

STATE OF WISCONSIN		CIRCUIT COURT	MILWAUKEE COUNTY
STATE OF WISCONSIN		DA Case No.: 2025ML027047	
Plaintiff,		Court Case No.:	
vs.		CRIMINAL COMPLAINT	
HAIRE, MARTELL DE ANTE 4462 NORTH 28TH STREET MILWAUKEE, WI 53209 DOB: 11/30/1987			
Defendant(s).		For Official Use	

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

Count 1: FIRST DEGREE RECKLESS HOMICIDE, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Monday, October 20, 2025, at 7936 West Hampton Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, **did recklessly cause the death of Marquis Champion**, another human being, under circumstances which showed utter disregard for human life, contrary to sec. 940.02(1), 939.50(3)(b), 939.63(1)(b) Wis. Stats.

Upon conviction for this offense, a Class B Felony, the defendant may be sentenced to a term of imprisonment not to exceed sixty (60) years.

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 2: FIRST DEGREE RECKLESS INJURY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Monday, October 20, 2025, at 7936 West Hampton Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, **did recklessly cause great bodily harm to DSS**, another human being, under circumstances which showed utter disregard for human life, contrary to sec. 940.23(1)(a), 939.50(3)(d), 939.63(1)(c) 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)(c) Wis. Stats., because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the underlying crime may be increased by not more than four (4) years.

Count 3: FIRST DEGREE RECKLESS INJURY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Monday, October 20, 2025, at 7936 West Hampton Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, **did recklessly cause great bodily harm to JNL**, another human being, under circumstances which showed utter disregard for human life, contrary to sec. 940.23(1)(a), 939.50(3)(d), 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 4: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Monday, October 20, 2025, at 7936 West Hampton Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, **did recklessly endanger the safety of NMR**, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) Wis. Stats.

Upon conviction for this offense, a Class F Felony, the defendant 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.

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: POSSESSION OF A FIREARM BY A FELON

The above-named defendant on or about Monday, October 20, 2025, at 7936 West Hampton Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, did possess a firearm, having been convicted of a felony in this state, contrary to sec. 941.29(1m)(a), 939.50(3)(g) Wis. Stats.

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

Probable Cause:

Complainant is an employee of Milwaukee Police Department and bases this complaint on information and belief and on a review of official police reports prepared by Milwaukee Police Officers which are the kind Complainant has used in the past and found to be truthful and reliable and which Complainant knows were prepared in the ordinary and regular course of police business.

Response to October 20, 2025 Shooting Scene

As to Count 1:

On October 20, 2025, Officer Taylor Motiff responded to 7936 W. Hampton Avenue, City and County of Milwaukee, for a shooting call for service. Upon arrival, Officer Motiff saw three females run up to the location, with one stating that her son, later identified as DSS, was shot. As Officer Motiff was speaking with them, a silver sedan pulled into the intersection of W. Hampton Avenue and N. 80th Street, and the occupants jumped out, while stating that the victims from the shooting were in the vehicle. Officer Motiff observed an individual, **Marquis Champion**, with his head down in the front passenger seat of the vehicle. As Officer Motiff approached, he observed that he had a large amount of blood on him, and appeared to not be breathing. Officer Motiff called for the Milwaukee Fire Department to render aid. Members of the Milwaukee Fire Department attempted lifesaving measures, which were unsuccessful, and Champion was pronounced deceased on scene.

Champion was conveyed to the Milwaukee County Medical Examiner's Office, whereupon Dr. Joseph Calderaro conducted an autopsy. Dr. Calderaro determined Champion's cause of death to be gunshot wounds to the head, neck, and right upper extremity.

As to Count 2:

Officer Blake Klasberger responded to the scene and observed a black male, DSS, in the bedroom of the residence. Officer Klasberger observed that DSS had what appeared to be a gunshot wound to the upper back, upper left triceps, upper right thigh, and right ankle. Officer Klasberger observed that DSS was losing what appeared to be a significant amount of blood, and had a makeshift tourniquet on his upper right arm. DSS was transported to Children's Hospital, where he underwent emergency surgery to treat the gunshot wounds.

As to Count 3:

On October 20, 2025, Officer Keng Hang was dispatched to 7936 W. Hampton Avenue, City and County of Milwaukee, for a shooting call for service. Upon arrival, he observed JNL in front of the residence. Officer Hang observed that JNL had what appeared to be gunshot wounds to the lower left abdomen, left tricep, and right thumb. JNL was conveyed to Froedtert Hospital for emergency medical treatment.

As to All Counts:

Detective Ndiva Malafa conducted the scene investigation, whereupon he located 9 spent 9mm casings in the residence. Detective Malafa inventoried these 9 spent casings, along with other items, including a glass Jose Cuervo bottle. This glass Jose Cuervo bottle was processed for fingerprints and DNA. Two latent fingerprints were located on the Jose Cuervo Bottle, and identified as the above-referenced defendant's right index finger and left thumb.

Witness Interviews

Officers spoke with NMR, who stated that she was standing in the kitchen with the above-referenced defendant. NMR stated that the three boys—Champion, JNL, and DSS—were sitting next to each other at the kitchen table, across from her and the defendant. NMR stated that she and the defendant got into a verbal disagreement regarding the defendant referring to NMR's daughter and the other girls as "women." NMR stated that she told the defendant he should leave, so he began collecting his things. NMR stated that the defendant was moving between the living room and the kitchen. NMR stated that when he came back into the kitchen, he walked around the back of her, pulled out a black handgun, and began shooting at the young boys sitting at the table "for no reason." NMR stated that the defendant fell to the ground while he was shooting, and as he tried to get up, **he pointed the firearm at her and tried to pull the trigger.** NMR stated that she believed he had run out of ammunition at that point. NMR stated that the defendant then ran out of the residence.

On October 21, 2025, Detective Joshua Nemeth spoke with DSS at children's hospital. DSS stated that he was at NMR's house, cooking in the kitchen with a few others. DSS stated that an unknown black male was there as well. DSS stated that NMR and DSS got into an argument. DSS stated that the male entered the kitchen with a gun in his right hand and started shooting. DSS stated that when the male started shooting, people were running all over the house. DSS stated that he was shot and fell to the ground. **DSS stated that he stayed on the ground and pretended he was dead so he wouldn't get shot more.** DSS stated at first he believed he was only shot once before realizing he was shot more than once. DSS stated that the male was the only person in the house with a gun.

Officers spoke with DTF, who stated that the residence is her "titi's" house, who is NMR. DTF stated that she was in the back bedroom in the upper unit, with her stepsister, HLG, and cousin. DTF stated that they were all on their phones when she heard gunshots, causing them to panic and hide. DTF

stated that her cousin, DSS, came into the room and had blood on him. DTF stated that DSS left a bloody handprint on the bedsheets in the room and then went into NMR's room. DTF stated that she walked into NMR's bedroom and saw DSS sitting on a chair, and the room was covered in blood. DTF stated that DSS told her he thought he was shot 4-5 times. DTF stated that she observed one gunshot wound to his left arm and one gunshot wound to his right arm. DTF stated that she then applied pressure and tried wrapping his extremities to stop the bleeding. DTF stated that the incident started because "Gotti" made a comment about her, HLG, and her cousin being women. DTF stated that NRM did not like the comment, whereupon she and "Gotti" got into a verbal argument. **On October 22, 2025, DTF identified the defendant in a photo array as "Gotti."**

Officers spoke with HLG, who stated that she was at her aunt, NMR's, house. HLG stated that a person named "Gotti" was at the residence as well. HLG stated "Gotti" kept referring to her and her cousins as "young women," which NMR took offense to, because "Gotti" "was a pedophile." HLG stated that this caused an argument between NMR and "Gotti," prompting NMR to tell HLG to go in a back bedroom of the residence. HLG went to a back bedroom, and approximately 10 minutes later, heard "a lot" of gunshots coming from inside the residence. HLG stated that there were too many gunshots to count. HLG stated that on the night of the shooting, she saw "Gotti" with a small black Taurus brand handgun that he placed on the kitchen table. HLG stated that she exited the bedroom after the gunshots stopped, and observed that DSS was shot numerous times. HLG stated that DSS told her to call the police. **On October 22, 2025, HLG identified the defendant in a photo array as "Gotti."**

Officers spoke with MT, who stated that he lives at the above-referenced address with his girlfriend, KB. MT stated that he was parked outside of the residence when he observed someone run from inside of their home—he took note of this because he did not recognize him and he was running from his unit. MT stated that shortly after, the deceased victim ran out, and collapsed. MT stated that the deceased victim was followed by the sister of the deceased, who saying that her brothers were shot. MT stated that they loaded the victims and sister in their car and drove to the Wauwatosa Urgent Care, but they were closed, so they returned to the scene. MT stated that when they returned to the scene, the police were there and began working on the victims. **On October 22, 2025, MT identified the defendant in a photo array as the person he saw running from the residence after the incident.**

Surveillance Video

On October 22, 2025, Detective James Jordan recovered video surveillance footage from 7940 W. Hampton Avenue. Detective Jordan reviewed this footage, and observed that it was approximately one hour behind real time, and depicted N. 80th Street, going south. Detective Jordan observed that at 21:00:18, 10-12 gunshots can be heard. At 21:00:38, a subject runs from the east into camera view. This suspect runs south across W. Hampton Avenue until he was on N. 80th Street. He then runs southbound on N. 80th Street, before appearing to turn to the west and travel outside of camera view.

Defendant's Prior Conviction

This complaint is further based upon my examination of the records maintained by the Milwaukee County Clerk of Circuit Court, which reflect that on July 25, 2006, the defendant was convicted in the Circuit Court of Milwaukee County, in Case No.: 2006CF002001 of the felony offense of felon in possession of a firearm, in violation of Wisconsin Statutes Section 941.29(2)(a), and that said conviction remains of record and unreversed.

****End of Complaint****

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 Emily Zimmer.

Subscribed and sworn to before me on 10/27/25

Electronically Signed By:

Emily Zimmer

Assistant District Attorney

State Bar #: 1116773

Electronically Signed By:

Detective Ndiva Malafa

Complainant