

NOTICE OF CLAIM AND NOTICE OF INJURY PURSUANT TO WIS. STAT. § 893.80

City of Galesville
Attention: City Clerk
16773 S Main St
Galesville, WI 54630

CLAIMANT:

Andy Parrish
W19877 Ardes Lane
Galesville, WI 54630

1. NOTICE OF INJURY / CIRCUMSTANCES OF CLAIM

This claim arises from the City's procedural failure to properly authorize an Intergovernmental Agreement (IGA) with the Trempealeau County Sheriff's Office regarding the installation and operation of Flock Safety Automated License Plate Readers (ALPR) on City infrastructure.

On or about [Date of Installation], the City allowed the installation of surveillance equipment on City property. This action was taken via a letter of authorization from the Mayor rather than through the mandatory legislative process. Specifically, the City failed to adhere to **Wis. Stat. § 66.0301**, which requires that any such "contract" for the receipt or furnishing of services be **authorized by the governing body** (the Common Council).

2. STATEMENT OF CLAIM

The Claimant asserts that the current operation of the Flock camera system within the City of Galesville is legally unauthorized for the following reasons:

- **Violation of § 66.0301:** The IGA was not approved by a formal vote of the Common Council prior to execution.
- **Ultra Vires Act:** The Mayor's unilateral authorization exceeds the scope of executive authority granted under **Wis. Stat. § 62.09(8)** and City Ordinance **Sec. 2-2-3(b)(1)**, as these do not substitute for the Council's role in intergovernmental contracting.
- **Failure to Ratify:** The subsequent 3-2 vote by the Council to "not remove" the camera does not constitute the affirmative legislative act required to enter into or ratify a shared-services contract under Wisconsin law.

3. RELIEF REQUESTED

The Claimant demands the following:

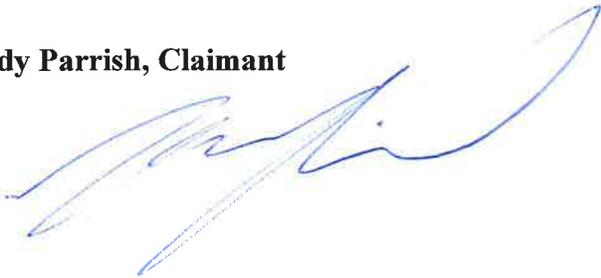
1. **Cessation of Use:** Immediate deactivation of the Flock camera system until such time as a legally valid IGA is drafted, noticed for public hearing, and approved by a majority vote of the Common Council.

2. **Declaratory Relief:** A formal acknowledgement by the City that the initial authorization was procedurally deficient.

Failure to respond to this claim within 120 days will be treated as a disallowance, and the Claimant intends to pursue all available legal remedies in Trempealeau County Circuit Court, including a Declaratory Judgment and Injunctive Relief.

Dated this 9th day of March, 2026.

Andy Parrish, Claimant



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