

STATE OF WISCONSIN	CIRCUIT COURT	LA CROSSE COUNTY
STATE OF WISCONSIN	DA Case No.: 2022LC000488	
Plaintiff,	Assigned DA/ADA: Jessica Skemp	
	Agency Case No.: 10-22-07114	
	10-22-07144	
vs.	Court Case No.:	
	ATN: 32000000495681	
Curtis William Ross		
235 7th Street South		
La Crosse, WI 54601		
DOB: 03/10/1988		
Sex/Race: M/B		
Eye Color: Brown		
Hair Color: Black		
Height: 5 ft 06 in		
Weight: 145 lbs		
Alias: Also Known As Daniel A		
Carpenter		
Alias DOB: 06/29/1988		
Defendant.		

CRIMINAL COMPLAINT

Sergeant Brandon Penzkover, La Crosse County Sheriff's Department, being first duly sworn on oath says that on information and belief:

Count 1: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY

The above-named defendant on or about Tuesday, February 22, 2022, at Near the 1400 Block of Vine Street, in the City of La Crosse, La Crosse County, Wisconsin, did recklessly endanger the safety of Hayden Halverson, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

Count 2: POSSESSION OF A FIREARM BY A FELON

The above-named defendant on or about Tuesday, February 22, 2022, at Near the 1400 Block of Vine Street, in the City of La Crosse, La Crosse County, Wisconsin, did possess a firearm, having been convicted of a felony in this state, contrary to sec. 941.29(1m)(a), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 3: POSSESSION WITH INTENT TO DELIVER HEROIN (<=3G)

The above-named defendant on or about Tuesday, February 22, 2022, at Near the 1400 Block of Vine Street, in the City of La Crosse, La Crosse County, Wisconsin, did possess with intent to deliver a controlled substance, to-wit: Heroin, in an amount of 3 grams or less, contrary to sec. 961.41(1m)(d)1, 939.50(3)(f) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

Count 4: POSSESSION WITH INTENT TO DELIVER COCAINE (<=1G)

The above-named defendant on or about Tuesday, February 22, 2022, at Near the 1400 Block of Vine Street, in the City of La Crosse, La Crosse County, Wisconsin, did possess with intent to deliver a controlled substance, to-wit: Cocaine, in an amount of 1 gram or less, contrary to sec. 961.41(1m)(cm)1g, 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

Count 5: FELONY BAIL JUMPING - NEW CRIMES

The above-named defendant on or about Tuesday, February 22, 2022, at 300 7th St S, in the City of La Crosse, La Crosse County, Wisconsin, having been arrested for or charged with a felony and having been released from custody under Chapter 969 Wis. Stats., did intentionally fail to comply with the terms of his bond, to wit: to commit no new crimes, contrary to sec. 946.49(1)(b), 939.50(3)(h) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

and prays that the defendant be dealt with according to law; that the basis for complainant's charge of such offense is:

FACTUAL BASIS:

Your complainant is informed in an official report by Officer Lang that on February 22, 2022 at approximately 1:28 am officers were dispatched to a theft call for service originating from the 200 block of 7th Street South in the City and County of La Crosse Wisconsin. He reported that A.T. contacted dispatch and stated that a male named Curtis was stealing her vehicle, described as a blue Chevrolet Traverse. Officer Lang reported that A.T. provided dispatch with updates as to the vehicle's location and then stated that the vehicle stopped in an alley near the intersection of 16th Street and Main Street and the male had taken off running. She stated the male was wearing a black hoodie and khaki pants.

Your complainant is also informed in an official report by Officer Halverson that he was near 15th Street North and Vine Street and observed a black male wearing a black jacket and khaki pants run north in the 1400 block of Vine Street and into the yard of 1431 Vine. Officer Halverson reports that he turned onto the 300 block of 15th Street North and his headlights illuminated the male as he was running. The male was running Northbound and extended his right arm. Officer Halverson then observed a muzzle flash and heard a shot fired in his direction. Officer Halverson estimated that he was 20 to 25 yards away from the male at the time of the shot. Officer Halverson then activated his lights and he observed the male turn and run Westbound in the alley of 300 15th Street North.

Officer Lang reported that Officer Halverson radioed that he observed a suspect running and that person had fired a gun at him. Officer Halverson stated the suspect was running Westbound near the 1400 block of Pine Street. Officer Lang reported that a witness, T.A., had called dispatch and had given updates on the suspect's location and described him as a black male wearing khaki pants. T.A. stated that the male was last seen crouching by a black car near the UWL Center for the Arts and may be hiding underneath it. Officer Lang stated the male was located and surrendered to officers. The male was identified as Curtis Ross. Ross was taken into custody and Officer Lang searched him and found a large amount of cash in his left pocket, later determined to be _____, a white jewelry box containing gold jewelry, a loaded magazine for a 9mm handgun, and car keys to A.T.'s vehicle.

Officer Kapanke reports that he searched the area where Ross was lying and located in between two vehicles a small plastic baggie with a white substance and underneath the car where Ross was lying was another small plastic baggie with a brown substance. Those items were later weighed by Officer Marcon.

Your complainant is further informed in an official report by Officer Eddy that he spoke with witness T.A. T.A. stated he was visiting with his girlfriend at her apartment in the 1400 block of Vine Street. T.A. heard a gunshot and looked out the window and saw a male wearing a white shirt and gray pants hiding by a tree and observed a gun tucked into the male's waistband. T.A. stated he saw the male "ditch" the gun and then travel Northbound toward the Northwest corner near the Center for the Arts building.

Officer Marcon reports that he assisted with a search of the area and the following items were located: a silver and black pistol lying on the ground near 1431 Vine Street, which was loaded with a round in the chamber, a spent shell casing was found under a nearby vehicle, a gem bag containing a gold necklace in the parking lot of 1425 Vine Street, a black puffy jacket in the parking lot of 1425 Vine Street, a clear plastic bag containing 3.3 grams of suspected cocaine, a clear plastic bag containing 4.0 grams of suspected heroin. It is on information and belief that those quantities of controlled substances are inconsistent with personal use and that they were intended to be delivered.

Your complainant is informed that the defendant has been convicted of the felony offense of Possession of a Firearm by a Felon on September 22, 2010 in Milwaukee County Circuit Court Case number 10CF2241. It is on information and belief that conviction is of record and unreversed.

Your complainant is also informed that the defendant was charged in La Crosse County Circuit Court with the felony offenses of Possession of a Firearm by a Felon and Possession of Cocaine with Intent to Deliver in case number 21CF686. On or about September 13, 2021 the defendant was released from custody on a \$1000 signature bond with a statutory condition that he commit no further crimes while on bond. It is on information and belief that bond was in full force and effect on the date of this new offense.

Subscribed and sworn to before me on 02/23/22

Electronically Signed By:

Eric S Sanford

Assistant District Attorney

State Bar #: 1085718

Electronically Signed By:

Lucas

Complainant

