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June 8, 2006

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

Re: Claim of Robert Ragsdale

Dear Council Members:

We return the enclosed document, which has been filed with the City Clerk, and ask that it be introduced and referred to the Committee on Judiciary and Legislation with the following recommendation:

Claimant Robert Ragsdale alleges that on November 3, 2001, he was assaulted by former police officer Kerry Washington. Mr. Ragsdale's nose was broken, and he suffered hemorrhaging in his eye, along with bruising, scratches and scrapes. Former Officer Washington was terminated from the Milwaukee Police Department, as a result of his actions toward Mr. Ragsdale.

Mr. Ragsdale has sustained medical bills, totaling over \$6,000.00 to date. He did suffer a broken nose and hemorrhaging in his eye. Were the City to go to trial, it would be exposed to the possibility of a judgment for Mr. Ragsdale's compensatory damages, which would include his medical bills and his pain and suffering, punitive damages, and attorney's fees, which alone could exceed \$50,000.00.

We engaged in settlement discussions with counsel for Mr. Ragsdale, after his claim was filed with the City. The parties have agreed on a settlement amount of \$45,000. Based upon the above discussion, we strongly recommend that this case be settled for \$45,000 at this time, to avoid the risks associated with proceeding to trial, and the potential exposure to payment of damages and attorney's fees. Because settlement of this matter is deemed expeditious to the City of Milwaukee,


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we recommend payment of this claim, and have enclosed an appropriate resolution for your convenience.

Very truly yours,



GRANT F. LANGLEY
City Attorney



SUSAN E. LAPPEN
Assistant City Attorney

SEL:dms

Enc.

1032-2002-675:106343