FILED
03-25-2025
Anna Maria Hodges
Clerk of Circuit Court
2025CF001457
Honorable Kristy Yang-47

STATE OF WISCONSIN

CIRCUIT COURT MILWAUKEE COUNTY

STATE OF WISCONSIN

Plaintiff,

DA Case No.: 2025ML007191

Court Case No.:

VS.

CRIMINAL COMPLAINT

ROSS, JOSEPH RALPH 3627 SOUTH 77TH STREET MILWAUKEE, WI 53220 DOB: 04/12/1990

Defendant(s).

For Official Use

Branch 47

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

Count 1: PLACING FOREIGN OBJECTS IN EDIBLES

The above-named defendant on or about Thursday, March 20, 2025, at 8201 Main Street, in the City of West Allis, Milwaukee County, Wisconsin, did place a substance in liquid edibles with the intent to cause bodily harm to another person, contrary to sec. 941.325, 939.50(3)(i) Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

Probable Cause:

Complainant is an employee of the Wisconsin State Fair Park law enforcement officer and bases this complaint upon official Wisconsin State Fair Park Police Reports. Complainant has relied on such reports in the past and have found them to be truthful, accurate, and regularly relied upon in the course of that department's business. Such incident reports indicate the following:

On Thursday, March 20, 2025, at approximately 11:00 a.m., Wisconsin State Fair Park Police Officers Lieutenant Robert Rehbein and Deputy Chief Glenn Janzer were conducting a foot patrol of the Wisconsin State Fair Park Exhibition Center located at 8201 West Main Street, in the City of West Allis, County of Milwaukee, Wisconsin. Upon patrolling, the Officers made contact with JH (DOB 12.13.1988) who requested a private conversation with the Officers. During the conversation, JH told the Officers that approximately 2 to 3 weeks ago, JH suspected that her beverages on her desk had been contaminated by a chemical substance. JH was made aware of the contamination, due to the strong chemical smell and taste. JH stated that upon consumption of those beverages, she became ill. Moreover, JH did not consent to anyone placing anything in her drink.

Due to past events, JH told the Officers that earlier that day, on Thursday, March 20, 2025, at approximately 9:23 a.m., JH set up a surveillance camera concealed below her computer monitor to see if anyone was putting substances into her beverage. At approximately 9:52 a.m., JH's camera captured JH's co-worker, whom JH shares an office with, Joseph R. Ross, hereinafter the Defendant, put a foreign substance into JH's soft drink. JH shared the video footage with the Officers. JH did not consent to the Defendant placing the substance into her soft drink. Based on their receipt of the footage, the Officers started their investigation. See below screenshot of surveillance video.



Based on Lt. Rehbein's review of the surveillance camera footage, Rehbein observed the following: this video contains two segments. One captures JH's initial activation of the camera. The remaining segment captures the Defendant dispensing a liquid substance inside the open can of Coke on JH's desk. The Defendant is observed to be wearing blue jeans, a burgundy long sleeve shirt, and clear latex gloves on both of his hands. The Defendant is in possession of a small bottle/tube type dispenser, with white nozzle. The dispenser appears to be brown/orange in color with a white tube nozzle disappear from camera view at the top of the can. The Defendant is observed to pinch and manipulate the small bottle/tube with his left thumb and forefinger while continuously holding the dispenser above the can of soda. The Defendant exit the office past his desk and walk in a south direction in the lobby hallway out of camera view.

On March 20, 2025, at approximately 5:20 p.m., Lt. Rehbein conducted a mirandized interview of the Defendant. During the interview, the Defendant admitted to placing a supplement into JH's soft drink – Coca Cola.

As the Officers continued their investigation, they obtained a search warrant of the Defendant's desk to search for supplements that the Defendant referenced in his mirandized interview. Additionally, the Officers searched for the latex gloves and substance container. During the Officers search, they located a trash container at the north end of the loading dock, from the double door entrance – near the Defendant and JH's office. Inside the trash bag, the Officers observed various types of garbage. Along with the garbage, the Officers located a set of clear protective gloves. The gloves were wadded up into a ball. When the Officers unraveled the gloves, the Officers found that each contained an item. One glove contained a blue plastic cap. The other glove contained a super glue container. As I unraveled the gloves more, I found that the container was a Gorilla Brand Super Glue. The container was a 3 gram or .11-ounce container. The container appeared to have been opened, and the white plastic spout had been attached.





Lt. Rehbein observation of the gloves and the tube match JH's video footage. Moreover, the Gorilla Super Glue has a warning on to "Keep of the reach of Children" due to the harm of ingestion. The Officers have submitted the soft Drink to the Wisconsin Crime Lab for testing.

Based on the Officers' findings, the Defendant was placed under arrest and transferred to the Criminal Justice Facility for processing.

****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

Page | 4

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 Gerald H. Alder. ADA Assigned Email Address: Gerald.Alder@da.wi.gov

Subscribed and sworn to before me on 03/25/25 Electronically Signed By: Gerald H. Alder Assistant District Attorney

State Bar #: 1119964

Electronically Signed By: Robert REHBEIN Complainant