

In re the Class "B" Tavern, Cigarette and Tobacco, Food Dealer – Restaurant, Sidewalk Dining Facility and Public Entertainment Premises licenses of:

A1 Waterstreet, LLC
Rajvir S. Bains, Agent
as the Licensee for the licensed premises
known as Elmnt Lounge, located at
618 N. Water St., Milwaukee, Wisconsin 53202

SWORN CHARGES BY CHIEF OF POLICE FOR REVOCATION OF LICENSES

Pursuant to Wisconsin Statutes § 125.12 and Milwaukee Code of Ordinances ("MCO"), §§ 85-4, 85-27, 90-12 and 108-11, Chief of Police Jeffrey Norman, a City of Milwaukee resident and interested party, by Captain Robert Thiel of Police District 1, an interested party, being first duly sworn and upon his oath, respectfully charges the following based upon review of official Milwaukee Police Department ("MPD") reports drafted in the ordinary course of business, review of documents received by MPD District 1 and communication with other law enforcement, municipal officials and individuals with information:

REVOCATION STANDARDS

MCO § 85-4-1.5 requires all issued licenses to be heard for revocation at the same time. MCO § 85-27 grants the discretion to revoke any MCO ch. 85 license for any improper conduct of the licensed person. MCO § 85-4-4 provides grounds for revocation including:

- Failing to meet municipal qualifications.
- Pending charges or convictions of any level and type of offense which substantially relate to the circumstances of the particular licensed or permitted activity.
- Whether the licensed premises facilitates a public or private nuisance.
- Whether the premises facilitates congregations of people that have resulted in failing to comply with the approved plan of operation or has otherwise demonstrated any factor

which reasonably relates to the public health, safety and welfare.

A public entertainment premises follows the same MCO § 85-4-4 factors. MCO § 108-11-3.

MCO ch. 90 contains many similar factors, but also additional and different grounds for revocation. MCO § 90-2 adopts Wis. ch. 125. MCO § 90-12-3 also adopts state law revocation provisions. Grounds for revoking an alcohol license may include:

- The licensee has violated any state law or city ordinance prohibiting the sale of intoxicants to intoxicated people.
- The licensee has violated any state law or city ordinance prohibiting the sale of intoxicants people bordering on the state of intoxication.
- The licensee corporation does not have a natural person as an agent who meets the professional character requirements of MCO § 90-6-1-a.
- A responsible person is not on premises pursuant to MCO § 90-8.
- A person allows another to use their license to sell alcohol beverages.
- Gambling, gaming for money/valuable, drunkenness or disorderly conduct on the premises.
- The licensed premises is operated in a such a manner that it constitutes a public or private nuisance.
- The licensed premises is operated in such a manner that it has a substantial adverse effect upon the health, safety or convenience and prosperity of the immediate neighborhood.
- Failure of the licensee to operate the premise in accordance with the plan of operation.
- Any other reasonable cause which shall be in the best interests and good order of the city.

MCO § 90-12-1.

LOCATION AND APPLICATION HISTORY

1. Elmnt Lounge has been the business name for the licensed premises at this location dating back to 2018 when the building was renovated. (Exhibit A).

2. Department of Neighborhood Services capacity for the business is 480 people.

3. Elmnt Lounge originally obtained licenses through MKE Water Street LLC. MKE Water Street LLC maintained documents with the Wisconsin Department of Financial Institutions that identified Habib Manjee as the organizer, sole member and registered agent of this LLC.

4. A1 Waterstreet LLC applied for licenses for this location and business. They were granted licenses on May 29, 2025. This LLC maintained documents with the Wisconsin Department of Financial Institutions that identified Rajvir Bains as the owner and registered agent as of December 2, 2024.

5. Nicholas Murado has been identified as the director of operations, manager and/or licensed agent for Elmnt Lounge dating back to 2018. Mr. Murado is currently identified as the manager of Elmnt Lounge.

6. The current plan of operations for Elmnt Lounge under A1 Waterstreet LLC mirrored the former plan of operations for Elmnt under MKE Water Street LLC, (selections from the 2021 application are attached as Exhibit B and selections from the current application are attached as Exhibit C).

7. Elmnt Lounge, under MKE Water Street LLC, received a 60-day suspension in 2021 after events that included a fatal shooting associated with the licensed premises the morning of July 17, 2021. (Exhibit D).

CONDUCT ASSOCIATED WITH ELMNT LOUNGE THIS LICENSING PERIOD

8. The above-recited paragraphs and exhibits are realleged in this section and are incorporated by reference.

June 15, 2025 Shooting

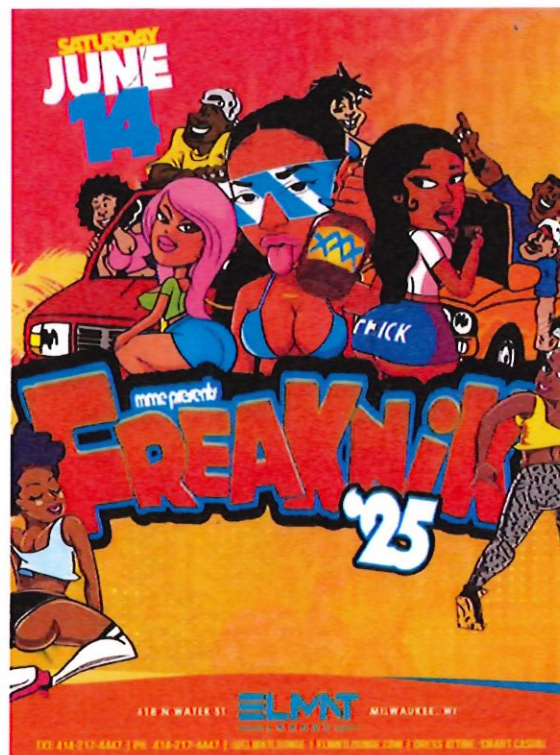
9. Police responded to the first level of the parking structure at 525 N. Water St. on

June 15, 2025, at 3:55 a.m. regarding a shooting. One casing was found on scene and an individual suffered one gunshot wound to the buttocks.

10. Detective William del Moral spoke with J.X.G. regarding this incident and they stated that they were at Elmnt Lounge until closing time. After the club closed, numerous unidentified individuals gathered at the entry/exit level of the parking structure at 525 N. Water St.

11. Detective William del Moral spoke with D.N.A-F. who stated that they were at Elmnt Lounge until closing time. The club closed and they walked with numerous unidentified individuals to the parking ramp. This practice was referred to as “parking pimping”. D.N.A-F. stated that individuals were socializing and playing music.

12. Detective Janay Patterson spoke with D.M.M. who stated that they were intoxicated and could not recall all the details. D.M.M. arrived at Elmnt Lounge around 10:40 p.m. for a “freaknik” event. A copy of that promotion is below:



13. D.M.M. stated that after the club let out, D.M.M. and other attendees gathered in the parking structure to hang out. D.M.M. used the term "parking lot pimpin" to describe the gathering. D.M.M. stated that multiple people were still partying and not ready to go home.

14. Detective Janay Patterson interviewed D.S.M. regarding the shooting. D.S.M. is an off-duty police officer from Illinois that was only in the City to attend the party at Elmnt Lounge. D.S.M. left when Elmnt Lounge closed and she left with her friend and her friend's cousin.

15. D.S.M. arrived at the parking structure and recalled that a boy named Trey had a blanket that belonged to her. D.S.M. was standing in her car's sunroof conversing with several people including her cousin about this blanket.

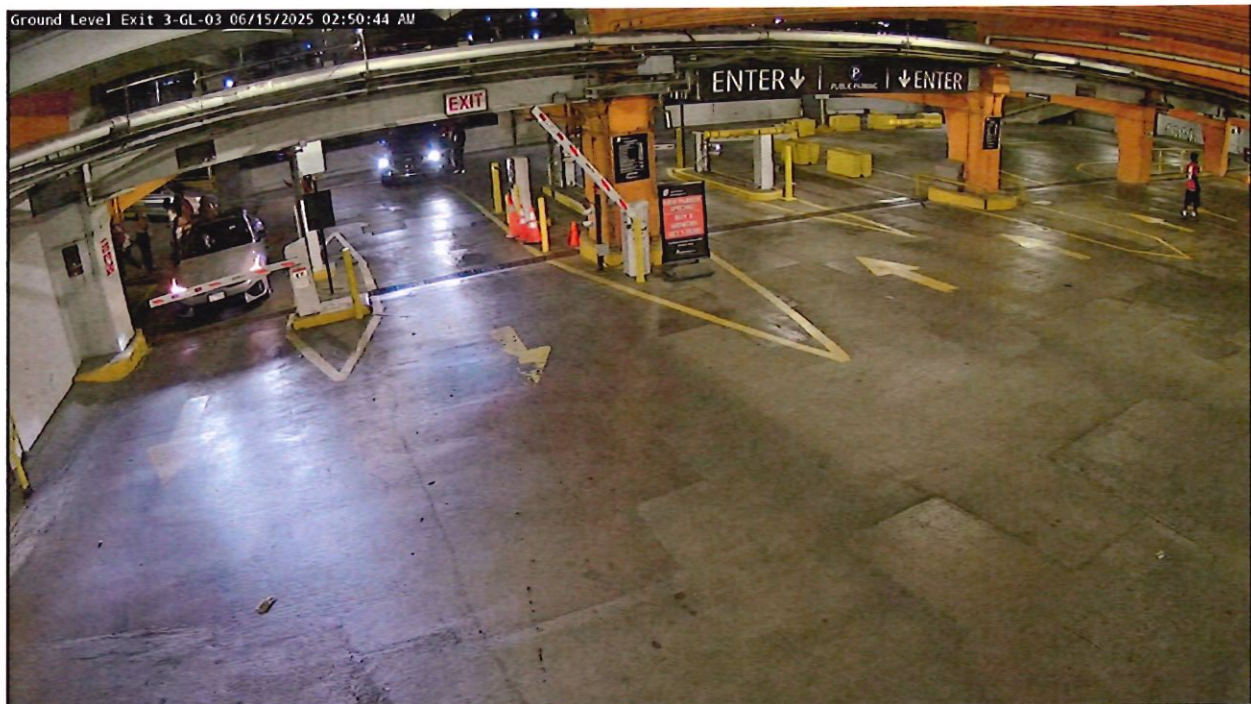
16. D.S.M. stated that a girl suddenly began hitting her with an unknown object. D.S.M. fought back. She felt her hair being pulled. D.S.M. realized her keys had been taken from her car. She reached through the driver's side window, unlocked the door and grabbed her firearm. She believed it would get the girl to return her keys.

17. D.S.M. pointed the gun at the girl she was fighting and demanded her keys back. While pointing the firearm, the firearm "went off". D.S.M. threw the gun back into her car and found the victim on the ground. D.S.M. called the police to report the incident and called her supervisor in accordance with her department's policy.

18. D.S.M. stated that she felt overwhelmed during the incident and stated that it was not just one girl attacking her, but about ten females which motivated her to retrieve her firearm after breaking free from the fight.

19. Below is an image taken from parking lot surveillance video which demonstrates a portion of the visible congregation of individuals from Elmnt Lounge at the parking lot

approximately twenty minutes prior to the shooting occurring in this area.



Elmnt Lounge Meeting

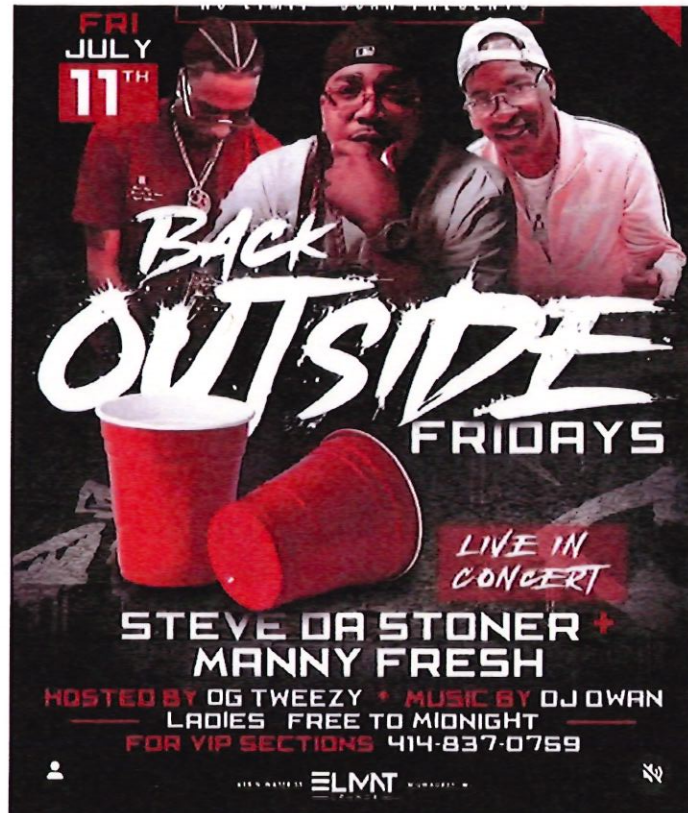
20. On June 23, 2025, a meeting occurred with Rajvir Bains and the Milwaukee Police Department.

21. Bains stated that he took over on June 1, 2025, and that the bar manager, “Nick”, has been managing and booking parties for the past twenty-two years.

22. Bains stated that at 1:50 a.m., they start to close down the bar. They make a wall of security and file guests out of the door and down to the intersection.

23. Rajvir Bains informed the department that the business would email a list of events that were to be hosted by Elmnt Lounge.

24. Bains did not inform the department of a July 11, 2025, promotion which involved two artists live in concert, a DJ and ladies free until midnight. The promotion is below:



23 24 17

oqtweezy414 Back Outside Friday #tonight @elmntlounge

July 11-12, 2025 Shooting

25. Six individuals were shot in front of Elmnt Lounge and two individuals, including A.D.H., died as a result of their injuries. Calls for service regarding the shooting began at 12:03 a.m. on July 12, 2025.

26. Rajvir Bains stated A.D.H. was having a party at the club with an artist scheduled to play. Bains stated that A.D.H. was promoting the party on social media and the club only made money off of the alcohol sales and there was nothing paid by A.D.H.

27. An Elmnt Lounge security guard named D.T.D. stated that A.D.H. arrived at the club around 11:10 p.m. and that A.D.H. went outside to wait for one of the performers.

28. An Elmnt Lounge front door security guard named T.D.J. stated they were with

A.D.H. who was waiting for one of the performers to show up that A.D.H. was promoting.

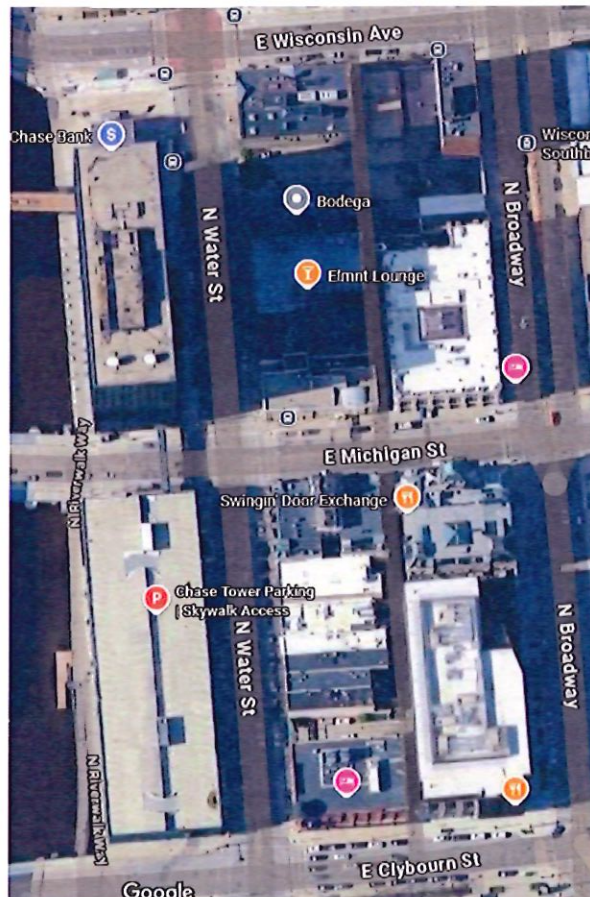
29. A group of individuals including an artist walked up to Elmnt Lounge and A.D.H. was in the process of giving them wristbands to get into the club and for the VIP section.

30. Two vehicles pulled up and stated “you thought I wouldn’t find ya’ll” and the gunfire began. T.D.J. took cover in Elmnt Lounge and, when T.D.J. came back out, A.D.H. was on the ground shot.

IMPACT ON NEIGHBORHOOD

31. Every City of Milwaukee resident knows how repeated gun violence in a location has an undeniable and profound impact on the surrounding community.

32. Repeated gun violence in Milwaukee’s downtown area is particularly unique and this fact must be considered by the Committee relative to this revocation.

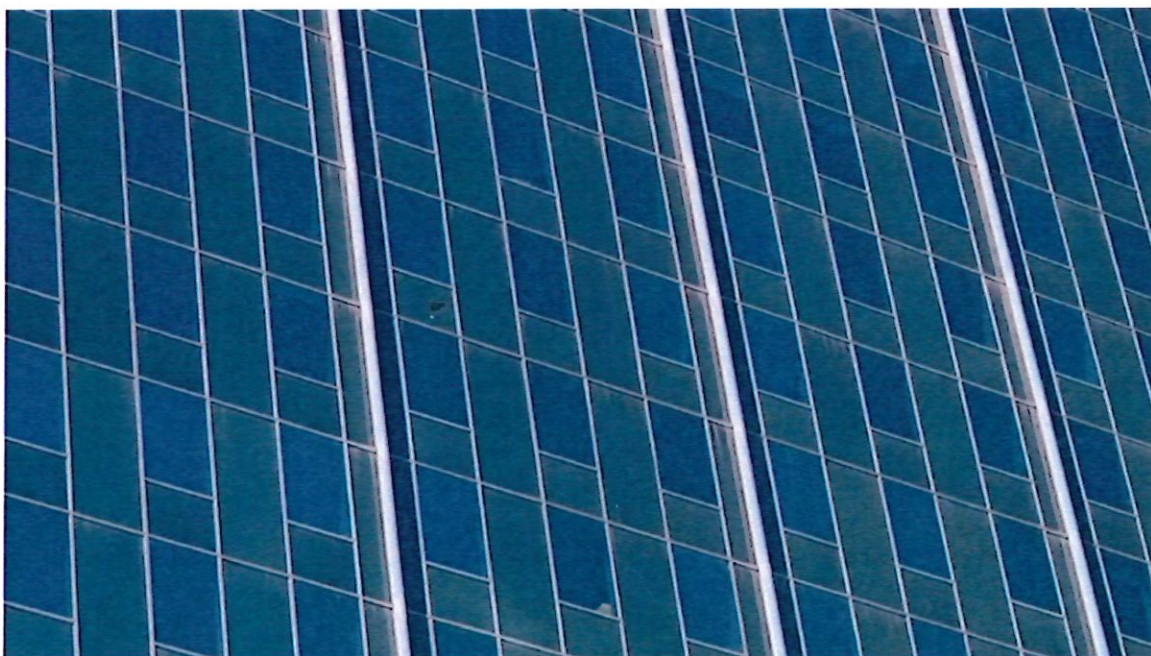


33. To begin, the very nature of the downtown area causes more people to be exposed to gun violence given the concentration of hotels, restaurants, entertainment and events in the general area with interstate access.

34. Even the very nature and structure of the downtown buildings, coupled with the reckless use of firearms in this location, leave the potential for the creation of unique future harm. By way of example, consider the following:

- a) On July 19, 2021, Chase Bank security called police and informed them of a bullet hole in a window of their building that was discovered after the fatal shooting referred to in ¶ 7.
- b) In April 2022, and as reported in several news outlets at the time, a portion of Water St. was shut down due to reports of falling glass.
- c) The below image is from Fox6 Milwaukee.

(<https://www.fox6now.com/news/glass-falls-from-chase-tower-in-milwaukee>)



d) The below image is from the Milwaukee Journal Sentinel.

(<https://www.jsonline.com/story/news/2022/04/14/winds-damage-window-chase-tower-milwaukee-sidewalks-closed-glass-falls/7322094001/>)



A broken window can be seen in one of the upper windows of the Chase Tower at 111 E. Wisconsin Ave in downtown Milwaukee on Thursday, April 14, 2022. Glass reportedly fell from the 22-story building to the pavement below, prompting police to close sidewalks. *Angela Peterson/Milwaukee Journal Sentinel*

- e) This glass could not be replaced until the high wind subsided.
- f) This spandrel glass was replaced and the work crew found a bullet in the process. The cost for glass replacement and equipment rental was \$7,897.50.
- g) To be clear, this was the same glass that was reported as damaged after the fatal shooting referred to in ¶ 7.

35. In the process of what has been described above at the parking structure, parking mechanisms can be damaged. As shown in ¶ 19, the parking lot mechanism was damaged on June 15, 2025, and the other lane was blocked by the congregation. Numerous vehicles passed

through the broken parking mechanism without paying fare.

36. Other monthly parkers have expressed concern and have threatened to leave. To that end, Elmnt Lounge voluntarily closed for two weeks after the events described in ¶¶ 25-30. The parking structure indicated that there was a reduction in broken glass and debris during the timeframe that Elmnt Lounge was closed.

37. Finally, the Committee must also consider how the repeated gun violence associated with Elmnt Lounge impacts the prosperity of the neighborhood. The following summaries of attached community impact statements, which are incorporated by reference, demonstrate how Elmnt Lounge's violence reverberates throughout this area.

- a) Business Improvement District No. 21 ("BID 21") has found that even the perception of danger devastates positive economic activity. (Exhibit E).
- b) Property owners at 532 and 534 N. Water St. have reported financial losses in excess of \$100,000 over the past year from tenants breaking leases due to safety concerns, late-night noise and waste accumulation. The same owners reinforce the negative perception of violence driving customers, residents and businesses away. (See Exhibit F).
- c) Rachel Greer is a business owner in the area and a longtime friend of A.D.H. Ms. Greer's statement not only provides the gravity of the moment, but Ms. Greer succinctly describes the enduring impact of loss in an area such as this. (Exhibit G).
- d) Finally, Visit Milwaukee has demonstrated that the recent violence impacts not only tourism, but the economic activity generated through convention business held in the City. (Exhibit H).

RELIEF REQUESTED

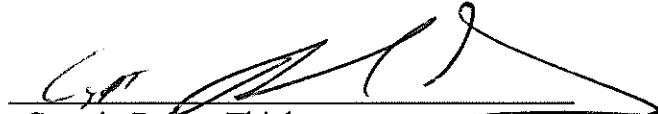
WHEREFORE, a license may be revoked for the enumerated reasons recited above. These grounds include any factor reasonably related to the public health, safety and welfare or any reasonable cause which shall be in the best interests and good order of the city.

BASED UPON all the allegations alleged above, the licenses granted at this location must be revoked.

THE CHIEF OF POLICE, by his designee, respectfully requests the revocation of all licenses relative to the above-referenced licensee and licensed premises.

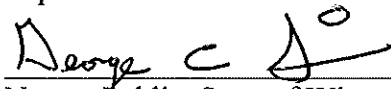
Dated at Milwaukee, Wisconsin this 12th day of September, 2025.

CHIEF OF POLICE JEFFREY NORMAN BY:



Captain Robert Thiel

The foregoing complaint was subscribed and sworn to and before me this 12th day of September 2025.



Notary Public, State of Wisconsin
My commission expires March 13, 2027.

Drafted by:
NATHANIEL E. ADAMSON
Assistant City Attorney
SBN: 1088858

