

FILED
01-12-2022
Clerk of Circuit Court
Waukesha County
2021CF001848

STATE OF WISCONSIN CIRCUIT COURT WAUKESHA COUNTY

STATE OF WISCONSIN

Plaintiff,

vs.

Darrell E Brooks
4014 N 19Th St
Milwaukee, WI 53209
DOB: 02/21/1982
Sex/Race: M/B
Eye Color: Brown
Hair Color: Black
Height: 5 ft 7 in
Weight: 126 lbs
Alias:

Defendant.

DA Case No.: 2021WK007545
Assigned DA/ADA: Susan L. Opper
Agency Case No.: 21-047493
Court Case No.: 2021CF001848

ATN: 68006003143373
68006003143373

Kevin Costello

**SECOND
AMENDED CRIMINAL COMPLAINT**

The undersigned, of the Waukesha County District Attorney’s Office, being first duly sworn on oath, upon information and belief, states that:

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

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did cause the death of VICTIM A, 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: FIRST DEGREE INTENTIONAL HOMICIDE, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did cause the death of VICTIM B, 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.

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Count 3: FIRST DEGREE INTENTIONAL HOMICIDE, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did cause the death of VICTIM C, 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 4: FIRST DEGREE INTENTIONAL HOMICIDE, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did cause the death of VICTIM D, 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 5: FIRST DEGREE INTENTIONAL HOMICIDE, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did cause the death of VICTIM E, 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 6: FIRST DEGREE INTENTIONAL HOMICIDE, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did cause the death of VICTIM F, 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.

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Count 7: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM G, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 8: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM H, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 9: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM I, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 10: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM J, under circumstances which show utter disregard for human life, contrary to sec.

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941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 11: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM K, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 12: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM L, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 13: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM M, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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)(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 14: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM N, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 15: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM O, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 16: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM P, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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.

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Count 17: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM Q, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 18: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM R, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 19: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM S, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 20: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM T, under circumstances which show utter disregard for human life, contrary to sec.

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941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 21: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM U, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 22: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM V, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 23: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM W, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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)(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 24: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM X, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 25: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM Y, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 26: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM Z, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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.

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Count 27: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM AA, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 28: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM BB, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 29: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM CC, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 30: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM DD, under circumstances which show utter disregard for human life, contrary to sec.

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941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 31: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM EE, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 32: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM FF, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 33: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM GG, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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)(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 34: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM HH, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 35: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM II, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 36: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM JJ, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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.

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Count 37: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM KK, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 38: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM LL, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 39: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM MM, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 40: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM NN, under circumstances which show utter disregard for human life, contrary to sec.

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941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 41: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM OO, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 42: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM PP, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 43: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM QQ, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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)(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 44: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM RR, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 45: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM SS, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 46: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM TT, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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.

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Count 47: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM UU, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 48: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM VV, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 49: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM WW, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 50: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM XX, under circumstances which show utter disregard for human life, contrary to sec.

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941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 51: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM YY, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 52: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM ZZ, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 53: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM AAA, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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)(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 54: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM BBB, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 55: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM CCC, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 56: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM DDD, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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.

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Count 57: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM EEE, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 58: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM FFF, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 59: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM GGG, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 60: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM HHH, under circumstances which show utter disregard for human life, contrary to sec.

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941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 61: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM III, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 62: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM JJJ, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 63: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM KKK, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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)(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 64: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM LLL, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 65: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM MMM, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 66: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM NNN, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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.

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Count 67: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did recklessly endanger the safety of VICTIM OOO, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.63(1)(b) 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 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 68: HIT AND RUN - RESULTING IN DEATH

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did operate a vehicle involved in an accident that resulted in death of VICTIM A and failed to reasonably investigate what was struck and if the operator knew or had reason to know that the accident resulted in injury or death of a person or in damage to a vehicle that is driven or attended by a person, and failed to stop the vehicle he was operating as close to the scene of the accident as possible and remain at the scene of the accident until he did the all of the following: give his name, address and the registration number of the vehicle he or she was operating to the operator or occupant of or person attending any vehicle collided with and, upon request and if available, exhibit his operator's license to the operator or occupant of or person attending any vehicle collided with and render reasonable assistance to any person injured in the accident, including transporting, or making arrangements to transport the person to a physician, surgeon, or hospital for medical or surgical treatment if it is apparent that medical or surgical treatment is necessary or if requested by the injured person, contrary to sec. 346.67(1) and 346.74(5)(d), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 343.31(3)(j), the Department shall revoke the defendant's operating privilege for five (5) years.

Count 69: HIT AND RUN - RESULTING IN DEATH

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did operate a vehicle involved in an accident that resulted in death of VICTIM B and failed to reasonably investigate what was struck and if the operator knew or had reason to know that the accident resulted in injury or death of a person or in damage to a vehicle that is driven or attended by a person, and failed to stop the vehicle he was operating as close to the scene of the accident as possible and remain at the scene of the accident until he did the all of the following: give his name, address and the registration number of the vehicle he or she was operating to the operator or occupant of or person attending any vehicle collided with and, upon request and if available, exhibit his

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operator's license to the operator or occupant of or person attending any vehicle collided with and render reasonable assistance to any person injured in the accident, including transporting, or making arrangements to transport the person to a physician, surgeon, or hospital for medical or surgical treatment if it is apparent that medical or surgical treatment is necessary or if requested by the injured person, contrary to sec. 346.67(1) and 346.74(5)(d), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 343.31(3)(j), the Department shall revoke the defendant's operating privilege for five (5) years.

Count 70: HIT AND RUN - RESULTING IN DEATH

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did operate a vehicle involved in an accident that resulted in death of VICTIM C and failed to reasonably investigate what was struck and if the operator knew or had reason to know that the accident resulted in injury or death of a person or in damage to a vehicle that is driven or attended by a person, and failed to stop the vehicle he was operating as close to the scene of the accident as possible and remain at the scene of the accident until he did the all of the following: give his name, address and the registration number of the vehicle he or she was operating to the operator or occupant of or person attending any vehicle collided with and, upon request and if available, exhibit his operator's license to the operator or occupant of or person attending any vehicle collided with and render reasonable assistance to any person injured in the accident, including transporting, or making arrangements to transport the person to a physician, surgeon, or hospital for medical or surgical treatment if it is apparent that medical or surgical treatment is necessary or if requested by the injured person, contrary to sec. 346.67(1) and 346.74(5)(d), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 343.31(3)(j), the Department shall revoke the defendant's operating privilege for five (5) years.

Count 71: HIT AND RUN - RESULTING IN DEATH

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did operate a vehicle involved in an accident that resulted in death of VICTIM D and failed to reasonably investigate what was struck and if the operator knew or had reason to know that the accident resulted in injury or death of a person or in damage to a vehicle that is driven or attended by a person, and failed to stop the vehicle he was operating as close to the scene of the accident as possible and remain at the scene of the accident until he did the all of the following: give his name, address and the registration number of the vehicle he or she was operating to the operator or occupant of or person attending any vehicle collided with and, upon request and if available, exhibit his operator's license to the operator or occupant of or person attending any vehicle collided with and render reasonable assistance to any person injured in the accident, including transporting,

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or making arrangements to transport the person to a physician, surgeon, or hospital for medical or surgical treatment if it is apparent that medical or surgical treatment is necessary or if requested by the injured person, contrary to sec. 346.67(1) and 346.74(5)(d), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 343.31(3)(j), the Department shall revoke the defendant's operating privilege for five (5) years.

Count 72: HIT AND RUN - RESULTING IN DEATH

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did operate a vehicle involved in an accident that resulted in death of VICTIM E and failed to reasonably investigate what was struck and if the operator knew or had reason to know that the accident resulted in injury or death of a person or in damage to a vehicle that is driven or attended by a person, and failed to stop the vehicle he was operating as close to the scene of the accident as possible and remain at the scene of the accident until he did the all of the following: give his name, address and the registration number of the vehicle he or she was operating to the operator or occupant of or person attending any vehicle collided with and, upon request and if available, exhibit his operator's license to the operator or occupant of or person attending any vehicle collided with and render reasonable assistance to any person injured in the accident, including transporting, or making arrangements to transport the person to a physician, surgeon, or hospital for medical or surgical treatment if it is apparent that medical or surgical treatment is necessary or if requested by the injured person, contrary to sec. 346.67(1) and 346.74(5)(d), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 343.31(3)(j), the Department shall revoke the defendant's operating privilege for five (5) years.

Count 73: HIT AND RUN - RESULTING IN DEATH

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, did operate a vehicle involved in an accident that resulted in death of VICTIM F and failed to reasonably investigate what was struck and if the operator knew or had reason to know that the accident resulted in injury or death of a person or in damage to a vehicle that is driven or attended by a person, and failed to stop the vehicle he was operating as close to the scene of the accident as possible and remain at the scene of the accident until he did the all of the following: give his name, address and the registration number of the vehicle he or she was operating to the operator or occupant of or person attending any vehicle collided with and, upon request and if available, exhibit his operator's license to the operator or occupant of or person attending any vehicle collided with and render reasonable assistance to any person injured in the accident, including transporting, or making arrangements to transport the person to a physician, surgeon, or hospital for medical or surgical treatment if it is apparent that medical or surgical treatment is necessary or

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if requested by the injured person, contrary to sec. 346.67(1) and 346.74(5)(d), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 343.31(3)(j), the Department shall revoke the defendant's operating privilege for five (5) years.

Count 74: FELONY BAIL JUMPING

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, having been 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, 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.

Count 75: FELONY BAIL JUMPING

The above-named defendant on or about Sunday, November 21, 2021, on Main Street, in the City of Waukesha, Waukesha County, Wisconsin, having been 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, 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.

Count 76: MISDEMEANOR BATTERY, DOMESTIC ABUSE

The above-named defendant on or about Sunday, November 21, 2021, at Frame Park, in the City of Waukesha, Waukesha County, Wisconsin, did cause bodily harm to VICTIM PPP, by an act done with intent to cause bodily harm to that person, without that person's consent, contrary to sec. 940.19(1), 939.51(3)(a), 968.075(1)(a) Wis. Stats., a Class A Misdemeanor, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

And further, invoking the provisions of sec. 968.075(1)(a) Wis. Stats., because this charge is an act of domestic abuse, costs upon conviction would include the domestic abuse assessment imposed under sec. 973.055(1) Wis. Stats.

Count 77: MISDEMEANOR BATTERY, DOMESTIC ABUSE

The above-named defendant on or about Saturday, November 20, 2021, at Frame Park, in the City of Waukesha, Waukesha County, Wisconsin, did cause bodily harm to VICTIM PPP, by an act done with intent to cause bodily harm to that person, without that person's consent, contrary to sec. 940.19(1), 939.51(3)(a), 968.075(1)(a) Wis. Stats., a Class A Misdemeanor, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

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And further, invoking the provisions of sec. 968.075(1)(a) Wis. Stats., because this charge is an act of domestic abuse, costs upon conviction would include the domestic abuse assessment imposed under sec. 973.055(1) Wis. Stats.

PROBABLE CAUSE:

And prays that the defendant be dealt with according to law; that the basis for the complainant's charge of such offense is: Based upon the information from various law enforcement officers with the City of Waukesha Police Department, believed to be truthful and reliable in this instance.

On November 21, 2021, Detective Casey was working traffic control for the annual Waukesha Christmas Parade, which was being held in the downtown area of the City of Waukesha, Waukesha County, Wisconsin. He was assigned to traffic control at the intersection of White Rock Avenue and East Main Street. The staging area for the parade participants was on White Rock Avenue from Perkins Avenue south to East Main Street. There were approximately one hundred entries in the parade, with hundreds of participants, and thousands of people watching the parade. The parade had already started and there were numerous people, vehicles, and floats already on the parade route on East Main Street.

At approximately 4:35 p.m., Detective Casey heard via the Waukesha police radio that a reserve officer was informed by a citizen that two people were fighting in the area of White Rock School. Squads were sent to that area to further investigate. A few minutes later, Detective Casey heard a horn honking from an area north of his location. Detective Casey went out onto White Rock Avenue to see where the horn sound was coming from. He observed that White Rock Avenue was filled with parade participants, as was East Main Street. He began to see people spreading apart and observed a red Ford Escape driving southbound on White Rock Avenue. He observed people jumping out of the way of the red Ford Escape. As the Ford Escape was at White Rock Avenue and East Main Street, Detective Casey stepped in front of the Ford Escape and pounded on the hood of the vehicle and yelled multiple times, "Stop." Detective Casey was wearing a shirt with patches on both shoulders that stated, "Waukesha Police", as well as wearing a black hat with white letters on the front of the hat which stated "Police". Further, he was wearing a neon orange safety vest that stated "Police" on the front and back of it.

The Ford Escape continued driving and turned westbound on East Main Street. At that time, the vehicle was driving at a slow speed and the vehicle brushed Detective Casey back off of the front of the car, causing him to be positioned down the driver's side of the vehicle. Detective Casey went to the driver's side window and pounded on the driver's side door yelling, "Stop". Detective Casey subsequently positively identified the driver of the Ford Escape as Darrell E. Brooks, Jr., DOB: 2/21/82, hereinafter referred to as the defendant. The defendant drove past Detective Casey and into the parade procession. Detective Casey chased the vehicle to East Avenue on foot and he observed the vehicle begin to drive faster. Detective Casey broadcast over the radio that the red Ford Escape had entered the parade route and he needed squads to respond in an emergency fashion. A few seconds later, Detective Casey heard on the police radio that the vehicle was striking people and was continuing westbound on East Main Street.

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While the defendant was driving westbound on Main Street, he struck numerous pedestrians, which included both parade participants and spectators located on the side of the street.

Detective Casey later observed three adult victims in the road in the 300 block of W. Main Street. These victims were subsequently identified as VICTIM A, VICTIM B AND VICTIM C. All three of these victims had traumatic injuries as a result of being hit by the vehicle the defendant was driving and all three were subsequently pronounced dead. VICTIM D, an adult, was transported to Waukesha Memorial Hospital and she subsequently died as a result of the injuries she sustained as a result of being struck by the defendant's vehicle. VICTIM E, an adult, was transported to Aurora Summit and he subsequently died as a result of the injuries he sustained as a result of being struck by the defendant's vehicle. Dr. Lynda Biedrzycki and Dr. Amy Sheil of the Waukesha County Medical Examiner's office have completed external examinations on all of the deceased victims. They have concluded the Cause of Death for Victim A, Victim B, Victim C, Victim D and Victim E was multiple blunt force injuries.

Detective Casey further reports that on November 23, 2021, he was advised that another parade participant, Victim F, a child, had died in the hospital. Detective Casey reported Victim F had suffered significant injuries as a result of being hit by the vehicle the defendant was driving. Dr. Amy Sheil of the Waukesha County Medical Examiner's office performed an autopsy on Victim F and concluded the Cause of Death was Craniocerebral Injuries from Blunt Force Trauma to the Head.

Officer Butryn was assisting with crowd control in the area of East Main Street and North East Avenue. At approximately 4:38 p.m., Officer Butryn heard on his radio that a car was traveling westbound, approaching the parade route. Officer Butryn observed a red Ford Escape traveling westbound on White Rock Avenue, approaching East Main Street. He began walking onto East Main Street, into the parade, in an attempt to get the driver's attention, stop the vehicle and redirect the vehicle from the parade route. The vehicle turned right onto East Main Street, toward Officer Butryn. As the vehicle was traveling westbound on East Main Street, Officer Butryn was standing directly in-line with the vehicle, wearing a full City of Waukesha Police Department uniform. He put his hand up and yelled, "Stop, stop the vehicle" multiple times.

Based upon his training and experience, Officer Butryn estimated the vehicle's speed to be approximately 25 miles per hour. The vehicle was initially sticking to the north side of the road, in the open lane between the parade participants and spectators. Officer Butryn observed the driver looking straight ahead, directly at him, and it appeared he had no emotion on his face. As the vehicle passed his location, Officer Butryn continually yelled for the vehicle to stop. The vehicle continued traveling westbound on East Main Street, and passed through the intersection of East Main Street and Buckley Street. Officer Butryn concluded that if the driver was lost and attempting to get out of the parade, this would have been a reasonable location for him to stop and exit the parade route. The vehicle continued westbound on East Main Street and was honking its horn. As the vehicle got to approximately Martin Street, it appeared to Officer Butryn that the vehicle began to increase its speed. As the vehicle was traveling westbound, the vehicle began getting closer to parade spectators, and almost struck a small juvenile who was standing in one of the parking stalls on the north side of the road as its speed was increasing.

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The vehicle then got to the intersection of East Main Street and NW Barstow Street, and it appeared the brakes were activated. Officer Butryn believed the vehicle was going to come to a stop and attempt to make a right hand turn out of the parade route, onto NW Barstow Street. However, the vehicle then appeared to rapidly accelerate, as Officer Butryn heard tires squeal. The vehicle took an abrupt left turn into the crowd of parade participants. At this point, it was clear to Officer Butryn that this was an intentional act to strike and hurt as many people as possible. Officer Butryn continued to run westbound on East Main Street, trailing the vehicle and its path. He observed the vehicle appeared to be intentionally moving side to side, striking multiple people, and bodies and objects were flying from the area of the vehicle. As Officer Butryn got to the area of the Subway restaurant on East Main Street, Officer Butryn began to encounter multiple casualties. Multiple people were pulling at him, saying that they needed assistance with injured parties. Based on the on-going threat of the vehicle and the occupant, Officer Butryn asked those assisting with the casualties as he passed, if they were breathing, and advised them to stay with them and that ambulances were on the way. Officer Butryn continued to chase after the vehicle on foot in order to stop the threat the driver posed.

Detective Casey spoke with Officer Scholten, who indicated he saw the Ford Escape traveling southbound on West Main Street, approaching Wisconsin Avenue, running over people. Officer Scholten shot at the vehicle three times, striking it three times.

Detective Trussoni spoke with multiple citizen witnesses who were present during the parade. One witness indicated, "As I continued to watch the SUV, it continued to drive in a zig zag motion. It was like the SUV was trying to avoid vehicles, not people. There was no attempt made by the vehicle to stop, much less slow down."

Detective Trussoni spoke with another witness who described the same zig zag driving pattern by the SUV and the witness further indicated, he felt it was "a direct intent to hit as many parade participants."

In addition to the deaths, Detective Casey reports several dozen people were endangered and injured by the conduct of Brooks.

Detective Casey reports that VICTIM G was participating in the parade as part of the RE/MAX Services First Group. VICTIM G was struck directly by the SUV in the street near the area of Smart Asset Realty located at 200 W. Main St. VICTIM G suffered substantial bodily harm per §939.22(38), Wis. Stats., as a result of being struck.

Detective Casey reports that VICTIMS H-Q were participating in the parade as part of the Waukesha South Band. VICTIMS H-K and M-Q were struck directly by the SUV in the street near the area of Divino Gelato/ Subway located at 215 and 227 W. Main St. VICTIMS H-K and M-Q were all injured as a result of being struck by the SUV. The injuries ranged in severity from bodily harm per §939.22(4), Wis. Stats., to great bodily harm per §939.22(14), Wis. Stats. VICTIM L was walking in the street as the SUV approached the group. VICTIM L reported that he was not sure if he was hit or knocked down by someone else that was hit which then caused him to be knocked down, but it did occur as the SUV drove into his group. VICTIM L suffered bodily harm.

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Detective Casey reports that VICTIMS R and S were participating in the parade as part of the Burris Logistics group. VICTIMS R and S were struck directly by the SUV near the area of the antique store located at 259 W. Main St. VICTIMS R and S were both injured as a result of being struck by the SUV. The injuries ranged in severity from bodily harm to substantial bodily harm.

Detective Casey reports that VICTIMS T, U, V and W were participating in the parade as part of the Waukesha Blazers Baseball team. VICTIMS T, U, V and W were directly struck by the SUV near the area of the Waukesha Civic Theater located at 264 W. Main St. VICTIMS T, U, V and W were all injured as a result of being struck by the SUV. The injuries ranged in severity from bodily harm to great bodily harm.

Detective Casey reports that VICTIMS X-LL were participating in the parade as part of the Waukesha Xtreme Dance team. VICTIM X, AA and CC were walking in the street near the area of W. Broadway and W. Main Street as the SUV approached the group. VICTIM X, AA and CC reported that they were not sure if they were hit by the SUV or struck by someone else that was hit, but it did occur as the SUV drove into their group and they all suffered injuries. VICTIMS Y, Z, BB and DD-LL were struck directly by the SUV in the street near the area of W. Broadway and W. Main St. VICTIMS Y, Z, BB and DD-LL were all injured as a result of being struck by the SUV. The injuries ranged in severity from bodily harm to great bodily harm.

Detective Casey reports that VICTIMS MM, NN and OO were participating in the parade as part of the Milwaukee Dancing Grannies. VICTIMS MM, NN and OO were struck directly by the SUV in the street in the 300 block of W. Main St. VICTIMS MM, NN and OO were all injured as a result of being struck by the SUV. The injuries ranged in severity from bodily harm to great bodily harm.

Detective Casey reports that VICTIMS PP-HHH were participating in the parade as part of the Catholic Community of Waukesha. VICTIM PP was walking in the street near the area of 426 W. Main St. as the SUV approached the group. VICTIM PP reported that she hurt her leg but was unsure if it was due to being struck by the SUV or another person, but it did occur as the SUV drove into her group. VICTIM TT also reported he was walking in the street and he believed the people next to him were hit and that person was pushed into VICTIM TT, causing injury to him. VICTIMS QQ-SS and UU-HHH were all struck directly by the SUV and were all injured as a result of being struck by the SUV. The injuries ranged in severity from bodily harm to great bodily harm.

Detective Casey reports that VICTIMS III and JJJ were spectators who were present to observe the parade. VICTIMS III and JJJ were on the side of the road and struck by the SUV near the area of W. Broadway and W. Main St. VICTIMS III and JJJ were both injured as a result of being struck by the SUV. The injuries resulted in substantial bodily harm to both.

Detective Casey reports that VICTIMS KKK and LLL were spectators who were present to observe the parade. VICTIMS KKK and LLL were on the side of the road and struck by the SUV near the area of 231 W. Main St. VICTIMS KKK and LLL were both injured as a result of being struck by the SUV. The injuries ranged in severity from bodily harm to substantial bodily harm.

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Detective Casey reports that VICTIMS MMM, NNN and OOO were spectators who were present to observe the parade. VICTIMS MMM, NNN and OOO were on the side of the road and struck by the SUV near the area of 340 W. Main St. VICTIMS MMM, NNN and OOO were all injured as a result of being struck by the SUV. The injuries ranged in severity from substantial bodily harm to great bodily harm.

Detective Casey further reports the distance Brooks drove from the point of first striking VICTIM G near the start of the parade route until he struck multiple persons walking with the Catholic Community of Waukesha was over 1/3 of a mile. Brooks struck parade participants from at least 8 different groups marching in the parade, spread out over the course of about 5 blocks, and some spectators along the way. All of the victims who were killed and most of the people that were injured were walking right down the middle of the road in plain view. Main Street was clearly closed to through traffic, there were barricades in place and police present to direct motorists for the entire length of the parade route.

Detective Casey has viewed multiple video recordings of the incident recovered from various businesses and citizen cell phone recordings. At no time does the vehicle stop to avoid striking any person. Detective Casey observed Brooks' vehicle intentionally striking multiple people from each of the groups in direct, head-on fashion. Detective Casey observed that at times, the vehicle traveled from the north side of the road to the south side of the road, striking several parade participants in the middle of the road along the way. Detective Casey further observed in the video recordings that Brooks increased the speed of the vehicle at times and rarely applied its brakes. Detective Casey further reports that some of the video recordings depict Brooks driving the SUV over persons who have been knocked down and on at least one occasion where the position of the vehicle changes horizontally as the SUV goes up and over persons laying in the road after being knocked over by Brooks' SUV. After this, Brooks does not stop but continues down the road, striking and killing several people. Detective Casey further reports that the video recordings also depict multiple people and objects being carried for a distance on the hood/windshield of the vehicle at various times after being struck by Brooks' SUV. At one point, Brooks leaned his head out the window to steer because there was a person on the windshield blocking his vision, however, Brooks does not stop but continues driving.

Detective Casey further reports that a complete mechanical inspection of the vehicle was performed by Mechanical Inspector Ryan Schultz with the Wisconsin State Patrol and all necessary functions such as steering, braking and accelerating were found to be fully operational.

Detective Behrendt reports that it was learned that Brooks had several open cases regarding domestic abuse incidents involving his ex-girlfriend, VICTIM PPP. Brooks had been charged in Milwaukee County case no. 2020CF002550 with two counts of Second Degree Recklessly Endangering Safety, Use of a Dangerous Weapon, contrary to Sections 941.30 (2) and 939.63 (1)(b), Wisconsin Statutes, and a third count of Possess Firearm-Convicted of a Felony, contrary to Section 941.29 (1m)(a), Wisconsin Statutes. Brooks made an initial court appearance in that case on July 28, 2020, and cash bond was set in the amount of \$10,000 with the condition that he not commit any further crimes. The bail was amended to \$7,500 cash with the same conditions on August 13, 2020. The bail was again modified down to \$500

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cash bail on February 9, 2021, with all previous conditions of bail remaining. Cash bail was posted and he was released on bail. This bail was in full effect on November 21, 2021.

Brooks was also charged in Milwaukee County case no. 2021CF004596 with one count of Resisting/Obstructing, contrary to Section 946.41, Wisconsin Statutes, Felony Bail Jumping, contrary to Section 946.49 (1)(b), Wisconsin Statutes, one count Second Degree Recklessly Endangering Safety-Domestic Abuse, contrary to Section 941.30 (2), and Section 973.055 (1), one count of Disorderly Conduct-Domestic Abuse, contrary to , contrary to Section 947.01 (1) and Section 973.055 (1), and one count of Battery - Domestic Abuse , contrary to Section 940.19 (1) and Section 973.055 (1). Brooks made an initial appearance on this case on November 5, 2021, and cash bail was set in the amount of \$1,000 with the condition that he not commit any further crimes and that he have no contact with VICTIM PPP. Cash bail was posted and he was released on bail. This bail was in full effect on November 21, 2021.

Detective Behrendt further reports that on November 21, 2021, she did interview VICTIM PPP. Detective Behrendt noticed that VICTIM PPP had her left eye extremely swollen and bruised and her right leg was in a boot. VICTIM PPP stated that she received the eye injury on November 20, 2021, from Brooks. She further reported that she had sustained a broken leg in a previous incident involving Brooks where he ran her over in a gas station parking lot. VICTIM PPP stated that Brooks drives a red Ford Escape, which belongs to his mother. VICTIM PPP reported that Brooks sleeps and lives in the vehicle.

VICTIM PPP reported that on November 20, 2021, she was in Frame Park in the City of Waukesha, Waukesha County, Wisconsin. VICTIM PPP reported that Brooks had called her and told her that he could see her and that she ultimately had contact with him that day at the park. VICTIM PPP reported that she and Brooks got into an argument and he hit her across her face with his right hand, causing the injury to her eye. VICTIM PPP stated that she is afraid of Brooks and that he has caused substantial injury to her in the past and has run her over with his vehicle.

VICTIM PPP further reported that on November 21, 2021, she also saw Brooks vehicle while she was hanging out at Frame Park. Brooks called her from a private number and she answered. VICTIM PPP reported that she met up with Brooks and he was alone in his car. VICTIM PPP stated that nothing physical happened. VICTIM PPP stated that she saw his car near Frame Park and that she walked up and got into the car and they started arguing. VICTIM PPP stated that they constantly argue over the fact that she did not bail him out of jail. VICTIM PPP stated that during the argument he threatened her to "make this end", but she wasn't sure exactly what he meant by that. VICTIM PPP reports that the last thing Brooks said to her was "Fuck you, bitch, erase my number", or something to that effect. VICTIM PPP stated that it was evident that the argument was not going anywhere and she was afraid she was going to be hurt again so she left the car and saw him drive off, driving past Frame Park at a high rate of speed.

Detective Guth reports that on November 22, 2021, he spoke with VICTIM PPP again. VICTIM PPP reported that she was not entirely truthful with Detective Behrendt on November 21, 2021, because she is fearful of Brooks. VICTIM PPP agreed to cooperate with Detective Guth and show him the area of Frame Park where she had contact with Brooks on November 21, 2021, around 4 p.m. VICTIM PPP stated that she was near the baseball diamond in the

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southeastern portion of the park and was looking at videos on her phone when she observed Brooks in the red Ford Escape parked nearby. VICTIM PPP reports that she did approach him and got into the vehicle. VICTIM PPP stated that Brooks was very upset and angry with her and accused her of talking to other guys on her phone and at one point attempted to take her phone from her. She also stated that he began driving around and while he was driving, she became fearful of his driving because he was driving fast and was only driving with one hand and was striking her in the face with his other hand. VICTIM PPP stated that as she was struck, this caused her pain and that he hit her and split her lip and caused her left eye to become swollen and puffy. They continued to argue as they drove down Baxter Street towards Buckley Street. When they approached the intersection of Corrina Boulevard and North Barstow, they drove up the Barstow hill. VICTIM PPP reported that Brooks continued to yell at her, call her names and tried to take her phone. They stopped at the intersection of Bidwell and NW Barstow and she got out of the SUV for her own safety. She stated that Brooks sped off in an unknown direction. She started walking southbound on NW Barstow back towards the Fox River. She was confronted again by Brooks in his motor vehicle and he was yelling out his window at her. She described this location as the gas station on the corner of North Street and NW Barstow. She continued to try and walk and call her friends for help. VICTIM PPP reported that Brooks was the only person in the SUV at this time. VICTIM PPP stated that she made her way back to Frame Park and that Brooks again confronted her in front of White Rock School.

Detective Guth reports that officers were able to obtain video footage of the red SUV and a partial video recording of a confrontation occurring in front of White Rock School at 4:31 p.m. on November 21, 2021. Victim PPP was with two friends. On the video recording, Detective Guth observed that one friend attempted to calm the situation but Brooks pushed the other friend in the face and then got into his SUV and began to drive off in a southwesterly direction towards Main Street. VICTIM PPP stated that was the last time she saw Brooks and his SUV.

Detective Casey further reports that the investigation revealed after Brooks left the parade route after having been fired upon by Officer Scholten, he drove to the area of 338 Maple Avenue in the red SUV and drove through a backyard, causing additional damage to the SUV. Brooks abandoned the vehicle at that point and is seen on various video recordings from businesses and homeowners walking through the neighborhood on foot. Brooks' appearance is changed and he is no longer wearing the light colored hoodie sweatshirt that he was wearing while driving the SUV on Main Street. That item was later found abandoned in a backyard. Detective Casey reports that the investigation revealed Brooks walked around the neighborhood for a short period of time, and eventually made contact with the homeowner of the residence at 553 Elizabeth Street. The police were out looking for the driver of the SUV and located Brooks at this location and took him into custody at 5:14 pm.

Detective Casey reports that at no time did Brooks, as the operator of the SUV involved in the multiple collisions, make any reasonable effort to investigate what was struck, and that he failed to stop the vehicle as close to the scene of the accident as possible, and did not remain at the scene of the accident.

Based on the foregoing, the complainant believes this complaint to be true and correct.

SLO:jam

STATE OF WISCONSIN - VS - Darrell E Brooks

Subscribed and sworn to before me on 01/12/22

Electronically Signed By:

Abbey L Nickolie

Assistant District Attorney

State Bar #: 1092722

Electronically Signed By:

Susan L. Opper

Complainant