

CF

State of Wisconsin**Circuit Court****Grant County**

STATE OF WISCONSIN

Plaintiff,

DA Case No.: 2015GT000692

Assigned DA/ADA: Lisa A. Riniker

-VS-

Agency Case No.: 15-569

Court Case No.:

Cheryl A. Bartels

63044 CTH N

Prairie du Chien, WI 53821

DOB: 12/16/1956

Sex/Race: F/W

Eye Color: Brown

Hair Color: Brown

Height: 5 ft 5 in

Weight: 195 lbs

Alias:

CLERK OF CIRCUIT COURT
FILED

JUL 15 2015

TINA McDONALD, Clerk
GRANT COUNTY, WIS.**Criminal Complaint****15CF 109**

Defendant,

Craig W. Reukauf, of the Grant County Sheriff's Department, being first duly sworn, states that:

Count 1: DELIVER ILLEGAL ARTICLES TO INMATE

The above-named defendant on or about Sunday, March 01, 2015, in the City of Boscobel, Grant County, Wisconsin, delivered to an inmate of a prison an I-Pod Touch, contrary to sec. 302.095(2) Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

Count 2: DELIVER ILLEGAL ARTICLES TO INMATE

The above-named defendant on or about Tuesday, May 12, 2015, in the City of Boscobel, Grant County, Wisconsin, delivered to an inmate of a prison, an I-Pod Touch, contrary to sec. 302.095(2) Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

Count 3: DELIVER ILLEGAL ARTICLES TO INMATE

The above-named defendant on or about Saturday, June 06, 2015, in the City of Boscobel, Grant County, Wisconsin, delivered to an inmate of a prison, an I-Pod Touch, contrary to sec. 302.095(2) Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

07/15/2015

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Count 4: DELIVER ILLEGAL ARTICLES TO INMATE

The above-named defendant on or about Sunday, June 07, 2015, in the City of Boscobel, Grant County, Wisconsin, delivered to an inmate of a prison, an I-Pod Touch, contrary to sec. 302.095(2) Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

Count 5: DELIVER ILLEGAL ARTICLES TO INMATE

The above-named defendant on or about Monday, June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, delivered to an inmate of a prison, an I-Pod Touch, contrary to sec. 302.095(2) Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

Count 6: DELIVER ILLEGAL ARTICLES TO INMATE

The above-named defendant between May 15, 2015, to June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, delivered to an inmate of a prison a light gray Adidas t-shirt, contrary to sec. 302.095(2) Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

Count 7: DELIVER ILLEGAL ARTICLES TO INMATE

The above-named defendant between May 15, 2015, to June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, delivered to an inmate of a prison a dark gray Adidas t-shirt, contrary to sec. 302.095(2) Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

Count 8: DELIVER ILLEGAL ARTICLES TO INMATE

The above-named defendant between May 15, 2015, to June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, delivered to an inmate of a prison Adidas socks, contrary to sec. 302.095(2) Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

Count 9: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF

The above-named defendant between March 15, 2015, to June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with EAG who was confined in a correctional institution, penis to vagina intercourse in a closet on Charlie Unit, contrary to sec. 940.225(2)(h) Wis.

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Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

Count 10: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF

The above-named defendant between March 15, 2015, to June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with EAG who was confined in a correctional institution, penis to vagina intercourse in a closet on Charlie Unit, contrary to sec. 940.225(2)(h) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

Count 11: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF

The above-named defendant between March 15, 2015, to June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with EAG who was confined in a correctional institution, penis to vagina intercourse in a closet on Charlie Unit, contrary to sec. 940.225(2)(h) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

Count 12: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF

The above-named defendant between March 15, 2015, to June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with EAG who was confined in a correctional institution, oral sex in a break room on Delta Unit, contrary to sec. 940.225(2)(h) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

Count 13: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF

The above-named defendant between March 15, 2015, to June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with EAG who was confined in a correctional institution, oral sex in a break room on Delta Unit, contrary to sec. 940.225(2)(h) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

Count 14: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF

The above-named defendant between March 15, 2015, to June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with EAG who was confined in a correctional institution, sexual contact by touching of the penis and touching of defendant's breasts, contrary to sec. 940.225(2)(h) Wis. Stats., a Class C Felony, and upon conviction may be fined not

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more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

Count 15: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF

The above-named defendant between March 15, 2015, to June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with EAG who was confined in a correctional institution, sexual contact by touching of the penis and touching of defendant's breasts, contrary to sec. 940.225(2)(h) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

Count 16: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF

The above-named defendant between March 15, 2015, to June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with EAG who was confined in a correctional institution, sexual contact by touching of the penis and touching of the defendant's breasts, contrary to sec. 940.225(2)(h) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

Count 17: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF

The above-named defendant between March 15, 2015, to June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with EAG who was confined in a correctional institution, sexual contact by touching of the penis and touching of the defendant's breasts, contrary to sec. 940.225(2)(h) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

Count 18: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF

The above-named defendant between March 15, 2015, to June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with EAG who was confined in a correctional institution, sexual contact by touching of the penis and touching of the defendant's breasts, contrary to sec. 940.225(2)(h) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

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Count 19: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF

The above-named defendant between March 15, 2015, to June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with EAG who was confined in a correctional institution, sexual contact by touching of the penis and touching of the defendant's breasts, contrary to sec. 940.225(2)(h) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

Count 20: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF

The above-named defendant between March 15, 2015, to June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with EAG who was confined in a correctional institution, sexual contact by touching of the penis and touching of the defendant's breasts, contrary to sec. 940.225(2)(h) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

Count 21: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF

The above-named defendant between March 15, 2015, to June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with EAG who was confined in a correctional institution, sexual contact by touching of the penis and touching of the defendant's breasts, contrary to sec. 940.225(2)(h) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

Count 22: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF

The above-named defendant between March 15, 2015, to June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with EAG who was confined in a correctional institution, sexual contact by touching of the penis and touching of the defendant's breasts, contrary to sec. 940.225(2)(h) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

Count 23: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF

The above-named defendant between March 15, 2015, to June 15, 2015, in the City of Boscobel, Grant County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with EAG who was confined in a correctional institution, sexual contact by touching of the penis and touching of the defendant's breasts, contrary

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to sec. 940.225(2)(h) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

PROBABLE CAUSE:

Complainant is a detective for the Grant County Sheriff's Department. On June 16, 2015, complainant responded to the Wisconsin Secure Program Facility, a prison located in the City of Boscobel, Grant County, Wisconsin, regarding contraband which had been discovered on June 15, 2015.

Complainant met with Joni Shannon-Sharpe, a lieutenant at the Wisconsin Secure Program Facility, who indicated that on June 15, 2015, at approximately 7:00 pm she was called to a fight between two inmates, one of whom was EAG. Complainant was informed by Lieutenant Shannon-Sharpe that an inventory was conducted of EAG's property, and that an I-Pod Touch was found in his cell. Complainant was informed by Lieutenant Shannon-Sharpe that staff browsed the I-Pod Touch to determine the owner, and saw several nude photos of Cheryl Bartels, the defendant in this criminal complaint, who was a correctional officer at the Wisconsin Secure Program Facility. Complainant collected the I-Pod as evidence and made contact with the defendant and the defendant agreed to speak with the complainant.

Complainant was informed by the defendant that she was employed as a correctional officer at the Wisconsin Secure Program Facility from May 8, 2000, until that day, June 16, 2015. Complainant was informed by the defendant that approximately one year ago, she and inmate EAG began exchanging letters to each other and began talking sexual in the letters to each other. Complainant was informed by the defendant that she considered inmate EAG to be her boyfriend, and that they were planning on being together after he was released from prison. Complainant was informed by the defendant that approximately two to three months ago, she brought an I-Pod Touch into the prison, and gave it to inmate EAG so he could listen to music. Complainant was informed by the defendant that she and inmate EAG would exchange the I-Pod one to two times per week, and that they eventually started exchanging sexual pictures and videos of each other using the device. Complainant was informed by the defendant that the I-Pod found in inmate EAG's property was hers and that she gave complainant permission to review the contents of the device for the investigation.

Complainant extracted data from the defendant's I-pod Touch and found there to be several photos and videos of the defendant and of inmate EAG.

Complainant observed the first image of inmate EAG was dated 4/15/15 and was taken in what appears to be his prison cell. Complainant observed a photo of the defendant dated 4/25/15 which appeared to be taken somewhere other than the prison. Complainant observed another photo of inmate EAG dated 5/12/15 which appears to have been taken in EAG's prison cell. Complainant observed another photo of the defendant dated 6/5/15 which appears to have been taken outside of the prison. Complainant observed another

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photo of inmate EAG dated 6/6/15 which appears to have been taken in EAG's cell. Complainant observed another photo of the defendant dated 6/7/15 which appears to have been taken outside of the prison. Complainant observed another photo of inmate EAG dated 6/7/15 which appears to have been taken outside of the prison. Complainant observed other photos of the defendant dated 6/9/15, 6/11/15, and 6/13/15 which appear to have been taken outside of the prison.

Complainant was informed by the defendant that approximately one month ago, she brought in a gray Adidas t-shirt and gave it to inmate EAG.

Complainant also spoke with Investigator Nicole Raisbeck of the Department of Corrections who was conducting her own investigation. Complainant was informed by Investigator Raisbeck that she had also spoken to the defendant, and that the defendant had admitted to her that she had vaginal intercourse with inmate EAG in the closet on Charlie Unit beginning the end of March, 2015. Complainant was informed by Investigator Raisbeck that the defendant indicated that the I-Pod was first exchanged in March, 2015.

Complainant requested to meet with the defendant again, and the defendant agreed. Complainant was informed by the defendant that she told him half-truths the first time they spoke. Complainant was informed by the defendant that she brought in two Adidas t-shirts and three pairs of Adidas socks into the prison and gave them to inmate EAG. Complainant knows that two Adidas t-shirts, one light gray, and one dark gray, were collected by Wisconsin Secure Program Facility staff during the inventory of inmate EAG's property, and was subsequently collected as evidence by complainant. Complainant also knows that three pair of black Adidas socks also found during the inventory of inmate EAG's property were collected and turned over to complainant as evidence. Complainant is familiar with the rules and regulations of the Wisconsin Secure Program Facility and knows that an I-pod Touch would be considered contraband, and also knows that non-state issued clothing is not allowed.

Complainant was informed by the defendant that she and inmate EAG had penis to vagina intercourse three times in a closet at the end of Range 1 on Charlie Unit. Complainant was informed by the defendant that inmate EAG would ejaculate inside of her and that they would use towels to clean up and throw the towels away in the compost room. Complainant knows that two towels were collected from the closet as evidence on Charlie Unit.

Complainant was informed by the defendant that inmate EAG also performed oral sex on her in the break room on Delta Unit and that this occurred two or three times.

Complainant was informed by the defendant that there was also sexual contact between inmate EAG and herself, separate from when they would have sexual intercourse, and that the sexual contact involved inmate EAG touching her breasts and the defendant touching inmate EAG's penis and that the sexual contact occurred between the two at least ten times.

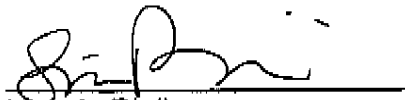
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Complainant states that he believes the incriminatory information from the defendant to be truthful and reliable because that incriminatory information is against the defendant's best penal interests.

Based on the foregoing, the complainant believes this complaint to be true and correct.

Subscribed and sworn to before me,
and approved for filing on:

This 15TH day of July, 2015.



Lisa A. Riniker
District Attorney


Craig Reukauf, Complainant

State Bar No. 1036164

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