

STATE OF WISCONSIN
COURT OF APPEALS
DISTRICT 2

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OCT 13 2016
CLERK OF COURT OF APPEALS

Case No. 2016 AP 000836

LEE KLEINHANS

Petitioner-Appellant,

v.

SHEBOYGAN COUNTY

Respondent-Respondent.

REPLY BRIEF OF PETITIONER-APPELLANT
LEE KLEINHANS

Decision of the Sheboygan County Circuit Court, Case No.
2015TR005218
The Honorable Rebecca L. Persick, Presiding

LEE F. KLEINHANS
W6675 Porters Lake Rd
Wautoma, WI 54982
262 221 4298

ARGUMENT

- I. The Trial Court Erred When it made a decision without proper understanding of the MUTDC. The Wisconsin MUTDC manual states the size and the placement of highway road signs also sets precedence onto the Sheboygan County Highway Department placement of highway road signs and the responsibility of language used. That language is to be understood by the municipal police department and be followed through without profiting by when not clearly marked roadways. The 70 citations within a 4 ½ month period of time will prove preponderance evidence that the motorist was being deceived by the Sheboygan County Police Department. The only detour sign was placed on the highway 43 off ramp for county trunk A north to be closed when the culvert was going to be replaced after October 31st 2015. The Police Department cited Wis. Stat.346.04(2)(failure to obey sign signal) In their language road closed. The highway department never had such intent or ruling from the MUTDC site plan.

CONCLUSION

The Sheboygan County Police dpt. Creating their own sign language mislead the circuit court and the District Attorney's office as well as the defendant Lee Kleinhans making believe the road was closed when the hwy department stated quite the opposite.

Submitted, October 8th 2016

Pro se Lee F. Kleinhans