

JUDGE LANG & KATERS, LLC
ATTORNEYS & COUNSELORS AT LAW

July 20, 2017

HAND DELIVERED

Monica Schultz
West Allis City Clerk
West Allis City Hall
7525 W. Greenfield Ave
Milwaukee, WI 53214

RECEIVED

JUL 24 2017

CITY OF WEST ALLIS
CITY CLERK

Re: NOTICE OF CLAIM – JOHN SORGER

Dear Clerk:

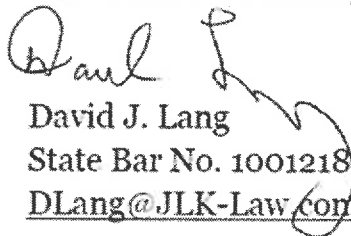
Please find enclosed a Notice of Claim addressed to the following individuals:

- City of West Allis;
- West Allis Police Officers; and,
- All employees, agents, and/or independent contractors performing duties on behalf of the City of West Allis at the Police Department.

If you have any questions please don't hesitate to contact our office. Thank you.

Sincerely,

JUDGE LANG & KATERS, LLC


David J. Lang
State Bar No. 1001218
DLang@JLK-Law.com

DJL/kal
Enclosures

NOTICE OF CLAIM

**TO: Monica Schultz
West Allis City Clerk
West Allis City Hall
7525 W. Greenfield Ave, Room 108
West Allis, WI 53214**

**RECEIVED
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CITY OF WEST ALLIS
CITY CLERK**

**RE: Claimant: John Sorger (9-18-1985)
Address: Milwaukee Secure Detention Facility**

INTRODUCTION

This Notice of Claim is against the City of West Allis, the City of West Allis Police Officers, West Allis Police Department employees, agents, and/or independent contractors as required by Wisconsin Statute § 893.80. Based on the limited information provided to date, despite open records requests, the following individuals participated in and were responsible for the severe injuries suffered by Claimant John Sorger: City of West Allis Police Chief, City of West Allis Inspectors, Majors, Captains, Lieutenants, Sergeants, and Police Officers who were responsible for the care, custody, and treatment of Claimant Sorger for his treatment and arrest in the City of West Allis on the early morning hours of April 10, 2017 in a back alley in the City of West Allis. Pursuant to Wis. Stat. § 893.80, the City of West Allis and all agents, employees, and independent contractors performing duties on behalf of the City of West Allis are hereby on notice of the claims of Claimant. The Claimant seeks monetary relief against the City of West Allis and the above named individuals for the sum of \$1,500,000 and specifically requests the following amounts:

- A. \$500,000 for compensatory damages; and,
- B. \$1,000,000 for punitive damages.

CIRCUMSTANCES OF CLAIM

1. That on April 10, 2017, Claimant Sorger was arrested and handcuffed by a City of West Allis Police Officer on a warrant from his parole for absconding status.
2. That on April 10, 2017, Claimant Sorger was arrested and handcuffed. That he did not resist arrest after being ordered to the ground by West Allis Police Officers.
3. That on April 10, 2017, Claimant Sorger, while handcuffed and on the ground, was kicked and severely beaten by several West Allis Police Officers at approximately 1:45 am. That Claimant was beaten so badly that an ambulance was called and transported Claimant to West Allis Memorial Hospital where Claimant was treated for at least three broken ribs and other fractures, injuries, bruises, and head trauma.
4. That on April 10, 2017, said unknown officers laughed and beat Claimant until he could no longer walk by himself.
5. That to date, the City of West Allis Police Office Department has refused to provide the video and documentation to client on the night in question.
6. That the City of West Allis , City of West Allis Police Department and their employees, agents, and/or independent contractors, violated Claimant's rights as protected by the United States Constitution 42 U.S.C. § 1983, the Wisconsin Constitution, and Wisconsin Statutory Law by being deliberately indifferent to health, welfare, and life of Claimant Sorger.
7. That the City of West Allis and the City of West Allis Police Department failed to properly supervise and train its staff, employees, and agents.
8. That the City of West Allis and the City of West Allis Police Department Officers intentionally beat and battered Claimant, causing permanent injuries, medical bills, patient suffering and other damages including attorney fees and punitive damages for the unnecessary force used on Claimant Sorger.

Dated at Wauwatosa, Wisconsin this 18 day of July, 2017

JUDGE LANG & KATERS, LLC.

By: David J. Lang

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