

CHAIR

- Licenses Committee
- City Information Management Committee

VICE CHAIR

- Milwaukee Arts Board

MEMBER

- Steering and Rules Committee
- Public Works Committee
- Milwaukee Public Library Board
- Employee's Retirement System Annuity & Pension Board



NIK KOVAC

ALDERMAN, 3RD DISTRICT

March 19, 2020

To the Honorable, the Common Council

Dear Members:

Re: Common Council File Number 191591

Attached is the written objection to file number 191591, Motion relating to the recommendations of the Licenses Committee relative to licenses, relating to the recommendation of:

Nonrenewal, based upon Department of Public Works, aldermanic, and applicant testimony of the Recycling, Salvaging, or Towing Premises license for Muhammad Abdus-Salaam for the premises located at 4453 N Green Bay Ave (“Action Towing”) in the 1st aldermanic district.

This matter will be heard by the full Council at its Tuesday, March 24, 2020 meeting. Pursuant to City Ordinances, a roll call vote will be taken to confirm that all members have read the attached statements and materials.

Respectfully,

A handwritten signature in black ink, appearing to read 'Nik Kovac'.

Nik Kovac, Chair
Licenses Committee

cc: All Council Members
City Attorney's Office
Common Council/City Clerk – License Division
CCF 191591

STUPAR, SCHUSTER & BARTELL, S.C.

A Limited Liability Organization

Attorneys at Law

Suite 1800

633 West Wisconsin Avenue

Milwaukee, Wisconsin 53203-1918

George S. Stupar (1940-1975)

Michael P. Stupar
Jeffrey S. Schuster
Thomas M. Bartell, Jr.

414-271-8833
Fax: 414-271-2866
E-mail: ssb@ssblawsc.com

Todd T. Nelson
Janine L. Collette
James J. Wold

March 18th, 2020

Via Email Only (jowcza@milwaukee.gov)

Office of the City Clerk

City Clerk Jim Owczarski

City Hall

200 East Wells Street, Room 205

Milwaukee, WI 53202

Re: Action Towing, LLC, 4453 N Green Bay Avenue, Milwaukee
Objections

Dear City Clerk Owczarski,

My office is Counsel to Action Towing, LLC. This letter serves as my client's written objection to the "Findings of Fact and Conclusions of Law" and recommendation of the Licenses Committee ("Committee"). The specific objections are for Paragraph 5 on the "Findings of Fact":

1. Paragraphs 5A & B provide no basis for any license discipline. The licensee maintained control of the vehicle until Milwaukee police officers appeared to claim the vehicle. The tow was properly reported to the City and when the vehicle owner reported the vehicle stolen, the City databases did not match up.
2. Paragraph 5C does not provide a basis for license discipline. The licensee was the subject of a licensed premises check. After the interview, all papers were moved to the office, new contracts were drafted, and vehicles were properly registered.
3. As for Paragraph 5D the licensee is prepared to pay all current fees, make a payment on the past due balance and make a payment plan for the remaining balance.
4. Paragraph 5F contains matters which were not noticed for the hearing and should not have been considered by the committee.
5. The Licenses Committee recommendation for non-renewal violates Action Towing, LLC's property right in its licenses.

Thank you for your attention to this matter.

Sincerely,

Electronically signed by Janine L. Collette

Attorney Janine L. Collette

cc: Action Towing LLC