

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

**In the Matter of the
Complaint Against**

SUMMONS

**Vani’s Kitchen, Inc.
c/o agent Vigneshwar Bhadharla
d/b/a Vani’s Kitchen,**

STATE OF WISCONSIN)
) SS.
COUNTY OF MILWAUKEE)

**THE WEST ALLIS COMMON COUNCIL TO VANI’S KITCHEN INC. c/o AGENT
VIGNESHWAR BHADHARLA:**

You are hereby notified that a sworn complaint, a copy of which is attached, has been duly made and filed, requesting a hearing on the suspension, revocation, or non-renewal of your Class “B” Fermented Malt Beverage License Number 18-1984 and Class C Wine License Number 18-1984, pursuant to the provisions of sec. 125.12, Wis. Stat. and West Allis Revised Municipal Code Sections 9.02(20).

NOW THEREFORE, you, Vigneshwar Bhadharla as agent for Vani’s Kitchen Inc., are hereby summoned to appear before the License and Health Committee of the West Allis Common Council in Room 128 of the West Allis City Hall, 7525 West Greenfield Avenue, West Allis, Wisconsin, on April 23, 2019, at 6:00 p.m., 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.

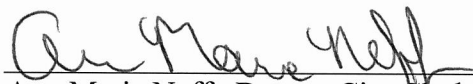
In the case of your failure to appear as required by this summons, the allegations in the complaint against you shall be taken as true and, if the License and Health Committee of the West Allis Common Council finds the allegations sufficient, a recommendation that your license(s) be suspended or revoked will be made to the full Common Council. The Common Council may then vote to suspend, revoke, or not renew 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 18th day of April, 2019.

WEST ALLIS COMMON COUNCIL

By:


Ann Marie Neff, Deputy City Clerk

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

**In the Matter of the
Complaint Against**

COMPLAINT

**Vani's Kitchen, Inc.
c/o agent Vigneshwar Bhadharla
d/b/a Vani's Kitchen,**

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

Michael J. Czaplewski, being duly sworn, on oath deposes and states as a complaint against Vani's Kitchen, Inc. d/b/a Vani's Kitchen as follows:

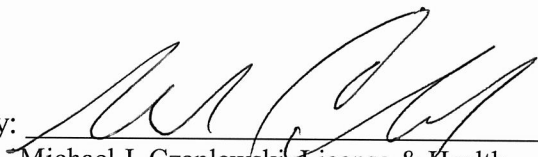
1. That the complainant is a resident of the City of West Allis, is the duly elected Alderperson for the First Aldermanic District in the City of West Allis, is the chair of the License and Health Committee, and makes this complaint at the direction of the License and Health Committee of the West Allis 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 Vani's Kitchen, Inc. is the holder of Class "B" Fermented Malt Beverage License Number 18-1984 and Class C Wine License Number 18-1984, conditionally granted by the West Allis Common Council for the license period beginning July 1, 2018, and ending June 30, 2019, for the premises located at 10535 West Greenfield Avenue, West Allis, Wisconsin and does business under the trade name "Vani's Kitchen."
4. That Vigneshwar Bhadharla is the registered agent and license agent of Vani's

Kitchen, Inc.


5. That on May 15, 2018, the Common Council conditionally approved Vani's Kitchen, Inc.'s Class "B" Fermented Malt Beverage License and Class C Wine License subject to the necessary requirements of obtaining said licenses.
6. That pursuant to West Allis Revised Municipal Code Section 9.02(6), all renewal applicants are required to obtain inspections from the Building Inspection and Neighborhood Services Department before an alcohol-related license may be issued.
7. That as of April 17, 2019, Vani's Kitchen, Inc. has failed to obtain that inspection and in fact, is no longer in operation at the licensed location. A separate entity has an occupancy permit for the location that Vani's Kitchen previously occupied.
8. That on March 20, 2019, Vani's Kitchen, by agent Vigneshwar Bhadharla, was ordered to appear at the License and Health Committee meeting that took place on March 26th at 6:00 P.M. No representatives of Vani's Kitchen appeared at the meeting or had made contact with the Committee prior to the meeting.
9. That the registered contact information is no longer in service or accepting any phone calls.
10. That Vani's Kitchen has not conducted its licensed business at the licensed premises for more than 30 consecutive days.
11. That the conduct of Vani's Kitchen Inc. substantially relates to the licensed activities and is contrary to West Allis Revised Municipal Code Sections 9.02(9)(c), 9.02(12)(b), 9.02(12)(d), and 9.02(20)(a)4, and is contrary to the provisions of Chapter 125, Wis. Stats., specifically Wis. Stat. Sec. 125.12(2)(ag)1 for failure to comply with statutory and municipal regulations; and that the conduct of Vani's Kitchen, Inc. is grounds for non-renewal, suspension, or revocation of its Class "B" Fermented Malt Beverage License, Class C Wine License.

WHEREFORE, Michael J. Czaplewski, requests that Vani's Kitchen, Inc., c/o agent Vigneshwar Bhadharla, 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 "B" Fermented Malt Beverage License and Class C Wine License should be revoked, suspended, or not renewed.

Dated at this 18 day of April, 2019.

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

Subscribed and sworn to before me
this 18 day of April, 2019.


(NICHOLAS S. CERWIN)
Notary Public, State of Wisconsin
My Commission expires: PERMANENT

