UNITED STATES
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FILED
JAN 17 2023

DANE COUNTY CIRCUIT COURT

Robin Thompson

Plaintiff

-VS-

Alisa Davis and Lush Lounge Llc

Defendant

2022CV003211

## **AFFIDAVIT**

- I, Alisa Davis, of Monona, in Dane, Wisconsin, MAKE OATH AND SAY THAT:
- 1. Contingent upon many factors such as; criminal background, financial situation, land lord approval, and approval from the city for alcohol licensing review committee. We discussed going into this venture. Due to the factors stated above we agreed that Robin Thompson was better suited as a Manager, not an owner. Therefore Robin Thompson would receive regular payments. Ms Thompson had no cash investments into Lush Lounge. She has no legal access or rights to any financial information. There was no battery that took place. Please refer to reports in case 22-448623. Robin Thompson was terminated after she was caught stealing cash from Lush Lounge on November 1,2022.
  - 4. The correct address for Lush Lounge is 3765 East Washington ave in the city of Madison. Alisa Davis is the sole registered agent and owner for the business.

- 7. On April 21,2021 Robin Thompson assisted in filing the articles of organization for Lush Lounge she is not a member. Alisa Davis is the sole member for the business. Please refer to stat 183.0102(17).
- 8. On October 1, 2021 Alisa Davis and co signer Vickie Johnston (mother to Davis) went into a 5 year lease agreement with Oakland Properties for 3765 East Washington Avenue in Madison Wi.
- 9. Alisa Davis represents her self in the lease agreement as president and owner of Lush Lounge.
- 10. There is no operational agreement between Thompson and Davis. Any operating agreement provided by Thompson would be considered fraudulent.
- 11. Lush lounge was formed on April 21,2021 it is not a multi member llc Robin Thompson is the organizer which allows her to file paperwork for the business this does not make her a member. Please refer to stat 183.0102(17)
- 12. Thompson did not invest any cash into Lush Lounge.
- 13. Thompson has no legal right to any profits of Lush Lounge.
- 14. Thompson's role of being a manager did not include any accounting.
- 15. Please refer to case 22-448623. This case is now closed.
- 21. On April 21, 2021 Lush Lounge LLC was created. There was no agreements of profit sharing.
- 22. There has been no operating agreement that has been entered at anytime between either parties.
- 25. After Thompson was terminated on November 1, 2022 for inappropriate conduct to fellow employees, theft, indecency to customers, and intoxication Thompson began to make false claims of ownership to Lush Lounge. Prior to being terminated, Thompson never claimed ownership. Please see attached testimonies and video.
- 29. Thompson has made no investments into the company.

- E. Please refer to closed case 22-448623
- VI. Wherefore Davis requests an expedited motion for dismissal.
- 30. Request of dismissal due to closed case 22-448623 case closed due to multiple misleading stories claimed by Ms Thompson.
- 31. Request of dismissal due to fraudulent documents provided by Ms Thompson.
- 32. Request of expedited dismissal due to loss of wages of current employees and prior fellow employees caused by current lawsuit filed by Robin Thompson.
- 33. Request of dismissal due to lack of subject matter.
- 34. Request of expedited dismissal due to fraudulent claims stated by Ms. Thompson causing interference with the ARLC and business operations.

STATE OF WISCONSIN

COUNTY OF DANE

Signature / yle Whan

(Seal)

Court NOTARY PUBLIC

My Commission expires:

91-04-2027

(Signature)

Alisa Davis