

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

**In the Matter of the
Complaint Against**

COMPLAINT

**Wisconsin Beverage and Entertainment Partners, LLC,
d/b/a 7-West Bistro and Ultra Lounge,
Ana Brown, registered agent,
Edward A. Brown, Jr., license agent,**

STATE OF WISCONSIN)
) ss.
COUNTY OF MILWAUKEE)

Michael J. Czaplewski, being duly sworn, on oath deposes and states as a complaint against Wisconsin Beverage and Entertainment Partners, LLC 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, which records complainant believes to be reliable and accurate.
3. That Wisconsin Beverage and Entertainment Partners, LLC is the holder of "Class B" Intoxicating Liquor & Class "B" Fermented Malt Beverage License Number 15-2139, Tavern Entertainment License Number 15-2198, and Dance Hall License Number 15-2140, issued by the West Allis Common Council for the license period beginning July 1, 2015, and ending June 30, 2016, for the premises located at 7211 West Greenfield Avenue, West Allis, Wisconsin and does business under the trade name "7-West Bistro and Ultra Lounge."

4. That Wisconsin Beverage and Entertainment Partners, LLC 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 7211 West Greenfield Avenue, West Allis, Wisconsin and does business under the trade name "7-West Bistro and Ultra Lounge."
5. That Edward A. Brown, Jr. is the agent of Wisconsin Beverage and Entertainment Partners, LLC's above-referenced licenses and permits.
6. That Ana Brown is the registered agent for Wisconsin Beverage and Entertainment Partners, LLC.
7. That on January 26, 2016, investigation revealed that Wisconsin Beverage and Entertainment Partners, LLC no longer possessed a valid lease to 7211 West Greenfield Avenue, and, therefore, no longer possesses a right to the premises.
8. That on December 22, 2014, West Allis police officers responded to a trouble call at 7-West Bistro for parties fighting on the street. Investigation revealed that a nearby resident was inside his residence when he observed several people yelling and arguing in front of the bar and one man punching bar patron Aaron Gray. Officers located Gray outside the bar and noted that he was highly intoxicated. Gray admitted to being present in 7-West Bistro. Gray was arrested for disorderly conduct.
9. That on May 17, 2015, West Allis police officers were dispatched to 7211 West Greenfield Avenue for a report of 15-20 people displaying weapons and jumping on vehicles. Investigation revealed that three underage women were at 7-West Bistro for a birthday party for an underage person and were present inside the tavern while alcohol was being served to other patrons. The three underage women fought with officers and were arrested for disorderly conduct and resisting arrest. Neither Edward Brown, Jr. nor Ana Brown notified the Police Chief that underage persons

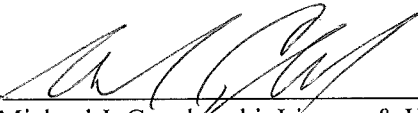
were to be on the premises, and the tavern did not comply with the regulations associated with having underage persons on the premises.

10. That on September 15, 2015, a confidential informant purchased heroin from Giovannie Freeman inside 7-West Bistro. The informant stated that Freeman and Thomas Brown, who was present during the sale, had identified themselves as the owners of the tavern. A review of their social media sites indicated numerous references to the tavern, pictures of them smoking marijuana, and pictures of marijuana buds and large amounts of money. Surveillance on that same date revealed that Freeman arrived at the tavern in a vehicle registered to Ana Brown.
11. That on December 17, 2015, police officers executed a search warrant at Thomas and Ana Brown's residence. Investigation revealed that Ana Brown was smoking a marijuana blunt when the police arrived and admitted to smoking marijuana. She further admitted that Freeman had helped out at 7-West Bistro. Police officers recovered marijuana in her home, along with several documents related to the tavern.
12. That on January 15, 2016, City Clerk Monica Schultz sent a letter to Edward A. Brown, Jr. to notify him that the License and Health Committee ordered his appearance at its meeting on January 26, 2016. See attached Exhibit 1.
13. That Edward A. Brown, Jr. failed to appear at the January 26, 2016 meeting.
14. That Wisconsin Beverage and Entertainment Partners, LLC has violated the provisions of Chapter 125, Wis. Stats., including Wis. Stat. §§ 125.07(3)(a); and sections 7.04(14)(d), 9.02(4)(a), 9.02(12)(b), 9.02(12)(c), 9.02(12)(d), and 9.02(22)(a) of the West Allis Revised Municipal Code; has lost the right to occupy the premises listed on the licenses/permits; and keeps or maintains a disorderly or improper house. Its conduct substantially relates to the licensed/permitted activity; and the conduct is grounds for non-renewal, suspension, or revocation of its "Class

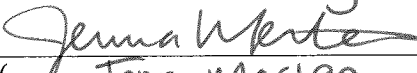
B” Intoxicating Liquor License, Class “B” Fermented Malt Beverage License,
Tavern Entertainment License, Dance Hall License, and Restaurant License.

WHEREFORE, Michael J. Czaplewski requests that Wisconsin Beverage and Entertainment Partners, 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 “Class B” Intoxicating Liquor License, Class “B” Fermented Malt Beverage License, Tavern Entertainment License, Dance Hall License, and Restaurant License should be revoked, suspended, or not renewed.

Dated this 15 day of FEBRUARY, 2016.

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

Subscribed and sworn to before me
this 15th day of February, 2016.


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



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

January 15, 2016

Edward A. Brown, Jr., Agent
7-West Bistro & Ultra Lounge
7211 W. Greenfield Ave.
West Allis, WI 53214

Dear Mr. Brown:

The Chairman of the License & Health Committee orders that you appear at their meeting on Tuesday, January 26, 2016, at 6:00 PM, in Room 128, West Allis City Hall, 7525 W. Greenfield Ave., regarding an incident, which was reported to us on January 11, 2016.

A copy of the incident report is being sent to your home address.

Please be advised that all meetings, unless otherwise noted, are open to the public and may be televised and recorded 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" followed by a small flourish.

Monica Schultz
City Clerk

/amn

cc: Edward A. Brown, Jr. (home enclosure)
Suzanne Ball (property owner no enclosure)

Exhibit. 7