

JUDGE ELLIOTT M. LEVINE  
Circuit Court Branch 2

265.50

La Crosse County WI  
FILED

NOV 12 2013

PAMELA RADTKE  
CLERK OF COURTS

Nancylee M. Brady  
W21650 Linden Road  
Galesville, WI 54630

DISTRICT COURT OF LA CROSSE COUNTY  
333 Vine ST La Crosse, WI 54601

Nancylee M. Brady  
W21650 Linden Road  
Galesville, WI 54630  
Plaintiff,  
vs.  
Israel and Jennifer McKinney

) Case No.: 13CV 732  
)  
) Code: 30301  
) Summons to appear  
)  
)  
)  
)

Defendant

TO: Israel and Jennifer McKinney,

A lawsuit has been commenced against you in the above-entitled Court by the Plaintiff. Plaintiff's claim is stated in the Complaint served with this Summons. In order to defend against this lawsuit, you must respond to the Complaint by filing an answer to the court of La Crosse County stating your defense in writing and serving a copy to the Plaintiff within 20 days after the service of this Summons, excluding the day of service. A default judgment may be entered against you if you do not appear at the court appointed hearing.

Dated this 12<sup>th</sup> day of November, 2013

*Nancylee M. Brady*  
Nancylee M. Brady

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Galesville, WI 54630

DISTRICT COURT OF \_\_\_\_\_ LACROSSE COUNTY \_\_\_\_\_

Nancylee M. Brady ) Case No.: 13CV432  
Plaintiff, )  
vs. )  
Israel and Jennifer McKinney ) COMPLAINT  
Defendant )  
)  
)  
)  
)

Plaintiff Nancylee Brady brings forth the following causes of action and alleges the following:

1. Plaintiff is an individual and resident of Galesville, WI
2. Defendants, at the time, were residents in Mound, MN (1616 Beachwood Rd)
3. On or about April 15, 2008 Defendant (Israel) contacted plaintiff requesting a loan of \$50,000.
4. On or about April 15, 2008 Plaintiff agreed to loan the defendants \$50,000 with the verbal promise that it would be paid back over the next twelve months with an additional \$5000 interest.
5. Defendants have made only small payments over the last five and one half years with the first payment being February 1<sup>st</sup>, 2010 for \$500. The total payments received to date is \$7699.50
6. Plaintiff loaned almost all the money she had in her Schwaab account from her husband and son's death and has lost the interest from that money that she lived off of.

Plaintiff brings forth the following counts and allegations supporting her cause

of action:

COUNT 1 - NEGLIGENCE

Defendants have failed to repay the money loaned in a timely manner.

DAMAGES

Plaintiff has suffered emotionally and physically from the stress of financial ruin as a result of not being paid back. She is only able to work twelve hours per week due to her health. Meanwhile the defendants seem to be living a life of luxury; traveling to Dubai, Bora Bora, Las Vegas, and Tennessee just in the last 12 months. Defendants earn in excess of \$20,000 per month.

Plaintiff has at times had to miss going to church for lack of gas money. Her normal standard of living has been considerably altered since the loan has been defaulted on.

Plaintiff has learned from her financial advisor (Jeff Lokken) that she would have earned \$13,383.04 from her \$50,000 over the course of the last five and one half years.

WHEREFORE, Plaintiff seeks compensatory damages in the amount of \$66,683.54

Original loan amount	\$50,000
Interest promised	\$ 5,000
Interest lost	\$13,383.04
Attorney fee and court cost	\$6000
Less amount paid back	(7,699.50)
Total	\$66,683.54

Dated this 12<sup>th</sup> day November 2013

*Nancy M. Brady*

| F | I | M | group

October 30, 2013

Nancylee McKinney Brady  
W21650 Linden Road  
Galesville, WI 54630

Dear Nancylee,

To answer your question as to what the \$50,000.00 withdrawal from your account on April 15<sup>th</sup>, 2008 would be worth today, I have determined the following:

1. Average annual return for all clients in the same risk category is 4.32%
2. 5.5 per year at 4.32% is \$63,383.04.

I hope you find this helpful.

Sincerely,  
Financial & Investment Management Group, Ltd



Jeffrey M. Lokken, CFP, ChFC  
Managing Director, Senior Planner

/bd

M&I Bank

### Money Transfer Request

MTC Phone: (800)511-9966 or (414)765-8070 FAX: (414)765-8026

Customer Requests Only For Non-Customer Requests (Bank Policy Exception) Contact the MTC Manager (414)765-8072.

Branch / Department Information					
Branch/Department Name Onalaska			Mail Code 098-0932-00		
Representative Sue Wrobel			Phone Number 608-783-9141		
Originator Information					
Individual Requesting Transfer Nancy Lee Thiede					
Account Number 24907652		Account Name Nancy Lee Thiede			
Street Address 457 2 <sup>nd</sup> Av N		City Onalaska		State WI	Zip 54650
Telephone Number 608-783-9141					
Customer Verification					
<input type="checkbox"/> In Person Request		Document one form of Primary ID in the Identification box below.			
<input checked="" type="checkbox"/> Phone Request		Document two responses used to identify the customer in the Identification boxes below.			
<input type="checkbox"/> Not In Person - Other		Check method received: <input type="checkbox"/> Letter <input type="checkbox"/> Fax <input type="checkbox"/> E-mail All amounts require a phone call. Document 2 responses received in call back to ID the customer below.			
Identification: social security number 388-58-3336			Identification: last deposit / balance 4/15/08 \$50,000 charles schwab balance 51,470		
Authorized Signer Confirmed <input checked="" type="checkbox"/> Yes			Account Status Codes and Holds Reviewed <input checked="" type="checkbox"/> Yes		
U.S. Dollar Transfer	Foreign Currency Transfer		Payment Method		
Amount \$50000.00 Fee \$18.00 Total \$5018.00 ✓	Foreign Currency Amount Exchange Rate Foreign Currency Type U.S. Dollar Amount Fee \$ Total		Charge Account # 24907653 Available Balance 51740 ✓ Cash Received Approved By Other (Lender) Additional Information		
Beneficiary Information					
Bank ID (routing # or codes) 091915664			Beneficiary Account # 3102655		
Bank Name Klein Bank - Chaska			Beneficiary Account Name Isreal McKinney		
Bank Street Address 301 Chestnut St			Beneficiary Street Address 6016 Beachwood Rd		
City Chaska	State MN	Zip 55318	City Mound	State MN	Zip 55364
Bank/Branch Location:					
Payment Details:					
Purpose of the Transfer: family support to son					
Routing Instructions:					
Authorization - In Person Request (The Bank is authorized to initiate the transfer described above.)					
Customer Signature:			Date:		
Authorization - Phone or Other Not In-Person Request (Refer to Money Transfer Procedures for Call Back requirements.)					
Call Back Required: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					
Name of Customer Called to Confirm: Nancy Lee Thiede				Customer Phone Number: 608-865-1001	
Called by: <i>Stacy Doyt</i> ✓					
Branch/Department Authorization					
Accepted by: Sue Wrobel		<i>Sue Wrobel</i> ✓		Approved by: <i>[Signature]</i> ✓	
Date: 4/15/2008		Date / Time of FAX (Optional):			
MTC Representative: Kelly ✓		MTC Reference Number: 7036 ✓			
FOR USE BY MTC					
Initiated By:			Call Back By:		

Nancy Lee Brady provided Jennifer McKinney and I a loan. The amount was \$50,000.00, the date was 2008. At the time of the loan the \$ was used as a cash injection in my exterior replacement company and to pay overdue and current family bills. We were to repay Nancy Lee within 12 months plus \$5,000.00 for lending the \$50,000.00 to us. The exterior replacement company became a skeleton of what it was previous to the fall of 2008. Contributing factors of marriage separation, Jennifer's refusal to support the family business, and financial stresses lead to us being unable to repay Nancy Lee in the 12 month time frame.

Jennifer began writing on a popular mommy blog and Professional Photography to support our family. She has, at times, made payments to Nancy Lee. Since the fall of 2008 Jennifer has been the primary income earner. She currently supports the family in a network marketing company called Xyngolar. She has agreed to pay \$250/week to Nancy Lee. However she is inconsistent in doing so. Nancy Lee has been more than patient with us. With Jennifer's \$10k +/- month income and many weeks no \$ from us she doesn't know how to secure the \$ we owe her.

Israel McKinney 11.12.2013  


COVER LETTER

TO: CLERK OF COURT AND LACROSSE COUNTY JUDGE

FROM: PLAINTIFF NANCYLEE M. BRADY

I REQUEST THAT A COURT DATE TO APPEAR BE SET AS SOON AS POSSIBLE.

I WILL BE REPRESENTING PRO SE.

THANK YOU,

NANCYLEE M. BRADY

W21650 WINDEN RD  
Galesville, WI 54630  
608-865-1001

CASE NO:

13CV732

Pull File  
R

Set for telephone  
Scheduling Conf.

La Crosse County WI  
FILED  
DEC 03 2013  
PAMELA RADTKE  
CLERK OF COURTS