

STATE OF WISCONSIN

CIRCUIT COURT

KENOSHA COUNTY

STATE OF WISCONSIN,

Plaintiff,

v.

Case No. _____

G. JOHN RUFFOLO,

Defendant.

CRIMINAL COMPLAINT

Your complainant, Daniel Schauer, Detective for the Mount Pleasant, Racine County, Wisconsin Police Department, being duly sworn on oath and based on information and belief, states as follows:

COUNT 1: STALKING

The above-named defendant, G. John Ruffolo, did, on or about between February 2013 and July 2017, intentionally engage in a course of conduct directed at a specific person that would cause a reasonable person, under the same circumstances, to suffer serious emotional distress or to fear bodily injury or death to themselves or a member of their family; where the defendant knew or should have known that at least one of the acts that constitute the course of conduct would cause the specific person to suffer serious emotional distress or place the specific person in reasonable fear of bodily injury or death to themselves or a member of their family; and where the defendant's acts caused the specific person to suffer serious emotional distress or induced fear in the specific person of bodily injury or death to themselves or a member of their

family, contrary to Wis. Stat. § 940.32(2), a Class I felony, punishable by a fine not to exceed \$10,000 or imprisonment not to exceed 3 years and 6 months, or both.

FACTS:

The specific person the defendant stalked was a person with whom the defendant had a personal and eventually intimate relationship from approximately November of 2012 to approximately February of 2014, when the specific person terminated their personal and intimate relationship. By December of 2014 the specific person realized they could no longer even be friends and subsequently told the defendant in no uncertain terms that he was to no longer make any contact.

The defendant's acts toward this specific person since the specific person terminated their personal and intimate relationship with him has harassed this specific person and caused this specific person to fear for the specific person's physical safety. Even after being told no more contact at all, the defendant persisted in contacting the specific person's cellular telephone, home telephone and even work telephone, which the specific person is required to answer. The specific person told the defendant on numerous occasions to stop calling. The specific person blocked his known telephone numbers, yet he persisted in his unwanted contacts via other telephone numbers. He even left a voicemail acknowledging that his telephone number had been blocked, yet he would persist in calling from false telephone numbers that do not exist, using a "spoofing" app that generates the false telephone numbers when the caller using the app is calling.

After being told to leave the specific person alone, the defendant regularly drove past the specific person's home in Kenosha County, Wisconsin, and persists in doing so even to this day. Numerous times the defendant has parked his car in the neighborhood in such a way that he can

view the specific person's home from his car. Numerous times the defendant has driven through the specific person's workplace parking lot, which is not a through street or even a mall parking lot, but just a parking lot for the business, where the defendant had no business being. Numerous times when the specific person has been at friends' homes, or with friends at restaurants, the defendant drives by in such a way as to be able to see the specific person is there. The specific person has never given him permission to have contact since the specific person told him in no uncertain terms to have no more contact.

For a lengthy period of time when the defendant was engaging in this behavior, the specific person feared reporting the behavior out of feeling threatened that the defendant would retaliate. On October 27, 2015, when the specific person was not engaging in normal daily routine, the defendant still managed to pull behind and follow the specific person's vehicle for over 15 miles while the specific person was trying to run errands. On November 3, 2015, the specific person arrived home around 6:40 p.m. and by 6:50 p.m. the defendant was driving past the specific person's home, while the specific person was in the yard. The defendant beeped his car horn to get the specific person's attention. The specific person had ducked inside, but came out to exclaim to the defendant that he was not to have contact or come by the house. He exclaimed back that he had received a blocked call and had come by to ask if they were still dating. The specific person reported the behavior after these two serious events and expressed a desire that the defendant be formally warned by persons in authority that if he did not cease his conduct toward this specific person, that a more formal complaint would be pursued.

On November 16, 2015, Mount Pleasant Police Investigator Mark Haleen spoke with the defendant by telephone. The defendant acknowledged contacting the specific person in question. Investigator Haleen told the defendant that his continuing to contact the specific person by

telephone, by text message, or in any other way was unwanted behavior and that if the behavior did not stop, a complaint against him would be pressed. The defendant acknowledged to Investigator Haleen his receipt of this warning and agreed to cease any and all contact with the specific person. The specific person was advised that the requested warning had been issued to the defendant and the specific person agreed to contact law enforcement again if the conduct did not stop. It did not stop.

On Christmas Day 2015, the defendant again drove past the specific person's home, and contacted the specific person's family member and member of the specific person's household at the family member's workplace in Kenosha County, Wisconsin. Between January and February 2016, the defendant contacted the specific person's telephone at least seven times with fake or no caller ID numbers, sent one email message, and called on telephone numbers known to belong to him three times. When the specific person confronted him on the telephone on February 25, 2016, about why he was still making contact after being told by police not to, the defendant did not answer the question, but chose to respond by asking the specific person why so much "venom" (his word) against him.

Throughout March of 2016, the defendant left voice messages on the specific person's phone from blocked caller ID numbers, drove past the specific person's residence multiple times and had email contact, in disregard of the specific person's feelings regarding these contacts and the warnings of law enforcement officers. The defendant's behavior and conduct in defiance of the specific person's feelings and in defiance of law enforcement intervention caused the specific person to feel harassed and intimidated by the defendant.

The defendant's unwanted contacts with this specific person continued in April of 2016 with a multitude of telephone calls, and voicemails, at home and at work. The defendant also

sent emails, including emails using a fictitious email address of a person named "Julie" to a person associated with the specific person designed to send material to that other person for the purpose of providing information to that other person about the specific person and designed for it to get back to the specific person that the defendant had disseminated the negative information to the specific person's friend. The defendant again continued to drive past the specific person's home.

May 2016 began, as April had ended, with a telephone call to the specific person's workplace from the defendant's known listed telephone number, and then, day after day, telephone calls at work or home and driving past the specific person's home in the specific person's infrequently traveled neighborhood. A number of the telephone calls were again from numbers that could not be identified. When a number or area code with which the specific person was unfamiliar, came and the specific person answered, it was the defendant on the other end of the line. Between April 23 and May 14, there were at least 16 telephone calls of this sort to the specific person's cell phone and home phone from unidentifiable numbers. Throughout the rest of May of 2016, the specific person received over 30 telephone calls either directly from numbers associated with the defendant, or spoofed numbers. When the specific person blocked one of the spoofed numbers, immediately calls began coming in from new unknown and unidentifiable numbers from locations where the specific person knew no one. When the defendant did leave messages, they continued to be about seeing each other or getting together, in defiance of the warnings the defendant had received, and left the specific person more than just uncomfortable, but fearing for their personal safety. Specifically on May 25, 2016, when the defendant called the specific person's work number from an unidentifiable number and it became apparent that it was him on the other end, the specific person confronted the defendant about the

tooth pick lodged in the door lock of the specific person's home and warned the defendant to stay away from the specific person's home, to stay off the specific person's property and to stop sending messages, including messages to the specific person's friends, at which point the defendant abruptly hung up. The very next day, the defendant made 13 telephone calls to the specific person, ten from already blocked numbers, but three where he was able to get through and leave voicemails. On July 13, 2016, on his own email address, the defendant sent the specific person an email, subject line, "Think about it."

On September 10 and September 17, 2016, the defendant left very much unwanted flowers at the specific person's back door. He was caught on surveillance cameras driving past the specific person's home on September 17 and September 20, 2016. In fact, on September 17, 2016, the defendant exclaimed to the specific person when he drove past the residence and saw the specific person outside there, "I see your cameras," acknowledging that his unwanted behavior was being monitored and that he was going to persist in that harassing and intimidating behavior in spite of knowing that it was unwanted behavior. The specific person responded to the defendant's acknowledgement of video recording of his conduct by telling him to stay away from the specific person and to stay away from the specific person's property. As if to say he would not stop the illicit behavior, the defendant retorted, "I'm not on your property, I'm not on your property."

From September 2016 through November of 2016, a year after being warned by police to leave this specific person alone, the defendant was still persisting in his continuity of purpose of harassing the specific person. Via the internet, he sent the specific person links to various websites, photos and videos. He was video recorded driving extremely slowly past the residence of the specific person, again and again, lurking, waiting. He was video recorded placing an

object, a bottle of wine, on the specific person's front porch, with a handwritten note from him attached. He left multiple unwanted voicemails.

The defendant also persisted in contacting the specific person by telephone in November of 2016. He called on the specific person's cellular telephone, the specific person's work telephone, and left at least one message again asking the specific person to rekindle their relationship. When the defendant did not receive any kind of response to this entreaty, he escalated his conduct in December 2016, calling or sending emails to the specific person on December 5, 6, 7, 8, 12, 16, 17, 20, including references to knowing the whereabouts and activities of the specific person's adult working child. The defendant continued his conduct of driving past the specific person's residence multiple times in December 2016. Anonymous or "spoofed" calls from the defendant continued almost daily in December 2016.

In the new year, the defendant's behaviors did not abate, in spite of it being years since the specific person had ended their relationship and made clear over and over again, with the assistance of law enforcement, that the specific person wants nothing to do with this defendant. The calls, or blocked calls, persisted almost daily, and the defendant drove by the specific person's residence multiple times in January as well. The messages he did leave made clear that he knew what he was doing to the specific person. For example, on January 15, 2017, the defendant left a voicemail that begins with the defendant inquiring of the specific person when the specific person was going to let go of the hate for him, telling the specific person to call him back and explain the hate for him, and making clear that having seen the specific person driving caused the defendant to place the call and express his wish that the specific person get over the hate and explain to him why the specific person continues to hate him. The defendant repeated the same litany in another voicemail message he left for the specific person on January 21, 2017.

And the same messages continued into February 2017, including him saying, "You must hate me that much."

In February and March 2017, the defendant persisted in sending emails, spoofing telephone calls, and driving by the specific person's residence. His messages include insistence that they meet, that they talk, that it is, "Time to bury the hatchet." He drove in and around the parking lot of the specific person's workplace, which goes nowhere other than around the workplace, and was video recorded doing so.

After being ignored for months, or knowingly recorded and told to leave the specific person alone, the defendant persisted in April 2017 in insisting that they meet, and in driving past the specific person's home. This latter behavior was documented by the GPS tracking device placed on one of the defendant's cars pursuant to search warrant. He drove past the specific person's home days in a row, and sometimes multiple times in a day. On April 21, 2017, in spite of all prior warnings, at the specific person's residence, the defendant left a bouquet of flowers and a note once again insisting on contact with the specific person. This conduct was recorded by the specific person's home security system installed because of this defendant's conduct.

On May 1, 2017, Mount Pleasant Police personally served the defendant with a stalking warning letter. In that letter, the defendant was informed in no uncertain terms, that he was being investigated for his behavior towards the specific person, who was named in the letter, and that that behavior was stalking. The letter informed the defendant, "Stalking can be described as intentionally engaging in a course of conduct directed at a specific person that would cause a reasonable person under the same circumstances to suffer serious emotional distress, or place the specific person in reasonable fear of bodily injury. Your behavior has induced such fear or distress in the above named individual." The letter told the defendant that stalking is a crime in

Wisconsin, and that, “any future conduct by you towards the above named individual could result in arrest by law enforcement and prosecution by the Attorney General’s Office.”

Even after being served with the Stalking Warning Letter, and in spite of believing that the specific person “hates” him, the defendant continued to place himself in visual and physical proximity to the specific person. The GPS tracking device placed on the defendant’s vehicle showed him to be in visual and physical proximity to the specific person’s home in the following pattern:

DATE:	APPROXIMATE TIME:
May 2, 2017	8:00 p.m.
May 3, 2017	8:00 p.m.
May 5, 2017	1:00 p.m.
May 9, 2017	10:00 p.m.
May 10, 2017	11:00 a.m.
May 12, 2017	1:00 p.m.

After the GPS was reinstalled on the defendant’s vehicle pursuant to warrant, the following pattern of conduct was recorded of his vehicle driving within visual and physical proximity of the specific person’s home, unless another location is noted:

DATE:	APPROXIMATE TIME:
May 30, 2017	7:18 p.m. and 7:57 p.m.
May 31, 2017	8:30 p.m.
June 1, 2017	7:30 p.m.
June 2, 2017	2:37 p.m., front of residence, 2:41 p.m., behind residence
June 3, 2017	2:38 p.m.
June 6, 2017	8:50-8:52 p.m., circles the residence
	And returns at 9:42 p.m.
June 7, 2017	8:50-8:52 p.m.

June 8, 2017	6:26 p.m., 6:47-6:49 p.m., and at 9:20-9:23 p.m.
June 9, 2017	4:32 p.m. and then an hour later at 5:38 p.m.
June 10, 2017	1:23-1:25 p.m.
June 14, 2017	8:17-8:18 p.m.
June 15, 2017	12:25 p.m., and again at 10:32 p.m.
June 16, 2017	9:53-9:54 a.m., defendant travels through the specific person's workplace parking lot which puts her workplace in his visual and physical proximity
June 17, 2017	1:30 p.m.
June 19, 2017	11:38-11:39 a.m., 12:38 p.m. and 1:07 p.m., defendant drives within visual and physical proximity to specific person's workplace
June 20, 2017	8:08-8:10 p.m.
June 21, 2017	1:57 p.m.
June 21, 2017	6:54-7:19 p.m., defendant drives around specific person's workplace in physical and visual proximity
June 21, 2017	8:54-8:55 p.m.
June 21, 2017	10:30 p.m.
June 22, 2017	2:10 p.m.
June 22, 2017	3:01 p.m.
June 22, 2017	8:22 p.m.
June 22, 2017	8:27 p.m.
June 23, 2017	2:33-2:36 p.m.
June 26, 2017	8:38 p.m.
June 27, 2017	1:33-1:34 p.m., defendant drives around specific person's workplace in physical and visual proximity
June 27, 2017	9:06-9:07 p.m.
June 28, 2017	7:17 p.m., 8:07 p.m., and 9:11 p.m.
June 29, 2017	6:23-6:24, defendant circles specific person's home
June 30, 2017	11:40 p.m.

June 30, 2017

1:40 p.m.

The defendant returned his white Cadillac DeVille, Wisconsin registration 197 GWS, back to his home at 3508 13th Place, Kenosha, WI at the end of each day.

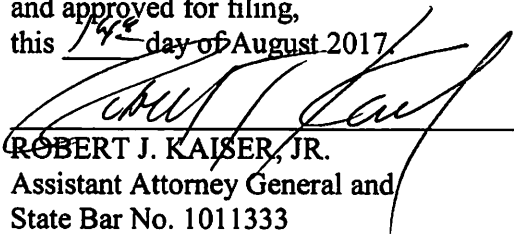
This complaint is based on the information and belief of your complainant who is a Detective for the Mount Pleasant, Wisconsin, Police Department and who learned of the above offense from information and belief, from personal observation and from information provided by Detective Mark Haleen which your complainant believes to be truthful, accurate and reliable because it was accumulated and provided pursuant to the officers' assigned duties. Further, your complainant obtained above information from the specific person who your complainant knows to be a truthful, accurate and reliable person as they have identified themselves personally to your complainant and have provided information that has been corroborated by your complainant, as described herein, including but not limited to the information provided by the GPS tracking device affixed to the defendant's vehicle and monitored by your complainant.

Dated this 14th day of August, 2017.



DANIEL SCHAUER
Detective, Mount Pleasant Police

Subscribed and sworn to before me,
and approved for filing,
this 14th day of August 2017.



ROBERT J. KAISER, JR.
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Subscribed and sworn to before me
This 14th day of August, 2017



Notary Public, State of Wisconsin
My Commission Expires: 02/21/2020