

CITY OF MILWAUKEE
LICENSE DIVISION

T. ANTHONY ZIELINSKI
2463 South Superior Street
Milwaukee, Wisconsin 53207

Complaint for Revocation of License

v.

CAMELOT SHOW LOUNGE
2714 S. 13th Street
Milwaukee, Wisconsin

Comes now, T. Anthony Zielinski (“Complainant”), being first duly sworn and upon his oath who respectfully shows and alleges as follows:

1. Complainant is an adult resident of the City and County of Milwaukee, Wisconsin residing at 2463 South Superior Street.
2. Complainant is the Representative for the 14th Aldermanic District in the City of Milwaukee, Wisconsin.
3. That Terry J. Cullen (Licensee) of Camelot Show Lounge is the holder of a Class “B” Tavern and an Amusement Cabaret License for the premises located at 2714 S. 13th Street, Milwaukee, Wisconsin.
4. That on February 20, 2007, the Milwaukee Police Department responded to a battery complaint at the Camelot Show Lounge, 2714 South 13th Street, Milwaukee, Wisconsin. According to Milwaukee Police Department Incident Report #070510196, an investigation revealed there was an argument between two dancers at the Camelot Dance Club, resulting in one stabbing the other inside the tavern. Further, the incident report states that on that same day and immediately following the stabbing incident, another physical altercation arose outside the tavern because one dancer accused another dancer

who was trying to “turn a trick” of “running off” the trick. Complainant believes that the term “trick” refers to an act of prostitution.

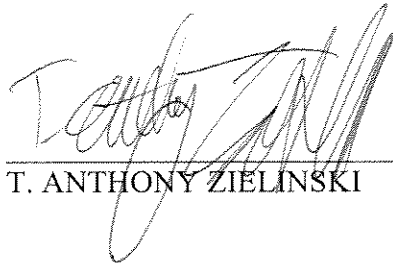
5. That on June 15, 2007, the Milwaukee Police Department conducted an undercover investigation of prostitution at the Camelot Lounge, 2714 S. 13th Street, Milwaukee, Wisconsin. According to the Milwaukee Police Department Incident Report # 071690185, undercover officers entered the Camelot Lounge and were asked to pay a non-posted \$7.00 “cover charge” in violation of Milwaukee City Ordinance § 90-17. After the officers entered the tavern, a dancer performed body gyrations close to an undercover officer and had no coverage on her breasts. The dancer also exposed her anus and vagina to the undercover officer while continuing her body gyrations. The dancer then offered to perform a sexual act with an undercover officer in exchange for money while performing body gyrations close to him. The dancer gave the undercover officer her phone number to arrange a meeting with him. On June 18, 2007, the dancer met the undercover officer at the Hospitality Inn, 4400 S. 27th Street, Milwaukee, Wisconsin, where she offered to perform acts of both non-marital sexual intercourse and sexual gratification with the officer in exchange for \$150.00. The dancer was arrested for Prostitution.

6. That on June 19, 2007, the Milwaukee Police Department continued their investigation of dancers at the Camelot Lounge, 2714 S. 13th Street, Milwaukee, Wisconsin, engaging in prostitution. According the Milwaukee Police Incident Report #071690185, a dancer performing on stage and moving throughout the common areas of the tavern were observed exposing the cleavage of their buttocks and areola of their breasts. As a result of the dancer’s full body exposure, the dancer was arrested and then formally charged with the crime of Lewd and Lascivious Behavior in violation of Wis.

Stat. § 944.20 (1) (b) and Milwaukee City Ordinance. According to the Wisconsin Court Access Website, the dancer pled guilty to Lewd and Lascivious Behavior in Milwaukee Circuit Court.

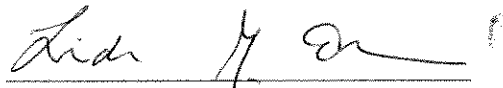
7. Wherefore, your Complainant prays that the Class "B" Tavern and Cabaret License for the premises at 2714 S. 13th Street, Milwaukee, Wisconsin, Camelot Show Lounge, be revoked.

Signed and dated at Milwaukee, Wisconsin this 16th day of October, 2007.



T. ANTHONY ZIELINSKI

The foregoing complaint seeking revocation of the Class "B" Tavern license was subscribed and sworn to before me this 16th day of October, 2007.



Notary Public, State of Wisconsin
My Commission expires: 4/1/10
124669

