

FILED
05-31-2022
Circuit Court, Iowa Co
Lia N. Leahy, Clerk
2022CF000048

STATE OF WISCONSIN	CIRCUIT COURT	IOWA COUNTY
STATE OF WISCONSIN	DA Case No.: 2022IO000170	
Plaintiff,	Assigned DA/ADA: Matthew C. Allen	
	Agency Case No.: 02-22-52	
	22-1516	
vs.	02-22-52	
	Court Case No.: 2022CF000048	
JOANNA M. FORD		
818 Fair Street	ATN: 25002203310021	
Mineral Point, WI 53565		
DOB: 06/19/1992		
Sex/Race: F/W		
Eye Color:	SECOND AMENDED CRIMINAL	
Hair Color:	COMPLAINT	
Height: ;		
Weight: ;		
Alias:		
Defendant.		

For Official Use

Your Complainant, being first duly sworn, states that:

Count 1: FIRST DEGREE RECKLESS HOMICIDE

The above-named defendant on or about Friday, February 25, 2022, in the City of Mineral Point, Iowa County, Wisconsin, did recklessly cause the death of Wyatt D. Hamlin, under circumstances which show utter disregard for human life, contrary to sec. 940.02(1), 939.50(3)(b) Wis. Stats., a Class B Felony, and upon conviction may be sentenced to a term of imprisonment not to exceed sixty (60) years.

Count 2: NEGLECTING A CHILD - CONSEQUENCE IS DEATH

The above-named defendant on or about Friday, February 25, 2022, in the City of Mineral Point, Iowa County, Wisconsin, being a person responsible for the welfare of a child, Wyatt D. Hamlin, DOB 10/20/2021, through her action or failure to take action, for reasons other than poverty, did negligently fail to provide necessary care or medical care so as to seriously endanger the physical, mental, or emotional health of the child, and the child suffered death as a consequence, contrary to sec. 948.21(2)&(3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

Count 3: NEGLECTING A CHILD - SPECIFIED HARM DID NOT OCCUR AND CHILD UNDER 6 YEARS OF AGE

The above-named defendant on or about Friday, February 25, 2022, in the City of Mineral Point, Iowa County, Wisconsin, being a person responsible for the welfare of a child, JOHN DOE, DOB 03/29/2020, through her action, for reasons other than poverty, did negligently fail to provide necessary care so as to seriously endanger the physical, mental, or emotional health of the child, and the natural and probable consequences of this violation would be harm under 948.21(3) par (a), (b), (c) or (d), Wis. Stats., although the harm did not actually occur, and the child had not attained the age of six years when the violation was committed, contrary to sec. 948.21(2)&(3)(e), 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 4: NEGLECTING A CHILD - SPECIFIED HARM DID NOT OCCUR AND CHILD UNDER 6 YEARS OF AGE

The above-named defendant on or about Friday, February 25, 2022, in the City of Mineral Point, Iowa County, Wisconsin, being a person responsible for the welfare of a child, JANE DOE, DOB 07/29/2016, through her action, for reasons other than poverty, did negligently fail to provide necessary care so as to seriously endanger the physical, mental, or emotional health of the child, and the natural and probable consequences of this violation would be harm under 948.21(3) par (a), (b), (c) or (d), Wis. Stats., although the harm did not actually occur, and the child had not attained the age of six years when the violation was committed, contrary to sec. 948.21(2)&(3)(e), 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 5: NEGLECTING A CHILD - SPECIFIED HARM DID NOT OCCUR AND CHILD UNDER 6 YEARS OF AGE

The above-named defendant on or about Tuesday, February 1, 2022, in the City of Mineral Point, Iowa County, Wisconsin, being a person responsible for the welfare of a child, Wyatt D. Hamlin, DOB 10/20/2021, through her action, for reasons other than poverty, did negligently fail to provide necessary care so as to seriously endanger the physical, mental, or emotional health of the child, and the natural and probable consequences of this violation would be harm under 948.21(3) par (a), (b), (c) or (d), Wis. Stats., although the harm did not actually occur, and the child had not attained the age of six years when the violation was committed, contrary to sec. 948.21(2)&(3)(e), 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 6: NEGLECTING A CHILD - SPECIFIED HARM DID NOT OCCUR

The above-named defendant on or about Tuesday, February 1, 2022, in the City of Mineral Point, Iowa County, Wisconsin, being a person responsible for the welfare of a child, Ivan Case, DOB 01/31/2019, through her action, for reasons other than poverty, did negligently fail to provide necessary care so as to seriously endanger the physical, mental, or emotional health of the child, and the natural and probable consequences of this violation would be harm under 948.21(3) par (a), (b), (c) or (d), Wis. Stats., although the harm did not actually occur, contrary to sec. 948.21(2)&(3)(f), 939.51(3)(a) Wis. Stats., a Class A Misdemeanor, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 7: NEGLECTING A CHILD - SPECIFIED HARM DID NOT OCCUR AND CHILD UNDER 6 YEARS OF AGE

The above-named defendant on or about Tuesday, February 1, 2022, in the City of Mineral Point, Iowa County, Wisconsin, being a person responsible for the welfare of a child, JOHN DOE, DOB 03/29/2020, through her action, for reasons other than poverty, did negligently fail to provide necessary care so as to seriously endanger the physical, mental, or emotional health of the child, and the natural and probable consequences of this violation would be harm under 948.21(3) par (a), (b), (c) or (d), Wis. Stats., although the harm did not actually occur, and the child had not attained the age of six years when the violation was committed, contrary to sec. 948.21(2)&(3)(e), 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:

Your complainant is James Holmes, special agent for the Wisconsin Department of Justice, Division of Criminal Investigation ("DCI"), who in said capacity has read and reviewed the law enforcement and

other reports referenced below and believes them to be true and correct. The undersigned bases this complaint upon the following:

1. Complainant has review a report of City of Mineral Point Police Officer Eric Dunham ("Dunham") documenting an interview of RKG, DOB 09/26/1987 ("RKG"), who is the mother of JANE DOE, DOB 07/29/2016, and JOHN DOE, DOB 03/29/2020. In that report, RKG advises RKG arranged for Joanna Ford ("Ford") to provide daycare services for JANE DOE and JOHN DOE beginning October 2020 and ending on Monday, February 28, 2022. RKG indicates she generally dropped JANE DOE and JOHN DOE off at Ford's residence located at 818 Fair Street in the City of Mineral Point, Iowa County, Wisconsin, which is also the location Ford provides daycare services. RKG is quoted in the report as stating "[a]s far as I know the kids are always with [Ford]. If there's anything different, I have no idea. I wouldn't be very happy if there was, but as far as I know it was [Ford watching the children]."
2. Complainant has reviewed a report of City of Mineral Point Police Officer William Ottoway documenting an interview of RKG, who reported that RKG paid Ford for daycare services for JANE DOE and JOHN DOE the week of January 31, 2022 through February 4, 2022. RKG dropped JANE DOE and JOHN DOE off at Ford's residence at 818 Fair Street in the City of Mineral Point, Iowa County, Wisconsin at around 7:15AM on February 1, 2022. RKG contracted with Ford and expected Ford to provide care and a safe environment for JANE DOE and JOHN DOE. Ford never indicated anyone else would watch JANE DOE and JOHN DOE during the times Ford was to provide care, and RKG was not aware of anyone else other than Ford providing care. Ford would provide notification to RKG if Ford removed JANE DOE and JOHN DOE from the City of Mineral Point.
3. Complainant has reviewed a report of City of Dodgeville Police Officer Blake Weier ("Weier") documenting a statement from Kevin Brogley ("Brogley"), Asset Protection Associate for Wal-Mart Stores, Inc., who reported that Ford, whom Brogley recognized from previous Wal-Mart thefts, entered the Wal-Mart store located in the City of Dodgeville, Iowa County, Wisconsin on February 1, 2022 at 9:38AM and remained within that Wal-Mart location until 12:53PM on February 1, 2022.
4. Complainant has reviewed a statement offered by Weier drafted by Brogley wherein Brogley indicates that he observed Ford enter the City of Dodgeville Wal-Mart vestibule on February 1, 2022 at 9:38AM with only one child. The referenced child was located in a car seat, which was placed in a shopping cart by Ford while in Wal-Mart.
5. Complainant has reviewed a report of Mineral Point Police Officer Eric Dunham ("Dunham"), who reviewed video of Ford in the City of Dodgeville Wal-Mart on February 1, 2022. Dunham reports that he observed only one infant car seat with Ford, and that the child in the car seat appears to have a pink hat on and is possibly covered by a purple blanket. Dunham did not observe any other children or adults with Ford, other than a discussion with another unidentified adult female within Wal-Mart.
6. Complainant, with the assistance of Mineral Point Police Officer Eric Dunham ("Dunham"), conducted an interview of Kayla L. Case ("Case"), the mother of Wyatt D. Hamlin (DOB 10/20/2021, "Wyatt"), and Ivan Case (DOB 01/31/2019, "Ivan") and Case reported that on the morning of February 1, 2022, William David Hamlin ("Hamlin"), the father to Wyatt had dropped Wyatt and Ivan off at Ford's house located at 818 Fair Street in the City of Mineral Point, Iowa County, Wisconsin, for daycare services provided by Ford at the residence. Hamlin took Wyatt and Ivan to the Ford residence at 8:00 AM or earlier. Ivan was in Ford's care until sometime between approximately 1:25 PM and 1:38 PM when Ford dropped off Ivan at Case's and Hamlin's residence. Wyatt remained in Ford's care until sometime after 4:00 PM. As the daycare provider for Wyatt and Ivan, Ford was responsible for their welfare while they were at

her residence. Ford was to be the sole care provider for Ivan and Wyatt. Case reported that Wyatt did not wear pink or purple clothing or hats. Case reviewed the baby carrier identified in video of the February 1, 2022 incident alleged herein, and Case indicated that baby carrier was not Wyatt's car seat.

7. Complainant has reviewed a report of DCI special agent Lourdes Fernandez documenting an interview of Case, the mother of Wyatt, who reported that on the morning of February 25, 2022, she dropped Wyatt off at Ford's house located at 818 Fair Street in the City of Mineral Point, Iowa County, Wisconsin, for daycare services provided by Ford at the residence. Wyatt's mother took Wyatt into the Ford residence in a baby carrier at 7:15 AM, at which time he was awake and smiling, and there were no issues at drop-off. As the daycare provider for Wyatt, Ford was responsible for Wyatt's welfare while he was at her residence.
8. Case indicated that at approximately 3:30 PM on the afternoon of February 25, 2022, Ford sent Case a video of Wyatt breathing fast. Wyatt was dressed only in his diaper, and after viewing the video, Case knew something was wrong with Wyatt. Ford sent Case a second video of Wyatt breathing in a way she had never seen before, as Wyatt was breathing really fast, and Case knew instantly that something was wrong. Case called Wyatt's biological father, William D. Hamlin ("Hamlin") and told Hamlin to pick Wyatt up from the Ford residence.
9. Complainant, with the assistance of DCI special agent Ryan Condon, conducted an interview of Hamlin, who indicated that, upon being asked by Case to pick up Wyatt from Ford's daycare on the afternoon of February 25, 2022, Hamlin immediately left his house, arriving at Ford's residence at around 3:47 PM. Upon Hamlin's arrival, Wyatt was dressed and in Wyatt's car seat. When Hamlin placed Wyatt into the rear seat of his truck, Hamlin observed that Wyatt was not looking right. Hamlin returned to his residence with Wyatt, but when Hamlin took Wyatt out of the car seat, Hamlin knew Wyatt was not right. Hamlin put Wyatt back into the car seat, buckled Wyatt, placed Wyatt in the truck, and drove Wyatt to the Upland Hills Health Hospital's emergency department in Dodgeville, WI.
10. Complainant has reviewed a report of Mineral Point Police Officer Eric Dunham documenting how he was contacted by the Upland Hills Health Hospital's Emergency Department on February 25, 2022, for a report of an infant in critical condition. Emergency room physician Dr. Michael Foley indicated that Wyatt's CT scan showed brain swelling. At that time, it was unknown if a respiratory event or trauma caused the swelling, but Wyatt was transferred to UW Hospital by Med-Flight at approximately 6:28 PM.
11. Wyatt died at the American Family Children's Hospital on March 1, 2022.
12. On Tuesday, May 24, 2022, Deputy Coroner for Iowa County, Virginia Forrest through Deputy Coroner for Iowa County Josh Taylor, provided the Complainant with a six-page PDF document that included the Final Forensic Autopsy Report documenting the autopsy findings of Forensic Pathologist Dr. Robert Corliss related to the autopsy he completed on Wyatt on March 3, 2022. The following information was listed as the 'Findings and Diagnoses' of Dr. Corliss:
 - I. Traumatic Brain Injury
 - A. Admitted to hospital approximately 4 days prior to death
 - B. Clinically diagnosed with:
 - i. Subdural hemorrhage
 - ii. Cerebral edema
 - iii. Bilateral retinal hemorrhages
 - C. Possible healing left tibia fracture by imaging (periosteal new bone, mid-distal medial tibia)
 - D. Died following withdrawal of supportive care in hospital

- E. Primary clinical discharge diagnosis of: "Severe Traumatic Brain Injury"
- II. Postmortem findings:
- A. Bilateral, thin subdural hemorrhage and severe brain swelling confirmed at autopsy
 - B. Diffuse hypoxic/ischemic brain injury consistent with 4 day interval of respiratory dependency
 - C. Diffuse Axonal Injury (DAI) by histology and multiple cervical nerve root hemorrhages identified
 - D. Bilateral retinal detachment, hemorrhage and retinoschisis by eye pathology (see report E22-00146)
 - E. No definitive acute or healing fracture of left tibia by histopathologic examination
 - F. Petechial hemorrhages over lateral left face and focally under right eye
 - G. Small (11 mm) blue contusion to posterior-superior right occipital scalp
 - H. No competing cause of death or evident natural disease at autopsy

The six-page document showed the electronic signature of Dr. Corliss on 5/20/2022 at 0855.

13. On Tuesday, May 24, 2022, Deputy Coroner for Iowa County, Virginia Forrest through Deputy Coroner for Iowa County Josh Taylor, provided the Complainant with a two-page PDF document that included the Final Eye Pathology Report (E22-00146) documenting the findings of Ophthalmic Pathology Services Chief Dr. Heather A. Potter related to the eye pathology evaluation Dr. Potter completed on Wyatt as documented in Dr. Potter's report that showed the electronic signature of Dr. Potter on 03/16/2022 at 1131. The following information was listed as the 'Final Diagnosis' of Dr. Potter:

- Specimen A:
- Retinal detachment
 - Retinal hemorrhage
 - Retinoschisis
 - Optic nerve hemorrhage and edema
- Specimen B:
- Retinal detachment
 - Retinal hemorrhage
 - Retinoschisis
 - Optic nerve hemorrhage and edema

14. Complainant has reviewed a 12-page PDF document from UW-Health which was a 'Consult Note' of Nurse Practitioner (N/P) Benjamin L. Eithun, of the University of Wisconsin Hospital Child Protection Program, in reference to Wyatt's injuries. N/P Eithun's Consult Notes, which were signed and filed on March 23, 2022, indicated in part:

- The patient arrived to referring hospital (Upland Hills in Dodgeville) just after 1600 (4:00 PM) on February 25, 2022.
- The University of Wisconsin Child Protection Program was consulted by Dr. Brinkman, Pediatric Trauma Surgeon for concern of physical abuse of a child given the injuries identified at the referring facility, specifically subdural blood products with diffuse cerebral edema in a child with no reported traumatic mechanism.
- The child was transferred by med-flight to the UW ED.
- Under the heading 'Impression and Recommendations' within N/P Eithun's consult notes, the following information was documented:
 - 'Wyatt Hamlin is a 4 month old male who is medically evaluated by the University of Wisconsin Child Protection Program for concern of physical abuse of a child.'

- 'The radiological findings were discussed with the neuroradiologist, the attending neurosurgeon an[d] the child abuse case review team. The hyperacute nature of the bleeding and the rapid progression between the CT at the referring and the MRI at AFCH are indicative of the injury occurring within hours prior to presentation rather than longer periods of time. On the MRI the dynamic perfusion maps demonstrated that the injury was catastrophic and spared only the brain stem. There were no vascular anomalies [sic] identified. Bilateral extensive retinal hemorrhages were identified and later confirmed by dilated ophthalmologic exam which found too numerous to count hemorrhages in sub-retinal, intra-retinal- and pre-retinal locations bilaterally.'
- 'Given the totally [sic] of the findings including a near complete insult to the brain sparing only the brain stem without an explainable mechanism physical abuse in the form of abusive head trauma is the cause of Wyatt's demise.'
- 'This case is being diagnosed as: Definitive physical abuse of a child.'

15. Complainant has reviewed a 3-page PDF document from UW-Health which were the 'Progress Notes' of Physician Assistant (P/A) Amanda L. Palm, of the University of Wisconsin Hospital Child Protection Program, in reference to Wyatt's injuries, and the following information was documented within P/A Palm's Progress Notes:
 - 'Writer reviewed findings from Wyatt's hospitalization to confirm UW Child Protection Program diagnosis. Full consultation was completed by NP Ben Eithun, please see his documentation for further and extensive details regarding this case.'
 - 'To ensure completeness of work-up, writer did review the screening genetic/metabolic laboratory tests that were performed and discussed with UW Genetics. Per UW Genetics, no underlying genetic/metabolic condition including glutaric aciduria was noted to explain Wyatt's constellation of symptoms.'
 - 'This information further supports the UW Child Protection Program diagnosis of definite physical abuse of a child.'
16. Complainant, with the assistance of Mineral Point Police Officer William Ottaway, conducted an interview of Ford on Sunday, February 27, 2022. During that interview, Ford indicated she was the only adult at the Ford residence on February 25, 2022, after her husband left at around 8:30 am. She indicated the only other people at the house with her on February 25, 2022 were children, including: Wyatt, a 1½ -year-old, and Ford's children, an 11-year-old (step-child), an 8-year-old, and a 6-year-old. Ford's children did not have school on February 25, 2022, so they remained home. Ford said her 11-year-old step-child and her 8-year-old child left the residence at approximately 11:00 AM and went to separate friends' residences, although subsequent investigation by Officer Dunham indicated the 11-year-old was present at the Ford residence until approximately 4:00 pm. Ford said the day was a normal day, that they did not really do anything that day, and that "We just hung out at the house."
17. During the interview of Ford, she provided verbal and written consent for a complete search and review of her cell phone. DCI Digital Forensic Examiner (DFE) Chris Byars subsequently conducted a forensic examination and compiled the contents of the exam of Ford's cell phone.
18. Complainant has reviewed a report of DCI special agent Ryan Condon, who reviewed the report compiled by DFE Byars with regard to the examination and content of Ford's cell phone. In a text message sent by Ford to a third party at 10:34:11 AM on February 25, 2022, Ford indicated that she had "an appointment at 2 in dodgeville." In a subsequent text sent to this party at 3:24:39 PM on February 25, 2022, Ford indicated she was "headed home now."
19. Complainant has reviewed reports of Mineral Point Police Officer Eric Dunham that documented Officer Dunham's contact with the owner of Vibe Body Art, which is located at the address of

107 N. Iowa Street, Dodgeville, WI. During these contacts, Officer Dunham was informed that Ford had been present at Vibe Body Art for an appointment on February 25, 2022, from approximately 2:00 PM to 3:00 PM. Officer Dunham was told that Ford had been alone during her appointment. Officer Dunham reviewed Vibe Body Art's surveillance camera footage that documented the front entry area of Vibe Body Art, and he viewed Ford enter the business on February 25, 2022, at approximately 2:02 PM and remain in the business until she left at approximately 3:21 PM. Officer Dunham did not observe anyone else with Ford during the entire time she was in Vibe Body Art.

20. Complainant has reviewed a report of DCI special agent Ryan Condon, who reviewed the report compiled by DFE Byars with regard to the examination and content of Ford's cell phone. Ford engaged in multiple texts with Wyatt's mother between 3:31:45 PM and 4:23:02 PM on the afternoon of February 25, 2022. In those texts, Ford described her observations of Wyatt's condition. After sending the aforementioned two (2) videos of Wyatt to Case, Ford texted her at 3:46:46 PM, "I would take him in. He's starting to scare me right now." Ford subsequently texted Case at 4:00:03 PM, "This isn't making sense. He was totally fine this morning." In a text sent to Case at 04:20:07 PM, Ford indicated "Not a single one [of the other kids] was near Wyatt today because they all played out back. They're still all playing actually and it's been just Wyatt me and [1-year old JOHN DOE] in the living room this afternoon."
21. Complainant has reviewed reports of Dunham that documented Dunham's contact with RKG, mother of JANE DOE and JOHN DOE. During this contact, RKG advised Dunham that RKG dropped JANE DOE and JOHN DOE off at Ford's residence in the City of Mineral Point for Ford to provide daycare services for JANE DOE and JOHN DOE on February 25, 2022. Officer Dunham reports that RKG dropped JANE DOE and JOHN DOE off at Joanna Ford's residence at 7:05AM on February 25, 2022 and picked JANE DOE and JOHN DOE up at the same residence at about 4:20PM on February 25, 2022.
22. Complainant has review the report of Detective Lana Bowers ("Bowers") of the Iowa County Sheriff's Office that documented Iowa County Social Worker Nicole Hamilton and Bowers's interview with CJF (DOB – 10/21/2010) on April 8, 2022. The interview was conducted due to a report that CJF was afraid to go home due to Ford and an aunt saying something about CJF hurting a baby. CJF advised that Ford had not said anything to CJF about CJF hurting a baby. CJF advised CJF did not hurt a baby.
23. In review of the above facts, Complainant asserts that Ford, as a person responsible for the welfare of Wyatt, Ivan, and JOHN DOE, because of their respective ages and needs, was negligent in leaving Wyatt, Ivan, and JOHN DOE at her residence unattended by an adult while she traveled to and remained at Wal-Mart in the City of Dodgeville, Iowa County, Wisconsin for over 3-hours on February 1, 2022. Although Ford had a child with Ford, the presence of the car seat, characteristics of the car seat and clothes on the child, and the age of the child with Ford in relation to the children entrusted in her care, lead the complainant to believe neither Wyatt, Ivan, or JOHN DOE were with Ford during that time period. The failure of Ford to be present to provide necessary care or medical care for Wyatt, Ivan, and JOHN DOE was negligent and created serious risk of physical harm or injury to Wyatt, Ivan, and JOHN DOE.
24. In review of the above facts, Complainant asserts that the conduct of Ford, as the sole care provider for Wyatt on February 25, 2022, was a substantial factor in producing Wyatt's death. That conduct, which is described by Dr. Corliss, NP Eithun, and PA Palm, and the resulting diagnosis by those three medical professionals, and Dr. Potter, created an unreasonable and substantial risk of death to Wyatt, and considering Wyatt's age, Ford must have been subjectively aware of that risk. The nature and pattern of injuries described on Wyatt postmortem in the referenced reports demonstrate Ford's utter disregard for human life.

25. In review of the above facts, Complainant asserts that Joanna Ford, as a person responsible for the welfare of Wyatt, was negligent in, but not limited to, leaving Wyatt at her residence unattended by an adult while she attended an appointment in Dodgeville on February 25, 2022. The failure of Ford to be present to provide necessary care or medical care for 4-month-old Wyatt was negligent and created serious risk of physical harm or injury to Wyatt, and Ford's conduct was a substantial factor in producing Wyatt's death.

26. In review of the above facts, Complainant asserts that Joanna Ford, as a person responsible for the welfare of JANE DOE and JOHN DOE, was negligent in leaving JANE DOE and JOHN DOE at her residence unattended by an adult while she attended an appointment in Dodgeville on February 25, 2022. The failure of Ford to be present to provide necessary care or medical care for 23-month-old JOHN DOE and the 5-year-old JANE DOE was negligent and created serious risk of physical harm or injury to JANE DOE and JOHN DOE, and the natural and probable consequences of Ford's conduct would be harm to JANE DOE and JOHN DOE.

Complainant believes the information provided by all law enforcement officers and special agents mentioned herein to be truthful and reliable as they are officers and agents who provided this information freely, in pursuit of their duties as law enforcement officers and agents. Complainant believes the information provided by Upland Hills Health Physician Dr. Michael Foley to be truthful and reliable because it was provided freely, in pursuit of his duties as a physician for Upland Hills Health. Complainant believes the information provided by UW Nurse Practitioner Benjamin Eithun and UW Physician Assistant Amanda Palm to be truthful and reliable as they provided this information freely, in pursuit of their duties as members of the University of Wisconsin Hospital Child Protection Program. Complainant believes the information provided by UW Physician Dr. Robert Corliss to be truthful and reliable because it was provided freely, in pursuit of his duties as a physician for UW Hospital. Complainant believes the information provided by UW Physician Dr. Heather A. Potter to be truthful and reliable because it was provided freely, in pursuit of his duties as a physician for UW Hospital. Complainant further believes the information provided by Kayla L. Case and William D. Hamlin to be truthful and reliable as they are citizen complainants and crime victims.

Subscribed and sworn to before me on Electronically Signed By:

05/31/22

James Holmes

Electronically Signed By:

Complainant

Curtis E. Johnson

Assistant District Attorney

State Bar #: 1053728