

STATE OF WISCONSIN	CIRCUIT COURT	MILWAUKEE COUNTY
STATE OF WISCONSIN	DA Case No.: 2024ML021207	
Plaintiff,	Court Case No.: 2024CF005497	
vs.		
Schwantes, Travis C. 33 East Main Street, Suite 400 Madison, WI 53701 DOB: 07/31/1970	AMENDED CRIMINAL COMPLAINT	
Defendant(s).		
	For Official Use	

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

Count 1: SOLICITING PROSTITUTES as to Victim 2

The above-named defendant on or about Monday, May 29, 2023 and March 31, 2024, at various places in in the City and County of Milwaukee WI, Milwaukee County, Wisconsin, did intentionally solicit a person to practice prostitution, contrary to sec. 944.32, 939.50(3)(h) Wis. Stats.

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

Count 2: MAKING FALSE REPRESENTATION TO QUALIFY FOR ASSIGNMENT OF COUNSEL - PTAC, AS A PARTY TO A CRIME

The above-named defendant on or about Thursday, August 3, 2023, at 819 North 6th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did make a representation on a Wisconsin State Public Defender application that he did not believe to be true for the purposes of qualifying for counsel, contrary to sec. 977.06(2)(b), 939.50(3)(i), 939.05 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.

Count 3: PATRONIZING PROSTITUTES as Victim 1

The above-named defendant on or about Sunday, February 27, 2022, at 2936 West Kilbourn Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, did intentionally enter any place of prostitution with the intent to have nonmarital sexual intercourse with a prostitute, contrary to sec. 944.31 and 944.31(1), 939.51(3)(a) Wis. Stats.

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

Count 4: PANDERING – SOLICITATION as to Victim 2

The above-named defendant on or about Friday, November 24, 2023, within Milwaukee County, Wisconsin, did solicit another to have nonmarital sexual intercourse, in private, which person the solicitor knows to be a prostitute, contrary to sec. 944.33(1), 939.51(3)(a) Wis. Stats.

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

Count 5: MISCONDUCT/OFFICE-ACT/INCONSISTENT DUTY

The above-named defendant on or about Thursday, August 3, 2023, at least in part at 819 North 6th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, while employed as a public employee and who, in his capacity as a public employee exercised a discretionary power in a manner inconsistent with the duties of his employment and with intent to obtain a dishonest advantage for himself or another, contrary to sec. 946.12(3), 939.50(3)(i) Wis. Stats., contrary to sec. 946.12(3), 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.

Count 6: MISCONDUCT IN PUBLIC OFFICE (FALSE ENTRY)

The above-named defendant on or about Thursday, August 3, 2023, at least in part at 819 North 6th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, in his capacity as a public employee, did make an entry in a statement which in a material respect he intentionally falsified, contrary to sec. 946.12(4), 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:

This complaint is based on the joint investigation of the City of Milwaukee Police Department Human Trafficking Task Force and Sworn Law Enforcement Investigators with the Milwaukee County District Attorney's Office. Complainant knows that said investigation was conducted in the normal course of police business. Complainant has relied upon similar reports in the past and found them to be accurate. Said investigation revealed that following individuals CR, GE, DO, WG, LS, and the above-named defendant Travis SCHWANTES were all engaged in patronizing prostitutes. In addition, Schwantes, a criminal defense lawyer solicited at least one woman by repeatedly paying her to engage in the practice of prostitution who he was actively representing, or had represented, knowing she was being trafficked, suffering from drug abuse issues, or other trauma. In addition, during the course of his representation of that person, he engaged in misconduct in public office by falsifying records during his work, which was as a public employee, specifically a lawyer, with the Office of the State Public Defender. Schwantes also engaged in misconduct by exercising a discretionary power in a manner inconsistent with the duties of his employment with intent to obtain a dishonest advantage for himself and another. Specifically, he obtained representation for that person through false pretenses, which would be a dishonest advantage for another. He also placed himself in a position where he would be the defense lawyer for said client despite maintaining a sexual relationship with that person for money illegally, which would be contrary to ethical rules of lawyer conduct and contrary to the policies of the Office of the State Public Defender. The below VICTIMS and witnesses identified by initials were adults at the time of the illicit conduct described throughout the complaint.

BACKGROUND INVESTIGATION INTO THE APARTMENT BUILDING ON 29th & KILBOURN

In two separate meetings with law enforcement agents in April and May of 2022, a known subject, identified herein as SM, came forward to report prostitution activity at an apartment building located at 2936 W. Kilbourn Avenue, in the City of Milwaukee, County of Milwaukee. SM reported being addicted to cocaine and other drugs since a car accident in 2000. Through her drug addiction, SM met a woman, hereinafter identified as VICTIM 1. VICTIM 1 provided cocaine to SM, initially in exchange for money. SM learned that VICTIM 1 was making a significant amount of money in the City of Milwaukee through prostitution. SM became interested in working for VICTIM 1.

In January of 2022, VICTIM 1 brought SM to Milwaukee to VICTIM 1's apartment building located at 2936 W. Kilbourn Avenue. Inside of VICTIM 1's apartment, there was a "play room". The "play room" had various sex toys and other items such a massage table that would be used in acts of prostitution. VICTIM 1 attempted to set SM up with "dates" but SM initially declined to participate and returned home.

In March of 2022, SM decided to return to Milwaukee and work for VICTIM 1. VICTIM 1 tasked SM with oversight of VICTIM 1's advertising and price menus on VICTIM 1's websites. VICTIM 1 used the platforms Skip the Games, Only Fans, and Erotic Monkey to advertise VICTIM 1's services. SM believed that VICTIM 1 was making upwards of \$30,000 per month.

SM began to engage in prostitution acts 3-4 times per day out of VICTIM 1's apartment, often in exchange for crack cocaine from VICTIM 1. Together, SM and VICTIM 1 devised a sex menu for SM to advertise online on a variety of websites. VICTIM 1 would keep all of the money SM made, but would provide SM with crack. SM recalled some of her clients being a judge, a microbiologist, and multiple airline pilots.

Based on the information provided by SM, law enforcement examined the website Skip the Games and located an advertisement for SM's services with a phone number that VICTIM 1 identified as her number in a later interview, which is consistent with SM working for VICTIM 1. Posts on SM's page included names of multiple other individuals who were offering prostitution and specific sex acts which they would charge people for which would happen within the apartment mentioned above.

INTERVIEW OF VICTIM 1

In October of 2023, VICTIM 1 was interviewed. VICTIM 1 stated that she has been prostituting for the past four and a half years and has a sex room in her apartment using the business moniker of "Iranian Princess Fetish Services." Other prostitutes also use VICTIM 1's apartment and identified a total of five different females who engaged in prostitution inside of VICTIM 1's apartment, including SM. VICTIM 1 had a list of clients whom VICTIM 1 provided prostitution services to several individuals in the Milwaukee area and several attorneys, including a Public Defender.

IDENTIFICATION OF DEFENDANTS

VICTIM 1 supplied information about her customers, prompting investigators to initiate open-source searches, and other databases to ascertain the identities of the individuals involved in the cases where VICTIM 1 lacked knowledge of their first and last names. On 02-12-2024, based on the information above, a 25-person and 6-dwelling photo document was compiled. The array included the below sex customers, photographs of customer's homes, other prostitutes, VICTIM 1's acquaintances, and 5 white

male filler photographs found through a google photo query of “white male attorneys”. The following suspects were included in the photo array that VICTIM 1 identified:

- 1) VICTIM 1 provided specific information about defendant SCHWANTES including his first and last name, his occupation as an Attorney for the Office of the Public Defender, and the size of his vehicle.
- 2) GE was included in the photo array because of VICTIM 1’s description of a “retired municipal judge” resulted in a LinkedIn page, titled: GE – Retired judge – Self-Employed”. VICTIM 1 described the Judge being named, [G] with pocked marked face and gray hair combed over, who lives in a town house, near Racine, with garage doors in the middle.
- 3) CR was included because VICTIM 1 provided both the first and last name of CR and that he drove a silver BMW. DOT confirmed the CR owned a silver BMW. VICTIM 1’s description of CR resembled his DOT photograph, which was placed in spot 15 of the photoarray.
- 4) DO was included VICTIM 1 provided detailed information as to DO’s description, such as natural curly hair, short, and that he worked in a public safety capacity. Moreover, she provided detailed information as to the location of DO’s home in the area and that it had a glass door and was blue. A Google search showed that VICTIM 1’s description was consistent with the color and glass door of the house when DO’s address was checked. His employment was also confirmed.
- 5) WG was included because VICTIM 1 provided WG’s first and last name and occupation as a lawyer. Officers were able to confirm WG’s identity.
- 6) LS was included because VICTIM 1 provided the nickname of Stu and the specific occupation of being a Funeral Director and a check of the ME’s Office identified a possible person named LS who is associated with an operation in Oak Creek, which a google searched showed as being consistent with LS’s listed employment.

VICTIM 1 also was able to provided physical descriptions of all the above people which were consistent with the images found through open source records and other data bases. Again, Images of these people were compiled in a 25 person photo array and a property photo array of the residence VICTIM 1 said acts of prostitution were completed in exchange for money.

In February 2024, law enforcement met with VICTIM 1 and showed her the persons and property photograph array. VICTIM 1 was asked to identify anyone and any home that she recognized. VICTIM 1 identified the following people that paid her for nonmarital sexual encounters:

- Photograph 25, LS – VICTIM 1 identified this photo as LS. LS had paid cash for sex dates. She stated they had sex in Apartment 9 at 2936 W Kilbourn in the City and County of Milwaukee Wisconsin and at the LS’s workplace in Milwaukee County, Wisconsin. The sex dates occurred between 2022 and 2023 every two to three weeks during this timeframe.
- Photograph 24, WG – VICTIM 1 identified this photo as WG. VICTIM 1 stated that WG paid her for sex between 2020 and 2022 at 2936 W Kilbourn in the City and County of Milwaukee Wisconsin
- Photograph 12, DO – VICTIM 1 identified him as a public safety worker. According to VICTIM 1, DO continued to date JB. VICTIM 1 stated that JB lived in the same building as her and would perform “duos” with her. VICTIM 1 stated that DO would pay for sex dates with VICTIM 1 from 2021 until August of 2023. The sex dates occurred at 2936 W Kilbourn in the City and County of Milwaukee Wisconsin, and DO’s home at as discussed above in the City and County of Milwaukee, Wisconsin. VICTIM 1 stated that DO paid her for sexual intercourse on about six different occasions. The usual amount was for \$260 via Paypal.
- Photograph 15, CR – VICTIM 1 identified him as Chris CR. VICTIM 1 stated that CR would send Amazon.com gift cards to her. VICTIM 1 recalled CR’s email was linked to CR’s cash app.

- Photograph 16, GE, VICTIM 1 identified him as the Judge. VICTIM 1 stated that she used to drive to the Judge's house when his wife was in Florida. VICTIM 1 knew this customer was a Judge because affixed to the wall inside the house was a plaque that identified his occupation. VICTIM 1 stated that during the visits, the Judge wanted to role play. The Judge regularly paid her \$300.00 cash for two (2) hours of service for her sexual services. She added that the Judge would text her phone a lot, rambling on with his messages. VICTIM 1 last saw the Judge in 2023, making the total number of sessions with him around six (6) times. During these, VICTIM 1 would not have to get undressed at all.
- Photograph 17, Travis Schwantes. VICTIM 1 stated, while tapping on Schwantes' face, "I believe it's this one" and commented that she has only seen him twice. During the interviews with VICTIM 1, she stated that Schwantes contacted her and paid her for sex on two occasions. The first incident was in the area of N 45th and W. Congress St in the City and County of Milwaukee, Wisconsin. Records would reveal it began in 2019. VICTIM 1 stated that Schwantes told her that he worked for the Public Defender's Office. Schwantes advised VICTIM 1 on how to thwart law enforcement to continue her operation of prostitution and specifically told her that she was doing everything right by working during the day and coming out to get the customers and bring them into the residence. VICTIM 1 stated that the first time he paid her for sexual intercourse it was with cash. VICTIM 1 stated that Schwantes contacted her again in 2022 via text message and again identifying himself as a public defender.

Schwantes drove to VICTIM 1's address at 2936 W Kilbourn in the City and County of Milwaukee Wisconsin. On that occasion, they engaged in sexual intercourse and Schwantes wore a condom. Schwantes again paid in cash. Schwantes and VICTIM 1 spoke again about the advice he gave VICTIM 1 to avoid getting caught by law enforcement.

- Photograph 28, DO's home. VICTIM 1 stated that this belongs to the public safety worker.
- Photograph 30, GE's home. VICTIM 1 stated that this belongs to the Judge.
- Photograph 32, SM's home. VICTIM 1 stated that Schwantes paid her to have sex for the first time.

ARREST OF DO

On 03-22-2024, Law Enforcement arrested DO inside his home. DO was in possession of an iPhone in a black Otter box case. In plain view was a white iPad in a black Speck case. These two items were seized and placed Inventory. That same day a search warrant for the digital contents contained in DO's iPhone was executed. Upon examination the following pertinent information was discovered:

DO frequently visited sex dating websites that VICTIM 1 had used to advertise on, such as: tryst.com, skipthegames.com, eroticmonkey.com, and onlyfans.com.

In DO's contact list, the following two contacts confirmed his association with the 2936 West Kilbourn Avenue building. Moreover, it confirmed VICTIM 1's statement. The names were:

- [VICTIM 1's nickname¹] with phone number the belonged to VICTIM 1.
- Jana [JB's nickname] with phone number belonging to JB.

¹ VICTIM 1 used a nickname and that same nickname is referenced throughout the complaint.

In DO's text threads, it was apparent that he had completed multiple sexual encounters for money. The prostitutes either went to his house or he went to theirs (out calls / in calls). The dates of these events occurred on or about 12-15-2022 to just hours prior to his arrest on 03-22-2024.

Lastly, a review of Google searches show DO may have been tipped off as to law enforcement investigating him as the information recovered showed the following searches on 03-21-2024:

- I. Affordable criminal defense attorney Milwaukee
- II. Charges with solicitations in Wisconsin
- III. Wisconsin statute of limitations for solicitation
- IV. How to beat a solicitation charge
- V. What happens if you are charged with solicitation

Based on the statements of VICTIM 1 and the evidence discovered as a result of the arrest and search of DO, he engaged in six acts of nonmarital sexual intercourse in exchange for money between 2021 and August of 2023 with VICTIM 1 at 2936 W Kilbourn and his home all within the confines of Milwaukee County, Wisconsin.

ARREST AND MIRANDA OF LS

On March 27, 2024 law enforcement located and arrested LS at his place of employment. A custodial search revealed a phone inside LS's shirt pocket that was placed on inventory.

Subsequent to LS's arrest, law enforcement conducted a custodial interview. LS stated, in part, that he knows VICTIM 1 and discovered her from skipthegames.com website a couple years ago. He has had sex with VICTIM 1 every 2 – 3 weeks for a couple years in exchange for \$200.00 cash. LS knows VICTIM 1 as by a nickname that she uses. LS goes by the name "Stu". LS had sex with VICTIM 1 at 2936 West Kilbourn Avenue and sometimes had two prostitutes while paying an additional fee. LS remembered VICTIM 1 going to his funeral home but didn't recall having sex with her there. LS communicated with VICTIM 1 through a text app.

SEARCH WARRANT OF LS's CELL PHONE

A warrant was authorized for LS's phone and the contents were extracted. Upon examination, law enforcement discovered that LS frequently visited sex dating websites that VICTIM 1 and others advertise on. These websites were: skipthegames.com, eroticmonkey.com, and onlyfans.com. Between 12-28-2023 through 03-27-2024, LS frequented skipthegames.com 5,796 times. Between 01-03-2024 through 03-21-2024, LS frequented eroticmonkey.com 265 times. LS's autofill had the same nickname that VICTIM 1 uses and was used on 09-28-2022 and 11-06-2023. LS's contact list had "[VICTIM 1 nickname] – Arcade" with a mobile 407-982-9224. LS's GPS log showed that on 03-01-2024 in the 5:00 pm hour, he was at 2936 West Wells Street. This is directly one block south from VICTIM 1's sex apartment. LS's visited "Iranian Princess Fetish Services, LLC" website on 01-05-2024 at 3:49 pm.

Based on the statements of VICTIM 1 and the evidence discovered as a result of the arrest and search of LS he engaged in repeated acts of nonmarital sexual intercourse in exchange for money, once every two to three weeks during 2022 through 2023 with VICTIM 1 at 2936 W Kilbourn in the City and County of Milwaukee Wisconsin and at the LS's place of employment in Milwaukee County, Wisconsin.

ARREST AND MIRANDA OF CR

On 04-03-2024, law enforcement located then arrested CR and seized CR's phone. CR was mirandized and CR identified a photo of VICTIM 1 and knew her by the same nickname identified by others. CR identified VICTIM 1 apartment building at 2936 West Kilbourn Avenue where he visited her many times over the course of approximately the last two (2) years. He stated that last time he was there was in September 2023. In exchange for money sent through Venmo, VICTIM 1 would perform certain acts on CR. He also sent eGift Cards to VICTIM 1 and other gifts, such as chocolates. In addition to VICTIM 1, CR stated there was another female there. When shown the photobook, CR pointed to the photo of JB and believed that she was the other woman. CR stated that he communicated with VICTIM 1 via cell phone. When asked for consent to search his phone, CR initially refused, but later provided consent. CR also provided information that indicated he was being blackmailed.

Upon her arrest in October of 2023, VICTIM 1 did not possess her cell phone and believed it to be in the possession of MM, the brother of PM who is VICTIM 1's boyfriend. While in custody, VICTIM 1 received phone calls from MM using VICTIM 1's phone number.

Detective Flores further confirmed that MM used VICTIM 1's phone number to contact other family members who were in custody during July of 2024, establishing that MM continued to possess and use VICTIM 1's cell phone.

During the investigation of this matter, one of the male suspects arrested for purchasing sexual services from VICTIM 1 reported that he was being blackmailed. The suspect received multiple phone messages demanding \$3,000 be paid to an account using CashApp, Venmo, or PayPal. If the \$3,000 was not paid, videos of the suspect with VICTIM 1 would be released and sent to the suspect's business partners.

Detective Flores conducted follow up investigation, including multiple search warrants, which established that the email accounts and money application accounts all were associated with MM.

Based on the statements of VICTIM 1 and the evidence discovered as a result of the arrest and search of CR he engaged in repeated acts of nonmarital sexual gratification in exchange for money once a week during 2021 through 2023 with VICTIM 1 at 2936 W Kilbourn in the City and County of Milwaukee Wisconsin.

ARREST AND MIRANDA OF WG

On April 11, 2024 Law Enforcement arrested WG. WG was in possession of an Android Phone. WG provided a Mirandized statement and WG gave consent for law enforcement to examine his phone for evidence. WG, in part, stated that he met VICTIM 1 a couple years ago through a website. Over the course of time, WG believed that he was in love with her. WG recalled buying a cellular phone for VICTIM 1. WG stated that he is a recovering alcoholic and has been clean since September 2022 and is affiliated with the Salvation Army. WG first met VICTIM 1 at a location other than her apartment at 2936 West Kilbourn Avenue but couldn't recall the exact location. WG stated that he spent time at the apartment and would see VICTIM 1 for companionship / cuddling and to take a break from his wife as well as using her apartment to sleep. WG stated that VICTIM 1 told WG about her sex clients, describing them as public safety workers and lawyers. WG stated that he went to VICTIM 1's address on Kilbourn numerous times. WG stated that he would go there sporadically.

A review of the information obtained from WG's phone showed that there were two pertinent contact entries in WG's phone: Friend: VICTIM 1 (Facebook Messenger Account) and Friend: VICTIM 1 (Facebook Account)

In addition, there were the following example of one of the many chats/text messages consistent with prostitution:

On 04-11-2024, WG corresponded with "Scarlett Jones"

Scarlett Jones: When you reach home baby ask for it baby.

WG: Sounds good but send me something now.

Scarlett Jones: (sent a provocative photo showing a large portion of the right side of her breast)

WG: I will admit you are really beautiful. I don't really like p***. Are you okay with me you know fantasizing that night?

WG: Well the only thing I have till payday is my dick.

Scarlett Jones: I will get a ride or Uber to get there baby

WG: I'll eat meet you at 8000 West Van Back. And then we'll walk to my house it's real short.

Scarlett Jones: Honey get me Apple Card 25\$ when you are coming for work baby

WG: Sorry I only have 14 cents in my account right now. You either come because you want to or you don't come at all. If it works you will have control of every dollar. If we get married I will simply hand you my paycheck and expect you to take care of the household in a responsible manner. Otherwise no money. And giving it to you now would make me feel like a trick or John.

WG: But you know I'm not your average schmuck. I have a couple of dates set up this weekend that I got to have money for. So unless you're ready to sweep me off my feet without asking me for money. I am not interested.

WG: Are you good house keeper, are you a good cook? Are you looking to be my housewife and sex slave?

Based on the statements of VICTIM 1 and the evidence discovered as a result of the arrest and search of WG he engaged in repeated acts of nonmarital sexual intercourse in exchange for money on or as recently as April 11, 2024 at 8000 West Vanbeck in the City and County of Milwaukee Wisconsin. There are also numerous other contacts as described above involving prostitution with other individuals. Especially when looked at in context of all the other evidence.

INTERVIEW OF GE

On September 3, 2024, law enforcement interviewed GE regarding his involvement with VICTIM 1 and prostitution at his home. During the interview at GE's home law enforcement noted various decorations that indicated GE had occupied a role as a judicial figure. GE was shown photographs of VICTIM 1 and stated that he recognized them. He also recognized the name, that VICTIM 1 used as a nickname. He acknowledged that he paid VICTIM 1 about \$200.00 per hour to engage in acts of prostitution. GE also had sex with other women when his wife was away in Florida. GE stated that he would discover the woman by browsing through websites where they advertised. Regarding VICTIM 1, GE paid cash and hired VICTIM 1 multiple times beginning in 2021 and ending in 2022. GE would request VICTIM 1 to come to his residence to perform these acts.

Based on the statements of VICTIM 1 and the evidence discovered as a result of the arrest of GE, he engaged in approximately six acts soliciting of nonmarital sexual gratification or intercourse during 2020 through 2023 with VICTIM 1 who was contacted at 2936 W Kilbourn in the City and County of Milwaukee Wisconsin and his own residence at 6725 105th St. in Pleasant Prairie, Wisconsin.

WARRANT ISSUED FOR CELLPHONE DATA OBTAINED FROM SCHWANTES

In April of 2024 law enforcement obtained a search warrant for historical cell phone information for Schwantes's cell phone number. The warrant return confirmed the subscriber as Schwantes. The call log demonstrated numerous phone contacts between Schwantes and Victim 1 on the following dates: Thursday, January 24, 2019, starting at 3:59 PM (the cell tower data is consistent with Schwantes being at the Public Defender's Office inside the State Office Building); Friday, July 9, 2021, at 4:09 AM (Schwantes contacted RS); Sunday, June 6, 2021, starting at 5:27 PM through 9:02 PM (a total of five phone contacts are exchanged between Schwantes and RS, with Schwantes initiating the contact); Sunday, August 8, 2021 at 3:40 PM, Schwantes contacted Victim 1 (a total of three phone contacts were exchanged between 3:40 PM and 3:47 PM); Tuesday, February 22, 2022 at 10:46 PM, Schwantes contacted Victim 1(a total of two phone contacts were exchanged between 10:46 PM and 10:50 PM); Saturday, February 26, 2022, at 7:10 PM, Schwantes contacted Victim 1(a total of ten phone contacts were exchanged between Schwantes and Victim 1 from 7:10 PM and 8:20 PM); and Sunday, February 27, 2022, at 2:11 PM, Schwantes contacted Victim 1(a total of sixteen phone contacts were exchanged between 2:11 PM and 6:02 PM).

The number of phone contacts, timing of the phone contacts, and date ranges of the phone contacts all corroborate the disclosure of Victim 1 to investigators. The fact that Schwantes initiated almost all of the phone contacts is further corroboration of RS's disclosure regarding Schwantes's motive for contacting RS.

On April 24, 2024, Investigators obtained a warrant for GPS location data for the phone number associated with Schwantes applied for a search warrant for GPS location data to be provided from Schwantes's phone number. Investigator Newport reviewed the GPS data returned as a result of the warrant which showed that on February 27, 2022, Schwantes's phone was at the Office of the State Public Defender and moved to RS's apartment, consistent with RS's disclosure that the last sexual encounter for money with Schwantes occurred at RS's apartment.

On May 7, 2024, City of Milwaukee Police applied for a search warrant to seize and examine Schwantes cell which included a privilege review team as to not violate privileged communications between Schwantes and clients. City of Wauwatosa Detective Bradley Isaacson served as a member of the review team to screen the contents of Schwantes's phone after the phone was seized pursuant to a search warrant. Upon reviewing the contents of Schwantes's phone, Detective Isaacson discovered a number of images and videos (121 total) that he deemed to not be privileged lawyer/client material. The photos and videos were reviewed by Schwantes and his counsel prior to the images being turned over to investigators. Upon being turned over to investigators, a number of women in the images and videos were identified.

Schwantes also kept a list of individuals with whom he was engaging in nonmarital intercourse. The list includes the following relevant names were identified by first name:

- VICTIM 2 secret
- VICTIM 3 secret
- Witness 2 secret
- Witness 1 secret

The list was located in the notes in Schwantes' phone with the title "How many of my physical relationships been a secret." There are 21 listed relationships and 13 that are secret.

Also in Schwantes' Notes section of his phone was the following note that implies the admission of engaging with prostitutes:

Title: Why do I think about

Body: Why do I think about. Paying money for sex? What is the impulse? A different body. A different way of being touched. But not love. Crushing sadness and despair. Loss. This shows Schwantes acknowledging paying for sex.

RS'S APARTMENT AND REINTERVIEW OF RS

In November of 2023, RS's apartment was searched subject to a warrant and revealed a sex room containing various and atypically numerous sex toys and items that complainant knows to be used for sexual gratification.

In January of 2024, Victim 1 met with law enforcement and provided a full statement regarding the prostitution operation inside RS's apartment. Victim 1 has been involved in prostitution since 2018. Since 2020, Victim 1 has used her apartment as a sex room for prostitution. RS's monthly income from prostitution ranged from \$10,000 to \$16,000. Drug use was common in the apartment complex, and in 2023 Victim 1 began smoking crack cocaine. During the meeting, Victim 1 identified one of her prostitution clients as Assistant State Public Defender Schwantes. Victim 1 believed the first time Schwantes paid Victim 1 in exchange for penis to vagina sex was in late 2018 or early 2019. Schwantes used his name to identify himself and informed Victim 1 that he was an attorney with the Public Defender as an apparent means to gain RS's trust. Victim 1 stated that Schwantes provided advice to RS, instructing Victim 1 on how to run her operation correctly to thwart detection by law enforcement.

Schwantes had penis to vagina sexual intercourse with Victim 1 in exchange for money a second time in 2022. This time Schwantes contacted Victim 1 via text message and identified himself as Travis from the Public Defender's Office. Victim 1 provided the address to her apartment and Schwantes subsequently drove to RS's apartment.

At the conclusion of the interview, Victim 1 said, **"I didn't get arrested, I was rescued!"**

RS was subsequently charged and convicted for keeping a place of prostitution in relation to the above conduct. At sentencing, RS's attorney represented that she was a victim of sex trafficking during the above time periods.

Based on the statements of Victim 1 and the evidence discovered as a result of the search warrant show that Schwantes engaged in two prostitution dates involving penis to vagina intercourse on January 24, 2019 and February 27, 2022 with Victim 1 at two different locations in the City and County of Milwaukee. The February incident was located at 2936 W Kilbourn in the City and County of Milwaukee Wisconsin.

VICTIM 2 PROVIDES A DETAILED STATEMENT OUTLINING SCHWANTES INVOLVEMENT IN PROSTITUTION WHILE ALSO REPRESENTING VICTIM 2

During an examination of Schwantes phone, law enforcement observed that one of the photos was a screenshot of a woman from the website Erotic Monkey. The Erotic Monkey website advertises as "your discreet source for quality escort reviews". Law enforcement was able to identify the person in the photo as a known person, hereinafter Victim 2.

On August 2, 2024, Victim 2 was interviewed. Victim 2 stated that she has known Schwantes since 2022. Victim 2 was involved in nonmarital prostitution and Schwantes responded to Victim 2 prostitution advertisement. Schwantes met Victim 2 in a hotel in Milwaukee County and paid \$300 for penis to

vagina sexual intercourse.² Victim 2 believed she had numerous prostitution dates with Schwantes, where Schwantes typically paid cash, \$300, in exchange for penis to vagina sexual intercourse with Victim 2. Victim 2 was familiar with Schwantes's apartment, and identified the apartment building to investigators. Victim 2 stated that she went to Schwantes' Milwaukee based residence for 6 to 10 sexual encounters in exchange for money. Victim 2 stated that Schwantes paid for sexual services over a dozen times between 2022 and 2024.

Victim 2 stated that she knew Schwantes was married, later divorced, and sought to be a circuit court judge in Milwaukee County. In the summer of 2023, Victim 2 had three criminal cases that were in warrant status, one in Milwaukee County and two Waukesha County. Victim 2 stated that during the prostitution dates with Schwantes, Schwantes advised Victim 2 that he could help her in his capacity as an Assistant State Public Defender to clear her warrants in each county.

A review of the filings in one of Victim 2 criminal cases shows that on August 7, 2023, a letter was filed in Victim 2 open Milwaukee County case by the Office of the State Public Defender. The letter indicated that Schwantes was appointed as Victim 2 attorney. At the time the letter was filed, Victim 2 Milwaukee County case was in warrant status for over five months. The case would remain in warrant status for an additional eight months after the letter was filed with the court. During this time frame, Schwantes continued to have penis to vagina sexual intercourse with Victim 2 in exchange for money. Victim 2 was addicted to heroin during the same time frame. Though Victim 2 did not use drugs in front of Schwantes, Victim 2 believed that Schwantes knew of Victim 2 addiction because Schwantes used that information in Victim 2 Milwaukee County case to explain why Victim 2 failed to appear for court.

In March of 2024, Victim 2 was apprehended on the open warrants and Schwantes would appear on her open case in Milwaukee County. Schwantes represented Victim 2 until his cell phone was seized and he took a leave of absence from the Office of the State Public Defender in April of 2024. The case charge, a misdemeanor, was not the type of case typically handled by Schwantes. Victim 2 disclosed that all prostitution acts with Schwantes occurred either at Victim 2 apartment, a hotel, or Schwantes apartment, all of which Investigators have confirmed are located in Milwaukee County and the timeframe is confirmed via electronic payments such as CashApp or Venmo.

Based on the statements of Victim 2 and the materials recovered from the phone belonging to Schwantes along with the below financial records, Schwantes did engage in nonmarital sexual intercourse in exchange for money with Victim 2 over a dozen times between 2022 and 2024 at various places within Milwaukee County including the home of Schwantes. How many counts I think we should do a few counts for this and make the time frame stop for the pandering at the time he starts representing her and then making the soliciting for the time frame to include the pandering time and the representation time.

This shows Schwantes engaged in pandering on May 29, 2023; June 5, 2023 which would be prior to the representation of her in Milwaukee and he pays her \$250 each time.

VICTIM 3 PROVIDES A DETAILED STATEMENT OUTLINING SCHWANTES INVOLVEMENT IN PROSTITUTION

Schwantes's phone also included a set of videos of a woman inside of Schwantes's apartment. In one of the videos, the woman is dancing in a state of partial undress. The woman is holding a lighter in one hand and a glass pipe used to ingest illicit substances in her other hand. Investigators Newport and Blomme confirmed the identity of the woman.

² During the interview with Investigators, Victim 2 confirmed that the hotel was being used by Victim 2 was specifically for engaging in prostitution with multiple different clients and therefore meets the definition of a "place of prostitution" under Wisconsin law. Additionally, Victim 2 confirmed that she used her apartment, a known address in the County of Milwaukee, as a place of prostitution.

The woman, hereinafter identified as VICTIM 3, was the victim of a prior sexual assault. The person who assaulted her was later represented by Schwantes on a sexual assault case involving a different victim. Within Schwantes phone, his work calendar listed an appointment with VICTIM 3 on August 24, 2022, from Noon – 1:00 PM.³ The images and videos of VICTIM 3 inside of Schwantes's phone are from November 23, 2023. Prior to November 24, 2023, there are text messages between Schwantes and VICTIM 3 that are sexual in nature and demonstrate that Schwantes intended on paying VICTIM 3 for sex on November 24, 2023.

On August 28, 2024, Milwaukee County District Attorney's Office Investigators met with VICTIM 3. VICTIM 3 identified a photograph of Schwantes. VICTIM 3 admitted to having nonmarital penis to vagina sexual intercourse with Schwantes on five to six separate occasions in exchange for money, all of which occurred in the County of Milwaukee. These incidents include but are not limited to the general locations of 1) S 1st St and W. Washinton St. and 2) N 46th St. and W. Martin Dr. within the City and County of Milwaukee, Wisconsin. VICTIM 3 knew Schwantes because she advertised sexual services on websites called Secret Benefits and Sugar Daddy; Schwantes was a customer. The first time they met was in the Spring of 2022. During this encounter, Schwantes identified himself as a Public Defender. VICTIM 3 identified herself in the videos recovered from Schwantes's phone and confirmed that Schwantes made the videos inside his apartment on November 23, 2023.

VICTIM 3 never shared her name or personal identifying information with Schwantes, such that he would know her prior history as a victim of sexual abuse. VICTIM 3 recalled during one of the occasions that she had sex with Schwantes in exchange for money, Schwantes shared that he "put him away", referring to the person who Schwantes represented who previously sexually assaulted VICTIM 3, in an apparent effort to take credit for the sentence and gain the allegiance and trust of VICTIM 3. The person who assaulted VICTIM 3 was acquitted at trial, however, that person was charged and convicted of a sexual assault of a child in a 2017 Milwaukee case. This person, whom was represented by Travis Schwantes in the 2017 Milwaukee child sexual assault case, received a sentence of 45 years in the Wisconsin State Prison System, 25 years initial confinement and 20 years extended supervision from a plea deal. VICTIM 3 had no involvement in this 2017 case. Given that VICTIM 3 stated that she did not share her information, your complaining witness believes that the only way Schwantes could connect VICTIM 3 to that offender was through the internal records of the Office of the State Public Defender, as VICTIM 3 never shared her identity with Schwantes, and even if VICTIM 3 did, VICTIM 3 never shared her sexual assault history – meaning Attorney Schwantes used protected information from the Office of the State Public Defender for his personal gain.

Based on the statements of VICTIM 3 and materials recovered from the phone belonging to Schwantes along with the below financial records, Schwantes did engage in nonmarital sexual intercourse in exchange for money with VICTIM 3 5 to 6 times between 2022 and 2023 at various places within Milwaukee County including the home of Schwantes.

SCHWANTES REPRESENTS Witness 1 AS A COOPERATING WITNESS ON A HOMICIDE AND HAS SEX WITH Witness 1 WHILE THE CRIMINAL CASE IS PENDING

The phone of Schwantes establishes a long-standing pattern of engaging in prostitution with a number of women spanning a number of years the phone evidence also contained what appeared to be a list of persons Schwantes had sex with and included a person with a very distinctive first name of a known person, hereinafter Witness 1, who was a cooperating witness in a homicide investigation Schwantes represented on a homicide case.

³ Schwantes paid VICTIM 3 \$300 on August 24, 2022. The payment is for "birthday cake". August 24th is Schwantes's birthday.

The alleged facts of that homicide were that on July 13, 2019, the body of a known identified male was found deceased inside of his residence. The man died as a result of multiple gunshot wounds to the head and chest. The man's residence was ransacked and his car was missing. Dr. Jacob Smith MD, a forensic pathologist with the Milwaukee County Medical Examiner's Office, performed an autopsy on the body of the identified male and ruled the death a homicide.

City of Milwaukee Homicide Detectives were able to link Witness 1 to the man's death. Witness 1 was involved in a relationship with a person whom Witness 1 identified as her wife. Witness 1's wife would arrange for Witness 1 to have sex with men in exchange for money.

On July 9, 2019, Witness 1's wife arranged for Witness 1 to have sex with the identified male that was later discovered shot to death inside of his residence. Meaning Witness 1 was trafficked by her wife. Witness 1, along with her wife, were both inside of the identified male's residence during the prostitution date. Witness 1 informed detectives that the identified male became rough with Witness 1 during sex, choking Witness 1 and forcing her legs open. Witness 1 got away from the identified male and ran into the bathroom. Shortly thereafter, Witness 1 heard the sound of gunshots. Witness 1's wife instructed Witness 1 that they needed to rummage through the identified male's residence and make it look like a burglary.

LW, along with her wife, staged the crime scene, took some of the identified male's belongings, and fled the scene in the identified male's car.

On July 26, 2019, Schwantes, employed by the Office of the State Public Defender's Office at the time, provided advanced representation to Witness 1 in the homicide investigation of the identified male. This means that the office of the state public defender provided Witness 1 a lawyer because it was determined that she may need or be entitled to legal representation because of her illegal conduct regarding the trafficking. Witness 1 signed an agreement to provide a truthful statement to City of Milwaukee Homicide detectives involving the circumstances surrounding the death of the identified male. Witness 1's statements inculpated her wife in the shooting death of the identified male and Witness 1's wife was charged.

On November 12, 2019, Witness 1 met with the prosecutor and detectives assigned to the case. Witness 1 was represented by Schwantes at the meeting. During the meeting, Witness 1 provided a second statement to law enforcement regarding the events surrounding the shooting of the known man inside of his residence. Witness 1's statements were crucial in linking Witness 1's wife to the charged crimes.

The criminal case against Witness 1's wife would remain open and active from November 2, 2019, until Witness 1's wife was sentenced on July 28, 2021. During that time frame, Schwantes, who represented Witness 1 and would be counsel for Witness 1 should Witness 1's testimony be needed, engaged in sexual intercourse with Witness 1.

**EVIDENCE OF PLAN, PREPARATION AND MODUS OPERANDI REGARDING VICTIM 4,
SCHWANTES PREVIOUS REPRESENTATION OF VICTIM 4, AND ONGOING EFFORTS TO
PROVIDE LEGAL ASSISTANCE**

Among the videos and photos recovered from Schwantes phone were a video and image of a woman later identified as VICTIM 4. The video depicts VICTIM 4 in medical scrubs with a close-up of VICTIM 4's breasts. Schwantes's phone also included a screenshot of a financial transaction where Schwantes used PayPal to send VICTIM 4 \$1,382. This payment was made on 9/30/2019. This conduct is outside the statute of limitations but shows Schwantes Modus Operandi of soliciting those he has contact with

in the judicial system through his representation of them in matters involving him becoming aware of these victims traumatic experiences almost always through a human trafficking or sexual assault.

VICTIM 4 had a criminal case in Milwaukee County and was represented by Schwantes on the matter in 2017-2018. In 2022, VICTIM 4 filed a pardon application with the Governor's Office. In the application, VICTIM 4 expressed that her prior criminal convictions were the result of being the victim of human trafficking. The application includes specific citations to state and federal statutes criminalizing human trafficking.

In 2023, VICTIM 4 was referred in to the Milwaukee County District Attorney's Office for criminal charges. Those charges were not issued, but Schwantes's phone number was added to the referral as legal counsel for VICTIM 4.

On August 29, 2024, Milwaukee County Investigator Michael Lopez conducted an interview of VICTIM 4, who confirmed having sexual intercourse with Schwantes on a number of occasions in exchange for money, all of which occurred in Milwaukee County.

During the interview, VICTIM 4 confirmed seeking Schwantes assistance in locating the documents for filing for a pardon. VICTIM 4 also confirmed contacting Schwantes when VICTIM 4's son was facing a criminal investigation. According to VICTIM 4 the purpose of contacting Schwantes was to seek legal advice regarding VICTIM 4's son.⁴ VICTIM 4 stated that Schwantes was willing to help but wanted sexual favors in exchange for that help. VICTIM 4 described it by saying "I'll help you, but you've got to suck my dick."

FINANCIAL RECORDS FROM SCHWANTES'S PAYPAL, VENMO, AND CASH APP ACCOUNTS CONFIRMS THE REPORTS OF VICTIM 2, VICTIM 3, AND VICTIM 4

On August 14, 2024, Investigator Dean Newport reviewed the records provided by PayPal Venmo and CashApp in response to a search warrant, which demonstrate that:

Using Venmo, Schwantes paid Victim 2 \$250.00 on the following dates: May 29, 2023; June 5, 2023; August 27, 2023; and October 15, 2023. Schwantes also sent a second payment of \$50.00 on October 15, 2023. **For three of the payments, Schwantes put either Justice or Just us in the notes.**

Schwantes also used Venmo to pay VICTIM 3 on two separate occasions. On September 29, 2023, Schwantes paid VICTIM 3 \$400.00. On November 24, 2023, Schwantes sent VICTIM 3 a payment for \$360.00.

Additionally, Schwantes used CashApp to pay VICTIM 3 on five additional dates: On May 16, 2022, Schwantes sent VICTIM 3 \$50.00; On July 5, 2022, Schwantes sent VICTIM 3 \$300.00; On August 3, 2022, Schwantes sent VICTIM 3 \$50.00; On August 24, 2022, Schwantes sent VICTIM 3 \$300.00; and on November 4, 2022, Schwantes sent VICTIM 3 \$300.00

Using Paypal, Schwantes paid VICTIM 4 on two separate occasions. On the first occasion, September 30, 2019, Schwantes paid VICTIM 4 \$1,382.00. On the second occasion, November 4, 2019, Schwantes paid VICTIM 4 \$425.00.⁵

⁴ VICTIM 4's son was referred in to the Milwaukee County District Attorney's Office regarding a felony referral in July of 2024, when Schwantes was on leave from the Office of the State Public Defender.

⁵ The State has not issued any charges related to VICTIM 4 because the conduct falls outside of the Statute of Limitations. The investigation and conduct is being included to show the ongoing pattern of conduct on the part of Schwantes.

**SCHWANTES'S FINANCIAL RECORDS DEMONSTRATE A PATTERN OF PAYMENTS
CONSISTENT WITH LONGSTANDING PROSTITUTION WITH MULTIPLE ADDITIONAL WOMEN**

Within Schwantes's phone, there are multiple messages exchanged with multiple different women with whom Schwantes engaged in prostitution with. One of those persons is identified as Victim 5, a known person with significant previous law enforcement experience based in Milwaukee. The messages discussed the different costs for "incall" services versus outcall services. Complainant is aware through training and experience that this language used and costs for services are consistent with prostitution. Additionally, Victim 5's name appears on Schwantes's list of persons whom he had sex with.

**VICTIM 2 WAIVES ATTORNEY CLIENT PRIVILEGE ALLOWING INVESTIGATORS TO ACCESS
HER FILE INVOLVING REPRESENTATION BY SCHWANTES SHOWING MISCONDUCT IN OFFICE
AND OTHER CRIMES**

On September 12, 2024, Victim 2 waived attorney client privilege and her file that was at this time with the Office of the State Public Defender was released. Investigators reviewed the file and inside was a within the file, Schwantes filled out a standard form that complainant knows is used to determine whether a potential client is eligible for public defender representation. The date of this form on the signature page is August 3, 2023. The form is used to gather information and assess whether a person qualifies for Public Defender representation based on a person's income, financial obligations, and assets. The completion of an e-form by a lawyer within the office of the state public defender is a duty they can perform for potential clients to see if they would qualify for representation. Complainant knows that from time to time lawyers from the OSPD are asked to e-form clients by judges in court to see if they would qualify for representation. The form is signed by Schwantes, but not VICTIM 2, and within the form, Schwantes represented that Victim 2 was unemployed, having lost her job cleaning homes at a wage of approximately \$4,000 per month due to the current charges. This is false information. Victim 2 stated she did not tell Attorney Schwantes this. She did not have a job cleaning houses at the time she could have lost due to the charges issues in the case. In addition Attorney Schwantes knew this based on his continued solicitation of VICTIM 2, even if it were communicated to Schwantes he would then know it to be false personally given his personal knowledge of her income. As of August 3, 2023 Schwantes was employed at 819 North 6th Street, in the City of Milwaukee, Milwaukee County, Wisconsin in the public defender's office, a public employee position.

A review of Schwantes personal cell phone records show that on August 3, 2023 Victim 2 and Schwantes did have a phone call.

A review of the file showed it contained emails sent by Schwantes regarding his representation of Victim 2. In an email authored by Schwantes on August 3, 2023, Schwantes wrote to a clerk with Milwaukee County's Out of Custody Intake Court indicating that Victim 2 contacted the Office of the State Public Defender by phone seeking assistance in clearing the warrant on her open case. Schwantes asked the clerk to set up a court date for Victim 2 to clear the warrant on her open Milwaukee County case for August 8, 2023.

On August 3, 2023, Schwantes also wrote an email to the Waukesha Office of the State Public Defender, forwarding the e-form documentation that Schwantes authored and signed for VICTIM 2, asking the Waukesha Office of the State Public Defender to appoint Victim 2 counsel on her two open cases in warrant status in Waukesha County. In response to the email, employees with the Waukesha Office of the State Public Defender indicated that they would make every attempt to have counsel appointed by August 10, 2023.

Complainant learned later that by being the person who completed the e-form for Victim 2 he would be able to have the case assigned to himself in the public defenders office. This would allow him to

conceal his underlying ties to VICTIM 2. This would be needed because it is prohibited from representing her because of ethical rules governing lawyers. Regardless of whether at the time Victim 2 would have qualified for public defender representation because of income and assets and obligations she had Schwantes knowingly made a false entries in a record that were material because whatever entries were made those entries did in fact create an obligation of the OSPD to represent her, when had the form not been completed no obligation would have existed and the entries Schwantes made were false. In addition the entries were also materially false as they hid Victim 2 true source of income and hid Schwantes criminal activities that are associated with his solicitation of VICTIM 2. This discretionary act of completing the e-form there for obtained a dishonest advantage for both Schwantes and Victim 2 in that he lied about her income on the form and allowed him to represent her in a manner inconsistent with his duties as a lawyer for the Office of the State Public Defender. It is not that he was having a sexual relationship with his client while employed by the OSPD it is that he was engaging in solicitation of VICTIM 2.

Travis Schwantes made a number of material misrepresentations, all of which served to ensure that: (1) Victim 2 qualified for Public Defender representation; (2) that Schwantes, a supervising attorney in the office who predominantly handled felony cases, would represent Victim 2 on a misdemeanor case; (3) the e-form filled out by Schwantes would be used by the Public Defender's Office in Waukesha County to appoint counsel for VICTIM 2; (4) Victim 2 source of financial support, engaging in prostitution, would remain concealed; (5) Schwantes's criminal conduct with Victim 2 would continue to be concealed; and (6) Victim 2 would not go to jail and would continue to be available for Schwantes to engage with in future acts of prostitution.

Schwantes left detailed information off of the e-form to ensure that his material misrepresentations could not be investigated. Schwantes left Victim 2 social security number off of the form so that the representations about Victim 2 employment could not be examined or investigated by officials charged with verifying employment information within the Office of the State Public Defender. Schwantes also did not list any of the required information about the purported home cleaning company, such as the name of the company, the name of the person (boss) who employed VICTIM 2, or any contact information, such as an address or phone number to verify the employment.

In the context of engaging in multiple crimes with VICTIM 2, Schwantes used his profession, not just to ensure legal representation for Victim 2 with information Schwantes knew to be materially false, but to ensure he was the sole source of the information and that he provided the legal representation which served to guarantee nobody would discover the true source of Victim 2 income or Schwantes's underlying criminal conduct with VICTIM 2.

On August 7, 2023, Schwantes received an internal message from the Milwaukee Office of the State Public Defender indicating that all conflict checks were completed and Schwantes was formally appointed to represent Victim 2 on her Milwaukee County case.

On August 9, 2023, JP, an Assistant State Public Defender with the Waukesha Office, emailed Attorney Schwantes to inquire whether Victim 2 turned herself in on the Milwaukee case on August 8, 2023. Schwantes responded within 10 minutes:

"We planned on going in yesterday but I learned our sheriff's department now is taking people into custody on out of county warrants. There was a stretch of time where they did not do this.

I told [VICTIM 2] this and she made the decision to not come in yesterday or today, which makes it unlikely she will be in Waukesha tomorrow, unless somehow the warrant there could be vacated before tomorrow.

We can arrange a walk-in date in Milwaukee any day of the week and her Milwaukee warrant will be cleared and she will almost certainly get a signature bond.

Is there any way to get the Waukesha matter reset out a week or so and get the warrant cleared in advance of the hearing so she can go to clear the Milwaukee warrant without being taken in on any other warrant?"

In response to Schwantes's email, JP wrote, "There really isn't a way for me to get the warrant cleared without [VICTIM 2] coming to court..."

In response, Schwantes wrote: "Got it - thank you. I imagine she will have to think of a time when she can manage to be in custody for a few days or more to clear these warrants."

On October 8, 2023, Schwantes closed the client file for VICTIM 2. Within the client file, Schwantes noted that Victim 2 failed to appear for out-of-custody intake court as the reason for closing his file.

Additionally, a number of emails were recovered from Schwantes's cell phone that demonstrate that Schwantes provided legal services to Victim 2 in August of 2023, while Travis had an ongoing prostitution based relationship with Victim 2 which is corroborated by the electronic payments which show that using Venmo, Schwantes paid Victim 2 \$250.00 on the following dates: May 29, 2023; June 5, 2023; August 27, 2023; and October 15, 2023. Schwantes also sent a second payment of \$50.00 on October 15, 2023.

This would also mean that defendant Schwantes violated 977.06(2)(b) as the party to a crime of as he made false statements he knew to not be true for the purpose of qualifying Victim 2 for counsel. Victim 2 never told him she lost her job cleaning houses as a result of these charges.

FORMER SPD EMPLOYEE PROVIDES BACKGROUND INFORMATION ON FILE SYSTEM WITHIN THE MILWAUKEE OFFICE OF THE STATE PUBLIC DEFENDER

On September 26, 2024, Investigator Newport conducted an interview of JK, a former employee of the State Public Defender's Office. The former employee worked in the Milwaukee Office of the State Public Defender for over 24 years and was familiar with the internal file system.

While with the Office of the State Public Defender, the former employee managed the intake department and routinely reviewed contents of SPD files, as well as the official forms used to determine if a person qualified for representation by the Public Defender. According to the former employee, the Public Defender's Office uses a case management system called EOPD, which stands for Electronic Office – Public Defender. Each case within EOPD has information pertaining to the charged defendant, the victim, witnesses, dates of birth, addresses, phone numbers, the SPD case number, the criminal charges, and the assigned judge. The system can be used to look a person up and see all the cases that person is associated with historically.

Upon being shown Victim 2 file from SPD, the former employee recognized the file was for a misdemeanor offense. When the former employee reviewed the contents of the file, the former employee noted the following:

- 1) The Wisconsin State Public Defender Eligibility Form (e-form) is typically filled out by a secretary, especially when a person contacts the office via telephone;
- 2) It was highly suspect that a felony supervising attorney filled out the eligibility intake form, especially on a call to the SPD office that would be answered by a secretary;

- 3) When someone calls the Milwaukee Office of the State Public Defender, the phone is answered by a secretary;
- 4) The e-form filled out for Victim 2 is missing Victim 2 social security number – without that number there is no way for the Office of the State Public Defender Verification Unit (in Madison) to review the accuracy of the contents of the e-form to vet what was reported concerning Victim 2 employment;
- 5) The name and address section for Victim 2 last employer is devoid of any necessary information. That information is also necessary to verify the information listed;
- 6) The wage income section, gross income section, and unemployment compensation section were all blank;
- 7) The e-form is not signed by Victim 2 – which is a huge red flag. The e-form must be signed by the potential client indicating the person agrees with the contents, in case there is a challenge to the information at a later date;

The former employee noted that the case was closed on October 8, 2023, with Schwantes reporting that he worked 1.5 hours on the case. The reason given for the file being closed was that Victim 2 did not appear for out of custody intake court.

Of note, there were no records in Victim 2 SPD file from 2024, when Victim 2 case was resolved. The former employee noted that when a SPD client returns to court on a warrant the following year, a new file folder with a 2024 SPD case number would be created but is not part of the information provided. When Victim 2 signed the release for her case file, there was no records or file turned over relative to what transpired on Victim 2 case in 2024. Wisconsin Circuit Court Access (CCAP) records show that in Victim 2 2021 case, she was represented by defendant Green from July 2021 until February of 2022 when Victim 2 failed to appear to court. Schwantes was entered as attorney of record on August 8, 2023. On May 8, 2024 Schwantes was stopped and his cellphone was seized pursuant to a warrant. On May 13, 2024, Schwantes filed a notice of completion and withdrew from representation. On May 13, 2024 an attorney within the Public Defender's office represented Victim 2 and the case was resolved on that date when it had only been set for a scheduling conference but the file provided contains no information regarding this.

**VICTIM 2 CONFIRMS THAT SCHWANTES MATERIALLY MISREPRESENTED INFORMATION
ABOUT Victim 2 IN HIS CAPACITY AS AN ASSISTANT STATE PUBLIC DEFENDER**

On September 13, 2024, Investigator Newport conducted a follow-up interview of VICTIM 2, who provided the following information to Investigator Newport. Victim 2 never provided her name to Schwantes. During either the first or second prostitution based meeting with Schwantes, Schwantes identified Victim 2 by her name and informed Victim 2 that he was aware that she had multiple open criminal cases in warrant status. Schwantes informed Victim 2 that he was a Public Defender and could assist Victim 2 on her open cases. Victim 2 was surprised that Schwantes was able to identify her true name and knew about her open cases.

Schwantes informed Victim 2 that he could help her by having an attorney with the Public Defender's Office in Waukesha assist in having her warrants cleared in that jurisdiction while Schwantes worked to clear Victim 2 warrant in Milwaukee County. Victim 2 disclosed that she was making approximately \$10,000 to \$20,000 per month engaging in prostitution during this time frame, and Schwantes certainly knew about the source of Victim 2 income, as he repeatedly paid Victim 2 in exchange for penis to vagina sexual intercourse throughout 2023.⁶

⁶ State law mandates that persons who are seeking representation by the Office of the State Public Defender to meet certain financial guidelines. Under Wis. Stat. §§ 977.06 & 977.07 it is an official duty of the State Public Defender to make indigency determinations.

Investigator Newport asked Victim 2 about the information contained within her client file on the e-form filled out and signed by Schwantes. Victim 2 denied ever calling the State Public Defender's Office seeking assistance in clearing the warrants on her open cases, denied ever telling Schwantes that she was unemployed after being terminated from a job cleaning houses, denied ever representing to Schwantes that her employer terminated her after her employer found out about her open criminal cases, and denied representing to Schwantes that Victim 2 made over \$4,000 per month cleaning houses prior to being terminated. All of those details were fabricated by Schwantes on a government form to ensure that Victim 2 qualified for and received Public Defender representation, all of which took place while Schwantes continued to see and pay Victim 2 to have sexual intercourse with Schwantes on an ongoing basis.

According to VICTIM 2, Schwantes contacted a Public Defender in the Waukesha County Office to attempt to have the warrants withdrawn and a court date set up for Victim 2 in Waukesha County. Simultaneous to the efforts in Waukesha County, Schwantes sought to have a court date set up in out-of-custody intake court in Milwaukee County where Schwantes would represent Victim 2 and have her warrant withdrawn in Milwaukee County. The goal, according to Schwantes, was to have the warrants withdrawn in Waukesha County first so that by time Victim 2 appeared in Milwaukee County, she would avoid being taken into custody and transferred to the Waukesha County Jail to clear the Waukesha County warrants.

Schwantes later informed Victim 2 that the Waukesha County warrants could not be withdrawn without her appearance in Waukesha County and if she appeared on the court date he set up in Milwaukee County, Victim 2 would be taken into custody on the Waukesha County warrants and transported to the Waukesha County Jail to clear the warrants. Schwantes advised Victim 2 to not appear in Milwaukee County on the date he previously set up to clear the Milwaukee County warrant if Victim 2 did not want to be taken into custody and transported to Waukesha County. On Schwantes's legal advice, Victim 2 subsequently did not appear for out of custody intake court in August of 2023.

Subsequent to Schwantes legal assistance to Victim 2 in August of 2023, Schwantes continued to engage in multiple acts of exchanging money with Victim 2 in exchange for sexual intercourse, all while Victim 2 criminal cases remained in warrant status.

This does not exhaust the information gathered during this investigation which remains ongoing.

****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 Nicolas J Heitman and Ken Olstinski.

Subscribed and sworn to before me on 12/19/24

Electronically Signed By:

Nicolas J Heitman

Assistant District Attorney

State Bar #: 1070560

Electronically Signed By:

Investigator Dean Newport

Complainant