

**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 15-1984 and Class C Wine License Number 15-1985, conditionally granted by the West Allis Common Council for the license period beginning July 1, 2015, and ending June 30, 2016, for the premises located at 10535 West Greenfield Avenue, West Allis, Wisconsin and does business under the trade name “Vani’s Kitchen.”
4. That Vani’s Kitchen, Inc. is the holder of a Restaurant Permit, issued by the West

Allis Health Department for the permit period beginning July 1, 2015, and ending June 30, 2016, for the premises located at 10535 West Greenfield Avenue, West Allis, Wisconsin and does business under the trade name "Vani's Kitchen."

5. That Vigneshwar Bhadharla is the registered agent and license agent of Vani's Kitchen, Inc.
6. That on August 4, 2015, 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.
7. 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.
8. That as of March 8, 2016, Vani's Kitchen, Inc. has failed to obtain that inspection.
9. That as of March 8, 2016, Vani's Kitchen, Inc. has not provided proof of its Wisconsin Business Tax Registration Certificate to the City Clerk's office, contrary to Wis. Stat. Sec. 125.04(5)(c).
10. That on November 6, 2015, City Clerk Monica Schultz sent a letter to Bhadharla to notify him that the License and Health Committee ordered his appearance at its meeting on November 17, 2015. See attached Exhibit 1.
11. That Bhadharla failed to appear at the November 17, 2015 meeting.
12. That on November 20, 2015, City Clerk Monica Schultz sent a letter to Bhadharla to notify him that the License and Health Committee ordered his appearance at its meeting on December 1, 2015. See attached Exhibit 2.
13. That Bhadharla failed to appear at the December 1, 2015 meeting.
14. That on January 4, 2016, City Clerk Monica Schultz sent a letter to Bhadharla to notify him that the License and Health Committee ordered his appearance at its

meeting on January 26, 2016. See attached Exhibit 3.

15. That Bhadharla failed to appear at the January 26, 2016 meeting.
16. That on February 15, 2016, City Clerk Monica Schultz sent a letter to Bhadharla via certified mail to notify him that the License and Health Committee ordered his appearance at its meeting on February 23, 2016. See attached Exhibit 4.
17. That Bhadharla failed to appear at the February 23, 2016 meeting.
18. That as of March 8, 2016, Vani's Kitchen, Inc. has not conducted its licensed business at the licensed premises for more than 30 days.
19. That the conduct of Vani's Kitchen Inc. substantially relates to the licensed activities and is contrary to West Allis Revised Municipal Code Sections 7.04(14)(b), 7.04(14)(d), 9.02(6), 9.02(9)(c), 9.02(12)(b), and 9.02(12)(d), is contrary to the provisions of Chapter 125, Wis. Stats., specifically Wis. Stat. Sec. 125.04(5)(c); that Vani's Kitchen, Inc. is a habitual law offender; and 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, and its Restaurant Permit.

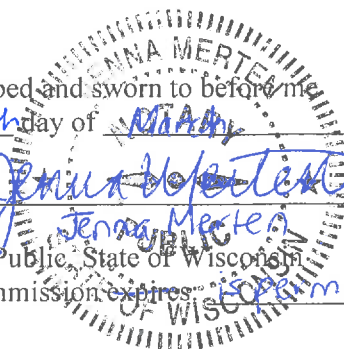
WHEREFORE, Michael J. Czaplewski, requests that Vani's Kitchen, Inc., c/o agent Vigneshwar Bhadharla, be summoned to appear before the License and Health Committee of the West Allis Common Council to answer this complaint and, if the material allegations of the complaint are denied, that a hearing be held to determine whether the "Class "B" Fermented Malt Beverage License, Class C Wine License, and Restaurant Permit of Vani's Kitchen, Inc. should be revoked, suspended, or not renewed.

Dated at this 10 day of March, 2016.

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

Subscribed and sworn to before me
this 10th day of March, 2016.

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





November 6, 2015

Vigneshwar R. Bhadharla
d/b/a Vani's Kitchen
10535 W. Greenfield Ave.
West Allis, WI 53214

OFFICE OF THE CITY CLERK

Monica Schultz
City Clerk

414/302-8220
414/302-8207 (Fax)

City Hall
7525 West Greenfield Avenue
West Allis, Wisconsin 53214

mschultz@westalliswi.gov
www.westalliswi.gov

Dear Mr. Bhadharla

The Chairman of the License & Health Committee orders that you appear at their meeting on Tuesday, November 17, 2015, at 6:00 P.M. in Room 128, West Allis City Hall, 7525 W. Greenfield Ave., regarding the status of your 2015-2016 Class B Beer and Class C Wine renewal applications for the premises located at 10535 W. Greenfield Ave., which were approved on August 4, 2015.

The Committee requested you to follow up with the Clerk's Office, regarding your Wisconsin Business Tax Registration Certificate (with the registration expiration date), Building Inspections and Neighborhood Services inspections approval and Health Department inspections approval. Contact Building Inspections and Neighborhood Services at (414) 302-8400 and/or the Health Department at (414) 302-8600 if you have questions or need to schedule inspections.

Per discussion at the License & Health Committee meeting on October 27, 2015, it is your responsibility and is part of the necessary requirements to satisfy before your license can be issued. If you satisfy these requirements and your license is issued by November 16, 2015, an appearance will not be necessary.

Please be advised that all meetings, unless otherwise noted, are open to the public and may be televised through the City's Cable Communications Division.

If you have any questions, please contact the Clerk's Office at (414) 302-8202.

Sincerely,

A handwritten signature in black ink that reads "Monica Schultz" with a small "amn" written below it.

Monica Schultz
City Clerk

/amn

cc: Mr. Vigneshwar R. Bhadharla (home address)

Exhibit I



November 20, 2015

OFFICE OF THE CITY CLERK

Monica Schultz
City Clerk

414/302-8220
414/302-8207 (Fax)

City Hall
7525 West Greenfield Avenue
West Allis, Wisconsin 53214

mschultz@westalliswi.gov
www.westalliswi.gov

Vigneshwar R. Bhadharla
d/b/a Vani's Kitchen
10535 W. Greenfield Ave.
West Allis, WI 53214

Dear Mr. Bhadharla:

The Chairman of the License & Health Committee orders that you appear at their meeting on Tuesday, December 1, 2015, at 7:30 P.M., (during recess of the Common Council Meeting), in Room 128, West Allis City Hall, 7525 W. Greenfield Ave., regarding the status of your 2015-2016 Class B Beer and Class C Wine renewal applications for the premises located at 10535 W. Greenfield Ave., which were approved on August 4, 2015.

The Committee requested you to follow up with the Clerk's Office, regarding your Wisconsin Business Tax Registration Certificate (with the registration expiration date), Building Inspections and Neighborhood Services inspections approval and Health Department inspections approval. Contact Building Inspections and Neighborhood Services at (414) 302-8400 and/or the Health Department at (414) 302-8600 if you have questions or need to schedule inspections.

Per discussion at the License & Health Committee meeting on October 27, 2015, it is your responsibility and is part of the necessary requirements to satisfy before your license can be issued. If you satisfy these requirements and your license is issued by December 1, 2015, an appearance will not be necessary.

Please be advised that all meetings, unless otherwise noted, are open to the public and may be televised through the City's Cable Communications Division.

If you have any questions, please contact the Clerk's Office at (414) 302-8202.

Sincerely,

A handwritten signature in black ink that reads "Monica Schultz" followed by a slanted line and the initials "amn".

Monica Schultz
City Clerk

/amn

cc: Mr. Vigneshwar R. Bhadharla (home address)

Exhibit 2



January 4, 2016

OFFICE OF THE CITY CLERK

Monica Schultz
City Clerk

414/302-8220
414/302-8207 (Fax)

City Hall
7525 West Greenfield Avenue
West Allis, Wisconsin 53214

mschultz@westalliswi.gov
www.westalliswi.gov

Vigneshwar R. Bhadharla
d/b/a Vani's Kitchen
10535 W. Greenfield Ave.
West Allis, WI 53214

Dear Mr. Bhadharla

The Chairman of the License & Health Committee orders that you appear at their meeting on Tuesday, January 26, 2016, at 6:00 P.M. in Room 128, West Allis City Hall, 7525 W. Greenfield Ave., regarding the status of your 2015-2016 Class B Beer and Class C Wine renewal applications for the premises located at 10535 W. Greenfield Ave., which were approved on August 4, 2015.

The Committee requested you to follow up with the Clerk's Office, regarding your Wisconsin Business Tax Registration Certificate (with the registration expiration date), Building Inspections and Neighborhood Services inspections approval and Health Department inspections approval. Contact Building Inspections and Neighborhood Services at (414) 302-8400 and/or the Health Department at (414) 302-8600 if you have questions or need to schedule inspections.

Per discussion at the License & Health Committee meeting on October 27, 2015, it is your responsibility and is part of the necessary requirements to satisfy before your license can be issued. If you satisfy these requirements and your license is issued by January 25, 2016, an appearance will not be necessary.

Please be advised that all meetings, unless otherwise noted, are open to the public and may be televised through the City's Cable Communications Division.

If you have any questions, please contact the Clerk's Office at (414) 302-8202.

Sincerely,

A handwritten signature in cursive that reads "Monica Schultz" with a small flourish at the end.

Monica Schultz
City Clerk

/amn

cc: Mr. Vigneshwar R. Bhadharla (home address)

Exhibit 3



OFFICE OF THE CITY CLERK

Monica Schultz
City Clerk

414/302-8220
414/302-8207 (Fax)

City Hall
7525 West Greenfield Avenue
West Allis, Wisconsin 53214

mschultz@westalliswi.gov
www.westalliswi.gov

VIA CERTIFIED MAIL

February 15, 2016

Vigneshwar R. Bhadharla
d/b/a Vani's Kitchen
10535 W. Greenfield Ave.
West Allis, WI 53214

Dear Mr. Bhadharla

The Chairman of the License & Health Committee orders that you appear at their meeting on Tuesday, February 23, 2016, at 6:00 P.M. in Room 128, West Allis City Hall, 7525 W. Greenfield Ave., regarding the status of your 2015-2016 Class B Beer and Class C Wine renewal applications for the premises located at 10535 W. Greenfield Ave., which were approved on August 4, 2015.

This letter serves as a second request for you to appear. Should you fail to appear as scheduled, a Summons and Complaint may be issued to suspended, revoke or nonrenewal of your Class B Beer and Class C Wine Licenses based on your nonappearances. If your licenses are issued by February 22, 2016, an appearance will not be necessary.

Please be advised that all meetings, unless otherwise noted, are open to the public and may be televised through the City's Cable Communications Division.

If you have any questions, please contact the Clerk's Office at (414) 302-8202.

Sincerely,

Monica Schultz
amn

Monica Schultz
City Clerk

/amn

cc: Mr. Vigneshwar R. Bhadharla (home address)

Exhibit 4
p. 1 of 2

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Vigneshwar Bhadharika
 3805 Woodland Trail
 Waukesha, WI 53188

2. Article Number
 (transfer from service label)

7007 2680 0000 8042 4006

PS Form 3811, July 2013

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature

[Signature]

- Agent
- Addressee

B. Received by (Printed Name)

C. Date of Delivery
 2-18-16

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type

- Certified Mail®
- Registered
- Insured Mail
- Restricted Delivery? (Extra Fee) Yes

4. Restricted Delivery? (Extra Fee) Yes

**U.S. Postal Service™
 CERTIFIED MAIL™ RECEIPT**
 (Domestic Mail Only. No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage \$	49
Certified Fee	345
Return Receipt Fee (Endorsement Required)	2.80
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 674



Sent To

Vigneshwar Bhadharika
 Street Apt. No.:
 or PO Box No. 3805 Woodland Trail
 City, State, ZIP+4 Waukesha WI 53188

PS Form 3810, August 2006

7007 2680 0000 8042 4006

Exhibit 4
 p. 2 of 2