

EXCLUSIVE: Randy Bryce Campaign Staffer Accuses Kenosha County Board Member of Harassment While On Campaign Job

I have learned that a staffer for Democrat Randy Bryce's campaign staff is accusing Kenosha County Board Member Joe Cardinali of harassing her and is seeking a restraining order against him. The woman making the accusation alleges she met Cardinali while working on Bryce's campaign and that since then Cardinali has persisted in attempting to develop a romantic relationship with her despite her repeated attempts to get him to back off. The woman alleges Cardinali said he would use his Kenosha Democratic ties if she didn't do what he wanted. She alleges Cardinali even contacted her employer. It is not clear who that person is or what his or her involvement is with Bryce's campaign.

Kenosha area political sources say some area Democrats have tried to get the woman to back off the allegations but that she refused. She filed a request for a restraining order last week, on the same day Cardinali was named to the Kenosha County Board. Cardinali has been a member of the board 9in Somers and was recently named to the county board to succeed a member who recently died.

Neither Bryce nor his campaign staff have responded to my requests for comment.

Cardinali, in an email to me, denied doing anything wrong. He said his attorney and the lawyer for the woman making the accusations have agreed to hold no further court hearings on the order until November.

The complaint is on the following pages.

AUG 22 2018

WAIVER OF FEES

RE: HARASSMENT TRICIA MATOSKA-MENTINK
CLERK OF CIRCUIT COURT

Case No, 18-CV- 936

Petitioner

v.

Joseph Cardinali
Respondent

The Petitioner is advised that a filing fee for this action is \$164.50.

The Petitioner is further advised that a filing fee can not be charged for the commencement of a Petition for Restraining Order in the following actions;


- A Petition for Restraining Order alleging child abuse under sec. 813.122, Stats.;
- A Petition for Restraining Order involving a vulnerable adult under sec. 813.123, Stats.;
- A Petition for Restraining Order alleging harassment under sec. 813.125, Stats. if the petition alleges conduct that is the same or similar to conduct that is prohibited by sec. 940.32 Stats. (Stalking) or that is listed in sec. 813.12(1)(am)1-6.
 - >Intentional infliction of physical pain, physical injury or illness;
 - >Intentional impairment of physical condition;
 - >A violation of s. 940.225(1), (2) or (3);
 - >A violation of s. 943.01, involving property that belongs to the individual;
 - >A threat to engage in the conduct under subd. 1, 2, 3 or 5.

The respondent is advised that, pursuant to sec. 814.61(1)(e), Stats., if no fee is collected from the petitioner, the fees that would be charged for the petition filed and granted must be collected from the respondent if he or she is convicted of violating a temporary restraining order or injunction issued under secs. 813.122, 813.123, or 813.125, Stats. Fees for service and travel covered under sec. 814.70(1) and (3), Stats. are included in this charge.

FILING FEES ARE WAIVED IN THIS ACTION BY DETERMINATION OF STALKING.

Dated at Kenosha, Wisconsin this 22 day of August, 2018.

BY THE COURT:


Circuit Court Judge/Commissioner

STATE OF WISCONSIN, CIRCUIT COURT, KENOSHA COUNTY

☐ Amended
Temporary Restraining Order
(Temporary Order of Protection)
and Notice of Injunction Hearing
(Harassment - 30711)

Case No. 18CV 936

FILED

AUG 22 2018

REBECCA MATOSKA-MENTINK
CLERK OF CIRCUIT COURT

PETITIONER (PERSON TO BE PROTECTED)

Name of Petitioner (First, Middle, Last)

Date of Birth of Petitioner

7/27/69

-VS-

RESPONDENT/DEFENDANT

Name of Respondent/Defendant (First, Middle, Last)

Joseph Cardinali

Respondent's/Defendant's Street Address, City, State, Zip

1618 12th Ave
Kenosha, WI 53140

Please specify Petitioner's relationship(s) to Respondent/Defendant:

- ☐ spouse ☐ cousin ☐ adoptive parent
☐ former spouse ☐ sibling ☐ grandparent
☐ person in dating relationship ☐ parent ☐ child (biological/adoptive/step)
☐ current or former live-in relationship ☐ step parent

☒ Other: [Be specific] Acquaintance

SEX	RACE	DOB	HT	WT
M	W	27yrs	58	170

HAIR COLOR

Brd

EYE COLOR

Brd

Respondent's/Defendant's Distinguishing Features
(such as scars, marks or tattoos)

☒ None known.

CAUTION:

(Check all that apply)

- ☐ Respondent/Defendant has access to weapon(s). Type of weapon(s): _____
Location of weapon(s): _____
☐ Weapon(s) were involved in an incident (past or present) involving petitioner.

THE COURT FINDS:

Findings are on the following page(s) of this temporary restraining order.

8/27/18 At 9:15 AM

THE COURT ORDERS:

Orders are on the following page(s) of this temporary restraining order.

THIS TEMPORARY RESTRAINING ORDER SHALL BE EFFECTIVE UNTIL

Date of Hearing
Injunction Hearing Date - Not to exceed 14 days

NOTIFICATIONS/WARNINGS TO RESPONDENT/DEFENDANT:

This order shall be enforced, even without registration, and is entitled to full faith and credit in every civil or criminal court of any state, the District of Columbia, any U.S. Territory, and may be enforced by Tribal Lands (18 U.S.C. Section 2265; Wis. Stats. 813.128). Crossing state, territorial, or tribal boundaries to violate this order may result in federal imprisonment (18 U.S.C. Section 2262).

Federal law provides penalties for, and you may be prohibited from possessing, transporting, shipping, receiving or purchasing a firearm, including, but not limited to, a rifle, shotgun, pistol, revolver, or ammunition, pursuant to 18 U.S.C. 922(g)(8). Additional notifications/warnings are on the following page of this temporary restraining order.

Violation of this temporary restraining order shall result in immediate arrest and is punishable by imprisonment not to exceed 9 months or a fine not to exceed \$10,000, or both, payment of filing and service fees, and an order for GPS tracking.

Only the court can change this order.

THE COURT FINDS:

1. The petitioner or person on behalf of petitioner filed a petition alleging harassment under §813.125, Wis. Stats.
2. This court has personal and subject matter jurisdiction.
3. There are reasonable grounds to believe that the respondent has engaged in harassment with intent to harass or intimidate the petitioner as defined in §813.125, Wis. Stats.
4. The court orders a temporary restraining order and sets a date for an injunction hearing.

THE COURT ORDERS:

1. A hearing for an injunction be held on

Date <u>8/27/2018</u>	Time <u>9:15 AM</u>	Location Pretrial Facility - Intake Court Room 157 927 54 th Street Kenosha WI 53140
Circuit Court Judge/Circuit Court Commissioner Intake Commissioner		

2. Service of this notice and order shall be made at least 48 hours prior to the hearing.
- ☒ 3. The action may be commenced without payment of filing fees because the petition alleges conduct that is the same as or similar to conduct that is prohibited under §940.32, Wis. Stats.; or is intentional infliction of physical pain, physical injury or illness; or is an intentional impairment of physical condition; or is a §940.225(1), (2) or (3), Wis. Stats.; or is a violation of §943.01, Wis. Stats., involving property that belongs to the individual; or is a threat to engage in the above mentioned conduct.
- ☒ 4. The respondent cease or avoid the harassment of the petitioner.
- ☒ 5. The respondent avoid the petitioner's residence and/or any premises temporarily occupied by the petitioner.
- ☐ 6. The respondent avoid contact that harasses or intimidates the petitioner. *Contact includes: contact at petitioner's home, work, school, public places, in person, by phone, in writing, by electronic communication or device, or in any other manner.*
- ☐ 7. The respondent refrain from removing, hiding, damaging, harming, or mistreating, or disposing of, a household pet.
- ☐ 8. The respondent allow the petitioner or a family member or household member of the petitioner acting on his/her behalf to retrieve a household pet.
- ☒ 9. The respondent avoid contacting the petitioner or causing any person other than a party's attorney or law enforcement officer to contact the petitioner unless the petitioner consents in writing.
- ☒ 10. The sheriff to accompany the petitioner and assist in placing the petitioner in physical possession of his/her residence, if requested.
- ☐ 11. Other: *[May not be inconsistent with remedies requested in the petition.]*

(Harassment is defined as: (a) Striking, shoving, kicking or otherwise subjecting the person to physical contact; or (b) Engages in an act that would constitute child abuse under §48.02(1); or (c) Sexual assault under §940.225; or (d) Stalking under §940.32; or attempts or threatens to do same; or (e) Engages in a course of conduct or repeatedly commits acts which harass or intimidate the person and which serve no legitimate purpose.)

FAILURE TO APPEAR could result in an injunction being issued directing you to

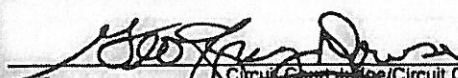
- cease or avoid the harassment of the petitioner;
- avoid the petitioner's residence and/or any premises temporarily occupied by the petitioner;
- avoid contact that harasses or intimidates the petitioner. *Contact includes: contact at petitioner's home, work, school, public places, in person, by phone, in writing, by electronic communication or device, or in any other manner;* AND
- follow any other orders made by this court.

VIOLATION OF AN INJUNCTION if issued at this hearing shall result in your arrest and may result in the imposition of criminal penalties regardless of whether you have been served a copy of the injunction. Service of a copy of this notice of injunction hearing and the petition for the temporary restraining order and/or injunction is constructive knowledge of the existence of the injunction.

THIS TEMPORARY RESTRAINING ORDER IS IN EFFECT UNTIL THE INJUNCTION HEARING.

BY THE COURT:

If you require reasonable accommodations to participate in the court process due to a disability, please call (262)653-2664 at least 10 working days prior to the scheduled court date. Please note that the court does not provide transportation.



Geoffrey Dowse
Circuit Court Judge/Circuit Court Commissioner

Title (Print or Type Name if not eSigned)

August 27, 2018

Date

DISTRIBUTION:

1. Court
2. Petitioner
3. Person filing on behalf of the petitioner
4. Respondent
5. Law Enforcement
6. Other: _____

STATE OF WISCONSIN, CIRCUIT COURT, KENOSHA COUNTY

Name of person to be protected (Petitioner):

Name of person completing Petition (if different from Petitioner):
Date of Birth of Petitioner:

7/27/69

Petition for
Temporary Restraining
Order and/or Petition and
Motion for Injunction
Hearing

(Harassment - 30711)

-VS-

Respondent/
Defendant:

Address:

Joe Cardinali
1618 12th Ave.
Kenosha, WI 53140

Case No. 18CV 936

FILED

'AUG 22 2018

REBECCA MATOSKA-MENTINK
CLERK OF CIRCUIT COURT

If there is a CHIPS proceeding involving the child or the respondent is a minor, Use JC-1693. Do not use this form.

Respondent's:	Sex: <u>M</u>	Race: <u>W</u>	Date of Birth: <u>22yrs. old</u>	Height: <u>5'8"</u>	Weight: <u>170</u>	Hair color: <u>Brn</u>	Eye color: <u>Brn</u>
Please specify Petitioner's relationship(s) to Respondent:						Respondent's Distinguishing Features: (such as scars, marks or tattoos)	
<input type="checkbox"/> spouse <input type="checkbox"/> former spouse <input type="checkbox"/> person in dating relationship <input type="checkbox"/> current or former live-in relationship <input checked="" type="checkbox"/> Other: (Be specific) <u>Acquaintance</u>						<input type="checkbox"/> cousin <input type="checkbox"/> sibling <input type="checkbox"/> parent <input type="checkbox"/> step parent <input type="checkbox"/> adoptive parent <input type="checkbox"/> grandparent <input type="checkbox"/> child (biological/adoptive/step) <input checked="" type="checkbox"/> None known.	

CAUTION:
(Check all that apply)

- ☐ Respondent has access to weapon(s). Type of weapon(s): _____
Location of weapon(s): _____
☐ Weapon(s) were involved in an incident [past or present] involving the petitioner.

I am: (Check one)

- ☒ petitioner.
☐ parent of the petitioner.
☐ Other: _____

- ☐ stepparent of the petitioner.
☐ legal guardian of the petitioner.

☐ guardian ad litem for child

I PETITION THE COURT for a temporary restraining order/or and injunction against the respondent under §813.125, Wis. Stats., based on the following:

1. Stated below or attached as part of this petition is a statement of facts indicating that respondent has engaged in conduct which is believed to be harassment.

(Harassment is defined as: (a) Striking, shoving, kicking or otherwise subjecting the person to physical contact; or (b) Engaging in an act that would constitute child abuse under §48.02(1); or (c) Sexual assault under §940.225; or (d) Stalking under §940.32; or attempts or threat to do same; or (e) Engaging in a course of conduct or repeatedly committing acts which harass or intimidate the person and which serve no legitimate purpose.)

(State when, where, what happened, and who did what to whom)

☒ See attached

2. ☒ Another no contact order between the petitioner and the respondent does not exist or the petitioner does not know or is uncertain as to whether another no contact order exists.
☐ does exist.

Name of other case: _____
County or State: [If not Wisconsin] _____
Type of Case: _____
Case Number: [If known] _____
Date of proceeding that resulted in no contact order: [If known] _____
Details of no contact order: _____

I REQUEST THE COURT: (Mark any of the following boxes that apply.)

- ☒ 1. Issue a temporary restraining order requiring the respondent to
 - ☒ a. cease or avoid harassing the petitioner.
 - ☒ b. avoid the petitioner's residence and/or any premises temporarily occupied by the petitioner.
 - ☒ c. avoid contact that harasses or intimidates the petitioner. *Contact includes: contact at petitioner's home, work, school, public places, in person, by phone, in writing, by electronic communication or device, or in any other manner.*
 - ☐ d. refrain from removing, hiding, damaging, harming, or mistreating, or disposing of, a household pet.
 - ☐ e. allow the petitioner or a family member or household member of the petitioner acting on his/her behalf to retrieve a household pet.
 - ☒ f. avoid contacting the petitioner or causing any person other than a party's attorney or law enforcement officer to contact the petitioner.
 - ☐ g. Other: (List other specific behavior the petitioner wants the respondent to stop doing.) _____
- ☒ 2. Set a time for a hearing on the petition for an injunction requiring the respondent to
 - ☒ a. cease or avoid harassing the petitioner.
 - ☒ b. avoid the petitioner's residence and/or any premises temporarily occupied by the petitioner.
 - ☒ c. avoid contact that harasses or intimidates the petitioner. *Contact includes: contact at petitioner's home, work, school, public places, in person, by phone, in writing, by electronic communication or device, or in any other manner.*
 - ☐ d. refrain from removing, hiding, damaging, harming, or mistreating, or disposing of, a household pet.
 - ☐ e. allow the petitioner or a family member or household member of the petitioner acting on his/her behalf to retrieve a household pet.
 - ☒ f. avoid contacting the petitioner or causing any person other than a party's attorney or law enforcement officer to contact the petitioner.
 - ☐ g. Other: (List other specific behavior the petitioner wants the respondent to stop doing.) _____
- ☐ 3. If the temporary restraining order is denied, the petitioner asks the court to schedule an injunction hearing. *If the temporary restraining order is denied, the petitioner is only entitled to an injunction hearing if the petition alleges conduct that is the same as or similar to conduct that is prohibited under §940.32 (stalking); or is the intentional infliction of physical pain, physical injury or illness; or is an intentional impairment of physical condition; or is a violation of §940.225(1), (2) or (3) (sexual assault); or is a violation of §943.01 involving destruction of property that belongs to the individual; or is a threat to engage in the above mentioned behavior.*
4. Issue an injunction against the respondent for four years or the following shorter period: _____
 - ☐ Order the wireless telephone service provider to transfer to the petitioner each telephone number(s) he/she or a minor child in his/her custody uses. The provider will transfer to the petitioner all financial responsibility for and right to the use of any telephone number(s) transferred. (See form CV-437, **Wireless Telephone Transfer Service in Injunction Case.**)
- ☐ 5. Order the injunction, which is in effect for not more than 10 years, if the court finds a substantial risk the respondent may commit 1st or 2nd degree intentional homicide, or 1st, 2nd or 3rd degree sexual assault against the petitioner.
6. If the court grants the injunction, the petitioner requests the court
 - ☐ 1. not order the respondent to surrender his/her firearm(s). OR
 - ☐ 2. order the respondent to surrender and not possess a firearm while the injunction is in effect because the petitioner believes that the respondent may use a firearm to cause physical harm to another or endanger public safety.
- ☐ 7. Direct the sheriff to accompany the petitioner and assist in placing the petitioner in physical possession of his/her residence, if requested.

SERVICE ON RESPONDENT

Before the injunction hearing, it is the petitioner's responsibility to contact the sheriff's office or other process server to verify that the documents were served and proof of service is filed with the Clerk of Circuit Court. The court will not do this for the petitioner. If available in your county, another way to verify if the documents were served is to register with VPO (VINE Protective Order) on its website at www.vinelink.com.

If the respondent cannot be personally served with Temporary Restraining Order and Notice of Injunction Hearing: Harassment (CV-406), the respondent can be served by publication using Publication Notice form (CV-505).

- The petitioner must file with the court an affidavit stating that service of the respondent by the sheriff or a private process server was unsuccessful because the respondent was avoiding service by concealment or otherwise. The petitioner should get this affidavit from the sheriff or private process server.
- The petitioner also must send the Temporary Restraining Order and Notice of Injunction Hearing: Domestic Abuse (CV-403) form to the respondent via mail or facsimile and must provide proof of transmission (e.g. certified mail receipt, affidavit of mailing or faxing). The mailing or sending of a facsimile may be omitted if the post-office address or facsimile number cannot be ascertained with due diligence.

The clerk of circuit court shall forward the temporary restraining order to the sheriff and the sheriff shall assist the petitioner in serving the temporary restraining order.

If a service fee is required by the sheriff under §814.70(1), Wis. Stats., the petitioner shall pay the fee directly to the sheriff. If the court checks box number 3. Under "The Court Orders" section of the Temporary Restraining Order and Notice of Injunction Hearing (CV-406), no service fee is required to be paid to the sheriff.

State of WisconsinCounty of KenoshaSubscribed and sworn to before me on 8.22.18Kelly Williams
Notary Public/Court OfficialKelly Williams
Name Printed or TypedMy commission/term expires: 9.11.18[Redacted]
Petitioner or Person filing on behalf of Petitioner

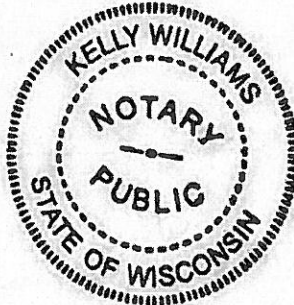
Name Printed or Typed

08/22/2018

Date

DISTRIBUTION:

1. Court
2. Petitioner
3. Person filing on behalf of the Petitioner
4. Respondent
5. Law Enforcement
6. Other: _____



Joe Cardinali is an ~~one~~ acquaintance of mine that I met at a monthly meeting in Kenosha about 8 months ago. I work for a campaign in which the candidate is a member of the Party in which Joe sits on the County Board of. I am also a member of the party. Since meeting, Joe has attempted to take me out to places for drinks, and to engage in sexual behavior. After ~~6~~ months of intimidating me with constant reminders that he has "power" in the community, I asked him not to contact me any longer. He then began instructing "others" in the party to contact my superiors in the campaign (my job) and tell them lies and untruths about me - that I am a "drug addict" and an "alcoholic" of which I am not. He began to contact my employer himself. He today sent me ~~a~~ hostile text messages ~~a~~ stating that he has been "watching" me and will continue to do so until I lose my job. He repeatedly calls, texts, and leaves voicemail on my phone. He approaches/confronts me at events. I have several witnesses to all these actions.

08/22/2018

Signature of Petitioner

Date

Statement of facts

18CV-936

The calls and text messages come at all hours of the day and night. They can be 10-20 calls and texts at a time. A text I received stated that "You need to fuck a young Democrat to even things out". I believe he sent it because he had just learned that my new boyfriend is 63 years old (I am 49). "When are you free to get together one night this week? Maybe even go over things at the office" and "P.s. thinking ^{about} you in that dress has me like (picture of an eggplant)". I never responded to sexual innuendo, but I tried to be polite. He is now calling my boss, making unproven and unsubstantiated claims that I am a drug addict (cocaine) and an alcoholic. He has stated that he and other's are "watching" me and "assuring" me that I will not have my job much longer. Again, he is my Alderman in Somers, Kenosha, and believes he has real influence over people that I work for.

08 / 22 / 2018

Signature of Petitioner

Date