

FILED
06-24-2024
CIRCUIT COURT
DANE COUNTY, WI
2024CF001483

JSL WARRANT
Assign to Branch

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

STATE OF WISCONSIN

Plaintiff,

vs.

JEROME L JACOBS JR

1145 Petra Pl
Madison, WI 53713

DOB: 02/14/1987

Sex/Race: M/B

Eye Color: Brown

Hair Color: Black

Height: 5 ft 10 in

Weight: 170 lbs

Alias: Also Known As Jerome L
Jacobs Jr

Also Known As Jerome L. Jacobs

Defendant,

Ref. Agency: Madison (City) Police
Department

DA Case No.: 2024DA005792

Assigned DA/ADA:

Agency Case No.: 2024-00245602

Court Case No.: **24CF**_____

ATN:

CRIMINAL COMPLAINT

For Official Use

The below-named complaining witness being first duly sworn states the following:

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

The above-named defendant on or about Sunday, June 9, 2024, in the City of Madison, Dane County, Wisconsin, attempted to cause the death of CES, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.32, 939.63(1)(a) 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)(a) Wis. Stats., because the defendant committed this crime while using a dangerous weapon, the maximum term of imprisonment may be increased by not more than 6 months.

Count 2: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, June 9, 2024, in the City of Madison, Dane County, Wisconsin, did recklessly endanger the safety of DD, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(a) 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.

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And further, invoking the provisions of sec. 939.63(1)(a) Wis. Stats., because the defendant committed this crime while using a dangerous weapon, the maximum term of imprisonment may be increased by not more than 6 months.

FACTS:

Your complainant is a Court Officer with the City of Madison Police Department and for this complaint is relying on the written police report(s) submitted by City of Madison Police Officer(s) Issac Ashe and Detective Joseph Buccellato.

On June 9, 2024, City of Madison Police Officer Asche responded to the 1-100 block of Andrew Way, City of Madison, Dane County, Wisconsin for a report of gunshots and people who were injured. Responding officers located a victim, CES, in the driveway with a gunshot wound to his forehead. CES was transported by Madison Fire EMS to University of Wisconsin Hospital, where he was taken into surgery. Bullet fragments were too deeply imbedded to be removed at the time, and he remains in critical condition and has not regained consciousness.

Officer Asche located a second victim, DD, with a graze wound to his left chest and lower back. These were described by medical staff as superficial and non-life threatening. DD was treated and released. During scene processing, 18 fired shell casings, all 9mm were located in the street where witnesses observed the shooter.

A witness, PW, reported an individual she knows to be JEROME JACOBS (the defendant hereinafter, verbally identified and confirmed via LERMS) drove past the 1-100 block of Andrew Way in a dark Chevy Trailblazer, firing a handgun toward the residence. She stated she knows the defendant to have a birthday on Valentine's Day. PW provided a license plate for the Chevy Trailblazer as Wisconsin tag 23866AFT. PW said she saw the defendant standing over her sister, CW, and was "beating the dog shit out of her." The defendant then got into a dark SUV, drove a short distance away, then returned to the residence. This is when he fired a handgun towards the residence. PW said there were between 6 to 10 people varying in age from 2 years old to about 16 years old at the residence, inside and outside, who were gathered for a party.

Your complainant is aware that Jerome Jacobs Junior (the defendant), date of birth 02/14/1987, was located in the LERMS database.

CW stated she is in a relationship with the defendant and has children by him. CW reported the defendant came to her residence in the 1-100 block of Andrew Way, and was intoxicated. There was a passenger, KH, in the SUV with the defendant.

KH information was queried through Wisconsin DOT and it was learned he is on probation. WI DOC was contacted and a probation hold warrant was issued for KH. He was located and arrested on the warrant on June 11, 2024.

KH reported the following to Detective Buccellato: He was present with the defendant during the shooting on Andrew Way. They were in a black Chevy SUV and the defendant was driving. The defendant had been physically fighting with CW at the Andrew Way residence, while he (KH) was in the vehicle outside. The defendant left the residence after about 10 or 15 minutes,

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and they drove to another residence. The defendant took some money and clothing inside the second location and returned about 10 or 15 minutes later. The defendant then drove back to Andrew Way, with KH still in the vehicle. When they arrived in the 1-100 block of Andrew Way, there was a group of people in the driveway. The defendant exited the SUV and then he heard gunshots. He thought the defendant was shooting into the air. The defendant then drove away, dropping him off at a different location. He realized what had happened when he saw the news the next day about two people being shot.

The license plate 23866AFT was queried through Wisconsin DOT. This returned to a black Chevy Trailblazer owned by Midwestern Wheels, Incorporated, doing business as Avis Rent a Car. Avis was contacted and was able to provide historical GPS data for the vehicle, as well as the renter of vehicle, JF. They also advised the vehicle had been returned and exchanged for another rental. The SUV was not in service because their technician located a fired 9mm shell casing inside during routine inspection. City of Madison Police Forensic Services and Detectives responded to Avis, processed the vehicle, and recovered the 9mm shell casing.

Avis advised JF rented a different vehicle, a gray 2023 Kia Sportage bearing Wisconsin license plate 17540AFT. They advised this vehicle was stationary at the Best Western Hotel in the 3300 block of Mondovi Road, in Eau Claire, Wisconsin. Assistance was requested from Eau Claire PD. They located the vehicle and attempted to stop it, but the vehicle fled with the single male driver. The driver was not apprehended and the vehicle was recovered.

****THIS COMPLAINT IS BASED ON** the information and belief of your complainant, who is a Court Officer for the City of Madison Police Department, and who learned of the above offense from the reports of City of Madison Police Officer(s) Issac Ashe and Detective Joseph Buccellato, which report your complainant believes to be truthful and reliable inasmuch as they were prepared during the course of the officer(s) official duties.

Further, your complainant believes the information furnished by witness(es) to be truthful and reliable inasmuch as they are citizen informant(s) and witnessed the events described.

Your complainant believes the statements of the Defendant(s) to be truthful and reliable insofar as they are admissions against penal interest.

Subscribed and sworn to before me on
06/24/24

Electronically Signed By:
Frank J. Remington
Assistant District Attorney
State Bar #: 1101919

Electronically Signed By:
TAYA M DOLSEN
Complainant