

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

CITY OF MADISON,

Plaintiff,

COMPLAINT

vs.

Grid LLC
Robert Sieger, Agent
d/b/a Grid Iron
1509 Monroe Street
Madson, WI

Respondent.

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

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, Grid LLC, Robert Sieger, agent, is the alcohol beverage licensee formerly doing business as the Grid Iron, 1509 Monroe 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 renewal of Respondent's Class B Combination Alcohol Beverage License for the premises located at 1509 Monroe Street, for the period July 1, 2009 through June 30, 2010.

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.

4. On August 4, 2009, the Madison Common Council granted Respondent's request for a "Change of Licensed Premise" changing the premise from a tavern to a hotel.

5. Respondent has not paid the fees for the 2009/2010 Class B Combination Alcohol Beverage License and as of February 23, 2010, the license remains in the possession of the Madison City Clerk's office.

6. 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 located at 1509 Monroe Street, has not been in business since November 2008, and thus, has not used its alcohol beverage license pursuant to Sec. 38.10(1)(f) of the Madison General Ordinances, as set forth in a Madison Police Department Lieutenant's report, to wit:

**DISCONTINUED USE OF CLASS A BEER/LIQUOR LICENSE
FOR A PERIOD OF MORE THAN FIFTEEN (15) DAYS OR MORE
WITHIN THE MEANING OF SEC. 38.10(1)(F), MADISON
GENERAL ORDINANCES**

1. 1509 Monroe Street is currently an abandoned construction site. No work has been done at this address since October, 2009. The hotel that is supposed to be built on this property is currently for sale. The lounge and café proposed for the hotel are also for sale or lease.

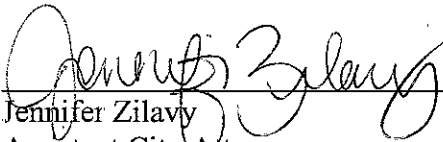
WHEREFORE, the complainant asserts that the Grid Iron, has not used its Class B Combination Alcohol Beverage license issued to it for the premise at 1509 Monroe

Street since November 2008, and that under Sec. 38.10(1)(f), the license is subject to cancellation due to nonuse.

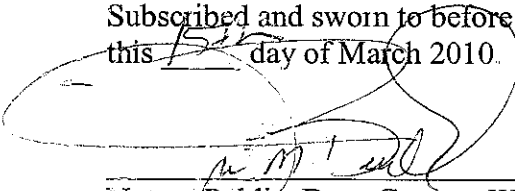
NOW, THEREFORE, for all the above stated reasons and pursuant to Sec.38.10(1)(f), Madison General Ordinances, the Complainant demands that the Common Council of the City of Madison cancel the Class B Combination Alcohol Beverage License issued to Grid LLC, d/b/a Grid Iron, 1509 Monroe Street, Madison, 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 Grid 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 official records of the City of Madison Clerk's Office and a real estate listing for the property.


Jennifer Zilavy
Assistant City Attorney

Subscribed and sworn to before me
this 15th day of March 2010.


Notary Public, Dane County, Wis.
My Commission expires: 3.11.12