

ETHAN PURKAPILE
LA CROSSE POLICE DEPARTMENT
400 La Crosse St
La Crosse, WI 54601

Complainant,

vs.

Revocation of “Class B”
Combination Beer and
Liquor License

LATINO BAR AND GRILL, LLC
d/b/a LATINO BAR AND GRILL
Marissa Acosta Perez, Agent
115 5th Avenue South
La Crosse, WI 54601,

Respondent.

COMPLAINT OF ETHAN PURKAPILE

NOW COMES Ethan Purkapile, Sergeant for the City of La Crosse Police Department, and, pursuant to Wisconsin Statute § 125.12(2)(ag), alleges the following:

1. That the Complainant, Sgt. Ethan Purkapile, is an adult resident of the City of La Crosse with a business address of 400 La Crosse Street, La Crosse, Wisconsin, and at all times material to this action, he was and is a member of the La Crosse Police Department, in his official capacity.
2. That the Respondent herein, Latino Bar and Grill LLC, Marissa Acosta Perez, agent, is the alcohol beverage licensee doing business as Latino Bar and Grill (“Latino Bar”), located at 115 5th Avenue South, La Crosse, Wisconsin, according to documents filed with the La Crosse City Clerk.
3. That the La Crosse Common Council initially granted the respondent a “Class B” Combination Beer and Liquor license on February 10, 2022. This license was renewed in

2023 and 2024, for the period of July 1, 2024, through June 30, 2025. At all times alleged in this Complaint, Respondent was the holder of a “Class B” Combination Beer and Liquor License issued by the City of La Crosse.

4. That upon information and belief, the licensee, under the City of La Crosse “Class B” Combination Beer and Liquor License for the retail sale of alcohol beverages at the premises known as Latino Bar and Grill, 115 5th Avenue South, La Crosse Wisconsin, has violated and continues to violate various portions of Wisconsin State Statute Chapter 125 and La Crosse Municipal Code, as set forth in La Crosse Police Department records and reports, University of Wisconsin La-Crosse letters and reports, and records from the City of La Crosse Clerk’s Office, which are incorporated into this complaint by reference in their entirety.
5. That the disorderly and illegal use of the establishment is interfering with public health and safety and is grounds for revocation or suspension of “Class B” Combination Beer and Liquor License under Wis. Stat. § 125.12(2)(ag)1 for violations of Wisconsin alcohol beverage law and local ordinances, Wis. Stat. § 125.12(2)(ag)2 for keeping or maintaining a disorderly or riotous, indecent or improper house, and Wis. Stat. § 125.12(2)(ag)4 for failing to possess the qualifications required to hold the license.
6. That the violations include, but are not limited to:
 - a. Selling alcohol to underage persons, failing to take action to prevent illegal consumption of alcohol by underage persons, and encouraging or contributing to underage presence and underage drinking in the establishment, in violation of La Crosse Municipal Code Sections 4-6 and Wis. Stat. § 125.07(1)(a).

- b. Allowing the presence of underage persons in the establishment in violation of La Crosse Municipal Code Section 4-7 and Wis Stat. § 125.07(3).
- c. Preventing, resisting, or interfering with La Crosse Police Officers entering the premises or carrying out their official duties in violation of La Crosse Municipal Code Section 4-3.
- d. Maintaining a disorderly house by facilitating underage drinking and overserving, leading to disorder in the community including: complaints about vomit, public urination, and garbage, property damage, alcohol poisoning, and more, in violation of Wis. Stat. § 125.12(2)(ag)2. See *City of Cudahy v. DeLuca*, 49 Wis. 2d 90, 93-94, 181 N.W.2d 374 (1970) (“A house the inmates of which behave so badly as to become a nuisance to the neighborhood is esteemed, at common law, a disorderly house, and so of one which is kept in such a way as to disturb or scandalize the public generally, or the inhabitants of a particular neighborhood, or the passers-by. And it seems that a complaint for keeping such a house may be maintained by proof that only one person in the neighborhood or community was disturbed or annoyed, if the acts done were of such a nature as tended to annoy all good citizens.”)
- e. Qualifying as a Chronic Nuisance Premises and failing to adhere to terms of said abatement plan in violation of La Crosse Municipal Code Chapter 30.
- f. Failing to meet agent residency requirements in violation of La Crosse Municipal Code Section 4-75 and Wis. Stat. § 125.10.
- g. Attesting to false information on alcohol beverage license application documents in violation of La Crosse Municipal Code Section 4-72 and Wis. Stat. § 125.04(6)(a)1.

h. Failing to adhere to building capacity limits in violation of La Crosse Municipal Code Section 18-64.

7. That any license issued in violation of Ch 125 is void. Wis. Stat. § 125.04(2).

8. That the unreasonable activities associated with the establishment put a significant strain on public resources and negatively impact public health, welfare, and safety.

NOW, THEREFORE, for all the above stated reasons and pursuant to Wisconsin Statute § 125.12 and La Crosse Municipal Code Section 4-82, the Complainant requests that the La Crosse Common Council REVOKE the “Class B” Combination Beer and Liquor License for the premises known as Latino Bar and Grill, 115 5th Avenue South, La Crosse Wisconsin.

Signature Page to Follow


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

Sergeant Ethan Purkapile of the La Crosse Police Department, being duly sworn on oath, states that he has read the foregoing Complaint against Latino Bar and Grill, LLC, d/b/a Latino Bar and Grill, 115 5th Avenue South, La Crosse, Wisconsin, and that the statement are true of his own knowledge, except those which are stated upon information and belief, and as to such matters, he believes them to be true as they are based on records prepared by individuals pursuant to their official duties, are affidavits signed under penalty of perjury, or are records from the City of La Crosse.



Sergeant Ethan Purkapile
La Crosse Police Department

Subscribed and sworn to before me
this 7th day of February 2025.


Ellen R. Atterbury, Notary, State of Wisconsin
My Commission is permanent

