



**MILELE A. COGGS**  
ALDERWOMAN, 6TH DISTRICT

**CHAIR**

- Licenses Committee
- Milwaukee Arts Board
- American Rescue Plan Act Allocation Task Force

**MEMBER**

- Finance and Personnel Committee
- Steering and Rules Committee
- Library Board
- Neighborhood Improvement Development Corporation Board
- Wisconsin Center District

March 14, 2024

To the Honorable, the Common Council

Honorable Members:

Common Council File Number 231731 contains the following recommendations:

Nonrenewal of the Tattoo and Body Piercing License for Francisco V. Flores Jr., based upon the preponderance of the evidence in the police report, aldermanic and applicant testimony that demonstrates the operation results in threat to health, safety or welfare of the public; for the premises located at 3180 S 27<sup>th</sup> St. ("World Class Tattoos") in the 13<sup>th</sup> aldermanic district.

Attached are written the written objections. This matter will be heard by the full Council at its Tuesday, March 19, 2024 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,

Milele Coggs, Chair  
Licenses Committee

cc: All Council Members  
File 231731





LAW & CONSULTING, S.C.

March 13, 2024

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**RE: OBJECTION TO FINDINGS OF FACT &  
CONCLUSIONS OF LAW  
World Class Tattoos LLC – 3180 S 27<sup>th</sup> St., Milwaukee, WI 53215**

To Whom it may concern,

Please be advised that my office represents Mr. Francisco Flores, the agent for World Class Tattoos LLC (“Business”), located at 3180 S 27<sup>th</sup> St., Milwaukee, WI (“Premises”), as it relates to the City of Milwaukee Licensing Committee’s recommendation of nonrenewal for my client’s Tattoo and Body Piercing license (“License”).

I am in receipt of the Report of the Licenses Committee relating to the Committee’s Findings of Fact and Conclusions of Law, dated March 8, 2024, which recommends nonrenewal of the License. I write to **object** to the Committee’s findings and urge the Common Council to reject the Committee’s recommendation. The hearing and deliberations that occurred before the Committee on March 5, 2024, regarding the License was not in accordance with fundamental rights afforded by the United States Constitution, State Law and Local Ordinances.

It with a profound sense of urgency and a call to fairness that I present our objections to the Committee’s recommendation. The Committee’s decision not only threatens the livelihood of an upstanding business owner but also challenges the integrity of our legal and societal norms.

For over fourteen years, World Class Tattoos has been more than just a business; it has been a sanctuary for art and expression, operating with unwavering adherence to professional standards and local regulations. Throughout this period, Mr. Flores has maintained a clean disciplinary record,

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showcasing his commitment to excellence and community safety. For 14 years, the establishment has never been subjected to any disciplinary proceedings or been the target of any police reports or objections.

The process leading to the recommendation of non-renewal was marked by significant procedural and substantive flaws. Relying heavily on hearsay and disregarding the need for a fair and impartial hearing, the Committee effectively bypassed the fundamental due process rights owed to Mr. Flores. Furthermore, the initial decision to impose a 45-day suspension, subsequently revisited and escalated to a non-renewal on the basis of still-pending charges, underscores a departure from the principles of justice and state law which expressly prohibits discrimination based on an individual's arrest record.

None of the officers brought in by Alderman Spiker could provide consistent or clear evidence that my client had any knowledge of the weapons found at the Premises. My client, time and time again, testified to his residence being in Green Bay at the time of execution of the search warrant in April 2023. The Committee's recommendation was not based on the testimony provided by my client, but rather ignored and determined to be untrue after further testimony by the Milwaukee police officers. My client was not residing at the Premises, the weapons did not belong to him, and no testimony provided by the police officers could implicate anything other than that. No police officer could provide testimony on any DNA or fingerprints of my client being found on the weapons.

No police officer could testify that my client was at the Premises at the time of the search warrant as it was not his personal residence. Instead, the Committee refused to comprehend that my client had multiple tattoo shops being operated concurrently, with my client's primary residence being located near the Green Bay location. The thought that my client's employees legally owned the weapons found at the location, unbeknownst to my client, was never earnestly entertained by the Committee when making their decision and recommendation. To deny my client's employees the opportunity to legally conceal and carry weapons would violate their 2<sup>nd</sup> amendment constitutional rights. Further, my client's abilities to defend himself were further limited by the current pending case and the officer's selective responses to questions posed. By allowing the proceedings to go forward and then issuing my client the ultimate business death penalty, the Committee torched Mr. Flores's 4<sup>th</sup> and 5<sup>th</sup> amendment constitutional protections.

As is often the case, besides parroting undefinable vague standards that allude to "public safety and welfare", the Committee cannot point to any requirements under the City's ordinance or State statutes that my client violated. Try as it may, the Committee's decision was entirely based on Mr. Flores's pending charges and his arrest record. The Committee unlawfully took it upon itself to play judge, jury, and executioner of Mr. Flores livelihood without providing him with a meaningful hearing or opportunity to defend himself.

Moreover, the Committee's decision to recommend non-renewal based on pending charges not present at the initial hearing contradicts Wisconsin state law, which explicitly prohibits

discrimination based on an individual's arrest record. This procedural flaw highlights a deviation from established legal principles and due process.

The recommendation to non-renew Mr. Flores's license is fundamentally flawed, rooted in a disregard for the presumption of innocence—a bedrock principle of our legal system. The pending charges against Mr. Flores, relating to a possession of a firearm by a felon, have no direct correlation to his business operations. More critically, these charges remain unproven, rendering the Committee's decision premature, unjust, and illegal.

In this era, the disparity in the application of justice between public figures and everyday citizens is not just noticeable—it's alarmingly pronounced. For a vivid example, consider the situation of Donald Trump. Facing an astounding 91 criminal charges, Trump navigates his legal battles without any encumbrance to his constitutional rights. He retains the presumption of innocence, a principle allowing him to pursue the highest office in the land once more, without hindrance. This stands in stark contrast to the predicament of a small business owner from Milwaukee's south side, who finds himself ensnared by the legal system over minor, unresolved charges.

But one need not go far for examples of such selective application of the presumption of innocence. In recent memory, in every instance where a local Milwaukee alderperson has been charged with a crime, members of this same body, correctly, have been quick to affirm the presumption of innocence in support of their colleagues. We are not aware of any instance where any member of this body has been terminated, impeached, deprived of their livelihoods, or thrown out of the Common Council simply because of pending criminal felony charges. Even when those charges contain significant allegations pertaining to the violation of public trust. We ask that those same principles, constitutional guarantees, and courtesies be applied to the common folk. What is good for the goose, should be good for the gander.

If the Committee's decision is left to stand, the message embedded in the selective outrage and discrepancy will be clear and disheartening: the principles of justice, including the bedrock notions of Due Process and the presumption of innocence, seemingly falter at the doors of Milwaukee's City Hall. If the Committee's flawed decision is upheld by the Common Council, it would not only mark a grave injustice but also set a concerning precedent, highlighting a somber and potentially tragic discrepancy in the application of our most fundamental legal safeguards.

The decision before the Common Council transcends the fate of a single business; it is a testament to our collective commitment to fairness, due process, and equality under the law. By reversing the Committee's recommendation, the Council can reaffirm its dedication to these ideals, ensuring that the entrepreneurial spirit of Milwaukee's citizens is not quashed by procedural misjudgments and unwarranted presumptions of guilt.



Your consideration of this appeal reflects not just on the fate of World Class Tattoos but on the values, we uphold as a community and a society. Please feel free to reach out to me with any questions.

Very Truly Yours,

**OVB Law & Consulting, S.C.**

*/s/*

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