
State of Wisconsin,

2011 JAN 14 AM 10:30

CIRCUIT COURT
DANE COUNTY, WI

Complaining Witness:
Dorothy Doheny, Det.
Madison Police Dept.

v.

JAMES DAVID HILLS
D.O.B.: MAY 6, 1956

Case No. 2011 CF 79

Defendant.

CRIMINAL COMPLAINT

THE ABOVE-NAMED COMPLAINING WITNESS BEING DULY SWORN
STATES THAT THE ABOVE-NAMED DEFENDANT:

STALKING

Between June 7, 2010, and January 11, 2011, in the County of Dane, State of Wisconsin, defendant intentionally engaged in a course of conduct directed at a specific person, Lana Mades, that caused her to suffer serious emotional distress and would cause a reasonable person under the same circumstances to suffer serious emotional distress, where the defendant should know that the conduct will cause the person to suffer serious emotional distress, in violation of Wis. Stat. §940.32(2).

Upon conviction of this charge, a Class I Felony, the maximum penalty is a fine not to exceed \$10,000, or imprisonment not to exceed 3 years and 6 months, or both.

FACTUAL BASIS

1. The complainant is a police detective employed by City of Madison Police Department (MAPD).
2. The complainant bases this complaint on information and belief and on the reports of fellow MAPD Police Officer (P.O.) Richard Wipperfurth and Officer Shawn Kelly, whom the complainant believes to be truthful and reliable from

past work experience. The complainant also bases this complaint upon her review of several letters of correspondence from the above named defendant - James D. Hills. Finally, the complainant bases this complaint on the statement of the adult citizen victim/witness Assistant City Attorney Lana Mades, and the statement against interest of the above named defendant - James D. Hills.

3. The complainant reviewed a December 1, 2009, report of P.O. Wipperfurth, who reported that he investigated an incident involving a confrontation between James D. Hills and his neighbor on November 28, 2009. Hills admitted to using profanity and "I called her a nigger and I don't give a shit." P.O. Wipperfurth reported that he issued Hills a Disorderly Conduct municipal ordinance citation # A072357.
4. The complainant has reviewed a City of Madison Municipal Court Docket regarding James D. Hills and citation # A072357. The Docket reflects that there was a trial on March 4, 2010. The Docket also reflects that there was a "GUILTY" finding. The Docket reflects "\$429 DUE."
5. The complainant has reviewed a June 7, 2010, letter that Mr. Hills sent to Cynthia Schally, intake investigator at the Office of Lawyer Regulation. The letter indicates that it was also sent to Lana Mades. In that letter, the defendant states that he remains "angry and upset" about the allegations in the municipal proceeding and that he feels that he was treated unfairly and attributes this to the witnesses, officer Wipperfurth, the judges, and "mostly to Lana Mades." The letter goes on to assert that "they should be facing disciplinary and/or criminal charges, terminated from their positions, incarcerated, placed in stocks and whipped and then hung until dead."
6. The complainant has reviewed a letter that Mr. Hills sent to Lana Mades. The envelope is addressed to "Mades 'Corrupt' Assistant 'District Attorney'" at 210 Martin Luther King Jr. Blvd., Rm. 401, Madison, WI 53703. The complainant recognizes this address as being the Madison City Attorney's Office, where Lana Mades is employed. The envelope indicates that it was

processed by the US Postal Service on October 29, 2010. The envelope was received by the Office of the City Attorney on November 2, 2010. Inside the envelope was a letter that begins with “Mades: Hey dumb ass, as you are aware I was wrongfully convicted...” The letter continues: “You and the City of Madison stole \$429 from me.” Hills continues the letter by calling Mades and others “corrupt assholes,” revealing that he has contacted individuals about her “ethics,” and claims that he “will continue to go higher until you face justice – and you will face justice.” He continues the letter by calling her a “worthless piece of shit.” He then writes: “As I informed you previously, this is not going away. So get off your filthy lazy ass and begin to correct what you did. I suggest you contact Judge Koval and inform him that I was wrongfully convicted.” He concludes the letter with the following: “I will continue to write letters causing you more embarrassment and humiliation – you deserve it. I will be contacting the Attorney General next week. You’ll enjoy that.” The defendant’s name appears at the bottom of the letter as “James Hills.”

7. The complainant has reviewed an email dated March 5, 2010, from Marie Berman to Lana Mades titled “Call from James Hills.” Berman writes: “Defendant James Hills just called, asked you to call him back. He sounded hostile and was swearing – in fact, he sounded quite contentious. If you want to talk him (sic), the number is (608) 265-2878. (Is this official Freak Out Friday?? What is up with people today???)”
8. The complainant has reviewed an email dated March 5, 2010, from Lana Mades to Marie Berman in response to Berman’s email. Mades writes: “No, I’m not going to call him back. This is the scary, unstable defendant from yesterday’s CT. This is a closed case now.”
9. The complainant knows that Lana Mades is employed as an Assistant City Attorney for the City of Madison. The complainant has reviewed an email that was sent to her inbox on November 3, 2010, from Lana Mades regarding James Hills. In that email Mades reports that she prosecuted James Hills “for a

DC back in March.” Mades continues that “my gut tells me I should be afraid of this guy.”

10. The complainant has reviewed a letter that Mr. Hills sent to Lana Mades. The envelope is addressed to “The Very Incompetent Lana Mades” at 210 Martin Luther King Jr. Blvd., Rm. 401, Madison, WI 53703. The envelope indicates that it was processed by the US Postal Service on November 12, 2010. The envelope was received by the Office of the City Attorney on November 15, 2010. This letter begins “Mades: Hi Idiot! Well, time for another letter for you – a nice way to start your Monday!” In the letter Hills continues with assertions that Mades is dishonest, corrupt, incompetent, and stupid. He again calls her a “worthless piece of shit.” He again writes: “As I informed you previously, this is not going away.” Hills continues the letter by saying “maybe you could do society a favor and hang yourself.” He concludes the letter with “[a]gain, this is not going away. Keep that in mind stupid.” “James Hills” appears at the bottom of the letter.

11. On December 20, 2010, the complainant spoke with Lana Mades who said that she received a threatening phone call from an individual identifying himself as James Hills. Mades stated that she was fearful of Mr. Hills and fears that he will escalate and do something to physically harm her. The complainant listened to a phone message that was saved on Lana Mades’ voicemail account. The voicemail message indicates that it was recorded on December 16, 2010, at 12:10 PM. The voicemail message contains the voice of an adult male stating in pertinent part: “yes Lana, this is James Hills. I am the person that you wrongfully prosecuted... As you know I am getting very pissed off and you will need to correct this otherwise it is going to have to be dealt with in another way. I suggest you get off your lazy ass and correct this ‘cuz I am one upset person. I’m not writing anymore letters to you – you are going to correct this.”

12. The complainant has reviewed the report of Police Officer Shawn Kelly. Kelly reports that on January 11, 2011, he spoke with Lana Mades at which time Mades provided a letter that she received that day from James Hills. Mades said that she feels disturbed by what she read in this letter and that she feels personally threatened by the language in this letter. The letter is dated January 10, 2011, and it is addressed to Lana Mades, at the City Attorney's Office. The letter again discusses the municipal trial from March 4, 2010. The letter also states that "I hope now that someone will come forward and assist me in correcting the injustices that came my way because of Maynor, Wipperfurth, and you." The letter continues with "This will be your final opportunity to begin to correct this injustice. I am advising you to contact Judge Koval and inform him that I was wrongfully convicted and that corrective action is necessary. The \$429 will be returned and you will write a letter of apology to me. Should you fail to do so, it would appear that the only alternative is for me to take matters into my own hands to bring you to justice much the same as you did to me although I would be justified in doing so." The return address on the envelope for this letter states the following: Mr. James Hills Apt. 112, 1120 Moorland Rd., Madison, WI 53713-4033. The envelope is postmarked January 10, 2011, in Madison, WI. The letter indicates that a copy is being sent to many other people including the Madison City Attorney and the Governor of Wisconsin.

13. The complainant has reviewed the report of Detective Scott Sachtjen. Sachtjen reports that on January 11, 2011, he went to the address of the above named defendant, James D. Hills, 1120 Moorland Rd., Madison, WI. At that location Sachtjen did make contact with Hills. Sachtjen asked Hills: "[w]hy did you send the letter?" Hills responded: "I was done wrong." Sachtjen asked Hills if this is the reason why Hills sent the letter. Hills responded "yeah." Hills went on to state that he was "done wrong by the police" and "that filthy attorney." Hills expressed his frustration with having been found guilty of a

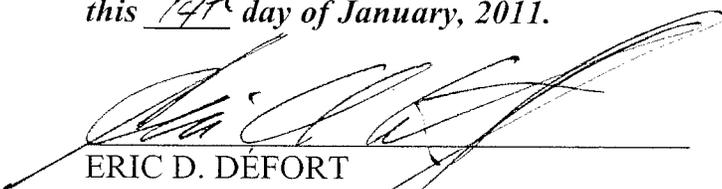
ticket. Sachtjen asked Hills who he sent the letter to and he told Sachtjen “a lot of people.” Hills further stated that he sent it to the City Attorney and the Governor. Hills asked Sachtjen: “who sent you?” He asked, “was it Mades?”

END OF COMPLAINT

Dated this 14 day of January, 2011.


Detective Dorothy Doherty
City of Madison Police Dept.

*Subscribed and sworn to before me
and approved for filing,
this 14th day of January, 2011.*


ERIC D. DEFORT
Assistant Attorney General
Wisconsin Department of Justice
Special Prosecutor for Dane County
State Bar # 1041760