

STATE OF WISCONSIN

CITY OF MADISON

DANE COUNTY

ALCOHOL LICENSING REVIEW COMMITTEE

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CITY OF MADISON  
City-County Building, Room 103  
210 Martin Luther King, Jr. Boulevard  
Madison, WI 53703,

Complainant,

vs.

Revocation of Class "B" Combination  
Alcohol Beverage License and  
21+ Entertainment License

T.C. VISIONS, INC.  
d/b/a VISIONS NIGHTCLUB  
c/o David A. Brown, Agent



Respondent.

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**COMPLAINT**

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NOW COMES the City of Madison by Jennifer Zilavy, Assistant City Attorney for the City of Madison, and alleges as follows, that:

1. The Complainant, Assistant City Attorney Jennifer Zilavy 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, she was and is a member of the City of Madison Office of the City Attorney, in her official capacity.

2. The respondent herein, T.C. Visions, Inc., David A. Brown, Agent, is the alcohol beverage licensee doing business as Visions Nightclub ("Visions"), 3554 East Washington Avenue, Madison, Wisconsin, according to documents filed with the City Clerk of the City of Madison.

3. The City of Madison Common Council granted a renewal of Respondent's Class B Combination Alcohol Beverage License for the period July 1, 2019 through June

30, 2020. 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.

4. The City of Madison Common Council granted a renewal of Respondent's 21+ Entertainment license for the period July 1, 2019 through June 30, 2020.

5. On information and belief, the licensee, under the City of Madison Class B Combination Alcohol Beverage License for the retail sale of alcohol beverages at the premises known as Visions, 3554 E. Washington Avenue, Madison, Wisconsin, has continued to violate various provisions of Chapter 38, Madison General Ordinances ("MGO"), as set forth in Madison Police Department officers' reports, City of Madison Building Inspection Notices, and Wisconsin Department of Revenue Special Agents report, to wit:

**A. VIOLATION OF CHAPTER 38 OF THE MADISON GENERAL ORDINANCES WITHIN THE MEANING OF § 38.05(3)(a)(1), MGO, EXPANDING OR CHANGING THE LICENSED PREMISES WITHOUT COMMON COUNCIL APPROVAL**

1. On December 13, 2018, Madison Police, Madison Building Inspection, and Madison City Attorney's office met at Visions with Tom Reichenberger and David Brown to discuss Vision's security plan due to shooting and stabbing that occurred inside Visions on December 9, 2018. While on the premises, Building Inspector Kyle Bunnow observed a number of issues that concerned him. In the basement of the building, Inspector Bunnow observed unpermitted work in the form of partitioned off areas poorly constructed with wood frame construction and missing elements that would have been required had the changes been approved. These areas are in the basement of Visions and include the area that is considered the dancers' dressing room. On the main floor of Visions,

Inspector Bunnow observed that viewing booths had been constructed and he was unaware of approved plans for the booths. Upon researching the matter, Inspector Bunnow discovered that an Official Notice was issued in September 2004 (#204238043) directing Visions to remove the booths and go through the appropriate approval process, which includes submitting plans and getting approval from the Alcohol License Review Committee. On December 14, 2018, Inspector Bunnow issued an Official Notice, CB2019-010-00263, directing Visions to obtain the required building permit and inspections for the private booths that were installed without approval. The notice states that in the alternative, the booths may be removed and the area restored to its originally approved condition. This notice also requires Visions to obtain the required building permit and inspections for the alterations that have been made to the basement area. The notice states that as an alternative, the unpermitted work could be removed and the area restored to its originally approved condition. As of August 15, 2019, Visions has not complied with Official Notice CB2019-010-00263.

**B. VIOLATION OF CHAPTER 38 OF THE MADISON GENERAL ORDINANCES AND CHAPTER 125 OF THE WISCONSIN STATE STATUTES WITHIN THE MEANING OF § 38.06(2), MGO, AND §125.68(2), WIS. STAT., NO LICENSED OPERATOR ON PREMISE**

1. On June 24, 2019, at approximately 6:25 p.m., Wisconsin Department of Revenue Special Agent Jason Lee went to Visions to perform a compliance check. While at Visions, Agent Lee discovered there was no licensed operator on the premises. An operator with an expired license arrived and then the corporate agent came on scene. Agent Lee contacted Madison Police to issue

a citation for no licensed operator, but there were no units available at that time.

(Agent Lee's Field Report dated 6/24/2019.)

**C. VIOLATION OF CHAPTER 38 OF THE MADISON GENERAL ORDINANCES AND CHATER 125 OF THE WISCONSIN STATE STATUTES WITHIN THE MEANING OF §38.07(18), MGO, AND § 125.68(8)(a)2-3, WIS STAT., ILLEGALLY PROCURING ALCOHOL BEVERAGES/REFILLED LIQUOR BOTTLES, AND § 139.25(9) WIS STATS., PRESERVATION OF RECORDS**

1. On June 24, 2019, at approximately 6:25 p.m., Wisconsin Department of Revenue Special Agent Jason Lee went to Visions to perform a compliance check. Agent Lee discovered that Visions was not purchasing alcohol from a licensed wholesaler and that they were purchasing bottles at retail and refilling bottles of alcohol on site. Agent Lee also discovered Visions was not keeping invoice records as statutorily required. (Agent Lee's Field Report dated 6/24/2019.)

**D. VIOLATION OF CHAPTER 38 OF THE MADISON GENERAL ORDINANCES AND THE WISCONSIN STATE STATUTES WITHIN THE MEANING OF § 38.10(1)(a)2, MGO, AND § 125.12(2)(ag)2, WIS. STAT., KEEPS OR MAINTAINS A DISORDERLY OR RIOTOUS, INDECENT, OR IMPROPER HOUSE**

1. For many years, neighbors living near Visions have complained to their alderpersons and to the City about disturbances and nuisance activities occurring at Visions and spilling over into their neighborhoods. Alders Ahrens, Foster, and their predecessors have been asked by their constituents to support liquor license non-renewal or revocation for Visions due to the nuisance issues that the neighbors say negatively impact their quality of life and their peaceful enjoyment of their homes.

2. On January 12, 2012, at approximately 1:22 a.m., Madison Police Officers Michael Martin and Christopher Dornan were dispatched to 3554 E. Washington Avenue reference a check property. The caller was the bar manager of Visions and called the police for extra patrol because he thought there might be a fight at closing. The officers arrived on scene as the bar was closing and remained in the parking lot as patrons exited. There was no disturbance. (Madison Police Case No. 2012-10003.)
3. On February 27, 2012 at approximately 12:18 a.m., Madison Police Officer Stacy Troumbly was dispatched to Visions reference a fight occurring in the parking lot in which a male had been knocked to the ground and was unconscious. Upon arrival, Officer Troumbly observed no visible disturbance outside Visions and did not locate a victim. Officer Troumbly went inside Visions and talked to staff and they stated they did not observe a fight or hear any disturbance outside. At 12:36 a.m., Officer Troumbly was dispatched to 2664 S. Stoughton Road regarding a caller who stated he had been assaulted at Visions approximately 10 minutes earlier. Upon arrival at 2664 S. Stoughton Road, Officer Troumbly observed the victim, later identified as David Walker, being carried out on a stretcher by Madison Fire Rescue. Officer Troumbly spoke with Thomas Daly, who had been with Walker at Visions. Daly stated that when they were leaving Visions Walker was driving and Walker backed into a car that had occupants. Daly said approximately six men exited the vehicle and confronted Walker. Two of the men grabbed Walker and held him down on the hood of Walker's vehicle while two men then "beat the shit out of him" according to Daly. Daly said he did not see any weapons but that they were just using fists. Daly said eventually the

group left and Daly went over to Walker who was now unconscious. Once Daly got Walker to wake up he drove him to Walker's home and called 911. Officer Troumbly proceed to Meriter Hospital where she had contact with Walker. Officer Troumbly observed Walker had a bloody nose, bloody mouth, swelled abrasion on his left cheek, both his eyes were swollen almost shut, and he had abrasions on his right hand. Walker stated the last thing he remembered was backing into the vehicle in the Visions parking lot and then getting out and apologizing and offering the other driver his information. (Madison Police Case Nos. 2012-00051880 and 2012-51872.)

4. On June 15, 2012 at approximately 1:02 am, Madison Police Officer Michael Martin was on routine patrol when he observed a male walk to the west corner near the entrance to Visions, pull his pants down, and urinate on the building. Officer Martin observed the man swaying as he urinated. Officer Martin made contact with the man, later identified as Lionel Cauley, D.O.B. . Officer Martin asked Cauley why he did not use the bathroom inside, and Cauley responded that it was too full and he was told to go outside. While issuing Cauley a citation, the outside bouncer approached Officer Martin and said Cauley had been in the parking lot for approximately a half hour and refused to pay to get in to Visions. The bouncer wanted Cauley to leave the property. (Madison Police Case No. 2012-164225.)
5. On October 22, 2012 at approximately 7:59 p.m., Madison Police Officer Glenn Davis was dispatched to 3554 E. Washington Avenue reference an intoxicated male sleeping in the parking lot. Upon arrival, Officer Davis made contact with a male identified as John R. Breen. Breen was unable to stand or walk without

assistance due to his level of intoxication. Officer Davis could not understand what Breen was saying because he heavily slurred his speech. An employee of Visions, identified as Jeffery Cerniglia, said that Breen had been in the parking lot for 15 minutes and that Cerniglia had called a taxicab for Breen, but Breen refused to pay for the cab. Breen was taken to detox. (Madison Police Case No. 2012-302988.)

6. On December 15, 2012, at approximately 1:06 a.m., Madison Police Officers were dispatched to Visions regarding a disturbance. Upon arrival, Madison Police Officer Dan Frei observed two Visions employees, later identified as David Brown and Daniel Brewer, holding down a male later identified as William Anderson, in the parking lot area of Visions. Officer Frei observed Anderson had a strong odor of intoxicants on his breath, his speech was slurred, his eyes were bloodshot and glassy, and he was loud and argumentative. Officer Frei learned that Anderson had been creating a disturbance inside Visions and was complaining that one of the dancers "assaulted him." Officer Frei learned that another male customer, who was 6'10" and 250 pounds, and who left when he learned police were called, grabbed Anderson from behind in a bear-hug style hold while he was inside Visions and carried Anderson outside to the parking lot. Once outside, the customer told Anderson he would put him down if Anderson calmed down. Anderson turned and attempted to punch the customer, and the customer then threw Anderson to the ground. At this point, two Visions employees, Brown and Brewer, held Anderson down until police arrived. Anderson's girlfriend, identified as Jennifer Erickson, was also on scene and intoxicated. She told the officers that one of the dancers had slapped her

boyfriend. Anderson was arrested for disorderly conduct. (Madison Police Case No. 2012-00354013.)

7. On March 20, 2013, at approximately 8:52 p.m., Madison Police Officers were dispatched to Visions reference a man who had run onto the stage and then was thrown out and threatened to shoot staff. Officers arrived on scene and contacted the suspect identified as Michael Marks. Marks was outside of Visions at the time officer contacted him. Officer Christopher Keys and Sergeant Jason Ostrenga initially had Marks at gunpoint because of Marks' threat to shoot Visions staff and when the Officers arrived Marks was in a crouched position and refused to show his hands. The Officers eventually gained control of Marks and escorted him to the rear of Officer Keys' squad car. Officer Keys noted a strong odor of intoxicants on Marks' breath and Marks staggered as they were escorting him. Officer Keys made contact with Visions manager David Brown. Brown told Officer Keys that Marks had been inside Visions for two to three hours and had been consuming alcohol. Brown stated that approximately 20 minutes prior to Officers arriving on scene. Marks had run onto the stage and was dancing and causing a scene. Marks was told to leave, but he would not get off the stage. A bouncer, identified as Troy Hendrickson, then picked up Marks and physically carried him outside. As Hendrickson carried Marks out, Marks grabbed a railing inside the vestibule area of the front entrance and held on in an attempt to stay inside Visions. Brown and Hendrickson stated that once they got Marks outside, Marks made a symbol of a gun with his hands and gestured toward them with it and said something about having a gun. Upon further contact with Marks, Officer Keys noted his eyes were watery and bloodshot and that his speech was slurred.



Officer Keys determined Marks was highly intoxicated and placed him into protective custody and transported him to the Dane County Detox Center. (Madison Police Report 2013-00067111.)

8. On March 16, 2013, at approximately 1:53 a.m., Madison Police Officer Gabriel Heck was dispatched to Visions for a disturbance. Dispatch advised that they could hear sounds of a possible disturbance over the telephone during the call. Officer Heck arrived on scene and made contact the alleged victim identified as Tiffany Driver. Driver told Officer Heck that at approximately 1:45 a.m. she arrived at Visions with her friend Tesha. Driver said she was inside Visions near the stage when an individual identified as Moshea Norris approached her and called her a bitch. Driver said she told Norris to be quiet and told him not to touch her. Norris then left Visions, and Driver left a few minutes later. Driver said immediately when she walked out of Visions Norris attacked her and said, "If you act like a dude, I'll beat you like a dude." Driver said Norris punched her with closed fists in her head and neck area. Driver said after Norris punched her approximately eight times he laughed and left with a group of unidentified males. Officer Heck was unable to find any witnesses on scene who would cooperate. Driver told Officer Heck that Norris had recently been involved in a shots fired incident at the Tip-Top Tavern and that there were many witnesses to the event but that everybody was afraid of Norris so nobody wanted to report it. Officer Heck's attempts to contact Norris were unsuccessful. (Madison Police Case No. 2013-00072286.)
9. On March 21, 2013, at approximately 9:05 a.m., Madison Police Officer Rudy Natera was assigned to contact a Dean M. McConley, who identified himself as

the owner of Visions, regarding an attempted burglary. Officer Natera contacted McConley and McConley told Natera that he closed Visions around 2 a.m. on this date and around 8:30 a.m. discovered the attempted burglary. McConley stated the only thing a burglar could have taken would have been alcohol because McConley emptied the video poker machines a couple of days earlier. Officer Natera observed the broken window and other evidence of the attempted break-in, and an investigator arrived on scene to take photographs and gather additional evidence. (Madison Police Case No. 2013-77503.)

10. On April 2, 2013, Madison Police Officers were dispatched to Visions reference a disturbance. Officer Andrew Strachota made contact with the victim identified as Sara Vine. Vine said that she and Heather Lindauer had been out to eat and had gone to a couple of other bars and had been drinking for a while when they went to Visions. Vine said that once at Visions, Lindauer was "out of control" and asked by staff to leave. Vine and Lindauer then argued about Lindauer leaving, and Lindauer grabbed Vine's hair and pulled her head back. Lindauer then punched Vine and kicked her in her butt, upper leg, and knee area causing Vine to fall into one of the workers who was sitting at the end of the bar. Vine said at this point the bartender took Lindauer outside and called police. Officer Strachota observed that Lindauer appeared heavily intoxicated. Lindauer had slurred speech, watery eyes, and was having difficulty answering Officer Strachota's questions. Lindauer was charged with Disorderly Conduct and Battery. (Madison Police Case No. 2013-00088726.)
11. On March 29, 2013, at approximately 1:39 a.m., Madison Police Officer Christopher Keys was on routine patrol when he observed a large crowd in the

front parking lot of Visions. An individual who stated there were approximately ten individuals fighting in the front parking lot of Visions approached Officer Keys. Officer Keys drove into the lot, activated his emergency lights, and observed a crowd in the eastern corner of the parking lot involved in what appeared to be a physical disturbance. Officer Keys approached the crowd and made contact with two individuals identified as Greg Randle and Branden Fisher, the two who appeared to be engaged in a physical altercation. Randle appeared to continue to be highly agitated as his had clenched fists while being restrained. Officer Keys ordered Randle to get on the ground, and Randle did not comply. Randle did raise his arms, but he continued to stare at Fisher and at Officer Keys. Because of Randle's agitated state and failure to get on the ground, Officer Keys drew his Taser, pointed it at Randle, and continued ordering him to get on the ground. Randle eventually did so. At this time, another officer arrived on scene. Officer Keys spoke with Fisher and noticed his shirt was torn. Fisher continued to engage the crowd and at one point actively went toward the crowd, so Keys placed Fisher in handcuffs and placed him in the rear of a squad. Officer Keys then spoke with Randle. Randle said he confronted Fisher due to Fisher potentially breaking a bottle over Randle's brother's head. Randle and Fisher were both issued citations for Disorderly Conduct and Randle was cited for Obstructing an Officer. (Madison Police Case No. 2013-00085060.)

12. On April 27, 2013 at approximately 1:25 a.m., Madison Police Officers David White, Dan Frei, and Drew Strachota were dispatched to Visions reference a disturbance and a 911 hang-up. Officer Frei arrived on scene and contacted an individual identified as Daniel Krausman. Krausman told Officer Frei that an

individual was urinating by his motorcycle, and he confronted that individual. That individual was still on scene and was identified as Salvatore Cornaccione. Officer David White observed that the ground near Krausman's motorcycle was wet and consistent with someone who had just urinated. It had not rained and the ground was otherwise dry. Officer White made contact with Cornaccione and asked him for his drivers' license. Cornaccione had extreme difficulty producing his driver's license due to his level of intoxication. A crowd had gathered to watch what was going on. Officer Michael Martin observed that Cornaccione had a heavy odor of intoxicants on his breath, his eyes were bloodshot and glassy, and he had difficulty understanding simple instructions. Officer Martin determined Cornaccione was incapacitated by alcohol and placed him in protective custody and took him to the Dane County Detox Center. Cornaccione's companions, identified as Samreen Khan and William Powell, were also intoxicated. Cornaccione was cited for Resisting/Obstructing an Officer and Depositing Human Waste. (Madison Police Case No. 2013-00118106.)

13. On May 27, 2013, at approximately 11:35 p.m., Madison Police Sergeant Jason Sweeney was on routine patrol when he observed a small crowd gathered at Visions. Sergeant Sweeney observed the crowd was approximately five to six people standing on the west side of the building near the back of the building. Sergeant Sweeney found this unusual since Visions' entrance is on the opposite side of the building. Sergeant Sweeney parked across the street and observed the activity through binoculars. Sergeant Sweeney observed numerous young males walking from the van and making contact with others. It appeared to

Sergeant Sweeney that this activity was drug sales going on. Eventually contact was made with the van and the individuals. Upon executing a search, bottles of hydrocodone/acetaminophen were found as well as a substantial amount of suspected (and later tested positive) heroin. Sergeant Sweeney made contact with Visions staff, identified as Jeff Cerniglia, and told him what had been going on in the parking lot. Cerniglia told Sergeant Sweeney that the fact that the van was parked on the public street made the issue not Visions' responsibility. Sergeant Sweeney then spoke with a manager and told him the suspects had been in his parking lot without going into the bar itself. It appeared to Sergeant Sweeney that Visions staff and management was tolerating and perhaps purposefully ignoring the parking lot behavior. Cerniglia and the unidentified manager said they would phone police if they observed any similar behavior in the future to prevent the bar from losing its liquor license. Ultimately, 56.2 grams of heroin was recovered along with various pills. Two quest cards in names of individuals other than those on scene were also recovered. A Federal grand jury investigation conducted in relation to this incident. (Madison Police Case No. 2013-00154387.)

14. On July 4, 2013, at approximately 1:30 a.m., Madison Police Officers Henry Whyte and Gabe Heck were dispatched to Visions reference a disturbance. Dispatch advised that the complainant reported that someone needed to leave the bar and then there were possible sounds of a struggle on the telephone. Upon arrival, Officer Whyte observed a male he recognized as an employee of Visions holding down a female, later identified as Brittaney Boyd. As soon as Officer Whyte entered the establishment, his eyes started to burn and he smelled

what he recognized as OC (pepper) spray in the air. Officer Whyte asked the employee, identified as David Brown, what happened. Brown stated that Boyd had refused to leave the bar, battered him, and then sprayed him with OC spray. Officer Whyte knelt beside Boyd and asked her if she was going to cooperate and calm down, due to the fact that she was yelling and swearing and attempting to stand up. Boyd responded, "Fuck you, pussy." Officer Whyte then placed Boyd in handcuffs and assisted her in standing. Officer Whyte observed that Boyd was intoxicated. As Officer Whyte walked Boyd to his squad car, she began to struggle and yelled and screamed that she did not want to have sex with a guy and that is why she had gotten into a fight. Officer Whyte placed Boyd in a squad car, during which time Boyd spit bloody spit into Officer Whyte's left eye. Officer Whyte again contacted Brown. Brown stated that he did not know Boyd's name, but that he recognized her as a former dancer at Visions. Brown stated that Boyd had entered Visions at around 1:20 or 1:25 a.m. with 8 to 10 females and two males. Brown stated he informed the group they were closing and that they would not be able to enter. Brown stated that Boyd and the rest of the group initially turned and walked directly outside but that Boyd returned and walked straight back into the bathroom. Brown said when Boyd returned from the bathroom he told her she had to leave, and she took out the OC spray and sprayed him in the face. Boyd was charged with Battery – Intentional using OC Device-Bodily Harm, Resisting/Obstructing an Officer, and Discharging Bodily Fluids at Public Safety Worker. (Madison Police Case No. 2013-00201437.)

15. On October 6, 2013, at approximately 1:35 a.m., Madison Police Officers Michael Martin and David White were dispatched to Visions reference a larger intoxicated

male fighting. Upon arrival at Visions, Officer Martin observed the individual, identified as Michael Mojica, outside the front of the bar standing next to a car. Mojica was weaving back and forth and upon speaking, had slurred speech, and was obviously intoxicated. Officer Martin contacted bar manager Dave Brown. Brown said that Mojica had been by the dancing tables on the south side of the bar, and customers had complained that he had spilled other customers' drinks. Brown said Mojica was told to leave. Security personnel William Holmes attempted to escort Mojica out when both men went down to the ground by the main entrance. Brown stated he heard people telling Mojica to quit fighting or they will have to call the cops. Brown says he heard Mojica say he did not care. Several other bar staff responded to the area to assist Holmes in removing Mojica from the bar. Brown said Mojica tried to come back in the bar and was pushed back out. Brown stated he did not want Mojica cited and that he would be welcomed back to the bar if he was not violent or drunk. Mojica is apparently a regular at the bar. (Madison Police Case No. 2013-314764.)

16. On December 24, 2013, at approximately 10:05 p.m., Madison Police Officer Henry Whyte was dispatched to return a telephone call regarding a fight that had taken place at Visions on December 20, 2013. Officer Whyte called the complainant, identified as Anthony Younger. Younger stated that he is dating Tiffani Liska and that he wanted to report that Tiffani's brother, Joey Liska, had been "beat up" at Visions. Younger stated that Joey texted his sister Tiffani on December 21, 2013, to give him a ride to pick up his truck from the Visions parking lot. Younger stated that since the incident Joey had been unable to speak other than answering yes or no questions. Younger said he and Tiffani

were able to determine that Joey had gotten into some type of altercation at Visions and likely ended up “knocked out” in the parking lot area. Younger said he heard through the grapevine that Joey had been unconscious in the parking lot area and that numerous patrons were laughing, joking, and taking pictures of Joey. Younger and Tiffani took Joey to the hospital and hospital staff advised Joey had a brain bleed on the left side of his head and swelling on the right side. Joey was admitted to the hospital and a CT scan was planned for December 25, 2013. On December 26, 2013, Officer Whyte received an e-mail from Younger and Younger stated that Officer Whyte should contact Shane LaMore for more information. Younger stated that he had been hearing that Cole Foster might be the one who beat Joey. Officer Whyte had also received an e-mail from Tiffani who indicated it was likely Cole Foster that battered Joey and dragged him to the area dumpster behind Visions. Cole Foster is a regular at Visions and was involved in a stabbing/shooting at Visions in December 2018. (Madison Police Case No. 2013-401294.)

17. On December 23, 2013, Madison Police Officer Henry Whyte and Officer Michael Martin were dispatched to the Walgreens at Highway 51 and 151 (East Washington Avenue and Stoughton Road) reference a “man who had walked in with blood all over.” Upon arrival at Walgreens, Officer Whyte observed a male later identified as Jonathan McGee. McGee’s face was swollen and he was bleeding from his mouth area. Officer Whyte immediately smelled a strong odor of intoxicants coming from his breath. McGee stated that he had been at Visions Nightclub and he had “gotten jumped.” Officer Whyte asked McGee where the altercation took place and he said, “I don’t know, inside and outside.” Officer



Whyte asked McGee who battered him, and he stated, "I don't know. Maybe one guy. Maybe ten guys." McGee estimated he had been at Visions for a couple of hours. McGee stated that he had no altercations with any of the dancers or employees of Visions nor had he been in any type of altercation with other patrons. Officers Whyte and Martin (after paramedics arrived to tend to McGee) went to Visions and spoke with employees Jeff Cerniglia and Daniel Brewer. They stated there had been some type of altercation/commotion in the bar between a number of unidentified black males. Cerniglia and Brewer said those males had since left. Cerniglia and Brewer both stated that the altercation had taken place inside of the bar and that it was a verbal exchange. Brewer stated that approximately five to ten minutes later he was told by a female named Jade that a black male was "passed out" in the doorway. Officer Whyte then illuminated the floor of the vestibule/foyer and observed what appeared to be a small amount of blood on the floor. Officer Whyte asked Brewer if that was where the black male was "passed out" and he said, "Yes." Officer Whyte asked Brewer how the passed out male had left and he stated he thought Jade had helped him up and possibly driven him from the scene. Brewer and Cerniglia stated that Jade had since left the scene and that neither of them had contacted the police during the disturbance and did not attempt to contact Fire/EMS to check on the male who had been "passed out" in the doorway. (Madison Police Case No. 2013-00400471.)

18. On January 7, 2014, at approximately 1:48 a.m., Madison Police Officer Glenn Davis was dispatched to Visions reference a theft with suspect information. Upon arrival, Officer Davis made contact with a female identified as Cody

Gonzalez. Gonzalez is a dancer at Visions and she stated her wallet was stolen and that the wallet contained her birth certificate, driver's license, and \$50. Gonzalez said that a new dancer named "Brie" had stolen her wallet. Gonzalez stated Brie asked to go home early and they were both downstairs in the dressing/staging area when Gonzalez ran upstairs to cover Brie's dance. Gonzalez stated that during her dance she saw Brie leave Visions. Gonzalez said that after the dance, she went back downstairs and her wallet was missing and that Brie was the only one in the area near her purse and wallet when Gonzalez went upstairs. Gonzalez said Brie had a bad night and she believed Brie had been fired. Gonzalez contacted Officer Davis sometime later and told him that Brie had called the Visions manager and asked to borrow money and asked for her job back. (Madison Police Case No. 2014-00005968.)

19. On January 16, 2014, at approximately 1:29 a.m., several Madison Police Officers were dispatched to Visions for a disturbance. The caller reported there was a man throwing chairs. Officer Carey Leerek arrived at Visions and observed someone wearing a black jacket climbing over the fence to the east of Visions. Officer Leerek headed toward the bar and made contact with a man identified as Dean McConley. Officer Leerek observed an unidentified black male sitting at the bar and Dean McConley was telling him to leave. The black male was ignoring McConley and Officer Leerek ordered the man to exit the bar, which he did after yelling at Officer Leerek and bar employees. The females on staff complained that the black male had been obstinate and uncooperative. A man identified as Cory Kaschub, a friend of the man who was throwing the chairs (identified as Michael Lampman), told Officer Leerek that Lampman had "got into

it" with the black male who had just left. Officer Leerek went to see if the black male was still outside, but he was gone. Officer Leerek continued her conversation with Cory. Cory said the black male started the problem but that Lampman was continuing it and the two exchanged words and threats. Cory said bar staff asked them both to leave but neither did. Officer Leerek then spoke with the manager, McConley. McConley said the black male was a regular customer and that he was arguing with Lampman. McConley said Lampman was asked to leave about 5 times, but he refused and then started throwing chairs. McConley wanted an Unruly Patron citation issued to Lampman. Lampman was contacted by Officer Glenn Davis off-premises, and Officer Davis said Lampman was very intoxicated and had vomited several times. Lampman was cited for Disorderly Conduct and given an Unruly Patron citation. (Madison Police case No. 2014-00015801.)

20. On February 2, 2014, at approximately 2:09 a.m., Madison Police Officers Glenn Davis and Carey Leerek were dispatched to Visions reference a caller getting pushed into a door by the owner who was trying to get people to stop having sex in the bathroom. Upon arrival at Visions, Officer Leerek contacted a female identified as Ariele Frazier. Officer Leerek observed that Frazier was clearly intoxicated as her speech was extremely slurred and she had trouble getting her story or version of events consistent. Frazier smelled strongly of alcohol. Officer Glenn Davis spoke with Visions' bouncer and he told Officer Davis that Frazier had been told several times by him and the owner of Visions to leave, but she refused. During her contact with police, Frazier was loud and aggressive and the Officers never got a good description of what had happened that resulted in

the disturbance. Frazier was cited for Trespass After Notification. (Madison Police Case No. 2014-00033867.)

21. On February 12, 2014, at approximately 12:27 a.m..., Madison Police Officers were dispatched to Visions reference a disturbance. While in route, Officer Henry Whyte heard dispatch advised that there was a black male wearing a brown-hooded zip-up jacket currently fighting with staff members in the front lobby area of Visions. Upon arrival at Visions, Visions manager David Brown approached outside Officer Whyte. Brown said, "That's them there" as two black males traveling in a dark-colored vehicle were pulling out of the lot. Brown told Officer Whyte that one of the black males was attempting to start a fight with one of the dancers, and the black male ended up throwing some items around the bar area. Officer Whyte got in his squad and conducted a traffic stop on the vehicle Brown had identified. Two subjects in the vehicle identified as Bredell Hennings and Curtis Bode. Brown stated that he did not want the individuals cited for disorderly conduct but that he did want them to receive an Unruly Patron citation. Officer Whyte issued Bode and Hennings Unruly Patron citations. (Madison Police Case No. 2014-45268.)

22. On July 24, 2014, at approximately 12:54 a.m..., several Madison Police Officers were dispatched to Visions reference an armed robbery. Upon arrival, Officer Christopher Keys contacted the victim identified as Ryan Bruns. Bruns was standing in front of Visions but asked to speak to Officer Keys across the street on Schmedeman Avenue on the sidewalk. Officer Keys observed that Bruns appeared to be highly intoxicated as he had a strong odor of intoxicants emanating from his breath, bloodshot, watery eyes, and slurred speech. Bruns

stated he had been in Visions since around 10:00 to 10:30 p.m. and that he noticed nothing unusual during his time in Visions. Bruns stated that when he left Visions he walked northbound on Schmedeman toward Ridgeway where his car was parked. He got into his car and shortly after that a handgun was placed two inches from his face on the left side. Shortly thereafter, another suspect put a gun in Bruns' face. Bruns said the suspect was between him and his open door. Bruns described the suspects as black males and said they left in a four-door vehicle with what he thought was plate number 304UGL. Bruns said the robbers told him to give them everything he had and Bruns turned over his cell phone. The robbers said they did not believe that was all he had and patted down his pockets and took his wallet. Officer Michael Martin proceeded to Visions and made contact with the bouncer at the door identified as Ryan Richgels. Richgels told Officer Martin that there had been no disturbances inside. Richgels told Officer Martin that as a black male walked by that maybe he was involved because he had been in and out of the bar and had been using his phone frequently. Richgels said Bruns is a regular at Visions. Officer Martin caught up with the black male and identified him as Demetrius Jones. Jones said he had been drinking at Visions and that he was there with some cousins when other people he knew began to show up. Jones said the two groups do not get along and he was kind of in the middle. Jones said to the groups they could do what they wished as he spent time around the boxing machine. Officer Martin asked David Brown to save the video from that night for him. (Madison Police Case No. 2014-236146.)

23. On September 6, 2014, at approximately 8:54 a.m., Madison Police Officer

Kristin Elliott was assigned to follow-up with a Nick Nowicki regarding his car being stolen from Visions' parking lot sometime after 9:00 p.m. on September 5, 2014. Nowicki said he arrived at Visions around 9:00 p.m. and he thought he had locked his car. Nowicki said he left Visions around 1:00 a.m. and his car was not in the parking lot. Nowicki went back to his hotel in Sun Prairie and then returned to Visions the morning of September 6 around 8:30 a.m. to look for his vehicle. Nowicki had the only key to the vehicle on his person and he said he had not given anyone permission to drive his vehicle and that he wanted to file a stolen vehicle report. On September 6 at approximately 7:20 p.m., Nowicki called Officer Elliott to say his car had been located at the Motel 6 on Thierer Road. (Madison Police Case No. 2014-00291773.)

24. This incident occurred on December 6, 2014, but was not reported to Madison Police until September 21, 2017. On December 6, 2014, a female identified as DG and several of her team members from the Wisconsin National Guard 1-147 Aviation Unit went to Visions. DG stated that while they were seated in their seats, a stripper pulled her unit-member, a female identified as JG onto the stage and while JG was on her back, the stripper straddled her. DG said the stripper also "motor boated" JG. DG described the dancer as aggressive. DG stated that JG was on stage for approximately two minutes. DG stated that JG appeared to be enjoying herself and was laughing, smiling. DG stated as she was standing next to the stage watching JG, the stripper "yanked at my hand." DG stated the stripper was now pulling DG onto the stage and was being "overly aggressive". DG was telling her unit members that she did not want to go on the stage, and she told the stripper, later identified as Niki, to stop pulling her onto

the stage. DG said she repeatedly told Niki to stop and that she was not okay with what was happening and that Niki kept pulling and grabbing DG's shirt. DG said she did not have any leverage and it was tough to hold on to the edge of the stage to prevent being pulled onto the stage. DG stated that once on stage, she was in a seated position and the stripper was straddling her, tugging at DG's shirt, and trying to pull it over her head. DG said she tried to hold on to the bottom of her shirt to keep it down but Niki was able to take her shirt off her. DG said she felt helpless. Niki then wrapped her arms around DG and unlatched her bra. DG said she moved her arms and hands to cover her breasts and Niki grabbed her hands by the wrists and pulled her arms apart while pushing DG back. DG stated that at this point, her bra fell down and her breasts were fully exposed. DG said that Niki kept pushing her backwards and then held her hands down and out to her side. DG said she repeatedly told Niki to stop. DG said she felt humiliated and that no one was helping her. DG said it appeared everyone in the club was enjoying what they were seeing. DG said that the stripper let go of her arms and she sat up as quickly as she could and put her bra back on but did not fasten it and she put her shirt back on, all while Niki was still straddling her. DG said that Niki was able to pull her arms apart and get her shirt over her head a second time and because her bra was not fastened that fell off again too. DG said Niki pushed her backward and held her arms down with her breasts exposed. Niki eventually let go of DG's arms and got off her, and DG immediately got off the stage and sat in her chair holding her arms and hands across her chest. JG grabbed DG's shirt and bra off the stage and gave the items to DG. DG described the Niki as a white female with brown shoulder length

hair, medium height, and skinny. DG stated the dancer appeared to be a little older, maybe in her forties, and that she had augmented breasts. On September 21, 2017, at approximately 3:30 p.m. Madison Police Detective Paul Bauman called Thomas Reichenberger, the owner of Visions. Detective Bauman asked Reichenberger about video from this incident, and Reichenberger said the video does not capture the stage or the audience and that they do not keep video that long. Detective Bauman asked Reichenberger about employee records and Reichenberger stated that for dancers they only collect a basic application that may have a name and contact information. Reichenberger stated the dancers are not employees of Visions but that they are independent contractors who work for tips. Detective Bauman described DG's incident, and Reichenberger stated that the incident was "fairly typical" behavior at a gentlemen's club. Reichenberger stated that he could not imagine a scenario where one of his dancers would physically force a person to be on stage without that person consenting, and he found it hard to believe that someone would not physically stop a dancer from doing the things alleged. During the course of Detective Bauman's investigation, at one point he had to threaten Visions with a subpoena because they were not forthcoming with information. Once Detective Bauman made that threat, Visions responded within 15 minutes. A male member of DG's Air National Guard unit confirmed that DG was on stage and that DG's breasts were exposed, and another unit member confirmed the aggressiveness of Niki. (Madison Police Case No. 2017-00339559.)

25. On January 10, 2105, Madison Police Officers Henry Whyte and David White were dispatched to Visions reference a husband calling to report that his wife



had been struck by an individual they believed was named Carl Sarbacher. Upon arrival at Visions, Officer White was informed that Carl was inside Visions wearing a grey sweatshirt. Carl is a bouncer at Visions, but he was not working on this night. Officer White made contact with Carl. Carl informed Officer White he has a friend named Dalton who he told could bring his brother to Visions and Carl would get them in with no cover. Carl stated Dalton and the people he came with were very intoxicated and that Dalton brought more than just his brother. Dalton brought his fiancée Sarah and another female Carl did not know. Dalton told Carl that they all had been drinking since 10:00 a.m. Carl told Dalton that he could not get them all in for free but that if they gave Visions \$15 he would get all five of them in. Once inside, Dalton was mouthing off to people and Carl decided Dalton needed to leave. Carl asked one of the bouncers to help him get Dalton out. Dalton's fiancée started yelling at Carl and saying, "you know who the fuck I am? Don't fuck with me." Dalton's fiancée then hit Carl in the chest with an open hand, and Carl reacted and slapped her with an open hand in the face. Dalton became upset and began yelling at Carl for hitting his fiancée. At this point, they were all outside in the snow-covered parking lot and Dalton was getting more aggressive with Carl. Carl pushed Dalton away, who fell and hit his head on the ground. Sarah then began yelling at Carl and jumped at Carl as if she was going to hit him. Carl pushed Sarah back, and she then stepped on Dalton as well as the snow covered parking lot and fell backwards hitting her head on the truck that was parked there. Carl stated at this point Visions security came outside and broke up the disturbance. (Madison Police Case No. 2015-00010938.)

26. On January 15, 2015, at approximately 9:10 p.m., Madison Police Officer Lars Wild was dispatched to Visions reference a battery that had occurred. Upon arrival, Officer Wild observed an individual identified as Cesar Hernandez outside of Visions standing with EMS. Officer Wild observed a large bump above Hernandez's right eye that was about 1 ½ inches wide. Hernandez stated he had been receiving a private dance from a female who works at Visions. Hernandez said he paid \$20 for the first dance and then the female continued to dance for him and upon finishing asked Hernandez for more money than he had. Hernandez said he did not have enough money and that the dancer performed the two additional dances of her own volition. The dancer told staff members, and one of the bouncers escorted Hernandez out of the club. Hernandez said the bouncer grabbed him with both hands and pulled him out of the building. Hernandez stated that once he was out the final exit door the bouncer struck him in the head with a closed fist. Officer Wild contacted the bouncer identified as William Holmes. Holmes denied hitting Hernandez and said he grabbed Hernandez and escorted him out and pushed him through the doors. Officer Wild and Sergeant Minert returned to Visions on January 16 to obtain the video of the incident they requested the night before. Visions manager David Brown told them the video was not available because their IT guy comes at unknown times. (Madison Police Case No. 2015-16272.)
27. On February 9, 2015, at approximately 1:30 a.m., Madison Police Officers Michael Goodchild and Joseph Boespflug were dispatched to Visions for a reported theft. Upon arrival, Officer Goodchild contacted the victim identified as Amanda Barnes. Barnes stated that she left her wallet on a table next to the

stage while she performed her routine. While on stage, Barnes saw "Sparkles" place her bag on top of Barnes' wallet but thought nothing of it because it is common for dancers to store their personal items near the stage. During her performance, Barnes saw "Sparkles" pick up her bag and go to the bathroom. After she was done on stage, Barnes escorted a customer to the "Champagne Room" and upon returning found her wallet missing. Barnes began "tearing the place apart" searching for her wallet and then went into the bathroom where she found her wallet on top of the trash. The only thing missing from the wallet was the \$400 cash Barnes had earned that night. Officer Goodchild went back the next night to talk to "Sparkles" only to find that "Sparkles" had skipped out on her shift. (Madison Police Case No. 2015-00043426.)

28. On April 14, 2015, at approximately 1:39 a.m. Madison Police Officer Henry Whyte received a report from Visions staff that a group of black females were involved in a physical disturbance in the front lot. Upon arrival, numerous cars were leaving the area. Staff was going to check video; however, no damage to any property and no suspects or victims remained on scene. Officers were checking the surrounding neighborhood and nothing and no one was located. (Madison Police Case No. 2015-107294.)
29. On May 1, 2015, Nathan Delmore, Kevin Bassenbrook, Codey Byers, and Lora Oliveri went to Visions. While at Visions, Oliveri attempted to kiss Bassenbrook, but Bassenbrook rebuked Oliveri's advances. Oliveri's son Codey Byers became upset with Bassenbrook, asking him if he was a "man or a boy" and demanding that Bassenbrook buy his mother a drink. Bassenbrook stated that Oliveri offered to buy him a drink but he refused the offer. Delmore and

Bassenbrook then left the bar, and Byers came running up behind them and punched Delmore sending him to the ground unconscious. Bassenbrook stated that Byers repeatedly yelled at Delmore as he lay unconscious on the ground that he should not have messed with his mom and that he got what he deserved. Delmore suffered a concussion and a facial fracture as a result of the battery. Byers and his mother returned to Visions after the battery. Officer Gerald Brieseth asked Visions Manager David Brown for a copy of the video for the parking lot and Brown informed him they would call the IT person to obtain the video and re-contact the police when they had it. (Madison Police Case No 2014-00136140)

30. On May 5, 2015, at approximately 2:01 a.m., Madison Police Officer Henry Whyte was monitoring the crowd of patrons exiting Visions when he suddenly heard a loud commotion and observed a group of approximately 15 to 20 people involved in a shoving match and fistfight. Officer Whyte activated his emergency lights and pulled onto Schmedeman Avenue and the crowd dispersed toward the Prime Quarter Steak House lot. All combatants left the area. At the time of the disturbance, it was closing for bar time and there were no Visions employees monitoring the crowd as it exited and people lingered in the parking lot yelling and screaming. This was the second night Officer Whyte and Officer Michael Martin had to spend approximately 45 minutes monitoring the crowd at Visions to get them to leave. The officers also had to monitor the Prime Quarter parking lot as that is where most of the Visions patrons parked. (Madison Police Case No. 2015-139371.)

31. On August 4, 2015, at approximately 1:06 a.m., Madison Police Officer William

Rentmeester was dispatched to Visions reference a disturbance. Initial information was that there were eight to ten females fighting in the parking lot and in the street in front of Visions. Upon arrival, Officer Rentmeester contacted DeForest Police Officer Christopher Payne, who advised that he had been transporting someone downtown when he saw a group of females fighting in the street. Officer Rentmeester contacted Matt Powers, who was the night closing manager at Visions. Powers stated that a female Hispanic, who was later identified as Laticia D. Morel, was in the bar “yelling” and “running her mouth” most of the night. Powers stated that he told Morel multiple times that she needed to calm down. Powers stated Morel exchanged from words with a black female, later identified as Alesia Stewart. Powers stated Morel walked toward the door, grabbed a glass from a table, and threw it in Stewart’s direction striking Stewart in the head. Powers said he could see blood coming from Stewart’s head. Powers stated that then approximately 10-12 females, including Morel and Stewart, began to fight and the fight spilled out into the parking lot and then into the street. Powers stated that is when Officer Payne from DeForest P.D. came on scene. Officer Rentmeester went to Meriter Hospital around 3:00 a.m. to contact Stewart and learned she had four stiches to close her wound. (Madison Police Case No. 2015-00258276.)

32. On August 15, 2015, at approximately 1:07 a.m., Madison Police Officer William Rentmeester was dispatched to Blackbird Lane reference a sexual assault that had occurred at approximately 11:00 p.m. on August 14, 2015. Officer Rentmeester contacted the victim, identified as AAL, who works as a dancer at Visions. AAL said she was working that night around 11:00 p.m. and walking

around the club speaking to patrons. AAL walked up to a patron she described as a Hispanic male, dark-skinned with thick lips. AAL stated the Hispanic male had dark curly hair that was approximately 3-4 inches long with hair gel in it. He did not have a beard or mustache but had "stubble facial hair." AAL said she asked this Hispanic male a few times throughout the night if he wanted a lap dance, and one of the times she asked him, he said "yes." AAL and the Hispanic male went to the lap dance room, and the Hispanic male paid for two lap dances. AAL said she completed the two lap dances, and the Hispanic male said he wanted a third dance and paid for a third dance. AAL stated that while she was giving the lap dance she was not wearing any clothing and only had on high heels. AAL said the Hispanic male was seated in the lap dance chair and that her feet were on the floor and she had her back to the Hispanic male and he had been kissing on her back and licking her nipples. AAL stated this was common practice at Visions. AAL stated that when the Hispanic male was seated on the chair and she was dancing with her feet on the ground and her back to him he pulled his pants down and pulled his erect penis out of his pants without her knowledge. He then grabbed her hips and pulled her down onto his lap and his penis penetrated her vagina without her consent. AAL stated as soon as she felt his penis in her vagina she jumped up and ran out of the room. She realized she left her purse in the room so she went back and grabbed her purse and ran out again. AAL said when she exited the room she told Dave what happened. Dave stated something to the effect of "he's done that before, and I warned him". AAL said she then saw Dave tell the Hispanic male to leave Visions and he left. AAL stated she had never met the Hispanic male before but believed he

frequented Visions. (Madison Police Case No. 2015-00272845.)

33. On October 2, 2015, at approximately 11:06 p.m., Madison Police Officer Cary House was dispatched to Visions reference a stolen motorcycle from the parking lot. Upon arrival, Officer House contacted the motorcycle owner Gary Nix. Nix stated that he arrived at Visions at approximately 10:15 p.m. and parked his motorcycle in the lot. Nix stated that just prior to 11:00 p.m. he noticed his motorcycle was gone. Nix stated his did not give anyone permission to take his motorcycle. Zachary Reichenberger, who works at Visions, stated he thinks he saw a "chubby" male wearing a black jacket ride off on the bike. Reichenberger said he could not give any further information. (Madison Police Case No. 2015-337074.)
34. On December 18, 2015, at approximately 12:32 a.m., Madison Police Officer Reginald Davis was dispatched to make telephone contact with a subject who lost his wallet at Visions. Officer Davis contacted Tim Neckermann and Neckermann told Officer Davis he arrived at Visions on December 14, 2014, at approximately 10:00 p.m. and exited the business at approximately 1:00 a.m. Neckermann said he remembered using his wallet in Visions at approximately 12:15 a.m. Neckermann said he called Visions the next morning and they advised him nobody had turned in his wallet and that employees had not found a wallet. Neckermann advised he noticed several charges on his Chase credit card. In the early morning hours of December 15, 2015, Neckermann's card was used three times at the Walgreens a block away from Visions for almost \$700 in purchases. (Madison Police Case No. 2015-426665.)
35. On February 8, 2016, at approximately 3:35 a.m., Madison Police Officer Michael

Goodchild was dispatched to Visions for a disturbance. Dispatch advised that an employee was calling to report people fighting in the parking lot. Upon arrival, Officer Goodchild observed the parking lot to be empty. A bouncer, Richard Lyons, came out from inside the bar to speak to Officer Goodchild. Lyons stated that a disturbance broke out during bar close and a gun was pointed at him. While talking to Officer Goodchild, Lyons observed a black male walking on Schmedeman and said, "That's him." Officer Goodchild turned to look at the black male, later identified as Aynom Laine, who took off running across E. Washington Avenue. Officer Wild was arriving on scene at this time, went after Laine, and managed to stop him and handcuff him and place him in his squad car. Lyons stated that at bar close Laine refused to leave and said he was "waiting for his girlfriend." Lyons said he and another bouncer, William Holmes, told Laine to leave at least a dozen times before taking away his drink and escorting him outside. Officer Goodchild asked what Lyons meant by "escorting him outside" and he said they lifted him, each by one arm, and walked him out. Lyons said on the way out Visions Laine was throwing punches, which did not connect, and when they got him to an SUV parked just north of the driveway, the driver of the SUV pulled out a gun, pointed it at Lyons and said, "What's up, what's up, what's up." At that point, Lyons said he was calling police and the SUV sped off. Officer Goodchild went across the street to where Officer Wild had Laine detained. Laine had been yelling the entire time calling the officers names. Officer Goodchild got Laine out of the car, and Laine calmed down and apologized for yelling, screaming, and calling the officers names. Laine admitted to being in the bar but denied any responsibility for a disturbance. Laine said he



knew the man in the car but refused to identify him and said the man would not have a gun. Laine said he ran from police because he was still scared after being in a fight. Laine was issued a Disorderly Conduct citation. (Madison Police Case No. 2016-42308.)

36. On July 6, 2016, at approximately 6:58 p.m., Madison Police Officer Timothy Lupo went to Visions Nightclub for a compliance check. The Madison City Clerk's office had informed Madison Police that Visions was delinquent with their 2015 personal property tax and, as such, did not have a valid liquor license. There was some initial confusion between David Brown and Tom Reichenberger regarding the unpaid tax, but Reichenberger realized that he was responsible for the delinquent personal property tax and agreed to pay it the following morning. Visions closed that evening and agreed to pay their delinquent personal property tax prior to opening for business again. (Madison Police Case No. 2016-233858.)
37. On July 12, 2016, at approximately 1:24 a.m., Madison Police Officers Michael Martin and Luke Leiterman were dispatched to Visions reference a weapons violation. The caller was at the Spence Motel across the street and reported several gunshots from the Visions area. Additional information reported three vehicles leaving the area. The witness, identified as Nicole Johnson, stated she heard a total of four or five rounds fired from a gun. She described the sequence as one, a short pause that was followed by two or three in rapid succession, and then one more. Johnson did not observe any disturbances in the Visions lot after the shots fired. Johnson did see three cars leaving from Schmedeman Avenue onto East Washington Avenue. Officer Martin responded to the area and Officer

Dan Frei, also on scene, located two casings on the eastern side of Schmedeman Avenue. Officer Martin also located one shell casing. All three casings were located between 35 and 45 feet south of Ridgeway Avenue on Schmedeman Avenue. Officer Leiterman was checking the area for anyone else who may have heard the shots and returned to the Visions driveway when he was approached by Richard Lyons, one of Visions bouncers. Lyons told Officer Leiterman that he was outside Visions near the entrance when a black male left his white Lexus in the parking lot and approached an unknown black male near the side of Visions on Schmedeman Avenue. Lyons heard something similar to "I don't play that" and moments later Lyons heard four to five gunshots coming from the intersection of Ridgeway and Schmedeman. Lyons said after the gunshots the black male associated with the white Lexus returned to his vehicle and said something similar to "It's all good, that was just fireworks." Lyons said the man left the scene in the white Lexus and several other people left the area in other vehicles. In a later interview with Madison Detective Greg Luedtke, Lyons said that the black male with the Lexus came into Visions around 10:00 p.m. the night of the shooting. Lyons also said that there were three other black males that came into Visions that night who were associated with the black male's Lexus. Lyons said the black male had made reference to being a "Vice Lord." Lyons turned over the parking lot surveillance video to Detective Luedtke. (Madison Police Case No. 2016-241428.)

38. On July 15, 2016 at approximately 8:42 p.m., several Madison Police Officers were dispatched to Visions reference a battery. Initial information was that a male, later identified as Jason Stendalen, was causing a disturbance inside

Visions. While en route, Dispatch updated and stated he had punched people and was being held down on the floor by his friends. Officer William Rentmeester arrived on scene and noticed Jeremy and Robert Stendalen holding Jason Stendalen in the parking lot. Officer Rentmeester exited his squad, made contact with Jeremy and Robert, and told them to let Jason go, which they did. When Officer Rentmeester first contacted Jason, he could smell a very strong odor of intoxicants coming from Jason. Jason appeared heavily intoxicated but not incapacitated. Jason was sweating profusely and was very animated. Jason kept pointing at bouncer Richard Lyons and saying that Lyons punched him. Jason was bleeding from his head and had a small laceration on the right side of his head above his ear. Jason said Visions employees, including Lyons, accused him of taking photographs with his phone of the female employees working inside Visions. Jason said he had gotten a lap dance or was going to get a lap dance and had his phone out. Jason stated that employees accused him of taking a photo and told him he needed to leave. Jason stated next thing he knew he was being "thrown" through some swinging doors and that he then was thrown to the ground and was kicked. Officer Rentmeester contacted Jason's brother Jeremy. Jeremy said he heard Jason being accused of taking photos and that it appeared employees were attempting to push Jason out of the club. Jeremy stated that Jason was pushed through a swinging door and that a fight broke out between Jason and employees. Jeremy said he believed the employees were the aggressors as they were pushing and shoving Jason and he said multiple employees circled around Jason and that Lyons punched Jason. Officer Rentmeester contacted an individual, identified as Bill Kneebone, who

was a patron in Visions that night that was not associated with the club or the Stendalen family. Kneebone stated that he was standing near Jason when he saw a white flash that he thought was a flash from a camera. Kneebone stated he overheard Lyons say to Jason that he could not take photos and he needed to get rid of the photos and leave the bar. Kneebone stated Jason was going crazy and saying he was going to kill Lyons. Kneebone saw Jason swinging his fists in Lyons' direction. Kneebone said it was a large mêlée between Jason and the employees, and he could not really tell if any employees struck Jason. Jason was issued a citation for Battery. (Madison Police Case No. 2016-00248247)

39. On August 27, 2016, Madison Police Officer Benjamin Schwarz was dispatched to UW Hospital reference a call about a possible drug investigation. Upon arrival to the UW Hospital Emergency Room and made contact with Keila S. Franklin, who is employed as a dancer at Visions. Franklin said she had been working that evening and thought someone may have "slipped something into her drink." Franklin stated she had been working earlier that evening and that at approximately 10:30 p.m. she ordered a Sprite from the bar. Franklin stated that Dave, one of the Owners, poured her the Sprite. Franklin stepped away from the bar for several minutes and when she returned to the bar, she drank some of the Sprite. Franklin said that she then felt "bubbly in her stomach" and "thought I had to poop". Franklin said she became sick and vomited and believe she may have passed out because she later woke up in the lower level private dance rooms and did not know how she got there. Franklin said she was revived by another dancer who goes by the name of "Fire". Franklin stated that after being found by "Fire" she was taken across the street by her friends to the BP

Station and her mother Shanell Colvert was called. Colvert took Franklin to the ER. Franklin said she did not know for certain if something was placed in her drink but that she suspected a rival dancer, known to her as Gigi, may have done it because Gigi had been upset with her and on this evening Gigi no longer seemed upset and that made her think Gigi had done something to her drink. Officer Luke Leiterman responded to Visions on August 18, 2016 at approximately 12:38 a.m. to follow up with manager Dave Brown. Brown said he could not provide any video because their video only covers the entryway and private dance areas. Brown said he did not see anything suspicious that night and that he did not see anyone put anything in Franklin's drink. Brown said he thought Franklin was lying and that he has been in the business for a long time and he thinks Franklin took some drugs on her own. Brown said something similar to "If someone is going to spike someone's drink, it's to take advantage of them, sexually. That didn't happen here, she got sick and her friends had to carry her out." (Madison Police Case No. 2016-293215.)

40. On September 9, 2016 at approximately 2:23 a.m., Dane County Dispatch received a call of a fight in progress from Visions manager Dave Brown reporting approximately 10 people fighting in the parking lot. Brown was reluctant to give any further information and said, "These kinds of people have weapons in their cars." Another call came into dispatch regarding the fight from an individual driving by Visions. (Madison Police Case No. 2016-00322846 )
41. On October 21, 2016 at approximately 1:11 a.m., Madison Police Officers Gabriel Heck and William Rentmeester were dispatched to Visions for a report of a disturbance. Upon arrival at Visions, the Officers made contact with the

caller who was identified as Christian Jackson. Jackson was very intoxicated. His eyes were bloodshot and glassy, his speech was slurred, and he was staggering about. Officer Heck determined that Jackson was upset because he had been involved in a physical altercation inside Visions and as a result, he had received a laceration to the back of his head. Officer Heck could see blood on the back of Jackson's head. Jackson told Officer Heck that he had "seventeen drinks" while inside Visions. Jackson said that during the time he was in Visions there was a man who seemed to have a problem with Jackson. Jackson said shortly after 1:00 a.m. the man who had been looking at Jackson was standing by the entrance door and Jackson decided to approach him, get very close to him, and ask why the other man was looking at him. Jackson said he did just that and the other man said to him, "Hey, man, what is your problem?" The other man then pushed Jackson away from him, and this caused Jackson to fall and hit the back of his head on the edge of a counter when he fell. Officer Heck spoke with Visions owner David Brown and Brown told Officer Heck that Jackson was drunk and had approached another patron aggressively and had slipped and fell when the other patron pushed him slightly to create space. Brown said he wanted Jackson gone because he was causing problems. Madison Fire EMS responded and transported Jackson to St. Mary's Hospital. (Madison Police Case No. 2016-00377497.)

42. On January 19, 2017, at approximately 3:10 a.m., Madison Police Officer Michael Martin was assigned to call an individual named AJM who reported that his girlfriend was pulled on stage at Visions and some of her clothes were removed. Officer Martin made contact with AJM at his residence and then spoke

with his girlfriend, AJD, about what happened at Visions that night. AJD told Officer Martin that they arrived at Visions around 12:15 a.m. or so. They were there with some other friends, were sitting at tables, and had ordered drinks. At one point, AJD got up to use the restroom. While in the restroom AJD was approached by a female stripper, later identified as Niki, who told AJD that AJD's boyfriend was on stage and she should come and watch. AJD said that prior to going into the bathroom she did not know that her boyfriend would be on stage. Niki then grabbed ahold of AJD's wrist and gently pulled her to the stage, up a couple of stairs, and onto the stage. While on the stage, AJD saw AJM already on the stage sitting in a chair that was back-to-back with another chair with a pole between them. AJD states that another stripper bound her hands behind her back. Niki and the other stripper began performing their routine. AJD said the strippers placed their breasts in her face and sat on her several ways. AJD said the strippers rotated once, twice, and then Niki was back to her. At this point, Niki pulled up AJD's shirt over her breasts exposing her black bra. Niki then bent down and was almost face-to-face and very close to AJD. While in this position, Niki grabbed AJD's bra and pulled it up over her nipples exposing them and then Niki touched her breasts to AJD's breasts. AJD stated that at this point she was unable to be free and she said, "What are you doing?" to Niki, who did not respond. After approximately ten seconds or so, Niki pulled her bra back down. AJD stated that while on stage there was a male white about 50 years old with a long ponytail looking at her, saying, and motioning for her to take her clothes off. AJD said she was untied and walked off the stage. AJD estimates she was on stage for five minutes or less. Once off stage, she spoke with AJM

and told him what happened and that she was not happy about it. AJM approached Niki and asked her what happened with AJD, and Niki then said to AJD that she had spoken to her while she was on stage and told her they would do a booby kiss. AJD stated she never heard that from Niki and that the lights were bright and the music was loud. Niki eventually just walked away from AJM and AJD. On January 21, 2017, at approximately 12:45 a.m., Madison Police Officer Michael Martin responded to Visions to follow-up on the complaint from AJD and AJM. Officer Martin made contact with one of the bouncers, Carl Sarbacker. Sarbacker said he had been working the front desk area when a group came into the club around midnight. One of the males in the group stated it was his birthday and he asked Sarbacker if he would get him set up with a couple of strippers and Sarbacker stated he would. Sarbacker recommended Niki and Tabatha. Sarbacker stated that one of the males went up on stage and sat in a chair and another female was brought on stage and she was seated in a chair facing south while the male was in a chair facing north. Sarbacker said during the performance the female guest did not appear uncomfortable and did not stand up and try to leave or yell no or stop. Sarbacker did state that while on stage stripper Niki did pull up the shirt of the female, later identified as AJD, but Sarbacker said he never saw AJD's breasts exposed. Sarbacker did say that AJD was facing away from him while she was on stage. Sarbacker told Officer Martin that AJD and AJM had gone to a private room with Niki for a dance and that there were no issues until he was notified that AJM had taken out a cellphone, which was against Vision's policy. There was a brief disturbance at the door as AJD, AJM, and their friends left; the parties differ as to the reason



for the disturbance. Niki was involved in a similar incident at Visions which is detailed under paragraph 24 of this Complaint. (Madison Police Case No. 2017-0020506.)

43. On February 28, 2017, at approximately 12:52 a.m., Madison Police Officer Stephanie Perez was dispatched to Visions reference a fight. The caller stated there were 3-6 males inside with guns on their hips fighting. The caller said there was going to be "gunfire" soon. Officer Perez arrived at Visions and spoke to the night manager, Matt Powers. Powers confirmed there was nothing going on and all was fine. On March 10, 2017, Madison Police Detective Stachel received information from an anonymous source that said that the incident that took place at Visions on March 28, 2017 was the precipitating event that led to the homicide on March 1, 2017 of CB. The source said that on February 28, 2017, there was an argument at Visions between the boyfriend of a stripper and another male who was disrespecting the stripper. The boyfriend of the stripper was mad that CB had mimicked swiping an ATM card down the stripper's butt crack. The boyfriend of the stripper confronted CB about doing this, and CB made a comment about the girlfriend being a stripper and what do you expect. The source said that CB was killed because of what happened at Visions. Madison detectives followed up with Matt Powers at Visions. Powers had originally told Officers on February 28, 2017 that there had been no disturbance or incident at Visions that night. Powers now detailed to the detectives an incident involving two females and an ensuing disturbance. Detective Stachel asked Powers for the video from February 28, and Powers said that it was password locked, that they needed to call someone to make the video, and he would call Detective

Stachel when it was ready. (Madison Police Case No. 2017-00068104.)

44. On April 10, 2017, at approximately 1:40 a.m., Madison Police Officer Ruben Gonzalez was dispatched to Visions for a threats complaint. Upon arrival, Officer Gonzalez approached two individuals who identified themselves as the callers. The individuals were Julian Villanueva and MN. Villanueva and MN were Spanish speakers, so Officer Gonzalez conducted the interview in Spanish. MN stated that she was leaving work at Visions where she works as a dancer and had not been paid what she thought she should have been paid. MN told Officer Gonzalez that her boss, Dave Brown, requested pictures of her via text message. MN showed Officer Gonzalez her conversation with Brown in which she sent him pictures of herself in which she was not fully dressed. MN pointed out some of the disturbing comments that were her boss's responses. MN said Brown asked for a special dance and was willing to pay for it. MN said she denied the dance since he was her boss and not a client. MN said Brown said something to the effect of, "This is to help you make some money." Officer Gonzalez told MN that if she wanted to pursue a harassment charge she needed to stop sending pictures of herself in lingerie to Brown and inform him that she no longer wants him asking for pictures or contacting her in any sexual manner. MN explained that she would send the pictures to Brown because she was fairly new at the job and she was intimidated by her boss and afraid of losing her job. Officer Gonzalez spoke with Brown and asked him about the sexual harassment complaint from MN. Brown initially denied having contact with MN, but later admitted to having sent her text messages when Officer Gonzalez mentioned he saw the conversations on her cell phone and was able to confirm it was Brown's

cellphone number on MN's phone. Brown then told Officer Gonzalez that many women send him pictures in that manner, referring to his line of work, and explained that many women send him pictures in order to get a job with him or more work. Officer Gonzalez told Brown he should no longer request photos from MN and that she did not want to send him any more photos. (Madison Police Case No. 2017-00117370.)

45. On May 16, 2017, at approximately 12:36 a.m., Madison Police Officer Michael Goodchild was dispatched to the 3500 block of E. Washington Avenue for a report of shots fired. Officer Goodchild contacted Megan Jensen who was outbound in the 3500 block of E. Washington Avenue going to the PDQ when she heard 2 to 3 shots. She saw two men running in the Visions lot but could not say if they were involved. Employees at PDQ and Visions did not hear anything. Nothing was found in a search of the area. On May 17, 2017, Madison Police Detective Richard Friday followed up with the shots fired report from May 16 by obtaining video from Visions. However, Visions had an inaccurate timestamp on the video, which resulted in an incorrect timeframe. The investigation was ongoing. (Madison Police Case No. 2017-00162778.)
46. On May 24, 2017, at approximately 1:10 a.m., Madison Police Officers were dispatched to Visions reference multiple calls for shots fired. Dispatch advised it was unclear if the shots were fired inside the club or outside. Upon arrival, Officers already on scene had found shell casings in the Visions parking lot. Officer Cary House responded to the emergency room and identified Naaman Dorenzo as the individual who had been shot. Naaman told Officer House that he had been at Visions and once he walked outside, he was shot in the leg.

Naaman then stated, "Do your work, I'm not telling you shit. Look at the camera." Officer Jason Baumgart contacted an individual identified as Beau Taylor who had been at the PDQ across the street from Visions when he heard shots fired. Taylor said he was pumping gas when he heard the sound of an argument in the parking lot of Visions. Taylor listened as the argument became more and more intense and then heard what sounded like four to five shots being fired. Taylor then observed individuals running inbound on East Washington Avenue and on Schmedeman. Taylor said it looked like all the people running were black males and females. Officer Michael Goodchild contacted Visions bouncer Matthew Powers. Powers said there were 6 to 8 black males in the parking lot when he heard 4-5 shots fired. Powers said there were no issues in the bar that night. (Madison Police Case No. 2017-00173114)

47. On June 5, 2017, at approximately 5:09 p.m., Madison Police Officer Steven Chvala contacted Thomas Reichenberger, owner of Visions, regarding a recent weapons offense. The purpose of the contact was to obtain general information regarding security for Visions. Reichenberger told Officer Chvala that the front door is staffed by a "bouncer" who checks all identifications of patrons. The business requires a Wisconsin photo ID and has a dress code. According to Reichenberger, the bouncer photographs all identification upon entry. Visions has a private security contract with JBM. JBM patrols the exterior of the building, the immediate parking lot, and the overflow parking lot across the street, which is actually the Pedro's Restaurant parking lot. Reichenberger said that prior to the weapons incident JBM would come through every hour. Reichenberger said since the weapons incident JBM now comes through every half hour.

Reichenberger said he has two security staff in the lot during peak hours of operation and said that security staff wear black shirts with bold white lettering saying "Visions Staff, Security" or something similar. Reichenberger said he would contact Pedro's owner to see if he would post no trespass signs in his lot. (Madison Police Case No. 2017-00190268.)

48. On June 9, 2017, at approximately 10:06 p.m., Madison Police Officer Tieranie De La Rosa was dispatched to Visions for a report of a disagreement. Upon arrival, Officer De La Rosa made contact with an individual identified as Brandi E. Campbell. Campbell stated she started to work at Visions that evening and then decided that she did not want to work there. Campbell approached a bouncer identified as Ian J. Powers and told him she was leaving because she no longer wanted to work there. Powers told her she needed to wait to speak with a manager about leaving. Campbell told Powers she did not want to wait around and she was going to leave. Powers then put his hand on Brandi's stomach telling her she needed to wait for the manager. Powers told her she needed to "tip out" or pay a fee before leaving. Campbell told Powers she did not make any money tonight so she had nothing to give him. Powers followed Campbell to the parking lot telling her she needed to wait for a manager. Powers told Officer De La Rosa that he told Campbell that she had to pay her fee before leaving. Powers said he did not really know what the fee was and that it was between the manager and the dancer. Powers said he thought it had something to do with a stage fee and a DJ fee. Another bouncer told Powers there was nothing they could do and to let Campbell go. Powers then let her go. (Madison Case No. 2017-00196492.)

49. On October 19, 2017, at approximately 11:45 p.m., Madison Police Lieutenant Joey Skenandore was following up on an August 19, 2017 incident at Visions in which a Joshua R. Selsor stated he had been thrown out of Visions and had \$500 in cash stolen in the process. Lt. Skenandore spoke with bouncer Thomas Spoerl. Spoerl said he was working on the night in question and that it was bouncer William Holmes who approached Selsor. Spoerl said that Holmes had Spoerl by the shirt or jacket and dragged him on the floor because Selsor was resisting being removed from the bar. Spoerl stated he knew nothing about Selsor's \$500. Lt. Skenandore also spoke to Holmes, the bouncer who removed Selsor. Holmes told Lt. Skenandore that he did not know anything about some "fucking money" and that he had not done anything. Holmes went on to say that, Selsor was filming one of the female dancers and the female dancer confronted Selsor. It appeared the two were arguing and was getting to the point of being physical, and that is when he intervened. Holmes said, "I tossed him out." Holmes said he dragged Selsor a short distance for just a matter of seconds. Holmes said he knew nothing of the \$500. (Madison Police Case No. 2017-00290807.)
50. On September 6, 2018, at approximately 12:33 a.m., several Madison Police Officers were dispatched to Visions reference a fight that had taken place and an injured person who was possibly unconscious. Officer Michael Martin arrived at Visions and entered the bar and observed approximately eight people around the bar and EMS attending to a male who was standing upon the far side of the bar near the restrooms. The injured man was later identified as Roberto Gonzalez. Officer Dan Frei spoke with an employee of Visions who did not wish

to be identified in the police report. She identified herself to Frei but asked that her name not be in the report. This female told Officer Frei that she was seated at the bar while working when she observed Gonzalez and a female standing at the video game, which allows players to hit a punching bag type device that measures the force of the punch. While Gonzalez and this female were playing, this witness said a black male wearing "biker" attire tried to play the game. There were approximately six individuals wearing the same biker vest with some sort of patches; however, the witness did not know the club name. The witness said they were not CC Riders, Outlaws, or other clubs she has seen in Madison, but she did believe they were local. The witness stated that she believed the black male who approached Gonzalez was of a "higher rank" in the biker club due to the red vest he was wearing and how the other members acted. The witness observed the biker in the red vest stand near Gonzalez, and she heard Gonzalez say to the biker in the red vest that he had to put up his own money or wait until Gonzalez was finished to play the game. The witness said there was some verbal back and forth between the biker in the red vest and Gonzalez and that one of the other bikers tried to calm things down. The female who was with Gonzalez also tried to get between Gonzalez and the biker with the red vest but was unsuccessful. The witness observed the biker in the red vest and Gonzalez get face-to-face when another biker came up behind Gonzalez and grabbed him from behind in a bear-hug type maneuver. At this point, the witness observed the other bikers hit Gonzalez. First, the biker with the red vest hit Gonzalez in the face, and then the others all got involved. The witness stated Gonzalez was taken to the ground, and the suspects began kicking Gonzalez to the point where

he lost consciousness. The bikers continued to kick Gonzalez for a short time, and then the witness and others tried to pull the bikers off Gonzalez. The bikers only stopped when they started telling people that police were coming. The witness said the bikers then left. The witness was afraid of retaliation from the bikers if they learned her name. The witness stated that the biker in the red vest was the aggressor and the one who escalated things. Officer Frei was later advised by other officers that the bikers were with the "Four Horsemen" motorcycle club. There were other witnesses who work for Visions who did not want to be identified for fear of retaliation from the motorcycle club. Follow-up by Terrence Loos, a Madison Police Department Gang Unit officer, led to identification of the five bikers who were at Visions and led to a determination that the Four Horsemen is a nationally recognized motorcycle club and that their behavior is indicative of a criminal gang. (Madison Police Case No. 2018-00347159.)

51. On Thursday, September 27, 2018, at approximately 2:17 a.m., Madison Police Officer Lauren Meverden was dispatched to Visions reference an unconscious male in the parking lot. Upon arrival, Officer Meverden made contact with a male identified as Michael R. Scheets. Scheets stated he fell, hitting his head and that his friends left him. Officer Meverden observed that Scheets had an odor of intoxicants about his person, had slurred speech, and was unable to walk on his own. Madison Fire refused transport, and the Dane County Detox Center was full. Officer Meverden placed Scheets into protective custody. (Madison Police Case No. 2018-00378538.)
52. On October 26, 2018, at approximately 11:27 p.m., Madison Police Officer



Catherine Leerek was dispatched to Visions reference a customer causing a disturbance outside and accusing staff of taking his keys. Upon arrival, Officer Leerek identified the patron as Jeffery M. Wilson. Wilson was upset that staff had his keys to his car. Wilson pointed out that his car was parked in a handicap spot and said he did not realize it was a handicap spot. Wilson said his intention was to go in, have one drink, and then leave and that he left his vehicle running. Wilson stated he ended up staying longer than he expected and when he came out to leave his car was no longer running and the keys were gone from the ignition and it was locked. Wilson went back inside and asked staff if they knew what happened and the manager told him they found his vehicle running in the handicap spot so they turned it off, secured it, and hung onto the keys, which they were refusing to give back the keys until police arrived. Officer Leerek spoke with Troy, the manager, who advised that another staff member found the car outside running in the handicap spot for about an hour. Troy got in the vehicle to turn it off, noticed the title on the front seat, and wrote down the name so he could verify the person's information when they came to get the keys. Troy stated that when Wilson approached him for the keys, Wilson's name did not match the name on the title. Troy also looked up the plate on a license plate website and found the plate did not match the vehicle, so he became suspicious and called police to sort the issue out because he did not feel comfortable returning the keys to Wilson. Officer Leerek was able to verify that the car was Wilson's girlfriend's and that she had purchased the car in May but had not yet registered it and had put her old plates on the vehicle. Wilson was given the keys and told to leave. (Madison Police Case No 2018-00419921.)

53. On December 9, 2018, at approximately
54. On February 18, 2019, at approximately 3:46 p.m., a self-report complaint came into the Madison Police Department. The report stated that the complainant, later identified as Jamie N. McKinney, was at Visions on February 15, 2019 and went into a private room with a dancer going by the name Malibu. According to McKinney, Malibu removed McKinney's hoodie and placed it in the room. As McKinney exited the room and got her things, she noticed her wallet was missing. She went back to the room and had another dancer help her look for her wallet but never found it. On March 2, 2019, Madison Police Officer Samantha Tiry made contact with McKinney. McKinney stated that she was at Visions on February 15, 2019 and that she had been drinking alcohol. She stated that around 12:00 a.m. to 12:30 a.m. she went to the back private room with Malibu and that after the private dance McKinney discovered her wallet missing. McKinney was concerned about her identity being stolen. On March 10, 2019, Officer Tiry called Visions and spoke to an individual identifying themselves as the owner of Visions. Officer Tiry explained to the owner that she was attempting to get video regarding a theft case. The owner immediately became upset and speaking in an angry and defensive tone told Officer Tiry that it had not yet been proven that a theft actually occurred inside Visions. The owner asked Officer Tiry if the victim was an African American "lady", and Officer Tiry stated it was. The owner then said something to the effect of, "that girl was so drunk and she was wasting my time." The owner said he would pass the video request along to his "IT guy" if the IT guy had time. As of March 13, 2019, Officer Tiry had not been contacted by Visions regarding the availability of the

video. (Madison Police Case No. 2019-00900675.)

55. On March 15, 2019, at approximately 11:40 p.m., Madison Police Officer Kevin McCarthy was dispatched to Visions reference a disturbance. Upon arrival, Officer McCarthy observed a group of males standing in the parking lot and asked the group if they had called police. The group indicated “yes.” The group said that one member of the group, Ulises M. Porquillos, had been grabbed from behind by security and escorted out of the bar. He was upset about it because he did not like “being touched by security.” Officer McCarthy made contact with Visions security officer Matthew C. Correia. Correia explained that Porquillos had attempted to touch one of the female employees and that he was “acting drunk.” Correia stated Visions does not allow their employees to be touched by anybody, so he and another security officer placed their hands on Porquillos back in order to escort him out of Visions. Officer McCarthy explain to Porquillos that he was escorted from Visions for failure to follow the rules. Officer McCarthy observed that Porquillos was clearly intoxicated and had issues writing down his name. Porquillos and his friends agreed not to enter Visions again that night and left the parking lot. (Madison Police Case No. 2019-00098383.)
56. On Saturday, June 2, 2019, at approximately 1:48 a.m., Madison Police Officer Kyle Toberman was dispatched to Visions to assist members of Madison Fire Department Station #8 with an individual who was unconscious and not breathing. Upon arrival, Officer Toberman observed members of Madison Fire attending to an unconscious person in the parking lot of Visions. The unconscious person was identified as Christopher M. Dorta. Visions employee Shane T. McElmurry told Officer Toberman that Dorta came into the business

approximately 30 minutes prior with another individual. McElmurry stated something appeared off with Dorta and he thought Dorta would be a problem later on because of Dorta's mannerisms. McElmurry stated that minutes before he contacted emergency services, Dorta was sitting at the bar and had just ordered a beer when he fell out of his chair onto the floor and became unconscious. McElmurry stated he and other employees went to Dorta and noticed his current state and carried Dorta out into the parking lot believing he had just passed out. McElmurry stated that once outside, he noticed that Dorta was not breathing and called emergency services. McElmurry advised he never observed Dorta use any illicit drugs and stated he had only been served a couple of beers. Officer Toberman spoke with an individual identified as Timothy R. Lobianco, an acquaintance of Dorta's. Lobianco stated he and Dorta work together as over the road semi drivers. Lobianco advised that he and Dorta used cocaine prior to coming to Visions, but that they did not use much. Once Dorta regained consciousness, he told Officer Toberman that he sometimes uses cocaine but that he would never use any opiates, including heroin. Dorta stated he was afraid of using opiates. (Madison Police Case No. 2019-00209231.)

57. On June 4, 2019, at approximately 1:40 a.m., Madison Police Officer Kyle Toberman was dispatched to Visions regarding an individual who may be attempting to drive a motor vehicle while intoxicated. Upon arrival, Officer Toberman observed a vehicle parked in the parking lot of Visions. The vehicle was not idling. Officer Toberman made contact with the vehicle's occupant, Carlos D. McEwen. McEwen was seated partially in the vehicle and the key was not in the ignition. McEwen advised he was leaving Visions and admitted to

drinking alcohol beverages. McEwen did emit an odor of intoxicants from his breath, but it was not very strong and his speech was not slurred and his manual dexterity appeared fine. Officer Toberman told McEwen that while he did not appear incapacitated he did suspect he was under the influence of intoxicants and that if he drove he could risk an OMVWI charge. McEwen said his cellphone was dead, so he could not call anyone to come and get him. Officer Toberman was unable to make contact with Visions staff as the business was now closed. Officer Toberman secured McEwen's vehicle and gave him a ride home. (Madison Police Case No. 2019-00212176.)

58. On December 9, 2018, at approximately 1:44 a.m., Madison Police Officer Kyle Toberman was on patrol when he was dispatched to Visions reference a large fight at the establishment. While en route to the business, Dispatch advised that there were now reports of gunshots in the business with at least one possible injury. Upon arrival, Officer Toberman observed numerous individuals walking and running from the business and heard multiple people yelling out loud. As Officer Toberman approached the entrance, he observed what he believed to be fresh blood scattered near the doorframe. Officer Toberman entered Visions at which time he observed numerous patrons inside that were yelling various statements about multiple people being shot by gunfire. Officer Toberman fully entered the business and heard a subject yelling that he had been shot in the leg. A black male and a black female (the female stated she had been grazed by a firearm projectile) were carrying this person, later identified as Justin Madison, and Officer Toberman stopped to provide medical assistance. Officer Toberman was informed that a second victim with a potential gunshot to the

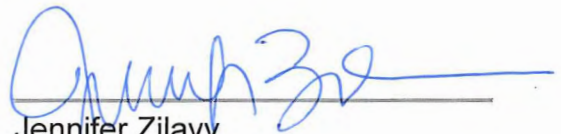
abdomen or chest area had been located in the downstairs area of Visions. During Officer Toberman's initial observations, he saw what appeared to be fresh blood scattered across the floor of the main level of Visions near the south entrance door inside near the service bar. Officer Toberman observed multiple chairs lying on the ground along with clothing on the ground in this area. He also noticed multiple spent firearm casings on the ground. Officer Toberman spoke with a Visions employee identified as Angelique Brown. Brown stated that she overheard a verbal altercation between two men. One of the men was the individual who had been shot and was located downstairs. That man was identified as Dashawn Robert. Brown said Robert was arguing with someone she knew as "Co." Brown stated Co and Robert were arguing loudly with one another near the bar. Brown said as the two were arguing she observed Brown display a small, bi-fold pocketknife in one of his hands. Brown said she then saw one of her co-workers, Miracle Lloyd, walk to Robert and attempt to pull him away. Lloyd and Robert are siblings. Brown stated that Robert and Co continued to argue, and Brown got up to move away from the situation. At this point, Brown saw Co brandish a firearm and fire approximately four rapid shots. Brown stated that Co initially shot at Robert and then Brown, Lloyd, and Robert started running to the nearby staircase. Brown stated that she believed Co fired at least one shot toward the east area of the business. Brown did not know why Robert and Co were arguing. Brown stated that Co is a regular and that he is a drug dealer. Brown stated that Robert also frequents the business. Brown went on to state that she believed Co's first name was Colt and that he had possible affiliations with a motorcycle gang, possibly the CC Riders. Brown stated she

heard Co yelling that he had been stabbed in the head or face area when she initially observed him arguing with Robert. Brown is a dancer at Visions and her stage name is "Sassy." Many Madison Police Officers were on scene in response to the shooting and several detectives were assigned for follow-up investigation. (Madison Police Case No. 2018-00475674.)

NOW, THEREFORE, for all the above stated reasons and pursuant to Sec. 38.10(1), Madison general Ordinances, the Complainant requests that the Common Council of the City of Madison REVOKE the "Class "B" Combination Alcohol Beverage License and the 21+ Entertainment License for the premises known as Visions Nightclub, 3554 East Washington Avenue, Madison, Wisconsin.

Dated this 16<sup>th</sup> day of August 2019.

**CITY OF MADISON**



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