

**COMMITTEE ASSIGNMENTS**

**CHAIR**

- Licenses Committee

**VICE CHAIR**

- Zoning, Neighborhoods and Development



**MEMBER**

- Finance and Personnel Committee
- Library Board
- Neighborhood Improvement Development Corporation Board
- Special Joint Committee on the Redevelopment of Abandoned and Foreclosed Homes
- Steering and Rules Committee
- Wisconsin Center District Board

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

September 17, 2020

To the Honorable, the Common Council

Dear Members:

Re: Common Council File Number 200375

Attached are written objections to file number 200375, Motion relating to the recommendations of the Licenses Committee relative to licenses, relating to a recommendation of:

Nonrenewal, based upon the police report, and aldermanic and neighborhood testimony across all hearings, of the Extended Hours Establishments, Food Dealer, Filling Station, and Weights & Measures licenses for Kulwant Dhillon for the premises located at 3381 N 35th St (“35th Hometown”) in the 7th aldermanic district.

This matter will be heard by the full Council at its Tuesday, September 22, 2020 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,

A handwritten signature in black ink that reads "Milele A. Coggs".

Milele Coggs, Chair  
Licenses Committee

cc: All Council Members  
City Attorney's Office  
Common Council/City Clerk – License Division  
CCF 200375





**LAW & CONSULTING, S.C.**

September 16, 2020

**Emil Ovbiagele**  
emil@ovblaw.com

[via Email]  
City of Milwaukee City Hall  
Attn: Jim Owczarski, City Clerk  
200 E. Wells Street, Room 205  
Milwaukee, WI 53202  
jowcza@milwaukee.gov

**Re:** *Kool Petroleum, Inc. - 3381 N. 35th St*

Good Afternoon:

This Firm represents Kool Petroleum Inc. (Agent- Kulwant Dhilion) as it relates to the above-referenced matter. It must be noted that my client and this Firm only received the recent finding of facts and conclusions of law on September 16, 2020 and objects to timeliness of the provision of these findings.

Be that as it may, this letter is being sent to object to the Report of the Licensing Committee relating to the committee's hearing/findings. Further, we write to preserve client's rights to present oral arguments to the general common council relating to my client's objections at the September 22, 2020 general common council meeting.

My client objects to the committee's deliberations on several grounds. First, the City failed to comply with the notice provisions of Chapter 85 of the Milwaukee Ordinance. Second, the committee's decision was not based on substantial evidence. Third, the committee failed to appropriately notice some of the materials it considered as part of its deliberations. Fourth, the nature of the committee's proceedings, like before, violated our clients due process rights. The entire proceeding was an affront to fundamental due process and fairness. The committee's decision represented its will and not sound judgment in violation of pertinent laws.

Given that the committee's recommendation of non-renewal and the process, itself, failed to comport with recognized and applicable standards of law and was not supported by credible evidence, it is imperative that the findings of the committee not be left to stand. We request that the licenses in question be renewed. Feel free to reach out to me with any questions or concerns as it relates to this matter.

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414. 255. 3031 (fax)

Very Truly Yours,

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

*/s/*

Emil Ovbiagele, JD, MBA

*Attorney*

OEO/lb

cc: molly.kuether-steele@milwaukee.gov  
Client (via Email)  
Attorney Paul Oberer (via Email)