

FILED
05-13-2019
Clerk of Circuit Court
Kenosha County
2019CF000514
Honorable Mary Kay
Wagner
Branch 6

STATE OF WISCONSIN CIRCUIT COURT KENOSHA COUNTY

STATE OF Wisconsin
 Plaintiff,

CRIMINAL COMPLAINT

vs.

DA Case #: 2019KN002438

MARTICE T. FULLER
1387 30th Avenue #102
Kenosha, WI 53140
DOB: 05/16/2003
Sex/Race: M/B
Eye Color:
Hair Color:
Height: ;
Weight: ;
Alias: Also Known As Martice
Travon Fuller

Agency Case #: KPD 2019-00024978

Defendant.

For Official Use

The undersigned, being first duly sworn, states that:

Count 1: FIRST DEGREE INTENTIONAL HOMICIDE, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Thursday, May 9, 2019, in the City of Kenosha, Kenosha County, Wisconsin, did cause the death of K.L.J., DOB: 08/28/03, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.63(1)(b) Wis. Stats., a Class A Felony, and upon conviction shall be sentenced to imprisonment for life.

And further, invoking the provisions of sec. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

Count 2: ATTEMPT FIRST DEGREE INTENTIONAL HOMICIDE, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Thursday, May 9, 2019, in the City of Kenosha, Kenosha County, Wisconsin, attempted to cause the death of Stephanie A. Juga, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.32, 939.63(1)(b) Wis. Stats., a Class B Felony, and upon conviction may be sentenced to a term of imprisonment not to exceed sixty (60) years.

And further, invoking the provisions of sec. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

Count 3: ARMED BURGLARY

The above-named defendant on or about Thursday, May 9, 2019, in the City of Kenosha, Kenosha County, Wisconsin, did intentionally enter a dwelling without the consent of the person in lawful

possession of the place, and with intent to commit a felony,, while armed with a dangerous weapon, contrary to sec. 943.10(2)(a), 939.50(3)(e) Wis. Stats., a Class E Felony, and upon conviction may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than fifteen (15) years, or both.

PROBABLE CAUSE:

Deputy Lanctot of the Kenosha Sheriff's Department indicates that on May 9, 2019 at approximately 3:02 p.m., he received word from Kenosha Dispatch that there had been shooting at 10914 66th Street in the City and County of Kenosha, State of Wisconsin. Deputy Lanctot indicated he arrived at that location and observed the overhead garage door of the residence was open. Deputy Lanctot made entry through the garage and began clearing the residence.

Deputy Eckert of the Kenosha Sheriff's Department, who also responded to the scene, indicated he made contact with Stephanie Juga in the bedroom of the residence. Deputy Eckert also indicated that K.L.J. (DOB: 08/28/03) was lying on the floor. Mrs. Juga stated to Deputy Eckert that she had been shot in the chest and arm. Deputy Eckert further observed that K.L.J. had a gunshot wound on the right side of her head and a gunshot wound to her chest.

Detective Brietchaft of the Kenosha Police Department indicated he spoke to Stephanie Juga regarding this incident. Mrs. Juga stated that on May 9, 2019, she was at her home at the above address with her daughter K.L.J. and that K.L.J. was in her room listening to music after school. Mrs. Juga stated she was in the main bathroom of the residence when she heard a blood curdling scream from K.L.J. followed by a bang and followed by another scream. Mrs. Juga indicated she walked towards K.L.J.'s room and standing on the threshold of her daughter's room, she saw her daughter's ex-boyfriend, defendant Martice Fuller. Mrs. Juga indicated the defendant pointed a firearm at her and that Mrs. Juga pleaded with the defendant, "You don't have to do this". The defendant replied to Mrs. Juga, "Yes, I have to." Mrs. Juga indicated she attempted to shut the door, but was shot in the left arm and wrist by the defendant. Mrs. Juga again tried to shut the door, which was then kicked open by the defendant. Mrs. Juga stated she was shot again by the defendant at that time. Mrs. Juga indicated she retreated to the master bathroom and locked herself in the bathroom. Mrs. Juga then called her husband and called 911.

Douglas Kelly, a Doctor with the Milwaukee County Medical Examiner's Office, indicated he conducted an autopsy of K.L.J. on May 10, 2019, and found four separate gunshot wounds to her chest. Dr. Kelly indicated he also found a single gunshot wound to the head of K.L.J. and rendered the opinion that these gunshot wounds were the cause of death.

Lisa Meyer, Registered Nurse at St. Catherine's Hospital in Kenosha, indicated that Stephanie Juga was cared for on May 9, 2019 by Dr. Campbell. RN Meyer indicated she personally was involved in the care of Mrs. Juga and that Mrs. Juga had sustained two gunshot wounds. One round entered and exited Mrs. Juga's left wrist, causing a fracture, as well as nerve damage in her wrist. The same round entered Mrs. Juga's left chest area.

RN Meyer indicated a second a second round entered the right chest area of Mrs. Juga, travelling down her rib cage and was still imbedded in her body.

Detective Brennan of the Kenosha Police Department indicated that on May 10, 2019, he interviewed Annshaniece Andrews, who described herself as a cousin of the defendant. Ms. Andrews indicated the defendant arrived at her house at approximately 11:00 p.m. on May 9, 2019 and told her about the shooting. Ms. Andrews indicated the defendant stated that he went into K.L.J.'s house with intent to only shoot her twice. Ms. Andrews stated the defendant told her that he went in through the garage and saw K.L.J. was wearing headphones listening to music. Ms. Andrews stated that the defendant admitted he then shot K.L.J. and she screamed, which freaked him out; at which point, he shot her additional times.

Ms. Andrews indicated the defendant stated that K.L.J.'s mom then came running and so he shot her too and then fled the residence.

Detective Brennan indicated that Ms. Andrews was the one who contacted the Kenosha Police Department indicating the defendant wished to turn himself in on May 10, 2019 in Racine.

Detective Cepress of the Kenosha Police Department indicated that on May 10, 2019, he spoke to juvenile A.F. (DOB: 06/13/03), who indicated the defendant had spent the night at her home on May 8, 2019 and was still at her home on May 9, 2019 in the early afternoon hours. A.F. indicated the defendant asked her for a ride to a friend's house at some time just after 1:00 p.m. Detective Cepress noted that the location identified by A.F. that the defendant was dropped off was approximately 10 blocks from the residence of K.L.J. A.F. indicated that she picked the defendant up again at his request at between 3:20 p.m. and 3:30 p.m., at approximately the same location she dropped him off. The defendant had on the same pair of shoes, but they were now dirty, and he was highly upset. A.F. indicated that the defendant told her it was really bad and that a group of girls who the defendant knew had shot K.L.J. and he was crying at this time.

Ms. Andrews indicated to Detective Brennan that the defendant told her that, after he had shot the two individuals, that he changed clothes, got on his bike and was picked up a friend.

Detective Deates of the Kenosha Police Department indicated that on May 10, 2019, he spoke to the defendant, who stated that he had not been at K.L.J.'s home on May 9, 2019. The defendant stated that he had been dropped off on May 9, 2019 at his home at about 12:00 p.m. and napped at his own home from Noon to 2:45 p.m. when he woke up and went for a walk near Parkside.

Detective Kenesie of the Kenosha Police Department indicated that he spoke to the defendant's mother, Alice Fuller, on May 11, 2019. Ms. Fuller originally told the Detective that the defendant was home at her home from Noon to approximately 3:00 p.m. on May 9, 2019 and then left to go walking at Parkside. Detective Kenesie indicated that Ms. Fuller eventually admitted to Detective Kenesie that she had made that story up and that she said it to help her son, the defendant. Ms. Fuller then indicated to Detective Kenesie that her son had not been at her home on the date of May 9, 2019, prior to the 3:00 p.m. shooting at any time.

Detective Kenesie indicated that he had reviewed on May 10, 2019, the video from the neighbor across the street's camera, which depicts the outside of 10914 66th Street, during the time of the incident. Detective Kenesie indicated he observed, that at just prior to 3:00 p.m., a person matching the description of the defendant entered the driveway of the Juga residence and entered through the garage door. Detective Kenesie indicated that he heard a loud echo within 2 ½ minutes consistent with a gunshot, and that 15 seconds later, there are 6 more loud echoes consistent with gunshots. Detective Kenesie indicated that just after 3:00 p.m., the same male

subject who had entered the house 3 minutes earlier, now exited the garage door and is seen running west on the north sidewalk. Detective Kenesie indicated no other persons entered or exited the residence during the time period of this video.

Your complainant is an attorney with the Kenosha County District Attorney's Office, who bases his/her knowledge of this complaint on:

- The official law enforcement agency reports of the Kenosha Police Department prepared by Detective Brietchaft, Detective Brennan, Detective Cepress and Detective Deates, which reports were prepared in the normal course of law enforcement duties;
- The official law enforcement agency reports of the Kenosha Sheriff's Department prepared by Deputy Lanctot and Deputy Eckert, which reports were prepared in the normal course of law enforcement duties;
- Statements by citizen informant(s) Stephanie A. Juga, A.F. (DOB: 06/13/03), and Annshaniece Andrews; who are eyewitnesses to the facts they relate;
- Statements by the defendant, which were made contrary to his penal interests;
- The official records of: The Circuit Court for Kenosha County; The Department of Transportation; The FBI Triple I Teletype; The Wisconsin Circuit Court Automated Program, which records are maintained in the normal course of business duties.

MDG:ed

Subscribed and sworn to before me on 05/13/19

Electronically Signed By:

Jessica L. Krejcarek

Assistant District Attorney

State Bar #: 1083091

Electronically Signed By:

Michael D. Graveley

Complainant