Case 2024CF004599	Document 2	Filed 09-27-2024	Page 1 of 2	FILED 09-27-2024 Anna Maria Hodges
STATE OF WISCONSIN	CIRCUIT CO	URT MILWAUKEE C	OUNTY	Clerk of Circuit Court 2024CF004599
STATE OF WISCONSIN Plaint		Case No.: 2024ML0243 urt Case No.:	94	Honorable Michelle A. Havas-10 Branch 10
vs. KAMOLOV, DIMITRI A 3000 EAST CRAWFORD AVE ST. FRANCIS, WI 53235 DOB: 04/12/1966	ENUE	CRIMINAL COMPLA	INT	
Defend	ant(s).			For Official Use

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

### Count 1: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)

The above-named defendant on or about Wednesday, September 4, 2024, at 4225 South Lake Drive, in the City of Saint Francis, Milwaukee County, Wisconsin, did knowingly install a surveillance device in a private place, or used a surveillance device to observe in a private place, with the intent to observe any nude or partially nude person without the consent of the person observed, and the victim of the violation had not, at the time of the violation, attained the age of 18 years, contrary to sec. 942.08(2)(a) and (4), 939.50(3)(i) Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

## Count 2: ATTEMPT CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant on or about Wednesday, September 4, 2024, at 4225 South Lake Drive, in the City of Saint Francis, Milwaukee County, Wisconsin, attempted to knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: JV1, depicted in the intimate representation was under 18 years of age, and under circumstances where the person so depicted had a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1 and (2)(dr), 939.50(3)(h), 939.32 Wis. Stats.

Upon conviction for this offense, an attempt to commit a Class H Felony, the defendant may be fined not more than Five Thousand Dollars (\$5,000), or imprisoned not more than three (3) years, or both.

### **Probable Cause:**

I am a Special Agent with the Wisconsin Department of Justice, Division of Criminal Investigations and base this complaint upon my investigation and review of WI DOJ/DCI reports. Said report state as follows:

On the above date, at the above location (St. Francis high school), the defendant, the school resource officer for the high school, asked JV1<sup>1</sup> (DOB 3/7/07) to come into his private office as he had a surprise

<sup>&</sup>lt;sup>1</sup> JV1 stands for juvenile victim 1 and will be used throughout the complaint. Based upon information and belief, including the defendant's interrogation, he is aware of JV1's identity.

for JV1. The defendant told JV1 that he brought JV1 a t-shirt back from Brazil. The defendant told JV1 to try the t-shirt on to see which one of the two fit, as there were two different sizes. The defendant then drew the blinds and exited the office. JV1 took off her outer most layer a zip up hoodie to try on the tshirts. This left JV1 wearing a tank top before she tried the shirt on. As JV1 was trying on the shirt, JV1 noticed a cellular phone propped up and recording JV1.

JV1went directly to the principals office and told the principal what JV1 observed.

Special Agent Marlock learned that the defendant is currently employed as a part-time, certified law enforcement officer with the St Francis Police Department, assigned as a School Resource Officer at the St Francis High School. Following the incident, the defendant was placed on administrative leave at which time his St Francis Police Department issued firearm and badge were collected. The defendant also provided the St Francis Police Department supervisors with his personal iPhone that he used to record the child.

A review of his cell phone revealed a video showing the defendant setting up the cell phone to record, setting the shirts out specifically in view of the cell phone. The video confirmed what JV1 told Special Agent Marlock that the defendant told JV1 about the shirts and told JV1 to try them on. JV1 takes off her outermost layer, tries them on, and sees the cell phone recording.

The review of his cell phone revealed the defendant emailed or texted himself the video of JV1 four separate times and one time he edited it to crop the video and slowed it down.

Since this incident, the Wisconsin Department of Justice, Division of Criminal Investigations walked through the entire school with a specially trained dog looking for additional hidden cameras and did not find any in the school.

\*\*\*\*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 <a href="http://efiling.wicourts.gov/">http://efiling.wicourts.gov/</a> and may withdraw as an electronic party 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 Erin M. Karshen.

Subscribed and sworn to before me on 09/27/24 Electronically Signed By: Erin M. Karshen Assistant District Attorney State Bar #: 1036930

Electronically Signed By: SA Scott Marlock Complainant