

5. The License was issued for the property located at 1022 South 60th Street, West Allis, Wisconsin (the "Premises").
6. Upon information and belief, Licensee and/or Agent has violated the following Wisconsin Statutes and municipal ordinances adopted under Wis. Stat. § 125.10.

COUNT 1 – Allowing Drug Trafficking on Premises

7. The Licensee and/or Agent knowingly allowed Martin L. Sinclair ("Sinclair") to possess a controlled substance on the Premises with the intent to distribute or deliver that controlled substance in violation of Wis. Stat. § 125.12(2)(ag)(6).
 - A. Sinclair identifies himself as the manager of the Premises.
 - B. Sinclair operates a drug trafficking organization that delivers and distributes kilogram-quantities of controlled substances, including cocaine, fentanyl, and marijuana.
 - C. Sinclair has used the Premises on numerous occasions to distribute and deliver controlled substances.
 - D. In January of 2026, the landlord for the Premises, Sam Stair of S2 Real Estate Group, LLC., contacted the Agent to inform her that West Allis police officers suspected that drug trafficking was occurring at the Premises.
 - E. The Agent, after knowing that Sinclair was distributing controlled substances at the Premises, allowed such activity to continue.

COUNT 2 – Allowing Another Person to Use License

8. The Licensee and/or Agent allowed Sinclair to use its license to sell alcohol beverages in violation of Wis. Stat. §§ 125.32(2m) and 125.04(1).

- A. Sinclair identifies himself as the manager and is the true owner of the Premises, although he is neither listed on the alcohol license application as an owner or member of Blaque Bar & Bites Corporation.
- B. Sinclair is using the license issued to Blaque Bar & Bites Corporation to sell and distribute alcohol beverages out of 1022 South 60th Street.
- C. Wis. Stat. § 125.04(1) requires that the actual owner of an establishment selling alcohol beverages possess the license in the owner's name.
- D. Sinclair is selling alcohol beverages without a license in violation of Wis. Stat. § 125.04(1).

COUNT 3 – Closing Hour Violation

- 9. The Premises remained opened past statutory closing hours in violation of Wis. Stat. § 125.32(3)(a) on June 22, 2025. At 3:28 AM on that date, patrons were present and still being served on the Premises.

COUNT 4 – Closing Hour Violation

- 10. The Premises remained opened past statutory closing hours in violation of Wis. Stat. § 125.32(3)(a) on July 25, 2024. At 2:45 AM, patrons were present on the Premises.

COUNT 5 – Closing Hour Violation

- 11. The Premises remained opened past statutory closing hours in violation of Wis. Stat. § 125.32(3)(a) on February 11, 2024. At 3:10 AM, between 45 and 60 patrons were on the Premises drinking and eating.

COUNT 6 – Multiple Noise Violations

- 12. In addition to the above Wisconsin Statutes, the Licensee and/or Agent has violated West Allis Municipal Code § 7.23 adopted under Wis. Stat. § 125.10 for excessive noise:

- A. October 1, 2025, at 11:18 PM – Loud music audible from Mineral Street.

- B. November 19, 2024, at 12:41 AM - Loud music audible from over a block away despite wind and rain.
- C. September 13, 2024, at 11:30 PM - Loud music; Agent reduced volume after contact with police.
- D. August 17, 2024, at 1:38 AM - Loud noise from music and people gathering outside.
- E. July 28, 2024, at 1:30 AM - Very loud music.
- F. July 19, 2024, at 1:43 AM - Loud music; Agent reduced volume after contact with police.
- G. July 11, 2024, at 2:20 AM - Loud music; Agent reduced volume after contact with police.
- H. July 10, 2024, at 3:11 AM - Loud music.
- I. June 17, 2024, at 2:13 AM - Loud music.
- J. May 28, 2024, at 2:23 AM - Loud music; Agent reduced volume after contact with police.
- K. May 4, 2024, at 11:15 PM Loud music; Agent reduced volume after contact with police.
- L. October 24, 2023, at 12:45 AM Loud music; Agent reduced volume after contact with police.

COUNT 7 – Serving an Intoxicated Person on Multiple Occasions

13. On multiple occasions, the Licensee and/or Agent has served an intoxicated person in violation of Wis. Stat. § 125.07(2)(a):

- A. March 18, 2026 - Driver (BAC 0.171) admitted drinking at Premises.
- B. January 8, 2026 - OWI arrest; driver reported drinking at Premises.
- C. December 29, 2025 - OWI arrest; driver drank at Premises.

- D. November 28, 2025 - OWI arrest following altercation; driver drank at Premises.
- E. October 18, 2025 - OWI arrest; individual coming from Premises.
- F. October 11, 2025 - OWI arrest; individual coming from Premises.
- G. October 2, 2025 - OWI arrest; individual coming from Premises.
- H. September 26, 2025 - OWI arrest; individual coming from Premises.
- I. June 12, 2025 - Driver asleep at wheel; admitted drinking at Premises.
- J. June 5, 2025 - OWI arrest; driver admitted drinking at Premises.
- K. May 10, 2025 - OWI arrest; occupants coming from Premises.
- L. May 1, 2025 - OWI and paraphernalia arrest; driver from Premises.
- M. April 20, 2025 - OWI arrest; driver from Premises.
- N. December 23, 2024 - Patron hospitalized for alcohol poisoning after drinking at Premises.
- O. March 14, 2024 - Highly intoxicated individual injured at Premises.
- P. November 5, 2023 - Intoxicated patron found unconscious on Premises.

COUNT 8 – Maintaining a Disorderly or Riotous, Indecent or Improper House

14. The Licensee and/or Agent maintains a disorderly or riotous, indecent or improper house in violation of Wis. Stat. § 125.12(2)(ag)(2). In addition to the numerous municipal code violations detailed in Counts 6 and 7, there have been multiple fights, drug activities, weapons violations, and disorderly behavior occurring in or around the Premises, including but not limited to:

- A. March 7, 2026 - A person intending to enter the Premises was arrested for a warrant and possession of 73 grams of marijuana.
- B. March 6, 2026 - A group of women were loudly arguing in the street and evaded contact when a responding officer attempted to speak with them.

- C. January 10, 2026 – A group of 20-25 people were in the middle of the street arguing/fighting outside of the Premises. Multiple citations issued. Eight West Allis police officers responded, as well as a West Milwaukee squad under mutual aid.
- D. January 8, 2026 - A large group of patrons from the Premises were in the middle of the road arguing at 2:10 a.m. Officers turned on squad lights and people dispersed. Officers then located a group of 5 people nearby and saw one female being dragged down by another female. All parties were uncooperative and evaded officers.
- E. January 3, 2026 - During a traffic stop in front of the Premises, three occupants all with lengthy criminal histories and many indicators of drug sales were in the vehicle. Officer located marijuana, powder cocaine, crack cocaine, a scale, and texts indicative of drug sales.
- F. October 30, 2025 - Occupants of a vehicle who intended to enter the Premises found in possession of marijuana and an illegally concealed loaded firearm.
- G. October 23, 2025 - A security guard for the Licensee fled from police from the Premises resulting in a crashed squad car before he was apprehended. He had been drinking and was in possession of a gun despite having a felony warrant for a probation violation from his armed robbery conviction. He was arrested for OWI and many other crimes.
- H. October 10, 2025 - A large group of people were fighting outside the Premises and evaded responding officers.
- I. October 9, 2025 - A group of about 20 people were fighting outside of the Premises.

- J. August 1, 2025 - Persons leaving the premises were found with marijuana and in a vehicle that was listed as stolen out of Milwaukee.
- K. June 8, 2025 - A person confronted bar staff about loud music and people drinking outside of the bar and as a result got drinks thrown in his face.
- L. April 10, 2025 - A person who had a digital scale with white powdery residue (later indicated positive for cocaine) in plain view in a vehicle entered and exited the Premises and was eventually arrested for drug paraphernalia.
- M. April 3, 2025 - Group of (8-10) people fighting outside the premises over a missing phone.
- N. February 15, 2025 - A neighbor who lives near bar reported that she arrived home and was surrounded by 30-35 bar patrons who were threatening her, calling her a bitch and a snitch.
- O. November 10, 2024 - Multiple people fighting in the street who evaded responding officers.
- P. November 4, 2024 - A person accused Sinclair and a group of women following her out of the bar, attacking her, and stealing her phone. The Agent refused to provide video from that night.
- Q. October 27, 2024 - A group of 20+ people were fighting in the street outside the Premises at 2:00 AM.
- R. October 13, 2024 - The Agent refused to provide security video to aid in an investigation about a stolen vehicle.
- S. September 8, 2024 - A fight occurred in front of the Premises at 2:53 AM. Fighting parties and vehicles fled the area upon arrival of officers. Agent refused to provide security video.

T. July 21, 2024 - Multiple parties were arrested for fighting outside of the Premises. Agent refused to provide security video of event.

WHEREFORE, the undersigned requests that the named Licensee 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 at that time to determine whether the above licenses should be revoked or suspended.

Dated this 29th day of April, 2026.

By: William C. Chaff

Subscribed and sworn to before me
this 29th day of April, 2026.

Karl Decker

(Name) Karl Decker
Notary Public, State of Wisconsin

My Commission ~~expires~~ is permanent