

FILED
08-06-2024
Anna Maria Hodges
Clerk of Circuit Court
2024CF003735
Honorable David
Swanson-11
Branch 11

STATE OF WISCONSIN CIRCUIT COURT MILWAUKEE COUNTY

STATE OF WISCONSIN
Plaintiff,

DA Case No.: 2024ML017022
Court Case No.:

vs.

CRIMINAL COMPLAINT

ERICKSON, TODD ALAN
1811 NORTH HUMBOLDT AVENUE
MILWAUKEE, WI 53202
DOB: 07/16/1964

JOHNSON-CARSON, DEVIN W
1330 MISSOURI AVENUE
SOUTH MILWAUKEE, WI 53217-2
DOB: 02/02/2001

TURNER, BRANDON LADANIEL
1212 NORTH 27TH STREET
MILWAUKEE, WI 53208
DOB: 07/05/1989

WILLIAMSON, HERBERT T
2730 NORTH 49TH STREET
MILWAUKEE, WI 53210
DOB: 09/10/1971

Defendant(s).

For Official Use

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

COUNT ONE: FELONY MURDER (As to defendants Todd Alan Erickson and Devin W Johnson-Carson and Brandon LaDaniel Turner and Herbert T Williamson)

The above-named defendants on or about Sunday, June 30, 2024, at 333 West Kilbourn Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, did cause the death of DM, while committing misdemeanor battery, as a party to a crime, contrary to Wisconsin State Statute Section 940.19(1), contrary to sec. 940.03, 939.05 Wis. Stats.

Upon conviction for this offense, a Felony, the defendants may be imprisoned for not more than 15 years and 9 months.

Probable Cause:

Complainant is a City of Milwaukee Police Officer and bases this complaint upon the statement of fellow City of Milwaukee Police Officers, as well as their reports, and Complainant's own involvement in this investigation. Those reports, statements, and that investigation revealed the following:

First Responding Officers and Scene Investigation

Detective Martin Saavedra stated that on June 30, 2024, at about 4:30 PM, he and other members of the Milwaukee Police Department's Criminal Investigations Bureau – Homicide Division responded to the Hyatt Hotel, located at 333 W. Kilbourn Avenue, City and County of Milwaukee, to investigate the death of victim DM. Saavedra stated that uniformed patrol officers and emergency medical personnel had arrived on scene prior to detectives and located DM unresponsive **and not breathing** on the ground in the driveway, just outside the northbound entrance to the Hyatt. Police and Fire Department personnel attempted life saving measures, which were ultimately not successful.

Detective Saavedra stated that on scene, he and other detectives encountered various witnesses and determined that the four above-named defendants, Todd Erickson, Brandon Turner, Herbert Williamson, and Devin Johnson-Carson were involved in detaining DM during his death. Detective Saavedra stated that the investigation yielded that Todd Erickson and Brandon Turner were employed by the hotel as "Security Guards," Herbert Williamson was employed as a "Bell Driver Door Attendant," and Devin Johnson-Carson was employed as a "Front Desk Agent." Saavedra stated that Erickson, Williamson and Johnson-Carson were working at the time of the incident, and Turner was not working, but happened to be at the hotel when DM first arrived on scene.

During a scene investigation, Detective Saavedra and other responding officers and Medical Examiner personnel recovered several items of evidence. First, Detective Saavedra recovered a metal pipe, consistent with inhaling cocaine base, in the victim's left shoe. He later recovered a second similar pipe, made of glass, that was found secreted in the victim's anus by the Medical Examiner's Office. He also recovered copper chore boy in the victim's shorts pocket. The victim was not found to have a wallet or cash.

Security Video From The Hyatt

Saavedra stated that shortly thereafter, Milwaukee Police Detective Rachel Smith recovered surveillance video that captured much of the incident leading up to DM's death on camera. Saavedra stated that the video shows the following:

DM is first captured on video running through the hotel lobby, appearing to have entered the hotel from the N. Martin Luther King Jr. Drive entrance. DM runs across the lobby, in what appears to be a frantic manner, and into the lobby gift shop. DM is off camera for a brief moment, but shortly thereafter runs out of the gift shop and down the hall toward the women's bathroom.

Security camera footage shows DM enter the women's bathroom and close the door. Approximately 5 seconds later, a woman, later identified as witness LWC, exits the bathroom in what appears to be a hurry. As LWC exits the bathroom, Brandon Turner enters the bathroom and pulls DM out of the bathroom. Brandon Turner grabs DM by the shirt and begins to escort DM back down the hallway toward the Kilbourn Ave. entrance of the hotel lobby. At times while being escorted down the hall, DM has his hands raised up.

The security video then shows Brandon Turner escort DM into the main lobby. Once in the main lobby, DM can be seen making a motion towards Brandon Turner and a struggle occurs between the two. DM can be seen holding on to Brandon Turner's waistband, as Brandon Turner backs away and punches DM, eventually knocking DM to the floor.

The video then shows a civilian hotel guest, later determined to be SB, attempt to assist Turner. Turner and SB then escort DM towards the front doors of the hotel, appearing to corral DM as he moves. At one point, it appears that DM tries to get past Turner and SB. The two of them then grab DM and drag DM through the sliding doors that lead from the hotel lobby to the driveway on the north side of the hotel on Kilbourn Ave.

Just as Turner SB pull DM out through the doors, another hotel employee, TB, uses a broom to strike DM twice in the legs. At this point, DM reacts to the broom strikes and SB falls to the ground. Turner then begins to strike DM with closed fists approximately six times, some of which occur while DM is on his knees. DM is then able to get to his feet and moves as if he is attempting to re-enter the hotel.

SB and Turner then grab DM again and push him back outside. Soon thereafter, Turner, Johnson-Carson, and Williamson surround DM and grab ahold of him to prevent him from re-entering the hotel. Moments later, Erickson arrives on scene and the four defendants tackle DM to the ground in the driveway. **While taking DM to the ground, Turner strikes DM three times with a closed fist. Johnson-Carson strikes DM once with a closed fist. Erickson appears to attempt to strike DM with a fist, but ultimately kicks DM in the torso instead.**

Complainant notes that throughout the video, DM's behavior is erratic and confusing, and he engages in continuous physical resistance against the men described above. But DM does not instigate any violence or display any obviously aggressive or threatening behavior while on the hotel premises.

The video then shows that DM is now on the ground, laying on his left side, holding his right arm up to shield any blows from the defendants as described above. Erickson and Turner appear to attempt to flip DM onto his stomach, so that DM is lying face down, but DM resists their efforts. Williamson and Johnson-Carter then assist Erickson and Turner in forcing DM to his stomach, and holding him down. After the defendants get DM facedown, Turner holds DM's left arm and left torso, Erickson holds DM's head and shoulders, and Williamson holds DM's right arm and right torso. Each of these three men put varying amounts of force on DM's back, shoulders and arms during the period of time that they hold him down. At some points they do not appear to be applying much force and appear to simply be restraining DM, while at others they are using force to keep **DM face first on the ground**. Johnson-Carson is near DM's feet and holds his legs. The defendants hold DM in that position for **approximately 8 to 9 minutes** until police and emergency responders arrive on scene. During that 8 to 9 minute period, DM tries to break free from the defendants' restraint multiple times. Towards the end of that time period, DM has stopped showing movement or resistance or other signs of life.

When DM would struggle to get free, **the defendants would use various means of force to hold him in place**; including pushing down on DM's back, shoulders, and arms, and at one

point Erickson appears to strike DM with a collapsable baton. Complainant notes that the surveillance video does show that while the four Defendants are holding DM down, Turner makes a phone call later determined to be to 911.

Facebook Video

Complaint is also based upon the video obtained from Facebook. That video begins after the four Defendants have forced DM face first onto the ground, and are applying pressure to keep him there.

Unlike the hotel security video, the Facebook video has audio. As the video begins, DM can be heard making loud noises, as though breathing heavily. The four defendants are holding DM in the manner described in the hotel security video.

As the video camera approaches the area of the scene, DM can be heard yelling several things loudly, including “Please!” DM’s tone and sounds are consistent with an individual out of breath. Defendant Erickson can be heard yelling back, “Stay Down” “Stop Fighting,” and “Stay Down.”

As DM continues to moan loudly during heavy breaths, and while saying loudly, “I’m sorry,” Erickson looks at the video camera and says, “this is what happens when you go into the ladies room.” While other members of the hotel staff approach the person taking the video and argue with her about taking the video, **DM can be heard breathing and moaning loudly.** The female staff person states that DM threatened to shoot them.

Statements of Citizen Witnesses

Complaint is further based upon the statement of LWC, one of the women inside the bathroom. LWC stated that she was using the women’s bathroom, when DM, whom she described as large, entered the women’s bathroom and attempted to close the bathroom door. LWC stated that she told DM to let her out, at which point DM said, “no” and stood in front of the bathroom door. LWC stated that she pushed past DM and was able to get outside the bathroom. LWC also stated that later she saw DM fighting with hotel staff that were attempting to get DM away from the bathroom. The fight moved to the front door area, where she saw 3 to 4 staff members fighting with DM, and then hold DM on the ground for about 15 minutes. LWC stated that she thought that DM was on drugs because of the way he was acting and the number of staff it took to get him down.

Complaint is also based upon the statement of SM, another woman inside the bathroom. SM stated that while she was in the bathroom, DM, whom she thought was a “big” man, “frantically” walked into the bathroom like he was running away from someone. SM stated that DM appeared to be trying to lock the bathroom door. SM saw LWC rush past DM. SM then stated that she saw a young security officer come and tell DM that he had to leave the bathroom. She was unsure if the young security officer had to grab DM or not.

Complaint is further based upon the statement of SB, the citizen that assisted Turner during the initial portions of the encounter. SB stated that he was at the hotel and was waiting for his food to be delivered to the lobby when he saw DM run into the lobby gift store and hide behind

some snacks. SB stated that DM appeared to be paranoid, which caused SB to believe that DM was affected by drugs. SB further stated that staff in the store told DM to leave, at which point SB saw DM run from the store and go to the women's bathroom. SB stated that he heard screaming coming from the women's bathroom.

SB stated that he saw a skinny security guard, later determined to be Turner, go to the bathroom and attempt to get DM out of the bathroom. SB stated that DM was resisting and refusing to leave. SB stated that DM was much larger than Turner, and SB thought that DM might overpower the guard. SB saw DM reach into the guard's pockets, and then saw the guard punch DM.

SB decided to help and assisted the guard by grabbing onto DM and dragging him outside. SB did see a female staff member hit DM with a broom twice. SB stated that DM was on the ground and was yelling incoherently and was continuously grabbing onto the hotel doors. SB stated that three other staff members then came outside and wrestled DM back down to the ground, after DM had gotten up.

SB stated that the four staff members were able to get DM down to the ground and placed him face first down onto the concrete. SB stated that DM continued to fight and attempted to get up, and was yelling things. SB stated that he himself attempted to calm DM down several times.

SB stated that he never saw anyone strangle the victim or put anything on DM's neck area. SB did not believe that excessive force was used during this incident.

Autopsy

Complaint is further based upon the statement of Dr. Lauren Decker, an Assistant Medical Examiner with the Milwaukee County Medical Examiner's Office, who is trained and experienced in the field of forensic pathology. Dr. Decker performed the autopsy on DM and made several determinations about DM's death.

First, Dr. Decker determined that DM suffered from morbid obesity with a body mass index of 40 kg/m². He also suffered from heart disease.

Next, Dr. Decker determined that DM was suffering from the toxic effects of cocaine and methamphetamine consumption. Dr. Decker noted that the toxicology tests showed that DM had 390 mg/L of cocaine and 300 mg/L of methamphetamine in his system.

Dr. Decker further noted that DM suffered several blunt force injuries including abrasions and lacerations of the head, abrasions of the buttocks and extremities possibly consistent with being dragged over the floor and concrete, as well as other scattered contusions. Dr. Decker further noted that DM had suffered fractures of the ribs, but noted that those fractures are consistent with resuscitation efforts made during lifesaving measures and not the incident at issue.

Lastly, Dr. Decker noted that DM became unresponsive while being held in a face first prone position "by security while acting erratically." Dr. Decker was able to watch the surveillance

video obtained by the Milwaukee Police Department and determined that DM suffered “restraint asphyxia” as a result of four adult males restraining DM by the extremities, back and head.

Dr. Decker opines that due to the presence of cocaine and methamphetamines, as well as the victim’s body mass index, that DM may have suffered “restraint asphyxia” even if no force were applied to restrain while DM had been kept in the face first position for the period of time shown in the video. Dr. Decker notes that when a person cannot breathe in such a position, they would roll over onto their side. However, in this case, the video shows that DM had been on his side and had been forcibly moved onto his stomach by the four defendants. The video also shows that the four defendants used force to restrain DM and keep him in that position, even though at times the force applied to his back and shoulders seemed minimal.

Thus, because the victim was unwillingly placed in that position by the Defendants and held in that position by the Defendants, and suffered “restraint asphyxia” or “positional asphyxia” as a result, Dr. Decker has ruled that the cause of death was “restraint asphyxia” and that the manner of death was homicide.

Statement of the Defendants

Statement of Todd Erickson

Complaint is further based upon the statement of Todd Erickson, the on duty security manager on the day of the incident. Erickson spoke with Milwaukee Police Detective Martin Saavedra. Erickson stated that he has been working at Hyatt as a security officer since April of 2018. He further stated that Hyatt provides them with no safety equipment. Erickson stated that the collapsible baton he carries is his own but that he assumed his immediate supervisors are aware of his baton and consent to him carrying it. Erickson further stated he and other security personnel at Hyatt are NOT certified or licensed, but that Hyatt did provide them with a CPR training.

Erickson further stated that Hyatt did not provide them with training in Defense and Arrest Tactics (DAAT) training. However, Erickson stated that he has personally received DAAT training from Potawatomi when he was an employee there and he also stated that he has received “verbal judo” training in the past. Lastly, Erickson stated that he is aware of certain escort techniques, pressure points, and that he has been trained to apply the baton in order to move hands behind one’s back. Hyatt does not allow the security staff to carry firearms.

Erickson stated that his duties are to monitor surveillance cameras and patrol the premises. He noted that there is only one guard per shift.

On the above date, at the above place, Erickson was working as a security supervisor when he was alerted that Brandon Turner, a guard at the Hotel who was off duty, was fighting with a man in the lobby. Erickson stated that could see the fight on the security camera. Erickson stated that he exits the security office and goes to lobby to help.

By the time Erickson gets to the lobby, Erickson sees that Turner, Herbert Williamson (bellman), and Devon Johnson-Carson (front desk agent) are “tussling” with DM. Erickson

stated that he tries to help them get DM to the ground. Erickson stated that he can't remember whether he delivers any blows to DM. However, at one point he remembers using his baton to remove DM's hands from underneath him, to put DM's hands behind his back.

Erickson stated DM was very strong and kept resisting them. While he did not mention to Detectives that DM ever struck Erickson or threatened staff, he did state that at some point, DM attempted to bite him.

Once they get DM down to the ground, Erickson stated that he holds DM down by the shoulders. He also stated that DM kept struggling with them, so he held him down. Erickson stated that he was by DM's head, Turner is on the victim's left side, Williamson is on the right side, and Johnson-Carson is at DM's feet.

Erickson stated that he did not do anything to intentionally harm or kill DM.

Statement of Herbert Williamson

Complaint is further based upon the statement of Herbert Williamson to Detective Rachel Smith. Williamson stated that he is employed as a bellman for a month and a half.

On the above date, at the above place, Williamson stated that he was helping a guest with their luggage when he saw a fight involving staff. Williamson stated that he did not see what started the incident, but was told by a female manager that DM, who was fighting with staff, had locked himself in the bathroom with two females.

Williamson stated that he saw DM attempting to get back into the hotel and was being very forceful with the security guards. Williamson stated that he saw DM charging at security guards and saw the security guards get DM outside. He stated that DM was still very aggressive.

Williamson stated that the staff got DM down to the ground. He stated that DM was very strong. Williamson stated that they kept trying to get DM to calm down but that DM wouldn't calm down. Williamson stated that he put his right knee on DM's right arm, and Williamson put his left knee on the middle of DM's back. He stated that DM kept struggling and asking what did he do wrong. He also stated that DM started to try to bite the security guard Erickson. He did see Erickson strike DM three times with a baton.

Williamson stated that the staff were telling DM to calm down, but he wouldn't listen. After a while, Williamson stated that he got off DM, and Williamson stated that he thought DM was still responsive. However, "the next thing you know, I realized he was unconscious."

Statement of Defendant Brandon Turner

Complaint is further based upon the statement of Brandon Turner to City of Milwaukee Police Detective Justin Sokolowski. Turner stated that he works in various capacities and does different jobs for Hyatt.

On the above date, at the above place, Turner was off duty and stopped by the hotel to visit staff while on his way to George Webbs to get something to eat. While going to visit, Turner stated that he observed DM begging and harassing a guest of the hotel. Turner stated that he told DM not to go into the hotel, at which point DM ran from the 3rd Street entrance towards the front of the hotel.

Turner stated that he went inside the hotel and saw DM begging for money. Turner stated that as he approached, DM took off towards the store in the lobby. Turner stated that when DM saw Turner approaching, DM ran towards the woman's restroom. Turner stated that he approached the bathroom and that there were two women inside the bathroom and they were screaming. Turner stated that DM was attempting to lock himself in the bathroom.

Turner stated that he was able to grab DM by the shirt and was walking DM out of the hotel when DM "swung" on Turner and struck Turner in the jaw. Turner stated that DM was calling them names and was attempting to go into Turner's pockets. Turner admitted to punching DM several times and DM fell to the ground.

Turner stated that other people started to help and that they were able to drag DM out of the building. Turner stated that he believed that once they got DM outside, they rolled him over onto his stomach. Turner stated that DM began to fight so other staff, including Erickson helped put and keep him on the ground.

Turner stated that while they had him on the ground, Turner believed that DM was on drugs because he was hot to touch, DM was nodding off, and his eyes were rolling. Turner stated that DM was moving and resisting until the police got there. Turner stated that at one point he moved DM's clothing which was over DM's head. Turner pulled it off DM's face.

Statements of Defendant Devin Johnson-Carson

Complaint is further based upon the statement of Defendant Devin Johnson-Carson to Milwaukee Police Detective Cassandra Lindert on the day of the homicide. Johnson-Carson indicated that he has worked at the front desk at the Hyatt Hotel for approximately two months.

He stated that on the above date, at the above place, he had just ended his shift and was waiting for a ride when he heard a male voice yelling from inside the hotel. He then heard the doors being forcibly pushed off their racks. Johnson-Carson got up to see what is going on and saw guard Brandon Turner fighting with DM, whom Johnson-Carson described as a very large male. Johnson-Carson stated that Turner was trying to push DM outside and that DM was yelling and "frantically" trying to get back into the hotel.

Johnson-Carson stated that DM kept asking why he had to leave and heard Turner respond that DM knew what he did. Johnson-Carson also stated that the interaction made it appear to Johnson-Carson that DM was not in a "stable sort of mind." He said DM's responses were "gibberish" and didn't make sense. He also said that DM appeared to be pleading with staff to not be forced to leave, and was saying "please, what did I do? I got money!"

Johnson-Carson said he was aware that there were elderly people and children present, and that the staff on duty consisted of mostly women. He also was aware that Turner was physically smaller than DM, so Johnson-Carson made the decision to intervene and help.

Johnson-Carson stated that he saw DM trip and fall to the ground and also saw a guest assist Turner in trying to drag DM out of the lobby. Johnson-Carson saw DM get back onto his feet and Johnson-Carson was worried that Turner would not be able to control him.

Johnson Carson stated that he grabbed onto DM, but that DM was trying to get back into the hotel. Johnson-Carson stated that he switched his weight, swept the legs of DM and was able to take DM down to the ground. Johnson-Carson stated that he did throw a punch at DM, but stated that he thought he shouldn't punch the victim, so pulled back and doesn't believe he connected with DM.

Once DM was down to the ground, Johnson-Carson stated that Todd Erickson and Herbert Williamson came to assist. Johnson-Carson stated that when they took DM down to the ground, DM was on his side. Johnson-Carson stated that while DM was on his side, DM was trying to fight out of it, but also stated that DM was not to the point where he was uncontrollable.

However, Johnson-Carson stated that Erickson, the security supervisor, made the decision that DM needed to be on his stomach and told everyone to turn DM onto his stomach. Johnson-Carson thought this must be because the security guards had handcuffs. **Johnson-Carson stated that the four of them began wrestling with DM to get him onto his stomach and were able to do so.** Johnson Carson stated that he saw Erickson use a baton in an attempt to get control of DM's hands.

Johnson-Carson stated that he was holding onto DM's feet and could hear DM groaning and saying "stop" and "why." **Johnson-Carson also remembers DM stating something about breathing, but he could remember exactly what DM said.** Johnson-Carson stated that he could see that DM was breathing and also noted that Erickson checked DM's pulse a few times.

Johnson-Carson also stated that when the police arrived, he realized that DM was dead and he was overwhelmed. He stated that he never saw anyone strangle DM and that neither he nor the other four staff members ever state that they believed that DM was not breathing during the time he was face first on the ground.

Johnson-Carson did state that DM fought with them a few times to get up from the ground, but he and the other three staff, Turner, Erickson, and Williamson, had DM pinned on the ground.

Complaint is further based upon the sworn statement of Johnson Carson in an affidavit to Attorney William Sulton, an attorney for the family of DM, on July 8th. In that affidavit, Johnson-Carson stated that after assisting in the restraint of DM by getting him on the ground, "DM, upon being on the ground, no longer posed a danger of any kind, was not resistive, and appeared to be in distress." Johnson-Carson also stated under oath that he told Williamson "to stop applying pressure on [DM], at which point he finally withdrew his pressure and stoop up."

Johnson-Carson swore in the affidavit that Erickson ordered Johnson-Carson to grab DM's legs and that "[d]espite recognizing the hold, understanding that the force was not necessary and excessive, I was commanded by the on duty security manager (Erickson) to re-engage the hold on his legs and apply pressure." Johnson-Carson stated that he reluctantly did so.

Johnson-Carson also stated under oath that he heard DM "urgently say something about breathing. I heard [Erickson] say something to effect, 'I don't want to hear that shit.'"

He also swore under oath that DM "displayed clear signs of extreme distress, including gags, distressed breathing, and repeated pleas for help." He also stated in the sworn affidavit that he "witnessed [DM] take his final breaths and understood that the cause of his death was due to the extreme, unnecessary, and flagrant force administered to him, despite his clear indications of distress and lack of resistance."

Legal Note

Pursuant to Wisconsin Statute Section 940.19(1), Battery is defined as "caus[ing] bodily harm to another by an act done with intent to cause bodily harm to that person or another without the consent of the person so harmed."

"Bodily Harm" is defined in Wisconsin Statute Section 939.22(4) as "physical pain or injury, illness, **or any impairment of physical condition.**" "Impairment of the physical condition" is not defined by Wisconsin Statute. However, in *State v. Higgs*, 230 Wis.2d 1, 12-13 (Ct. App. 1999) the Wisconsin Court of Appeals found that to "impair" means to "**to damage or make worse by or as if by diminishing in some material respect.**" Thus, the Court of Appeals found that to impair physical condition, the act must damage or make worse the victim's physical condition in some material respect.

In this case, the combined actions of the four Defendants damaged or made worse DM's physical condition, namely his ability to breathe. The Facebook video shows loud breathing and gasps while DM is saying he is sorry. Johnson-Carson stated to police and in his affidavit that DM mentioned something about breathing, thus showing that DM's ability to breathe was at issue to the Defendants. This is also shown by Turner's moving of the article of clothing off of DM's face. Additionally, Johnson-Carson's affidavit states that DM was gasping and clearly in distress. Thus, by holding DM against his will, face first on the ground in a manner that prevented him from breathing due to his weight and consumption of drugs, the Defendants impaired DM's physical condition. All of these factors, the gasping, the actions and words of DM, the distress that he was in, show that all four Defendants were aware that holding DM face first on the ground was "practically certain" to cause "impairment of his physical condition."

****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 Daniel T. Flaherty and Grant Huebner.
ADA Assigned Email Address:

Subscribed and sworn to before me on
08/06/24

Electronically Signed By:

Grant I. Huebner

Assistant District Attorney

State Bar #: 1036890

Electronically Signed By:

Detective Martin Saavedra

Complainant