

Count 3: FIRST DEGREE RECKLESS INJURY - PTAC, AS A PARTY TO A CRIME, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Friday, May 13, 2022, in the area of North Water Street and East Juneau Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did recklessly cause great bodily harm to MCB, another human being, under circumstances which showed utter disregard for human life, contrary to sec. 940.23(1)(a), 939.50(3)(d), 939.05, 939.63(1)(a) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendant may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And further, invoking the provisions of sec. 939.63(1)(a) Wis. Stats., because the defendant committed this crime while using a dangerous weapon, the maximum term of imprisonment may be increased by not more than 6 months.

Count 4: FIRST DEGREE RECKLESS INJURY - PTAC, AS A PARTY TO A CRIME, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Friday, May 13, 2022, in the area of North Water Street and East Juneau Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did recklessly cause great bodily harm to JIF, another human being, under circumstances which showed utter disregard for human life, contrary to sec. 940.23(1)(a), 939.50(3)(d), 939.05, 939.63(1)(b) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendant may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And further, invoking the provisions of sec. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

Count 5: FIRST DEGREE RECKLESS INJURY - PTAC, AS A PARTY TO A CRIME, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Friday, May 13, 2022, in the area of North Water Street and East Juneau Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did recklessly cause great bodily harm to DSB, another human being, under circumstances which showed utter disregard for human life, contrary to sec. 940.23(1)(a), 939.50(3)(d), 939.05, 939.63(1)(b) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendant may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And further, invoking the provisions of sec. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

Count 6: FIRST DEGREE RECKLESS INJURY - PTAC, AS A PARTY TO A CRIME, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Friday, May 13, 2022, in the area of North Water Street and East Juneau Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did recklessly cause great bodily harm to OG, another human being, under circumstances which showed utter disregard for human life, contrary to sec. 940.23(1)(a), 939.50(3)(d), 939.05, 939.63(1)(b) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendant may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And further, invoking the provisions of sec. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

Count 7: FIRST DEGREE RECKLESS INJURY - PTAC, AS A PARTY TO A CRIME, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Friday, May 13, 2022, in the area of North Water Street and East Juneau Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did recklessly cause great bodily harm to SLB, another human being, under circumstances which showed utter disregard for human life, contrary to sec. 940.23(1)(a), 939.50(3)(d), 939.05, 939.63(1)(b) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendant may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And further, invoking the provisions of sec. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

Count 8: FIRST DEGREE RECKLESS INJURY - PTAC, AS A PARTY TO A CRIME, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Friday, May 13, 2022, in the area of North Water Street and East Juneau Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did recklessly cause great bodily harm to VT, another human being, under circumstances which showed utter disregard for human life, contrary to sec. 940.23(1)(a), 939.50(3)(d), 939.05, 939.63(1)(b) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendant may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And further, invoking the provisions of sec. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

Count 9: FIRST DEGREE RECKLESS INJURY - PTAC, AS A PARTY TO A CRIME, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Friday, May 13, 2022, in the area of North Water Street and East Juneau Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did recklessly cause great bodily harm to KK, another human being, under circumstances which showed utter disregard for human life, contrary to sec. 940.23(1)(a), 939.50(3)(d), 939.05, 939.63(1)(b) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendant may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And further, invoking the provisions of sec. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

Count 10: FIRST DEGREE RECKLESS INJURY - PTAC, AS A PARTY TO A CRIME, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Friday, May 13, 2022, in the area of North Water Street and East Juneau Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did recklessly cause great bodily harm to MP, another human being, under circumstances which showed utter disregard for human life, contrary to sec. 940.23(1)(a), 939.50(3)(d), 939.05, 939.63(1)(b) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendant may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And further, invoking the provisions of sec. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

Count 11: FIRST DEGREE RECKLESS INJURY - PTAC, AS A PARTY TO A CRIME, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Friday, May 13, 2022, in the area of North Water Street and East Juneau Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did recklessly cause great bodily harm to KC, another human being, under circumstances which showed utter disregard for human life, contrary to sec. 940.23(1)(a), 939.50(3)(d), 939.05, 939.63(1)(b) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendant may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And further, invoking the provisions of sec. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

Count 12: FIRST DEGREE RECKLESS INJURY - PTAC, AS A PARTY TO A CRIME, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Friday, May 13, 2022, in the area of North Water Street and East Juneau Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did recklessly cause great bodily harm to GH, another human being, under circumstances which showed utter disregard for human life, contrary to sec. 940.23(1)(a), 939.50(3)(d), 939.05, 939.63(1)(b) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendant may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And further, invoking the provisions of sec. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

Count 13: FIRST DEGREE RECKLESS INJURY - PTAC, AS A PARTY TO A CRIME, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Friday, May 13, 2022, in the area of North Water Street and East Juneau Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did recklessly cause great bodily harm to ALJ, another human being, under circumstances which showed utter disregard for human life, contrary to sec. 940.23(1)(a), 939.50(3)(d), 939.05, 939.63(1)(b) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendant may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And further, invoking the provisions of sec. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

Count 14: FIRST DEGREE RECKLESS INJURY - PTAC, AS A PARTY TO A CRIME, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Friday, May 13, 2022, in the area of North Water Street and East Juneau Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did recklessly cause great bodily harm to LS, another human being, under circumstances which showed utter disregard for human life, contrary to sec. 940.23(1)(a), 939.50(3)(d), 939.05, 939.63(1)(b) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendant may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And further, invoking the provisions of sec. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

Count 15: FIRST DEGREE RECKLESS INJURY - PTAC, AS A PARTY TO A CRIME, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Friday, May 13, 2022, in the area of North Water Street and East Juneau Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did recklessly cause great bodily harm to DJ, another human being, under circumstances which showed utter disregard for human life, contrary to sec. 940.23(1)(a), 939.50(3)(d), 939.05, 939.63(1)(b) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendant may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And further, invoking the provisions of sec. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

Count 16: FIRST DEGREE RECKLESS INJURY - PTAC, AS A PARTY TO A CRIME, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Friday, May 13, 2022, in the area of North Water Street and East Juneau Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did recklessly cause great bodily harm to OM, another human being, under circumstances which showed utter disregard for human life, contrary to sec. 940.23(1)(a), 939.50(3)(d), 939.05, 939.63(1)(b) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendant may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And further, invoking the provisions of sec. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

Probable Cause:

Your complainant is a City of Milwaukee law enforcement officer and bases this complaint on reports generated by the City of Milwaukee Police Department. On May 13, 2022, members of the City of Milwaukee Police Officers were in the area of North Water Street and East Juneau Avenue, Milwaukee, Wisconsin, investigating a prior shooting. Earlier in the evening, the Milwaukee Bucks played in NBA playoff game 6, an event that drew thousands of people to downtown Milwaukee. During the course of their investigation, the officers heard dozens of gunshots and observed several hundred citizens fleeing from the area. Officers saturated the area and observed several individuals discharging firearms and fleeing from the area. Officer Thomas Kotnik, Officer Derek Ertl, Officer Nesrodene Ghassoul, Officer Parker Popp, Officer Ryan Reagan, Officer Timothy Krejci, Officer Phillip Ferguson, Officer Miguel Ortega, Officer Austin Domagalski, and Sergeant James Klusmann all reported that the shooters fired shots in their direction nearly striking several of the officers. Officers responding to the area arrested Lemont Siller, Christopher Murry, and Marquis Jackson.

Officer Matthew Dresen responded to the shooting scene on North Water Street and East Juneau Avenue. Officer Dresen observed Marquise Jackson, in a grey hooded sweatshirt and jeans, ducking down near the rear driver's side of a gold Honda Accord. Mr. Jackson had his arm outstretched as if he was concealing something under the vehicle. Officer Dresen recovered a black AR pistol style firearm under the gold Honda.

On May 14, 2022, Officer Jack Kelly interviewed Lemont Siller after reading him his *Miranda* rights. Mr. Siller stated, in part, that on May 13, 2022, he was in the area of North Water Street when he observed RL DOB: 3/31/02. Mr. Siller said that he and RL had a long standing dispute. Mr. Siller stated that he observed an individual raise up a pistol and fire rounds at him. Mr. Siller stated that he ducked behind a vehicle, removed his Glock firearm, and returned fire.

On May 15, 2022, Detective John Majerle interviewed Christopher Murry after reading him his *Miranda* rights. Mr. Murry indicated that on May 13, 2022, he was in the area of North Water Street. Mr. Murry identified himself on surveillance video shown to him by Detective Majerle. Mr. Murry said that he was behind a food truck and fired his firearm, but stated that he was not shooting at people.

On May 22, 2022, Detective John Majerle interviewed RL. RL identified Alexus Jackson-Milton and stated that she was with Mr. Siller on May 13, 2022 in the area of North Water Street and East Juneau Avenue, Milwaukee, Wisconsin. RL said that he observed Ms. Jackson-Milton with a gun but did not see her shoot.

Detective Elizabeth Rubio reviewed surveillance video recovered from various cameras in the area of the shooting. Detective Rubio made the following observations:

On May 13, 2022, at approximately 11:00 pm, RL and two unknown individuals are standing in the street by the median on East Juneau Avenue in front of the MSOE Dormitory (see Attachment 1- Screen Shot of south facing surveillance camera displaying East Juneau Avenue). Mr. Siller and Mr. Jackson are standing on the sidewalk with six unknown individuals on the north side of East Juneau Avenue. Mr. Siller, Mr. Jackson, and the unknown individuals move up and down East Juneau Avenue continually looking at RL. Mr. Murry is observed interacting with Mr. Siller and Mr. Jackson on East Juneau Avenue. Mr. Siller, Mr. Jackson and the unknown individuals with them eventually congregate on the north east corner of East Juneau Avenue and North Water Street. Mr. Murry walks over to Market Street and meets additional unknown individuals. Mr. Siller, Mr. Jackson and the unknown individuals are observed making phone calls while looking in the direction of RL. Mr. Siller, Mr. Jackson, and the unknown individuals with them begin to walk east bound on East Juneau Avenue. Mr. Jackson and one unknown individual stop near the front corner of a food truck parked on the north side of East Juneau Avenue. Mr. Jackson is observed with a long handgun, later determined to be an AR style firearm.

Based on RL's statement and description, Detective Rubio was able to identify Ms. Jackson-Milton in the surveillance video. Detective Rubio observed Mr. Siller, Ms. Jackson-Milton and four unknown individuals walk east bound on East Juneau Avenue walking into the street and stop in front a parked black vehicle on the south side of the street. As Mr. Siller and Mr. Jackson's group is moving, Mr. Murry and the unknown individuals that he is with move west bound on East Juneau Avenue taking up positions along the north side of the parked food trucks. Mr. Siller, Mr. Jackson, Mr. Murry, Ms. Jackson-Milton and the unknown individual take up positions around RL.

Detective Rubio observed that at 11:08 pm, Ms. Jackson-Milton was with Mr. Siller and pulled a handgun from her pocket while facing RL. Ms. Jackson-Milton backs away east bound on East Juneau Avenue. After observing Ms. Jackson-Milton pull out the handgun, an unknown individual with RL pulls out a handgun and fires shots east bound toward the unknown subject who previously displayed the handgun. The unknown individual returns fire. Mr. Siller, Mr. Jackson, Mr. Murry, Ms. Jackson-Milton and four additional unknown individuals associated with Mr. Siller, Mr. Jackson, Mr. Murry, and Ms. Jackson-Milton all fire shots toward RL (see Attachment 2- Diagram of where shooters were when shots were fired). The shots that are fired by this group all travel in a west and south west direction. RL flees the area, but the group continues to fire shots. A total of 16 individuals were shot including RL. All of those individuals were positioned to the west and south west of where Mr. Siller, Mr. Jackson, Mr.

Murry, Ms. Jackson-Milton and the unknown associates were shooting. Many of the victims were struck in the intersection of North Water Street and East Juneau Avenue and ran south bound (see Attachment 3- Diagram of where shooting victims were struck or ended up).

There were 16 individuals injured in the area of North Water Street and East Juneau Avenue as a result of the above described shooting. The above co-conspirators' actions of shooting at RL resulted in the natural and probable consequence of the following people suffering gunshot wounds and resulting in great bodily harm:

- LP DOB: 6/21/1974 - Suffered a gunshot wound through her chest and back;
- KK DOB: 7/20/1998 - Suffered a gunshot wound to his back left bicep;
- MCB DOB: 11/16/1992 - Suffered a gunshot wound to his left hand;
- JIF DOB: 9/7/01 - Suffered a gunshot wound to his right forearm;
- DSB DOB: 7/17/1991 - Suffered a gunshot wound to his right and left thigh and left ankle;
- OG DOB: 11/1/1993 - Suffered a gunshot wound to his right thigh;
- SLB DOB: 5/3/1987 - Suffered a gunshot wound to her right shoulder;
- MP DOB: 12/7/2003 - Suffered a gunshot wound to her left hip;
- KC DOB: 12/7/2003 - Suffered a gunshot wound to her right buttocks;
- GH DOB: 2/5/2004 - Suffered a gunshot wound to her left shoulder;
- AJ DOB: 10/2/1988 - Suffered a gunshot wound to his left elbow;
- LS DOB: 6/19/1998 - Suffered a gunshot wound to his back;
- DJ DOB: 9/27/2003 - Suffered a gunshot wound to his right buttocks;
- OM DOB: 12/10/2006 - Suffered a gunshot wound to his right chest, buttocks, right bicep;
- VT DOB: 5/11/1982 - Suffered a gunshot wound to his left back and flank;
- RL DOB: 3/31/2002 - Suffered a gunshot wound to his upper right arm.

Additional charges will be filed regarding the victims not associated with the current charges at the completion of the investigation. State also reserves the right to file additional charges related the City of Milwaukee Police Officers articulated above as well as any additional victims of this incident.

****End of Complaint****

Electronic Filing Notice:

This case was electronically filed with the Milwaukee County Clerk of Circuit Court office. The electronic filing system is designed to allow for fast, reliable exchange of documents in court cases. Parties who register as electronic parties can file, receive and view documents online through the court electronic filing website. A document filed electronically has the same legal effect as a document filed by traditional means. You may also register as an electronic party by following the instructions found at <http://efiling.wicourts.gov> and may withdraw as an electronic party at any time. There is a \$ 20.00 fee to register as an electronic party. If you are not represented by an attorney and would like to register an electronic party, you will need to contact the Clerk of Circuit Court office at 414-278-4120. Unless you register as an electronic party, you will be served with traditional paper documents by other parties and by the court. You must file and serve traditional paper documents.

Criminal Complaint prepared by Chad Wozniak.
Subscribed and sworn to before me on 06/20/22
Electronically Signed By:
Chad Wozniak
Assistant District Attorney
State Bar #: 1074345

Electronically Signed By:
Police Officer Jeffry CULLEN,
Complainant