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

February 25, 2021

To the Honorable, the Common Council

Dear Members:

Re: Common Council File Number 200946

Attached are written objections to file number 200946, Motion relating to the recommendations of the Licenses Committee relative to licenses, relating to a recommendation of:

Nonrenewal, based on the police report, and police, aldermanic, and neighborhood testimony of the Class B Tavern, Food Dealer, and Public Entertainment Premises licenses for James Robinson for the premises located at 4323 N 60th St. ("Genes Supper Club") in the 2nd aldermanic district.

This matter will be heard by the full Council at its Tuesday, March 2, 2021 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,
Milele A. Coggs

Milele Coggs, Chair Licenses Committee

cc: All Council Members City Attorney's Office Common Council/City Clerk – License Division CCF 200946





Brennan Law Offices, L.L.C.

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Milwaukee, WI 53203
Telephone (414) 763-4200
Fax (414) 231-9810

February 24, 2021

Jim Owczarski City Hall – Room 205 200 E. Wells Street Milwaukee, WI 53202

Via Email: (jowcza@milwaukee.gov)

Re: Gene's Supper Club

Dear Mr. Owczarski:

On behalf of my client James Robinson, proprietor of *Gene's Supper Club | 423, LLCC*, by means of this letter I am filing formal objections to the Findings of Fact, Conclusions of Law and Recommendation which are embodied in the February 19, 2021 Report filed by the Utilities and Licenses Committee in the aftermath of the hearing conducted by that body on February 17th, 2021. I just received, via regular mail, a copy of the Committee's Report <u>yesterday afternoon</u>, **February 23rd**, 2021, and my clients' response is due to be filed by 4:45 p.m. <u>today</u>. Because that turn-around time is <u>grossly insufficient</u>, I am not in a position to offer particularized objections to the Committee's Report at this point in time and would reserve the right to supplement this filing with additional, more particularized, objections in the run-up to the March 2, 2021 hearing before the full Common Council.

What I can and will advise at this time is that the Findings of Fact, as embodied in the February 19th, 2021 Committee Report omit <u>important material facts</u>, whose exclusion inures to the profound and unlawful detriment of Mr. Robinson and his business entity. Moreover, to the extent that the Committee's Conclusions of Law and Recommendation are premised upon those unfairly and prejudicially circumscribed Findings of Fact, the

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Committee's determination to recommend non-renewal was and is arbitrary, capricious and unreasonable, and represents its will and not its judgment.

As previously stated, I reserve the right to supplement this letter with additional materials in the run-up to the March 2, 2021 hearing before the full Common Council.

Respectfully submitted,

BRENNAN LAW OFFICES, L.L.C.

/s/: Patrick Cavanaugh Brennan

PATRICK CAVANAUGH BRENNAN, ESQ. PCB:rjs

c.c. Molly Kuether-Steele (*via email: molly.kuether-steele@milwaukee.gov*) and James Robinson (*via: regular mail*)