

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.

JV1 went 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 <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 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