

In re: The Precious Metals and Gem Dealer License of:

Reflections Jewelry, Inc.
Agent: Firdous A. CHANDANI
1306 W. Forest Home Ave.
Milwaukee, Wisconsin 53204

CITY OF MILWAUKEE
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RONALD D. LEONHARDT
CITY CLERK

SWORN CHARGES BY CHIEF OF POLICE FOR REVOCATION OF LICENSE

Pursuant to Wis. Stat. § 134.71(10), and § 92-10-6, Milwaukee Code of Ordinances, Chief of Police Edward FLYNN, by Captain Donald J. GAGLIONE, Commander of Police District Two, being first duly sworn and upon his oath, respectfully charges the following based upon review of official Milwaukee Police Department investigative reports and communication with police and city officials:

1. That Firdous A. CHANDANI (DOB 10-29-1967), [herein after referred to as "Licensee" or "CHANDANI"], is the holder of a Precious Metals and Gem License, herein after referred to as PM & G, for the premises known as Reflections Jewelry located at 1306 W. Forest Home Ave. in the City and County of Milwaukee, WI. That CHANDANI's PM & G license number for the 2009 year is #274, and for the 2010 year is #331;
2. Your affiant states that for the past three months, P.O. Jeffrey THIELE and his partner, P.O. Glenn PODLESNIK, who are police officers under your affiants command, have been assigned to a special burglary detail at District 2. During this period, P.O.'s THIELE and PODLESNIK learned through their investigations that jewelry taken from these numerous burglaries had been sold to jewelry shops throughout District 2 in violation of the requirements of Wisconsin Statute section 134.71 and City of Milwaukee Ordinance 92-10;
3. That your affiant knows through everyday dealings that the price of gold has substantially increased in recent months;
4. That your affiant knows that P.O.'s THIELE and PODLESNIK have arrested several burglars over this three month period and several of those burglars have confessed to their crimes. That these burglars told P.O.'s THIELE and PODLESNIK during Mirandized interviews that they sold the gold and jewelry they stole to jewelry shops in District 2 such as Star Jewelry, Cash N' Gold and Reflections. Specifically, suspect Jeremiah SZPOT (DOB 09-21-1984) confessed to a theft of jewelry from his mother's home located at 2640 S. Superior St., in the City and County of Milwaukee. That SZPOT took P.O. THIELE to Reflections Jewelry and pointed out which employee he sold the jewelry to. There were no records at Reflections regarding this transaction, and no way to recover that gold for the victim;

5. That your affiant knows that according to City of Milwaukee ordinance 92-10-6 and its subsections, that PM & G dealers are required to obtain a picture identification card from a member of the general public who wishes to sell gold or jewelry and other precious metals to a PM & G dealer. That in lieu of a picture identification card, the PM & G dealer may take another form of identification and then obtain a fingerprint. That PM & G dealers located within the City of Milwaukee are required by ordinance to properly complete a Milwaukee Police Department provided form, labeled a PP-16A, every time they purchase gold and jewelry or other precious metals from the general public. That PM & G dealers are required by ordinance to obtain a written declaration of ownership from the general public seller. That PM & G dealers are required by law to maintain a book or ledger and are to record legibly and in the English language every purchase of gold and jewelry and precious metals in said book, and that the book or ledger shall be kept for a period of one year. PM & G dealers are required by law to keep the jewelry purchased from the general public seller for a period of 15 days;
6. That on November 11, 2009, at approximately 11:22 a.m., an undercover police officer entered Reflections Jewelry located at 1306 W. Forest Home Ave., and was able to sell jewelry to the owner of Reflections Jewelry, Firdous A. CHANDANI (DOB 10-29-1967), without the use of a picture identification card of any kind. CHANDANI purchased several pieces of gold jewelry for \$100.00. CHANDANI and his employee did ask for ID, but when the undercover officer stated he did not have an ID, CHANDANI approved the purchase anyhow, asking the undercover officer to bring the ID into Reflections later that day. This transaction was captured on audio and video recordings. The money received by the under cover police officer was placed on MPD Inventory #496832, and the video placed on MPD Inventory #496833;
7. That based upon information obtained through the investigations of P.O.'s THIELE and PODLESNIK, and the undercover operation, P.O. THIELE authored a search warrant for Star Jewelry. The Honorable Barry C. SLAGLE, Milwaukee County Court Commissioner, signed the warrant. The warrant was for illegally obtained jewelry, the recovery of Milwaukee Police Department jewelry that had been purchased by CHANDANI and documents, utility bills, surveillance equipment, and other papers that showed who was in control of the business;
8. That on Tuesday, November 24, 2009, at approximately 12:01pm, P.O.'s THIELE and PODLESNIK, along with P.O.'s Chris CHU and Jill GUTIERREZ, assisted by Sgt. Sean HANLEY, executed that search warrant on Reflections Jewelry. That P.O. THIELE read the warrant to CHANDANI and provided him with a copy of said warrant. It should be noted that November 24, 2009, is a date that falls within the 15 day holding period from the sale of jewelry by the undercover officer in which licensed PM & G dealers are to hold onto gold and jewelry purchased from the general public as required by law;
9. That P.O.'s THIELE and PODLESNIK demanded to see all the gold that CHANDANI had purchased within the last 15 days and demanded to see his books or ledgers. That CHANDANI did claim to provide all the gold and jewelry that he had purchased in the last 15 days along with his books/ledgers. That CHANDANI's books were not as

complete as they should be, though they reflected the gold that had been purchased, and the PP-16A's were completed as well;

10. That CHANDANI stated to police that he follows the laws and does nothing wrong. That CHANDANI stated that he does not purchase gold and jewelry illegally. That CHANDANI denied any wrong doing until P.O. PODLESNIK showed CHANDANI a photograph of the jewelry that our undercover officer sold to him, and then was showed a photograph of CHANDANI himself and his employee at the counter of his business conducting gold and jewelry transactions with the undercover officer while not following the law. That CHANDANI then admitted he conducted that transaction illegally. CHANDANI also admitted that he had received a phone call from SANDINO Jr. about the search warrant executed at Star Jewelry, so CHANDANI had more than enough time to square his business away. Proof of this was found in a garbage can in a north office. Shredded papers containing pictures of ID's were located in that garbage can. CHANDANI also stated that CHANDANI and SANDINO Jr. and SANDINO Sr. were all business partners;
11. That while speaking with CHANDANI in his office, P.O. THIELE inquired about a large clear plastic bag full of gold sitting on a table. CHANDANI explained to P.O. THIELE that the bag of gold was gold that was over the 15 day holding period, waiting to be melted down, and we didn't have to worry about that gold. P.O. THIELE acknowledged this but demanded to see the books/ledgers for that gold, along with the PP-16A's for that gold, since books/ledgers are to be kept for a period of 1 year;
12. That CHANDANI admitted to P.O.'s THIELE and PODLESNIK that that particular bag of gold does not have any PP-16A's that would match it. CHANDANI stated that he shreds his books after the 15 day holding period, so there won't be any books/ledgers for it either. CHANDANI also admitted that most of the gold in the bag was taken without following the laws and ordinances that govern PM & G dealers. This gold was confiscated by P.O.'s THIELE and PODLESNIK. The gold was photographed and weighed in the presence of CHANDANI and weighed 817.9 grams;
13. That all of the gold that was removed from Reflections Jewelry was placed on Milwaukee Police Department inventory numbers #496954 along with books, ledgers, papers, and surveillance equipment;
14. That P.O.'s THIELE and PODLESNIK know through investigation that suspects regularly commit crime in other jurisdictions outside the City of Milwaukee, and that those suspects regularly bring the stolen gold and jewelry into the City of Milwaukee to sell. That on Thursday, December 3, 2009, P.O. THIELE called every police jurisdiction in the County of Milwaukee and informed them of the jewelry investigation. That P.O. THIELE invited every police jurisdiction in the County of Milwaukee to send a representative to District 2 to view the gold and jewelry before the public could view it in an attempt to possibly clear outside jurisdiction burglaries or crimes in which gold and jewelry were taken. That on Thursday, December 3, 2009, at approximately 11:30am,

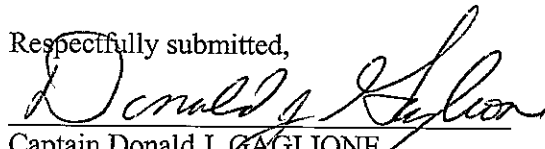
your affiant held a media/press conference at the District 2 police station. That your affiant informed the media/press of the operation that had been conducted and that P.O.'s THIELE and PODLESNIK would hold a public viewing of the gold starting on Tuesday, December 7, 2009. That your affiant made it very clear to the public that in order to view the gold and jewelry, the citizen would have to have reported a valid crime prior to the operation and have that corresponding police report on hand, along with picture identification;

15. That starting on Tuesday, December 7, 2009, P.O.'s THIELE and PODLESNIK displayed the jewelry at the District 2 police station for the public to view. That over the next 3 days, (Tuesday, December 7, 2009 through Thursday, December 9, 2009), P.O.'s THIELE and PODLESNIK had over 150 citizens come into District 2 and view the gold and jewelry. Citizens came from as far away as Green Bay, Sheboygan, Fond Du Lac, and Madison;
16. That over these 3 days, P.O.'s THIELE and PODLESNIK were able to partially clear 7 burglaries or thefts in the City of Milwaukee, and 8 burglaries or thefts from outside jurisdictions;
17. That Maria GONZALEZ was the victim of a burglary on October 8, 2009, and her Milwaukee Police Department Incident number is #092810179. That GONZALEZ positively identified 2 pieces of jewelry, a watch and a ring. That these items were documented descriptively in her police report and were returned to her, thus partially clearing a burglary. These items were originally recovered by P.O.'s THIELE and PODLESNIK during the search warrant at Reflections Jewelry. There will be no chance of identifying a suspect in this offense because CHANDANI failed to follow the laws and ordinances that govern PM & G dealers when purchasing from the general public. CHANDANI failed to obtain identification, failed to file the PP-16A, failed to record the transaction in his ledger and failed to obtain any kind of written declaration of ownership from the seller;
18. That Fauzi SWEI was the victim of a burglary on August 19, 2009, and her Milwaukee Police Department Incident number is #092310176. That SWEI positively identified 2 pieces of jewelry that were documented in her police report. That these items were returned to SWEI, thus partially clearing a burglary. These items were originally recovered by P.O.'s THIELE and PODLESNIK during the search warrants at Star Jewelry and Reflections Jewelry. There will be no chance of identifying a suspect in this offense because SANDINO JR. and CHANDANI both failed to follow the laws and ordinances that govern PM & G dealers when purchasing from the general public. SANDINO JR. and CHANDANI both failed to obtain identification, failed to file the PP-16A, failed to record the transaction in their ledger and failed to obtain any kind of written declaration of ownership from the seller (s);
19. That after the jewelry display to the public was over and this operation was coming to an end, P.O.'s THIELE and PODLESNIK went to all 4 jewelry stores involved in this operation and did spot check all 4 businesses. P.O.'s THIELE and PODLESNIK noted that it took an undercover operation, 85 citations with fines over \$40,000, and over 50

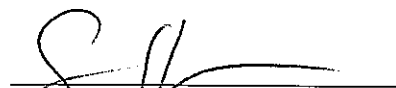
PA-33's, along with the confiscation of approximately \$75,000 worth of illegally purchased gold, for these businesses to start complying with the laws of the State of Wisconsin and the ordinances of the City of Milwaukee;

20. That the above-described conduct by the Licensee on the licensed premises amounts to the purposeful frustration of burglary and theft investigations, and other crimes that involve stolen jewelry in connection to the licensed premises. That the Licensee failed to abide by the laws of the State of Wisconsin and the ordinances of the City of Milwaukee by failing to obtain a picture identification card, failing to complete a PP-16A, failing to record any transaction in his ledger, failing to keep that ledger for at least one year, failing to obtain any written declaration of ownership and failing to keep jewelry purchased from the public for the 15 day holding period;
21. That the premise is operated in such a manner that it constitutes a public nuisance. That the conduct of the Licensee had a substantial adverse effect upon the well being of the citizens and neighbors. That the continued operation of the Licensee on this licensed premise is not in the best interests and good order of the city as set forth in the Milwaukee Code of Ordinances. Therefore, the Chief of Police, by his designee, respectfully requests that the PM & G License of Firdous CHANDANI for the premises known as Reflections Jewelry, located at 1306 W. Forest Home Ave., City and County of Milwaukee, Wisconsin, be immediately revoked.

Respectfully submitted,


Captain Donald J. GAGLIONE
Commander
Milwaukee Police District Two

The foregoing complaint seeking revocation of the PM & G license was subscribed and sworn to before me this 22nd day of December, 2009.


Notary Public, State of Wisconsin
My Commission is permanent expires: 1-1-2012

Approved as to content and form:
Jarely Ruiz, Assistant City Attorney
Adam Stephens, Assistant City Attorney

