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CITY OF MADISON,

Complainant,

v.

**STIPULATION**

IMPERIAL PALACE, LTD.  
d/b/a BLUEFIN  
1291 Sherman Ave.  
Madison, WI 53704

Respondent.

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It is hereby stipulated and agreed to by the parties to this action:

1. The Respondent, Imperial Palace, Ltd., d/b/a Bluefin (“Bluefin”), by its attorney, Rick Petri, has received a copy of the complaint which has been filed with the City of Madison Clerk’s office in the above-referenced matter and stipulates to service of the Summons and Complaint and the jurisdiction of the ALRC.
2. Bluefin, through its agent Bobby H. Lee, admits to the allegations contained in the subject complaint.
3. Bluefin has agreed to pay a forfeiture to the Madison Municipal Court in the amount of \$1500.00 plus court costs of \$400.00 for a total forfeiture of \$1,900.00.
4. A total of 325 demerit points has been assessed as a result of the Municipal Court action and the plea to ten (10) counts of liquor law violations.
5. Bluefin agrees to a twelve (12) day suspension of its Class B Combination Intoxicating Liquor and Fermented Malt Beverage License and closure of its restaurant for the same twelve (12) day period. The parties have agreed that Bluefin will be able to operate its take-out food operation and its food cart operation during the twelve (12) day liquor license suspension period.
6. The parties propose the following closing dates and times: beginning at 12:01 a.m. on January 7, 2005 and continuing through 8:00 a.m. on January 19, 2005.

7. After Bluefin has served its period of suspension, 325 demerit points will be subtracted from Bluefin's liquor point assessment log in accordance with standard practice and procedure.
8. Bluefin and the City understand that this agreement is merely a proposal and is subject to the approval of the ARLC and the Madison Common Council.

Date: \_\_\_\_\_

\_\_\_\_\_  
Jennifer Zilavy  
Attorney for Complainant

Date: \_\_\_\_\_

\_\_\_\_\_  
Rick Petri  
Attorney for Respondent