

STATE OF WISCONSIN BEFORE THE ALCOHOL DANE COUNTY
LICENSE REVIEW COMMITTEE
OF THE CITY OF MADISON

CITY OF MADISON,

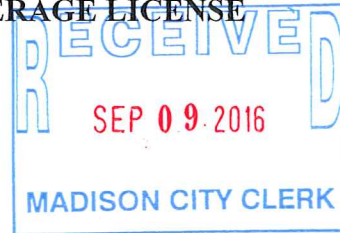
Complainant,

vs.

RB SCHULTZY LLC
d/b/a Baldwin Street Grille
1304 E. Washington Avenue
Madison, WI 53703

Respondent.

**REVOCAATION
OF CLASS "B" COMBINATION
ALCOHOL BEVERAGE LICENSE**



NOW COMES the City of Madison by Assistant City Attorney Jennifer Zilavy,
and alleges as follows, that:

1. The Complainant, Jennifer Zilavy, is an adult resident of the City of Madison, with a business address of 210 Martin Luther King Jr. Blvd., Madison, Wisconsin, and at all times material to this action, she was and is a member of Office Of The City Attorney in her official capacity.

2. The respondent herein, RB Schultzy LLC, Ryan Schultz, agent, is the alcohol beverage licensee doing business as Baldwin Street Grille, 1304 E. Washington Avenue, Madison, Wisconsin, according to documents filed with the City Clerk of the City of Madison.

3. The Common Council of the City of Madison first granted Respondent's Class B Combination Alcohol Beverage License for Baldwin Street Grille in 2013.

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4. The Common Council of the City of Madison granted a renewal of Respondent's Class B Combination Alcohol Beverage License for the period July 1, 2016 through June 30, 2017. At all times alleged in this Complaint, Respondent was the holder of a Class B Combination Alcohol Beverage License issued by the City of Madison.

5. On information and belief, Ryan B. Schultz, a member of RB Schultzy LLC and the liquor/beer agent for RB Schultzy LLC, under the City of Madison Class B Combination Alcohol Beverage License for the retail sale of alcohol beverages at the premises known as Baldwin Street Grille, 1304 E. Washington Avenue, Madison, Wisconsin, has violated Chapter 38, Madison General Ordinances ("MGO") as set forth below:

VIOLATION OF CHAPTER 38, MGO, WITHIN THE MEANING OF SEC. 38.10(1) (a) 6: The person does not possess the qualifications required under this chapter to hold the license,

and

WITHIN THE MEANING OF SEC. 38.05(4)(b): No license related to alcohol beverages may be issued to any person who has habitually been a law offender or has been convicted of a felony unless the person has been duly pardoned.

6.. Ryan Schultz, was convicted in Dane County Circuit Court of his fifth (5th) Operating a Motor Vehicle While Intoxicated ("OMVWI") Charge, a felony, on December 14, 2015. Schultz has not been pardoned from this offense.

7. Schultz's prior OMVWI convictions were in the years 2003, 2005 (two) and 2006. Schultz has had a total of four (4) criminal OMVWI convictions since 2003.

NOW, THEREFORE, for the above stated reasons and pursuant to Sec. 38.10(1) (a) 6, MGO, the complainant requests that the Common Council of the City of Madison REVOKE the combination Class B Alcohol Beverage License to sell fermented malt

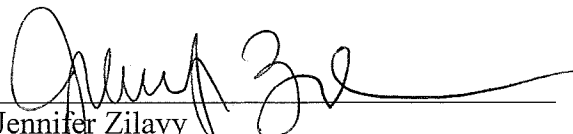
beverages and intoxicating liquors for the premises known as, RB Schultzy LLC, d/b/a
Baldwin Street Grille, 1304 E. Washington Avenue, Madison, Wisconsin.

STATE OF WISCONSIN)

) ss.

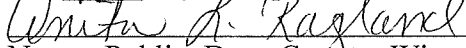
COUNTY OF DANE)

Assistant City Attorney Jennifer Zilavy, being duly sworn on oath, states that she has read the foregoing Complaint against RB Schultzy LLC, d/b/a Baldwin Street Grille, and that the statements are true of her own knowledge, except those which are stated upon information and belief, and as to such matters, she believes them to be true as they are based upon reports and records submitted by Madison Police Officers pursuant to their official duties.



Jennifer Zilavy
Assistant City Attorney

Subscribed and sworn to before me
this 9th day of September 2016.



Notary Public, Dane County, Wis.

My Commission expires: 10-16-16