

FILED

06-08-2021

Clerk of Circuit Court

Kenosha County

2021CM000628

Honorable Jason A.  
Rossell

Branch 2

STATE OF WISCONSIN

CIRCUIT COURT

KENOSHA COUNTY

STATE OF Wisconsin  
Plaintiff,**CRIMINAL COMPLAINT**

vs.

DA Case #: 2021KN002659

JOSEPH D. CLARK

Agency Case #: KPD 2021-00027814

Pleasant Prairie, WI 53158

Mandatory date 6/8/2021

DOB: 10/17/1965

Sex/Race: M/W

Eye Color: Hazel

Hair Color: Gray

Height: 6 ft 0 in

Weight: 250 lbs

Alias:

Defendant.

For Official Use

The undersigned, being first duly sworn, states that:

**Count 1: DISORDERLY CONDUCT, DOMESTIC ABUSE**

The above-named defendant on or about Thursday, June 3, 2021, in the City of Kenosha, Kenosha County, Wisconsin, while in a public or private place, did engage in violent, abusive, indecent, profane, boisterous, unreasonably loud or otherwise disorderly conduct, under circumstances in which such conduct tended to cause or provoke a disturbance, contrary to sec. 947.01(1), 939.51(3)(b), 968.075(1)(a) Wis. Stats., a Class B Misdemeanor, and upon conviction may be fined not more than One Thousand Dollars (\$1,000), or imprisoned not more than ninety (90) days, or both.

And further, invoking the provisions of sec. 968.075(1)(a) Wis. Stats., because this charge is an act of domestic abuse, costs upon conviction would include the domestic abuse assessment imposed under sec. 973.055(1) Wis. Stats.

**PROBABLE CAUSE:**

On June 3, 2021 at approximately 7:20 p.m., Officer Kimberly Voss of the Kenosha Police Department was dispatched to 8035 22<sup>nd</sup> Avenue in the City and County of Kenosha, State of Wisconsin, after [REDACTED] Clark reported that her father, the defendant Joseph D. Clark, had pushed her mother, [REDACTED] Clark.

Officer Voss spoke to [REDACTED] Clark, who reported that she came to visit her husband (the defendant) at his office at [REDACTED]. She was upset to find that the defendant was there alone with a female employee. [REDACTED] confronted them, at which time the defendant told her to leave. When [REDACTED] refused to leave, the defendant pushed her into a wall and out of the door, and she believed she scratched her elbow on the door frame. [REDACTED] stated that she became fearful, as the defendant has been violent toward her in the past. She ran to her car and locked

the door. The defendant followed her outside and screamed at her at the window to stay away from his business. The defendant then punched the window.

██████ declined to provide a written statement or complete domestic abuse paperwork. However, she did elect to enforce the 72-hour contact prohibition. She expressed fear that the defendant would retaliate and was concerned how to stay safe as the defendant has access to several guns in the home, and possibly at the office. She stated that he knows all the lawyers, and has made charges "disappear" in the past.

██████ Clark also declined to provide a written statement. She stated that she was upset, and that her father "couldn't continue to get away with this" but would not elaborate.

Officer Voss then spoke to the defendant. He stated that his wife ██████ showed up and was angry that he was at the office with a female employee. He asked her to leave, but she was refusing so he finally "ushered" her toward the door. He stated she still would not leave so he pushed her through the door and outside. He stated that ██████ was somewhat pushing back against him, but that he is significantly larger than she is. The defendant stated that he followed ██████ to her car and yelled at her through the window not to come back because "she was creating an unhealthy work environment." The defendant stated that he then hit the window of her car with an open hand.

Your complainant is an attorney with the Kenosha County District Attorney's Office, who bases his/her knowledge of this complaint on:

- The official law enforcement agency reports of the Kenosha Police Department prepared by Officer Kimberly Voss, which reports were prepared in the normal course of law enforcement duties;
- Statements by citizen informant(s) ██████ Clark and ██████ Clark; who are eyewitnesses to the facts they relate;
- Statements by the defendant, which were made contrary to his penal interests;

Subscribed and sworn to before me on 06/08/21

Electronically Signed By:

Electronically Signed By:

Margaret M. Drees

Jennifer A. Phan

Complainant

Assistant District Attorney

State Bar #: 1059537