



**JAMES N. WITKOWIAK**  
ALDERMAN, 12TH DISTRICT

May 8, 2006

To the Honorable, the Common Council

Dear Members:

Re: Common Council File 051652

Attached are written objections to the recommendation of the Licenses Committee for non-renewal, based on neighborhood objections, of the Extended Hours Establishment license of Mandeep Dhawan, Agent for "Youvraj Group, LLP", for "Mobile Gas Station" at 714 N. 27<sup>th</sup> St. in the 4<sup>th</sup> aldermanic district

This matter will be heard by the full Council at its May 9, 2006 meeting. Pursuant to City Ordinances, a roll call vote will be taken to confirm that all members have read the attached objections.

Respectfully,

A handwritten signature in black ink, appearing to read "James N. Witkowiak", written over a circular stamp or seal.

James N. Witkowiak, Chair  
Licenses Committee

cc: All Council Members  
City Attorney's Office  
Common Council/City Clerk -- License Division  
CCF 051652



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**DAVID C. BANGERT**  
*Attorney At Law*

May 5, 2006

Office of the City Clerk  
City of Milwaukee  
Room 205, City Hall  
200 East Wells Street  
Milwaukee, WI 53202-3567

CITY OF MILWAUKEE  
05 MAY - 8 AM 10:47  
RONALD D. LEONHARDT  
CITY CLERK

Re: Mandeep Dhawan, Agent for Youvraj Group, LLP  
(Extended Hours Establishment Renewal Application for "Mobil Gas  
Station," 714 North 27<sup>th</sup> Street)

Dear Sirs/Madams:

This letter is intended to serve as the applicant's written objection to the Report of the Licenses Committee recommending that the Extended Hours Establishment application by Mandeep Dhawan, agent for Youvraj Group, LLP for the premises at 714 North 27<sup>th</sup> Street, Milwaukee, Wisconsin ("Mobile Gas Station"), not be renewed based upon neighborhood objections.

Mandeep Dhawan objects to the Conclusions of Law and the Recommendation of the Licenses Committee on the basis that there has not been a finding that the applicant/business is in any way a "cause" of the activities that certain neighbors object to. It has not in fact been established that the applicant/gas station business is a contributing factor to the objectionable activities.

Mr. Dhawan agrees that extensive panhandling as well as other objectionable activities occur frequently in the vicinity of his gas station business as well in the area surrounding his business. It is a problem that exists throughout the neighborhood, but Mr. Dhawan submits that the problems are worse in the vicinity of his gas station because larger groupings of people congregate in the area surrounding the gas station. The gas station is located on the northeast corner of North 27<sup>th</sup> Street and West Wisconsin Avenue. There is a bus stop on each of the four corners of North 27<sup>th</sup> Street and West Wisconsin Avenue, and it is a reality that there are usually people congregated at the bus stops throughout all hours of each day and night. This fact – as well as the fact that business is being conducted at the gas station business – seems to attract the panhandlers and those practicing other undesirable activities to the North 27<sup>th</sup> Street and West Wisconsin Avenue Area.

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Mr. Dhawan and his business group have improved the exterior lighting surrounding the Mobil Gas Station within the past three months and they have had additional security cameras installed outside the gas station within the past month. The applicant has always had "No Loitering" signs on the gas station premises, and Mr. Dhawan recently put up two more prominently displayed signs admonishing "No Panhandling, No Loitering & No Littering!"

The applicant and his employees have always tried to "chase off" panhandlers and other undesirable individuals. When the individuals cannot be "chased off," Mr. Dhawan or his employees call the police. Police records show that employees of the Mobil Gas Station called them for assistance 46 times from the beginning of February through April 17, 2006.

Mr. Dhawan objects to the Conclusion of Law #2 which asserts that he/the licensee "allowed" the objectionable activities to occur in the vicinity of his business premises. On the contrary, he and his employees have made strong efforts to discourage such activities.

The Committee's third Conclusion of Law states that the Extended Hours Establishment license held by Mandeep Dhawan, agent for "Youvraj Group, LLP" should not be renewed "because of the dangers the activities attendant to the licensed premises represent to the health, safety and welfare of the citizens of the City of Milwaukee." Mr. Dhawan submits that it is likely that the objectionable activities are in fact curtailed to some extent due to the fact that the business' lights -- including extensive exterior lights -- are on throughout the night and one or more employees are present at the business premises. The Common Council must consider whether the situation will be made better or worse if the business is closed and the lights are turned off from 12:00 a.m. to 5:00 a.m.

Sincerely,



David C. Bangert  
Attorney for Youvraj Group, LLC

DCB/mn

cc: Mandeep Dhawan  
Youvraj Group, LLP