## McCORMICK LAW OFFICE

PERSONAL INJURY AND WORKERS COMPENSATION

DANIEL R. McCormick Ellison F. Hitt Megan E. Schulz

ATTORNEYS AT LAW

March 24, 2017

Attorney Grant F. Langley City Attorney of Milwaukee City Hall 200 E. Wells St. Room 800 Milwaukee, WI 53202

Re:

CI File No. 1047-2015-2920

Communication on behalf of TYLER PERALES

Dear Mr. Langley:

I am in receipt of your March 10, 2017 correspondence concerning the above-captioned matter and denying the claim made on behalf of my client, Tyler Perales.

At this time we are formally requesting an appeal of the decision to deny Mr. Perales' claim. As stated in your correspondence, the Milwaukee Police Department had to secure the open pedestal as well as having the Department of Public Works repair the pedestal. The City of Milwaukee was negligent in the following manners:

- Allowing a dangerous condition on their property;
- Failing to properly maintain, operate, repair or construct a dangerous condition on their property after actual or constructive notice;
- Failing to give warning to Mr. Perales of the dangerous condition; and
- Failing to properly inspect and maintain the area in question to discover the dangerous condition.

I am enclosing a copy of your March 10, 2017 correspondence and a copy of the envelope.

Should you have any additional questions concerning this matter, please do not hesitate to contact our office at your very earliest convenience.

Thank you.

Very truly yours

ELLISON F. HITT

EFH/

**ENCLOSURES** 

cc:

Tyler Perales (w/Enclosures)

829 North Marshall Street Milwaukee, Wisconsin 53202 McCORMICK LAW OFFICE

Attorney Grant F. Langley
City Attorney of Milwaukee
City Hall
200 E. Wells St.
Room 800 Milwaukee, WI 53202

\$0.46 0 US POSTAGE FIRST-CLASS 62S0008288137 FROM 53202

RECEIVED Tyler Perales

NOV 23 2015

NOV 24 2016

NOV 23 2015

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NOV 25 2016

NOV 2 Bad Juster). On Sunday, August 2 2015, at approximently 1000 10 pm. I was dispatched to 1733 S. 2st S.

For a Wires Down complaint.

Tyles S. Perales (MW 08-16-1991) States was walking vertubound in the 1700 block of S. Zst when his leg made contact with an exposed wire. He felt to the ground after the shock, due to the shock. I observed dizzeness at first. Then came my beaut beat raising up. The left to side of my body was words words. With boin warks of my lower right ankle. Which led me to St. Lukes hospital where I was brought to the E.R. and after that to the medical appoints. Futher medical appointments from now and on with me loosy many days of work and the heasel of we figuring this out and whent Tarbook valuat I have held to do to time this all out. Most of attachment are included with this letter. As af right now ing medical bills are coming out to 4,191.00 het including poin soffery and lost work wages.

4,191.00

Report Settings

Account:

PERALES, TYLER S [1037555]

Submission Information

User:

[230104]

Time:

Fri Nov 20, 2015 11:22 AM

Transaction Information		and the state of t	STREET PERSONNELLE STREET, STR
	Service Date From	Service Date To	Total Amoun
⊟ Charges	08/01/2015	10/30/2015	1,235.0
Tx# Procedure	Service Provider	Date	Amour
128 36415-VENIPUNCTURE	Katrice M Brooks, MD [1	10/12/2015	35.0
129 86592-RPR	Katrice M Brooks, MD [1	10/12/2015	42.0
130 87340-HEPATITIS B ANTIGEN	Katrice M Brooks, MD [1	10/12/2015	71.0
131 87389-HIV-1 AG W/HIV-1 & HIV-2 AB	Katrice M Brooks, MD [1	10/12/2015	160.0
132 87491-CHLAMYDIA TRACHOMATIS, AMPLIFIED P	Katrice M Brooks, MD [1	10/12/2015	160.0
133 87591-N.GONORRHOEAE, DNA, AMP PROB	Katrice M Brooks, MD [1	10/12/2015	178.0
134 93000-ELECTROCARDIOGRAM COMPLETE	Nazih Botros, MD [20902]	10/12/2015	202.0
135 36415-VENIPUNCTURE	Katrice M Brooks, MD [1	10/20/2015	35.0
136 82565-CREATININE SERUM	Katrice M Brooks, MD [1	10/20/2015	38.0
137 99214-OFFICE/OUTPT VISIT EST LEVEL IV	Katrice M Brooks, MD [1	10/12/2015	314.0
Payments	Not inc	cluded in this report	
Adjustments	Not inc	cluded in this report	

RECEIVED

NOV 23 2015

OFFICE OF CITY ATTORNEY

## **Transaction Summary**

## Account: PERALES,TYLER S [135443282] Printed at 11/20/2015 11:24:49 AM for MATTHEWS, PATRICIA M

Charges Grouped By	Revenue Code		
Select All Groupers			
Rev Code	Description	Qty	Total
0250	PHARMACY - GENERAL CLASSIFICATION	2	291.96
0300	LABORATORY - GENERAL CLASSIFICATION	1	26.00
0301	LABORATORY - CHEMISTRY	7	619.00
0305	LABORATORY - HEMATOLOGY	1	39.00
0450	EMERGENCY ROOM - GENERAL CLASSIFICATION	2	1,445.00
0730	EKG/ECG (ELECTROCARDIOGRAM) - GENERAL CLASSIFICATION	2	536.00
Payments and Refund	S		
Adjustments	•		Annese ( - 4 ) Service ( - 504 ) For ( - 504 )
None			

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NOV 23 2015

OFFICE OF CITY ATTORNEY

## Incident Report MILWAUKEE POLICE DEPT

152130141

Supplement No ORIG

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his report is written by P.O. Radivoje PUPOVAC Assigned to District #2, Late Shift Squad # 2341.

On Sunday, August 1, 2015, at approximately 10:10pm. I was dispatched to 1733 S. 1st S. for a Wires Down Complaint.

Upon Arrival I spoke to the victim, Tyler S. PERALES (M/W 08-16-1991) who stated that he was walking northbound in the 1700 block of S. 1st St. when his leg made contact with an exposed wire. PERALES stated that he felt an electrical shock and felt to the ground, due to the shock.

PERALES stated that he has a burn mark on his right ankle/calf area where his leg made contact with the wire. PERALES stated that he was feeling nauseous and had numbness in his right hand.

I observed redness and a burn mark on PERALES'S lower calf area. I also observed an exposed wire come out of the ground, right next to the light pole #1731. The wire was black in color and approximately 20 inches long. The wire was slanted to the west, towards the walkway.

Milwaukee Fire Department, Engine#1, red shift, Captain SCHUTTE, Chris responded and treated PERALES at the scene. PERALES stated that he does not wish to be conveyed to the hospital by ambulance and would rather have his friends take him to the hospital.

While at the scene I spoke to PERALES'S friend, Magdalen A. BERNAL (F/W 12-08-1992) who stated that she was walking right behind PERALES when he got shocked. BERNAL stated that she observer PERALES fall to the ground and that she initially believed that PERALES tripped and fell. BERNAL stated that PERALES told her that he got shocked and to stay away from the wire.

PERALES was treated at Aurora St. Luke's Emergency Department for his injuries. PERALES was admitted at 11:17pm and treated by Dr. AVERILL, ER Room #9.

Printed At	
09/09/2015 13:37	Page 2 of 3
	100 miles 100 mi

# Incident Report MILWAUKEE POLICE DEPT

2333 N. 49TH ST

Milwaukee,WI 53210

152130141

Supplement No · ORIG

RECEIVED

Reported Date
08/01/2015
Nature of Call
INJSCKPRSN

NOV 23 2015

Officer OFFICE OF PUPOVAC, RADIVOJE CITY ATTORNEY

(414) 935-7502

Administrative info	rmation											
Agency	Incident I		Supplement No	Reported Date		Re	ported Time	CAD	Call No		E H	
MILWAUKEE POLICE DEI		130141	ORIG	08/01/2			2:06		1330	)49		
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	Officer			100-100		-						
08/01/2015   10:10	024295/PUP											
Assignment SECOND DESCRIPTION TO	Entere		signment				RMS T		san, oveg	Property?		
SECOND DISTRICT - LA Approving Officer			COND DIS		LAT	E	Suc	cessi	ul	None		
019365	Approval Date		Approval									
CRIME VICT RS FM PV-17	08/28/2	2015	10:48	3:47				42				
Yes												
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WIF 1 I BERN	NAL, MAGDALE	EN A		:	3540	978	W	F		12/08/	199	2
Narrative												

Subject was walking when he got electrocuted by an exposed wire.



Thank you for choosing ERMED SC for your health care needs.

Statement Date: Responsible Party: Account Number: Due Date:

9/21/15 TYLER S PERALES 836\*0042781947 **Upon Receipt** 

#### REQUEST FOR PAYMENT

Summary of Account	
Total Charges	\$ 565.00
Insurance Payments	\$ 0.00
Insurance Adjustments	\$ 0.00
Patient Payments	\$ 0.00
Account Adjustments	\$ 0.00
AMOUNT YOU OWE	\$ 565.00

Your prompt payment is appreciated! Please see the following page for transaction details.

#### Important Message:

Your account still has an outstanding balance. Please make payment immediately to avoid further collection activity. Thank you for your prompt attention.

Su cuenta refleja un balance pendiente. Por favor envie su pago para evitar futuras facturas. Apreciamos su pronta atencion.

#### Payment, Insurance, & Billing Information







Pay by credit card online anytime, day or night! www.peryourhealth.com

Pay by credit card via phone: 866-898-7147 Certified, safe and secure credit card processing.



Visit us at www.peryourhealth.com to update your insurance, address, view your account, or send a message to our billing office. ID: 836\*0042781947 Access key: Q3T429



To contact the billing office, please call 866-898-7147 MON-FRI 8:00 AM - 5:00 PM CST Para asistencia en Español llame al numero de arriba.

RECEIVED

NOV 23 2015

OFFICE OF CITY ATTORNEY

-- Please detach and return bottom stub with your check Pay By Mail -- Include account number on check and correspondence

Acco	ount	Patient TYLER S. PERALES			
836*0042	2781947				
Statement Date	Amount Due	Due Date	Amount Paid		
9/21/15	\$ 565.00	Upon Receipt			

For your protection: Do not include the credit card information in the mail.

Make CHECK payable and remit to:

ERMED SC P.O. BOX 808 GRAND RAPIDS, MI 49518-0808 Temp - Return Service Requested

GRAP\*0595\*0042781947\*C836 459745 287099 171825733 TYLER S PERALES 1400 E WARNIMONT AVE MILWAUKEE, WI 53207-3582

ով Մահենաայի իրանների գրիային ին Անահիրի իրանային իրանային իրանային համանակին հիրանային հիրանային հ **ERMED SC** PO BOX 78012 MILWAUKEE, WI 53278-8012



Statement Date:

8/21/15 **TYLER PERALES** 

Pay by credit card online anytime, day or night! www.peryourhealth.com

Responsible Party: Account Number: Due Date:

3720\*2517605 Upon Receipt

Patient: TY	LER PERALES	Site of Service:	ST LUKES ER/CP		Primary:	COMMON G	ROUND HE
Account: 37	20*2517605.1	Refer Prov:	KEVIN J AVERILL MD		Secondar	y: Self Pay	
Service Dt.	Service Description		Qty	Charges	Payments	Adjustments	You Owe
08/02/15	82435 CHLORIDE SERUM		1	15.00			
08/02/15	82550 CREATINE KINASE (CPK) (CK)		1	17.00			
08/02/15	82803 GASES BLOOD, ANY COMBINA	TION	1	58.00			
08/02/15	82947 GLUCOSE, QUANT		1	16.00			
08/02/15	84132 POTASSIUM SERUM		1	13.00			
08/02/15	84295 SODIUM SERUM		1	15.00			
08/02/15	84520 UREA NITROGEN, QUANT		1	13.00	2.3.40.00.00.00.00.00.00.00.00.00.00.00.00.	energy to the first energy of the first of the second of	
08/02/15	85014 BLOOD COUNT, OTHER THAN	HEMATOCRIT	. 14	11.00			
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**Total Amount You Owe** \$ 158.00

### RECEIVED

NOV 23 2015

OFFICE OF CITY ATTORNEY

	e summary represents Pathology se a separate statement for services pro		rovider.
CHANGE OF: Address Primary Insurance		The any the Hoophan	TYLER PERALES
Complete this form or go online to www.peryourhealth	a.com to make changes.	4. 3	3720*2517605
New Patient Address, City, State, Zip			New Phone#
Primary Policy Holder Name	Policy Holder Date of Birth		Relationship to Patient
Policy Identification	Group Identification	Plan Code	Policy Effective Date
Insurance Company Name	Address, City, State, Zip		
Insurance Phone#	If Group insurance, name of group (employ	er/union/association)	
Supplemental Policy Holder Name	Policy Holder Date of Birth		Relationship to Patient
Policy Identification	Group Identification	Plan Code	Policy Effective Date
Insurance Company Name	Address, City, State, Zip		
Insurance Phone#	If Group insurance, name of group (employ	er/union/association)	
Work connected Illness or Injury? Yes No	Auto Accident? Yes No	Date of Onset or Accident	!!
Employer Name	Address, City, State, Zip		



PO Box 091700 Milwaukee, WI 53209-8700

If you have a question on your statement, please call: Toll Free 800-326-2250 Mon - Fri, 8:30 am - 5:00 pm Our email address is: customerservice@aurora.org En Español por favor llamar al 866-629-6033

	If paying by or	redit card, fill ou	ut below	
Check credit card using for payment	Masser Bard	DISCOYER	U VISA	AMERICAN DORRESS
Card Number		1		
Signature			Exp	o. Date
(6)				
Print Name				
Bill Date	Account Number			Amount Paid
06/02/2015	1037555	\$195	5.00	

You can pay your bill online at my.aurorahealthcare.org

#### Addressee

### վուրդիրեկումիուկիրկինիիորդիրկիկու

TYLER S PERALES 1400 E WARNIMONT AVE APT 104 MILWAUKEE WI 53207-3561

Page 1 of 1

Please make checks payable and remit to:

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PO BOX 809418 Chicago IL 60680-9418

000001901653 060215 0001037555 0000019500 1

Document Code: P-HDDHQ-13771-LLVQLP

Please detach and return top portion with payment.

Account Number	Account Name	Bill Date	Due Date
1037555	TYLER S PERALES	06/02/2015	Upon Receipt

DATE	DESCRIPTION	CHARGES	PAYMENTS/ ADJUSTMENTS	INSURANCE PENDING	PATIENT BALANCE
	4/17/2015 - Visit # 132956141 - TYLER S PERALES WClinic Services - Hany G Mikhaeel, MD VENIPUNC FNGR, HEEL, EAR HIV-1 AG W/HIV-1 & HIV-2 AB INSURANCE PAYMENT - COMMON GROUND HEALTH COOPERATIVE EXCHANGE PROFESSIONAL/CLINIC SERVICES BALANCE	\$35.00 \$160.00	\$0.00	\$0.00 \$0.00 \$0.00	\$195.00
				NOV CITY AT	ECEIVED 23 2015 PORNEY

If you are experiencing financial hardship or are looking for help in determining if you qualify for any Aurora Health Care financial assistance programs, please contact 1-800-326-2250. Program eligibility is based on income and family size. You may be asked to complete an application and supply additional documents to determine which program best suits your needs.

Message:

Thank you for Choosing Aurora Health Care.

**Please Pay This Amount** 

\$195.00

D106 - 3756360-000501-1/1-C

If you have a question on your statement, please call toll free: 800-326-2250 Mon - Fri, 8:30 am - 5:00 pm En Español por favor llamar al 866-629-6033 Mon - Fri, 8:30 am - 5:00 pm



Thank you for choosing ERMED SC for your health care needs.

Statement Date: Responsible Party: Account Number: Due Date: 8/19/15 TYLER S PERALES 836\*0042781947 Upon Receipt

#### REQUEST FOR PAYMENT

AMOUNT YOU OWE	\$ 565.00
Account Adjustments	\$ 0.00
Patient Payments	\$ 0.00
Insurance Adjustments	\$ 0.00
Insurance Payments	\$ 0.00
Total Charges	\$ 565.00
Summary of Account	

Your prompt payment is appreciated! Please see the following page for transaction details.

#### Payment, Insurance, & Billing Information





Pay by credit card online anytime, day or night! www.peryourhealth.com

Pay by credit card via phone: 866-898-7147.
Certified, safe and secure credit card processing.



Visit us at www.peryourhealth.com to update your insurance, address, view your account, or send a message to our billing office.

ID: 836\*0042781947 Access key: Q3T429



To contact the billing office, please call 866-898-7147 MON-FRI 8:00 AM - 5:00 PM CST Para asistencia en Español llame al numero de arriba.

#### Important Message:

Thank you for using our services. You are receiving this statement because your insurance carrier denied our claim. Please contact your insurance carrier for any disputes. At this time the balance due is your responsibility.

Gracias por usar nuestros servicios. Usted esta recibiendo este estado de cuenta porque su compañia de seguro medico rehuso de pagar este reclamo. Por favor llame a su compañia de seguro medico si no esta de acuerdo con la determinación tomada. En este momento el balance de esta cuenta sera su responsabilidad.

RECEIVED

NOV 23 2015

OFFICE OF
CITYATTORNEY

Pay By Mail -- Please detach and return bottom stub with your check -- Include account number on check and correspondence

Account		Patient		
836*0042781947		TYLER S. PERALES		
Statement Date	Amount Due	Due Date	Amount Paid	
8/19/15	\$ 565.00	Upon Receipt		

For your protection: Do not include the credit card information in the mail.

Make CHECK payable and remit to:

ERMED SC P.O. BOX 808 GRAND RAPIDS, MI 49518-0808 Temp - Return Service Requested

GRAP\*0595\*0042781947\*C836 459745 271770 162282645 TYLER S PERALES 1400 E WARNIMONT AVE MILWAUKEE, WI 53207-3582





Thank you for choosing Great Lakes Pathologists, SC for your health care needs.

Statement Date: Responsible Party: Account Number: Due Date:

10/22/15 TYLER PERALES 3720\*2517605 **Upon Receipt** 

#### REQUEST FOR PAYMENT

AMOUNT YOU OWE	\$ 158.00
Account Adjustments	\$ 0.00
Patient Payments	\$ 0.00
Insurance Adjustments	\$ 0.00
Insurance Payments	\$ 0.00
Total Charges	\$ 158.00
Summary of Account	

Your prompt payment is appreciated! Please see the following page for transaction details.

#### Payment, Insurance, & Billing Information





O.....

Pay by credit card online anytime, day or night! www.peryourhealth.com

Pay by credit card via phone: 877/270-5630 Certified, safe and secure credit card processing.



Visit us at www.peryourhealth.com to update your insurance, address, view your account, or send a message to our billing office. ID: 3720\*2517605 Access key: 4JTMMU



GREAT LAKES

To contact the billing office, please call 877/270-5630 8:30AM - 6:00PM EST Mon-Fri Para asistencia en Español llame al numero de arriba.

Great Lakes Pathologists, SC

8085 Rivers Ave #100

PATHOLOGISTS, S.C. N Charleston, SC 29406

#### Important Message:

This bill is for the professional services of Great Lakes Pathologists, SC who provide pathology services for Aurora Health Care facilities.

08-18-15 COMMON GROUND HEALTH AURORA CLAIM DENIED PATIENT CANNOT BE IDENTIFIED

FINAL NOTICE - We have sent invoices, however your bill remains unpaid. If we do not receive payment or you do not contact us within 30 days of this notice, we may place your account with an outside collection agency.

Pay By Mail

-- Please detach and return bottom stub with your check -- Include account number on check and correspondence

Acco	Account Patient		ient
3720*2517605		0*2517605 TYLER PERALES	
Statement Date	Amount Due	Due Date	Amount Paid
10/22/15	\$ 158.00	Upon Receipt	

For your protection: Do not include the credit card information in the mail.

Make CHECK payable and remit to:

001081 WIS\*688\*2517605C3720 457907 302007 180848745 TYLER PERALES 1400 E WARNIMONT AVE MILWAUKEE, WI 53207-3582

Temp - Return Service Requested

միոլեվինկիներիենիություններիկիլիկունիիներիներին Great Lakes Pathologists, SC PO Box 78420 Milwaukee, WI 53278-0420









