

You may have an attorney help or represent you.

If you do not provide a proper answer within forty-five (45) days, the court may grant judgment against you for the award of money or other legal action requested in the Complaint, and you may lose your right to object to anything that is or may be incorrect in the Complaint.

A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future, and may also be enforced by garnishment or seizure of property.

Dated this 2nd day of June, 2024.

SWANIGAN LEGAL SERVICES
Attorneys for Plaintiff

By: _____ Verona Swanigan _____
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FILED
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Anna Maria Hodges
Clerk of Circuit Court
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Honorable Glenn H
Yamahiro-34
Branch 34

MILWAUKEE COUNTY

CIRCUIT COURT

STATE OF WISCONSIN

ESTATE OF SADE ROBINSON,
SHEENA SCARBROUGH, as executor
and individually,

Plaintiff,

vs.

MAXWELL ANDERSON,
Defendant.

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Case No:

PETITION

NOW HERE COMES, Plaintiffs Estate of Sade Robinson, Sheena Robinson, executor and individually, hereinafter referred to as Plaintiffs, by and through their attorney Verona Swanigan, Esq. to hereby petition this court for their causes of action against the above-named Defendant, the Plaintiffs allege and show claims for relief and forthwith saith that:

Jurisdiction and Venue

1. This action arises under the laws of the State of Wisconsin.
2. The parties resided in the State of Wisconsin in Milwaukee County for more than six months.
3. The acts accounted in this case took place in and have substantial contacts with the State of Wisconsin in Milwaukee County.
4. Accordingly, Milwaukee County, State of Wisconsin has jurisdiction and venue over this matter.
5. Defendant Maxwell Anderson, hereinafter referred to as Anderson or Defendant, resided in Milwaukee County, Wisconsin at 3161 South 39th Street, Milwaukee, WI 53215, and is currently incarcerated in the Milwaukee County Jail under criminal case number 2024CF001692 State of Wisconsin vs. Maxwell S Anderson for 940.01(1)(a) 1st-Degree Intentional Homicide; 940.11(1) Mutilating a Corpse; and 943.03 Arson of Property Other Than Building.

GENERAL FACTS ALLEGED HERE AND IN FULL WITH EVERY CLAIM HEREIN

Discovery of a Severed Human Leg in Warnimont Park

1. On Tuesday, April 2nd, 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.
2. 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.
3. 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.
4. 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.
5. 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.
6. 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.
7. 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.
8. The video footage shows, at approximately 2:53 am, 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.

9. It is known based on information and belief that this service road to the pump house would be the furthest that a car could go to get near Lake Michigan in that area.
10. Detective Spittlemeister spoke to Cudahy Police Detective Brian Olson who informed Detective Spittlemeister that on the morning of April 2nd, 2024, employees of the Cudahy Water Department reported that the service gate had been struck by a vehicle.
11. The damage to the gate was done after the evening of April 1st, and before the morning of April 2nd, 2024—this is consistent with when the vehicle is seen on video driving onto that service road.
12. 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.
13. Detective Spittlemeister also recovered video from the pump house that faces north, in the direction of where the severed leg was recovered.
14. At approximately 3:02 am, 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.
15. At approximately 4:31 am, the vehicle that entered the closed gate leaves and ultimately leaves the park, heading westbound.
16. 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.
17. 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

18. At approximately 9pm on April 2nd, 2024, a walk-in report was made by AJ at the Milwaukee Police Department District 2 station.
19. AJ reported that her friend, Sade C Robinson, had not been returning AJ's calls and had not showed up for work.
20. AJ provided a phone number for Sade Robinson of 414-510-4769 and reported she lived at 1858 N. Commerce Street, Apartment 309 in Milwaukee.
21. On April 3rd, 2024, Milwaukee Police Officer Nora Burlo responded to Robinson's apartment to conduct a welfare check and was not able to contact Sade Robinson.
22. AJ further reported to investigators that the last known activity of Sade Robinson was a Snap Chat 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 1st, 2024. No further contact had been made with Sade Robinson after that.
23. Upon hearing of the discovery of the leg near Wanimont 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.
24. Sade Robinson was approximately 5 feet tall. Sade was an African American female. She was a student, who should have been graduating this year. Sade Robinson is displayed here:



25. Robinson's listed height with the Wisconsin Department of Transportation is 5'0".
26. Officer Burlo as well as Milwaukee County Sheriff's Office Detective Joseph Blanchar contacted employees of Robinson's apartment building (1858 N. Commerce Street).
27. The apartment's maintenance employee, EF, indicated that he had last seen Robinson on April 1st, 2024.
28. Another employee, building Secretary CAS, reported that she would frequently see and speak with Sade Robinson, and Sade Robinson told CAS she was excited for a date she had the evening of April 1st.

29. 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 1st, 2024.
30. Sade 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

31. Furthermore, on April 2nd, 2024, at approximately 7:32 am, members of the Milwaukee Fire Department responded to 1819 N. 29th Street (the area of W. Lisbon Ave. and N. 29th Street) for a vehicle fire.
32. First responders located a 2020 Honda Civic with Wisconsin registration ASP1171.
33. The vehicle had sustained extreme fire damage completely damaging the interior of the Civic.
34. A check of that vehicle registration revealed that vehicle belonged to Robinson.
35. Items of Robinson's were discovered in the vehicle, as will be described later in this complaint.
36. A 2020 Honda Civic is worth \$21,000 dollars. The vehicle was totally destroyed by Defendant.

Robinson's Phone Records

37. 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).
38. It should be noted that AJ as well as family members of Robinson confirmed that number belonged to her.
39. Detective Vandertie reports that records were received from Verizon that included call detail records, location records, as well as recent text message content.
40. 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.

41. The conversation occurred between approximately 4:15pm and 5:18pm on April 1st, 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 3 rd ?"
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 felling seafood"
4145104769	"Yes I love seafood"
2624164874	"Sounds good Im about to leave ill be there soon"
4145104769	"\00\0k\0 =M<\0"
2624164874	"Just got to twisted"
4145104769	"Ok are u inside?"
2624164874	"Yes"

42. Detective Vandertie searched law enforcement databases which showed an association between 262 416-5874 and Maxwell S Anderson, the above-named Defendant.
43. 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.
44. Investigators then checked Wisconsin Department of Transportation records which revealed the Defendant's listed address is 3161 South 39th Street in the City of Milwaukee.
45. 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.
46. Detective Guillot recovered surveillance video from Twisted Fisherman.

47. The video shows, in sum, as follows: at approximately 5:09pm on April 1st, 2024, the Defendant enters Twisted Fisherman from the west. His face is clearly visible on the exterior cameras of the restaurant.
48. At 5:20pm, Robinson enters the restaurant from the east, then approaches the bar and sits next to the Defendant.
49. The Defendant and Robinson remain at the bar eating and having drinks together until they leave the restaurant around 6:24pm.
50. They both leave towards the east, which is the direction Robinson arrived from.
51. Sade 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.
52. 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.
53. 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.
54. 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).
55. 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."
56. 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.

57. Milwaukee County Sheriff's Office Detective Brian Conte conducted an interview on April 3rd, 2024, with ASF, who identified herself as a friend of Sade Robinson.
58. ASF indicated to Detective Conte that she became aware Sade Robinson was missing by seeing it on the news. ASF stated that after she learned Sade Robinson was missing, she accessed Sade Robinson's Life360 app on her cell phone.
59. 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 Sade Robinson's phone appeared to be in Warnimont Park around 4:33am on April 2nd, 2024.
60. The Life360 accounts belonging to Robinson also is linked to her phone number mentioned above.
61. Based on Life360 Robinson's phone locations were 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 40th and W Oklahoma Ave (Duke's on Water to area of Anderson's residence, 3161 S. 39th St)
 5. 04/01/2024 & 04/02/2024 - 2128 to 0048 hours (3 hours, 19 minutes) near S 40th St & W Oklahoma Ave
 6. 04/02/2024 - 00048 to 0138 Hours: The device traveled from S 40th St and W Oklahoma Ave to 3335 N Gordon Pl (from the area of Anderson's residence, 3161 S 39th 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
62. On April 4th, 2024, investigators with the Milwaukee County Sheriff's Office executed a search warrant on the Defendant's residence at 3161 S. 39th Street in Milwaukee.
63. During the execution of that search warrant, identifiers for the Defendant were located, including packages addressed to the Defendant.
64. Additionally, blood was located on bedding in one of the bedrooms and on the walls leading towards the basement.
65. Several gasoline containers were in the garage/storage area. Furthermore, the Verizon records for Robinson's phone number, which included call detail records and location information of the phone, were analyzed by investigators.
66. The records, consistent with the Life360 information described above, show Robinson's device close to Twisted Fisherman when Robinson is with the Defendant at that location.
67. Additionally, the records show the device moves 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. 39th Street.
68. Milwaukee Police Detective Jake Pusching reviewed pole camera video footage near Duke's on Water. That footage shows Robinson's Honda Civic arriving at 6:33pm, and at 6:34pm, Robinson exits the driver's door, and the Defendant exits the front passenger's door.

69. The two of them then walk across the street and eventually walk in the direction of Duke's on Water.

70. Detective Pusching 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 2nd, 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; (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 1st, 2024)
3. By approximately 1:33am, the phone travels north towards the area of Pleasant Valley Park, near N. Humboldt Boulevard and E. Keefe Avenue (just south of Capitol Drive) where it remains until approximately 2 am;
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 4:30 am;
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 around E. Howard Avenue and WI 794, consistent with the location where Life360 indicates the battery of the phone died.

Discovery of Human Remains Near 31st & Galena Street

71. On Friday, April 5th, 2024, members of the Milwaukee Police Department began to canvass the area near where Robinson's Honda Civic was set on fire.
72. While searching the area of the 31st & 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.
73. Investigators located, in addition to the foot, another piece of what appeared to be human flesh in the same area.
74. Detective JoAnn Donner 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.
75. The location of where these remains were discovered was approximately one block south of where Robinson's car was set on fire.
76. 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).

77. The video footage depicts the following: the bus stops on the corner of 29th and Lisbon Avenue at 7:29am, facing westbound (in the direction of where Robinson's car was set on fire).
78. 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.
79. The bus begins to drive forward towards 30th 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 30th and Lisbon.
80. 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.
81. As the bus continues to drive westbound on Lisbon Avenue, the burning of Robinson's vehicle is clearly visible.
82. As the bus continues to pass, the subject with the tan backpack can be seen starting to cross Lisbon Avenue, southbound.
83. Milwaukee Police Detective Ryan Casey 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.
84. Upon reaching the vacant lot next to the liquor store, both subjects appear to slow down, at which time the subject with the tan backpack begins to walk across Lisbon, southbound on 30th Street.
85. 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.

86. 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.
87. The subject in the blue jacket also begins yelling for someone to call the fire department.
88. Investigators were eventually able to identify the subject in the blue jacket as LAD.
89. 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.
90. LAD 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 30th Street.
91. 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.
92. Through that video canvass, detectives learned the subject with the tan backpack walked westbound towards N. 35th Street, and then eventually got onto a Milwaukee County Transit System Bus at 8:12am to head southbound on N. 35th Street, which is the direction towards the Defendant's residence.
93. The video from that MCTS bus captured the face of that subject as he boarded and remained on the bus, and through that footage, Detective JoAnn Donner reviewed the Defendant's booking photo related to his arrest on April 4th, 2024 (described below).
94. Detective JoAnn Donner was 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.
95. 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:



96. 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 35th Street and gets off the bus at approximately 8:35am near S. 35th Street and W. Lakefield Drive on Milwaukee's south side.
97. 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.
98. 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.
99. Surveillance video affixed to a residence across the street from the Defendant's residence (3161 S. 39th Street) was recovered by Milwaukee Police Detective Rachel Smith.
100. This video footage depicts S. 39th Street and the front of the Defendant's residence, as well as part of the south side of his residence.

101. There is a front gate on the south side of the Defendant's residence, and over that gate the rear gate near the alley is also visible.
102. 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.
103. The Defendant's dark hooded top and tan backpack that appears full are visible in this video.
104. 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 1st, 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.
105. Also recovered was a remnant of an iPhone, consistent with the type of iPhone Robinson was known to have.
106. 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 1st, 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.
107. At approximately 11:25pm on April 1st, 2024, there is human movement in the back yard again. This movement continues on and off, until approximately 12:45am on April 2nd, 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.

108. As described above, Robinson's phone does not appear to depart from Anderson's residence between the arrival around 9:24pm on April 1st until around 12:50am on April 2nd.
109. Detective Smith also recovered surveillance video from 3174 S. 40th 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).
110. Detective Smith reviewed that video which shows Robinson's vehicle leaving the alley southbound at 12:47am on April 2nd, 2024.
111. Detective Smith also recovered video footage from a camera that depicts the intersection of S. 35th 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 35th Street at approximately 12:53am on April 2nd, 2024. This movement is consistent with the location of Robinson's phone, as described above.
112. On April 4, 2024, at around 1:16pm, 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.
113. 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.
114. 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.
115. 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.

116. Detective JoAnn Donner further stated 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 1st, 2024.

117. No one has had contact with Sade Robinson since she was with the Defendant on the night of April 1st, into April 2nd, 2024.

118. Sheena Scarbrough, the mother of Sade Robinson last saw her on Easter day March 31, 2024, and spoke to her on April 1, 2024. Mrs. Scarbrough has not heard from or seen her daughter since.

119. Based on the circumstances surrounding the disappearance of Robinson, as described herein, and the recovery of the human leg that was preliminarily identified as Robinson's, Detective JoAnn Donner concluded Robinson is deceased and Defendant Anderson without permission violently and aggressively touched and sawed Mrs. Robinson's body, dismembered her, then spread her corpse in various locations to evade arrest, and committed arson by burning the vehicle of Mrs. Robinson with the intent to conceal evidence.

120. Further, based on the type of information needed, the skill, and the tools necessary to commit such a heinous act in such a short amount of time, it is believed that these actions were planned premeditated and without just cause.

121. The facts mentioned in herein corroborate 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.

122. Sheena Scarbrough is the mother of Sade Robinson.

123. Sheena Scarbrough last heard her daughter's voice on April 1, 2024, before Sade Robinson went to work at Pizza Shuttle. Sade Robinson sent her mother a text on Monday afternoon to see how she was doing and asked her mother to CashApp her \$15 at 3:48 pm. They

then said for the last time I love you to each other on April Fools, after spending Easter Sunday the day before together laughing and enjoying each other's company with family and eating their Last Supper.

124. April Fool's Day was a festive day for a young woman who enjoyed life and spending time with friends. Sade Robinson was excited and looking for love when she left work that day to go on a date. Sade was a, 19-year-old, young woman who hoped that with the breeze of April a romantic tale would come into her life, but this turned quickly into a devil's nightmare. Sade did not expect to be Tricked on April Fools by a heinous murderer whose only desire was anything but love.

125. On, Wednesday, April 3, 2024, Mrs. Scarbrough was informed that her daughter was missing around 1:00 pm, when Mrs. Scarbrough got off work as a contracted tutor for MPS at Golda Meir. Her mother Linda Faye Scarbrough called her and asked her to come to her house. They noticed that the Life360 app was still in the same location at the park and had not moved in hours. Sade Robinson worked at Pizza Shuttle, but it was noted that the App had not moved when Sade should have gone to work.

126. Mrs. Scarbrough decided to go home first before going to her mother's house to search for her daughter, and when she arrived the MPD Police Officer was there to inform her that her daughter did not come to work and that a coworker from Pizza Shuttle reported Sade missing with the police on Tuesday. They asked Mrs. Scarbrough if she knew where Sade had been and what Sade had been doing over the last few days. The Officer asked Sade's minor sister about Sade's social media, and they then had Sade's sister to open Sade's social media including Snap Chat. The Officer told Mrs. Scarbrough right before he left that Sade's vehicle was found burned and that arson had happened to it on April 2nd. The Officer told Mrs. Scarbrough that her daughter's body was not in the vehicle, but that Sade Robinson was listed as a missing person.

127. Sade Robinson was missing all day Tuesday, but no one had contacted Mrs. Scarbrough to inform her that Sade was missing from her job or the police department.

128. On the same date April 3, 2024, Mrs. Scarbrough learned of the discovery of the leg of a five-foot-tall African American female being located at the beach when Jonathan Reams asked the Officer about the leg that was found on the beach. Mrs. Scarbrough had not seen the news yet, so she opened it up on her phone to read the article about the leg being located on the beach. Mrs. Scarbrough then asked if that was related to her daughter. They then realized that the location for where the leg was found was close to where the Life360 location stated her daughter's phone was last identified by the app.

129. The officer asked her to do a DNA test that day. He stated he was not sure whether the leg was her daughter's but that it was a possibility.

130. Sheena Scarbrough was next told that her foot and some bodily remains were found. Sgt April Johnson and Detective Briscoe informed them when Sade's body parts were located. Over a course of days, she learned of three different body parts being located of her daughter Sade. Then over a month later, a leg was located in Illinois, which caused an immense heart-breaking pain as she now believed her precious child's remains could be scattered around states and lost forever as time continues to go on. Sheena Scarbrough knew she would never see her daughter's beautiful face again.

131. Community members have been searching for Sade Robinson's remains, and the community members have informed Mrs. Scarbrough of the location of remains and then they contacted the police department. Mrs. Scarbrough has been tortured with constant calls that may be the next identification of a body part.

132. On April 12, 2024, at the first court appearance is when Sheena Scarbrough heard about the blood located in the house on walls, on a comforter, and other parts of the house. She heard the majority of the information on the news as she could barely stand to hear it as she sat in court. Mrs. Scarbrough could not comprehend what she was hearing had happened to her child as she sat in shock.

133. Mrs. Scarbrough's life has never been the same since that moment. Since that date, she has had the agonizing tortious experience of every few days being told that a body part of her beloved daughter has resurfaced in some location unfamiliar to her or her daughter. Her daughter's body was tossed to the street with no regard for decency or her grief and pain.

134. The information has been provided to the media including Facebook before anyone has formally come to her to provide the information and show her the photos in a humane and civilized manner and with the sensitivity, sympathy and empathy that should be offered to a family in this outrageous situation.

135. Anderson has stolen away their child's body, soul, future achievements, enjoyment of life, and beauty while simultaneously destroying her mother, father, and sisters right to enjoy her presence, engage in her support, rejoice in her graduation and future achievements, and even properly grieve her death and bury her body.

136. Mrs. Scarbrough has not been able to sleep, work, or even get motivated to do anything but wait for more remains of her daughter to be located. This process of waiting for the revelation of her daughter has been more than any person should ever have to bear, and has created depression, anxiety, insomnia, and PTSD that no parent should ever have to endure. Her sister has lost her confidant, role model, and best friend; and is suffering immensely due to this grave and incomprehensible violence perpetrated by the Defendant.

137. Sade Robinson's sister is named Adrianna Reams, and she is 16 years old. She missed a week of school, but then decided to continue to attend to distract her from the pain and challenges of being under the heinous nature of this offense. She has not been able work at the Wisconsin Country Club, where she worked with her sister and who lovingly would take her to work. She has been devastated from this loss.

138. Anderson owned the property located at 3161 South 39th Street, Milwaukee, WI 53215, where it is believed, based on the information above, Ms. Robinson was violently murdered.

139. Anderson's family immediately went to the property and threw away items located in the residence. Then they proceeded with selling the property at 3161 South 39th Street, Milwaukee, WI 53215 to conceal and hide evidence.

140. After the sale, it is believed based on the facts and witnesses thereto that a finger belonging to Ms. Robinson was located at the property.

141. Plaintiffs are requesting that all proceeds from the sale of the property be given to the Estate of Sade Robinson.

142. Plaintiff is further requesting that all assets, accounts, inheritance rights, donations, past, future, or present earnings, or any other tangible and intangible property be seized, frozen or a lien placed thereon for the protection of their rights. Defendant should not be permitted under law and equity to enjoy or gain any property based on the actions described herein or from the notoriety earned from slaying Ms. Robinson and destroying her family.

143. The Defendant had a history of violence that included a conviction in case number 2019CM002852 State of Wisconsin vs. Maxwell S Anderson, where he was ordered to pay \$7414.92 in restitution to Vincent S. for injuries sustained when Defendant committed battery/disorderly conduct.

144. The defendant Maxwell Steven Anderson was found guilty of the following charge(s) in Door County Case Number 2015CF000062 State of Wisconsin vs. Maxwell Steven Anderson: Disorderly Conduct [Modifiers: Domestic Abuse], a class B misdemeanor, Wisconsin Statutes 947.01(1); Criminal Damage to Property, a class A misdemeanor, Wisconsin Statutes 943.01(1); and Intimidate Witness, a class A misdemeanor, Wisconsin Statutes 940.42.

145. In Waukesha County Case Number 2014CM001216 State of Wisconsin vs. Maxwell S Anderson, the defendant Maxwell S Anderson was found guilty of Disorderly Conduct, a class B misdemeanor, Wisconsin Statutes 947.01(1).

146. In Milwaukee County Case Number 2022CT000069 State of Wisconsin vs. Maxwell S Anderson, the defendant was charged with both Operating a Motor Vehicle While Under the

Influence-2ND Offense and Operating with Prohibited Alcohol Concentration-2nd Offense.

Maxwell S Anderson was found guilty of Operating a Motor Vehicle While Under the Influence-2ND Offense, an unclassified misdemeanor, Wisconsin Statutes 346.63(1)(a).

FIRST CAUSE OF ACTION WRONGFUL DEATH

1. Every allegation in the proceeding paragraphs is replead herein as if plead herein originally.
2. Pursuant to Wis. Stat. § 895.04, Plaintiffs have the proper standing and right to sue herein as the deceased was not married and did not have any living children. Sade Robinson was a 19-year-old student at the time of her demise.
3. Wrongful death actions are derivative tort actions. *Ruppa v. Am. States Ins. Co.*, 91 Wis. 2d 628, 646, 284 N.W.2d 318 (1979). Sade Robinson but for her death could have sued the Defendant for battery, destruction of property, great bodily harm, intentional infliction of emotional distress, and therefore her parents and estate have the right to sue for the same claims.
4. There are necessarily two elements in the cause of action for wrongful death. There is the wrongful or tortious conduct which renders the tort-feasor potentially liable and the death of the party which establishes the right of action. *Bradley v. Knutson*, 62 Wis. 2d 432, 439, 215 N.W.2d 369, 372 (1974).
5. Defendant feloniously and intentionally killed Sade Robinson without just cause in violation of the wrongful death statutes. As stated above, he cut her body into pieces with a saw and caused her death. He acted intentionally, with malice while taking planned actions in hopes to get away with murder. He had a propensity towards extreme violence. He knew or should have known that his actions would cause the death of Sade Robinson, and that as a direct result of his actions Sade Robinson would suffer immense pain and that her mother and sister would suffer in an indescribable way for the remainder of their lives at the loss of Sade Robinson and the visual site of seeing her bodies remains located over time in decaying decomposed pieces.

6. Pursuant to Wisconsin's wrongful death statute, plaintiffs' requests in part judgment for damages for pecuniary injury from wrongful death may be awarded to any person entitled to bring a wrongful death action. Additional damages not to exceed \$500,000 per occurrence in the case of a deceased minor, or \$350,000 per occurrence in the case of a deceased adult, for loss of society and companionship may be awarded to the spouse, children or parents of the deceased, or to the siblings of the deceased, if the siblings were minors at the time of the death. Wis. Stat. § 895.04(4). Although general damages for loss of society and companionship are recoverable under § 895.04(4), general damages are not recoverable pursuant to the language of Wis. Stat. § 973.20(5)(a). *State v. Muth*, 2020 WI 65, ¶81 n.5, 392 Wis. 2d 578, 623, 945 N.W.2d 645, 668.
7. Plaintiff is seeking punitive damages, reasonable reliance damages, damages for emotional distress, and compensatory damages. Plaintiff is seeking Attorney's fees and costs, and any statutory or other relief that in equity or law.
8. Plaintiffs seek all funds and proceeds from the sale of the property located at 3161 South 39th Street, Milwaukee, WI 53215.
9. It is possible that the court will determine that the Defendant does not now and shall not likely in the future have sufficient assets to compensate for this claim; "under these circumstances, this court must follow the axiomatic principle that when: "it [is] impossible for [a] court, if it should decide the case in favor of the plaintiff, to grant him any effectual relief whatever, the court will not proceed to a formal judgment." *Nills v. Green*, 159 U.S. 651, 653, 16 S.Ct. 132, 133, 40 L.Ed. 293 (1895). See also, *Adams v. Resolution Trust Corp.*, 927 F.2d 348, 354-55 (8th Cir. 1991); *Triland Holdings & Co. v. Sun Belt Service Corp.*, 884 F.2d 205, 208 (5th Cir. 1989); *Resolution Trust Corp. v. Greenwood*, 798 F.Supp. 1391, 1399 (D. Minn. 1992)." See *Weinberger v. Robert K. Steuer*, No. 94-C-928, 1998 U.S. Dist. LEXIS 25040, at *26 (E.D. Wis. Feb. 12, 1998).
10. Accordingly, Plaintiffs request the rights to any present and future interests including to any and all rights and financial gain from the use of defendant's image, creative control, movie, television,

streaming, books, published manuscripts, interviews, speaking engagements, and the similar assets in perpetuity.

11. Mrs. Scarbrough as the personal representative and mother also seeks to recover the reasonable cost of investigatory expenses, expenses for locating her daughter's body, memorial expenses such as t-shirts and programs, funeral expenses, including the reasonable cost of a cemetery lot and care of the lot, grave marker or other burial monument, coffin, cremation urn, urn vault, outer burial container, or other article intended for the burial of the dead. Wis. Stat. Ann. § 895.04 (LexisNexis, Lexis Advance through Act 118 of the 2023-2024 Legislative Session).
12. Mrs. Scarbrough seeks damages for her personal and her minor daughter's Adrianna Reams emotional distress, loss wages, and medical expenses.
13. Plaintiffs are requesting punitive damages for the malicious and violent premeditated knowing acts of Defendant. Defendant willfully dismembered and threw the body of Sade Robinson around the city of Milwaukee. These actions harmed the community at large, placed fear into the community, caused trauma to those who found the remains, and shocked the consciences and soul of plaintiffs to extreme degree that is immeasurable. A plaintiff may receive punitive damages if evidence is submitted showing that the defendant acted maliciously toward the plaintiff or in an intentional disregard of the rights of the plaintiff. Wis. Stat. § 895.043(3) (2013-14). A person acts in an intentional disregard of the rights of the plaintiff if the person acts with a purpose to disregard the plaintiff's rights, or is aware that his or her acts are substantially certain to result in the plaintiff's rights being disregarded. This will require that an act or course of conduct be deliberate. Additionally, the act or conduct must actually disregard the rights of the plaintiff, whether it be a right to safety, health or life, a property right, or some other right. Finally, the act or conduct must be sufficiently aggravated to warrant punishment by punitive damages. See *Milwaukee City Hous. Auth. v. Barki*, 2017 WI App 1, 372 Wis. 2d 833, 890 N.W.2d 48. The allegations as stated above show the elements necessary for punitive damages as the defendant with an intentional disregard for human life and for the community. He disregarded Sade Robinson's basic and most essential

right to life, and it was aggravated by the dismemberment and attempt to destroy all evidence by torching her vehicle.

SECOND CAUSE OF ACTION VIOLATION OF THE WISCONSIN CONSTITUTION

14. Every allegation in the proceeding paragraphs is replead herein as if plead herein originally.

15. Defendant violated Section 1. Equality; inherent rights. [As amended Nov. 1982 and April 1986]

All people are born equally free and independent and have certain inherent rights; among these are life, liberty and the pursuit of happiness; to secure these rights, governments are instituted, deriving their just powers from the consent of the governed. Wis. Const. Art. I, § 1.

16. Defendant took the life, liberty and destroyed Sade Robinson's ability, opportunity, and even chance at happiness.

17. Further, the Defendants act of taking the life and dismembering the body of Sade Robinson violated the pursuit of happiness and life enjoyment of her mother Sheena Scarbrough and has eliminated her quality of life and right to consort with her daughter.

18. Defendant had a duty to comply with the Constitution, and to not behave in a savage and violent manner causing pain and injury of life to Plaintiffs.

19. Plaintiff is seeking all possible recovery for lost wages and consequential damages. Plaintiff is seeking Attorney's fees and costs, and any statutory or other relief that may be available in equity or law.

THIRD CAUSE OF ACTION BATTERY

20. Every allegation in the proceeding paragraphs is replead herein as if plead herein originally.

21. The Defendant without permission touched, battered, abused, sawed and violently murdered Sade Robinson. Defendant did these actions intentionally and knowingly without cause.

22. Defendant caused significant damages and ended the life of Sade Robinson.

23. The Estate of Sade Robinson demands all damages including but not limited to compensatory, incidental, and consequential damages including but not limited to pain and suffering, loss future income, burial and memorial expenses, and all other related expenses.
24. The Plaintiffs are requesting all the damages listed above plus the business interests of the defendant in any and all businesses and any heir interest.
25. Plaintiffs are requesting payment for grief counseling and mental health counseling to specifically assist them in coping with the loss of Sade Robinson's remains and her remains being tossed about the city with no regard for human decency.

FOURTH CAUSE OF ACTION INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

26. Every allegation in the proceeding paragraphs is replead herein as if plead herein originally.
27. A claim for intentional infliction of emotional distress requires a showing of four elements: (1) the defendant intended to cause emotional distress by his or her conduct; (2) that the conduct was extreme and outrageous; (3) that the conduct was a cause-in-fact of the plaintiff's emotional distress; and (4) that the plaintiff suffered an extreme disabling response to the defendant's conduct. Milwaukee City Hous. Auth. v. Barki, 2017 WI App 1, 372 Wis. 2d 833, 890 N.W.2d 48.
28. The Defendant intentionally caused emotional distress when he murdered violently and cut into pieces the body of Sade Robinson. The act of murder and dismemberment with a saw, and then throwing the body parts in every corner of Milwaukee County is extreme and outrageous.
29. Plaintiffs have experienced an obscene amount of emotional distress as they were first afraid, Sade was burned to death, and then told that Sade Robinson was dismembered with a saw and spread in pieces around the city with no idea as where all of her remains could be located.
30. Defendant has not identified or shown where the remains are located causing an on-going torturous pain for Plaintiffs. Defendant is aware that his refusal to inform police of what happened and where the remains were intentionally dumped would cause pain and an increase in costs to the family and the city.

31. Plaintiff Sade Robinson is now deceased with no ability to be properly buried, and her mother Mrs. Scarbrough and her minor sister are left in an emotional uproar with no idea when the pain would ever cease as they cannot sleep, are experiencing nightmares, are crying insatiably, are having headaches, cannot eat, and cannot find a sense of comfort or peace as they sit in agony and pain.
32. Defendant has intentionally caused Plaintiffs emotional distress.
33. Plaintiffs are entitled to all damages in equity and law in an amount to exceed \$75,000, and punitive damages as stated above, attorney's fees, costs, and statutory interest.

A JURY TRIAL IS REQUESTED.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs, by and through attorney, Verona Swanigan, Esq., respectfully request recovery for all damages previously pled herein, and for compensatory damages for the reasons previously pled, punitive damages for the intentional malicious and egregious offense of dismemberment and refusal to inform the police or plaintiffs where Sade Robinson's remains are located and in an amount to be determined and/or allowed by common law or by statute, in an amount left to the sound discretion of the jury, but in an amount necessary to satisfy the jurisdictional limits of this Court or any other Court, unless said damages are set, in whole or in part, by statute, for punitive damages, for their attorney fees and all costs herein expended, and for all other relief to which Plaintiffs are justifiably entitled in equity and law.

Dated the 2nd, day of June, 2024.

Respectfully submitted,

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