

**FILED**  
**04-12-2024**  
**Anna Maria Hodges**  
**Clerk of Circuit Court**  
**2024CF001692**  
**Honorable Jean Marie**  
**Kies-45**  
**Branch 45**

**STATE OF WISCONSIN                                    CIRCUIT COURT                                    MILWAUKEE COUNTY**

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**STATE OF WISCONSIN**  
   **Plaintiff,**

**DA Case No.: 2024ML009132**  
**Court Case No.:**

vs.

**CRIMINAL COMPLAINT**

ANDERSON, MAXWELL S  
3161 SOUTH 39TH STREET  
MILWAUKEE, WI 53215  
DOB: 11/26/1990

**Defendant(s).**

*For Official Use*

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

**Count 1: FIRST DEGREE INTENTIONAL HOMICIDE**

The above-named defendant on or about Tuesday, April 2, 2024, in Milwaukee County, Wisconsin, did cause the death of Sade C Robinson, another human being, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a) Wis. Stats.

Upon conviction for this offense, a Class A Felony, the defendant shall be sentenced to imprisonment for life.

**Count 2: MUTILATING A CORPSE**

The above-named defendant on or about Tuesday, April 2, 2024, in Milwaukee County, Wisconsin, did dismember a corpse with the intent to conceal a crime, contrary to sec. 940.11(1), 939.50(3)(f) 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.

**Count 3: ARSON OF PROPERTY OTHER THAN BUILDING**

The above-named defendant on or about Tuesday, April 2, 2024, 1819 N. 29<sup>th</sup> Street, in the City of Milwaukee, Milwaukee County, Wisconsin, by means of fire, did intentionally damage the property (other than a building) of Sade C Robinson, valued at \$100 or more, without that person's consent, contrary to sec. 943.03, 939.50(3)(i) Wis. Stats.

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

**Probable Cause:**

Complainant is a law enforcement officer with the Milwaukee County Sheriff’s Office. Complainant bases this complaint on official police reports and statements of members of the Milwaukee County Sheriff’s Office, Milwaukee Police Department, and members of the Wisconsin State Crime Lab.

Complainant notes the events described below occurred in Milwaukee County, Wisconsin. Based on that information, Complainant states as follows:

Discovery of a Severed Human Leg in Warnimont Park

On Tuesday, April 2<sup>nd</sup>, 2024, around 5:29pm, members of law enforcement including the Milwaukee County Sheriff's Office and Cudahy Police Department responded to Warnimont Park located at 5400 S. Lake Drive to a report of a human leg located on the beach. First responders were led by the citizen who called police to the leg. Responding deputies located the right leg of what appeared to be a black female. The leg was severed just below the hip socket and appeared to have been sawn off. The toes on the feet had pink nail polish. The leg did not appear to be decomposing.

Deputy Leon Martin was one of the first responding Sheriff's deputies. Deputy Martin spoke to EM who discovered the leg. EM stated he was meeting his friend at the park. EM stated he and his friend were walking towards the beach/water and then saw the leg just north of the Warnimont pump house at the shoreline.

Deputy Martin reports that the area where the leg was located contains a bluff that is approximately 100 feet tall. The leg was originally found about 2/3 of the way down the bluff, towards the water's edge.

Milwaukee County Sheriff's Office Detective Nathan Spittlemeister searched the area of the park for any cameras that may have captured something related to the discarding of the leg. Detective Spittlemeister located a video from Cudahy High School that shows the parkways nearest to the pump house at the shoreline. The road that leads to the pump house is closed to vehicle traffic by a gate secured with a padlock and chain. The video footage shows, at approximately 2:53am, a vehicle entering the video frame heading eastbound on the parkway towards the road to the pump house. The video shows that vehicle did not make a southbound or northbound turn once reaching the intersection nearest to the service road. The vehicle disappears from the video footage, consistent with the vehicle driving down the road that leads to the pump house. Complainant knows this service road to the pump house would be the furthest that a car could go to get near Lake Michigan in that area. Detective Spittlemeister spoke to Cudahy Police Detective Brian Olson who informed Detective Spittlemeister that on the morning of April 2<sup>nd</sup>, 2024, employees of the Cudahy Water Department reported that the service gate had been struck by a vehicle. The damage to the gate was done after the evening of April 1<sup>st</sup>, and before the morning of April 2<sup>nd</sup>, 2024—this is consistent with when the vehicle is seen on video driving onto that service road. Detective Joseph Blanchar from the Milwaukee County Sheriff's Office went to the pump house gate and recovered broken pieces of a vehicle that were determined to belong to a Honda Civic. These damaged pieces would be consistent with the vehicle ramming the gate to get through.

Detective Spittlemeister also recovered video from the pump house that faces north, in the direction of where the severed leg was recovered. At approximately 3:02am, a human figure can be seen descending the bluff to beach level. This figure appears to make multiple attempts to walk between the beach and the service drive for the pump house. At approximately 4:31am, the vehicle that entered the closed gate leaves and ultimately leaves the park, heading westbound.

The leg was recovered and transported to the Milwaukee County Medical Examiner's Office and was examined by Dr. Lauren Decker. During the examination, based on the size of the leg, Dr. Decker estimated the height of the person to be approximately 5 feet tall. There were multiple cutting impressions around the amputation point as well as sharp force trauma to the exposed femur bone, however the top of the femur bone appeared to have been snapped off. The leg appeared to have been intentionally severed with a sharp instrument, including the bone being sawn halfway through.

### Sade C Robinson Reported Missing

At approximately 9pm on April 2<sup>nd</sup>, 2024, a walk-in report was made by AJ at the Milwaukee Police Department District 5 station. AJ reported that her friend, Sade C Robinson, had not been returning AJ's calls and had not showed up for work. AJ provided a phone number for Robinson of 414-510-4769 and reported she lived at 1858 N. Commerce Street, Apartment 309 in Milwaukee. On April 3<sup>rd</sup>, 2024, Milwaukee Police Officer Nora Burlo responded to Robinson's apartment to conduct a welfare check and was not able to make contact with Robinson. AJ further reported to investigators that the last known activity of Robinson was a SnapChat that AJ viewed, showing that Robinson was at Duke's on Water, located at 158 E. Juneau Avenue in Milwaukee, on the evening of April 1<sup>st</sup>, 2024. No further contact had been made with Robinson after that.

Upon hearing of the discovery of the leg near Warnimont Park, Officer Burlo contacted the Milwaukee County Sheriff's Office to inform them of the report of Robinson being missing as well as the vehicle fire. Complainant knows, through contact that the Milwaukee County Sheriff's Office has had with Robinson's family and friends, that Robinson is approximately 5 feet tall. Complainant knows that Robinson's listed height with the Wisconsin Department of Transportation is 5'0".

Officer Burlo as well as Milwaukee County Sheriff's Office Detective Joseph Blanchar made contact with employees of Robinson's apartment building (1858 N. Commerce Street). The apartment's maintenance employee, EF, indicated that he had last seen Robinson on April 1<sup>st</sup>, 2024. Another employee, building secretary CAS, reported that she would frequently see and speak with Robinson, and Robinson told CAS she was excited for a date she had the evening of April 1<sup>st</sup>. Detective Joseph Blanchar also reviewed video surveillance footage from the apartment building at 1858 N. Commerce Street, and said footage depicts Robinson leaving the building around 9am on April 1<sup>st</sup>, 2024. Robinson is wearing a black puffy coat, a white shirt, light colored blue jeans with multiple tears in front, and white shoes.

### Discovery of Robinson's 2020 Honda Civic

Furthermore, on April 2<sup>nd</sup>, 2024 at approximately 7:32am, members of the Milwaukee Fire Department responded to 1819 N. 29<sup>th</sup> Street (the area of W. Lisbon Ave. and N. 29<sup>th</sup> Street) for a vehicle fire. First responders located a 2020 Honda Civic with Wisconsin registration ASP1171. The vehicle had sustained extreme fire damage completely damaging the interior of the Civic. A check of that vehicle registration revealed that vehicle belonged to Robinson. Items of Robinson's were discovered in the vehicle, as will be described later in this complaint. Complainant states, on information and belief, that this vehicle is worth more than \$100.

### Robinson's Phone Records

In response to the discovery of the human leg at Warnimont Park, as well as the similar timing of Robinson being reported missing as well as the arson of Robinson's vehicle, Milwaukee County Sheriff's Office Detective Matthew Vandertie obtained records from Verizon Wireless, the servicer for the number belonging to Robinson (414-510-4769). It should be noted that AJ as well as family members of Robinson confirmed that number belonged to her. Detective Vandertie reports that records were received from Verizon that included call detail records, location records, as well as recent text message content. Upon review of the text message content, Detective Vandertie located a text conversation between Robinson and the telephone number 262-416-4874. This was the last text message conversation in the records that contained outgoing messages from Robinson. The

conversation occurred between approximately 4:15pm and 5:18pm on April 1<sup>st</sup>, 2024, and reads as follows:

<u>Sender</u>	<u>Message</u>
4145104769	"Where are we meeting"
4145104769	"I can do 5"
2624164874	"Hmm downtown somewhere?"
4145104769	"Ok"
2624164874	"Brathouse on 3rd?"
4145104769	"Perfect "
2624164874	"Okay Im going to shower quick ill probably get there more around 515"
2624164874	"Are you hungry? Im need to stop at twisted fisherman to pick up my w2 from last year and we could eat there first"
4145104769	"Ok and yes "
4145104769	"Are we eating at the brat house or the other place "
2624164874	"Lets eat at twisted Im feeling seafood"
4145104769	"Yes I love seafood "
2624164874	"Sounds good Im about to leave ill be there soon"
4145104769	"\0O\0k\0 =M<\0 "
2624164874	"Just got to twisted"
4145104769	"Ok are u inside?"
2624164874	"Yes"

Detective Vandertie searched law enforcement databases which showed an association between 262-416-5874 and Maxwell S Anderson, the above-named Defendant. Furthermore, upon checking Milwaukee County Sheriff's Office booking records, the Defendant provided that phone number to the Milwaukee County Sheriff's Office during a booking process in April, 2023. Investigators then checked Wisconsin Department of Transportation records which revealed the Defendant's listed address is 3161 South 39<sup>th</sup> Street in the City of Milwaukee.

Milwaukee County Sheriff's Office Detective John Guillot responded to Twisted Fisherman, located at 1200 W. Canal Street in Milwaukee, to attempt to determine if Robinson went to that location. Detective Guillot recovered surveillance video from Twisted Fisherman. Complainant has reviewed that video as well, and has also reviewed booking photos of the Defendant as well as photographs of Sade Robinson. The video shows, in sum, as follows: at approximately 5:09pm on April 1<sup>st</sup>, 2024, the Defendant enters Twisted Fisherman from the west. His face is clearly visible on the exterior cameras of the restaurant. At 5:20pm, Robinson enters the restaurant from the east, then approaches the bar and sits next to the Defendant. The Defendant and Robinson remain at the bar eating and having drinks together until they leave the restaurant around 6:24pm. They both leave towards the east, which is the direction Robinson arrived from. Robinson is still wearing a black puffy coat, a white shirt, light colored blue jeans multiple tears in front, white shoes, and she is carrying a dark greyish-brown purse. The Defendant is wearing his hair in a ponytail, a red flannel coat with a grey hood, and a black t-shirt with "Carhartt" written in white across the chest, as well as dark jeans. There are no cameras at Twisted Fisherman that depict the parking lot.

Detective Guillot, when recovering the video, spoke to the owner of the restaurant RD who stated that he knew the Defendant as an ex-employee. Detective Guillot also spoke to JR, one of the managers of the Twisted Fisherman. JR viewed the surveillance video and identified the male subject with Robinson as the Defendant who JR knew as a former employee, and further stated the Defendant came in to get his W2 (consistent with the text conversation the Defendant had with Robinson).

Detective Guillot also spoke to BC who was the bartender who served the Defendant and Robinson. BC stated the Defendant initially came in and indicated he was picking up his W2, but then informed BC that he was staying at the Twisted Fisherman to meet a female for a "first date." BC knew the Defendant as a former employee. BC stated that Robinson arrived and sat with the Defendant and they appeared to have casual conversation, before leaving together.

Milwaukee County Sheriff's Office Detective Brian Conte conducted an interview on April 3<sup>rd</sup>, 2024, with ASF, who identified herself as a friend of Robinson. ASF indicated to Detective Conte that she became aware Robinson was missing by seeing it on the news. ASF stated that after she learned Robinson was missing, she accessed Robinson's Life360 app on her cell phone. Complainant knows Life360 is an application that provides location-based services and allows users/subscribers to share their locations with others. ASF stated that upon checking Life360, she observed that Robinson's phone appeared to be in Warnimont Park around 4:33am on April 2<sup>nd</sup>, 2024.

Complainant knows investigators received Life360 records from ASF as well as Robinson's mother SLS. The Life360 accounts belonging to Robinson also is linked to her phone number mentioned above. Complainant has reviewed the information from Life360 and summarizes the location of Robinson's phone as follows (the times indicated below are in military time):

1. 04/01/2024 - 1705 to 1829 hours (1 hour, 24 minutes) near 1126 W Canal St
2. 04/01/2024 - 1829 to 1835 Hours: The device traveled from the area of 595 W Clybourn St to 1137 N Water St (Twisted Fisherman to the area of Duke's on Water)
3. 04/01/2024 - 1904 to 2106 hours (2 hours, 1 minute) near 1215 N Water St (near Duke's on Water)
4. 04/01/2024 – 2106 to 2128 hours: The device traveled from the area of 1215 N Water St to was in the area of S 40<sup>th</sup> and W Oklahoma Ave (Duke's on Water to area of Anderson's residence, 3161 S. 39<sup>th</sup> St)
5. 04/01/2024 & 04/02/2024 - 2128 to 0048 hours (3 hours, 19 minutes) near S 40<sup>th</sup> St & W Oklahoma Ave
6. 04/02/2024 – 00048 to 0138 Hours: The device traveled from S 40<sup>th</sup> St and W Oklahoma Ave to 3335 N Gordon Pl (from the area of Anderson's residence, 3161 S 39<sup>th</sup> St northbound and eastbound to a roadway adjacent to Pleasant Valley Park, near Kern Park, on the Milwaukee River, in Milwaukee's Riverwest neighborhood)
7. 04/02/2024 - 0138 to 0201 hours (23 minutes) near 3335 N Gordon Place
8. 04/02/2024 - 0201 to 0253 Hours: The device traveled from 3829 N Humboldt Blvd to 5252 S Lake Dr (an area where Humboldt Blvd is adjacent to the Milwaukee River, going to Warnimont Park, which is the area where the leg was found)
9. 04/02/2024 - 0324 to 0435 Hours: The device was stationary in the stretch of Warnimont Park that encompasses the location where the leg was discovered
10. 04/02/2024 - 0324 to 0435 hours (1 hour, 11 minutes) near 5152 S Sheridan Dr
11. 04/02/2024 – 0435 hours: Life360 notes the battery of the device has died

Complainant states that on April 4<sup>th</sup>, 2024, investigators with the Milwaukee County Sheriff's Office executed a search warrant on the Defendant's residence at 3161 S. 39<sup>th</sup> Street in Milwaukee. During

the execution of that search warrant, identifiers for the Defendant were located, including packages addressed to the Defendant. Additionally, blood was located on bedding in one of the bedrooms and on the walls leading towards the basement. Several gasoline containers were located in the garage/storage area.

Furthermore, Complainant knows that the Verizon records for Robinson's phone number, which included call detail records and location information of the phone, were analyzed by investigators. The records, consistent with the Life360 information described above, show Robinson's device in the area of Twisted Fisherman when Robinson is with the Defendant at that location. Additionally, the records show the device move to the area of Duke's on Water at approximately 6:30pm, and around 9:20pm, the device is in the area of the Defendant's residence at 3161 S. 39<sup>th</sup> Street. Complainant knows that Milwaukee Police Detective Jake Puschnig reviewed pole camera video footage in the area of Duke's on Water. That footage shows Robinson's Honda Civic arrive at 6:33pm, and at 6:34pm, Robinson exits the driver's door and the Defendant exits the front passenger's door. The two of them then walk across the street and eventually walk in the direction of Duke's on Water. Detective Puschnig also reviewed video footage from Duke's on Water, which depicts the Defendant and Robinson hanging out at Duke's on Water. The pole camera video then shows Robinson and the Defendant return to Robinson's vehicle and drive away at 9:04pm. After that, the phone records show the following:

1. Robinson's phone remains in the area of Anderson's residence until about 12:45am on April 2<sup>nd</sup>, 2024, then between 12:45am and 1am, the device appears to travel northbound and eastbound towards the direction of downtown Milwaukee;
2. From 1am to approximately 1:15am, the phone is in the area of downtown Milwaukee, including the area of Robinson's apartment, before heading northbound consistent with traveling into the Riverwest neighborhood between 1:15am and 1:30am; it should be noted that between these records and the Life360 location information, the phone does not appear to be stationary in this timeframe; (Complainant further notes that Detective Blanchar reviewed video footage from Robinson's apartment complex and confirmed Robinson did not return to her apartment at any point after being at the Defendant's residence on April 1<sup>st</sup>, 2024)
3. By approximately 1:33am, the phone travels north towards the area of Pleasant Valley Park, near N. Humboldt Boulevard and and E. Keefe Avenue (just south of Capitol Drive) where it remains until approximately 2am;
4. From 2am to approximately 2:10am, the phone appears to travel westbound, consistent with being on or near Capitol Drive as it moves west;
5. From 2:12am to approximately 2:20am, the phone moves back eastbound in the area of Capitol Drive;
6. From 2:20am to 2:30am, the phone appears to travel southbound consistent with traveling on Interstate-43;
7. From 2:30am to 2:35am, the phone moves westbound, appearing to travel consistent with Interstate-41/Interstate-894 towards Greenfield;
8. From 2:35am to 2:45am, the phone moves back eastbound, and then southbound consistent with traveling on Interstate-41/Interstate-94, and then traveling eastbound in the area of College Avenue, in the direction of Warnimont Park;
9. From 2:45am to 3am, the phone appears to be east of the airport, in the area of Cudahy and South Milwaukee;
10. The phone then remains in the area of Warnimont Park between 3am and 4:30am;
11. From 4:30am to 4:40am, the phone begins to move northbound towards St. Francis, and then has a final cell tower location record around 4:40am in the area of E. Howard Avenue and WI-794, consistent with the location where Life360 indicates the battery of the phone died.

### Discovery of Human Remains Near 31<sup>st</sup> & Galena Street

On Saturday, April 6<sup>th</sup>, 2024, members of the Milwaukee Police Department began to canvass the area near where Robinson's Honda Civic was set on fire. While searching the area of the 31<sup>st</sup> & Galena Playground (3100 W. Galena Street), Milwaukee Police Detective Cassandra Lindert located a human foot in the wooded area adjacent to the train tracks that border the playground to the east. Investigators located, in addition to the foot, another piece of what appeared to be human flesh in the same area. Complainant has observed the recovered foot, as well as the leg recovered at Warnimont Park, and observed they appeared to be from the same individual, particularly due to skin tone, size, and having matching pink nail polish. The location of where these remains were discovered was approximately one block south of where Robinson's car was set on fire.

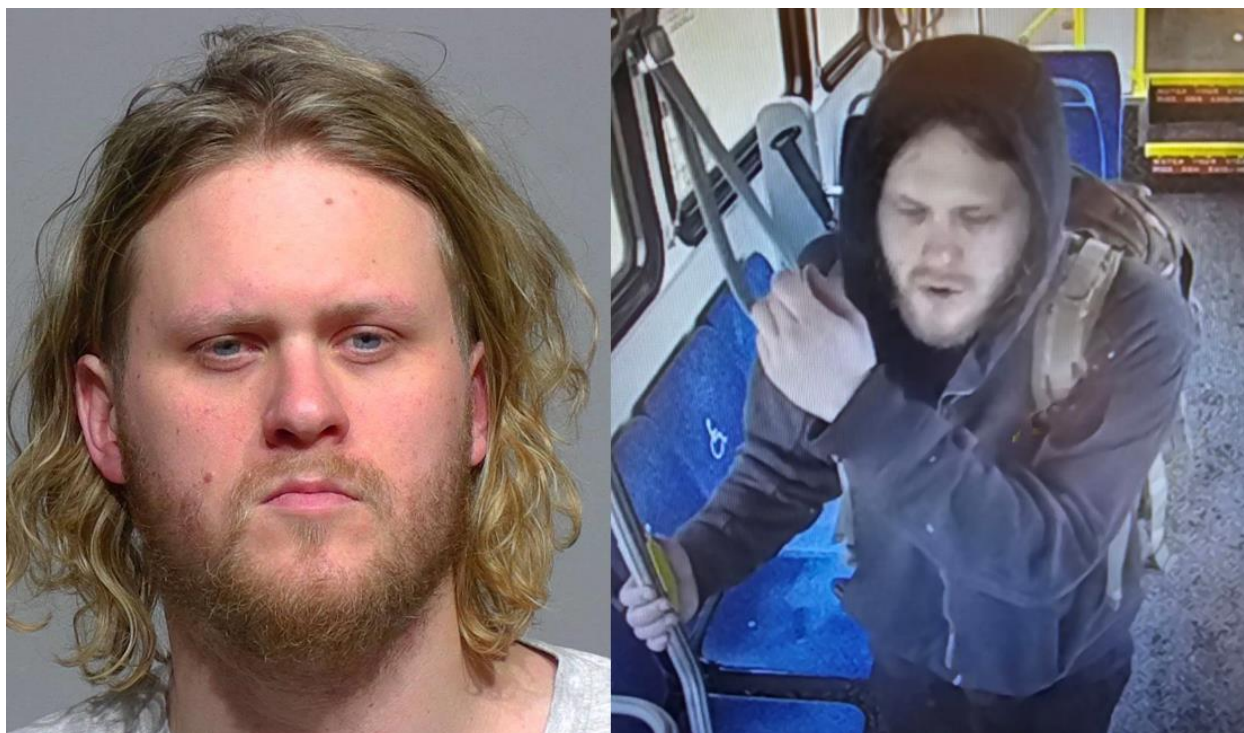
Members of the Milwaukee Police Department attempted to locate video footage regarding either the disposal of the human remains, or footage related to the arson of Robinson's car. Detective Ryan Bergemann obtained video from the Milwaukee County Transit System (MCTS) bus traveling westbound on Lisbon Avenue (MCTS route 57). The video footage depicts the following: the bus stops on the corner of 29<sup>th</sup> and Lisbon Avenue at 7:29am, facing westbound (in the direction of where Robinson's car was set on fire). Two subjects can be seen walking westbound on the north side of Lisbon Avenue, passing Lisbon Liquor & Food Mart—one of these subjects is wearing a blue coat, and the other subject is holding a black and white umbrella. The bus begins to drive forward towards 30<sup>th</sup> Street, at which time the person in the blue coat appears to be checking something out to the north, at which time a different subject can be seen walking through the grass lot towards Lisbon Avenue—the subject is walking away from a fire that is beginning to burn in the parking slab behind the building at the corner of 30<sup>th</sup> and Lisbon. As the transit bus passes the person walking away from the fire, you can see this individual appears to be a white male and is wearing dark pants, a dark grey hooded top, carrying a tan colored backpack with tan straps that appears to be full. As the bus continues to drive westbound on Lisbon Avenue, the burning of Robinson's vehicle is clearly visible. As the bus continues to pass, the subject with the tan backpack can be seen starting to cross Lisbon Avenue, southbound.

Milwaukee Police Detective Andrew Marx recovered video footage from Lisbon Liquor & Food Mart. That footage depicts the subject in the blue jacket and the subject with the umbrella walking westbound on Lisbon Avenue. Upon reaching the vacant lot next to the liquor store, both subjects appear to slow down, at which time the with the tan backpack begins to walk across Lisbon, southbound on 30<sup>th</sup> Street. The person in the blue jacket then appears to be in shock, and begins pointing at the person in the tan backpack as he walks away. The subject in the blue jacket then tries to flag down cars passing by and can be heard on the video yelling "he did that" while pointing across the street to the person with the tan backpack. The subject in the blue jacket also begins yelling for someone to call the fire department.

Investigators were eventually able to identify the subject in the blue jacket as LAD. Detective Vincent Lopez and Detective Thaddeus Schimmels interviewed LAD, who stated the following: LAD was walking down Lisbon Avenue with her friend and saw a white male exit the driver's door of Robinson's Honda Civic. She then observed the white male light a lighter and toss it into the driver's door window of the Honda, then begin walking in LAD's direction, and last saw this white male walking westbound on Walnut Street from 30<sup>th</sup> Street.

Detectives then saturated the area to recover any surveillance footage that would capture where the subject with the tan backpack walked towards after setting Robinson's car on fire. Through that video canvass, detectives learned the subject with the tan backpack walked westbound towards N. 35<sup>th</sup> Street, and then eventually got onto a Milwaukee County Transit System Bus at 8:12am to head southbound on N. 35<sup>th</sup> Street, which is the direction towards the Defendant's residence. The video from

that MCTS bus captured the face of that subject as he boarded and remained on the bus, and through that footage, Complainant has reviewed the Defendant's booking photo related to his arrest on April 4<sup>th</sup>, 2024 (described below). Complainant is able to identify that subject as the Defendant, Maxwell S. Anderson. It should be noted that the footage from the bus shows the Defendant wearing the exact clothing depicted on the subject fleeing the scene of the vehicle arson, including the large tan backpack with tan straps. A depiction of the Defendant's booking photo with the Milwaukee County Sheriff's Office, and the Defendant on the MCTS bus is depicted below:



Detective Ryan Bergeman reviewed the MCTS video showing the Defendant on the MCTS bus. The Defendant boards the bus and pays his bus fare in cash. He then rides that MCTS bus south on 35<sup>th</sup> Street and gets off the bus at approximately 8:35am near S. 35<sup>th</sup> Street and W. Lakefield Drive on Milwaukee's south side. It should be noted there is not a bus stop at this location, and the Defendant asked the bus driver to let him off there. The Defendant then departs the bus and begins to walk northbound. It should further be noted it is approximately an 8 minute walk from that location to the Defendant's residence, and this would be the most logical place to depart the bus to walk to the Defendant's home.

Complainant reviewed surveillance video affixed to a residence across the street from the Defendant's residence (3161 S. 39<sup>th</sup> Street), which was recovered by Milwaukee Police Detective Rachel Smith. This video footage depicts S. 39<sup>th</sup> Street and the front of the Defendant's residence, as well as part of the south side of his residence. There is a front gate on the south side of the residence, and over that gate the rear gate near the alley is also visible. The Defendant can be seen arriving through his back gate that is accessible through the alley behind his house at 8:43am. The arrival at this time is consistent with him having walked to that location from departing the bus. Complainant notes that the Defendant's dark hooded top and tan backpack that appears full are visible in this video.

Complainant knows that Robinson's vehicle was ultimately towed from the location where the Defendant set it on fire, and it was searched by Detective Alexis Krusic of the Milwaukee County



Sheriff's Office and by members of the Wisconsin State Crime Lab. During the search of that vehicle, located in the trunk was clothing that Robinson was wearing on the evening of April 1<sup>st</sup>, 2024—namely the black puffer coat, light blue ripped jeans, and white shoes, along with her dark greyish-brown purse. These items were found in the trunk of the vehicle and were partially fire damaged, although undamaged enough to identify them as the items Robinson was wearing. Also recovered was a remnant of an iPhone, consistent with the type of iPhone Robinson was known to have.

Detective Rachel Smith reviewed additional surveillance video footage from the residence across the street from the Defendant's residence. Her review of that footage revealed the following: at around 9:24pm on April 1<sup>st</sup>, 2024, there is motion near the back gate of the Defendant's property, which appears to swing open, and shadows consistent with two human figures enter the back yard of the Defendant's residence, and at 9:26pm, the living room light in the front of the Defendant's residence (the upper unit) turns on. This would be consistent with the time that Robinson's phone appears to have arrived at the Defendant's residence, as described above, and would be consistent with Robinson and Anderson arriving at his residence together.

At approximately 11:25pm (on April 1<sup>st</sup>, 2024), there is human movement in the back yard again. This movement continues on and off, until approximately 12:45am on April 2<sup>nd</sup>, 2024. This is consistent with the time when Robinson's phone appears to depart from Anderson's residence, and begins to travel around the city of Milwaukee before eventually ending up apparently stationary near Warnimont Park, where the severed leg was recovered. As described above, Robinson's phone does not appear to depart from Anderson's residence between the arrival around 9:24pm on April 1<sup>st</sup> until around 12:50am on April 2<sup>nd</sup>.

Detective Smith also recovered surveillance video from 3174 S. 40<sup>th</sup> Street that depicts the alley (this video does not depict the Defendant's residence, but it depicts the alley that connects to the Defendant's residence). Detective Smith reviewed that video which shows Robinson's vehicle leaving the alley southbound at 12:47am on April 2<sup>nd</sup>, 2024. Detective Smith also recovered video footage from a camera that depicts the intersection of S. 35<sup>th</sup> Street and W. Greenfield Avenue (which is to the north of the Defendant's residence). That video footage depicts Robinson's vehicle heading northbound on 35<sup>th</sup> Street at approximately 12:53am on April 2<sup>nd</sup>, 2024. This movement is consistent with the location of Robinson's phone, as described above.

Complainant knows that on April 4, 2024, at around 1:16am, MCSO detectives Joseph Blanchar and John Guillot conducted a traffic stop of a black Hyundai Santa Fe with license plate AMR8083, which listed in Department of Transportation records to the Defendant. The Defendant was stopped near South 38th Street and West Lakefield Drive, just a few blocks from his residence. The Defendant was arrested at that time. A search of the Defendant's vehicle led to the recovery of a zip-up hooded coat that appears to be the same coat the Defendant is wearing in the still frame depicted above.

Complainant further states, based on preliminary analysis done by the Wisconsin State Crime Lab, that a pseudo-standard of Sade C Robinson was compared to a blood standard from the human leg recovered from Warnimont Park, and the DNA analysis supports the preliminary conclusion that the leg belongs to Sade C Robinson.

Complainant further states that since the Milwaukee County Sheriff's Office and Milwaukee Police Department began the investigation into the severed leg recovered from Warnimont Park as well as the missing person investigation related to Sade C Robinson, no one from her family nor her friends have heard from Robinson, and the last contact anyone has had with her was April 1<sup>st</sup>, 2024. No one has had contact with Robinson since she was with the Defendant on the night of April 1<sup>st</sup>, into April 2<sup>nd</sup>, 2024. Based on the circumstances surrounding the disappearance of Robinson, as described in this

complaint, and the recovery of the human leg that was preliminarily identified as Robinson's, Complainant concludes Robinson is deceased. The facts mentioned in this complaint cause Complainant to conclude that the Defendant intentionally killed and then dismembered Robinson with the intent to conceal the homicide, and it occurred between the arrival at the Defendant's residence and his departure from the Warnimont Park area.

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

**Electronic Filing Notice:**

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

Criminal Complaint prepared by Ian Vance-Curzan.  
ADA Assigned Email Address: [Ian.Vance-Curzan@da.wi.gov](mailto:Ian.Vance-Curzan@da.wi.gov)

Subscribed and sworn to before me on 04/11/24

Electronically Signed By:

Ian Vance-Curzan

Assistant District Attorney

State Bar #: 1092906

Electronically Signed By:

Detective JoAnn Donner

Complainant