

NOTICE OF CLAIM FOR DAMAGES UNDER SECTION 893.80 OF THE
WISCONSIN STATUTES

TO: CITY OF MANITOWOC
ATTN: CITY CLERK
CITY OF MANITOWOC
900 QUAY STREET
MANITOWOC, WI 54220

Todd Coenen, Julie Coenen and Maxwell Coenen hereby provide Notice of Claim to the City of Manitowoc against the Manitowoc City Police Department. Todd, Julie and Maxwell Coenen have been harassed and selectively prosecuted by members of the Manitowoc City Police Department notably as follows:

1. Citation 3T90FKD6PB – August 14, 2017, Trespass to Land-Posted or /Notified
2. Citation 3T80FGX4JM--December 10, 2017, Trespass to Land-Posted or /Notified
3. Citation 3T80JB3P4X--August 8, 2020, Theft \$0.00-\$9.99 Juvenile

The video regarding the first citation showing Maxwell Coenen allegedly trespassing on the neighbor's yard shows that he took two steps on to the yard to pick up a tiny piece of paper and was on the yard for no more than two seconds. It is noted that Maxwell Coenen at the time was 13 years old, and has issues on the autism scale which introduces challenges into his ability to comply with rules. It is further noted that there was absolutely no damage done to the neighbor's property. Said "trespass" was trivial, yet resulted in a citation.

As to the second citation regarding the driving on property, the video clearly shows that Mr. Coenen probably did not drive on the neighbor's property; but, if he did so, it was due to a covering of snow, and at most may show that he ended up driving an inch or 2 onto the property while legitimately entering his own driveway. Any trespass onto the neighbor's property was absolutely impossible to determine (and to avoid) given the snow cover at the time. Said trespass was obviously not intentional, and again was trivial, yet resulted in a citation.

RECEIVED
NOV 16 2020
CITY CLERKS OFFICE

Jamie A. Pearson
Confidentially Yours, LLC
Date: *11/16/2020* Time: *1:25 pm*
Served Upon: *City of Manitowoc*
Address: *900 Quay Street
Manitowoc WI*
 Personal Substitute
 Corporate Posted
By: *Deborah Nuser*
City Clerk

The theft case involves an allegation against Maxwell Coenen that he was a party to stealing a Donald Trump political sign from the neighbor's yard. The police knew that Maxwell did not steal the sign, and there can be absolutely no indication that he fits the definition of a party to the alleged incident. As a party, he would have to either benefit in some way from the theft (which is ridiculous given the nature of a political sign), or was ready and willing to help in the theft (which there is no indication Maxwell did). It should again be noted that Maxwell suffers from issues on the autism scale. Said theft was clearly not done by any member of the Coenen family, and was trivial given that political signs are free and can be replaced with a quick telephone call to a party headquarters.

In addition, it should be noted that the police have been to the Coenen residence on sixteen (16) occasions regarding complaints from the neighbor. The Coenens also received at least five (5) additional telephone calls from the police, four (4) written warnings, and ten (10) verbal warnings. It should further be noted that the neighbor was warned on only one occasion for her harassing calls to the police.

The Coenens have no criminal records, and they are being recorded on a daily basis by the neighbor who might be suffering from mental health issues of her own. The video recordings by the neighbor point into the garage and backyard of the Coenen's home, and in and of itself may be deemed harassment.

Overall, the police departments conduct and actions show a pattern of abuse of power, harassment and one-sidedness that is biased and utterly unprofessional. The police have consistently taken the side of the neighbor with the invasive video camera, and responded with uniformed officers and marked squad cars to the most benign complaints. It is unlikely that the issuing of numerous citations, police visits and warnings are exceeded by any family in the City of Manitowoc for the last 3 and one-half years, especially a law-abiding family with no criminal history. Said conduct by the police department exceeds the boundaries of the law.

The claimants are requesting monetary damages in the total amount of \$ 100,000.00.

Dated this 5th day of November, 2020.

Dated this 5 day of November, 2020.

Todd D. Coenen

Todd Coenen
1115 Nagle Ave.
Manitowoc, WI 54220

Julie A. Coenen

Julie Coenen
1115 Nagle Ave.
Manitowoc, WI 54220