

FILED
08-18-2023
Clerk of Circuit Court
Waukesha County
2023CF001296

STATE OF WISCONSIN CIRCUIT COURT WAUKESHA COUNTY

STATE OF WISCONSIN

Plaintiff,

vs.

Johanna J Grace
2612 West Hadley Street
Milwaukee, WI 53206
DOB: 07/01/1990
Sex/Race: F/B
Eye Color: Brown
Hair Color: Brown
Height: 5 ft 3 in
Weight: 210 lbs
Alias:

Deborah J Link
N6796 Church Road
Burlington, WI 53105
DOB: 01/04/1958
Sex/Race: F/W
Eye Color: Blue
Hair Color: Brown
Height: 5 ft 7 in
Weight: 160 lbs
Alias:

Defendant.

DA Case No.: 2023WK001015
Assigned DA/ADA: Susan L. Opper
Agency Case No.:

Court Case No.:
ATN:

Court Case No.:
ATN:

CRIMINAL COMPLAINT

The undersigned, of the Waukesha County District Attorney’s Office, being first duly sworn on oath, upon information and belief, states that:

Count 1: ABUSE OF RESIDENTS OF PENAL FACILITIES (As to defendant Johanna J Grace)

The above-named defendant on or about Tuesday, January 16, 2023, at Waukesha County jail, in the City of Waukesha, Waukesha County, Wisconsin, the defendant did, while employed in a correctional facility, abuse, neglect or ill-treat a person confined in that place, to-wit: Victim A, contrary to sec. 940.29, 939.50(3)(i) 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: ABUSE OF RESIDENTS OF PENAL FACILITIES (As to defendant Deborah J Link)

The above-named defendant on or about Tuesday, January 16, 2023, at Waukesha County jail, in the City of Waukesha, Waukesha County, Wisconsin, the defendant did, while employed

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in a correctional facility, abuse, neglect or ill-treat a person confined in that place, to-wit: Victim A, contrary to sec. 940.29, 939.50(3)(i) 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.

PROBABLE CAUSE:

And prays that the defendant be dealt with according to law; that the basis for complainant's charge of such offense is: Based on the reports of Detective Frankow of the Washington County Sheriff's Department, believed in this instance to be truthful and reliable.

Detective Frankow reports that on January 17, 2023, at approximately 6:50 a.m., he was advised of an in-custody death occurring at the Waukesha County Jail located at 515 West Moreland Boulevard in the City of Waukesha, Waukesha County, Wisconsin. The Waukesha County Sheriff's Department requested the Washington County Sheriff's Department lead an independent investigation into the death of an inmate, later identified as Victim A. Detective Frankow and other members of the Washington County Sheriff's Department then responded to the Waukesha County Sheriff's Department.

Detective Frankow reports that he learned that on January 16, 2023, at approximately 4:00 p.m., Victim A was arrested during a traffic stop for a probation violation. Victim A was subsequently transported to the Waukesha County jail to be held on the warrant. On January 17, 2023, at 6:05 a.m., during a wellness check, Victim A was discovered deceased in his jail cell.

Detective Frankow further reports that Victim A had been housed in the Transfer Cell (TC) corridor of the jail, in cell TC3. The TC cells are located on the ground floor of the Waukesha County jail, adjacent to the east intake room and also adjacent to the sally port for the jail. The TC corridor consists of four individually occupied "dry" cells, that is, cells which do not have running water or toilet. No other items or fixtures are in the jail cell.

Detective Frankow further reports that on January 18, 2023, he attended the autopsy of Victim A performed by Waukesha County Medical Examiner Dr. Lynda Biedrzycki. During the autopsy, Dr. Biedrzycki did not note any observable signs of trauma other than those caused during life saving measures. During the internal examination, approximately 42 grams of foreign material was located inside Victim A's stomach. The evidence appeared to be bindles of contraband. The bindles were weighed and tested by Detective Williams and determined to be five bindles totaling 9.73 grams of cocaine.

Detective Meier reports that he interviewed Lieutenant Tamez of the Waukesha County jail. Lieutenant Tamez was the third shift supervisor working from 11 p.m. until 7 a.m. Lieutenant Tamez reports that he had been advised by Lieutenant Johanna Grace, the second shift supervisor, that Victim A might have swallowed something. Lieutenant Tamez also was told that Victim A was evaluated by the nurse and there were no concerns. Lieutenant Tamez also stated that Victim A had denied swallowing anything.

Lieutenant Tamez further stated that prior to 4:30 a.m., on January 17, 2023, he had no contact with Victim A. At approximately 4:30 a.m., Lieutenant Tamez completed a round of

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checks. Lieutenant Tamez is required to complete one round of checks per shift. During the 4:30 a.m. check, Lieutenant Tamez observed that Victim A was laying without his shirt on, face down on the mattress, and breathing. Lieutenant Tamez had no further observation or interaction with Victim A until a back-up call was made at approximately 6:05 or 6:06 a.m. Lieutenant Tamez responded directly and arrived almost immediately, estimated within one minute. Upon arrival, C.O. Gabor and C.O. Pietruszka were present. The door to Victim A's cell was open and Victim A was still lying face down on the mattress. Victim A was shaken and Lieutenant Tamez observed fluid coming out. Lieutenant Tamez then immediately asked another officer to call 911.

Detective Lieutenant Kemps reports that he also responded to investigate and spoke with Nurse Justin Baker. Nurse Baker stated that he was the night shift nurse for the jail. He is employed by Well Path Medical Services, which Waukesha County contracts with to provide medical services in the jail. Nurse Baker stated that his shift started at 11 p.m. on January 16, 2023. Nurse Baker stated that he was not aware of any concerns about Victim A. Nurse Baker stated the first time he specifically became aware of Victim A was around 1 a.m. on January 17, 2023. At that time, Lieutenant Tamez called him with concerns about the medical questionnaire. Nurse Baker stated that Lieutenant Tamez was concerned about Victim A and the potential for COVID. Nurse Baker stated that he reviewed the medical questionnaire, which indicated that Victim A believed he had COVID. It was further documented that Victim A was sweating profusely, but that he did not have a temperature. Nurse Baker reviewed the medical form and the answers that had been provided by Victim A. Nurse Baker stated that because Victim A was vaccinated and did not have a temperature, Nurse Baker did not have any concerns about COVID and he passed that along to Lieutenant Tamez. Nurse Baker stated there was no other reason to be concerned about with Victim A because he was not on "MDF" status. Nurse Baker explained that this is the status that inmates are put on if there is some medical concern that needs to be closely monitored.

Nurse Baker further stated that Victim A was being housed in a dry cell, which meant that he needed to do hydration checks at the end of every shift. Nurse Baker stated it was during the hydration check that Victim A was found deceased around 6:00 a.m. This was Nurse Baker's first contact with Victim A. Nurse Baker stated that as part of the hydration check, he needs to ensure that the inmate is adequately hydrated, which includes checking their mucus membranes. Nurse Baker stated that he was not able to wake up Victim A from outside the cell, which is what led to them going into the cell and finding him deceased.

Lieutenant Kemps also interviewed C.O. Alejandro Albiter. C.O. Albiter was responsible for the booking process of Victim A. C.O. Albiter stated Victim A was brought in around 5:00 p.m. by the Waukesha Police Department. C.O. Albiter conducted his first of two pat-downs of Victim A while he remained handcuffed in the Intake area. C.O. Albiter asked Victim A some basic medical questions including COVID protocol during intake. Victim A denied experiencing any COVID symptoms or being around anyone with COVID and denied taking any substances to include alcohol and drugs. Victim A was then accepted into the jail. The handcuffs were removed and he was patted down a second time by C.O. Albiter. He was checked through the body scanner by C.O. Albiter, but C.O. Albiter saw nothing of concern. C.O. Albiter stated that because Victim A had a Felony warrant through DOC, a strip search was required. C.O. Albiter escorted Victim A to the strip search area and Victim A entered a stall. Victim A undressed and handed his clothing out of the stall to C.O. Albiter. Almost immediately, C.O.

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Albiter observed Victim A make a sharp turn so that his back was to C.O. Albiter. C.O. Albiter observed Victim A's hand go to his mouth and C.O. Albiter then began hearing choking or gagging sounds. C.O. Albiter believed Victim A was trying to ingest something. C.O. Albiter stated that he called on the radio for help but that per policy, he was not allowed to enter the stall with Victim A until backup was present. C. O. Albiter stated that because he was so concerned that Victim A was ingesting something, he technically violated policy and actually reached into the stall and grabbed Victim A to stop the ingestion. As soon as backup arrived, C.O. Albiter moved into the stall fully and performed a "wall stun", centralizing Victim A. At this time, pieces of plastic fell from Victim A's face.

C.O. Albiter reports that Victim A was then brought back out to booking where he met with the Jail Nurse Deborah Link, Captain Palmer, and Lieutenant Grace. Nurse Deborah Link is employed by Well Path Medical Services, which Waukesha County contracts with to provide medical services in the jail. Victim A denied ingesting anything or needing any medical attention. Nurse Link then cleared him for acceptance into the jail. A second strip search was conducted and Victim A was placed inside TC3 sometime after 5:00 p.m.

C.O. Albiter stated that at around 7:00 p.m., they pulled him back out to finish the booking process. C.O. Albiter noted that when they finished booking Victim A, he was sweating profusely. C.O. Albiter noted that he had not been like this when he first came into the jail. C.O. Albiter stated that throughout the booking process, Victim A denied taking any alcohol or drugs. Once he was booked, Victim A was returned to his cell and C.O. Albiter had no further contact with him.

Lieutenant Kemps further interviewed Nurse Deborah Link. Nurse Link was the second-shift nurse on duty at the time of the ingestion. She reported that she was called down to booking for a possible ingestion. She said she met with Victim A and was told that he tried eating some plastic bags during the booking process, but that he was denying ingesting anything. Victim A told Nurse Link that he tried to eat the plastic bags because they contained THC residue and he did not want to get into any further trouble. Nurse Link said she continued to question him about ingestion and needing medical attention, but that he adamantly denied both. Nurse Link stated she did not see any reason for medical concern. Nurse Link stated that she believed Victim A because he seemed so genuine and adamant. Nurse Link stated that she did not send Victim A for medical clearance or put him on any medical protocol whatsoever. Nurse Link stated that she did become aware of the fact that Victim A was reported to be sweating profusely and that when he was questioned about it, he thought it was because of COVID. Nurse Link stated that she checked on Victim A around 10:00 p.m. during hydration checks, and that he was sweating and she continued to question him about possible ingestion. Nurse Link stated that he had a couple of cups of water and continued to deny ingesting anything. When she continued to question him during the hydration check, he told her he was tired and just wanted to go lay down and go to bed. Lieutenant Kemps asked Nurse Link what information, if any, was passed onto the night shift nurse? Nurse Link said she told Nurse Baker to "keep an eye" on Victim A because of possibly ingested something. Nurse Link stated this was an informal conversation and that she had not entered Victim A into a formal medical watch. Nurse Link stated she did not place Victim A on medical watch because "there was no reason to believe he had taken anything."

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Lieutenant Kempfs further interviewed Lieutenant Johanna Grace. Lieutenant Grace was the on-duty lieutenant during the booking of Victim A. Lieutenant Grace stated that she first had contact with Victim A when she responded to the change-over room for the help call from C.O. Albiter. Lieutenant Grace stated that they then called Nurse Link to evaluate Victim A. Lieutenant Grace stated that Victim A repeatedly denied taking anything and he seemed fine and normal at this time. Lieutenant Grace reports that Nurse Link said she did not have medical concerns and Victim A was placed into his cell.

Lieutenant Grace stated that when they did intervene with Victim A during the strip search, they located two plastic bags on the floor. One of them she described as being "knotted off." Lieutenant Grace reports that Victim A told them it was "weed" and that he did not want another charge.

Lieutenant Grace stated that when Victim A was brought back out to finish the booking process, he was sweating. This was concerning to her and she questioned him about it. Victim A smiled at her when she would ask him what he had taken. At one point, Lieutenant Grace was present when Victim A was brought to the bathroom around 7:00 p.m. Lieutenant Grace stated that based on her observations, she was concerned that he was under the influence. She noted he was sweating and his eyes were wide and glossy. Lieutenant Grace stated that the defendant continued to deny taking anything. She asked him to submit to a urine sample, but he refused. Lieutenant Grace stated that when she last checked on him at the end of her shift, she heard him snoring and he seemed less sweaty.

SECOND INTERVIEWS

On January 31, 2023, witnesses were interviewed a second time.

Detective Conforti conducted a second interview with C.O. Albiter. C.O. Albiter explained that during the process to get Victim A changed into a jail uniform, Victim A opened the stall door and looked at C.O. Albiter at which time C.O. Albiter observed Victim A's mouth "puffed up" as if something were inside. C.O. Albiter proceeded to call for a "backup" and Victim A turns away from C.O. Albiter with C.O. Albiter now only able to view Victim A's back. C.O. Albiter said that while Victim A was turned away he observed Victim A place both of his hands into his mouth as if he was attempting to force something down his throat. C.O. Albiter said he could hear Victim A gagging and despite several orders to spit out what he had, Victim A continued to try and swallow the unknown item(s).

C.O. Albiter said per policy, he is not allowed to enter the stall without backup. Lieutenant Grace ultimately arrived to assist C.O. Albiter, at which time he entered the stall and attempted to stabilize Victim A against the wall. C.O. Albiter said that at no time did he witness Victim A insert an item into his mouth and that he first noticed the abnormality when Victim A's mouth was "puffed up." C.O. Albiter said that during this time Victim A was resistive by refusing to allow C.O. Albiter to place his hands behind his back and continuing to force whatever was in his mouth down his throat. C.O. Albiter said that eventually, he was able to stabilize Victim A against the wall and secure his hands behind his back at which time Victim A spit out a clear empty plastic bag. Despite repeated attempts by C.O. Albiter, Victim A would not disclose what he swallowed and made mention that the police would "link the plastic bag to whatever they found in his car."

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C.O. Albiter was present during the discussion between Victim A and Nurse Link. He said that Nurse Link repeatedly asked Victim A what he swallowed. C.O. Albiter did not recall Nurse Link asking any medical questions or recall witnessing Nurse Link obtain any vital signs from Victim A. C.O. Albiter said that Nurse Link completed her assessment of Victim A saying "he is fine." When asked how that made him feel, he said "to be honest I didn't feel comfortable with it, I do believe that ya' know, maybe he should have gone to the hospital but I don't, I personally myself, just being an officer, I can't do that, maybe lieutenants and captains can, but I mean ya' know she had no concern I believe. Lieutenants and captains just had us take him over to do his dress in, do another strip search, an actual complete one and transport him to his cell." C.O. Albiter said that he was "uneasy" with Nurse Link's assessment and believed that Victim A should have been transported to the hospital.

C.O. Albiter then escorted Victim A back to "dress in" and completed the strip search which was originally unable to be completed. C.O. Albiter did not locate any contraband on Victim A and he was placed in jail clothing and transported to transfer corridor cell #3. C.O. Albiter said that he had no further direct contact with Victim A throughout his shift. C.O. Albiter said that he saw Victim A during his shift while other Correctional Officers were completing the booking process. around 7:00 PM and observed that Victim A was "sweating very heavily".

Lieutenant Grace was also interviewed again by Detective Frankow. Lieutenant Grace stated that she feels that Victim A's death could have been prevented. Lieutenant Grace said that with what was told to Nurse Link, she should have just sent Victim A to the hospital. Detective Frankow asked Lieutenant Grace if she thought Victim A should have been sent to the hospital, then why did she not send him out? Lieutenant Grace replied, "Technically it's the nurse's call" and she could not overrule the nurse's assessment. Lieutenant Grace stated it was her opinion that Victim A should have been sent to the hospital since it was unknown what he had ingested. Lieutenant Grace said she noticed Victim A's condition deteriorating from the time he was booked to the end of her shift. She said she expressed her concerns with Nurse Link who attributed it to Victim A being symptomatic with COVID. She stated she did not record Victim A's ingestion or the backup call on her shift log because she informed Lieutenant Tamez personally.

Nurse Debbie Link was also interviewed again by Detective Frankow. Nurse Link said she was called to intake to assess Victim A after there was reason to believe he may have ingested something. She inspected the baggie that fell from Victim A's mouth which she described as "a little thing filled with spit." Nurse Link spoke with Victim A who denied several times that he ingested anything. She said he was talking fine and he did not show concerning symptoms; she cleared Victim A to stay at the jail. Later during Nurse Link's hydration check, she noticed that he was "a little sweaty" so she questioned Victim A a second time if he ingested anything and the COVID concerns, he denied both.

Nurse Link said during her last encounter with Victim A he was standing up and talking fine. Nurse Link said she knows that Victim A could have been lying to her about ingesting something, but she figured by the end of her shift he would have been showing signs of impairment which he was not. Nurse Link said she did not add notes in Victim A's medical records about the hydration check but she stated Lieutenant Grace was with her and Nurse Link thought she would have documented their contact with Victim A.

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Nurse Link stated she was never informed about Victim A's decline in condition; her only contact involving Victim A was during the initial call for ingestion and then during Victim A's hydration check. She did not have concerns about Victim A because he appeared to be fine, other than being a little sweaty, and he denied ingesting anything. Nurse Link admitted that Victim A's sweating was "a little bothersome" and she probably should have sent him to the hospital. She was "on the fence about sending him out", but Lieutenant Grace never suggested to send Victim A to the hospital, otherwise she would have. Nurse Link said at the end of her shift, she told Nurse Baker to keep an eye on Victim A.

Detective Frankow then spoke to Nurse Baker again and he stated that towards the end of Nurse Link's shift, she informed him that Victim A was caught chewing on a baggie, however, after she assessed him, she had no concerns. He also stated that nothing of concern was noted in Victim A's medical chart other than him having possible COVID symptoms.

Detective Frankow also re-interviewed C.O. Barry. C.O. Barry stated that he responded to C.O. Albiter's duress alarm involving inmate Victim A in the dress-in room. He was present during Nurse Link's initial assessment after the reported ingestion and then took part in Victim A's 7:30 PM booking process two hours later. C.O. Barry noticed a pronounced change in Victim A's condition between the supposed ingestion and booking times. While Victim A was being booked, he was sweating profusely, so C.O. Barry questioned Victim A again about what he ingested; Victim A again denied.

C.O. Barry said he told Nurse Link during Victim A's hydration check (9:30 PM) about his changing conditions, including Victim A having depth perception, pinpoint pupils, and difficulty balancing. C.O. Barry heard Nurse Link tell Victim A, "You weren't like this when I initially did the assessment. " "Now you're making me doubt myself, I should send you out." Following that comment by Nurse Link to Victim A, he overheard a conversation between Nurse Link and Lieutenant Grace where Lieutenant Grace was inquiring if they should send Victim A to the hospital. Lieutenant Grace told Nurse Link "if you want to send him out we can do that, he's on checks already." Nurse Link replied that Victim A could die within the timeframe of the checks.

Timeline of events:

Detective Frankow reports that based on all the interviews and viewing video surveillance from the jail of the events, he was able to summarize a timeline as follows:

Approximately 7:00 PM; Victim A appears to be uncomfortable in his jail cell. He begins to sweat and he is seen wiping his face and head with his shirt.

7:19 PM; Victim A removes his shirt and fans himself; he is noticeably sweating profusely.

7:29 PM; Victim A is escorted from his cell by C.O.s Barry and Hastings to use the dress-in bathroom and then finish the booking process.

7:31 PM; Lieutenant Grace enters the dress-in room while Victim A is using the bathroom. C.O. Barry and Lieutenant Grace are seen talking to each other. C.O. Barry informs Lieutenant

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Grace that Victim A is having balance issues and his pupils are constricted to the size of needles.

7:34 PM; Victim A exits the bathroom stall and he is given a towel to wipe his face and head of sweat. Victim A is escorted from dress-in by C.O.s Barry and Hastings, followed by Lieutenant Grace.

7:35 – 7:42 PM; Victim A is at the Intake Podium where he is questioned by C.O. Pendley as part of his continued booking process. C.O. Pendley completes the "Waukesha County Sheriff Inmate Medical/Mental Health History" questionnaire. One of the questions is, "Does this inmate show signs of abnormal sweating?" C.O. Pendley answers this question "Yes" then notes "Sweating Profusely." Victim A is asked if he experienced night sweats within the last 6 months. And his reply is "Yes". At the end of the questionnaire, the C.O. completing the form is asked "Was the shift supervisor notified of any concerns regarding this inmate? And if Yes who?" C.O. Pendley recorded that Lieutenant Grace was notified of the medical concerns. Also in the additional concerns section of the form, C.O. Pendley recorded Victim A believes he may have Covid-19. At the bottom of the questionnaire was a handwritten note "0 MDV Concerns 1-16-23 D. Link". This is indicative of the fact that Nurse Link reviewed the questionnaire and signed off, and she further notes no medical needs.

7:43-7:52 PM; Victim A is in the Print Room where his booking photo and fingerprints are taken. Victim A is also provided an identification bracelet. Victim A is still sweating profusely, wiping his face with his shirt. He is provided paper toweling to wipe his face prior to his booking photo; he also appears to be swaying. C.O. Barry reports asking Victim A again if he ingested anything and Victim A responds, "It's not like that, I didn't take anything."

7:53 PM; Victim A is returned to his cell TC3C, his 15 minute checks continue.

8:00 PM; Captain Palmer ends her shift, Lieutenant Grace is now the Officer in Charge of the jail. Captain Palmer stated that near the end of her shift, she had phone contact with Lieutenant Grace. During that contact, Lieutenant Grace did not say anything to her about Victim A's changing condition.

9:35-9:40 PM; Nurse Link conducts an end-of-shift hydration check of Victim A; also present is Lieutenant Grace and C.O. Barry. Lieutenant Grace and C.O. Barry state they inform Nurse Link on Victim A's worsening condition. Nurse Link stated she was only informed about Victim A being sweaty and having depth perception issues. Nurse Link again questioned Victim A about possibly ingesting something and COVID concerns. Victim A denied the ingestion. C.O. Barry reported that Nurse Link commented "You didn't look like this when I saw you last." "Now I'm doubting myself about not sending you out to the hospital."

According to Health Services Administrator James Matthews, RN, a hydration check is to be completed by the Jail Nurse once per shift and involves the nurse examining the inmate's eyes and or mouth to observe the mucus membranes, ensuring that the inmate is hydrated. Nurse Link is not observed on video to conduct such a check of Victim A.

10:46 PM; Nurse Link makes an entry into the Wellpath record and mistakenly puts it under the name of Victim A's father, who also happens to be an inmate of the Waukesha County Jail.

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Nurse Link is logged-in under Nurse Baker's account at the time and writes, "1/16/23 2000 called to intake pet LT had a baggy on person states he was chewing on it alert and orientated x3 denies taking any med." This is the only known medical log regarding Victim A's ingestion or physical condition.

11:00 PM; Lieutenant Grace is at the end of her shift and Lieutenant Tamez becomes the Officer in Charge. Lieutenant Tamez reports reading Lieutenant Grace's shift log which does not note any use of force incidents or the possible ingestion by Victim A. Lieutenant Tamez stated he spoke with Lieutenant Grace who informed him that 2nd shift was very busy. She explained that C.O. Albiter saw Victim A put something in his mouth but he turned it over before ingesting it. Lieutenant Grace also informed Lieutenant Tamez that Victim A was assessed by Nurse Link and she determined there was no need for further assessments.

11:00 PM; Nurse Link ends her shift. Nurse Baker stated Nurse Link told him in passing that an inmate may have eaten something during intake, but the inmate denied it.

4:34:51 AM; No observable movement by Victim A in his jail cell past this time.

6:05 AM; Victim A is found non-responsive during Nurse Baker's hydration check.

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

SLO:jam

EXT=CODE 1

Subscribed and sworn to before me on
08/18/23

Electronically Signed By:

Peter M. Tempelis

Assistant District Attorney

State Bar #: 1054579

Electronically Signed By:

Susan L. Opper

Complainant