

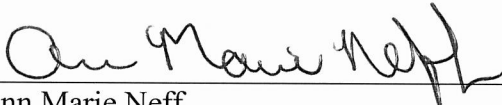


In the case of your failure to appear as required by this summons, the allegations in the complaint against you shall be taken as true and, if the License and Health Committee of the West Allis Common Council finds the allegations sufficient, a recommendation that your license(s) be suspended or revoked will be made to the full Common Council. The Common Council may then vote to suspend, revoke, or not 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 License and Health Committee, at which time you may be represented by counsel, 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 26<sup>th</sup> Day of July, 2019.

WEST ALLIS COMMON COUNCIL

By:   
Ann Marie Neff  
Deputy City Clerk



beverage license, identified as 18-1541, for the premises located at 1901 S. 60<sup>th</sup> Street in the City of West Allis, Wisconsin; and doing business under the trade name, “Las Palmas.”

5. That “Las Palmas” has an alternative address listed as 6007 W. Burnham Street, in the City of West Allis, Wisconsin, however that the premises location remains the same. The applications for license and WAPD records show both addresses have been used interchangeably.
6. That Hugo Juarez is listed as the agent for ARH Enterprises LLC on both the 2018 through 2019 license and the 2019 through 2020 license.
7. That official WAPD records indicate that on September 2, 2018, West Allis Police Officer Brett Vanden Boogard conducted a tavern check at “Las Palmas.” Officer Vanden Boogard reported that the front doors of the establishment were open and the music was very loud and could be heard down the street. The establishment was warned about the noise and turned down the volume.
8. That official WAPD records indicate that on September 6, 2018, the West Allis Police Department conducted a “Tavern Compliance Check” at “Las Palmas” referenced above. Officer Alexander Iskandarani and Officer Kevyn Mussatti entered the premises followed shortly thereafter by Community Service Officer Abbey Bailey (hereafter “CSO Bailey”) who at the time was twenty (20) years old (D.O.B. 12/10/1997). CSO Bailey ordered a Corona beer with a lime and was served the beverage by bartender Rocio Castro without being requested identification or verifying that CSO Bailey had attained the legal drinking age of 21.

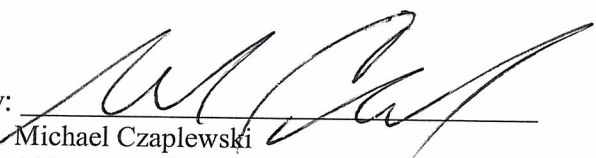
9. That official WAPD records indicate that on September 21, 2018, officers were dispatched to “Las Palmas” regarding a fight taking place in front of the establishment. Officer Michael Lazaris spoke with bartender Rocio Castro who admitted to serving alcohol to the parties involved in the fight in front of “Las Palmas.” Officer Erin Luedke reported that she spoke with Omar Ojeda, (D.O.B. 10/24/1998), one of the subjects involved in the fight. Officer Luedke observed a strong odor of intoxicants emanating from Omar Ojeda and confirmed he was served alcohol while under the age of 21 while he was at Las Palmas by bartender Rocio Castro. Officer’s confirmed that Omar Ojeda had provided false information to Rocio Castro in order to obtain alcohol. Bartender Rocio Castro was not issued a ticket. Officers confirmed that both subjects involved in the fight and served alcohol at Las Palmas were intoxicated.
10. That official WAPD records indicate that on April 17, 2019, the West Allis Police Department conducted a “Tavern Compliance Check” at “Las Palmas.” Officer Adam Niemuth reported that he was working with Community Service Officer Andrew Lamm (hereafter “CSO Lamm) on the operation. CSO Lamm was twenty (20) years old at the time (D.O.B. 06/09/1998). Officer Niemuth reported that he entered “Las Palmas” and observed as CSO Lamm enter separately from the officers. CSO Lamm ordered a Corona beer. Officer Niemuth reported that the bartender, Stephanie Mendez Castro served CSO Lamm the beer without asking for or verifying CSO Lamm’s age.
11. That based on the incidents referenced in this complaint, ARH Enterprises LLC, dba “Las Palmas” has violated West Allis Revised Municipal Code (hereafter “WA

RMC”) Section 9.02 (20)(a)3 and 4 and Wis. Stat. 125.07(2)(a)2 for serving intoxicated persons; WA RMC Sec. 9.02(20)(a)6 and Wis. Stat. 125.12(2)(ag)2 for maintaining a disorderly or riotous, indecent, or improper house due to loud, raucous noise and disorderly conduct incidents; and Wis. Stat. 125.07(1)(a)1 and 2, Wis. Stat. 125.12(1)(b) 1 and 2 for serving alcoholic beverages to an underage person at least two times within a one year period.

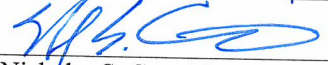
12. That the preceding violations substantially relate to the licensed activity and are grounds for suspension or revocation of the 2019-2020 Class B intoxicating liquor and fermented malt beverage license, number 19-1541, issued to ARH Enterprises LLC.

**WHEREFORE**, Alderperson Michael Czaplewski requests that ARH Enterprises LLC, by agent Hugo Juarez, be summoned to appear before the License and Health Committee of the West Allis Common Council to answer this complaint and, if the material allegations of the complaint are denied, that a hearing be held to determine whether the permits and licenses possessed by ARH Enterprises LLC, by agent Hugo Juarez, should be revoked or suspended.

Dated this 26 day of July, 2019.

By:   
Michael Czaplewski  
Alderperson for the First District  
License and Health Committee Chair  
City of West Allis

Subscribed and sworn to before me  
this 26 day of July, 2019.

  
(Nicholas S. Cerwin)  
Notary Public, State of Wisconsin  
My Commission expires: Permanent

