

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

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**In the Matter of the  
Complaint Against**

**SUMMONS**

**EKC Investments LLC  
D/B/A Kane's Bar & Grill**

**Premises Location:  
6922 W. Orchard St.  
West Allis, WI 53214**

**Agent: Ed Jones**

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

**THE WEST ALLIS COMMON COUNCIL TO EKC Investments LLC by licensing  
agent Ed Jones:**

You are hereby notified that a sworn complaint, a copy of which is attached, has been duly made and filed, requesting a hearing on suspension or revocation of the 2022-2023 "Class B" intoxicating liquor license, a Class "B" fermented malt beverage license, and a Public Entertainment Permit, all issued under license number ALC-22-1, for the premises located at 6922 W. Orchard Street in the City of West Allis, State of Wisconsin, for the license period running July 1, 2022, and expiring on June 30, 2023. This sworn complaint requesting a hearing for suspension or revocation of the above referenced licenses or permits is brought pursuant to the provision of Wis. Stat. § 125.12(2) and West Allis Code §§ 9.51, 9.60(5), and 9.76(5).

**NOW THEREFORE**, you, EKC Investments LLC by licensing agent Ed Jones, are hereby summoned to appear before the License and Health Committee of the West Allis Common Council on November 15, 2022 at 6:30 p.m., in Room 128 of the West Allis City Hall located at 7525 W. Greenfield Avenue in the City of West Allis, 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 or revoke 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 7th day of November, 2022.

WEST ALLIS COMMON COUNCIL

By: Rebecca N. Grill  
Rebecca Grill  
City Administrator and City Clerk

**WEST ALLIS COMMON COUNCIL  
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**COMPLAINT**

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

Detective Brandon Hurley of the West Allis Police Department, being duly sworn on oath, deposes and states as a complaint under Wis. Stat. § 125.12(2)(ag) against EKC Investments LLC and doing business as "Kane's Bar & Grill" as follows:

1. That the complainant is a resident of the City of West Allis.
2. That this complaint is based upon information contained within official records maintained by the City of West Allis and the City of West Allis Police Department that the complainant has used in the past and found to be reliable.
3. That EKC Investments LLC, doing business as "Kane's Bar & Grill" has been issued a "Class B" intoxicating liquor license and a Class "B" fermented malt beverage license (together identified on the license as a "Class B Tavern License"), and a Public Entertainment Permit, all issued under license number ALC-22-1, for the premises

located at 6922 W. Orchard Street in the City of West Allis, State of Wisconsin, for the license period running July 1, 2022, and expiring on June 30, 2023.

4. That Ed Jones is the agent appointed pursuant to Wis. Stat. § 125.04(6)(a) for license number ALC-22-1. Kathy Goedde is identified as a vice president of EKC Investments LLC.
5. That EKC Investments LLC first obtained a Class B Tavern and Public Entertainment license for the premises located at 6922 W. Orchard Street on February 9, 2022. This license ran from February until the end of the license period on June 30, 2022. At that time the 2022-2023 license period began under ALC-22-1. Ed Jones was the agent for that license as well.
6. That on July 2, 2022, officers were dispatched to Kane's Bar & Grill at 6922 W. Orchard Street regarding a potential overdose. Officer Roth arrived on scene and made contact with individuals at the bar. Officer Roth observed that a bar employee identified as Kathy G. had overdosed and was on the ground near the bar. The West Allis Fire Department began to render aid. The West Allis Fire Department administered Narcan, a substance used in emergency situations to help reverse the effects of an opioid overdose, which was effective and Kathy G. became responsive. Kathy G. denied taking any illegal substance, despite Officer Schrandt explaining that Narcan only works to counteract opiates.

Officer Roth identified a second employee, Chad H., that appeared to be under the influence of some type of drug. Chad H. originally told officer Roth that Kathy G. had gone outside with an unknown male before the overdose event occurred. Chad H. was confronted about his impairment. He stated that he did not use drugs with his

boss, Kathy G. Chad H. also admitted that he had some “leftover” cocaine on his person. The substance found on his person was described as a white chunky substance, weight of approximately .94 grams. Sergeant Clint Corwin tested that substance using the Nark II (07) Scott Reagent Modified Field Test. The substance tested positive as cocaine base (cocaine).

Two other employees on scene, M.N. and K.P. advised that approximately 15 minutes before the overdose event, they observed Chad H. and Kathy G. go outside for a smoke break. The two remained outside for a period of time and upon returning inside the bar, both were sweating profusely and Kathy G. began to show signs of overdosing.

7. That the above incident occurred exactly ten (10) days after an incident involving the recovery of a firearm and a substantial quantity of drugs, including cocaine, was found in the basement of Limanski’s Pub, another bar that is owned and managed by Kathy Goedde.
8. That police have had other contacts at the property since EKC Investments LLC began to utilize the alcohol license for the premises.
  - A. On March 13, 2022, police conducted a tavern check of the premises and identified that the tavern license was not on display as required by Wis. Stat. 125.04(10)(b).
  - B. Police were also dispatched to the location multiple times between March 26, 2022, through September 24, 2022, for noise complaints and other disturbances from employees or former employees. Those complaints were as follows:

- i. March 26, 2022- Noise complaint identified by a 3<sup>rd</sup> party. Police were not able to confirm the noise violation and no action was taken by police at that time.
- ii. May 15, 2022- Noise complaint identified by a 3<sup>rd</sup> party. Police went to the scene and observed the violation. Police asked employees to close the doors.
- iii. May 20, 2022- Noise complaint identified by 3<sup>rd</sup> party. Police were not able to independently confirm so no action taken by police.
- iv. May 26, 2022- Noise complaint observed although determined not to be loud enough to cause a disturbance at the time officer arrived. Employee stated that someone had the door open briefly but they will continue to keep door closed to avoid issue in future.
- v. September 3, 2022- Noise complaint identified by a 3<sup>rd</sup> party regarding loud music. Police dispatched but could not independently confirm. No action taken by police at that time.
- vi. September 18, 2022- Current employees contacted police about a former employee, Cassie, banging on the back door and scaring current employees. After the initial call, police were unable to make contact with any individuals involved.
- vii. September 24, 2022- Noise complaint regarding loud music and the doors of the bar being open. Police attempted to contact the bar via telephone but there was no answer. The owner of the bar was contacted and indicated he would handle the matter.



9. That pursuant to Wis. Stat. §125.12(2) any license issued under Wis. Stat. Ch. 125 is subject to suspension or revocation for any of the following:
- A. Violating Wis. Stat. § 125.04(10)(b), per Wis. Stat. § 125.12(2)(ag)1. for failure to display the license;
  - B. Keeping or maintaining a disorderly or riotous, indecent or improper house in violation of Wis. Stat. § 125.12(2)(ag)2.; and
  - C. Knowingly allowing another person or employee on the premises who possesses with the intent to distribute or deliver a controlled substance or controlled substance analog in violation of Wis. Stat. § 125.12(2)(ag)6.
10. That pursuant to West Allis Municipal Code §§ 9.51b. and 9.51d. the Public Entertainment Permit is subject to suspension or revocation when the operator has failed to maintain order on the premises and has caused a public nuisance at the property, demonstrated by the noise complaints and more pressingly by employees using and sharing controlled substances at the premises.

**WHEREFORE**, Detective Brandon Hurley requests that the licensees named herein, EKC Investments LLC, 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 licenses and permits issued to EKC Investments LLC, should be revoked or suspended.

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Dated this 1<sup>st</sup> day of November, 2022.

By: Det. B. Hurley, #66

Print Name: Det. B. Hurley, #66  
City of West Allis Police Department

Subscribed and sworn to before me  
this 1 day of November, 2022.

Nicholas S. Cerwin  
(Nicholas S. Cerwin)  
Notary Public, State of Wisconsin  
My Commission expires: Permanent

