

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

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**In the Matter of the  
Complaint Against**

**COMPLAINT**

**Dilneet Corporation, d/b/a West Allis Liquor & Tobacco  
C/o Rupinder Randhawa, registered agent**

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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 Dilneet Corporation 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 the chair 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, which records complainant believes to be reliable and accurate.
3. That Dilneet Corporation is the holder of a Class A Beer and Class A Liquor License, License No. 11-1080, to sell alcoholic beverages under Chapter 125, Wis. Stat., issued by the West Allis Common Council for the license period beginning July 1, 2011, and ending June 30, 2012.
4. That Dilneet Corporation is the holder of a Cigarette and Tobacco Products License, License No. 11-1081, to sell cigarette and tobacco products under Chapter 139, Wis. Stat., issued by the West Allis Common Council for the license period beginning July 1, 2011, and ending June 30, 2012.

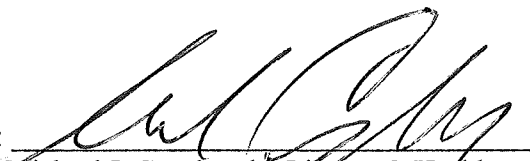
5. That Dilneet Corporation is the holder of a Food-Related Permit/License to sell food under Chapter 75 of the Wisconsin Agriculture, Trade & Consumer Protection Code, issued by the West Allis Common Council for the license period beginning July 1, 2011, and ending June 30, 2012.
6. That Dilneet Corporation does business under the trade name "West Allis Liquor & Tobacco."
7. That Rupinder Randhawa is the agent of Dilneet Corporation's above-referenced licenses.
8. That the City of West Allis assessed and levied a 2010 real estate tax pursuant to Chapters 70 and 74 of the Wisconsin Statutes against Dilneet Corporation in the amount of Seven Thousand Seven Hundred Three and 54/100 Dollars (\$7,703.54).
9. That Dilneet Corporation was delinquent in paying said real estate taxes in full as of September 27, 2011, and, accordingly, the West Allis City Clerk and West Allis Health Department withheld the issuance of a 2011-2012 Class A beer license, Class A liquor license, tobacco license, and food-related permit/license to Dilneet Corporation until the taxes were paid in full, pursuant to Ordinance 1.08(9)(a).
10. That to obtain a 2011-2012 Class A beer license, Class A liquor license, tobacco license, and food sales license, Dilneet Corporation, by Randhawa, agreed to pay \$500.00 per month, beginning on October 3, 2011, and continuing by the first of each month, November 1, 2011, and thereafter until the balances of the taxes were paid in full. (See Attached Exhibit 1 "Agreement.")
11. That Dilneet paid the initial \$500.00 on October 11, 2011, but failed to make any subsequent payments until December 5, 2011, when it paid \$1000.00.
12. That according to the records of the West Allis City Clerk's office, Assistant City Clerk Monica Schultz notified Rupinder Randhawa in writing on November 29,

2011 that she was required to appear at the December 6, 2011 License and Health meeting to discuss Dilneet's non-payment of its real estate taxes per the terms of the Agreement. (See Attached Exhibit 2.)

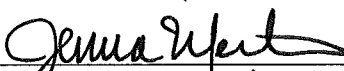
13. That Randhawa did not appear at the December 6, 2011 meeting and did not contact the clerk's office.
14. That the conduct of Dilneet Corporation, by registered agent Rupinder Randhawa, substantially relates to the licensed activity contrary to West Allis Revised Municipal Ordinance 9.02(12)(b) and 9.02(12)(d) and is grounds for non-renewal, suspension, or revocation of its Class A liquor license, tobacco license, and food-related permit/license.

**WHEREFORE**, Michael J. Czaplewski, requests that Dilneet Corporation, by registered agent Rupinder Randhawa, 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 Class A beer license, Class A liquor license, tobacco license, and food-related permit/license of Dilneet Corporation should be revoked, suspended, or not renewed.

Dated at this 22 day of Dec, 2011.

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

Subscribed and sworn to before me  
this 22nd day of December, 2011.

  
( Jenna Merten )  
Notary Public, State of Wisconsin  
My Commission expires: is permanent

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**COPY**

## AGREEMENT

This **AGREEMENT** is made and effective as of the date signed below; by and amongst the City of West Allis, hereinafter referred to as "City," and "Dilneet Corporation d/b/a West Allis Liquor & Tobacco" by Rupinder Randhawa, hereinafter referred to as "Randhawa."

**WHEREAS**, on January 1, 2010, the City assessed and levied a 2010 real estate tax pursuant to Chapters 70 and 74 of the Wisconsin Statutes against Randhawa in the amount of Seven Thousand Seven Hundred Three and 54/100 Dollars (\$7,703.54); and,

**WHEREAS**, on January 1, 2010, the City assessed and levied a 2010 personal property tax pursuant to Chapter 74 of the Wisconsin Statutes against Randhawa in the amount of Six Hundred Sixteen and 26/100 Dollars (\$616.26); and,

**WHEREAS**, interest of 1.5% per month accrues on the unpaid principal amount of the real estate tax and personal property tax;

**WHEREAS**, Randhawa attempted payment of the taxes, but the checks bounced and cost the City \$50 in non-sufficient fund fees;

**WHEREAS**, Randhawa is delinquent in paying said personal property taxes and real estate taxes in full, as of September 27, 2011; and,

**WHEREAS**, the City Clerk's Department withheld the issuance of a 2011-2012 Class A liquor license, tobacco license, and food sales license to Randhawa until she had paid said delinquent real estate and personal property taxes in full; and

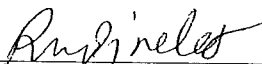
**WHEREAS**, Randhawa seeks to obtain a 2011-2012 Class A liquor license, tobacco license, and food sale license for West Allis Liquor & Tobacco as soon as possible so as to not interrupt its business operations for the current year;

**NOW, THEREFORE**, based upon the foregoing, the City and Randhawa agree to the following:

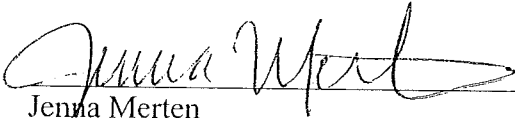
Randhawa agrees to pay the 2010 delinquent real estate and personal property taxes, hereinafter referred to as "taxes," and non-sufficient fund fees on the following terms:

1. Randhawa will pay Five Hundred and 00/100 Dollars to the City of West Allis on or before October 3, 2011 for the delinquent taxes. The check should be made **payable to the City of West Allis** and directed to Assistant City Attorney Jenna Merten at City Hall. The City will send the payments on Randhawa's behalf to the Milwaukee County treasurer when applicable.
2. Randhawa will pay at a rate of \$500.00 by the first of each month (November 2011 onward) until the balance of the taxes – principal and interest – and non-sufficient fund fees are paid in full.

In the event that Randhawa fails to adhere to the terms of this **AGREEMENT**, the City reserves its right to immediately revoke any and all liquor, tobacco, and food sales licenses granted to Randhawa without further notice, at which point Randhawa would no longer be able to legally operate her business within the City of West Allis. In the event that the City takes action to revoke any licenses, Randhawa maintains her right to appeal said revocation to the License and Health Committee of the City of West Allis.

  
\_\_\_\_\_  
Rupinder Randhawa  
Dilneet Corporation d/b/a West Allis Liquor & Tobacco

9-30-2011  
Date

  
\_\_\_\_\_  
Jenna Merten  
Assistant City Attorney  
City of West Allis

9/29/11  
Date