

**Vincent J. Bobot**

Attorney at Law  
5414 South 13th Street  
Milwaukee, WI 53221  
(414) 430-1249  
Facsimile: (414) 282-9522

Milwaukee Common Council  
C/O City of Milwaukee  
200 East Wells Street, Room 205  
Milwaukee, WI 53202-3570

Re: Shubh Alliance Inc.  
Amritdeep Kaur, Agent

Dear Common Council Members:

On behalf of my client, I am filing a written objection to the License Committee's findings of fact, conclusions of law and recommendation not to renew the Extended Hours Establishment license held by Amritdeep Kaur, agent for Shubh Alliance, Inc., for the premises located at 714 North 27th Street in the City and County of Milwaukee, Wisconsin ("Mobil Gas Station") based upon the police report, police testimony, aldermanic objections and neighborhood objections.

Basically, there were three items on the police reports submitted to the License Committee as cause for non-renewal of the extended hours establishment license.

The first incident allegedly occurred on November 30, 2011 between the hours of 12:00 a.m. and 2:00 a.m.. On that date, police were conducting a surveillance of the gas station due to an alleged high volume of subjects loitering, drug related activity, and vehicles with loud music violations. The police reported numerous municipal violations. However, there was no testimony provided to the License Committee of numerous municipal violations occurring on that date during those time periods at 714 North 27th Street.

On December 6, 2011 at 1:35 a.m., police reported they were conducting another surveillance at the Mobil Gas Station at 714 North 27th Street. Officers observed a subject drinking a fermented malt beverage with another person on the parking lot. Municipal citations were issued for public drinking. Additional testimony revealed that there were no alcoholic beverages sold at the Mobil Station and that the perpetrators apparently walked up to the gas station holding the fermented malt beverages.

Finally, it was reported on December 12, 2011 between the hours of 12:00 a.m. and 2:00 a.m., Milwaukee police were again conducting another surveillance at the Mobil Gas Station at 714 North 27th Street. At that time, officers observed two subjects urinating on the side of the gas station. Both subjects were then cited for

CITY OF MILWAUKEE  
12 APR -3 PM 1:55  
RONALD D. LEONHARDT  
CITY CLERK

disorderly conduct.

There was additional testimony from police officers concerning loitering, panhandling and public drinking. No specifics were given nor were there any alleged perpetrators cited for such activity. Testimony was then given by a citizen witness, namely, Marilyn Byrd at the hearing. Ms. Byrd did not give any testimony regarding illegal activities occurring at the Mobil Gas Station. Ms. Byrd testified that she and her church were at a bus stop evangelizing next to the gas station parking lot.

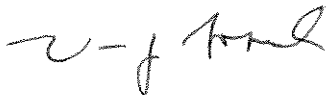
My client, Ms. Kaur, testified that during her one year and four month tenure as the licensee, no loitering signs were posted in front of the station and eight security cameras have been installed on the premises. She further testified that no alcoholic beverages were sold at the gas station. Ms Kaur further stated that they do not allow any people to loiter at the gas station.

Ms. Kaur strongly objects to the non-renewal of her extended hours establishment license. Her gas station business is located in a high pedestrian and vehicular traffic area. There are bus stops located in the immediate area. For an entire year, with police surveillance during the extended time period of operation, three incidents were documented. Of those three incidents, the gas station business was not responsible for any of them. No loitering signs are posted on the premises, there is camera surveillance in and about the gas station, and it is operated in a business-like manner.

In conclusion, my client believes the City of Milwaukee is trying to take the gas station business away from her to demolish the property for another development. The City of Milwaukee has made efforts to purchase the property located at 714 North 27th Street from the owner and purchase the lease rights from my client, Negotiations for the sale are still pending and my client is only asking for just compensation from the owner and the City of Milwaukee for her interest in the property and business.

Ms. Kaur is asking members of the Milwaukee Common Council to reject the License Committee's recommendation to not renew the Extended Hours Establishment license for the premises located at 714 North 27th Street ("Mobile Gas Station"). The loss of the extended hours of operation at the gas station would be detrimental to my client's business and the reasons for the non-renewal are without merit.

Very truly yours,



Vincent J. Bobot  
Attorney at Law