

**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**

STIPULATION FOR RESOLUTION OF COMPLAINT

Amy Thompson, D/B/A Bug N Out, represented by Attorney Vince Bobot and Attorney Michael Maistelman, hereby conditionally waives the right to an evidentiary hearing on the merits of the complaint dated March 2, 2023, and agrees to a suspension of 90 consecutive days, to start at the discretion of the West Allis Common Council.

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 remedial efforts immediately made by the licensee, including three additional cameras installed to give better views of the 2nd floor, backyard, and fire exit door, alarms on the fire door that will sound in the lower-level bar, the addition of a metal detector wand which will allow staff to scan individuals as necessary, and limiting the capacity of 2nd floor rentals to no more than 40 people.

If the West Allis Common Council does not accept this stipulation, then Amy Thompson, D/B/A Bug N Out acknowledge 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 22 day of March 2023.

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