

**STATE OF WISCONSIN                      CIRCUIT COURT                      MILWAUKEE COUNTY**

**STATE OF WISCONSIN**

**Plaintiff,**

**DA Case No.: 2024ML016004**

**Court Case No.:**

vs.

**CRIMINAL COMPLAINT**

DEAN, SEMIRA A  
2537 NORTH TEUTONIA AVENUE  
MILWAUKEE, WI 53206  
DOB: 01/04/2006

JEANS, CALVEYON ADONTE  
5739 NORTH 68TH STREET  
MILWAUKEE, WI 53218  
DOB: 12/03/2006

PATTERSON, ASHLEY ZAKIA  
4252 NORTH SERCOMBE ROAD  
MILWAUKEE, WI 53216  
DOB: 06/27/2005

ROGERS, TYRONE C  
2865 NORTH SHERMAN BOULEVARD  
MILWAUKEE, WI 53210  
DOB: 04/02/2007

**Defendant(s).**

*For Official Use*

THE BELOW NAMED COMPLAINANT BEING DULY SWORN, ON INFORMATION AND BELIEF STATES THAT:

**Count 1: ATTEMPT ARMED ROBBERY - PTAC, AS A PARTY TO A CRIME** (As to defendant Calveyon Adonte Jeans)

The above-named defendant on or about Thursday, June 20, 2024, at 500 North Broadway, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, with intent to steal, attempted to take property from the person or presence of the owner, NCT, by use or threatening use of a dangerous weapon, contrary to sec. 943.32(2), 939.50(3)(c), 939.32, 939.05 Wis. Stats.

Upon conviction for this offense, an attempt to commit a Class C Felony, the defendants may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than twenty (20) years, or both.

**Count 2: ARMED ROBBERY - PTAC, AS A PARTY TO A CRIME** (As to defendant Calveyon Adonte Jeans)

The above-named defendant on or about Thursday, June 20, 2024, at 451 East Clybourn Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, with intent to steal, did take property from the person or presence of the owner, BAB, by use or threatening use of a dangerous weapon, contrary to sec. 943.32(2), 939.50(3)(c), 939.05 Wis. Stats.

Upon conviction for this offense, a Class C Felony, the defendants may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 3: OPERATING A MOTOR VEHICLE TO FLEE OR IN AN ATTEMPT TO ELUDE AN OFFICER** (As to defendant Calveyon Adonte Jeans)

The above-named defendant on or about Thursday, June 20, 2024, at 1700 West Vliet Street, in the City of Milwaukee, Milwaukee County, Wisconsin, while operating a motor vehicle on a highway, after having received a visual or audible signal from a traffic officer, federal law enforcement officer, or marked or unmarked police vehicle that the operator knew or reasonably should have known was being operated by a law enforcement officer, did knowingly flee or attempt to elude a traffic officer by increasing the speed of the vehicle in an attempt to flee, contrary to sec. 346.04(3), 939.50(3)(h) Wis. Stats.

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

And furthermore, invoking the provisions of Wisconsin Statute 343.31(3)(d)1, upon conviction the department shall revoke the defendant's operating privileges for 6 months.

**Count 4: DRIVE OR OPERATE A VEHICLE WITHOUT OWNER'S CONSENT** (As to defendant Calveyon Adonte Jeans)

The above-named defendant on or about Thursday, June 20, 2024, at 1700 West Vliet Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did intentionally drive or operate a vehicle, a white Chevrolet Trax, without the consent of the owner, DRF, contrary to sec. 943.23(3), 939.50(3)(i) 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.

**Count 5: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY** (As to defendant Calveyon Adonte Jeans)

The above-named defendant on or about Thursday, June 20, 2024, at 1700 West Vliet Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did recklessly endanger the safety of other motorists and pedestrians, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f) Wis. Stats.

Upon conviction for this offense, a Class F Felony, the defendants may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

**Count 6: SECOND DEGREE RECKLESSLY ENDANGERING SAFETY** (As to defendant Calveyon Adonte Jeans)

The above-named defendant on or about Thursday, June 20, 2024, at I-43 at W. Keefe Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, did recklessly endanger the safety of law enforcement officers and construction workers, contrary to sec. 941.30(2), 939.50(3)(g) Wis. Stats.

Upon conviction for this offense, a Class G Felony, the defendants may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

**Count 7: POSSESSION OF A FIREARM BY ADJUDICATED DELINQUENT** (As to defendant Calveyon Adonte Jeans)

The above-named defendant on or about Thursday, June 20, 2024, at I-43 at W. Keefe Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, did possess a firearm, having been adjudicated delinquent for an act committed on or after April 21, 1994, that if committed by an adult in this state would be a felony, contrary to sec. 941.29(1m)(bm), 939.50(3)(g) Wis. Stats.

Upon conviction for this offense, a Class G Felony, the defendants may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

**Count 8: OPERATING A MOTOR VEHICLE WITHOUT OWNER'S CONSENT - PTAC, AS A PARTY TO A CRIME** (As to defendant Calveyon Adonte Jeans)

The above-named defendant on or about Sunday, September 3, 2023, at 1400 E Brady Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did intentionally take and drive a vehicle, a Kia Forte, without the consent of the owner, RS, contrary to sec. 943.23(2), 939.50(3)(h), 939.05 Wis. Stats.

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

**Count 9: THEFT - MOVABLE PROPERTY (SPECIAL FACTS) - PTAC, AS A PARTY TO A CRIME** (As to defendant Calveyon Adonte Jeans)

The above-named defendant on or about Sunday, September 3, 2023, at 1400 E Brady Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did intentionally take and carry away movable property of RS, which property is a firearm, without consent, and with intent to permanently deprive the owner of possession of the property, contrary to sec. 943.20(1)(a) and (3)(d), 939.50(3)(h), 939.05 Wis. Stats.

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

**Count 10: ATTEMPT ARMED ROBBERY - PTAC, AS A PARTY TO A CRIME** (As to defendant Ashley Zakia Patterson)

The above-named defendant on or about Thursday, June 20, 2024, at 500 North Broadway, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, with intent to steal, attempted to take property from the person or presence of the owner, NCT, by use or threatening use of a dangerous weapon, contrary to sec. 943.32(2), 939.50(3)(c), 939.32, 939.05 Wis. Stats.

Upon conviction for this offense, an attempt to commit a Class C Felony, the defendants may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than twenty (20) years, or both.

**Count 11: ARMED ROBBERY - PTAC, AS A PARTY TO A CRIME** (As to defendant Ashley Zakia Patterson)

The above-named defendant on or about Thursday, June 20, 2024, at 451 East Clybourn Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, with intent to steal, did take property from the person or presence of the owner, BAB, by use or threatening use of a dangerous weapon, contrary to sec. 943.32(2), 939.50(3)(c), 939.05 Wis. Stats.

Upon conviction for this offense, a Class C Felony, the defendants may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 12: OPERATING VEHICLE WITHOUT OWNER'S CONSENT (KNOWING PASSENGER)** (As to defendant Ashley Zakia Patterson)

The above-named defendant on or about Thursday, June 20, 2024, at 1700 West Vliet Street, in the City of Milwaukee, Milwaukee County, Wisconsin, knowing that the owner had not consented to the operation of a vehicle, did intentionally accompany, as a passenger in the vehicle, a person while that person violated Wisconsin Statutes section 943.23, contrary to sec. 943.23(4m), 939.51(3)(a) Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendants may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

**Count 13: ATTEMPT ARMED ROBBERY - PTAC, AS A PARTY TO A CRIME** (As to defendant Tyrone C Rogers)

The above-named defendant on or about Thursday, June 20, 2024, at 500 North Broadway, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, with intent to steal, attempted to take property from the person or presence of the owner, NCT, by use or threatening use of a dangerous weapon, contrary to sec. 943.32(2), 939.50(3)(c), 939.32, 939.05 Wis. Stats.

Upon conviction for this offense, an attempt to commit a Class C Felony, the defendants may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than twenty (20) years, or both.

**Count 14: ARMED ROBBERY - PTAC, AS A PARTY TO A CRIME** (As to defendant Tyrone C Rogers)

The above-named defendant on or about Thursday, June 20, 2024, at 451 East Clybourn Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, with intent to steal, did take property from the person or presence of the owner, BAB, by use or threatening use of a dangerous weapon, contrary to sec. 943.32(2), 939.50(3)(c), 939.05 Wis. Stats.

Upon conviction for this offense, a Class C Felony, the defendants may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 15: OPERATING VEHICLE WITHOUT OWNER'S CONSENT (KNOWING PASSENGER)** (As to defendant Tyrone C Rogers)

The above-named defendant on or about Thursday, June 20, 2024, at 1700 West Vliet Street, in the City of Milwaukee, Milwaukee County, Wisconsin, knowing that the owner had not consented to the operation of a vehicle, did intentionally accompany, as a passenger in the vehicle, a person while that person violated Wisconsin Statutes section 943.23, contrary to sec. 943.23(4m), 939.51(3)(a) Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendants may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

**Count 16: ATTEMPT ARMED ROBBERY - PTAC, AS A PARTY TO A CRIME** (As to defendant Semira A Dean)

The above-named defendant on or about Thursday, June 20, 2024, at 500 North Broadway, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, with intent to steal, attempted to take property from the person or presence of the owner, NCT, by use or threatening use of a dangerous weapon, contrary to sec. 943.32(2), 939.50(3)(c), 939.32, 939.05 Wis. Stats.

Upon conviction for this offense, an attempt to commit a Class C Felony, the defendants may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than twenty (20) years, or both.

**Count 17: ARMED ROBBERY - PTAC, AS A PARTY TO A CRIME** (As to defendant Semira A Dean)

The above-named defendant on or about Thursday, June 20, 2024, at 451 East Clybourn Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, with intent to steal, did take property from the person or presence of the owner, BAB, by use or threatening use of a dangerous weapon, contrary to sec. 943.32(2), 939.50(3)(c), 939.05 Wis. Stats.

Upon conviction for this offense, a Class C Felony, the defendants may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 18: OPERATING VEHICLE WITHOUT OWNER'S CONSENT (KNOWING PASSENGER)** (As to defendant Semira A Dean)

The above-named defendant on or about Thursday, June 20, 2024, at 1700 West Vliet Street, in the City of Milwaukee, Milwaukee County, Wisconsin, knowing that the owner had not consented to the operation of a vehicle, did intentionally accompany, as a passenger in the vehicle, a person while that person violated Wisconsin Statutes section 943.23, contrary to sec. 943.23(4m), 939.51(3)(a) Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendants may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

**Count 19: OPERATING A MOTOR VEHICLE WITHOUT OWNER'S CONSENT - PTAC, AS A PARTY TO A CRIME** (As to defendant Semira A Dean)

The above-named defendant on or about Sunday, September 3, 2023, at 1400 E Brady Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did intentionally take and drive a vehicle, a Kia Forte, without the consent of the owner, RS, contrary to sec. 943.23(2), 939.50(3)(h), 939.05 Wis. Stats.

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

**Count 20: THEFT - MOVABLE PROPERTY (SPECIAL FACTS) - PTAC, AS A PARTY TO A CRIME** (As to defendant Semira A Dean)

The above-named defendant on or about Sunday, September 3, 2023, at 1400 E Brady Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did intentionally take and carry away movable property of RS, which property is a firearm, without consent, and with intent to permanently deprive the owner of possession of the property, contrary to sec. 943.20(1)(a) and (3)(d), 939.50(3)(h), 939.05 Wis. Stats.

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

**Probable Cause:**

Complainant is a City of Milwaukee Law Enforcement Official and bases this complaint upon the following:

**As to the First (Attempted) Armed Robbery**

1. The statement of adult female victim NTC, that on 20 June 2024, she was visiting from Milwaukee from out of state, and operating a rental Kia Forte vehicle. NTC stated at approximately 1224 hours, she was in a parking lot at 500 N. Broadway in the City and County of Milwaukee.

2. The continuing statement of NTC, that she was approached by two male and one female suspect from a white Chevrolet Trax vehicle. One of the male suspects was armed with a black semi-automatic firearm. The other male and the female suspect demanded her keys and grabbed at her hands in an attempt to get the keys, while the other male suspect, who was armed, said nothing but stood by with the firearm.<sup>1</sup>

3. The continuing statement of NTC, that she refused to hand over her keys, and fought off the suspects, who eventually re-entered the Chevrolet vehicle and drove off. NTC gave no one permission to attempt to rob her. NTC stated that an unknown suspect was the operator of the Chevrolet vehicle who never exited the vehicle. NTC took a photo of the departing Chevrolet vehicle, which she later provided to law enforcement.

**As to the Second (Successful) Armed Robbery**

4. The statement of adult male victim BAB, that on Wednesday, 20 June 2024, he was visiting Milwaukee from out of town, and operating a dark grey Hyundai Tucson rental vehicle. BAB stated that at approximately 1250 hours, he was at 451 E. Clybourne Street in the City and County of Milwaukee. This location is only two blocks away from the attempted robbery described in paragraphs 1.-3., above.

5. The continuing statement of BAB that while seated in the Hyundai vehicle, he was approached by two suspects, one male and one female. The male suspect was armed with a black semi-automatic firearm.<sup>2</sup>

6. The continuing statement of BAB that the female suspect approached his vehicle, knocked on the window and asked something about restaurants in the area. BAB started looking up restaurants on his phone when the male suspect stuck the firearm inside the vehicle, told BAB to get out of the vehicle, and demanded his keys, vehicle, and property. BAB complied and gave the male suspect his keys. The male suspect then drove off in his Hyundai vehicle with the female suspect as the front passenger. BAB gave no one permission to anyone to rob him or take his property.

<sup>1</sup> These suspects were later determined to be co-Defendant Rogers and two juveniles.

<sup>2</sup> These suspects were later determined to be the two juveniles from the first (attempted) armed robbery.

### **As to the Original Theft of the Firearm**

7. The statement of adult male victim RS, that on 03 September 2023, unknown persons stole his orange 2022 Kia Forte vehicle from outside his cousin's residence at 1400 E. Brady Street, in the City and County of Milwaukee.

8. The continuing statement of RS, that he had only been away from his Kia vehicle for several minutes when he returned to it and found it taken. RS stated that he is a Waukesha County Sheriff's deputy, and that the vehicle contained his duty weapon, a Smith & Wesson .40 caliber semi-automatic firearm, along with his duty belt, duty bag, and his own Smith & Wesson 9mm semi-automatic firearm. RS stated that all these items, including the vehicle were taken without his permission.

9. The statement of City of Milwaukee Police Officer Schweitzer, who recovered RTS's kia vehicle on 04 January 2024 at 3152 N 41<sup>st</sup> Street. The vehicle was unoccupied and running, and still contained the 9mm firearm, but not the .40 caliber firearm.<sup>3</sup>

### **As to the Original Theft of the Chevrolet Trax Vehicle**

10. The statement of adult male victim DRF, that his white Chevrolet Trax vehicle was stolen by two unknown "youths" on 08 June 2024 after he parked it outside the McDonald's at 420 E. Capitol Drive in the City and County of Milwaukee. DRF gave no one permission to take his vehicle. This vehicle was determined to be the same one used in both of the above robberies and the subsequent flight and pursuit.

### **As to Pursuit, Chase, Crash, and Shooting**

11. The statement of City of Milwaukee Police Officer Antonio Obregon, that on Thursday, 20 June 2024, he was on uniformed patrol in a marked City of Milwaukee Police squad car. At approximately 1430 hours, he was facing northbound on N. 17<sup>th</sup> Street at W. Vliet Avenue behind the Chevrolet Trax vehicle identified in the first (attempted) armed robbery. The vehicle was distinctive as it lacked a registration plate and had a bumper sticker. Officer Obregon was aware that a firearm was alleged to have been brandished in both armed robberies.

12. The continuing statement of Officer Obregon that he activated his marked squad car's emergency lights in an attempt to pull the vehicle over. The vehicle did pull to the side of the road briefly on N. 17<sup>th</sup> Street, where it stopped for approximately 12-15 seconds. During this time period, no passengers attempted to exit the Chevrolet vehicle. The vehicle then sped off north bound on N. 17<sup>th</sup> Street before performing a U-turn and accelerating away from the traffic stop.

13. The continuing statement of Officer Obregon, that he pursued the Chevrolet vehicle for several miles at high speeds through light, moderate, and heavy traffic. During the pursuit, the operator of the Chevrolet vehicle drove the wrong way down divided streets, forced vehicles to the side of the road, almost struck a pedestrian, and forced another vehicle up onto a curb.

14. The continuing statement of Officer Obregon that the operator of the Chevrolet vehicle entered northbound Interstate 43 from Highland Boulevard. Once on the highway, the operation of the Chevrolet became more reckless, and the vehicle weaved in and out of traffic, passed vehicles on the shoulder, split lanes, and sideswiped at least one vehicle traveling in the same direction. The highway at the time had moderate to heavy commercial and commuter traffic, including a mail truck and construction

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<sup>3</sup> This firearm was subsequently determined to have been used in both robberies and recovered in the Chevrolet Trax vehicle.

vehicles. The operation of the Chevrolet vehicle was reckless, and it endangered the safety of other motorists while showing utter disregard for their safety.

15. The continuing statement of Officer Obregon that in the area of Interstate 43 and Burleigh Street, the operator of the Chevrolet vehicle entered a construction lane that was bordered by Jersey barriers on either side. The operator of the vehicle accelerated in the construction lane until it encountered a cement truck that was actively laying down cement as part of a construction project with multiple construction workers present.

16. The continuing statement of Officer Obregon that the Chevrolet vehicle slowed and hit the cement truck, then backed up and struck the pursuing squad car. At this time, multiple officers were out of pursuing squad cars with firearms drawn, ordering the occupants of the Chevrolet vehicle out. Rather than exiting the vehicle, the operator of the Chevrolet vehicle drove forward, then reversed again in the direction of at least one officer on foot behind the Chevrolet vehicle. Construction workers on scene either fled north on foot away from the crash, or over the Jersey barrier to the west.

17. The continuing statement of Officer Obregon that one of the pursuing law enforcement officers shot at the driver of the Chevrolet vehicle, which then stopped. All the occupants of the Chevrolet vehicle were then removed. Co-Defendant Jeans was determined to be the operator and had gunshot wounds to the arm and jaw. Co-Defendant Patterson, the front passenger, was visibly pregnant and had gunshot wounds to her head and back. Both these co-Defendants received emergency life-saving medical treatment on scene by Milwaukee Police Department officers. Upon information and belief, co-Defendant Patterson's unborn child did not survive.

18. The continuing statement of Officer Obregon that co-Defendants Rogers and Dean, as well as two juveniles were removed from the rear of the vehicle. A Smith & Wesson .40 caliber firearm was also recovered from the rear of the vehicle. This firearm was subsequently determined to be the same stolen from RS as described above.

#### **As to the Statement of Co-Defendant Jeans**

19. The *Mirandized statement* of co-Defendant Jeans to City of Milwaukee Police Detective Brendan Dolan that he had fled police officers after being involved in a pair of armed robberies. Co-Defendant Jeans admitted to traveling about 80 miles per hour, weaving in and out of traffic, and then driving in the construction lane. Co-Defendant Jeans admitted to attempting to get around a cement truck, striking the truck, and then backing up into a marked City of Milwaukee police squad.

20. The continuing statement of Co-Defendant Jeans, that identified photos of four of the five other occupants of the Chevrolet Trax vehicle, including co-Defendants Rogers, Dean, and Patterson and well as two other occupants that were juveniles, ages 15 and 16. Co-Defendant Jeans stated that 6<sup>th</sup> occupant of the Chevrolet was his girlfriend, co-Defendant Patterson. Co-Defendant Jeans stated he and co-Defendant Patterson had been at his father's for breakfast, and then driving around with the other co-Defendants and the juveniles.

21. The continuing statement of co-Defendant Jeans that he identified stills from surveillance video depicting the attempted robbery described in paragraphs, above, and stated that he provided the firearm to co-Defendant Rogers for the first (attempted) armed robbery, but they were not able to get the woman's vehicle. Co-Defendant Jeans stated that he parked the vehicle because they all knew there was going to be a second robbery.

22. The continuing statement of co-Defendant Jeans that regarding the second (successful) armed robbery, the two juveniles did it while he parked the Chevrolet vehicle in a location from where they



could watch. Following the second (successful) armed robbery, co-Defendant Jeans followed the juveniles until they sold the vehicle for \$200 and some marijuana to a marijuana dealer in the area of N. 17<sup>th</sup> and W. Kinley Streets. He was involved in the pursuit and crash a short time later.

23. The continuing statement of co-Defendant Jeans, that during the pursuit, he threw the firearm in the back seat of the Chevrolet vehicle.

24. The continuing statement of co-Defendant Jeans that regarding the firearm that was used in the robberies, he, his little brother, and co-Defendant Dean were stealing items from cars when they came across a vehicle running in a parking lot and they took it. The vehicle contained the firearm that they subsequently used in the robberies, as well as a taser, baton, a sheriff's badge on a vest and ammunition in the trunk.

#### **As to the Statement of Co-Defendant Rogers**

25. The *Mirandized* statement of co-Defendant Rogers to City of Milwaukee Police Detective Tony Castro, that regarding the first (attempted) robbery, he was an active participant, insofar as his job was to scare the female victim into giving up her keys. Co-Defendant Rogers admitting to possessing the firearm and pointing it at the female victim during the robbery, and that this firearm should have been found in the Chevrolet vehicle after the pursuit and crash. Co-Defendant Rogers did not wish to identify any co-actors.

26. The continuing statement of co-Defendant Rogers, that regarding the second (successful) armed robbery, co-Defendant Rogers stated that he stayed in the Chevrolet vehicle while the male and female robbed the male victim. Co-Defendant Rogers did not possess the firearm during the second (successful) robbery, having passed the firearm off.

27. The continuing statement of co-Defendant Rogers, that regarding the pursuit, he was a passenger in the rear of the Chevrolet vehicle, and that he wanted to get out because he had a case.

#### **As to the Statement of Co-Defendant Dean**

28. The *Mirandized* statement of co-Defendant Dean to City of Milwaukee Police Detective Brian Young, that earlier on 20 June 2024, she had been picked up by co-Defendant Jeans in his white Chevrolet vehicle, along with his girlfriend, co-Defendant Patterson, co-Defendant Rogers, and two identified juveniles. Co-Defendant Jeans was operating the vehicle, with co-Defendant Patterson in the front passenger seat, and everyone else in the rear. Co-Defendant Dean identified all parties by names or nicknames.

29. The continuing statement of co-Defendant Dean that that particular group of people she was with (the occupants of the vehicle) was called the "Crash Out Dummies" and that they would rob people and steal vehicles in downtown Milwaukee. Co-Defendant Dean admitted to being a passenger in the Chevrolet vehicle and knowing that it was stolen as co-Defendant Jeans operated it. Co-Defendant referred to the cars they would steal as "joints."

30. The continuing statement of co-Defendant Dean that regarding the first (attempted) armed robbery, she was seated in the rear of Chevrolet vehicle, and that the group picked out the first victim as a target. Co-Defendant Dean stated that she handed the firearm to co-Defendant Rogers, who actually performed the robbery. As she did so, co-Defendant Dean told co-Defendant Rogers to "go handle that," meaning perform the robbery. The group of occupants decided to leave because the victim in the first (attempted) armed robbery fought back.

31. The continuing statement of co-Defendant Dean that sometime earlier, she had found a Kia Forte vehicle parked and running downtown, so she got into it and drove off. Co-Defendant Dean described a police belt on the back seat, and a firearm underneath the driver's seat, which she kept.<sup>4</sup>

32. The continuing statement of co-Defendant Dean, that regarding the pursuit and crash, she was a rear passenger in the Chevrolet vehicle, that everyone in the vehicle was encouraging co-Defendant Jeans to continue the chase, but they became boxed in. Co-Defendant Dean stated that she heard several shots, crawled out of the vehicle, and attempted to strike police officers for shooting her friends.

33. The continuing statement of co-Defendant Dean, that she generally steals vehicles to buyers expecting them. Co-Defendant Dean stated that she stole four vehicles on 19 June 2024, one of which was stolen during an armed robbery. Those included a red Toyota SUV on the south side, a blue vehicle taken in an armed robbery from a white female victim near the Amtrak station (using the same firearm used in the two 20 June 2024 robberies), a black vehicle near Lake Michigan which was subsequently abandoned out of gas on Silver Spring Drive, as well as an unknown fourth vehicle. This information may provide the basis for an amended information for co-Defendant Dean containing additional charges of *Take and Drive Vehicle Without Owner's Consent*, and/or *Armed Robbery*. When asked if she felt bad about stealing vehicles and robbing victims, co-Defendant Dean stated "no," because it was "fun."

#### **As to Defendant James' Predicate Adjudication**

34. My review of official Milwaukee County Court records in Milwaukee County Case 2022JV0071, which indicates that on 07 March 2022, co-Defendant Jeans was adjudicated delinquent of the felony offense of *Take and Drive Without Owner's Consent*, in violation of Wisconsin Statutes section 943.23(2). Said adjudication was of record and unreversed on all dates relevant to this complaint.

#### **As to the Co-Defendants' Records Generally**

35. My review of the co-Defendant's Juvenile criminal records, which indicate all, excepting co-Defendant Dean, have extensive records involving stolen vehicles. Co-Defendant Jeans, in particular, had multiple open cases from Children's Court that had been in *capias* status since at least February 2023.

\*\*\*\*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.

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<sup>4</sup> This firearm was later determined to be the Smith & Wesson .40 caliber firearm used in both armed robberies.

Criminal Complaint prepared by Stephan Eduard Nolten.  
ADA Assigned Email Address: stephan.nolten@da.wi.gov

Subscribed and sworn to before me on 06/25/24  
Electronically Signed By:  
Stephan Eduard Nolten  
Assistant District Attorney  
State Bar #: 1029106

Electronically Signed By:  
Det Edmund Fitting  
Complainant