

FILED
08-20-2026
CIRCUIT COURT
DANE COUNTY, WI
2026CV002709
Honorable David Conway
Branch 17

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

AEIRAMIQUE GLASS,
Interim Independent Monitor,
Office of Independent Police Monitor
210 Martin Luther King Blvd,
Room 501,
Madison, WI 53703,

Petitioner,

vs.

JOHN PATTERSON,
Chief of Police,
City of Madison Police Department,
211 S. Carroll Street,
Madison, WI 53703,

And

JAMIE DOYLE,
Public Records Custodian,
City of Madison Police Department,
211 S. Carroll Street,
Madison, WI 53703,

Respondents.

Court Case No. 2026CV00____
Case Code 30707

**PETITION OF THE CITY
OF MADISON'S OFFICE
OF THE INDEPENDENT
POLICE MONITOR FOR
AN ORDER TO SHOW
CAUSE AND FOR
ENFORCEMENT OF A
DULY ISSUED SUBPOENA
TO THE CITY OF
MADISON'S CHIEF OF
POLICE FOR RECORDS**

NOW COMES the Petitioner, the Office of the Independent Police Monitor ("OIPM"), by and through Interim Independent Police Monitor Aeiramique Glass, and petitions this Court pursuant to Wis. Stat. § 885.12 for an Order to Show Cause and Enforcement Order against Respondents Chief of Police John Patterson and Jamie Doyle, the Custodian of Records, of the Madison Police Department ("MPD"). In support thereof, Petitioner respectfully represents and alleges as follows:

I. Parties and Jurisdiction

1. Petitioner OIPM is a municipal oversight agency established under Madison General Ordinance (“MGO”) § 5.19, authorized to conduct independent oversight of the Madison Police Department and vested with subpoena authority pursuant to MGO § 5.19(7)(j).

2. Pursuant to MGO § 5.19(3) and (7), OIPM is structurally and operationally independent of the Madison Police Department, the Mayor’s Office, and the Common Council, and no city official or employee may use their position to unduly influence or undermine the independence of the Monitor.

3. OIPM possesses independent authority under MGO § 5.19(5) and (7) to retain outside legal counsel. Acting pursuant to this authority, Petitioner has retained the undersigned to represent OIPM and initiate these enforcement proceedings under Wis. Stat. § 885.12.

4. Respondent Chief of Police is the executive head of the Madison Police Department.

5. Respondent Jamie Doyle, the Custodian of Records, is the official designated with custody and control over MPD records, documents, and evidence.

6. This Court has subject matter jurisdiction over this enforcement proceeding under Wis. Stat. § 885.12, which expressly empowers judges of courts of record to issue orders to show cause, orders of attachment, and contempt commitments against any person who, without reasonable excuse, fails to produce

books, papers, or documents lawfully commanded by subpoena issued by an authorized municipal oversight officer or board.

7. Subject matter jurisdiction is further conferred pursuant to Wis. Stat. § 753.03, vesting Wisconsin circuit courts with broad general original jurisdiction in all civil actions and special administrative enforcement proceedings.

8. Venue is proper in Dane County Circuit Court pursuant to Wis. Stat. § 885.12 because Dane County is the location where Respondents were obliged to attend and produce the subpoenaed records—namely, at OIPM’s offices located at 210 Martin Luther King Blvd, Room 501, Madison, Wisconsin 53703.

9. Venue is additionally proper pursuant to Wis. Stat. § 801.50(2)(a) and (b) because the claim arose in Dane County, the Respondents maintain their official offices within Dane County, and the underlying municipal agency and records are situated within Dane County.

II. The Facts

10. On July 22, 2026, OIPM initiated an investigation (OIPM Case No. 2026-0099) concerning an officer-involved shooting and death of Corey Ruiz that occurred on or about July 22, 2026.

11. Pursuant to MGO § 5.19(7)(i), which guarantees OIPM “unfettered access to all MPD records, policies, Standard Operating Procedures, data, computer databases, and other information necessary to fulfill the duties of the OIM,” OIPM requested records related to the incident from MPD on July 22, 2026.

12. MPD failed to provide the requested records, offering shifting and inconsistent justifications, including claims that it did not possess the records and later asserting that state law prohibited disclosure.

13. MPD subsequently identified the Wisconsin Department of Justice Division of Criminal Investigation (“DCI”) as a repository or recipient of records regarding the matter.

14. OIPM requested that MPD produce copies of all records provided to DCI, but MPD refused and failed to comply.

15. On July 27, 2026, pursuant to MGO § 5.19(7)(i) and (j), OIPM issued a Subpoena Duces Tecum to Respondents commanding the production of specified records, reports, recordings, communications with DCI, and officer identification/personnel files on or before July 31, 2026.

16. The Subpoena Duces Tecum was lawfully served on Respondents.

17. The production deadline of July 31, 2026, has passed, and Respondents have failed, neglected, and refused to produce the subpoenaed records without lawful excuse or justification.

III. Relief Requested

18. Wis. Stat. § 885.12 provides that if any person, without reasonable excuse, fails to produce a book or paper which the person was lawfully directed to bring before an authorized officer, board, or commissioner, any judge of a court of record in the county where the person was obliged to attend may, upon sworn

proof of the facts, issue an attachment and commit or penalize the person until they perform the required act.

19. OIPM is a legally authorized entity under MGO § 5.19(7)(j) to issue subpoenas to compel production of evidence.

20. Respondents' failure to comply with the Subpoena Duces Tecum issued on July 27, 2026, is without reasonable excuse, frustrates the administrative oversight duties of OIPM, and violates state law governing subpoena enforcement under Wis. Stat. § 885.12.

21. WHEREFORE, Petitioner respectfully requests that this Court enter an Order:

- a. Requiring Respondents Chief of Police and Custodian of Records for the Madison Police Department to appear before this Court on a date and time set by the Court to show cause why an order should not issue compelling immediate compliance with the July 27, 2026, Subpoena Duces Tecum and holding Respondents in contempt pursuant to Wis. Stat. § 885.12;
- b. Issuing an Order compelling Respondents to immediately produce true, unredacted, and complete copies of all records demanded in the July 27, 2026, Subpoena Duces Tecum (OIPM Case No. 2026-0099);
- c. Imposing appropriate sanctions under Wis. Stat. § 885.12 and Wis. Stat. Ch. 785 for any continued, unexcused failure to comply; and

- d. Granting such other and further relief as the Court deems just and equitable.

Date: August 19, 2026.

Respectfully submitted,

*Electronically signed by
Attorney William F. Sulton*

WILLIAM F. SULTON
State Bar No. 1070600

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Counsel for Petitioner

VERIFICATION

STATE OF WISCONSIN)
) ss.
COUNTY OF DANE)

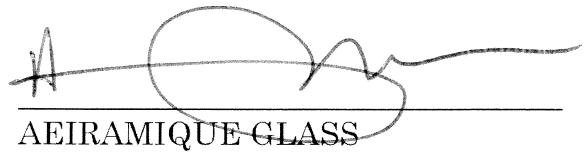
I, Aeiramique Glass, being first duly sworn on oath, state and depose as follows:

1. I am the Interim Independent Police Monitor for the City of Madison, Wisconsin, and the Petitioner in this action.

2. I have read the foregoing Petition for Order to Show Cause and know the contents thereof to be true based on personal knowledge and agency records maintained in the regular course of official business.

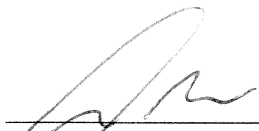
3. On July 27, 2026, I issued and served the attached Subpoena Duces Tecum (OIPM Case No. 2026-0099) upon Respondents.

4. To date, Respondents have failed without reasonable excuse to produce the records lawfully commanded by July 31, 2026.



AEIRAMIQUE GLASS

Subscribed and sworn to before me
this 20 day of August, 2026.



Notary Public, State of Wisconsin
My commission expires: 04/03/2028





OFFICE OF THE INDEPENDENT MONITOR

210 Martin Luther King Jr. Blvd, Room 501, Madison, WI 53703

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OFFICE OF THE INDEPENDENT POLICE MONITOR

CITY OF MADISON, WISCONSIN

SUBPOENA DUCES TECUM

In re: Officer-Involved Shooting and Death of Corey Ruiz, occurring on or about 07-22-2026 (OIPM Case No. 2026-0099)

Officer(s) Involved: Identity and badge number(s) not yet disclosed by MPD; disclosure is demanded herein.

TO: Chief of Police, Madison Police Department, and Custodian of Records, Madison Police Department

Pursuant to the authority vested in the Independent Police Monitor under Madison General Ordinance ("MGO") § 5.19(7)(i) and (j), you are hereby commanded to produce, at the time and place set forth below, all records, documents, data, and materials described in this subpoena, in the possession, custody, or control of the Madison Police Department ("MPD"), relating to the officer-involved shooting and death of Corey Ruiz on or about 07-22-2026.

Background

1. On 07-22-2026, the Office of the Independent Police Monitor ("OIPM") requested from MPD all records and evidence in MPD's possession related to the above-referenced matter, pursuant to MGO § 5.19(7)(i), which entitles OIPM to "unfettered access to all MPD records, policies, Standard Operating Procedures, data, computer databases, and other information necessary to fulfill the duties of the OIM," to the extent permitted by law.
2. In response, MPD first represented that it did not possess the requested records.
3. MPD subsequently represented that state law prohibited disclosure of the requested records.

4. MPD subsequently identified the Wisconsin Department of Justice Division of Criminal Investigation ("DCI") as a repository or recipient of records related to this matter. OIPM thereafter requested that MPD produce all records that MPD provided to DCI in connection with this matter. That request has not been fulfilled.

5. MPD's shifting and inconsistent explanations for withholding records, standing alone, do not relieve MPD of its ordinance-based obligation to provide OIPM with the access described in MGO § 5.19(7)(i), and OIPM is entitled to invoke its subpoena authority under MGO § 5.19(7)(j) to compel production.

Records Demanded

You are commanded to produce true, complete, and unredacted copies of the following, to the extent permitted by law:

- a. All incident reports, supplemental reports, use-of-force reports, and after-action reports concerning the officer-involved shooting and death of Corey Ruiz;
- b. All body-worn camera and dash-camera recordings, audio recordings, radio traffic, and 911 or dispatch records related to the incident;
- c. All internal affairs and administrative investigation files, including witness statements, officer statements, and investigative summaries, related to the incident;
- d. All forensic, ballistic, autopsy, and crime-scene reports related to the incident;
- e. All photographs, diagrams, and physical evidence logs related to the incident;
- f. All communications, correspondence, memoranda, and transmittal records between MPD and the Wisconsin Department of Justice Division of Criminal Investigation (DCI) concerning this matter, including a complete copy of every record, document, and item of evidence MPD provided to DCI in connection with this matter; and
- g. Any other records, data, or materials in MPD's possession, custody, or control concerning the incident that are responsive to OIPM's original request of 07-22-2026; and
- h. The name(s), badge number(s), and assignment(s) of all MPD officer(s) involved in the shooting and death of Corey Ruiz, along with the personnel and training records of said officer(s) .

Continuing Obligation to Supplement

This subpoena imposes a continuing obligation on MPD. To the extent any record described above does not yet exist, has not yet been finalized, or is not yet in MPD's possession, custody, or control as of the production deadline set forth below, including but not limited to any report or communication from the Wisconsin Department of Justice Division of Criminal Investigation (DCI) or any charging decision by the district attorney, MPD shall produce such record to OIPM within five (3) business days of the date it comes into MPD's possession, custody, or control, without the need for a further request or subpoena from OIPM.

Time and Place of Production

Production shall be made before July 31, 2026, at the Office of the Independent Police Monitor, 210 Martin Luther King Blvd, Room 501, Madison, Wisconsin, or by secure electronic transmission to Aglass@cityofmadison.com.

Confidentiality

OIPM will treat all records produced in response to this subpoena as confidential in accordance with MGO § 5.19(9), except to the extent needed to carry out OIPM's duties under MGO § 5.19 and § 5.20.

If you contend that any portion of the demanded records is exempt from production, you are directed to identify, in writing and by category, each such record withheld and the specific legal basis for withholding it, on or before the production deadline set forth above.

SO ISSUED this 27th day of July, 2026.

Aeiramique Glass

Interim Independent Police Monitor

Office of the Independent Police Monitor

City of Madison, Wisconsin