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SEP 22 2015

CITY OF WEST ALLIS
CITY CLERK

NOTICE OF CLAIM and NOTICE OF INJURY

TO: CITY CLERK
CITY OF WEST ALLIS
11301 West Lincoln Avenue
West Allis, WI;

CITY OF WEST ALLIS POLICE DEPARTMENT
c/o CHARLES PADGETT, CHIEF OF POLICE
11301 West Lincoln Avenue
West Allis, WI.

9/16/15
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WEST ALLIS
CITY ATTORNEY

NOTICE OF CLAIM

PLEASE TAKE NOTICE that this Notice of Claim against the City of West Allis and the City of West Allis Police Department is hereby presented on behalf of Jennifer L. Doyle (hereinafter "Doyle") date of birth: April 13, 1976, due to actions and inactions that occurred on May 20, 2015. Doyle resides at 10400 West Plum Tree Circle, #201, Hales Corners, WI 53130. Doyle alleges that her injuries occurred when City of West Allis police officers, James Hartkowski, Todd Ketterhagen, Christopher Sohre, Brian Steffen, Todd Clementi, as well as other police officers who have not yet been identified, breached the ministerial duties imposed upon them by both Wisconsin Statutes, other Wisconsin laws and the applicable policies and procedures of the West Allis Police Department ("WAPD") by delivering a known, dangerous and mentally unstable person who was under arrest to Froedtert Memorial Lutheran Hospital and failing to guard that person named Romell Jackson (hereinafter "Jackson"). In addition to the above identified police officers and/or other agents and employees of City of West Allis or the City of West Allis Police Department failing to stand guard over Jackson, the WAPD's agents and employees failed to properly train WAPD officers consistent with their ministerial duties under Wisconsin law and/or the policies and procedures of the WAPD. As a direct and proximate result of the above identified agents and others as yet unidentified agents of the City of West Allis and/or the City of West Allis Police Department breaching their ministerial duties to stand guard over Jackson during the period of time that he was hospitalized and/or properly

train its agents and officers, Doyle was assaulted by Jackson and sustained physical and emotional injuries as well as other damages. The undersigned is the attorney for Doyle and, as such, is authorized to and present this Notice of Claim for damages on her behalf.

Dated at Milwaukee, Wisconsin, this 16th day of September, 2015.

McGRANAGHAN & STAWSKI LTD.

By:



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

P.O. Address:

McGranaghan & Stawski Ltd.
735 North Water Street
Suite 1222
Milwaukee, WI 53202
(414) 276-8202

NOTICE OF INJURY

PLEASE TAKE NOTICE that on May 20, 2015 and continuing thereafter, Jennifer L. Doyle (hereinafter "Doyle"), date of birth April 13, 1976, sustained physical and emotional injuries as well as other damages when agents of the City of West Allis and/or the City of West Allis Police Department, violated the ministerial duties imposed upon them by the applicable provisions of Wisconsin Statutes, the policies and procedures of the WAPD and other applicable Wisconsin laws which are incorporated by reference herein. As per Sec. 893.80(1)(a), Wis. Stats. notice for said injuries is hereby presented on behalf of Doyle.

STATEMENT OF CLAIM FOR DAMAGES

Past medical expenses (approximately)	\$ 5,000.00
Future medical expenses (approximately)	\$ 5,000.00
Past pain, suffering and disability	\$ 30,000.00
Future pain, suffering and disability	<u>\$ 50,000.00</u>
Total	\$ 90,000.00

WHEREFORE, Doyle demands satisfaction in the amount indicated above against the City of West Allis and the West Allis Police Department because of the above described injuries and damages sustained by her after agents or employees of the City of West Allis and/or the City of West Allis Police Department and its agents/employees breached the ministerial duties imposed upon them in connection with the incident referenced herein.

The undersigned is the agent of Doyle and, as such, is authorized to present and sign this Notice of Injury on her behalf.

Dated at Milwaukee, Wisconsin, this 16th day of September, 2015.

McGRANAGHAN & STAWSKI LTD.

By:



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

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