

CHAIR

- Licenses Committee

MEMBER

- Community and Economic Development Committee
- Steering and Rules Committee



TONY ZIELINSKI
ALDERMAN, 14TH DISTRICT

December 13, 2013

To the Honorable, the Common Council

Dear Members:

Re: Common Council File Number 130965

Attached are written objections to file number 130965, Motion relating to the recommendations of the Licenses Committee relative to licenses, relating to a recommendation of non-renewal of the Class "B" Tavern and Public Entertainment Premises licenses of Kanisha T. King-Gray for the premises at 2579 N. Teutonia Ave. ("Club 30") in the 15th aldermanic district.

This matter will be heard by the full Council at its Tuesday, December 17, 2013 meeting. Pursuant to City Ordinances, a roll call vote will be taken to confirm that all members have read the attached statement and materials.

Respectfully,

A handwritten signature in black ink that reads 'Tony Zielinski'.

Tony Zielinski, Chair
Licenses Committee

cc: All Council Members
City Attorney's Office
Common Council/City Clerk – License Division
CCF 130965





JAMES E. TORAN

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December 10, 2013

James R. Owczarski
City Hall Room 205
200 E. Wells Street
Milwaukee, WI 53202

Milwaukee Common Council
City Hall Third Floor
200 E. Wells Street
Milwaukee, WI 53202

Re: Written objections to report of The Licenses Committee for the Renewal Application of Kanisha T. King-Gray for a Class "B" Tavern and Public Entertainment Premises license for the premises located at 2579 North Teutonia Avenue in the City and County of Milwaukee, Wisconsin ("Club 30").

Dear Milwaukee Common Council:

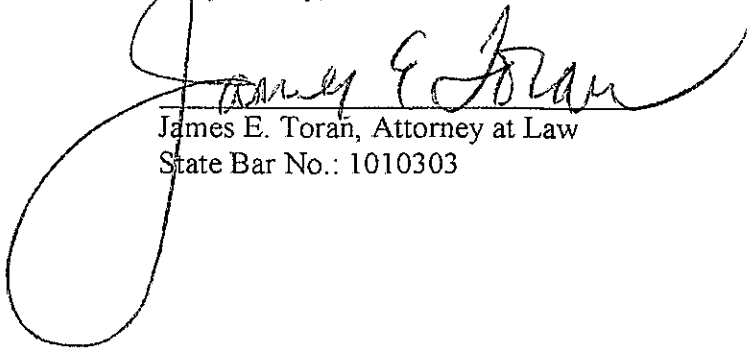
Please be advised that Kanisha T. King-Gray, herein files written objections to the report of The Licenses Committee as follows:

1. Admit.
2. Admit.
3. Admit.
4. Admit.
5.
 - A. We deny the explanations of the MPD. We deny having been contacted. We deny having knowledge of the incident on September 24, 2012.
 - B. We affirmatively deny that this incident occurred at 1:52 a.m. and there were not security personnel outside. We were not aware of any incident that may have occurred inside or outside the bar on the date in question. We take appropriate steps to safe guard patrons both inside and outside of our establishment.
 - C. On January 6, 2013, Andrew Werner was on mobile patrol. I question the reliability of the statement attributed to him by the MPD. The alleged shots that were fired from the 1300 block of west Clark Street were not directly or indirectly related to patrons from Club 30 Grill and Lounge.

- D. On January 14, 2013 we dispute that there was a message left on Kanisha King-Gray's phone. The MPD allege could reach not reach Ms King-Gray at either number. On January 6, 2013 they left a message. The police found no underage persons or illegal drug use on the date in question.
- E. Both MPD and HIDTA utilized CI to conduct an undercover investigation. The allegations made by the alleged CI were not supported by any surveillance equipment. We affirmatively deny the blatantly false assertions made by the two CI's. These are purely hearsay statements e.g. observing a patron with a .22 caliber. Patrons receiving oral sex and placing fingers in dancer's vagina. CI's had cameras on their persons. None of which support these allegations.
- F. Anonymous caller which was unsubstantiated.
- G. There was no evidence of the CI's assertion. Video surveillance with no substantiation. Alleged incident occurred on March 4, 2013. There were no citations written until October 9, 2013. These citations are pending. No dancers were ever cited. No names of dancers were ever taken. These citations were issued due to failure of licensee to accept an offer made by both City Attorney and MPD.
- H. We affirmatively deny these allegations. The CI was conducting video surveillance. That was visual and audible. There was no support of their hearsay statements which are inflammatory and shocks the consciousness of any good citizen.
- I. On March 12, 2013, there was no notification by any patron that their purse was either lost or stolen. We have no knowledge of this incident.
- J. These were not patrons of Club 30 Grill and Lounge.
- K. On March 31, 2013, there was an unknown male that was not admitted to Club 30 Grill and Lounge. He fought with one of the patrons outside of the club at approximately 1:20 a.m. due to a disagreement that occurred on a different date. Club 30 Grill and Lounge paid the citation.
- L. The photos incorporated herein specifically dated December 5, 2012, December 12, 2012, and December 19, 2012. All of the photos were attributed to 2012 licensing year. The current licensing year December 21 to December 20th 2013. The license was renewed without objection in 2012.
- M. That was a domestic dispute between the patron and her boyfriend. Club 30 Grill and Lounge is not responsible for domestic disputes.

- N. Admit.
- O. Admit.
- P. Admit.
- Q. Citation was issued on October 9, 2013 the alleged incident occurred on June 24, 2013. Neither licensee nor dancers were issued citations at time of alleged violation.
- R. Policy is that 1:30 a.m. lights are on and music was turned off. All patrons are out of the building by 1:45 a.m. We dispute this allegation. Incident occurred on July 1st, and citation issued on October 9, 2013. No dancer was cited for costume violation at that time.
- S. On July 15, 2013, we deny the allegations made by CI regarding video and audio recording of security shining a light on a dancer who was not covered with a costume. Citations were issued on October 9, 2013 after settlement agreement could not be reached.
- T. The liquor invoiced on premises is subject to a 2 year reporting requirements. The liquor in question was outside of the 2 year date.
- U. We deny that there were agents from the Department of Revenue. On July 26, 2013 there was one inspector from neighborhood services and the 3 officers from MPD.
- V. Club 30 Grill and Lounge was not open.
- W. Admit. Clerical error.

Respectfully,


James E. Toran, Attorney at Law
State Bar No.: 1010303