

STATE OF WISCONSIN CIRCUIT COURT FOND DU LAC COUNTY

STATE OF WISCONSIN
Plaintiff,

vs.

JULIUS ANTWAN FREEMAN JR
92 W Division
Fond Du Lac, WI 54935
DOB: 09/27/1999
Sex/Race: M/B
Alias: Also Known As Julius A
Freeman
Also Known As Julius Ajr Freeman
Defendant.

DA Case No.: 2022FL001457
Assigned DA/ADA: Catherine Block
Agency Case No.: 22-415
Court Case No.:
ATN:

CRIMINAL COMPLAINT

For Official Use

The undersigned law enforcement officer of the Fond du Lac Police Department, being first duly sworn, states that:

Count 1: FIRST DEGREE INTENTIONAL HOMICIDE - PTAC, AS A PARTY TO A CRIME, REPEATER, USE OF A DANGEROUS WEAPON

The above-named defendant on or about Tuesday, January 18, 2022, in the City of Fond du Lac, Fond du Lac County, Wisconsin, as a party to a crime, did cause the death of VICTIM, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.05, 939.62(1)(c), 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. 939.62(1)(c) Wis. Stats., because the defendant is a repeater, having been convicted of a felony, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 6 years if the prior conviction was for a felony.

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: ARMED ROBBERY WITH USE OF FORCE - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant on or about Tuesday, January 18, 2022, in the City of Fond du Lac, Fond du Lac County, Wisconsin, as a party to a crime, with intent to steal, did take property from the person or presence of the owner, VICTIM, by use of force against the person of the owner, with intent thereby to overcome that person's physical resistance or physical power of resistance to the taking or carrying away of the property, and accomplished by use or threat of use of a dangerous weapon, contrary to sec. 943.32(1)(a) and (2), 939.50(3)(c), 939.05, 939.62(1)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

And further, invoking the provisions of sec. 939.62(1)(c) Wis. Stats., because the defendant is a repeater, having been convicted of a felony, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 6 years if the prior conviction was for a felony.

PROBABLE CAUSE:

Complainant bases this complaint upon the report and investigation of Detective Hahn of the Fond du Lac Police Department. Complainant and Detective Hahn are presumed reliable as sworn law enforcement officials.

SUMMARY

Julius Freeman and Eric Perry did, on or about October 17, 2021, cause the death of VICTIM, by a gunshot wound to the head, in that Freeman and Perry's actions were the substantial factor in producing the death via said gunshot wound. The VICTIM was located, deceased, at a residence on 8th Street in the City of Fond du Lac. Perry and Freeman acted with the intent to kill VICTIM. VICTIM was the owner of the US Currency taken (100 and 50-dollar bills) during this incident and VICTIM was in possession of the firearm (Glock Model 30SF 45 caliber pistol) that was missing from the scene of the crime. The firearm (Glock Model 30SF 45 caliber pistol) had been purchased by VICTIM and WITNESS 4 on October 11, 2021. Freeman and Perry did take and carry away the firearm and US Currency belonging to VICTIM without permission and with the intent to permanently deprive VICTIM of possession. Perry and Freeman acted forcibly in the taking of said property, which resulted in VICTIM's death by use of a firearm. Two male individuals were seen leaving the 8th Street in a dark/olive green colored SUV residence by WITNESS 1. A Green/Green 2004 Jeep Grand Cherokee SUV with a listed owner of WITNESS 3 was located at E. Scott St. #C in the City of Fond du Lac. WITNESS 3 is the girlfriend of Perry and said vehicle has been listed in numerous police contacts as associated with Perry. Serial numbers on money located in a search warrant at WITNESS 3's residence matched the serial numbers on money that was taken from VICTIM. Freeman admitted to Detectives and witnesses to having been with Perry with a plan to hit a lick, or rob, VICTIM on October 17, 2021. Perry admitted to WITNESS 3 to having "upped a gun on" VICTIM. WITNESS 7 told Detectives that Freeman told her that Lil E shot VICTIM in the head. Blood located on jeans belonging to Freeman was positively identified as that of VICTIM.

INITIAL OCTOBER 17, 2021 RESPONSE to 364 8th Street:

1. On 10/17/2021 at 11:56 PM, Officer. Gourdine and Officer. Schneider were dispatched to 8th St. in the City and County of Fond du Lac Wisconsin in response to WITNESS 1 reporting that she woke up to people running out of her house and a male, later identified as VICTIM, laying in a pool of blood. Officer. Gourdine was the first officer on scene, determined VICTIM was deceased and the residence was secured to preserve any evidence.
2. On 10/17/2021 Detective Vandermolen responded to the residence and observed the injuries to VICTIM, it appeared as though VICTIM had been shot in the head and there was a single shell casing in the dining room where VICTIM was located laying on his back in the dining room area of the residence. Also located in the dining room was a clear plastic bag containing a clear crystal like substance, which based on Detective Vandermolen's training and experience she believed to be methamphetamine. While Detective Vandermolen was on scene she talked with WITNESS 1. WITNESS 1 told Detective Vandermolen that earlier in the night, at approximately 6:30 PM, she, three of her kids and VICTIM had gone to the McDonalds on Military Rd in Fond du Lac. WITNESS 1 said VICTIM paid for the McDonalds and when VICTIM took the "wad" of cash out of his right pants pocket it was so big he could hardly fit his hands around it. WITNESS 1 said it looked like it was 100-dollar bills because it was "blue". No US Currency was located on VICTIM's person when officers arrived on scene. It was later learned that VICTIM was also believed to be in possession of a Glock Model 30SF 45 caliber pistol with Serial Number BSRT006, valued at \$629.99, at the time of his death.
3. On 10/17/2021 Detective Vandermolen responded to the residence and spoke with WITNESS 1, who told Detective Vandermolen that she had been sleeping upstairs in the residence and heard a noise downstairs which caused her to go downstairs and that is when she found VICTIM laying in a pool of blood in the dining room. WITNESS 1 also talked about witnessing two people run out of the residence, but she said she didn't know who these people were. The first person was wearing a black hoodie and she was unable to give any further description of the two people who left the residence. WITNESS 1 saw both individuals get into the back seat of an olive green boxy style SUV type vehicle that was parked in the driveway and fled the area eastbound on 8th St. WITNESS 1 informed Detective Vandermolen that she had been getting to know VICTIM for the last couple weeks. WITNESS 1 also informed Detective Vandermolen that earlier in the night she knew that VICTIM was in possession of a large sum of US Currency that was now missing from his possession that was in 100-dollar bill denominations. While processing the scene, Detectives located a gun box for a Glock Model 30SF 45 caliber pistol with Serial Number BSRT006 in the residence, however the gun was not located. VICTIM's cell phone was located in the kitchen of the residence and seized as evidence. VICTIM's cell phone was positively identified by WITNESS 1.

4. On 10/18/21 Detective Henning received information from WITNESS 2, who wished to remain anonymous at that time. WITNESS 2 indicated Lil E used the phone number of (920) 939-9131. This person also indicated that Lil E's first name was Eric, but this person didn't know Eric's last name.
5. Detective Henning informed Detective Hahn of the information that he learned from the anonymous person and Detective Hahn performed a search of (920) 939-9131 through TLO and it came back listed to Eric Lamont Perry DOB: 1/14/1994, listing an address of 255 Marquette St. #1 in the City of Fond du Lac Wisconsin.
6. Detective Hahn looked up Eric Perry in City of Fond du Lac Police Department in-house records and was able to locate Eric L. Perry DOB: 1/14/1994 listing an address of 255 Marquette St. #1 in the City of Fond du Lac, current as of 8/18/2021, and a cell phone number of (773) 632-7779. Also listed in the City of Fond du Lac Police Department in-house records was a vehicle associated with Perry in multiple Police contacts with a Wisconsin license plate of AHR-6779.
7. Detective Hahn performed a search of the Wisconsin license plate of AHR-6779 utilizing the Wisconsin Department of Justice Crime Information Bureau TIME System and the license plate returned listed to a Green/Green 2004 Jeep Grand Cherokee SUV with a listed owner of WITNESS 3 at E. Scott St. #C in the City of Fond du Lac.
8. On October 20, 2021 WITNESS 4 came into the City of Fond du Lac Police Department and spoke with Detective Henning about her firearm being stolen on October 17, 2021 between 2:30 PM and 4:00 PM. WITNESS 4 informed Detective Henning that the firearm had been purchased at Scheel's in Appleton. Detective Henning was later able to obtain video surveillance from Scheel's in Appleton showing WITNESS 4 and VICTIM together in Scheel's when the handgun was purchased. The handgun was identified by Detective Henning as a Glock Model 30SF 45 caliber pistol with Serial Number BSRT006, valued at \$629.99. Agent Ryan with the ATF confirmed that the gun associated with the Glock gun case located at 8th Street was purchased on 10/11/21 at Scheel's in Appleton by WITNESS 4.
9. On November 3, 2021 Detective Hahn interviewed WITNESS 4 and during that interview WITNESS 4 told Detective Hahn she believed the handgun she reported as being stolen on October 17 was actually in the possession of VICTIM at the time of his death. WITNESS 4 identified that gun as being VICTIM's, although she had purchased it. Detective Henning was able to confirm the gun box located at 8th St., during the investigation of VICTIM's death, matched the box and firearm that WITNESS 4 had purchased and later reported as being stolen. As of May 24, 2022 the handgun has not been recovered.
10. On 10/19/2021 Lt. Bobo received a phone call from a person who wished to remain anonymous, but wanted to give information in reference to this investigation. This person said they were calling in reference to the 26 year old male that was murdered in Fond du Lac. The person then said, "Lil E is responsible for the shooting". This person said Lil E's phone number is (920) 939-9131. This person also said the police should be looking for Lil E's kid's mother's jeep. This person identified Lil E's kid's mother as WITNESS 3. Furthermore this person said Lil E would be staying with WITNESS 3's sister, WITNESS 5. This person said the gun used in this homicide would be with Lil E.
11. Detective Hahn looked up WITNESS 5 in the City of Fond du Lac Police Department in-house records and was able to locate WITNESS 5 with an address of Marquette St., current as of 7/14/2021, and S. Brooke St., current as of 7/14/2021.

AUTOPSY conducted by Adam Covach October 21, 2021

12. An Autopsy Protocol report conducted by Adam Covach on consists of a cover page and 8 additional pages. The cover sheet lists the CAUSE OF DEATH for VICTIM to be a gunshot wound to the head. The MANNER OF DEATH is homicide. The report confirms an entry shot to the right temple of the head, 4 1/2" below the top of the head with the trajectory being from "back to front, right to left, slightly downward".
13. On October 26, 2021 Detective Hahn was assigned to serve a Search Warrant at E. Scott St. Apt. C in the City of Fond du Lac, the residence of WITNESS 3. Based on this investigation Detective Hahn is aware that WITNESS 3 was the girlfriend of Eric Perry. During the service of this Search Warrant \$600 in

US currency was located, 6-\$100 bills located in the upstairs south bedroom in the top left dresser drawer by Detective Kucharski. Detective Hahn noted the following serial numbers on the 6 \$100 bills:

ML70232203D, PL40092202C, PL73943708D, ML73925110D, ME28314590B and LB23270786K.

14. During the course of the investigation Lt. Bobo reviewed a video recording of VICTIM's Snapchat story was recorded at about 11:45am on October 18, 2021. The Snapchat story shows it is 13 hours old, which would mean the story was posted the day prior, October 17, 2021 within an hour of 10:45pm. VICTIM's Snapchat name shows a snowflake emoji 1,009 GRAMZ OF DOPE snowman emoji. The name under is "bigdogz448". The video starts with 100-dollar bills being placed on a counter. This counter appears to match the counter at 8th St where VICTIM was found dead. Furthermore, in this video on the counter there is a blue cup or water bottle, some sort of white cloth like item, and an item that has jagged edges next to the blue water bottle. Lt. Bobo reviewed the photos that Detective Meilahn took of the scene and in the area VICTIM's phone was located, which is near a corner area of the countertop, which appears to be the same in the video, there is a blue water bottle, a white cloth like item, and a set of food prongs with jagged edges on top of a wine glass. All which match the video. In the video, the second 100 dollar bill that was shown at the :56 mark of video, has the serial number **PL40092202C**. When comparing this serial number to the serial numbers of the six 100-dollar bills found in the dresser at 733-C E Scott St, there is an exact match to one of these 100-dollar bills. There are more 100-dollar bills being shown. At the :59 mark of the video, Lt. Bobo was able to see another serial number which matched one of the six 100-dollar bills that were found in the dresser at E Scott St. This serial number is **ML70232203D**. As noted by Officer Brown, there is a large amount of money being shown. In the video some serial numbers are seen and others that are not. While reviewing the video and seeing the 50-dollar bills being shown, Lt. Bobo was not able to see one of these bills that has a partial match of a serial number from a bill that was confiscated from Eric. The 50-dollar bills Eric had in his possession all had the first eights digits of MG431207. In VICTIM 's video, Lt. Bobo could see at the 1:13 mark, a 50-dollar bill with what appears to be MG4312. The rest of the serial number is covered by other bills.
15. On Friday December 3, 2021 Detective Hahn and Capt. Krause interviewed Julius A. Freeman in reference to this investigation. During this interview Freeman admitted to going to a house with Lil E/Eric Perry, and Freeman said when they went over there he never knew who was in the house and he never went in the house. Freeman says he was sitting in the car and he didn't hear a shot or anything. Freeman says when Lil E came outside the first thing Lil E said was, "he ain't here no more". Freeman said he looked at Lil E and asked him who, as Freeman was on his phone. Freeman said Lil E said he tried to, "up pipe" on him and he points out that VICTIM always had a gun on him. Freeman said he didn't believe it and Lil E started shaking. During this same interview Detective Hahn said, the way he's interpreting what Freeman's saying, was that Lil E was going over there to rip VICTIM off. Freeman is quiet and stutters and says, "if that is what he was thinking" and Freeman says that wasn't what he was thinking because he doesn't know anything about him, referring to Eric Perry. Freeman points out that when he sees Eric Perry, they are cool and when he's around they kick it, but Freeman doesn't know about Eric Perry robbing dice games. Detective Hahn then points out he has a question in his mind because if they, Freeman and Perry, don't hang out, but they're cordial, why would Eric Perry bring Freeman along with to rip off VICTIM as a possible witness. Freeman responds that he did not know anything so he was not able to tell WITNESS 4 and them about Lil E and who he met up with. Freeman says he was still thinking that he heard so many stories and he was wondering where VICTIM died at. Freeman goes on to say he knew 8th St., "like a minute ago" through the news and then they rode past. Detective Hahn explained that sounded weird and Freeman says he didn't tell him anything and he didn't know anything.
16. On December 9, 2021 Detective Hahn and Capt. Krause interviewed Julius Freeman and during this interview Freeman then talked about the night of VICTIM's death and how earlier that night there was a conversation with WITNESS 4, Lil E and Fat Lord about how the whole time the plan was to go over there and rob him, referring to VICTIM. Freeman then says he didn't know anything about that and they never talked about splitting it or anything like that. Freeman then says that Lil E and Fat Lord were supposed to go over there, rob him and bring WITNESS 4 back her gun. Freeman then talked about how WITNESS 4 told them that VICTIM was sitting "sweet" and how it was easy to rob him, VICTIM wasn't going to do nothing and VICTIM wasn't going to shoot his gun. Freeman then says he was sitting on someone's couch with somebody while Fat Lord was explaining the story and how WITNESS 4 "back doored that man" and how the whole time "he" back doored that man and he was acting like he had nothing to do with it. Capt. Krause asked who Freeman was refereeing to when he said "he" and Freeman says Fat Lord, WITNESS 2. Freeman then says that VICTIM called Fat Lord his twin and he'd been calling him that ever

since they knew of him, when Fat Lord was in prison. Freeman then said Fat Lord was crying on the phone like he has a guilty conscience and he's leaving out the fact that he had something to do with it and put it all on Freeman. Freeman said he didn't have any conversation with anyone about what they were going to go do or anything like that and he just rode with Lil E. Freeman says he just hopped in the car and took a ride.

17. During an interview on December 10, 2021 WITNESS 3 told Detective Hahn and Detective Henning that he (Eric/Lil E) said that he (VICTIM) "upped the gun on him" and then Eric shot VICTIM.
18. On January 7, 2022 Detective Hahn and Detective Henning met with WITNESS 6. WITNESS 6 confirmed with Detective Hahn that he knew who VICTIM was. Detective Hahn asked WITNESS 6 when he found out about VICTIM. WITNESS 6 said he found out that day when it was all over Facebook, which would have been the day after VICTIM was found deceased. Detective Hahn asked WITNESS 6 how he heard that Julius and Eric were involved with VICTIM's murder and he said word on the streets. Detective Hahn asked WITNESS 6 if he had talked to Eric Perry the day that VICTIM was killed. WITNESS 6 said that the day that VICTIM died he was with Eric over by Maplewood Commons Apartment Complex. WITNESS 6 said it was light out when he was over there hanging out with Eric so it was during the day. WITNESS 6 said that he and Eric hang out in the parking lot of the apartment complex, they don't hang out in anyone's apartment. WITNESS 6 said that he and Eric were hanging out and then Eric gave WITNESS 6 a ride to WITNESS 6's apartment. WITNESS 6 said that Eric dropped him off at his apartment at around 8-9pm. Detective Henning asked WITNESS 6 if Eric said where he was going that night and he said no. Detective Hahn asked WITNESS 6 if Eric called him that night and WITNESS 6 said that he never had Eric's phone number and Eric never had his number. WITNESS 6 said the only way he was in contact with Eric was via Facebook Messenger. Detective Hahn asked WITNESS 6 if there was any chance that WITNESS 6's phone number would be on Eric's phone records and he said there would be zero chance his number would be on there. Detective Hahn asked WITNESS 6 why someone would say that he spoke with Eric the night of VICTIM's murder. WITNESS 6 then said that he may have talked to Eric that night. WITNESS 6 then said that he did talk to Eric that night on Facebook Messenger, but Eric then deleted his Facebook page and Facebook Messenger. WITNESS 6 looked in his phone and confirmed that Eric Perry's Facebook page and Facebook Messenger was still deleted so WITNESS 6's Facebook Messenger messages were deleted. WITNESS 6 said that when Eric called him that night he said he "had a lick." Detective Henning confirmed with WITNESS 6 what Eric said about "hitting a lick," and WITNESS 6 confirmed that Eric told him that he was looking to "hit a lick." WITNESS 6 confirmed that Eric called him after he was dropped off on Berger Pkwy. Detective Henning knows through his training and experience that "hitting a lick" is street slang for getting money fast, which usually means robbing someone.
19. On February 24, 2022 at approximately 12:13 PM Detective Hahn and Detective Henning met with WITNESS 7 at her residence, Division St. in the City of Fond du Lac, in reference to this investigation. Based on a previous interview with WITNESS 7, Detective Hahn was aware that at the time VICTIM's death, Julius Freeman was living with WITNESS 7 at Division St. Detective Hahn asked WITNESS 7 if there were any conversations between her and "Tank", Julius Freeman, pertaining to specifics of what happened that night. WITNESS 7 asked, "like what" and Detective Hahn stated with him and Lil E. Detective Henning brought up a message from her to Freeman where she asked him about the pants that he bleached the blood off of. Detective Hahn asked when and how the blood got on Freeman's pants and WITNESS 7 said Freeman told her when he heard the shot, then she stopped and said Freeman basically said the blood splattered onto his pants. WITNESS 7 then said that Freeman told her that Lil E shot him in the head, but she didn't know if that was true or not because she didn't know if VICTIM had been shot in the head. Detective Hahn asked when this conversation happened with Freeman and WITNESS 7 said it was the following day after she got home from work around 11 o'clock. Detective Hahn then asked WITNESS 7 to start at the beginning of all that and start at the beginning of the conversation between her and Freeman. WITNESS 7 explained that Freeman picked her up from work and asked how her day was and they talked about her work day. WITNESS 7 said when they got home Freeman asked to talk to her and brought up the blood that he bleached off. WITNESS 7 said she asked him what about it and at that time Freeman told her it was VICTIM's blood. WITNESS 7 said she asked Freeman how it got on him and he told her it splattered on him. WITNESS 7 went on to say that Freeman told her that Lil E shot VICTIM in the head. WITNESS 7 said that Freeman was saying that it wasn't supposed to be that way and it was supposed to be Lil E going to get WITNESS 4's gun from VICTIM. WITNESS 7 said she asked Freeman why Lil E shot VICTIM in the head and Freeman said he didn't

know, but it was probably for Lil E to "show out". They talked more about Lil E shooting VICTIM for no reason and then Freeman went out of the room to the couch, where he was sleeping at that time. WITNESS 7 said after Freeman went out to the couch, she stayed in bed and could hear him mumbling something and watching TV and she fell asleep. Detective Hahn asked what was going through her mind when Freeman told her this and WITNESS 7's response was, "a lot". Detective Hahn then asked if Freeman said where this happened and WITNESS 7 said he told her it happened in some crack house. Detective Hahn asked where in the house and WITNESS 7 said she thought he said in the living room. WITNESS 7 went on to say that Freeman said he was in the kitchen and when he heard the first shot he was in the kitchen and he came out to see what was going on. WITNESS 7 then explained that Freeman thought the two of them, Lil E and VICTIM, were fighting at first and then he heard the gunshot go off, but then he saw VICTIM falling backwards from the shot in his head. WITNESS 7 said she didn't know if that part is true or not. Detective Hahn then clarified with WITNESS 7 that according to what Freeman told her, he didn't see Lil E shoot him, VICTIM. Detective Hahn then confirmed with WITNESS 7 that Freeman told her that he heard the shot and by the time he came in he saw VICTIM falling. Detective Hahn then asked WITNESS 7 if Freeman said anything else about what VICTIM was wearing and WITNESS 7 said she didn't know that. Detective Hahn then asked if Freeman said how Lil E shot VICTIM and WITNESS 7 explained that Freeman just said Lil E shot him in the head. Detective Hahn then asked WITNESS 7 if Freeman said anything about how many shots there were and WITNESS 7 said Freeman told her he heard one shot and that's when he went in there. Detective Hahn asked what Freeman said happened next and WITNESS 7 said Freeman told her that Lil E checked VICTIM's pockets and she didn't know if he grabbed WITNESS 4's gun or not. Detective Hahn asked WITNESS 7 if Freeman said anything about which pockets of VICTIM's that Lil E checked and she said she didn't know that. Detective Henning asked if there was anything else that Freeman said about that incident and WITNESS 7 said Freeman just kept repeating to himself that it wasn't supposed to go down like that. Detective Hahn then asked WITNESS 7 when Freeman washed the blood off the pants and WITNESS 7 said it was, "that night". Detective Hahn then clarified with WITNESS 7 it was the night when he came back with Lil E. WITNESS 7 went on to say that when she went into the room Freeman came in with bleach and poured it on the spots. WITNESS 7 said she didn't know where those pants were now. WITNESS 7 then confirmed it was the next night when Freeman told her about everything. WITNESS 7 said when he told her all of this she didn't know how to handle herself because she had a friend who committed suicide like that. Detective Hahn asked WITNESS 7 if that night, when Freeman bleached the pants, she knew VICTIM was dead and WITNESS 7 said she didn't know. WITNESS 7 went on to say that when she saw Lil E wiping the gun down she figured something went down, but she didn't question anything because that's not her place.

20. On Saturday morning, March 5, 2022 Detective Mikulec stopped by Meadowview Drive in Fond du Lac, this is the home of WITNESS 8 where Freeman had previously been living. In the days prior to March 5, 2022, Detective Hahn told Detective Mikulec that he had spoken to the girlfriend, WITNESS 7, of Julius Freeman. She had given more information to Hahn that apparently, Julius had blood on his pants and poured bleach on the pants to apparently kill the DNA.
21. Detective Hahn and Detective Mikulec were last at WITNESS 8's house on December 3, 2021. Detective Mikulec called WITNESS 8 to see if she still had the clothes for Julius or if she had gotten rid of them. She told Detective Mikulec that the bedroom was cleaned out but, she put all of the clothes for Julius in a closet. She said she was available Saturday morning at about 9:30 AM if Detective Mikulec wanted to stop by and take any of the items.
22. Detective Mikulec went to the house Detective Mikulec took all the pants out of the closet. There were 19 pair of jeans, several pair of distressed jeans, which looked like they were bleached. And, there were about a dozen pair of sweatpants.
23. As Detective Mikulec looked at the distressed jeans, Detective Mikulec turned the pants leg inside out. The shape on the outside of the pants matched the inside shape. There was no wicking of fabric. However, on one pair of pants, a pair of Rock Revival, size 38, there was a wicking on the material that Detective Mikulec did not see on any other pair of pants. There was the bright, distressed area, then a dirty brown area, then the natural color of the fabric. These pair of pants appeared to have not been distressed at the manufacture. Then, in looking on the pants leg, Detective Mikulec saw about a dozen red stains in a line on the outside of the left leg, near the ankle. The spatter was about 3-4" in length. The pants were packaged and Detective Mikulec requested they be sent to the Crime Lab in Madison as evidence Item 259.

24. On Monday, April 18, 2022 Detective Mikulec spoke with DNA Analyst Bart Naugle in regards to the submission of the jeans. Bart indicated he did prepare a report which was written on March 28, 2022, report 11. Detective Mikulec had not seen the report as yet so Bart e-mailed Detective Mikulec a copy of the report. The report is five pages in length. On page one, Bart identifies the jeans he processed as item AU. Their item AU is Fond du Lac Police Department Item 259. Bart references AU1 and AU2. AU1 is a cutting from the jeans (item 259) where the red stain was located. The sample indicated that the DNA was a mixture of two persons, including at least one male. The DNA profile indicated that there was a major male contributor and that VICTIM is the "source" of that DNA. The report also indicated the minor DNA component was not suitable for comparisons due to the limited DNA material. Bart then goes on in the report to indicate he took a second cutting from the jeans (item 259). This second cutting is sub-designated AU2. This was also a two-person mixture. This profile was from two males. VICTIM is the "source" of the major male contributor. Again, the minor profile was not suitable for comparisons because of the limited genetic information.
25. Based on the forgoing, Detective Hahn is referring charges of : 940.01(1)(a) 1st-Degree Intentional Homicide/939.05 Party to a Crime and 943.32(2) Armed Robbery/939.05 Party to a Crime to the Fond du Lac County District Attorney Office for Eric Perry and Julius Freeman. Eric Perry and Julius Freeman did, as Party to a Crime cause the death of VICTIM by an action with the Intent to kill VICTIM. Eric Perry and Julius Freeman did, as Party to a Crime, commit an Armed Robbery by intentionally taking and carrying away the property of VICTIM to wit, cash and Glock Model 30SF 45 caliber pistol with Serial Number BSRT006, valued at \$629.99 with the intent to steal said property and acted with force against VICTIM . Eric Perry and Julius Freeman did, as Party to a Crime, use a dangerous weapon, to wit a firearm.
26. PERRY was convicted of a felony in 20CF407 on 6/7/21. FREEMAN was convicted of a felony in 18CF403 on 4/10/19

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

Subscribed and sworn to before me on 07/01/22

Electronically Signed By:

Catherine Block

Assistant District Attorney

State Bar #: 1053966

Electronically Signed By:

Detective Vance Henning

Complainant