

**STATE OF WISCONSIN**

**CIRCUIT COURT**

**RACINE COUNTY**

STATE OF WISCONSIN

Plaintiff,

vs.

JACQUELINE M HEIDT

DOB: 06/24/1985

Sex/Race: F/W

Eye Color: Brown

Hair Color: Brown

Height: 5 ft 6 in

Weight: 220 lbs

Alias: Also Known As Jackie Heidt

Also Known As Jacqueline M Berres

Also Known As Jacqueline Marie

Heidt

Defendant.

**CRIMINAL COMPLAINT**

DA Case No.: 2022RA006880

Assigned DA/ADA:

Agency Case No.: 22-047644

Court Case No.: 2022CF

ATN: 52003001234419

*For Official Use*

Status: Prisoner on Monday, August 29, 2022 at 1:30 PM  
Officer: Susan Conley # 8855, of the Racine County Sheriff

**The defendant did:**

**Count 1: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with Travis D Jones who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 2: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with Travis D Jones who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 3: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with VICTIM who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon

conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 4: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with VICTIM who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 5: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with Travis D Jones who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 6: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with Travis D Jones who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 7: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with Travis D Jones who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 8: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with Travis D Jones who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 9: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or

sexual intercourse with Travis D Jones who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 10: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with Travis D Jones who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 11: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with Travis D Jones who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 12: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with Travis D Jones who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 13: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with Travis D Jones who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 14: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with Travis D Jones who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 15: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with Travis D Jones who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 16: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with Travis D Jones who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 17: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with Travis D Jones who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 18: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with Travis D Jones who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 19: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with Travis D Jones who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 20: 2ND DEGREE SEXUAL ASSAULT BY CORRECTIONAL STAFF**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as a correctional staff member, have sexual contact or sexual intercourse with Travis D Jones who was confined in a correctional institution, Racine Correctional Institution, contrary to sec. 940.225(2)(h), 939.50(3)(c) Wis. Stats., a Class C Felony, and

upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 21: DELIVER ILLEGAL ARTICLES TO INMATE**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, did, as an officer or other person, contrary to the rules or regulations and without the knowledge or permission of the sheriff or other keeper of the jail, in the case of a jail, or the warden or superintendent of the prison, in the case of a prison, delivered, procured to be delivered, or had in their possession with intent to deliver to any inmate confined in a jail or state prison, any article or thing whatever, with intent that any inmate confined in the jail or prison shall obtain or receive the same, contrary to sec. 302.095(2)(a)1, 939.50(3)(i) Wis. Stats., a Class I Felony, and upon conviction 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.

**Count 22: MISCONDUCT IN PUBLIC OFFICE - EXCESS AUTHORITY**

The above-named defendant on or between March 1, 2022 and August 4, 2022, in the Village of Sturtevant, Racine County, Wisconsin, unlawfully, intentionally, and feloniously, in the officer's or employee's capacity as such officer or employee, does an act which the officer or employee knows is in excess of the officer's or employee's lawful authority or which the officer or employee knows the officer or employee is forbidden by law to do in the officer's or employee's official capacity, contrary to sec. 946.12(2), 939.50(3)(i) Wis. Stats., a Class I Felony, and upon conviction 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.

The official records and files of the Racine County District Attorney's Office, the Wisconsin Department of Justice and/or Department of Transportation reflect that the defendant has the following record of convictions:

The complainant, being first duly sworn on oath, on information and belief, alleges and states that in the County of Racine, State of Wisconsin, the defendant did commit the above described offense(s) and prays that said defendant be dealt with according to the laws of the State of Wisconsin.

The complainant states that he is an adult citizen and has reviewed the official law enforcement reports prepared under the above mentioned complaint numbers by the above stated officer, whose reports your complainant relies upon as truthful and accurate inasmuch as they were prepared during the course of an official law enforcement investigation. The complainant relies upon the statements of the mentioned witnesses inasmuch as they are citizens and their statements are based on personal knowledge or eyewitness observations; the complainant relies upon the statements of the defendant, if any, inasmuch as they are contrary to the defendant's penal interests and are, therefore, to be believed.

**The complainant thereby informs the court that the basis for the above charge(s) is as follows:**

Inv. Srnka, of the Racine County Sheriff's Office, reports that on August 24, 2022, he was advised of allegations of an inappropriate relationship between a Racine Correctional Institution (RCI) sergeant, identified as Jacqueline HEIDT, and an RCI inmate, identified as TDJ. RCI is located at 2019 Wisconsin Street, Village of Sturtevant, County of Racine, State of Wisconsin.



Inv. Srnka was advised by Department of Corrections Internal Affairs that HEIDT was accused of not only having sexual intercourse with an RCI inmate, TDJ, but also providing him with contraband, and that HEIDT might also be pregnant with TDJ's child. The contraband referenced was a cellular phone found on TDJ's person on August 18, 2022, while TDJ was suffering from an apparent drug overdose. TDJ was transported to the hospital where the mentioned phone was located in his shorts near his groin area. Alleged nude photographs of HEIDT were contained on the phone as well as text conversations between HEIDT and TDJ. Inv. Srnka was also advised that the DOC had recorded conversations between HEIDT and TDJ from the prison phone system that appeared to be sexual in nature.

Inv. Srnka then conducted an interview of the alleged victim, TDJ, at RCI. TDJ was read his Miranda Warnings and he agreed to speak with investigators. TDJ stated that his sexual relationship with HEIDT began in April of 2022, and that their last sexual encounter was on August 4, 2022. TDJ stated these sexual encounters occurred in HEIDT's office at RCI and that they occurred approximately 3-4 times a week. These sexual encounters included approximately 15 instances of fellatio and approximately 2 instances of cunnilingus. TDJ also stated that he and HEIDT had penis to vagina intercourse more than 20 times in her office, but less than 40. TDJ was clear that this was a romantic relationship and the sexual contact was not forced on him by HEIDT or on her by him.

When asked about any tattoos or marks on HEIDT's body, TDJ described a birthmark the size of a "50 cent piece" that he described as being "between her ass crack." He stated he would see it when they were having "doggy style sex." Further TDJ stated HEIDT did not have any tattoos, but did state she had "distinctive nipples" and described them as being large to officers.

TDJ also stated that the cellphone found on his person on August 18, 2022, was provided by HEIDT when TDJ was in segregation at RCI. TDJ stated that HEIDT told him she couldn't go that long without talking with him and provided him with the phone and several batteries so the phone would not go dead. During this time frame TDJ stated he and HEIDT mostly text to preserve his phone battery. TDJ stated he received the phone from HEIDT sometime between March 2022 and June 2022.

TDJ also stated HEIDT sent nude photos of herself as well as photos of HEIDT and her children. TDJ was able to describe features of HEIDT's house that he saw in the pictures and was able to provide the names of HEIDT's children and husband, identified as JH. TDJ was also able to provide information on where HEIDT lived.

TDJ stated that he and HEIDT did not use protection when engaged in sexual intercourse and that HEIDT informed him that she was pregnant with his child. HEIDT began sending TDJ photos of ultrasounds and pictures of the doctor's office. HEIDT informed TDJ that she wanted to have his baby.

TDJ then stated the last time he spoke with HEIDT was on her burner phone the previous Sunday and provided the "burner phone" number to Inv. Srnka.

Investigators later were able to look through TDJ's phone and observed three photos of a woman's exposed vagina, as well as two photos of HEIDT and one of her children. The messages containing these photos all came from the same phone number. Messages also existed on the phone from the number provided to officers telling TDJ to wipe his phone and to throw the batteries away.

An interview was then conducted with HEIDT who was read her Miranda Warnings and initially agreed to speak with officers. Initially, HEIDT denied all allegations, said she never had sex with an inmate or brought anything into the jail. Further, HEIDT stated that she thought this was all just retaliation by inmates. HEIDT also stated that she did not have any birthmarks on her buttocks and that she was not pregnant. When the evidence located on TDJ's phone was brought to her attention as well

as recordings of her phone calls to TDJ on the prison phone system, HEIDT's demeanor changed and HEIDT stopped answering questions.

An interview was also conducted with HEIDT's husband, JH, at HEIDT's residence. While at the residence, Inv. Srnka reports he was able to observe features of the house that exactly matched TDJ's descriptions. When JH was asked if HEIDT had any birthmarks, he confirmed she had a birthmark between her "buttcheeks" and also confirmed that HEIDT had larger nipples as described by TDJ. Further, JH stated that HEIDT was pregnant but she wasn't pregnant anymore, that she had gone to a clinic for a medical procedure that stopped the pregnancy.

On August 26, 2022, Inv. Srnka obtained two warrants for the case, one for a visual examination of HEIDT's body to verify the descriptions provided by TDJ, and one for a search of HEIDT's van.

The warrants were executed and upon visual inspection of HEIDT at the Racine County Jail, investigators were able to observe and photograph the mentioned birthmark on HEIDT's buttocks. Further, HEIDT's nipples matched the description provided by TDJ.

During the search of HEIDT's van, investigators located a black flip phone with the phone number provided by TDJ. The pin to unlock this phone was also TDJ's birthday. The phone was also the same make and model as the phone provided to TDJ at RCI. Within the phone, investigators observed photos of TDJ, a photo of a penis (believed to be TDJ), and the same text messaging threads also present on TDJ's phone. Photos of TDJ in his prison uniform were also located on the device.

Subscribed and sworn to before me on 08/29/22  
Electronically Signed By:  
Kelly A Larsen  
Assistant District Attorney  
State Bar #: 1097725

Electronically Signed By:  
ADA Jacob Garman  
Complainant