

## **INFORMATION REGARDING FILING A COMPLAINT**

Board of Police and Fire Commissioners  
City of Sheboygan, Wisconsin

If you believe a police officer or firefighter, employed by the City of Sheboygan, Wisconsin, has violated a department rule, city ordinance, state or federal law, or standards of acceptable conduct, you may file a complaint with the President of the Board of Police and Fire Commissioners. Enclosed is a complaint form that can be used for this purpose.

A complaint you file can be based on your personal knowledge of a matter or on information obtained from other sources; please provide the name and address of each source, or otherwise identify the source of your information, such as a document that has information supporting the complaint.

If your charges are made under oath, in the presence of a notary public, the complaint will be treated as a formal complaint; if the complaint form is not notarized, it will be treated as an informal complaint. In either case, the Board will carefully review your complaint. You should be aware that under the provisions of Section 946.32, Wisconsin Statutes, making a false statement under oath or affirmation may be treated as a felony.

Please note that a formal complaint filed with the Board commences an adversarial proceeding, i.e., an administrative lawsuit, in which you are responsible for presenting your case to the Board. The Board does not actively investigate or review your complaint, but sits in judgment much like a court.

If you choose not to use the enclosed form, but wish to make the Board aware of a complaint you have about the actions of a police officer or a firefighter, you may write a letter to the Board detailing your concerns; please cite the rule, ordinance, law or standard of conduct you believe the individual violated. However, the Board cannot initiate a disciplinary action in the absence of a formal complaint.

If you file a complaint with this Board, you may ask that your identity, information you provide, or both be kept confidential. To the extent permitted by state law, the Board will respect your request. However, the Board cannot promise unlimited confidentiality; the news media or any person may ask to see a copy of your complaint and related documents; the Board may be legally required to honor such a request.

Before filing a formal complaint with the Board, you must first file a complaint with the Chief of the Police Department or the Fire Department. Both departments have forms that can be used for this purpose. You also may wish to consult an attorney before filing a complaint with the Board or the department having jurisdiction over the police officer or firefighter involved.

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Mr. Andrew Hopp, President  
Board of Police and Fire Commissioners  
City of Sheboygan  
c/o City Clerk  
828 Center Ave.  
Sheboygan, WI 53081

## COMPLAINT

This complaint is filed pursuant to Section 62.13(5)(b), Wisconsin Statutes, permitting charges to be filed against a police officer or firefighter. Charges against a subordinate may be filed by the chief of a department, by the Board of Police and Fire Commissioners or any of its members, or by an aggrieved person.

## INFORMATION ABOUT PERSON FILING COMPLAINT

Name: Justin Daniels

Address: 723 Suhrke Rd  
Plymouth, WI 53073

Telephone No.: 920-627-1339

Best time(s) to call: Anytime

## INFORMATION ABOUT PERSON NAMED IN THE COMPLAINT

Name: Chris Domagalski

Rank (if known): Chief

Employing Department: ☒ Police ☐ Fire

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## **STATEMENT OF CHARGES**

Describe the action on the part of the person named in this complaint you believe violated a department rule, city ordinance, state or federal law, or standards of acceptable conduct. Use additional sheets if you need more space, initial each and attach them to this form.

See Attached.

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## **SOURCES OF INFORMATION**

If the actions described in the Statement of Charges are based, in whole or in part, on information obtained from other sources, please provide the name and address of each source, or otherwise identify the source of your information, such as a document that has information supporting the complaint.

See Attached.

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## SPECIFICATION OF VIOLATION

Cite the department rule, city ordinance, state or federal law, or standards of acceptable conduct you believe the person named in this complaint violated.

Chief Domagalski violated the following policies:

- Administrative Leave (SPD Policy 1010.8)
- Criminal Investigation (SPD Policy 1010.9)
- Supervisor Responsibilities (SPD Policy 321.3.1)
- Retaliation Prohibited (SPD Policy 1004.3)
- Supervisor Responsibilities (SPD Policy 1010.6.1)

Chief Domagalski violated the following WI State Laws:

- Misconduct in Public Office (946.12(3))
  - Violate Open Records Laws (Wisconsin Stat 19.31-19.39)
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- ☐ I request that my name be kept confidential.
- ☒ I request that my address and telephone number be kept confidential.
- ☐ I request that sources of information provided as part of this complaint be kept confidential.
- ☐ I do not request confidentiality in this matter.

  
Complainant's Signature

4/11/23  
Date Signed



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**VERIFICATION UNDER OATH**

STATE OF WISCONSIN )

) SS.

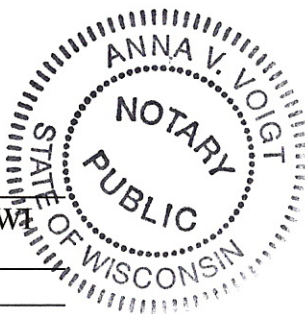
Sheboygan COUNTY )

I, Justin Daniels, the above-named complainant, being duly sworn, on oath depose and state that I have read the foregoing complaint, and that I know it is true and complete to my own knowledge, except as to those matters based upon information and belief, and as to those matters I believe the same to be true.

[Signature]  
Complainant's Signature

Subscribed and sworn to before me this  
11<sup>th</sup> day of April, 2023.

Anna V. Voigt  
Notary Public Sheboygan County, WI  
My commission (is) Notary  
(expires) 8/15/23



## **SOURCES OF INFORMATION**

1. Sheboygan Police Department  
1315 N 23<sup>rd</sup> St  
Sheboygan, WI 53081

Internal Investigations / Policy Manual Online

Case # C21-00937

Case #C21-00983 / Suspension Forms

2. Wisconsin Watch  
P.O. Box 5079  
Milwaukee, WI 53205

Media Releases

3. District Attorney Joel Urmanski  
615 N 6<sup>th</sup> St  
Sheboygan, WI 53081

Brady Letter for Pray

Email Correspondence

4. Department of Workforce Development  
201 E Washington Ave  
Madison, WI 53703

DWD Complaints for Hernandez and Schneider

5. Attorney Tom Kamenick  
1144 Noridge Trail  
Port Washington, WI 53074

Letter demanding Open records release from SPD

6. Hang Lor  
Unknown Address

Statement regarding the Chief laughing at Officer Hernandez

## **STATEMENT OF CHARGES:**

I am personally familiar with all of the information provided in this statement of charges or have gotten it through documents obtained via open records from multiple sources.

From January 2021 to May 2021, an internal investigation took place at Sheboygan PD for sexual harassment in the workplace. Several females came forward with instances of sexual harassment in many forms and wanted Chief Domagalski and his leadership to look into it. This included Officer Hernandez reporting that she had a partially nude photograph taken of her without her consent by Officer Pray. Officer Pray then kept the photograph, without her consent and shared it amongst his peers at SPD without her consent. This is a felony crime and Chief Domagalski did nothing about it.

Chief Domagalski, being the leader of the department, should play a role in how the investigation plays out. The investigation was bungled every step of the process, and Chief Domagalski covered it up, downplayed it, and lied to protect the accused. In total, approximately 10 separate officers were reprimanded in different ways. The two main perpetrators, Officer Pray and Officer Helland, were given small suspensions. I am aware from a Wisconsin Watch article and a DWD complaint filed against the City of Sheboygan by the former HR Director Vicky Schneider, that she felt that the discipline for the officers was inadequate. Vicky was later retaliated against for speaking out against the punishments on how the females were treated, and has pending litigation against the City of Sheboygan, along with a probable cause finding from the state that they retaliated against her.

Chief Domagalski even acknowledged how serious this was, and how light the suspensions were, by stating this in the suspension forms for Officer Pray and Officer Helland:

“Your actions significantly impacted your co-workers and negatively impacted their morale when they became aware of your actions. Your decisions also broke the trust of some of your co-workers resulting in a decrease in the efficiency of the department. The impact your decisions would have on the reputation of the department and community trust if the public became aware of your conduct can not be overstated as our reputation is key to the trust that the public places in us.”

The suspension forms substantiate the charges against Officer Pray and Officer Helland of workplace sexual harassment and other violations as well.

Officer Pray's suspension form in particular confirms sexual harassment, illegally utilizing the TIME system, violating gag orders, requesting nude photos of females on duty, and showing inappropriate photos of coworkers without their consent.

This complaint documents 5 policy violations and likely criminal misconduct that warrants an independent investigation into Chief Domagalski's actions. I am urging the commission to take the first step toward restoring employee and public trust in the Sheboygan Police Department by calling for an independent investigation and terminating Chief Domagalski's employment.

Chief Domagalski Policy Violations:

**SPD Policy 1010.8 – Administrative Leave**

- When a complaint of misconduct is of a serious nature, or when circumstances indicate that allowing the accused to continue to work would adversely affect the mission of the Department, the Chief of Police or the authorized designee may temporarily assign an accused employee to administrative leave. Any employee placed on administrative leave:

Despite serious allegations of sexual harassment, and a felony crime being committed, Officer Pray was never placed on administrative leave throughout this investigation. This is a clear abuse of the Chief's discretion. His own policy states when conduct is of a serious nature, this leave can be used. If you take a look at what the suspension forms say, it's obvious this investigation was of a serious nature. When questioned by the Sheboygan Press/Wisconsin Watch journalists as to why Bryan Pray was never put on admin leave, Chief Domagalski said it just didn't happen and he didn't want to go back and forth about it.

According to the Wisconsin Watch article titled "Widespread sexual harassment draws discipline, resignations in Wisconsin police department", Jim Palmer, the executive director of the Wisconsin Professional Police Association acknowledges that most people "in any employment law setting" would consider placing the subject of such a complaint on administrative leave best practice. Palmer further stated that administrative leave is used to "maintain the integrity of the investigation" and to ensure that "alleged victims rights aren't further abridged in any way". Palmer further stated that the Chief could have placed Officer Hernandez and Officer Pray on different shifts at a minimum to insulate her, but the Chief refused to do that when requested by Officer Hernandez.



Instead, Officer Pray was issued a gag order and violated it several times. His own suspension form notes, "While the investigation was ongoing you communicated to co-workers your frustration with the investigation and what you perceived to be your treatment in comparison to others involved in the investigation in front of other officers that had no knowledge of the investigation." The internal notes he also disparaged Officer Hernandez while she was on leave, stating that it was her fault as well and she deserved to be punished. This too, would have been a moment to place Officer Pray on leave, according to Palmer. It still did not happen, in what was a clear abuse of discretion by Chief Domagalski.

#### **SPD Policy 1010.9 – Criminal Investigation**

- Where a member is accused of potential criminal conduct, a separate supervisor or investigator shall be assigned to investigate the criminal allegations apart from any administrative investigation. Any separate administrative investigation may parallel a criminal investigation.
- The Chief of Police shall be notified as soon as practicable when a member is accused of criminal conduct. The Chief of Police may request a criminal investigation by an outside law enforcement agency. A member accused of criminal conduct shall be provided with all rights afforded to a civilian. The member should not be administratively ordered to provide any information in the criminal investigation. No information or evidence administratively coerced from a member may be provided to anyone involved in conducting the criminal investigation or to any prosecutor. The Sheboygan Police Department may release information concerning the arrest or detention of any member, including an officer, that has not led to a conviction. No disciplinary action should be taken until an independent administrative investigation is conducted.

Officer Hernandez dutifully reported to supervisors at the Sheboygan Police Department that she had a partially nude photograph taken of her by Officer Pray at a training, without her consent. Officer Pray was following her around, harassing her to expose her breasts. It should be noted that this was at night, after the training, in a hotel paid for by the City of Sheboygan. Officer Hernandez was intoxicated (partially due to the intoximeter training they were attending) and Officer Pray was quite obviously preying on her, trying to take advantage of her intoxicated state. He followed her into a private area of the hotel where she was trying to make a call, still harassing her to expose her breasts for him. She ultimately did, to get him away from her.

What she didn't know until the next day, is that Officer Pray took a photograph of her without her consent when she did it. She demanded that Officer Pray delete the photo as soon as she learned of the photo being taken. Officer Pray said he deleted it, but he did not. It was eventually determined by the Sheboygan County District Attorney Joel Urmanski that he lied multiple times in the internal investigation, resulting in a Brady Letter.

Officer Pray's actions constitute a felony, under WI Statute 942.09(2)(am). Officer Pray committed this felony, yet Chief Domagalski again did not follow his own policy and never had a parallel criminal investigation completed. What is worse, is Chief Domagalski never even sent this investigation to DA Urmanski for review once the internal was over.

SPD policy clearly states that an investigation can be done by an outside agency. Jim Palmer, Executive Director of WPPA stated that "Anytime there's potential for unlawful conduct", "it's very common for agencies to call in another outside agency". Sheboygan PD did not do this either. This was another blatant attempt to control the narrative and protect Officer Pray and others by Chief Domagalski.

#### **SPD Policy 321.3.1 – Supervisor Responsibilities**

- Supervisors and managers are required to follow all policies and procedures and may be subject to discipline for:
  - o Failure to be reasonably aware of the performance of their subordinates or to provide appropriate guidance and control.

Per policy, Chief Domagalski failed to be reasonably aware of the performance of his subordinates or to provide appropriate guidance. He is the leader of SPD and he had an internal investigation spanning to around 30 officers being interviewed. This is almost half of your patrol officers. To have such a wide ranging investigation into sexual harassment strongly suggests a negative and harmful culture that starts with Chief Domagalski.

Chief Domagalski was so negligent and so unaware of the sexual harassment in his department that when he finally was forced by circumstances to conduct an investigation, the investigation necessarily involved almost half of his officers. That the sexual harassment had become so widespread strongly indicates at best that Chief Domagalski was oblivious to the problem and failing to provide appropriate guidance to his department. At worst, the prevalence of these destructive attitudes and actions suggests



that Chief Domagalski was turning a blind eye to the unacceptable behavior, allowing a culture of abuse to become the norm.

Evidence of Chief Domagalski's own retaliation against the women, discussed later in this document, is further evidence of leadership that fosters and encourages a culture of sexual harassment and abuse.

#### **SPD Policy 1004.3 – Retaliation Prohibited**

- No member may retaliate against any person for engaging in lawful or otherwise permitted behavior; for opposing a practice believed to be unlawful, unethical, discriminatory or retaliatory; for reporting or making a complaint under this policy; or for participating in any investigation related to a complaint under this or any other policy. Retaliation includes any adverse action or conduct, including but not limited to:
  - o Shunning or unreasonably avoiding a person because he/she has engaged in protected activity.

After Officer Hernandez filed a complaint on Officer Pray, she was treated unfairly and unethically by SPD leadership. Chief Domagalski failed to provide her any protection from the Officer Pray, and in fact he denied several requests, including a very reasonable request of she and Officer Pray being on different shifts to mitigate any further chance of her being harassed or retaliated against.

Instead, Chief Domagalski and other administrators gave Officer Pray flimsy no contacts with Officer Hernandez and gag orders. When Officer Pray violated gag orders, they did nothing about it other than to warn him not to do it again.

When Officer Pray violated the no contact order, Officer Hernandez texted her supervisor, Lt Teunissen and he merely responded "Stay positive have a nice shift". Nothing else came of these instances. She was clearly being shunned and the continuing harassment of her by Officer Pray was disregarded by SPD. Chief Domagalski had the ability at any time to assist her or place Officer Pray on leave, which is what his policies call for. Instead, because of Chief Domagalski's inaction, Officer Hernandez was forced to take leave while the investigation played out.

The one time Chief Domagalski spoke to Officer Hernandez in this process, he laughed in her face. He thought it was funny how confident Officer Pray is, and stated that his confidence got him so far in life.

While the internal investigation was ongoing, Chief Domagalski also allowed Officer Pray to appear on Facebook for Black History Month on the SPD page. He allowed Officer Pray to partake in a Sheboygan

Beacon story that glorified Officer Pray. Lastly, Officer Pray was given an award at the yearly SPD Banquet, all while being investigated for sexual harassment and committing a felony crime on duty. The recognition Chief Domagalski continued to give Officer Pray was retaliation against Officer Hernandez and the Chief was clearly showing that her complaint did not matter.

Per Wisconsin Watch article titled, "Widespread sexual harassment draws discipline, resignations in Wisconsin police department", multiple women involved in this internal were blamed by Chief Domagalski and his administration for their own victimization. It notes that although the investigations showed both male and female officers misused their phones on duty, only the women were stripped of their abilities to use their phones at work. The males were not. It notes that Chief Domagalski overruled his Captain's recommendations that Officer Pray and Officer Helland attend sexual harassment training. In true form and against all common sense, Chief Domagalski required two female officers to attend sexual harassment training, even though they hadn't violated the policy. This is another clear example of Chief Domagalski retaliating against the women that spoke out.

#### **SPD Policy 1010.6.1 – Supervisor Responsibilities**

- In general, the primary responsibility for the investigation of a personnel complaint shall rest with the member's immediate supervisor, unless the supervisor is the complainant, or the supervisor is the ultimate decision-maker regarding disciplinary action or has any personal involvement regarding the alleged misconduct. The Chief of Police or the authorized designee may direct that another supervisor or Division Captain personnel investigate any complaint. A supervisor who becomes aware of alleged misconduct shall take reasonable steps to prevent aggravation of the situation. The responsibilities of supervisors include, but are not limited to:
  - o (b) Responding to all complaints in a courteous and professional manner.
  - o (e) Promptly contacting the Department of Human Resources and the Shift Lieutenant for direction regarding their roles in addressing a complaint that relates to sexual, racial, ethnic or other forms of prohibited harassment or discrimination.

As previously discussed, Chief Domagalski did not treat Officer Hernandez courteously and in a professional manner. In fact, he laughed at her the only time he spoke to her. Officer Hernandez had Officer Hang Lor with her when the Chief laughed at her. This made Officer Hang Lor so uncomfortable



that he asked the Chief to not treat her like that, as she had been through enough. The Chief did not deny this complaint in media reports, but disagreed with the characterization. He did not provide her with any options to have the complaint handled seriously or protect her from Officer Pray. At no time did Chief Domagalski ever get the HR Director at that time, Vicky Schneider, involved in the serious investigation. This was, of course, contrary to his own policies. Former HR Director Vicky Schneider confirms this in her DWD complaint, by stating that she did not have the full spectrum of the complaint until late July 2021, or 2 months after the investigation was already completed.

Chief Domagalski crimes:

**946.12 Misconduct in Public Office.** Any public officer or public employee who does any of the following is guilty of a Class I Felony:

(3) Whether by act of commission or omission, in the officer's or employee's capacity as such officer or employee exercises a discretionary power in a manner inconsistent with the duties of the officer's or employee's office or employment or the rights of others and with intent to obtain a dishonest advantage for the officer or employee or another; or

Part of the crime Chief Domagalski has committed, encompasses all of the policies he violated to protect Officer Bryan Pray and others, while not holding them accountable. Officer Bryan Pray should have lost his job and would have lost his job at any other police department. Officer Pray violated many serious policies, all while committing a felony. The Chief lied about these things and covered it up, so Officer Pray could stay employed, thus creating a dishonest advantage for another, while abusing his own discretion. I will try to cover other acts at this point, not related to policy violations.

Chief Domagalski deliberately covered up a crime committed by Officer Pray against Officer Hernandez. Officer Pray committed the felony crime of:

**942.09 Representations depicting nudity.**

**(2)(am)** Except as provided in par. (dr), whoever does any of the following is guilty of a Class I Felony:

1. Captures an intimate representation without the consent of the person depicted under circumstances in which he or she has a reasonable expectation of privacy, if the person knows or has reason to know that the person who is depicted does not consent to the capture of the intimate representation.

3. Possesses, distributes, or exhibits an intimate representation that was captured in violation of subd. 1. Or a reproduction made in violation of subd. 2., if the person knows or has reason to know that the intimate representation was captured in violation of subd. 1. Or the reproduction was made in violation of subd.2., and if the person who is depicted in the intimate representation or reproduction did not consent to the possession, distribution, or exhibition.

Sheboygan PD's own investigator, Lieutenant Teunissen found that Officer Pray took a intimate, partially nude photograph of Officer Hernandez without her consent. I will quote from SPD Internal Report, Case #C21-00937. On Page 26 of 31, Lt Teunissen of the Sheboygan PD notes in his conclusionary report, "OFCR 8 (Hernandez) alleges that OFCR Bryan Pray, without her knowledge, took a photograph of her exposing her breasts to him. This investigation proves that this actually occurred".

Despite the findings of SPD's own Investigator, Captain Jim Veaser and Chief Domagalaski independently decided that Officer Hernandez consented to the picture being taken of her. They came to this conclusion with absolutely no evidence supporting it.

It should be noted that Captain Veaser did not do the investigation, he was basing his opinions on his own personal beliefs and narratives. The only information Chief Domagalaski and Captain Veaser have to support their belief is Officer Pray's statements. We know Officer Pray is a liar, and it is proven by the Brady Letter. Your Police Chief and a Captain took a liar's word over a female victim and created their own narrative. This is proven in Captain Veasers report, page 128/129 of Case #C21-00983. Captain Veaser notes "In both cases, OFCR 1 and OFCR 8 voluntarily took or participated in the production of photos themselves." He further concludes on page 129 that Officer Hernandez allowed Officer Pray to take a photo of her. This is not based on any type of factual information. Furthermore, Captain Veaser states in his report, page 156, "Completely advising of the facts was occasionally an issue during Officer Pray's interviews, it is believed that the facts are known now. He explained that he was overwhelmed when questioned and couldn't remember the details." This is clearly a watered-down way to admit that Officer Pray lied during his interviews. Despite Captain Veaser acknowledging Officer Pray is a liar, he and Chief Domagalaski still take his word and create their own narrative. This is dangerous to create



something they want, based on what they want. What if your police officers are creating criminal charges against your citizens because they want to?

The story they took as fact was likely well beyond the 3<sup>rd</sup> or 4<sup>th</sup> version of events that Officer Pray provided. Officer Hernandez gave the same version of events throughout the entire process. Simply put, they took a liars word over a victim, and protected the liar. Chief Domagalski even told a journalist that it is "clear" that consent was given, which there simply is no evidence of. This follows the pattern of lies and cover ups by Chief Domagalski and his administration.

Officer Hernandez sought out a private area of the hotel to make a private phone call. Officer Pray followed her to that area and was successful in getting an intoxicated female to lift her shirt. He took a photo of it, without her consent, possessed it without her consent, and shared it in the workplace without her consent. This is one felony crime at a minimum, likely two. Chief Domagalski never allowed a criminal investigation into this, contrary to his own policies and never forwarded the internal reports to the District Attorney for Review.

On February 7, 2022, I spoke with DA Urmanski over the phone regarding this issue. I told him that Chief Domagalski had covered up a crime and was covering for atleast one lying police officer, possibly more. I urged him to get the internal investigation for review. This was 9 months after the investigation had concluded. DA Urmanski informed me that he would get the reports "as soon as we got off the phone". He told me he requested the internal investigation from Chief Domagalski on that same day. I also completed an open records request with Sheboygan PD on February 14, 2022 to obtain the internal investigation related to these events. After not hearing back from DA Urmanski, I submitted a letter in writing to the DA requesting he order the release of the records from SPD. This was on March 25, 2022.

DA Urmanski did not get the internal documents from Chief Domagalski until November 2022, or 9 months after he requested the reports. Why is that? I also received my records in November 2022, only after hiring an Attorney to force the release of these records, as Chief Domagalski and SPD were breaking the law by not releasing them. After my initial request on February 14, 2022, I followed up with Sheboygan PD on March 7, 2022, April 20, 2022, and June 20, 2022. Each time, Cassandra Wohlgemuth (Chief Domagalski's Asst) stated that they were "working on it" and hope to get it to me shortly.

Attorney Tom Kamenick from the Wisconsin Transparency Project wrote a letter for me to SPD demanding the release. He notes that when I checked in on 4/20/22 specifically, Cassandra stated "I've

checked in with the Chief, and we are continuing to work on your request. We hope to have it to completed soon". He further notes that the Chiefs 8 month delay is completely unacceptable. He was failing his legal responsibility to provide records "as soon as practicable and without delay". The Wisconsin Attorney General, who is charged with interpreting and enforcing the Open Records Law, has opined that ten business days is a reasonable amount of time to fulfill most record requests. I will provide a copy of this letter to you.

I also was able to obtain, via open records from DA Urmanski, emails between Chief Domagalski and DA Urmanski. Here is a summary of the emails. I will provide you a copy.

On 3/17/22, DA Urmanski emails Chief Domagalski that he received an inquiry today from a public safety officer asking whether another officer was on the Brady/Giglio list. The Brady list is a list for Law Enforcement Officers who are proven liars and have credibility issues. DA Urmanski further tells the Chief that he has not received the report(s) about the officer yet, but that they talked about him briefly a few weeks ago. He asks the Chief if he can get the reports. It does not appear that the Chief responds. On 3/27/22, 10 days later, DA Urmanski emails Chief Domagalski once again. He tells the Chief he has not received the reports he requested. He said that since sending the email on 3/17/22, he received a letter questioning a denial of access under open records for one of the reports. They email back and forth briefly and set up a meeting to discuss.

On 5/31/22, now three months after DA Urmanski requested the reports from Chief Domagalski, DA Urmanski sends another email. He tells the Chief he still has not gotten the reports he has asked for concerning Officer Pray. He stated that he received another communication on the matter today. DA Urmanski then states, "I know from our prior discussion(s) the Department is of the opinion that there are no Brady issues to address. However, as I have shared, I want to review the reports to complete my obligations. I understand that the reports are 200+ pages, but I need to see these reports. Please let me know when they can be ready for my review. I will be happy to pick them up from the Department". This email clearly shows that the Chief is not cooperating with DA Urmanski's requests to review these reports for potential Brady violations or crimes. Chief Domagalski knows or should know that Officer Pray lied several different times, as it is made abundantly clear in his own internal investigation by his own investigators. Chief Domagalski is either lying about Officer Pray's lies to DA Urmanski or he is grossly incompetent.



January 11, 2023, DA Urmanski emails Chief Domagalski with a Brady Letter for Officer Pray. I have obtained a copy of Officer Pray's Brady Letter and will provide a copy. It notes that DA Urmanski reviewed the same reports that I have, likely unredacted. These are the same reports that Chief Domagalski made his determinations from. DA Urmanski also noted transcripts related to the reports and concluded that there is a Brady issue for Officer Pray. He notes that he received the bulk of his reports from Chief Domagalski on November 4, 2022 after initially requesting them February 7, 2022 or 9 months later. He notes his determination comes from statements Officer Pray made to supervisors concerning a photo he took and possessed, specifically whether he showed anyone else the photo and when he deleted it.

DA Urmanski was able to make this determination that Officer Pray lied by reviewing the reports and transcripts. Why was Chief Domagalski not able to make that determination in the 20 months prior, after the investigation was completed? In fact, Chief Domagalski somehow concluded exactly the opposite, in that Officer Pray did not lie. This was not a "mistake". This was by design, calculated, and very meticulous. This was a cover up from the start. A Police Officer with 30+ years of experience should be able to identify a lie. Chief Domagalski covered this up and is lying himself.

As a result of this cover up, the City of Sheboygan has already paid out one settlement agreement to a former employee. Former HR Director Vicky Schneider has pending action against the City as well, because of her stance against how this was handled. She suffered retaliation from City and SPD leadership for standing against sexual harassment in the workplace. Then City Administrator Todd Wolf has also been fired, likely somewhat due to this circumstance as well, and he has pending litigation as well. This all was caused because of Chief Domagalski's cover up. Chief Domagalski is the root of all this litigation against the City of Sheboygan.

### **PFC & Hiring Practices**

As you all are aware, Bob Lettre served on the Police and Fire Commission for a long time until he was removed from his post in the Summer of 2022. Bob had been communicating with me directly regarding these issues. Bob was trying to help me uncover the issues, crimes, and lies that were overtaking the Sheboygan Police Department and destroying morale for patrol officers. Bob told me several times that in his very few conversations with Chief Domagalski and Mayor Sorenson regarding these issues, they were more concerned about burying it, than dealing with it. Bob states he was told that he would be renewed for his position on the PFC, until Chief Domagalski told Mayor Sorenson that he no longer

wanted Bob there. Chief Domagalaski was aware that Bob had been speaking to me, and I believe strongly this is the reason why he was not renewed.

I am aware from both current and former employees of the Sheboygan Police Department, that Chief Domagalaski and former Captain Cobb, at a minimum, have been engaged in a pattern of withholding information from the PFC when trying to hire police candidates. For these employees' safety, I cannot name them. SPD administration, including Chief Domagalaski, have shown a pattern of retaliation against people who speak out.

I have been told by multiple people with knowledge of the pre-employment background investigation that Officer Pray had engaged in criminal sexual conduct as a minor. He was also investigated for a sexual assault while in college. My understanding is that this information was withheld from the PFC, as they feared Officer Pray would not get hired if you guys had all of the information. This is despicable, to say the least. I challenge and urge you to request this information from Chief Domagalaski as you deserve to know who you hired, and the full truth behind Chief Domagalaski's antics.

I am also aware of them hiding gang affiliations from you with a previous hire. This hire was Lorenzo Backhaus. I was a police officer at the time, and saw the gang flag in his files. They hired him anyways, despite many officers expressing concern. I believe he was later allowed to resign. He was involved in a sexual assault investigation in Grand Chute, WI while at the police academy. Grand Chute PD has acknowledged the existence of a report, but they refuse to release it. I don't believe Chief Domagalaski or Captain Cobb ever made you aware of this scenario. Lorenzo's gang affiliation was also deleted from in house records prior to his hiring, and they withheld that information from you to get him hired.

Bob Lettre informed me that you were never told of Officer Pray's alleged sexual misconduct or Backhaus's gang affiliations. I challenge you to ask Chief Domagalaski direct questions regarding this as well.

In closing, I have presented to you many policy violations that Chief Domagalaski has engaged in. These policy violations are backed up either by internal reports, personal knowledge, or media releases. He violated all these policies in an effort to protect Officer Pray and other male officers, while retaliating against several female victims. Chief Domagalaski possessed information for almost 20 months that Officer Pray had lied under Garrity (under oath) in an internal investigation, and that he had committed a felony. Chief Domagalaski abused his discretion by not turning over Brady material to the District Attorney. He likely will argue that Brady determinations are not made by him. Don't let this fool you. This

is correct, however, he clearly understands what Brady is, as he is a Chief of Police. If he doesn't, he is incompetent. It is his job to relay any potential Brady material to the District Attorney, as the DA by law, needs to reveal any potential Brady Material to the Defense for any criminal trial.

Chief Domagalski lied to the District Attorney by telling him that the investigation had no Brady material. Chief Domagalski lied to the media that it was "clear" that Officer Hernandez gave consent to have her photo taken. Chief Domagalski lies repeatedly to the Police and Fire Commission. Chief Domagalski engaged in a criminal cover up. While doing so, Chief Domagalski violated many SPD policies in an effort to protect a sexual abuser that likely shouldn't have been hired in the first place, if he was honest with all of you.

Even if you do not concur that Chief Domagalski's coverup warrants a criminal outside investigation, the facts are clear that his conduct was incompetent, unprofessional, and unethical.

For all of the reasons listed in this complaint, I demand Chief Domagalski immediately be removed from his position of Chief of Police and fired from the Sheboygan Police Department to restore legitimacy to the amazing men and women that still work there, and are suffering under Chief Domagalski's lack of leadership. I also request you seek an independent criminal investigation into his conduct.

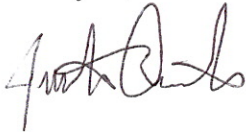


Dear PFC President Andy Hopp:

After reviewing the procedures on this hearing, my understanding is that you are able to compel appearances via subpoena for witnesses. I would like the following people to be issued a subpoena if possible. If there are any issues, or if you need me to write a summary as to why each witness would be important or relatable to the complaint I have filed, please let me know and I can provide that. All of these people either were part of the investigation, have direct knowledge of the Chief's involvement, or need to be questioned further to provide further evidence of my complaint.

1. Mayor Ryan Sorenson of Sheboygan
2. Former City Administrator Todd Wolf
3. Lieutenant Doug Teunissen of the Sheboygan Police Dept
4. Sergeant Alex Jaeger of the Sheboygan Police Dept
5. Captain James Veaser of the Sheboygan Police Dept

Thank you,

A handwritten signature in black ink, appearing to read "Justin Daniels", written in a cursive style.

Justin Daniels