

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

**In the Matter of the
Complaint Against**

SUMMONS

**Gregory Steffek,
D/b/a Mugshotz
6552 West Revere Place
West Allis, Wisconsin 53219**

STATE OF WISCONSIN)
) SS.
COUNTY OF MILWAUKEE)

THE WEST ALLIS COMMON COUNCIL TO GREGORY STEFFEK:

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" Intoxicating Liquor and Class "B" Fermented Malt Beverage, Dance Hall, and Instrumental Music licenses, pursuant to the provisions of sec. 125.12, Wis. Stats.

NOW THEREFORE, you, Gregory Steffek, 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 May 17, 2011, at 7:00 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 9th day of May, 2011.

WEST ALLIS COMMON COUNCIL

By: 
Paul M. Ziehler, City Administrative Officer,
Clerk/Treasurer

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

**In the Matter of the
Complaint Against**

COMPLAINT

**Gregory Steffek,
D/b/a Mugshotz**

STATE OF WISCONSIN)
) ss.
COUNTY OF MILWAUKEE)

Michael J. Czaplewski, being duly sworn, on oath deposes and states as a complaint against Gregory Steffek 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 Gregory Steffek is the holder of "Class B" Intoxicating Liquor & Class "B" Fermented Malt Beverage License Number 1380, Dance Hall License Number 1382, and Instrumental Music License Number 1383, issued by the West Allis Common Council for the license period beginning July 1, 2010, and ending June 30, 2011, for the premises located at 1902 South 68th Street, West Allis, Wisconsin and does business under the trade name "Mugshotz."
4. That on February 10, 2011, at approximately 1:24 a.m., West Allis Police Officer Timothy Gold arrested and cited Gregory Steffek for operating while intoxicated,

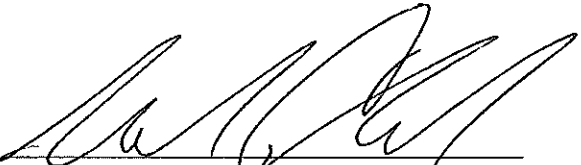
operating with a prohibited alcohol concentration, and possession of drug paraphernalia.


5. That Steffek's blood alcohol concentration was .14; the legal limit in Wisconsin for blood alcohol concentration is .08.
6. That Steffek told Officer Gold that he was coming from Mugshotz, that he had been drinking at Mugshotz since 6 p.m., and that he had consumed approximately eight beers.
7. That after placing Steffek under arrest, Officer Gold recovered from Steffek's pocket a smoking pipe that emitted a pungent odor and was charred inside.
8. That based on Officer Gold's training and experience, he recognized the pipe as one that was used for smoking marijuana.
9. That Steffek told Officer Gold that he had been smoking marijuana for the past 30 years and that there possibly could be some marijuana in his car.
10. That Officer Gold searched the vehicle and discovered a vial of hash oil in the car's middle console.
11. That Steffek was found guilty of operating while intoxicated and possession of drug paraphernalia. The operating with a prohibited alcohol concentration citation was dismissed pursuant to plea negotiations.
12. That Steffek has violated the provisions of Chapter 125, Wis. Stats. and 9.02(12)(d) of the West Allis Revised Municipal Code.
13. That Steffek's admitted use of controlled substances renders him a habitual law offender under Wis. Stat. § 125.04(5)(b), and, as such, he is not qualified to possess a Class B Tavern License, Dance Hall License, or Instrumental Music License.

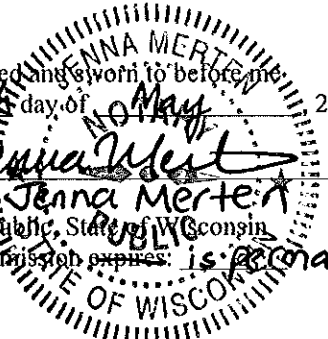
WHEREFORE, Michael J. Czaplowski requests that Gregory Steffek be summoned to

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 Tavern License, Dance Hall License, and Instrumental Music License of Gregory Steffek should be revoked, suspended, or not renewed.

Dated this 9 day of May, 2011.

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

Subscribed and sworn to before me
this 9th day of May, 2011.

(Jenna Merten)
Notary Public, State of Wisconsin
My Commission expires: is permanent



GLOJEK LIMITED

Gary A. Glojek
gglojek@glojekltd.com

Attorneys at Law
6212 West Greenfield Avenue
West Allis, Wisconsin 53214
(414) 774-3414
(414) 774-3413 FAX

Ferd A. Glojek
1937-1987

Joseph E. Redding
jredding@glojekltd.com

Stephen J. Howitz
showitz@glojekltd.com

May 17, 2011

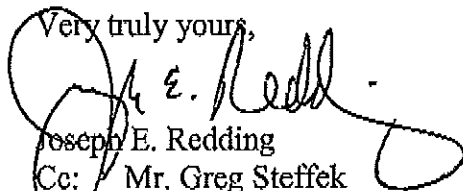
City of West Allis
License and Health Committee
7525 West Greenfield Avenue
West Allis, WI 53214

VIA FACSIMILE ONLY: 302 8207 (5 pages)

RE: In the matter of the complaint against:
Greg Steffek d/b/a Mugshotz

Dear License and Health Committee:

Enclosed please find the notice of retainer and acknowledgement of service for Greg Steffek. Additionally, enclosed please find Mr. Steffek's answer to the complaint. It is my understanding, after discussing this matter with Attorney Jenna Marten of the City of West Allis, that as a result of filing this answer neither Mr. Steffek nor I will have to appear tonight. Rather this matter will be set for a hearing and we will be notified of the hearing date. IF THIS IS INCORRECT, PLEASE LET ME KNOW IMMEDIATELY.

Very truly yours,

Joseph E. Redding
Cc: Mr. Greg Steffek
Cc: Attorney Jenna Marten

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

In the matter of the
Complaint Against

ANSWER TO COMPLAINT

Gregory Steffek
D/b/a Mugshotz
6552 West Revere Place
West Allis, WI 53219

Now comes Gregory Steffek, by his attorneys Glojek Limited, by Attorney Joseph E. Redding, to answer the complaint of the committee.

1. As to paragraph 1, admit;
2. As to paragraph 2, admit;
3. As to paragraph 3, admit;
4. As to paragraph 4, admit;
5. As to paragraph 5, admit;
6. As to paragraph 6, Steffek currently lacks sufficient knowledge to form an opinion as to the truth or falsity of the allegations and therefore deny allegations and place the City to their strictest proof;
7. As to paragraph 7, Steffek currently lacks sufficient knowledge to form an opinion as to the truth or falsity of the allegations and therefore deny allegations and place the City to their strictest proof;
8. As to paragraph 8, Steffek currently lacks sufficient knowledge to form an opinion as to the truth or falsity of the allegations and therefore deny allegations and place the City to their strictest proof;
9. As to paragraph 9, deny;

- 10. As to paragraph 10, admit;
- 11. As to paragraph 11, admit;
- 12. As to paragraph 12, deny;
- 13. As to paragraph 13, deny.

Therefore, Gregory Steffek demands a hearing before the committee under. 125.12
(2)(b) Wis. Stats. (2009-2010).

Dated this 17th day of May, 2011.

Glojek Limited
Attorneys for Defendant

By: 

Joseph E. Redding
State Bar No. 1023263
6212 West Greenfield Avenue
West Allis, WI 53214
(414) 774-3414

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

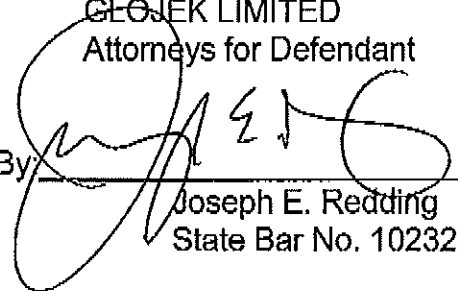
In the matter of the
Complaint Against

NOTICE OF RETAINER

Gregory Steffek
D/b/a Mugshotz
6552 West Revere Place
West Allis, WI 53219

PLEASE TAKE NOTICE that the undersigned have been retained by and appear as attorneys for the defendant, Gregory J. Steffek in the above-entitled action, and demand that a copy of all pleadings be served on the undersigned.

Dated this 17th day of May, 2011.

GLOJEK LIMITED
Attorneys for Defendant
By 
Joseph E. Redding
State Bar No. 1023263

GLOJEK LIMITED
6212 West Greenfield Avenue
West Allis, Wisconsin 53214
(414) 774-3414

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

In the matter of the
Complaint Against

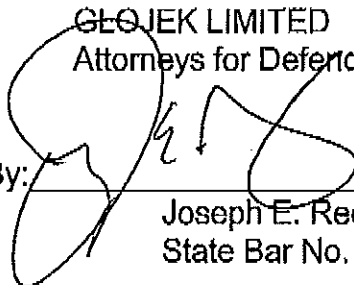
ACKNOWLEDGEMENT
OF SERVICE

Gregory Steffek
D/b/a Mugshotz
6552 West Revere Place
West Allis, WI 53219

Greg Steffek, through his attorneys, acknowledges that he was served with a
a summons and complaint in this matter in a timely fashion under section
125.12 (2)(ar) Wis. Stats. (2009-2010).

Dated this 17th day of May, 2011.

GLOJEK LIMITED
Attorneys for Defendant

By:  _____
Joseph E. Redding
State Bar No. 1023263

GLOJEK LIMITED
6212 West Greenfield Avenue
West Allis, Wisconsin 53214
(414) 774-3414