

November 11, 2024

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[via Email]

City of Milwaukee, City Attorney's Office

Attn: Attorney Travis Gresham

200 E Wells St., Rm. 800

Milwaukee, WI 53202

tgresh@milwaukee.gov

RE: Licensee: 4295 Teutonia, Inc. dba Teutonia Food & Gas
Agent: Gurinder S. Nagra

Dear Attorney Gresham,

Please accept this letter as my acknowledgment of receipt of your letter, date November 6, 2024, as it relates to the ongoing pending licensing matter concerning my clients, 4295 N Teutonia, Inc. and Gurinder Nagra.

In an effort to remain cooperative with the City of Milwaukee, my client and I have reviewed your letter and have revised the witnesses that my client is requesting be called to provide witness testimony at their anticipated licensing hearing before the City of Milwaukee Licenses Committee, following the initial Summons provided to my client on or around October 8, 2024. Below you will find my client's amended request for subpoenas to be issued to **key witnesses**:

1. PO David Klein

Officer Klein was on scene during the August 16, 2023 incident and had submitted his written report of the incident. Officer Klein will provide relevant testimony and information pertaining to the August 16, 2023 incident.

2. PO Kyle Labensky

Officer Labensky was one of the first officers on scene during the August 16, 2023 incident. Officer Labensky will provide relevant testimony and information pertaining to the August 16, 2023 incident.

3. PO Travis Karweick

Officer Karweick was one of the first officers on scene during the August 16, 2023 incident. Officer Karweick will provide relevant testimony and information pertaining to the August 16, 2023 incident.

4. Sgt. Andres Cabral

Sgt. Cabral was on scene during the August 16, 2023 incident. Sgt. Cabral will provide relevant testimony and information pertaining to the August 16, 2023 incident.

5. PO Rafael Lopez

Officer Lopez was on scene during the August 16, 2023 incident. Officer Lopez will provide relevant testimony and information pertaining to the August 16, 2023 incident.

6. PO Daniel Parks

Officer Parks was on scene during the August 16, 2023 incident. Officer Parks will provide relevant testimony and information pertaining to the August 16, 2023 incident.

7. Lt. Hennessey of Milwaukee Fire Department Blue Shift

Lt. Hennessey of the Milwaukee Fire Department Blue Shift was the commander of MFD Med 5 and Engine 3 at the time of the incident and will provide relevant testimony and information pertaining to the August 16, 2023 incident.

8. Natalie Easter Allen

Ms. Easter Allen is the complainant that requested of the Licenses Committee to revoke the Licenses at the licensed establishment and will testify to relevant information concerning the August 16, 2023 incident.

9. Samarth Dhanju

Mr. Dhanju was an employee of Licensee at the time of the incident and will provide relevant testimony and information pertaining to the August 16, 2023 incident.

10. Krisham Singh

Mr. Singh was an employee of Licensee at the time of the incident and will provide relevant testimony and information pertaining to the August 16, 2023 incident.

11. Talwinder Singh-Gill

Mr. Singh-Gill was an employee of Licensee at the time of the incident and will provide relevant testimony and information pertaining to the August 16, 2023 incident.

12. William Pinkin

Mr. Pinkin is the alleged shooter from the August 16, 2023 and will provide relevant information pertaining to the August 16, 2023 incident.

13. A Representative of DaVita Wisconsin Avenue Dialysis

A representative of DaVita Wisconsin Avenue will provide relevant information pertaining to the alleged shooter's scheduling and managing of his appointments with DaVita Wisconsin Avenue Dialysis.

14. A Representative of Gold Star Transportation Inc.

A representative of Gold Star Transportation Inc. will provide relevant information pertaining to the alleged shooter's transportation arrangements to and from his dialysis appointments at DaVita Wisconsin Avenue Dialysis.

While my client intends to remain cooperative with the City concerning this matter, it must be stated that the claims raised by Ms. Easter Allen against my client contain serious accusations that can potentially lead to the my client's operating licenses being revoked by the City. The City's request to limit the number of witnesses at this licensing hearing significantly infringes on my client's constitutional protections, particularly the right to due process under the Fourteenth Amendment. This hearing, although administrative, is governed by constitutional standards, requiring that my client is granted a fair opportunity to present evidence and fully defend against the claims at issue.

Please contact me directly concerning my client's request for the subpoena of witnesses.

Very Truly Yours,

OVB Law & Consulting, S.C.

/s/

Emil Ovbiagele, JD, MBA
Attorney

OEO/*ab*

- cc. Alderwoman Andrea Pratt (via email, andrea.pratt@milwaukee.gov)
Alderwoman JoCasta Zamarripa (via email, jocasta.zamarripa@milwaukee.gov)
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