

STATE OF WISCONSIN

BEFORE THE ALCOHOL
LICENSE REVIEW COMMITTEE
OF THE CITY OF MADISON

DANE COUNTY

CITY OF MADISON,

Plaintiff,

COMPLAINT

vs.

Zapl, LLC
dba City Bar and Restaurant
Adam Greenberg, Agent
636 State Street
Madison, WI

Respondent.

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

1. The complainant, Assistant City Attorney 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 has been an Assistant City Attorney for the City of Madison.

2. The respondent herein, Zapl, LLC, Adam Greenberg, agent, is the alcohol beverage licensee doing business as City Bar Restaurant and Bar, 636 State Street, Madison, Wisconsin, according to documents filed with the City Clerk of the City of Madison.

3. The Common Council of the City of Madison granted a Class B Combination Alcohol Beverage License to Zapl, LLC, Adam Greenberg, agent, for the premises located at 636 State Street, Madison, Wisconsin, for the period July 1, 2006 through June 30, 2007. 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.

On information and belief, the licensee, under the City of Madison Class B Combination Alcohol Beverage License for the retail sale of alcohol beverages, at the premises known as City Bar and Restaurant, 636 State Street, Madison, Wisconsin, has accumulated in excess of 200 points of alcohol beverage ordinance violations rendering any issuance of a Formal Expression of Concern, within the meaning of Sec.28.10(4)(d),Madison General Ordinances, inapplicable, to wit:

NOW, THEREFORE, for all the above stated reasons and pursuant to Sec.38.10(1)(a), Madison General Ordinances, the Complainant demands that the Common Council of the City of Madison suspend the Class B Combination Alcohol Beverage License issued to Zapl, LLC, 636 State Street, Madison, Wisconsin.

STATE OF WISCONSIN)
) ss.
COUNTY OF DANE)

City of Madison Assistant City Attorney, Jennifer Zilavy, being duly sworn on oath, states that she has read the foregoing Complaint against Zapl, LLC and that the statements are believed to be 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 by Madison Police Officers filed pursuant to their official duties.

Jennifer Zilavy
Assistant City Attorney

Subscribed and sworn to before me
this _____ day of May, 2007.

Notary Public, Dane County, Wis.
My Commission expires: _____