

**WEST ALLIS COMMON COUNCIL
PUBLIC SAFETY COMMITTEE
CITY OF WEST ALLIS**

**In the Matter of the
Complaint Against**

**Amy Thompson (Sole Proprietor)
D/B/A Bug N Out**

**Premises Location:
5630 W. Lincoln Avenue
West Allis, WI 53214**

AMENDED STIPULATION FOR RESOLUTION OF COMPLAINT

Amy Thompson, sole proprietor, D/B/A Bug N Out, represented by Attorney Vince Bobot and Attorney Michael Maistelman, hereby conditionally agrees to the following: (1) waiver of the right to an evidentiary hearing on the merits of the complaint, thereby allowing the West Allis Common Council to find the merits of complaint to be true and (2) suspension of the entertainment and liquor licenses for Bug N Out for 90 consecutive days, starting on Wednesday, April 19, 2023 at 12:00 PM and running through Tuesday, July 18, 2023 at 12:00 PM. This stipulation is premised upon the agreement that the suspension period partially runs into the 2023-2024 license period and Amy Thompson agrees to still honor the full suspension period through July, 18, 2023 at 12:00 PM. Amy Thompson further stipulates that if the suspension is confirmed by the West Allis Common Council, Bug N Out will be fully closed for the duration of the suspension period.

This stipulation is offered by Amy Thompson, D/B/A Bug N Out, by Attorney Vince Bobot and Attorney Michael Maistelman, based on the following considerations:

- 1) the impact this incident has had on the families, surrounding community, and City of West Allis;
- 2) that if this stipulation is accepted by the Common Council, Amy Thompson, D/B/A Bug N Out waives the right to appeal this stipulated outcome, which brings certainty to the outcome of this complaint and avoids the cost and delay caused by litigation;
- 3) the City's intent to effectuate proximate and effective specific and general deterrence; and
- 4) the following conditions of the license that the licensee has stipulated to and implemented, including:
 - a. three additional cameras installed to give better views of the 2nd floor, backyard, and fire exit door,
 - b. alarms on the fire door that will sound in the lower-level bar,
 - c. the addition of a metal detector wand which will allow staff to scan individuals as necessary,
 - d. limiting the capacity of 2nd floor rentals to no more than 40 people.
 - e. removing the 2nd floor space from the licensed premises description (meaning alcohol cannot be served in that area of the establishment unless an extension of premises is applied for and approved by the West Allis Common Council), and

- f. an employee of the Bug N Out must be present in the upper hall area
for all events that occur in that upper portion of the establishment.

If the West Allis Common Council does not accept this stipulation, then Amy Thompson, sole proprietor, D/B/A Bug N Out, acknowledges that the matter shall be promptly scheduled for an evidentiary hearing on the merits of the complaint, and the Common Council may not consider this conditional stipulation as an admission of any of the facts alleged in the complaint.

Dated this 12 day of April 2023.

By: V. J. Bobot
Attorney Vincent Bobot
Attorney for Amy Thompson
Sole Proprietor/ Agent for Bug N Out