

<b>STATE OF WISCONSIN</b>		<b>CIRCUIT COURT</b>	<b>MILWAUKEE COUNTY</b>
<b>STATE OF WISCONSIN</b>		<b>DA Case No.: 2022ML003700</b>	
Plaintiff,		Court Case No.:	
vs.		<b>CRIMINAL COMPLAINT</b>	
TATE, JORDAN M N67W24889 STONEGATE COURT, #103 SUSSEX, WI 53089 DOB: 02/28/1997			
<b>Defendant(s).</b>		<i>For Official Use</i>	

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 Thursday, February 10, 2022, at 524 North Water Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did recklessly cause the death of KNT, 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 Thursday, February 10, 2022, at 524 North Water Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did recklessly cause great bodily harm to JAA, 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 3: FIRST DEGREE RECKLESS INJURY, USE OF A DANGEROUS WEAPON**

The above-named defendant on or about Thursday, February 10, 2022, at 524 North Water Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did recklessly cause great bodily harm to TTM, 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.

**Probable Cause:**

Complainant is a law enforcement officer employed by the City of Milwaukee Police Department who makes this complaint following a review of the records of said Department including among other things the reports of Police Officer Jason Chadwick, Det. Michael Driscoll, PSSI. Michael Braunreiter, PO Brian Wunder, Det. Michael Finkley, Det. Antonio Fitzgerald, Det. Cedric McFadden and Det. Jeffrey Emanuelson.

PO Jason Chadwick reports that at the above mentioned date at approximately 9:50 PM he responded to the above mentioned location, the Brownstone Social Lounge, where he saw a female, KMT suffering from an apparent gunshot wound to the each arm and once in the chest. PO Chadwick reports that in the rear of the location he saw TM, with an apparent gunshot wound in the right upper thigh.

Det. Michael Driscoll reports that he spoke with KTW who stated that she was the manager on duty of the lounge, and that they have a minimum age policy after 9:00 PM. KTW stated that she observed a man at the door denied access because of his age, and that he became belligerent when she tried to explain the policy to him. KTW stated that security began to escort the man out, but that he pulled a gun from his waistband and she then heard several gunshots just after the man was out the front door.

Det. Braunreiter stated that he spoke to JAA at the hospital, who stated he was a security guard at the lounge, that he was escorting the man out as described above, when the man pulled out a gun and started to shoot. JAA reports that he was hit by this gunfire in the stomach and that he then passed out.

PO Brian Wunder reports that he responded to the above mentioned shooting and observed KNT being tended for gunshot wounds. PO Wunder reports that KNT was taken to Froedtert Hospital where she was pronounced deceased.

Det. Melvin Finkley reports that he spoke with TM at Froedtert Hospital, who stated that he worked at the lounge and was escorting a man out with JAA and KNT. TM stated that when they attempted to close the door the man pulled it open and fired multiple shots at them. Det. Finkley reports that TM suffered from a gunshot wound to his right thigh.

PSSI Michael Braunreiter reports that he attended the autopsy of KNT, conducted by Dr. Jessica Lelinski, a medical doctor licensed in the State of Wisconsin and experienced in the field of forensic pathology, who noted 3 gunshot paths, causing five gunshot wounds including one to her right breast which struck both lungs and her liver. Dr. Lelinski determined that these gunshot wounds caused her death and ruled that death a homicide.

Det. Antonio Fitzgerald reports that he recovered a total of 5 9mm casings from the scene outside the lounge.

Det. Cedric McFadden reports that he reviewed the surveillance video recovered from the lounge, noting that the suspect appears on it at 9:49, being pushed from the lounge, that he produces a firearm and once outside fires it repeatedly into the doorway.

Det. Jeffrey Emanuelson reports that he spoke to LCW, who stated that she had been dating her boyfriend, Jordan Tate for the last six years. LCW stated that at the above mentioned date and location they attempted to go into the above mentioned Lounge but were turned away. LCW claimed that she was back near her car following being turned away when she heard gunshots. LCW was shown still photographs from the surveillance video and identified a still photo of the shooter as her boyfriend, Jordan Tate.

\*\*\*\*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 Michael C. Schindhelm.

Subscribed and sworn to before me on 02/28/22

Electronically Signed By:

Michael C. Schindhelm

Assistant District Attorney

State Bar #: 1081589

Electronically Signed By:

Det Jeffrey EMANUELSON

Complainant