

FILED
09-07-2023
CIRCUIT COURT
DANE COUNTY, WI
2023CF002345

IN CUSTODY IA 09/07/2023 @ 1:30PM
Assign to Branch

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

STATE OF WISCONSIN

Plaintiff,

vs.

BRANDON A THOMPSON

UNK

UNK, WI

DOB: 11/11/1996

Sex/Race: M/B

Eye Color: Brown

Hair Color: Black

Height: 6 ft 0 in

Weight: 200 lbs

Alias:

Defendant,

Ref. Agency: Madison (City) Police
Department

DA Case No.: 2023DA008863

Agency Case No.: 2023-00383450

Court Case No.: 23CF ____

ATN:

CRIMINAL COMPLAINT

For Official Use

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

Count 1: FIRST DEGREE SEXUAL ASSAULT

The above-named defendant on or about Sunday, September 3, 2023, in the City of Madison, Dane County, Wisconsin, did have sexual intercourse, penis to vagina, with Jane Doe, without that person's consent and caused great bodily harm to that person, contrary to sec. 940.225(1)(a), 939.50(3)(b) Wis. Stats., a Class B Felony, and upon conviction may be sentenced to a term of imprisonment not to exceed sixty (60) years.

Count 2: FIRST DEGREE RECKLESS INJURY

The above-named defendant on or about Sunday, September 3, 2023, in the City of Madison, Dane County, Wisconsin, did recklessly cause great bodily harm to Jane Doe, under circumstances which show utter disregard for human life, contrary to sec. 940.23(1)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

Count 3: STRANGULATION AND SUFFOCATION

The above-named defendant on or about Sunday, September 3, 2023, in the City of Madison, Dane County, Wisconsin, did intentionally impede the normal breathing by applying pressure on the throat or neck of another person, contrary to sec. 940.235(1), 939.50(3)(h) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

FACTS:

Your Complainant is a Court Officer for the City of Madison Police Department and has reviewed reports prepared by City of Madison Police Detective Kenneth Brown and Detective Lieutenant Matthew Nordquist, all of whom your Complainant believes to be truthful and reliable because they are sworn law enforcement officers.

Detective Brown reports on 09/03/2023, at 3:18AM, numerous Officers were dispatched to the 500 block of West Wilson Street, in the **City of Madison, County of Dane, State of Wisconsin**, reference a female who was naked and appeared to be severely beaten. Madison Police Sergeant (Sgt.) Sherrick was first on scene and indicated the female, an individual who was identified and for this complaint will be referred to as Jane Doe, has injuries and stated it was "one of the most horrifying things I've seen." Sgt. Sherrick stated that Jane Doe was covered in blood, her face was purple, bruised and swollen. Sgt. Sherrick attempted to obtain information from Jane Doe, but Jane Doe was unable to communicate.

Jane Doe was eventually transported to UW Hospital with what was initially described as life threatening injuries. Later in the morning on 9/3/23, Madison Police Detective Meredith responded to UW Hospital Emergency Room and learned that Jane Doe's injuries consisted of missing teeth, both eyes were swollen shut, and her body was covered in blood. It should be noted a tooth was located between two residences in the 500 block of West Wilson St. Detective Meredith also learned Jane Doe had a broken jaw and needed eight stitches to repair her upper lip. Detective Meredith remained on scene while an FNE Nurse, who was identified and for this complaint will be referred to as AL, completed an FNE of Jane Doe. Nurse AL informed Detective Meredith that Jane Doe suffered injuries consistent with penetrating vaginal trauma causing several injuries including tearing, and lacerations to Jane Doe's genital area. Nurse AL further advised that Jane Doe was sexually assaulted. Nurse AL also believed Jane Doe was strangled during the attack based on her examination and findings.

Detective Brown reports on 9/7/23, he contacted an individual, who was identified and for this complaint will be referred to as Witness 1. Witness 1 stated that Jane Doe is still severely injured as a result of the attack. As of 9/7/23, Jane Doe had been diagnosed with a grade two Traumatic Brain Injury, and an MRI showed a small brain bleed. Jane Doe had multiple facial fractures, a broken nose, and her lip needed stitches in four places. Jane Doe lost one tooth during the attack. Witness 1 stated Jane Doe's eyes are swollen shut, and her face is covered in bruises, and is black, blue, pink and purple. Witness 1 stated there are visible injuries and bruising to Jane Doe's neck. Witness 1 stated there are marks, and abrasions on Jane Doe's knees and elbows and arms. Jane Doe is currently on a feeding tube and unable to provide a statement as she shows extreme signs of confusion when awake. It should be noted that immediately after the assault Jane Doe was in a medically induced coma and still has trouble staying awake.

Detective Brown reports it was noted in initial police reports that the residents in the 500 block of W. Wilson St had called 911 after being alerted by a male name "Brandon" that there was a female in need of help. Madison Police Officer Reimer identified the occupants of the 500 block of W. Wilson Street. He contacted an individual, who was identified and for this

complaint will be referred to as Witness 2. Witness 2 stated that she woke up to use the bathroom and upon walking through the kitchen, she heard a male voice yell to her that a female needed help. It should be noted the kitchen window was open due to the heat. The male verbally identified himself to the occupants, as "Brandon." Brandon was later positively identified via an ID Card and via DOT records as **BRANDON A THOMPSON**, the defendant herein and referred to as Thompson herein, told Witness 2 and others he had located a female in the street, naked and bloody, and carried her behind a residence in the 500 block of W. Wilson St. Witness 2 stated Thompson was light skinned wearing black sweatshirt and gray sweatpants.

Madison Police Detective Amoroso conducted an interview on 9/3/23, with an individual who was identified and for this complaint will be referred to as Witness 4, who stated she needed to use the bathroom and realized that Witness 2 was inside the bathroom and knocked on the bathroom door, at which time she heard a male voice yell, "hey." Witness 2 stated she was startled by this and did not know where it was coming from until she realized there was a male, Thompson, outside of her kitchen window reporting a naked female laying on the ground. Witness 2 stated that Thompson claimed he was out for a "high walk" when he came upon Jane Doe and seemed concerned for her wellbeing. Witness 2 stated that she obtained a flashlight and shined it in the direction of Thompson and realized that Jane Doe was covered in blood. It was at this time that they decided to call the police and Thompson appeared to become "antsy" and claimed he did not want to be around police when he was high, and he eventually left the scene.

On 9/6/23, Madison Police Detective Amoroso contacted an individual who was identified and for this complaint will be referred to as Witness 3. Witness 3 stated that he, Witness 2, and Witness 4, were speaking with Thompson when he observed dried blood on Thompson's hands. Witness 3 stated Thompson had told them that he located Jane Doe injured and bleeding in the street, so he picked her up and carried her behind a residence on the 500 block of W. Wilson St. Detective Brown reports from reviewing crime scene photographs, none of Jane Doe's blood was in the street, however it was located behind a residence in the 500 block of W. Wilson Street, in the City of Madison, Dane County, Wisconsin, and on an AC unit and the ground. There were also blood droplets on the grass in between two residences on the 500 block of W. Wilson Street.

Detective Brown reports on 9/3/23, he and Detective Amoroso contacted an individual who was identified and for this complaint will be referred to as Witness 5. Witness 5 stated that Jane Doe arrived at her apartment at 7:56 PM, on 9/2/23, and left between 2:16AM and 2:18AM on 9/3/23. Witness 5 stated she sent Jane Doe a text at 2:43AM, asking if she made it home safe and Witness 5 stated Jane Doe never read, or responded to the text. Witness 5 stated Jane Doe is not a person who partied, or a drug user.

Detective Brown reports he contacted Nurse AL. In reviewing the FNE report, he observed AL wrote on the report, "highly suspicious for strangulation." In reviewing the description of injuries, he observed that AL documented the following injuries to Jane Doe's neck: on the front right side of her neck there was a bright red irregular bruise to anterior-right aspect of neck, measuring 1.2 cm x 0.9 cm. Also noted was a series of bright red petechiae to the left of the neck measuring 5.2 cm x 2.3 cm. Also noted were pink linear abrasions, the longest of which measures 1.6 cm. He asked AL about her suspicion of strangulation and AL stated one of the first signs to her was chin bruising and swelling, which is a sign of strangulation. AL

stated the parallel linear marks could indicate the suspects hands but, also Jane Doe's hands trying to pull the suspects hands off her neck. AL stated the pattern and location of these injuries is consistent with strangulation. Regarding the vaginal injuries AL stated, "the Intra vaginal laceration is one of the worst I've seen." AL stated the injury was still actively bleeding and bruising, during the exam and indicated forceful penetration.

Detective Brown reports with the times provided by Witness 5, he was able to review city camera's and located Jane Doe on Park Street and the West Washington Avenue camera crossing Park St, and then W. Washington Ave at 2:25AM on 9/3/23. Coincidentally, he located a Chevy sedan arriving and parking at the Brittingham Park parking lot at 2:26AM, which shows a male exit the vehicle wearing a black sweatshirt and gray pants. The male heads in the direction of W. Washington Ave at about the same time Jane Doe was in the area.

Detective Brown reports while reviewing camera footage of the Proudfit and West Washington Avenue camera, his attention was on the W. Washington corridor where he located Jane Doe walking inbound on W. Washington Avenue at 2:32AM. He observes Jane Doe walking alone and it does not appear anyone is following her. The camera captures Jane Doe until 2:35AM when the camera switches direction. Jane Doe at that time is very close to the CVS located at S. Bedford and W. Washington Ave. Detective Brown reports on 9/6/23, Detective Meredith informed him that the vehicle, a Chevy, that had parked at Brittingham parking lot leaves the lot at 3:00AM and travels inbound W. Washington Avenue. The vehicle is tracked on the W. Washington and Proudfit camera and is seen turning right onto S. Bedford St at 3:02AM.

Detective Brown reports he reviewed surveillance footage from a private camera. He and Detective Amoroso obtained footage from a resident in the 500 block of West Main Street, which captures Jane Doe walking on the west side of the street near The Depot apartments. A male matching the description of the male at Brittingham Park is walking on the east side of the street at 2:39AM, looking in the direction of Jane Doe. Detective Brown reports he reviewed footage from a building in the 100 block of South Bedford Street, which shows Jane Doe walking past the front door camera at 2:37:30AM, and a subject following her from behind at 2:37:40. The footage is not of good quality, and he is unable to tell if it is the same male located on 500 block of W. Main St footage.

Detective Brown reports based on information from Witness 5 that Jane Doe had been or is being attacked at 2:43AM as she does not respond to Witness 5's text message. He reviewed clips from a camera on a building in the 500 block of West Wilson Street, a few houses away from where Jane Doe was located. The four clips were from cameras affixed to the front porch area. He focused his attention to 3:00AM, as he knows the Chevy from Brittingham Park turns onto S. Bedford at 3:02AM. At 3:01AM, he observes a Chevy pull into the driveway and turn around.

Detective Brown reports he was able to get the video enhanced and he can observe the plate to the Chevy that turns around in the driveway. The plate is WI PC 730UKS, which is registered to Brandon A. Thompson, DOB: 11/11/96, the defendant. In reviewing Thompson's DOT photo and descriptors, he matches what the residents in the 500 block of W. Wilson Street describe to Officer Relmer and Detective Amoroso.

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Detective Brown reports on 9/3/23, at 1:18AM, Thompson is pulled over by the Fitchburg Police Department while operating the Chevy bearing WI PC 730UKS. In reviewing Fitchburg Police Officers body camera footage, Thompson is wearing the same clothing during the traffic stop and when he exits his vehicle at Brittingham Park.

Detective Brown reports the defendant, Thompson, is later located and arrested at Meriter Hospital and during an interview with Detective Meredith and Detective Grann he makes incriminating statements.

Detective Lt. Nordquist reports while being interviewed by Detectives Meredith and Grann, Thompson admits that he was mad and "wanted to hit something." Thompson admitted to encountering a woman and "saw red" and "didn't know what was going on." Thompson stated the next thing he remembered was the female on the ground in front of him. During the interview Thompson stated, "She came across a monster." When Detectives asked Thompson if he sexually assaulted Jane Doe, Thompson stated, "I don't remember sexually assaulting her." Then he also stated, "I went into a rage, when I came to, she was on the ground." Thompson stated, "The only thing I remember is just hitting." When questioned further about the sexual assault Thompson said something like, "I don't remember it during the actual assault, I just kind of zoned out during the rage." Detective Meredith and Grann asked Thompson if he could have sexually assaulted Jane Doe and he stated, "I could have."

Detective Brown reports on 09/05/23 he spoke with Wisconsin State Crime Lab DNA Analyst Kevin Scott, regarding the analysis he conducted on the Forensic Nurse Examination kit of Jane Doe. Scott stated through his analysis he located semen on all 6 swabs taken from below the waist of Jane Doe. They included vaginal swabs and swabs from her inner thighs. Scott stated that he was able to identify one "foreign male contributor" as the source of the DNA from the semen recovered from those swabs. On the morning of 09/06/23, Analyst Scott was provided the Forensic Nurse Examination kit for Brandon Thompson. Scott stated he was able to obtain a DNA profile of Thompson from the FNE kit provided. Analyst Scott then conducted an analysis comparing Thompson's DNA to the DNA located on the swabs recovered from Jane Doe's Forensic Nurse Examination. Specifically, Scott stated he was able to identify a single source male profile from swabs taken from the inner thigh and external labia majora fraction 2 of Jane Doe. Analyst Scott stated that the single source of male DNA obtained from each of those swabs is consistent with the profile of Brandon Thompson, the defendant, with a probability of one in one quadrillion. Analyst Scott stated one in one quadrillion is the highest probability that the Wisconsin State Crime Lab will identify.

Your complainant is aware that the above offenses occurred in the City of Madison, Dane County, Wisconsin.

****THIS COMPLAINT IS BASED ON** the information and belief of your complainant, who is a Court Officer for the Madison Police Department, and who learned of the above offense(s) from the report(s) of Police Detective Brown and Detective Lt. Nordquist, which report(s) your complainant believes to be truthful and reliable inasmuch as it was prepared during the course of the officer(s) official duties.

Further, your complainant believes the information furnished by the witness(es) to be truthful and reliable inasmuch as they are citizen informant(s) and witnessed the events described.

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

Subscribed and sworn to before me on
09/07/23

Electronically Signed By:

Andrea B. Raymond

Deputy District Attorney

State Bar #: 1068164

Electronically Signed By:

DET LINDA TREVARTHEN

Complainant