



City of La Crosse, Wisconsin

City Hall
400 La Crosse Street
La Crosse, WI 54601

Meeting Agenda - Final

Judiciary & Administration Committee

Tuesday, June 9, 2026

5:00 PM

Grandad Conference Room
City Hall, First Floor

Special meeting

This meeting is open to in-person attendance only.

Call To Order

Roll Call

Members: Tamra Dickinson, Olivia Stine, Gary Padesky, Mackenzie Mindel, Jennifer Trost, Crystal Bedford, Lisa Weston

Deliberations following nonrenewal hearings per Wis. Stat. sec. 125.12

[26-0593](#)

Application of Chabolla Corp. dba Tequila's Mexican Restaurant, 515 West Ave. S. for a Combination "Class B" Beer and Liquor License for license year July 1, 2026 through June 30, 2027 and Notice of Intent to Not Renew.
(Note: The Committee and/or Council may convene in closed session pursuant to Wis. Stat. 19.85(1)(a) to deliberate its decision. Following such closed session, the Committees and/or Council may reconvene in open session.)

[26-0594](#)

Application of Mema Enterprises LLC dba Citgo on State, 1914 State Road, for a "Class A" Liquor License, Class "A" Beer License and Cigarette, Tobacco and Electronic Vaping Device License for license year July 1, 2026 through June 30, 2027 and Notice of Intent to Not Renew.
(Note: The Committee and/or Council may convene in closed session pursuant to Wis. Stat. 19.85(1)(a) to deliberate its decision. Following such closed session, the Committees and/or Council may reconvene in open session.)

Adjournment

Notice is further given that members of other governmental bodies may be present at the above scheduled meeting to gather information about a subject over which they have decision-making responsibility.

NOTICE TO PERSONS WITH A DISABILITY

Requests from persons with a disability who need assistance to participate in this meeting should call the City Clerk's office at (608) 789-7510 or send an email to ADAcityclerk@cityoflacrosse.org, with as much advance notice as possible.



City of La Crosse, Wisconsin

City Hall
400 La Crosse Street
La Crosse, WI 54601

Text File

File Number: 26-0593

Agenda Date: 6/5/2026

Version: 1

Status: New Business

In Control: Judiciary & Administration Committee

File Type: Application

Agenda Number:

NOTICE OF INTENT NOT TO RENEW LICENSE

Miguel Guerrero (Officer) and Luis Guerrero Chavolla (Agent) for Chabolla Corp. dba Tequila Mexican Restaurant, 515 West Ave. N., La Crosse, Wisconsin.

Basis for Intent to Not Renew

This is to notify you that the City of La Crosse intends to not renew the Combination "Class B" Beer and Liquor License issued to Chabolla Corp. for license year July 1, 2026 through June 30, 2027.

Pursuant to Wis. Stat. § 125.12(3), a municipality may refuse to renew a license for certain violations identified in § 125.12(2)(ag), including violations of municipal code or municipal regulations and maintaining a disorderly house.

The City of La Crosse alleges that the use of the establishment is interfering with public health and safety and is grounds for non-renewal of its Combination "Class B" Beer and Liquor License under Wis. Stat. § 125.12(2)(ag) for violations of municipal code or municipal regulations and for maintaining a disorderly house. This is supported by the following:

- (1) Violation of Resolution 44736 adopted August 13, 1987. This resolution established a general policy in connection with alcohol beverage licenses that three (3) violations of La Crosse Municipal Code and/or State laws per licensed establishment within a license year (July 1 through June 30 of the following year) shall be cause for a hearing before the Judiciary & Administration Committee as to whether the license should be suspended, revoked or non-renewed.

Chabolla Corp. dba Tequila Mexican Restaurant, 515 West Ave. N., committed and was convicted of three (3) violations in the current license year, July 1, 2025 through June 30, 2026, for sale of alcohol to underage individuals as follows:

- September 4, 2025, municipal ordinance citation: Ord. 4-7 Allow Underage in Bar. Per Municipal Court records, this citation resulted in a conviction on October 15, 2025. Matthew J. Memory (bouncer), Tequila Mexican Restaurant, 515 West Ave. N.
- February 25, 2026, municipal ordinance citation: Ord. 4-6 Sale/Furnish Liquor to Underage. Per Municipal Court records, the citation resulted in a conviction on April 1, 2026. Yolanda M. Hernandez Arquez (beverage server), Tequila Mexican Restaurant, 515 West Ave N.
- September 6, 2026, municipal ordinance citation: Ord. 4-7 Allow Underage in Bar. Per La Crosse County Circuit Court records, the citation resulted in a conviction on April 14, 2026. Luis Guerrero Chavolla (agent), Tequila Mexican Restaurant, 515 West Ave. N.

- (2) Violation of Chronic Nuisance Premises Abatement Plan Agreement. Representatives of the La Crosse Police Department and Chabolla Corp. (including Miguel Guerrero, owner, and Luis Guerrero Chavolla, agent) met on September 30, 2025 and agreed to a Chronic Nuisance Abatement Plan. Among other things, this plan requires the submission of monthly written reports to the Police Department detailing nuisance abatement. Chabolla Corp. has only submitted two (2) reports. Accordingly, Chabolla Corp. is in violation of the Abatement Plan for failing to submit the required monthly reports.

As part of the abatement process, City police have provided multiple alcohol compliance training sessions and opportunities to Chabolla Corp. and its employees, including beverage server trainings on July 17, 2024 and March 11, 2025.

- (3) Violation of Fire Code. During an inspection on December 4, 2025, the La Crosse Fire Department documented significant electrical issues at the establishment. This was communicated to Luis Guerrero Chavolla (agent), who was on site during the inspection. A follow-up inspection occurred on May 5, 2026; none of the previous electrical issues were fixed. The code issues were again communicated to

Luis Guerrero Chavolla, who was on site during the re-inspection. The electrical issues have not been corrected.

(4) Previous Violation of Resolution 44736. In 2024, the City issued Chabolla Corp a Notice of Intent to Not Renew License based on a violation of Resolution 44736 during the license year July 1, 2023 through June 30, 2024. Chabolla Corp. received the following three violations:

- August 31, 2023, municipal ordinance citation: Ord. 4-6 Sale/Furnish Liquor to Underage. Per Municipal Court records, this citation resulted in a conviction on September 12, 2023. Yolanda Hernandez (beverage server), Tequila Mexican Restaurant, 515 West Ave. N.
- February 1, 2024, municipal ordinance citation: Ord. 4-6 Sale/Furnish Liquor to Underage. Per Municipal Court records, the citation resulted in a conviction on February 7, 2024. Yolanda Hernandez (beverage server), Tequila Mexican Restaurant, 515 West Ave. N.
- April 5, 2024, municipal ordinance citation: Ord. 4-6 Sale/Furnish Liquor to underage. Per Municipal Court records, the citation resulted in a conviction on May 8, 2024. Franklin Flores Cruz (beverage server), Tequila Mexican Restaurant, 515 West Ave. N.

The City of La Crosse and Chabolla Corp entered into an agreement on June 4, 2024, and a non-renewal hearing did not occur. As part of this agreement, Chabolla Corp agreed to a ten (10) day license suspension and acknowledged that it was in violation of Municipal Code Sections 4-6 on three separate occasions in the license year July 1, 2023 to June 30, 2024.

(5) Significant Underage Activity. In addition to the above described violations, multiple incidents (bar checks) involving underage presence have occurred at the establishment over the past six (6) years. These violations include La Crosse Municipal Code Sections 4-7 (Allow Underage in Bar), 4-9 (Underage Possession/Consumption), 4-10 (Underage in Bar), and/or 4-11 (Underage Possession of False ID). The following are examples of these incidents and citations issued:

- September 19, 2025, La Crosse Police Department Case No. 10-25-42200: Five (5) underage consumption/underage related citations were written by officers and one Allowing Underage in Bar citation was issued.
- September 6, 2025, La Crosse Police Department Case No. 10-25-39979: Seventeen (17) underage consumption/underage related citations were written by officers.
- March 1, 2025, La Crosse Police Department Case No. 10-25-08482: Eighteen (18) underage consumption/underage related citations were issued by officers and two Allowing Underage in Bar citations were written by officers.
- September 19, 2024, La Crosse Police Department Case No. 10-24-42839: Four (4) underage consumption/underage related citations were written by officers.
- April 5, 2024, La Crosse Police Department Case No. 10-24-14531: Four (4) underage consumption citations were written by officers.
- August 31, 2023, La Crosse Police Department Case No. 10-23-41284: Two (2) underage consumption citations were written by officers.
- September 10, 2022, La Crosse Police Department Case No. 10-22-38673: Six (6) six underage consumption/underage related citations were written by officers.
- April 21, 2022, La Crosse Police Department Case No. 10-22-15650: Four (4) underage consumption/underage related citations were written by officers.

- December 10, 2021, La Crosse Police Department Case No. 10-21-52131: Five (5) underage consumption/underage related citations were written by officers.
- November 18, 2021, La Crosse Police Department Case No. 10-21-49256: Seven (7) underage consumption/underage related citations were written by officers.

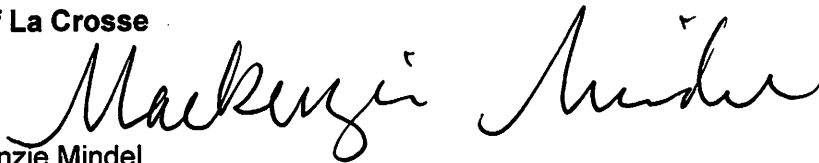
Your Rights as a License Holder

You have the right to a hearing to contest the nonrenewal of your license. Additionally, you have the right to be represented by an attorney at your own expense, the right to present evidence and testimony, and to cross-examine any witnesses produced by the City.

A nonrenewal hearing is scheduled for **Friday, June 5, 2026, at 9:00 a.m.** in the Council Chambers of La Crosse City Hall, 400 La Crosse Street, La Crosse, Wisconsin.

Dated: May 15, 2026

City of La Crosse



Mackenzie Mindel
Judiciary & Administration Chair

CC: Nikki Elsen, City Clerk
Stephen F. Matty, City Attorney

Form
AB-200

Alcohol Beverage License Application

For Municipal Use Only
Municipality
License Period

Application Type (check one)

Initial (New) Renewal

License(s) Requested: (up to two boxes may be checked)	Fees
<input type="checkbox"/> Class "A" Beer \$ _____	License Fee(s) \$ _____
<input checked="" type="checkbox"/> Class "B" Beer \$ _____	Background Check Fee \$ _____
<input type="checkbox"/> "Class A" Liquor \$ _____	Publication Fee \$ _____
<input checked="" type="checkbox"/> Regular "Class B" Liquor \$ _____	Total Fees \$ _____
<input type="checkbox"/> "Class A" Liquor (cider only) \$ _____	
<input type="checkbox"/> Reserve "Class B" Liquor \$ _____	
<input type="checkbox"/> "Class C" Liquor (wine only) \$ _____	
<input type="checkbox"/> Above-Quota "Class B" Liquor \$ _____	

Part A: Premises/Business Information

1. Legal Business Name (individual name if sole proprietorship)
Chabelle Corp.

2. Business Trade Name or DBA
Tequila Mexican Restaurant

3. FEIN 39-1970634 4. Wisconsin Seller's Permit Number 0000234741

5. Entity Type (check one)
 Sole Proprietor Partnership Limited Liability Company Corporation Nonprofit Organization

6. If the applicant business is an LLC, are the controlling members other LLCs or corporations? Yes No
If yes, the members, managers, officers and directors of those business entities must be listed in Part C and provide a Form AB-100.

7. State of Organization 8. Date of Organization 9. Wisconsin DFI Registration Number

10. Premises Address
515 West Ave N

11. City La Crosse 12. State WI 13. Zip Code 54601

14. County La Crosse 15. Governing Municipality: City Town Village
of La Crosse

16. Aldermanic District

17. Premises Phone 608-796-2961 18. Premises Email 19. Website

20. Premises Description
Initial (New Applicants Only): Describe the building or buildings where alcohol beverages are produced, sold, stored, or consumed, and related records are kept. Describe all rooms within the building, including living quarters. Authorized alcohol beverage activities and storage of records may occur only on the premises described in this application. Attach a map or diagram and additional sheets if necessary.
Renewal Applicants Only: I am renewing a license and by checking the box following this statement, I affirm that I have reviewed the last issued license certificate and the premises description remains the same.

21. Mailing Address (if different from premises address)

22. City 23. State 24. Zip Code

Part B: Questions

1. Has the business (sole proprietorship, partnership, limited liability company, or corporation) been convicted of violating federal or state laws or local ordinances? Exclude traffic offenses unless related to alcohol beverages. Yes No
If yes, list the details of violation below. Attach additional sheets if necessary

Law/Ordinance Violated	Location	Trial Date
Penalty Imposed	Was sentence completed? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Law/Ordinance Violated	Location	Trial Date
Penalty Imposed	Was sentence completed? <input type="checkbox"/> Yes <input type="checkbox"/> No	

2. Are charges for any offenses pending against the business? Exclude traffic offenses unless related to alcohol beverages. Yes No

If yes, describe the nature and status of pending charges using the space below. Attach additional sheets as needed.

3. Is the applicant business or any of its officers, directors, members, agent, employees, owners, or other related individuals or entities a restricted investor with any interest in an alcohol beverage producer or wholesaler? Yes No

If yes, provide the name of the restricted investor and describe the nature of the interest.

4. Have the partners, agent, or sole proprietor satisfied the responsible beverage server training requirement for this license period? Submit proof of completion. Yes No

5. Is the applicant business indebted to any wholesaler beyond 15 days for beer or 30 days for liquor/wine? Yes No

6. Does the applicant business owe past due municipal property taxes, assessments, or other fees? Yes No

Part C: Individual Information

Check each box to attest that you have provided the appropriate supplementary information to complete your application. See the instructions for Part C of this application, beginning on page 2, to complete this section.

I have accurately listed and provided contact and personal information for all required persons involved in the applicant business and any business identified in Part A, Question 6 using Form AB-200AA.

I have provided an accurate Form AB-100 for each person listed in Form AB-200AA.

(For corporations, limited liability companies, and nonprofit organizations only) I have provided an accurate Form AB-101 to appoint an agent on behalf of my business.


I understand that my application is not complete until this supplementary paperwork is received by the municipal clerk where I am applying for an alcohol beverage license.

Part D: Attestation

One of the following must sign and attest to this application:

- sole proprietor
- one general partner of a partnership
- one corporate officer
- one member of an LLC

READ CAREFULLY BEFORE SIGNING: Under penalty of law, I have answered each of the above questions completely and truthfully. I agree that I am acting solely on behalf of the applicant business and not on behalf of any other individual or entity seeking the license. Further, I agree that the rights and responsibilities conferred by the license(s), if granted, will not be assigned to another individual or entity. I agree to operate this business according to the law, including but not limited to, purchasing alcohol beverages from state authorized wholesalers. I understand that lack of access to any portion of a licensed premises during inspection will be deemed a refusal to allow inspection. Such refusal is a misdemeanor and grounds for revocation of this license. I understand that any license issued contrary to Wis. Stat. Chapter 125 shall be void under penalty of state law. I further understand that I may be prosecuted for submitting false statements and affidavits in connection with this application, and that any person who knowingly provides materially false information on this application may be required to forfeit not more than \$1,000 if convicted.

Last Name Guerrero	First Name Miguel	M.I. A
Title Sole Member	Email	Phone
Signature 		5108126

Part E: For Clerk Use Only

Date Application Was Filed With Clerk	License Number	Date License Granted	Date License Issued
Signature of Clerk/Deputy Clerk		Date Provisional License Issued (if applicable)	

License Number	License Type	Business Name	DBA	Business Address
ALC007891-05-2025	Combination "Class B" Beer & Liquor	CHABOLLA CORP	TEQUILA MEXICAN RESTAURANT	515 WEST AVE N

Sales and Service Description: *One-story concrete stucco building on first floor, approximately 3,500 square feet and beer garden.*

Storage Description: *First floor and basement.*

Business License Contacts

Name	Address	Business Phone	Mobile Phone	Home Phone	Contact Type(s)
MIGUEL ANGEL GUERRERO	1456 CAMINITO SARDINIA CHULA VISTA, CA 91915				President
LUIS ANTONIO GUERRERO CHAVOLLA	1333 RIDGEWAY ONALASKA, WI 54650				Agent



La Crosse Fire Department Inspection Report



Fire Department Information

Inspection Number: 20250422413
Inspector Name: Zurawski, Isaac

Inspection Date: 04/21/2025

Facility Information

Occupant Name: Tequila's Mexican Restaurant

Inspection Information

Date Completed: 04/21/2025

Inspection Type: Re-Inspection

Table with 5 columns: Code, Description, Comments, Re-inspection Date, Repaired Date. Contains 5 rows of inspection data including violations for multiplug adapters, interior finish, extension cords, and emergency lighting.

(5) Stair shaft and vestibule of smokeproof enclosures, for which the following also apply:
 (a) The stair shaft and vestibule shall be permitted to include a standby generator that is installed for the smokeproof enclosure mechanical ventilation equipment.
 (b) The standby generator shall be permitted to be used for the stair shaft and vestibule emergency lighting power supply.
 (6) New access-controlled egress doors in accordance with 14.5.3.2 [101:7.9.1.1]

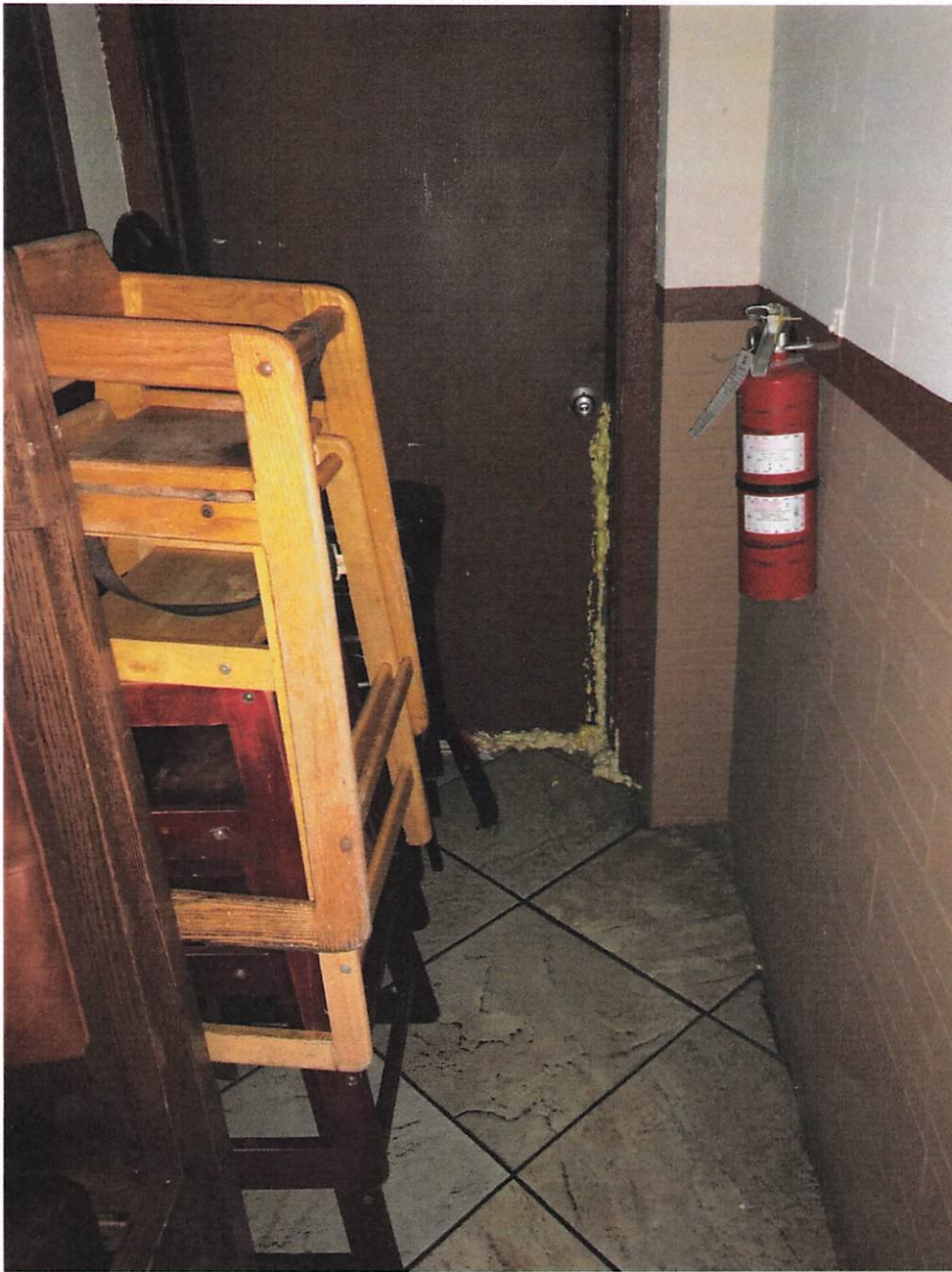
4.4.3.1.1	In every occupied building or structure, means of egress from all parts of the building shall be maintained free and unobstructed.		03/30/2025
11.1.2	All electrical appliances, fixtures, equipment, or wiring shall be installed and maintained in accordance with NFPA 70, National Electrical Code.		03/30/2025
63.3.1.8.4	Securing Compressed Gas Containers, Cylinders, and Tanks. - Compressed gas containers, cylinders, and tanks in use or in storage shall be secured to prevent them from falling or being knocked over by corralling them and securing them to a cart, framework, or fixed object by use of a restraint, unless otherwise permitted by 63.3.1.8.4.1 and 63.3.1.8.4.2. [55:7.1.8.4]		03/30/2025
50.4.6.1	Upon activation of any fire-extinguishing system for a cooking operation, all sources of fuel and electric power that produce heat to all equipment requiring protection by that system shall automatically shut off. [96:10.4.1]	Employee stats that it is broken and the stove turns off so he has to move the switch back to the open position so he can keep cooking. Adan	03/29/2025
63.3.1.8.4	Securing Compressed Gas Containers, Cylinders, and Tanks. - Compressed gas containers, cylinders, and tanks in use or in storage shall be secured to prevent them from falling or being knocked over by corralling them and securing them to a cart, framework, or fixed object by use of a restraint, unless otherwise permitted by 63.3.1.8.4.1 and 63.3.1.8.4.2. [55:7.1.8.4]		
11.1.7.6	Extension cords shall not be used as a substitute for permanent wiring.		
12.4.1	The installation and maintenance of assemblies and devices used to protect openings in walls, floors, and ceilings against the spread of fire and smoke within, into, or out		

of buildings shall comply with Section 12.4 and NFPA 80, Standard for Fire Doors and Other Opening Protectives. [80:1.1]

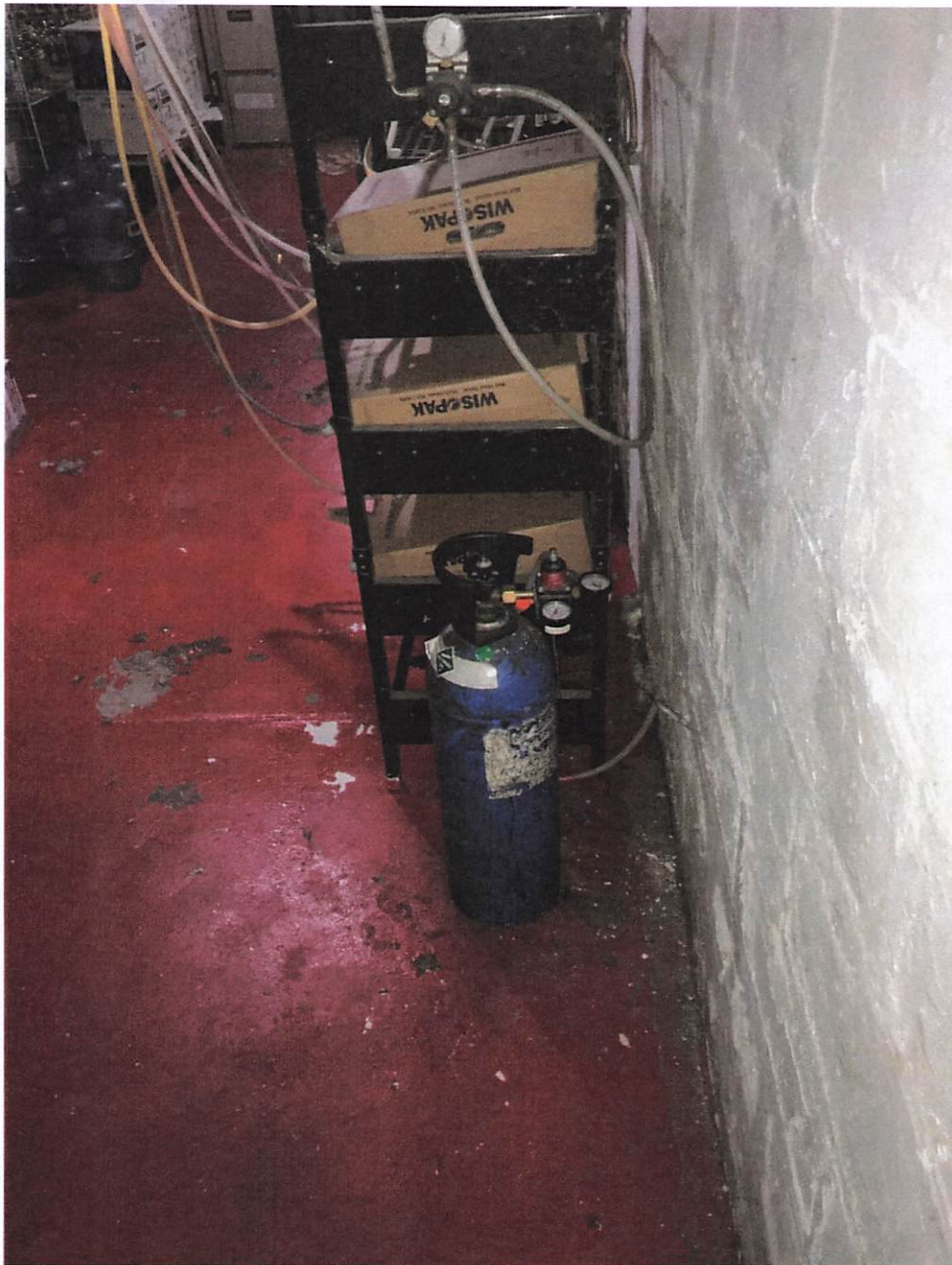
Violation Documents





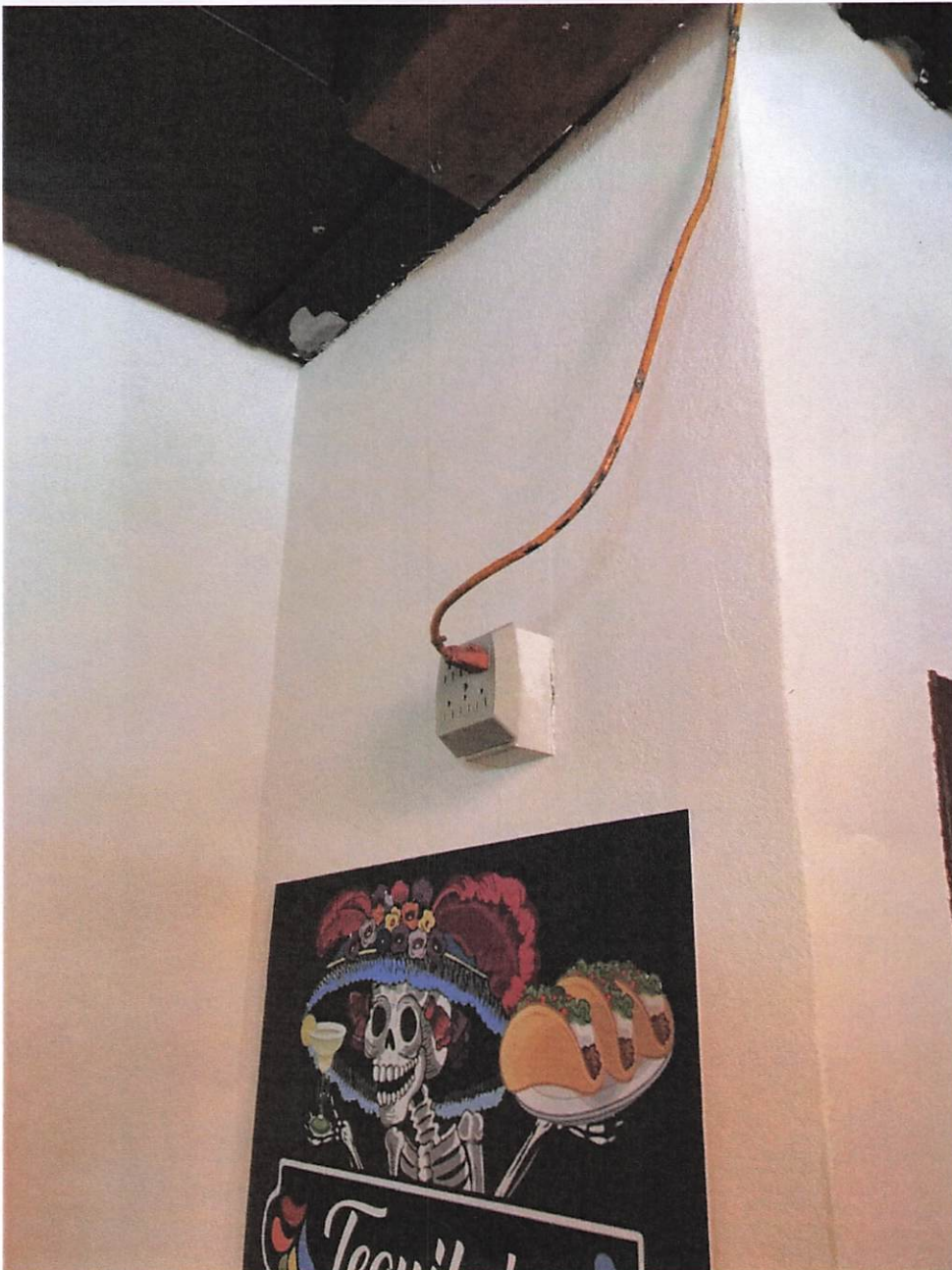


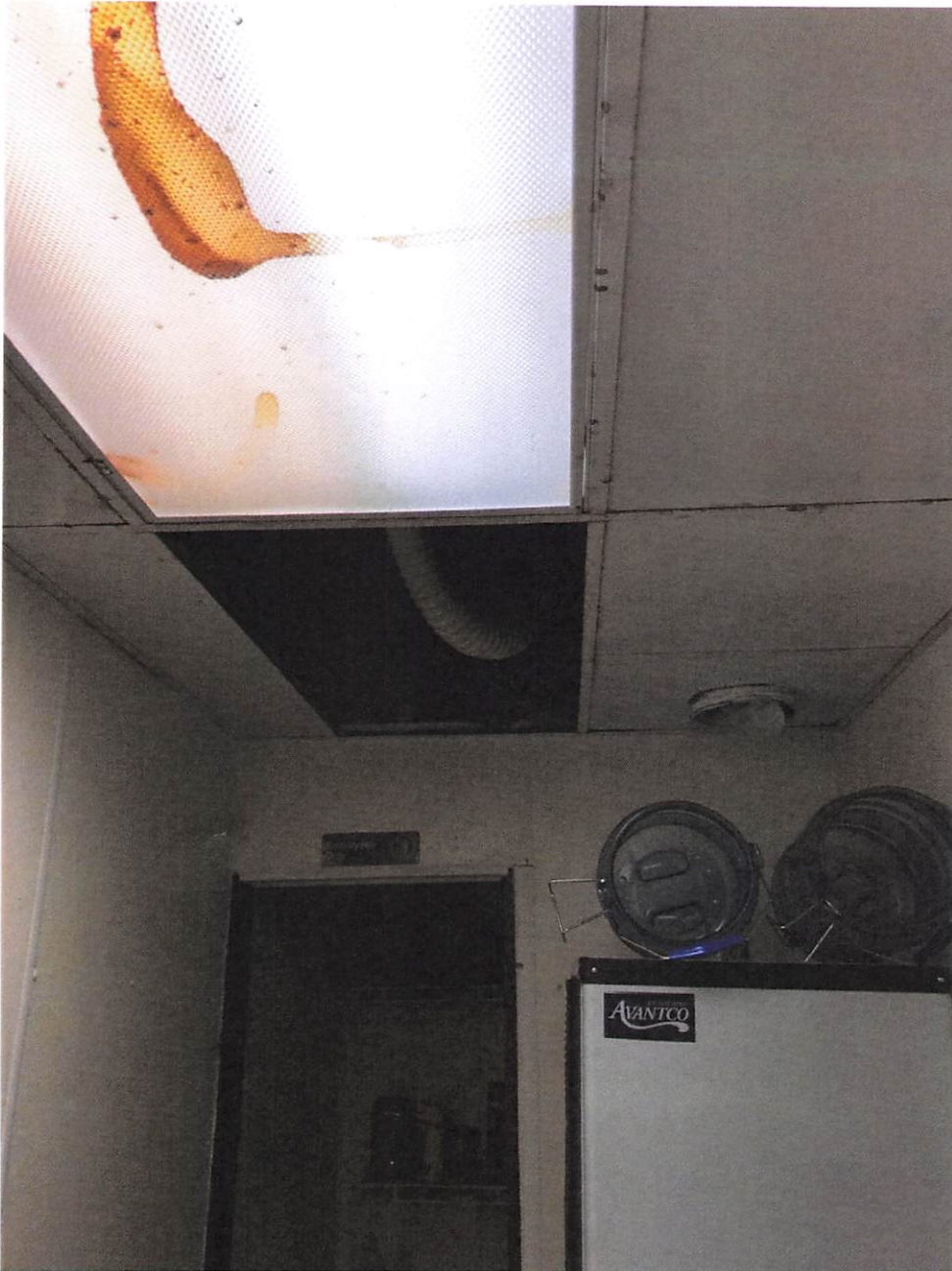












Inspection Notes:

Inspection Documents

Questions? Contact the LCFD Division of Community Risk Management at Fireinspections@cityoflacrosse.org or 608-789-7271



La Crosse Fire Department Inspection Report

Fire Department Information

Inspection Number: 202506232047
Inspector Name: Zurawski, Isaac

Inspection Date: 12/04/2025

Facility Information

Occupant Name: Tequila's Mexican Restaurant

Inspection Information

Date Completed: 12/04/2025

Inspection Type: Semi-Annual

Table with 3 columns: Code, Description, Re-inspection Date. Contains three rows of violation details including codes like 11.1.10 and 63.3.1.8.4.

Violation Documents

Inspection Notes:

Inspection Documents

Signatures

Table with 4 columns: Type, First Name, Last Name, Signature Date. Includes a signature box with a handwritten signature.

Questions? Contact the LCFD Division of Community Risk Management at Fireinspections@cityoflacrosse.org or 608-789-7271



La Crosse Fire Department Inspection Report

Fire Department Information

Inspection Number: 202512233908
Inspector Name: Zurawski, Isaac

Inspection Date: 05/05/2026

Facility Information

Occupant Name: Tequila's Mexican Restaurant

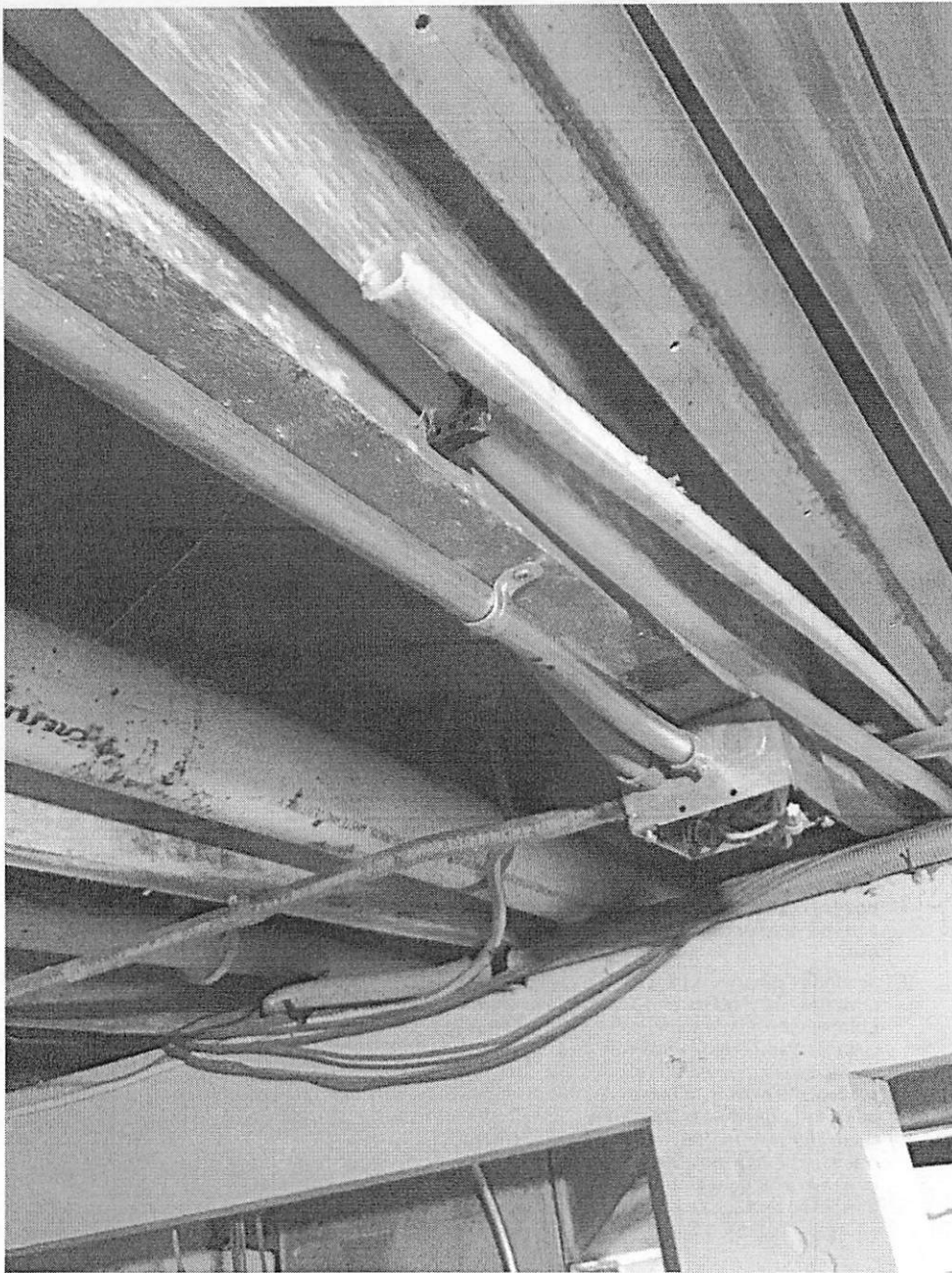
Inspection Information

Date Completed: 05/05/2026

Inspection Type: Semi-Annual

Table with 4 columns: Code, Description, Violations/Comments, Re-inspection Date. Contains 5 rows of inspection findings related to electrical safety and gas cylinder securing.

Violation Documents



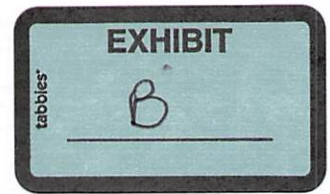
Inspection Notes:

Inspection Documents

Signatures

Type	First Name	Last Name	Signature Date
Inspector	Isaac	Zurawski	05/05/2026

Questions? Contact the LCFD Division of Community Risk Management at Fireinspections@cityoflacrosse.org or 608-789-7271



**STIPULATION REGARDING ALCOHOL NONRENEWAL LICENSE(S)
PROCEEDINGS WITH CHABOLLA CORP., D/B/A TEQUILA MEXICAN
RESTAURANT**

Background

In May 2024, the City of La Crosse sought the nonrenewal of the Chabolla Corp.'s, d/b/a Tequila Mexican Restaurant, alcohol license(s) for failure to comply with La Crosse Municipal Code Section 4-6 sale of alcohol to underage. The code adopts the provisions of Wis. Stat. § 125.07(1) which governs alcohol beverages and restrictions relating to underage persons. The "Notice of Intent to Not Renew License" document on file as Legislative Item 24-0704 more specifically details the violations and is incorporated by reference.

Pursuant to Wis. Stat. § 125.12(3), a municipality may refuse to renew a license for certain enumerated violations listed in Wis. Stat. 125.12(2)(ag), which includes certain violations of municipal code or municipal regulation.

Agreement

The City of La Crosse ("The City") and Chabolla Corp., d/b/a Tequila Mexican Restaurant ("Tequila's") agree to the following:

1. Tequila's acknowledges that it was in violation of Code Sections 4-6 on three separate occasions in the license year July 1, 2023 to June 30, 2024. Tequila's has taken efforts in response to the pending nonrenewal of its alcohol license(s) to comply with alcohol regulations.
2. The parties agree that Tequila's alcohol license(s) may be renewed for license year July 1, 2024, through June 30, 2025, with the following conditions:
 - a. The license(s) will be suspended for a period of ten (10) days beginning July 1, 2024.
 - b. Alcohol education training with the City of La Crosse Police Department must be completed within sixty (60) days, unless the Police Department agrees to extend the time.
 - c. That an abatement meeting with signed abatement plan with the City of La Crosse Police Department must be completed within sixty (60) days, unless the Police Department agrees to extend the time.
 - d. All servers at Tequila's must obtain City beverage operator license (commonly referred to as "bartender license") within sixty (60) days. Any newly hired servers should be licensed within sixty (60) days of employment.
 - e. Signage shall be displayed at the entry and on tables that Tequila's checks IDs. The City Clerk may be consulted and can provide language for such signage. Implementation is to be completed as soon as possible but no later than July 11, 2024.

f. If Tequila's receives three (3) alcohol related violations during the 2024 – 2025 license year, its alcohol license(s) will be automatically revoked for the duration of the license year, upon notice and without hearing.

g. Tequila's will comply with all applicable state and local laws.

3. The City will cease its May and June 2024 nonrenewal efforts as it relates to Tequila's alcohol license(s).

Signature of Parties

Signing on Behalf of the City's Legal Department:



Ellen R. Atterbury
La Crosse Assistant City Attorney

6/4/24

Date

Signing on Behalf of Chabolla Corp.:



Jessica T. Kirchner
Attorney for Chabolla Corp.

6/4/24

Date



Miguel Guerrero (Jun 4, 2024 14:13 CDT)

Miguel Guerrero
Registered Agent for Chabolla Corp.

Jun 4, 2024

Date



AFFIDAVIT OF HANNAH BOLDEBUCK

STATE OF WISCONSIN)
) ss.
COUNTY OF LA CROSSE)


Hannah Boldebeck, being first duly sworn, on oath, states as follows:

1. I am a first-year student at the University of Wisconsin-La Crosse, and I make this affidavit based on my own personal knowledge.
2. I am currently 18 years old, and my date of birth is December 31, 2006. I live in the City of La Crosse, Wisconsin.
3. I received citations for being underage in a bar and possession/consumption of alcohol 17-20 at Tequila's Bar & Grill ("Tequila's"), reference Case No. 10-25-39979, on September 6, 2025. Several of my friends, all under the age of 21 and most of whom are first-year students, were also present at Tequila's that night and consumed alcohol on premises.
4. Upon information and belief, Tequila's is well-known among college students in La Crosse as being easy for underage adults to be admitted and purchase and consume alcohol on the Tequila's premises. I became aware of this reputation from classmates of a similar age. It is known that you need to have some form of identification showing that you are above 21 years old, but the employees checking IDs have a reputation for not really looking at the IDs or check to see if the ID matches the person showing the ID.
5. When I received the citation on September 6, 2025, that was the second time I had been to Tequila's. The first time I was at Tequila's was the day before, September 5, 2025.
6. On September 6, 2025, I went to Tequila's with people that I knew to be underage.
7. When I entered Tequila's on September 6, 2025, there was not any bouncer or ID checker there. I went to the left when I entered Tequila's, which is where the Bar Only area is located,

and there was an employee near the bar area. The employee asked to see IDs. I handed him a fake ID that looked similar to a Wisconsin driver's license. The process of having my ID checked by the employees was extremely fast. Based on my recollection, my ID was not scanned. I was never asked for a second form of ID or asked my date of birth.

8. On both September 5 and September 6, 2025, I never observed bartenders at Tequila's requesting ID from patrons when ordering alcoholic beverages, nor have I ever seen or heard of someone presenting ID to a bartender. Both my friends and I have ordered alcoholic beverages from Tequila's.

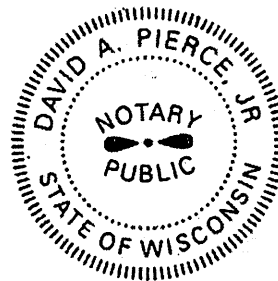
Further Affiant Sayeth Not.


Hannah Boldebuck

Subscribed and sworn to before me
this 30 day of October, 2025.

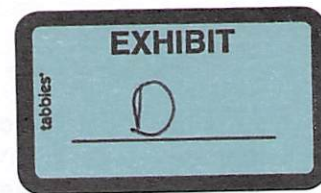


Notary Public, State of Wisconsin
My Commission: 15 Permaent.





LA CROSSE
POLICE DEPARTMENT
LEAD. PARTNER. PROTECT.



September 17, 2025

Luis Guerrero, Agent
Chabolla Corp
d/b/a Tequila Mexican Restaurant
515 West Avenue North
La Crosse, WI 54601

RE: Nuisance Premise at 515 West Avenue North (Tequila Mexican Restaurant)

Dear Miguel Guerrero & Luis Guerrero:

This letter is regarding property that you own and/or operate at the above address in the City of La Crosse. Per Chapter 30.28 of La Crosse City Ordinance, this property meets the definition of a chronic nuisance premise.

Since September 1, 2024, police have responded to 515 West Avenue North (Tequila Mexican Restaurant) for 34 calls, of which four are deemed "nuisance" calls that produced 45 citations to include Allow Underage in a Bar (ordinance 4-7), Underage in a Bar (ordinance 4-10), and Underage Possession/Consumption of Alcohol (ordinance 4-9).

As the owner of the property, the law places a burden on you to ensure that the public nuisance is stopped. This notice is being provided to give you an opportunity to do so. If you fail to act under Chapter 30 Article II, as the property owner, you may be subject to the following:

1. Citation(s) for Maintaining a Public Nuisance, with fines not less than \$100 nor more than \$1,000, together with the cost of prosecution for the first offense and not less than \$200 nor more than \$5,000, together with the cost of prosecution for subsequent violations.
2. Bill(s) for police, fire, and inspection services at the property due to your failure to eliminate the nuisance activity. If not paid, the bill amounts may be assessed as a special charge against the premises. An appeal for this bill may be submitted to the City Clerk.
3. Additional legal action against the owner/property by the City through Circuit Court.

You are hereby ordered to attend a meeting to discuss the abatement of the above-mentioned property on September 30, 2025, at 10 a.m. at La Crosse City Hall 400 La Crosse St. La Crosse, WI 54601. Failure to attend this abatement meeting could result in you receiving a citation pursuant to the La Crosse Municipal Code. Enclosed with this letter are the listings of occurrences from the police department, a copy of the Chronic Nuisance Ordinance, and an Abatement Plan that will be reviewed with you during the meeting on September 30th.


Hopefully the above penalties will not be necessary. We are willing to assist you in resolving this situation. Please contact Lt. Steve Pataska (608-789-7205) within the next five days to confirm your attendance at the meeting or to set a new meeting date if you are unable to

attend the scheduled meeting. Please feel free to contact me prior to the meeting with any questions or concerns. Our experience has shown that prompt attention to these matters can help you avoid legal consequences.

Sincerely,

Shawn P. Kudron
Chief of Police

By:

A handwritten signature in black ink, appearing to read 'S. Pataska', written over a horizontal line.

Steve Pataska
Lieutenant – Professional Standards/Community Services Bureau
Desk: 608-789-7205
pataskas@cityoflacrosse.org

Nuisance Abatement Plan

Address: 515 West Avenue North La Crosse WI 54601

Property Owner: Miguel Guerrero

Meeting Date: September 30, 2025

Property Owner Agrees to:

- All employees attend server training through the La Crosse Police Department TiPS® Trainers (responsible beverage server training). All employees include those who serve food and beverages, including bar tenders, hosts, and wait staff.

Complete by: Within 3 months, and ongoing with new hires

- Require Staff to check personal identification (driver's license) of all patrons entering the establishment that appear to be 30 years of age or younger.

Complete by: Immediately

- Request a second form of identification from any patron that appears to be underage and/or is presenting a possible fake ID. This will include a passport or birth certificate.

Complete by: Immediately

- Contact the police department immediately upon notice of any state or municipal law violations. Cooperate with investigations, including bar checks and compliance checks conducted by the police department.

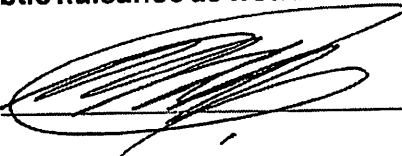
Complete by: Immediately

- Provide a monthly written report to the police department, addressed to Sergeant D. Mandujano, outlining progress with the abatement plan.

****This list is not all inclusive and more requirements may be added to the abatement plan at a later date as a result of the scheduled meeting.****

I will make a good faith effort to comply with the above goals and abate the nuisance. I understand that if corrective actions are not taken, as the owner, I may be issued citations for maintaining a public nuisance as well be assessed the cost of future police services to my property.

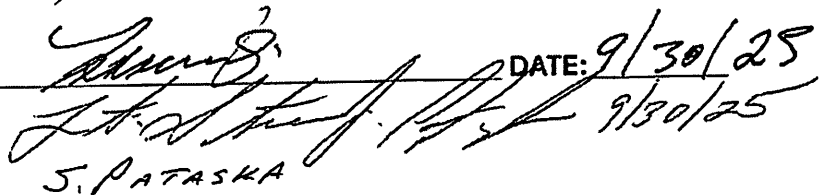
Signature of Property Owner:



DATE:

9/30/25

Signature of City Representative:



J. PATASKA

DATE:

9/30/25

FEBRUARY 2026



TEQUILA MEXICAN RESTAURANT ABATEMENT PLAN

Date	Day of Week	Total Customers	Turned Away (Underage/Invalid ID)	IDs Confiscated	Law Enforcement Contacted	Notes
	1		NO			
	2		NO			
	3		YES			
	4		NO			
	5		1			TOOK 2 PERSON OUT DENIED 1 ID CUSTOMER LEFT
	6		NO			
	7		NO			
	8		NO			
	9		NO			LEFT AFTER DENIED DENIED
	10		NO			LEFT after denied Underage
	11		NO			
	12		NO			
	13		NO			
	14		NO			
	15		NO			
	16		NO			
	17		NO			
	18		NO			
	19		NO			
	20		NO			
	21		NO			
	22		NO			
	23		NO			
	24		NO			
	25		2			
NOTES:						
New Employees Hired						
First Name		Last Name	Date of Hire	Trained in Responsible Beverage (Y/N)	Licensed (Y/N)	

26	NO	NO	NO
27	NO	NO	NO
28	NO	NO	NO

Two undercover came in and were ~~denied~~ denied

APRIL 2026

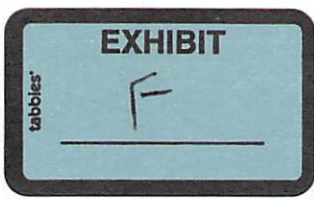
TEQUILA MEXICAN RESTAURANT ABATEMENT PLAN

Date	Day of Week	Total Customers	Turned Away (Underage/Invalid ID)	IDs Confiscated	Law Enforcement Contacted	Notes
4/1/26			2	2	YES	TOOK 2 CUSTOMER OUT
4/2/26			φ	φ	φ	φ
4/3/26			φ	φ	φ	φ
4/8/26			φ	φ	NO	DENIED OFFER
4/15/26			φ	φ	φ	φ
4/16/26			φ	φ	φ	φ
4/17/26			φ	φ	φ	φ
4/18/26			5	φ	NO	NO ID, CAME TO BAR DENIED
4/19/26			φ	φ	φ	φ
4/20/26			φ	φ	φ	φ
4/21/26			4	φ	NO	LEFT AFTER DENIED
4/22/26			φ	φ	NO	LEFT AFTER DENIED
4/23/26			φ	φ	φ	φ
4/24/26			φ	φ	φ	φ
4/25/26			φ	φ	φ	φ
4/26/26			φ	φ	φ	φ
4/27/26			φ	φ	φ	φ
4/28/26			φ	φ	φ	φ
4/29/26			φ	φ	φ	φ
4/30/26			6	φ	NO	DENIED 6 IDs
4/21/26			φ	φ	φ	φ
4/22/26			φ	φ	φ	φ
4/23/26			φ	φ	φ	φ
4/24/26			φ	φ	φ	φ
4/25/26			φ	φ	φ	φ
4/26/26			φ	φ	φ	φ
4/27/26			φ	φ	φ	φ
4/28/26			φ	φ	φ	φ
4/29/26			φ	φ	φ	φ
4/30/26			φ	φ	φ	φ

NOTES:

New Employees Hired		Last Name	Date of Hire	Trained in Responsible Beverage (Y/N)	Licensed (Y/N)
First Name					

MARIA MARTINEZ
608-799-8447



INCIDENT #: 25-08482
CONTAINS JUVENILE INFO:

LA CROSSE POLICE DEPARTMENT ver. 10

REPORT DATE: 03/01/2025

REPORT TIME: 9:47 p.m.

REPORT TYPE: INITIAL

SUPPLEMENTAL

CALL TYPE PER CAD: Bar Check

LOCATION: Tequila's Mexican Restaurant – 515 West Avenue North, La Crosse, Wisconsin 54601

INCIDENT DATE/TIME: 03/01/2025 at 9:47 p.m.

OFFICER/BADGE NUMBER: Officer Jelinski/2543
SUPERVISOR APPROVING REPORT & BADGE NUMBER: Sgt. Whitney Hughes/ 2760

SQUAD # & VIDEO: Squad 35/Body-Worn Camera Working
PHOTOS:

COPIES TO (DA's Office, Social Services, etc.):

MC 3/12/25 NS

List ALL Victims, Complainants, Witnesses, Others, Arrested WITH all charges listed, statutes, AND was the person JAILED/SIG-BONDED/CITED AND RELEASED:

OTHER:

Miguel A. Guerrero

Male/Hispanic

DOB: [REDACTED]

Height: [REDACTED]

Weight: [REDACTED]

Hair: [REDACTED]

Eyes: [REDACTED]

Address: [REDACTED]

Phone Number: [REDACTED]

Employment: Owner of Tequila's

School: Unknown

OTHER/(Cited):

Tequila's Bar and Grill

Address: 515 West Avenue North, La Crosse WI, 54601

Phone: [REDACTED]

CITATION:

4-7 – Allowing Underage Person in a Bar

OTHER/(Cited):

Noah M. Coleman

Male/White

DOB: [REDACTED] 2006

Height: [REDACTED]

Weight: [REDACTED]

Hair: [REDACTED]

Eyes: [REDACTED]

Address: [REDACTED]
Phone Number: Unknown
School: University of Wisconsin – La Crosse
Employment: Bouncer at Tequila's

CITATION:
4-7 – Allowing Underage Person in a Bar

OTHER/(Cited):

Devon A. Bostwick
Male/White
DOB: [REDACTED] 2007
Height: [REDACTED]
Weight: [REDACTED]
Hair: [REDACTED]
Eyes: [REDACTED]
Address: [REDACTED]
Phone Number: [REDACTED]
School: None

CITATION:
4-9 – Possession/Consumption of Alcohol Underage (17-20) (3rd Offense)

OTHER/(Cited):

Brenden J. Vaughan
Male/White
DOB: [REDACTED] 2005
Height: [REDACTED]
Weight: [REDACTED]
Hair: [REDACTED]
Eyes: [REDACTED]
Address: [REDACTED]
Phone Number: [REDACTED]
School: [REDACTED]

CITATION:
4-9 – Possession/Consumption of Alcohol Underage (17-20)

OTHER/(Cited):

Troy W. Davis
Male/White
DOB: [REDACTED] 2006
Height: [REDACTED]
Weight: [REDACTED]
Hair: [REDACTED]
Eyes: [REDACTED]
Address: [REDACTED]
Phone Number: [REDACTED]
School: University of Wisconsin – La Crosse

CITATION:

4-9 – Possession/Consumption of Alcohol Underage (17-20)

PROPERTY (only property not entered through the evidence module):

CRIME VICTIM SHEET PROVIDED (Y/N):

ACT 268:

WEAPON(S) USED (Y/N):

Description of weapon(s):

How weapon is involved:

Where is the weapon now/who has possession (their information):

Are there other weapons:

Prior concerns with weapons in the past (gathered from witnesses, complainant, consumer themselves):

ASSOCIATED CHARGES:

BIAS:

VICTIM TO OFFENDER RELATIONSHIP:

DOMESTIC RELATED (Y/N):

DOMESTIC LETHALITY ASSESSMENT (Y/N):

DOMESTIC QUALIFIERS:

NEW HORIZONS CONTACTED (Y/N):

NO CONTACT WITH:

SUPPLEMENTAL INVESTIGATION REQUESTED (detail below):

SUMMARY:

On March 1, 2025 at 9:47 p.m., a bar check was completed at Tequila’s Mexican Restaurant, at 515 West Avenue North in the City of La Crosse. In total, 18 underage consumption citations were written by officers and two allowing underage in a bar citations were written by officers during this bar check. No further follow up is needed with this initial report. See all other officers’ supplemental reports for further details.

NARRATIVE:

INITIAL OBSERVATIONS:

On March 1, 2025 at 9:40 p.m., I initiated a traffic stop on a vehicle at West Avenue and La Crosse Street for no lights. The vehicle proceeded past the intersection and all the way down to Tequila’s Restaurant, at 515 West Avenue North, which is to the south of West Avenue in La Crosse. It then pulled into the Tequila’s front parking lot and parked. I had my emergency lights activated and went on with the traffic stop portion, where I issued a written warning. See Case #25-08480 for further details.

As I was attempting to complete this traffic stop, I noticed several people from the inside upper bar area at Tequila’s, all of which appeared to be younger in age, looking outside at my marked patrol vehicle with its emergency red and blues on. As I was attempting to speak with the driver of the vehicle during my traffic stop, I heard a large commotion behind me. I turned around and noticed several, approximately 20 to 30, younger college-aged individuals leave the back door of the upper bar area. They jumped onto the outdoor patio that had been blocked off. They began running into and tripping on the stacked chairs, due to it being wintertime outside. This was also not a normal door that would be used during the wintertime. They then all began jumping the patio fence, screaming that the police were here. This was not a normal response, nor was I at the

bar for any reason other than being in their parking lot for the traffic stop. I informed other officers of the commotion and to come to my location for a possible bar check, due to this unnatural reaction from police presence.

After I was completed with the traffic stop and released the driver from the initial traffic stop, Officer Morris had already started a bar check reference this incident. Officer Beardmore waited near the patio area on the west side of the rear door to the upper bar area, while Officer Morris and I went inside. Officer Morris and I went to the upper bar area and noticed several individuals who appeared to be looking away from us, along with several individuals that ran to the bathroom areas near the rear patio doors. Several others also tried to go out of the exit doors, however, Officer Beardmore was there, who they noticed in full uniform, and came back into the bar and attempted to blend in at the bar.

When observing the crowd inside the upper bar area, they did have a bouncer stationed out in front of it. I recognized no one appeared to be over the age of 21 and looked to be significantly younger. Due to this, and there being so many, I called for additional officers and also La Crosse Police Command staff. Additional officers did arrive on scene, along with Sergeant Mandujano. I briefed all of them on my observations, along with Sergeant Mandujano, and advised we were going to ID everyone in the upper bar area due to the ages and reactions.

CONTACT WITH DEVON BOSTWICK:

As officers began making contact with people, I made contact with Devon Bostwick. Devon advised he did not have identification on him, nor any form of ID. Devon informed me he was underage and had been drinking alcohol. I could also smell the odor of alcohol emitting from his breath while he was speaking. His speech was slurred and his eyes were bloodshot and glossy.

I walked Devon outside to my marked patrol vehicle, parked in the front lot still. There, I verified his information he gave me verbally. I looked up his Wisconsin driver's license photo, which did match Devon Bostwick, who I had with me. When running his information through La Crosse County Dispatch Center, they advised he had two prior underage consumption citations already. Devon also informed me he was familiar with this process and understood he would be receiving a citation.

When asking Devon if he would provide a PBT sample, he refused and did not want to provide a PBT sample. Devon was issued a citation for possession/consumption of alcohol, municipal ordinance 4-9. He was explained the citation in full and released.

CONTACT WITH BRENDEN VAUGHAN:

Officer Abraham walked out to my patrol vehicle, where I was with Devon Bostwick and Brenden Vaughan, who was also inside the bar. Brenden was identified by Officer Abraham by his Wisconsin driver's license.

Due to the large amount of people inside and Officer Abraham trying to get back inside to assist officers, he was turned over to me for being in the bar underage and also admitting to consuming alcohol. Brenden submitted to a PBT and registered a .009 on the PBT.

When running Brenden's information through La Crosse County Dispatch Center, they advised this was his first offense UAL. Brenden was issued a citation for possession/consumption of alcohol underage, municipal ordinance 4-9. He was furnished with the citation and advised he had no further questions. He was released.

CONTACT WITH TROY DAVIS:

I also made contact with Troy Davis, who was also inside the bar. Troy immediately informed me he was underage and also consumed alcohol. Troy identified himself by his Minnesota driver's license.

Troy did walk outside with me, where he did submit to a PBT, which registered a .084 on the PBT. Troy was very cooperative throughout this process.

When running his information through La Crosse County Dispatch Center, they advised this was Troy's first offense UAL. Troy was issued and furnished with a copy of his citation for municipal ordinance 4-9. Troy advised he had no further questions and was released along with his friends to walk back to the dorms at UW-La Crosse.

CONTACT WITH MIGUEL GUERRERO:

Sergeant Mandujano made contact with Miguel Guerrero, one of the Managers on duty and advised he was the owner of the Tequila's. His information was also found in local RMS, also stating he was the owner of Tequila's.

Miguel was informed of the situation tonight and the issues that arose. He was informed almost everyone found in the upper bar area was underage. Sergeant Mandujano continued contact with him via phone, as he was not there on scene. See Sergeant Mandujano's report for further details.

Miguel was informed he was going to be receiving a citation for allowing underage persons in the bar. He advised he understood and it could be left at the bar for him. On 03/05/2025 at 3PM, I completed a citation for the business of Tequilas for allowing underage persons in the bar. It was left with La Crosse Police front end staff to be mailed.

I also left Miguel and staff at Tequila's my business card in case there were any further questions.

CONTACT WITH NOAH COLEMAN:

I made contact with the front bar bouncer, Noah Coleman. Noah was identified by a Wisconsin driver's license. Noah was very cooperative and advised he ID'd everyone that came into the bar area.

Several individuals, including the individual I spoke with, Troy, advised he had gotten up to the bar by jumping over the side patio and coming in through the side door that was opened for him by someone inside. Where Noah was positioned, he could only see anyone coming in from the front door or coming from the restaurant area. There were two doors behind him, one that went out the west side of the bar area and then also one that went out to the south side. From where Noah was, he could not see these exits unless he looked into the bar. Noah again clarified he identified everyone that came into the bar. I informed him how people were telling officers they were getting inside. I also informed him several individuals did not even have identification on them.

After speaking with La Crosse Police Command staff, it was determined a citation for Noah, being the single bouncer, would be appropriate in this incident for allowing underage persons in a bar. Noah was issued a citation for municipal ordinance 4-7. He was explained the citation and released without any further questions.

DISPOSITION:

Several other individuals ran out the back door when officers were just getting inside of the bar. I saw another approximately 20 to 30 people that ran out the back of the bar as well when I was making the traffic stop. I informed all the subjects I issued citations to that this unnatural reaction is what prompted this bar check. All advised they understood and also saw the numerous people run outside when I made the traffic stop outside of the bar.

In total, 18 underage consumption citations were written and also two allowing underage persons in a bar citations were written as well. No further immediate follow up is needed with this initial report.

End of dictation.

N 1406555

WISCONSIN UNIFORM MUNICIPAL COURT CITATION AND COMPLAINT

23-41284

*Deposit Permitted \$ 313.00

Cash Card

(For Court Use only)

You Are Notified To Appear

Is this a mandatory appearance? yes no

(Read the reverse side of this citation for court information.)

Date 9/27/23

Time 8:30 AM PM

400 La Crosse St Municipal Court

La Crosse WI 54601

Defendant Name - Last: Hernandez First: Yolanda MI

Street Address: [Redacted] Post Office: [Redacted] State: [Redacted] Zip Code: [Redacted]

Driver License Number or Other I.D. (specify): [Redacted] State: [Redacted] Exp. Yr.: [Redacted]

Date of Birth: [Redacted] Sex: F Race: H Height: [Redacted] Weight: [Redacted] Hair: [Redacted] Eyes: [Redacted]

License Plate Number: [Redacted] Plate Type: [Redacted] State: [Redacted] Exp. Yr.: [Redacted]

Plaintiff: City Village Town
OF: La Crosse

Defendant Violated: 4-b
Ordinance No. [Redacted]

Adopting State Statute No. [Redacted]

Description of Violation: Sale of alcohol to minor

Week Day: TH Month - Day - Year: 8/31/23 Time: 7:12 AM PM At: 515 West Ave County: [Redacted]

Name & Address of Parent/Guardian/Legal Custodian (if minor defendant)

Citation Served: Personally Mailed to defendant's last known address
 Left with person residing at defendant's residence: Name [Redacted] Age [Redacted]

Print Officer Name: Abraham Department: LCPD I.D. No.: 2656 Date Citation Issued: 8/31/23 Telephone Number of Parent/Guardian/Legal Custodian: [Redacted]

MC-2000, 10/01

COURT COPY

AGENCY RECORD

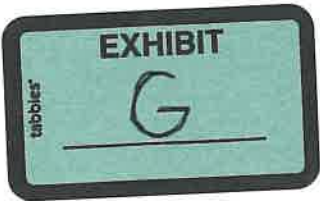
Date of Disposition: [Redacted] FINDING: Guilty Default Dismissed Forfeiture

PLEA: Guilty No Contest Not Guilty Not Guilty \$ [Redacted]

Other Designation: [Redacted]

Court Officer: [Redacted] Comments: [Redacted]

Incident Report: Bar check / compliance check at Tegulas. 2 underage purchased alcohol from defendant. Defendants were not asked to provide ID. Defendant stated she checked. purchase recorded on VC camera also other underage drinkers at bar. Cite / court explained. BWC on.



You are Notified to Appear

Appearance Required: **YES** Date **MAY-08-2024** Time **08:30 AM**

LA CROSSE CITY MUNICIPAL COURT
400 LA CROSSE ST
LA CROSSE, WI 54601 (608) 789-7290
CITYOFLACROSSE.ORG/MUNICIPALCOURT

Form No. and Version CT CITATION NO.
MUNI 0405 **0B8050LKFK**
Juvenile DEPOSIT Cash- Card
\$313.00 N N
Court Use: DA N

Defendant (Last Name, First, Middle), Street Address, P.O. Box, City, State, Zip
FLORES CRUZ, FRANKLIN O
[Redacted]

Birth Date Sex Race
[Redacted] M H
HT WT Hair Eyes
[Redacted]

Driver License/Identification Card Number State Exp. Yr.
[Redacted]
Other Identification Number ID Type
License Plate Number Plate Type State Exp. Yr.
Vehicle Identification Number Telephone Number
[Redacted]

Name and Address of Parent/Guardian/Legal Custodian (If minor defendant)

Telephone Number of Parent/Guardian/Legal Custodian

Plaintiff
CITY OF LA CROSSE
Violation Description

Ordinance Violated
4-6

Adopting State Statute
[Redacted]

Ordinance Description
SALE/FURNISH LIQUOR TO UNDERAGE
Week Day Date Time
FRIDAY 04/05/2024 **03:56 PM**
From/AT Hwy No. and/or Street Name
515 WEST AVE N/035
County City/Village/Town
LA CROSSE - 32 **LA CROSSE - 54, CITY**

Agency Space
10-24-14531

Officer Name
OFFICER DEUNDRAE JACKSON
Officer ID Department
2225 **LA CROSSE POLICE DEPARTMENT**

Date Citation Served, Method
04/05/2024 **IN PERSON**
Residence Contact Name Age
(If left with person at defendant's address)

Victim Birth Date Restitution Requested

INSTRUCTIONS - READ CAREFULLY

Police # **10-24-14531**
SQUAD 22, MV NO, BWC ON. SERGEANT ROSSMAN, FTO RINGFLEISCH, AND MYSELF CONDUCTED A BAR CHECK AT TEQUILA MEXICAN RESTAURANT. WHILE CONDUCTING A WALK THROUGH OF THE RESTAURANT WE OBSERVED A TABLE WITH THREE INDIVIDUALS ALL WITH ALCOHOLIC DRINKS IN FRONT OF THEM. ALL THREE SUBJECTS APPEARED TO BE 18-20 YEARS OLD. AFTER ASKING THEIR AGE THEY ADMITTED TO BEING 18, 19, AND 20 YEARS OLD. THEY STATED THE WAITER DIDN'T CARD THEM AT ALL. SPEAKING WITH FRANKLIN WHO PROVIDED THEIR SERVICE STATED HE ASKED FOR IDENTIFICATION, AND THEY ALL INDICATED THEY LEFT IT IN THE CAR, BUT HE SHOULD TRUST THEM THAT THEY ALL 21 YEARS OLD. FRANKLIN ADVISED HE TOOK THEIR WORD AND SERVED THEM DRINKS. I ISSUED AND EXPLAINED A CITATION FOR SALE/FURNISH LIQUOR TO UNDERAGE.

WISCONSIN NON TRAFFIC CITATION

Citation #
0B8050LKFK

You are Notified to Appear

Appearance Required: **YES** Date: **APR-02-2025** Time: **08:30 AM**

LA CROSSE CITY MUNICIPAL COURT
400 LA CROSSE ST
LA CROSSE, WI 54601 (608) 789-7290
CITYOFLACROSSE.ORG/MUNICIPALCOURT

Form No. and Version CT CITATION NO.
MUNI 0405 **OB80BML3Z**
Juvenile DEPOSIT Cash- Card
\$376.00 N N
Court Use: DA N

Defendant (Last Name, First, Middle), Street Address, P.O. Box, City, State, Zip
COLEMAN, NOAH M
[Redacted]

Birth Date Sex Race
[Redacted] 2006 M W
HT WT Hair Eyes
[Redacted] [Redacted] [Redacted] [Redacted]

Driver License/Identification Card Number State Exp. Yr.
[Redacted] [Redacted] [Redacted]
Other Identification Number ID Type
License Plate Number Plate Type State Exp. Yr.
Vehicle Identification Number Telephone Number

Name and Address of Parent/Guardian/Legal Custodian
(If minor defendant)

Telephone Number of Parent/Guardian/Legal Custodian

Plaintiff
CITY OF LA CROSSE
Violation Description

Ordinance Violated
4-7

Adopting State Statute
[Redacted]

Agency Space
10-25-08482

Ordinance Description
ALLOW UNDERAGE IN BAR
Week Day Date Time
SATURDAY 03/01/2025 10:46 PM
From/AT Hwy No. and/or Street Name
ON WEST AVE N/35 NORTH 94 FT N OF BADGER ST
County City/Village/Town
LA CROSSE - 32 LA CROSSE - 54, CITY

Officer Name
OFFICER DAKOTA JELINSKI

Date Citation Served, Method
03/01/2025 IN PERSON

Officer ID Department
2543 LA CROSSE POLICE DEPARTMENT

Residence Contact Name Age

Victim

(If left with person at defendant's address)

Birth Date Restitution Requested

INSTRUCTIONS - READ CAREFULLY

Police # **10-25-08482**
SQ 35. BWC WORKING . CITED AND RELEASED
SEE THE WRITTEN REPORT FOR FURTHER DETAILS.

WISCONSIN NON TRAFFIC CITATION

You are Notified to Appear

Appearance Required: **YES**

Date

OCT-15-2025

Time

08:30 AM

Form No. and Version CT

MUNI 0405

CITATION NO.

0B810655QG

**LA CROSSE CITY MUNICIPAL COURT
400 LA CROSSE ST
LA CROSSE, WI 54601 (608) 789-7290
CITYOFLACROSSE.ORG/MUNICIPALCOURT**

Juvenile DEPOSIT Cash- Card
\$376.00 N N

Court Use: DA **N**

Defendant (Last Name, First, Middle), Street Address, P.O. Box, City, State, Zip

MEMORY, MATTHEW J

Birth Date

2005

Sex

M

Race

HT

WT

Hair

Eyes

Driver License/Identification Card Number

State

Exp. Yr.

Other Identification Number

ID Type

License Plate Number

Plate Type

State

Exp. Yr.

Vehicle Identification Number

Telephone Number

Name and Address of Parent/Guardian/Legal Custodian
(If minor defendant)

Telephone Number of Parent/Guardian/Legal Custodian

Plaintiff

CITY OF LA CROSSE

Violation Description

Ordinance Violated

4-7

Adopting State Statute

Agency Space

10-25-39601

Ordinance Description

ALLOW UNDERAGE IN BAR

Week Day

Date

Time

THURSDAY 09/04/2025

07:46 PM

From/AT Hwy No. and/or Street Name

ON 12TH ST 152 FT S OF LA CROSSE ST/016

County

City/Village/Town

LA CROSSE - 32

LA CROSSE - 54, CITY

Officer Name

OFFICER MICHAEL ABRAHAM

Date Citation Served,

09/04/2025

Method

IN PERSON

Residence Contact Name

Age

Officer ID

Department

2656

LA CROSSE POLICE DEPARTMENT

(If left with person at defendant's address)

Victim

Birth Date

Restitution Requested

INSTRUCTIONS - READ CAREFULLY

Police # **10-25-39601**

CONDUCTING UNDERAGE COMPLIANCE CHECKS WITH MINOR (20 YO) VOLUNTEERS. MINORS ENTERED TEQUILAS BAR. BOUNCER AT BAR ENTRANCE. BOUNCER CHECKED MINORS ID. ALLOWED THEM IN BAR EVEN THOUGH THEY WERE UNDER 21. THEY WERE THEN SERVED BY BAR TENDER

DEFENDANT STATED HE CHECKED IDS. STATED HE THOUGHT THEY SAID 2003 AND WERE 21

EXPLAINED CITE AND COURT

WI PHOTO ID

WISCONSIN NON TRAFFIC CITATION

1 of 2

Citation #

0B810655QG

265 BWC ON

WISCONSIN NON TRAFFIC CITATION
2 of 2

Citation #
0B810655QG

You are Notified to Appear

Appearance Required: **YES** Date **OCT-08-2025** Time **08:30 AM**

LA CROSSE CITY MUNICIPAL COURT
400 LA CROSSE ST
LA CROSSE, WI 54601 (608) 789-7290
CITYOFLACROSSE.ORG/MUNICIPALCOURT

Form No. and Version CT CITATION NO.
MUNI 0405 0B81DH9857
Juvenile DEPOSIT Cash- Card
\$376.00 N N
Court Use: DA **N**

Defendant (Last Name, First, Middle), Street Address, P.O. Box, City, State, Zip

GUERRERO CHAVOLLA, LUIS A

515 WEST AVENUE N
LA CROSSE WI 54601

Birth Date Sex Race
[REDACTED] **M** **H**
HT WT Hair Eyes
[REDACTED] [REDACTED] [REDACTED] [REDACTED]

Driver License/Identification Card Number State Exp. Yr.
[REDACTED] [REDACTED] [REDACTED]

Other Identification Number ID Type

License Plate Number Plate Type State Exp. Yr.

Vehicle Identification Number Telephone Number

Name and Address of Parent/Guardian/Legal Custodian
(If minor defendant)

Telephone Number of Parent/Guardian/Legal Custodian

Plaintiff

CITY OF LA CROSSE

Violation Description

Ordinance Violated

4-7

Adopting State Statute

Agency Space

10-25-39979

**CITY OF LA CROSSE POLICE
DEPARTMENT**

Ordinance Description

ALLOW UNDERAGE IN BAR

Week Day Date Time
SATURDAY 09/06/2025 09:56 PM

From/AT Hwy No. and/or Street Name

515 035

County City/Village/Town
LA CROSSE - 32 LA CROSSE - 54, CITY

Officer Name
OFFICER ALEXANDRA BEARDMORE

Date Citation Served, Method
09/08/2025 IN PERSON

Officer ID Department
2801 LA CROSSE POLICE DEPARTMENT

Residence Contact Name Age

(If left with person at defendant's address)

Victim Birth Date Restitution Requested

INSTRUCTIONS - READ CAREFULLY

Police # **10-25-39979**

SQUAD #16 / MV WORKING / BWC ACTIVE / SUBJECT IDENTIFIED VERBALLY / ON LISTED DATE OFFICER ABRAHAM, OFFICER WATKINS, AND I PERFORMED A BAR CHECK AT LISTED LOCATION. UPON ENTERING THE BAR, SEVERAL SUBJECTS BEGAN ACTING UNCOMFORTABLE AND AS IF THEY WANTED TO LEAVE FOR UNDERAGE REASONS. I MADE CONTACT WITH A TABLE OF FOUR UNDERAGE SUBJECTS. OFFICERS ABRAHAM AND WATKINS MADE CONTACT WITH FOUR OTHER UNDERAGE SUBJECTS. THE OTHER SUBJECTS IN THE BAR WERE UNABLE TO BE SPOKEN TOO PRIOR TO LEAVING. UPON QUESTIONING THE FOUR SUBJECTS I ISSUED CITATIONS TO, THEY STATED THEY WALKED INTO THE BAR, WERE NOT CARDED, AND WERE SERVED ALCOHOL. THERE WERE A TOTAL OF SIXTEEN UNDERAGE RELATED CITATIONS ISSUED TO EIGHT UNDERAGE SUBJECTS DURING THIS BAR CHECK.

THE CITY OF LA CROSSE POLICE DEPARTMENT HAS PREVIOUSLY HAD PROBLEMS WITH THE LISTED LOCATION SERVING UNDERAGE SUBJECTS. I HAVE PERSONALLY EXPERIENCED THIS ON 3/1/2025 REFERENCE 10-25-08482. THE AGENT WAS CITED

WISCONSIN NON TRAFFIC CITATION

Citation #
0B81DH9857

DURING THIS CALL FOR SERVICE. DUE TO THE NUMBER OF UNDERAGE SUBJECTS INSIDE OF THE BAR, AND INFORMATION PROVIDED TO LE STATING THEY WERE NOT CARDED, I MADE PHONE CONTACT WITH THE AGENT ON MY NEXT WORKING SHIFT (09/08/2025 REFERENCE 25-40244).

THE AGENT WISHED TO SPEAK IN PERSON. I MET THE LISTED SUBJECT (AGENT OF THE BAR) AND EXPLAINED HE WOULD BE CITED AS THE AGENT FOR THIS INCIDENT. THE AGENT STATED THE PROBLEMS AT THE BAR WERE NOT HIS FAULT, AND ITS LIKELY THE UNDERAGE SUBJECTS ARE PROVIDING FALSE ID'S. LISTED SUBJECT STATED IT COULD BE BOUNCER, BUT HAS TALKED TO ALL THE STAFF AT LOCATION REGARDING THE ISSUES EVER SINCE PREVIOUS INCIDENT. I PROVIDED AGENT WITH CITATION. NO FURTHER ACTION TAKEN.

WISCONSIN NON TRAFFIC CITATION

2 of 2

Citation #

0B81DH9857

You are Notified to Appear

Appearance Required:

YES

Date

OCT-22-2025

Time

08:30 AM

Form No. and Version CT

MUNI 0405

CITATION NO.

0B80SR69GQ

LA CROSSE CITY MUNICIPAL COURT
400 LA CROSSE ST
LA CROSSE, WI 54601 (608) 789-7290
CITYOFLACROSSE.ORG/MUNICIPALCOURT

Juvenile DEPOSIT Cash- Card
\$376.00 N N

Court Use: DA

Defendant (Last Name, First, Middle), Street Address, P.O. Box, City, State, Zip

GUERRERO CHAVOLLA, LUIS A

Birth Date

Sex

Race

[REDACTED]

M

H

HT

WT

Hair

Eyes

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Driver License/Identification Card Number

[REDACTED]

State

[REDACTED]

Exp. Yr.

[REDACTED]

Other Identification Number

ID Type

License Plate Number

Plate Type

State

Exp. Yr.

Vehicle Identification Number

Telephone Number

[REDACTED]

Name and Address of Parent/Guardian/Legal Custodian
(If minor defendant)

Telephone Number of Parent/Guardian/Legal Custodian

Plaintiff

CITY OF LA CROSSE

Violation Description

Ordinance Violated

4-7

Adopting State Statute

Agency Space

10-25-42200

Ordinance Description

ALLOW UNDERAGE IN BAR

Week Day

Date

Time

FRIDAY 09/19/2025

09:43 PM

From/AT Hwy No. and/or Street Name

ON 12TH ST 172 FT S OF LA CROSSE ST/016

County

City/Village/Town

LA CROSSE - 32

LA CROSSE - 54, CITY

Officer Name

OFFICER ANDREW JARRETT

Date Citation Served,

09/19/2025

Method

IN PERSON

Residence Contact Name

LUIS

Age

(If left with person at defendant's address)

[REDACTED]

Victim

Birth Date

Restitution Requested

INSTRUCTIONS - READ CAREFULLY

Police # **10-25-42200**

SQUAD 2 MOBILE VIDEO/BODY WORN CAMERA ON AND WORKING. ON THE ABOVE LISTED DATE AND TIME, OFFICERS CONDUCTED A BAR CHECK AT TEQUILAS. IMMEDIATELY UPON ENTERING THE BAR AND WALKING PAST THE BOUNCER, OFFICERS CONTACTED 3 FEMALES AND ASKED FOR THEIR IDENTIFICATION. EACH OF THE THREE FEMALES WERE UNDERAGE COLLEGE STUDENTS IN POSSESSION OF FAKE IDENTIFICATION CARDS. ALL THREE INDIVIDUALS INDICATED THEY UTILIZED THE FAKE IDENTIFICATION CARDS TO GET ENTRY INTO THE BAR. PLEASE REFERENCE THE THREE ATTACHED CITATIONS ASSOCIATED WITH THIS CASE FOR ADDITIONAL INFORMATION. I CONTACTED THE LISTED INDIVIDUAL, WHO VERIFIED HE IS THE OWNER OF THE BAR. I VERIFIED THE LISTED INDIVIDUAL WAS THE PERSON LISTED ON THE ESTABLISHMENT'S LIQUOR LICENSE. IDENTIFIED VERBALLY. CITED FOR ALLOWING UNDERAGE PERSONS IN A BAR AND RELEASED.

WISCONSIN NON TRAFFIC CITATION

1 of 1

Citation #

0B80SR69GQ

You are Notified to Appear

Appearance Required: **YES** Date **APR-01-2026** Time **08:30 AM**

LA CROSSE CITY MUNICIPAL COURT
400 LA CROSSE ST
LA CROSSE, WI 54601 (608) 789-7290
CITYOFLACROSSE.ORG/MUNICIPALCOURT

Form No. and Version CT CITATION NO.
MUNI 0405 0B80SR69HP
Juvenile DEPOSIT Cash- Card
\$313.00 N N
Court Use: DA N

Defendant (Last Name, First, Middle), Street Address, P.O. Box, City, State, Zip
HERNANDEZ ARAUZ, YOLANDA M

Birth Date Sex Race
[REDACTED] F H
HT WT Hair Eyes
[REDACTED] [REDACTED] [REDACTED] [REDACTED]

Driver License/Identification Card Number State Exp. Yr.
[REDACTED] [REDACTED] [REDACTED]
Other Identification Number ID Type
[REDACTED] [REDACTED]
License Plate Number Plate Type State Exp. Yr.
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Vehicle Identification Number Telephone Number
[REDACTED] [REDACTED]

Name and Address of Parent/Guardian/Legal Custodian
(If minor defendant)

Telephone Number of Parent/Guardian/Legal Custodian

Plaintiff
CITY OF LA CROSSE

Ordinance Violated
4-6

Adopting State Statute
[REDACTED]

Violation Description

Agency Space
10-26-08242

Ordinance Description

SALE/FURNISH MALT BEV TO UNDERAGE

Week Day Date Time
WEDNESDAY 02/25/2026 06:29 PM
From/AT Hwy No. and/or Street Name
515 035
County City/Village/Town
LA CROSSE - 32 LA CROSSE - 54, CITY

Officer Name
OFFICER DAKOTA JELINSKI

Date Citation Served, Method
02/25/2026 IN PERSON

Officer ID Department
2543 LA CROSSE POLICE DEPARTMENT

Residence Contact Name Age
YOLANDA HERNANDEZ ARAUZ [REDACTED]
(If left with person at defendant's address)

Victim

Birth Date Restitution Requested

INSTRUCTIONS - READ CAREFULLY

Police # **10-26-08242**

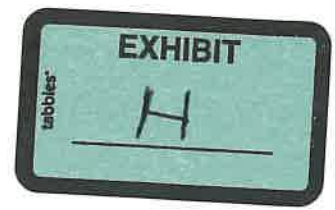
NRO SQUAD 02, BWC ACTIVE. ON 2/25/2026 AT APPROXIMATELY 1829 HOURS, I, OFC. JELINSKI AND OFC. E. ARMOUR WERE DOING ALCOHOL COMPLIANCE CHECKS. COLTON WHARTON AND ABYGALE DUPONT ENTERED THE RESTAURANT AND WENT TO THE BAR, WHERE A FEMALE IDENTIFIED VERBALLY AS YOLANDA HERNANDEZ ARAUZ CHECKED THEIR LEGITIMATE WI AND MN ISSUED DRIVER'S LICENSE. COLTON IS 20 YO AND ABYGALE IS 19 YO. AFTER CHECKING THEIR ID'S, YOLANDA ACCEPTED \$20 IN PAYMENT FOR A MILLER LITE TAP AND CARBLISS, BOTH ALCOHOLIC BEVERAGES. THESE BEVERAGES WERE SERVED TO COLTON AND ABYGALE AND CHANGE WAS GIVEN TO THEM. YOLANDA WAS CITED FOR FURNISHING MALT BEVERAGE TO AN UNDERAGE PERSON.

WISCONSIN NON TRAFFIC CITATION

Citation #
0B80SR69HP



LA CROSSE
POLICE DEPARTMENT
LEAD. PARTNER. PROTECT.



MEMORANDUM

DATE: June 5, 2026
TO: Judicial and Administration Committee
FROM: Sergeant D. Mandujano *D. Mandujano*
SUBJECT: Chabolla Corp. dba Tequilas Mexican Restaurant 515 West Ave. N.
COPIES TO: Chief Shawn Kudron

Tequila Mexican Restaurant, operated by Chabolla Corp. and located at 515 West Ave. N., holds a combination "Class B" beer and liquor license within the City of La Crosse. Over the past several years, the establishment has demonstrated a continued pattern of underage alcohol violations, noncompliance with nuisance abatement requirements, and disregard for corrective actions taken by the City of La Crosse and the La Crosse Police Department.

Repeated Alcohol Violations During Current License Year

During the current license year of July 1, 2025 through June 30, 2026, the establishment and its employees were convicted of three separate alcohol-related violations involving either allowing underage individuals within the premises or furnishing alcohol to underage persons. On September 4, 2025, a municipal ordinance citation was issued for Ord. 4-7 – Allow Underage in Bar. Municipal Court records indicate the citation resulted in a conviction on October 15, 2025. The citation was issued to Matthew J. Memory (bouncer), Tequila Mexican Restaurant, 515 West Ave. N.

On September 6, 2025, a municipal ordinance citation was issued for Ord. 4-7 – Allow Underage in Bar. La Crosse County Circuit Court records indicate the citation resulted in a conviction on April 14, 2026. The citation was issued to Luis Guerrero Chavolla (agent), Tequila Mexican Restaurant, 515 West Ave. N.

On February 25, 2026, a municipal ordinance citation was issued for Ord. 4-6 – Sale/Furnish Liquor to Underage. Municipal Court records indicate the citation resulted in a conviction on April 1, 2026. The citation was issued to Yolanda M. Hernandez Arquez (beverage server), Tequila Mexican Restaurant, 515 West Ave. N.

Despite prior enforcement actions, alcohol compliance training, and ongoing communication with law enforcement, violations involving underage alcohol activity have continued.

Violation of Chronic Nuisance Premises Abatement Plan

On September 30, 2025, representatives of the La Crosse Police Department and Chabolla Corp., including Miguel Guerrero (owner) and Luis Guerrero Chavolla (agent), entered into a Chronic Nuisance Abatement Plan Agreement.

Among other requirements, the agreement required the submission of monthly written reports to the Police Department detailing nuisance abatement efforts and compliance measures undertaken by the establishment. To date, only two reports have been submitted.

Additionally, three abatement logs were turned in to the La Crosse Police Department on May 20, 2026. Review of those logs revealed multiple incidents where suspected underage activity occurred and law enforcement was not contacted, contrary to the reporting requirements outlined in the agreement.

As part of the nuisance abatement process, the City and Police Department provided multiple opportunities for corrective action and compliance assistance, including alcohol compliance and beverage server training sessions conducted on July 17, 2024 and March 11, 2025. Despite these efforts, violations and underage activity have continued.

Fire Code Violations and Safety Concerns

On December 4, 2025, the La Crosse Fire Department conducted an inspection of the establishment and documented significant electrical code violations and safety concerns. These issues were communicated directly to Luis Guerrero Chavolla, who was present during the inspection.

A follow-up inspection occurred on May 5, 2026. During the re-inspection, Fire Department personnel observed that none of the previously identified electrical issues had been corrected. The unresolved code violations were again communicated to Luis Guerrero Chavolla.

Prior Non-Renewal Proceedings and Previous Violations

During the license year of July 1, 2023 through June 30, 2024, the City of La Crosse issued Chabolla Corp. a Notice of Intent to Not Renew License based upon repeated violations involving sales of alcohol to underage individuals.

The following violations occurred during that license period:

- August 31, 2023 – Conviction for Ord. 4-6 – Sale/Furnish Liquor to Underage issued to Yolanda Hernandez (beverage server).
- February 1, 2024 – Conviction for Ord. 4-6 – Sale/Furnish Liquor to Underage issued to Yolanda Hernandez (beverage server).
- April 5, 2024 – Conviction for Ord. 4-6 – Sale/Furnish Liquor to Underage issued to Franklin Flores Cruz (beverage server).

On June 4, 2024, the City of La Crosse and Chabolla Corp. entered into an agreement resolving the pending non-renewal proceedings. Pursuant to that agreement, Chabolla Corp. accepted a ten-day suspension and acknowledged violations of Municipal Code Section 4-6 on three separate occasions during the 2023–2024 license year.

Despite being given multiple opportunities to improve compliance, similar violations have continued during the current license year.

Ongoing and Significant Underage Activity

The establishment has demonstrated a prolonged pattern of underage-related activity over the past four years. Since May 2022, officers have responded to approximately 78 calls for service involving bar checks or party-related complaints at the establishment.

During those incidents, officers issued approximately 74 citations on twelve different occasions involving violations such as:

- Allow Underage in Bar
- Underage Possession/Consumption
- Underage in Bar
- Possession of False Identification

Examples of these incidents include:

- September 19, 2025 – Officers issued five underage-related citations and one citation for Allowing Underage in Bar.
- September 6, 2025 – Officers issued seventeen underage-related citations.
- March 1, 2025 – Officers issued twenty-one underage-related citations and one citation for Allowing Underage in Bar.
- September 19, 2024 – Officers issued four underage-related citations.
- April 5, 2024 – Officers issued four underage consumption citations and one citation for false identification.
- February 1, 2024 – Officer issued one citation for selling alcohol to a minor.
- August 31, 2023 – Officers issued two underage consumption citations.
- September 10, 2022 – Officers issued six underage-related citations.
- May 16, 2022 – Officers issued one citation for sale to minor.
- April 21, 2022 – Officers issued four underage-related citations.

During this time, the City of La Crosse obtained an affidavit from an underage individual explaining how Tequilas has a reputation for being a bar that allows underage individuals in without much issue.

Comparatively, Bierhaus is an establishment that City of La Crosse Police has done the most bar checks with 220 done since 2021. During that time, citations have been written at 40 of those checks for a failure rate of approximately 18%. In comparison, Tequilas has had 31 bar checks in that same time span, with citations being written 15 times for a failure rate of approximately 48%.

Repeated Employee Violations Despite Training

Despite receiving TIPS alcohol compliance training provided by the La Crosse Police Department, employee Yolanda Hernandez continued to commit violations related to underage alcohol enforcement.

Over a three-year period, Hernandez was cited on three separate occasions for either selling alcohol to underage individuals or allowing underage individuals within the establishment. The incidents are as follows:

- August 31, 2023 – Conviction for Ord. 4-6 – Sale/Furnish Liquor to Underage.
- February 1, 2024 – Conviction for Ord. 4-6 – Sale/Furnish Liquor to Underage.
- February 25, 2026 – Conviction for Ord. 4-6 – Sale/Furnish Liquor to Underage.

Additionally, employee Matthew Memory was cited on two separate occasions within approximately two weeks for violations involving underage individuals inside the establishment.

The incidents are as follows:

- Oct. 15, 2025 – LCPD Case No. 25-39601 – Conviction for Ord. 4-7 – Allow Underage in Bar.
- September 19, 2025 – LCPD Case No. 25-42200 – Officers issued multiple underage-related citations and a citation for Allow Underage in Bar involving several underage individuals within the establishment.

These repeated violations occurred despite prior enforcement action, staff training, and opportunities for corrective action.

Conclusion

Based upon my training, experience, and review of enforcement activity involving the establishment, Tequila Mexican Restaurant has demonstrated an ongoing inability or unwillingness to comply with municipal alcohol regulations and nuisance abatement requirements.

Despite repeated enforcement action, formal agreements, staff training, and opportunities for corrective action, underage alcohol activity and related violations have continued. The continued operation of the establishment under its current practices presents an ongoing concern for public safety, contributes to underage alcohol consumption within the community, and places a disproportionate demand on law enforcement resources.



City of La Crosse, Wisconsin

City Hall
400 La Crosse Street
La Crosse, WI 54601

Text File

File Number: 26-0594

Agenda Date: 6/5/2026

Version: 1

Status: New Business

In Control: Judiciary & Administration Committee

File Type: Application

Agenda Number:

NOTICE OF INTENT NOT TO RENEW LICENSE

Inderyas Chiraghdin (Member and Agent), Mema Enterprises LLC dba Citgo on State, 1914 State Road, La Crosse, Wisconsin.

Basis for Intent to Not Renew

This is to notify you that the City of La Crosse intends to not renew the "Class A" Liquor; Class "A" Beer; and Cigarette, Tobacco and Electronic Vaping Device licenses issued to Mema Enterprises LLC for license year July 1, 2026 through June 30, 2027.

Pursuant to Wis. Stat. § 125.12(3), a municipality may refuse to renew an alcohol license for certain violations identified in § 125.12(2)(ag), including violations of municipal code or municipal regulations, such as when a person does not possess the qualifications required to hold a license, and for maintaining a disorderly house.

Pursuant to Wis. Stat. § 134.65(8) a municipality may refuse to renew a cigarette, tobacco and electronic vaping device license for certain violations identified in § 134.65(7), including violations of municipal code or municipal regulations, such as when a person does not possess the qualifications required to hold a license, when a person has knowingly permitted criminal behavior to occur on the licensed premises, and for maintaining a disorderly house.

The City of La Crosse alleges that the use of the establishment is interfering with public health and safety and is grounds for non-renewal of its "Class A" Liquor license; Class "A" Beer license; and Cigarette, Tobacco and Electronic Vaping Device license under Wis. Stat. §§ 125.12(2)(ag) and 134.65(7) for violations of municipal code or municipal regulations and for maintaining a disorderly house. This is supported by the following:

- (1) Lack of Qualifications. Mema Enterprises LLC Member and its Agent, Inderyas Chiraghdin, do not possess the qualifications to hold a license due to a pending criminal charge that substantially relates to the licensed activity. The matter is currently pending in La Crosse County Circuit Court and involves a Class H felony charge related to the possession of prescription medication.
- (2) Enforcement Actions. There have been multiple La Crosse Police Department incidents of disorderly, riotous, indecent, or improper use of the premises, including:
 - September 4, 2025, La Crosse Police Department Case No. 10-25-39593: The La Crosse Police Department conducted a compliance check which resulted in an officer issuing a Section 4-6 citation to employee Muhammad Tariq for selling alcohol to an underage individual. Per Municipal Court records, this citation resulted in a conviction on October 10, 2025.

This incident also implicates Municipal Code Section 10-171(k): "*Violations by agent or employee of licensee*. A violation of this article by a duly authorized agent or employee of the licensee shall constitute a violation of the licensee. Violations of the provisions of this article or the provisions of Wis. Stat. § 134.65 may be grounds for immediate revocation by the Common Council."

- November 17, 2025, La Crosse Police Department Case No. 10-25-51921: The La Crosse Police Department conducted a compliance check with the Department of Revenue and discovered various concerning items related to the consumption of illegal substances. A box containing 175 Malegra (sildenafil) 200mg tablets was discovered underneath the counter. These tablets are commonly known as Viagra and only available by prescription in the United States. The cashier informed officers that they sell them for \$7 each to anyone who asks. Officers told staff it was illegal to sell the pills and seized them. In addition, officers discovered that the establishment's invoices for their alcohol purchases were not organized and dated as required by the State.
- February 4, 2026, La Crosse Police Department Case No. 10-26-04730: The La Crosse Police Department conducted a compliance check with the Department of Revenue and again discovered sildenafil (generic Viagra) 200mg tablets behind the counter. This was the second time the La Crosse Police Department located these illegal pills at the establishment. Officers also located portions of the original packaging which visibly stated, "available by prescription only." When officers spoke with Inderyas Chiraghdin and asked about the pills, he said, "they are for sex." Inderyas Chiraghdin was arrested and released on a signature bond for delivery of prescription medication.

The La Crosse Police Department also discovered that the pills are not available commercially in the United States. In addition, the 200mg dosage of the pills exceeds the dosage available for prescription in the United States.

In addition, multiple violations related to tobacco and vaping products were identified. The Department of Revenue confiscated several illegal vaping products. Further, the establishment also did not have signage for their hemp-derived cannabinoid inventory. Mema Enterprises LLC was cited for Failure to Post Signage – Hemp-Derived Cannabinoids in violation of Municipal Code Section 32-165. Per Municipal Court records, this citation resulted in a conviction on February 26, 2026.

- (3) Application. Regarding applications for intoxicating liquor and fermented malt beverage licenses, Municipal Code Sections 4-72(b)(6) and 4-142(b)(6) state, "Any false statement contained in such application shall automatically nullify any license issued pursuant thereto." The 2026 renewal applications submitted by Mema Enterprises LLC do not disclose the Sec. 32-165 conviction against the establishment.

The 2026 renewal applications acknowledge a pending charge which is accompanied by the following statement: "A vendor sold me an erectile product which, unknown to me, might or might not contain a prescription medication for erectile dysfunction. TBD." This directly contradicts what Inderyas Chiraghdin told officers during the February 4, 2026 compliance check and mischaracterizes the pending felony.

Your Rights as License Holder

You have the right to a hearing to contest the nonrenewal of your license. Additionally, you have the right to be represented by an attorney at your own expense, the right to present evidence and testimony, and to cross-examine any witnesses produced by the City.

A nonrenewal hearing will be scheduled for **Friday, June 5, 2026, at 11:00 a.m.** in the Council Chambers of La Crosse City Hall, 400 La Crosse Street, La Crosse, Wisconsin.

Dated: May 15, 2026.

City of La Crosse

A handwritten signature in black ink, appearing to read "Mackenzie Mindel". The signature is written in a cursive style with a large initial "M".

Mackenzie Mindel
Judiciary & Administration Chair

CC: Nikki Elsen, City Clerk
Stephen F. Matty, City Attorney

Form
AB-200

Alcohol Beverage License Application

For Municipal Use Only
Municipality
License Period

Application Type (check one)

Initial (New) Renewal

License(s) Requested: (up to two boxes may be checked)	Fees								
<input checked="" type="checkbox"/> Class "A" Beer \$ <u>120</u> <input type="checkbox"/> Class "B" Beer \$ _____ <input checked="" type="checkbox"/> "Class A" Liquor \$ <u>520</u> <input type="checkbox"/> Regular "Class B" Liquor \$ _____ <input type="checkbox"/> "Class A" Liquor (cider only) \$ _____ <input type="checkbox"/> Reserve "Class B" Liquor \$ _____ <input type="checkbox"/> "Class C" Liquor (wine only) \$ _____ <input type="checkbox"/> Above-Quota "Class B" Liquor \$ _____	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="font-size: x-small;">License Fee(s)</td> <td style="text-align: right;">\$ <u>640</u></td> </tr> <tr> <td style="font-size: x-small;">Background Check Fee</td> <td style="text-align: right;">\$ _____</td> </tr> <tr> <td style="font-size: x-small;">Publication Fee</td> <td style="text-align: right;">\$ _____</td> </tr> <tr> <td style="font-size: x-small;">Total Fees</td> <td style="text-align: right;">\$ <u>640</u></td> </tr> </table>	License Fee(s)	\$ <u>640</u>	Background Check Fee	\$ _____	Publication Fee	\$ _____	Total Fees	\$ <u>640</u>
License Fee(s)	\$ <u>640</u>								
Background Check Fee	\$ _____								
Publication Fee	\$ _____								
Total Fees	\$ <u>640</u>								

Part A: Premises/Business Information

1. Legal Business Name (individual name if sole proprietorship) <u>Mema Enterprises LLC</u>			
2. Business Trade Name or DBA <u>Citgo on State</u>			
3. FEIN <u>99-2193995</u>		4. Wisconsin Seller's Permit Number <u>456-1031704198-04</u>	
5. Entity Type (check one) <input type="checkbox"/> Sole Proprietor <input type="checkbox"/> Partnership <input checked="" type="checkbox"/> Limited Liability Company <input type="checkbox"/> Corporation <input type="checkbox"/> Nonprofit Organization			
6. If the applicant business is an LLC, are the controlling members other LLCs or corporations? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, the members, managers, officers and directors of those business entities must be listed in Part C and provide a Form AB-100.			
7. State of Organization <u>Wisconsin</u>	8. Date of Organization <u>3/19/2024</u>	9. Wisconsin DFI Registration Number <u>M131386</u>	
10. Premises Address <u>1914 State Rd</u>			
11. City <u>La Crosse</u>	12. State <u>WI</u>	13. Zip Code <u>54601</u>	
14. County <u>La Crosse</u>	15. Governing Municipality: <input checked="" type="checkbox"/> City <input type="checkbox"/> Town <input type="checkbox"/> Village of: <u>La Crosse</u>		16. Aldermanic District
17. Premises Phone <u>608-785-1913</u>	19. Website <u>None</u>		
20. Premises Description Initial (New Applicants Only): Describe the building or buildings where alcohol beverages are produced, sold, stored, or consumed, and related records are kept. Describe all rooms within the building, including living quarters. Authorized alcohol beverage activities and storage of records may occur only on the premises described in this application. Attach a map or diagram and additional sheets if necessary. Renewal Applicants Only: I am renewing a license and by checking the box following this statement, I affirm that I have reviewed the last issued license certificate and the premises description remains the same. <input checked="" type="checkbox"/>			
21. Mailing Address (if different from premises address)			
22. City		23. State	24. Zip Code

Part B: Questions

1. Has the business (sole proprietorship, partnership, limited liability company, or corporation) been convicted of violating federal or state laws or local ordinances? Exclude traffic offenses unless related to alcohol beverages. Yes No
 If yes, list the details of violation below. Attach additional sheets if necessary.

Law/Ordinance Violated	Location	Trial Date
Penalty Imposed	Was sentence completed? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Law/Ordinance Violated	Location	Trial Date
Penalty Imposed	Was sentence completed? <input type="checkbox"/> Yes <input type="checkbox"/> No	

2. Are charges for any offenses pending against the business? Exclude traffic offenses unless related to alcohol beverages. Yes No

If yes, describe the nature and status of pending charges using the space below. Attach additional sheets as needed.
A vendor sold me an erectile product which, unknown to me, might or might not contain a prescription medication for erectile dysfunction. TBD

3. Is the applicant business or any of its officers, directors, members, agent, employees, owners, or other related individuals or entities a restricted investor with any interest in an alcohol beverage producer or wholesaler? Yes No
 If yes, provide the name of the restricted investor and describe the nature of the interest.

4. Have the partners, agent, or sole proprietor satisfied the responsible beverage server training requirement for this license period? Submit proof of completion. Yes No

5. Is the applicant business indebted to any wholesaler beyond 15 days for beer or 30 days for liquor/wine? Yes No

6. Does the applicant business owe past due municipal property taxes, assessments, or other fees? Yes No

Part C: Individual Information

Check each box to attest that you have provided the appropriate supplementary information to complete your application. See the instructions for Part C of this application, beginning on page 2, to complete this section.

I have accurately listed and provided contact and personal information for all required persons involved in the applicant business and any business identified in Part A, Question 6 using Form AB-200AA.

I have provided an accurate Form AB-100 for each person listed in Form AB-200AA.

(For corporations, limited liability companies, and nonprofit organizations only) I have provided an accurate Form AB-101 to appoint an agent on behalf of my business.

I understand that my application is not complete until this supplementary paperwork is received by the municipal clerk where I am applying for an alcohol beverage license.

Part D: Attestation

One of the following must sign and attest to this application:

- sole proprietor
- one general partner of a partnership
- one corporate officer
- one member of an LLC

READ CAREFULLY BEFORE SIGNING: Under penalty of law, I have answered each of the above questions completely and truthfully. I agree that I am acting solely on behalf of the applicant business and not on behalf of any other individual or entity seeking the license. Further, I agree that the rights and responsibilities conferred by the license(s), if granted, will not be assigned to another individual or entity. I agree to operate this business according to the law, including but not limited to, purchasing alcohol beverages from state authorized wholesalers. I understand that lack of access to any portion of a licensed premises during inspection will be deemed a refusal to allow inspection. Such refusal is a misdemeanor and grounds for revocation of this license. I understand that any license issued contrary to Wis. Stat. Chapter 125 shall be void under penalty of state law. I further understand that I may be prosecuted for submitting false statements and affidavits in connection with this application, and that any person who knowingly provides materially false information on this application may be required to forfeit not more than \$1,000 if convicted.

Last Name <i>Chiraghodin</i>	First Name <i>Inderyas</i>	M.I. <i>None</i>
Title <i>Owner/Manager</i>	Email	Phone <i>608-799-4957</i>
Signature <i>Inderyas</i>		

Part E: For Clerk Use Only

Date Application Was Filed With Clerk	License Number	Date License Granted	Date License Issued
Signature of Clerk/Deputy Clerk			Date Provisional License Issued (if applicable)

License Number	License Type	Business Name	DBA	Business Address
ALC007594-04-2025	Class "A" Beer	MEMA ENTERPRISES LLC	CITGO ON STATE	1914 STATE RD

Sales and Service Description: *Entire building located at 1914 State Rd.*
Storage Description: *Storage within building and cooler.*

Business License Contacts

Name	Address	Business Phone	Mobile Phone	Home Phone	Contact Type(s)
MARGARET Alice ANDERSON- CHIRAGHDIN	N1935 SUMMIT DR LA CROSSE, WI 54601				Member
INDERYAS CHIRAGHDIN	N1935 SUMMIT DR LA CROSSE, WI 54601				Agent Member

License Number	License Type	Business Name	DBA	Business Address
ALC007593-04-2025	"Class A" Liquor	MEMA ENTERPRISES LLC	CITGO ON STATE	1914 STATE RD

Sales and Service Description: *Entire building located at 1914 State Rd.*
Storage Description: *Storage within building and cooler.*

Business License Contacts

Name	Address	Business Phone	Mobile Phone	Home Phone	Contact Type(s)
MARGARET Alice ANDERSON- CHIRAGHDIN	N1935 SUMMIT DR LA CROSSE, WI 54601				Member
INDERYAS CHIRAGHDIN	N1935 SUMMIT DR LA CROSSE, WI 54601				Agent Member

Cigarette, Tobacco, and Electronic Vaping Device Retail License Application

FOR CLERKS ONLY
Municipality
License Period

Part A: Premises/Business Information			
1. Legal Business Name (individual name if sole proprietor) Mema Enterprises LLC			
2. Business Trade Name or DBA Citgo on State			
3. FEIN 99-2193995	4. Wisconsin Seller's Permit Number 456-1031704198-04		
5. Entity Type (check one) <input type="checkbox"/> Sole Proprietor <input type="checkbox"/> Partnership <input checked="" type="checkbox"/> Limited Liability Company <input type="checkbox"/> Corporation			
6. State of Organization Wisconsin	7. Date of Organization 3/19/2024	8. Wisconsin DFI Registration Number M131386	
9. Premises Address (do not use PO Box) 1914 State Rd			
10. City La Crosse	11. State WI	12. Zip Code 54601	
13. County La Crosse	14. Governing Municipality: <input checked="" type="checkbox"/> City <input type="checkbox"/> Town <input type="checkbox"/> Village of: La Crosse	15. Aldermanic District	
16. Mailing Address (if different from premises address) 1			
17. City	18. State	19. Zip Code	
20. Premises Phone	21. Premises Email	22. Website	
23. Premises Description - Describe the building or buildings where cigarettes, tobacco products, and electronic vaping devices are to be sold and stored. Describe all rooms including living quarters, if used, for the sales and/or storage of cigarettes, tobacco products, and electronic vaping devices and records. Cigarettes, tobacco products, and electronic vaping devices may be sold and stored ONLY on the premises described in this application. Attach a floor plan if possible.			

Part B: Questions	
1. What products will be sold at this business location? (check all that apply)	
<input checked="" type="checkbox"/> Cigarettes	<input checked="" type="checkbox"/> Tobacco Products <input checked="" type="checkbox"/> Electronic Vaping Devices
2. How will cigarettes, tobacco, and/or electronic vaping devices be sold? (check all that apply)	
<input checked="" type="checkbox"/> Over the counter	<input type="checkbox"/> Vending machine
3. Is the applicant business owned by another business entity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, provide the name(s) and FEIN(s) of the business entity(s) below. Attach additional sheets if necessary	
3a. Name of Business Entity: _____	
3b. FEIN of Business Entity: _____	

Part C: Individual Information

List the name, title, and phone number for each person or entity holding the following titles or positions in the applicant business and any businesses listed in Part B, Question 3: sole proprietor: all officers, directors, and agents of a corporation: all partners of a partnership: and all members and agents of a limited liability company. Attach additional sheets if necessary.

Include Form CTV-101, *Individual Questionnaire*, for each person listed below.

Last Name	First Name	Title	Phone
Chiraghdin	T Inderyas	Owner/Manager	
Anderson-Chiraghdin	Margaret	Owner	

Part D: Attestation

One of the following must sign and attest to this application:


- sole proprietor
- one general partner of a partnership
- one corporate officer
- one managing member of an LLC

READ CAREFULLY BEFORE SIGNING:

I understand and agree to the following:

- I will only purchase cigarettes, tobacco, and vapor products from distributors, jobbers, or subjobbers permitted by the Wisconsin Department of Revenue, unless I also hold the proper distributor's permit and pay all applicable excise taxes.
- I will not purchase or exchange products from another retailer, including transferring existing stock to a new owner.
- I will provide tobacco sales training that has been approved by the Wisconsin Department of Health Services to my employees. (<https://witobaccocheck.org>).
- I will not sell single cigarettes.
- I will not sell, give, or otherwise provide cigarettes, tobacco, or any nicotine products to minors.
- I will keep product invoices on the licensed premises for two years and ensure the records are available for inspection by law enforcement. Failure to comply with this will result in criminal penalties, including loss of inventory.
- I will not sell cigarettes or roll-your-own (RYO) tobacco products unless listed on the Wisconsin Department of Justice's directory of certified tobacco manufacturers and brands.
- I will not sell or offer for sale any electronic vaping device unless listed on the Wisconsin Department of Revenue's electronic vaping device directory.

Further, under penalty provided by law, I state that this application has been truthfully answered to the best of my knowledge. I agree to operate this business according to law and that the rights and responsibilities conferred by the license(s), if granted, cannot be assigned to another. Any lack of access to any portion of a licensed premises during inspection will be deemed a refusal to allow inspection. Such refusal is a misdemeanor and grounds for revocation of this license. Any person who knowingly provides materially false information on this application may be required to forfeit not more than \$1,000 if convicted.

Signature 	Date 4/13/26
Name (Last, First, M.I.) Chiraghdin T Inderyas	
Title Owner/Manager	Phone 608-799-4957

Part E: For Clerk Use Only

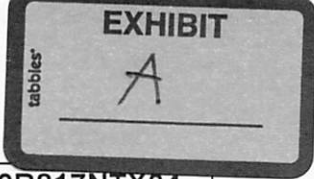
Date application was filed with clerk	Date license issued	Date license expires	License number
License fees	Signature of Clerk/Deputy Clerk		

License Number	License Type	Business Name	DBA	Business Address
CIG007595-04-2025	Cigarette, Tobacco and Electronic Vaping Device	MEMA ENTERPRISES LLC	CITGO ON STATE	1914 STATE RD

Sales and Service Description:
Storage Description:

Business License Contacts

Name	Address	Business Phone	Mobile Phone	Home Phone	Contact Type(s)
MARGARET Alice ANDERSON- CHIRAGHDIN	N1935 SUMMIT DR LA CROSSE, WI 54601				Member
INDERYAS CHIRAGHDIN	N1935 SUMMIT DR LA CROSSE, WI 54601				Agent Member



You are Notified to Appear

Appearance Required: YES **OCT-15-2025** **08:30 AM**

LA CROSSE CITY MUNICIPAL COURT
400 LA CROSSE ST
LA CROSSE, WI 54601 (608) 789-7290
CITYOFLACROSSE.ORG/MUNICIPALCOURT

Form No. and Version CT

MUNI 0405 **0B817NTX04**
Juvenile DEPOSIT Cash- Card
\$313.00 N N
Court Use: DA N

Defendant (Last Name, First, Middle), Street Address, P.O. Box, City, State, Zip

TARIQ, MUHAMMAD
[Redacted Address]

Birth Date [Redacted] Sex M Race A
HT [Redacted] WT [Redacted] Hair [Redacted] Eyes [Redacted]

Driver License/Identification Card Number [Redacted] State [Redacted] Exp. Yr. [Redacted]

Other Identification Number [Redacted] ID Type [Redacted]

License Plate Number [Redacted] Plate Type [Redacted] State [Redacted] Exp. Yr. [Redacted]

Vehicle Identification Number [Redacted] Telephone Number [Redacted]

Name and Address of Parent/Guardian/Legal Custodian (If minor defendant)

Telephone Number of Parent/Guardian/Legal Custodian

Plaintiff

CITY OF LA CROSSE

Ordinance Violated

4-6

Adopting State Statute

Violation Description

Agency Space

10-25-39593

Ordinance Description

SALE/FURNISH LIQUOR TO UNDERAGE

Week Day Date Time

THURSDAY 09/04/2025 07:05 PM

From/AT Hwy No. and/or Street Name

ON STATE RD/033 EAST 200 FT E OF 19TH ST

County City/Village/Town

LA CROSSE - 32 LA CROSSE - 54, CITY

Officer Name

OFFICER MICHAEL ABRAHAM

Date Citation Served, Method

09/04/2025 IN PERSON

Officer ID Department

2656 LA CROSSE POLICE DEPARTMENT

Residence Contact Name Age

(If left with person at defendant's address)

Victim

Birth Date Restitution Requested

INSTRUCTIONS - READ CAREFULLY

Police # 10-25-39593

CONDUCTING UNDERAGE COMPLIANCE CHECK AT CITGO ON STATE RD. USED UNDERAGE (20 YEAR OLD) VOLUNTEER TO ATTEMPT TO PURCHASE ALCOHOL. MINOR SELECTED TWO "BEAT BOX" 11.1% ALCOHOL DRINKS FROM COOLER. AT COUNTER, CLERK DID NOT ASK FOR ID. PROVIDED DESCRIPTION

I SPOKE WITH DEFENDANT WHO WAS BEHIND COUNTER AND MATCHED DESCRIPTION. HE STATED HE ID'D EVERYONE THAT CAME IN. SAID HE ASKED FOR ID FROM DEFENDANT.

ASKED FOR A BREAK BECAUSE IT WAS HIS FIRST TIME. EXPLAINED CITE AND COURT

AR PHOTO DL

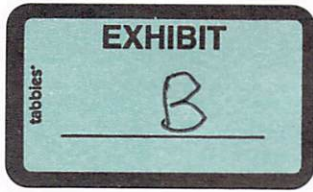
WISCONSIN NON TRAFFIC CITATION

Citation #
0B817NTX04

BWC AND UNDERCOVER VIDEO ON

WISCONSIN NON TRAFFIC CITATION
2 of 2

Citation #
0B817NTX04



INCIDENT #: 25-51921
CONTAINS JUVENILE INFO:

LA CROSSE POLICE DEPARTMENT ver. 11

REPORT DATE: 11/17/26

REPORT TIME: 11/17/25

REPORT TYPE: INITIAL

SUPPLEMENTAL

CALL TYPE PER CAD: Bar Check

LOCATION: 1914 State Rd. La Crosse, WI, 54601 (Citgo)

INCIDENT DATE/TIME: 11/17/25 @ 1017 hrs

OFFICER/BADGE NUMBER: SGT. D. Mandujano #2152
SUPERVISOR APPROVING REPORT & BADGE NUMBER: Sgt. Gyllander 2212

SQUAD # & VIDEO: No squad M/V // BWC operational

PHOTOS: Yes, work phone

COPIES TO DA's Office, Social Services, etc):

DA 5/1/26 NS

List ALL Victims, Complainants, Witnesses, Others, Arrested WITH all charges listed, statutes, AND was the person JAILED / SIG-BONDED / CITED AND RELEASED / CITATION MAILED:

OTHER:

Israr A. Khan

DOB: [REDACTED]

M/A

Address: [REDACTED]

Phone: not provided

Employment: Citgo

Veteran: None

OTHER:

Inderyas (Tony) NMI Chiraghdin

DOB: [REDACTED]

M/A

Address: [REDACTED]

Phone: [REDACTED]

Employment: Owner of Citgo

Veteran: None

OTHER:

Margaret (Sue) A. Anderson-Chiraghdin

DOB: [REDACTED]

Address: [REDACTED]

Phone: [REDACTED]

Employment: Citgo Owner

PROPERTY (only property not entered through the evidence module):

CRIME VICTIM/WITNESS SHEET PROVIDED (Y/N):

ACT 268:

WEAPON(S) USED (Y/N):

Description of weapon(s):

How weapon is involved:

Where is the weapon now/who has possession (their information):

Are there other weapons:

Prior concerns with weapons in the past (gathered from witnesses, complainant, consumer themselves):

ASSOCIATED CHARGES: 450.11 (7)(h)

BIAS:

VICTIM TO OFFENDER RELATIONSHIP:

DOMESTIC RELATED (Y/N):

DOMESTIC LETHALITY ASSESSMENT (Y/N):

LETHALITY PRESENT (Y/N):

DOMESTIC QUALIFIERS:

NEW HORIZONS CONTACTED (Y/N):

NO CONTACT WITH:

SUPPLEMENTAL INVESTIGATION REQUIRED (detailed below):

SUMMARY:

On 11/11/25 I conducted a bar check at Citgo Gas station located at 1914 State Rd. with the Department of Revenue Alcohol Division. During my check I located several concerning items related to the consumption of illegal substances to experience a high. Several generic Viagra pills were located which are only available by prescription. These pills were seized and further investigation is being conducted to determine if criminal charges will be filed.

NARRATIVE:

BAR CHECK:

On 11/17/25 Officer Abraham, The Department of Revenue Alcohol Division, and I conducted a bar check at the Citgo gas station. During this check we observed their invoices for their alcohol purchases were not organized and dated as required by the state. They were educated on how to fix this. We also discovered several "legal" items that are commonly used for ingesting illegal substances.

CRIME STOPPERS TIP/INFORMATION:

The La Crosse Police Department has received Crime stoppers tips expressing concern that Citgo does not check individual ID's when alcohol is purchased. The tipster explained that underage individuals know this and will actively travel to this location to obtain alcohol. They failed a compliance check earlier this year and were cited for failure ref #25-39593.

There was also information provided that in the past they have sold "everything but kits" which in street terms means individuals could purchase kits containing glass pipes, steel wool, matches, and small tin containers to assist in their consumption of illegal drugs. These items individually are not concerning but when sold cause for concern as they can be used together to heat up, filter, and consume illegal substances.

ITEMS LOCATED:

During our inspection we located a variety of legal items behind the counter and in the back storage area. These items are legal to possess and by themselves are not a concern but when sold in combination with other items and from my training and experience conducting drug investigation, Drug Recognition Expert evaluations and interacting with the public over my career there is a concern with what these items are being used for. The following was discovered:

Glass pipes:

There were hundreds of clean glass pipes which are commonly used by individuals to consume illegal substances ranging from THC, cocaine, methamphetamines and even heroin. The substances are traditionally heated up and ingested by inhaling the substance.



Gem baggies:

We located numerous clean clear gem sized baggies which are commonly used to store and transport illegal substances by individual users. These were decorated with a variety of markings ranging from THC leaves to other colorful designs.



Nitrous oxide:

We located hundreds, if not thousands of nitrous oxide cans ranging in sizes from large (2KG) to single serving N2O cream chargers (9oz). These are commonly sold and used in the food industry by chefs and bakers for whip cream dispensers. The ones that were located at Citgo were flavored and Citgo is not known to take part in any food creation or distribution besides the prepacked food they order and sell as part of their business.

These “whippets” are commonly utilized by individuals to get a short high that causes euphoria and a feeling of detachment. Symptoms of use can be a loss of consciousness, dizziness, slurred speech, blurred vision, and headaches. These can be very dangerous to users and cause brain damage, nerve damage, and dependency. I spoke with the cashier at the time of the check and when asked why they had them he could not provide an answer and confirmed they did sell them.

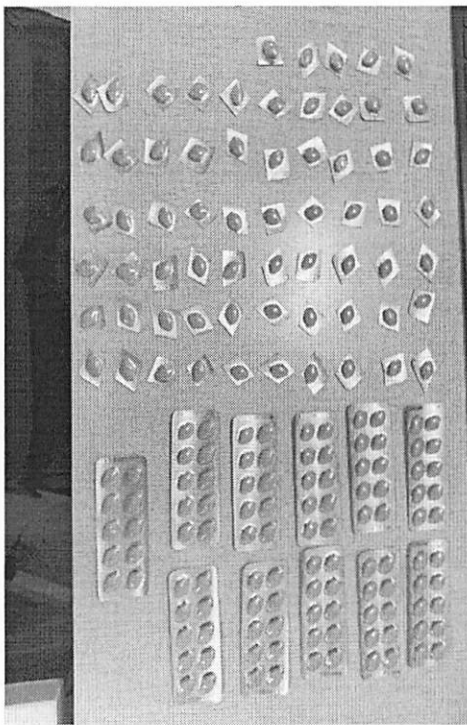
A few weeks prior to our compliance check our patrol staff responded to a call for service involving child neglect and it was discovered the dad of a small child was utilizing the exact same brand (Exotic Whip) and size nitrous oxide can that was sold at Citgo. He used them to get “high” and passed out while he was watching his child. This is why police were called to his residence. See case #25-49903 for further information.





Malegra Tablets:

Underneath the counter we located a small box which contained 175 Malegra (Sildenafil) 200mg tablets. They are commonly known as Viagra and used to treat erectile dysfunction. These are only available by prescription in the United States. I asked the cashier at the time what these were for and he stated they sell them for \$7 each to anyone who asks. He could not provide a prescription, and these pills were seized.

A screenshot of a medical information page for Sildenafil. The page includes the following text:

Sildenafil (Rx)

Generic name: sildenafil (drug [*sd-DEN-oh-fee*])

Brand names: Revatio, Viagra, Vitrinque

Drug classes: Agents for pulmonary hypertension; Impotence agents

Medicines reviewed by Keri, Barbara, MD, last updated on Jan 14, 2020.

Uses Warnings Before taking Dosage Side effects Interactions FAQ

What is sildenafil?

Sildenafil relaxes muscles of the blood vessels and increases blood flow to particular areas of the body.

Sildenafil under the name Viagra is used to treat erectile dysfunction (impotence) in men.

Another brand of sildenafil is Revatio, which is used to treat pulmonary arterial hypertension and improve exercise capacity in men and women.

Sildenafil is also available as Vitrinque oral film.

Do not take Viagra while also taking Revatio.

DRUG STATUS

- Availability: Prescription only
- Pregnancy & Lactation: Risk data available
- CSA Schedule*: N/A (Not a controlled drug)
- Approval History: Drug history at FDA

User Reviews & Ratings

8.3 / 10 305 Review

Images

Two white, round tablets are shown side-by-side. They appear to be the same as the ones in the blister pack shown in the adjacent image.

ATTEMPTED CONTACT WITH INDERYAS CHIRAGHDIN:

I obtained information from city Clerk to determine who the owner of the gas station was. I called Inderyas Chiraghdin to speak with him about the concerning items that were located at his gas station including the available only by prescription tablets that were located and allegedly being sold over the counter, but he did not answer. The voice mailbox was full, and I have not been able to contact him at this time. I will be stopping out at his residence for further follow-up.

ATTEMPTED CONTACT WITH MARGARET A. ANDERSON-CHIRAGHDIN:

According to the City Clerk Margaret is listed as an owner of the gas station as well. I called her and left a voice mail requesting she call me back to discuss the items that were located at the gas station during our check. I have not received a phone call back. I will be stopping out at her address for further follow-up.

DEPARTMENT OF REVENUE/DIVISION OF ALCOHOL:

Please see attached DOR/DAB report for further information on their findings.

DISPOSITION:

During a compliance check I located several concerning items at the Citgo gas station. I have not contacted the owners of the gas station as they have not returned my phone calls. I will be following up at their residence to address these items.

25-51921 Photos





GOLD WHIP

PREMIUM EUROPEAN QUALITY

NHIP. INFUSE. FOAM.

NITROUS OXIDE UN1070 E942 FOR FOOD PURPOSES ONLY

[EN] ENGLISH
 UN1070 NITROUS OXIDE E942 FOOD GRADE TO BE USED FOR COCKTAILS, CULINARY DRINKS, CAKES AND WHIPPED CREAM. CONTAINS GAS UNDER PRESSURE. DO NOT EXPOSE TO TEMPERATURES EXCEEDING 50°C. PROTECT FROM SUNLIGHT. NON-REFILLABLE CYLINDER.

[FR] FRENCH
 UN1070 PROXYDE D'AZOTE E942 DE QUALITE ALIMENTAIRE A UTILISER POUR COCKTAILS, LES BEVERAGES CULINAIRES, LES GATEAUX ET LA CREME FOUETTÉE. CONTIENT DU GAZ SOUS PRESSION. NE PAS EXPOSER A DES TEMPERATURES SUPERIEURES A 50°C. PROTEGER CONTRE LES RAYONS DU SOLEIL. CYLINDRE NON RECHARGEABLE.

[ES] SPANISH
 UN1070 ÓXIDO NITROSO CON GRADO ALIMENTARIO E942. PARA USAR EN COCTELES, CULINARIOS, PASTILES Y HATA MONTADA. CONTIENE GAS A PRESIÓN. NO EXPONER A TEMPERATURAS SUPERIORES A 50°C. PROTEGER DE LA LUZ SOLAR. BOMBONA NO RECARGABLE.

[DE] GERMAN
 UN1070 DISTIESTOFFNITROSO E942 NUTZSTUFENQUALITÄT ZUR VERWENDUNG FÜR COCKTAILS, KUCHEN UND SCHLAGSAUCE. ENTHÄLT GAS UNTER DRUCK. NICHT AN CH. NICHT TEMPERATURN VON ÜBER 50°C AUSSETZEN. NICHT BEI SONNENLICHT BEHALTEN. NICHT WIEDERFÜLLBAR.

[DA] DANISH
 UN1070 NITROGENOXID E942 FØDEVAREREGNINGET. BRUGES TIL COCKTAILS, KULINARISKE RETTER, KAGER OG RØRDESMØR. INDEHOLDE GAS UNDER TRYK. IKK UDSÆTTES FOR TEMPERATURER OVER 50°C. BEHOLD I TØRT SØKLE. UGENNOPFYLDELIG CYLINDER.

[NL] DUTCH
 UN1070 DISTIESTOFFNITROSO E942 VOEDSELKwaliteit. TE GEBRUIKEN VOOR COCKTAILS, CULINAIRE GERECHTEN, TAARTEN EN SLAGROOM. BEVAT GAS. ONDER DRUK. NIET BLOOTSTELLEN TEMPERATUREN BOVEN 50°C. BESCHERMEN TEGEN ZONLICHT. NIET HERVULBARE CYLINDER.

[SV] SWEDISH
 UN1070 SVAVELIGT E942 NÄRINGSKVALITÄT. ANVÄNDS FÖR COCKTAILS, KÄKAR OCH RÖRDESMÖR. INNEHÅLLER GAS UNDER TRYK. IKK UTSÄTTES FÖR TEMPERATURER ÖVER 50°C. BEHÅLL I TORKTILLÄG. UGENNÖPPLÄG CYLINDER.

[FI] FINNISH
 UN1070 DITIVOKSIDIN E942 ELÄINTÄKÄÄTTÄÄN KÄYTTÄÄN COCKTEILEIN, KÄKÄISSÄ JA RÖYRISSÄ. PAKKAUSKUNNALLIEN KÄYTTÖÄ VÄLILÄÄLLÄ. KAASUN ALLA SUUNNITTELU. SUUNNITTELU. SUUNNITTELU. SUUNNITTELU.

OXIDIZER 5.1

NON-REFILLABLE

NET WT 470 g (16.55 oz)

UN1070 CLASS 2.2L1

HAZARDOUS

NITROUS OXIDE

GOLD WHIP GOLD EDITION

NITROUS OXIDE

EUROPE'S LEADING BRAND

GOLD WHIP GOLD EDITION

NITROUS OXIDE

EUROPE'S LEADING BRAND



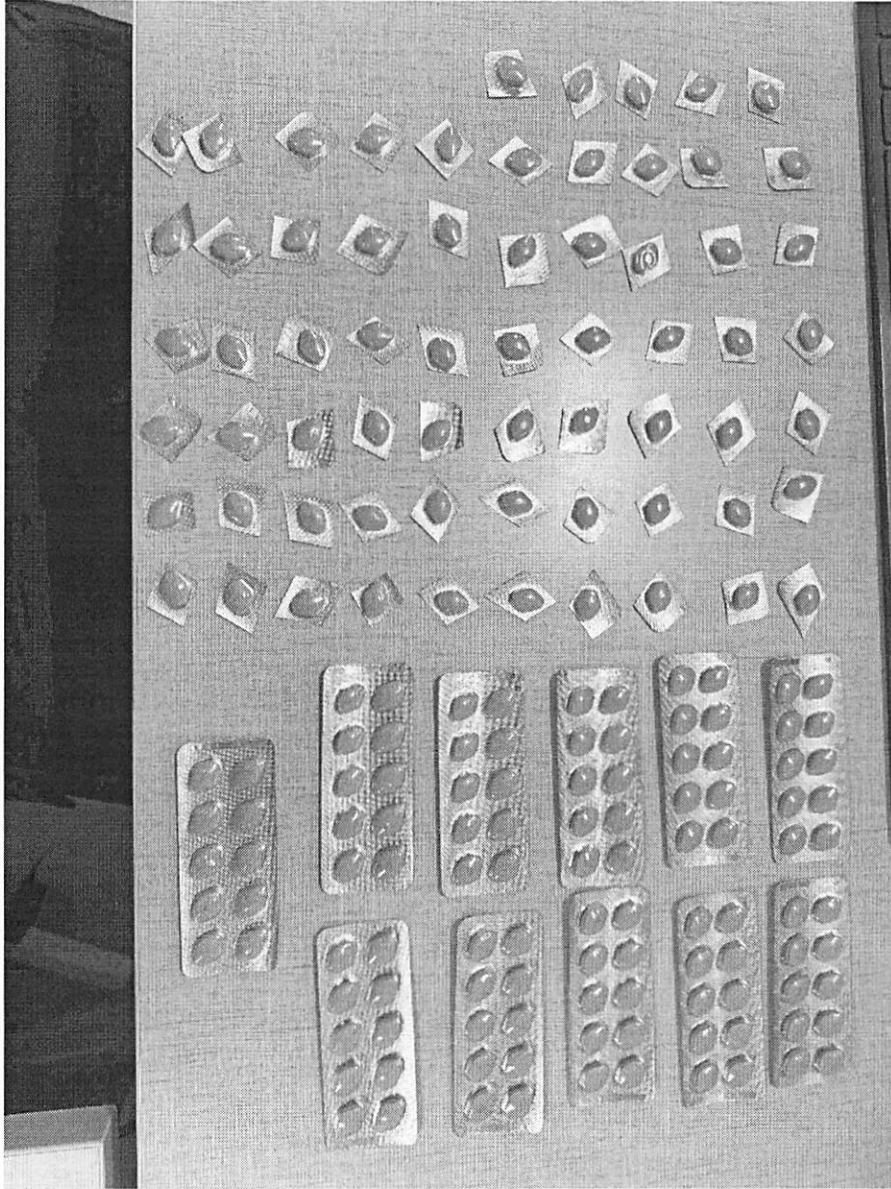


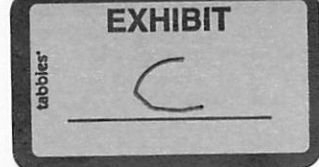












CASE ACTIVITY REPORT

WISCONSIN DEPARTMENT OF REVENUE
ALCOHOL AND TOBACCO ENFORCEMENT UNIT

CASE # 25-11-638	DATE: January 23, 2026	CASE TITLE: Mema Enterprises LLC Agent: Inderyas Chiraghdin
ACTIVITY: Alcohol Inspection		DATE OF ACTIVITY: November 17, 2025

On 11/17/2025, Division of Alcohol Beverages Special Agent Diana ANDERSON and I conducted a liquor inspection at Mema Enterprises LLC, doing business as "Citco on State," located at 1914 State Rd, in the City of La Crosse, La Crosse County. This inspection was part of a wider task-force inspection in the City of La Crosse. La Crosse PD advised of multiple complaints and concerns with this business for alcohol law violations and criminal activity associated with drug use and loitering. La Crosse PD officers were present for this inspection.

We arrived at the business, and it was open to the public. Inside, we located the only employee, identified as ISRAR KHAN [REDACTED]. KHAN was a licensed operator with the City of La Crosse. KHAN advised that the owner, INDERYAS CHIRAGHDIN, was currently out of the country. I spoke with his wife by phone and advised of the inspection.

KHAN was cooperative and allowed access to the entire premises for inspection. This business possessed a "Class A" liquor/beer combo license for retail sales. There were invoices on premises, but they were disorganized and not arranged according to date/vendor. Overall, the business was in compliance with the possession and sale of intoxicating beverages.

During this inspection, I noted numerous items of concern related to possible criminal activity, that would also most likely encourage loitering. Agent ANDERSON and I found numerous "pills" in different locations. Using "drug identifier" on Drugs.com, I was able to confirm that some were diabetic medication, but there were individually wrapped blue pills labeled "Malegra 200mg," produced by "Sunrise Remedies." These pills were confirmed to be erectile dysfunction pills only available by prescription. There were about 50 individually foil packaged pills in a box under the sales counter. Based on my training and experience, I knew these were ready for individual over-the-counter sale.

Also located in the storage areas of this store were 100s of small, "one-hitter" glass pipes, most commonly used to smoke crack cocaine or methamphetamine out of. The significant amount of product indicated, the proximity to the customer sales counter, led me to believe this was a common item sold by this store. The average price appeared to be about \$4.00/pipe.

I located whippet cannisters and Nitrox-brand flavored cannisters, known to be used as inhalants. These were also present behind the sales counter. These canisters are often abused by people to get an intense, euphoric high that causes serious health concerns. Use of these products in this manner is illegal. The "Nitrox" type is branded for the use to make flavored whip cream for desserts and had no real use in the large quantities in a corner gas station/convenience store.

La Crosse PD officers and I discussed our concerns with the clerk regarding the activity that has been reported at this location. I explained that compliance with all laws is necessary in order to maintain liquor licenses.

I also suspected that there were numerous illegal vape products being sold at this store. I advised I was going to refer this case to the Cigarette/Tobacco/Vape unit for inspection.

The clerk signed the Field Report, and I left a copy for the owner's reference.

This case was turned over to La Crosse Police.

CONTACTS:

ISRAR A. KHAN (Employee)

m/w [REDACTED]
[REDACTED]

INDERYAS CHIRAGHDIN (Agent)
[REDACTED]

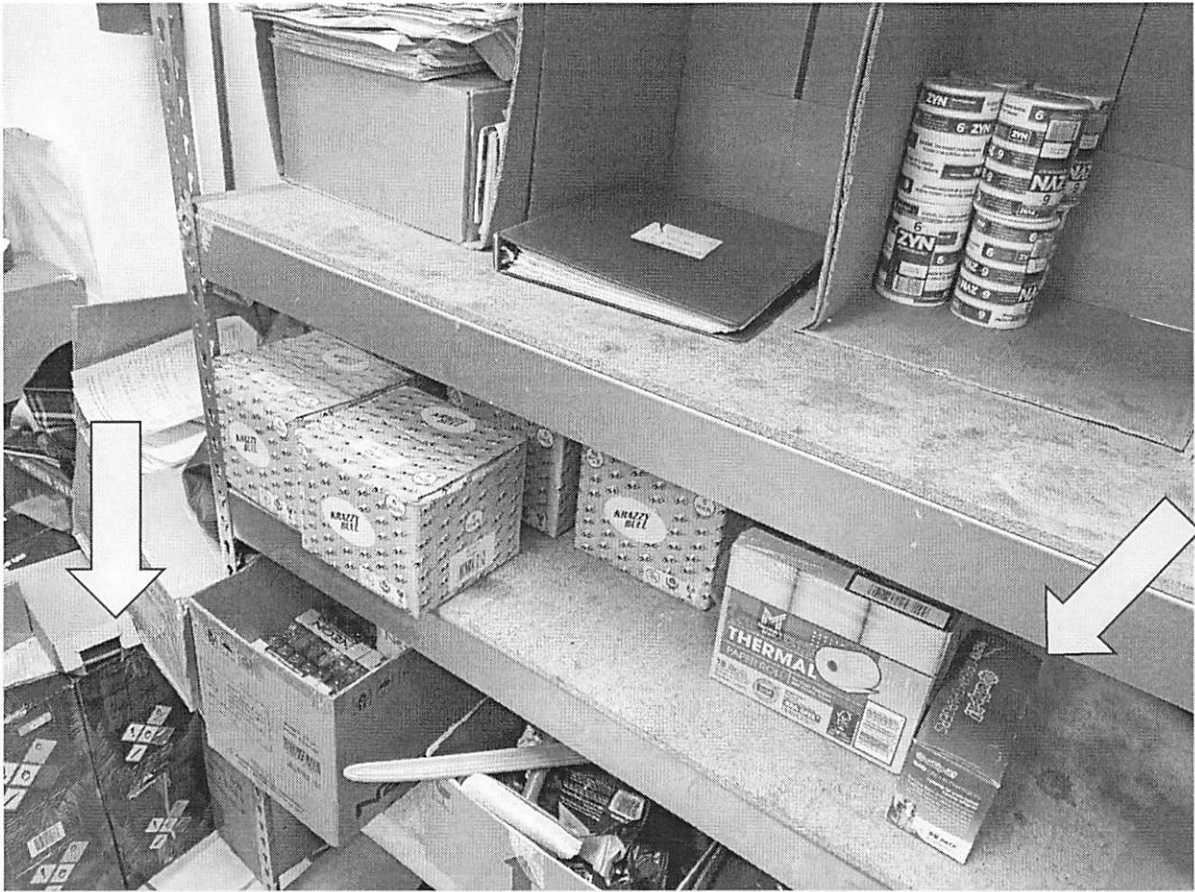
END OF REPORT -HM

End of Report.

AGENT(S): SA HOLLY MCMANUS

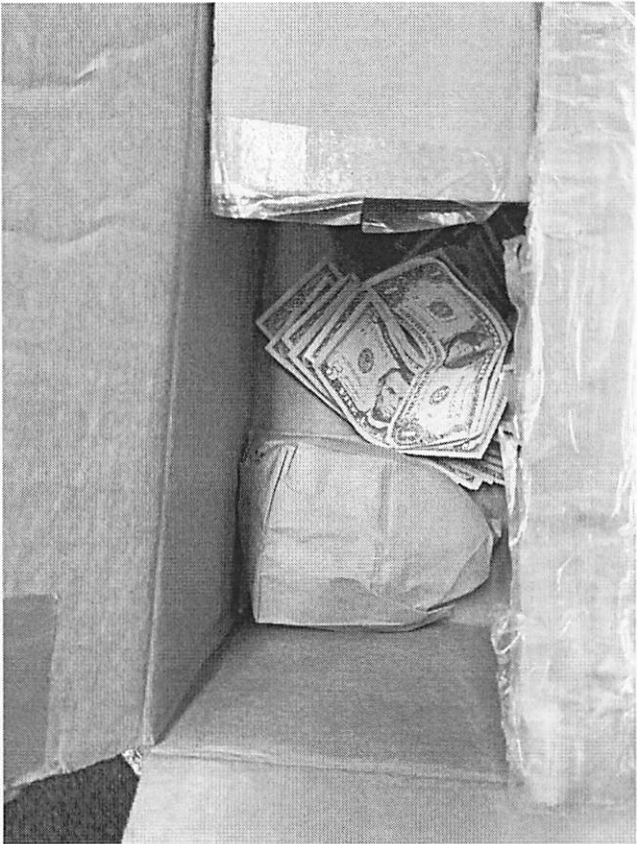
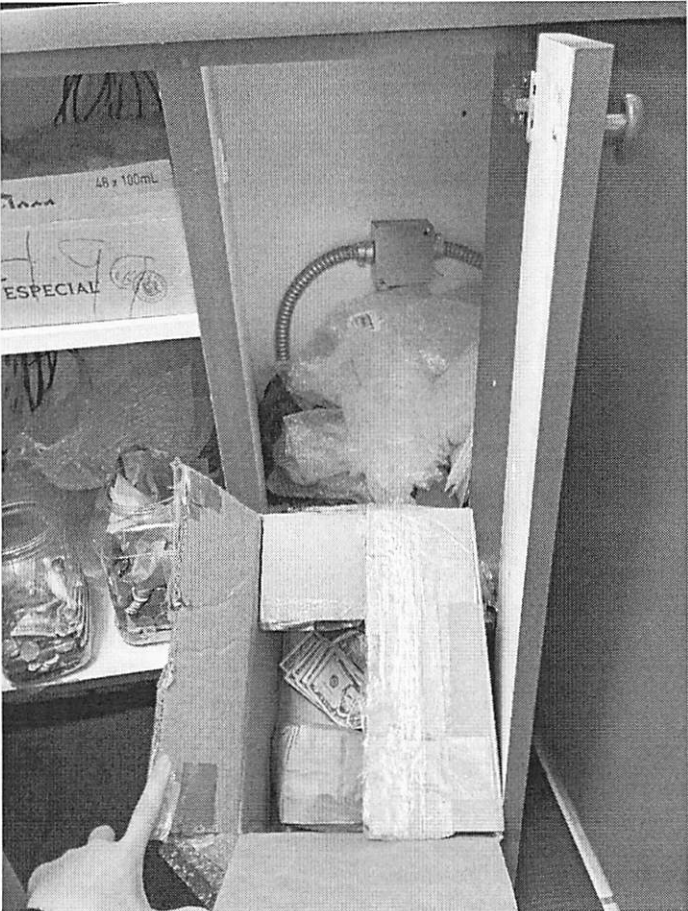
This document contains neither recommendations nor conclusions of the Alcohol & Tobacco Enforcement Section, Wisconsin Department of Revenue. It is the property of this section and is loaned to your agency. Its contents are not to be distributed outside your agency.

AT-221





DOR 25-11-638
Citco on Main





INCIDENT #: 26-04730
CONTAINS JUVENILE INFO:

LA CROSSE POLICE DEPARTMENT ver. 11

REPORT DATE: 02/04/26

REPORT TIME: 1053 hrs

REPORT TYPE: INITIAL

SUPPLEMENTAL

CALL TYPE PER CAD: Bar Check

LOCATION: 1914 State Rd. La Crosse, WI, 54601

INCIDENT DATE/TIME: 02/04/26 1053 hrs

OFFICER/BADGE NUMBER: SGT. D. Mandujano #2152
SUPERVISOR APPROVING REPORT & BADGE NUMBER: Sgt. Gyllander 2212

SQUAD # & VIDEO: No squad // BWC activated
PHOTOS:

COPIES TO DA's Office, Social Services, etc):
DA, MC 3/4/26 NS

List ALL Victims, Complainants, Witnesses, Others, Arrested WITH all charges listed, statutes, AND was the person JAILED / SIG-BONDED / CITED AND RELEASED / CITATION MAILED:

ARRESTED/RELEASED ON SIGNATURE BOND:

Inderyas NMI Chiraghdin

DOB: [REDACTED]

M/A

Height: [REDACTED]

Weight: [REDACTED]

Hair: [REDACTED]

Eyes: [REDACTED]

Address: [REDACTED]

Phone: [REDACTED]

Employment: Owner of Citgo

CHARGES:

Delivery of prescription medication 450.11(7)(g)

Citation:

Failure to post signage – Hemp-derived cannabinoids
32-165(B)(5)1

OTHER:

Israr A. Khan

DOB: [REDACTED]

M/A

Address: [REDACTED]

Phone: [REDACTED]

OTHER:

Jessica A. Moulis

DOB: [REDACTED]

F/W

Address: [REDACTED]

Phone: [REDACTED]

Employment: Unknown

OTHER:

Catara M Schneider

DOB: [REDACTED]

Work Address: [REDACTED]

Work Phone Number: [REDACTED]

Employment: Mayo Clinic

PROPERTY (only property not entered through the evidence module):

CRIME VICTIM/WITNESS SHEET PROVIDED (Y/N):

ACT 268:

WEAPON(S) USED (Y/N):

Description of weapon(s):

How weapon is involved:

Where is the weapon now/who has possession (their information):

Are there other weapons:

Prior concerns with weapons in the past (gathered from witnesses, complainant, consumer themselves):

ASSOCIATED CHARGES:

BIAS:

VICTIM TO OFFENDER RELATIONSHIP:

DOMESTIC RELATED (Y/N):

DOMESTIC LETHALITY ASSESSMENT (Y/N):

LETHALITY PRESENT (Y/N):

DOMESTIC QUALIFIERS:

NEW HORIZONS CONTACTED (Y/N):

NO CONTACT WITH:

SUPPLEMENTAL INVESTIGATION REQUIRED (detailed below):

SUMMARY:

On February 4th 2026 I conducted a compliance check at the Citgo gas station located at 1914 State Rd. During the check I located 22 sildenafil tablets which are only available by prescription. This was the second time I located these illegal pills at this location. See case 25-51921 for further information on the original case. The establishment also did not have signage for their hemp-derive cannabinoid inventory. Inderyas Chiraghdin was arrested and released on a signature bond for delivery of prescription medication and cited for Failure to post signage – Hemp-derived cannabinoids.

NARRATIVE:

INITIAL CALL:

On February 4th 2026 I conducted a compliance check with the state of Wisconsin Department of tobacco and vape at the Citgo located at 1914 State Rd.

HISTORY:

The La Crosse Police Department has received numerous complaints about the illegal sale of tobacco and alcohol at this location. Citgo has also failed alcohol compliance checks in the past where more illegal prescription pills were located reference 25-51921. Several concerning items were located during this initial check and are still for sale at this location. These items include class pipes commonly used to consume illegal substance, gem baggies which are commonly used to store or transport illegal substance, and nitrous oxide which are used by individuals to get a short high.

CONTACT WITH ISRAR (CHRIS) KHAN:

Upon arrival I recognized cashier as Israr from my previous contacts and compliance checks at Citgo. I informed him we were conducting an inspection, and he was compliant and provided information he was asked for. Based on my previous compliance checks and knowledge of their distribution of illegal prescription pills I checked underneath the counter where the pills were located on my last check.

I located a cardboard box which contained numerous glass pipes wrapped in bubble wrap. I moved several of the pipes around and located 22 individually packaged pills inside of the box. These were cut individually from their original distribution packing. By piecing these today I could read "sildenafil" which is commonly known as Viagra and are used to treat erectile dysfunction but are utilized illegally by individuals on the street to enhance their sexual encounters. It also said on the package "available by prescription only". These were confirmed to be only available by prescription in the United States.

I asked Israr if they were still selling them and he stated they were. I asked them how much they were selling them for and he told me eight dollars. I asked him where he got them from and he stated, "the owner". I reminded him during our last inspection I told him they were not to sell these anymore and he stated the owner gave them to him and told him to sell them.

I then asked him what he did with the money he received from the purchase of these and he stated he put the money into the register and did not log the profit from the transaction on their point of sale system. Israr could not provide any more information about this. At this time Israr called the owner and asked him to come to the store. These pills were seized.

MALEGRA (SILDENAFIL) TABLETS:

I then went to confirm these tablets were available by prescription only. I utilized Drugs.com to confirm these tablets are only available by prescription. I confirmed this but had a difficult time finding the exact black color tablets and dosage of 200mg. I then contacted the Mayo Clinic pharmacy in La Crosse and spoke with pharmacist Catara M. Schneider. I provided her with the drug name and dosage, and she searched it in her database. She also confirmed the drug was only available by prescription and that the dosage available in the US is 25mg, 50mg, and 100mg. The dosage of 200mg was not available commercially in the US.

Home | Sildenafil

Sildenafil

Generic name: sildenafil (oral) [off-DMN or B]
 Brand names: Revatio, Viagra, Viburique
 Drug classes: Agents for pulmonary hypertension; impotence agents

Medically reviewed by Naji Durbin, MD, last updated on Jan 14, 2026

Uses | Warnings | Before taking | Dosage | Side effects | Interactions | FAQ

DRUG STATUS

- Rx** Availability: Prescription only
- P** Pregnancy & Lactation: Risk data available
- N/A** CSA Schedule*: Not a controlled drug
- ph** Approval History: Drug history at FDA

What is sildenafil?

Sildenafil relaxes muscles of the blood vessels and increases blood flow to particular areas of the body.

Sildenafil under the name Viagra is used to treat erectile dysfunction (impotence) in men.

Another brand of sildenafil is Revatio, which is used to treat pulmonary arterial hypertension and improve exercise capacity in men and women.

Sildenafil is also available as Viburique oral film.

Do not take Viagra while also taking Revatio.

User Reviews & Ratings
 8.3 / 10 500 Reviews

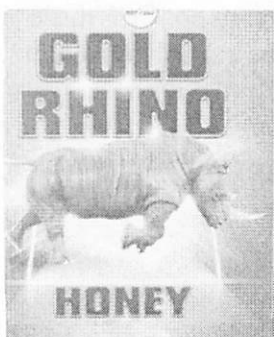
Images



CONTACT WITH INDERYAS (TONY) CHIRAGHDIN:

Inderyas arrived a short time later and I spoke with about the illegal drugs which were located underneath the counter. I asked him what they were doing with the pills and he told me “they are for sex” confirming he knew what the pills were for. He also confirmed they were selling them. He told me the last time a compliance check was conducted nobody reached out to him and thought they were legal. I informed him I was trying to call him but he did not answer. He told me he was in London for two weeks with his wife and when I told him I was trying to reach him for a month he said he might have gotten my calls because of “spam”. It should be noted on my last compliance check I told Israr the pills were illegal and they could not sell them. I asked him where he received the pills from and he said “Jesse or something” and described her as a female white, over 50, with brown hair. He did not know what she drove and did not believe he had her on camera. He provided her which was labeled under “Jason Pillar” in his phone. He said he calls or texts her when they need more of the pills. He stated he calls her every couple of months. He showed me a text message on Jan. 25th, 2026, which stated:
 Tony – “Are you coming to Citgo? This is Tony”
 Female – “I’ll be in around 830”

He told me she was a customer and that they sell “honey and Rhino” which are male enhancement supplements that are a “sexual enhancer”. These products are often unregulated as they are not approved by the FDA. He said she he was aware of this and said since they sell this enhancer, they should sell this one instead. He told me they have been selling them for about six months. He told me the money they make from the pills they put into the register and pay the “tax” on them which is not true because they are not obtaining these legally and they do not have an item in their point of sale.



I explained to Tony the pills were only available by prescription and that he was not able to sell them as they are to be prescribed by a doctor.

I then asked Tony what he did with the Nitros oxide he had in his store. He told me they were “whip cream chargers”. I asked him if they baked at Citgo and he stated “no”, so I asked him why he had these. He said people buy them here and he does not know what they do with them afterwards. I told him I believed he was selling them to people to “get high” and he said he didn’t know what they do with them. He asked then asked “are they illegal?”. I informed them they are not illegal. He told me they do not sell individual ones but sells them by the box for \$25 dollars which did not seem to be truthful. From a financial perspective a box of 10 sells for \$15 on Amazon so to make a profit he should be selling them for at least \$75. He became very defensive when I continued to question about this and told him my frustrations behind him selling these relating to an incident where police responded to a father who was watching his two-year-old and got high with an “exotic whip” container and passed out while the child was present.

I then returned to my squad car and spoke with DA Gruenke about my findings and agreed I could issue Tony as signature bond despite the charge of selling a prescription being a class H felony. I then completed a signature bond and issued it to Tony. During my explanation of the signature bond Tony was very defensive, argumentative, and did not seem to think what he was doing was wrong. He was given his court date and signed the bond. A copy was left with him.

FOLLOW UP CITATION:

After my compliance check I spoke with the City Attorney’s Office and determined Citgo should be issued a citation for Failure to post signage – Hemp-derived cannabinoids as they did not have any signs around there products. I went to Citgo and spoke with Tony and explained the ordinance and what measures he should take to be in compliance with it. He was given the citation and advised of his court date.

CONTACT WITH JESS MOULIS:

I looked up the phone number in our local database which was associated with Jess Moulis. I called the phone number but did not get an answer. I left a voice mail asking for a call back.

I received a phone call from Jess on 03/03/26 and I informed her of the reason I was calling her. She told me she knew the owner of Citgo from when she visited there but could not remember his name and described him as “Indian”. She confirmed her number was the one provided by Tony was hers. She stated she recently changed her phone number within the last month which from my research is inaccurate as she was a victim of a crime in 2025 and provided the phone number Tony gave me. When asked if she knew her old phone number she said she did not know it and when asked how long she had her old phone number she also did not have an answer. Not knowing your old phone number or how long you had your phone number is not a reasonable answer and I believe she was being deceptive.

When asked if she had any involvement with the pills she stated she was not a “male” and did not know anything about the pills. She could not provide any other information about this.

DISPOSITION:

During a compliance check on 02/04/26 I discovered 22 illegal Sildenafil tablets which were sold illegally as they are available only by prescription. Inderyas Chiraghdin was arrested and released on a signature for Delivery of prescription medication 450.11(7)(g) and cited for Failure to post signage – Hemp-derived cannabinoids 32-165(B)(5)1. No further follow up is needed.

LA CROSSE POLICE DEPARTMENT ver. 11

REPORT DATE: 04/30/26

REPORT TIME: 1900 hrs

REPORT TYPE: INITIAL

SUPPLEMENTAL

CALL TYPE PER CAD:

LOCATION:

INCIDENT DATE/TIME:

OFFICER/BADGE NUMBER: SGT. D. Mandujano #2152
SUPERVISOR APPROVING REPORT & BADGE NUMBER: Sgt Alex Burg / Badge #2532

SQUAD # & VIDEO: N/A

PHOTOS:

COPIES TO DA's Office, Social Services, etc):

Please send copy of initial and supplemental to ADA Kranz. 5/1/26 NS

List ALL Victims, Complainants, Witnesses, Others, Arrested WITH all charges listed, statutes, AND was the person JAILED / SIG-BONDED / CITED AND RELEASED / CITATION MAILED:

OTHER:

Inderyas NMI Chiraghdin

DOB: [REDACTED]

M/A

Height [REDACTED]

Weight [REDACTED]

Hair: [REDACTED]

Eyes: [REDACTED]

Address: [REDACTED]

Phone: [REDACTED]

Employment: Owner of Citgo

REFERRING CHARGES:

Delivery of prescription medication 450.11(7)(g)

PROPERTY (only property not entered through the evidence module):

CRIME VICTIM/WITNESS SHEET PROVIDED (Y/N):

ACT 268:

WEAPON(S) USED (Y/N):

Description of weapon(s):

How weapon is involved:

Where is the weapon now/who has possession (their information):

Are there other weapons:

Prior concerns with weapons in the past (gathered from witnesses, complainant, consumer themselves):

ASSOCIATED CHARGES:

BIAS:

VICTIM TO OFFENDER RELATIONSHIP:

DOMESTIC RELATED (Y/N):

DOMESTIC LETHALITY ASSESSMENT (Y/N):

LETHALITY PRESENT (Y/N):

DOMESTIC QUALIFIERS:

NEW HORIZONS CONTACTED (Y/N):

NO CONTACT WITH:

SUPPLEMENTAL INVESTIGATION REQUIRED (detailed below):

SUMMARY:

On 02/04/26 I conducted a bar check at 1914 State Rd. (Citgo) reference #26-04730 and discovered sildenafil tablets behind the counter which were being sold. After speaking with the District Attorney's Office I am referring Inderyas Chiraghdin for one count of Delivery of prescription medication 450.11(7)(g). See my initial report for further information.

NARRATIVE:

CONTACT WITH INDERYAS (TONY) CHIRAGHDIN:

On 02/04/26 Inderyas responded to Citgo after I told his employee to call him after locating more Sildenafil tablets behind the counter.

Upon his arrival, I spoke with him about the illegal drugs which were located underneath the counter. I asked him what they were doing with the pills and he told me, "they are for sex" confirming he knew what the pills were for. He also confirmed they were selling them. He told me the last time a compliance check was conducted (11/17/25) nobody reached out to him and thought they were legal. I informed him I attempted to call him but he did not answer. He told me he was in London for two weeks with his wife and when I told him I was trying to reach him for a month he said he might have gotten my calls because of "spam". It should be noted on my last compliance check I told Israr the pills were illegal and they could not sell them. I asked him where he received the pills from and he said "Jesse or something" and described her as a female white, over 50, with brown hair. He did not know what she drove and did not believe he had her on camera. He provided her which was labeled under "Jason Pillar" in his phone. He said he calls or texts her when they need more of the pills. He stated he calls her every couple of months. He showed me a text message on Jan. 25th, 2026, which stated:

Tony – "Are you coming to Citgo? This is Tony"

Female – "I'll be in around 830"

He told me she was a customer and that they sell "honey and Rhino" which are male enhancement supplements that are a "sexual enhancer". These products are often unregulated as they are not approved by the FDA. He said he was aware of this and said since they sell this enhancer, they should sell this one instead. He told me they have been selling them for about six months. He told me the money they make from the pills they put into the register and pay the "tax" on them which is not true because they are not obtaining these legally and they do not have an item in their point of sale. Tony did not provide any more information on these pills.

SUMMARY:

Based on Tony admitting to knowing he and his staff were selling the prescription medications I am referring this charge over to the District Attorney's office. I spoke with ADA Kranz and is aware of the incident.

PROPERTY RECEIPT

Wisconsin Department of Revenue
Office of Criminal Investigation
PO Box 8933
Madison WI 53708-8933
(608) 266-2776

Page 1 of 1

BY AUTHORITY OF
WISCONSIN STATUTE 98.09(1)

Date	County
Licensee	
Address of premises	
Municipality	
Trade name	

→ The following article(s) were confiscated from:

Ident. No.	Quantity	Size	Description of Article(s) (Brand, container size, content level, stamp number)	Opened	Sealed
1	1	EVD	<input type="checkbox"/> Untaxed <input type="checkbox"/> Unauthorized source <input type="checkbox"/> Vaping Device Directory <input type="checkbox"/> MSA		
2	1		<input type="checkbox"/> Untaxed <input type="checkbox"/> Unauthorized source <input type="checkbox"/> Vaping Device Directory <input type="checkbox"/> MSA		
3	3		<input type="checkbox"/> Untaxed <input type="checkbox"/> Unauthorized source <input type="checkbox"/> Vaping Device Directory <input type="checkbox"/> MSA		
4	1		<input type="checkbox"/> Untaxed <input type="checkbox"/> Unauthorized source <input type="checkbox"/> Vaping Device Directory <input type="checkbox"/> MSA		
5	2		<input type="checkbox"/> Untaxed <input type="checkbox"/> Unauthorized source <input type="checkbox"/> Vaping Device Directory <input type="checkbox"/> MSA		
6	4		<input type="checkbox"/> Untaxed <input type="checkbox"/> Unauthorized source <input type="checkbox"/> Vaping Device Directory <input type="checkbox"/> MSA		
7	1		<input type="checkbox"/> Untaxed <input type="checkbox"/> Unauthorized source <input type="checkbox"/> Vaping Device Directory <input type="checkbox"/> MSA		
			<input type="checkbox"/> Untaxed <input type="checkbox"/> Unauthorized source <input type="checkbox"/> Vaping Device Directory <input type="checkbox"/> MSA		

Signature of Agent _____ Witness _____
Signature of party from whom articles were obtained _____

→ Chain of Custody

Ident. No.	Quantity	Lab No.	Relinquished by (Signature)	Received by (Signature)	Date	Placement

→ Final Disposition

- Article(s) with Identification Number(s) _____
Returned to owner by Agent _____ Date _____
Received by _____ Date _____
- Ownership relinquished by _____ Date _____
- Article(s) with Identification Number(s) _____
Destroyed by _____ Date _____
Witnessed by _____ Title _____

N 2400154

WISCONSIN UNIFORM MUNICIPAL COURT CITATION AND COMPLAINT

Juvenile

*Deposit Permitted \$187.00

Cash Card

26-04736 (For Court Use only)

You Are Notified To Appear

Is this a mandatory appearance? yes no

(Read the reverse side of this citation for court information.)

Date March 18th 2026 Time 0830 AM PM

La Crosse Municipal Court

400 La Crosse St

La Crosse, WI, 54601

Defendant Name - Last First MI MEMA Enterprises LLC

Street Address Post Office State Zip Code 1914 State Rd La Crosse WI 54601

Driver License Number or Other I.D. (specify) State Exp. Yr.

Date of Birth Sex Race Height Weight Hair Eyes

License Plate Number Plate Type State Exp. Yr.

Plaintiff: City Village Town

OF: La Crosse

Defendant Violated: Ordinance No. 32-165(B)(5) Adopting State Statute No.

Description of Violation Hemp derived Cannabinoids signage

Week Day Month - Day - Year Time At: 1914 St Rd

Wed 02-04-26 1053 AM PM County: La Crosse

Name & Address of Parent/Guardian/Legal Custodian (if minor defendant)

Citation Served: Personally Mailed to defendant's last known address

Left with person residing at defendant's residence: Name (Tony) Indencas Age

Print Officer Name Department I.D. No. Date Citation Issued Telephone Number of Parent/Guardian/Legal Custodian

Sgt. D. Mandujano La Crosse 2152 02/18/26

MC-2000, 10/01

Police

COURT COPY

AGENCY RECORD

Date of Citation

FINDING:

PLEA:

Guilty Not Guilty Not Pleading

Guilty Default Dismissed

Forfeiture

Other Disposition:

Officer

Comments

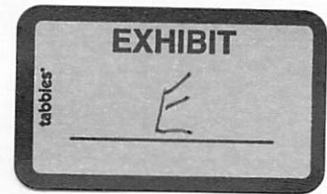
Incident Report

BMC operations.

See Report narrative for further.



LA CROSSE
POLICE DEPARTMENT
LEAD. PARTNER. PROTECT.



MEMORANDUM

DATE: June 5, 2026
TO: Judicial and Administration Committee
FROM: Sergeant D. Mandujano *D. Mandujano*
SUBJECT: Mema Enterprises LLC dba Citgo 1914 State Rd.
COPIES TO: Chief Shawn Kudron

Mema Enterprises LLC, operating as Citgo and located within the City of La Crosse, currently holds alcohol and tobacco-related licenses issued by the City of La Crosse. Based upon repeated law enforcement contacts, regulatory violations, unlawful activity occurring within the establishment, and concerns regarding the qualifications of the license holder, the La Crosse Police Department recommends non-renewal of the establishment's licenses.

Lack of Qualifications to Hold License

Mema Enterprises LLC member and agent, Inderyas Chiraghadin, currently has a pending criminal matter in La Crosse County Circuit Court involving a Class H felony charge related to the possession and delivery of prescription medication.

The pending criminal matter substantially relates to the licensed activity and raises concerns regarding the qualifications necessary to continue holding alcohol and tobacco-related licenses within the City of La Crosse.

Alcohol Compliance Violations

On September 4, 2025, the La Crosse Police Department conducted an alcohol compliance check at the establishment.

During the compliance check, employee Muhammad Tariq sold alcohol to an underage individual in violation of Municipal Code Section 4-6 – Sale/Furnish Liquor to Underage.

Municipal Court records indicate the citation resulted in a conviction on October 10, 2025. This incident demonstrated a failure to properly verify identification and comply with municipal alcohol regulations designed to prevent underage alcohol sales.

Unlawful Prescription Medication and Regulatory Concerns

On November 17, 2025, the La Crosse Police Department, in conjunction with the Wisconsin Department of Revenue, conducted a compliance inspection at the establishment reference La Crosse Police Department case number 25-51921.

During the inspection, officers located approximately 175 Malegra (sildenafil) 200mg tablets concealed beneath the sales counter. Sildenafil, commonly known as Viagra, is only legally available within the United States by prescription. An employee informed officers the pills were being sold to customers for approximately \$7 per tablet. Officers advised staff that the sale of the pills was unlawful and seized the medication.

In addition to the unlawful prescription medication, officers observed several concerning items commonly associated with illegal drug activity and substance abuse, including:

- Numerous glass pipes commonly associated with illegal drug consumption.
- Several large “Exotic Whip” Nitrous Oxide containers and thousands of flavored nitrous oxide canisters commonly referred to as “whippets.”
- Mushroom products and THC Delta-8 or THC-A products intended to produce psychoactive effects.

As a result of the investigation, Chiraghdin was arrested and later released on a signature bond for delivery of prescription medication.

Officers also observed the establishment’s alcohol purchase invoices were not organized or maintained in the manner required by state law and regulatory standards.

Continued Unlawful Activity After Law Enforcement Intervention

On February 4, 2026, the La Crosse Police Department conducted a follow-up compliance inspection at the establishment reference La Crosse Police Case number 26-04730.

During the inspection, officers again located sildenafil 200mg tablets (22) behind the sales counter hidden in a cigar box underneath some other items. This marked the second occasion officers discovered illegal prescription medication being stored and sold from the establishment.

Officers also recovered portions of the original packaging clearly labeled “available by prescription only.” During contact with officers, Inderyas Chiraghdin acknowledged the intended purpose of the pills and stated, “they are for sex.” During this conversation he also referenced he already sells “Rhino” pills, an unregulated over the counter male sexual enhancement supplement which were displayed for sale at the check out area in plain view at eye level.

As a result of the investigation, Chiraghdin was arrested and later released on a signature bond for delivery of prescription medication.

The investigation further revealed the sildenafil pills were not commercially approved for distribution within the United States and that the 200mg dosage exceeded prescription dosages legally available within the United States.

During the same inspection, officers also discovered the establishment failed to display required signage related to hemp-derived cannabinoid inventory. Mema Enterprises LLC was cited for Failure to Post Signage – Hemp-Derived Cannabinoids in violation of Municipal Code Section 32-165. Municipal Court records indicate the citation resulted in a conviction on February 26, 2026.

False or Misleading Application Information

Municipal Code Sections 4-72(b)(6) and 4-142(b)(6) governing applications for intoxicating liquor and fermented malt beverage licenses provide:

“Any false statement contained in such application shall automatically nullify any license issued pursuant thereto.”

The 2026 renewal applications submitted by Mema Enterprises LLC failed to disclose the Municipal Code Section 32-165 conviction against the establishment.

Additionally, the renewal application acknowledged the pending felony matter but included the following statement:

“A vendor sold me an erectile product which, unknown to me, might or might not contain a prescription medication for erectile dysfunction.”

This statement directly contradicted statements made by Inderyas Chiraghdin during the February 4, 2026 inspection. During law enforcement contact, Chiraghdin acknowledged the nature and intended use of the pills.

Further investigation revealed the individual referenced as the alleged “vendor” was not a vendor associated with the business. The individual in question denied during an interview of providing any medications to Chiraghdin. Investigators also confirmed the individual has a history of illegal drug activity and criminal charges within the City of La Crosse.

The inconsistencies between the renewal application and statements made during the investigation raise concerns regarding the accuracy and truthfulness of the submitted application materials.

Crime Stoppers Tips and Community Reputation

The La Crosse Police Department has received Crime Stoppers tips and community information regarding unlawful activity occurring at the establishment.

On July 4, 2025, the department received Crime Stoppers Tip #459-C8910 alleging an employee was routinely selling alcohol to underage individuals without checking identification and attempting to meet minors after work hours. The tip indicated this behavior had allegedly been occurring for several years.

Additionally, over the past several years, the establishment has developed a reputation within the community as a location where minors can easily obtain alcohol or tobacco products. Several School Resource Officers have communicated concerns and information received from students regarding the ease of obtaining these products from the establishment.

The establishment has also become known within the community as a location where items associated with unlawful drug activity can be obtained. In previous years, the La Crosse Police Department became aware of “brown bag specials” sold by the establishment containing combinations of items commonly associated with illegal drug use. Although the individual items were legal to possess, the manner in which they were packaged and marketed raised concerns regarding their intended use.

Conclusion

Based upon my training, experience, and review of enforcement activity involving the establishment, Mema Enterprises LLC has demonstrated an ongoing pattern of unlawful activity, regulatory noncompliance, and conduct inconsistent with the responsibilities required of a licensed establishment within the City of La Crosse.

The continued sale and possession of unlawful prescription medication, failure to comply with alcohol regulations, misleading application information, and ongoing community concerns present significant public safety and regulatory concerns. Additionally, the pending felony criminal matter involving the license agent substantially relates to the licensed activity and calls into question the qualifications necessary to continue holding these licenses.

For these reasons, the La Crosse Police Department recommends non-renewal of the licenses held by Mema Enterprises LLC.