

FILED  
 09-11-2019  
 John Barrett  
 Clerk of Circuit Court  
 2019CV006984  
 Honorable Jeffrey A.  
 Conen-30  
 Branch 30

**STATE OF WISCONSIN  
 MILWAUKEE COUNTY**

**CIRCUIT COURT  
 CIVIL COURT BRANCH**

*For Official Use:*

GREENFIELD TERRACE LLC  
 P.O. Box 307  
 Oak Creek, Wisconsin 53154,

Plaintiff,

v.

CITY OF WEST ALLIS  
 7525 West Greenfield Avenue  
 West Allis, Wisconsin 53214,

Defendant.

AGENT FOR STATE PROCESS SERVICE, INC.  
 Date of Service: 8/20/19  
 Date of Service: 9/13  
 Served upon:  
 at:  
 [ ] Personal Service [ ] Substitute personal service  
 [ ] Certified service [ ] Other

**RECEIVED**

SEP 13 2019

CITY OF WEST ALLIS  
 CITY CLERK

Case No.:  
 Case Code No.: 30405  
 Other Real Estate

**SUMMONS**

THE STATE OF WISCONSIN, to each person named above as a Defendant:

You are hereby notified that the Plaintiff named above have filed a lawsuit or other legal action against you. The Complaint, which is attached, states the nature and basis of the legal action.

Within twenty (20) days of receiving this Summons, you must respond with a written Answer, as that term is used in Chapter 802 of the Wisconsin Statutes, to the Complaint. The Court may reject or disregard an Answer that does not follow the requirements of the Statutes. The Answer must be sent or delivered to the Court, whose address is **Milwaukee County Courthouse, 901 North 9th Street, Milwaukee, Wisconsin 53233**, and to **SENGSTOCK LAW OFFICE, S.C., attorneys for Plaintiff, whose address is 2514 South 102<sup>nd</sup> Street, Suite 205, West Allis, Wisconsin 53227**. You may have an attorney help or represent you.

If you do not provide a proper answer within twenty (20) days, the Court may grant Judgment against you for the award of money or other legal action requested in the Complaint, and you may lose your right to object to anything that is, or may be, incorrect in the Complaint. A Judgment may be enforced as provided by law. A Judgment awarding money may become a lien against any real estate you own now or in the future, and may also be enforced by garnishment or seizure of property.

Dated at West Allis, Wisconsin, this 10 day of September, 2019.

SENGSTOCK LAW OFFICE, S.C.  
Attorneys for Plaintiff

By: 

MARCUS J. SENGSTOCK  
State Bar No. 1030015

POST OFFICE ADDRESS:

2514 South 102<sup>nd</sup> Street

Suite 205

West Allis, Wisconsin 53227

Phone: 414-321-0078

Fax: 414-321-9040

Email: [msengstock@sengstocklaw.com](mailto:msengstock@sengstocklaw.com)

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CITY OF WEST ALLIS,

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**COMPLAINT**

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NOW COMES the Plaintiff, GREENFIELD TERRACE LLC, by its attorneys, SENGSTOCK LAW OFFICE, S.C., by ATTORNEY MARCUS J. SENGSTOCK, and for a claim for relief against the Defendant alleges and avers as follows:

1. That the Plaintiff, GREENFIELD TERRACE LLC (hereinafter referred to as "Plaintiff"), is a duly organized Wisconsin limited liability company, currently in good standing and with an address of P.O. Box 307, Oak Creek, Wisconsin 53154.
2. That the Plaintiff is the owner of real estate located in the City of West Allis, with an address of 10525 West Greenfield Avenue and Tax Key Number 449-9989-002 (the "Property").
3. That the Property is known as Greenfield Terrace and is a manufactured housing community.
4. That the Defendant, CITY OF WEST ALLIS, has a principal address of 7525 West Greenfield Avenue, West Allis, Wisconsin 53214. The City Clerk is Steven A. Braatz, Jr.
5. That on or about June 10, 2019, the Plaintiff received a Notice of Assessment Letter from the City of West Allis Assessor's Office indicating that, in accordance with Section 70.365 of the Wisconsin Statutes, the assessment for the Property for tax year 2019 had been increased substantially to an assessment of \$2,080,600.
6. That the assessment for year 2018 for the property was \$1,326,900 and the City Assessor's Office indicated that the reason for the assessment change was "revaluation".

7. That, pursuant to the instructions in the Notice of Assessment, the Plaintiff did contact the Assessor's Office to discuss the substantial increase in the Property's assessment, however, the Plaintiff was not able to resolve the assessment issue through conversation and various emails with the City of West Allis and the 2019 assessment figure was not reduced.

8. That on July 9, 2019, the Plaintiff filed a formal Objection to Real Property Assessment with the City of West Allis pursuant to Wisconsin Statutes Section 70.47(7)(a).

9. That the City of West Allis Board of Review (BOR) convened on July 15, 2019 and, at that time, the City Assessor requested a hearing waiver for the Property pursuant to Wisconsin Statutes Section 70.47(8m) because the Property was "unique and is likely to involve a very complex valuation process more well suited for Circuit Court".

10. That the City of West Allis BOR approved the Assessor's request for a hearing waiver and on or about July 18, 2019, the Plaintiff was notified by the City of West Allis, in writing, that the request for BOR review hearing was waived.

11. That the Plaintiff did believe at the time it received the City of West Allis' assessment and continues to believe that the substantial increase for the Property's 2019 assessment is excessive and that evidence has been and will be presented by Plaintiff showing said assessment is excessive and has no factual support.

12. That this action is brought pursuant to Wisconsin Statutes Section 74.37(3)(d).

WHEREFORE, the Plaintiff demands the following relief:

A. A finding by the Court that the City of West Allis Assessor's assessment of the Property is excessive.

B. A determination by the Court as to what the appropriate assessment should be for the Property given all evidence presented by all parties and, if necessary, an order requiring the Property to be reassessed.

C. If 2019 real estate taxes have been paid by Plaintiff to Defendant, based on an excessive assessment, a judgment against the Defendant in an amount to be determined for the excess taxes paid due to said excessive assessment.

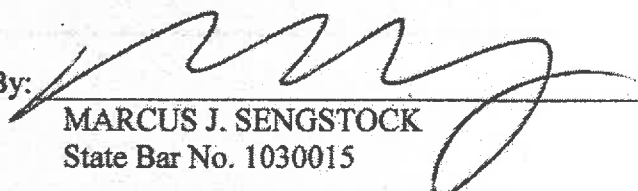
D. Costs and disbursements.

E. Any other relief deemed appropriate by the Court.

Dated at West Allis, Wisconsin, this 10<sup>th</sup> day of September, 2019.

SENGSTOCK LAW OFFICE, S.C.  
Attorneys for Plaintiff

By:



MARCUS J. SENGSTOCK  
State Bar No. 1030015

POST OFFICE ADDRESS:

2514 South 102<sup>nd</sup> Street

Suite 205

West Allis, Wisconsin 53227

Phone: 414-321-0078

Fax: 414-321-9040

Email: [msengstock@sengstocklaw.com](mailto:msengstock@sengstocklaw.com)

STATE OF WISCONSIN

CIRCUIT COURT

MILWAUKEE COUNTY

Greenfield Terrace LLC vs. City of West Allis

**Electronic Filing  
Notice**Case No. 2019CV006984  
Class Code: Other-Real Estate

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09-11-2019

John Barrett

Clerk of Circuit Court

2019CV006984

Honorable Jeffrey A.

Conen-30

Branch 30

CITY OF WEST ALLIS  
7525 WEST GREENFIELD AVENUE  
WEST ALLIS WI 53214

Case number 2019CV006984 was electronically filed with/converted by the Milwaukee County Clerk of Circuit Court office. The electronic filing system is designed to allow for fast, reliable exchange of documents in court cases.

Parties who register as electronic parties can file, receive and view documents online through the court electronic filing website. A document filed electronically has the same legal effect as a document filed by traditional means. Electronic parties are responsible for serving non-electronic parties by traditional means.

You may also register as an electronic party by following the instructions found at <http://efiling.wicourts.gov/> and may withdraw as an electronic party at any time. There is a \$ 20.00 fee to register as an electronic party.

If you are not represented by an attorney and would like to register as an electronic party, you will need to enter the following code on the eFiling website while opting in as an electronic party.

**Pro Se opt-in code: 4db0cc**

Unless you register as an electronic party, you will be served with traditional paper documents by other parties and by the court. You must file and serve traditional paper documents.

Registration is available to attorneys, self-represented individuals, and filing agents who are authorized under Wis. Stat. 799.06(2). A user must register as an individual, not as a law firm, agency, corporation, or other group. Non-attorney individuals representing the interests of a business, such as garnishees, must file by traditional means or through an attorney or filing agent. More information about who may participate in electronic filing is found on the court website.

If you have questions regarding this notice, please contact the Clerk of Circuit Court at 414-278-4120.

Milwaukee County Circuit Court

Date: September 11, 2019