class "B" fermented malt beverage license and a "Class B" intoxicating liquor license (together identified locally as a "Class B Tavern License") and a Public Entertainment Permit, issued collectively under license number ALC-22-130, for the premises located at 1902 S. 68th Street, in the City of West Allis, State of Wisconsin, for the license period running July 1, 2024, and expiring on June 30, 2025. This sworn complaint requesting a hearing for the suspension, revocation, or non-renewal of the above referenced licenses or permits is brought pursuant to the provision of Wis. Stat. §§ 125.12(1), 125.12(2), 125.12(3) and West Allis Code §§ 9.51, 9.60(5), and 9.67(5).

NOW THEREFORE, you, STEFFEK LLC by licensing agent Neal Steffek, are hereby summoned to appear before the Public Safety Committee of the West Allis Common Council on Thursday, April 3, 2025, at 5:00 p.m., or as soon thereafter as the matter may be called, in Room 128, of the West Allis City Hall located at 7525 W. Greenfield Avenue in the City of West Allis, or as soon thereafter as this matter can be heard, to admit or deny the allegations in the complaint. You may be represented by counsel on this date.

In the case of your failure to appear as required by this summons, the allegations in the complaint against you shall be taken as true and, if the Public Safety Committee of the West Allis Common Council finds the allegations sufficient, a recommendation that your license(s) be suspended, revoked, or non-renewed will be made to the full Common Council. The Common Council may then vote to suspend, revoke, or non-renew your license(s).

You are further notified that if you appear as required by this summons and contest the allegations in the complaint, a hearing will be scheduled at a later date before the Public Safety Committee, at which time you may be represented by counsel if you so choose, cross examine the witnesses who testify adversely against you, and present witnesses in your own behalf. A written transcript of said hearing shall be made and you may obtain a copy of the transcript of this proceeding at your expense.

Dated at West Allis, Wisconsin, this 24th day of March, 2025.

WEST ALLIS COMMON COUNCIL

By: Tracey Utke
Tracey Utke
West Allis City Clerk

WEST ALLIS COMMON COUNCIL PUBLIC SAFETY COMMITTEE CITY OF WEST ALLIS

In the Matter of the Complaint Against	COMPLAINT
STEFFEK LLC D/B/A The Drunk Uncle	
Premises Location:	
1902 S. 68th Street	
West Allis, WI 53219	
Agent: Neal Steffek	
STATE OF WISCONSIN)
) ss.
COUNTY OF MILWAUKEE)

Officer Carrie Novinska of the West Allis Police Department, being duly sworn on oath, deposes and states as a complaint under Wis. Stat. § 125.12(2)(ag) against STEFFEK LLC, doing business as "The Drunk Uncle" as follows:

1. That this complaint is based upon information contained within official records maintained by the City of West Allis, West Allis Police Department, and the Wisconsin Department of Revenue which the complainant has used in the past and found to be reliable.

I. PARTIES, LICENSE, AND PERMIT INFORMATION

- 2. That the complainant is a resident of the City of West Allis.
- 3. That STEFFEK LLC, doing business as "The Drunk Uncle" has been issue a Class "B" fermented malt beverage license and a "Class B" intoxicating liquor license (together identified locally as a "Class B Tavern License") and a Public Entertainment Permit, issued collectively under license number ALC-22-130 for the premises located at 1902 S. 68th Street in

the City of West Allis, State of Wisconsin, for the licensed period running July 1, 2024 to June 30, 2025.

- 4. That license ALC-22-130 identifies Neal Steffek as the licensing agent appointed pursuant to Wis. Stat. § 125.04(6)(a).
- 5. That Neal Steffek has operated an alcohol establishment at the premises located at 1902 S. 68th Street since 2014. This location previously did business under the trade name "Mugshots" until changed by Neal Steffek on or about May 20, 2014, to "The Drunk Uncle."
- 6. That according to Department of Revenue Agent Merlena Hoefs and Agent Ashley Schnering, the Wisconsin Seller's Permit for STEFFEK LLC was revoked on or about July 18, 2024, and has not been reissued or reinstated as of the date of this complaint.

II. FACTUAL BASIS

- 7. That on or about March 8, 2025, a review was posted online by an individual identified in this complaint as B.D., regarding her experiences at "The Drunk Uncle." Hereafter this original review will be identified as the "Original Complaint by B.D." This review identified inappropriate behavior by the owner of the establishment towards a female friend of hers, including allegations of overservice and harassment. The Original Complaint by B.D. further identified that the bartender touched her (B.D.'s) face and requested that B.D. "make him a sandwich for International Women's Day."
- 8. In response to the Original Complaint by B.D., the official page for "The Drunk Uncle," stated, "You are a fat nerd with no friends. That girl was hot AF for this giant huge snake. Go home and jerk it dork." The complainant states that based on information and belief, the official page for "The Drunk Uncle" is controlled by Neal Steffek. These comments were all made in a public forum and drew attention from the general public.

- 9. That in response to the Original Complaint by B.D., the City of West Allis posted a public message inviting individuals to report similar behavior or harassment by bars or establishments. In response to the City's request for information, Neal Steffek, agent for "The Drunk Uncle," publicly posted that the huge snake referenced in the earlier post by "The Drunk Uncle" should be the "new city mascot!"
- 10. That based upon the Original Complaint by B.D. and the invitation from West Allis for additional information, the City was able to identify additional complaints against STEFFEK LLC, doing business as "The Drunk Uncle" and the owner/agent Neal Steffek. Those investigated complaints are as follows:

Count 1 and 2: Disorderly or Riotous, Indecent or Improper House

Allis Police Department obtained a complaint from an individual identified in this complaint as L.E. This complaint identified that on or about March 30, 2024, L.E. was at "The Drunk Uncle" and observed the owner, Neal Steffek, tending the bar at "The Drunk Uncle." L.E. reported that he observed Neal Steffek to be intoxicated to the point that he apparently had difficulty standing upright. L.E. reported that Neal Steffek begin speaking to an unknown female party. L.E. observed Neal Steffek pulled the front of his own shirt up, exposing his chest to this female, and then directed this female patron that it was her turn to expose herself. L.E. observed and overheard Neal Steffek make several inappropriate sexual comments to this female about exposing herself. L.E. observed Neal Steffek take the female's wrist and attempt to lead her behind the bar while the female resisted and declined the offer. Neal Steffek was also observed pouring himself and the unknown female large shots of alcohol and then attempting to get her to

¹ This female party remained unidentified to the City or law enforcement until after the Original Complaint by B.D. was posted and gained public attention.

take the shot. L.E. reported that he observed the female appear uncomfortable and decided to approach with his friends to diffuse the situation by distracting Neal Steffek. L.E. reported that around this time, an unknown male party that was associated with this female came back from the bathroom and the female became upset when describing her interactions with Neal Steffek to this male. This unknown male demanded an apology from Neal Steffek. L.E. reported that Neal Steffek began to argue back, started recording the group accusing them of lying about the interaction, and calling them "woke." Eventually L.E. reported that Neal Steffek became aggressive and behaved threateningly before yelling "Leave a review I don't care Ive had this bar for 11 years no one will take it from me." [sic].

12. That after the Original Complaint by B.D., additional victims of harassment came forward. One individual that came forward, identified in this complaint as A.V, was the female individual referenced in paragraph 11 by L.E. A.V. reported to the police that on or about March 30, 2024, she went to "The Drunk Uncle" with her husband. A.V. reported that she had been to the bar before and was familiar with the owner, whom she identified as "Neal." A.V. reported that she had been at the bar for approximately 30 minutes when her husband went to the bathroom. A.V. stated that "Neal" was heavily intoxicated and "could not stand straight up." A.V. reported that "Neal" approached her when she was alone and he lifted up his shirt exposing his chest, and then stated that it was her turn. A.V. reported that Neal made this request approximately 5 times, making her feel uncomfortable. A.V. reported that around this time a group of three males saw what was happening and approached the interaction. This group include L.E. identified in paragraph 11. A.V. reported that Neal Steffek then took her wrist and stated, "come here, I need to tell you something." A.V. reported feeling vulnerable and upset by this interaction. A.V. reported that Neal Steffek proceeded to pour two large shots and tried to

get A.V. to drink one, which she declined multiple times. A.V. reported that this apparently made Neal Steffek angry. A.V. reported that shortly thereafter, her husband returned from the bathroom and found her upset. A.V. reported that she began to cry, briefly explained the incident, and went to the bathroom to compose herself. A.V. reported that her husband began demanding an apology from Neal, which Neal refused to provide. She stated she became concerned there was going to be a fight so she and her husband left the bar and Neal began to follow them out and continued to harass them and cause a disturbance. A.V. reported that she did not originally report this information because she was concerned about retaliation.

Count 3 and 4: Disorderly or Riotous, Indecent or Improper House

had contact with an individual identified in this complaint by B.D., the West Allis Police also had contact with an individual identified in this complaint as D.C. regarding her interactions at "The Drunk Uncle." D.C. reported that on May 26, 2024, she had gone to "The Drunk Uncle" with a group of friends. D.C. reported that she was sober at the time and had only been at the bar for 20-25 minutes when she decided to take a cigarette break outside with her female friend, identified in this complaint as M.C. As she exited the bar, D.C. reported that she observed a man in a colorful outfit near the front door of the establishment. This male was staggering and "noticeably very intoxicated." D.C. reported that this male eventually approached her and M.C. while identifying himself as the owner of "The Drunk Uncle." Without provocation, this man, identified by D.C. as Neal Steffek, began to berate her and M.C. by calling the females "white trash," "bitches," and "sluts." D.C. reported that Neal Steffek became increasingly agitated which caused the two women to move further away from the bar out of concern and fear of Neal Steffek's behavior. D.C. reported that based on this threatening behavior by Neal Steffek, she decided to collect the rest of her group and have them all leave the bar. She attempted to enter

the establishment but was blocked at the door by Neal Steffek who called the women "white trash bitches" and then proceeded to threaten to shoot and kill the women. D.C. reported that while Neal Steffek was stumbling and slurring his speech, he told her "I've been killing for 20 years, I've killed plenty of pieces of shit like you before." He then referenced a gun he owned and began to reach towards his waistband. Feeling immediately threatened, D.C. reports she left the area and went back to her vehicle to call her friends and call the police. Police were able to confirm that this call from D.C. to the police occurred, and reported it as call #24-020743. The call identifies a complaint that "the owner of the bar came outside and threatened to shoot them; happened at drunk uncle." [sic.]

14. That based on this Original Complaint by D.C. police followed up with the female friend that was with D.C. at the time, identified for the purposes of this complaint as M.C. Police stated that M.C. reported that she had gone outside with D.C. to have a cigarette and that a male party called them "white trash." M.C. reported that she and D.C. attempted to re-enter the bar to get their friends but were stopped at the door by this same male who threatened to pull out a gun and that he had "killed" plenty of people. M.C. described the male making the statements and threats as being a "white male" with a "beard", "belligerent, and was 'not dressed very nice".

M.C. reported that this incident made her feel very unsafe and uncomfortable.

Count 5: Disorderly or Riotous, Indecent or Improper House

15. That after the Original Complaint by B.D., police were also in contact with an individual identified in this complaint as S.S. This individual reported that her experiences with Neal Steffek and "The Drunk Uncle" began in 2014 and ended in 2018. S.S. reported that she was in her mid-20s at the time and knew Neal Steffek from being a patron at the bar. S.S. reported that approximately 10 times when she was at "The Drunk Uncle," Neal Steffek would

greet her by lifting up his shirt exposing his chest and then would tell her that it was her turn.

S.S. stated that she felt this behavior was disgusting and felt violated. S.S. stated that she did tell

Neal Steffek to stop that behavior as it was "not funny." She reported that Neal Steffek persisted
to engage in the behavior and request she expose herself to him and the bar several more times
resulting in her feeling uncomfortable, violated, and eventually causing her to stop going to "The

Drunk Uncle" all together. S.S. did not immediately report these behaviors due to fear of
retaliation.

Count 6: Violation of Chpt. 125

Police Officer Mussatti conducted a routine tavern check at "The Drunk Uncle" located at 1902 S. 68th Street in West Allis. Officer Mussatti reported that he observed approximately 20 patrons in the bar, most of which had apparent alcoholic beverages. Officer Mussatti made contact with two female bartenders who had been serving the alcohol and confirmed that neither bartender had a valid operator's license to tend the bar, as required by law. Officer Mussatti required that the bar stop serving alcohol at that time and had staff contact the owner/agent Neal Steffek.

Officer Mussatti reported that eventually Neal Steffek came to the bar and he was advised that he needed to be at the business to supervise any unlicensed bartenders. Due to the Seller's Permit issue identified in Count 7 of this complaint, Officer Mussatti asked what LLC "The Drunk Uncle" was operating under. Neal Steffek reported that he was currently operating under

Count 7: Continuing Violation of Law related to Operation Without Seller's Permit:

17. That the renewal Tavern License for STEFFEK LLC, identified in this complaint as ALC-22-130, was granted by the West Allis Common Council and issued to begin the license

period on July 1, 2024. That, as identified in paragraph 6 of this complaint, the Wisconsin Department of Revenue has informed the City of West Allis that the Seller's Permit for STEFFEK LLC was revoked or suspended on or about July 18, 2024, approximately 18 days after the renewal licensed was granted by the City of West Allis.

- 18. That, at all times after July 18, 2024, the date when the DOR revoked or suspended the Seller's Permit for STEFFEK LLC, any sales of any goods by STEFFEK LLC were in violation of Wis. Stat. § 77.52(12), which identifies that "a person who operates as a seller in this state without a permit or after a permit has been suspended or expired..." "is guilty of a misdemeanor." See Wis. Stat. Sec. 77.52(12).
- 19. That the West Allis Police Department has conducted tavern checks and other investigations at the "The Drunk Uncle," and confirmed that the establishment was operating and selling alcohol and/or other items on at least the following dates:
 - a. 8/17/2024
 - b. 9/14/24
 - c. 10/6/2024
 - d. 11/2/2024
 - e. 11/22/24
 - f. 12/8/2024

III. VIOLATIONS OF STATE LAW AND LOCAL CODE: REVOCATION OR SUSPENSION

A. Alcohol Licensure

The Class "B" fermented malt beverage license and "Class B" intoxicating liquor license (together identified locally as a "Class B Tavern License") under license number ALC-22-130 issued to STEFFEK LLC, doing business as "The Drunk Uncle," located at 1902 S 68th Street, West Allis, Wisconsin, and issued for the license period running July 1,

- 2024 to June 30, 2025 is subject to suspension or revocation pursuant to Wis. Stat. § 125.12(2)(ag) and West Allis Municipal Code § 9.51 for the following violations:
- 2. Violation of Wis. Stat. § 125.12(2)(ag)2 because Neal Steffek, agent and owner of STEFFEK LLC, doing business as "The Drunk Uncle" keeps or maintains the establishment as a disorderly or riotous, indecent or improper house by engaging in repeated acts of sexual harassment, verbal harassment, and threatening behavior while at the establishment as alleged in Counts 1, 2, 3, 4, and 5 of this complaint.
- 3. Violation of Wis. Stat. § 125.12(2)(ag)3 because Neal Steffek, agent and owner of STEFFEK LLC, doing business as "The Drunk Uncle" has knowingly sold or given away alcoholic beverages to known habitual drunkards, specifically himself, Neal Steffek, as alleged in Counts 1, 2, 3, and 4 of this complaint.
- 4. Violation of Wis. Stat. § 125.12(2)(ag)1 because Neal Steffek, agent and owner of STEFFEK LLC, doing business as "The Drunk Uncle" has violated the requirements of Chpt. 125 related to ensuring that the premise has a licensed operator or is otherwise in compliance with Wis. Stat. §§ 125.32(2) and 125.68(2) as alleged in Count 6 of the complaint.
- 5. Violation of Wis. Stat. §125.12(2)(ag)4 because STEFFEK LLC, by agent Neal Steffek, does not hold the necessary qualifications required under this chapter to hold a license. Specifically, Neal Steffek is a habitual law offender pursuant to Wis. Stat. § 125.04(5)(b) for continuing to sell alcohol and other taxable goods without a valid Wisconsin Seller's Permit every day that "The Drunk Uncle" has operated since July 18, 2024, in violation of Wis. Stat. § 77.52(12) as alleged in Count 7 of the complaint.
- B. Public Entertainment License

- 1. The Public Entertainment License number ALC-22-130 issued to STEFFEK LLC, doing business as "The Drunk Uncle" for the premises located at 1902 S 68th Street, West Allis, Wisconsin, for the license period running July 1, 2024 to June 30, 2025, issued pursuant to West Allis Municipal Code § 9.76 is subject to suspension or revocation for the following violations:
- 2. Violation of West Allis Municipal Code § 9.51(1)b. because STEFFEK LLC, by agent Neal Steffek, has failed to maintain order on the premises as alleged in Counts 1, 2, 3, 4, 5, 6, and 7, because he facilitates and creates harassing behavior, threatening behavior, disorderly behavior, and unlawful activities at the premises.
- 3. Violation of West Allis Municipal Code §9.51(1)d. because STEFFEK LLC, by licensing agent Neal Steffek, has conducted activities on the premises that have caused a public nuisance as alleged in Counts 1, 2, 3, 4, 5, 6, and 7, because he has engaged in the sale of liquor without a Seller's Permit, has continuously and regularly violated city ordinances, has promoted a premises for illegal drinking or consumption of alcohol, and has engaged in or has allowed the licensee to engage in disorderly conduct or acts of harassment.

IV. VIOLATIONS OF STATE LAW AND LOCAL CODE: NON-RENEWAL

A. Alcohol License

 The Class "B" fermented malt beverage license and "Class B" intoxicating liquor license (together identified locally as a "Class B Tavern License") issued under license number ALC-22-130 issued to STEFFEK LLC, doing business as "The Drunk Uncle" for the premises located at 1902 S 68th Street, West Allis, Wisconsin, for the license period running July 1, 2024 to June 30, 2025 is subject to non-renewal pursuant to Wis. Stat. § 125.12(3) for the following violations:

2. Violation of Wis. Stat. § 125.12(2)(ag)4. because STEFFEK LLC, by licensing agent Neal Steffek, no longer possesses the qualifications required under Wis. Chpt. 125 to hold a license, specific to his Seller's Permit suspension or revocation, Wis. Stat. § 125.04(5)(a)4, and Habitual Law Offender status, Wis. Stat. § 125.04(5)(b).

WHEREFORE, the complainant requests that the licensee named herein, STEFFEK LLC, by licensing agent Neal Steffek, be summoned to appear before the Public Safety Committee of the West Allis Common Council to answer this complaint, and, if the material allegations in the complaint are denied, that a hearing be held to determine whether the licenses and/or permits issued to STEFFEK LLC and held under ALC-22-130 should be revoked or suspended.

Dated this <u>24</u> day of <u>March</u>, 2025.

Subscribed and sworn to before me this 24 day of March

Christopher

(No. 1)

(Name)

Notary Public, State of Wisconsin My Commission expires: 3/13/2028