

HORACIO SANCHEZ,
d/b/a El Rodeo,
1586 S. Pearl St.
Milwaukee,, WI 53204
Petitioner,

v.

Case Code 30955, 30704

CITY OF MILWAUKEE AND
JAMES R. OWCZARSKI, CITY CLERK
200 E. Wells St.
Milwaukee, WI 53202
Respondents.

14CV003515

CITY OF MILWAUKEE
2014 APR 24 PM 3:51
CITY CLERK'S OFFICE

FILED AND AUTHENTICATED
APR 24 2014
JOHN BARRETT
Clerk of Circuit Court

COMPLAINT

Petitioner, Horacio Sanchez, by his attorney, Vincent J. Bobot, brings this action against the Respondents, City of Milwaukee and City of Milwaukee Common Council, and hereby petitions this Court for judicial review pursuant to Wis. Stats. sec. 125.12(2)(d), and an order commanding the City of Milwaukee and City of Milwaukee Common Council to immediately restore the Class B Tavern and Public Entertainment Premises licenses of Petitioner for its tavern located at 1586 S. Pearl St., Milwaukee, Wisconsin. The petition shows:

1. Petitioner Horacio Sanchez is a Wisconsin resident residing at 1015 S. 30th St. Milwaukee, WI 53215.
2. Petitioner operates a duly licensed tavern at 1586 S. Pearl St., Milwaukee, Wisconsin, and holds Class B Tavern and Public Entertainment Premises licenses, with a renewal and/or expiration date of October 5, 2014, issued by the City of Milwaukee pursuant to Milwaukee Ordinances 90-4 and 108-5.
3. Respondent, City of Milwaukee, is a municipal body organized and existing under the laws of the State of Wisconsin with principal offices located at 200 E. Wells St., Milwaukee, Wisconsin, 53233.
4. Respondent City Clerk James R. Owczarski is an adult resident of the State of Wisconsin and is, by designation, the City Clerk of the City of Milwaukee.

5. The City's Licenses Committee, on a citizen complaint pursuant to Wis. Stats. sec. 125.12(2)(ag), held a hearing on April 8, 2014, and voted to recommend to the City's Common Council that Petitioner's licenses be revoked.

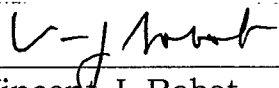
6. On April 22, 2014, the Milwaukee Common Council held a hearing on whether or not to revoke the licenses.

7. Following the hearing, on April 22, 2014, the Common Council adopted the recommendation of Licenses Committee to revoke the licenses.

Wherefore, Petitioner, Horacio Sanchez, requests that this Court:

- A. Issue a temporary restraining order enjoining the city of Milwaukee, its agents, attorneys and all those in active concert or participation with them, including but not limited to its Common Council and its Police Department, from taking any action to enforce the Common Council's ruling that Petitioner's licenses be revoked;
- B. Issue a writ of certiorari, and review the evidence;
- C. Enter an order reversing the decision of the Common Council to revoke Petitioner's licenses; and
- D. Award costs, attorney's fees, and any other such relief which the Court may deem just and equitable.

Dated this 23rd day of April, 2014.



Vincent J. Bobot
State Bar #1020732

Vincent J. Bobot
Attorney at Law
5414 S. 13th St.
Milwaukee, WI 53221
(414)430-1249