

City of Milwaukee
Office of the City Attorney
City Attorney Evan C. Goyke
Investigator Adjuster Patricia Klosiewski
March 23, 2025

CITY OF MILWAUKEE
2025 MAR 24 PM 1:10
CITY CLERK'S OFFICE

Dear Attorney Goyke and Investigator Adjuster Klosiewski,

I am writing to formally request a hearing with the Milwaukee City Clerk's office to appeal the decision of C.I. File No. 1029-2024-2064 regarding reimbursement for the cost of four tire replacements due to city construction. The investigation was conducted in the incorrect area. In the respondent letter from the city of Milwaukee (attached), the investigation was conducted at 922 E. Howard Ave despite sharing in the original request the site of construction being the 200 block of E. Howard Avenue (between Howell and Whitnall avenue), exact address of 231 E. Howard Avenue (same address as mailed response from the Office of the City Attorney).

There was ongoing construction occurring before, after and during the shared date of 7/1/24 (date of tire replacement completion) – particularly on south side of Howard Avenue, at that time only the north side of Howard Avenue was open for two-way traffic. I have also included a screen shot of Howard Avenue via google maps visually describing it as it was (at least) during 6/18/24-7/12/24. The green lines show the open lanes which permitted public traffic, the red line represents the closed lane of which construction took place and the orange line represents the route of construction vehicles used to park and/or remove gravel waste. Which shows the cause of exposed gravel on the drivable road(s) during this time.

In addition to the google maps screen shot describing the construction at the time, I have included screenshots from an apple iPhone showing construction took place in front of my home during referenced dates. The evidence shows the following:

1. The first screenshot (picture 1, taken 6/18/24) shows the south side of Howard Avenue being demolished for updates.
2. The second screenshot (picture 2, taken 6/18/24) shows movement of construction occurring at the intersection of Howard Avenue and Austin Street, as well as orange cones along Austin Street indicating where construction vehicles parked and drove through for disposing of and moving gravel/other materials.
3. The third screenshot (picture 3, taken 7/12/24) showing a gravel pile identical to the piece of which was lodged in my tire; and construction continuing beyond forementioned dates.
4. The fourth screenshot (picture 4, taken 6/28/24), additional copy of tire with gravel stone lodged in back passenger tire as mentioned in original request.

Also included: response letter from the Office of the City Attorney and copy of the post marked envelope as requested.

As mentioned in my original letter, I greatly appreciate your time and consideration for this is a one-time request. Please let me know if there is any additional information needed. I can be reached directly via email at soniaescamilla94@gmail.com or phone at 414-801-6517.

Kind regards,

Sonia C. Escamilla

Sonia Escamilla

OFFICE OF CITY ATTORNEY
25 MAR 25 PM 12:34



231 E Howard Ave

Building



231 E Howard Ave, Milwaukee, WI 53207

Suggest an edit on 231 E Howard Ave

Add a missing place

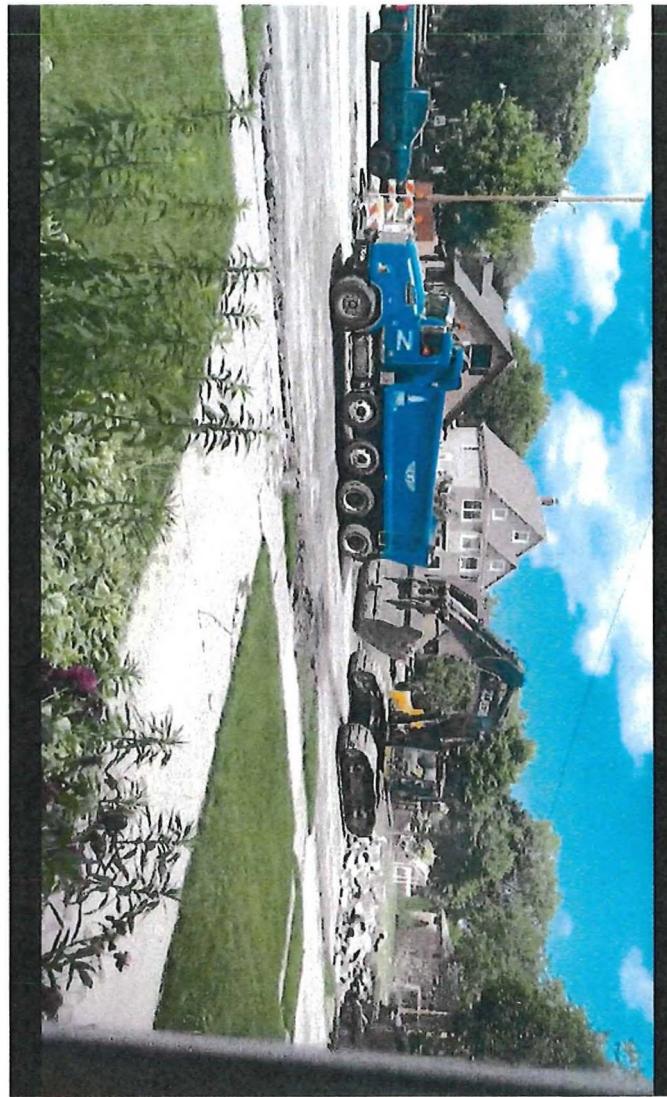
Add your business

Add a label

Your Maps activity

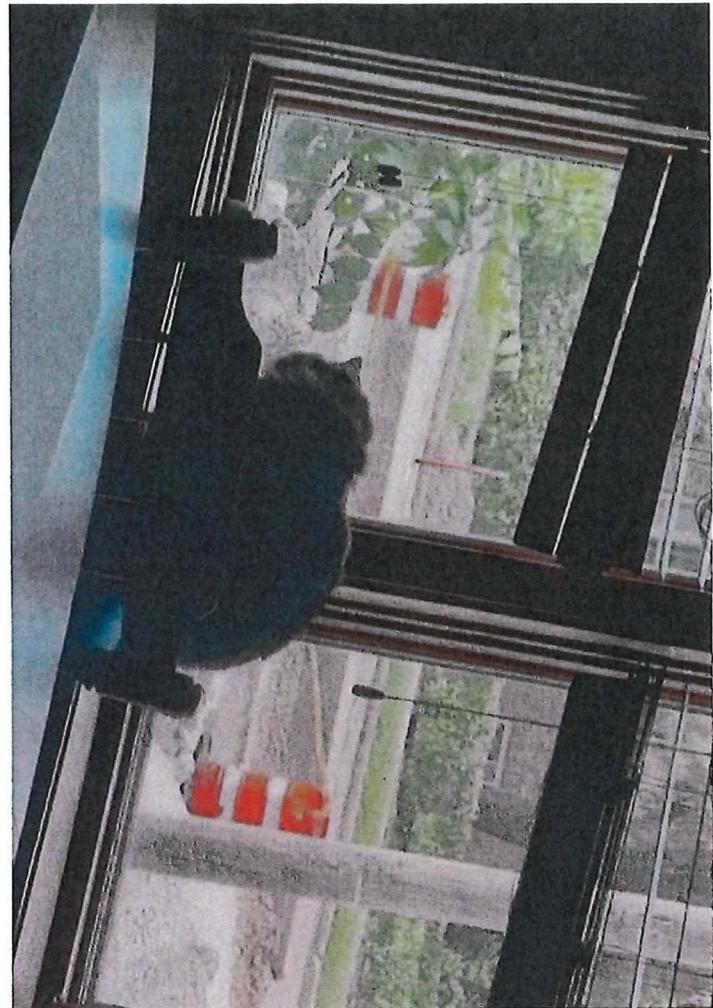


Picture 1: (6/18/24)



Picture 2: (6/18/24)





Picture 3: (4/12/24)

Picture 4. (61 to 81 mm)



Sonia Gianni
231 E. Howard ave.
Milwaukee, WI - 53207

City of Milwaukee
Office of the City Attorney - 800 City Hall
200 E. Wells St.
Milwaukee, WI - 53202-3551

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CITY CLERK'S OFFICE

EVAN C. GOYKE
City Attorney

MARY L. SCHANNING
ROBIN A. PEDERSON
NAOMI E. SANDERS
JULIE P. WILSON
Deputy City Attorneys

**CITY OF
MILWAUKEE**
Office of the City Attorney

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JUSTIN J. DREIKOSEN
Assistant City Attorneys

February 11, 2025

*Mailed
3/4/2025*

Ms. Sonia Escamilla
231 East Howard Avenue
Milwaukee, WI 53207

RE: Communication from Sonia Escamilla
C.I. File No. 1029-2024-2064

Dear Ms. Escamilla:

The City of Milwaukee is in receipt of the claim for damages incurred as a result of gravel and rocks in the street in the area of 922 East Howard Avenue on or around July 1, 2024.

Our investigation into this matter reveals that the City of Milwaukee was not engaged in any work or repair activity in the above-referenced location on the day in question. Construction activity in that area on the day in question was related to the roadway construction work being done under contract from Wisconsin Department of Transportation (WisDOT) by Zignego Company, Inc. This work was being done under WisDOT Project ID 2395-05-71.

Per the Sewer and Water Construction Specifications of this contract, the City is held harmless from all liability for damages related to the digging up, use, or occupancy of the street. As such, the City would not be liable for damages in this case, and we are denying your claim.



Ms. Sonia Escamilla
February 11, 2025
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If you wish to appeal this decision, you may do so by sending a written statement requesting a hearing within 21 days of the postmarked date of this letter to the Milwaukee City Clerk, 200 East Wells Street, Room 205, Milwaukee, Wisconsin 53202. Please include a photocopy of this letter's envelope, showing the postmark, and retain the original in the event further proof is needed.

Very truly yours,



EVAN C. GOYKE
City Attorney



PATRICIA KLOSIEWSKI
Investigator Adjuster

ECG/PK/cdr

1029-2024-2064/296225



The logo for the City of Milwaukee Office of the City Attorney. It features the words "CITY OF" in a small, bold, serif font above the word "MILWAUKEE" in a large, bold, serif font. Below "MILWAUKEE" is a horizontal line. Underneath the line, the words "Office of the City Attorney" are written in a bold, sans-serif font. Below this, the words "OFFICE OF THE CITY ATTORNEY" are written in a smaller, bold, sans-serif font. At the bottom, the address "800 City Hall" and "200 East Wells Street" are listed, followed by "Milwaukee, Wisconsin 53202-3551" in a smaller font.

Ms. Sonia Escamilla
231 East Howard Avenue
Milwaukee, WI 53207

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PERSONAL
FIRST CLASS