

FILED
02-20-2019
CIRCUIT COURT
DANE COUNTY, WI
2019CF000368

SJV - Incustody

STATE OF WISCONSIN CIRCUIT COURT DANE COUNTY

STATE OF WISCONSIN
Plaintiff,

Ref. Agency: Madison (City) Police
Department

DA Case No.: 2019DA001567

Assigned DA/ADA: _

Agency Case No.: 2019-00043032

Court Case No.: 2019CF

ATN:

vs.

JEROME R WINSLOW
4725 Cottage Grove Rd Apt 8
Madison, WI 53716
DOB: 06/22/1996

Sex/Race: M/B

Eye Color: Brown

Hair Color: Black

Height: 6 ft 2 in

Weight: 180 lbs

Alias: Also Known As Jerome Robert

Winslow

Defendant,

For Official Use

CRIMINAL COMPLAINT

The below-named complaining witness being first duly sworn states the following:

Count 1: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, REPEATER

The above-named defendant on or about Sunday, February 3, 2019, in the City of Madison, Dane County, Wisconsin, did recklessly endanger the safety of Victim, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.62(1)(c) Wis. Stats., a Class F Felony, and upon conviction 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. 939.62(1)(c) Wis. Stats., because the defendant is a repeater, having been convicted of 08/21/2017 of Armed Robbery, a felony, in Jefferson County Case 17CF203 during the five year period immediately preceding the commission of this offense, which conviction(s) remain of record and unreversed, wherefore, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 6 years if the prior conviction was for a felony.

Count 2: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, REPEATER

The above-named defendant on or about Sunday, February 3, 2019, in the City of Madison, Dane County, Wisconsin, did recklessly endanger the safety of Victim, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.62(1)(c) Wis. Stats., a Class F Felony, and upon conviction 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.

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And further, invoking the provisions of sec. 939.62(1)(c) Wis. Stats., because the defendant is a repeater, having been convicted of 08/21/2017 of Armed Robbery, a felony, in Jefferson County Case 17CF203 during the five year period immediately preceding the commission of this offense, which conviction(s) remain of record and unreversed, wherefore, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 6 years if the prior conviction was for a felony.

Count 3: SUBSTANTIAL BATTERY, REPEATER

The above-named defendant on or about Sunday, February 3, 2019, in the City of Madison, Dane County, Wisconsin, did cause substantial bodily harm to Victim, by an act done with intent to cause bodily harm to that person, contrary to sec. 940.19(2), 939.50(3)(i), 939.62(1)(b) Wis. Stats., a Class I Felony, and upon conviction 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 further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted on 08/21/2017 of Armed Robbery, a felony, in Jefferson County Case 17CF203, which conviction(s) remain of record and unreversed, wherefore, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 4 years if the prior conviction was for a felony.

Count 4: FALSE IMPRISONMENT, REPEATER

The above-named defendant on or about Sunday, February 3, 2019, in the City of Madison, Dane County, Wisconsin, did intentionally restrain Victim, without that person's consent, and with the knowledge that he had no lawful authority to do so, contrary to sec. 940.30, 939.50(3)(h), 939.62(1)(b) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted on 08/21/2017 of Armed Robbery, a felony, in Jefferson County Case 17CF203, which conviction(s) remain of record and unreversed, wherefore, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 4 years if the prior conviction was for a felony.

Count 5: ATTEMPT SECOND DEGREE SEXUAL ASSAULT, REPEATER

The above-named defendant on or about Sunday, February 3, 2019, in the City of Madison, Dane County, Wisconsin, by use of force, attempted to have sexual contact, with Victim, without the consent of that person, contrary to sec. 940.225(2)(a), 939.50(3)(c), 939.32, 939.62(1)(c) Wis. Stats., an attempt to commit a Class C Felony, and upon conviction may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than twenty (20) years, or both.

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And further, invoking the provisions of sec. 939.62(1)(c) Wis. Stats., because the defendant is a repeater, having been convicted of 08/21/2017 of Armed Robbery, a felony, in Jefferson County Case 17CF203 during the five year period immediately preceding the commission of this offense, which conviction(s) remain of record and unreversed, wherefore, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 6 years if the prior conviction was for a felony.

FACTS:

Your Complainant is a detective with the City of Madison Police Department and for this complaint is relying on the written police reports submitted by City of Madison Police Officer Henry Whyte, Officer Tyrone Cratic Williams, Officer Daniel Sherrick, Officer Stephen Mackesey, Officer Kenneth Mosely, Officer Damion Figueroa, Officer Lester Moore, Detective Shawn Kelly, Detective Glenn Davis, and Investigator Zachary Haggerty.

INITIAL CALL

Officer Whyte reports on February 3, 2019, at approximately 3:22 a.m., he was sent to the area of Langdon Street and North Carroll Street in the City of Madison, County of Dane, State of Wisconsin, reference a battery. Dispatch notes indicated the Victim appeared to have been beat up, had facial injuries, her clothing was completely soaked, and she was covered in blood.

OFFICER OBSERVATIONS

Officer Whyte reports as he turned onto Carroll Street, he observed a black sweatshirt along the right-hand curb line approximately fifty feet north of the Langdon Street intersection. Officer Whyte saw drag marks from the area past the dark sweater in the street all the way down the asphalt to the cul-de-sac, where the drag marks continued up and over the curb, into the snow and down toward the lake.

Officer Whyte was advised by one of the paramedics that the female patient was already inside the ambulance. Officer Whyte briefly observed the Victim and saw she had serious facial injuries which were extremely red and swollen. The paramedics advised they weren't able to obtain any information from Victim, but the 911 caller was in the cul-de-sac.

CONTACT WITH JB

Officer Whyte contacted JB, who said she and CHF were walking home with their other friend, JR, when JB and CHF turned to walk down Howard Street and JR continued on Langdon. JB said at 3:10 a.m. she and CHF received a phone call from JR saying she believed she saw a girl being dragged down Carroll Street toward the lake by a man, and asked them to check the area in case someone needed help. JB said she and CHF walked to the area of Carroll and Langdon Street and down the hill and eventually down the steps leading to the lake. JB said upon reaching the bottom of the steps, they looked to their right and saw the Victim in the snow, dressed only in a white t-shirt and dark pants. The Victim's face was covered in blood. JB and CHF pointed to the area where they observed the Victim and Officer Whyte observed more drag marks in the snow from the cul-de-sac area toward the lake, and a large area of disturbed snow and blood. Officer Whyte saw a single set of foot prints leaving the area of disturbed snow, walking along the frozen shoreline toward the area of The Edgewater Hotel.

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CONTACT WITH JR

Officer Whyte reports JR said after CHF and JB turned to walk on Howard Place, JR continued walking on the north side of Langdon. Upon passing over the North Carroll Street intersection, she heard "what sounded like people sledding." JR said she looked to her left toward the lake and saw a male dressed in a grey sweatshirt with the hood raised and blue jeans, walking backwards down the side of the street, dragging a female dressed in a light top. JR said she believed the male had a hold of both of the female's hands as he dragged her backwards down the street. JR said the female was lying face-up on her back, and neither the male nor the female were saying anything as the male dragged the female down the hill.

CONTACT WITH THE EDGEWATER HOTEL STAFF

Officer Whyte spoke with The Edgewater Hotel overnight supervisor, ZC, who said he observed the suspect entering The Edgewater property near the dock area at approximately 3:18 a.m. ZC said the suspect continued across the deck and was last seen in that area at approximately 3:20 a.m. ZC later updated saying he found additional footage of the suspect running up the edge of the hotel property toward Gilman Street.

REVIEW OF CITY CAMERAS/SUSPECT DESCRIPTION

Officer Cratic Williams reports in checking city camera video, the suspect is a possible light-skinned black male, between 5'8 and 6'0 tall with a slender build, 20-25 years old, and was wearing a grey hoodie with the hood up over his head, blue jeans, and black tennis shoes. The suspect was noticeably darker than the female victim. Officer Cratic Williams observed the initial incident on the Langdon Street and Carroll Street city camera at 3:07:59 a.m. and saw the Victim walking on Langdon Street on the sidewalk closest to the lake, toward Carroll Street. The suspect was walking a few feet behind the Victim. No one else was observed in the area. The city camera jumped in time to 3:08:42 a.m., where the Victim was now at the corner of Langdon Street and North Carroll Street, crossing North Carroll Street, heading toward Wisconsin Avenue. The suspect was behind the Victim, and was now closer than he was previously. The suspect was walking in wide strides, with his arms out, almost lunging forward in a running motion. As the Victim is seen walking out of view of the camera, the suspect is seen continuing to lunge forward toward her off camera at 3:08:45 a.m. On the Lake Mendota and Carroll Street city camera, at 3:08:45 the Victim is seen crossing Carroll Street, walking toward Wisconsin Avenue and the suspect is seen continuing to stride in large lunges toward the Victim crossing the street. Both subjects leave the view of the camera and at 3:09:09 a.m., Officer Cratic Williams observed the suspect dragging the Victim in the street by her ankles/legs from the corner of Langdon Street and North Carroll Street down the hill northbound on Carroll Street toward Lake Mendota. At 3:09:24 a.m., the suspect paused and began to drag the Victim by her right arm with his right arm as she continued to lay on the street. The suspect continued to drag the Victim toward the lake down the hill. At 3:09:47 a.m., while being dragged by the suspect, the Victim's dark hoodie came off due to the friction of being dragged on the ground, and was left behind on the street. At 3:10:04 a.m., the suspect continued to drag the Victim by her arm over a snowbank at the cul-de-sac, and drug her through the snow toward the lake and out of camera view at 3:10:14 a.m.

SCENE DESCRIPTION AND CLIMATE

Investigator Haggerty described the scene as a dead end street with the roadway ending to the north. After the roadway stops, there is a steep downhill grade to the shoreline of Lake Mendota. At the time of the call, it was dark outside with light drizzle and fog. The outside air

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temperature was around 36 degrees Fahrenheit, but it felt much colder in that area due to a steady breeze and the moisture in the air.

CONDITIONS OF HILL

Detective Davis reports on February 13, 2019, he, and Investigator Holum responded to the dead end of North Carroll Street to take measurements of the hill at the bottom of which the Victim was found. Detective Davis noted the hill was covered in branches, sharp edges, snow, and ice. Detective Davis stood at the top of the hill, where it appeared the Victim and Winslow were last seen on camera, while Investigator Holum attempted to walk down the hill. Detective Davis reports the hill was so steep that Investigator Holum was not able to safely walk down it. Investigator Holum needed to drop to one knee and slide down almost the entirety of the hill. Once at the base of the hill, Detective Davis saw that the tape measure read approximately 57 feet. Investigator Holum was unable to get up the hill the way he had gone down and needed to take the stairs located to the left of the hill to get back up.

CONTACT WITH VICTIM

Officer Sherrick reports at the hospital he observed the Victim's face was extremely swollen, and her eyes were practically swollen shut. The injuries near her mouth made it very difficult for her to talk or for Officer Sherrick to understand some of what she was saying. Her ears were also swollen. She had numerous abrasions on her face and head. Officer Sherrick also observed that the Victim continued to bleed out of her mouth over the course of several hours. The Victim said she could not remember how the night ended.

CT SCAN-SURGERY NEEDED

Officer Sherrick reports the Victim was administered a CT scan and Dr. Hanson advised him that the scan revealed that the Victim suffered numerous orbital and mandible fractures, which would require surgery. Lohaus advised that, in addition to the facial injuries, the Victim had fresh marks on her left elbow, left ankle, and abrasions on her back.

BELT BUCKLE UNDONE

Detective Davis reports on February 4, 2019, the Victim said she remembered hearing footsteps running up behind her before the attack and she remembered kicking. She also said she remembered she saw that her belt buckle was undone after the attack.

CONTACT WITH JASON OLSON (MADISON FIRE MEDIC)

Officer Mosely reports on February 4, 2019, at 8:43 a.m., he contacted Madison Fire Medic Jason Olson, who was one of the first responders to the scene who located the Victim. Olson said upon arrival to the scene he located the Victim, who was seated on her buttocks on the ground and a female civilian was standing over her. Olson said the Victim was conscious and verbal, but wasn't the "most coherent." Olson said the Victim's underwear were hanging out the back of her pants and were "bunched up." Olson said the Victim kept trying to get off the ground onto her feet, but wasn't physically able to do so due to her injuries.

CONTACT WITH REBECCA BLASCHKA (CITY OF MADISON FIRE MEDIC)

Paramedic Rebecca Blaschka reported that she was employed by the City of Madison Fire Medic 3 and was working with her partner, Jason Olson, during the early morning hours on February 3, 2019. Blaschka said she remained on top of the hill and as Olson and the female civilian approached the ambulance with the Victim, she noted that the Victim was wearing a white short sleeve shirt and black pants, her face was bloody and there was blood from the

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Victim in the snow. Blaschka said she used her flashlight to illuminate the victim and observed that the Victim's belt was undone and her zipper was down.

DANNY'S PUB VIDEO REVIEW

Detective Kelly made contact with the owner of Danny's Pub (328 West Gorham Street) who brought up video from the early morning hours of February 3, 2019, and said their system time was approximately 57 minutes ahead of actual time. On the video, Detective Kelly observed the suspect wearing a gray hooded sweatshirt in line outside of the bar, and he enters at around the 1:35 a.m. (actual time of 12:38 AM). The suspect then puts his hood over his head before walking into the bar. Danny's Pub owner also showed Detective Kelly video of the suspect leaving the bar at around 2:40 a.m. (approximately 1:43 a.m. actual time), and he observed that the suspect took off his gray hooded sweatshirt and it was now hanging over his shoulder and his black t-shirt was visible as well.

DEFENDANT FOLLOWS ANOTHER FEMALE BEFORE FOLLOWING VICTIM

Detective Kelly reports he viewed video collected by Officer Figueroa from cameras at 120 Langdon Street. The first video showed the male suspect in the gray hooded sweatshirt walking eastbound in front of 120 Langdon on February 3, 2019, at approximately 2:42 a.m., where the suspect appears to be following a female (not the Victim herein) walking eastbound. This female was approximately 30 feet ahead of him when the two walk out of camera range. The suspect can then be seen walking westbound back on the sidewalk at approximately 2:46 a.m. Upon watching the video from the city network cameras at Langdon/Wisconsin and Langdon/Carroll, Detective Kelly observed the suspect follow the female into the 10 block of Langdon, where the female safely entered a building. The suspect then loitered in a driveway on Langdon before walking back westbound on Langdon. The video from 120 Langdon next shows the suspect following the Victim herein eastbound at approximately 2:07 a.m. until they walked out of camera range. The next intersection was Langdon and Carroll, where the City camera at that location showed the suspect quickly approaching the Victim from behind. The Victim did not appear to ever have any verbal contact with the suspect during this time, and it was unclear if she was aware that she was being followed.

REVIEW OF CITY CAMERAS

Officer Mackesey reports in viewing the Lake Mendota and Carroll camera, at 3:08:46 the Victim is walking across North Carroll Street just as the previous unidentified female did. The next image from this camera, at 3:08:47, is the suspect running, almost in contact with the Victim, who is just reaching the sidewalk of the west side of Langdon Street. The next image is at 3:09:07 (approximately 20 seconds after the previous image). In this image the suspect is seen dragging the Victim away from the sidewalk area onto North Carroll Street. The next image is the Victim being dragged to the end of the circle, which was captured at 3:09:14. Another image from the same camera shows at 3:09:21 as the Victim continues to be dragged with her arms flailed out at her side. From this same camera, at 3:09:23, the suspect appears to lose his grip and adjusts it and is seen bending over the Victim. At 3:09:27 the suspect has adjusted his grip and appears to be pulling with his right arm only to be able to lean with the left side of his body in an effort to pull her down the street which is sand-covered and wet. The next image from this camera is at 3:09:37 and shows a witness at the top of the street crossing in the same path the Victim took. At 3:09:39 the witness is clearly visible at the top of the street as the suspect continues to pull the Victim further down the cul-de-sac area. At 3:09:49 the suspect is seen dragging the Victim with one hand and is reaching up to pull his hood back up on his head. The next image from the same camera at 3:09:50 shows the Victim's jacket has

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come off due to the friction of being pulled down the street. The security camera at 620 North Carroll Street shows the suspect dragging the Victim toward the end of the circle to the north side near the snowbank. City traffic camera Lake Mendota and Carroll Street shows at exactly 3:10 a.m. the suspect is adjusting his grip as he drags the Victim almost all the way down to the end of North Carroll Street from Langdon Street. Lake Mendota and Carroll camera at 3:10:02 shows the suspect pulling the Victim up over the snowbank. The Lake Mendota and Carroll Street camera shows at 3:10:05 the suspect has almost halfway pulled the Victim up over the snowbank and the Victim's shoes and feet are in the road and her lower body and upper body are on the snowbank as the suspect has made it over and is in the snow area. From this same city camera at 3:10:06 the suspect is seen using both hands to pull the Victim up and over the snowbank and she appears to be slightly raising her head but appears mostly incapacitated due to her injuries. The next image is from 3:10:09 as the suspect again uses one hand as he walks through the snow pulling the Victim behind him. At 3:10:11 only the Victim's lower shirt area, blue jeans, and shoes are visible. The 620 North Carroll Street camera then shows the suspect falling in the deep snow as he is pulling the Victim. The next image is the suspect falling and getting up as he walks in deep snow pulling the Victim behind him. The last image from the 620 North Carroll Street camera shows the suspect pulling the unresponsive-looking Victim down the steep embankment. Officer Mackesey reports he was out to this area during his shift on the day of this attack and found the steep embankment very treacherous. There was debris such as appliances and other things at the bottom. There were also large wooden stumps and mud and rocks and in looking at the embankment, it did not seem that it would have been possible for Officer Mackesey to make his way up it due to its treacherous grade and debris. The last two images are from The Edgewater security camera titled employee entrance dock. The first one is captured at 3:22:19 in which the suspect can be seen in the distance as he finishes traversing the side path and is getting up into the area of the parking drive and garage at The Edgewater.

VIDEO REVIEW FROM 237 LANGDON STREET

Officer Figueroa reports on February 10, 2019, he went to the Phi Delta Theta fraternity house at 237 Langdon Street and made contact with the chapter president, JSO, who had saved video from their camera system when an unwanted person was in the house the morning of February 3, 2019. JSO told Officer Figueroa that his video system is ahead of regular time a little less than two hours. Officer Figueroa viewed the video from the early morning of February 3, 2019, saw the following: At approximately 3:37:34 a.m.: The suspect wearing, a gray sweatshirt, is walking past the front of the house toward the west-facing side. At approximately 3:37:55 a.m.: the suspect, wearing a gray sweatshirt with the hood up, blue jeans, and dark shoes, tries entering the residence through the side door. At approximately 3:38:25 a.m.: the suspect is now seen trying the back door of the residence, but still has not gained entry into the building. At approximately 3:39:42 a.m.: the suspect is seen walking back to the front of the residence and enters through the front door. At approximately 3:40:48 a.m.: the suspect is now seen walking upstairs in the residence. At approximately 3:48:07 a.m.: Other fraternity members are seen walking the suspect back downstairs. At approximately 3:48:19 a.m.: fraternity members are in the front entry area to the residence speaking with the suspect, who now has his hood down, and Officer Figueroa recognized him as Jerome R Winslow (the defendant herein). At approximately 3:53:50 a.m.: Winslow is then seen exiting the house and fraternity members secure the door behind him.

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LATER FOLLOW UP WITH VICTIM

Detective Davis reports on February 11, 2019, he spoke with the Victim and asked if she remembered anything more from the incident since her initial report. The Victim said she separated from her friends on the road that goes in front of KK (Lake Street). She said she remembered the sound of footsteps running up behind her and the next thing she remembered she was seeing trees in a wooded area before again losing consciousness. The Victim said after that she remembered seeing the individuals that came to help her. The Victim said she doesn't believe she ever saw the individual that hit her. The Victim confirmed that her pants had been unbuckled when she regained consciousness.

ID OF DEFENDANT

Officer Moore reports on February 6, 2019, at approximately 9:00 a.m., he was approached by Lieutenant Berkovitz and asked to look at photos and video of the suspect to see if he could identify him. Officer Moore observed still photos of the subject taken from a herein-mentioned video provided by Detective Korger. Upon viewing the video, Officer Moore recognized the subject from prior professional contacts while working as the Darbo-Worthington Neighborhood officer. He was unable to recall the subject's name at that time, but knew he was a former participant in the Darbo-Worthington basketball team. Officer Moore found a Facebook page that contained a picture of the team that included the subject. The subject was tagged in the post under the name Jerome Bron Deno. Officer Moore then went to the Facebook page under the name Jerome Bron Deno. Officer Moore did not believe that Bron Deno was a valid last name of the subject. Jerome Bron Deno listed a brother in the family with the last name Winslow. Officer Moore put the name Jerome Winslow into police contact information, which listed him as a black male with a birth date of 06/22/1996. Officer Moore located another Facebook page for the subject under the name Brondeno Jerome. After obtaining Winslow's information from Madison Police contacts, Officer Moore entered the information into Spillman and discovered a Dane County Jail inmate record and photo of Jerome R. Winslow. This photo was an exact match to the individual Officer Moore observed on Facebook. Officer Moore reports he also believes this is the same subject that is in the photos and video provided by Lieutenant Berkovitz and Detective Korger of the incident that occurred on February 3, 2019.

WINSLOW INTERVIEW

Detective Davis reports on February 6, 2019, he spoke with Winslow, who initially denied being downtown on February 3, 2019. Detective Davis removed a still photo from Danny's Pub security video that depicted Winslow standing near the end of the bar next to two females. Winslow looked at the picture and said "another black guy." Detective Davis told Winslow it wasn't and reminded Winslow that he was not the only individual at the bar, referencing the picture again and the females that he had been seen taking a picture with at the bar. Winslow again asked to see the picture again. Winslow looked at the picture for some time and asked what bar it was. Detective Davis told him it was Danny's. Detective Davis again asked Winslow if he was at Danny's on Saturday. This time, Winslow said "yes, I was." Winslow said, "I did punch that girl." Detective Davis asked Winslow why and he said she said something derogatory to him and it was a build-up of a bunch of things that were going on in his life. Detective Kelly asked where this happened and Winslow said, "on Langdon Street." Winslow said he was walking and he was drunk. Winslow was asked what happened after he punched the Victim and he said she fell. Detective Kelly asked about Winslow dragging her and Winslow said he tried to pick her up because he didn't want someone to walk past and "be like damn, there's just somebody laying on the ground." Winslow said that he woke up the next day and said "damn, I really tweaked." Detective Kelly asked how many times he punched her and

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Winslow said "at least three times." Detective Kelly asked Winslow to help him understand why he dragged her down the hill. Winslow said he was drunk and said something about it wasn't dragging which made it sound like he was a serial killer. Winslow said he literally just left her there and walked off. Winslow said he dropped her right there because he didn't want someone to walk past and call the cops. Winslow said he didn't want to get in trouble. Winslow said that he woke up in the morning and "was like damn, I really did punch this girl." Winslow said what he did was a criminal activity.

EXTENT OF INJURIES AND NONCONSENT STATEMENT

Detective Davis reports on February 13, 2019, he spoke with the Victim who said the doctors at the hospital informed her that she had a broken jaw. She said titanium plates were required to reconstruct her jaw. The Victim said she will have braces and be restricted to a liquid diet for approximately six weeks. The Victim said she did not give anyone consent to punch or batter her, to move or drag her, to remove or undo any of her clothing, or to take her phone. The Victim said her injuries caused her pain.

Your complainant is aware the above-described incidents occurred in the City of Madison, County of Dane, State of Wisconsin.

This complaint is based on the information and belief of your Complainant, who is a detective for the City of Madison, and who learned of the above offenses from the reports of City of Madison Police Officer Henry Whyte, Officer Tyrone Cratic Williams, Officer Daniel Sherrick, Officer Stephen Mackesey, Officer Kenneth Mosely, Officer Damion Figueroa, Officer Lester Moore, Detective Shawn Kelly, Detective Glenn Davis, and Investigator Zachary Haggerty, which reports your Complainant believes to be truthful and reliable inasmuch they were prepared during the course of their official duties.

Further, your Complainant believes the information furnished by the witnesses to be truthful and reliable inasmuch as they are citizen informants and witnessed the events described.

Further, your Complainant believes the information furnished by defendant to be truthful and reliable insofar as they are admissions against penal interest.

Subscribed and sworn to before me on
02/20/19

Electronically Signed By:

Paul W. Humphrey

Assistant District Attorney

State Bar #: 1011671

Electronically Signed By:

Kristine Acker

Complainant