



May 26, 2016

City Clerk
City of West Allis
11301 West Lincoln Avenue
West Allis, WI 53227

City of West Allis Police Department
c/o Charles Padgett, Chief of Police
11301 West Lincoln Avenue
West Allis, WI 53227

Re: Jennifer Doyle
Wis. Stats. §893.80(1d)(b) claim

RECEIVED

JUN 01 2016

**CITY OF WEST ALLIS
CITY CLERK**

Dear Clerk and Chief Padgett:

On May 20, 2015, Jennifer L. Doyle, an employee of Froedtert Memorial Lutheran Hospital, was assaulted at her workplace by a dangerous and mentally unstable prisoner named Romell Jackson. Jackson had been transported to Froedtert by agents and employees of the City of West Allis and/or the West Allis Police Department. The assault occurred because of the failure of the agents and employees of the City of West Allis and/or the West Allis Police Department to stand guard over Jackson. This failure constitutes a breach of ministerial duty.

Attached please find a Notice of Claim and Notice of Injury which Ms. Doyle's counsel sent to the City of West Allis and the City of West Allis Police Department on September 16, 2016. This document fully described the facts of the incident. It establishes both the cause of Ms. Doyle's injuries, and the liability of the City of West Allis, and the West Allis Police Department. However, on November 6, 2015, the City of West Allis denied Ms. Doyle's claims in full.

Froedtert's worker's compensation carrier is Sentry Casualty Company. This letter shall serve as Sentry's claim, as required by Wis. Stats. §893.80(1d)(b). Sentry's address is:

Sentry Casualty Company
c/o Ron Harmeyer Law Office, LLC
117 N. Jefferson Street, Suite 201
Milwaukee, WI 53202

Pursuant to Wis. Stat. §102.29, Sentry's right to recover damages from the responsible party/parties are the same as those of Ms. Doyle herself. The itemized statement of the relief sought by Sentry is as follows:

West Allis City Clerk

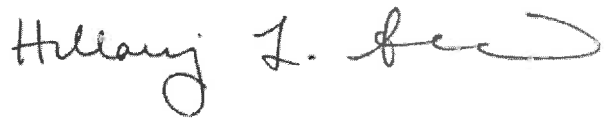
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Past medical expenses (approximately)	\$6,742.87
Future medical expenses (approximately)	\$5,000
Past pain, suffering and disability	\$30,000
<u>Future pain, suffering and disability</u>	<u>\$50,000</u>
Total	\$91,742.87

Any questions regarding this claim can be directed to the undersigned, or to Attorney Ron Harmeyer, at (414) 316-2500. Thank you.

Very Truly Yours,



Hillary L. Annin

HLA/ms

Enc.

cc: Attorney Christopher J. Stawski

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.

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

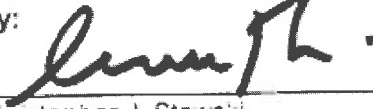
WHEREFORE, Doyle demands satisfaction in the amount indicated above against the City of West Allis and the West Allis Police Department because of the above described injuries and damages sustained by her after agents or employees of the City of West Allis and/or the City of West Allis Police Department 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

P.O. Address

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



OFFICE OF THE CITY CLERK

Monica Schultz
City Clerk

NOTICE OF DISALLOWANCE OF CLAIM

November 6, 2015

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Jennifer L. Doyle
10400 W. Plum Tree Circle, #201
Hales Corners, WI 53130

Re: Your Claim Against the City of West Allis submitted by Attorney Stawski
Date of Loss: May 20, 2015

Dear Ms. Doyle:

At its meeting on November 3, 2015, the Common Council of the City of West Allis considered your claim received on September 16, 2015, regarding injuries allegedly sustained by a failure to act on the part of the West Allis Police Department and denied it in full.

Please be advised that no lawsuit may be brought on this claim against the City of West Allis or any of its officials, officers, agents or employees after six (6) months from the date of receipt of this letter.

Sincerely,

Monica Schultz
City Clerk

cc: Attorney Christopher Stawski
City Attorney's Office
City Clerk's Office

MS:kp