

STATE OF WISCONSIN

-VS-

William F Kramer
S39w27465 Brookhill Dr
Waukesha, WI 53189
DOB: 01/21/1965

Plaintiff,

DA Case No.: 2014WK001850
Assigned DA/ADA: Debra L. Blasius
Agency Case No.: 14-004606
Court Case No.:

SUMMONS

Defendant,

THE STATE OF WISCONSIN/COUNTY OF WAUKESHA TO SAID DEFENDANT:

A Complaint, a copy of which is attached, having been made before me accusing the defendant of committing the offenses(s) of:

THE OFFENSE(S) OF:

Second Degree Sexual Assault
Second Degree Sexual Assault

CONTRARY TO WIS. STATUTE(S):

940.225(2)(a)
940.225(2)(a)

The original of such complaint has been filed in the office of the Clerk of Courts for Waukesha County.

You, William F Kramer, are therefore summoned to appear before the Honorable Thomas J. Pieper for Waukesha County Circuit Court, at the Waukesha County Courthouse, 515 W. Moreland Boulevard, Waukesha, Wisconsin, in Room CG49 to answer the attached Complaint on:

DATE/TIME: April 14, 2014 at 8:15 AM

Posting of bail does not release the requirement of your appearance in Court. Failure to appear in Court may result in the issuance of a Warrant for your arrest.



District Attorney
State Bar No. 1011795

Dated: March 28, 2014

EXT=CODE 1

STATE OF WISCONSIN

Plaintiff,

-vs-

DA Case No.: 2014WK001850

Assigned DA/ADA: Debra L. Blasius

Agency Case No.: 14-004606

Court Case No.:

ATN: 68061000010836

William F Kramer
S39w27465 Brookhill Dr
Waukesha, WI 53189
DOB: 01/21/1965
Sex/Race: M/W
Eye Color: Brown
Hair Color: Brown
Height: 5 ft 8 in
Weight: 180 lbs
Alias:

Criminal Complaint

Defendant,

Lieutenant Detective David Constantineau, of the Muskego Police Department, being first duly sworn on oath, upon information and belief, states that:

Count 1: SECOND DEGREE SEXUAL ASSAULT

The above-named defendant on or about Friday, April 08, 2011, at the approximate location of S76 W17745 Janesville Road, in the City of Muskego, Waukesha County, Wisconsin, by use or threat of force, did have sexual contact, (breast), with D.R., without the consent of that person, contrary to sec. 940.225(2)(a), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

Count 2: SECOND DEGREE SEXUAL ASSAULT

The above-named defendant on or about Friday, April 08, 2011, at the approximate location of S76 W17745 Janesville Road, in the City of Muskego, Waukesha County, Wisconsin, by use or threat of force, did have sexual contact, (groin), with D. R., without the consent of that person, contrary to sec. 940.225(2)(a), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, 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 upon the investigative reports of Detective Stephen Westphal of the City of Muskego Police Department whom complainant believes to be truthful and reliable in this instance.

Said reports indicate that on March 5, 2014 Detective Stephen Westphal of the City of Muskego Police Department met with adult citizen D.R. who reported that she had been sexually assaulted in the Spring of 2011 or 2012, said date was later determined by email to be April 8, 2011. D.R. indicated she was employed by a Senator and was an active member of the Republican party in Waukesha.

D.R. stated she was familiar with State Representative Bill Kramer due to numerous events that occurred in Waukesha County. They attended several of the same functions on a monthly basis.

On April 8, 2011 D.R. indicates she went to a "Pints and Politics" event held at the High Tide Pub & Grill on Janesville Road in the City of Muskego. By the end of the evening, the defendant was really drunk and was sloppy, stumbling, louder and more obnoxious than usual. The defendant had asked her for a ride to another location so a friend could pick him up.

D.R. indicates that the defendant walked with her to her car on the west side of the building. The defendant placed his right arm around her shoulder and squeezed her shoulder in a hard manner and squeezed her towards him. The defendant was leaning into her which made her feel uncomfortable. Initially she thought he was joking around but D.R. tried to get away from his grip. As they neared her car, the defendant shoved her into the side of her car in a hard manner. Her back hit the car and her head also snapped back and hit the car which caused pain in her back and head. D.R. states she later had bruising on her back as a result of being shoved against the car. The defendant then leaned his body into her and pressed his weight against her. The defendant forcibly kissed her on the mouth with his tongue. The defendant put his hands up her shirt and grabbed her breasts. She told him "no and don't." D.R. states that she tried turning her head away and immediately pushed his hands down away from her. The defendant continued for what seemed like a long time and after she was successful in removing his hands from under her shirt and her breasts, the defendant took a step back. The defendant then lunged at her a second time pushing her up against the car again and kissed her placing his tongue in her mouth and grabbed her breasts under her shirt again. D.R. states she continued to tell him "no and don't" as she turned her head away from him and pushed at his hands. D.R. states she was able to push his hands away from her breast and then the defendant said "okay let's go, let's go."

D. R. states she was shocked, numb and not thinking clearly but wanted to get away from the defendant and get him to where he was going. The defendant entered her car and sat in the front passenger seat and directed her to a parking spot to the east side of the building. D.R. indicates that it turned out that the parking spot she was directed to was next to his car. The defendant immediately locked the car doors and aggressively leaned into her, crossing the center console with his body and grabbed her left shoulder in a hard manner with his right hand. The defendant stated "I want to fuck you, I wanted to for a long time, I know you want it too, I want to get in your pants, I want to touch your pussy." D.R. indicates that the defendant again forcibly kissed her on the mouth and pulled her top away from her chest trying to look at her exposed breasts. He then grabbed and touched her groin over her clothes. D.R. states she tried to move away and push his hands away but he kept leaning into her. D.R. states that she felt dirty, scared and was afraid that the defendant was going to rape her. After the defendant leaned into the back seat to pick something up she was able to send a quick text message asking friends to return to the parking lot.

D.R. states that she never spoke to the defendant about this incident and never gave him permission or consent to touch her groin or breasts. She repeatedly told him no and don't and physically tried to resist his actions but he ignored her demands and continued touching her breast, groin and forcibly kissed her throughout the incident.

D.R. indicate that she wanted the incident to go away and did not want any embarrassment for herself, her family or the Party. D.R. indicates that she contacted an attorney in Milwaukee who drafted a letter to the defendant to stay away from her. Detective Westphal indicates he was able to obtain a copy of the letter sent to the defendant on May 18, 2011 advising the defendant that the attorney had been contacted in connection "with the physical and sexual assault you perpetrated on

D.R. at the recent Pints and Politics event in Muskego. . . she wants you to understand that she has been severely impacted emotionally as a result of your actions and she wants to ensure that it not happen again to her or to another. As a result of your actions D.R. expects you will not attempt to contact her or be in her presence unless it is absolutely unavoidable. D.R. believes it is likely your assault behavior was influenced by your use of alcohol and she suggests you get treatment. Rest assured that if you persist with your sexually and or physically inappropriate behavior toward her or another she will reconsider her decision not to go to the authorities."

D.R. indicated that as a result of the defendant's actions she also sought professional help and described the assault as "a nightmare." D.R. states that she did hear about the recent allegations that had occurred involving the defendant and she did decide to go to the authorities regarding this incident. D.R. had identified a Jennifer Y. as a potential witness to the aftermath of the assault.

Detective Westphal indicates contacting Jennifer Y. who stated that she recalled the incident between the defendant and D.R. at the supper club which was the High Tide Pub & Grill. Jennifer stated that approximately three years ago she remembered being at the restaurant with the defendant and D.R. and described the defendant as "very drunk."

Jennifer recalled leaving the High Tide with a friend and then returning to the parking lot at D.R.'s request. Upon returning she recalled that D.R. appeared in a panic and was crying. D.R. told her that she did not know what to do and said that the defendant made inappropriate advances toward her including trying to kiss her and grabbed her chest area. At that time Jennifer observed the defendant standing near his car and appeared intoxicated and she told him to leave. Jennifer described D.R. as having high moral character and stated that it was obvious D.R. was visibly upset by the defendant's actions.

Detective Westphal indicates on March 19, 2014 he left a voicemail message for the defendant and requested that he contact Detective Westphal. The defendant returned his phone call but indicated that he would not be able to come in until April because he was in "therapy for these issues." Detective Westphal explained to the defendant that D.R. claimed he made inappropriate advances toward her and the defendant stated "is this the same D.R. that applied for a job in my office." Detective Westphal explained the allegations in this incident and the defendant stated he recalled being friends with D.R. up until the Pints & Politics event in Muskego and remembered being there with her. He was asked if he recalled kissing her at all that evening. The defendant responded "I recall kissing her in 2008 at the Country Springs when she stuck her tongue down my throat." The defendant then stated he did not remember anything at Pints & Politics.

The defendant was asked if he received a letter from a law firm regarding the allegations and the defendant stated he did receive a letter from a law firm about contact with D.R. but claimed "I hardly read the letter." Defendant then said "I kissed her good night maybe." Still later the defendant stated "I am sure I kissed her good night." Detective Westphal indicates that he and the defendant continued in their conversation and the defendant stated "maybe I did maybe I didn't in regard to kissing." The defendant stated as much as I remember she kissed me back. The defendant was asked if he recalled getting in the car with D.R. and he stated no. The defendant was asked if he touched her breasts and the defendant responded "I am sure I put my hands somewhere, I do not know where." The defendant was asked multiple times about touching D.R.'s breasts and he responded with different answers including "I don't remember doing that and I am saying it did not happen." The defendant then stated "D.R. has very nice doctor enhanced breasts. I am not a big fan of those I like the real ones." The defendant stated "I do not have any incentive to put my hands on her breasts." The defendant was asked about being in her car and he stated "it is possible, but I don't

remember that happening." The defendant was asked if D.R. ever told him no or backed him away and the defendant replied "I am sure she said something about it not going any further, that is why I went home. I am sure that happened but I don't remember it. I have been turned down a lot." The defendant stated I may have made a pass at her I think she was divorced by then.

Detective Westphal indicates re-contacting D.R. who denied ever kissing the defendant at any event in 2008 and stated she had contacted the defendant's Chief of Staff regarding a job posting but she had no intention of working specifically for the defendant.

Detective Westphal also met with Keith Best who stated that the situation was very difficult for him because he had been friends with both D.R. and the defendant for several years. Best stated he was currently the first Vice Chairman of the Republican Party in Waukesha County. Best stated he recalled the incident and he was the person responsible for setting up the Pints & Politics events. He replied that D.R. was extremely upset and distraught following the incident and this is why the incident stuck with him. Following the event he and several other people decided to go to a restaurant in Muskego. He observed D.R. and the defendant walk out of the banquet hall and did not find that unusual as they were friends. He believed D.R. was going to give the defendant a ride because the defendant was obviously intoxicated to the point he should not be driving. Best stated that after he arrived at the other restaurant either he or his acquaintance received a call from D.R. who was distraught and in need of assistance. He started back to the High Tide to assist D.R. When they subsequently spoke to D.R. she told him that the defendant had accosted her. Best stated he could not recall the specific allegation other than the defendant got physical with her and put his hands where they did not belong. Best stated that he interpreted that the defendant did something sexual in nature. He did remember D.R. was extremely upset and flustered over the incident. Best stated he never spoke to the defendant about the incident and noted D.R. was still upset about the incident several days later but she never spoke about it again. Best was under the impression that D.R. did not want the incident publicized because she did not want to embarrass the Party or the defendant. Best acknowledged he had seen Kramer drink too much on other occasions and make inappropriate comments but had not seen him get physical before.

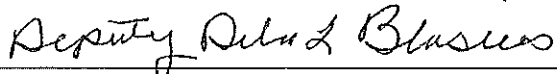
Based on the foregoing, the complainant believes this complaint to be true and correct.



Complainant

Subscribed and sworn to before me,
and approved for filing on:

this 28 day of March, 2014



Assistant/Deputy/District Attorney

State Bar # 1002731

DLB/dsg

EXT=CODE 1