



5. That on October 13, 2014, Guillermo approached Mary Huot and asked her to clean the Drunken Duck for some extra cash.
6. That Huot went to the Drunken Duck to clean; and while she was cleaning, Guillermo put his finger in the neck of her shirt, pulled it out, and looked down her shirt. Guillermo said, "Those are nice," and then pulled up the right side of Huot's shirt, exposing her breasts in a bra, without her consent. Huot quickly pulled her shirt down and turned to walk away. Guillermo then grabbed her by the hips from behind, turned her around, and tried to "French kiss" her, without her consent. Huot told Guillermo to stop and continued to clean the bar. Guillermo stated, "If you take care of me, I will take care of you," which Huot interpreted as Guillermo suggesting to pay her for sexual favors. Huot told Guillermo "no"; however, Guillermo continued to tell her that he would "take care of her." Huot eventually grew so uncomfortable that she left the Drunken Duck and later called the West Allis Police Department to report the incident.
7. That due to Huot's complaint, West Allis Police Detective Tom Kulinski became aware of other similar incidents involving Guillermo and began an investigation.
8. Detective Kulinski's investigation revealed that Guillermo also had unwanted sexual contact with Simone Mervosh. Mervosh, who had worked as a bartender for the Drunken Duck for approximately 2 ½ years, told Detective Kulinski that while she was working, Guillermo would follow her down to the basement of the tavern, get very close to her, back her into a wall, and tell her how much he liked her. Mervosh stated that she would have to physically push him away from her to escape and eventually stopped going to the basement altogether. Further, Mervosh stated that when she worked behind the bar, Guillermo would walk past her and touch her buttocks each time, without her consent. Mervosh reported that Guillermo grabbed her well over 50 times and that each time she told him to stop, but that he never did.

On one occasion, Mervosh's son, Chance, observed Guillermo grab his mother's buttocks. Mervosh quit working at the Drunken Duck in November 2013 due to Guillermo's sexual harassment.

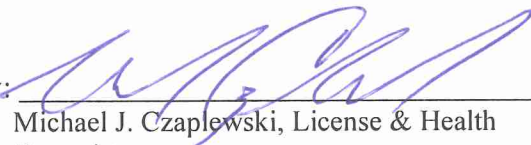
9. That Detective Kulinski also spoke to Kimberly Krueger, who cleaned the Drunken Duck for approximately 1 ½ months. Krueger stated that Guillermo assaulted her one day in the basement where he grabbed her buttocks and asked her if they could do something – which Krueger stated that he meant to do something sexual with her. Krueger told Guillermo to stop and that she was married; however, when they returned upstairs, Guillermo attempted to grab her breasts with his hands. Krueger was successful in knocking his hands away. Subsequently, on another occasion, Guillermo attempted to grab her breasts in front of patrons, without Krueger's consent. Due to Guillermo's harassment, Krueger quit the cleaning job at the Drunken Duck.
10. That Detective Kulinski interviewed Melissa Bucklew, who had previously worked at the Drunken Duck. Bucklew stated that Guillermo had "smacked" her on the buttocks in front of her boyfriend, Dan, and attempted to grab her breasts several times without her consent. Guillermo was only able to touch Bucklew's breasts once due to Bucklew usually being able to grab his hands and tell him "no." However, Bucklew had to fall onto the floor in a fetal position two or three times to thwart Guillermo's advances. Bucklew additionally reported that Guillermo attempted to kiss her, grab her buttocks, and grab her underwear. On at least two occasions, Guillermo placed his hands down her pants in the front and rear without Bucklew's consent; due to Bucklew's stopping him, Guillermo was never able to reach her genital area. At one point, Guillermo came up behind her, attempted to grab her; and when she stopped him, he said that he would "take care of her." Guillermo's conduct stopped when Bucklew's boyfriend confronted Guillermo about the incidents.
11. That on November 14, 2014, the Milwaukee County District Attorney's Office

charged Guillermo with three counts of 4<sup>th</sup>-degree sexual assault and one count of false imprisonment for the aforementioned incidents.

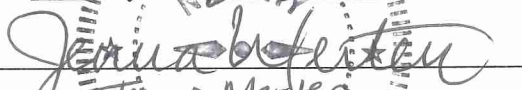
12. That the conduct of Hector Guillermo occurred during his employment at the Drunken Duck and substantially relates to the alcohol beverage licensed activity contrary to Wis. Stat. § 125.04(5)(b), so as to disqualify Hector Guillermo from obtaining, keeping, or renewing a Class "I" Operator's License.

**WHEREFORE**, Michael J. Czaplewski requests that Hector Guillermo be summoned to appear before the License and Health Committee of the West Allis Common Council to answer this complaint and, if the material allegations of the complaint are denied, that a hearing be held to determine whether the Operator's License issued to Hector Guillermo should be suspended, revoked or not renewed.

Dated at this 29 day of December, 2014.

By:   
Michael J. Czaplewski, License & Health  
Committee  
West Allis Common Council

Subscribed and sworn to before me  
this 29<sup>th</sup> day of December, 2014.

  
( Jenna Merte )  
Notary Public, State of Wisconsin  
My Commission Expires: Permanent

