

**FILED**  
**02-10-2025**  
**Anna Maria Hodges**  
**Clerk of Circuit Court**  
**2025CF000717**  
**Honorable Michelle A.**  
**Havas-10**  
**Branch 10**

**STATE OF WISCONSIN                      CIRCUIT COURT                      MILWAUKEE COUNTY**

**STATE OF WISCONSIN**  
**Plaintiff,**

**DA Case No.: 2024ML028763**  
**Court Case No.:**

vs.

**CRIMINAL COMPLAINT**

CHANDLER, JAKYA D  
4903 NORTH 85TH STREET  
MILWAUKEE, WI 53225  
DOB: 12/28/1999

CHANDLER, JILNYA L  
5188 NORTH LOVERS LANE ROAD  
#12  
MILWAUKEE, WI 53225  
DOB: 02/28/1999

**Defendant(s).**

*For Official Use*

THE BELOW NAMED COMPLAINANT BEING DULY SWORN, ON INFORMATION AND BELIEF STATES THAT:

**Count 1: PHYSICAL ABUSE OF A CHILD, REPEATED ACTS CAUSING BODILY HARM - PTAC, AS A PARTY TO A CRIME, SEXUAL ASSAULT OF A CHILD / PHYSICAL ABUSE OF A CHILD BY A CHILD CARE PROVIDER (As to defendant Jakya D Chandler)**

The above-named defendant Between September 18, 2024, and November 8, 2024, at 8647 North Port Washington Road #2, in the Village of Fox Point, Milwaukee County, Wisconsin, as a party to a crime, did commit repeated acts of physical abuse involving the same child, ACT, DOB 02/27/2023, where at least three of the acts were violations of sec. 948.03(2), sec. 948.03(3), or sec. 948.03(4) of Wis. Stats., contrary to sec. 948.03(5)(a)5, 939.50(3)(e), 939.05, 939.635 Wis. Stats.

Upon conviction for this offense, a Class E Felony, the defendants may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than fifteen (15) years, or both.

And further, invoking the provisions of sec. 939.635 Wis. Stats., because the defendant was providing child care for compensation for ACT, DOB 02/27/2023, the child who is the victim of the violation, the maximum term of imprisonment may be increased by not more than five (5) years.

**Count 2: PHYSICAL ABUSE OF A CHILD, REPEATED ACTS CAUSING BODILY HARM - PTAC, AS A PARTY TO A CRIME, SEXUAL ASSAULT OF A CHILD / PHYSICAL ABUSE OF A CHILD BY A CHILD CARE PROVIDER (As to defendant Jilnya L Chandler)**

The above-named defendant Between September 18, 2024, and November 8, 2024, at 8647 North Port Washington Road #2, in the Village of Fox Point, Milwaukee County, Wisconsin, as a party to a crime, did commit repeated acts of physical abuse involving the same child, ACT, DOB 02/27/2023, where at least three of the acts were violations of sec. 948.03(2), sec. 948.03(3), or sec. 948.03(4) of Wis. Stats., contrary to sec. 948.03(5)(a)5, 939.50(3)(e), 939.05, 939.635 Wis. Stats.

Upon conviction for this offense, a Class E Felony, the defendants may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than fifteen (15) years, or both.

And further, invoking the provisions of sec. 939.635 Wis. Stats., because the defendant was providing child care for compensation for ACT, DOB 02/27/2023, the child who is the victim of the violation, the maximum term of imprisonment may be increased by not more than five (5) years.

**Count 3: PHYSICAL ABUSE OF A CHILD, REPEATED ACTS CAUSING BODILY HARM - PTAC, AS A PARTY TO A CRIME, SEXUAL ASSAULT OF A CHILD / PHYSICAL ABUSE OF A CHILD BY A CHILD CARE PROVIDER** (As to defendant Jakya D Chandler)

The above-named defendant Between September 18, 2024, and November 8, 2024, at 8647 North Port Washington Road #2, in the Village of Fox Point, Milwaukee County, Wisconsin, as a party to a crime, did commit repeated acts of physical abuse involving the same child, AEO, DOB 03/01/2023, where at least three of the acts were violations of sec. 948.03(2), sec. 948.03(3), or sec. 948.03(4) of Wis. Stats., contrary to sec. 948.03(5)(a)5, 939.50(3)(e), 939.05, 939.635 Wis. Stats.

Upon conviction for this offense, a Class E Felony, the defendants may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than fifteen (15) years, or both.

And further, invoking the provisions of sec. 939.635 Wis. Stats., because the defendant was providing child care for compensation for AEO, DOB 03/01/2023, the child who is the victim of the violation, the maximum term of imprisonment may be increased by not more than five (5) years.

**Count 4: PHYSICAL ABUSE OF A CHILD, REPEATED ACTS CAUSING BODILY HARM - PTAC, AS A PARTY TO A CRIME, SEXUAL ASSAULT OF A CHILD / PHYSICAL ABUSE OF A CHILD BY A CHILD CARE PROVIDER** (As to defendant Jilnya L Chandler)

The above-named defendant Between September 18, 2024, and November 8, 2024, at 8647 North Port Washington Road #2, in the Village of Fox Point, Milwaukee County, Wisconsin, as a party to a crime, did commit repeated acts of physical abuse involving the same child, AEO, DOB 03/01/2023, where at least three of the acts were violations of sec. 948.03(2), sec. 948.03(3), or sec. 948.03(4) of Wis. Stats., contrary to sec. 948.03(5)(a)5, 939.50(3)(e), 939.05, 939.635 Wis. Stats.

Upon conviction for this offense, a Class E Felony, the defendants may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than fifteen (15) years, or both.

And further, invoking the provisions of sec. 939.635 Wis. Stats., because the defendant was providing child care for compensation for AEO, DOB 03/01/2023, the child who is the victim of the violation, the maximum term of imprisonment may be increased by not more than five (5) years.

**Count 5: PHYSICAL ABUSE OF A CHILD, REPEATED ACTS CAUSING BODILY HARM - PTAC, AS A PARTY TO A CRIME, SEXUAL ASSAULT OF A CHILD / PHYSICAL ABUSE OF A CHILD BY A CHILD CARE PROVIDER** (As to defendant Jakya D Chandler)

The above-named defendant Between September 18, 2024, and November 8, 2024, at 8647 North Port Washington Road #2, in the Village of Fox Point, Milwaukee County, Wisconsin, as a party to a crime, did commit repeated acts of physical abuse involving the same child, BOA, DOB 07/01/2023, where at least three of the acts were violations of sec. 948.03(2), sec. 948.03(3), or sec. 948.03(4) of Wis. Stats., contrary to sec. 948.03(5)(a)5, 939.50(3)(e), 939.05, 939.635 Wis. Stats.

Upon conviction for this offense, a Class E Felony, the defendants may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than fifteen (15) years, or both.

And further, invoking the provisions of sec. 939.635 Wis. Stats., because the defendant was providing child care for compensation for BOA, DOB 07/01/2023, the child who is the victim of the violation, the maximum term of imprisonment may be increased by not more than five (5) years.

**Count 6: PHYSICAL ABUSE OF A CHILD, REPEATED ACTS CAUSING BODILY HARM - PTAC, AS A PARTY TO A CRIME, SEXUAL ASSAULT OF A CHILD / PHYSICAL ABUSE OF A CHILD BY A CHILD CARE PROVIDER** (As to defendant Jilnya L Chandler)

The above-named defendant Between September 18, 2024, and November 8, 2024, at 8647 North Port Washington Road #2, in the Village of Fox Point, Milwaukee County, Wisconsin, as a party to a crime, did commit repeated acts of physical abuse involving the same child, BOA, DOB 07/01/2023, where at least three of the acts were violations of sec. 948.03(2), sec. 948.03(3), or sec. 948.03(4) of Wis. Stats., contrary to sec. 948.03(5)(a)5, 939.50(3)(e), 939.05, 939.635 Wis. Stats.

Upon conviction for this offense, a Class E Felony, the defendants may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than fifteen (15) years, or both.

And further, invoking the provisions of sec. 939.635 Wis. Stats., because the defendant was providing child care for compensation for BOA, DOB 07/01/2023, the child who is the victim of the violation, the maximum term of imprisonment may be increased by not more than five (5) years.

**Count 7: PHYSICAL ABUSE OF A CHILD, REPEATED ACTS CAUSING BODILY HARM - PTAC, AS A PARTY TO A CRIME, SEXUAL ASSAULT OF A CHILD / PHYSICAL ABUSE OF A CHILD BY A CHILD CARE PROVIDER** (As to defendant Jakya D Chandler)

The above-named defendant Between September 18, 2024, and November 8, 2024, at 8647 North Port Washington Road #2, in the Village of Fox Point, Milwaukee County, Wisconsin, as a party to a crime, did commit repeated acts of physical abuse involving the same child, JKK, DOB 03/18/2023, where at least three of the acts were violations of sec. 948.03(2), sec. 948.03(3), or sec. 948.03(4) of Wis. Stats., contrary to sec. 948.03(5)(a)5, 939.50(3)(e), 939.05, 939.635 Wis. Stats.

Upon conviction for this offense, a Class E Felony, the defendants may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than fifteen (15) years, or both.

And further, invoking the provisions of sec. 939.635 Wis. Stats., because the defendant was providing child care for compensation for JKK, DOB 03/18/2023, the child who is the victim of the violation, the maximum term of imprisonment may be increased by not more than five (5) years.

**Count 8: PHYSICAL ABUSE OF A CHILD, REPEATED ACTS CAUSING BODILY HARM - PTAC, AS A PARTY TO A CRIME, SEXUAL ASSAULT OF A CHILD / PHYSICAL ABUSE OF A CHILD BY A CHILD CARE PROVIDER** (As to defendant Jilnya L Chandler)

The above-named defendant Between September 18, 2024, and November 8, 2024, at 8647 North Port Washington Road #2, in the Village of Fox Point, Milwaukee County, Wisconsin, as a party to a crime, did commit repeated acts of physical abuse involving the same child, JKK, DOB 03/18/2023, where at least three of the acts were violations of sec. 948.03(2), sec. 948.03(3), or sec. 948.03(4) of Wis. Stats., contrary to sec. 948.03(5)(a)5, 939.50(3)(e), 939.05, 939.635 Wis. Stats.

Upon conviction for this offense, a Class E Felony, the defendants may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than fifteen (15) years, or both.

And further, invoking the provisions of sec. 939.635 Wis. Stats., because the defendant was providing child care for compensation for JKK, DOB 03/18/2023, the child who is the victim of the violation, the maximum term of imprisonment may be increased by not more than five (5) years.

**Count 9: PHYSICAL ABUSE OF A CHILD, REPEATED ACTS CAUSING BODILY HARM - PTAC, AS A PARTY TO A CRIME, SEXUAL ASSAULT OF A CHILD / PHYSICAL ABUSE OF A CHILD BY A CHILD CARE PROVIDER** (As to defendant Jakya D Chandler)

The above-named defendant Between September 18, 2024, and November 8, 2024, at 8647 North Port Washington Road #2, in the Village of Fox Point, Milwaukee County, Wisconsin, as a party to a crime, did commit repeated acts of physical abuse involving the same child, HD, DOB 09/07/2023, where at least three of the acts were violations of sec. 948.03(2), sec. 948.03(3), or sec. 948.03(4) of Wis. Stats., contrary to sec. 948.03(5)(a)5, 939.50(3)(e), 939.05, 939.635 Wis. Stats.

Upon conviction for this offense, a Class E Felony, the defendants may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than fifteen (15) years, or both.

And further, invoking the provisions of sec. 939.635 Wis. Stats., because the defendant was providing child care for compensation for HD, DOB 09/07/2023, the child who is the victim of the violation, the maximum term of imprisonment may be increased by not more than five (5) years.

**Count 10: PHYSICAL ABUSE OF A CHILD, REPEATED ACTS CAUSING BODILY HARM - PTAC, AS A PARTY TO A CRIME, SEXUAL ASSAULT OF A CHILD / PHYSICAL ABUSE OF A CHILD BY A CHILD CARE PROVIDER** (As to defendant Jilnya L Chandler)

The above-named defendant Between September 18, 2024, and November 8, 2024, at 8647 North Port Washington Road #2, in the Village of Fox Point, Milwaukee County, Wisconsin, as a party to a crime, did commit repeated acts of physical abuse involving the same child, HED-H, DOB 09/07/2023, where at least three of the acts were violations of sec. 948.03(2), sec. 948.03(3), or sec. 948.03(4) of Wis. Stats., contrary to sec. 948.03(5)(a)5, 939.50(3)(e), 939.05, 939.635 Wis. Stats.

Upon conviction for this offense, a Class E Felony, the defendants may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than fifteen (15) years, or both.

And further, invoking the provisions of sec. 939.635 Wis. Stats., because the defendant was providing child care for compensation for HED-H, DOB 09/07/2023, the child who is the victim of the violation, the maximum term of imprisonment may be increased by not more than five (5) years.

**Count 11: PHYSICAL ABUSE OF A CHILD (RECKLESS CAUSATION OF BODILY HARM) - PTAC, AS A PARTY TO A CRIME, SEXUAL ASSAULT OF A CHILD / PHYSICAL ABUSE OF A CHILD BY A CHILD CARE PROVIDER** (As to defendant Jakya D Chandler)

The above-named defendant Between September 18, 2024, and November 8, 2024, at 8647 North Port Washington Road #2, in the Village of Fox Point, Milwaukee County, Wisconsin, as a party to a crime, did recklessly cause bodily harm to AI, DOB 05/22/2023, a child, contrary to sec. 948.03(3)(b), 939.50(3)(i), 939.05, 939.635 Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendants 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.

And further, invoking the provisions of sec. 939.635 Wis. Stats., because the defendant was providing child care for compensation for AI, DOB 05/22/2023, the child who is the victim of the violation, the maximum term of imprisonment may be increased by not more than five (5) years.

**Count 12: PHYSICAL ABUSE OF A CHILD (RECKLESS CAUSATION OF BODILY HARM) - PTAC, AS A PARTY TO A CRIME, SEXUAL ASSAULT OF A CHILD / PHYSICAL ABUSE OF A CHILD BY A CHILD CARE PROVIDER** (As to defendant Jilnya L Chandler)

The above-named defendant Between September 18, 2024, and November 8, 2024, at 8647 North Port Washington Road #2, in the Village of Fox Point, Milwaukee County, Wisconsin, as a party to a crime, did recklessly cause bodily harm to AI, DOB 05/22/2023, a child, contrary to sec. 948.03(3)(b), 939.50(3)(i), 939.05, 939.635 Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendants 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.

And further, invoking the provisions of sec. 939.635 Wis. Stats., because the defendant was providing child care for compensation for AI, DOB 05/22/2023, the child who is the victim of the violation, the maximum term of imprisonment may be increased by not more than five (5) years.

**Count 13: PHYSICAL ABUSE OF A CHILD (RECKLESS CAUSATION OF BODILY HARM) - PTAC, AS A PARTY TO A CRIME, SEXUAL ASSAULT OF A CHILD / PHYSICAL ABUSE OF A CHILD BY A CHILD CARE PROVIDER** (As to defendant Jakya D Chandler)

The above-named defendant Between September 18, 2024, and November 8, 2024, at 8647 North Port Washington Road #2, in the Village of Fox Point, Milwaukee County, Wisconsin, as a party to a crime, did recklessly cause bodily harm to RJ, DOB 11/18/2022, a child, contrary to sec. 948.03(3)(b), 939.50(3)(i), 939.05, 939.635 Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendants 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.

And further, invoking the provisions of sec. 939.635 Wis. Stats., because the defendant was providing child care for compensation for RJ, DOB 11/18/2022, the child who is the victim of the violation, the maximum term of imprisonment may be increased by not more than five (5) years.

**Count 14: PHYSICAL ABUSE OF A CHILD (RECKLESS CAUSATION OF BODILY HARM) - PTAC, AS A PARTY TO A CRIME, SEXUAL ASSAULT OF A CHILD / PHYSICAL ABUSE OF A CHILD BY A CHILD CARE PROVIDER** (As to defendant Jilnya L Chandler)

The above-named defendant Between September 18, 2024, and November 8, 2024, at 8647 North Port Washington Road #2, in the Village of Fox Point, Milwaukee County, Wisconsin, as a party to a crime, did recklessly cause bodily harm to RJ, DOB 11/18/2022, a child, contrary to sec. 948.03(3)(b), 939.50(3)(i), 939.05, 939.635 Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendants 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.

And further, invoking the provisions of sec. 939.635 Wis. Stats., because the defendant was providing child care for compensation for RJ, DOB 11/18/2022, the child who is the victim of the violation, the maximum term of imprisonment may be increased by not more than five (5) years.

**Count 15: PHYSICAL ABUSE OF A CHILD, REPEATED ACTS CAUSING BODILY HARM - PTAC, AS A PARTY TO A CRIME, SEXUAL ASSAULT OF A CHILD / PHYSICAL ABUSE OF A CHILD BY A CHILD CARE PROVIDER (As to defendant Jakya D Chandler)**

The above-named defendant Between September 18, 2024, and November 8, 2024, at 8647 North Port Washington Road #2, in the Village of Fox Point, Milwaukee County, Wisconsin, as a party to a crime, did commit repeated acts of physical abuse involving the same child, TO, DOB 06/01/2023, where at least three of the acts were violations of sec. 948.03(2), sec. 948.03(3), or sec. 948.03(4) of Wis. Stats., contrary to sec. 948.03(5)(a)5, 939.50(3)(e), 939.05, 939.635 Wis. Stats.

Upon conviction for this offense, a Class E Felony, the defendants may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than fifteen (15) years, or both.

And further, invoking the provisions of sec. 939.635 Wis. Stats., because the defendant was providing child care for compensation for TO, DOB 06/01/2023, the child who is the victim of the violation, the maximum term of imprisonment may be increased by not more than five (5) years.

**Count 16: PHYSICAL ABUSE OF A CHILD, REPEATED ACTS CAUSING BODILY HARM - PTAC, AS A PARTY TO A CRIME, SEXUAL ASSAULT OF A CHILD / PHYSICAL ABUSE OF A CHILD BY A CHILD CARE PROVIDER (As to defendant Jilnya L Chandler)**

The above-named defendant Between September 18, 2024, and November 8, 2024, at 8647 North Port Washington Road #2, in the Village of Fox Point, Milwaukee County, Wisconsin, as a party to a crime, did commit repeated acts of physical abuse involving the same child, TO, DOB 06/01/2023, where at least three of the acts were violations of sec. 948.03(2), sec. 948.03(3), or sec. 948.03(4) of Wis. Stats., contrary to sec. 948.03(5)(a)5, 939.50(3)(e), 939.05, 939.635 Wis. Stats.

Upon conviction for this offense, a Class E Felony, the defendants may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than fifteen (15) years, or both.

And further, invoking the provisions of sec. 939.635 Wis. Stats., because the defendant was providing child care for compensation for TO, DOB 06/01/2023, the child who is the victim of the violation, the maximum term of imprisonment may be increased by not more than five (5) years.

**Probable Cause:**

Complainant is an employee of Fox Point Police Department and bases this complaint on information and belief and on a review of official police reports prepared by Fox Point Police Officers which are the kind Complainant has used in the past and found to be truthful and reliable and which Complainant knows were prepared in the ordinary and regular course of police business.

**As to Counts 1 and 2:**

On November 8, 2024, Officers were dispatched to Children's Hospital regarding a child having bruises on his body. Officers made phone contact with the mother of the child, MJT, who stated that they were discharged from the hospital and enroute to their residence. Officers responded to MJT's residence.

Upon arrival, Officers made contact with MJT. MJT stated that her son, ACT (Date of Birth: 02/27/2023) started daycare at the Nurturing Nook, located at 8647 N. Port Washington Road, #2, Village of Fox Point, Milwaukee County, on October 29, 2024. MJT stated that ACT attends every Tuesday and Thursday. MJT stated that when she picked ACT up from daycare on October 31, 2024, a teacher informed her that ACT had scratched himself under his left eye, and upon returning home, she noticed redness on his left ear. MCT stated that on November 7, 2024, she picked ACT up from daycare at 4:00 p.m. and observed that he had bruising on his left ear. MJT stated that after observing this bruising, she

checked the rest of ACT's body, whereupon she observed redness under his arms. MJT stated that while she was getting ACT ready for bed, she noticed what she described as a "petechial bruise" to his left inner leg, as well as an additional red spot on top of ACT's right ear, and a red mark or bruising on the left side of his neck. MJT stated that she contacted ACT's teachers at Nurturing Nook and asked if anything had happened that day. MJT stated that the teachers told her they did not notice anything specific and were apologetic that they could not provide her with more information. MJT stated that ACT's teachers were the above-referenced defendant Jakya Chandler (hereinafter referred to as "Jakya") and the above-referenced defendant Jilnya Chandler (hereinafter referred to as "Jilnya.")

Officers interviewed ACT's father, AT, who stated that he dropped ACT off at his first day of daycare, and he did "fine" but the next day, when he pulled into the parking lot, ACT started crying.

On November 8, 2024, ACT was evaluated by APNP Kristin Alinea Petska of Children's Hospital. Upon evaluating ACT, NP Petska observed that ACT had the following injuries:

- Red curvilinear petechial bruise to the left neck;
- Faint, red petechial bruises to the right posterior neck/upper back;
- Red bruise to the posterior helix of the right ear;
- Red bruise to the antihelix of the right ear;
- Multiple red bruises to the antihelix of the left ear;
- Red bruise to the posterior helix to the left ear;
- Red/hyperpigmented raised dry skin below the left armpit;
- Faint, non-blanching macules to the left posterior shoulder/upper back and inner/posterior left thigh, concerning for possible bruising;
- A brown/yellow bruise to the left forehead.

Of note, NP Petska noted that ACT had bruising over areas of his body that are less likely to be bruised by accident, including his neck and ears. NP Petska indicated: "Bruising to the ears is usually caused by blunt force impact to the ear (e.g. a punch or slap) or by direct pulling on/pinching of the ear. Ear bruising is rarely caused by accidental means in childhood, and is not expected during the typical care, handling, or activity of a healthy child. The neck is considered a "protected" area, an area of the body that is protected by other body structures or bony prominences. The bruising in this case also appears patterned. No history of trauma was initially provided to explain these injuries. Investigators subsequently reviewed video footage that showed daycare providers pinching Arjun's ears and hitting and kicking him. Overall, his presentation is consistent with inflicted trauma and child physical abuse. The described behavior in no way represents appropriate care or handling of a young child and placed him at increased risk for serious injury, up to and including death."

On November 11, 2024, Officers responded to Nurturing Nook, and spoke with the director, LL. LL stated that there is surveillance footage available from ACT's classroom from November 5 and November 7. LL stated that the teachers assigned to ACT's classroom on November 5 and November 7 were Jilnya and Jakya.

On November 11, 2024, Officers interviewed Jilnya. Jilnya stated that she began her employment with the Nurturing Nook on September 18, 2024. She stated that ACT has extreme temper tantrums, which consists of him falling on the floor while crying and banging on the door with his hands. When asked how she handles the temper tantrums, Jilnya stated that she will sometimes pick ACT up, or distract him with books or toys. Jilnya indicated she did not know how ACT obtained the bruise on his ear, and

speculated that he ran into something and hurt himself. Jilnya indicated that Officers would not locate anything of concern on the surveillance footage.

On November 11, 2024, Officers interviewed Jakya. Jakya stated that she began her employment on September 16, 2024. Jakya stated that she did not know how ACT obtained the bruise on his ear. Jakya stated that Officers would not located anything of concern on the surveillance footage.

On November 14, 2024, Officers interviewed LL again, who stated that she reviewed surveillance video from November 7, 2024, and observed multiple violations of policy by Jakya and Jilyna. LL sated that both Jilnya and Jakya were suspended while an ongoing internal investigation was being conducted. LL agreed to provide all available surveillance footage from Jilyna and Jakya's classroom, but indicated that the saved footage only goes back approximately 30 days. Upon receiving surveillance footage<sup>1</sup>, Officers began to review it.

### **Surveillance footage as it pertains to the treatment of ACT:**

**10/29/24** CH08-20241029-112037-120254

12:00:13 Jilnya grabs ACT by his left arm and walks him to his cot. She places ACT face down and then clearly pushes ACT's head into the cot while saying "Lay down." ACT begins to cry. Jilnya then places a blanket over his entire body and head and aggressively pushes his head down into the cot again.

**10/31/24** CH08-20241031-094839-103056

09:52:25 Jakya sits down next to ACT, who is laying on the floor screaming and crying, and tells him to, "Fucking shut up."

**10/31/24** CH08-20241031-141556-151532

15:15:02 Jilnya picks up ACT by grabbing one of his arms, she lifts him up from laying down with his one arm extended over his head and his entire body weight being supported by the one arm. ACT briefly cries before being put on the changing table.

**11/05/24** CH08-20241105-081710-085929

8:33:21 ACT is sitting on the floor crying for "mama." Jakya turns to him and says, "[ACT], we're not going to do that, we're not going to do that, (inaudible)."

8:35:29 ACT continues to cry; Jakya tells him to stop crying and screaming. Jakya then walks ACT over near a bookshelf and has him lay face down.

8:37:05 Jakya picks ACT up and says it's time to eat breakfast and tells him not to scream. ACT continues to cry. Jakya walks him to the other side of the room, behind the bookshelf, and has ACT lay face down on a pillow.

9:27:46 Jakya gets up from circle time and walks to where ACT is laying behind the bookshelf. Jakya puts one arm out of view in the direction of ACT while she yells, "Stop, all done. Now. Be quiet. Be quiet."

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<sup>11</sup> The following surveillance footage descriptions is not an exhaustive list of all of the surveillance footage obtained and reviewed. Investigators noted that there are many additional surveillance videos depicting concerning treatment of the children under the defendant's care.



9:30:31 ACT continues to cry. Jakya gets up, kneels down where ACT is lying, concealed by the bookshelf. Jakya takes ACT's lovey blanket and then put both hands out of view, behind the bookshelf. ACT crying is temporarily muffled and then a high pitch scream is heard. ACT continues to cry and scream behind the bookshelf.

**11/05/24** CH08-20241105-094146-102403

9:57:51 Jakya puts ACT down from the changing table and he begins crying for "Mama."

9:58:40 ACT walks to the door and cries for "Mama." Jakya walks over and takes ACT's left hand and walks him to the chair by the bookshelf and says "have a seat." ACT continues to cry. Jilnya walks over to him, leans down to his face and yells, "All done, that's enough, all done, no, no." ACT sits quietly.

9:59:24 ACT begins crying again and Jilnya yells, "All done, [ACT]. No. No" as ACT cries for "Mama."

10:00:03 Jilnya yells at ACT, "All done [ACT], no all done." Jakya states, "He's getting louder and louder." Jilnya glances at ACT and then gets up and walks over to him.

10:00:31 Jilnya leans down and grabs ACT by the left arm. Her body is partially blocking ACT but you can see his body move from the force. He is then in a standing position while Jilnya yells in his face, "be quiet, that's enough. All done." ACT goes quiet. As Jilnya begins to walk away, ACT cries for "mama." Jilnya turns around and says, "shut the fuck up." Jilnya then takes a step towards ACT, and her body is blocking view of her right arm. ACT's head jerks to the left and he begins to scream louder. Jilnya yells, "all done." ACT cowers and continues to cry. **Based on Jilnya's body position and ACT's response to Jilnya's action, it appears Jilnya pinched ACT's ear.**

10:02:24 ACT continues to cry in the chair for "mama." Jakya walks near him and says, "be quiet, shut up." Jakya then grabs ACT by the arms and carries him to the back of the bookshelf where he is concealed from view of the camera. She moves AEO over by grabbing her arm and then lays ACT on the ground while he screams.

**11/07/2024** CH08-20241107-080704-084921

08:28:52-ACT is screaming louder and Jilnya leans over and appears to make forceful contact with ACT, sits back and again leans forward and appears to make two hitting motions with her left hand where ACT is sitting.

08:33:14-Jilnya and Jakya appear to be quietly speaking toward each other. Jilnya makes a gesture with both hands like claws toward Jakya, and Jakya in turn gestures to her neck and says "A little on his neck." Jakya appears to say "Really?" Jilnya and Jakya continue to converse, but what is said cannot be heard clearly.

**11/07/2024** CH08-20241107-140948-145610

14:25:56- AW is running around the room where the children are trying to nap and she comes over to Jilnya still on the floor near ACT and is making noise with a cookie bag. ACT moves and whimpers, Jilnya says to ACT, "all done." Jilnya raises her voice toward ACT, readjusts the blanket, pushes the blanket down, and appears to hit ACT near his head area with her left hand. ACT begins to cry and Jilnya repeatedly says "Lay down" to ACT and appears to push his head and body down. ACT begins to cry harder and three times Jilnya appears to push ACT's head area down to the cot, which is still covered with the blanket. Jilnya leans her upper body with both arms in ACT's direction, but it is unclear

how or where Jilnya is touching ACT due to her body blocking the camera's view. ACT is continuously crying, calling "Mama, Mama." Jakya walks over to ACT's cot and readjusts the blanket over him. ACT continues to cry and moves his legs and Jilnya aggressively straightens his legs out.

14:31:55-ACT continues to cry and Jakya pulls the blanket back, makes the blanket tight and tucks the blanket over ACT's face under the legs of the cot, muffling ACT's crying.

**11/07/2024** CH08-20241107-145610-153827

14:58:10-Jilnya lifts ACT off the cot by his left arm with one hand and puts him on the changing table. Jakya walks over to the changing area and both appear to be looking at ACT's head area. Jakya opens the window shade to provide light and they again look at ACT. Jilnya rolls ACT over onto his stomach, and they both again look. It appears they are looking at ACT's body and speaking quietly, but what is said can't be heard.

**11/07/2024** CH08-20241107-153827-160350

15:43:26-Jakya lays down on her stomach next to ACT, who is sitting behind the bookshelf out of view of the camera, except for the back of his head. It appears that Jakya looks at and rubs ACT's right ear and then stands him up and turns his head and looks at his ear again. Jilnya says "I don't see no red mark on him." Jakya holds ACT away and looks at his left ear. Jilnya says "bring him here." Jakya picks ACT up and walks over to where Jilnya is sitting and holds him so Jilnya can see a view of his right side. Jakya asks if Jilnya can see something while she touches ACT on the right side of his neck, but it is unclear what she asks. Jakya starts to walk away with ACT, but then returns to Jilnya and appears to examine his head, neck and ear area. Both women converse with each other, but what is said cannot be heard due to the background noise. Jakya sits down across the room with ACT on her lap and she continues to look at his ears and speak with Jilnya. The complete conversation cannot be heard but at one point Jakya asks if it's "a bruise or red?"

**11/08/2024**

08:07:30-Another employee (white female with long hair and glasses) brings a phone to Jilnya and Jakya and motions to her ear. It appears that ACT's mother is on the other end of the phone line. Jilnya takes the phone and is heard stating "Oh it's on his ear, no, he did not fall. Umm he, didn't cry or anything, and I wasn't aware of it." The phone conversation continues and Jilnya states "He was kind of itchy and he had his jacket on for quite a bit yesterday and we took it off of him, but it was a little red around his neck, that's why we took it off." The conversation continues and Jilnya states "Really? He could of bumped a shelf, I'm not really sure when it happened, but he could have hit it on the shelf. When he is here he is not really interacting with the other kids, so we don't have pictures. I'm not quite sure what is going on with him. We definitely do an injury report, but I didn't, he didn't fall or anything. He don't take a nap, so what we do is we just lay him on his cot with his favorite books and his truck, and we let him lay there with his pacifier. I'm sorry about that, because I didn't know and didn't see." "I didn't see his arms, I did see his neck, but I thought it was from the jacket. When some of the kids come in, sometimes their necks are red from having their jackets all the way up or whatever, so that's what I noticed and I took the jacket off. And yesterday I thought he had a good day, so I don't, I'm shocked about what's going on with him." "I'm sorry about that, we watch these kids, but sometimes it happens really fast, he didn't cry or anything. He'll stand by the door and call "Mommy" and we get him back to the table, but we didn't hear anything like knocking or he hit anything. Like yesterday he was

acting happy and has been way better than the last couple days. He would throw his body down, it wasn't severe, but once we...[inaudible], he was fine, everything was fine. But I apologize for that cause we could pay more attention, cause I don't really know what happened to the ear, Ok, you're welcome."

08:22:28-The employee returns to the classroom and asks Jilnya "Is everything ok with [ACT]'s Mom?" Jilnya responds back about marks on his arms and ears, but due to the background noise, what is said is inaudible.

#### **As to Counts 3 and 4:**

On November 18, 2024, Officers interviewed AEO's (Date of Birth: 03/01/2023) mother, NEO. NEO stated that AEO was enrolled at Nurturing Nook since beginning of May 2023 and has been in the Teddies Classroom since February or March of 2024. NEO stated that AEO attends daycare every day but Thursdays. NEO stated that Jilnya and Jakya started in the classroom mid September 2024. NEO stated that she has observed that when she is picking AEO up at the end of the day, AEO runs up to her and does not want to stay in the room any longer than she needs to. NEO stated that she has observed since the end of summer, AEO has become very clingy with her at home, and cries every time NEO puts AEO down. NEO stated that approximately one month prior to the interview, she observed a strange mark on the backside of AEO's left arm, near her armpit, that looked like a rug burn. NEO stated that she had no explanation for what caused that mark to AEO's arm. NEO was also able to provide photos of a bruise she observed on AEO's head on October 18, 2024, and a photo of a bruise she observed on AEO's head on October 26, 2024.

#### **Surveillance footage as it pertains to the treatment of AEO**

**10/29/2024** CH08-20241029-103820-112037

11:16:18 Jilnya picks AEO up by her arms from a seated position. As she sets AEO down to walk, AEO does not put her feet down. Jilnya lets go of AEO's right arm having her hang by her left arm. Jilnya transitions AEO from her left arm to her right arm by holding AEO's elbow. Jakya is standing directly in front of them and witnesses this. Jilnya sets AEO down for her to walk and she again does not place her feet down. She says, "stand up." AEO puts her feet down. **All of AEO's body weight appeared to be supported by her right arm during the transfer from left arm to right arm.**

11:16:26 Jilnya says something (inaudible) and Jakya replies, "that's your girl though." Jilnya replies, "[AEO]'s not." Jilnya aggressively puts AEO on the changing table and pulls her pants down. AEO begins to cry and Jilnya yells, "All done." AEO continues to cry. Jilnya sets AEO down and she walks to a chair and leans into the chair to cry. Jilnya picks AEO up by one arm and sets her into the chair. Jilnya then uses her foot three times to push the chair into the table. AEO continues to cry.

**10/29/2024** CH08-20241029-112037-120254

11:23:40 AEO has her book in her lap. Jakya walks over to her and scolds her for not keeping it on the table. AEO is not crying. Jakya is blocking AEO from view. Jakya uses two hands to open the book. Her left hand is then concealed while she only uses one hand to arrange the books. Jakya is saying "Yeah, yeah cry me a river." Jakya's left hand is directly where AEO's ear would be. AEO begins crying/screaming and Jakya walks away saying, "Yeah, yeah. yeah. yeah. yeah." This is in front of ACT, HED-H, AI, BA, and JK. AEO continues to cry and Jakya says, "All done AEO. All done. All done. All done. All done. All done. All done." Jakya walks over and pokes AEO's shoulder and says, "All done, stop screaming. Stop."

**11/05/2024** CH08-20241105-141312-151742

15:10:06 Jilnya calls AEO to get her diaper changed. AEO walks to Jilnya with her lovey. JK yells to AEO and Jilnya tells JK to lay down. Jilnya rips AEO's lovey away and throws it on the cot. AEO does not start crying. Jilnya picks AEO by both her shoulders and aggressively puts her on the changing table, throwing her legs down. Jilnya aggressively grabs AEO's thigh as she is throwing AEO's legs down. While she is doing this she says "girl, will you stop?" AEO immediately begins crying and screaming. Jilnya tells Jakya "Did you see her she was like falling out?" Jilnya grabs AEO and while she's holding AEO, she pulls her pants back up and lays her face down on the cot, without changing AEO's soiled diaper. She then covers AEO with a blanket as she continues to cry.

**As to Counts 5 and 6:**

On November 18, 2024, Officers spoke with BOA's (Date of Birth: 07/01/2023) parents, KNA and SMA. KNA stated that she observed BOA with a black eye type bruise on November 9, 2024. KNA stated that she did not receive an incident report regarding anything that happened at daycare that could have caused the bruise. KNA stated that since September of 2024, she has observed small bruises on BOA's head and face area, but stated that she did not think anything of these bruises because BOA had started walking in September of 2024. KNA stated that she also observed that BOA had bruises on her stomach. KNA stated that BOA has become noticeably fussier in the past couple of months and has been waking up in the middle night, which was not something BOA had done previous to September of 2024. KNA stated that BOA will cry for hours on end, and they have gone back to giving her a bottle.

**Surveillance footage as it pertains to the treatment of BOA**

**10/22/24** CH08-20241022-093019-101236

09:48:43 Jakya grabs BOA under both arms and lifts her up and away from HED-H. Jakya puts BOA down in a forceful manner and allows BOA to fall down, then turns and walks away from BOA. BOA remains on the floor face down on all fours and starts to cry.

**10/28/24** CH08-20241028-102927-111144

11:09:08 Jakya walks over to BOA who is in the corner of the room that the camera cannot see. Jakya tells BOA to pick up some books. BOA is pulled from the cameras view abruptly. BOA is out of view from the camera for several seconds and walks back into camera view away from Jakya, crying. MJP is watching this occur.

**10/29/24** CH08-20241029-103820-112037

11:10:45 Jilnya grabs BOA by her right arm and lifts her to the changing table. Jilnya is aggressive with BOA on the changing table and BOA whimpers and Jilnya says, "Shut up" to her two times.

**11/4/24** CH08-20241104-104624-112841

11:00:53: BOA is standing near Jilnya and Jakya near the microwave. Jakya picks up BOA with two hands on her upper forearm area and carries her across the room. BOA immediately starts to cry. Jakya tells BOA to "go play with some toys," and puts her down. BOA continues to cry as she is laying on the floor. Jakya tells her to "be quiet."

**11/8/24** CH08-20241108-143122-151620

15:08:13 BOA lifts her head from her cot and Jakya yells "[BOA]." Jilnya walks over to BOA and says "Nobody's talkin' to you, nobody" and forcefully pulls her legs straight, pushes her down on her back and covers her face and body with the blanket. BOA begins to cry. Jilnya kicks up BOA's cot with BOA laying on it and lets it fall.

**11/8/24** CH08-20241108-151620-155909

15:32:34 The children are finishing their snack at the table and MJP leaves her chair. BOA tries to get up and Jakya says "No, sit down, you're disgusting, nobody's getting you up."

**11/8/24** CH08-20241108-151620-155909

15:53:27 Jakya yells at BOA to get her coat on and when BOA does not respond, Jakya approaches BOA, picks her up and puts her coat on. BOA starts aggressively crying. Jakya is standing behind BOA and BOA's body cannot be seen from the camera view, but Jakya is yelling at BOA and shakes her while she zips her coat.

**As to Counts 7 and 8:**

On November 15, 2024, Officers interviewed JKK's (Date of Birth: 03/18/2023) mother, AJK. AJK stated that JKK had been attending the Nurturing Nook since June of 2023, and attended full time, Monday through Friday. AJK stated that there was a staff turnover approximately three months previous at the daycare, and subsequent to that change, JKK would throw a fit and cling to her when it was time for daycare drop off.

**Surveillance footage as it pertains to the treatment of JKK**

**10/22/24** CH08-20241022-093019-101236

09:58:30 Jakya pulls JKK by her left wrist, and JKK starts crying. While she is on the changing table, Jakya tells her, "All done, shut your mouth, shut your mouth up, I'm not mom. Mom's do that. I'm not." Jakya continues lecturing JKK and as she changes her diaper, throws her legs down, causing JKK to begin to whimper. Jakya, yells, "No! That does not work with me."

**10/22/24** CH08-20241022-101236-105453

10:50:19 Jakya and Jilnya yell at JKK to keep her shoes on. Jakya walks towards JKK and JKK cowers. Jakya grabs JKK's arms and she starts to cry. JKK is blocked from view by Jakya's body. JKK begins to scream.

**10/28/24** CH08-20241028-143829-152356

14:59:37 Jilnya is putting JKK's sock and shoe back on. Jilnya tells JKK to "stop," and pinches JKK's foot. Jilnya pinches JKK's foot a second time while telling her to "Stop." JKK is laying on her cot crying.

15:12:56 Jakya walks over to JKK grabs her by one arm and says, "Get the fuck up". Jakya pulls JKK up from laying down by her one arm. JKK is crying while Jakya is walking her around and while on the changing table.

**10/28/24** CH08-20241028-160613-164831

16:30:40 Jakya puts JKK on the changing table, and once on the table JKK begins to scream and cry. Jakya's body is blocking the view of JKK. JKK was not screaming or crying before being placed on the changing table.

**10/29/24** CH08-20241029-095603-103820

9:50:52 JKK is on the floor, not crying. Jakya picks JKK up by her upper right and left arm. JKK immediately begins to cry. After changing JKK, she cries until she is put on the floor. She then lays on the ground and stops crying. ACT begins to whimper, Jakya turns to ACT and says, "We not going to do that, every time someone do that, it's not for you too."

**10/29/24** CH08-20241029-112037-120254

11:25:20 JKK pushes her book on the floor, Jakya tells JKK to "pick it up" and walks over by JKK. As JKK is trying to pick the book up a page rips. JKK is not crying. Jakya bends down and grabs JKK's right shoulder (11:25:22) while picking up the book up while stating, "You ripped by book." JKK immediately starts crying. Jakya bends down behind JKK and grabs JKK's right arm/shoulder with her right hand. JKK moves slightly to the right and appears in shock, JKK's head pushes forward and Jakya's hand is seen coming off of JKK. Jakya's hand is concealed by a book, JKK turns red and begins screaming. ACT, AEO, HED-H, AI, and BA are all watching as this occurs. Jakya walks away and says, "All done [JKK]." Jakya looks towards the door as JK screams.

**10/29/24** CH08-20241029-145502-153721

15:07:38 Jakya has JKK stand up from the chair. Jakya unzips JKK's onesie and appears to evaluate her right shoulder area for marks/bruises.

**10/31/24** CH08-20241031-094839-103056

10:23:33 Jilnya tells JKK to move, grabs her ear, pinches it and turns JKK while squeezing her ear and says "Bye", and pushes JKK in the other direction. JKK walks away and reaches up to her ear and rubs it and holds it. Jilnya looks at Jakya and states, "you see her holding her ear, I pulled that bitch, I'm about to pull that bitch off." JKK continues to hold her ear for several seconds.

**10/31/24** CH08-20241031-103056-111315

11:02:30 Jilnya grabs JKK and lifts her up by one arm and leads her away from HED-H. JKK immediately begins to cry.

**10/31/24** CH08-20241031-115532-123845

12:03:45 Jilnya grabs JKK by one arm and pulls her up off of the chair to a standing position. JKK starts to cry, Jilnya grabs and squeezes JKK's arm and states, "We do not stand on the chairs [JKK], no thank you." JKK walks away while crying.

**As to Counts 9 and 10:**

On November 15, 2024, Officers interviewed HED-H's (Date of Birth: 09/07/2023) mother, MD. MD stated that HED-H has been enrolled at Nurturing Nook full time since January 15, 2024. MD stated that after she learned about the allegations, she took HED-H to get a full physical check-up. MD stated that in the past few weeks, HED-H had been more difficult to put down to sleep, and had been waking up more during the night, which was uncharacteristic for her. MD stated that on October 4, 2024, HED-

H returned home from daycare with bruising on her right ear. MD provided photos of this injury to Officers. MD also provided photos of MD on October 3, 2024, which depicted HED-H without injuries to her ear. MD stated that Jilyna and Jakya were HED-H's teachers on October 4, 2024. MD also stated that she did not receive an injury report from Nurturing Nook regarding injuries to HED-H's ears on October 4, 2024. MD also stated that HED-H had scratch mark and injuries under her arms that were unexplained by daycare staff, and was able to provide photos of those injuries. MD stated that after she learned about the allegations, she took HED-H to get a full physical check-up. On November 19, 2024, HED-H was evaluated by Child Advocacy ADNP Kristin Alinea. MH provided photos of HD from October 4, 2024, which NP Alinea noted depicted the following:

- Right ear with a red lesion to the anthihelix
- Small red lesion to the left lateral upper chest, adjacent to the arMPit
- Small red lesion to the right lateral upper chest, adjacent to the arMPit

NP Alinea noted that the photos of these injuries raise concerns for inflicted trauma. NP Alinea noted that ear bruising is rarely caused by accidental means in childhood, and is not expected to occur during typical care, handling, or activity of a health child. Ear bruising is highly concerning for inflicted trauma.

Employment records from Nurturing Nook indicate that both Jakya and Jilnya were working on October 4, 2024, and assigned to HED-H's classroom.

#### **Surveillance footage as it pertains to the treatment of HED-H :**

**10/22/24** CH08-20241022-151716-155933

15:59:24 HED-H starts crying next to the table, Jilnya grabs her by one arm, lifts her up by her one arm over her head, her one arm supporting her own body weight, flips HED-H upside down and carries her in an upside-down position for a few feet, then places her on the ground by setting her down while holding one of HED-H's arms, again HED-H supporting her body weight by her one arm. HED-H continues to cry while sat on the ground.

**10/25/24** CH08-20241025-101015-105232

10:20:25 After painting, Jakya grabs HED-H by the wrist and attempts to pull her away from the table by pulling HED-H's arm across her body. Jakya then grabs HED-H's upper arm and attempts to push HED-H away from the table, causing HED-H to cry. Jakya then picks up HED-H underneath both arms and carries her away from the table while she is still crying. HED-H's full body weight is being supported by her two arms while Jakya carries HED-H in front of her.

**10/25/24** CH08-20241025-101015-105232

10:45:47 Jakya pushes the table into HED-H knocking her over onto the ground and she began to cry.

**10/25/24** CH08-20241025-153008-161309

15:39:46 Jilnya tells HED-H "Don't touch my table." HED-H sets her hand on the table and Jilnya grabs HED-H's arm causing her to fall down onto her bottom and she starts crying. Jakya walks HED-H away from the table.

**10/29/24** CH08-20241029-070430-074913

8:20:42 Jakya leans down by HED-H and HED-H is not crying. Jakya has both her hands by HED-H and HED-H begins crying loudly. It cannot be seen what Jakya is doing.

8:21:21 Jakya tells HED-H, "Drink that bottle" HED-H is not crying. Jakya leans down and puts one arm where HED-H is, HED-H begins crying loudly.

**10/29/24** CH08-20241029-112037-120254

11:51:36 HED-H is sitting at the table not crying. HED-H appears to drop food onto the floor. Jakya walks towards HED-H and her head appears to push slightly to the left. HED-H immediately grabs her right ear and begins to cry. Jilnya observes this happen. ACT, AEO, AI, BA, JK all observe this happen.

**10/29/24** CH08-20241029-083128-091345

8:41:49 Jilnya puts a chair down, reaches over the table and grabs HED-H by her right arm. HED-H then twists in the air and is harshly placed in the chair as she cries. While Jilnya is doing this she says to HED-H, "you're irritating as (inaudible)" HED-H continues to cry as Jilnya continues speaking (inaudible).

8:42:38 HED-H stopped crying and is playing with toys at the table. Jakya takes the toys away and HED-H begins to cry. Jakya yells, "enough!"

9:00:18 HED-H is sitting in the chair, not crying. Jilnya picks HED-H up and carries her under her right arm. Jilnya walks with her until she is partially concealed by the book shelf. Jilnya appears to drop HED-H causing her to tip over and start crying immediately. Jilnya hands HED-H milk and HED-H continues to cry.

9:02:53 HED-H gets up from laying on the floor where Jilnya put her. She walks towards the table. Jakya grabs HED-H by her left wrist and drags her across the room as HED-H tries to put her feet down. HED-H immediately begins crying.

**10/29/24** CH08-20241029-091345-095603

9:14:55 HED-H is walking next to the table, not crying. Jilnya grabs HED-H's left shoulder and drags her to the ground. HED-H immediately begins crying. Jilnya goes back to looking at her tablet and does not comfort HED-H.

9:16:45 HED-H is on the ground, not crying. Jilnya grabs HED-H by left arm and carries her across the room. HED-H immediately begins crying. This is directly in front of Jakya. Jilnya aggressively puts HED-H, partially concealed by the bookshelf, however; it appears HED-H falls backwards. Jakya then sits HED-H up and takes her bottle from her. HED-H continues to cry.

9:17:29 HED-H continues to cry and Jakya yells, "all done HED-H, all done."

**11/05/24** CH08-20241105-094146-102403

10:05:15 Jilnya picks HED-H up by one arm and brings her to her lap to do a craft.

10:06:48 Jilnya puts HED-H down by her right arm. Her entire weight is being supported by her arm. HED-H immediately begins crying.

**11/11/24** CH08-20241111-092516-100733



10:02:08 HED-H in standing near a toy she was told to step away from. Jakya walks over to HED-H and picks her up by her upper arm area and carries her across the room like this setting her down in a chair. HED-H immediately starts to cry.

**As to Counts 11 and 12:**

On November 15, 2024, Officers interviewed ACI's (Date of Birth: 05/22/2023) mother, EC. EC stated that ACI has been enrolled at Nurturing Nook since September 2023, and attends full time, Monday through Friday. EC stated that recently, ACI has been vocal about not liking diaper changes, which included kicking and screaming when it's time to change her diaper. Additionally, EC observed that ACI has not liked having her shirt taken off of her arms. EC observed that ACI has recently begun to not put her arms up when it's time to take her shirt off.

On November 20, 2024, EC contacted law enforcement and requested to speak with investigators. EC provided 4 copies of incidents reports from Nurturing Nook and requested that law enforcement review video to determine if what is reported in the incident matches the video.

**Surveillance footage as it pertains to the treatment of ACI**

**10/24/24** CH08-20241024-105834-114051

11:27:40 Jakya places ACI in a chair and pulls her left arm to move her. ACI begins to cry. Jakya picks ACI up under her arms and sets her on the ground near Jilnya. Jilnya grabs ACI by under her left shoulder with one hand and twists her up to her lap. ACI's full body weight is being supported by her one arm. ACI continues to cry. Jakya says, "All done ACI, all done."

**10/24/24** CH08-20241024-140809-145314

14:44:09 Jilnya grabs ACI by one arm and lifts her up by one arm from a supine position. ACI's full body weight is supported by her one arm.

**10/29/24** CH08-20241029-103820-112037

11:14:40 Jakya walks up to ACI and yells (inaudible). Jakya then says, "ugh, you ugly ass."

**11/11/24** CH08-20241111-143753-152805

15:24:13 Jilnya walks over to ACI who is still laying on her sleeping cot. Jilnya picks ACI up off of the cot by her left arm, so her entire body weight is support by her left arm.

**As to Counts 13 and 14:**

On November 18, 2024, Officers interviewed RJ's (Date of Birth: 11/18/2022) parents, SJ and RJ. SJ stated that RJ has been enrolled at Nurturing Nook since August 28, 2024, and attends full time, Monday through Friday. SJ stated that RJ would cry every day at daycare drop off, except for Wednesdays. SJ stated that on Wednesday's there was a teacher present with the Chandler sisters.

**Surveillance footage as it pertains to the treatment of RJ**

**10/22/24** CH08-20241022-105453-113710

11:11:07 Jilnya calls for RJ to come to the changing table. Jilnya reaches down grabs RJ under both arms, lifts her up, turns her 180 degrees with all of RJ's weight being supported by her own shoulders, and sets her on the changing table.

**11/05/24** CH08-20241105-114837-123542

11:50:48 Jilnya lifts RJ by her left arm, RJ's entire body weight is supported by her arm.

**As to Counts 15 and 16:**

On November 15, 2024, Officers interviewed TO's (Date of Birth: 06/01/2023) parents, JO and KO. JO stated that TO attended Nurturing Nook on Thursdays and Fridays, and had been in the Teddies Classroom for a few months. JO stated that for the last 6 weeks, TO had been waking up in the middle of the night screaming. JO also stated that she observed TO was much more irritable getting his diaper changed. JO also observed that when they would pick TO up from daycare, he would walk towards them with his arms up and start crying. JO stated that there were many times when she would bring him home from Nurturing Nook and he would lay on the floor and cry. JO stated that she noticed nail marks near TO's armpits that were not on TO prior to go to daycare, and present when he arrived home, after being in Jakya and Jilnya's care.

On November 15, 2024, TO was seen by doctors at the Children's Hospital of Wisconsin Emergency Room. TO's mom reported to doctors that approximately 9 days prior, she observed what appeared to be nail marks under TO's armpit, but thought nothing of it at the time of observation. KO told doctor's that, following reports by law enforcement regarding the investigation, he was concerned about the injuries and wished for TO to be evaluated. Doctors observed that TO had two .25 cm superficial healing wounds to the left and right side of his chest.

**Surveillance footage as it pertains to the treatment of TO**

**10/24/24** CH08-20241024-085143-093400

09:06:23 Jilnya reaches down and grabs TO's arm and forcefully lifts him up by his one arm to get him to a standing position. Jilnya walks TO around the room in an attempt to get him to stop crying. At the table, Jilnya picks TO up by one arm and sets him in a chair at the table. TO's full body weight was supported by his one arm.

**10/31/24** CH08-20241031-074147-082405

08:07:38 Jilnya grabs TO, who has been crying since he arrived, by one arm and pulls him toward her and puts him on the floor. TO's feet leave the ground when pulled.

**10/31/24** CH08-20241031-094839-103056

09:51:13 Jilnya grabs TO's arm and aggressively lifts him up off the ground. TO is almost parallel with the ground suspended in the air by his one arm, all of TO's body weight is being supported by his one arm. Jilnya carries TO in this position tells him to "sit down" and sets him on his feet where TO then falls forward onto the ground, face down, where he can be heard screaming and crying in a face down position.

**11/01/24** CH08-20241101-082019-090237

08:51:40 All of the kids are sitting around the table eating their breakfast. TO begins to cry in his chair. Jilnya walks over to TO, grabs him one handed by his right arm and lifts him straight up with his feet off of the ground. Jilnya carries TO approximately three feet and begins to drag him by his arm. Jilnya again pulls him straight up by his arm over some toys on the floor, and continues to drag TO to the corner of the room, and puts him out of the view of the camera. TO continue to cry in the corner of the

room. MJP and the other children watch this occur. Jilnya then goes and sits down and begins to use an iPad. Jakya walks over to where TO is, and tells him to go lay down. TO walks to a cushion on the floor and lays down on it.

8:55:58 TO continues to cry as he is laying on a cushion. Jakyla tells TO to lay down again and walks over to TO who is still crying. Jakya grabs TO by his right arm and picks up him, placing him face down on the cushion. TO continues to cry.

9:02:10 TO is now standing near the table and crying. Jakya grabs TO by the right arm again, and picks him up one handed, and puts him back down onto the cushion face down. Jakya walks away from TO.

**11/01/24** CH08-20241101-090237-094454

09:03:07 TO continues to cry on the cushion, Jakya reapproaches him and lifts him up by his right forearm.

09:08:07 TO is still crying, laying on the cushion on the floor. Jakya approaches TO and picks him up by his right arm and carries him to the sink area.

**11/01/24** CH08-20241101-115145-125602

11:55:13: Jilnya is assisting TO with washing his hands, when he is done, she picks him up off of the step stool by his upper arm area and carries him to his sleeping cot. TO is also put face down on the cot, and then he is covered entirely by a blanket.

### **As to Counts 1-16:**

In a *mirandized* statement, Jilnya stated that if investigators reviewed the video footage from the classroom where she worked, there would be “nothing concerning” observed. Jilnya further stated that she never punished any of the children, and she is not allowed to punish due to their age. Jilnya stated that she always picks children up by grabbing them under their arms, waist, and stomach area. She stated that she never picked up a child by one arm. Jilnya further stated that when she was a baby, she got picked up by one arm and her arm got dislocated, so she knows not to pick children up by one arm, as it can cause them harm. When questioned about ACT, Jilnya stated that she has never noticed any marks or bruises on ACT. Jilnya stated that she did not notice any bruises on ACT while she was changing him, and she writes up everything if she notices any marks or bruises on children. Jilnya stated that she has never yelled at ACT. Jilnya denied telling ACT to “shut the fuck up” despite the surveillance recording depicting her saying that.

### **Other Acts Evidence<sup>2</sup>**

On November 15, 2024, Officers interviewed MJP’s (Date of Birth:03/22/2023) parents, RP and CH-P. RP stated that MJP has been attending Nurturing Nook daycare since April of 2024, and attends on Mondays, Wednesdays, and Fridays. RP stated that in the last month or two, MJP will often point to her forearms and say “owie” or sometimes “owie baby.” RP stated that MJP will call her friends at daycare “baby.” RP stated that on October 15 or 16, MJP returned home from daycare with a bruise on her right cheek, under her eye. RP stated that they were not informed of what occurred, nor were they requested to sign any incident report on the day the bruise was located. RP stated that approximately two weeks

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<sup>2</sup> The State reserves the right to add additional charges related to the treatment of MJP, SRB, and RAP.

after that incident, CH-P located a half sheet of paper, stuck in between a plastic bin in MJP's cubby. CH-P recalled that the note was dated October 16, and was signed by her classroom teacher. CH-P indicated that the note indicated that they noticed a bruise on her face. CH-P indicated that she had never received information from Nurturing Nook in the past, and that she always received a phone call or e-mail promptly from the director if there was a problem or they noticed something wrong with MJP. RP indicated that when he dropped MJP off for daycare recently, she did not run up and give Jakya and Jilnya a hug like she usually did to other teachers she has had in the past. RP stated that it appeared to him that MJP did not feel as comfortable with the defendants as she did with her other teachers.

On November 19, 2024, Officers interviewed SRB's (Date of Birth: 08/15/2023) parents—HB and TB. HB stated that SRB has been enrolled at the Nurturing Nook since July 15, 2024, and attends part time on Mondays and Fridays. HB stated that SRB has been in the Teddies classroom since September 23, 2024. HB and SB stated that SRB started walking in the middle of September, and when she fell she began to hold her wrists as if they were sore. HB and TB stated that even after SRB's walking improved and she no longer fell, she still held her wrist. HB and TB stated that this behavior concerned them to the point of going to get SRB's wrists evaluated and x-rays done. TB stated that SRB has been breastfed since she was born, and she only takes the right breast, which requires her to lay on her left shoulder to latch. TB stated that SRB has been breastfeeding in this position for 15 months. TB stated that SRB's wraps her left arm up around TB as she feeds. SRB stated that for approximately three days in a row, SRB was trying to pull her left arm down to her stomach as if her shoulder was hurting her. TB and HB also stated that since SRB started in the defendants' classroom, she has been waking up in the middle of the night "screaming." TB stated that this was going on for a month where SRB would frequently wake up screaming and inconsolable. TB stated that on October 21, 2024, after being at daycare during the day, SRB was inconsolable at night. TB stated that prior to entering the Teddie's classroom, SRB slept through the night without waking.

On December 20, 2024, Officers interviewed RAP's (Date of Birth: 06/06/2023) parents—Chad and Chezney. Chezney indicated that RAP was enrolled at the Nurturing Nook from January 2024 and his last day was October 8, 2024. Chezney stated that RAP attended on Mondays, Tuesdays, and Thursdays. Chezney indicated that RAP stopped attending Nurturing Nook because she was getting a "weird feeling" from the center. Chezney stated that RAP had a very difficult time at daycare drop-off in the mornings. Chezney stated that RAP began walking in September of 2024, and he had bumps and bruises, primarily on his forehead, which they attributed to him beginning to walk. Chezney stated that they received incident reports from the Nurturing Nook when RAP was under Jilnya and Jakya's care, indicating that RAP fell and hit his head, or was fighting over a toy with another child. Investigators requested all incidents reports for children under the care of Jilnya and Jakya's care, and received none regarding RAP. Chad provided a photo from October 5, 2024, which showed that RAP had an injury to his lower lip and chin. Chezney and Chad stated that this injury was unexplained, and did not recall any incident happening at home that would have caused the injury. Employment records indicate that Jakya and Jilnya were working and assigned to RAP's classroom on Thursday, October 3, 2024.

\*\*\*\*End of Complaint\*\*\*\*

**Electronic Filing Notice:**

This case was electronically filed with the Milwaukee County Clerk of Circuit Court office. The electronic filing system is designed to allow for fast, reliable exchange of documents in court cases. Parties who register as electronic parties can file, receive and view documents online through the court electronic filing website. A document filed electronically has the same legal effect as a document filed by traditional means. You may also register as an electronic party by following the instructions found at <http://efiling.wicourts.gov/> and may withdraw as an electronic party at any time. There is a \$ 20.00 fee to register as an electronic party. If you are not represented by an attorney and would like to register an electronic party, you will need to contact the Clerk of Circuit Court office at 414-278-4120. Unless you register as an electronic party, you will be served with traditional paper documents by other parties and by the court. You must file and serve traditional paper documents.

Criminal Complaint prepared by Emily Zimmel.

Subscribed and sworn to before me on 02/10/25

Electronically Signed By:

Emily Zimmel

Assistant District Attorney

State Bar #: 1116773

Electronically Signed By:

Investigator Leah Gabrielse

Complainant