

STATE OF WISCONSIN CIRCUIT COURT MILWAUKEE COUNTY

STATE OF WISCONSIN

**DA Case No.: 2021ML003340
Court Case No.:**

Plaintiff,

vs.

LEWIS, KAMARE R
3927 WEST MEINECKE AVENUE
MILWAUKEE, WI 53210
DOB: 08/24/2003

CRIMINAL COMPLAINT

SPENCER, KEVIN T JR
1938 NORTH 26TH STREET, #A
MILWAUKEE, WI 53205
DOB: 07/02/2005

Defendant(s).

For Official Use

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

Count 1: FIRST DEGREE INTENTIONAL HOMICIDE - PTAC, AS A PARTY TO A CRIME (As to defendant Kamare R Lewis)

The above-named defendant on or about Wednesday, September 16, 2020, at 1859 North 40th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did cause the death of EL, another human being, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.05 Wis. Stats.

Upon conviction for this offense, a Class A Felony, the defendants shall be sentenced to imprisonment for life.

Count 2: FIRST DEGREE SEXUAL ASSAULT (GREAT BODILY HARM) - PTAC, AS A PARTY TO A CRIME (As to defendant Kamare R Lewis)

The above-named defendant on or about Wednesday, September 16, 2020, at 1859 North 40th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did have sexual contact (penis to mouth) with EL, without that person's consent, and caused great bodily harm to that person, contrary to sec. 940.225(1)(a), 939.50(3)(b), 939.05 Wis. Stats.

Upon conviction for this offense, a Class B Felony, the defendants may be sentenced to a term of imprisonment not to exceed sixty (60) years.

Count 3: FIRST DEGREE INTENTIONAL HOMICIDE - PTAC, AS A PARTY TO A CRIME (As to defendant Kevin T Spencer Jr)

The above-named defendant on or about Wednesday, September 16, 2020, at 1859 North 40th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did cause the death of EL, another human being, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.05 Wis. Stats.

Upon conviction for this offense, a Class A Felony, the defendants shall be sentenced to imprisonment for life.

Count 4: FIRST DEGREE SEXUAL ASSAULT (GREAT BODILY HARM) - PTAC, AS A PARTY TO A CRIME (As to defendant Kevin T Spencer Jr)

The above-named defendant on or about Wednesday, September 16, 2020, at 1859 North 40th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as a party to a crime, did have sexual intercourse (penis to vagina) with EL, without that person's consent, and caused great bodily harm to that person, contrary to sec. 940.225(1)(a), 939.50(3)(b), 939.05 Wis. Stats.

Upon conviction for this offense, a Class B Felony, the defendants may be sentenced to a term of imprisonment not to exceed sixty (60) years.

PROBABLE CAUSE:

Your complainant is a detective with the Milwaukee County Sheriff's Office (MCSO) assigned to the Criminal Investigation Division (CID). Your complainant bases this complaint on his training and experience, on information conveyed to him by other law enforcement officers, his first hand investigation into this matter and upon information obtained from police reports prepared by the Milwaukee County Sheriff's Office and other reliable sources, which your complainant has relied on in the past and found to be truthful.

The following summary of events, which form the factual basis for the above referenced charges, is based on interviews and information discovered during the course of the Milwaukee County Sheriff's Office's investigation into this matter.

Original Jurisdiction to Charge Minor Defendant Kevin Spencer

Furthermore, this complaint is filed in conformance with Wis. Stats. §938.183(1)(am) granting original adult court jurisdiction because the juvenile defendant, Kevin Spencer, is charged with First Degree Intentional Homicide as a Party to a Crime. Additionally, the charge of First Degree Sexual Assault as a Party to a Crime is issued pursuant to subsection (1)(ar) conferring original jurisdiction over charges that are joinable with the First Degree Intentional Homicide Charge.

Milwaukee County Sheriff's Office Deputy Sheriffs Respond to 911 Call Reporting Beaten and Unconscious Female Victim Located in Washington Park

On Wednesday, September 16, 2020 at approximately 21:36 hours the Milwaukee County Communications Division - Dispatch Center received a transferred 911 call from two subjects identified as LJ and KA regarding an unconscious half-naked adult female victim lying on the ground next to the pond at Washington Park located at or near 1859 N 40th Street, in the city and county of Milwaukee. The female victim, later identified as EL, was still breathing but unconscious at the time the two bystanders reported to have observed EL. It appeared EL had been severely beaten and left for dead.

The Milwaukee Fire Department and Milwaukee County Sheriff's Office deputies arrived on scene searched for, located, and started attending to EL. Deputies observed EL was undressed below the waistline, consistent with having been sexually assaulted, and that she had sustained multiple severe contusions to her face and head. E.L. was eventually transported to Froedtert Hospital for treatment.

EL's clothes (blue jean jacket, leggings, socks and shoes) were located scattered near a pink blanket that, on information and belief, the victim had been sitting or lying on shortly before being attacked. The blanket and clothing items were located approximately 100 yards northeast of the location of EL's body.

Sexual Assault Examination and Evidence Collection Conducted on EL

EL was unconscious and in a comatose and brain-dead state after the incident. A court order was obtained requiring a sexual assault examination be conducted on EL. On September 17, 2020, Deb Donovan, a Sexual Assault Nurse Examiner (SANE), assisted by two other SANE nurses, conducted a sexual assault examination and evidence collection procedure on EL.

During the examination numerous injuries consistent with sexual assault were noted. Specifically, in addition to the many inquiries EL sustained from having been severely beaten, Nurse Donovan reported that EL sustained a large (2.6 cm) laceration to her vaginal mucosa (the mucous membrane that lines the vagina cavity) and a contusion (bruising) to her cervix. Nurse Donovan noted that the laceration was significant and a type of injury not often observed during the course of her many years as a sexual assault nurse examiner.

During this examination Nurse Donovan took various evidentiary samples for DNA testing including vaginal swabs and external genital swabs among numerous other evidentiary samples.

This evidence along with EL's clothing and other items discovered at the scene (including juice bottles) were conveyed to the Wisconsin Regional State Crime Laboratory for DNA testing and analysis.

Death and Subsequent Autopsy of Victim EL

On September 19, 2020, your complainant was informed that EL was pronounced deceased by Dr. Amanda Wilcox at 18:57 hours on September 19, 2020.

An autopsy was performed on EL and it was determined by Dr. P. Douglas Kelly, of the Milwaukee County Medical Examiner's Office, that the victim's death was caused by blunt force trauma to her head and that the manner of EL's death was determined to be homicide.

Injuries Inflicted on EL During the Fatal Attack and/or Beating

As a result of sustaining blunt force trauma to her head, EL suffered from severe traumatic brain injuries as well as numerous other injuries to her person, including:

1. Anoxic brain injury (brain starved of oxygen)
2. Duret hemorrhage pons (bleeding mid-brain)
3. Left and right subdural hematomas (bleeding that occurs within the skull of head but outside the actual brain tissue)
4. Subgaleal hemorrhage (bleeding in the potential space between the skull and the scalp)
5. Cerebral contusions to frontal lobes (a form of traumatic brain injury consisting of bruising of the brain tissue)
6. Hemorrhage to temporalis muscle (bleeding to temple muscles)

7. Contusions to face (bruises) and abrasions (scratches) to the face
8. Contusions (bruises) to left ear and neck
9. Contusions (bruises) to lips
10. Fractured hyoid bone (hyoid bone is a small U-shaped mobile bone oriented in the horizontal plane just above to the larynx in the neck).
11. Blunt force injuries to her torso including a fractured left clavicle (broken collar bone)
12. Abrasions to her back and contusions to her buttocks.
13. Contusions to her upper and lower extremities including contusions to her forearms and her dorsal hands (back of her hands)

Video Recovered from the Urban Ecology Center Depicts Homicide of EL

Video collected for September 16, 2020 at around the beginning of the 20:00 hour from the Urban Ecology Center located in Washington Park depicts 5 to 6 people who were potentially involved in this incident. The individuals were observed running from the area where the victim's blanket and clothing were located to the area where EL's body was located and then they can be seen fleeing away from the location of E.L.'s unconscious body.

Although the footage is very dark and grainy it appears that EL is taken to a tree from the area of her blanket, on information and belief, and a portion of the sexual assault and beating appears to take place under the tree (at about 20:05). Afterward the video depicts at least two subjects who appear to be carrying or dragging EL's body to the area along the edge of the pond where she is eventually left for dead.

Investigation into this matter revealed that the persons observed in the above referenced surveillance video were probably teenage boys or young men who were associated with or in some manner knew each other.

Additional Relevant Surveillance Video

MCSO also obtained surveillance video from the Washington Park Library (located just north of Washington Park). Video obtained for the above referenced date from the exterior of the library depicts a group of about 11 subjects leaving the park between 20:21 and 20:27 hours. A group of 6 subjects, all on bicycles, with one bicycle carrying two people on it, left the park and rode north and loitered on the side of the library. Shortly thereafter a group of five subjects, with two on bicycles and three on foot are depicted traveling east on Lloyd Street from Washington Park.

MCSO deputies also obtained Milwaukee County Transit System (MCTS) bus video footage for the evening in question. Relevant footage was obtained from one bus that had been stopped on N. 40th Street and W. Lisbon Avenue facing north on N 40th Street at the red traffic signal. This portion of MCTS bus video captures what appears to be the same five subjects observed in the above described video leaving Washington Park and traveling east on Lloyd Street after the assault is believed to have taken place. One of the subjects, subsequently identified as defendant Kamare Lewis, is on foot walking in his socks holding his white tennis shoes with one hand.

Two of the subjects are on distinctive bicycles - one a BMX style bicycle that had unique appearing spokes in the tires and one a 'beach cruiser' bicycle, with a grey metal basket over the rear tire, large, thick tires, wide metal handlebars, fenders over both tires, and a thick seat. The subject on the 'beach cruiser' style bicycle had a white hospital surgical style mask pulled underneath his chin. The subject on the BMX style bicycle was wearing acid wash/light colored skinny jeans.

At approximately 21:01 hours, approximately 35 minutes after the assault/homicide appears to conclude, an Asian man is seen riding south through the park on the bike trail, passing the pond where EL was later located. This subject never called 911 and did not appear to hear or see EL at the pond while passing by.

At approximately 21:26 hours, MCSO received a 911 transfer from Milwaukee Police Department from a young male subject (LJ) who called reporting he and his cousin (KA) had just discovered the victim, EL, near the pond. The caller and his cousin remained on scene until MCSO deputies arrived.

On September 17, 2020, MCSO deputies conducted follow-up at 911 caller KA's home, where both KA and LJ live. Deputies asked KA if they could verify the time of the 911 call at which point KA's mother, who was also present, told KA to go inside and to "delete everything off of his phone."

Statement of Witness LJ

LJ called 911 to report allegedly locating the victim after coming upon her in the park; however, it was later learned from MCTS bus video that LJ was in the park at the time of the assault as he was observed on video walking on W. Lisbon Avenue at N. 40th Street with several subjects later identified as defendant Kamare Lewis (carrying his shoes), defendant Kevin Spencer, KB and possibly DE.

After being confronted with the fact that he was present in the park at the time the assault and homicide took place, LJ ultimately gave a detailed statement to investigators. LJ stated, in relevant part, that two subjects beat the victim EL and forced her to perform sex acts. LJ stated that one of these subjects was the black male carrying the shoes with the two-tone dreadlocked hairstyle observed in surveillance video. LJ identified this subject as a known subject called Mari who he identified in a photo as "Mari" or Kamare Lewis.

LJ identified the second subject involved in this incident as a dark-skinned subject also observed in the surveillance video. LJ positively identified this subject as "KJ" or defendant Kevin Spencer. LJ stated that he also personally observed Kevin Spencer beating the victim and participating in a penis to mouth sexual assault on the victim. LJ stated that both Lewis and Spencer were hitting and kicking the victim. He states that it was at this point that he left the scene.

LJ also admitted to later observing a video that was supposedly recorded on defendant Kamare Lewis's cell phone of defendant Lewis and defendant Kevin Spencer kicking and hitting the victim while she lay defenseless on the ground. LJ stated that both defendants were beating the victim but that Kevin Spencer was the more aggressive of the two subjects.

Statement of Witness KA

KA also was subsequently interviewed and confronted with video contradicting his statement that he and LJ had just found the victim and were not in the park at the time of the sexual assault and homicide.

KA stated, in relevant part, that he was in the park at the time of the incident and witnessed part of what happened. He stated that he had walked over by the tree (observed in the video from the Urban Ecology Center) and personally observed "Kamare with the dreads" who he positively identified as defendant Kamare Lewis hitting the victim with tree branches and punching her in the face. KA stated that defendant Lewis was with a second subject he positively identified as defendant Kevin Spencer known as "KJ" who was also beating the victim.

KA stated that the victim was laying on her blanket when Lewis and Spencer began kicking her. KA stated that the victim's face became swollen. KA stated that "once Kamare (Lewis) got done punching her, KJ (Spencer) told Kamare to put her in the water and that Kamare (Lewis) was dragging her to the water."

KA admitted he received a Facebook messenger video that was recorded by Kamare Lewis's cell phone. KA stated that the video depicted Kamare Lewis and Kevin Spencer beating the victim and laughing. KA admitted to showing the video to JR. He also admitted to deleting the video from his cell phone.

Statement of Witness JR Regarding Viewing the Video of the Beating that Resulted in the Homicide of EL

On January 12, 2021, Detective Gayle of MCSO received a phone call from KA's mother, JR, stating that her son (KA) may have a video we would be interested in seeing in his old iPhone. She stated that the video was sent to him via Facebook messenger by defendant Kamare Lewis but was later deleted. She believes that we would be able to recover the video and stated that MCSO could pick the cellphone up tomorrow from her son.

Detective Gayle asked JR what she saw on the video on her son's cell phone. JR stated she saw two boys beating a lady, hitting her in the face and her face was bloody. Detective Gayle asked if she could see who the boys were. JR stated you could tell who they were. She stated it was the boy "Kamare" with the "dreads" and the boy "KJ." JR identified these known subjects as being identified as defendants Kamare Lewis and Kevin Spencer respectively.

Detective Gayle asked if you could see anyone else in the video. JR stated that the two defendants were the only ones hitting the victim, but she stated that it looked like a lot of little kids standing around. Detective Gayle asked who sent her son the video and she stated the boy "Kamare" with the dreads (defendant Kamare Lewis). Detective Gayle asked who recorded the video and she stated KA said it was Kamare Lewis's phone and someone else had it but he could not or did not identify the person. Detective Gayle asked when they received the video and she stated about two days after the incident (approximately September 18, 2020).

Detective Gayle asked when the video was deleted. JR stated she told her son to get rid of the video because it doesn't have anything to do with him and told him and to stay away from Kamare Lewis. Detective Gayle asked when did her son showed her the video and she stated he didn't show her right away maybe a couple of weeks after the homicide.

Statement of Witness KG

KG was developed as a person of interest when a DNA Hit was reported by the Wisconsin State Regional Crime Lab when KG's DNA was located on one of the bottle/bottle caps located at the scene where the victim's blanket was located. KG's profile does not appear on any of the other items of evidence analyzed to date.

KG stated that the night of the homicide and sexual assault of EL, he walked to the park with defendants Kamare Lewis and Kevin Spencer. He stated they all saw this lady on a blanket in the park. He stated they walked up to her to see if she had any money and started harassing her.

KG went on to state the defendant Lewis started hitting her and that defendant Spencer then also started striking and kicking her. He stated that they also picked up sticks and hit her with the sticks and pulled her clothes off her and then proceeded to drag her to the area of the tree where the assault continued.

KG stated that at this point he didn't want to be involved and started to walk away. He stated that when he was trying to leave one of the defendants struck him with a juice bottle that the victim had brought into the park. KG contends that this is probably how his DNA profile got on the juice bottle. KG stated that when he left the park the two defendants were still assaulting the victim under the tree and that there were other kids gathered around.

Defendant Kevin Spencer Confessed to Witness KG

KG went on to tell investigators that at some point not long after the incident defendant Kevin Spencer called him and that they were talking about the incident in the park. KG stated that defendant Spencer told him that he and defendant Lewis continued beating the female victim in the park and that they were "getting her from back and front." KG stated that defendant Spencer told him that the two of them beat the victim and sexually assaulted the victim. Defendant Spencer stated that he was having penis to vagina sex with the victim from behind while the victim was performing oral sex (mouth to penis) on defendant Lewis. KG stated that defendant Spencer admitted that they continued to hit, slap, slam and kick the victim to the point of unconsciousness and that they then dragged or carried her to the area near the pond and left her for dead.

Inculpatory Statement of Defendant Kamare Lewis

On February 5, 2021, defendant Kamare Lewis gave an inculpatory *Mirandized* custodial statement to MCSO Detective April Johnson. Defendant Lewis stated in relevant part that on the above date at the above location, Washington Park, in the city and county of Milwaukee, on information and belief around 20:00 hours or shortly thereafter, he was with defendant Kevin Spencer and KG when they came upon the victim EL who was on a blanket in the park. He stated that they started harassing her and that KG was going through her belongings looking for money.

Defendant Lewis admitted to hitting the victim as well over the course of the incident but tried to downplay his role in the incident and indicated that defendant Spencer and "others" did most of the beating. He made vague reference to "others" (not himself or defendant Spencer) also beating the victim but failed to identify who these people were until toward the end of his statement when he claimed that LJ and KG participated to varying degrees in the assault and claiming that LJ was the last person with the victim after she was deposited in the water along her edge of the pond.¹

Defendant Lewis went on to state (incredibly) that the victim, EL, volunteered to have oral sex with the defendant and others who were present but that when other people (not identified by the defendant)

¹ It is of note that based on surveillance video it appears KG probably was not present, consistent with his statements to MCSO investigators, when the group left the park shortly after dumping the dying victim, EL, in the water at the edge of the pond. Additionally no DNA profile consistent with KG was located on the victim's body swabs or her clothing. Furthermore no DNA profile consistent with LJ or KA was located on any piece of evidence collected and analyzed to date.

came around the group started to “party” her which defendant Lewis described as “beating and jumping her.”

Defendant Lewis admitted that he himself did slap at the victim while she was performing oral sex on him because she was not doing it right and he could feel her teeth on his penis. He confirmed that defendant Kevin Spencer “fucked” the victim from behind while the victim was performing oral sex on him (Lewis) and that Spencer and others then beat the victim, EL.

Defendant Lewis suggested that defendant Spencer was the most aggressive individual and that defendant Spencer beat the victim, EL, more brutally as more people gathered. Defendant Lewis stated that he believed defendant Spencer “broke her (EL’s) jaw” causing her to “lose her breathe.” He stated that defendant Spencer at one point struck the victim so hard that he fell to the ground with the victim by the force of the blow he dealt. Defendant Lewis stated that during the course of the beating the victim was being “slapped, stomped and body slammed.”

Defendant Lewis stated that when they were done with her, the victim, EL, was struggling to breathe and gurgling and that she appeared to him to have a broken jaw. He stated that at his suggestion they then dragged the victim, EL, who by his own account was gurgling and unable to breathe, to the water and dumped her there in an effort to cover up the crime and possibly destroy evidence.

Defendant Lewis stated (during the course of at least two different interviews) that he never called for help because he thought EL was for all intents and purposes dead or soon to be dead and it wouldn’t have made a difference and that he didn’t really care about her because she is not someone he knows personally.

Preliminary DNA Testing Results Indicate that Defendants Kamare Lewis and Kevin Spencer Likely Deposited DNA on the Victim EL and/or on her Clothing Found at the Scene of the Sexual Assault and Homicide

Your complainant is aware that DNA Analyst Michelle Burns of the Wisconsin State Regional Crime Laboratory has indicated that preliminary results of DNA analysis of items from the sexual assault kit taken from EL and EL’s clothing located at the scene along with the buccal swab standards for defendants Kamare Lewis and Kevin Spencer.

Strong Support for the Inclusion of Both Defendants’ DNA Profiles on the Victim’s Denim Jacket

With regard to the victim, EL’s, denim jacket, which was located at the scene near her blanket in Washington Park, Analyst Burns reports that there is *strong support* for the inclusion of defendant Kamare Lewis’s STR-DNA in a DNA mixture on the exterior of the victim’s denim jacket. Additionally, she reports that there is also *strong support* for the inclusion of Defendant Kamare Lewis’s DNA on the outside of the sleeve of the victim’s denim jacket.

Analyst Burns further reports that there is *very strong support* for the inclusion of defendant Kevin Spencer’s DNA on the inside collar of the victim’s denim jacket as well as moderate support for the inclusion of defendant Kevin Spencer’s DNA on the outside of the left sleeve of the victim’s denim jacket.

Very Strong Support for the Inclusion of Defendant Kevin Spencer's DNA Profile on both the Vaginal and External Genital Swabs Taken from the Victim EL

Analyst Burns also reports that there is *very strong support* for the inclusion of defendant Kevin Spencer's DNA on the vaginal and external genital swabs of EL taken during the sexual assault exam conducted on brain dead EL shortly after the incident before she passed.

Very Strong Support for the Inclusion of Defendant Kevin Spencer's DNA Profile on the Victim, EL's, Leggings in Several Places

Analyst Burns further reports that there is also *very strong support* for the inclusion of defendant Kevin Spencer's DNA on the numerous areas on the victim's leggings located at the scene near the blanket. The areas include: the inside of the waistband, the ankles, the inside front and rear of the crotch and the inside hips.

Summary of Reasonable Inferences Drawn from the Totallly of the Information Known to Investigators

Based on the totality of the evidence gathered to date including witness and defendant statements, scene evidence, surveillance video and DNA evidence, the following reasonable inferences follow:

1. On the above reference date, September 16, 2020 at approximately 20:00 KG, Defendant Kamare Lewis, Defendant Kevin Spencer, KA and LJ and other teens are present in Washington Park.
2. KG, Defendant Lewis and Defendant Spencer see the victim minding her own business either sitting or laying out on a blanket in the park and begin to harass her and demand money. The harassment quickly escalates to physical violence as the two codefendants Lewis and Spencer begin to strike the victim.
3. During the course of beating the two defendants pull on EL's clothing and forcibly remove it as she struggles and cries for help. It is at this time that defendants Lewis and Spencer deposit their DNA on the victim's jacket and defendant Spencer deposits his DNA on the victim's leggings in various locations.
4. The two defendants then somehow move the victim either by dragging her or chasing her to the area of the tree where they proceed to continue to beat her with hands, feet and tree branches.
5. Once under the tree defendants Lewis and Spencer force EL to perform oral sex on them (compelling her compliance through physical violence or the threat thereof) and defendant Spencer then proceeds to rape EL by forcing penis to vagina sexual intercourse from behind while defendant Lewis forces her to perform oral sex.
6. It is during the penis to vagina sexual assault by defendant Spencer that EL probably sustains the large laceration to her vagina and the bruising to her cervix and when defendant Spencer deposits his DNA in her vagina and on her external genitals.
7. EL, unconscious or nearly unconscious, gurgling, unable to breathe properly and in obvious pain and distress is then dragged to the pond where these defendants dump her and leave her for dead.

8. EL was left to suffer and die at that pond and would have probably died in that spot, instead of the hospital, had LJ and KA not had the conscience to contact police and seek help for the dying victim.
9. The two defendants forced sexual contact and intercourse on EL, one can infer from the totality of the circumstances without her consent, while beating her which ultimately resulted in great bodily harm in the form of broken bones, bruising on most parts of her body and multiple severe and ultimately fatal brain injuries.
10. The two codefendants also aided each other in carrying out the sexual assaults and they acted as parties to the crime during both the sexual assaults and the homicide.
11. Additionally, at some point during the beating defendant Lewis has an unknown individual video record him and Spencer beating the victim using Lewis's phone. Defendant Lewis later sends this video to others present in the park, such as KA, perhaps to brag or for some other unknown reason.

Defendants Kamare Lewis and Kevin Spencer Intentionally Killed EL

Based on surveillance video, the accounts of witnesses and based on the severity and magnitude of the injuries to EL, one can infer that the codefendants, Kamare Lewis and Kevin Spencer, beat the very small framed victim over and over for a sustained period of time. They beat her extremely severely about the head. EL was so impaired when they finally finished beating her and sexually assaulting her that she was unable to talk or breathe.

Any reasonable person would be aware that his conduct in in this instance was *practically certain to cause result in the victim's death*. Further, the two defendants dumped the severely beaten victim that defendant Lewis contends could not breathe and appeared to have a broken jaw, in water and left her for dead. Defendant Lewis even remarked that it was not worth calling an ambulance because she was so severely beaten.

These defendants had to have known that their conduct was practically certain to cause the death of this victim. Accordingly, these defendants, acting as parties to the crime, intentionally caused EL's death.

CONTINUED ON NEXT PAGE

This complaint does not contain all known information in this case and investigation into this matter remains ongoing.

****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 Sara Beth Hill.
Subscribed and sworn to before me on 02/09/21
Electronically Signed By:
Sara Beth Hill
Assistant District Attorney
State Bar #: 1027610

Electronically Signed By:
Detective Brian Conte
Complainant