## WEST ALLIS COMMON COUNCIL PUBLIC SAFETY COMMITTEE CITY OF WEST ALLIS

In	the	Matt	er	of	the
Cc	mp	laint	A	gai	nst

COMPLAINT

D&G Investments LLC D/B/A Mobile Estates of West Allis

Premises Location: 10401 W. Greenfield Avenue West Allis, WI 53214

License Agent: Thaddeus J. Derynda

STATE OF WISCONSIN	)
	) ss
COUNTY OF MILWAUKEE	)

## NOTICE OF SUPSENSION OR REVOCATION OF THE MANUFACTURED AND MOBILE HOME COMMUNITY LICENSE

Building Inspector Daniel Adamczyk of the West Allis Code Enforcement

Department, being duly sworn on oath, deposes and states as a complaint under Wis.

Stat. § 66.0435(2)(d) and West Allis Municipal Code 9.73(5) against D&G Investments

LLC doing business as "Mobile Estates of West Allis" as follows:

- That the complainant, Daniel Adamczyk, is employed by the City of West Allis as a building inspector and code enforcement officer supervisor.
- 2. That this complaint is based upon direct observations, complaints, and information contained within official records maintained by the City of West Allis and the West Allis Code Enforcement Department that the complainant has used in the past and found to be reliable.

- 3. That D&G Investments LLC, d/b/a Mobile Estates of West Allis, by agent Thaddeus J. Derynda, currently holds a Manufactured & Mobile Home Community License under license number MHC-22-2 for the license period running July 1, 2023, to June 30, 2024 for forty-nine (49) Manufactured or Mobile home spaces at the premises identified as 10401 W. Greenfield Avenue, West Allis, WI 53214. This exact location was also licensed for the 2022-2023 license period by the same owner and entity.
- 4. That this location is more accurately described under parcel number 449-9992-000 as 10401 -10407 W. Greenfield Avenue in the City of West Allis.
- 5. That based on information and belief, the property is identified under parcel number 449-9992-000 is owned by Thaddeus J. Derynda.
- 6. That said property subject to license MHC-22-2 located at 10401 -10407 W. Greenfield Avenue in the City if West Allis is currently OR has been within the last six months, in violation of the following code sections:
  - A. Violations of West Allis Municipal Code §§ 9.73(4)c.ii. and 9.73(4)c.v. based upon information that West Allis Police have been dispatched to the trailer park 36 times since March 1, 2023. Many of those calls relate to break-ins for the abandoned trailers, drug and alcohol abuse issues, fights, thefts, loitering, and general disorderly or disruptive behavior. The underlying conditions of the property and lack of control and maintenance are a root cause of the frequency of the calls for service.
  - B. Violation of West Allis Municipal Code § 9.73(4)c.ii., based upon the complainant's observations that approximately 29 of the possible 49 living units or spaces have vacant trailers with deteriorating, unmaintained, and

otherwise blighted manufactured mobile homes on the property. The violations range from broken windows, active rodent infestations, and broken or leaking structures. This creates a public nuisance in that they represent rodent harborages, attractive nuisances for children, or places that may otherwise be used for illegal activities.

- C. Violations of West Allis Municipal Code §§ 9.73(4)c.ii. and 9.73(4)c.vi., because 2-3 manufactured mobile homes at the property have apparent illegal additions to the mobile home which are not up to code and have been added without consideration of safety requirements.
- D. Violation of West Allis Municipal Code § 9.73(4)c.ii. because there are several dead trees throughout the property that are a current threat to the health and safety of those entering or occupying the premises.
- E. Violation of West Allis Municipal Code §9.73(4)c.vi based upon the complainant's observations that the roads and other infrastructure of the park is in significant disrepair and create a blight on the community. This is a violation of West Allis Municipal Code.
- F. Violation of West Allis Municipal Code § 9.73(4)c.vi. based upon the sewer system regularly backing up causing excessive wastewater to accumulate and unsafe conditions for residents and the community.
- 7. That based upon the aforementioned violations of West Allis Municipal Codes and pursuant to West Allis Municipal Code § 9.73(5) and Wis. Stat. § 66.0435(2)(d), the Manufactured and Mobile Home Community License identified as MHC-22-2 issued

to D&G Investments LLC doing business as "Mobile Estates of West Allis, by Agent Thaddeus J. Derynda is subject to, suspension, or revocation.

WHEREFORE, Building Inspector Daniel Adamczyk requests that the licensees named herein, D&G Investments LLC doing business as "Mobile Estates of West Allis, by Agent Thaddeus J. Derynda, be summoned to appear before the Public Safety 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 West Allis Manufactured and Mobile Home Community License should be suspended, revoked, and/or non-renewed.

Dated this \_\_\_\_\_ day of \_\_\_\_\_\_, 2023.

By: Day In

Print Name: Daniel R Adamczyk

Code Enforcement Department

Subscribed and sworn to before me

oday of :

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

4