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9 November 2025
10:49:15
GD-25-011059

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY

PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA
EX REL STEPHEN A. ZAPPALA, JR.
DISTRICT ATTORNEY OF ALLEGHENY
COUNTY

Plaintiff,

vs.

CIVIL DIVISION

NO: GD – 25-11059

MJKKS LLC, OWNER
CHARLESETTA BROWN, OWNER
DBA LINX ON CARSON
JOHN & DEBORAH CATANESE, LANDLORD
1713 E CARSON STREET
PITTSBURGH, PA 15203

CODE: 020-EQUITY

Defendant.

COMPLAINT IN EQUITY,
PETITION FOR PRELIMINARY
INJUNCTION

Filed on behalf of the Commonwealth.

STEPHEN A. ZAPPALA, JR.
DISTRICT ATTORNEY of
ALLEGHENY COUNTY
PA I.D. #41254

BY
KEVIN F. McCARTHY
Assistant District Attorney
PA I.D. No. 47254
Allegheny County Courthouse
436 Grant St
Pittsburgh, PA 15219

412-350-4400

Certificate of Location
I hereby certify that the location of the real estate is:
Pittsburgh — 17th
City, Boro or Township — Ward
Block/Lot: 42-E-710 Tiebreaker
Address: 1713 E. Carson Street
By: Kevin F. McCarthy

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA EX REL: STEPHEN A. ZAPPALA, JR., DISTRICT ATTORNEY OF ALLEGHENY COUNTY	CIVIL DIVISION
Plaintiff,	NO. GD
V.	
MJKKS LLC, OWNER CHARLESETTA BROWN, OWNER DBA LINX ON CARSON JOHN & DEBORAH CATANESE, LANDLORD 1713 E CARSON STREET PITTSBURGH, PA 15203	
Defendants.	

COMPLAINT IN EQUITY
AND PETITION FOR PERMINENT INJUNCTION

NOTICE TO DEFEND

YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE ACTION WITHIN TWENTY (20) DAYS AFTER THIS COMPLAINT AND NOTICE ARE SERVED, BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE CASE MAY PROCEED WITHOUT YOU AND A JUDGMENT ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR ANY MONEY CLAIMED IN THE COMPLAINT OR FOR ANY OTHER CLAIM OR RELIEF REQUESTED BY THE PLAINTIFF. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU. YOU SHOULD TAKE THIS TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

LAWYER REFERRAL SERVICE
THE ALLEGHENY COUNTY BAR ASSOCIATION
436 Seventh Avenue, Fourth Floor
Pittsburgh, Pennsylvania 15219
Telephone: 412-261-5555

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY

PENNSYLVANIA

COMPLAINT IN EQUITY

NOW COMES the Commonwealth of Pennsylvania by STEPHEN A. ZAPPALA, JR., District Attorney, and Kevin McCarthy, Assistant District Attorney, and brings this complaint in equity pursuant to 47 P.S. § 6-611 and respectfully requests this Honorable Court to permanently enjoin the operation of MJKKS LLC DBA LINX ON CARSON , a licensed facility located at 1713 East Carson Street, Pittsburgh, PA 15203, as a common nuisance and in support of the request for a permanent injunction respectfully represents as follows:

1. That the plaintiff is the Commonwealth of Pennsylvania acting by and through its statutorily authorized representative, STEPHEN A. ZAPPALA, JR., District Attorney of Allegheny County, (hereinafter "Commonwealth").

2. That the Commonwealth is proceeding pursuant to 47 P.S.§ 1-101 et seq., 47 P.S.§ 4-491(1), 4-492(2), 4-493(3), 47 P.S. § 6-611, and the common law requests a hearing for an injunction to have Linx On Carson permanently enjoined from operation pursuant to 47 P.S § 6-611 and the common law and the Commonwealth requests a hearing to be set within twenty days of the issuance of this filing.

3. That Linx On Carson, 1713 East Carson Street, Pittsburgh, PA 15203, is located within the County of Allegheny.

4. That the owners of the building in which Linx on Carson is located and transacting business are John Catanese and Deborah Catanese. (Records from the Allegheny County Real Estate portal are attached hereto, incorporated herein and marked as Commonwealth Exhibit 1). The tenant of the building is Charlesetta Brown who is the owner/operator of Linx on Carson.

5. That beginning in October 2023, Linx on Carson began to operate at 1713 East Carson Street, Pittsburgh, PA 15203, and has been selling and/or providing alcohol with License #115028. (Board Attestation/Certification of Official records from the Pennsylvania Liquor Control Board is attached hereto, incorporated herein and marked as Commonwealth Exhibit 2).

6. The conduct of the business, its owners, employees, patrons and others attracted to the neighborhood by the business involves criminal activity including fights, aggravated assaults, disorderly conduct, public drunkenness and narcotics usage, all of which are contrary to the laws of the Commonwealth of Pennsylvania.

7. The owners of the business, their employees, and their patrons are responsible for violence, often involving fighting and other boisterous conduct inside and outside the business and in the immediate vicinity surrounding the business.

8. That in a period of time from December 29, 2024, through November 2, 2026, the Pittsburgh Police Department and other law enforcement agencies have responded to approximately twenty-eight incidents at Linx On Carson. These incidents all involve violence and disorderly and obscene conduct. The incidents are briefly summarized as

follows: (Reports by The Pittsburgh Police are attached hereto, incorporated herein and marked as Commonwealth Exhibit 3).

1. **November 2, 2026, 0025 hrs.-** A fight started inside of the bar between patrons and continued outside. Police broke up the fight and arrested three people.

2. **October 19, 2026, 0050 hrs.-** Police observed a male patron being disorderly inside of the bar and informed security guards there may be an issue. The patron exited and then urinated on the building next door. Police approached this male and asked for his ID which he said that he did not have on him. He was asked how he got into the bar and he said he paid the bouncer to get in. One of the guards admitted to letting him in without an ID because he knew him, which is a violation of the Conditional Licensing Agreement that they have with the PLCB. The patron was issued a citation.

3. **9/28/26 0140 hrs.-** Police observed a fight between 10-12 patrons. Security was removing patrons and pushing them into the street. Police were trying to control the situation but security for the bar kept interfering by being aggressive with patrons. Multiple patrons were issued citations.

4. **9/28/26-** A patron that was involved in the above referenced report was being detained and asked for identification which she said that she did not have on her. When asked how she got into the bar, she said that they did not ask her for her ID, which is a violation of the Conditional Licensing Agreement that they have with the PLCB. Search incident to arrest produced an expired driver's license hidden in her bra. The patron was transported to jail.

5. **9/28/26-** While on the scene of the above referenced report, a male was fighting with staff trying to get back into the bar. He said that he was going to beat everyone up that was inside. After he was detained, he told Police that he worked there and needed to get back inside. He was issued a citation.

6. **9/21/26, 0130 hrs.-** A female standing in front of the bar was punched in the face by another female. A summons was sent in the mail.

7. **9/17/26 0136 hrs.-** Police called to the bar for a fight inside. They approached and found a female in handcuffs in the back of the bar. The crowd was being aggressive, so they took this female outside to determine what had happened. Another female was being aggressive towards Police, and she was detained as well. A citation was issued.

8. **9/14/26 0059 hrs.-** Police observe a female striking another female. She ignored commands by the Police to stop but did not. She was issued a non-traffic citation.

9. **8/17/26 0202 hrs.-** Verbal altercation between patrons outside of the bar resulted in three separate altercations that Police, assisted bar security, broke up. The crowd was pepper sprayed by Police.

10. **7/27/26 0207 hrs.-** Police observed four females fighting outside of the bar. They were able to separate them, and it was determined that they had started fighting inside of the bar and the fight continued outside. All were intoxicated and two sustained injuries that required medical attention. Two of the patrons were taken to jail.

11. **7/4/26 2049 hrs.-** Police assisted bar security with unruly intoxicated patrons they were trying to remove from the bar. One of the patrons resisted Police and was taken to jail.

12. **6/22/26 0108 hrs.-** Police called for a male being disruptive in the alley behind the bar, kicking cars and being loud. He was trying to re-enter the bar to fight with someone inside. Police arrested this male.

13. **6/1/26-** Pittsburgh Police issue a citation for a male standing in front of the bar with marijuana.

14. **4/13/26 0316 hrs.-** Police were called to investigate a fight that involved security guards for the bar with another male in the street after the bar had closed. One male was cited for disorderly conduct.

15. **3/9/26 0132 hrs.-** Police respond to a fight outside of the bar and observe a female striking another female. She tried to get back inside of the bar with her friends and Police arrested her.

16. **2/9/26 0337 hrs.-** An employee from the bar claimed to police that he had been robbed. After a brief investigation, it was discovered that this was a false report and he had not been robbed. He also told Police that there may be a gun in the car and he is a person not to possess. He was arrested.

17. **12/1/25 0205 hrs.-** Police observe a female standing outside the back door of the bar bleeding. She stated that she was assaulted inside of the bar. Police are advised that this female was also handled roughly by a security guard for the bar after fighting with the guard. She fell to the ground and the guard walked away and went

inside the bar. She did not have identification on her and the bar was unable to find her information in the ID scanner.

18. **12/1/25 0015 hrs**.- Police observed a male walking toward the bar threatening to hurt someone in front of the bar. He starts to fight with another male and they are separated by Police. Citations were issued.

19. **11/2/25, 0101 hrs.-** Police observe a patron with an open container of alcohol while waiting in line to enter the bar. He was issued a citation.

20. **11/2/25, 0050 hrs.**- Police approach a male standing in front of the bar smoking marijuana. He was issued a citation.

21. **11/2/25, 0038 hrs.-** Police observe a female patron smoking marijuana while waiting in line to enter the bar. She was issued a citation.

22. **10/12/25 0130 hrs**.- Police alerted that there were two people fighting outside of the bar. They were separated and issued citations.

23. **10/5/25**- Police observed a male in front of the bar with marijuana. He was issued a citation.

24. **9/22/25 0152 hrs**.- Police observed a female with marijuana standing in front of the bar. She was issued a citation.

25. **9/1/25 0115 hrs**.- A female patron was punched in the face by a male patron. Bar security said that they did not see the assault but that they were trying to remove her from the bar for being intoxicated and disorderly. She became combative with Police and was arrested.

26. **6/14/25 0315 hrs.-** Police called for a noise complaint and found that the bar was still open. The manager told them that there was a party for a football player and would end soon. Another Officer observed on camera that the party was still ongoing, and people were using the rear entrance to enter the bar at 0350 hours.

27. **4/28/25 0139 hrs.**- A male was fighting with others in front of the bar and was issued a citation.

28. **12/29/24 0223 hrs.**- Police called to the bar for a report of a fight. As they were dispersing the crowd two men became disorderly and a female stated that they had attacked her. Both men were searched and marijuana was found on them. They were both arrested.

9. That from January 10, 2025, through October 18, 2026, the Bureau of Liquor Control Enforcement conducted investigations at Linx on Carson. These investigations have resulted in the following (Reports are attached hereto, incorporated herein and marked as Commonwealth Exhibit 4):

a) A warning letter in regard to the failure to keep records on the licensed premises. (January 10, 2025)
b) A warning letter in regard to unlawful discrimination. (July 20, 2025)
c) A notice of violation letter and citations in regard to: Sold, furnished or gave liquor for consumption off premises (June 14, 2025), Failed to require patrons to vacate (June 14, 2025) Permitted patrons to enter after hours when they did not have an extended hours permit (June 14, 2025) and Unlawful discrimination (July 20, 2025).
d) A notice of violation letter in regard to: Loud speaker violation (July 20, 2026), Noisy and Disorderly operation (December 1, 2025, March 9, 2026, June 22, 2026, July 12, 2026, July 27, 2026, August 10, 2026, August 17, 2026, September 28, 2026), Failure to adhere to conditions of their CLA (September 14, 2026, October 7, 2026, and October 18, 2026)

10. The Pennsylvania Liquor Control Board entered into a Conditional Licensing Agreement with Linx on Carson in which they have been found to be in violation of this agreement. (Board Attestation and a copy of the Conditional Licensing Agreement are attached hereto, incorporated herein and marked as Commonwealth Exhibit 5)

11. The conduct of the business, its owners, employees and patrons inside the business and others attracted to the neighborhood by the business are a continuous and persistent disruption of the peace and good order of the neighborhood surrounding the business.

12. The conduct of the business, its owners, employees, and patrons have and will continue to cause local businesses and residents to be disturbed.

13. The conduct of the bar, its owners, employees, and patrons have and will continue to force residents in the immediate vicinity surrounding the bar to live in fear and danger.

14. The Nuisance Bar Task Force, which consists of Pittsburgh Police, Liquor Control Enforcement, Allegheny County District Attorney Investigations Unit, Allegheny County Health Department, Pittsburgh Bureau of Fire and the Department of Permits, Licenses and Inspections have been required to expend disproportionate amounts of resources to investigate the criminal conduct and nuisance behavior described above. The Nuisance Bar Task Force has had to meet with Linx on Carson three times to express its concerns about how the business is being operated.

15. The Commonwealth, the residents of the area, as well as the visitors to the area, the businesses and police are suffering and will continue to suffer immediate and irreparable harm which cannot be compensated by damages. A letter from Commander Devine, Commander of Zone 3, in which Linx on Carson is located in, has expressed his desire for the bar to cease operations because of the danger it presents to the community. (The letter from Commander Devine is attached hereto, incorporated herein and marked as Commonwealth Exhibit 6).

16. It is apparent that the business cannot and will not control the patrons and the people attracted to the vicinity of the business.

17. Greater harm would result by refusing to grant the injunction than by granting the injunction.

18. An injunction would restore the area to the status it enjoyed before Linx on Carson disturbed the peace and good order thereof.

19. The Commonwealth has no adequate remedies at law for this problem.

WHEREFORE, the Commonwealth of Pennsylvania, on relation and Information of STEPHEN A. ZAPPALA, JR., District Attorney of Allegheny County, Pennsylvania, respectfully requests that this Honorable Court issue a decree ordering such common and public nuisance be abated, and restraining the defendant, Linx on Carson, its agents, servants, employees, successors, assigns, and anyone acting together or with or on behalf of them from occupying or using its leased premises for ONE year and ordering no liquor, alcohol or malt or brewed beverage be manufactured, sold, offered for sale, transported, bartered, or furnished or stored in bond, or store for hire in the licensed premises during the aforesaid period.

Respectfully submitted,

Kevin F. McCarthy
Assistant District Attorney
PA ID No. 47254
436 Grant Street
Pittsburgh, PA 15219

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA EX REL: STEPHEN A. ZAPPALA, JR., DISTRICT ATTORNEY OF ALLEGHENY COUNTY	CIVIL DIVISION
Plaintiff,	NO. GD
V.	
MJKKS LLC, OWNER CHARLESETTA BROWN, OWNER DBA LINX ON CARSON JOHN & DEBORAH CATANESE, LANDLORD 1713 E CARSON STREET PITTSBURGH, PA 15203	
Defendants.	

AFFIDAVIT

BEFORE ME, the undersigned authority, personally appeared, Kevin F. McCarthy, Assistant District Attorney, who being duly sworn according to law, deposes and says that the statement contained in the foregoing complaint and petition are true and correct to the best of his information, knowledge and belief.

Signed Kevin F. McCarthy

KEVIN F. MCCARTHY
Assistant District Attorney
Pa. I.D. No. 47254

SWORN TO and subscribed

Before me this 9th day

Of NOVEMBER ,2026

NOTARY PUBLIC

Laura V. Delaney

Commonwealth of Pennsylvania - Notary Seal
Laura V. Delaney, Notary Public
Allegheny County
My commission expires April 25, 2027
Commission number 1233072
Member, Pennsylvania Association of Notaries

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA EX REL: STEPHEN A. ZAPPALA, JR., DISTRICT ATTORNEY OF ALLEGHENY COUNTY	CIVIL DIVISION
Plaintiff,	NO. GD
V.	
MJKKS LLC, OWNER CHARLESETTA BROWN, OWNER DBA LINX ON CARSON JOHN & DEBORAH CATANESE, LANDLORD 1713 E CARSON STREET PITTSBURGH, PA 15203	
Defendants.	

FINAL DECREE OF COURT AND INJUNCTION

AND NOW, to wit, this _____day of _____2026, upon presentation of the within Petition and consideration of the Complaint in Equity filed contemporaneously herewith, it is hereby DECREED that a PERMANENT INJUCTION shall issue for a period of one (1) year from this date, pursuant to this Court's finding of a nuisance within the meaning of the Liquor Code's 47 P.S. § 6-611 and the common law The defendants, MJKKS LLC., CHARLESETTA BROWN, owner DBA LINX ON CARSON and JOHN CATANESE AND DEBORAH CATANESE, owners of 1713 E CARSON STREET, PITTSBURGH, PA 15203, and landlords of the premises are hereby enjoined from conducting or permitting any further business of any kind and enjoined from selling, offering for sale, bartering, furnishing or storing any liquor, alcohol or malt or brewed beverage, and enjoined from removing or in any way interfering with the liquids, beverages, and other things used at MJKKS LLC., CHARLESETTA BROWN, owner DBA LINX ON CARSON and JOHN CATANESE AND DEBORAH CATANESE, landlord, 1713 E CARSON STREET, PITTSBURGH, PA 15203, or otherwise opening or operating MJKKS LLC, DBA LINX ON CARSON in Allegheny County, Pennsylvania for a period of at least one (1) year. The Sheriff of Allegheny County shall serve a copy of this Order of Court upon the Defendants. The Sheriff of Allegheny County is hereby ordered to secure the premises from entry by any person except upon order of this court. This injunction may be enforced by the Sheriff of Allegheny County or any other municipal police officer having jurisdiction over the property.

BY_____, J.

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA EX REL: STEPHEN A. ZAPPALA, JR., DISTRICT ATTORNEY OF ALLEGHENY COUNTY	CIVIL DIVISION
Plaintiff,	NO. GD
V.	
MJKKS LLC, OWNER CHARLESETTA BROWN, OWNER DBA LINX ON CARSON JOHN & DEBORAH CATANESE, LANDLORD 1713 E CARSON STREET PITTSBURGH, PA 15203	
Defendants.	

CERTIFICATE OF SERVICE

1. I certify that on Nov 9, 2026, a copy of this Complaint in Equity and Petition for Temporary Injunction was delivered to the following persons:

Service by hand delivery
addressed as follows:

Charlesetta Brown- 6112 Deer Park Dr, Reisterstown, MD 21136
John and Deborah Catanese- 5816 Howe St., Pgh., PA 15232
Charles Caputo- 204 5th Ave. 5th Floor, Pgh., PA 15222

Kevin F. McCarthy
Assistant District Attorney
PA ID No. 47254

Office of the District Attorney of Allegheny County
401 Courthouse
Pittsburgh, PA 1521
(412) 350-4377

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Kevin F. McCarthy

Signature: Kevin F. McCarthy

PA Attorney I.D. No.: 47254

Supreme Court of Pennsylvania

Court of Common Pleas
Civil Cover Sheet

_____ **County**

For Prothonotary Use Only:	
Docket No:	

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

SECTION A

Commencement of Action:
☑ Complaint ☐ Writ of Summons ☐ Petition
☐ Transfer from Another Jurisdiction ☐ Declaration of Taking

Lead Plaintiff's Name: Com of PA by Stephen A Zappala, Jr.	Lead Defendant's Name:
Are money damages requested? ☐ Yes ☑ No	Dollar Amount Requested: (check one) ☐ within arbitration limits ☐ outside arbitration limits
Is this a *Class Action Suit*? ☐ Yes ☑ No	**Is this an *MDJ Appeal*?** ☐ Yes ☐ No

Name of Plaintiff/Appellant's Attorney: Kevin F McCarthy PA Id No. 47254

☐ **Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)**

SECTION B

Nature of the Case: Place an "X" to the left of the **ONE** case category that most accurately describes your ***PRIMARY CASE.*** If you are making more than one type of claim, check the one that you consider most important.

TORT *(do not include Mass Tort)*
- ☐ Intentional
- ☐ Malicious Prosecution
- ☐ Motor Vehicle
- ☐ Nuisance
- ☐ Premises Liability
- ☐ Product Liability *(does not include mass tort)*
- ☐ Slander/Libel/ Defamation
- ☐ Other: _____

MASS TORT
- ☐ Asbestos
- ☐ Tobacco
- ☐ Toxic Tort - DES
- ☐ Toxic Tort - Implant
- ☐ Toxic Waste
- ☐ Other: _____

PROFESSIONAL LIABLITY
- ☐ Dental
- ☐ Legal
- ☐ Medical
- ☐ Other Professional: _____

CONTRACT *(do not include Judgments)*
- ☐ Buyer Plaintiff
- ☐ Debt Collection: Credit Card
- ☐ Debt Collection: Other _____
- ☐ Employment Dispute: Discrimination
- ☐ Employment Dispute: Other _____
- ☐ Other: _____

REAL PROPERTY
- ☐ Ejectment
- ☐ Eminent Domain/Condemnation
- ☐ Ground Rent
- ☐ Landlord/Tenant Dispute
- ☐ Mortgage Foreclosure: Residential
- ☐ Mortgage Foreclosure: Commercial
- ☐ Partition
- ☐ Quiet Title
- ☐ Other: _____

CIVIL APPEALS
Administrative Agencies
- ☐ Board of Assessment
- ☐ Board of Elections
- ☐ Dept. of Transportation
- ☐ Statutory Appeal: Other _____
- ☐ Zoning Board
- ☐ Other: _____

MISCELLANEOUS
- ☐ Common Law/Statutory Arbitration
- ☐ Declaratory Judgment
- ☐ Mandamus
- ☐ Non-Domestic Relations Restraining Order
- ☐ Quo Warranto
- ☐ Replevin
- ☑ Other: Equity

Updated 1/1/2011