

FILED
03-25-2026
CIRCUIT COURT
DANE COUNTY, WI
2026CF000719

ALJ 3/25/26 1:30 p.m.
Assign to Branch

STATE OF WISCONSIN CIRCUIT COURT DANE COUNTY

STATE OF WISCONSIN
Plaintiff,

Ref. Agency: Madison (City) Police
Department

DA Case No.: 2026DA002802

vs.

Assigned DA/ADA:

Agency Case No.: 2026-00123774

DIAMOND S WALLACE

Court Case No.: **26CF**_____

3037 Webb Ave
Madison, WI 53714

ATN: 13016501136643

DOB: 07/12/1994

Sex/Race: F/B

CRIMINAL COMPLAINT

Eye Color: Brown

Hair Color: Black

Height: 5 ft 4 in

Weight: 130 lbs

Alias: Also Known As Diamond

Simone Wallace

Defendant,

For Official Use

The below-named complaining witness being first duly sworn states the following:

Count 1: FIRST DEGREE INTENTIONAL HOMICIDE

The above-named defendant on or about Sunday, March 22, 2026, in the City of Madison, Dane County, Wisconsin, did cause the death of CAJ, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a) Wis. Stats., a Class A Felony, and upon conviction shall be sentenced to imprisonment for life.

Count 2: POSSESSION OF A FIREARM BY A FELON

The above-named defendant on or about Sunday, March 22, 2026, in the City of Madison, Dane County, Wisconsin, did possess a firearm, having been convicted of a felony in this state, contrary to sec. 941.29(1m)(a), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

FACTS:

Your complainant is a court officer with the City of Madison Police Department and for this complaint is relying on the written police report(s) submitted by City of Madison Police Detective(s) Jared LaPorta.

Detective LaPorta reports on March 22, 2026, at approximately 7:56 a.m., Madison Police Officers responded to the parking garage of a hotel located in the 300 block of W Washington Avenue, in the City of Madison, Dane County, Wisconsin, for a report of an individual who was

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found on the ground of the parking lot. This incident involves an individual who was later identified as DIAMOND S. WALLACE, the defendant.

Call notes indicated that the caller believed that this individual, who was identified and for this complaint is referred to as CAJ, had fallen, and Madison Fire Department (MFD) units were dispatched accordingly. Upon arriving at the scene, located on Level D of the parking garage, MFD personnel indicated that CAJ had sustained a gunshot wound that did not appear self-inflicted, and CAJ was ultimately pronounced deceased at the scene. CAJ's gunshot wound was later confirmed by Natalie Taylor, M.D. of the Dane County Medical Examiner's Office to have entered her body in the mid-back and exited through her abdomen, moving left to right in a downward direction, which was consistent with defects found in CAJ's clothing. Dr. Taylor indicated that the preliminary cause of death was homicide and preliminary manner of death was a gunshot wound to the torso (perforating). A single .380 caliber shell casing was located near where CAJ was lying on the ground. No firearm was located on scene. The headstamp of this .380 shell casing was marked "PMC."

In subsequently investigating this homicide, Madison Police Department (MPD) detectives reviewed City Traffic Camera footage and spoke with employees of the hotel, where CAJ was employed as a housekeeping supervisor. In doing so, it was learned that CAJ's shift at the hotel began at 8:30 a.m. and that she would typically arrive at the garage at 8:00 a.m. in order to smoke before starting work. It was further discovered that CAJ drove a red Chevrolet Silverado with Wisconsin registration ending in X1985, which was found parked in a spot inside of the parking garage on Level C, one level below where her body was found. A Trump hat was visible in the front windshield of CAJ's vehicle. Per hotel staff, CAJ would typically park her vehicle and then walk up the parking ramp, itself, to Level D, where there was access to the hotel. Review of city traffic camera footage from the W Washington Avenue and Broom Street camera yielded footage of a red truck proceeding down the driveway towards the garage from W Washington Avenue at approximately 7:38 a.m. MPD personnel spoke with a witness who indicated that she believed she heard a single gunshot from her nearby apartment at approximately the same time.

While speaking with hotel staff, MPD personnel learned that a former employee, verbally identified as Diamond S. Wallace, was believed to have been involved in this incident and responsible for CAJ's death. Per Wisconsin Department of Transportation (DOT) search, Wallace had changed her name to Sainte La Rell Vargas in April of 2025. Hotel staff, including the general manager, referred to Vargas as Diamond, and advised MPD personnel that Diamond had several incidents of returning to the hotel and causing disturbances or otherwise expressing threatening behavior since having been terminated from hotel employment in April of 2025. The general manager, whose initials form the letters MCM, further informed MPD personnel that she had filed for a temporary restraining order against Wallace due to her past conduct. Additional investigation also yielded information that Wallace had previously broken an employee's phone in April of 2025 and was believed to have slashed CAJ's tires on her Chevrolet Silverado around the same time in 2025, as well. While there appeared to be no official police report made regarding the tire slashing incident, CAJ's family informed MPD officers that the hotel had paid for the necessary repairs to CAJ's vehicle and thus may have an internal incident report documenting the same. Wallace had additionally previously accused CAJ of being racist and had expressed animosity towards CAJ for being a Trump supporter. Hotel staff further reported that Wallace blamed CAJ for her termination and had threatened her after she was terminated. In speaking with CAJ's daughter, it was learned that CAJ had

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previously complained about Wallace for laziness at work prior to Wallace's termination from the hotel.

In reviewing security camera footage from the garage, VCU Detective Joseph Buccellato described what appeared to be two separate and distinct figures on Level D of the garage at or about the time of the homicide. From a camera titled "DW-ENHD16-Channel 3," at 7:42:29 a.m., the footage shows what appeared to be a grainy figure walking from right to left near the top of the screen. It appeared that this would be on the path of travel of a person walking from the location of CAJ's truck to the location where CAJ was found deceased on scene if this person walked through the parking structure itself rather than using the staircase in the northwest corner of the parking structure. This person then walks out of sight after being obstructed by a pillar in the parking structure at approximately 7:42:31 a.m. This grainy figure appears to be moving at a standard casual walking pace.

At 7:42:31, the footage shows what appears to be a second grainy figure moving from right to left at the top of the screen. This grainy figure appears consistent with a person following the approximate same path as the first grainy figure. This second grainy figure appears to be moving significantly faster than the first grainy figure and it appears to be movement consistent with a person running. At approximately 7:42:37 a.m., this second person becomes obstructed by the concrete pillar.

At approximately 7:42:38 a.m., this second fast moving grainy figure emerges on the other side of the concrete pillar and still appears to be moving quickly. This grainy figure now appears to be in the approximate area where the fired cartridge casing was found on scene. This grainy figure then appears to become obstructed for a very brief period of time by some apparent exposed plumbing near the ceiling of the parking structure at approximately 7:42:40 a.m. At approximately 7:42:43 a.m., this fast moving grainy figure emerges again and appears to run from left to right across the screen back down toward Level C of the parking structure.

At 7:42:47 a.m., the footage shows what appears to be movement directly to the right of the concrete pillar and just above a red box attached to the pillar. This movement appears to be consistent with a person falling to the ground and this person is in the approximate area where CAJ was located deceased on the ground.

MPD personnel also reviewed garage security camera footage from the camera titled "DW-ENHD16-Channel 11." This camera appears to be positioned at the northwest corner of the parking structure, on the outside of the parking structure, facing north. This camera primarily captures the courtyard area on the north side of the parking structure between the parking structure and the Expansive office building. At approximately 7:43:01 a.m., footage from this camera depicts a subject appear to exit the parking structure at the northwest staircase exit point on Level C. This person appears to be wearing a blue hooded sweatshirt with the hood up. This person appears to exit the parking structure and immediately turn left and walk toward the pedestrian walkway that leads from the northwest corner of the parking structure between the condo buildings and out onto S Broom Street. Upon showing an image of the individual wearing this sweatshirt, Hotel staff additionally noted that they knew Wallace to have previously worn a similar looking sweatshirt of the same color.

On March 23, 2026, US Postal Inspector Jeremy Leder reported locating a mail forwarding request with the name Sainte Vargas from 3037 Webb Avenue, Apartment 12, in the City of

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Madison. Wisconsin DOT records listed 3037 Webb Avenue, Apartment 12 for Diamond Wallace. Inspector Leder further reported that the mail forwarding request was for mail to be forwarded to 3324 Milwaukee Street, Apartment 14, in the City of Madison.

The apartment building, 3324 Milwaukee Street, is located on the corner of Milwaukee Street and Fair Oaks Avenue. Upon additional review of city traffic cameras, MPD detectives located footage at approximately 6:19 a.m. from the Milwaukee Street and Fair Oaks Avenue camera, which depicted an individual walking southbound onto S Fair Oaks Avenue, dressed in black pants, a blue hooded sweatshirt with the hood up, a black backpack, and dark shoes. Review of the city camera of MFD Station 3, located at 1217 Williamson Street, yielded footage of the same individual walking inbound (southbound) on Williamson Street at approximately 6:56 a.m. While walking past Station 3, this individual looks towards the camera and is readily identifiable as Diamond S. Wallace (Sainte La Rell Vargas) when compared to Wallace's DOT and Spillman photos.

Violent Crime Unit detectives and members of the MPD Gang and Neighborhood Crime Abatement Team surveilled the address and located Wallace as she exited the apartment building, taking her into custody thereafter. Detectives proceeded to execute a search warrant signed by Judge McNamara on 3324 Milwaukee Street, Apartment 14, during which they located a blue hooded sweatshirt and a .380 caliber Hi-Point handgun inside of a black backpack. The handgun was partially loaded and the ammunition bore the headstamp "PMC." A preliminary analysis comparing a test-fired casing from the firearm located inside of Wallace's apartment showed a correlation between the test-fired casing, the casing from the scene of CAJ's homicide, and the casing recovered from the scene of the shooting reported by Wallace's sister, whose initials form the letters CW.

In searching Wallace's criminal history, it was further discovered that Wallace had previously been involved in a weapons offense involving CW on January 13, 2026, in which CW reported that Wallace had fired a .380 handgun at CW while outside of her residence, but ultimately did not strike her. A shell casing was located from this prior incident that bore the headstamp "PMC." A preliminary analysis of the shell casing located near CAJ's body in the garage yielded a tentative correlation between this shell casing and the shell casing collected from the previous incident that occurred on January 13, 2026, indicating that the same firearm was likely used in both incidents.

In conducting a search of Wisconsin Circuit Courts Online, it was discovered that Diamond S. Wallace had a conviction due to a guilty plea for Resisting an Officer – Substantial Bodily Harm/Soft Tissue Injury, a Class H Felony, stemming from Dane County Case 2019CF514. Wallace entered a guilty plea to this charge on September 20, 2021 before Judge Genovese.

In subsequently interviewing Wallace at the Central District, she claimed to not have known the victim, CAJ, nor recalled having any incidents of note or disturbances with other employees of the hotel when she was employed there. Wallace indicated that she kept to herself and did not mix work with her personal life, further noting that she did not have contact with any hotel employee following the hotels employ. When asked to where she was on March 22, 2026, Wallace claimed that she had bought a Black and Mild from the gas station across from her residence before then going to work at PLS check Cashers located at 2722 E Washington Avenue in the City of Madison, where she worked all day from 8:00 a.m. to 7:00 p.m. Wallace further stated that she worked six days a week from open to close (8:00 a.m. to 7:00 p.m.), due

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to staffing shortages at work. In contacting PLS Check Cashers, however, MPD detectives reviewed Wallace's work schedule and learned that she last worked on March 21, 2026 from 10:00 a.m. to 6:00 p.m., and was not scheduled to work on March 22, 2026, nor on Monday, March 23, 2026. When asked, Wallace denied harming CAJ after being apprised as to the homicide in question. Wallace shortly, thereafter, declined to answer any additional questions and refused to provide a DNA sample, in accordance with the residential search warrant that had been signed by Judge McNamara.

POSSESSION OF A FIREARM BY A FELON

The above-named defendant was previously convicted of Resisting an Officer – Substantial Bodily Harm/Soft Tissue Injury, contrary to Wis. Stat. 946.41(2r), in Dane County Circuit Court Case Number 2019CF514, on September 20, 2021. The above-stated conviction remains of record and unreversed.

Your complainant has reviewed the Dane County Circuit Court records, maintained in the normal and ordinary course of business. Your complainant has referred to such records in the past and found them to be reliable.

Your complainant knows that a firearm is a weapon which acts by force of gunpowder.

****THIS COMPLAINT IS BASED ON** the information and belief of your complainant, who is a Court Officer for the city of Madison Police Department, and who learned of the above offense from the reports of city of Madison Police Officer(s) Jared LaPorta, which report your complainant believes to be truthful and reliable inasmuch as they were prepared during the course of the officer(s) official duties.

Further, your complainant believes the information furnished by the witnesses to be truthful and reliable inasmuch as they are citizen informant(s) and witnessed the events described.

Your complainant believes the statements of the Defendant(s) to be truthful and reliable insofar as they are admissions against penal interest.

Subscribed and sworn to before me on
03/25/26

Electronically Signed By:

John D. Rice

Assistant District Attorney

State Bar #: 1113462

Electronically Signed By:

TAYA M DOLSEN

Complainant