

ORIGINAL

NOTICE OF CLAIM FOR DAMAGES

CITY OF MILWAUKEE

EMMA JEAN GLASS AND  
SAMMIE LEE GLASS  
3302 N. 29<sup>th</sup> Street  
MILWAUKEE, WI 53216-0000

NOV 28 PM 9:30

OFFICE OF  
CITY ATTORNEY

Complainants,

-v-

MARTY COLLINS, COMMISSIONER  
DEPARTMENT OF NEIGHBORHOOD SERVICES

-AND-

CITY OF MILWAUKEE  
City Clerk  
200 E. Wells Street  
MILWAUKEE, WI 53202

CITY OF MILWAUKEE  
07 NOV 28 PM 2:18  
CITY CLERK

Respondents.

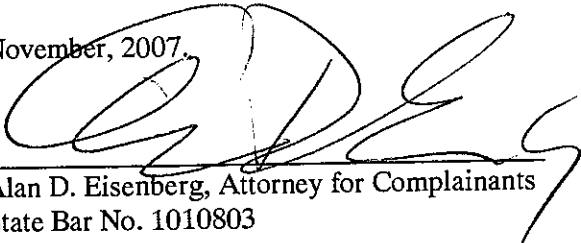
TO: City Clerk, Common Council  
City of Milwaukee  
200 E. Wells Street  
MILWAUKEE, WI 53202

Emma Jean Glass and Sammie Lee Glass, by their attorney Alan D. Eisenberg, submits the following as and for their Notice of Claim for Damages:

1. Complainant alleges and complains that over the past year, Complainant and/or his wife, co-owners of the above residence have been harassed by and served with several zoning and or building code violation complaints by the Department of Neighborhood Services, specifically one inspector, Angela Ferrill, which Complainant believes to be a continuous harassment for one reason or another. In the two most recent cases, the matters have been adjudicated in Milwaukee Municipal Court and dismissed with prejudice; in other prior cases the matters were concluded in favor of complainants;
2. Further, Complainants allege and complain that the complaints and violations were issued totally without merit and in total contradiction to the true facts of the matters;
3. Complainants further allege and complain that the continual harassment by the DNS and its inspector Angela Ferrill and/or departmental officials and supervisors, have resulted in an abuse of authority by the DNS and its employees and have further caused Complainants needless inconveniences and a disruption in their daily lives for over the past year;
4. Complainants further allege and complain that the continual harassments have caused complainants to expend sums of money defending these actions which have no basis in fact and are in contradiction to the ordinances in effect;
5. Complainants further allege and complain that the continuation of these efforts on the part of the Department of Neighborhood Services and its employees amounts to vicious harassment and is in violation of the owners' rights to quiet enjoyment as law-abiding, taxpaying citizens of the City of Milwaukee;

4. Complainants pray for immediate cease and desist orders and seek damages and compensation in the amount of fifty thousand (\$50,000.00) dollars and punitive damages in the amount of fifty thousand (\$50,000.00) dollars and any other such just and equitable relief as may be granted, including the employment termination of the inspector.

Dated at Milwaukee, Wisconsin this 28th day of November, 2007.



Alan D. Eisenberg, Attorney for Complainants  
State Bar No. 1010803

APPROVED BY:



SAMMIE LEE GLASS

P.O. Address:

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