

2020-0823
12-15-20

11-30-20
12-10-20
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NOTICE OF CLAIM
and
NOTICE OF INJURY

**TO: REBECCA GRILL, CITY CLERK OR HER DESIGNATED AGENT FOR
SERVICE OF PROCESS
CITY OF WEST ALLIS
7525 W. Greenfield Ave., Room 108 to 110
West Allis, WI 53214**

PLEASE TAKE NOTICE that this Notice of Claim and Notice of Injury against the City of West Allis is hereby presented on behalf of a minor, [REDACTED] Vang (hereinafter [REDACTED] Vang”), date of birth [REDACTED] and his parents, Jimmy Vang and Ka Vang, all of whom reside at 5816 N. 83rd Street, Milwaukee, WI 53218. This Notice of Claim and Notice of Injury arise out of the negligent actions and breaches of ministerial duties exhibited by various agents and employees of the City of West Allis Police Department that took place on August 4, 2020 and which are generally described in this document.

B. Vang and his parents allege that [REDACTED] Vang was a passenger in a vehicle that was being driven by Jimmy Vang when it was struck by a vehicle driven by Devan Santiago Vasquez (hereinafter “Vasquez”) on August 4, 2020. The Vasquez vehicle struck the vehicle that [REDACTED] Vang was riding in after one or more persons employed as police officers by the City of West Allis Police Department failed to take Vasquez into custody as required by the ministerial duties imposed upon them by the policies and procedures of the City of West Allis Police Department and/or the State of Wisconsin. After failing to take Vasquez into custody, one or more persons employed as police officers by the City of West Allis Police Department wrongly initiated and continued a pursuit of the Vasquez vehicle.

[REDACTED] Vang and his parents allege that the negligence and failure to follow the ministerial duties imposed upon the City of West Allis Police officers involved in this matter

include, but are not limited to: acting in a manner contrary to the ministerial duties imposed upon them by the policies and procedures of the West Allis Police Department and/or the State of Wisconsin; failing to conform to the policies and procedures of the West Allis Police Department relating to the arrest and detention of a suspect like Vasquez; negligently allowing Vasquez to escape from them by acting in a manner contrary to the policies and procedures of the West Allis Police Department and by negligently initiating and continuing a pursuit of the Vasquez vehicle in a manner that was contrary to the policies and procedures of the West Allis Police Department and/or the State of Wisconsin. Other aspects of the negligent conduct and the violations of the policies and procedures of the West Allis Police Department and/or the State of Wisconsin exhibited the agents and employees of the West Allis Police Department that were involved in this matter will be identified as more information regarding their conduct becomes available.

As a result of the actions, inactions, negligence and violations of the policies and procedures of the West Allis Police Department and/or the State of Wisconsin described herein, the agents and employees of the West Allis Police Department involved in this matter were negligent and breached the ministerial duties imposed by them and ■ Vang sustained injuries and experienced physical and emotional pain and suffering. His parents also sustained damages by virtue of their daughter's injuries.

Notice of Claim for said injuries is hereby presented on behalf of ■ Vang and his parents pursuant to Sec. 893.80, Wis. Stats.

NOTICE OF INJURY

PLEASE TAKE NOTICE that on August 4, 2020 and continuing thereafter, ■ Vang, date of birth: ■■■■■■■■■■, and his parents, all of whom reside 5816 N. 83rd Street,

Milwaukee, WI 53218 sustained physical and emotional injuries as well as other damages as a result of the matters described herein. Per Sec. 893.80, Wis. Stats. notice for said injuries is hereby presented on behalf of [redacted] Vang, Jimmy Vang and Ka Vang as follows:

Past Medical Expenses (Approximate)	\$3,500.00
Future Medical Expenses (Approximate)	\$3,500.00
Past and future pain, suffering and disability of [redacted] Vang.....	\$50,000.00
Loss of Society and Companionship - Jimmy Vang.....	\$25,000.00
Loss of Society and Companionship - Ka. Vang	\$25,000.00
 TOTAL	 \$107,000.00

WHEREFORE, [redacted] Vang and his parents, Jimmy Vang and Ka Vang, demand satisfaction in the amount indicated above against the City of West Allis because of the injuries sustained by [redacted] Vang on August 4, 2020.

The undersigned is the attorney for [redacted] Vang and his parents and, as such, is authorized to present and sign this Notice of Claim and Notice of Injury on their behalf.

Dated at Milwaukee, Wisconsin, this 30th day of November 2020.

McGRANAGHAN & STAWSKI LTD.

By:



Christopher J. Stawski,
Attorney for Claimants
State Bar No. 1016435

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