

CITY OF MILWAUKEE  
LICENSE DIVISION

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T. ANTHONY ZIELINSKI  
2463 South Superior Street  
Milwaukee, Wisconsin 53207

Complaint for Revocation of License

v.

CHASER'S PUB  
2155 South Kinnickinnic Avenue  
Milwaukee, Wisconsin 53207

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Comes now, T. Anthony Zielinski ("Complainant"), being first duly sworn and upon his oath who respectfully shows and alleges as follows:

1. Complainant is an adult resident of the City and County of Milwaukee, Wisconsin residing at 2463 South Superior Street.
2. Complainant is the Representative for the 14<sup>th</sup> Aldermanic District in the City of Milwaukee, Wisconsin.
3. That Frank Fred Dobert (Licensee) of Chaser's Pub is the holder of a Class "B" Tavern license for the premises located at 2155 S. Kinnickinnic Avenue, Milwaukee, Wisconsin.
4. That a search of the Wisconsin Consolidated Court Automation Programs (CCAP) website revealed that the Milwaukee County District Attorney formally charged a patron, who sold crack cocaine to an undercover police officer on two separate dates inside Chaser's Pub, namely: on **August 1, 2007** (.46 grams of crack cocaine) and **July 26, 2007** (.37 grams of crack cocaine). The patron was charged with two counts of Delivery of a Controlled Substance (Cocaine). The patron was arrested by Milwaukee Police Officers inside Chaser's Pub. The patron was searched by the arresting officers and 11 corner cuts of crack cocaine were found in his possession.

5. That a search of the CCAP website revealed that the Milwaukee County District Attorney formally charged a patron who sold crack cocaine to an undercover police officer inside Chaser's Pub on three separate dates, namely: on **August 01, 2007** (2.39 grams of crack cocaine), **July 21, 2007** (.35 grams of crack cocaine), and **July 19, 2007** (0.43 grams of crack cocaine). The patron was charged with three counts of Delivery of a Controlled Substance (Cocaine) and with Possession with Intent to Deliver Controlled Substance (Cocaine). The patron arranged the drug transaction to occur with the undercover officer at Chaser's Pub. The patron was arrested at Chaser's Pub. A search of the patron, conducted by Milwaukee Police Officers, revealed \$142 in suspected drug proceeds, and 13 corner cuts of crack cocaine. The patron informed officers that she has been selling cocaine for the past four or five months. The patron stated she has been selling cocaine at Chaser's Pub.

6. That a search of the CCAP website revealed that the Milwaukee County District Attorney formally charged a bartender of Chaser's Pub for selling crack cocaine to patrons inside Chaser's Pub on **July 21, 2006**. The bartender was charged with Possession with Intent to Deliver Controlled Substance (Cocaine). At the time of the arrest, the bartender admitted to police officers that she is a bartender and that a customer having a drink asked her if she was "good," meaning did she have any drugs. The bartender was not working at Chaser's Pub at the time, but instead was drinking as a customer inside the bar. The bartender told officers she had no drugs on her and therefore had to make a drug run to one of her suppliers to purchase an 8-ball of crack cocaine.. The bartender then stated she returned to Chaser's Pub to complete the drug transaction with the customer inside the bar. The bartender further stated she only sold

crack cocaine while at Chaser's Pub. The bartender then stated that customers would ask for cocaine and she would go into the bathroom and get it for them.

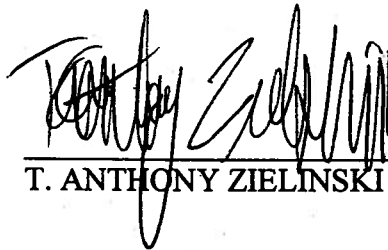
7. That a search of the Computer Aided Dispatch Reports of the Milwaukee Police Department reveals that on **September 23, 2007**, a 911 Abuse call was made to the Milwaukee Police Department from Chaser's Pub.

8. That a search of the Milwaukee Municipal Court (MCO) records reveals that on **April 25, 2005**, Frank Fred Dobert, (Licensee), received a Milwaukee municipal citation for Safe Egress From Entering Doors/Serving Room in violation of MCO §90-27-1-D.

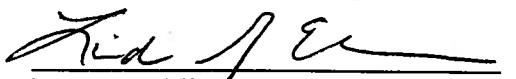
9. That a search of the MCO records reveals that on **December 11, 2004**, Licensee received a Milwaukee municipal citation for Sale of Alcohol to Underage Person, in violation of MCO § 90-18-1-A-1.

10. Wherefore, your Complainant prays that the Class "B" Tavern License for the premises at 2155 S. Kinnickinnic Avenue, Milwaukee, Wisconsin, Chaser's Pub, be revoked.

Signed and dated at Milwaukee, Wisconsin this 26 day of November, 2007.

  
T. ANTHONY ZIELINSKI

The foregoing complaint seeking revocation of the Class "B" Tavern license was subscribed and sworn to before me this 26 day of November, 2007.

  
Notary Public, State of Wisconsin  
My Commission expires: 4/1/10  
124227

