



City of West Allis

Meeting Agenda

License and Health Committee

Aldersperson Vincent Vitale, Chair
Aldersperson Suzzette Grisham, Vice-Chair
Alderspersons: Rosalie L. Reinke, Daniel J. Roadt, and Tracy Stefanski

Wednesday, December 28, 2022

5:30 PM

City Hall, Room 128
7525 W. Greenfield Ave.

REGULAR MEETING

A. CALL TO ORDER

B. ROLL CALL

C. APPROVAL OF MINUTES

1. [2022-1139](#) December 19, 2022 Draft License and Health Committee Minutes.

Recommendation: Approve

D. MATTERS FOR DISCUSSION/ACTION

E. CLOSED SESSION

2. [2022-1077](#) Summons and Complaint in the matter of complaints against Limanski's Pub, 8900 W. Greenfield Avenue, Agent Kathy Goedde.
3. [2022-1083](#) Summons and Complaint in the matter of complaints against Kane's Bar and Grill, 6922 W. Orchard Street, Agent Edward Jones.

For agenda items #2 and #3, file numbers 2022-1077 and 2022-1083, the committee may convene in closed session pursuant to the provisions of WI State Statutes Sections 19.85(1)(a) and (g) for the purpose of deliberating concerning a case which was the subject of any quasi-judicial hearing and conferring with the city attorney who will render oral or written advice concerning strategy to be adopted with respect to litigation in which the city is or is likely to become involved. This committee may reconvene in open session after completion of the closed session to consider the balance of the agenda.

F. ADJOURNMENT



All meetings of the License and Health Committee are public meetings. In order for the general public to make comments at the committee meetings, the individual(s) must be scheduled (as an appearance) with the chair of the committee or the appropriate staff contact; otherwise, the meeting of the committee is a working session for the committee itself, and discussion by those in attendance is limited to committee members, the mayor, other alderpersons, staff and others that may be a party to the matter being discussed.

NOTICE OF POSSIBLE QUORUM

It is possible that members of, and possibly a quorum of, members of other governmental bodies of the municipality may be in attendance at the above-stated meeting to gather information. No action will be taken by any governmental body at the above-stated meeting other than the governmental body specifically referred to above in this notice.

NON-DISCRIMINATION STATEMENT

The City of West Allis does not discriminate against individuals on the basis of race, color, religion, age, marital or veterans' status, sex, national origin, disability or any other legally protected status in the admission or access to, or treatment or employment in, its services, programs or activities.

AMERICANS WITH DISABILITIES ACT NOTICE

Upon reasonable notice the City will furnish appropriate auxiliary aids and services when necessary to afford individuals with disabilities an equal opportunity to participate in and to enjoy the benefits of a service, program or activity provided by the City.

LIMITED ENGLISH PROFICIENCY STATEMENT

It is the policy of the City of West Allis to provide language access services to populations of persons with Limited English Proficiency (LEP) who are eligible to be served or likely to be directly affected by our programs. Such services will be focused on providing meaningful access to our programs, services and/or benefits.



City of West Allis

Meeting Minutes

License and Health Committee

Aldersperson Vincent Vitale, Chair
Aldersperson Suzzette Grisham, Vice-Chair
Alderspersons: Rosalie L. Reinke, Daniel J. Roadt, and Tracy Stefanski

Monday, December 19, 2022

5:30 PM

City Hall, Room 128
7525 W. Greenfield Ave.

REGULAR MEETING

A. CALL TO ORDER

Ald. Grisham called the meeting to order at 5:32 p.m.

B. ROLL CALL

Present 4 - Grisham, Reinke, Roadt, and Stefanski

Excused 1 - Vitale

C. APPROVAL OF MINUTES

1. [2022-1088](#) November 15, 2022 Draft License and Health Committee Minutes.

Ald. Stefanski moved to approve this matter, Ald. Reinke seconded, motion carried

D. MATTERS FOR DISCUSSION/ACTION

2. [2022-1077](#) Summons and Complaint in the matter of complaints against Limanski's Pub, 8900 W. Greenfield Avenue, Agent Kathy Goedde.
3. [2022-1083](#) Summons and Complaint in the matter of complaints against Kane's Bar and Grill, 6922 W. Orchard Street, Agent Edward Jones.

License and Health Committee members agreed to set a second meeting date and time of Wednesday, December 28, 2022 at 5:30 p.m. for closing arguments and closed session deliberations.

E. ADJOURNMENT

Ald. Stefanski moved to adjourn at 10:03 p.m., Ald. Reinke seconded, motion carried.



All meetings of the {bdName} are public meetings. In order for the general public to make comments at the committee meetings, the individual(s) must be scheduled (as an appearance) with the chair of the committee or the appropriate staff contact; otherwise, the meeting of the committee is a working session for the committee itself, and discussion by those in attendance is limited to committee members, the mayor, other alderpersons, staff and others that may be a party to the matter being discussed.

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The City of West Allis does not discriminate against individuals on the basis of race, color, religion, age, marital or veterans' status, sex, national origin, disability or any other legally protected status in the admission or access to, or treatment or employment in, its services, programs or activities.

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It is the policy of the City of West Allis to provide language access services to populations of persons with Limited English Proficiency (LEP) who are eligible to be served or likely to be directly affected by our programs. Such services will be focused on providing meaningful access to our programs, services and/or benefits.

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

**In the Matter of the
Complaint Against**

SUMMONS

**CRG Investments LLC
D/B/A Limanski's Pub**

**Premises Location:
8900 W. Greenfield Ave.
West Allis, WI 53214**

Agent: Kathy Goedde

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

**THE WEST ALLIS COMMON COUNCIL TO CRG Investments LLC by licensing
agent Kathy Goedde:**

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 or revocation of the 2022-2023 "Class B" intoxicating liquor license, a Class "B" fermented malt beverage license, and a Public Entertainment Permit, all issued under license number ALC-22-148, for the premises located at 8900 W. Greenfield Avenue in the City of West Allis, State of Wisconsin, for the license period running July 1, 2022, and expiring on June 30, 2023. This sworn complaint requesting a hearing for suspension or revocation of the above referenced licenses or permits is brought pursuant to the provision of Wis. Stat. § 125.12(2) and West Allis Code §§ 9.51, 9.60(5), and 9.76(5).

NOW THEREFORE, you, CRG Investments LLC by licensing agent Kathy Goedde, are hereby summoned to appear before the License and Health Committee of the West Allis Common Council on November 15, 2022 at 6:30 p.m., 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 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 or revoke 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 7th day of November, 2022.

WEST ALLIS COMMON COUNCIL

By: Rebecca N. Grill
Rebecca Grill
City Administrator and City Clerk

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

**In the Matter of the
Complaint Against**

COMPLAINT

**CRG Investments LLC
D/B/A Limanski's Pub**

**Premises Location:
8900 W. Greenfield Ave.
West Allis, WI 53214**

Agent: Kathy Goedde

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

Detective Brandon Hurley 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 CRG Investments LLC doing business as "Limanski's Pub" as follows:

1. That the complainant is a resident of the City of West Allis.
2. That this complaint is based upon information contained within official records maintained by the City of West Allis and the City of West Allis Police Department that the complainant has used in the past and found to be reliable.
3. That CRG Investments LLC does business as "Limanski's Pub" and currently holds a "Class B" intoxicating liquor license and a Class "B" fermented malt beverage license (together identified on the license as a "Class B Tavern License"), and a Public Entertainment Permit, all issued under license number ALC-22-148, for the

premises located at 8900 W. Greenfield Avenue in the City of West Allis, State of Wisconsin, for the license period running July 1, 2022 to June 30, 2023.

4. That Kathy Goedde is the agent appointed pursuant to Wis. Stat. § 125.04(6)(a) for license number ALC-22-148.
5. That the premises has held a "Class B" intoxicating liquor license and a Class "B" fermented malt beverage license for several years, with the prior license being issued under license number 2021-072 for the license period running July 1, 2021, through June 30, 2022.
6. That on or about June 22, 2022, police were dispatched to Limanski's Pub located at 8900 W. Greenfield Avenue for a large fight in progress. Police arrived on the scene and observed a large group of people outside the bar. Officers were able to determine that there was a verbal disagreement between two groups that originated inside the bar before that altercation moved outside the bar and into the community. Police were able to determine that one group associated with the fight remained outside the bar while another party involved in the fight had been moved by bar staff to the basement of the bar.

Officer Lonnie Christianson made contact with Dale W. who was one of the parties identified as being involved in the fight and was still outside the bar. Officer Christianson identified that Dale W. was "very intoxicated," was profane, loud, and disorderly while outside the bar and in her contact with him.

Officers were notified that the other party involved in the fight may have pointed a gun at Dale W. Based on the nature of the call for service, police ordered the subject in the basement to exit the building and made contact with a subject, Michael R.

Body camera footage shows Limanski's Pub staff exiting the basement just before Michael R. comes out. Police conducted a consent search of the basement of the bar and found a firearm hidden in a freezer door by the stairs and a black bag with a label of "cookies" that contained approximately 195 grams of marijuana, 5.13 grams of methamphetamine, and 7.55 grams of cocaine. Police investigation revealed that the gun and drugs were taken to the basement by Michael R. in this incident.

Police recovered surveillance video showing a portion of the basement of the bar. That video depicts at least one male employee, believed to be Michael N., of Limanski's Pub present in the basement with Michael R. as he makes attempts to conceal gun and drugs. This male employee can be seen entering and exiting the video and is also the same male employee that police see exit the basement ahead of Michael R.

7. That on August 14, 2022, at approximately 12:45 AM, police were dispatched to Limanski's Pub for a physical fight outside the bar. Police identified that a bar patron identified as Nicole K., was outside smoking a cigarette with her fiancé when two unknown parties pushed her and her fiancé. Police Officer Aric Behnke had contact with the bartender on duty, Michael N. who reported that he was not aware of any problems. Michael N. is the same employee observed in the basement during the June 22, 2022 incident.
8. That on September 9, 2022, police were dispatched to Limanski's Pub for a battery complaint. Police made contact with Brian D. who reported the assault at the bar. Officer laquinta reported that he made contact with Brian D., who was apparently highly intoxicated. Officer laquinta made contact with bartender Michael N. who

stated that there was only a verbal altercation with the patrons. This Michael N. is the same employee seen in the basement on June 22, 2022, and referenced in the August 14th, 2022 altercation.

9. That on October 9, 2022, at approximately 3:30 AM, police were dispatched to Limanski's Pub for a report of an assault. Police determined that a male party had been assaulted outside the bar and a gold necklace was removed from his neck. There were no known suspects. When police arrived on scene just after 3:30 AM, they determined that there were still patrons inside Limanski's Pub. One citation was issued to Michael N. (same bartender identified in all prior incidents) for allowing patrons to remain on the premises after closing.
10. That later that same day on October 9, 2022, at approximately 8:22 PM, police responded to Limanski's Pub for a large fight inside the business. Officer Stelter obtained information that the fight seemed to originate within the bar before spilling out into the community. One community member with initials A.S. identified that she was watching tv at home when the fight exited the bar into the streets. She said some of the bar patrons entered her yard and continued fighting. One patron removed one of the rocks in her yard and attempted to throw it or use it as a weapon.

Officer Stelter had contact with bar owner Kathy Goedde regarding the incident. Police requested to view the bar's surveillance video, but Ms. Goedde stated it would take an hour to download the interior video. As of October 10, police did not get a return phone call that the footage was available.

11. That on October 23, 2022, police were dispatched to Limanski's Pub for a report of multiple assaults. Police determined that a subject by the name of Cassandra D. had assaulted two bar employees. Cassandra D. was identified as being highly intoxicated by bar staff, but she had fled prior to police arriving. Cassandra D. was issued multiple citations and a warrant was issued for her with probation and parole.

12. That pursuant to Wis. Stat. §125.12(2) any license issued under Wis. Stat. Ch. 125 is subject to suspension or revocation for any of the following:

- A. Violating Wis. Stat. § 125.07(2)(a)(2), per Wis. Stat. § 125.12(2)(ag)1. for serving persons who are intoxicated;
- B. Keeping or maintaining a disorderly or riotous, indecent or improper house in violation of Wis. Stat. § 125.12(2)(ag)2.; and
- C. Knowingly allowing another person or employee on the premises who possesses with the intent to distribute or deliver a controlled substance or controlled substance analog in violation of Wis. Stat. § 125.12(2)(ag)6.

13. That pursuant to West Allis Municipal Code §§ 9.51b. and 9.51d. the Public Entertainment Permit is subject to suspension or revocation when the operator has failed to maintain order on the premises and has caused a public nuisance at the property, demonstrated by the bar staff allowing individuals to hide drugs and gun, serving patrons past the point of intoxication, and maintaining a bar that is continually the catalyst for fights and violent behavior spilling out into the community.

WHEREFORE, Detective Brandon Hurley requests that the licensees named herein, CRG Investments LLC, 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 licenses and permits issued to CRG Investments LLC, should be revoked or suspended.

Dated this 1st day of November, 2022.

By: Det. B. Hurley, #66
Print Name: Det. B. Hurley, #66
City of West Allis Police Department

Subscribed and sworn to before me
this 1 day of November, 2022.
Nicholas S. Cerwin
(Nicholas S. Cerwin)
Notary Public, State of Wisconsin
My Commission expires: Permanent



Affidavit of Process Server

Court/Appearance Date: 11/15/22
City of West Allis

Case Number _____
EKC Investments, LLC
dba Kane's Bar & Grill

Vs

I the undersigned am an adult resident of the state of Wisconsin and not a party to the action. I hereby swear that on November 9 2022 at 12:55 p.m. I duly served/or attempted to serve, (see nonservice section)

NAME CRG Investments LLC dba Limanski's Bar

DEFENDANT PETITIONER OTHER ATTEMPTED DATES _____
 GARNISHEE DEFENDANT RESPONDENT
 PLAINTIFF WITNESS

By serving Hannah Milbauer Person in Charge _____ at _____
Home _____ Name _____ Title/Relationship _____ Wisconsin
Business 8900 W. Greenfield Ave. City of West Allis _____ Wisconsin

Manner of Service:

- Personal Service
- Corporate Service: by leaving, during office hours, copies at the office of the person/entity being served, leaving same with the person apparently in charge thereof.
- After diligent search and inquiry, having made _____ attempts by leaving true & correct copies of the above documents with a competent occupant of the residence over the age of 14 and informed that person of the contents thereof. (See other Attempt Dates)
- Posting copies in a conspicuous manner to the address of the person/entity being served. (Use only for evictions)
- Copies of the documents were mailed by prepaid, first-class mail on: _____ DATE _____ FROM _____

Nonservice: after due search, careful inquiry and diligent attempts at the address(s) listed above, I have been unable to effect process upon the person/entity being served because of the following reason(s):

- Unknown at address Moved no forwarding Refuses to cooperate in acceptance
- Address does not exist Evading Service cancelled by litigant
- Not home three attempts Unable to serve in a timely fashion Search was conducted, whereabouts unknown

The following attempts were made to personally serve Kathy Goedde (Registered Agent for CRG Investments LLC): 11/7/22 4:20pm (not in), 11/8/22 7:38pm (not in), 11/9/22 12:55pm (not in). On 11/7/22 server left contact information with staff. No response from Kathy Goedde.

Type of Documents:

- ELECTRONIC FILING NOTICE ORDER TO SHOW CAUSE & AFFIDAVIT
- SUMMONS AND COMPLAINT BLANK FINANCIAL DISCLOSURE STATEMENT
- NOTICE OF MOTION AND MOTION/AFFIDAVIT ADMINISTRATIVE DISMISSAL DATE
- NOTICE OF HEARING SUMMONS AND PETITION-DIVORCE
- COVER LETTER CONFIDENTIAL PETITION ADDENDUM
- SUBPOENA DUCES TECUM

At the time of service, I did place upon it the date, time, and my name, leaving a true and correct copy thereof, and that the server knew the person so served to be the defendant (or other) mentioned and named therein.

NUMBER OF ATTEMPTS 3 NUMBER OF ADDRESSES ATTEMPTED (if more than one) _____
 SERVICE FEE \$ 35.00 WITNESS FEE \$ _____
 FILING FEE \$ _____ SEARCH FEE \$ _____
 TOTAL FEE \$ 35.00 MILEAGE \$ _____

Server's Name Carlton W. Manske (Print) Server's Signature Carlton Manske

Subscribed and sworn to before me
This 15 day of November, 2022
Notary Public Waukesha Co., State of Wisconsin
My Commission expires 02/24/2026





City Clerk
City Clerk's Office
clerk@westalliswi.gov
414.302.CITY

OFFICE OF CITY CLERK
CITY OF WEST ALLIS, WISCONSIN

Sent via USPS and emailed to limanskispub@gmail.com

Thursday, December 1, 2022

Kathy Goedde
W215N5419 Adamdale Drive
Menomonee Falls, WI 53051

RE: Summons and Complaint against Limanski's Pub

Dear Ms. Goedde;

The License and Health Committee Chairman orders you to appear at a scheduled, televised hearing before the License and Health Committee on Monday, December 5, 2022 at 5:30PM, in Room 128 at West Allis City Hall, 7525 W. Greenfield Avenue. Please park in the parking lot on the south side of the building. Room 128 is the first room on your right when you enter the building.

Per Wis. Stat. 125.12, if the licensee fails to appear for the scheduled hearing, the allegations of the complaint shall be taken as true and the license may be revoked by the West Allis Common Council.

If you have questions, please email clerk@westalliswi.gov.



City Clerk
City Clerk's Office
clerk@westalliswi.gov
414.302.CITY

OFFICE OF CITY CLERK
CITY OF WEST ALLIS, WISCONSIN

Sent via USPS and emailed to limanskispub@gmail.com

Tuesday, December 6, 2022

Kathy Goedde
W215N5419 Adamdale Drive
Menomonee Falls, WI 53051

RE: Summons and Complaint against Limanski's Pub

Dear Ms. Goedde;

The License and Health Committee Chairman orders you to appear at a scheduled, televised hearing before the License and Health Committee on Monday, December 19, 2022 at 5:30PM, in Room 128 at West Allis City Hall, 7525 W. Greenfield Avenue. Please park in the parking lot on the south side of the building. Room 128 is the first room on your right when you enter the building.

Per Wis. Stat. 125.12, if the licensee fails to appear for the scheduled hearing, the allegations of the complaint shall be taken as true and the license may be revoked by the West Allis Common Council.

If you have questions, please email clerk@westalliswi.gov.



City Clerk
City Clerk's Office
clerk@westalliswi.gov
414.302.CITY

OFFICE OF CITY CLERK
CITY OF WEST ALLIS, WISCONSIN

Sent via USPS and emailed to limanskispub@gmail.com

Thursday, December 22, 2022

Kathy Goedde
W215N5419 Adamdale Drive
Menomonee Falls, WI 53051

RE: Summons and Complaint against Limanski's Pub

Dear Ms. Goedde;

The License and Health Committee will be meeting again on Wednesday, December 28, 2022 at 5:30PM, in Room 128 at West Allis City Hall, 7525 W. Greenfield Avenue to continue the hearing held on Monday, December 19, 2022.

Per Wis. Stat. 125.12, if the licensee fails to appear for the scheduled hearing, the allegations of the complaint shall be taken as true and the license may be revoked by the West Allis Common Council.

If you have questions, please email clerk@westalliswi.gov.

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

**In the Matter of the
Complaint Against**

SUMMONS

**EKC Investments LLC
D/B/A Kane's Bar & Grill**

**Premises Location:
6922 W. Orchard St.
West Allis, WI 53214**

Agent: Ed Jones

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

**THE WEST ALLIS COMMON COUNCIL TO EKC Investments LLC by licensing
agent Ed Jones:**

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 or revocation of the 2022-2023 "Class B" intoxicating liquor license, a Class "B" fermented malt beverage license, and a Public Entertainment Permit, all issued under license number ALC-22-1, for the premises located at 6922 W. Orchard Street in the City of West Allis, State of Wisconsin, for the license period running July 1, 2022, and expiring on June 30, 2023. This sworn complaint requesting a hearing for suspension or revocation of the above referenced licenses or permits is brought pursuant to the provision of Wis. Stat. § 125.12(2) and West Allis Code §§ 9.51, 9.60(5), and 9.76(5).

NOW THEREFORE, you, EKC Investments LLC by licensing agent Ed Jones, are hereby summoned to appear before the License and Health Committee of the West Allis Common Council on November 15, 202 at 6:30 p.m., 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 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 or revoke 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 7th day of November, 2022.

WEST ALLIS COMMON COUNCIL

By: Rebecca N. Grill
Rebecca Grill
City Administrator and City Clerk

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

**In the Matter of the
Complaint Against**

COMPLAINT

**EKC Investments LLC
D/B/A Kane’s Bar & Grill**

**Premises Location:
6922 W. Orchard St.
West Allis, WI 53214**

Agent: Ed Jones

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

Detective Brandon Hurley 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 EKC Investments LLC and doing business as “Kane’s Bar & Grill” as follows:

- 1. That the complainant is a resident of the City of West Allis.
- 2. That this complaint is based upon information contained within official records maintained by the City of West Allis and the City of West Allis Police Department that the complainant has used in the past and found to be reliable.
- 3. That EKC Investments LLC, doing business as “Kane’s Bar & Grill” has been issued a “Class B” intoxicating liquor license and a Class “B” fermented malt beverage license (together identified on the license as a “Class B Tavern License”), and a Public Entertainment Permit, all issued under license number ALC-22-1, for the premises

located at 6922 W. Orchard Street in the City of West Allis, State of Wisconsin, for the license period running July 1, 2022, and expiring on June 30, 2023.

4. That Ed Jones is the agent appointed pursuant to Wis. Stat. § 125.04(6)(a) for license number ALC-22-1. Kathy Goedde is identified as a vice president of EKC Investments LLC.
5. That EKC Investments LLC first obtained a Class B Tavern and Public Entertainment license for the premises located at 6922 W. Orchard Street on February 9, 2022. This license ran from February until the end of the license period on June 30, 2022. At that time the 2022-2023 license period began under ALC-22-1. Ed Jones was the agent for that license as well.
6. That on July 2, 2022, officers were dispatched to Kane's Bar & Grill at 6922 W. Orchard Street regarding a potential overdose. Officer Roth arrived on scene and made contact with individuals at the bar. Officer Roth observed that a bar employee identified as Kathy G. had overdosed and was on the ground near the bar. The West Allis Fire Department began to render aid. The West Allis Fire Department administered Narcan, a substance used in emergency situations to help reverse the effects of an opioid overdose, which was effective and Kathy G. became responsive. Kathy G. denied taking any illegal substance, despite Officer Schrandt explaining that Narcan only works to counteract opiates.

Officer Roth identified a second employee, Chad H., that appeared to be under the influence of some type of drug. Chad H. originally told officer Roth that Kathy G. had gone outside with an unknown male before the overdose event occurred. Chad H. was confronted about his impairment. He stated that he did not use drugs with his

boss, Kathy G. Chad H. also admitted that he had some “leftover” cocaine on his person. The substance found on his person was described as a white chunky substance, weight of approximately .94 grams. Sergeant Clint Corwin tested that substance using the Nark II (07) Scott Reagent Modified Field Test. The substance tested positive as cocaine base (cocaine).

Two other employees on scene, M.N. and K.P. advised that approximately 15 minutes before the overdose event, they observed Chad H. and Kathy G. go outside for a smoke break. The two remained outside for a period of time and upon returning inside the bar, both were sweating profusely and Kathy G. began to show signs of overdosing.

7. That the above incident occurred exactly ten (10) days after an incident involving the recovery of a firearm and a substantial quantity of drugs, including cocaine, was found in the basement of Limanski’s Pub, another bar that is owned and managed by Kathy Goedde.
8. That police have had other contacts at the property since EKC Investments LLC began to utilize the alcohol license for the premises.
 - A. On March 13, 2022, police conducted a tavern check of the premises and identified that the tavern license was not on display as required by Wis. Stat. 125.04(10)(b).
 - B. Police were also dispatched to the location multiple times between March 26, 2022, through September 24, 2022, for noise complaints and other disturbances from employees or former employees. Those complaints were as follows:

- i. March 26, 2022- Noise complaint identified by a 3rd party. Police were not able to confirm the noise violation and no action was taken by police at that time.
- ii. May 15, 2022- Noise complaint identified by a 3rd party. Police went to the scene and observed the violation. Police asked employees to close the doors.
- iii. May 20, 2022- Noise complaint identified by 3rd party. Police were not able to independently confirm so no action taken by police.
- iv. May 26, 2022- Noise complaint observed although determined not to be loud enough to cause a disturbance at the time officer arrived. Employee stated that someone had the door open briefly but they will continue to keep door closed to avoid issue in future.
- v. September 3, 2022- Noise complaint identified by a 3rd party regarding loud music. Police dispatched but could not independently confirm. No action taken by police at that time.
- vi. September 18, 2022- Current employees contacted police about a former employee, Cassie, banging on the back door and scaring current employees. After the initial call, police were unable to make contact with any individuals involved.
- vii. September 24, 2022- Noise complaint regarding loud music and the doors of the bar being open. Police attempted to contact the bar via telephone but there was no answer. The owner of the bar was contacted and indicated he would handle the matter.

9. That pursuant to Wis. Stat. §125.12(2) any license issued under Wis. Stat. Ch. 125 is subject to suspension or revocation for any of the following:
- A. Violating Wis. Stat. § 125.04(10)(b), per Wis. Stat. § 125.12(2)(ag)1. for failure to display the license;
 - B. Keeping or maintaining a disorderly or riotous, indecent or improper house in violation of Wis. Stat. § 125.12(2)(ag)2.; and
 - C. Knowingly allowing another person or employee on the premises who possesses with the intent to distribute or deliver a controlled substance or controlled substance analog in violation of Wis. Stat. § 125.12(2)(ag)6.
10. That pursuant to West Allis Municipal Code §§ 9.51b. and 9.51d. the Public Entertainment Permit is subject to suspension or revocation when the operator has failed to maintain order on the premises and has caused a public nuisance at the property, demonstrated by the noise complaints and more pressingly by employees using and sharing controlled substances at the premises.

WHEREFORE, Detective Brandon Hurley requests that the licensees named herein, EKC Investments LLC, 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 licenses and permits issued to EKC Investments LLC, should be revoked or suspended.

[This space left blank. Signature page to follow]

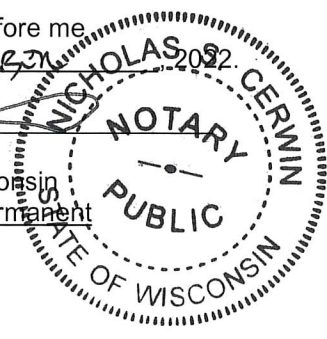
Dated this 1st day of November, 2022.

By: Det. B. Hurley, #66

Print Name: Det. B. Hurley, #66
City of West Allis Police Department

Subscribed and sworn to before me
this 1 day of November, 2022.

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



Affidavit of Process Server

Court/Appearance Date: 11/15/22
City of West Allis

Case Number _____
EKC Investments, LLC
dba Kane's Bar & Grill

Vs

I the undersigned am an adult resident of the state of Wisconsin and not a party to the action. I hereby swear that on November 9 2022 at 12:40 p.m. I duly served/or attempted to serve, (see nonservice section)

NAME EKC Investments LLC dba Kane's Bar and Grill

DEFENDANT PETITIONER OTHER ATTEMPTED DATES _____
 GARNISHEE DEFENDANT RESPONDENT
 PLAINTIFF WITNESS

By serving Justin Duwe Kitchen Manager at _____
Home _____ Name _____ Title/Relationship _____ Wisconsin
Business 6922 W. Orchard St. City of West Allis _____ Wisconsin

Manner of Service:

- Personal Service
- Corporate Service: by leaving, during office hours, copies at the office of the person/entity being served, leaving same with the person apparently in charge thereof.
- After diligent search and inquiry, having made _____ attempts by leaving true & correct copies of the above documents with a competent occupant of the residence over the age of 14 and informed that person of the contents thereof. (See other Attempt Dates)
- Posting copies in a conspicuous manner to the address of the person/entity being served. (Use only for evictions)
- Copies of the documents were mailed by prepaid, first-class mail on: _____ DATE _____ FROM _____

Nonservice: after due search, careful inquiry and diligent attempts at the address(s) listed above, I have been unable to effect process upon the person/entity being served because of the following reason(s):

- Unknown at address Moved no forwarding Refuses to cooperate in acceptance
- Address does not exist Evading Service cancelled by litigant
- Not home three attempts Unable to serve in a timely fashion Search was conducted, whereabouts unknown

The following attempts were made to personally serve Ed Jones (Registered Agent of EKC Investments LLC): 11/7/22 4:08pm (business closed), 11/8/22 7:48pm (business closed), 11/9/22 12:40pm (not in).

Type of Documents:

- ELECTRONIC FILING NOTICE
- SUMMONS AND COMPLAINT
- NOTICE OF MOTION AND MOTION/AFFIDAVIT
- NOTICE OF HEARING
- COVER LETTER
- ORDER TO SHOW CAUSE & AFFIDAVIT
- BLANK FINANCIAL DISCLOSURE STATEMENT
- ADMINISTRATIVE DISMISSAL DATE
- SUMMONS AND PETITION-DIVORCE
- CONFIDENTIAL PETITION ADDENDUM
- SUBPOENA DUCES TECUM

At the time of service, I did place upon it the date, time, and my name, leaving a true and correct copy thereof, and that the server knew the person so served to be the defendant (or other) mentioned and named therein.

NUMBER OF ATTEMPTS 3 NUMBER OF ADDRESSES ATTEMPTED (if more than one) _____
SERVICE FEE \$ 35.00 WITNESS FEE \$ _____
FILING FEE \$ _____ SEARCH FEE \$ _____
TOTAL FEE \$ 35.00 MILEAGE \$ _____

Server's Name Carlton W. Manske (Print) Server's Signature Carlton Manske

Subscribed and sworn to before me
This _____ day of _____, 2022
Notary Public Waukesha Co., State of Wisconsin
My Commission expires 02/24/2026





City Clerk
City Clerk's Office
clerk@westalliswi.gov
414.302.CITY

OFFICE OF CITY CLERK
CITY OF WEST ALLIS, WISCONSIN

Sent via USPS and emailed to kanesbarandgrill@gmail.com

Thursday, December 1, 2022

Ed Jones
W215N5419 Adamdale Drive
Menomonee Falls, WI 53051

RE: Summons and Complaints against Kane's Bar & Grill

Dear Mr. Jones,

The License and Health Committee Chairman orders you to appear at a scheduled, televised hearing before the License and Health Committee on Monday, December 5, 2022 at 5:30PM, in Room 128 at West Allis City Hall, 7525 W. Greenfield Avenue. Please park in the parking lot on the south side of the building. Room 128 is the first room on your right when you enter the building.

Per Wis. Stat. 125.12, if the licensee fails to appear for the scheduled hearing, the allegations of the complaint shall be taken as true and the license may be revoked by the West Allis Common Council.

If you have questions, please email clerk@westalliswi.gov.



City Clerk
City Clerk's Office
clerk@westalliswi.gov
414.302.CITY

OFFICE OF CITY CLERK
CITY OF WEST ALLIS, WISCONSIN

Sent via USPS and emailed to kanesbarandgrill@gmail.com

Tuesday, December 6, 2022

Ed Jones
W215N5419 Adamdale Drive
Menomonee Falls, WI 53051

RE: Summons and Complaints against Kane's Bar & Grill

Dear Mr. Jones,

The License and Health Committee Chairman orders you to appear at a scheduled, televised hearing before the License and Health Committee on Monday, December 19, 2022 at 5:30PM, in Room 128 at West Allis City Hall, 7525 W. Greenfield Avenue. Please park in the parking lot on the south side of the building. Room 128 is the first room on your right when you enter the building.

Per Wis. Stat. 125.12, if the licensee fails to appear for the scheduled hearing, the allegations of the complaint shall be taken as true and the license may be revoked by the West Allis Common Council.

If you have questions, please email clerk@westalliswi.gov.



City Clerk
City Clerk's Office
clerk@westalliswi.gov
414.302.CITY

OFFICE OF CITY CLERK
CITY OF WEST ALLIS, WISCONSIN

Sent via USPS and emailed to kanesbarandgrill@gmail.com

Thursday, December 22, 2022

Ed Jones
W215N5419 Adamdale Drive
Menomonee Falls, WI 53051

RE: Summons and Complaints against Kane's Bar & Grill

Dear Mr. Jones,

The License and Health Committee will be meeting again on Wednesday, December 28, 2022 at 5:30PM, in Room 128 at West Allis City Hall, 7525 W. Greenfield Avenue to continue the hearing held on Monday, December 19, 2022.

Per Wis. Stat. 125.12, if the licensee fails to appear for the scheduled hearing, the allegations of the complaint shall be taken as true and the license may be revoked by the West Allis Common Council.

If you have questions, please email clerk@westalliswi.gov.