

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

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**In the Matter of the  
Complaint Against**

**COMPLAINT**

**Bechers Corner Spot, LLC,  
c/o registered agent Charline Hart,  
d/b/a The Corner Spot**

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

Charles Padgett and Daniel Koralewski, being duly sworn, on oath deposes and states as a complaint against Bechers Corner Spot, LLC as follows:

1. That Charles Padgett is a resident of the City of West Allis and is the Chief of Police of the City of West Allis; Daniel Koralewski is employed by the City of West Allis as an environmentalist and acts in stead of Health Commissioner Sally Nusslock when she is absent from the office.
2. That the information contained in this complaint comes from the complainants' review of official records maintained by the City of West Allis, which records complainants believe to be reliable and accurate.
3. That Bechers Corner Spot, LLC is the holder of Class "A" Fermented Malt Beverage License Number 15-2199 and Cigarette and Tobacco Products License Number 15-2230, issued by the West Allis Common Council for the license period beginning July 1, 2015, and ending June 30, 2016, for the premises located at 2079 South 69<sup>th</sup> Street, West Allis, Wisconsin.
4. That Bechers Corner Spot, LLC is the holder of a Food-Related Permit, issued by the West Allis Health Department for the license period beginning July 1, 2015, and

ending June 30, 2016, for the premises located at 2079 South 69<sup>th</sup> Street, West Allis, Wisconsin.

5. That Bechers Corner Spot, LLC does business under the trade name “The Corner Spot.”
6. That Charline Hart is the registered agent of Bechers Corner Spot, LLC and is the agent for its beer and cigarette licenses.
7. That in addition to Hart, Michael Jonas, Jared Jonas, and Chantell Ritz are employed and/or do business for the company.
8. That due to complaints of drug activity and purchases of stolen property arising from the premises, several law enforcement agencies conducted a joint investigation into the activities at Bechers Corner Spot, LLC.
9. That based on the complainants’ training and experience, the complainant knows that WIC is a nutrition program for women, infants, and children that allows pregnant women and new mothers to buy healthy foods and formula for their babies. The Wisconsin Department of Health Services (hereinafter “DHS”) issues checks to eligible participants, and the participants can then purchase approved items from a store using the checks. Once the eligible items have been purchased, the checks then are remitted by the store to DHS for payment.
10. That Chief Padgett is aware of fraud schemes where stores will purchase WIC checks from customers for cash and then remit the checks to DHS for payment on the full value.
11. That the law enforcement investigation revealed that on the following occasions, Bechers Corner Spot, LLC employees/associates purchased WIC checks from an informant for cash on the 2079 South 69<sup>th</sup> Street premises, contrary to Wis. Stat. § 253.06(4)(a)(2):

- a. 2/25/2015: Jared Jonas paid \$60.00 cash for three WIC checks;
- b. 2/26/2015: Michael Jonas paid \$30.00 cash for five WIC checks;
- c. 3/11/2015: Michael Jonas paid \$67.50 cash and a pack of cigarettes for three WIC checks;
- d. 3/27/2015: Chantell Ritz paid \$25.00 cash for five WIC checks;
- e. 4/9/2015: Jared Jonas paid \$71.00 cash and 2 packs of cigarettes for five WIC checks;
- f. 5/5/2015: Chantell Ritz paid \$25.00 cash for five WIC checks.

12. That the investigation revealed that Bechers Corner Spot, LLC purchased baby formula from an informant for cash on the following occasions:

- a. 5/11/2015: Chantell Ritz purchased five cans of baby formula for \$40.00 on the 2079 South 69<sup>th</sup> Street premises and advised the informant that the business will purchase baby formula for \$8.00 per container;
- b. 5/29/2015: Jared Jonas purchased 30 cases (240 cans) of baby formula from an informant for \$960.00 cash and \$480.00 in a signed business check from Bechers Corner Spot, LLC;
- c. 6/5/2015: Jared Jonas purchased 30 cases (240 cans) of baby formula for \$1000 cash from an informant; approximately, two hours later, while on the premises at 2079 South 69<sup>th</sup> Street, Jared Jonas gave the additional cash for the formula to the informant.
- d. 6/22/2015: Michael Jonas purchased 60 cases of baby formula from an informant for \$1,540 cash and a \$1,340 check from Bechers Corner Spot, LLC at 6767 W. Greenfield Ave.

13. That Chantell Ritz told officers that she purchased baby formula and Red Bull products from people inside the store at least two times a day and observed Michael and Jared

Jonas purchasing products that people brought into the store. Ritz stated that approximately 90 percent of the customers were drug addicts who came into the store to sell products that she believed were stolen.

14. That Jared Jonas admitted to purchasing Quest cards and WIC checks from people for cash and admitted that the products people brought into the store were stolen. He further believed that the baby formula purchased from the informant was stolen.
15. That several law enforcement agencies executed a search warrant at Bechers Corner Spot, LLC on June 24, 2015.
16. That the search warrant investigation revealed that Wisconsin Department of Revenue Agent Georgeann King found six packs of Newport cigarettes that had the tax stamp removed and eight packs of Newport cigarettes that possessed a State of Missouri tax stamp, contrary to Wis. Stat. § 139.321(1).
17. That Jared Jonas admitted to Agent King that Michael Jonas sometimes purchases cigarettes from Pick-n-Save rather than a wholesaler. Agent King found 25 Pick-n-Save receipts in the store, ranging from 2/23/15 to 6/18/15, for the purchase of cigarettes. Purchasing cigarettes from a non-wholesaler is in violation of Wis. Stat. § 139.321(2).
18. That Bechers Corner Spot, LLC had changed its name from Beechers Quick Stop Shop LLC and Beechers Quick Stop Spot, LLC in 2014 and 2015. The City-issued licenses were in the name of Beechers Quick Stop Spot, LLC. However, Beechers Quick Stop Spot, LLC had its seller's permit revoked on 4/30/2015 and therefore could not operate as a seller, per Wis. Stat. § 77.52(12).
19. That despite not having a beer license in the name of Bechers Corner Spot, LLC, Agent King discovered an invoice from Beechwood Distributors that indicated that Bechers Corner Spot, LLC was the purchaser of the beer inside the store, contrary to Wis. Stat. § 125.32(2)(m)(a).

20. That due to the violations, Agent King seized the beer inventory and cigarette and tobacco products.
21. That on July 20, 2015, an inspection of the premises by the West Allis Health Department revealed that Bechers Corner Spot, LLC was operating without a valid food-related permit since July 1, 2015, contrary to West Allis Revised Municipal Code Section 7.04(3).
22. That the conduct of Bechers Corner Spot, LLC is contrary to West Allis Revised Municipal Code Sections 7.04(3), 9.02(12)(d), Wis. Stat. §§ 77.52(12), 125.32(2m)(a); 139.321(1), 139.321(2), 253.06(4)(a)(2), and 943.34(1); substantially relates to the licensed/permitted activity; and is grounds for non-renewal, suspension, or revocation of its Class “A” Fermented Malt Beverage License, Cigarette and Tobacco Products License, and Food-Related Permit/License.
23. **WHEREFORE**, Charles Padgett and Daniel Koralewski request that Bechers Corner Spot, LLC, c/o registered agent Charline Hart, 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” Fermented Malt Beverage License, Cigarette and Tobacco Products License, and Food-Related Permit/License of Bechers Corner Spot, LLC should be revoked, suspended, or not renewed.

Dated this 27<sup>th</sup> day of July, 2015.

By: [Signature]  
Charles Padgett, Chief of Police

Subscribed and sworn to before me  
this 29<sup>th</sup> day of July, 2015.

[Signature]  
( Jenna Merten )  
Notary Public, State of Wisconsin  
My Commission expires: permanent

Dated this 30<sup>th</sup> day of July, 2015.

By: [Signature]  
Daniel Koralewski, Environmentalist, Deputy  
Health Commissioner

Subscribed and sworn to before me  
this 30<sup>th</sup> day of July, 2015.

[Signature]  
( Jenna Merten )  
Notary Public, State of Wisconsin  
My Commission expires: permanent