

Six Star Holdings, LLC et al vs. City of Milwaukee

2:10-cv-893

Transcript of the Testimony of:

**Michelle**

October 15, 2014



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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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SIX STAR HOLDINGS, LLC  
and FEROL, LLC,

Plaintiffs,

vs.

Case No. 2:10-CV-893

CITY OF MILWAUKEE,

Defendant.

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Deposition of MICHELLE  
Wednesday, October 15th, 2014

12:40 p.m.

at

Zeidler Municipal Building  
841 North Broadway  
Milwaukee, Wisconsin

Reported by Sarah M. Sondag, RPR, RMR, CRR

1                   Deposition of MICHELLE, a witness in the  
2                   above-entitled action, taken at the instance of the  
3                   Defendant, pursuant to the Federal Rules of Civil  
4                   Procedure, pursuant to subpoena, before Sarah M.  
5                   Sondag, Registered Professional Reporter, Registered  
6                   Merit Reporter, Certified Realtime Reporter, and  
7                   Notary Public, State of Wisconsin, at Zeidler  
8                   Municipal Building, 841 North Broadway,  
9                   Milwaukee, Wisconsin, on the 15th day of October,  
10                  2014, commencing at 12:40 p.m. and concluding at 1:18  
11                  p.m.

12                  A P P E A R A N C E S:

13                                 JEFF SCOTT OLSON LAW FIRM, S.C., by  
14                                 Mr. Jeff Scott Olson  
15                                 Ms. Sarah Furey Crandall  
16                                 131 West Wilson Street - Suite 1200  
                                  Madison, Wisconsin 53703  
                                  Appeared on behalf of the Plaintiff.

17                                 CITY ATTORNEY'S OFFICE, by  
18                                 Mr. Adam B. Stephens  
19                                 841 North Broadway  
                                  Milwaukee, Wisconsin 53202  
                                  Appeared on behalf of the Defendant.

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E X A M I N A T I O N

BY MR. STEPHENS

4

E X H I B I T S

(No exhibits were marked.)

R E F E R E N C E D E X H I B I T S

EXHIBIT NO.

PAGE REFERENCED

Exh. 1 Fee schedule

9

Exh. 2 Floor plan diagrams

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TRANSCRIPT OF PROCEEDINGS

MICHELLE, called as a witness herein,  
having been first duly sworn on oath, was examined  
and testified as follows:

EXAMINATION

BY MR. STEPHENS:

Q Okay. Good afternoon, Michelle. My name is Adam  
Stephens. I'm an Assistant City Attorney for the  
City of Milwaukee. We are here today in the 8th  
floor of the Zeidler Municipal Building to conduct a  
deposition. Do you know what a deposition is?

A Sort of.

Q Okay.

A It's, like, for before a case goes to court.

Q Yes. Have you ever been deposed before?

A No.

Q Okay. So by way of explanation, the court reporter  
will be taking down all of the questions that I ask  
you and all of your answers.

A Okay.

Q And, as you know, you've already been sworn to tell  
the truth. Correct?

A Correct.

Q I represent the City of Milwaukee in a lawsuit that's  
been filed in Federal Court.

1 A Okay.

2 Q The other lawyers in the room represent the  
3 plaintiffs in the case and it has to do with an  
4 application in 2010 to open up a couple of taverns  
5 that offered exotic dance entertainment in the  
6 downtown area of Milwaukee. Okay?

7 A I remember that.

8 Q All right. What I am going to be asking about is  
9 that it's my understanding that you have been  
10 employed as an entertainer at some point in time with  
11 the Silk Exotic dance location on Silver Spring Drive  
12 in the City of Milwaukee; is that correct?

13 A Yes.

14 Q Okay. We have agreed, meaning the parties, the  
15 lawyers for the parties, have agreed that in the  
16 depositions of the entertainers so far, that we're  
17 only going to use your stage name.

18 A I don't have a stage name.

19 Q Okay. Well, then you answered that question. You  
20 don't need -- the point of the matter is that we're  
21 not going to ask for you to identify yourself by  
22 name.

23 A Okay.

24 Q Or ask for your address or other contact information.

25 A Okay.

1 Q It's my understanding -- so the City doesn't have  
2 that information.

3 A Okay.

4 Q The lawyers representing the plaintiffs in the case  
5 have gotten that information from Silk.

6 A Well, yeah. I signed a contract when I started  
7 working there.

8 Q Right. So what is -- what is atypical for a  
9 deposition is typically the first things I would ask  
10 is what is your name and where do you work, what is  
11 your address. I'm not going to ask those things.

12 A Okay.

13 Q But I do want to remind you that even though I'm not  
14 asking for that -- those -- that information, you're  
15 still under oath and that you've sworn to tell the  
16 truth.. Okay?

17 A Right. Okay.

18 Q Okay. Part of the issue of the deposition is she --  
19 the court reporter is going to be taking down the  
20 questions and your answers.

21 A Okay.

22 Q So your answers have to be verbal in nature. You  
23 cannot say, "um-hum" or "un-un" --

24 A Okay.

25 Q -- because she can't take that down. We can also

1           only speak one at a time, because she's taking down  
2           everything that's being said. Okay?

3    A    Okay.

4    Q    So if I ask a question over the course of the next 45  
5           minutes or so that is confusing or doesn't make any  
6           sense, please ask me to rephrase it or add more  
7           detail. Okay?

8    A    Okay.

9    Q    I'm going to assume that if you answer the question  
10           that I've asked, that you understand the question and  
11           that you're giving a full answer to that question.  
12           Okay?

13   A    Right.

14   Q    Okay. Having said that, you -- how long have you  
15           worked at the Silk Exotic Silver Spring Drive  
16           location?

17   A    I first started there about a year after they opened.  
18           And over the course of the eight or nine years, I've  
19           been on and off many times, for a total of about five  
20           years total.

21   Q    And when is the last time you performed at Silk?

22   A    It was about three weeks ago.

23   Q    Are you aware that there are other Silk locations in  
24           the state?

25   A    Yes.



1 Q Have you ever worked at any of those locations?

2 A I did work at the Juneau location one time.

3 Q Okay. So from here on out, when I ask questions  
4 about your employment with Silk, your answers are  
5 necessarily going to be just about the Silver Spring  
6 location; right?

7 A Okay. Yes.

8 Q Because that's your --

9 A Yes.

10 Q -- experience; right?

11 A Exactly. Right.

12 Q Okay. In the timeframe when you have worked there,  
13 was there a time where you worked there fairly  
14 consistently?

15 A Yes.

16 Q Would that have been the five-year total that you  
17 were referencing in your last answer?

18 A Yes. Most of the time I would stay for at least six  
19 months to a year at a time.

20 Q And would you have set days that you would work  
21 during the week?

22 A Yes.

23 Q What -- how often did you work?

24 A I worked every Sunday, Monday, Wednesday, and  
25 Thursday.

1 Q I'm sorry. Sunday, Monday --

2 A Wednesday and Thursdays. Night shift.

3 Q All p.m.?

4 A The last time I worked there it was all p.m. I did  
5 work some afternoons about three years ago. But now  
6 my kids are in school, so I can no longer work the  
7 a.m. shift.

8 Q Okay. And those are days that you chose to work?

9 A Yes.

10 Q Silk does not direct you what days you're going to  
11 work?

12 A No.

13 Q Okay. Do you have -- I'm showing you what's marked  
14 as Exhibit No. 1. Are you familiar with this  
15 document?

16 A Yes, I am.

17 Q Okay. This appears to be the schedule -- excuse me.  
18 Strike that.

19 This appears to be the document that  
20 gives entertainers the rates for which they must pay  
21 Silk in order to perform on a certain day or time;  
22 correct?

23 A Correct.

24 Q Okay. And has this been a fairly consist document in  
25 the time you've been there?

1 A It's been the same ever since I started. Yes.

2 Q Okay. And in your experience, does Silk stick with  
3 this fee -- fee structure?

4 A Not always.

5 Q Explain when they don't.

6 A I guess it depends on if a girl has an excuse, a  
7 really good excuse why she can't be there by a  
8 certain time, because she has school or another job,  
9 they will give her a deal. You know, instead of  
10 charging the 53, they will just charge her the 38.

11 Q Okay.

12 A But that would be the only time I would ...

13 Q Typically when are these fees charged?

14 A You're supposed to pay it by midnight of the night  
15 you're working.

16 Q Okay. So you don't have to pay it --

17 A Before you work?

18 Q -- before your shift?

19 A No.

20 Q Okay. Does that always happen though, paying before  
21 midnight?

22 A The only time it doesn't happen is if you're  
23 extremely busy or if you don't make enough to pay it.  
24 And in that case, they will make exceptions and let  
25 you pay it after the club closes. Or if you didn't

1 make enough, they will add it to your -- they have a  
2 tab or whatever in the computer and they will add it  
3 to that.

4 Q So you pay them the next time?

5 A Right.

6 Q Okay. In your experience, is Silk fairly strict on  
7 taking their money --

8 A Yes.

9 Q -- in this vein?

10 A Yes.

11 Q Okay. Now, in the average that you gave earlier, in  
12 the times when you were working fairly regularly on  
13 Sundays, Mondays, Wednesdays, and Thursdays, was  
14 there a certain time that you would come in?

15 A Yes.

16 Q What time?

17 A On Sundays I would get there at 6 and on Mondays,  
18 Wednesdays, and Thursdays I would get there between  
19 7:15 and 7:45, depending what time my husband got  
20 home from work.

21 Q And both times you would work until the facility  
22 closed?

23 A Yes.

24 Q Which is either 2 --

25 A 2 or -- well, I only worked until 2.

1 Q The club closes at 2?

2 A Yeah.

3 Q Because you didn't work Fridays or Saturday nights?

4 A Yeah. I never worked Fridays or Saturdays.

5 Q Was there a reason for that?

6 A I just don't care for the crowd on the weekends.

7 Q It's a bigger crowd?

8 A Yeah. Rowdier.

9 Q Are you familiar with -- or do you belong to a talent  
10 agency or a modeling agency or an entertainment  
11 agency due to your position as an entertainer with  
12 Silk?

13 A No.

14 Q When you first started working for Silk, who did  
15 you -- who did you talk to in terms of getting the  
16 job?

17 A I believe the first person I talked to was Joe, the  
18 house mom.

19 Q Okay. And I'm assuming you filled out some kind of  
20 an application?

21 A Yes.

22 Q Was there anything other than just a basic job  
23 application that you filled out?

24 A No. Not until I was hired. Then I was -- once I was  
25 hired, I filled out the contract.

- 1 Q The contract. Okay.
- 2 A Um-hum.
- 3 Q And what did that contract provide, do you recall?
- 4 A Not exactly. I mean, I didn't read it very
- 5 thoroughly. But it just stated that I am a, like,
- 6 subcontractor. I pay to work there, basically.
- 7 Like, I'm renting my spot there. That's pretty much
- 8 what it said.
- 9 Q Okay.
- 10 A I don't really remember, because it was so long ago..
- 11 I did renew it though, like, a year ago, but I didn't
- 12 re-read it, because I figured it would just be the
- 13 same.
- 14 Q You renewed a year ago?
- 15 A I believe so. About a year. Yeah.
- 16 Q In those nights -- the typical night -- the Sunday,
- 17 Monday, Wednesday, Thursday that you were working on
- 18 a regular basis, approximately how much money would
- 19 you take home in a night?
- 20 A It all depended on who would come in. I myself work
- 21 differently than a lot of other girls. I don't
- 22 hustle for dances. So if I had regulars come in,
- 23 sometimes I would make 200. If I didn't, sometimes I
- 24 would make 50 or \$60. So it was a very wide
- 25 spectrum.

1 Q Over the course of an entire evening?

2 A Right.

3 Q And would that money be after you had already paid  
4 Silk all the necessary fees and rentals?

5 A Yes.

6 Q So that would be the amount of money you would  
7 actually take home?

8 A Um-hum. Yes. Sorry.

9 Q I want to ask a little about how you interacted with  
10 Silk in terms of the exchange of money. Okay?

11 A Okay.

12 Q My understanding is that -- well, tell me what was  
13 the primary way you would get compensated when you  
14 went to work at Silk. How did you make the most  
15 money?

16 A The most money was just from regular customers coming  
17 in and talking to me for hours and they would pay me  
18 for my time to sit there and talk.

19 Q Just in cash?

20 A Yes.

21 Q Okay.

22 A And then also from tip walks.

23 Q What are tip walks?

24 A After you're done dancing your set, you go around the  
25 bar and guys will tip you a dollar, \$2, 3, 5, 10,

1 sometimes.

2 Q Okay. And that's where you would seek most of  
3 your -- or that's where you would receive most of  
4 your money?

5 A That's where I received most of my money.

6 Q Okay. And, actually, can we go off the record for a  
7 second.

8 (A discussion was held off the record.)

9 BY MR. STEPHENS:

10 Q Can you -- you're familiar with -- let me show you  
11 what's been marked as Exhibit No. 2.

12 A Okay.

13 Q Can you -- I can represent to you that that is a  
14 floor plan drawing of the Silk Silver Spring  
15 location. Does that look familiar?

16 A Yes.

17 Q Okay. For example, the bottom left-hand corner is  
18 the main entrance to the facility?

19 A Yeah.

20 Q And you'll see it's marked, "Lobby"?

21 A Yes.

22 Q As you walk into the main entrance into the main area  
23 where the stage is, to the left there are two places  
24 labeled, "Seating." Do you see that there?

25 A Yes.



1 Q Those are -- my understanding, those are the couch  
2 rooms?

3 A Yes, they are.

4 Q Can you describe for me what the process is -- well,  
5 strike that.

6 Have you ever had occasion to work  
7 inside the couch rooms?

8 A Yes.

9 Q Okay. Can you describe how that works?

10 A How the dances work or how do you get the dances?

11 Q Both. Well --

12 A Well --

13 Q Start with how it's arranged.

14 A Let's say you're sitting with a guy and he seems to  
15 like you. You ask him, "Would you care to have a lap  
16 dance?" And if they say yes, then you walk up to the  
17 guy who is standing at the register and the camera --  
18 the screens. They have cameras in all the areas back  
19 there. And then you give him the \$20 for the dance.

20 You go back there and you do a lap  
21 dance. No touching is allowed. And then after the  
22 dance, you get your money and the house gets theirs.

23 Q Do you know what the split is?

24 A Yes. If you work three days or more, you get 15 out  
25 of the 20. If you work less than three days, I

1 believe it's 13 out of the 20.

2 Q Okay. And in your experience, does the money always  
3 go to the cashier before the dance occurs?

4 A The first dance. Yes. If the guy decides to do more  
5 dances, then the bouncer keeps track after each song.  
6 And then afterwards, the guy will pay for the rest of  
7 them, so you don't have to stop after every dance.

8 Q Each time?

9 A Right.

10 Q And the bouncer is the person that's staffing the  
11 cashier?

12 A Yes.

13 Q And you were pointing to Exhibit No. 2 and it's the  
14 little corner between the kitchen?

15 A Right by the kitchen.

16 Q And the seating area?

17 A Yeah. There is a little -- like right here, right by  
18 the kitchen here, there is a little area set up with  
19 a register and screens.

20 Q Okay.

21 A And every area -- actually, not just the lap dances,  
22 but the VIP areas on there, every -- I mean, they can  
23 see everything from over there.

24 Q Has there ever been an occasion in your experience  
25 where an entertainer, whether it's you or someone

1 else, has not paid Silk the fee for the dance?

2 A No.

3 Q Can you -- and then so does the price remain  
4 consistent then for subsequent --

5 A Yes.

6 Q -- lap dances?

7 A Yes. It's \$20 per dance.

8 Q Are you able to charge more or less, if you wanted  
9 to?

10 A No. I don't believe that's allowed.

11 Q Okay. Can you describe for me then how the Champagne  
12 room --

13 A Yes.

14 Q -- works?

15 A Same concept. If you're sitting with a guy and you  
16 feel like he likes you enough to spend \$300 for a  
17 half an hour of a lap dance, then you ask him if he  
18 would like to. And if he says yes, then you walk up  
19 to the VIP and you let the bouncer up there know.

20 Then he escorts you to a specific  
21 room, asks you if you would like anything to drink  
22 and they can either pay cash or credit. Cash is 300.  
23 If they pay credit card, they tack on another \$60.  
24 I'm not even sure why. I never understood that.

25 But same thing. There is no touching

1           allowed. And, actually, you know what, I don't know,  
2           because that was one of my issues with Silk, was the  
3           rules in the Champagne rooms.

4   Q       What do you mean?

5   A       Some bouncers would say you can let them touch you a  
6           little bit on the butt or the breasts a little bit,  
7           and -- but from my understanding, the rules were no  
8           touching allowed. So it was very confusing.

9   Q       Was it the bouncer's obligation to enforce that or  
10          the entertainers?

11   A       It was the bouncer's obligation. I mean, we could  
12          tell a guy not to do something, but I preferred to  
13          let the bouncers take care of it. That way I didn't  
14          look like, you know, whatever, and, you know, he  
15          looked like the bad guy.

16   Q       Right.

17   A       So it didn't affect my money.

18   Q       Your tips?

19   A       Exactly.

20   Q       Right. Okay. But some bouncers would allow the  
21          customers to touch?

22   A       A little bit. Yes.

23   Q       Was there any rhyme or reason for which dancers or  
24          which customers?

25   A       I believe certain dancers that got more Champagne

- 1 rooms were probably allowed to do more things.
- 2 Q Meaning they were bringing in more money?
- 3 A Exactly.
- 4 Q And so because they were earning more money in the  
5 Champagne rooms, they were permitted to be more --  
6 what?
- 7 A Lax with the rules.
- 8 Q Lax with the rules. And the "rule" meaning the  
9 customers were allowed to touch the dancers?
- 10 A Right.
- 11 Q Either on the buttocks or breast area?
- 12 A Right.
- 13 Q How -- how regular was that?
- 14 A I'm not sure, because I was not up there very often.
- 15 Q Okay.
- 16 A I didn't do a lot of Champagne rooms, so I don't know  
17 how often that happened. I don't think it was a lot,  
18 but I think there are certain girls there that -- it  
19 depends on the bouncer. It depends on the customer.  
20 It depends on if Jon and Craig are there, because Jon  
21 and Craig would not have that, you know.
- 22 Q Okay. So if Jon and Craig were not there, it might  
23 be more likely that that would happen?
- 24 A Exactly. Jon and Craig would not allow that.
- 25 Q Do you think the dancers who would allow the touching

- 1           would also tip, perhaps, the bouncers?
- 2    A       Yes, they would. They would tip them a lot to let
- 3           them get away with more.
- 4    Q       How much?
- 5    A       I don't know.
- 6    Q       Okay.
- 7    A       I'm guessing probably at least 80 to \$100.
- 8    Q       What's the share cut when you get one Champagne room?
- 9    A       Out of the 300, you keep -- the dancer keeps 200 and
- 10           the house keeps 100.
- 11   Q       So if the dancer had multiple "rentals," if you will?
- 12   A       Yes.
- 13   Q       Is that the right term or what's the term?
- 14   A       It's per half hour.
- 15   Q       Per half hour. So if you had multiple half hours,
- 16           the dancers would be keeping two-thirds of the money;
- 17           right?
- 18   A       Yes.
- 19   Q       And then, presumably, if the customer was spending
- 20           that much more money, the dancer would have more
- 21           money to share with the bouncers?
- 22   A       Correct.
- 23   Q       Okay. Was there ever an occasion where the dancers
- 24           would not want the touching and the bouncer would
- 25           say -- would allow it to happen?

- 1 A I don't think so.
- 2 Q No?
- 3 A No. I think if a girl didn't want it to happen, the  
4 bouncer would stop it.
- 5 Q Right.
- 6 A Yeah.
- 7 Q But you suspect that some bouncers would look the  
8 other way because they would receive extra tips?
- 9 A Right.
- 10 Q And presumably they would get the extra tips because  
11 the dancers were making extra money?
- 12 A Yes.
- 13 Q Because the dancers were performing extra --
- 14 A Yes.
- 15 Q -- activities?
- 16 A And those bouncers also would set the customers up  
17 with the girls who they knew were going to tip them  
18 extra.
- 19 Q I see. So the customers who were more inclined to be  
20 paying money over the course of an evening, the  
21 bouncers would direct them to certain dancers?
- 22 A Exactly. They would -- they would go in the back  
23 room and tell the girl, "Hey, there is a guy out  
24 there. He just walked in. He's got a wallet full of  
25 100s. Go talk to him."

1 Q Okay. Was there a word for that? Was there a code  
2 or something like that?

3 A No.

4 Q It just was, "There is a guy with a wad of 100s"?

5 A Yeah. Yeah.

6 Q Okay.

7 A Nobody tried to hide it.

8 Q Right. Now, in those -- you indicated you didn't  
9 typically do the Champagne room; right?

10 A I did very few over the years that I worked there.

11 Q On an average night, approximately how many times  
12 would you have been paid for a couch dance or lap  
13 dance?

14 A It depended on the night. Some nights I did not do  
15 any. Some nights I would do 10 to 15.

16 Q Okay. And then the Champagne rooms were --

17 A I would just do maybe one every few months.

18 Q Okay. Did you ever make any purchases inside the  
19 Silk store in the boutique?

20 A Yes.

21 Q How often?

22 A Pretty often. At least once or twice a month I would  
23 buy an outfit.

24 Q Okay. You would buy an outfit or clothing?

25 A Um-hum. Yes.



- 1 Q Okay: Is that it?
- 2 A I bought shoes. But what else do they sell?
- 3 Q I don't know.
- 4 A Shoes and clothes.
- 5 Q Approximately how much would you spend?
- 6 A Most of the outfits were between 35 and \$60 each.
- 7 The shoes are, like, 65 to 69.
- 8 Q And you would do that how often?
- 9 A Once or twice a month.
- 10 Q Okay. Did you ever have a business relationship
- 11 outside of your entertainment position with any of
- 12 the management or other employees of Silk?
- 13 A No.
- 14 Q Did you ever socialize with any of them?
- 15 A No. I don't have time to socialize.
- 16 Q Fair enough.
- 17 A I have children.
- 18 Q Fair enough. Based on your experience in how the
- 19 Champagne room works, how -- my understanding is you
- 20 would get your share of the Champagne room after the
- 21 half hour was over?
- 22 A No. You would have to wait until the bar closed.
- 23 Q To get your portion?
- 24 A Yes.
- 25 Q So you would have to trust the cashier to --

- 1 A Yes.
- 2 Q -- keep track of how many times you've rented?
- 3 A Yes.
- 4 Q That's different than the tips you would get from  
5 being on stage; right?
- 6 A Yes.
- 7 Q Or walking around?
- 8 A Right.
- 9 Q Or the couch room?
- 10 A Exactly.
- 11 Q In your experience, did you feel confident that Silk  
12 was keeping good track of the rentals of the  
13 Champagne room?
- 14 A Yes.
- 15 Q Meaning their financial records, their cashier  
16 register records, were good?
- 17 A Yes.
- 18 Q You didn't ever feel like they short-changed you or  
19 anything like that?
- 20 A No.
- 21 Q When -- did you receive any kind of training when you  
22 first started working there, or since you've worked  
23 there, about how to do your job or do it better or  
24 make more money?
- 25 A No. They never trained. I've never seen them train

- 1 anybody.
- 2 Q So if somebody was to start, they would just --
- 3 A Yeah.
- 4 Q -- go do it?
- 5 A Throw them out there.
- 6 Q Okay.
- 7 A I have actually asked management, you know, how can I  
8 talk to a guy to get him in the Champagne room and  
9 sell it, when I don't even think it's worth \$300, you  
10 know what I mean.
- 11 Q What was their response?
- 12 A "Well, just, you know, tell them, you know, it's more  
13 intimate and we can, you know -- I can give you a  
14 back rub and it's private. It's more intimate."  
15 That was their favorite response. "It's more  
16 intimate." Yeah. But really it's not anything more  
17 than a lap dance.
- 18 Q Now, based on that answer, it would be appropriate  
19 for a dancer to touch a customer?
- 20 A Yes.
- 21 Q But it's not appropriate for a customer to touch a  
22 dancer?
- 23 A Correct.
- 24 Q Can you -- in your experience, how many of the  
25 customers that you would engage with drink alcohol

1 when they're there?

2 A Probably 90 percent.

3 Q And is that something you would notice particularly  
4 or just consistent?

5 A I don't think I really paid attention. I did notice  
6 there were certain customers that didn't drink  
7 alcohol and I would notice that. They would always  
8 drink either water or soda.

9 Q And that was unusual to you?

10 A Yes.

11 Q Okay. Do you have any experience with people who  
12 would come to the premises intoxicated already?

13 A No. Very rarely. I've seen it happen, but not very  
14 often.

15 Q Okay. So most of the time in your experience --  
16 again, I don't want to put words in your mouth --  
17 90 percent of the people that you interacted with  
18 were drinking some form of alcohol --

19 A Yes.

20 Q -- while they were at the premises?

21 A Yes. But I wouldn't say that they seemed intoxicated  
22 though.

23 Q Okay.

24 A And they always had a line of cabs waiting outside,  
25 in case anybody needed a ride.

1 Q Silk always arranged for that?

2 A Yeah. Silk had -- I mean, they didn't pay for it,  
3 but they always had cabs waiting in case somebody  
4 needed one. Because if it's already there, they're  
5 more likely to just jump in, rather than having to  
6 call and wait 15 minutes, you know.

7 Q Right. Now, at the end of the night, the nights you  
8 usually would work, it would be around approximately  
9 2 a.m.; right?

10 A Yes.

11 Q Was there ever an exchange between you and Silk or  
12 the management of cash or money at that point in  
13 time?

14 A No. Other than paying -- like, tipping the house  
15 dad.

16 Q Okay. You would pay -- you would tip him though?

17 A Yeah.

18 Q But you weren't obligated to do that?

19 A No. The only person you're obligated to tip is the  
20 DJ.

21 Q How much are you obligated to tip?

22 A A minimum of \$10, which doesn't make it a tip, if  
23 it's obligated.

24 Q Right. So that's just another fee; right?

25 A They call it a "tip," but it's a fee.

1 Q Okay. So at the end of the night or by midnight, you  
2 needed to pay your stage fee; right?

3 A Yes.

4 Q And by the end of the night, you have to pay the DJ's  
5 tip?

6 A The DJ.

7 Q And why would you give a tip to the house dad or mom?

8 A Just because they kind of look out for us. If we  
9 need something -- like, say a girl needed a tampon,  
10 they would run to the store and buy them out of their  
11 own pocket money.

12 Q Okay.

13 A Sometimes they would bring snacks in out of their own  
14 pocket money. They were just very nice to us.

15 Q So you would --

16 A Most people tipped them. Yeah.

17 Q And what about the bouncers, was that --

18 A I never tipped the bouncers, because I never thought  
19 they did anything for me. Some girls did tip the  
20 bouncers. I would tip the lap dance bouncer after  
21 each dance I did.

22 Q The lap dance bouncer, meaning the cashier?

23 A Right. After each dance, I would tip him a dollar  
24 per dance.

25 Q Why?

- 1 A Just because it was expected.
- 2 Q Okay.
- 3 A I mean, because he's -- he's watching the screens and  
4 making sure nothing is happening to you back there.
- 5 Q Right.
- 6 A So ...
- 7 Q Okay. So that was -- but then you wouldn't share --  
8 okay. So there is that.
- 9 And then you would have already  
10 pre-paid the couch money to Silk --
- 11 A Yes.
- 12 Q -- when you -- when you entered the couch room?
- 13 A Right.
- 14 Q And then the Champagne room is also pre-paid via  
15 credit card; right?
- 16 A Or cash.
- 17 Q Or cash?
- 18 A Yes.
- 19 Q And then you don't get that money -- I thought you  
20 said that you got that money at the end of the night?
- 21 A After closing. Yes.
- 22 Q Okay. Other than that exchange, did -- I mean, did  
23 you share any of your tips that you made with Silk in  
24 any other way?
- 25 A No.

- 1 Q Or any of the management?
- 2 A No.
- 3 Q Okay.
- 4 A Maybe that's why the management didn't like me.
- 5 Q Well, you indicated earlier that you no longer work  
6 there; right?
- 7 A Right.
- 8 Q Can you tell me about that?
- 9 A I just don't like the manager.
- 10 Q Which -- who is that?
- 11 A Perry.
- 12 Q Perry. Okay. How long has Perry been there?
- 13 A He's been there for years. He was a bartender and  
14 then he became manager a couple years ago, a few  
15 years ago. And he's just got this ego. I don't  
16 know. He's just on a power trip.
- 17 Q Okay.
- 18 A He's just not very nice anymore.
- 19 Q In what way? I mean, just in --
- 20 A I believe he's inappropriate, to be honest. He came  
21 back -- there was a girl who was drunk and had her  
22 phone stolen and Perry came back and called everybody  
23 in the room, he said, "You're all a bunch of fucking  
24 thieves," which I took very personally, because not  
25 everybody that dances is a thief. I mean, he really



1 was out of line with that one and that is the kind of  
2 attitude he had.

3 Q So his interpersonal skills with the entertainers was  
4 not very good?

5 A Not very --

6 Q At least with you?

7 A Not very good with me or a lot of the other girls.  
8 He was really rude to a lot of girls.

9 Q In his tone of voice?

10 A Tone of voice. The things he said.

11 Q Name calling?

12 A Name calling.

13 Q Insults?

14 A Insults.

15 Q Anything else?

16 A Belittling, you know. Like, you think I'm stupid,  
17 you know, like -- just -- he's not nice.

18 Q Did he direct any of his negative attention directly  
19 to you at any point or was this just generally to the  
20 entertainers that he was speaking to?

21 A Well, to me. Yes. To me and to other girls. And  
22 sometimes just to the room in general, if he was in a  
23 bad mood.

24 Q Okay. Besides Perry, were there any other negative  
25 experiences that you've had at Silk?

1 A No. No.

2 Q Okay.

3 A Oh, wait. Like years ago when -- before Perry was  
4 the manager, there was a guy named Mark or Matt --  
5 Matt was the manager. Both of my kids had to go to  
6 the ER. My husband, he's a good dad, but he couldn't  
7 handle that by himself and so I had to leave. And I  
8 hadn't made even \$50 yet and Matt told me I couldn't  
9 leave unless I paid \$100.

10 Q Is that the early leave fee or something?

11 A Yeah. So I told him, I'm like, "I'm sorry, but I'm a  
12 mom before I'm a stripper, so if you have to fire me,  
13 go ahead." And Joe --

14 Q But they didn't fire you?

15 A No. Because Joe and Scott, the house mom and dad,  
16 told him, "She's not a problem girl. Like, she  
17 comes, does her job, and doesn't cause any problems.  
18 Her kids are sick. She has to go." So they saved my  
19 job.

20 Q Okay.

21 A But I got snotty with him, so he didn't like that.  
22 But, no, other than that -- like, Craig and -- Craig  
23 is so nice. Jon I haven't really talked to. There  
24 is another owner, Joe. He's also super nice. I  
25 haven't had any bad experiences with any of the

1 owners.

2 Q Okay. So as we're -- I think we're close to done.

3 A Okay.

4 Q But as I mentioned before, the City of Milwaukee does  
5 not have any of your personal information, your name  
6 or your address or anything like that.

7 A Okay.

8 Q Okay. There may come a time where you're needed for  
9 court.

10 A Okay.

11 Q And what I would ask that you do is that if you move  
12 or you, you know, have -- your contact information,  
13 your email, your phone number, your address, changes,  
14 that you contact the Jeff Scott Olson Law Firm --

15 A Okay.

16 Q -- and let them know, so we can find you. Is that  
17 okay?

18 A Yes.

19 Q Okay. Do you recall when you got served with the  
20 subpoena for today?

21 A I have it written down. October 14th. Oh, wait.  
22 No. That's not right. It was a couple weeks ago.

23 Q Okay. Have you spoken to anybody about that  
24 subpoena?

25 A No.

- 1 Q No one?
- 2 A Well, my husband.
- 3 Q Okay.
- 4 A But other than that, no.
- 5 Q Other than -- and you just told him you were  
6 subpoenaed?
- 7 A Yeah. Well, he actually told me, because I wasn't  
8 home when the guy came the first time. So I called  
9 him and then he came back.
- 10 Q The process server?
- 11 A It was literally a couple days after I quit that he  
12 came with this.
- 13 Q Okay. Have you spoken to anybody at Silk --
- 14 A No.
- 15 Q -- about the subpoena?
- 16 A Nope.
- 17 Q Okay.
- 18 A I don't talk to any of the other dancers or anybody.
- 19 Q You have no contact, other than just going on certain  
20 shifts?
- 21 A Right.
- 22 Q Okay. Are the entertainers -- do the entertainers  
23 drink alcohol?
- 24 A Some do. Yes.
- 25 Q Do you have a percentage? I'm sorry. Let me make it

1 clear.

2 Do they drink alcohol while they're  
3 working?

4 A Yes.

5 Q Okay. Do you have a percentage of how many that is?

6 A At least half. And that's only because a lot of the  
7 girls are under 21. The girls that are over 21,  
8 probably 80 percent.

9 Q Drink while they're working?

10 A Yes.

11 Q Do you know why they do that?

12 A Because it's a bar and there is alcohol there and --  
13 I mean, one of our jobs is to make money for the bar,  
14 so when -- you know, you try to get guys to buy you  
15 things.

16 Q Right.

17 A Yeah.

18 Q And that's part of the routine of --

19 A Yeah.

20 Q -- sitting with somebody and talking to them?

21 A Right.

22 Q And that's a normal exchange, meaning I'll buy you a  
23 drink and I'll sit with you?

24 A Yes.

25 Q And -- because you don't get any of the proceeds of

1 the alcohol sales?

2 A No, you don't.

3 Q So if the person --

4 A You're hoping you can chat them up and get them into  
5 that lap dance area.

6 Q Or they would at least just give you a tip for your  
7 time?

8 A Right. Um-hum.

9 MR. STEPHENS: Okay. I don't have any  
10 further questions. Thank you.

11 THE WITNESS: Okay.

12 MR. OLSON: Thanks for coming.

13 THE WITNESS: Do you have any questions?

14 MR. OLSON: No.

15 (Deposition concluded at 1:18 p.m.)

16 (No exhibits were marked.)

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WORD INDEX

&lt;\$&gt;

\$10 28:22  
 \$100 21:7 33:9  
 \$2 14:25  
 \$20 16:19 18:7  
 \$300 18:16 26:9  
 \$50 33:8  
 \$60 13:24 18:23 24:6

&lt;1&gt;

1 3:7 9:14  
 1:18 2:10 37:15  
 10 14:25 23:15  
 100 21:10  
 100s 22:25 23:4  
 12:40 1:13 2:10 38:12  
 1200 2:15  
 12th 38:23  
 13 17:1  
 131 2:15  
 14th 34:21  
 15 3:9 16:24 23:15  
 28:6  
 15th 1:13 2:9 38:12

&lt;2&gt;

2 3:9 11:24, 25, 25  
 12:1 15:11 17:13 28:9  
 2:10-CV-893 1:6  
 20 16:25 17:1  
 200 13:23 21:9  
 2010 5:4  
 2014 1:13 2:10 38:12,  
 20  
 2018 38:23  
 21 36:7, 7  
 23rd 38:20

&lt;3&gt;

3 14:25  
 300 18:22 21:9  
 35 24:6  
 38 10:10

&lt;4&gt;

4 3:2  
 45 7:4

&lt;5&gt;

5 14:25  
 50 13:24  
 53 10:10  
 53202 2:19  
 53703 2:15

&lt;6&gt;

6 11:17  
 65 24:7  
 69 24:7

&lt;7&gt;

7:15 11:19  
 7:45 11:19

&lt;8&gt;

80 21:7 36:8  
 841 1:17 2:8, 18 38:10  
 8th 4:9

&lt;9&gt;

9 3:7  
 90 27:2, 17

&lt;A&gt;

a.m 9:7 28:9  
 able 18:8  
 above-entitled 2:2  
 action 2:2 38:17  
 activities 22:15  
 Adam 2:18 4:7  
 add 7:6 11:1, 2  
 address 5:24 6:11 34:6,  
 13  
 affect 19:17  
 affixed 38:19  
 afternoon 4:7  
 afternoons 9:5  
 agency 12:10, 10, 11  
 ago 7:22 9:5 13:10, 11,  
 14 31:14, 15 33:3 34:22  
 agreed 5:14, 15  
 ahead 33:13  
 alcohol 26:25 27:7, 18  
 35:23 36:2, 12 37:1  
 allow 19:20 20:24, 25  
 21:25  
 allowed 16:21 18:10  
 19:1, 8 20:1, 9  
 amount 14:6  
 answer 7:9, 11 8:17  
 26:18  
 answered 5:19  
 answers 4:19 6:20, 22  
 8:4  
 anybody 26:1 27:25  
 34:23 35:13, 18  
 anymore 31:18  
 Appeared 2:16, 19  
 appears 9:17, 19  
 application 5:4 12:20,  
 23  
 appropriate 26:18, 21  
 approximately 13:18  
 23:11 24:5 28:8  
 area 5:6 15:22 17:16,  
 18, 21 20:11 37:5  
 areas 16:18 17:22  
 arranged 16:13 28:1  
 asked 7:10 26:7  
 asking 5:8 6:14  
 asks 18:21  
 Assistant 4:8

assume 7:9

assuming 12:19  
 attention 27:5 32:18  
 attitude 32:2  
 Attorney 4:8 38:14, 16  
 ATTORNEY'S 2:16  
 atypical 6:8  
 average 11:11 23:11  
 aware 7:23

&lt;B&gt;

back 16:18, 20 22:22  
 26:14 30:4 31:21, 22  
 35:9  
 bad 19:15 32:23 33:25  
 bar 14:25 24:22 36:12,  
 13  
 bartender 31:13  
 Based 24:18 26:18  
 basic 12:22  
 basically 13:6  
 basis 13:18  
 behalf 2:16, 19  
 believe 12:17 13:15  
 17:1 18:10 19:25 31:20  
 Belittling 32:16  
 belong 12:9  
 better 25:23  
 bigger 12:7  
 bit 19:6, 6, 22  
 bottom 15:17  
 bought 24:2  
 bouncer 17:5, 10 18:19  
 20:19 21:24 22:4  
 29:20, 22  
 bouncers 19:5, 13, 20  
 21:1, 21 22:7, 16, 21  
 29:17, 18, 20  
 bouncer's 19:9, 11  
 boutique 23:19  
 breast 20:11  
 breasts 19:6  
 bring 29:13  
 bringing 20:2  
 Broadway 1:17 2:8, 18  
 38:11  
 Building 1:13 2:8 4:10  
 38:10  
 bunch 31:23  
 business 24:10  
 busy 10:23  
 butt 19:6  
 buttocks 20:11  
 buy 23:23, 24 29:10  
 36:14, 22

&lt;C&gt;

cabs 27:24 28:3  
 call 28:6, 25  
 called 4:2 31:22 35:8  
 calling 32:11, 12  
 camera 16:17

cameras 16:18  
 card 18:23 30:15  
 care 12:6 16:15 19:13  
 Case 1:6 4:14 5:3 6:4  
 10:24 27:25 28:3  
 cash 14:19 18:22, 22  
 28:12 30:16, 17  
 cashier 17:3, 11 24:25  
 25:15 29:22  
 cause 33:17  
 certain 9:21 10:8  
 11:14 19:25 20:18  
 22:21 27:6 35:19  
 Certified 2:6  
 certify 38:6, 9, 13  
 Champagne 18:11 19:3,  
 25 20:5, 16 21:8 23:9,  
 16 24:19, 20 25:13  
 26:8 30:14  
 changes 34:13  
 charge 10:10 18:8  
 charged 10:13  
 charging 10:10  
 chat 37:4  
 children 24:17  
 chose 9:8  
 CITY 1:7 2:16 4:8, 9,  
 24 5:12 6:1 34:4  
 Civil 2:3  
 clear 36:1  
 close 34:2  
 closed 11:22 24:22  
 closes 10:25 12:1  
 closing 30:21  
 clothes 24:4  
 clothing 23:24  
 club 10:25 12:1  
 code 23:1  
 come 11:14 13:20, 22  
 27:12 34:8  
 comes 33:17  
 coming 14:16 37:12  
 commencing 2:10 38:12  
 commission 38:23  
 compensated 14:13  
 computer 11:2  
 concept 18:15  
 concluded 37:15  
 concluding 2:10  
 conduct 4:10  
 confident 25:11  
 confusing 7:5 19:8  
 consist 9:24  
 consistent 18:4 27:4  
 consistently 8:14  
 contact 5:24 34:12, 14  
 35:19  
 contract 6:6 12:25  
 13:1, 3  
 corner 15:17 17:14  
 Correct 4:22, 23 5:12  
 9:22, 23 21:22 26:23



couch 16:1, 7 23:12  
25:9 30:10, 12  
counsel 38:14, 16  
COUNTY 38:2  
couple 5:4 31:14 34:22  
35:11  
course 7:4, 18 14:1  
22:20  
COURT 1:1 4:14, 17,  
25 6:19 34:9  
Craig 20:20, 21, 22, 24  
33:22, 22  
Crandall 2:14  
credit 18:22, 23 30:15  
crowd 12:6, 7  
CRR 1:25 38:4, 23  
customer 20:19 21:19  
26:19, 21  
customers 14:16 19:21,  
24 20:9 22:16, 19  
26:25 27:6  
cut 21:8

<D>  
dad 28:15 29:7 33:6, 15  
dance 5:5, 11 16:16, 19,  
21, 22 17:3, 4, 7 18:1, 7,  
17 23:12, 13 26:17  
29:20, 21, 22, 23, 24 37:5  
dancer 21:9, 11, 20  
26:19, 22  
dancers 19:23, 25 20:9,  
25 21:16, 23 22:11, 13,  
21 35:18  
dances 13:22 16:10, 10  
17:5, 21 18:6 31:25  
dancing 14:24  
day 2:9 9:21 38:12, 20  
days 8:20 9:8, 10 16:24,  
25 35:11  
deal 10:9  
decides 17:4  
Defendant 1:8 2:3, 19  
depended 13:20 23:14  
depending 11:19  
depends 10:6 20:19, 19,  
20  
deposed 4:15  
Deposition 1:12 2:1  
4:11, 11 6:9, 18 37:15  
38:6, 9  
depositions 5:16  
describe 16:4, 9 18:11  
detail 7:7  
diagrams 3:9  
different 25:4  
differently 13:21  
direct 9:10 22:21 32:18  
direction 38:8  
directly 32:18 38:17  
discussion 15:8  
DISTRICT 1:1, 2

DJ 28:20 29:6  
DJ's 29:4  
document 9:15, 19, 24  
dollar 14:25 29:23  
downtown 5:6  
drawing 15:14  
drink 18:21 26:25 27:6,  
8 35:23 36:2, 9, 23  
drinking 27:18  
Drive 5:11 7:15  
drunk 31:21  
due 12:11  
duly 4:3

<E>  
earlier 11:11 31:5  
early 33:10  
earning 20:4  
EASTERN 1:2  
ego 31:15  
eight 7:18  
either 11:24 18:22  
20:11 27:8  
email 34:13  
employed 5:10  
employee 38:14, 15  
employees 24:12  
employment 8:4  
enforce 19:9  
engage 26:25  
entered 30:12  
entertainer 5:10 12:11  
17:25  
entertainers 5:16 9:20  
19:10 32:3, 20 35:22, 22  
entertainment 5:5  
12:10 24:11  
entire 14:1  
entrance 15:18, 22  
ER 33:6  
escorts 18:20  
evening 14:1 22:20  
everybody 31:22, 25  
Exactly 8:11 13:4  
19:19 20:3, 24 22:22  
25:10  
EXAMINATION 4:5  
examined 4:3  
example 15:17  
exceptions 10:24  
exchange 14:10 28:11  
30:22 36:22  
excuse 9:17 10:6, 7  
Exh 3:7, 9  
EXHIBIT 3:7 9:14  
15:11 17:13  
exhibits 3:2 37:16  
exotic 5:5, 11 7:15  
expected 30:1  
experience 8:10 10:2  
11:6 17:2, 24 24:18  
25:11 26:24 27:11, 15

experiences 32:25 33:25  
expires 38:23  
Explain 10:5  
explanation 4:17  
extra 22:8, 10, 11, 13, 18  
extremely 10:23

<F>  
facility 11:21 15:18  
Fair 24:16, 18  
fairly 8:13 9:24 11:6,  
12  
familiar 9:14 12:9  
15:10, 15  
far 5:16  
favorite 26:15  
Federal 2:3 4:25  
Fee 3:7 10:3, 3 18:1  
28:24, 25 29:2 33:10  
feel 18:16 25:11, 18  
fees 10:13 14:4  
FEROL 1:4  
figured 13:12  
filed 4:25  
filled 12:19, 23, 25  
financial 25:15  
financially 38:16  
find 34:16  
fire 33:12, 14  
FIRM 2:12 34:14  
first 4:3 6:9 7:17  
12:14, 17 17:4 25:22  
35:8  
five 7:19  
five-year 8:16  
Floor 3:9 4:10 15:14  
follows 4:4  
form 27:18  
Fridays 12:3, 4  
fucking 31:23  
full 7:11 22:24  
Furey 2:14  
further 37:10 38:9, 13

<G>  
general 32:22  
generally 32:19  
getting 12:15  
girl 10:6 22:3, 23 29:9  
31:21 33:16  
girls 13:21 20:18 22:17  
29:19 32:7, 8, 21 36:7, 7  
give 10:9 16:19 26:13  
29:7 37:6  
gives 9:20  
giving 7:11  
go 14:24 15:6 16:20  
17:3 22:22, 25 26:4  
33:5, 13, 18  
goes 4:14  
going 5:8, 17, 21 6:11,  
19 7:9 8:5 9:10 22:17  
35:19

Good 4:7 10:7 25:12,  
16 32:4, 7 33:6  
gotten 6:5  
guess 10:6  
guessing 21:7  
guy 16:14, 17 17:4, 6  
18:15 19:12, 15 22:23  
23:4 26:8 33:4 35:8  
guys 14:25 36:14

<H>  
half 18:17 21:14, 15, 15  
24:21 36:6  
hand 38:19  
handle 33:7  
happen 10:20, 22 20:23  
21:25 22:3 27:13  
happened 20:17  
happening 30:4  
held 15:8  
hereunto 38:18  
Hey 22:23  
hide 23:7  
hired 12:24, 25  
HOLDINGS 1:2  
home 11:20 13:19 14:7  
35:8  
honest 31:20  
hoping 37:4  
hour 18:17 21:14, 15  
24:21  
hours 14:17 21:15  
house 12:18 16:22  
21:10 28:14 29:7 33:15  
husband 11:19 33:6  
35:2  
hustle 13:22

<I>  
identify 5:21  
inappropriate 31:20  
inclined 22:19  
indicated 23:8 31:5  
indirectly 38:17  
information 5:24 6:2, 5,  
14 34:5, 12  
inside 16:7 23:18  
instance 2:2  
Insults 32:13, 14  
interacted 14:9 27:17  
interested 38:16  
interpersonal 32:3  
intimate 26:13, 14, 16  
intoxicated 27:12, 21  
issue 6:18  
issues 19:2

<J>  
JEFF 2:12, 14 34:14  
job 10:8 12:16, 22  
25:23 33:17, 19  
jobs 36:13  
Joe 12:17 33:13, 15, 24

Jon 20:20, 20, 22, 24  
33:23  
jump 28:5  
Juneau 8:2

## &lt;K&gt;

keep 21:9 25:2  
keeping 21:16 25:12  
keeps 17:5 21:9, 10  
kids 9:6 33:5, 18  
kind 12:19 25:21 29:8  
32:1  
kitchen 17:14, 15, 18  
knew 22:17  
know 4:11, 21 10:9  
16:23 18:19 19:1, 1, 14,  
14 20:16, 21 21:5 24:3  
26:7, 10, 12, 12, 13 28:6  
31:16 32:16, 17 34:12,  
16 36:11, 14

## &lt;L&gt;

labeled 15:24  
lap 16:15, 20 17:21  
18:6, 17 23:12 26:17  
29:20, 22 37:5  
LAW 2:12 34:14  
lawsuit 4:24  
lawyers 5:2, 15 6:4  
Lax 20:7, 8  
leave 33:7, 9, 10  
left 15:23  
left-hand 15:17  
likes 18:16  
line 27:24 32:1  
literally 35:11  
little 14:9 17:14, 17, 18  
19:6, 6, 22  
LLC 1:2, 4  
Lobby 15:20  
location 5:11 7:16 8:2,  
6 15:15  
locations 7:23 8:1  
long 7:14 13:10 31:12  
longer 9:6 31:5  
look 15:15 19:14 22:7  
29:8  
looked 19:15  
lot 13:21 20:16, 17  
21:2 32:7, 8 36:6

## &lt;M&gt;

Madison 2:15  
main 15:18, 22, 22  
making 22:11 30:4  
management 24:12  
26:7 28:12 31:1, 4  
manager 31:9, 14 33:4,  
5  
Mark 33:4  
marked 3:2 9:13 15:11,  
20 37:16

Matt 33:4, 5, 8  
matter 5:20  
mean 13:4 17:22 19:4,  
11 26:10 28:2 30:3, 22  
31:19, 25 36:13  
meaning 5:14 20:2, 8  
25:15 29:22 36:22  
mentioned 34:4  
Merit 2:6  
MICHELLE 1:12 2:1  
4:2, 7 38:6  
midnight 10:14, 21 29:1  
MILWAUKEE 1:7, 17  
2:9, 19 4:9, 24 5:6, 12  
34:4 38:2, 11  
minimum 28:22  
minutes 7:5 28:6  
modeling 12:10  
mom 12:18 29:7 33:12,  
15  
Monday 8:24 9:1 13:17  
Mondays 11:13, 17  
money 11:7 13:18 14:3,  
6, 10, 15, 16 15:4, 5  
16:22 17:2 19:17 20:2,  
4 21:16, 20, 21 22:11,  
20 25:24 28:12 29:11,  
14 30:10, 19, 20 36:13  
month 23:22 24:9  
months 8:19 23:17  
mood 32:23  
mouth 27:16  
move 34:11  
multiple 21:11, 15  
Municipal 1:13 2:8  
4:10 38:10

## &lt;N&gt;

name 4:7 5:17, 18, 22  
6:10 32:11, 12 34:5  
named 33:4  
nature 6:22  
necessarily 8:5  
necessary 14:4  
need 5:20 29:9  
needed 27:25 28:4  
29:2, 9 34:8  
negative 32:18, 24  
never 12:4 18:24 25:25,  
25 29:18, 18  
nice 29:14 31:18 32:17  
33:23, 24  
Night 9:2 10:14 13:16,  
19 23:11, 14 28:7 29:1,  
4 30:20  
nights 12:3 13:16  
23:14, 15 28:7  
nine 7:18  
Nope 35:16  
normal 36:22  
North 1:17 2:8, 18  
38:10

Notary 2:7 38:5, 23  
notice 27:3, 5, 7  
number 34:13

## &lt;O&gt;

oath 4:3 6:15  
obligated 28:18, 19, 21,  
23  
obligation 19:9, 11  
occasion 16:6 17:24  
21:23  
occurs 17:3  
October 1:13 2:9  
34:21 38:12, 20  
offered 5:5  
OFFICE 2:16 38:19  
Oh 33:3 34:21  
Okay 4:7, 13, 17, 20 5:1,  
6, 14, 19, 23, 25 6:3, 12,  
16, 17, 18, 21, 24 7:2, 3, 7,  
8, 12, 14 8:3, 7, 12 9:8,  
13, 17, 24 10:2, 11, 16, 20  
11:6, 11 12:19 13:1, 9  
14:10, 11, 21 15:2, 6, 12,  
17 16:9 17:2, 20 18:11  
19:20 20:15, 22 21:6,  
23 23:1, 6, 16, 18, 24  
24:1, 10 26:6 27:11, 15,  
23 28:16 29:1, 12 30:2,  
7, 8, 22 31:3, 12, 17  
32:24 33:2, 20 34:2, 3,  
7, 8, 10, 15, 17, 19, 23  
35:3, 13, 17, 22 36:5  
37:9, 11  
OLSON 2:12, 14 34:14  
37:12, 14  
once 12:24 23:22 24:9  
open 5:4  
opened 7:17  
order 9:21  
outfit 23:23, 24  
outfits 24:6  
outside 24:11 27:24  
owner 33:24  
owners 34:1

## &lt;P&gt;

p.m. 1:13 2:10, 11 9:4  
37:15 38:12  
p.m. 9:3  
PAGE 3:7  
paid 14:3 18:1 23:12  
27:5 33:9  
Part 6:18 36:18  
particularly 27:3  
parties 5:14, 15 38:15  
pay 9:20 10:14, 16, 23,  
25 11:4 13:6 14:17  
17:6 18:22, 23 28:2, 16  
29:2, 4  
paying 10:20 22:20  
28:14

people 27:11, 17 29:16  
percent 27:2, 17 36:8  
percentage 35:25 36:5  
perform 9:21  
performed 7:21  
performing 22:13  
permitted 20:5  
Perry 31:11, 12, 12, 22  
32:24 33:3  
person 12:17 17:10  
28:19 37:3  
personal 34:5 38:8  
personally 31:24  
phone 31:22 34:13  
places 15:23  
Plaintiff 2:16  
Plaintiffs 1:5 5:3 6:4  
plan 3:9 15:14  
please 7:6  
pocket 29:11, 14  
point 5:10, 20 28:12  
32:19  
pointing 17:13  
portion 24:23  
position 12:11 24:11  
power 31:16  
preferred 19:12  
premises 27:12, 20  
pre-paid 30:10, 14  
presumably 21:19 22:10  
pretty 13:7 23:22  
price 18:3  
primary 14:13  
private 26:14  
probably 20:1 21:7  
27:2 36:8  
problem 33:16  
problems 33:17  
Procedure 2:4  
PROCEEDINGS 4:1  
proceeds 36:25  
process 16:4 35:10  
Professional 2:5  
provide 13:3  
Public 2:7 38:5, 23  
purchases 23:18  
pursuant 2:3, 4  
put 27:16

## &lt;Q&gt;

question 5:19 7:4, 9, 10,  
11  
questions 4:18 6:20  
8:3 37:10, 13  
quit 35:11

## &lt;R&gt;

rarely 27:13  
rates 9:20  
read 13:4  
really 10:7 13:10 26:16  
27:5 31:25 32:8 33:23

<p> Realtime 2:6  reason 12:5 19:23  recall 13:3 34:19  receive 15:3 22:8 25:21  received 15:5  record 15:6, 8  recorded 38:7  records 25:15, 16  reduced 38:7  REFERENCED 3:7  referencing 8:17  register 16:17 17:19  25:16  Registered 2:5, 5  regular 13:18 14:16  20:13  regularly 11:12  regulars 13:22  relationship 24:10  relative 38:14, 15  remain 18:3  remember 5:7 13:10  remind 6:13  renew 13:11  renewed 13:14  rentals 14:4 25:12  rentals, 21:11  rented 25:2  renting 13:7  rephrase 7:6  Reported 1:25  Reporter 2:5, 6, 6 4:17  6:19  represent 4:24 5:2  15:13  representing 6:4  re-read 13:12  response 26:11, 15  rest 17:6  rhyme 19:23  ride 27:25  right 5:8 6:8, 17 7:13  8:6, 10, 11 11:5 14:2  17:9, 15, 17, 17 19:16,  20 20:10, 12 21:13, 17  22:5, 9 23:8, 9 25:5, 8  28:7, 9, 24, 24 29:2, 23  30:5, 13, 15 31:6, 7  34:22 35:21 36:16, 21  37:8  RMR 1:25 38:4, 23  room 5:2 18:12, 21  21:8 22:23 23:9 24:19,  20 25:9, 13 26:8 30:12,  14 31:23 32:22  rooms 16:2, 7 19:3  20:1, 5, 16 23:16  routine 36:18  Rowdier 12:8  RPR 1:25 38:4, 23  rub 26:14  rude 32:8  rule 20:8 </p>	<p> Rules 2:3 19:3, 7 20:7,  8  run 29:10    &lt; S &gt;  S.C 2:12  sales 37:1  Sarah 1:25 2:4, 14  38:4, 22  Saturday 12:3  Saturdays 12:4  saved 33:18  says 18:18  schedule 3:7 9:17  school 9:6 10:8  SCOTT 2:12, 14 33:15  34:14  screens 16:18 17:19  30:3  seal 38:19  Seating 15:24 17:16  second 15:7  see 15:20, 24 17:23  22:19  seek 15:2  seen 25:25 27:13  sell 24:2 26:9  sense 7:6  served 34:19  server 35:10  set 8:20 14:24 17:18  22:16 38:19  share 21:8, 21 24:20  30:7, 23  shift 9:2, 7 10:18  shifts 35:20  shoes 24:2, 4, 7  short-changed 25:18  show 15:10  showing 9:13  sick 33:18  signed 6:6  Silk 5:11 6:5 7:15, 21,  23 8:4 9:10, 21 10:2  11:6 12:12, 14 14:4, 10,  14 15:14 18:1 19:2  23:19 24:12 25:11  28:1, 2, 11 30:10, 23  32:25 35:13  Silver 5:11 7:15 8:5  15:14  sit 14:18 36:23  sitting 16:14 18:15  36:20  SIX 1:2 8:18  skills 32:3  snacks 29:13  snotty 33:21  socialize 24:14, 15  soda 27:8  somebody 26:2 28:3  36:20 </p>	<p> Sondag 1:25 2:5 38:4,  22  song 17:5  sorry 9:1 14:8 33:11  35:25  Sort 4:12  speak 7:1  speaking 32:20  specific 18:20  spectrum 13:25  spend 18:16 24:5  spending 21:19  split 16:23  spoken 34:23 35:13  spot 13:7  Spring 5:11 7:15 8:5  15:14  SS 38:1  staffing 17:10  stage 5:17, 18 15:23  25:5 29:2  standing 16:17  STAR 1:2  Start 16:13 26:2  started 6:6 7:17 10:1  12:14 25:22  State 2:7 7:24 38:1, 5  stated 13:5  STATES 1:1  stay 8:18  Stephens 2:18 3:2 4:6,  8 15:9 37:9  stick 10:2  stolen 31:22  stop 17:7 22:4  store 23:19 29:10  Street 2:15  strict 11:6  Strike 9:18 16:5  stripper 33:12  structure 10:3  stupid 32:16  subcontractor 13:6  subpoena 2:4 34:20, 24  35:15  subpoenaed 35:6  subsequent 18:4  Suite 2:15  Sunday 8:24 9:1 13:16  Sundays 11:13, 17  super 33:24  supposed 10:14  sure 18:24 20:14 30:4  suspect 22:7  sworn 4:3, 21 6:15    &lt; T &gt;  tab 11:2  tack 18:23  take 6:25 13:19 14:7  19:13  taken 2:2 38:10  talent 12:9 </p>	<p> talk 12:15 14:18 22:25  26:8 35:18  talked 12:17 33:23  talking 14:17 36:20  tampon 29:9  taverns 5:4  tell 4:21 6:15 14:12  19:12 22:23 26:12 31:8  term 21:13, 13  terms 12:15 14:10  testified 4:4  Thank 37:10  Thanks 37:12  theirs 16:22  thief 31:25  thieves, 31:24  thing 18:25  things 6:9, 11 20:1  32:10 36:15  think 20:17, 18, 25 22:1,  3 26:9 27:5 32:16 34:2  thoroughly 13:5  thought 29:18 30:19  three 7:22 9:5 16:24,  25  Throw 26:5  Thursday 8:25 13:17  Thursdays 9:2 11:13, 18  time 5:10 7:1, 21 8:2,  13, 18, 19 9:4, 21, 25  10:8, 12, 22 11:4, 14, 16,  19 14:18 17:8 24:15  27:15 28:13 34:8 35:8  37:7  timeframe 8:12  times 7:19 11:12, 21  23:11 25:2  tip 14:22, 23, 25 21:1, 2  22:17 28:16, 19, 21, 22  29:5, 7, 19, 20, 23 37:6  tip, 28:25  tipped 29:16, 18  tipping 28:14  tips 19:18 22:8, 10  25:4 30:23  today 4:9 34:20  told 33:8, 11, 16 35:5, 7  tone 32:9, 10  total 7:19, 20 8:16  touch 19:5, 21 20:9  26:19, 21  touching 16:21 18:25  19:8 20:25 21:24  track 17:5 25:2, 12  train 25:25  trained 25:25  training 25:21  TRANSCRIPT 4:1  tried 23:7  trip 31:16  trust 24:25  truth 4:22 6:16 </p>
---	---	--	--

try 36:14  
twice 23:22 24:9  
two 15:23  
two-thirds 21:16  
typical 13:16  
typically 6:9 10:13 23:9

## &lt;U&gt;

um-hum 6:23 13:2  
14:8 23:25 37:8  
understand 7:10  
understanding 5:9 6:1  
14:12 16:1 19:7 24:19  
understood 18:24  
UNITED 1:1  
un-un 6:23  
unusual 27:9  
use 5:17  
usually 28:8

## &lt;V&gt;

vein 11:9  
verbal 6:22  
VIP 17:22 18:19  
voice 32:9, 10  
vs 1:6

## &lt;W&gt;

wad 23:4  
wait 24:22 28:6 33:3  
34:21  
waiting 27:24 28:3  
walk 15:22 16:16 18:18  
walked 22:24  
walking 25:7  
walks 14:22, 23  
wallet 22:24  
want 6:13 14:9 21:24  
22:3 27:16  
wanted 18:8  
watching 30:3  
water 27:8  
way 4:17 14:13 19:13  
22:8 30:24 31:19  
Wednesday 1:13 8:24  
9:2 13:17  
Wednesdays 11:13, 18  
week 8:21  
weekends 12:6  
weeks 7:22 34:22  
Well 5:19 6:6 11:25  
14:12 16:4, 11, 12  
26:12 31:5 32:21 35:2,  
7  
went 14:14  
we're 5:16, 20 34:2, 2  
West 2:15  
whereof 38:18  
wide 13:24  
Wilson 2:15  
WISCONSIN 1:2, 17  
2:7, 9, 15, 19 38:1, 5, 11

witness 2:1 4:2 37:11,  
13 38:18  
word 23:1  
words 27:16  
work 6:10 8:2, 20, 23  
9:5, 6, 8; 11 10:17  
11:20, 21 12:3 13:6, 20  
14:14 16:6, 10, 24, 25  
28:8 31:5  
worked 7:15 8:1, 12, 13,  
24 9:4 11:25 12:4  
23:10 25:22  
working 6:7 10:15  
11:12 12:14 13:17  
25:22 36:3, 9  
works 16:9 18:14 24:19  
worth 26:9  
writing 38:7  
written 34:21

## &lt;Y&gt;

yeah 6:6 12:2, 4, 8  
13:15 15:19 17:17  
22:6 23:5, 5 26:3, 16  
28:2, 17 29:16 33:11  
35:7 36:17, 19  
year 7:17 8:19 13:11,  
14, 15  
years 7:18, 20 9:5  
23:10 31:13, 14, 15 33:3

## &lt;Z&gt;

Zeidler 1:13 2:7 4:10  
38:10