

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

---

VENISE L. WILLIAMS

Plaintiff,

v.

**COMPLAINT**

Civil Action No. 12-C-0863

CHRISTOPHER JACKSON, individually, and in his official capacity as a Sergeant at the Milwaukee Women's Correctional Center,

ANA M. BOATWRIGHT, individually, and in her official capacity as Warden of the Wisconsin Women's Correctional System,

CATHY A. JESS, individually, and in her official capacity as Warden of the Wisconsin Women's Correctional System,

DEBORAH F. CHAMBERS, individually, and in her official capacity as Superintendent of the Milwaukee Women's Correctional Center,

RENEE DUCKWORTH, individually, and in her official capacity as Captain at the Milwaukee Women's Correctional Center,

Defendants.

---

**I. INTRODUCTION**

1. This is a civil rights action for damages brought by Venise L. Williams, who was repeatedly sexually assaulted while an inmate at the Milwaukee Women's Correctional Center by Department of Corrections Sergeant Christopher Jackson, who unleashed a brazen and fearless reign of sexual terror on the female inmates under his direct supervision and control.

## **II. JURISDICTION**

2. This action arises under 42 U.S.C. § 1983. Jurisdiction is conferred by 28 U.S.C. §§ 1331 and 1334(a)(3) and (4).

## **III. PARTIES**

3. Venise L. Williams is an adult resident of Milwaukee, Wisconsin.

4. Christopher Jackson was a Correctional Sergeant at the Milwaukee Women's Correctional Center at all times relevant herein. He acted under color of law as an employee of the State of Wisconsin Department of Corrections. He is sued in his official and individual capacities.

5. Ana M. Boatwright was Warden of the Wisconsin Women's Correctional System in 2007 and early 2008. She acted under color of law as an employee of the State of Wisconsin Department of Corrections. She is sued in her official and individual capacities.

6. Cathy A. Jess was Warden of the Wisconsin Women's Correctional System from 2008 until 2010. She acted under color of law as an employee of the State of Wisconsin Department of Corrections. She is sued in her official and individual capacities.

7. Deborah F. Chambers is the Superintendent of the Milwaukee Women's Correctional Center. She acted under color of law as an employee of the State of Wisconsin Department of Corrections. She is sued in her official and individual capacities.

8. Renee Duckworth is a Captain at the Milwaukee Women's Correctional Center. She acted under color of law as an employee of the State of Wisconsin Department of Corrections. She is sued in her official and individual capacities.

9. The State of Wisconsin is liable for the acts and omissions described herein by Christopher Jackson, Ana M. Boatwright, Cathy A. Jess, Deborah F. Chambers, and Renee Duckworth, which were committed under color of law and within the scope of their respective employment. The State is also liable for the acts and omissions of its employees and agents, because its policies, practices, and customs caused the complained-of violations asserted herein. The State is required by law, pursuant to Wis. Stats. § 895.46(1)(a), to pay and indemnify all judgments, including compensatory and punitive damages, attorneys' fees, and costs, that may be awarded against its officials, employees, and agents.

#### **IV. STATEMENT OF FACTS**

10. The Milwaukee Women's Correctional Center is an all-female, minimum security correctional facility. Approximately fifty percent of the female inmates participate in work release programs. It is one of four female correctional centers within the Department of Corrections, Women's Correctional System.

11. In 2002, Christopher Jackson was a Correctional Officer at Marshall E. Sherrer Correctional Facility in Wisconsin. He was under the direct supervision of then Captain Renee Duckworth and Superintendent Deborah F. Chambers.

12. Subsequently, Sergeant Jackson was required to apply to the Department of Corrections for employment "reinstatement." His "reinstatement" was supported by Superintendent Deborah Chambers who also later praised Sergeant Jackson as a "good, dependable employee" during her testimony at his criminal trial for multiple sexual assaults of Ms. Williams.

13. On August 20, 2007, Christopher Jackson was appointed by Warden Ana M. Boatwright to the position of Correctional Sergeant at the Milwaukee Women's Correctional Center where Superintendent Chambers and Captain Duckworth were his direct supervisors.

14. Almost immediately after he assumed his official duties at the Milwaukee Women's Correctional Center, Sergeant Jackson began sexually assaulting female inmates while on duty and in uniform. Sergeant Jackson was enabled to perpetrate these sexual assaults because he had direct control over the female inmates, was frequently left alone and unsupervised in secluded areas with them, was not otherwise supervised regarding his work activities, was not subject to any policy or practice restricting his access to or activities with female inmates, and was empowered to impose disciplinary actions on them.

15. Plaintiff Venise L. Williams was an inmate at the Milwaukee Women's Correctional Center between February and June, 2008. During that time, Ms. Williams was repeatedly sexually assaulted by Sergeant Jackson. Each of these sexual assaults occurred while Sergeant Jackson was on duty, in uniform, and acting pursuant to his supervisory and disciplinary responsibilities.

16. In March 2008, Sergeant Jackson learned that Ms. Williams violated a Milwaukee Women's Correctional Center conduct rule. He then ordered Ms. Williams to clean a supply closet within the administrative area of the Correctional Center, pressed up against her buttocks, pulled down his pants and ordered Ms. Williams to suck his penis. When Ms. Williams refused, Sergeant Jackson threatened Ms. Williams with formal disciplinary action and told her that he would place her in segregation if she did not comply with his sexual demand.

Sergeant Jackson then ordered Ms. Williams to “jag” him off and forced her to rub his penis with her hand for several minutes.

17. On a second occasion, Sergeant Jackson called Ms. Williams over the Milwaukee Women’s Correctional Center loud speaker and ordered her to clean the administrative offices. He then brazenly assaulted her and forcibly attempted to remove her pants; however, she protested that she was “on her period.” Sergeant Jackson then ordered her to lift up her shirt and remove her bra, and he sucked her breasts. Ms. Williams again demanded that he stop but Sergeant Jackson again threatened to send Ms. Williams to segregation. Under great duress, Ms. Williams was forced to allow Sergeant Jackson to suck on her breasts and she was also forced to masturbate Sergeant Jackson to ejaculation.

18. The third sexual assault also occurred in the administrative offices when Sergeant Jackson called Ms. Williams and ordered her to clean that area. Sergeant Jackson ordered Ms. Williams to lift up her shirt and remove her bra. Sergeant Jackson then placed his penis between her breasts and ordered Ms. Williams to squeeze her breasts together while he pushed his penis up and down between her breasts until he ejaculated on her breasts. Ms. Williams was crying and under great emotional distress during the entire sexual assault.

19. A fourth sexual assault occurred when Ms. Williams was scheduled to be driven by a correctional officer to a job interview at a local restaurant. Sergeant Jackson intervened, reassigned himself, and drove Ms. Williams in a Milwaukee Women’s Correctional Center van

to the interview. Sergeant Jackson drove to a secluded location and ordered Ms. Williams to get into the back of the van and “suck his dick.” To defend herself, Ms. Williams told Sergeant Jackson that she had developed herpes. Sergeant Jackson threatened to review her Milwaukee Women’s Correctional Center medical file and she feared subsequent retaliation. Ms. Williams was forced to comply with Sergeant Jackson’s sexual command and she performed oral intercourse on him while he fondled her breasts. Sergeant Jackson ejaculated into Ms. Williams’ mouth, after which he opened the side door of the van and ordered her to “spit it out.” Sergeant Jackson then drove Ms. Williams to her job interview in this humiliating, unclean, and emotionally distraught condition. Due to her trauma, she was unable to successfully complete this valuable work-release opportunity.

20. Sergeant Jackson attempted to sexually assault Ms. Williams a fifth time when he again called her into the administrative offices and ordered her to clean the supply closet. Ms. Williams told Sergeant Jackson that she “had enough” and refused to comply with his sexual demands. Instead of assaulting her, Sergeant Jackson ordered her into segregation.

21. Ms. Williams lived in constant fear of Sergeant Jackson and his sexual demands. He had unsupervised dictatorial power over her for the duration of her detention at the Milwaukee Women’s Correctional Center. He continuously threatened her with internal discipline and segregation, and threatened to transfer her to another correctional facility.

22. Ms. Williams personally complained to Sergeant Darlene Lockett about abusive behavior by Sergeant Jackson. Sergeant Lockett's only response was to tell her to be careful of Sergeant Jackson and not to "argue" with him.

23. Ms. Williams also personally complained to Sergeant Johnson about abusive behavior by Sergeant Jackson. Sergeant Johnson's only response was to inform her that he didn't like Sergeant Jackson.

24. Ms. Williams also filed a written grievance regarding Sergeant Jackson's harassing behavior—which was not investigated but shared with Sergeant Jackson. He threatened Ms. Williams and stated: "You see, telling on me didn't do anything before." This caused Ms. Williams to be even more fearful of him because of his total lack of supervision and discipline.

25. No confidential reporting procedure for complaints of sexual misconduct by Milwaukee Women's Correctional Center staff was in effect at the time of these assaults.

26. Sergeant Jackson's sexual assaults against Venise L. Williams and other female inmates were open, notorious, and enabled by his total lack of concern for being supervised or punished.

27. Although the Milwaukee Women's Correctional Center was equipped with surveillance cameras, all footage was destroyed every two weeks, which Sergeant Jackson knew and which enabled his sexual assaults. Numerous locations throughout the facility were not equipped with surveillance cameras. Additionally, there were "blind spot" areas which the

cameras could not capture. Sergeant Jackson knew these areas and also committed sexual assaults within those areas.

28. Captain Renee Duckworth and Superintendent Deborah F. Chambers ignored repeated complaints by inmates regarding the abusive behavior of Sergeant Jackson and they failed to prevent or stop his notorious, secluded contact with female inmates in and outside the facility. Captain Duckworth and Superintendent Chambers authorized Sergeant Jackson to escort female inmates in Milwaukee Women's Correctional Center vans for official purposes outside the facility late in the evening, and without any supervision.

29. Warden Cathy A. Jess and Warden Ana M. Boatwright both knowingly maintained procedures, policies, and practices that frustrated and discouraged inmates from filing staff misconduct complaints and allowed Sergeants full access to written misconduct complaints directed to Captain Duckworth and Superintendent Chambers and failing to implement a confidential reporting system for sexual assault victims.

30. Warden Cathy A. Jess and Warden Ana M. Boatwright both knew of the serious and substantial risk to female inmates inherent in authorizing unsupervised male corrections sergeants like Sergeant Jackson to oversee all aspects of the female inmates' living conditions, but they failed to take any action to prevent sexual assaults. Only after Sergeant Jackson's sexual assaults were criminally prosecuted did Warden Boatwright install additional surveillance cameras and implement a policy of maintaining surveillance camera footage for one year.

31. Correctional Sergeant Darlene Lockett testified at Sergeant Jackson's criminal jury trial that the female inmates were always noticeably upset after Sergeant Jackson's shift and that she received significantly more complaints from the female inmates regarding Sergeant Jackson's conduct than for any other sergeant. Sergeant Lockett testified that the large number

of complaints against Sergeant Jackson caused her to be concerned about the “climate” of the Milwaukee Women’s Correctional Center, but she, too, did nothing other than to ask Sergeant Jackson to “kind of tone it down with [the inmates].”

32. On May 29, 2012, Sergeant Jackson was found guilty of three counts of fourth degree sexual assault and one count of third degree sexual assault for the above-described criminal offenses against Ms. Williams. He was sentenced to the maximum time allowed for each fourth degree sexual assault conviction and three years in prison and three years of extended supervision for third degree sexual assault. He is currently an inmate at Dodge Correctional Institute.

33. Ms. Williams was released from correctional detention in February 2012. As a result of the sexual assaults perpetrated against her by Sergeant Jackson, Ms. Williams suffered severe psychological and emotional injuries. While incarcerated, Ms. Williams received limited treatment for her injuries and post-traumatic stress syndrome diagnosis. She remains under medical treatment for her injuries suffered as a result of Sergeant Jackson’s multiple sexual assaults.

## **V. STATEMENT OF CLAIM**

### Constitutional Claims

34. The defendants took Venise L. Williams into legal and physical custody so as to establish a special custodial relationship toward her, giving rise to affirmative legal duties to secure her liberty interests and rights, including her physical safety, essential care and treatment,

bodily integrity and her right to be free from unnecessary pain and suffering—substantive rights protected by the Eighth Amendment to the U.S. Constitution. The defendants’ deliberate indifference and reckless violation of their respective duties, as detailed above, deprived plaintiff of her constitutionally-protected liberty interests and rights and caused her to suffer serious physical and emotional injury.

35. Correctional Sergeant Christopher Jackson repeatedly sexually assaulted plaintiff Venise L. Williams while she was an inmate at the Milwaukee Women’s Correctional Center and violated her right to bodily integrity and her right to be free from unnecessary pain and suffering—substantive rights protected by the Eighth Amendment to the U.S. Constitution.

36. Warden Cathy A. Jess, Warden Ana M. Boatwright, Superintendent Deborah F. Chambers and Captain Renee Duckworth authorized, tolerated, ratified, permitted, or acquiesced in policies, practices, and customs, oral and written, pronounced and *de facto*, including:

- a) The failure to properly train, supervise and discipline male corrections staff responsible for the female inmates, including Sergeant Jackson, evidenced deliberate indifference to sexual assaults against female inmates;
- b) The deliberate failure to implement appropriate policies, practices and customs necessary to protect female inmates from the known substantial risk of sexual abuse inherent in unsupervised access of male corrections staff, including Sergeant Jackson, to the female inmate population;
- c) The deliberate failure to implement policies, practices and customs to facilitate and encourage female inmates to report

sexual misconduct by male corrections staff, and the deliberate failure to actually investigate such complaints and impose proper discipline;

d) The deliberate destruction of video surveillance footage.

These policies, practices, and customs also caused the deprivation of plaintiff's substantive constitutional rights detailed above.

#### PRAYER FOR RELIEF

WHEREFORE, plaintiff respectfully demands a jury trial and prays that this Court:

1. Enter judgment for plaintiff and against each defendant, jointly and severally, awarding compensatory and punitive damages.
2. Award pre-judgment and post-judgment interest, together with costs, disbursements, and reasonable attorney's fees pursuant to 42 U.S.C. § 1988.
3. Award such other relief as may be just and equitable.

Dated at Milwaukee, Wisconsin, this 23<sup>rd</sup> day of August, 2012.

FIRST, ALBRECHT, & BLONDIS, s.c.

/s/ Lawrence G. Albrecht  
Lawrence G. Albrecht  
lalbrecht@fabattorneys.com  
State Bar No. 1015668

/s/ James P. End  
James P. End  
jend@fabattorneys.com  
State Bar No. 1032307

/s/ Jeanette K. Corbett

Jeanette K. Corbett

jcorbett@fabattorneys.com

State Bar No. 1033978

Broadway Theatre Center

158 North Broadway, Suite 600

Milwaukee, WI 53202

Telephone: (414) 271-1972

Facsimile: (414) 271-1511

Attorneys for Plaintiff