

4. That Adi Sarkanjac is the agent appointed pursuant to Wis. Stat. § 125.04(6)(a) for license number ALC-23-8.

Incidents Subject to Complaint

Count 1: July 1st, 2023.

5. That on July 1, 2023, the first day of the current license period, West Allis Police were dispatched to Odd-E's Pub at approximately 2:22 AM regarding multiple subjects from the bar that were fighting in the street. Police arrived on the scene and began to break up the fight and further investigate the incident. Despite the police on scene, the subject in the fight continued to be argumentative, boisterous, and profane.
6. Police reported that Adi Sarkanjac, agent for Odd E's Pub, assisted police in obtaining surveillance footage which showed the fight had started within the bar when a patron threw a drink into the bartender's face. That original patron was removed from the bar and her associates were also told to leave. While removing the two associates, one of them struck a bar employee before being physically removed. Police reported that once the three aggressors had exited the bar, they were confronted by a different bar employee. This secondary confrontation apparently devolved into a physical fight in the street between all parties.
7. That police officer Lete Carlson reported that the primary offender who had originally thrown the drink and had engaged in the physical fight outside appeared to be very agitated and intoxicated during her contact with police.

Count 2: July 8, 2023.

8. That on July 8, 2023, Officer Sadvick was dispatched to Odd-E's Pub at approximately 11:30 PM for a report of an overdose. When Officer Sandvick investigated the concern, he determined that the subject in question had not overdosed on drugs but had instead consumed too much alcohol and had fallen over while at the bar. She was turned over to paramedics and transported to the hospital.

Count 3: September 10, 2023.

9. That on September 10, 2023, at approximately 1:45 AM, the West Allis Police Department was dispatched to a "shots fired" complaint at Odd-E's Pub.
10. That Officer Hayner reported that through his investigation, he learned that the shooter had been at a few bars throughout the night before ending up at Odd-E's Pub where he continued to drink more alcohol and "get drunk." Investigation revealed that the shooter eventually left the bar and as he drove away, fired shots from his handgun at the bar at least two times.
11. That Officer Sandvick obtained a copy of the surveillance video from the bar that shows a black four-door sedan turning out from 89th street onto W. Greenfield avenue. The sedan accelerated rapidly and muzzle flashes are seen firing towards Odd-E's causing a patron out front to duck and yell at the vehicle.
12. Officer Brockmann reported that he spoke with an employee the bar, identified here as O.Z. who was reportedly was outside the bar at the time of the shooting. O.Z. reported that he saw a male (later identified as the shooter) exit the bar and briefly argue with a few other males standing by their motorcycles in front of the bar. This subject then proceeded to his vehicle and drove past the bar at which time he fired at least two gunshots from his vehicle as he drove by the bar.

13. Police did catch the shooter after a brief fleeing incident and resistive episode. In the vehicle police found the firearm used in the shooting, as well as marijuana and cocaine.

Count 4: September 23, 2023.

14. That on September 23, 2023, Officer laquinta was dispatched to Odd-E's Pub at approximately 2:02 AM for a report of multiple people fighting in the roadway. Officer laquinta reported that this fight apparently was resolved prior to his arrival, but the officer did speak with the bouncer at the bar, D.A., who apparently confirmed that a fight had occurred but reported that all the problem parties had left the area before officers arrived and there was no further assistance needed.

Count 5: October 21, 2023.

15. That on October 21, 2023, West Allis Police Officers were dispatched to Odd-E's Pub at approximately 1:54 AM for a report of a shooting. Police arrived on scene and made contact with two extremely intoxicated and uncooperative parties. Police attempted to determine what had occurred and were given partial information about a shooting that took place outside the bar after a large group had been fighting within the bar.

16. Officer Schenk reported that he spoke with Odd-E's security guard, S.M. who reported that two males got into a fight within the bar and were physically thrown out of the bar.

17. Officers were able to obtain external camera footage of the incident which depicted two individuals fighting outside of the bar. One individually appears to recover a

firearm and strike the other male with the firearm several times before potentially firing a shot at the victim.

18. Officer Cooper reported that based on the police investigation, he was able to locate the individual who was believed to be the victim of the shooting, identified as D.H. D.H. was located in a residence adjoining the bar. D.H. originally denied any involvement in the altercation and Officer Cooper reported that D.H. appeared to be intoxicated at the time of his interactions. D.H. apparently did not exit his residence to continue his interaction with police and police terminated their contact at that time due to his insistence that he was not involved in an altercation.
19. Police were notified later that morning that a shooting victim had checked into a nearby hospital and was believed to be from the above incident. Officer Foy re-initiated contact with D.H. at the hospital later that same morning. D.H. was in fact shot in the leg earlier during the bar fight, although he originally denied any such involvement. D.H. continued to be uncooperative with police at the hospital and claimed to not remember much of the incident because he was "drunk" at the time.

Violations of State Law and Local Code

20. That the "Class B" intoxicating liquor license and a Class "B" fermented malt beverage license (together identified on the license as a "Class B Tavern License"), issued to ODD-E's Pub L.L.C., are subject to suspension or revocation for any of the following:

- A. Violating Wis. Stat. § 125.12(2)(ag)2 related to counts 1, 3, 4, and 5 for keeping or maintaining a disorderly or riotous, indecent or improper house

that has been the subject of several physical fights, disorderly patrons, and two separate shooting incidents within a four-month period.

B. Violating Wis. Stat. § 125.07(2)(a)(2), per Wis. Stat. § 125.12(2)(ag)1. related to counts 1, 2, 3, and 5 for selling, dispensing, or giving away alcohol beverages to a persons who are intoxicated.

21. That the Public Entertainment Permit issued to ODD-E's Pub L.L.C. is subject to suspension or revocation pursuant to West Allis Municipal Code §§ 9.51(1)b. and 9.51(1)d. because the operator has failed to maintain order on the premises and has caused a public nuisance at the property, demonstrated by the repeated bar fights, two shootings, and repeated police interactions with patrons of the bar who are apparently intoxicated based on trained officer observations.

WHEREFORE, Corporal Douglas Sayeg requests that the licensee named herein, ODD-E's Pub L.L.C., be summoned to appear before the Public Safety 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 ODD-E's Pub L.L.C. should be revoked or suspended.

Dated this 29TH day of October, 2023.

Douglas M. Sayeg
By: Douglas E. SAYEG
City of West Allis Police Department

Subscribed and sworn to before me
this 29th day of October, 2023.

Christina Porter
(Name)
Notary Public, State of Wisconsin
My Commission expires 02-25

