



City of La Crosse, Wisconsin
400 La Crosse Street, La Crosse, Wisconsin 54601

INVOICE

02-21-24
I request appeal
to Board of Public Works
[Signature]

00037435

IRVIN HOUGOM
105 7TH ST S
LA CROSSE, WI 54601



Invoice Date: 01/25/2024 Due Date: 02/24/2024 Description: NONE

Code Enforcement: Engr - Sidewalk Shoveling (Additional Times) SNOW-024885-2024
105 7TH ST S

	Fee	Quantity	Amount	Paid	Owed
Sidewalk Snow Shoveling Fee - Contractor		1,838.00	\$250.00	\$0.00	\$250.00
Sidewalk Snow Shoveling Fee - Admin (Engr)		0.00	\$75.00	\$0.00	\$75.00
			<u>\$325.00</u>	<u>\$0.00</u>	<u>\$325.00</u>

Detach and include section below with payment:

Make Checks Payable To: City Treasurer, 400 La Crosse St., La Crosse, WI 54601
(Include Invoice/Account Number with Payment)

00037435



Invoice Date: 01/25/2024 Due Date: 02/24/2024 Description: NONE

Amount	Paid	Owed
<u>\$325.00</u>	<u>\$0.00</u>	<u>\$325.00</u>

02/20/2024

Irv Hougom Agency
105 7th St. S
La Crosse, WI 54601

Irvin Hougom's Statement

On the AM the city removed the snow from our boulevard on 7th street the corner of 7th and main. I had an early appointment at Gundersen dental building on 3rd street downtown la crosse. As I walked to Gundersen's front door, I had trouble walking on their sidewalk. It looked as if no one had shoveled at all. The footprints were frozen up and down which was a problem for me as my right knee is waiting for surgery. After my appointment as I walked by to my car I thought, if we left out sidewalk like this we would be in big trouble. I had just paid Matt, our snow removal guy, \$160 for clearing the lot and sidewalks of snow.

I returned to my office about mid AM and the city was plowing the snow off our boulevard to the edge of our entrances on main street. As I watched them move the boulevard snow across our clean sidewalk I wondered, "how come we are first when downtown La Crosse is such a mess." The snow pile they have put at our driveway on main street has now become dangerous you can not see traffic westbound on main street as you pull out. Several days later I was downtown at the breakfast club on main street between 2nd and 3rd and my passenger could not get out of the car because of snow banks along all the boulevards.

Sincerely,

A handwritten signature in black ink, appearing to read "Irvin L. Hougom", with a long horizontal stroke extending to the right.

Irvin L. Hougom

02/19/2024

Joshua Lisney's Statement:

After the last snow fall in January on Monday morning when I went to open up at Farmers Insurance Group, Irv Hougom Agency, I noticed an engine splash guard laying on our sidewalk. I asked Irv about it and he wanted me to move it. I removed the splash guard and placed into onto the snow pile on the boulevard next to the light post. I was thinking about disposing it but in case someone came looking for it, I placed it there.

A handwritten signature in black ink, appearing to read 'Joshua Lisney', with a long, sweeping horizontal stroke extending to the right.

Joshua S. Lisney

Memorandum

To: Irv Hougum
From: Galen W. Pittman
Date: 2/20/2024
Re: Winter Storm and Clearance relating to the Jan. 12, 2024, large winter snowfall in La Crosse, Wisconsin.

STATE OF WISCONSIN)
)SS
LA CROSSE COUNTY)

Galen W. Pittman being first duly sworn on oath deposes and states as follows:

1. He is an attorney licensed to practice in La Crosse, Wisconsin and has practiced law for roughly 55 years as a lawyer. He is currently a member of Pittman & Pittman Law Offices, LLC located at 712 Main Street, La Crosse, Wisconsin adjacent to the Irv Hougum Farmers Insurance Company which is located on the corner of 7th and Main Street.
2. As typical and usual, Attorney Galen Pittman works on Saturdays of the week at the law office located at 712 Main Street, La Crosse, Wisconsin, 54601. On January 13, 2024, with his usual pattern of work, even after the large snowstorm and small flurries of snow, Attorney Pittman drove to his office, but the parking lot was not plowed and so parked in the street adjacent to his building which had been plowed by the city officials. This occurred about 9:00 a.m. in the morning. Sometime before 12:30 p.m. on said Saturday, the person hired to plow the lot of Pittman & Pittman Law Offices, LLC, and Irv Hougum of Farmers Insurance Company had come and plowed both lots. That was noted because at 12:30, was sort of a usual pattern, I leave for lunch on Saturday about that time.
3. When I left at 12:30 on January 13, 2024, Matt our snowplow man had already cleared the lot and most of the sidewalk and was shoveling and clearing the intersection crosswalks leading to the street access on Main Street and 7th Street.
4. Shortly thereafter, after I returned, I saw him shoveling the sidewalks in front of our buildings and clearing the last sidewalks necessary for pedestrian access.
5. I personally witnessed Matt, the snowplow driver clear Irv Hougum's intersection, sidewalk, down main street leading downtown and the intersection on 7th Street leading over toward the Park Bank.
6. From days following, because I attend daily Mass at Cathedral at 12:10 every day, I had walked through that intersection many times prior to the city allegedly clearing the intersection and charging Irv Hougum for clearance and a citation. The sidewalk intersection leading both ways on Main Street and 7th Street were clear and accessible. In fact, they were better cleared than the access on the West side of the Intersection by Citizens Bank or by H&R Block facilities.

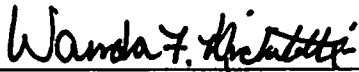
February 20, 2024

7. Some time within the next couple weeks according to the citation that I was shown by Irv Hougum, the City had come by allegedly clearing the intersection, charging a fee and issuing a citation. When that occurred, someone from our office, quoted saying "what are they doing and piling the snow in the boulevard, are they getting ready to remove it from the boulevard to reduce the snow level?"
8. This Affidavit is made in support of the fact that Irv Hougum of Farmers Insurance through his snowplow driver had cleared the access snow in the intersections and work done by the City was bogus and obviously precipitated by a complaint that someone who doesn't like Irv Hougum.



Galen W. Pittman

Subscribed and sworn to before me
this 20~~th~~ day of February, 2024.



Wanda F. Nickelotti, Notary Public
My Commission Expires: 3/3/2026.

