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PETRIE & STOCKING

ATTORNEYS AT LAW

April 26, 2005

City of Milwaukee
Zoning, Neighborhoods, and
Development Committee of the Common Council
841 North Broadway Street
Milwaukee, WI 53202

To the Honorable Members of the Common Council:

**Re: #04-0644 / Ordinance relating to Zoning Regulations
 for Parking Lots in C9D Civic Activity, Downtown Zoning District**

The wording of this proposed ordinance change clearly states that it will only apply to the Wisconsin Center District (WCD) property. The ordinance changes parking from a special use, where the Board of Zoning Appeals approval must be obtained, to a limited use, which makes parking on the WCD property a basically unregulated activity while other property owners in the zoning district must obtain a special use permit.

Isaacs Family Limited Partnership, which owns a 750 auto parking structure on the corner of North 3rd Street between Wells Street and Kilbourn Avenue, hereby objects to this ordinance change, which effectively grants to WCD special privileges not granted to other property owners in the C9D Civic Activity, Downtown Zoning District. Further, WCD's current operation of its lot is in violation of the current Special Use Permit, which has adversely affected Isaacs Family Limited Partnership's parking facility.

OVER
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YEARS

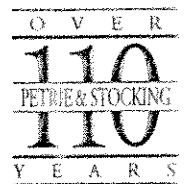
History

When the original building permit for the Midwest Airline Center was granted, a parking lot was requested as a special use for the use of patrons of Midwest Airline Center events. The Board of Zoning Appeals (BOZA) approved that parking use. Subsequently on September 27, 2000, BOZA granted permission for WCD to open a second driveway on Kilbourn Avenue. At that hearing an oral request was made to expand the usage of the parking lot so that it was a parking lot for the general public and not specifically for persons attending events at the Midwest Airline Center. The then Chairman of BOZA told the WCD representative that the change could not be made unless a proper application to BOZA was made with notice to all of the neighboring property owners. The City staff pointed out that the original application as well as the current application refers only to patrons while they are attending Midwest Airline Center events. The expansion was approved with the request that if WCD wanted to utilize the lot as a general parking lot that a new application should be filed. No such application was ever filed with BOZA until March 3, 2005.

On September 17, 2003, WCD filed an application requesting additional parking at the Midwest Airline Center parking lot for patrons of Midwest Airline Center. At that time the additional 86 spaces in addition to the 240 existing spaces would effectively eliminate all of the greenspace at Midwest Airline Center of the WCD parking parcel. Isaacs Family Limited Partnership filed an objection to the request for expansion of the WCD Special Use Permit.

In researching the record, it was discovered that WCD had allowed its Special Use Permit to expire. Further, at some point in time WCD had begun to violate the Special Use Permit by allowing the parking lot to be open for any and all events. Eventually, this came before a hearing on March 3, 2004. At that hearing BOZA treated the application as both a renewal of the September 2000 Special Use Permit as well as the expansion request. BOZA pointed out that WCD could only operate the parking lot for patrons of Midwest Airline Center events. The representative of WCD agreed that is what they would be doing in the future. Isaacs Family Limited Partnership at that time objected to the expansion of the special use on the grounds that:

- A) Traffic entering WCD parking lot from the Kilbourn entrance created a dangerous situation for autos because of the lineup and WCD never had adequate staff to get the autos in quickly, minimizing the lineup of waiting vehicles. Autos desiring to park elsewhere had to pull out into traffic from the long lineup endangering themselves to being struck by autos travelling along Kilbourn Avenue
- B) The Special Use Permit was damaging the value of the other parking lots in the area who pay City property taxes.
- C) The additional parking was not necessary.



BOZA then granted a one-year extension without the additional 86 spaces requested, keeping intact the restriction that WCD's parking lot could only be used for Midwest Airline Center events. The decision was dated March 3, 2004.

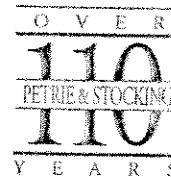
WCD immediately started to violate the restriction, having its parking lot open for area events other than those held at Midwest Airline Center. The Department of Neighborhood Services issued an order against WCD on March 9, 2004 that it was in violation of the Special Use Permit.

A week later WCD filed an appeal of the order and a request for a rehearing on the March 3, 2004 Special Use Permit. The effect of filing the appeal means that enforcement would not occur. This appeal was pending when it was finally set for a hearing a year later on March 3, 2005. When Isaacs Family Limited Partnership's attorney appeared for the hearing it was discovered that the day before WCD had dismissed its appeal.

It was also discovered that on March 5, 2005 WCD had for the first time requested a Special Use Permit to allow it to operate a general public parking lot in competition with the private parking lots in the area. This was the same petition that BOZA had suggested in September 2000. In the meantime, WCD has continuously violated the current Special Use Permit. Isaacs Family Limited Partnership made complaints to the Department of Neighborhood Services, which informed them that the Commissioner decided not to enforce the restriction, allowing the parking lot to be operated in violation of the special use permit.

It was also discovered that an ordinance had been introduced to do *spot zoning* for the WCD property so that it would not have to comply with BOZA's restrictions. WCD, since September 2003, has violated the existing Special Use Permit and has had the parking lot open whenever there are any events Downtown, not just while Midwest Airlines Center had events occurring.

In a letters to various persons, WCD claims the operation of the parking lot is crucial to the operation of the Midwest Airlines Center. Yet, the restriction BOZA has imposed and that the Isaacs Family Limited Partnership has requested the Department Neighborhood Services to enforce only forbids the usage of the parking lot when the Midwest Airlines Center is not holding an event. There are over 1,500 parking spaces connected to the Midwest Airline Center via skywalks plus another 4,000 spaces within two blocks walking distance of the Midwest Airline Center. An additional 250 spaces are not crucial to the operation of the Midwest Airlines Center or any other facility nearby. (See chart of available parking, Exhibit B.)



Reason for the Zoning, Neighborhood and Development Committee and the Common Council to Reject the Ordinance Change

1. WCD does not pay property taxes! However, WCD is in direct competition with parking structures and lots nearby, most of which all pay property taxes. As you will see from attached Ex. A, a detailed log of parking

since December 2004, WCD regularly fills up before Isaacs Family Limited Family Partnership's parking structure. *Note:* most of the times listed are when WCD is operating its parking lot in violation of its current Special Use Permit. Dates when WCD is legally operating its parking lot are not listed.

2. Only on very rare occasions do both entities (WCD and Isaacs Family Limited Partnership) fill up.

3. WCD's parking lot creates a dangerous traffic situation on Kilbourn Avenue. Vehicles line up and cannot get around because of the continuous flow of traffic.

4. People do not have an opportunity to reach the Isaacs Family Limited Partnership lot because of the steady lineup to the WCD parking lot.

The only time that both lots seem to fill is when there is an event at Midwest Airline Center, Milwaukee Theater and at US Cellular Arena. Therefore, there is no need for the general parking status at WCD. There is a procedure in effect for WCD to expand its parking facility. This procedure is to apply for a Special Use Permit at the BOZA level. Even though WCD was told in September 2000 the procedure to be followed to make its parking lot into a general parking lot it was never done until March 2005. This petition is still pending before BOZA.

There should be some question by the Common Council as to:

- a. Whether or not proper notice of the hearing has been given to the neighboring property owners.
- b. Public notice published in the newspaper does not really reflect that the proposed ordinance applies only to WCD property, although a letter from the City Plan Commission does point this out. **However, neither Isaacs Family Limited Partnership or the other neighboring property owners have received notice of the City Plan Commission's consideration of this new ordinance.** Therefore, even though the City Plan Commission recommended the ordinance change, the recommendation is subject to question because neighboring property owners did not get notice of the proposed change.
- c. What effect will the proposed amendment to the zoning code have on all parking establishments.

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- d. Should special privileges be applied to one parcel of real estate when there are similarly used parcels in the area?

“Spot Zoning” defined under Wisconsin case law is zoning that gives special privileges that apply only to one parcel of real estate. While such spot zoning may be justified under certain circumstances, those circumstances are not present here. *See, Step Now Citizens Group v. Town of Utica Planning & Zoning Committee*, 663 N.W.2d 833; *Bubolz v. Dane County*, 464 N.W.2d 67; *Ballenger v. Door County*, 388 N.W.2d 624

The City Plan Commission says that the proposed text change will affect only one property which would not be required to obtain a special use permit which would fit the definition of spot zoning in Wisconsin.

WCD has not followed BOZA procedures in order to get a Special Use Permit. It has unilaterally violated the Special Use Permit. The City of Milwaukee Department of Neighborhood Services has failed to enforce the code violations of the special use permit.

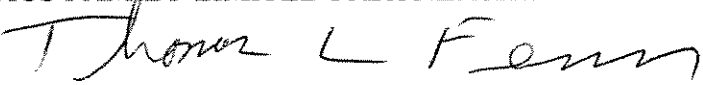
Isaacs Family Limited Partnership, owned by Willard Isaacs' family, has done business in Downtown Milwaukee for many years. Parts of the Midwest Center District are located on land that was owned by Will Isaacs and taken from him through the power of condemnation.

In summary, Isaacs Family Limited Partnership urges the Common Council and Zoning, Development and Planning Committee to reject the amendment to the zoning ordinance to give special privileges to the Wisconsin Center District.

Very truly yours,

ISAACS FAMILY LIMITED PARTNERSHIP

by:


THOMAS L. FRENN,
Petrie & Stocking S.C., Attorneys
and Authorized Agent

Nancy Kaliebe
Isaacs Family Limited Partnership
330 West Wells Street
Milwaukee, WI 53203



Enc.

INSPECTION REPORT AND ORDER TO CORRECT CONDITION

CITY OF MILWAUKEE
DEPARTMENT OF NEIGHBORHOOD SERVICES
Zoning Inspection Section
841 N. Broadway
Milwaukee, WI 53202

RICHARD GEYER REG AGNT
400 W WISCONSIN AV
MIL WI 53203

Serial #: 004416871
Inspection Date: March 09, 2004
District #: 373
CT: 152

asse-com

Recipients:
RICHARD GEYER REG AGNT, 400 W WISCONSIN AV, MIL WI 53203
ROBERT SEEFELD BLDG SUPT., 400 W WISCONSIN AV, MIL WI 53203

Re: 400 W WISCONSIN AV

Taxkey #: 392-2451-000

A recent inspection of the premises at the above address revealed conditions that violate the Milwaukee Code of Ordinances. You are hereby ordered to correct each violation listed below within 1 days of service of this order.

Be advised that in accordance with Sec. 200-11-4, should you fail to correct this violation you will be required to discontinue the use and vacate the premises.

1. 295-311-4-a
A special use shall operate in conformance with its approved plan of operation, site plans and conditions of approval. Such special use shall not be enlarged or intensified without the approval of the Board of Zoning Appeals.

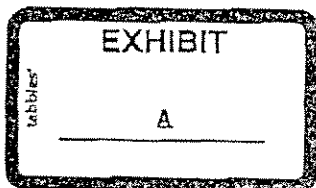
-YOU MUST OPERATE YOUR FACILITY IN ACCORDANCE WITH THE PLAN OF OPERATION APPROVED BY THE BOARD OF ZONING APPEALS MARCH 3, 2004 AND SPECIFICALLY ITEM #6. THAT THIS PARKING LOT ONLY BE UTILIZED TO ACCOMMODATE EVENTS HELD AT THE MIDWEST AIRLINE CENTER.

YOU ARE TO IMMEDIATELY DISCONTINUE THE ILLEGAL USE OF THIS LOT FOR ANY OTHER EVENT OR PURPOSE.

For any additional information, please phone Inspector Edward Hofman at [414]-286-8815 between the hours of 7:00am-9:00am or 3:00pm-3:45pm Monday through Friday.

Per Commissioner of Neighborhood Services By-

Edward Hofman
Edward Hofman
Inspector



OFFICIAL NOTICE OF VIOLATION

The City of Milwaukee - Department of Neighborhood Services

Some Parking Lots Near Midwest Airline Ctr.

No. of Spaces

105 West Michigan Street	659
2 nd Street Garage/724 North 2 nd Street	501
3 rd & Wells	810
Isaacs Family Ltd. Partnership 330 West Wells Street, connected by Skywalk	725
McArthur Square	1,500
Boston Store Parking	700
Hilton Center, connected by Skywalk	850
Time Garage 601 West Wells Street	501

(A complete list can be viewed at the City website)

**VIOLATIONS of the March 3, 2004 Special Use Permit
by the Wisconsin Center District
(December 2004 to February 2005)**

Bradley Center
Hyatt
Isaacs Family Ltd. Parking (810 parking stalls total)
Midwest Airline Ctr. & Parking (MWC) (242 parking stalls total)
US Cellular Arena

DNF = Isaacs structure did not fill
FLD = Isaacs structure filled for listed event
PC = Number of cars collected for listed event

<u>Date:</u>	<u>Event:</u>
12/1/2004	Marquette v. Delaware, Bradley Center UWM v. So. Dakota, US Cellular Arenan MWC lot filled with cars for non-Midwest function (UWM game) Isaacs structure DNF with cars for Marquette or UWM games (171 PCs) Violation of City Ordinance
12/02/04	Transiberian Orchestra, Milwaukee Theater Johnson Sausage, Midwest Center MWC lot filled with cars for a non--Midwest function (Transiberian Orchestra) Isaacs DNF with cars for Transiberian Orchestra (138 PCs) Events with lower pricing, cars go across the street first. Violation of City Ordinance
12/17/04	Miracle Homes Party, Hyatt Wave v. Baltimore, US Cellular Arena Admirals v. Chicago, Bradley Center MWC lot filled with cars for a non-Midwest function (Wave) Isaacs DNF with cars (Wave) (177 PCs) Violation of City Ordinance
12/18/04	Marquette v. Arizona, Bradley Center Bucks v. Philadelphia, Bradley Center Cardinal Stritch Graduation, Cellular Arena MWC lot filled with cars for non-Midwest function (Cardinal Stritch Graduation) Isaacs FLD with cars for Bucks, Marquette & Cardinal Stritch) (798 PCs total, all 3 events throughout the day)

- 12/19/04 UWM Graduation, Cellular Arena
Marquette Graduation, Cellular Arena
MSO Pops & Leann Rimes, Milwaukee Theater
- MWC lot filled with cars for a non-Midwest function (UWM Graduation, Leann Rimes & Marquette Graduation)
Isaacs DNF with cars for Marquette Graduation (171 PCs)
Isaacs FLD with cars for UWM Graduation 467 PCs
Isaacs DNF with cars for Leann Rimes (81 PCs)
- 12/21/04 Marquette v. Nebraska, Bradley Center
Worlds Largest Office Party, Hyatt
MATC Graduation, US Cellular Arena
- MWC lot filled with cars for non-Midwest function (MATC Graduation)
Isaacs DNF with cars for MATC Graduation (291 PCs)
Violation of City Ordinance
- 12/31/04 Globetrotters, Bradley Center
New Years Eve Party, Hyatt
Wave v. Chicago, US Cellular Arena
- MWC lot filled with cars for non-Midwest function (Wave v. Chicago)
Isaacs DNF with cars for Wave game (200 PCs)
Isaacs DNF with cars for Globetrotters game (300 PCs)
Violation of City Ordinance
- 01/03/05 UWM v. Detroit, US Cellular Arena
- MWC filled halfway with cars for non-Midwest event (UWM game)
Isaacs DNF with cars for UWM game (42 PCs)
Violation of City Ordinance
- 01/07/05 Home Builders Show, Midwest Center
Admirals v. Chicago, Bradley Center
Wave v. St. Louis, US Cellular Arena
- MWC filled with cars for Midwest event (Home Show) during latter part of the day
MWC filled with cars for non-Midwest event (Wave Game)) during the evening
Isaacs DNF with cars (246 PCs)
Violation of City Ordinance
- 01/08/05 Bucks v. Utah, Bradley Center
Admirals v. Houston, Bradley Center
Home Builders Show, Midwest Center
UWM v. Loyola, US Cellular Arena
- MWC filled with cars for non-Midwest event (UWM game) during the evening
MWC filled with cars for Midwest event (Home Show) during the day
Isaacs DNF with cars for Bucks game (320 PCs)
Violation of City Ordinance

- 01/09/05 Home Builders Show, Midwest Center
Marquette Mother/Son Dinner, Midwest Center
- MWC filled with cars for Midwest event (Home Show & Marquette during the day)
Home Show this year is ending quietly.
Isaacs DNF is half full at this point with a lot of turnover.
- 01/14/05 Bucks v. Washington, Bradley Center
Singh Party, Hyatt
Wave v. Philadelphia, US Cellular Arena
- MWC filled with cars for non-Midwest event (Wave Game) during the evening
Isaacs DNF with cars for Bucks & Wave games) (399 PCs)
Violation of City Ordinance
- 01/15/05 Marquette v. So. Florida, Bradley Center
St. Luke's, Hyatt
UWM v. UWGB, US Cellular Arena
- MWC filled with cars for non-Midwest event (Wave Game) during the evening
Isaacs DNF with cars for UWM & Marquette games (298 PCs)
Violation of City Ordinance
- 01/17/05 UWM v. Wright State, US Cellular Arena
- MWC did not fill for a non-Midwest event (UWM Game) during the evening. MWC lot was almost empty.
Isaacs DNF for UWM (42 PCs) (Bad crowd)
- 01/20/05 Admirals v. San Antonio, Bradley Center
WSB, Hyatt
UWM v. Cleveland St., US Cellular Arena
- MWC filled for a non-Midwest event (UWM game) during the evening
Isaacs DNF with cars for UWM game (123 PCs)
Violation of City Ordinance
- 01/22/05 Admirals v. San Antonio, Bradley Center
Marquette v. Charlotte, Bradley Center
Party, Hyatt
Dog Show, Midwest Center
Wave v. Cleveland St., US Cellular Arena
- Busy day with the dog show in the Isaacs lot
MWC was busy all day with the dog show filling their lot
MWC filled with cars for a non-Midwest event (Wave game) during the evening
Isaacs DNF with cars for Wave game (56 PCs)
Violation of City Ordinance

01/26/05 Bucks v. Phoenix, Bradley Center
IACP, Hyatt
WI Emergency Conference, Midwest Center
Disney on Ice, US Cellular Arena

Busy night.
Isaacs FLD with cars for Disney, Bucks & overnight guest (420 PCs)
MWC filled with cars for non-Midwest event (Disney & Bucks)
MWC filled with cars for Midwest event during day (WI Emergency)

01/27/05 IACP Hyatt
WI Emergency Conference, Midwest Center
Disney on Ice, US Cellular Arena

Isaacs DNF with cars for (Disney & overnight guests) (331 PCs)
MWC filled with cars for non-Midwest event (Disney)
MWC filled with cars for Midwest event during day (WI Emergency)
Violation of City Ordinance

01/28/05 Bucks v. Denver, Bradley Center
WI Emergency Conference Hyatt
WI Emergency Conference, Midwest Center
Disney on Ice, US Cellular Arena

Busiest Night of the week so far.
Isaacs FLD with cars for (Disney & Bucks) (543 PCs)
MWC filled with cars for non-Midwest event (Disney & Bucks)
MWC filled with cars for Midwest event during the day (WI Emergency)
Violation of City Ordinance

01/29/05 Rodeo, Bradley Center
IACP, Hyatt
WI Emergency Conference, Midwest Center
Disney on Ice, US Cellular Arena

Isaacs DNF for Disney & Rodeo in any of the three shows (323, 320 & 403 PCs respectively)

01/30/05 Disney on Ice, US Cellular Arena
Rodeo

Isaacs DNF for Disney & Rodeo, either of two shows (301, 166 PCs respectively)
MWC filled with cars for 2 shows of a non-Midwest event (Disney)
Violation of City Ordinance

02/04/05 Bucks v. Clippers, Bradley Center
Whitney Education, Hyatt
Mifflin-Houghton, Hyatt
WI Reading Association, Hyatt
WI Reading Association Midwest Center
Dora the Explorer, Milwaukee Theater
Wave v. St. Louis, US Cellular Arena

MWC filled with cars for Midwest function (WI Reading (during the day)
MWC filled with cars for non-Midwest event (Dora the Explorer & Wave game
during the evening)
Isaacs FLD with cars for (Dora the Explorer, Wave & Bucks) during the evening
(456 PCs)

02/05/05 Marquette v. Mississippi, Bradley Center
Whitney Education, Hyatt
Mifflin-Houghton, Hyatt
WI Reading Association, Hyatt
WI Reading Association, Midwest Center
Dora the Explorer, Milwaukee Theater
UWM v. UIC, US Cellular Arena

MWC lot filled with cars for Midwest event (WI Reading during the day)
MWC lot filled with cars for non-Midwest event (Dora the Explorer & UWM game)
during the day and evening)
Isaacs FLD for Dora the Explorer & UWM during the day (634 PCs)
Isaacs DNF with cars for Dora the Explorer & Marquette during the evening
(166 PCs)
Violation of City Ordinance

02/06/05 Dora the Explorer, Milwaukee Theater

MWC lot filled with cars for non-Midwest event (Dora the Explorer during the 2
event times of the day)
Isaacs DNF for Dora the Explorer during the 2 event times during the day with
380 and 480 stalls open (124 & 145 PCs)
Violation of City Ordinance

02/08/05 Bucks v. Boston, Bradley Center
Nalco, Hyatt
GE Health, Hyatt
Diversity Job Show, Midwest Center
Culver Expo, Midwest Center

MWC filled with cars for Midwest event (Diversity Job Show & Culver Expo) during the day
MWC took in 13 cars for the Bucks game, a non-Midwest function
Isaacs DNF with cars for Bucks v. Boston during the evening (170 PCs)

02/12/05 Admirals v. Houston, Bradley Center
Bucks v. Atlanta, Bradley Center
UWM v. Youngstown, US Cellular Arena

MWC filled for UWM v. Youngstown, a non-Midwest event
Isaacs FLD for UWM & Bucks games during the evening (442 Pcs)

02/13/05 First Webber Dinner, Hyatt
Christ the King Seminar, Midwest Center
Wave v. Baltimore, US Cellular Arena

MWC filled with cars for Wave v. Baltimore, a non-Midwest event
Isaacs DNF with cars for Wave v. Baltimore during the evening (132 PCs)
Violation of City Ordinance

02/16/05 Saks Inc., Hyatt
UWM v. Butler, US Cellular Arena

MWC filled with cars for UWM v. Butler, a non-Midwest function
Isaacs DNF with cars for UWM v. Butler during the evening (153 PCs)
Violation of City Ordinance

02/19/05 Admirals v. Philadelphia, Bradley Center
ALS, Hyatt
Boat Show, Midwest Center
Josh Groban, US Cellular Arena

MWC filled for Josh Groban a non-Midwest event
Isaacs FLD for Josh Groban and ALS during the evening (379 PCs)

02/20/05

Marquette v. DePaul, Bradley Center
Boat Show, Midwest Center
Wave v. Chicago, US Cellular Arena

MWC filled for Wave v. Chicago, a non-Midwest event
Isaacs FLD for (Marquette, Wave & Boat Show during the evening
(435 PCs)

02/22/05

Admirals v. Syracuse, Bradley Center
King & I, Milwaukee Theater

MWC lot 3/4 full of cars for (King & I) a non-Midwest event
Isaacs DNF for King & I, Admirals during the evening (58 PCs)

Violation of City Ordinance

02/23/05

Bucks v. New Jersey, Bradley Center
Social Council, Hyatt
King & I, Milwaukee Theater

MWC filled with cars for King & I, a non-Midwest event
Isaacs DNF for Bucks & King & I during the evening (229 PCs)

Violation of City Ordinance

02/24/05

WTMJ Breakfast, Hyatt
King & I, Milwaukee Theater
Shrine Circus, US Cellular Arena

MWC filled for King & I & Shrine Circus, non-Midwest events
Isaacs DNF for King & I & Circus during the evening (261 PCs)

Violation of City Ordinance

02/25/05

Bucks v. Toronto, Bradley Center
Social Council, Breakfast, Hyatt
King & I, Milwaukee Theater
Shrine Circus, US Cellular Arena
Adam Valet, Midwest Center

Midwest filled with cars for King & I, Shrine Circus, non-Midwest events
Isaacs FLD with cars for Circus, K&I, Valet & Bucks during the evening (176 PCs)

02/26/05 Admirals v. St. Johns, Bradley Center
Bucks Dinner, Hyatt
Dance Competition, Hyatt
Auto Show, Midwest Center
King & I, Milwaukee Theater
Shrine Circus, US Cellular Arena

MWC filled 3x's with cars for King & I & Circus, non-Midwest events during the day
Isaacs FLD 2x's with cars for Circus & King & I during the day (458 & 579 respectively)

02/27/05 Bucks v. Seattle, Bradley Center
Auto Show, Midwest Center
King & I, Milwaukee Theater
Shrine Circus, US Cellular Arena

MWC filled 2x's for King & I and Shrine Circus, non-Midwest events
Isaacs FLD once for Circus & King and I & Bucks during the day (579 & 261 PCs respectively)
Violation of City Ordinance

02/28/05 National Grants Convention
Auto Show, Midwest Center

MWC 3/4 full for Midwest event during the latter part of the day
Isaacs DNF with cars for Auto Show at all

**VIOLATIONS of the March 3, 2004 Special Use Permit
by the Wisconsin Center District
(March 1, 2005 to March 31)**

Bradley Center
Hyatt
Isaacs Family Ltd. Parking (810 parking stalls total)
Midwest Airline Ctr. & Parking (MWC) (242 parking stalls total)
US Cellular Arena

DNF = Isaacs structure did not fill
FLD = Isaacs structure filled for listed event
PC = Number of cars collected for listed event

<u>Date:</u>	<u>Event:</u>
3/5/2005	Bucks v. Chicago, Bradley Center
	Marquette v. St. Louis, Bradley Center
	UW Dental Management, Hyatt
	Milwaukee Auto Show, Midwest Center
	Horizon Quarterfinal, US Cellular Arena

MWC lot filled for Midwest function (auto show) during the day
NMWC filled for a non-Midwest function in the evening (Horizon)
Isaacs DNF for Bucks during the day. (Isaacs sold 343 PC for the Bucks
and Horizon games.

Violation of City Code

3/6/2005 Admirals v. Grand Rapids, Bradley Center
UW Cental Management, Hyatt
Milwaukee Auto Show, Midwest Center
Wave v. Kixx, US Cellular Arena

NMWC lot filled for non-Midwest function, approx. 150 cars
MWC filled for Midwest function
Isaacs DNF for Wave v. Kixx (284 PCs for Wave game)

3/10/2005 Admirals v. Houston, Bradley Center
UPC Fundraiser, Hyatt
US Cellular Assoc. Mtg., Milwaukee Theater

NMWC filled for non-Midwest event (US Cellular). Isaacs DNF for US Cellular
even though 217 had coupons to park.

Violation of City Code

3/13/2005 Elmbrook Church, Hyatt
Elmbrook Church, Midwest Center
Wave v. Comets, US Cellular

NMWC filld with cars for Wave v. Comets a non-Midwest event
Isaacs DNF for Wave v. Comets (sold 184 PCs for Wave game)

Violation of City Code

3/16/2005 Bucks v. Cleveland, Bradley Center
Marquette Univ., Hyatt Hotel
WI Restaurant Assoc., Midwest Center
Thoroughly Modern Millie, Milwaukee Theater

MWC filled for Midwest event and again filled for non-Midwest events.
Isaacs sold 367 PC tickets for Bucks and Thoroughly Modern Millie
but DNF

Violation of City Code

3/20/2005 Thoroughly Modern Millie, Milwaukee Theater
Wave v. Philadelphia, US Cellular Arena

MWC filled for non-Midwest events. Isaacs sold 248 PC tickets and DNF

Violation of City Code

**VIOLATIONS of the March 3, 2004 Special Use Permit
by the Wisconsin Center District
(April 1, 2005 to April 20)**

Bradley Center
Hyatt
Isaacs Family Ltd. Parking (810 parking stalls total)
Midwest Airline Ctr. & Parking (MWC) (242 parking stalls total)
US Cellular Arena

DNF = Isaacs structure did not fill
FLD = Isaacs structure filled for listed event
PC = Number of cars collected for listed event

Date: **Event:**

4/1/2005 Bucks v. Memphis, Bradley Center
 ASPAC Conference Hyatt Hotel
 World Wide Dream Convention, Hyatt Hotel
 World Wide Dream Convention, US Cellular Arena

MWC lot filled with cars for non-Midwest function (World Wide Dream Builders)
Isaacs structure DNF with cars for Bucks or World Wide Dream Builders at the Arena
Arena leaving 129 stalls open
Violation of City Ordinance

4/2/2005 Admirals v. Edmonton, Bradley Center
 ASPAC Conf., Hyatt Hotel
 World Wide Dream Convention, Hyatt Hotel
 World Wide Dream Convention, US Cellular

MWC filled for non Midwest event (World Wide Dream Builders). Isaacs
DNF for either Bucks or World Wide Dream Builders leaving 300 open stalls
Violation of City Ordinance

4/3/2005 Bucks v. Nets, Bradley Center
 ASPAC Conference, Hyatt Hotel
 World Wide Dream Convention, Hyatt Hotel
 World Wide Dream Convention, US Cellular

MWC filled for a non Midwest event (World Wide Dream Builders) Isaacs DNF
leaving 285 stalls open
Violation of City Ordinance

4/8/2005 Bucks v. Charlotte, Bradley Center
 Fred Astaire Dance, Hyatt
 Wave v. Kixx, US Cellular Arena

MWC filled for non Midwest function (Wave v. Kixx) Isaacs DNF for (Bucks & Wave
games during the evening (261 PCs)
Violation of City Ordinance

4/14/2005 UWM Business School, Heat Hotel

Miller Brewing, Heat
Miller Brewing, Midwest Center

Midwest was half full with Miller cars for non-Midwest event at the Milwaukee Theater.
Isaacs DNF with cars for Miller Brewery or the UWM Business School.

Violation of City Ordinance

4/15/2005 Admirals v. Utah, Bradley Center
Engineering Exams, Milwaukee Theater

Midwest was half full for non-Midwest event at Milwaukee Theater (eng, exams)
Isaacs DNF

Violation of City Ordinance

4/16/2005 Bucks v. Orlando, Bradley Center
Engineering Exams, US Cellular Arena

Midwest was half full for engineering exams, a non-Midwest event at the US Cellular
Arena. Isaacs DNF

Violation of City Ordinance

4/19/2005 Bucks v. Toronto, Bradley Center
General Casualty, Hyatt Hotel

Isaacs only sold 131 PC tickets (Bucks last game) and did not fill the entire year for
Bucks games. MWC was open.

Violation of City Ordinance