

GL-14-22

CADE LAW GROUP

NATHANIEL CADE, JR.
nate@cade-law.com
www.cade-law.com



June 10, 2022

VIA CERTIFIED MAIL TO ALL:

Samantha Kerkman
County Executive, Kenosha County
1010 56th Street
Kenosha, WI 53140
7021 0950 0001 4446 7972

Joseph Cardamone III, Esq.
Kenosha County Corporation Counsel
912 56th Street
Room LL13
Kenosha, WI 53140
7021 0950 0001 4446 7989

David G. Beth
Sheriff, Kenosha County
1000 55th Street
Kenosha, WI 53140
7021 0950 0001 4446 7996

Regi Waligora
Clerk, Kenosha County
1010 56th Street
Kenosha, WI 53140
7021 0950 0001 4446 8009

Re: Formal demand for mediation and Notice of Claim

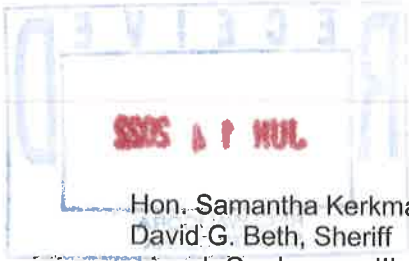
Dear Executive Kerkman, Sheriff Beth, Corporation Counsel Cardamon and Clerk Waligora:

My office, along with Kimberley Motley of Motley Legal Services, has been retained to represent Justin Blake and his recent interaction on April 25, 2021 with the Kenosha Sheriff's Department. Please send all future correspondence to my attention.

As noted, Mr. Blake, who is the uncle of Jacob Blake, along with two other men, held a silent protest outside of the Public Safety Building in Kenosha, protesting Jacob Blake's shooting. Mr. Blake was arrested around 10:00 p.m., purportedly for disorderly conduct, and subsequently for obstruction of a police officer.

Despite the fact that members of the Kenosha Sheriff's Department knew who Justin Blake was, and that he was the uncle of Jacob Blake, Justin Blake was placed in an emergency restraint chair in excess of **six hours** for failing to provide his name (which likely serves as the basis for the obstruction charge). However, emails and other documents obtained through open record requests reveal that members of the Department, as well as the District Attorney's Office, were fully cognizant as to Mr. Blake's identity. At no point did Mr. Blake resist his arrest, attempt to escape or cause injury to himself or others. Thus, there was no basis for him to be placed in the restraint chair, other than as a means of punishment for exercising his First Amendment Right to Protest, and his Fifth Amendment Right to remain silent.

As a result of the illegal arrest and subsequent restraint, Mr. Blake has suffered injury, of which we will seek compensation of at least \$1 million dollars.



Hon. Samantha Kerkman
David G. Beth, Sheriff
Joseph Cardamone III, Esq.
Regi Waligora, Clerk

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This letter will serve both as a formal demand to Kenosha to mediate this blatant disregard of Mr. Blake's civil rights, as well as a Notice of Claim. If a positive response to mediate this matter, likely with a retired federal judge, is not received on or before July 1, 2022, Mr. Blake has authorized us to file a federal civil rights lawsuit against Kenosha County and its agents

We await your prompt response to this demand to mediate.

Very truly yours,

CADE LAW GROUP LLC

Nathaniel Cade, Jr.

MOTLEY LEGAL SERVICES

Kimberley Cy. Motley
2206 Bonnie Butler Way
Charlotte, North Carolina 28270

NC:cn

cc: Mr. Justin Blake