

**CITY OF MADISON ETHICS BOARD
COMPLAINT FORM**

1. All complaints must be made in writing. Completion of this form is not required, but this form is designed to assist you in providing the required information. For more information please refer to the Ethics Board Policy Manual and Madison General Ordinance Section 3.35. For additional information, contact The Office of the City Attorney at (608) 266-4511. The Ethics Board Policy Manual is available on the Office of the City Attorney's website.
2. Complaints shall be directed to the attention of the Ethics Board at the City of Madison, c/o City Attorney's Office, 210 Martin Luther King, Jr. Boulevard, Room 401 City-County Building, Madison, WI 53703.
3. The complaint shall be made under oath and may be made on information and belief.¹

COMPLAINANT INFORMATION

YOUR NAME Emily Samson, VP of the Madison Professional Police Officers' Association			
ADDRESS 5702 Femrite Drive			
CITY Madison		STATE WI	ZIP 53718
HOME PHONE [REDACTED]	DAYTIME PHONE [REDACTED]	EMAIL ADDRESS [REDACTED]	

SUBJECT OF COMPLAINT

NAME Shadayra Kilfoy-Flores		
ADDRESS (IF KNOWN)		
CITY Madison	STATE WI	ZIP
POSITION/OCCUPATION WITH THE CITY Police Civilian Oversight Board, Chair	PHONE (IF KNOWN) [REDACTED]	

The purpose of the Ethics Board is to see that the Code of Ethics as outlined in Section 3.35 of the Madison General Ordinances is uniformly applied to all City of Madison employees and officials. The areas of responsibility include, but are not limited to: (a) Fair and Equal Treatment, (b) Conflict of Interest, (c) Incompatible Employment, (d) Disclosure of Confidential Information, (e) Gifts and Favors, (f) Political Activity, (g) Campaign Contributions, (h) Disclosure of Economic Interests, and (i) Real Estate Disclosure.

NATURE OF COMPLAINT²

SECTION VIOLATED MGO 3.35(5)(a)(1) and (3)	While acting in his official capacity as a Madison Police Officer, Ryan Kimberley responded to a domestic disturbance (MPD Case Number 23-455834) involving a family member of the Chair of the City of Madison's Police Civilian Oversight Board, Shadayra Kilfoy-Flores. Kilfoy-Flores showed up to the scene and attempted to use her position to influence and change the outcome of the police investigation to her own desired resolution. Subsequently, Officer Kimberley was ordered to an internal affairs investigation, which would normally not be the case given Wisconsin's domestic violence laws. (SS 968.075, stating an officer shall arrest the person if reasonable grounds exist for a
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¹ "Information and Belief" means that, while you may not have firsthand knowledge, you are willing to swear under oath that you have a firm belief that it is true.

² The "Nature of the Complaint" is a short general statement of the alleged breach of ethics. For example, a statement related to a violation of the above-listed areas of responsibility: (a) Fair and Equal Treatment, (b) Conflict of Interest, (c) Incompatible Employment, (d) Disclosure of Confidential Information, (e) Gifts and Favors, (f) Political Activity, (g) Campaign Contributions, (h) Disclosure of Economic Interests, and (i) Real Estate Disclosure, is appropriate.

FACTS

The facts constituting the alleged breach of ethics must be set forth in detail with clearness and certainty. Please reference specific sections within Madison General Ordinance Section 3.35 which you believe to have been violated. Attach additional sheets as required.

domestic crime.

While Officer Kimberley was speaking to the family member of Kilfoy-Flores, who was a suspect in the domestic disturbance and very upset on scene, Kilfoy-Flores, who Officer Kimberley did not know, showed up on scene and appeared to be trying to calm the family member down. When Kilfoy-Flores became aware that her family member was going to be arrested as an outcome of the primary officer's investigation, and then that family member began verbally and physically resisting the officers on scene, Kilfoy-Flores stated, "You're not taking her."

During this time frame, Kilfoy-Flores also stated, "I'm going to call Chief Barnes right now and explain to him how this was handled." Kilfoy-Flores continued, "Do you know who I am?" to which Officer Kimberley responded in the negative.

Kilfoy-Flores proceeded by explaining, "I'm the Chair of Madison's Police Civilian Oversight Board. You will be thoroughly investigated to make sure any of your arrests involving young black women will be thoroughly investigated" and "your discrimination tonight is obvious."

Kilfoy-Flores also stated, "I'll be calling JP first thing in the morning." Officer Kimberley knows that "JP" is a nickname for one of MPD's assistant chiefs, John Patterson. Another subject on scene then said, "Call him right now" and Kilfoy-Flores responded, "I will let him know right fucking now" and asked someone to give her her telephone.

Kilfoy-Flores continued, saying, "You saw how this went down, this is wrong" and "you didn't do an investigation" to another officer on scene. Officer Kimberley told me that he ignored Kilfoy-Flores' comments and worried about officer safety due to her hostility and the hostility of others around her directed at the police.

The officers' dashcam and arbitrator audio have been saved for this incident under case number 23-455834.

The audio tape provides a breach of the city of Madison's Code of Ethics, as Kilfoy-Flores referenced her official position, and threatened to call on the Chief of Police and Assistant Chief of Police of the Madison Police Department to try to change the outcome of the call, which was the physical arrest of one of her family members.

The undersigned, under oath, states that he or she has read the foregoing complaint and that the information contained in it is true and correct based on his or her personal knowledge, except for those matters alleged on information and belief and as to those matters, the undersigned believes them to be true and correct.

Emily Kp. Sumner

Subscribed and sworn before me
this 26 day of July, 2024.

Crystal Meyer
NOTARY PUBLIC

My Commission expires (is permanent)
3-2-25 (seal)

