

OFFICE OF THE CITY CLERK  
MILWAUKEE, WISCONSIN  
200 E Wells Street, Room 205  
Milwaukee, WI 53202

STEVE REUPERT  
1630-1632 N 60TH ST  
MILWAUKEE, WI 53208  
(630) 703-8443  
[sreupert@gmail.com](mailto:sreupert@gmail.com)

Plaintiff,

vs.

CITY OF MILWAUKEE

Defendant.

CITY OF MILWAUKEE  
2021 SEP 19 PM 3:09  
CITY CLERK'S OFFICE

### STATEMENT OF CLAIM

On Tuesday, August 10th at approximately 8:10 PM a storm came to Milwaukee with winds strong enough to deroot trees. A tree owned by the city of Milwaukee, that lies between the sidewalk and street, directly in front of the plaintiffs address (1630-1632 N 60th St, Milwaukee, WI 53208) was derooted and fell on the home. Damages from the tree to the home include, but may not be limited to, gutters, facia, flashings, railing, shrubs, lawn, structural, siding, and drywall.

PLAINTIFF, STEVE REUPERT is seeking relief for the damages caused by the tree in the sum of \$28,548.33 from the THE CITY OF MILWAUKEE.

Included within this statement of claim are 3 estimates to repair the damage. One of the estimates includes pictures and damages caused when city tree struck the home at 1630-1632 N. 60th St., Milwaukee, WI 53208

I, STEVE REUPERT, can be contacted at the address above, by phone (630) 703-8443, or email, sreupert@gmail.com for any questions regarding the incident.

OFFICE OF CITY ATTORNEY  
10 SEP 21 PM 08:17

  
← (Steven G. Reupert) 9-3-21 (Date) →

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Client: Steve Reupert  
Home: 1630-1632 N 60 Street  
Milwaukee, WI 53208

Home: (630) 703-8443

Operator: AFRESHLO

Estimator: MaryJo Parbs  
Company: A Fresh look Restoration, Remodeling  
Business: 8822 W Lincoln Ave  
West Allis, WI 53227-2408

Business: (414) 448-6228  
E-mail: afreshlookrestoration@gmail.com

Type of Estimate: hail and wind damage  
Date Entered: 8/17/2021

Date Assigned:

Price List: WIMW8X\_AUG21  
Labor Efficiency: Restoration/Service/Remodel  
Estimate: 2021-08-17-1445

2021-08-17-1445

2021-08-17-1445

DESCRIPTION	QTY	UNIT PRICE	TOTAL
1. General Demolition - per hour	27.00 HR @	53.58 =	1,446.66
2. R&R 1/2" drywall - hung, taped, floated, ready for paint	28.00 SF @	3.34 =	93.52
4. Painters - per hour	32.00 HR @	69.80 =	2,233.60
6. Soffit & Fascia Installer - per hour	8.00 HR @	125.17 =	1,001.36
10. R&R Drip edge/gutter apron	1,619.00 LF @	3.22 =	5,213.18
12. R&R Gutter / downspout - aluminum - 6"	55.00 LF @	13.22 =	727.10
14. Gutter / downspout - Detach & reset	55.00 LF @	6.07 =	333.85
41. R&R Porch or deck handrail w/turned balusters	36.00 LF @	42.93 =	1,545.48
40. Painter - per hour	24.00 HR @	69.80 =	1,675.20
39. General clean - up	7.00 HR @	42.81 =	299.67
38. Clean siding - metal or vinyl	3,000.00 SF @	0.34 =	1,020.00
37. Prime & paint metal siding	3,000.00 SF @	0.93 =	2,790.00
36. Paint column - two coats	24.00 LF @	3.89 =	93.36
17. R&R Soffit - metal	42.00 SF @	7.94 =	333.48
43. Upper deck porch. Not sure what the structural engineer will recommend.	1.00 EA @		0.00
18. R&R Fascia - metal - 6"	68.00 LF @	6.67 =	453.56
19. R&R Wood column - 12" diameter	12.00 LF @	65.86 =	790.32
21. R&R Rubber roofing - Fully adhered system - 60 mil	1.00 SQ @	637.32 =	637.32
24. Electrician - per hour	2.00 HR @	110.00 =	220.00
34. Aluminum rake/gable edge trim - mill finish	11.00 LF @	5.23 =	57.53
26. Structural engineer residential evaluation fee	1.00 EA @	500.00 =	500.00
27. Precast railing	12.00 LF @	42.32 =	507.84
29. Tree - removal - per hour (Labor only)	1.00 HR @	53.58 =	53.58
30. Clean tree (potted) - large	1.00 EA @	44.13 =	44.13
32. Plants - shrubs - deciduous - 5 gallon	3.00 EA @	80.40 =	241.20

**Labor Minimums Applied**

DESCRIPTION	QTY	UNIT PRICE	TOTAL
3. Drywall labor minimum	1.00 EA @	407.81 =	407.81
25. Electrical labor minimum	1.00 EA @	55.00 =	55.00

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**Summary**

Line Item Total	22,774.75
Permit	500.00
Material Sales Tax	249.10
Services Mat'l Tax	1.51
	<hr/>
Subtotal	23,525.36
Overhead	2,352.56
Profit	2,587.80
Service Sales Tax	82.61
	<hr/>
<b>Replacement Cost Value</b>	<b>\$28,548.33</b>
<b>Net Claim</b>	<b>\$28,548.33</b>
	<hr/> <hr/>

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MaryJo Parbs



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**Recap of Taxes, Overhead and Profit**

	<b>Overhead (10%)</b>	<b>Profit (10%)</b>	<b>Material Sales Tax (5%)</b>	<b>Services Mat'l Tax (5%)</b>	<b>Service Sales Tax (5%)</b>	<b>Manuf. Home Tax (5%)</b>	<b>Storage Tax (5%)</b>
<b>Line Items</b>	2,302.56	2,532.80	249.10	1.51	82.61	0.00	0.00
<b>Additional Charges</b>	50.00	55.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>2,352.56</b>	<b>2,587.80</b>	<b>249.10</b>	<b>1.51</b>	<b>82.61</b>	<b>0.00</b>	<b>0.00</b>

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**Recap by Room**

Estimate: 2021-08-17-1445	22,311.94	97.97%
Labor Minimums Applied	462.81	2.03%
<hr/>	<hr/>	<hr/>
<b>Subtotal of Areas</b>	<b>22,774.75</b>	<b>100.00%</b>
<hr/>	<hr/>	<hr/>
<b>Total</b>	<b>22,774.75</b>	<b>100.00%</b>

**Recap by Category**

<b>O&amp;P Items</b>	<b>Total</b>	<b>%</b>
CONT: CLEAN - GENERAL ITEMS	44.13	0.15%
CLEANING	1,319.67	4.62%
GENERAL DEMOLITION	2,473.28	8.66%
DRYWALL	487.61	1.71%
ELECTRICAL	275.00	0.96%
PERMITS AND FEES	500.00	1.75%
FINISH CARPENTRY / TRIMWORK	657.24	2.30%
FRAMING & ROUGH CARPENTRY	1,497.60	5.25%
LABOR ONLY	2,233.60	7.82%
LANDSCAPING	241.20	0.84%
MASONRY	507.84	1.78%
PAINTING	4,558.56	15.97%
ROOFING	5,204.44	18.23%
SOFFIT, FASCIA, & GUTTER	2,774.58	9.72%
<b>O&amp;P Items Subtotal</b>	<b>22,774.75</b>	<b>79.78%</b>
Permits and Fees	500.00	1.75%
Material Sales Tax	249.10	0.87%
Services Mat'l Tax	1.51	0.01%
Overhead	2,352.56	8.24%
Profit	2,587.80	9.06%
Service Sales Tax	82.61	0.29%
<b>Total</b>	<b>28,548.33</b>	<b>100.00%</b>



1 1-Uprooted Tree

Date Taken: 8/13/2021

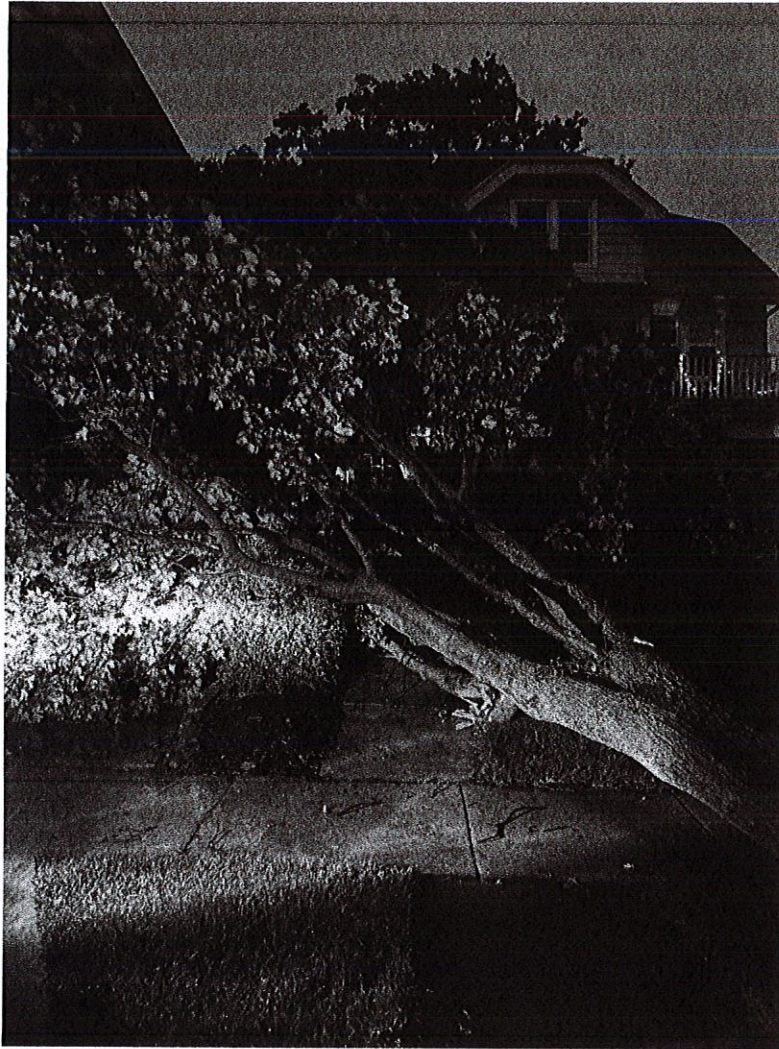




2 2-Uprooted tree

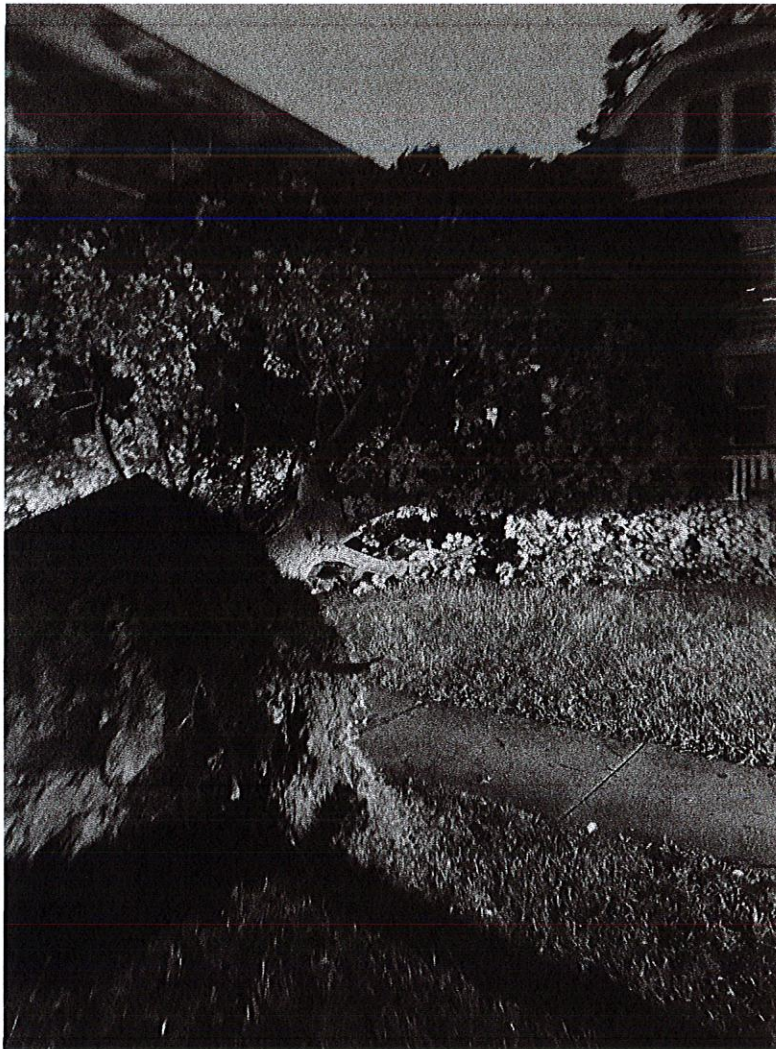
Date Taken: 8/13/2021





3 3-Tree on house

Date Taken: 8/10/2021



4 4-Tree on house

Date Taken: 8/10/2021





11 11-Busted railing upper

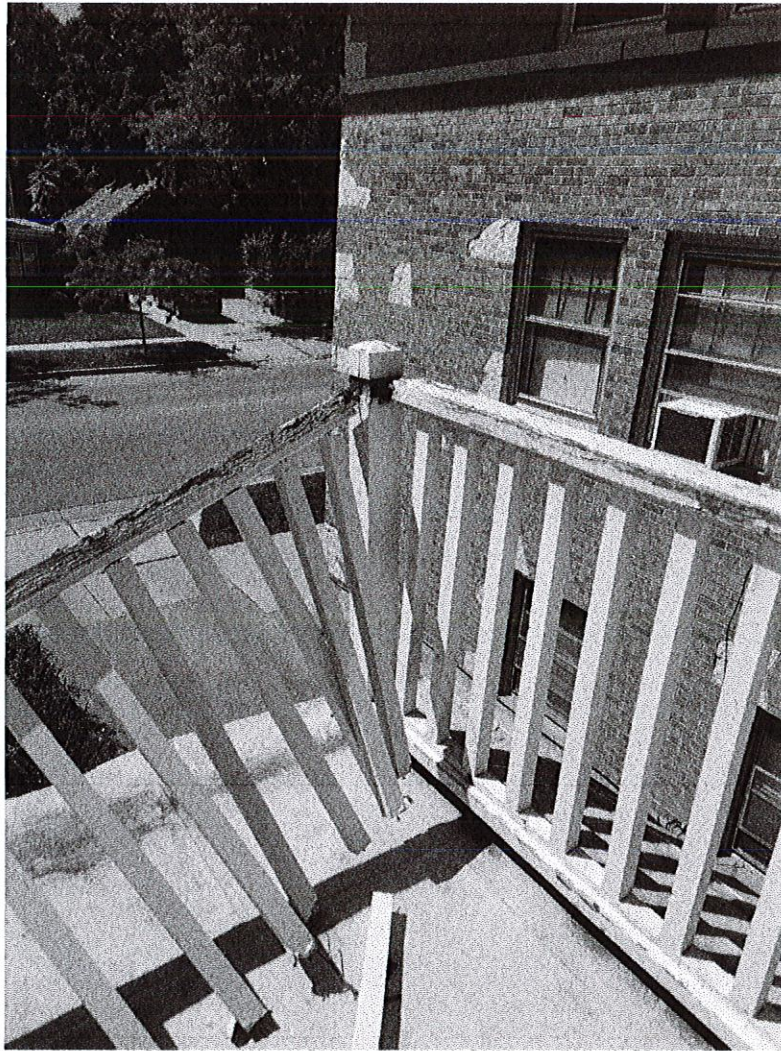
Date Taken: 8/13/2021





12 12-Busted railing upper

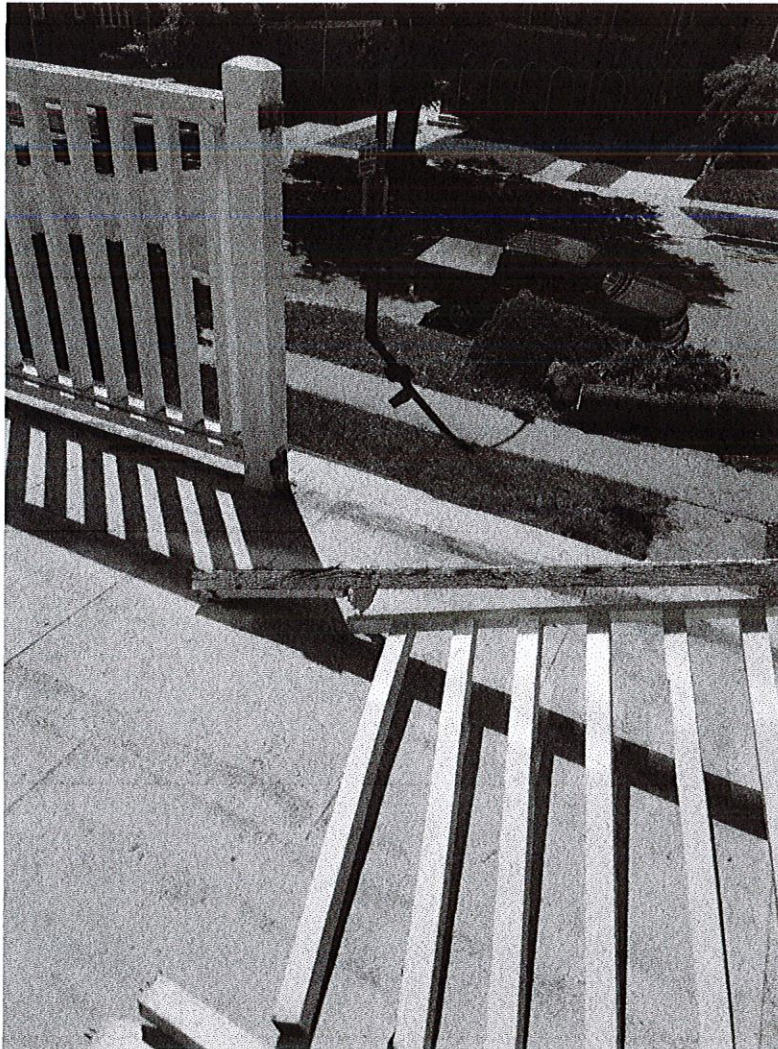
Date Taken: 8/13/2021



13 13-Upper railing

Date Taken: 8/13/2021





14 14-Upper railing

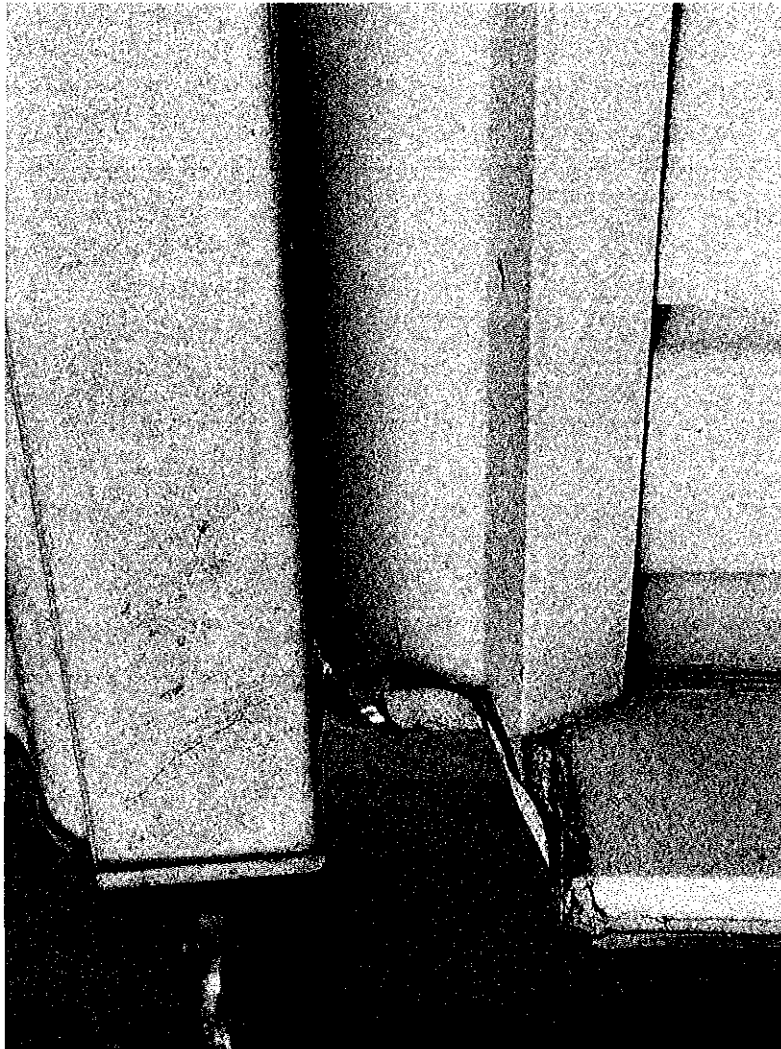
Date Taken: 8/13/2021



15 15-Upper railing

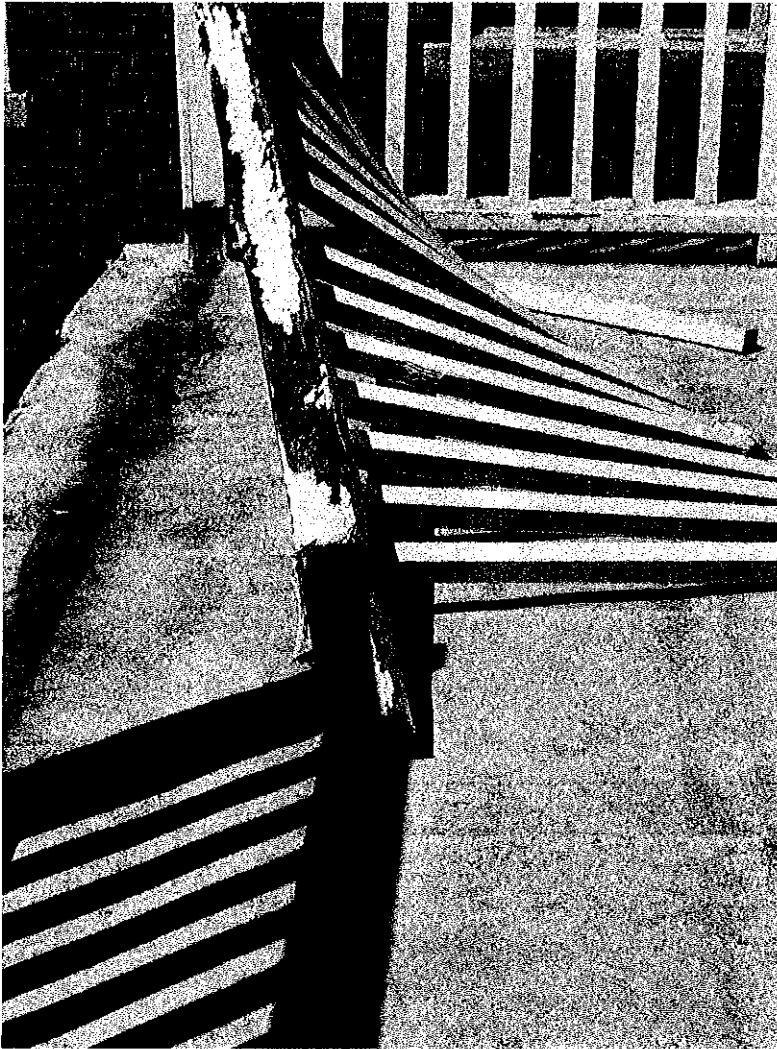
Date Taken: 8/13/2021





16 16-Top porch damage

Date Taken: 8/13/2021



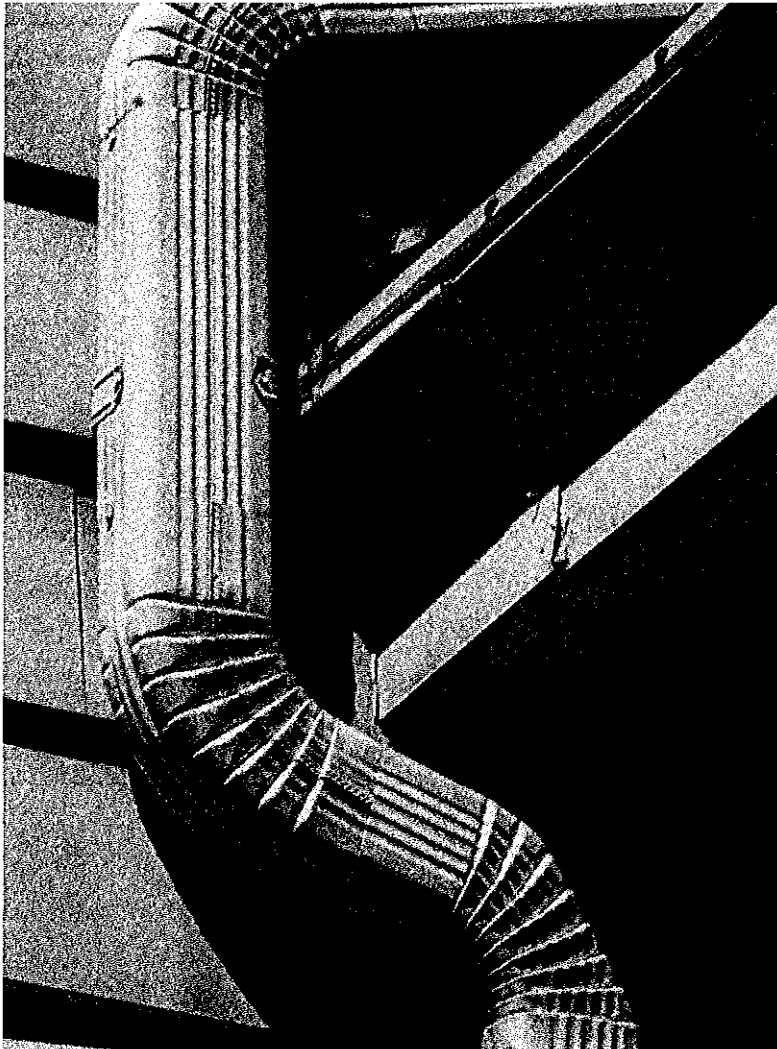
17 17-Damaged railing

Date Taken: 8/13/2021



19 19-Storm samage to fascia

Date Taken: 8/13/2021



20      20-Storm damage rubber roof      Date Taken: 8/13/2021





21 21-End cap damages

Date Taken: 8/13/2021



22      22-Separation of the bent gutter      Date Taken: 8/13/2021





23 23-Fascia damage

Date Taken: 8/13/2021

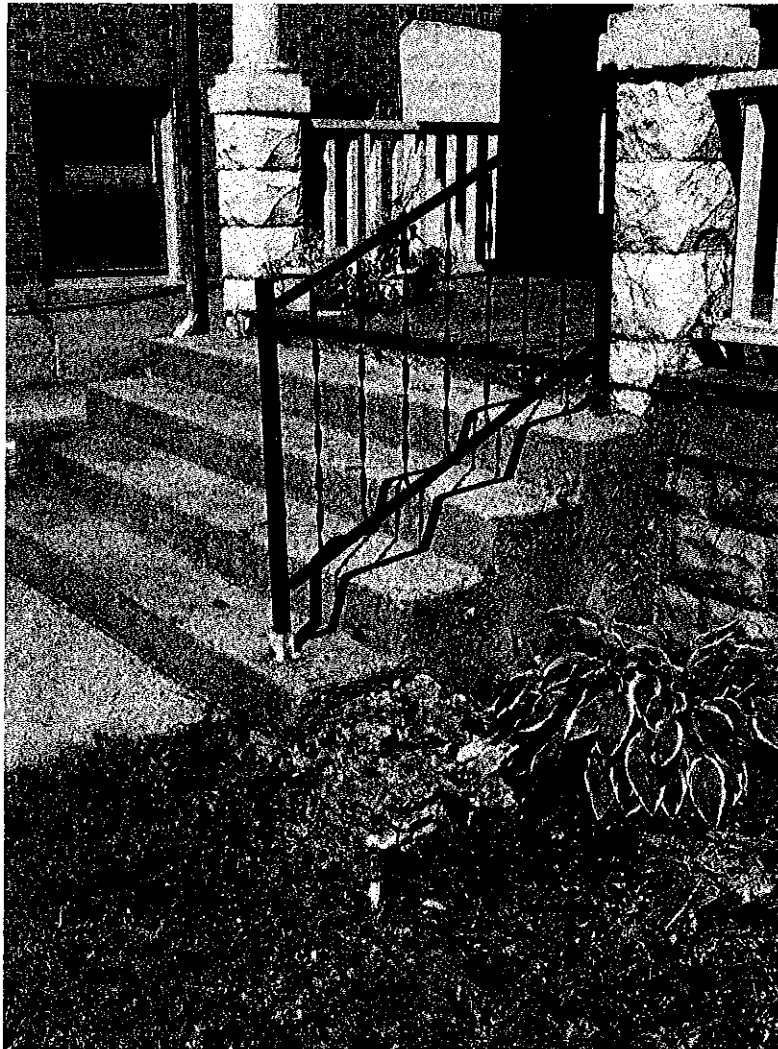


24 24-Fascia damage

Date Taken: 8/13/2021



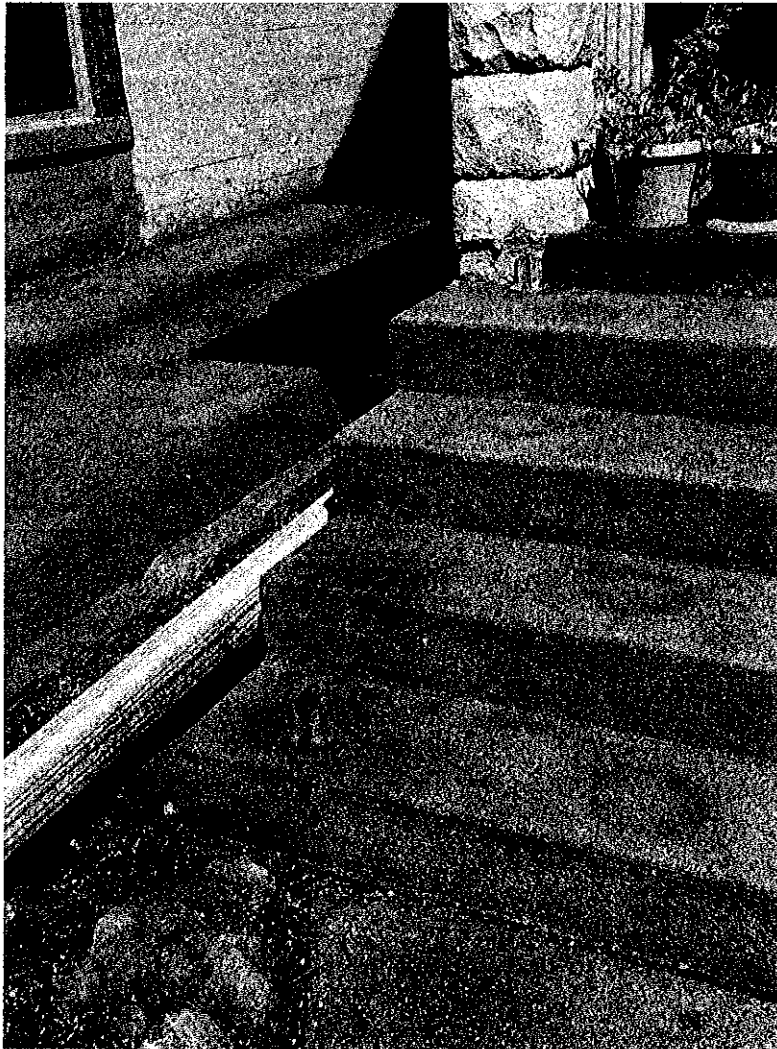
26      26-Rubber roof      Date Taken: 8/13/2021  
Rubber roof damaged causing the leak inside of the home.



27 27-Railing

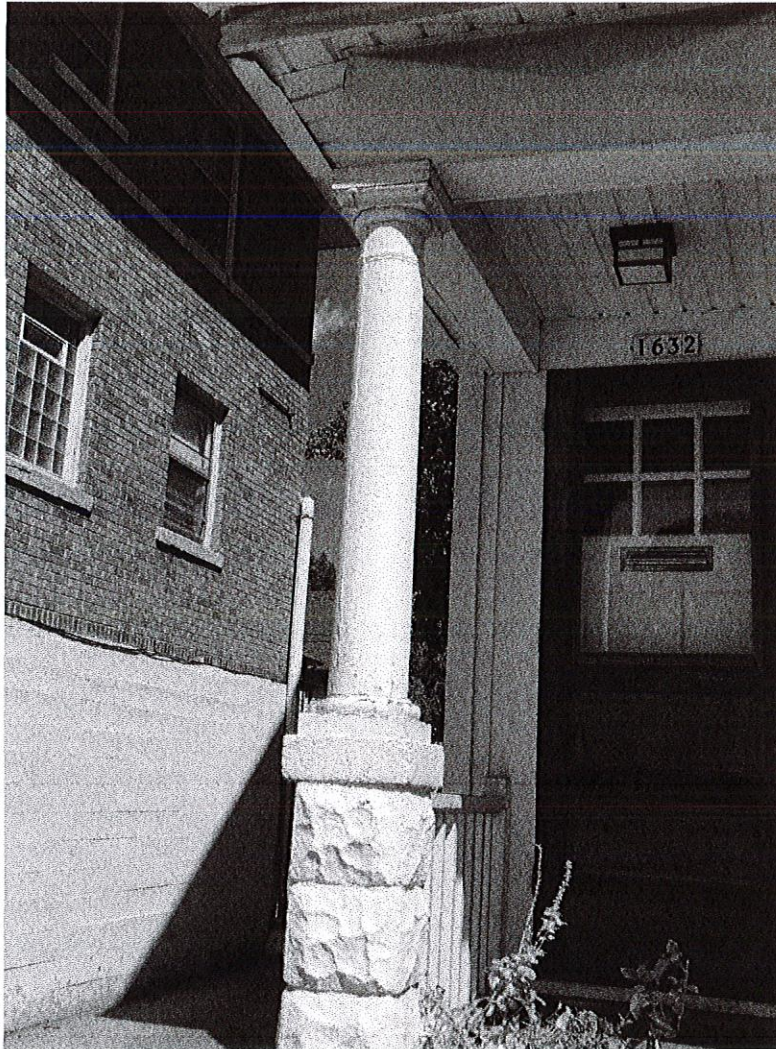
Date Taken: 8/13/2021

The railing you see is weak as a result of the weight of the tree. Needs replacing.



28      28-Missing railing      Date Taken: 8/13/2021  
There was a black metal railing on the stair that the tree took out.



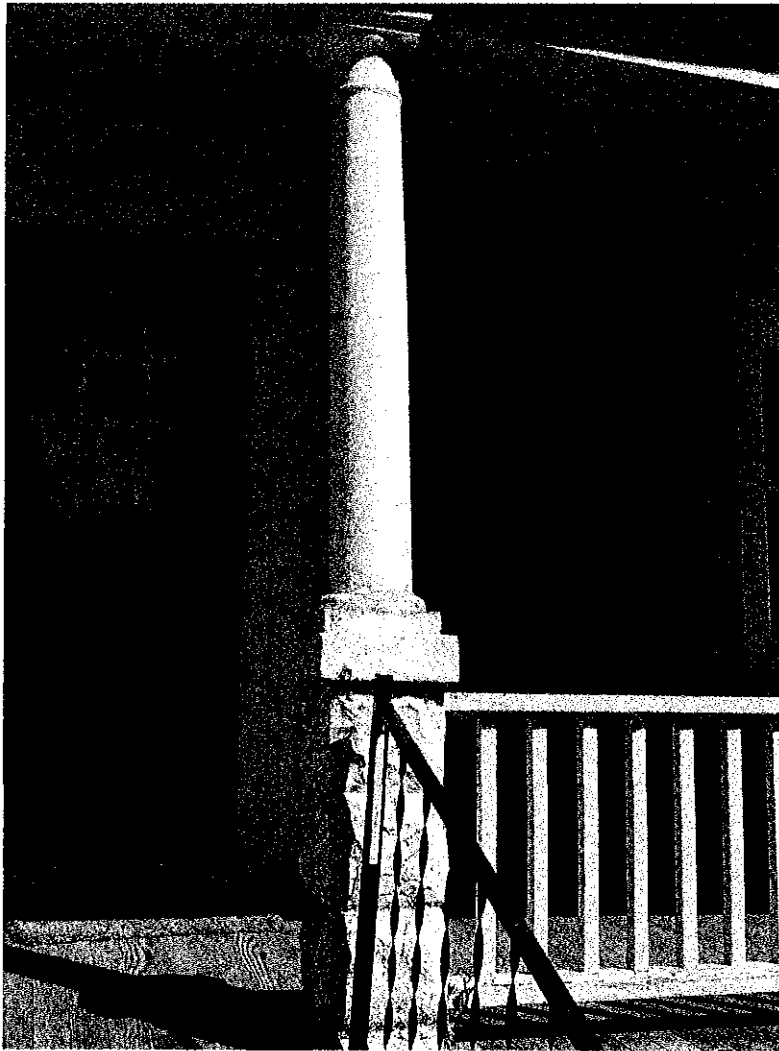


29 29-Column Damage

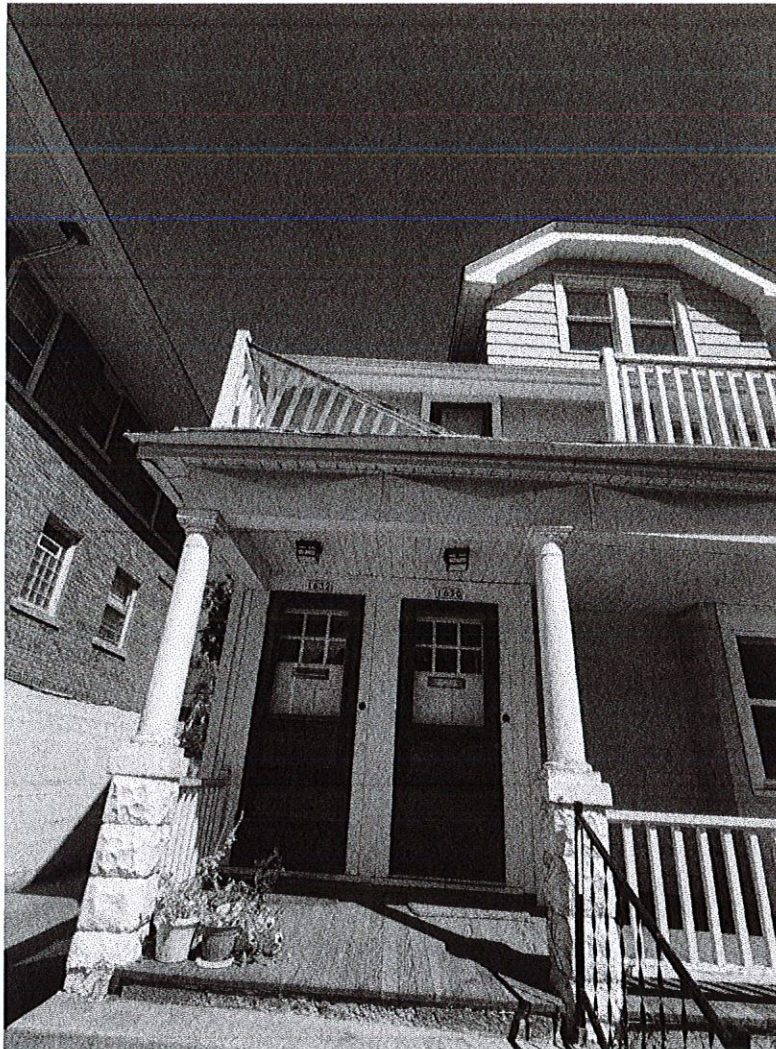
Date Taken: 8/13/2021

The column is damaged as a result of the weight of the tree. This supports the left upper deck porch.





30 30-Column Damage Date Taken: 8/13/2021  
The column is damaged as a result of the weight of the tree. This supports the upper deck porch.

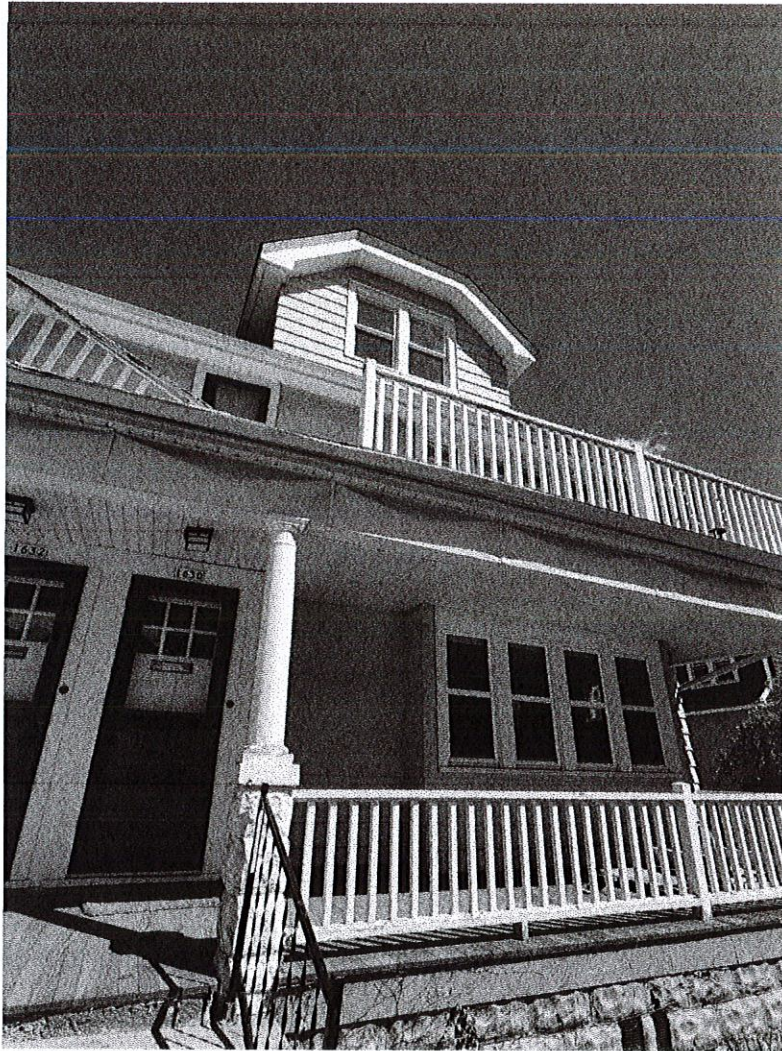


31 31-Separation

Date Taken: 8/13/2021

There is separation between the soffit and the trim around the door. The weight of the tree was weighing down the upper deck porch causing the separation.





32 32-Upper Porch

Date Taken: 8/13/2021

Here you can see the damage showing the weight from the tree has unsecured the upper deck porch. Needs a structure inspection.



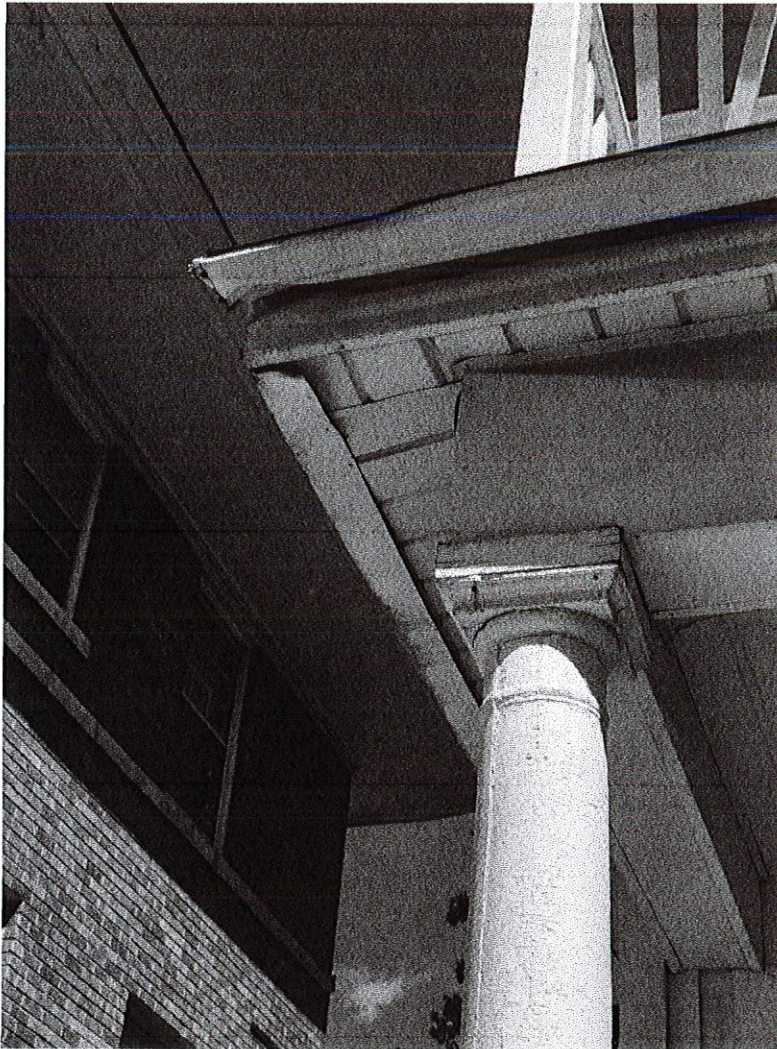
33

33-Fascia

Date Taken: 8/13/2021

Weight of the tree has bowed down the structure causing the damage to the fascia and deck.





34 34-Gutter & Soffit  
Gutter and soffit damage.

Date Taken: 8/13/2021

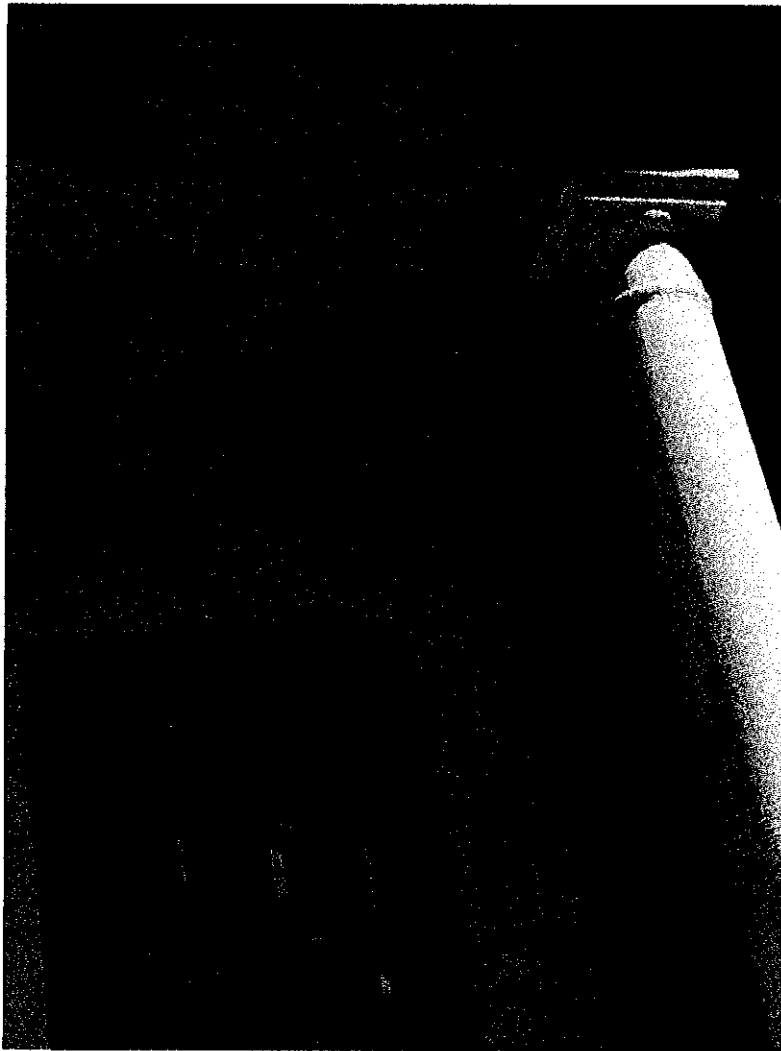


35 35-Gutter & Soffit

Date Taken: 8/13/2021



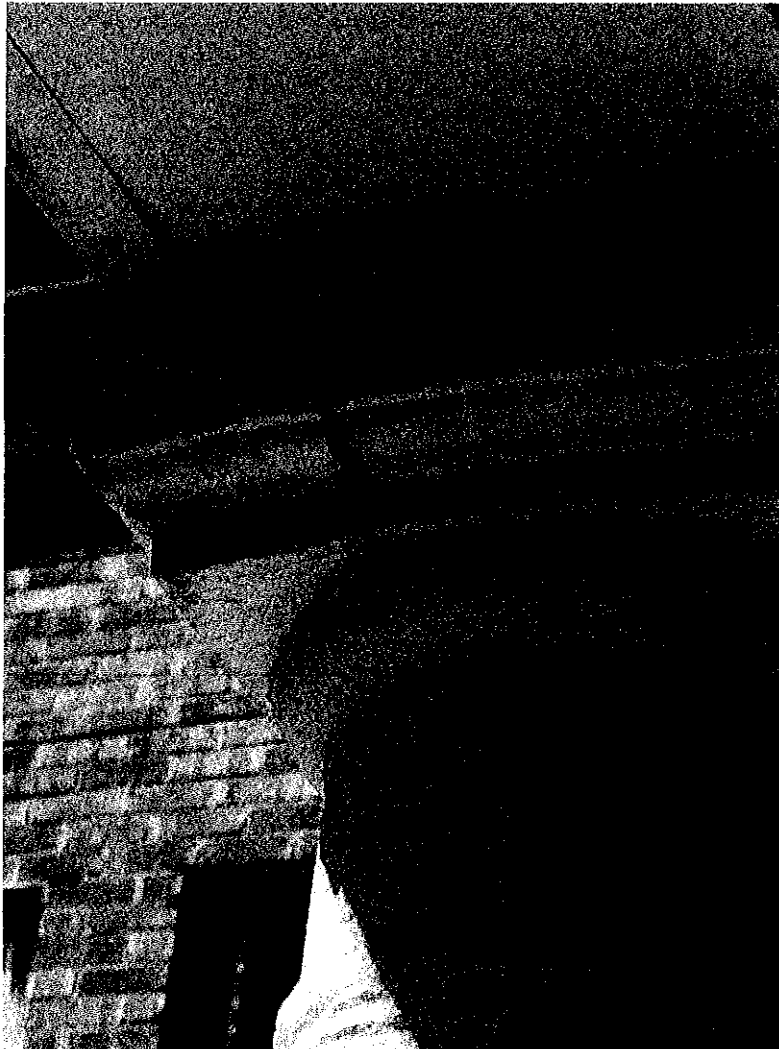
36 36-Damaged caused by weight Date Taken: 8/13/2021



37 37-20210813\_145520

Date Taken: 8/13/2021





38 38-Top Column

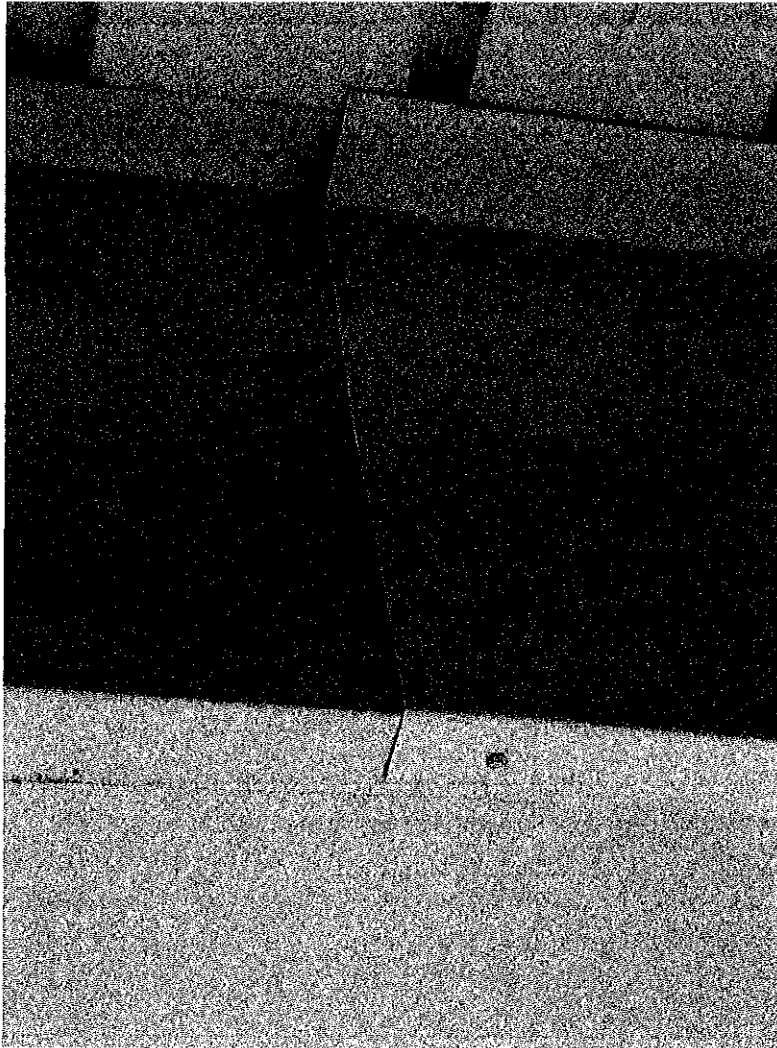
Date Taken: 8/13/2021

The column has cracked from the weight of the tree. This supports the upper deck porch.



39 39-Damage  
Damage above the other column.

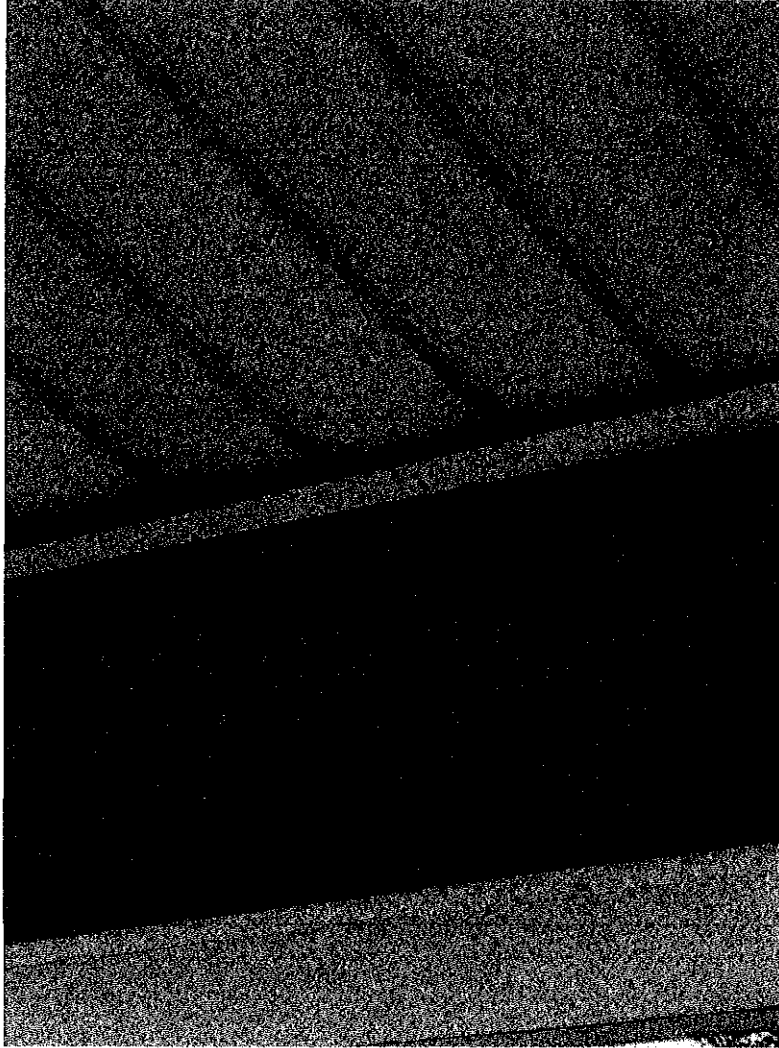
Date Taken: 8/13/2021



40 40-Fascia

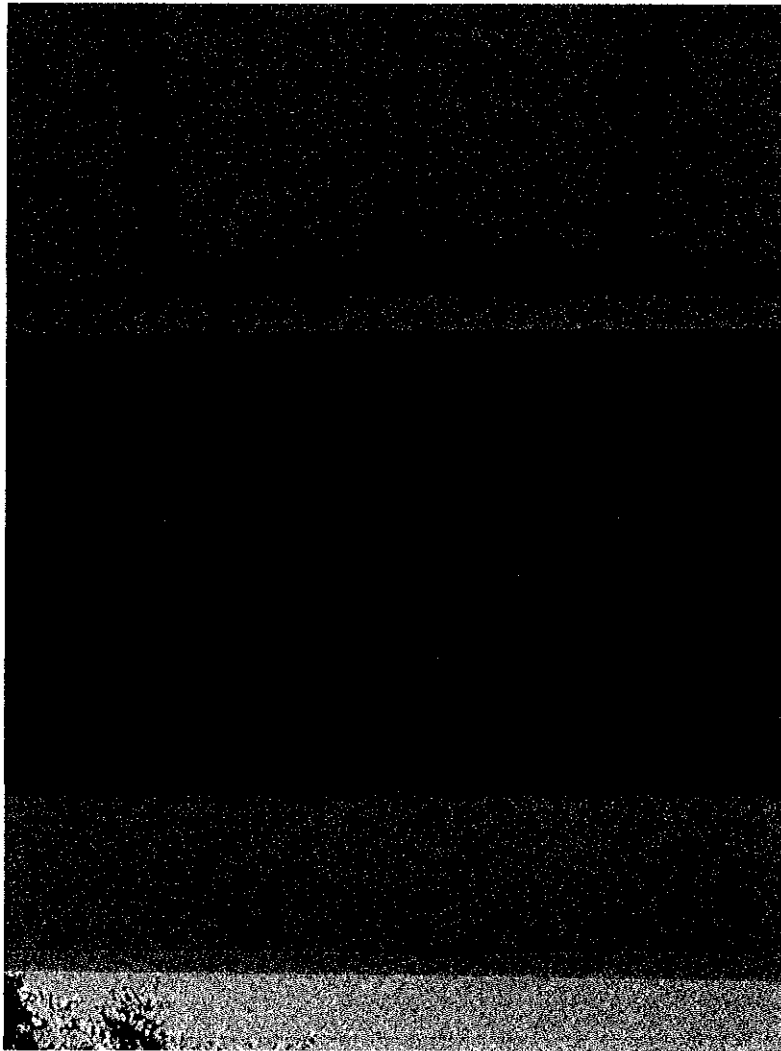
Date Taken: 8/13/2021





41 41-Soffit  
Soffit separation.

Date Taken: 8/13/2021



42 42-Soffit bowed  
Soffit has bowed and separated.

Date Taken: 8/13/2021

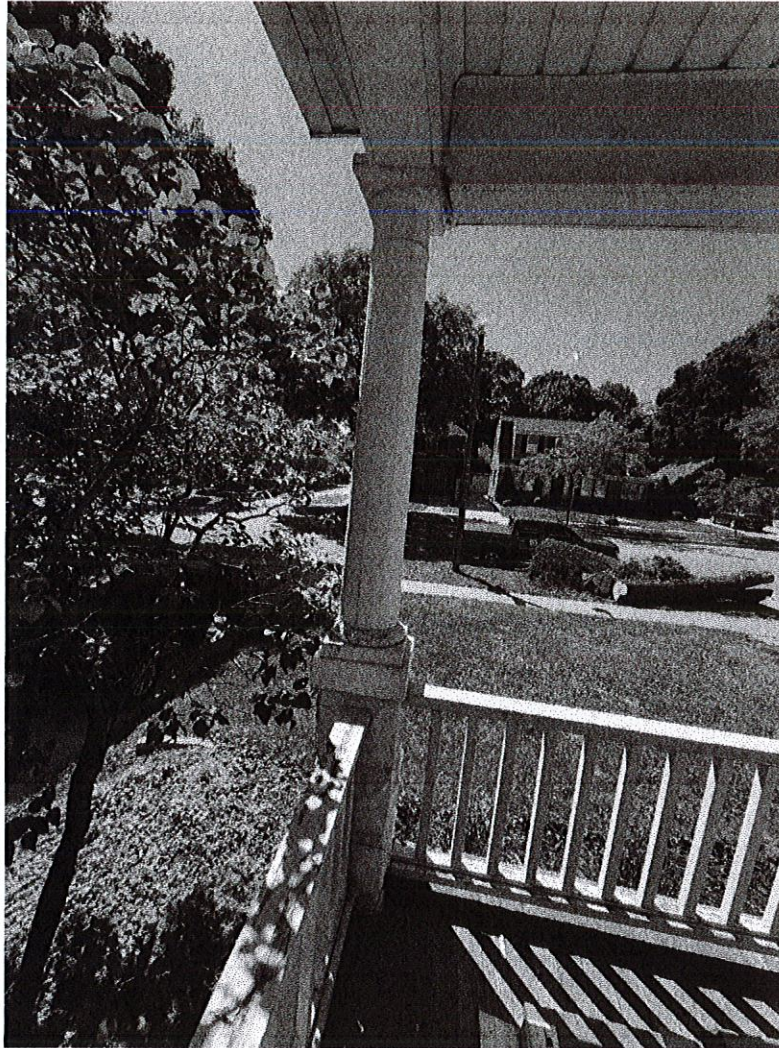


43 43-Fascia buckled

Date Taken: 8/13/2021

Buckled fascia. Not sure about the condition of the wood underneath it from the weight of the tree when it hit.





44 44-Showing Separation Date Taken: 8/13/2021  
Between soffit and fascia separation.



45 45-Upper deck separating Date Taken: 8/13/2021  
Upper deck is separating a bit from the house.



46      46-Left side      Date Taken: 8/13/2021  
Soffit and fascia damaged. Separation is visual here as well.





47

47-Side gutter

Date Taken: 8/13/2021

This gutter was damaged by the tree.



48      49-End of gutter  
Left side damage from the tree.

Date Taken: 8/13/2021



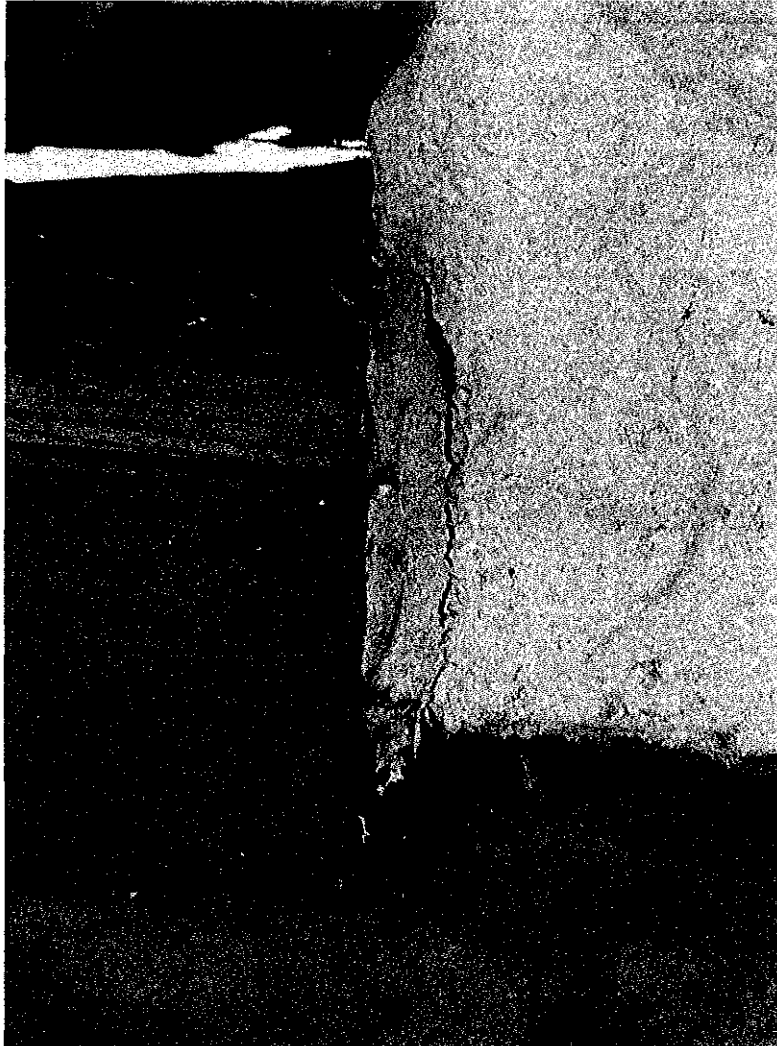
49      50-Left side      Date Taken: 8/13/2021  
Showing the damage from the tree to the fascia and the soffit.



50 51-Left side  
Gutter damaged.

Date Taken: 8/13/2021





51 52-Cracking

Date Taken: 8/13/2021

The column on the right side is sitting above this.

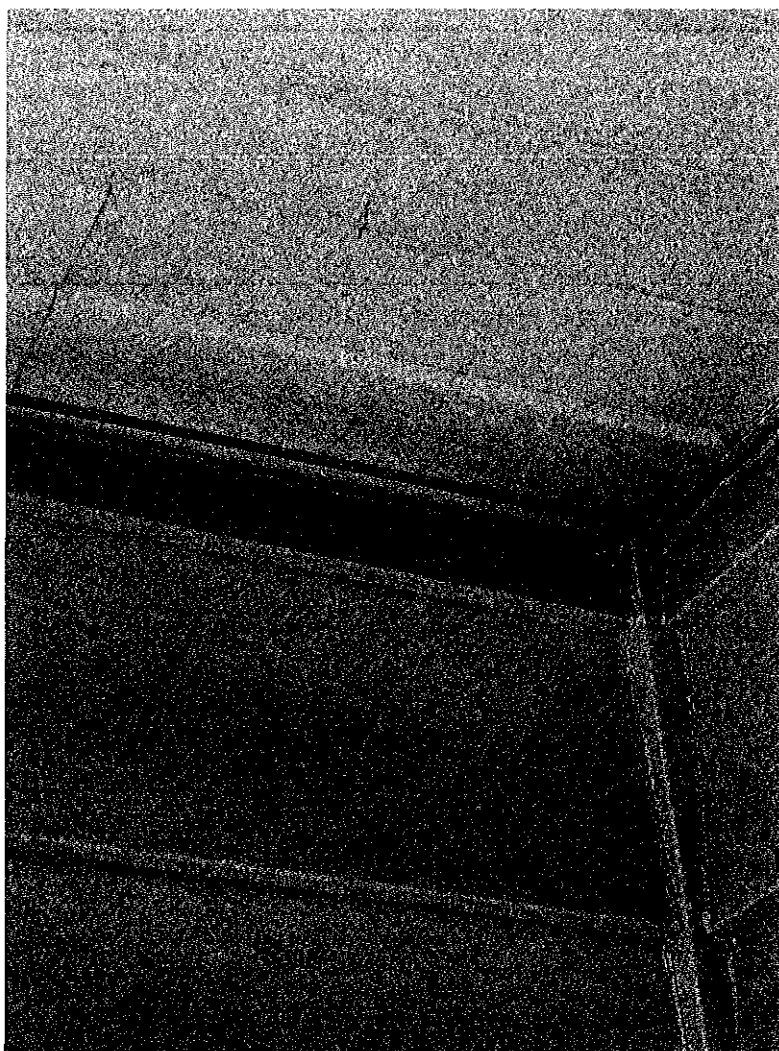


52 53-Showing separation

Date Taken: 8/13/2021



53      54-Showing the separation      Date Taken: 8/13/2021  
This is part of the upper deck porch.



54 55-More separation

Date Taken: 8/13/2021





55 56-Lawn damage

Date Taken: 8/13/2021

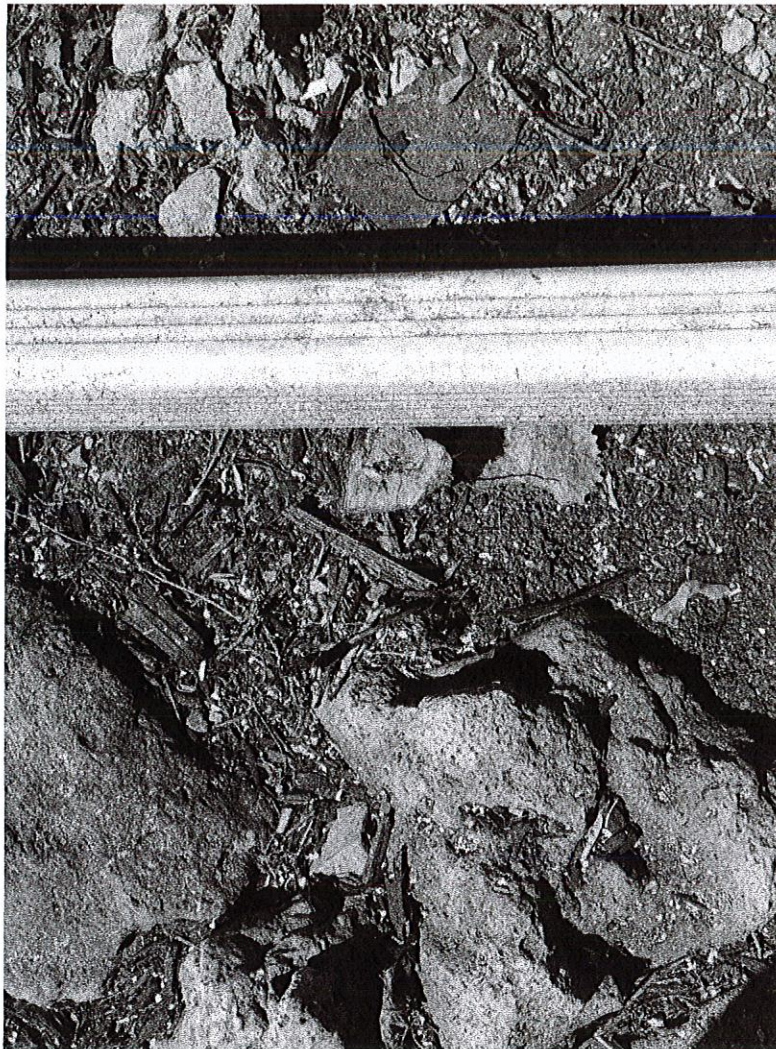


56 57-Damaged shrubs

Date Taken: 8/13/2021



57      58-Missing tree      Date Taken: 8/13/2021  
Home owner had a smaller tree here. The city tree took that out too.



58 59-Another image Date Taken: 8/13/2021  
Another image of where the tree was that the home owner had.





59 60-Damaged shrubs

Date Taken: 8/13/2021



60 61-Damaged shrubs

Date Taken: 8/13/2021



**WeatherPro Exteriors**  
 12200 W. Adler Lane  
 West Allis, WI 53214  
 Phone: 414-543-0929

**Company Representative**  
 Heath Swanson  
 Phone: (414) 712-8397  
 hswanson@weatherproexteriors.com

Vinyl siding, gutters, soffit/fascia, Flat Roof, Railings

**Steve Reupert**  
 1630 North 60th Street  
 Milwaukee, WI 53208 (630) 703-8443

Job: Steve Reupert

### Siding - Vinyl Section

Furnish and Install Mastic Carvedwood Premium Vinyl Siding (.44).

#### SIDING DESCRIPTION:

- Exclusive Hang-Tough Technology boosts durability so panels are more resistant to cracking, impact and thermal distortion
- Rollover, Reinforced Nail Hem for easier installation and secure fastening
- Non-toxic pest resistant mineral additives.
- Patented T-2 LOK Panel Locking System delivers a positive locking action with a wider locking mechanism for more contact area
- 5/8" Panel Projection to replicate the appearance of real wood siding
- Durable and extra thick to resist dents from everyday life
- Duranyl 5000 Protection System proprietary technology adds extra UV protection to our deepest, most vivid colors, and protection colors against hard elements and maximizes long-term weatherability.
- Sustainable and recyclable for a better, eco-friendly choice.

PROFILE/REVEAL HEIGHT: 5"

SIDING COLOR: White or light color

CORNER SIZE: Standard

CORNER COLOR: Same as siding

TRIM COLOR: White

Comes with J-Channel trim, accessories and premium 4" corner posts (4").

#### PROJECT INCLUDES:

- Removal of (1) existing layer of siding down sheathing.
- Sheathing will be inspected for rotten or bad wood.
- Re-nail any loose wood/sheathing. If bad or rotten wood is discovered, it will be replaced at \$90 per sheet of OSB.
- Tyvek brand moisture barrier underlayment furnished and installed
- New flashing over window and door openings as necessary
- All J-channel, light blocks, outlet blocks, and accessories per product system
- All window and door openings shall be flashed per manufacturers instructions and industries best practices when applicable.\*\*

#### NOTE:

Project may involve the removal of exterior lighting fixtures and/or other similar fixtures. WeatherPro Exteriors recommends installation of new fixtures by a certified professional to further enhance the beauty of your homes exterior.

#### PROJECT NOTES:

The balcony railings will be supplied by customer, railing install price is included with siding cost. Front porch railings will be replaced and installed with metal equivalent.

LEAD SAFE PROCEDURE: Yes

#### SIDING WARRANTY:

- Mastic's Industry LEADING V.I.P. Limited Lifetime Warranty
- 200 MPH Wind Resistance Warranty
- WeatherPro Exteriors Lifetime Workmanship Warranty

WEATHERPRO EXTERIORS PROJECT GUIDELINES:

- Remove and clean up of all job related debris and will be disposed of properly.
- Includes all labor, materials, taxes and permits.
- WeatherPro Exteriors is licensed and insured.
- WeatherPro Exteriors follows and maintains all OSHA guidelines and regulations during the production of the project.

Price

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**\$45,495.00**

### **Soffit/Fascia Section**

Furnish and Install NEW Aluminum Soffit and Fascia (cladding over existing wood) in customers choice of color.

LOCATION: House  
 FACIA COLOR: White  
 SOFFIT COLOR: White

PROJECT DETAILS:  
 - Removal and disposal of old soffit/fascia material as needed  
 - Inspection of wood

PROJECT NOTES:  
 WOOD REPAIR: Yes  
 STANDARD SOFFIT: Yes  
 CONTINUOUS HIDDEN VENT SOFFIT: No  
 CUT IN SOFFIT FOR MAXIMUM AIR INTAKE: Yes if Necessary

WARRANTY:  
 - 20 Year Coil Warranty  
 - Limited Lifetime Workmanship Warranty by WeatherPro Exteriors  
 \*Includes: Taxes, Clean-Up and Disposal

Price

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**\$7,354.00**

### **Gutters Section**

LOCATION: House & Garage

COLOR: White  
 GUTTER SIZE: 5"  
 DOWNSPOUT SIZE: 3"x4"  
 GAUGE: 032

PROJECT DETAILS:  
 - Remove and dispose of current gutter system  
 - Furnish and Install new seamless gutters system with hand mitered corners with thick aluminum to handle wind, rain and snow  
 - Hidden hanger system  
 - New apron or flashing as needed  
 - Pitch for correct drainage / Direct drainage from house

PROJECT NOTES:

WARRANTY:  
 - 20 Year Gutter Coil Warranty  
 - WeatherPro Exteriors Lifetime Workmanship Warranty

Price

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**\$6,604.00**

### **Roofing - flat Section**

Furnish and Install Mule-Hide 60 MIL EPDM Rubber Roof.

- Remove up to (1) existing layers of "low slope" roof system down to the structural wood decking
- Inspect and re-nail any loose wood. If bad or rotten wood is discovered, up to (2) sheets of OSB will be replaced (Additional charge for repair/replacement)



- Includes 2 Squares of Decking to to holes in current flat roof
- Install fiberboard membrane over decking
- Install NEW pipe boots/flashing
- Install NEW chimney flashing
- Install NEW 60 MIL EPDM Roof and fold over edges into gutter system and secure with termination bars and seal
- Seal seams per manufacture specs and code
- Inspection by Mule-Hide Manufacturer Rep for certification of warranty

**CLEANUP:**

- 3x magnet sweep throughout the yard.
- Remove and clean up of all job related debris and will be disposed of properly.

**WARRANTY:**

- Mule-Hide 20 Year Premium Limited Lifetime Warranty
- \*Covers: Labor and Material
- WeatherPro Exterior's Lifetime Workmanship Warranty

- Includes all labor, materials, taxes and permits.
- WeatherPro Exteriors is bonded, licensed and insured.
- We follow and maintain all OSHA guidelines and regulations during the production of the project.

Price

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**\$4,069.00**

<b>Sub Total</b>	<b>\$63,522.00</b>
Discount: Cash/Check Discount 15% Off	(\$9,528.30)
Discount: Google Review	(\$5,716.98)
<b>TOTAL</b>	<b>\$48,276.72</b>



# CONTRACT

2129 S. 55<sup>th</sup> St., West Allis, WI 53219  
 www.CallCreativeConstruction.com  
 414-397-4072

DC- 110900004 DCQ – 120900026  
 EDI # WI-20

August 18, 2021

Steve Reupert  
 1630 N. 60<sup>th</sup> St.  
 Milwaukee, WI 53208  
 630-703-8443

Email: sreupert@gmail.com

For Work at: 1630 N. 60<sup>th</sup> St., Milwaukee, WI 53208

To repair the railing, flashing, other areas damaged by the storm, and a few other spots around the house as agreed between Bingo Emmons of Creative Construction of WI. Inc. and Steve Reupert, owner. This includes repairing the dining room ceiling affected by the leak. Repaired areas to be primed and painted to match existing as close as possible.

Since the building was built before 1978; all lead safe precautions will have to be taken when removing the damaged materials.

Total Amount Due: \$27,700.00

Down payment 1/2	\$13,850.00
Balance due upon completion	\$13,850.00

Contractor

Purchaser

Creative Construction of Wisconsin, Inc. agrees to supply all labor, equipment, and materials to complete the above work. When you contract with Creative Construction of Wisconsin Inc. you employ the latest in equipment, experienced personnel, and complete insurance coverage.

Any additional work will be billed Time and Material to be paid weekly as billed \$127.50 per hour plus materials.

*Serving South Eastern Wisconsin for the past 5 Generations*

