BOARD OF POLICE AND FIRE COMMISSIONERS
OF THE CITY OF MADISON

COMPLAINT

filed against a commissioned officer of the City of Madison Police or Fire Department by an aggrieved person, pursuant to 62.13(5), Wisconsin Statutes, and Rule 6 of the Board

Name of Complainant: David A. Hart and Kirbie Mack, BPSADC, Inc.

Street Address: P.O. Box 8571

City/ZIP: Madison, WI 53708

COMPLAINT AGAINST: Keil Baitinger-Peterson

STATEMENT OF CHARGES, made under oath or affirmation and subject to penalties for false swearing (Refer to Wisconsin Statute 62.13 and Board Procedural Rules):

Seeteo (2) page attachments.

STATEMENT OF CHARGES, continued. Copy and attach additional sheets as necessary.

Blacks for Political and Social Action of Dane County, Inc

COMPLAINT TO THE CITY OF MADISON BOARD OF POLICE AND FIRE COMMISSIONERS

July 24, 2026

BPSADC, INC
BLACKS FOR POLITICAL AND SOCIAL ACTION OF DANE COUNTY, INC

ATTY. DAVID HART
President

KIRBIE MACK
Vice President

RAY ALLEN
Executive Manager

TRACEY CARADINE
Treasurer

DR. CORINDA RAINEY-MOORE
Executive Secretary

MAAINA A. MACK
Assistant Executive Secretary

TO: The Board of Police and Fire Commissioners
City of Madison, Wisconsin
c/o City Attorney's Office / PFC Attorney
210 Martin Luther King Jr. Blvd.
Madison, WI 53703

Blacks for Political and Social Action of Dane County as an organization and individually named below, believe we have standing before this committee to file the following complaint:

STATEMENT OF CHARGES AND ALLEGED VIOLATIONS

The Complainant hereby alleges that the Respondent Officers violated Madison Police Department Policy, Madison Code of Ordinances, and Wisconsin Law regarding the Use of Force, De-escalation, and Professional Conduct during an encounter resulting in the death of Corey Ruiz. Specifically, the Complainant charges the Respondent(s) with:

1. Violation of MPD Standard Operating Procedure – Use of Non-Deadly and Deadly Force: Exceeding the objectively reasonable force required to handle the situation.
2. Violation of MPD Standard Operating Procedure – De-escalation: Failing to utilize proper de-escalation tactics when four officers had already contained the subject on the ground.
3. Failure to Intervene: Failure of the surrounding three officers to prevent the use of unnecessary deadly force by the primary shooter.

II. STATEMENT OF FACTS

1. On Wednesday, July 22, 2026, at approximately 1:30 p.m., Madison Police Department officers intercepted Corey Ruiz at the intersection of S. Baldwin Street and Williamson Street.
2. Four MPD officers engaged Mr. Ruiz in a physical struggle to take him into custody.
3. An officer deployed a Taser against Mr. Ruiz, which MPD leadership later deemed "unsuccessful".
4. Bystander video recordings captured by members of the public clearly show that Mr. Ruiz was tased, brought to the ground, and surrounded by

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four armed officers.

5. While Mr. Ruiz was on the ground, MPD Officer Kiel Baitinger-Peterson drew his department-issued firearm and fired exactly three close-range shots, striking Mr. Ruiz—including in the face—resulting in his death later that afternoon.

6. The amount of lethal force used by the standing officer against a restrained or grounded individual was grossly disproportionate, excessive, and a direct violation of community trust and department standards.

III. REQUEST FOR DISCIPLINARY ACTION

The Complainant requests that the Board of Police and Fire Commissioners schedule a full evidentiary hearing on this matter pursuant to Wis. Stat. § 62.13(5). The Complainant further requests that, upon a finding of cause, the Board order the immediate termination of the primary shooting officer from the Madison Police Department, and issue severe disciplinary suspensions or terminations for the remaining co-respondent officers who failed to intervene.

Respectfully submitted,

David A. Hart, Esq., President
BPSADC, Inc.

Kirbie G. Mack, Vice President
BPSADC, Inc.

STATEMENT OF SOURCES OF INFORMATION Those matters stated in the foregoing Statement of Charges which are not based on my personal knowledge are based on information which I obtained from the following sources (show names and addresses of individuals, or otherwise identify sources of such information):

See attachments.

SPECIFICATION OF VIOLATION I believe that the conduct described in the above Statement of Charges is a violation of the following departmental rule or rules, ordinances, laws, or other standards of conduct:

See Attachments.

VERIFICATION UNDER OATH

State of Wisconsin)
Dane County) ss

I, David A. Hart and Kirbie Mack, BPSADC, Inc. , the above-named Complainant, being duly sworn, on oath depose and state that I have read the foregoing complaint, and that I know that it is true and complete to my own knowledge, except as to those matters based upon information belief, and as to those matter I believe them to be true.

Complainant's signature: _____

Kirbie Mack

Subscribed and sworn to before me
this 24 day of June , 2024.

_____
Notary Public, Dane Co., Wisconsin
My commission: 2-12-2028

SHAWN P COOPER
NOTARY PUBLIC
STATE OF WISCONSIN