

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

**In the Matter of the
Complaint Against**

COMPLAINT

**H.K. PETROLEUMS, LLC,
Zubair Arshad, agent**

STATE OF WISCONSIN)
) ss.
COUNTY OF MILWAUKEE)

Michael J. Czaplewski, being duly sworn, on oath deposes and states as a complaint against H.K. Petroleums, LLC, as follows:

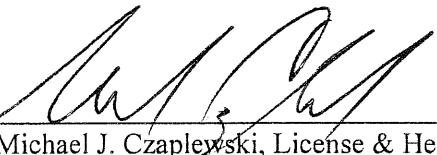
1. That the complainant is a resident of the City of West Allis, is the duly elected Alderperson for the First Aldermanic District in the City of West Allis, is the chairman of the License and Health Committee, and makes this complaint at the direction of the License and Health Committee of the West 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 H.K. Petroleums, LLC is the holder of a Tobacco License under License No. 1222, issued by the West Allis Common Council for the license period beginning July 1, 2008, and ending June 30, 2009, for the premises located at 5926 West Beloit Road, West Allis, Wisconsin and does business under the trade name "BP Gas."
4. That Zubair Arshad is the registered agent of H.K. Petroleums, LLC.
5. That on May 21, 2009, the West Allis Police Department initiated a tobacco compliance check at the aforementioned BP Gas convenience store.
6. That at the direction of Officer Jessica Wink, a 17-year-old male entered the

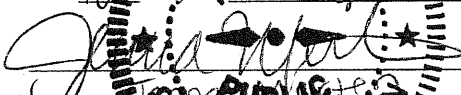
convenience store and purchased a tin of Grizzly chewing tobacco. After purchasing the item, the 17-year-old told Officer Wink that the clerk did not request an identification card or proof of age from him before selling him the tobacco.

7. That Officer Wink entered the convenience store and made contact with the clerk, Puran Chand, and issued him a citation for selling tobacco to a minor. Officer Wink also issued a citation to Arshad Zubair as the tobacco license holder for H.K. Petroleums, LLC.
8. That due to these citations, the License and Health Committee ordered Zubair to its meetings on July 7, 2009 and August 4, 2009. Zubair did not appear for either meeting.
9. That the conduct of H.K. Petroleums, LLC, by registered agent Arshad Zubair, substantially relates to the licensed activity contrary to Wis. Stat. §134.66 (2) and West Allis Revised Municipal Ordinances 6.02 (19) and 9.04(3) and are grounds for non-renewal, suspension, or revocation of its tobacco license.

WHEREFORE, Michael J. Czaplewski requests that H.K. Petroleums, 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 Tobacco License of H.K. Petroleums, LLC should be revoked, suspended, or not renewed.

Dated at this 10th day of Sept., 2009.

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

Subscribed and sworn to before me
this 10 day of Sept., 2009.

(Jenna Merten)
Notary Public, State of Wisconsin
My Commission Expires Permanent

