

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

STATE OF WISCONSIN

Plaintiff,

vs.

JARREON D CUNNINGHAM

56 S Gammon Rd Apt B

Madison, WI 53717

DOB: 11/03/1998

Sex/Race: M/B

Eye Color: Brown

Hair Color: Black

Height: 5 ft 8 in

Weight: 126 lbs

Alias:

Ref. Agency: Madison (City) Police
Department

DA Case No.: 2018DA005199

Assigned DA/ADA: Timothy J. Helmberger

Agency Case No.: 2018-00200895

Court Case No.: 2018CF001123

ATN: 13016500015830

For Official Use

ERIC M MORGAN

56 S Gammon Rd Apt B

Madison, WI 53717

DOB: 08/20/1998

Sex/Race: M/B

Eye Color: Brown

Hair Color: Black

Height: 5 ft 7 in

Weight: 120 lbs

Alias:

Court Case No.: 2018CF001124

ATN: 13016500015822

AMENDED CRIMINAL COMPLAINT

Defendants,

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

Count 1: ARMED ROBBERY - PTAC (As to defendant Jarreon D Cunningham)

The above-named defendant on or about Friday, June 1, 2018, in the City of Madison, Dane County, Wisconsin, as a party to a crime, with intent to steal, did take property from the person or presence of the owner, R.J.L., T.L.M., D.M.P. and L.E.S-S , by use or threatening use of a dangerous weapon, contrary to sec. 943.32(2), 939.50(3)(c), 939.05 Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

Count 2: ARMED ROBBERY - PTAC (As to defendant Eric M Morgan)

The above-named defendant on or about Friday, June 1, 2018, in the City of Madison, Dane County, Wisconsin, as a party to a crime, with intent to steal, did take property from the person or presence of the owner, R.J.L., T.L.M., D.M.P. and L.E.S-S , by use or threatening use of a dangerous weapon, contrary to sec. 943.32(2), 939.50(3)(c), 939.05 Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

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) Gracia Rodriguez, Kraig Knutson, Brian Covington, and Detective(s) Lindsey Ludden and Danielle Hall.

Officer Rodriguez reports on June 1, 2018, at approximately 4:26 p.m., west district officers were dispatched to 56 S Gammon Road, reference a disturbance. While in the parking lot of 7178 Tree Lane, in the City of Madison, Dane County, Wisconsin, four subjects in a red Toyota Corolla entered the parking lot and approached Officer Rodriguez. A female, whose name forms the initials LES-S, who had been in the driver's seat began to tell Officer Rodriguez they had just been robbed at gun point. The suspect's description at that time was given to Officer Rodriguez as two black males in their late teens/early twenties. One suspect had short dreads and the other had short hair with a Chicago black hoodie.

Officer Rodriguez first spoke with an individual who was identified via a Wisconsin ID card but for the purpose of this complaint will be known by his initials as TLM. TLM stated the following: the robbery had occurred on Tree Lane, near the first parking lot to the right when entering from South Gammon Road. He had been sitting in the passenger side rear seat when the robbery occurred. They had parked on Tree Lane when the two black male suspects approached the vehicle on foot. As soon as the suspects approached the vehicle, the suspect with the gun first stated something to the extent of, "Yo what's up, what's going on." After that statement, the same suspect pulled out a gun, pointing it at all vehicle occupants. The suspect with the gun then immediately stated, "Give me your money." He described the suspect with the gun as a black male in his early twenties with short hair, wearing a black hoodie with the words, "STRAIGHT OUT OF/OUTTA CHICAGO." The suspect with the gun had gray shorts and the gun was described as a black, 9mm "baby" handgun. The suspect had "racked" the gun, putting a round in the chamber. This was a real gun and had been on the suspect's waistband, right side. Suspect number two had short dreads. He handed all the cash he had on his person to suspect number one. He was scared and did not want anyone to get shot, therefore he gave away all the money he had, \$180.00 in US currency.

Officer Rodriguez spoke with DMP (verbally identified) who had been sitting on the driver's side, rear seat when the robbery occurred. DMP described the suspect with the gun as a black male, late teens, wearing a black hoodie from Chicago. DMP could not recall what suspect number one was wearing for pants. DMP stated that they had been at BP last night and gave one of the suspects a ride to Tree Lane. Through investigation, Officer Rodriguez found out that one of the suspects had exchanged phone numbers with one of the males in the red car and the suspect had been calling the victim throughout the day. The suspect phone number shown to Officer Rodriguez ended in 2941. Officer Rodriguez asked LES-S if she knew the name of the suspect but she stated she did not know the name. LES-S later admitted that the individuals involved were ones she had met the previous evening near the Woodman's by a gas station. LES-S stated she did not have any names but showed Officer Rodriguez that the one subject was on Snapchat as "SAKBOYDINERO." LES-S stated that the subject with the dreads said something along the lines of "gimme your money." LES-S stated the subject with the dreads was asking for some cash. LES-S stated after this initial "gimme the money" the

subject with the dreads pulled out a black handgun which she described was more to the front of his waistband.

RJL (verbally identified) who had been a passenger in the red victim vehicle advised the suspect wearing the "straight out of Chicago" shirt, produced a black handgun. RJL stated the suspect pointed the gun at TLM, who was in the front passenger seat. RJL stated the suspect "pointed a gun straight at their faces," and said, "Gimme all your money." RJL advised that one of the suspects names as Eric Morgan.

About two minutes after the victims left, they came back to the parking lot where officers had been speaking with them. LES-S got out of the vehicle and approached officers stating she found the suspect vehicle and it was parked in front of the buildings that formed a "horse shoe" around the parking lot. Officers drove to where the suspect location had been advised in front of 56 S Gammon. Officer Knutson observed the suspect vehicle and the registered owner came back to an individual fully identified but for this complaint will be known as DAM from 56 S Gammon Road, #B.

Later on in the investigation, DAM stated that her grandsons had been driving the Chevy Impala last night during half time of a game they were watching at home. Per DAM, her two grandsons had only been away for 15 minutes. DAM called her grandsons to come to the living room. The first grandson walked into the room and was later identified verbally and confirmed by DOT records as Jarreon D. Cunningham ("Cunningham"), the defendant. The second individual was identified verbally and confirmed via DOT records as Eric M. Morgan ("Morgan"), the defendant. Officer Rodriguez noted that Cunningham matched the description of suspect 1 and Morgan matched the description of suspect 2. Both Cunningham and Morgan admitted to being at the BP gas station the previous night speaking to the group of subjects in the red Toyota. Cunningham and Morgan also admitted to being at the BP in the maroon Chevy Impala.

Det. Hall reports on June 2, 2018, she, along with Det. Ludden responded to 56 S Gammon Road, apartment B, and executed a search warrant. Det. Ludden and Det. Hall initiated the search in the bedrooms, where DAM stated her grandsons stayed. When Det. Hall found the Taurus Millennium G2 9mm handgun in the black plastic bin in bedroom 1 and it had been covered by other bedding and clothing items within the bin. Det. Hall removed the magazine from the magazine well and noted that the magazine was loaded with 12 unfired cartridges. Det. Ludden also located a black hoodie with "Straight outta Chicago" on the front in bedroom 2.

Det. Ludden spoke with LES-S on June 4, 2018, and she stated TLM used her phone to Snapchat with the suspect with the dreads, identified as Eric Morgan. RJL told Det. Ludden, "I will be honest, TLM and I were trying to buy weed." Det. Ludden asked RJL how much they planned to buy and he stated the purchase was supposed to be \$180 and that the money taken was all TLMs. Det. Ludden asked RJL how he felt during the robbery and he said, "I knew the gun was real and I was definitely scared," and, "I have never had a gun pointed at my face." Det. Ludden ran the serial number (TKU25265) of the recovered Taurus handgun through NCIC and the handgun came back as stolen out of Madison, WI.

Det. Ludden interviewed Morgan and asked him how he and Cunningham met the other people and he said, "met them at the gas station," and clarified that it was the BP gas station.

Det. Ludden asked Morgan what she was going to see on the video from BP and he changed his answer and said he drove "the Chevy," which was maroon or reddish color. Morgan stated he told the group that he could get them some weed and they "trailed" him over there (Tree Lane) and then they got a "little dub" and then they took off.

Det. Ludden spoke with Cunningham and he stated while walking around the outside the apartment complex he got a call from the people (victims) saying they would be there soon. Det. Ludden asked Cunningham if he gave them directions and he said that he gave them 56 S Gammon Road and he thought they just put it in a GPS. Cunningham said that he saw them pull into the lot in the red car and he put his arm up in the air and they saw him. Det. Ludden asked which lot they pulled into and Cunningham said that it was not the lot where they live but instead they pulled into the lot on the playground side on Tree Lane. Det. Ludden asked Cunningham who was with them at that point when the people arrived in the red car and he said it was just him and his cousin Eric Morgan. Cunningham stated they handed him the money, which was \$180, and he instantly went back toward the building. Det. Ludden asked Cunningham where the \$180 was presently, and he said, "I hope it is still in my room."

RJL provided Officer Covington with a phone number for the suspects. Officer Covington tried calling the number but no one answered. Later, while officers were in Apartment B at Gammon Road, Cunningham gave Sergeant Perez consent to look through the call history on a black Samsung ZTE cell phone. Officer Covington looked through the call history on the phone and noted a missed call from his work cell phone. He also saw the call log included RJL's phone number.

During the interview with Det. Ludden, Cunningham admitted he was the person communicating with the victims relating to a drug deal involving marijuana. Cunningham provided written consent to search any and all data on his iPhone. The phone was processed by Investigator Shaul and a copy of the phone data was provided to Det. Ludden. Det. Ludden noted the iPhone device was named "Jarreon's iPhone." Det. Ludden also physically examined the phone and noted that it had the Snap Chat application installed. The Snap Chat account that loaded on the phone displayed the vanity name "\$akBoy Dinero" and user name "bandman_nero." Det. Ludden found that the iPhone contained numerous photographs of Cunningham and Morgan, drugs, money, and guns.

****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) Gracia Rodriguez, Kraig Knutson, Brian Covington, and Detective(s) Lindsey Ludden and Danielle Hall, 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 DAM, DMP, LES-S, TLM, and RJL 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
07/02/18

Electronically Signed By:
Rebekah M. Rennie
Assistant District Attorney
State Bar #: 1097619

Electronically Signed By:

John Amos
Complainant