

II

R. O. No. 113 - 21 - 22. By City Clerk. January 4, 2022.

Submitting a Notice of Claim from Patrick A. Gillette for alleged damages with regard to alleged misconduct by City employees.

FP

CITY CLERK

PATRICK A. GILLETTE
915 NORTH AVENUE
SHEBOYGAN, WI 53893

PLAINTIFF

City Hall
DEC 20 '21 AM 8:11

claim# 21-21

CITY ATTORNEY, CHARLES ADAMS
CITY HALL
828 CENTER AVENUE
SHEBOYGAN, WI 53081

ATTORNEY FOR RESPONDENTS
CITY OF SHEBOYGAN
COUNTY OF SHEBOYGAN
STATE OF WISCONSIN

NOTICE OF CLAIM

Now comes the Plaintiff, Patrick A. Gillette, who claims injury by the intentional individual acts of malice, misconduct, malfeasance, and conspiracy to act in concert with each other by the following respondents:

1. City Attorney, Charles Adams
2. Director of Human Resources, Vicki Schneider
3. City Clerk, Meredith De Bruin
4. Robert Lettre, President of the Police and Fire Commission
5. Christopher Domalgalski, Chief of Police
6. Kurt Zempel, Captain of the PD Patrol Division
7. Michael Stelter, Lt. of the PD Patrol Division
8. Kendra Zipperer, Officer of the PD Patrol Division

Pursuant to Wis. Stat. 893.82, this claim for damages to include time and materials, and pain and suffering, not to exceed \$50,000. The immunity clause is hereby waived on the bases of intentional acts performed by the respondents.

Notwithstanding SS 893.82, plaintiff claims all rights under:

1. The Constitution of the State of Wisconsin, Article I, Section 9
2. The Constitution of the State of Wisconsin, Article I, Section 9(m)

3. Federal Rights under:

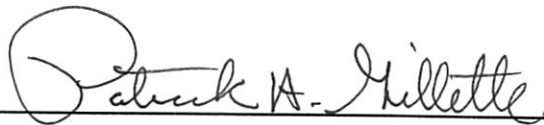
- a. USC Title 42, Section 1983 Civil Action for Deprivation of Rights
- b. USC Title 42, Section 1985 Conspiracy to interfere with Civil Rights
- c. USC Title 42, Section 1986 Action for neglect to prevent

Plaintiff further reserves all rights, included but not enumerated in this claim to exercise his rights to extend beyond the limitations of SS 893.82.

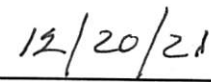
Plaintiff complains that individual acts, and acts in consortium, were performed by the respondents since October 4, 2021, causing injury and civil rights violations whereby:

1. On October 4, 2021, the Plaintiff did file a Verified Formal Complaint, directed and addressed to the President of the Police and Fire Commission.
2. On October 4, 2021, said complaint was filed with the Director of Human Resources and with the City Clerk, at 828 Center Avenue, Sheboygan, Wisconsin.
3. That said complaint was directed by the Director of Human Resources and the City Clerk to the City Attorney and not to the PFC President.
4. That the City Attorney and the President of the Police and Fire Commission failed to act on said complaint.
5. That all stated respondents conspired to intentionally interfere with the process of that complaint.
6. That by these actions the conspirators have delayed and caused injury and civil rights violations to the plaintiff.

The Plaintiff personally filed this Notice of Claim to the Office of the City Clerk, 828 Center Avenue, Sheboygan, WI 53081, on December 20, 2021, and within the 120 days specified in SS 893.82.



Signed



Dated

PATRICK A. GILLETTE
915 NORTH AVENUE
SHEBOYGAN, WI 53893

PLAINTIFF

CITY ATTORNEY, CHARLES ADAMS
CITY HALL
828 CENTER AVENUE
SHEBOYGAN, WI 53081

ATTORNEY FOR RESPONDENTS
CITY OF SHEBOYGAN
COUNTY OF SHEBOYGAN
STATE OF WISCONSIN

NOTICE OF CLAIM: SUPPLIMENTAL AMENDMENT

Now comes the Plaintiff, Patrick A. Gillette, who claims injury by the intentional individual acts of malice, misconduct, malfeasance, and conspiracy to act in concert with each other by the following respondents:

1. City Attorney, Charles Adams
2. Director of Human Resources, Vicki Schneider
3. City Clerk, Meredith De Bruin
4. Robert Lettre, President of the Police and Fire Commission
5. Christopher Domalgalski, Chief of Police
6. Kurt Zempel, Captain of the PD Patrol Division
7. Michael Stelter, Lt. of the PD Patrol Division
8. Kendra Zipperer, Officer of the PD Patrol Division

AMMENDED TO ADD TO THE RESPONDENT'S LIST

1. Ryan Sorenson, Mayor of the City of Sheboygan
2. Dean Dekker, Alderman and Chairman of the Common Council Committee of the Whole for the City of Sheboygan

AMMENDED TO ADD PLAINTIFF'S ADDITIONAL CLAIM OF INJURIES

1. The additional Respondents had prior knowledge of, and the ability to prevent, such injuries.
2. That all Respondents, in concert, did in fact cause the injury to the Plaintiff of defamation of character.

A copy of the Original Notice of Claim, filed on December 20, 2021, is attached.

AMMENDED TO ADD LIST OF CLAIMS SUPPLIMENTAL TO THE ORIGINAL NOTICE OF CLAIM:

1. Research and preparation of 12 documents at \$200.00 each = \$2400.00
2. Miscellaneous communications with respondents and other related witnesses. 24 hours at \$100.00 per hour = \$2400.00
3. Office materials and postage = \$200.00
4. Travel expenses: Auto and travel time. 8 hours at \$100.00 per hour = \$800.00
5. Violation of Civil Rights injuries and Injury of Defamation of Character.

Total Claim of Injuries = \$50,000

I ATTEST AND VERIFY THAT I HAVE PERSONNALLY DELIVERED PERSONAL COPIES OF THE ORIGINAL NOTICE OF INTENT, AND PERSONAL COPIES OF THE SUPPLIMENTAL AMMENDMENT TO THE NOTICE OF CLAIM, TO THE AGENT ADDRESS OF THE FOLLOWING RESPONDENTS, AT 828 CENTER AVENUE, CITY HALL FOR THE CITY OF SHEBOYGAN.

1. City Attorney, Charles Adams
2. Director of human resources, Vicki Schneider
3. City Clerk, Meredith De Bruin
4. Robert Lettre, President of the Sheboygan Police and Fire Commission
5. Ryan Sorenson, Mayor of the City of Sheboygan
6. Dean Dekker, Alderman and Chairman of the Common Council Committee of the Whole

I FURTHER ATTEST AND VERIFY THAT COPIES OF THIS VERY SAME NOTICE OF INTENT AND SAID SUPPLIMENTAL AMMENDMENTS TO THE NOTICE OF INTENT WERE PERSONALLY DELIVERED BY MYSELF, THE PLAINTIFF, TO THE AGENT

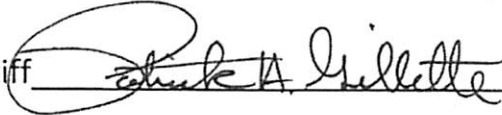
ADDRESS OF THE RESPONDENTS OF THE CITY OF SHEBOYGAN POLICE
DEPARTMENT, LOCATED AT 1315 n. 23RD STREET, CITY OF SHEBOYGAN, WI
53081.

RESPONDENTS OF THE SHEBOYGAN POLICE DEPARTMENT

1. Christopher Domalgalski, Chief of Police
2. Kurt Zempel, Captain of Patrol
3. Michael Stelter, Lt. of Patrol
4. Kendra Zipperer, Patrol Officer

ATTESTED TO AND VERIFIED THIS 29TH DAY OF DECEMBER 2021

Patrick A. Gillette, Plaintiff



A handwritten signature in black ink, appearing to read "Patrick A. Gillette", is written over a horizontal line.