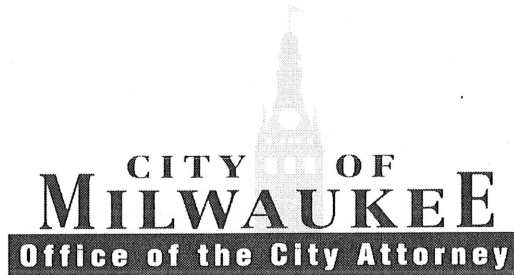


GRANT F. LANGLEY
City Attorney

MIRIAM R. HORWITZ
ADAM B. STEPHENS
MARY L. SCHANNING
JAN A. SMOKOWICZ
Deputy City Attorneys



Milwaukee City Hall Suite 800 • 200 East Wells Street • Milwaukee, Wisconsin 53202-3551
Telephone: 414.286.2601 • TDD: 414.286.2025 • Fax: 414.286.8550

SUSAN E. LAPPEN
PATRICIA A. FRICKER
HEIDI WICK SPOERL
GREGG C. HAGOPIAN
JAY A. UNORA
KATHRYN Z. BLOCK
KEVIN P. SULLIVAN
THOMAS D. MILLER
ROBIN A. PEDERSON
JEREMY R. MCKENZIE
PETER J. BLOCK
JENNY YUAN
ALLISON N. FLANAGAN
HEATHER H. HOUGH
ANDREA J. FOWLER
PATRICK J. MCCLAIN
NAOMI E. GEHLING
CALVIN V. FERMIN
BENJAMIN J. ROOVERS
ELLENY B. CHRISTOPOULOS
RACHEL S. KENNEDY
TYRONE M. ST. JUNIOR
HANNAH R. JAHN
SAVEON D. GRENELL
JULIE P. WILSON
GREGORY P. KRUSE
KIMBERLY A. PRESCOTT
SHEILA THOBANI
KATRYNA C. RHODES
NICOLE F. LARSEN
JAMES M. CARROLL
WILLIAM G. DAVIDSON
MEIGHAN M. ANGER
ALEXANDER R. CARSON
Assistant City Attorneys

May 29, 2019

To the Honorable Common Council
Of the City of Milwaukee
Room 205 – City Hall

Re: Proposed Resolution Authorizing an Offer of Judgment in
Sterling D. Brown v. City of Milwaukee, et al.,
Case No. 18-C-0922

Dear Council Members:

Enclosed please find a proposed resolution. We ask that it be introduced and referred to the Committee on Judiciary and Legislation with the following recommendation.

Sterling Brown has filed a lawsuit seeking an unspecified amount of damages arising from the conduct by Milwaukee police officers during an incident that occurred on January 26, 2018 in a pharmacy parking lot in the city of Milwaukee. While the only relief available to Mr. Brown in such litigation is monetary damages, Mr. Brown and his counsel have expressed concern that the city and its police department engage in efforts to reform and improve relations between the department and local communities.

It is our understanding, however, that the city and its police department have undertaken significant efforts both at improving the department and improving relations with various communities within the city in the aftermath of this incident. These efforts include the following measures undertaken by the police department: 1) additional training relating to fair and impartial policing; 2) additional training in supervisory skills, and 3) police department supervisory review of officer body camera footage. In addition there have been efforts to reestablish the Police Athletic League. Aside from just the department itself, the city has joined with the Milwaukee Bucks and the Milwaukee Public Schools to create MENTOR Greater Milwaukee.

As noted above, the sole relief available in the lawsuit brought by Sterling Brown is the award of monetary damages and attorneys' fees. Settlement efforts in the litigation to



To the Honorable Common Council
Of the City of Milwaukee
May 29, 2019
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date have not proved successful. We therefore request that the Common Council authorize this office to submit an Offer of Judgment in the above-noted case pursuant to Rule 68 of the Federal Rules of Civil Procedure in the amount of \$400,000 to pay for all damages, attorneys' fees and costs in the case to bring the matter to a close. We submit that this would be the most expeditious means to avoid attorneys' fees and costs spent unnecessarily in the litigation of the matter and have enclosed a proposed resolution to that effect.

Very truly yours,



GRANT E. LANGLEY
City Attorney



JAN A. SMOKOWICZ
Deputy City Attorney

Enclosure

1032-2018-1356:259780