
CITY OF MADISON,

Plaintiff,

COMPLAINT

vs.

A PLACE FOR FRIENDS BAR & GRILL, LLC
a Wisconsin limited liability company
dba A Place for Friends
1205 Sherman Avenue
Madison, WI 53704

Respondent.

NOW COMES the City of Madison by Steven C. Brist, Assistant City Attorney, and alleges as follows, that:

1. The complainant, Assistant City Attorney Steven C. Brist, is an adult resident of the City of Madison, with a business address of 210 Martin Luther King Jr. Blvd., Madison, Wisconsin, and at all times material to this action, he has been an Assistant City Attorney for the City of Madison.

2. The respondent herein, A Place for Friends Bar & Grill, LLC, Darius Wilson, Registered Agent, is the alcohol beverage licensee doing business as A Place for Friends, 2105 Sherman Avenue, Madison, Wisconsin, according to documents filed with the City Clerk of the City of Madison.

3. The Common Council of the City of Madison granted a Class B Combination Alcohol Beverage License to A Place for Friends Bar & Grill, LLC, dba A Place for Friends, for the premises located at 2105 Sherman Avenue, Madison, Wisconsin, for the period February 5, 2008 through June 30, 2008 and July 1, 2008 through June 30, 2009. At all times alleged in this

complaint, Respondent was the holder of a Class B Combination Alcohol Beverage License issued by the City of Madison.

On information and belief, the licensee, under a City of Madison Class B Combination Alcohol Beverage License for the retail sale of alcohol beverages, at the premises known as a Place for Friends, 2105 Sherman Avenue, Wisconsin, has violated various provisions of Sec. 38.10(1) of the Madison General Ordinances, as set forth in Madison Police Department Officers' Reports, to wit:

THE ABOVE-NAMED COMPLAINING WITNESS BEING DULY SWORN SAYS THAT THE ABOVE-NAMED DEFENDANT, by its agent, servant or employee, IN THE CITY OF MADISON, DANE COUNTY, WISCONSIN, on the dates indicated below at A Place for Friends, 2105 Sherman Avenue, Madison, Wisconsin, DID:

As licensee under a City of Madison Class B combination license for the retail sale of fermented malt beverages and intoxicating liquors at the premises known as A Place for Friends, 2105 Sherman Avenue, Madison, WI, by its agents, servants or employees, did:

I. VIOLATIONS OF MADISON GENERAL ORDINANCES SEC. 38.10(1)(A)2., KEEPS OR MAINTAINS A DISORDERLY, RIOTOUS, INDECENT OR IMPROPER HOUSE

O.R. NO. 08-50018

FIRST COUNT: Unlawfully violate a condition on an alcohol beverage license application or a condition on the license itself to wit: exceeded patron capacity, contrary to Sec. 38.12(1)(a), Madison General Ordinances, for which the violation is a forfeiture of not more than One Thousand Dollars (\$1000) plus 26% statutory penalty surcharge, \$18 jail and crime lab surcharge, plus court costs and fees.

SECOND COUNT: Except on New Year's Day, unlawfully sell or serve an alcohol beverage, to a person between the hours of 1:45 a.m. and 6:00 a.m. on weekdays or between 2:15 a.m. and 6:00 a.m. on Saturdays and Sundays, in violation of Madison General Ordinances Sec. 38.06(7)(a) for which the penalty is a forfeiture of not more than One Thousand Dollars (\$1,000) plus 26% statutory penalty surcharge, \$18 jail and crime lab surcharge, plus court costs and fees.

FACTS: On Sunday, February 24, 2008 at approximately 2:15 a.m., Madison Police Officer Paul D. Fleischauer received a report that A Place for Friends, 1205 Sherman Avenue, Madison, Dane County, Wisconsin, had a completely full parking lot. Officer Fleischauer responded to the premises and he noted that vehicles were parked so tightly that several vehicles were parked and

blocked in from all directions, making it impossible to move those vehicles. Officer Fleischauer also noted approximately twenty (20) people in line outside the rear door to the business. Officer Fleischauer made contact with patrons in the lot and requested that they leave the parking lot.

At approximately 2:35 a.m., after the legal time that alcohol can be sold or consumed on a licensed premise, Officer Fleischauer and other officers walked up to the licensed premises. Officer Fleischauer observed that there were numerous people inside the premises with party lights going on and off. Officer Fleischauer noted the rear door was locked. Officer Fleischauer could see what appeared to be a very large crowd inside the business. Officer Fleischauer could also see several people holding containers of alcohol beverages, including beer bottles.

Officer Fleischauer began knocking on the door. After several minutes, a male came to the door and identified himself as the owner of the licensed establishment, Darius A Wilson. Officer Fleischauer initiated contact with Wilson and asked Wilson to show him the liquor license for the establishment. Upon examining the license, Officer Fleischauer noted it was a Class B combination license with a capacity of 99 people. Officer Fleischauer informed Wilson he appeared to be over capacity. Officer Fleischauer observed other officers contact several people in the bar who were still drinking alcohol beverages. Wilson stated that the establishment had stopped serving alcohol at 1:45 a.m., but that he was not aware that customers had to finish their drinks. Officer Fleischauer and other officers made an estimation of the number of people inside the establishment as approximately 150 people. People were leaving through both the front and back doors and Officer Deanna Reilly counted 93 people who left through the back door alone, not counting people who left through the front door. Officer Fleischauer observed officers take away alcohol beverages from customers inside the establishment. Officer Fleischauer told Wilson that several people had alcohol drinks in their hand when the officers entered the business. Wilson stated he had fourteen (14) employees working that night for security and staff.

O.R. No. 08-137290, 08-05-139

THIRD COUNT: Keeps or maintains a disorderly or riotous, indecent or improper house, contrary to Sec. 38.10(1)(a)2., Madison General Ordinances, for which the penalty is not more than One Thousand Dollars plus 26% statutory penalty surcharge, \$18 jail and crime lab surcharge, plus court costs and fees.

FACTS: On May 21, 2008 at approximately 1:32 am, Madison Police Officer David Meinert was dispatched to Meriter Hospital reference a battery incident that had taken place at A Place for Friends Bar & Grill LLC, 2105 Sherman Avenue, Madison, Dane County, Wisconsin. Officer Meinert made contact with Madison Police Officer Angie Dyhr who stated she was in the process of interviewing three females identified as Jessica Breiby, Jessica Evans and Amber Dawson who had driven Matthew Breiby to Meriter Hospital following the incident at the licensed establishment.

Officer Meinert reports that he made contact with Matthew Breiby while he was being examined by various medical personnel. Officer Meinert observed various bumps throughout the top of his head and temples. Officer Meinert observed an approximate ½ inch in length laceration just

above Breiby's right eye on his temple area with approximately 6 stitches. Officer Meinert observed an approximately 1 inch in length laceration in between Breiby's eyes, just above his nose, containing approximately 4 stitches and an approximately ½ inch length laceration on Breiby's left side temple by his left eye, containing approximately 3 stitches. Officer Meinert reports that he was told by RN Melissa Murray that Breiby's injuries included facial lacerations, which required approximately 13 stitches, bruising and possibly a mild concussion.

Officer Meinert reports he asked Breiby what happened and that Breiby stated "It was a struggle for my life" and I almost lost consciousness." Breiby told Officer Meinert at approximately 1:00 am on May 22, 2008 he was inside A Place for Friends Bar & Grill LLC, and was walking out of the upstairs bathroom which is located on the second floor of the bar to the left. Officer Meinert reports that Breiby stated that as he walked out of the bathroom, Suspect No. 1 approached him and asked him if he had any "green". Breiby stated that he took this to mean that Suspect 1 was asking him for marijuana and Breiby stated that he told Suspect 1 that he did not have any. Breiby stated that after he told Suspect 1 that he did not have any, Suspect 1 turned around and made eye contact with Suspect No. 2. After Suspect No.1 made contact with Suspect No. 2, Suspect No. 1 turned back around and confronted Breiby. Breiby stated that when Suspect No. 1 turned around he observed that Suspect No. 1 was holding a gun down by his waist, possibly with his right hand and that the handgun appeared to be a black 22 or 380 pistol and Breiby believed it was a real gun. Breiby stated that Suspect No. 1 turned around and pointed the pistol at him and Suspect No. 1 stated "Ya, Homey, I'm going to shoot your ass." Breiby stated that Suspect No. 1 then placed the barrel of the gun within a couple inches away from Breiby's stomach and while pointing at him, stated "you need to up your money". Breiby stated that he told Suspect No. 1 he did not have any and that Suspect No. 1 then put Breiby in a headlock by grabbing Breiby around the neck with Suspect No. 1's arm. Breiby stated Suspect No. 1 was "squeezing as hard as he could and it hurt like hell." Breiby stated that suspect No. 1 then began dragging him in the back room and as they got into the back room Suspect No. 1 struck Breiby on right side of his head at least 3 to 4 times with the gun. Breiby stated that he did not know if the barrel of the gun or the handle of the gun was being struck with but knew that it hurt and on a scale of 1 to 10 with 10 being the most pain, the pain was a 10. Breiby stated the door was open in the back room and he believes Suspect No. 2 was watching this occur. Breiby stated that while he was being hit with the gun he could then feel Suspect No. 1 place the tip of gun against his left forehead and state "I'm going to end your life". Breiby stated at this point he believed that Suspect No. 1 was going to shoot him. Breiby stated that he then attempted to get up as he did not get up and fight back as he did not want to get shot however at this time Suspect No. 1 and Suspect No. 2 began punching him in the face with closed fists several times. Breiby stated that this time Suspect No. 2 was going through his pockets attempting to find his cash and Breiby stated that he did have \$200 in cash in his right side jean pocket, however he kept a hold of this side of his pants pocket so they could not retrieve his money. Breiby stated he was unable to fight back and was just trying not to have the suspects steal his cash. Breiby stated that as this was taking place he overhead a female yelling his name "Drift". Breiby stated that Drift is his nickname and that the two suspects then ran off and that Breiby did not see which way they went due to the fact that he was on the ground and very hurt and he believed that the suspect were going to "kill me." Breiby stated that just after he was beat up by the suspects, his uncle and owner of the bar, Tony Dickerson, approached him at which time he told Dickerson briefly what took place. Breiby stated Dickerson requested Breiby's friends to take him to the hospital.

On May 22, 2008 shortly before 2:00 am, Madison Police Officer Chad G. Crose was contacted by Madison Police Officer David Meinert. Officer Meinert asked him to respond to 2105 Sherman Avenue reference an armed robbery and question anyone in the bar to see if they saw anything that night. Officer Crose reports that upon arrival he entered 2105 Sherman Avenue which is A Place for Friends bar. Officer Crose entered the bar and made contact with two black males standing behind the bar in the main bar room. The two black males were later identified as Darius Wilson and Charles A. Dickerson. Wilson and Dickerson identified themselves to Officer Crose as the co-owners of the bar. Officer Crose first asked Wilson if he knew anything about a battery or armed robbery that had occurred that evening. Wilson told him that Wilson was informed by several of his customers that there was a fight by the dumpsters behind the bar. Dickerson then walked over to Officer Crose and said that he had heard the same thing. Dickerson said that Dickerson was told someone got beat up in the back part of the parking lot at the bar. Wilson informed Officer Crose that none of his customers told him that they saw anything more than a fight near the dumpsters in the parking lot. Due to the fact that Wilson and Dickerson did not have any information and due to the fact that they were the only ones left in the bar, Officer Crose left the bar. Within minutes of leaving the bar, Officer Crose was again contacted by Officer David Meinert and that Meinert informed him that a witness told him that a robbery and battery incurred in the upstairs portion of A Place for Friends Bar. Officer Meinert asked if Crose would return to the bar again to make contact with the two owners. Officer Crose arrived back at the bar and made contact with Wilson and Dickerson and informed Wilson that he had information that the battery may have occurred in the upstairs portion of the bar. Wilson said that that was not possible due to the fact that he did not think anyone had been in the upstairs portion of the bar for most of the night. Wilson told him that Wilson believed that if there was a battery that occurred in the upstairs portion of the bar that Wilson would have heard it. Officer Crose reports that as he climbed the stairs to the second floor of the bar he was able to see small red drops of what appeared to be blood on the wooden stairs. When Officer Crose got to the second floor he found many more spots that appeared to be blood and that the spots on the floor were much bigger than the ones that were on the stairs. Officer Crose followed the trail of red spots into a room in the southwest corner of the upstairs portion of the bar and that when he entered the room he found the floor to be covered with large puddles of what appeared to be blood. Officer Crose again made contact with Wilson and informed him that Officer Crose believed that the battery occurred in the upstairs portion of the bar due to all of the blood on the floor. Wilson again told him that he did not believe that the battery occurred in his bar due to the fact that he did not hear anything. Wilson then stated if a battery occurred upstairs there would have been loud noises that he would have been able to hear. Wilson then told Officer Crose that he thought the battery may have occurred in the parking lot and that the victim walked up the flight of stairs on the exterior of the building and entered the second floor. Wilson stated he then saw "Matt walking down the stairs holding his head". Wilson said that he saw Matt and there was blood coming from his head. Officer Crose asked Wilson why he didn't call the police at that time. Wilson said it was close to closing time and he had to lock up the cash drawer. Wilson also said that there were a lot of people screaming and yelling and Wilson said that two girls took the victim out the front door. Officer Crose reports that he interviewed Dickerson. Dickerson informed him that he was behind the bar serving food and that a girl then came running down the stairs and said "they're fighting". Dickerson said that he then ran up the stairs and that he passed the victim on the stairs and saw the victim was holding his head. Dickerson

said that when he got upstairs there was no one around and Dickerson said he then walked out the back door to check the area. Dickerson then said they must have been on foot because he didn't see a car leave. Dickerson said he then walked back down the stairs and saw the victim standing with two females. Dickerson then said he told the females to get the victim to the hospital. Officer Crose reports that he then asked Dickerson if he heard anything prior to the victim walking down the stairs with blood coming from his head and Dickerson said he did not hear any loud noises coming from upstairs. As a result of this incident, Darius A. Wilson, agent for the licensee and Charles E. Dickerson, each plead no contest to ordinance violations of Resisting or Obstructing an Officer on September 19, 2008.

FOURTH COUNT: Unlawfully fail to have on the premises the licensee or some person who has an operator's license (bartender's license) in violation of Madison General Ordinances Sec. 38.06(2) and upon conviction thereof shall be subject to a forfeiture of not more than One Thousand Dollars (\$1,000) plus 26% statutory penalty surcharge, \$18 jail and crime lab surcharge, plus court costs and fees.

FIFTH COUNT: Unlawfully possessed on a premise covered by a retail or wholesale fermented alt beverage or permit any alcohol beverages not authorized for sale on the premises, in violation of Sec. 125.32(6), Wis. Stats., as adopted by Sec. 38.031, Madison General Ordinances, for which the penalty is a forfeiture of not more than One Thousand dollars, plus 26% statutory penalty surcharge, \$18 jail and crime lab surcharge, plus court costs and fees.

FACTS: On Thursday, May 29, 2008, Roger Johnson, Agent for the Alcohol and tobacco Enforcement Unit of the Wisconsin Department of Revenue, conducted an inspection of A Place for Friends Bar and Grill, LLC, 2105 Sherman Ave., Madison, Dane County, Wisconsin. Johnson entered the premises at approximately 2:21 and Johnson reports that he made contact with Charles Dickerson, who was in charge of the premises. Johnson reports that in the course of his investigation, Johnson was unable to find any invoices for much of the beer on the premises and Johnson seized 133 12 oz. bottled of beer for which there was no invoice record that the beer was purchased from a wholesaler. Johnson states he had the court verified by Madison Police Lt. Brian Ackeret as well as by Darius Wilson who had arrived at the premises a short time after Johnson. Johnson explained to Wilson that as a retailer, the business may only purchase alcohol from a licensed wholesaler. Johnson issued a property receipt for the seized property to Wilson.

During his investigation, Johnson reports that he learned that Charles Dickerson, who was in charge of the premises when Johnson arrived at approximately 2:21 pm, did not hold an operator's license, Johnson explained to Wilson, that as a licensed retailer, that either Wilson, as the Agent or a licensed operator must be present during all open for business hours, not just when they are selling alcohol.

SIXTH COUNT: Unlawfully failed to conspicuously display the retail Class B license for public inspection at all times, in a room or place where the activity subject to licensure is carried on, contrary to Sec. 38.05(6), Madison General Ordinances, for which the penalty is not more than One Thousand Dollars (\$1,000) plus 26% statutory penalty surcharge, \$18 jail and crime lab surcharge, plus court costs and fees.

SEVENTH COUNT: Unlawfully fail to have on the premises the licensee or some person who has an operator's license (bartender's license) in violation of Madison General Ordinances Sec. 38.06(2) and upon conviction thereof shall be subject to a forfeiture of not more than One Thousand Dollars (\$1,000) plus 26% statutory penalty surcharge, \$18 jail and crime lab surcharge, plus court costs and fees.

FACTS: On May 22, 2008 at approximately 3:00 pm, Madison Police Detective Cory Nelson, responded to A Place for Friends Bar and Grill LLC, 2105 Sherman Avenue, Madison, Dane County, Wisconsin. Detective Nelson reports he was accompanied by Madison Detectives Wall, Buechner and Woodley. Upon contact with Charles E. Dickerson, who was in charge of the establishment, Detective Nelson reports that the detectives identified themselves to Dickerson and advised Dickerson that the detectives were going to be checking out the premises.

Detective Nelson reports that Det. Wall asked Dickerson where the establishment's liquor licenses were located. Detective Nelson reports that no alcohol licenses could be seen in the establishment. Detective Nelson reports that Dickerson went to a back room and looked around for some time and eventually brought the licenses to the Detectives.

Charles Dickerson was the only employee on the premises at that time. According to the records of the Madison City Clerk, as of May 22, 2008, Dickerson was not the agent of the license and did not hold an operator's license issued by the City of Madison, Wisconsin.

O.R. NO. 08-271636

EIGHTH COUNT: Except on New Year's Day, unlawfully permit said tavern to remain open between the hours of 2:00 a.m. and 6:00 a.m. on a weekday, or between 2:30 a.m. and 6:00 a.m. on Saturdays and Sundays, contrary to Section 38.06(7)(b) of the Madison General Ordinances for which the penalty is a forfeiture of not more than One Thousand Dollars (\$1,000) plus 26% statutory penalty surcharge, \$18 jail and crime lab surcharge, plus court costs and fees.

NINETH COUNT: Except on New Year's Day, unlawfully possess or drink from an open container which contains alcohol beverages within a Class B licensed premises between 2:00 a.m. and 6:00 a.m. on weekdays or between 2:30 a.m. and 6:00 a.m. on Saturdays and Sundays, contrary to Sec. 38.06(7)(h), Madison General Ordinances, and upon conviction thereof shall be subject to a forfeiture of not more than One Thousand Dollars (\$1,000) plus 26% statutory penalty surcharge, \$18 jail and crime lab surcharge, plus court costs and fees.

TENTH COUNT: Unlawfully, as a licensee or employee of a licensee, performed services on the licensed premises while under the influence of intoxicants or controlled substances or both, in violation of Madison General Ordinances Sec. 38.06(8) and upon conviction thereof shall be subject to a forfeiture of not more than One Thousand Dollars (\$1,000) plus 26% statutory penalty surcharge, \$18 jail and crime lab surcharge, plus court costs and fees.

FACTS: On Wednesday, September 17, 2008, at approximately 2:10 a.m., Madison Police Officer Paul D. Fleischauer responded to A Place for Friends, 2105 Sherman Avenue, in the City

of Madison, Dane county, Wisconsin. Officer Fleischauer observed that numerous cars were parked on the street around the establishment as well as several cars parked in the back parking lot. Officer Fleischauer pulled up on Sherman Avenue just alongside the establishment and observed that the door was wide open with people coming and going and being extremely loud. Officer Fleischauer noted that there was an “open” sign illuminated in the front window which was flashing, and that the lights of the business were on. Officer Fleischauer requested additional police backup and responded inside the establishment.

Officer Fleischauer entered the establishment and counted eleven people in the immediate area just inside the doorway. Officer Fleischauer observed a black male standing in front of the bar with an orange colored liquid that was approximately two ounces full with a straw sticking out of it. Officer Fleischauer then observed Heidi Dickerson, known to him from prior contacts as a part owner of the establishment, pick up the cup and move it over to the garbage on top of several other cups. The male objected, stating that he wanted to finish it, and Heidi Dickerson said he couldn't. Officer Fleischauer picked up the cup and sniffed the liquid and held it up to his nose and noted a strong odor of intoxicants. Officer Fleischauer also stuck his finger in the liquid and held it up to his nose and he could clearly smell the odor of an intoxicating beverage. Officer Fleischauer noted the time to be approximately 2:15 a.m.

Officer Fleischauer made contact with Anthony Dickerson, known to him from prior contacts as the husband of Heidi Dickerson, and an employee of the establishment. Officer Fleischauer observed that Anthony Dickerson appeared to be significantly intoxicated. Dickerson would carry on in a cyclic behavior, suggesting in Officer Fleischauer's judgment a significant impairment, repeating the same things over and over again. Officer Fleischauer tried numerous times to speak with Darius Wilson, however every time he attempted to speak with Wilson, Anthony Dickerson interjected, and conversation with Wilson became impossible because of Anthony Dickerson's loud voice and unreasonable actions.

O.R. Nos. 08-251494 and 08-260743

ELEVENTH COUNT: Unlawfully, has kept or maintained a disorderly, riotous, indecent or improper house, in violation of Sec. 38.10(1)(a)2., of the Madison General Ordinances, for which the remedy is revocation, suspension or nonrenewal of any license issued pursuant to Chapter 38 of the Madison General Ordinances.

FACTS: On August 30, 2008, Officer Chad T. Crose was dispatched to A Place for Friends, 2105 Sherman Avenue in the City of Madison, Dane County, Wisconsin, reference a noise complaint.

The dispatcher informed Officer Crose that a caller stated that they lived two blocks from A Place for Friends and could hear someone in the bar with a public address (PA) system announcing an after bar party. Officer Crose made his way to the front of the bar and made contact with Anthony Dickerson, also known as Charles E. Dickerson, d/o/b 1/9/74. Officer Crose had had multiple professional contacts with Dickerson in the past. Officer Crose asked Dickerson if there was a PA announcement made at the bar that night. Dickerson stated he didn't know what Officer Crose was talking about, and that the bar did not have a PA system.

On September 7, 2008 at approximately 2:14 am, Officer Crose was again dispatched to the licensed establishment reference a noise complaint. At that time, Officer Crose could hear someone on a PA system from within the licensed establishment. The person on the PA was announcing an after bar party. Officer Crose made contact with Dickerson and asked him about the use of the PA system on August 30, 2008. Dickerson again denied having a PA system and stated it was just a “microphone”.

O.R. No. 08-285039

TWELFTH COUNT: Unlawfully, has kept or maintained a disorderly, riotous, indecent or improper house, in violation of Sec. 38.10(1)(a)2., of the Madison General Ordinances, for which the remedy is revocation, suspension or nonrenewal of any license issued pursuant to Chapter 38 of the Madison General Ordinances.

FACTS: On September 28, 2008 at approximately 2:03 am, Madison Police Officer Carey L. Leerek, was dispatched to A Place for Friends Bar at 2105 Sherman Avenue, in the City of Madison, Dane County, Wisconsin, reference a large fight. Upon arrival, Officer Leerek did not observe any active fighting but observed approximately 40 to 50 people scattering and heading to vehicles parked nearby. Officer Leerek made contact with MPI security personnel who had been working in the Webcrafters parking lot adjoining the establishment and they advised that people started flooding the street as they left the bar. They observed two women who began physically fighting and the rest of the crowd began pushing and shoving as well. They said that they observed flashlights being swung and used to hit people. The MPI guards said that they could not identify the parties who had been in the physical fight. Officer Leerek made contact with Charles E. Dickerson, an employee of the licensed establishment who stated that “Nothing happened”. Dickerson said he paid security guards to make sure that there was no problem. Upon further questioning, Dickerson stated that two females had been fighting in the bar and that they were separated and asked to leave so there was no problem.

THIRTEENTH COUNT: Pursuant to Sec. 38.10(4), of the Madison General Ordinances, as a result of points assessed against the licensee for the violations enumerated in counts 1, 2, 4, 5, 6, 7, 8, 9, 10, above, the licensee has accumulated in excess of 200 points, rendering any issuance of a formal expression of concern under Sec. 38.10(4)(d), of the Madison General Ordinances, inapplicable and the license shall be suspended or revoked, pursuant to Sec. 38.10(4)(d)2., Madison General Ordinances.

II. VIOLATIONS OF PROVISIONS OF CHAPTER 38, MADISON GENERAL ORDINANCES, WITHIN THE MEANING OF SEC. 38.10(1)(A)1.

The Complaint adopts by reference and realleges counts 1 – 2 and 4-10 as if stated herein.

NOW, THEREFORE , for the above stated reasons, the Complainant demands that the Common Council of the City of Madison suspend or revoke the combination Class B license to sell fermented malt beverages and intoxicating liquors issued to A Place for Friends Bar & Grill, LLC, dba A Place for Friends, 2105 Sherman Avenue, Madison, WI, pursuant to Sec. 38.10(1)(a), Madison General Ordinances.

STATE OF WISCONSIN)
) ss.
COUNTY OF DANE)

City of Madison Assistant City Attorney, Steven C. Brist, being duly sworn on oath, states that he has read the foregoing Complaint against A Place for Friends Bar & Grill, LLC, dba A Place for Friends, and that the statements are believed to be true of his 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 upon reports by Madison Police Officers filed pursuant to their official duties.

Steven C. Brist
Assistant City Attorney

Subscribed and sworn to before me
this ____ day of October, 2008.

Notary Public, Dane County, Wis.
My Commission expires: _____