

**WEST ALLIS COMMON COUNCIL  
LICENSE AND HEALTH COMMITTEE  
CITY OF WEST ALLIS**

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**In the Matter of the  
Complaint Against**

**COMPLAINT**

**Kamal Issa,  
d/b/a West Allis Cigarette Depot,**

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**STATE OF WISCONSIN        )  
  ) ss.  
COUNTY OF MILWAUKEE )**

Michael J. Czaplewski, being duly sworn, on oath deposes and states as a complaint against Kamal Issa, d/b/a West Allis Cigarette Depot, as follows:

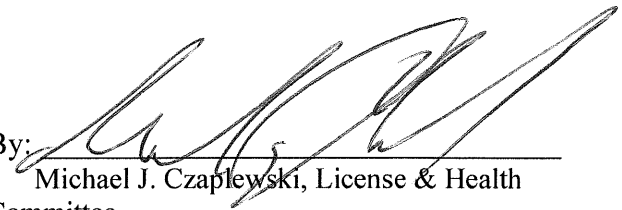
1. That the complainant is a resident of the City of West Allis, is the duly elected Alderperson for the First Aldermanic District in the City of West Allis, is Chairperson of the License and Health Committee, and makes this complaint at the direction of the License and Health Committee of the West Allis Common Council.
2. That the information contained in this complaint comes from the complainant's review of official records maintained by the City of West Allis and the West Allis Police Department, which records complainant believes to be reliable and accurate.
3. That Kamal Issa, d/b/a West Allis Cigarette Depot, is the holder of a Cigarette and Tobacco Product License under License No. 513, issued by the West Allis Common Council for the license period beginning July 1, 2009, and ending June 30, 2010, for the premises located at 7023 West Greenfield Avenue, West Allis, Wisconsin, and does business under the trade name "West Allis Cigarette Depot."
4. That on December 2, 2009, a juvenile named R.W. stole bus tickets from Dotke Alternative High School.

5. That later that day, R.W. went to the Cigarette Depot and sold the bus tickets for \$200 to Kamal Issa and Mousa Salem. R.W. stated that Salem told him that he would give him a good price if he brings in any other merchandise.
6. That on December 3, 2009, R.W. confessed to stealing the bus tickets to his principal, Guy Powell, and Powell called the West Allis Police Department to investigate the incident.
7. That later on December 3, 2009, at approximately 4:30 p.m., R.W. returned to the West Allis Cigarette Depot and told Salem that he stole the bus passes and needed to buy them back.
8. That Salem told R.W. that he wanted \$250 for the passes so that he could make a profit.
9. That only after R.W. told him the police were involved, did Salem agree to sell the tickets back to R.W. for \$200. Since R.W. did not have the full \$200 at the time, he told Salem and Issa that he would return later that evening.
10. That on December 3, 2009, at approximately 5:00 p.m., West Allis Police Detectives Mark Rumler and Donald Krueger spoke to Salem and Issa, who stated that they had not and would not purchase any bus passes from anyone other than an official representative of the Milwaukee County Transit System. They denied purchasing any tickets from someone who came in from the street to sell them.
11. That on December 3, 2009, at approximately 6:15 p.m., R.W. and his father went to the West Allis Cigarette Depot with \$200 to buy back the bus tickets. When R.W. asked about the tickets, Salem initially denied knowing about the tickets, but eventually agreed to give them back to R.W. Further, he told R.W. and his father that the police had come earlier that day to the store, but that he had told the police that he did not purchase the bus tickets in question.


12. That upon returning the tickets to R.W., Salem asked him why he had called the police when he (Salem) had helped him (R.W.) by purchasing the stolen tickets.
13. That on December 8, 2009, West Allis Police officers arrested Salem and Issa.
14. That in an interview, Issa admitted that he had lied to the police and that he knew that they had purchased the bus passes from R.W. and that they were stolen.
15. That in an interview, Salem again denied purchasing the tickets. Salem did not admit that he had purchased the stolen bus tickets until after Issa told him to tell the truth.
16. That the Milwaukee County District Attorney's Office charged Salem with receiving stolen property and obstructing an officer.
17. That the Milwaukee County District Attorney's Office charged Issa with obstructing an officer.
18. That the conduct of Kamal Issa, d/b/a West Allis Cigarette Depot, substantially relates to the licensed activity contrary to West Allis Revised Municipal Ordinance 9.04 and Wis. Stat. § 134.65 and is grounds for non-renewal, suspension, or revocation of its Cigarette and Tobacco license.

WHEREFORE, Michael J. Czaplewski requests that Kamal Issa, d/b/a West Allis Cigarette Depot, 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 Cigarette and Tobacco Product License of Kamal Issa, d/b/a West Allis Cigarette Depot should be revoked, suspended, or not renewed.

Dated at this 18 day of March, 2010.

By:   
Michael J. Czaplewski, License & Health  
Committee  
West Allis Common Council

Subscribed and sworn to before me  
this 18 day of March, 2010.

  
( Jeanette Meites )  
Notary Public, State of Wisconsin  
My Commission expires permanent

