

**FILED**  
**07-19-2022**  
**Clerk of Circuit Court**  
**Kenosha County**  
**2022CF000983**  
**Honorable Anthony**  
**Milisauskas**  
**Branch 4**

**STATE OF WISCONSIN                      CIRCUIT COURT                      KENOSHA COUNTY**

STATE OF WISCONSIN

Plaintiff,

vs.

JOHN STEINBRINK JR

██████████  
 Kenosha, WI 53142

DOB: 05/29/1969

Sex/Race: M/W

Eye Color: Brown

Hair Color: Brown

Height: 6 ft 05 in

Weight: 240 lbs

Alias: Also Known As John Peter  
 Steinbrink

Also Known As John P Steinbrink  
 Defendant.

**CRIMINAL COMPLAINT**

DA Case No.: 2022RA003418  
 Assigned DA/ADA: Christopher D  
 Steenrod  
 Agency Case No.: 22-021092  
 Court Case No.: 2022CF  
 ATN:

*For Official Use*

Status: Summons for Wednesday, August 10, 2022 at 1:00 PM

Citation:

Officer: Tommy L Sharrett # 9822, of the Racine County Sheriff

**The defendant did:**

**Count 1: THEFT - FALSE REPRESENTATION (> \$10,000 - \$100,000)**

The above-named defendant on or about 02/03/2020, in the Village of Pleasant Prairie, Kenosha County, Wisconsin, did obtain title to property of Bain Station Investments, having a value greater than \$10,000 but does not exceed \$100,000, by intentionally deceiving the person with a false representation which he knew to be false, made with intent to defraud and which defrauded the person, contrary to sec. 943.20(1)(d) and (3)(c), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

**Count 2: MISCONDUCT IN PUBLIC OFFICE - EXCESS AUTHORITY**

The above-named defendant on or about 11/02/2021, in the Village of Pleasant Prairie, Kenosha 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.

**Count 3: MISCONDUCT IN PUBLIC OFFICE - EXCESS AUTHORITY**

The above-named defendant on or about 02/04/2022, in the Village of Pleasant Prairie, Kenosha 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

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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.

**Count 4: MISCONDUCT IN PUBLIC OFFICE - EXCESS AUTHORITY**

The above-named defendant on or about 02/03/2022, in the Village of Pleasant Prairie, Kenosha 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.

**Count 5: MISCONDUCT IN PUBLIC OFFICE - EXCESS AUTHORITY**

The above-named defendant on or about 08/19/2020, in the Village of Pleasant Prairie, Kenosha 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.

**Count 6: MISCONDUCT IN PUBLIC OFFICE - EXCESS AUTHORITY**

The above-named defendant on or about 01/19/2021, in the Village of Pleasant Prairie, Kenosha 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.

**Count 7: MISCONDUCT IN PUBLIC OFFICE - EXCESS AUTHORITY**

The above-named defendant on or about 03/03/2020, in the Village of Pleasant Prairie, Kenosha 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 Kenosha 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:

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The complainant, being first duly sworn on oath, on information and belief, alleges and states that in the County of Kenosha, 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:**

On April 4, 2022, Captain Ollila of the Pleasant Prairie Police Department learned that MS, a former Department of Public Works (DPW) employee, had made several concerning complaints against John Steinbrink Jr, DPW Director for the Village of Pleasant Prairie (the Village). The DPW is located at 8600 Green Bay Rd in the Village of Pleasant Prairie, Kenosha County, Wisconsin and all allegations occurred within the Village of Pleasant Prairie. Capt Ollila interviewed MS on April 4, 2022. Capt Ollila also interviewed TH, RG and KM before it was determined that an outside agency should conduct further investigation. Inv Tommy Sharrett of the Racine County Sheriff's Office was eventually assigned the case for further follow up and investigated the following instances of misconduct: that Steinbrink Jr had ordered DPW employees to perform repairs on a dump truck and wood chipper that were set to go to auction, with both items ending up in Steinbrink's possession; that Steinbrink Jr had ordered DPW employees to install a gate, culvert and access drive to property owned by the Steinbrink family in conjunction with the Bain Station Rd paving project; that Steinbrink Jr used on-duty DPW employees assist him with concrete work at his personal residence; that Steinbrink Jr ordered employees to forge required documentation; and that Steinbrink Jr was involved with the improper abandonment of the Laddish Well.

#### Dump Truck Purchased by Steinbrink Jr Repaired With Village Funds

MS explained that the Village uses JJ Kane and Auctioneers to sell old equipment that the Village is looking to sell. MS explained that the Village decided to sell a 2000 Ford Sterling L8500 Dump Truck. The truck was scheduled to be sold at auction in the late summer of 2021. Documents show that the truck was released to JJ Kane on August 21, 2021 for the sum of \$7,500 with a \$300 commission; however, the truck remained at DPW pending completion of the auction. AS from Louisiana initially purchased the truck; however, the the sale fell through on October 1, 2021 and the truck remained at DPW.

Steinbrink Jr purchased the truck for \$14,050 on November 2, 2021. Inv Sharrett learned that Steinbrink Jr had ordered that Village employees perform repairs on the after he had purchased it. Inv Sharrett also learned that Village equipment is sold "as is" at auction and he confirmed this practice with Racine County fleet services. TH stated that he was contacted by Steinbrink Jr who stated, "We shouldn't be selling stuff out like this" and ordered that work be done on the truck. TH, following Steinbrink Jr's orders, had Village employees conduct repairs on the truck. The truck's plow was removed, the trucks brakes and tires were replaced, and the bed was removed. The repairs were documented in DPW's electronic records system.

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### Wood Chipper Purchased by Steinbrink Jr's Live-in Girlfriend

Inv Sharrett learned that the Village owned two wood chippers. One of the wood chippers was a 2005 model and the other was a 1993 model, which was costly and frequently needed repairs. Steinbrink Jr was able to obtain funding to purchase a brand new wood chipper. Steinbrink Jr's request stated "The village currently has 2 wood chippers. One of them is 25 years old and undersized for the work that we do. We would like to purchase a newer chipper to help crews in the filed clean up after storm events in a timely manner." The newer wood chipper was purchased by the Village. Steinbrink Jr asked TH which wood chipper was going to be sold and TH told Steinbrink Jr that the oldest wood chipper was going to be sold. TH reports that Steinbrink Jr said "No, I want that one." Referring to the 2005 wood chipper.

TH further reports that Steinbrink Jr stated that he, Steinbrink Jr, would handle the auction for the 2005 wood chipper and told TH to have the mechanics replace the blades, chains and some other components to have the unit ready to go. TH reports that Steinbrink Jr had never handled selling an item at auction and that handling auctions fell under TH's responsibilities. TH reports that the last he heard about the wood chipper is when the Village received a check for approximately \$2000 from JJ Kane; however, TH estimated that wood chipper could have sold for much more.

Steinbrink Jr confirmed that he told the auction company that he was interested in the 2005 wood chipper. Steinbrink Jr states that he was told he could do a "direct purchase" of the wood chipper. Steinbrink Jr states that he was told the wood chipper would cost between \$750 and \$1,500. Prices for comparable products were reviewed and Steinbrink Jr offered to pay fifty percent more than the estimate. Steinbrink Jr then had his girlfriend purchase the wood chipper. When asked why his girlfriend purchased the wood chipper, he stated, "Well, she started to get in the business, and honestly, I really didn't want to have my name on it." Steinbrink Jr was referring to his tree cutting business. When asked why he handled the auction for the wood chipper, Steinbrink Jr said, "I'll tell you what, bad call on my part there..." Steinbrink Jr's girlfriend purchased the wood chipper on February 4, 2022 using a credit card.

### Bain Station Rd Paving Project

During 2020, the Village completed road improvements at the intersection of Bain Station Rd and 85<sup>th</sup> Ave in the Village. TH reports that a portion of the intersection improvements were to be paid for by a developer and leftover funds were to be paid back to the developer. TH reports that the engineering estimate for intersection was for approximately \$206,000; however, employees didn't think the project should have cost that much and actual cost of the project was \$115,888. Inv Sharrett reports that Steinbrink took the leftover funds from the project and rolled it over to the next year's repaving budget instead of returning the money to the developer.

Inv Sharrett spoke with NW about the Bain Station Rd project. NW stated that in early 2021, Steinbrink Jr had asked NW to look at a spreadsheet to figure out how much the Bain Station Rd project should cost to complete. NW further said that Steinbrink Jr had directed him to remove the "quantities" section of the invoice and to insert a higher amount for the cost estimate. NW each bid item is always quantified and should never be removed. NW stated that he believes Steinbrink Jr directed him to enter \$206,348.62 and remove the quantity section to make it appear to the developer that all of the money was spent so the Village would not have to repay the developer. Approximately \$90,300 should have been returned to the developer.

NW further explained that the improved intersection is directly across from a farm field owned by someone in the Steinbrink family. RG, a senior employee of DPW confirmed that gates owned by DPW, and culverts were installed on Steinbrink property and that there was no reason for DPW staff to place the gates on that property. Upon information and belief, the improvements were done to the property at

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the direction of Steinbrink Jr. Steinbrink Jr maintained that the gates were necessary to access a sewer line. RG confirmed that there is a sewer line on the property, but those access points were not needed to access the sewer line on the Steinbrink property. Inv Sharrett learned that the Bain Station Rd project and the property improvements occurred on or about February 3, 2020.

#### Concrete Work at Steinbrink Jr's Residence

SF also spoke with Inv Sharrett about Steinbrink Jr's misconduct. SF reported that on or about August 19, 2020 he received a phone call directing him to respond to Steinbrink Jr's home to pour concrete. SF was on duty and working on a hydrant job at the time. SF responded to Steinbrink Jr's home and was directed his DPW vehicle behind the pole barn. SF assumed this was so it would not be seen. SF received the call at approximately 1430 hours and helped pour concrete until approximately 1700 hours. RG also stated that he was asked by Steinbrink to assist with pouring concrete at Steinbrink Jr's residence. RG was on duty at the time, but stated that he used vacation time to assist Steinbrink. RG stated that he and Steinbrink Jr were "losing the concrete" and Steinbrink Jr called SF to assist with the project. RG confirmed that Steinbrink Jr direct SF to park behind the pole barn.

#### Steinbrink Jr Ordered Certain Documents To Be Forged

SF further informed Inv Sharrett that he was one of the employees that forged the temperature checks for the Village's compost piles. SF stated that on or about January 19, 2021 DPW received a call that the Department of Natural Resources (DNR) was coming the following day. SF states that someone found out that the compost temperature checks had not been completed for nearly one to two years. SF said that he and several other employees were directed to use their dirty hands and different colored pens and pencils to forge the temperature documents. RG confirmed that the DNR was going to complete inspections in the Village and that Steinbrink Jr told RG to get the temperature documents "up to snuff" and "they better be up to date."

#### Steinbrink Jr was Involved In The Improper Abandonment Of The Laddish Well

SF reports that on or about March 3, 2020 he was assigned to work on the abandonment of the Laddish Well, located within the Village. Inv Sharrett learned that approximately 150 feet of well casing had been removed before the casing became stuck and work was temporarily stopped. PG, stated that he was a former DPW employee for the Village. PG stated that he was contacted by Steinbrink Jr to cover up the well. PG recalls Steinbrink Jr saying "no matter what, get it done." PG admitted to not properly abandoning the well and just merely covering the top of the well with concrete contrary to regulation.

Employees were asked about what it was like to work for Steinbrink Jr. SS stated that Steinbrink Jr had never been angry towards him; however, he described Steinbrink Jr generally as an angry, narcissistic and manipulating person. SS explained that when he started to work at DPW he was told to do his job, "keep his nose down" and do what he is told to do even if it is the wrong thing. Inv Sharrett learned that employees feared losing their jobs if they did not do as Steinbrink Jr instructed. Another employee, MT stated that employees worked in fear while Steinbrink Jr was in charge of DPW and described work environment as being happier since Steinbrink Jr had left the department. Another employee stated that you don't disagree with Steinbrink Jr because if you do, "you're going to be out of a job."

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Subscribed and sworn to before me on 07/19/22

Electronically Signed By:

John M Wagner

Assistant District Attorney

State Bar #: 1107583

Electronically Signed By:

Kelsey L. Blumenfeld

Complainant

Kenosha County Eye