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DISTRICT I

March 10, 2026

To:

Hon. Mark A. Sanders
Circuit Court Judge
Electronic Notice

Sarah Burgundy
Electronic Notice

Anna Hodges
Clerk of Circuit Court
Milwaukee County Safety Building
Electronic Notice

Angela Conrad Kachelski
Electronic Notice

You are hereby notified that the Court has entered the following opinion and order:

2024AP2469-CR

State of Wisconsin v. Ramel V. Echols (L.C. # 2020CF3667)

Before White, C.J., Donald, and Geenen, JJ.

Summary disposition orders may not be cited in any court of this state as precedent or authority, except for the limited purposes specified in WIS. STAT. RULE 809.23(3).

Ramel V. Echols appeals a judgment convicting him of one count of second-degree reckless homicide and one count of neglecting a child resulting in death. Echols contends that the evidence presented at his trial was insufficient to support the verdicts. Based upon our review of the briefs and record, we conclude at conference that this case is appropriate for summary disposition. *See* WIS. STAT. RULE 809.21 (2023-24).¹

¹ All references to the Wisconsin Statutes are to the 2023-24 version.

On June 26, 2023, an amended information charged Echols with one count of first-degree reckless homicide and one count of neglecting a child resulting in death. The charges arose after Echols's four-month-old son, Kai,² died from a serious brain injury after being in Echols's care for eight to nine days.

The matter proceeded to trial where multiple witnesses, including Kai's treating physician, law enforcement, Kai's mother, Kai's grandmother, Echols's cousin, and the medical examiner who performed Kai's autopsy, all testified. Ultimately, the jury found Echols guilty of the lesser-included offense of second-degree reckless homicide and neglecting a child resulting in death. The trial court issued a global sentence of 35 years. This appeal follows.

On appeal, Echols contends that the evidence presented at trial was insufficient to support the jury's verdicts. Whether the State presented sufficient evidence to support a verdict is a question of law subject to our independent review. *State v. Booker*, 2006 WI 79, ¶12, 292 Wis. 2d 43, 717 N.W.2d 676. We will affirm “unless the evidence, viewed most favorably to the verdict, is so lacking in probative value and force that no reasonable fact[]finder could have found guilt beyond a reasonable doubt.” *State v. Routon*, 2007 WI App 178, ¶17, 304 Wis. 2d 480, 736 N.W.2d 530. “It is the function of the trier of fact, and not of an appellate court, to fairly resolve conflicts in the testimony, to weigh the evidence, and to draw reasonable inferences from basic facts to ultimate facts.” *State v. Poellinger*, 153 Wis. 2d 493, 506, 451 N.W.2d 752 (1990). If there is a possibility that the fact finder “could have drawn the

² Pursuant to the policy underlying WIS. STAT. RULE 809.86(4), we use a pseudonym to refer to the victim in this case. As the State's brief notes, the confidentiality rule does not extend to homicide victims, *see* RULE 809.86(3); nonetheless, we use a pseudonym for the child victim to protect the family's privacy. *See* WIS. STAT. § 950.02(4)(a)4.a.

appropriate inferences from the evidence adduced at trial to find the requisite guilt, an appellate court may not overturn a verdict even if it believes that the trier of fact should not have found guilt based on the evidence before it.” *Id.* at 507. This standard applies whether the evidence is direct or circumstantial. *See id.* at 503. “Our review of a sufficiency of the evidence claim is therefore very narrow.” *State v. Hayes*, 2004 WI 80, ¶57, 273 Wis. 2d 1, 681 N.W.2d 203.

In order to prove that Echols was guilty of second-degree reckless homicide, the State was required to establish that Echols caused Kai’s death through “criminally reckless conduct,” which required the jury to find that Echols’s conduct created an unreasonable and substantial “risk of death or great bodily harm” to Kai and that Echols was aware that his conduct created that risk. WIS. STAT. § 940.06; WIS JI—CRIMINAL 1060.

To prove child neglect resulting in death, the jury had to find the following six elements: (1) Kai was under 18 years old; (2) Echols was responsible for Kai’s welfare; (3) Echols, through action or inaction for reasons other than poverty, failed to provide necessary care to Kai; (4) that “failure to provide [care] seriously endangered [Kai’s] physical, mental, or emotional health”—i.e., the failure created a serious risk of harm or injury; (5) the failure to provide care was negligent; and (6) Kai died as a result of the negligence. WIS. STAT. § 948.21(2), (3)(a); WIS JI—CRIMINAL 2150A.

The evidence adduced at trial established that while four-month-old Kai was in Echols’s care, Kai began throwing up, became unconscious, and was struggling to breathe. Rather than call 911, Echols called his cousin in a panic. The cousin told Echols to call the paramedics. Echols still did not do so. Instead, Echols and his cousin drove Kai to a local emergency room. Kai was transferred to Children’s Hospital where he was examined by a physician who

specialized in child abuse. The physician testified that Kai sustained injuries consistent with non-accidental head trauma, including retinal hemorrhages, brain bleeding, and brain swelling. The physician testified that Kai likely incurred a head trauma at least a week prior to his hospitalization. Kai was in Echols's care at that time. The medical examiner also testified that Kai died as a result of blunt force trauma.

Echols contends that the evidence was circumstantial at best. It is well-settled that verdicts may be based entirely on circumstantial evidence because "circumstantial evidence is oftentimes stronger and more satisfactory than direct evidence." *Poellinger*, 153 Wis. 2d at 501. Moreover, a jury is allowed to make reasonable inferences from the evidence. *See id.* at 506. We "must accept and follow the inference drawn by the trier of fact unless the evidence on which that inference is based is incredible as a matter of law." *Id.* at 507. The evidence supports the jury's inference that Echols committed both crimes. We cannot conclude that the jury's inference is incredible as a matter of law.

For the foregoing reasons, we affirm the judgment of conviction.

Therefore,

IT IS ORDERED that the judgment is summarily affirmed. *See* WIS. STAT. RULE 809.21.

IT IS FURTHER ORDERED that this summary disposition order will not be published.

Samuel A. Christensen
Clerk of Court of Appeals