

Cullen Bogan Witness Statement, Nov 30, 2023

I don't remember exactly when, but around the first week or two of September 2021, my mother called me mentioning that her basement had flooded. At that point I didn't know the extent and didn't think much of it. Although the odd thing about it was, it had not rained recently, so we discussed and debated as to what may have been the cause of the flooding. We arrived at the conclusion that it probably would have to be some kind of pipe leaking, since it hadn't rained. After ending the call, my mother went on to call the city water department to investigate a possible leak.

A week or two later my mother then called me back a week or so later in a much more frantic and stressed manner. The basement had continued to flood since we last spoke. She was running up and down the stairs wet vacuuming every handful of hours, sleeping extremely poorly, and immensely frustrated. More furniture and stored items were continuing to be damaged, and at this point she asked me to come and help her move all of the damaged items out of the basement, and move the remaining items as far away from the West wall as possible, in an attempt to prolong the amount of time she would have in between trips to the basement to continually wet-vacuum the water. I believe this call happened somewhere around the weekend of Sept 17th-19th. As I'm a professional musician in Chicago, I couldn't come up to Milwaukee during the weekend when most of my work was, so I had to come up on Tuesday the 21st.

While waiting for a recall fix on my car Tuesday morning, I did some quick research on my phone for waterproofing companies. My mom had mentioned that the City Water Dept. had come out and had not found a leak, so we were at this point unsure what could be causing the water to continue seeping in. My thought was, regardless of where it's coming from, the best thing we can do is attempt to waterproof the basement, so wherever it's coming from – it can't get in. My mom told me the City had also suggested contacting a waterproofing company when they came out for the initial search of the leak and came up empty handed.

I then went up to Milwaukee and helped my mom clear the damaged items. This was the first time I saw the extent of the damage. Water was seeping from the South-west wall, seemingly from the bottom. The wood-paneling in the barroom was waterlogged about a foot or two from the ground. Water was seeping from the North-west wall, the main basement room, and this was where most of the damaged furniture was. The North wall, the North-east wall, and the East wall, were mostly dry. The south wall had a small amount of seepage. This indicated that wherever it was coming from, it was coming from the West side of the house. I finished moving out the damaged items, helped move the undamaged items further to the east side of the house (since it was dryer there), helped my mother wet-vacuum the remaining water, and I believe we laid down some towels she bought in bulk from goodwill (this may have come later). I then stayed the night and planned to leave in the morning to get back to Chicago as I had another contract that evening I had to work. I got up in the morning and went down to swap out the towels and wet-vac again, and I remember being surprised at the amount of water that had come in. I finished that and prepared to leave. I remember telling my mother, "All we can do at the moment is call a waterproofing company and get them here as soon as possible to solve this."

I went back to Chicago, and she began calling a number of waterproofing companies. Eventually Everdry was the company that responded quickest and was able to come out to give a quote the soonest. She wound up signing a contract with them to install drain tiles inside, and

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some sort of secondary system on the outside as well, as well as an anti-mold sort of unit. It was expensive, but I thought, at least we had a solution. My mother then called later that week and informed me of Everdry's plan and told me they needed her to clear a 2- or 3-foot perimeter around the outer walls – as they would be drilling down to install the drain tile. She asked me if I could come back again to help move everything away from the walls, and clear as much as we could from the basement. Again – I had contracts all through the weekend and Monday, so I had to come up that following Tuesday the 28th.

I arrived on the 28th to find my mother and older brother had constructed a dam out of sandbags to help contain the water, so it would not damage more items, and she couldn't move the items herself. It was also to help reduce the number of times she would have to come down to wet-vac and clean. This was the status quo for the next few days, until the Everdry consultant could come out.

Once the Everdry consultant came out, it was discovered that the house already had interior drain tiles, and the consultant flipped a valve that wasn't open and water came rushing into the drain in the southeast laundry room. This is what my mom told me. She then told me the puddles dissipated a bit – but water was still coming in, but at least it was more manageable with her homemade dam and army of goodwill towels. I figured, great, manageable until Everdry can do whatever they need to do to waterproof the home for good. I didn't actually see the drain tiles in action until my wife and I came up for Thanksgiving a few days early to accompany her to her cancer diagnosis appointment. When we went down to check out the basement, my mother showed me the newly discovered palmer valve, and sure enough I watched as water continuously trickled into the sewer pipe. And sure, enough she showed me the dam, still with sopping wet towels that she had put down earlier that day. It was more manageable yes, but water was still seeping in from that Western wall. The drain tiles were clearly not enough. We left after Thanksgiving, after helping clean the towels, wet-vac, etc. I wished her luck and told her to have patience, hopefully the Everydry treatment will fix the problem.

All this time she insisted it had to be a pipe and continued to call and argue with the city to come and investigate further. The city had come up multiple times and found nothing. It was a mystery as far as they were concerned. She continued calling and asking them to investigate in different spots, namely the western side of the house (Linebarger), but it seemingly fell on deaf ears. They had opened and investigated the south side of the house (Iron) but found nothing.

Around the beginning of December, my mom called me again – they had found the leak. A man that she had been having help her with yardwork and noticed an area where water was bubbling up from. She took this new information to the city, and they eventually came out to investigate and found the leak. The leak was repaired, and sure enough the remaining standing water dried up. The palmer valve also stopped trickling water into the sewer pipe.

Had this leak been found sooner and had my mother's insistence to investigate the western side of the house not fallen on deaf ears, I can only imagine that the damage would have only been a small fraction of what actually occurred. And the contract with Everdry would never have been necessary. And all the turmoil that followed the initial discovery could have been avoided.

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