

**CRIMINAL COMPLAINT**

STATE OF WISCONSIN

DA Case No.:2014ML002580

Plaintiff,

vs.

Complaining Witness:

Det. Billy Ball

Allah, Universal K.  
3620 W. Kilbourn Ave.  
Milwaukee, WI 53208  
DOB: 07/09/1977

Court Case No.:

Salahadyn, Salah I.  
2822 North 1st Street  
Milwaukee, WI 53212  
DOB: 05/01/1972

Court Case No.:

Defendants,

THE ABOVE NAMED COMPLAINING WITNESS BEING DULY SWORN, ON INFORMATION AND BELIEF STATES THAT:

**Count 1: ROBBERY - PTAC, AS A PARTY TO A CRIME** (As to defendants Universal K. Allah and Salah I. Salahadyn)

The above-named defendants on or about Monday, January 27, 2014, at 8815 West Wisconsin Ave., in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, with intent to steal, did take property from the person of Frank Almond (a 1715 Stradivarius violin, case and contents), the owner, by using force against the person of the owner with intent thereby to overcome the said owner's resistance or power of resistance to the taking and carrying away of said property, contrary to sec. 943.32(1), 939.50(3)(e), and 939.05 Wis. Stats.

Upon conviction for this offense, a Class E Felony, the defendants may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than fifteen (15) years, or both.

**Count 2: POSSESSION WITH INTENT TO DELIVER CONTROLLED SUBSTANCE (THC) (200 GRAMS OR LESS/4 PLANTS OR LESS) - PTAC, AS A PARTY TO A CRIME** (As to defendant Universal K. Allah)

The above-named defendant on or about Monday, February 03, 2014, at 3620 West Kilbourn Ave., in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did knowingly possess with intent to deliver tetrahydrocannabinols (marijuana), a controlled substance, in an amount not more than 200 grams, contrary to sec. 961.41(1m)(h)1, 939.50(3)(i), 939.05 Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendants may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

**PROBABLE CAUSE:**

I am a City of Milwaukee law enforcement officer and a detective and base this complaint on City of Milwaukee Police reports, interviews with witnesses, confidential sources, statements from fellow law enforcement officers, information from affidavits, and personal knowledge, all of the above that I believe to be reliable. Your complainant states that he along with other law enforcement officers were involved in the investigation of a robbery that occurred at January 27, 2014 at 8815 W. Wisconsin Ave., City and County of Milwaukee, Wisconsin. Based upon that the above information developed during the investigation, I state the following in support of this complaint.

1. Upon information from City of Milwaukee Detective James Hutchinson, a detective for eight years and a law enforcement officer for 12 years. Detective Hutchinson along with other City of Milwaukee law enforcement officers investigated a robbery that occurred on Monday, January 27, 2014 at approximately 10:20 p.m. in the area of 8815 W. Wisconsin Ave., in the City and County of Milwaukee, the location of Wisconsin Lutheran College.

2. At the above date and time, Frank W. Almond, an adult citizen, reported that he was leaving a concert in which he performed. Mr. Almond said he played a violin, and described that violin as a Stradivarius Lipinski 1715 violin. Mr. Almond said that the violin had a reported value of \$6 million. Mr. Almond said he exited the performance hall at Wisconsin Lutheran College on the above date at the above location, and headed to his vehicle parked at that location. As Mr. Almond was about to place the violin into his vehicle parked in the parking lot at that location, Mr. Almond said he was approached by an unknown person. Mr. Almond said he saw that a maroon colored van was parked in the parking stall next to his vehicle. Inside that vehicle was a female, who was wearing a black furry hat. Mr. Almond said as he opened the rear door of his vehicle to place the violin inside, the unknown male who approached him produced a flashlight style Taser type weapon, and fired that Taser at Mr. Almond. Mr. Almond said that the ejected probes of the Taser struck him in the wrist and the chest. Mr. Almond said he fell to the ground, and was momentarily incapacitated. Upon regaining control of himself, Mr. Almond said the Stradivarius Lipinski 1715 violin was missing. The violin was within a case – at the time the above violin and case were taken the case contained the following items: two 19<sup>th</sup> century bows with values of \$20,000 and \$30,000; an Apple I-pad and chargers; a cellular telephone. The taking of the violin was without the consent of Mr. Almond.

3. Todd R. Levy, a clarinetist, said he was at the same performance as described above with Mr. Almond. Mr. Levy said he left the concert along with Mr. Almond at the conclusion of the performance. Mr. Levy was walking ahead of Almond, heading toward his own car that was located in the same parking lot as the vehicle of Mr. Almond. Mr. Levy said he heard a scream, after which Mr. Almond yelled out, "they got the violin." Mr. Levy said he then observed a 1990's model burgundy colored minivan, travel northbound on the parking lot past him then turning westbound on Wisconsin Avenue.

4. Detective Scott Lackovic reported that he conducted a scene investigation regarding the above robbery. Located on the parking lot just to the west of Mr. Almond's vehicle at 8815 W. Wisconsin Ave., Milwaukee Wisconsin were small, confetti size particles which are consistent with particles that are emitted when a Taser weapon is fired. These small pieces of paper contained identifying serial numbers (AFID).

5. Detective Eric Donaldson reported that on Tuesday, January 28, 2014, he conducted follow-up regarding the above stolen violin. Based upon tracking information, Detective Donaldson said he was directed to the area of N. Sherman Blvd. and W. North Ave., in the City of Milwaukee. Detective Donaldson reported he checked that area and observed a black canvas violin case located on the ground near the curb line in the 2200 block of N. 44th St. Detective Donaldson observed that the case was open and that numerous articles were either inside the case, or on the ground near the case. The violin was not contained within the case.

6. Your complainant states that based upon the evidence left at the above scene of the robbery, the Federal Bureau of Investigation determined that the taser (an electric weapon) used in the above robbery was made by Taser International. Records related to that taser reflected that it was sold by VCP Taser Distributors in Texas, and the taser was shipped to Milwaukee on June 19, 2013. Special Agent Brian Due of the Federal Bureau of Investigation related that on that date, the taser was shipped to the address of 2216 N. Martin Luther King Jr. Drive, Milwaukee, Wisconsin and was being received on June 24, 2013 at that location. According to S.A. Due, records reflected that the taser was ordered by a person named Universal K. Allah, D.O.B. 07-09-77.

7. Police Officer Gerardo Orozco reported that on Sunday, February 2, 2014 Milwaukee Police Officer Gerardo Orozco off-duty when he was approached by W.D.<sup>1</sup>, an adult citizen who he previously had contact with over the past two years. W.D. told Police Officer Orozco, "I know where the violin is at." W.D. told P.O. Orozco that he was at a barbershop and that the barber was talking about the missing violin. For this reason, W.D. was subsequently interviewed by Detective Patrick Pajot and Kevin Klemstein. W.D. said that on February 1, 2014 in the late afternoon, he was getting his haircut by defendant Universal Allah (D.O.B. 7/9/1977) at a barbershop located at 2216 N. Martin Luther King Jr. Drive, Milwaukee, Wisconsin. W.D. said while in the barbershop, W.D. indicated that news stories were being broadcast about the missing Stradivarius violin, and people within the barbershop were making comments about this being a stupid thing to do, and were questioning how would somebody be able to sell the stolen violin. Following his haircut, W.D. was asked by Universal Allah to give him a ride home. W.D. said he gave Universal Allah a ride home to his residence at 3620 W. Kilbourn Ave. W.D. said while en route to the residence, Universal Allah said a person named "Salah" stole the violin. Allah stated that "Salah" had researched it and then did the robbery using a taser that Allah had purchased, describing that he "used the electric, not the heat." W.D. then asked Allah if tasers could be tracked; Allah stated that they could, however if the police came and asked him about the taser, he would just state that it was stolen. W.D. said he knew the person that Allah was referring to as "Salah" as being someone he has known since graduation from high school, and who W.D. has seen on multiple occasions. Based on the conversation, W.D. believed that the "Salah" referred to by Allah was Salah Jones, M/B (D.O.B. 05/01/1972) whom he also knew as Salah I. Salahadyn, M/B (05-01-72). W.D. identified defendant Salah I. Salahadyn (D.O.B. 5/1/1972) from a photo array.

8. Your complainant states that the Milwaukee Police Department received information from a confidential source who said that defendant Salah I. Salahadyn (D.O.B. 5/1/1972), whom the source knew (and later identified from a photo), spoke of stealing high end art and how easily it could be stolen from unsuspecting victims. Salahadyn explained that his dream theft was a Stradivarius violin because of its potential value and the fact that it could be snatched from the hands of a musician as they walk down the street. The source knew that Salahadyn

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<sup>1</sup> Initials are used to insure the confidentiality of this citizen witness at the present time.

was serving a prison sentence related to the theft of a \$25,000 statue from somewhere in Milwaukee area in the late 90's.

9. On February 3, 2014, a search warrant was executed at the residence of defendant Salah I. Salahadyn (D.O.B. 5/1/1972) and on February 3, 2014 a search warrant was executed at the residence of defendant Universal K. Allah (D.O.B. 7/9/1977). With respect to the residence of Salah I. Salahadyn (at 2822 N. 1st St., Apt. 303, Milwaukee, Wisconsin) law enforcement officers found Salah I. Salahadyn<sup>2</sup> in the apartment and located within the following evidence: a binder and within the binder were color copies of articles related to Stradivarius violins and articles related to art thefts. Also located in the residence was the Wisconsin Drivers license for Salah Ibin Salahadyn; a vehicle title in that name; a black business card book with a personal note inside referenced, "Taser.com \$500-\$1000", cell phones, a digital scale in a black case and other items. With respect to the residence of Universal K. Allah (at 3620 W. Kilbourn Ave., Apt. 12, Milwaukee, Wisconsin, law enforcement officers found Universal Allah at that apartment and located the following evidence: identifiers in the name of Universal Allah with the address of 3620 W. Kilbourn Ave, Apt. 12 that included utility bills and professional correspondence; a loaded Taurus .357 revolver recovered from a black duffel bag; a "Apple Jacks" cereal box containing a Trident digital scale and a plastic bag containing a quantity of a green plantlike substance suspected to be marijuana (27 grms); a second plastic baggie on the bathroom floor containing a plantlike substance (.29 grms) of suspected marijuana; a laundry bag in the bedroom of the apartment that had a plastic container that had a plantlike substance (17.87 grms) of suspected marijuana.

Detective Kevin Klemstein, trained and experienced in the use of the Narc II Pouch 05 field test, subjected the above described suspected marijuana to that field test. The Narc II Pouch 05 test is a reliable test used to determine the presence of tetrahydrocannabinols, the active element in marijuana. Detective Klemstein received a positive result for the presence of tetrahydrocannabinols with respect to the above suspected marijuana that had a total weight of 45.15 grams.

10. Upon the statement of defendant Universal K. Allah (D.O.B. 7/9/1977), said statement made against his penal interest. Allah said that he knew Salah I. Salahadyn (D.O.B. 5/1/1972) for more than seven years. Allah explained that during the summer of 2013, he received money from Salahadyn for the purchase of a taser. Allah said he made the purchase because he had a CCW permit and Salahadyn did not. The taser was shipped to the barbershop because he did not want the taser sitting at the apartment complex if Allah was not there. Allah said that after the taser came in, he was given the package. Salahadyn asked Allah to hold onto the taser. A few months later, Salahadyn told him that he needed the taser to acquire an "instrument" that was rare and one of a kind. Allah said he knew that Salahadyn was going to rob someone of their "instrument" by using the taser.

Allah stated that he believes on or about January 25, 2014, he received a phone call from Salahadyn who explained that Salahadyn needed the taser. Allah said he retrieved the taser out of the safe and met Salahadyn outside of his apartment complex. Salahadyn told Allah that was going to get the "instrument" from the guy. Allah said he didn't hear from Salahadyn until the next evening, between 9:00 to 9:30 p.m. Salahadyn told Allah that he got the "instrument."

Universal Allah made a statement with respect to the marijuana recovered at his residence described above. Allah said that he had one ounce of marijuana in a clear bag that was inside

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<sup>2</sup> Salahadyn is also referred to as Salah Jones in the law enforcement reports; at some point in time he changed his name.

of a laundry bag. Allah said he purchased the marijuana a couple of days earlier. The marijuana was premium marijuana. Allah said he planned on selling this marijuana for \$325. Allah said he does some small time selling of marijuana as needed, and does this to help him pay the rent and bills. Allah admitted that he had a scale in his house and used it to weigh out the marijuana.

11. On February 5, 2014 defendant Salah Salahadyn lead Detectives Billy Ball and Gus Petropoulos, accompanied by other law enforcement officers, to a residence in the 400 block of E. Smith St. City and County of Milwaukee, Wisconsin where he indicated the above described Stradivarius Lipinski 1715 violin would be located.<sup>3</sup> A search warrant was subsequently executed by law enforcement officers at the above residence in the 400 block of E. Smith St., City and County of Milwaukee, Wisconsin to conduct a search for the violin. A search of the attic at the above location resulted in the recovery of a black suitcase; contained within the above black suitcase was the above described Stradivarius Lipinski 1715 violin taken on January 27, 2014.

12. Also within the suitcase containing the Stradivarius Lipinski 1715 violin was identification for defendant Salah I. Salahadyn (D.O.B. 5/1/1972).

13. This complaint is only a summary of the information developed during the investigation and does not exhaust complainant's knowledge in support of this complaint.

\*\*\*\*End of Felony Complaint\*\*\*\*

Subscribed and sworn to before me and approved for filing this 7th day of February, 2014.

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David Robles  
Assistant District Attorney  
1009608

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Complaining Witness

<sup>3</sup> Paragraph 11 is provided for informational purposes; under the terms of a proffer letter and plea agreement ¶11 may not be used in the probable cause determination with respect to defendant Salah Salahadyn; however ¶11 may be used in the determination against defendant Universal Allah and the veracity of the statements made by Allah.