

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

LAURA DRENNAN,

Plaintiff,

v.

Case No: 3:25-cv-1028

CITY OF MAUSTON & ADAM NOE,

Defendants.

COMPLAINT

Plaintiff Laura Drennan, by her attorneys, Strang Bradley, LLC, for her complaint against Defendants, states:

INTRODUCTION

1. This is a civil rights lawsuit brought pursuant to 42 U.S.C. § 1983 to redress the deprivation under color of law of Plaintiff Laura Drennan's constitutional right to be free from unreasonable search and seizure in violation of the Fourth Amendment of the United States Constitution.

2. On September 30, 2025, Mauston Police Department Officer Adam Noe responded to a report of a disturbance at Plaintiff's home. Noe then opened the front door and walked inside Plaintiff's house. After Plaintiff told Noe to leave, he instead searched the home.

JURISDICTION AND VENUE

3. This Court has jurisdiction over federal claims pursuant to 28 U.S.C. § 1331 and the state law claims for indemnification pursuant to 28 U.S.C. § 1367.

4. Venue is proper under 28 U.S.C. § 1391(b). Defendant City of Mauston is a political subdivision of the state of Wisconsin located within this judicial district. Additionally, the events giving rise to the claims asserted herein occurred within this judicial district.

PARTIES

5. Plaintiff Laura Drennan is a resident of the State of Wisconsin.

6. Defendant City of Mauston is a political subdivision of the state of Wisconsin and is or was the employer of Defendant Adam Noe and is required to pay any tort judgment for damages for which its employees are liable for acts within the scope of their employment.

7. Defendant Adam Noe was, at the time of this occurrence, employed as a police officer for the City of Mauston Police Department.

8. At all times Defendant Noe interacted with Plaintiff or her house on September 30, 2025, Noe was on duty, acting under color of state law, ordinance, and regulation.

9. At all times Defendant Noe interacted with Plaintiff or her house on September 30, 2025, Noe acted within the scope of his employment with the City of Mauston.

FACTS

10. On September 30, 2025, Defendant Noe was dispatched to Plaintiff's house after her son reported that his mom was yelling at him.

11. After Noe arrived at Plaintiff's house, Plaintiff's son exited the house, and Noe spoke with Plaintiff's son outside the house.

12. Noe then opened the front door and walked inside Plaintiff's house.

13. Plaintiff told Noe to get out of her house.

14. Noe refused to leave Plaintiff's house and proceeded to walk further into the house.

15. Noe searched throughout the upstairs and main level of the house.

16. Noe did not have a warrant authorizing him to enter Plaintiff's home.

17. Noe did not obtain consent to enter Plaintiff's home.

18. There were no exceptions to the warrant requirement permitting Noe to enter Plaintiff's home or remain there after being asked to leave.

19. As a direct and proximate result of the acts of Defendant Noe, as detailed above, Plaintiff suffered, *inter alia*, mental distress and humiliation.

COUNT 1:

42 U.S.C. § 1983 Claim for Unlawful Entry and Search of Home

20. Plaintiff realleges the above paragraphs.

21. The actions of Defendant Noe in entering, searching, and refusing to leave Plaintiff's home without a warrant or any other permissible lawful reason to do so violated Plaintiff's Fourth Amendment right to be free from unreasonable search and seizure. Noe is thus liable under Section 1983.

22. The aforementioned actions of Defendant Noe were the direct and proximate cause of the constitutional violations set forth above and of Plaintiff's injuries and damages set forth above.

WHEREFORE, pursuant to 42 U.S.C. §§ 1983 & 1988, Plaintiff demands actual or compensatory damages against Defendant Noe and because he acted in reckless disregard for Plaintiff's rights, punitive damages; the costs of this action, attorneys' fees; and such other relief that the Court deems just and equitable.

**COUNT 2:
Indemnification Claim Against City of Mauston**

23. Plaintiffs realleges the above paragraphs.

24. Wisconsin law, WIS. STAT. § 895.46, requires public entities to pay any tort judgment for damages for which employees are liable, for acts within the scope of their employment.

25. At all times relevant to this action, Defendant Noe engaged in the conduct complained of while he was on duty and in the course and scope of his employment with the City of Mauston.

WHEREFORE, Plaintiff asks this Court to find that the City of Mauston is liable to defend this action against Defendant Noe and to satisfy any judgment entered against him, by virtue of WIS. STAT. § 895.46.

JURY DEMAND

Plaintiff hereby demands a trial by jury, pursuant to FED. R. CIV. PRO. 38(b), on all issues so triable.

Respectfully submitted,

Dated: 16 December 2025,

STRANG BRADLEY, LLC
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