

STATE OF WISCONSIN

CIRCUIT COURT

SHEBOYGAN COUNTY

STATE OF WISCONSIN

CRIMINAL COMPLAINT

-VS-

Robert J Ryan
1231 N Sixth Street
Sheboygan, WI 53081
DOB: 05/28/1963
Sex/Race: M/W

DA Case No.: 2011SB004273
Assigned DA/ADA: Joe DeCecco
Agency Case No.: 11-13975
Court Case No.: 2012CM

Defendant.

Detective Christine Hess, Fond du Lac Sheriff's Department, being first duly sworn on oath deposes and says on information and belief:

Count 1: FOURTH DEGREE SEXUAL ASSAULT

The above-named defendant on or about Saturday, July 23, 2011, in the Village of Elkhart Lake, Sheboygan County, Wisconsin, did have sexual contact with Andrea M.O., DOB 8/18/81, without that person's consent, contrary to sec. 940.225(3m), 939.51(3)(a) Wis. Stats.

Upon conviction for this offense, **a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.**

Count 2: FOURTH DEGREE SEXUAL ASSAULT

The above-named defendant on or about Saturday, July 23, 2011, in the Village of Elkhart Lake, Sheboygan County, Wisconsin, on a separate occasion, did have sexual contact with Andrea M.O., DOB 8/18/81, without that person's consent, contrary to sec. 940.225(3m), 939.51(3)(a) Wis. Stats.

Upon conviction for this offense, **a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.**

The basis of complainant's charge of such offense is: Official reports prepared by Detective Christine Hess of the Fond du Lac Sheriff/Police, which reports indicate that on November 8, 2011 at 6:00 p.m., she and Detective Muellenbach of that department met with Andrea M.O., DOB 8/18/81. The Fond du Lac detectives were conducting the investigation as the Defendant was then the Mayor of Sheboygan and two members of the Sheboygan County Sheriff's Department were members of Sheboygan's Common Council.

Andrea stated that on July 23, 2011, she was with friends at the bar of Siebkens Resort located in Elkhart Lake in Sheboygan County, having arrived sometime between 11:00 p.m. and midnight. She stated she and a friend got seats at the bar. As she spoke with her friend at the bar, subsequently fully identified as Benjamin A. Kamp, DOB 10/21/76, she suddenly felt two hands from behind her touch her stomach and move up her chest where they squeezed both her breasts over her clothing. She stated she was shocked and turned to tell the person directly behind her to keep his hands off her. She described this person as a white male wearing a polo shirt with possibly khaki shorts, dirty blond hair and a short beard.

Andrea stated that a few minutes later, the same man again squeezed her breasts while behind her, at which point she told Benjamin it had happened again. Benjamin then confronted the subject and told him to stop it, with several people who were apparently with the subject stating they were leaving with him, apologized for the subject and stated the subject was very intoxicated. Andrea stated this subject "reeked" of alcohol and was very unsteady on his feet. An unidentified woman at the bar asked Andrea if she realized the subject was the mayor of Sheboygan.

On November 10, 2011, Detectives Hess and Muellenbach made contact with the previously identified Benjamin Kamp. He stated he and Andrea were seated at the bar when he heard her say something along the lines of what the hell are you doing or don't do that. Benjamin, unlike Andrea, immediately recognized the man standing behind Andrea as Mayor Bob Ryan. Benjamin stated that while he didn't directly observe the first instance of Andrea's breasts being grabbed, he did turn in time to see the second instance of this same subject grabbing Andrea's breast, although he couldn't tell if the subject was grabbing both of his friend's breasts. Benjamin stated he then confronted the person he identified as the mayor, who appeared to be very intoxicated, with the mayor telling Benjamin he could do what he wanted because of who he was.

On November 14, 2011, subsequent investigation led the Detectives to meet with Brian R. Williams, DOB 6/21/87, a bartender at Siebken's the night of the incident. Brian stated he immediately recognized Mayor Ryan. Brian stated he was very busy at the bar, but did notice the Mayor standing behind a young woman sitting at the bar as the Mayor ordered drinks which he passed back to people who were with him. Brian stated he did see the Mayor grab one of the young woman's breasts which happened in "a split second".

On November 21, 2011, the Detectives made contact with Robert Ryan, DOB 5/28/63, the Defendant. The Defendant stated he was at Siebken's Resort in the bar on one occasion over a three day weekend in July of 2011. He stated he made the mistake of drinking an intoxicant earlier that evening at the Lake Street Café in Elkhart Lake prior to walking to Siebken's with the owner of the Café as after that initial drink the "switch" got turned on and he "was rolling", in an apparent reference to continued and heavy drinking.

The Defendant stated he did recall being confronted by a young woman at Siebken's, but the woman was demanding to know if he was divorced yet and was swearing at him. When directed to the specifics of twice grabbing a woman's breasts that evening, the Defendant adamantly denied doing so.

Subscribed and sworn to before me
this _____ day of April, 2012
and approved for filing:

Assistant District Attorney
Sheboygan County, Wisconsin

Complainant