
STATE OF WISCONSIN**-vs-****JAMES CLIFFORD KOEPP
3315 HWY. 51 S. LOT 69
JANESVILLE, WI 53546
DOB: 01/29/1959
SEX/RACE: M/W
EYE COLOR: HAZEL
HAIR COLOR: BROWN
HEIGHT: 5 FT 7 IN
WEIGHT: 165 LBS****Plaintiff,****DA Case No.: 2007RO000400
Assigned DA: David J. O'Leary
Agency Case No.: LSO 07-143
Court Case No.: 08CF
ATN: 54000701170156****CRIMINAL COMPLAINT****Defendant.**

_____, being first duly sworn, states that:

Count 1: FIRST DEGREE INTENTIONAL HOMICIDE

The above-named defendant on or about Thursday, January 11, 2007, in the Town of Rock, Rock County, Wisconsin, did cause the death of Danyetta G. Lentz, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a) Wis. Stats., a Class A Felony, and upon conviction shall be sentenced to imprisonment for life.

Count 2: FIRST DEGREE INTENTIONAL HOMICIDE

The above-named defendant on or about Thursday, January 11, 2007, in the Town of Rock, Rock County, Wisconsin, did cause the death of Nicole R. Lentz, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a) Wis. Stats., a Class A Felony, and upon conviction shall be sentenced to imprisonment for life.

Count 3: FIRST DEGREE INTENTIONAL HOMICIDE

The above-named defendant on or about Thursday, January 11, 2007, in the Town of Rock, Rock County, Wisconsin, did cause the death of Scott L. Lentz, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a) Wis. Stats., a Class A Felony, and upon conviction shall be sentenced to imprisonment for life.

PROBABLE CAUSE:

Deputy Schmitt reports that he was dispatched to Jacobs Mobile Home Park, 3315 South US Hwy. 51, Lot 37, in Rock Township, Rock County, Wisconsin, on January 12, 2007, at 9:34 a.m., regarding three subjects down in a mobile home. Upon arrival at the scene, Dep. Schmitt opened the door and immediately noted a white female, subsequently

identified as Nicole R. Lentz, DOB: 1/5/90, lying on her back with blood stains on her torso. Nicole's face was bluish and there appeared to be markings around her neck. Dep. Schmitt noticed a black-handled steak knife with a bent blade to the right of Nicole's body and a black knife handle to the left. To the right of the door, Dep. Schmitt saw the body of a white male, subsequently identified as Scott L. Lentz, DOB: 2/8/92, and saw a large knife embedded in his chest and a pool of blood around the body. Dep. Schmitt next found an adult white female, subsequently identified as Danyetta G. Lentz, DOB: 11/18/68, in the hallway leading to the back of the trailer, naked from the waist up and there appeared to be 10-12 puncture wounds on her left side and chest. Fire personnel advised that all victims were deceased.

Sgt. Selby spoke with Linda Brickson, who worked with Danyetta at Community Action Daycare in Janesville. Linda reports that she became concerned when Danyetta did not show up for work at 8:30 a.m., on 1/12/07. Linda called Parker High School and found that the children were not in school, so she went to their trailer and knocked on the door and when no one answered, she called Russell Lucht.

Sgt. Selby spoke with Russell Lucht, who is the father of Danyetta and the grandfather of Nicole and Scott Lentz. Russell went to the trailer and saw a light on and his daughter's car in the driveway. Russell entered the trailer through a window and found the bodies of Danyetta, Nicole and Scott and immediately called 911.

Det. Yoerger spoke with James Warner, who stated that he was Nicole's boyfriend and that he last spoke to Nicole on Thursday evening by phone at approximately 7:30 p.m., until approximately 7:45 p.m., when James had to leave for his driver's education class. James advised that he attempted to call Nicole after his class at approximately 9:30 p.m., numerous times; however, no one answered the phone. James advised that while talking with Nicole that he heard a male voice in the background and Nicole told him that "Jim" was there. Warner said that Nicole specifically said that Jim was the guy who fixed Nicole's window. Warner said he did not know Jim but knows he lives in the trailer park.

Det. Strouse reports that he attended the autopsies for all three victims, which were all performed by Dr. Stier. Det. Strouse noted a total of 23 stab wounds to Danyetta, and Dr. Stier believed that 15 of the wounds were most likely post-mortem. Det. Strouse also noted a ligature around Danyetta's neck. Dr. Stier concluded that strangulation was the apparent cause of death; however, several of the stab wounds were also capable of causing Danyetta's death.

During the autopsy of Scott Lentz, Det. Strouse noted 5 wounds to Scott's chest and one wound to Scott's back. Dr. Stier indicated that strangulation principally caused Scott's death, but a combination of stab wounds to the left side of his chest could have also contributed.

During the autopsy of Nicole Lentz, Det. Strouse noted 4 wounds in the right portion of Nicole's back and a ligature furrow running along the left side of Nicole's neck. Dr. Stier concluded that Nicole died from strangulation and from lethal knife wounds. Dr. Stier concluded that all three deaths were the result of complex homicidal violence.

Det. Kamholz spoke with the defendant, James C. Koeppe, DOB: 1/29/59, on 01/15/07, who admitted that he fixed the broken window in Nicole's room 1 to 2 months prior to their deaths and claimed that was the last time he was in their trailer. The defendant denied being at the victims' trailer on Thursday evening, 1/11/07, and denied killing them. The defendant admitted drinking every night and that there were times he drank so much he didn't remember what he did while drinking. The defendant stated he was babysitting his wife's grandkids until about 5:30 p.m., on 1/11/07. The defendant claimed he watched TV in his trailer until approximately 10:30 p.m., and that he then drove to Quick Trip to pick up a lighter. The defendant stated he then went home and went to bed. The defendant gave Det. Kamholz the jeans and a jean shirt that he was wearing on 1/11/07, and Det. Kamholz noted some brownish-red stains on both the pants and the shirt.

Det. Goth spoke with Robert Himes, the defendant's step-son, who stated that he spoke with the defendant on 1/16/07 and that the defendant was acting unusual, was agitated and wasted, and wanted Himes to tell the defendant's wife goodbye, that Tennessee was nice this time of year, and he didn't think he would make it all the way to Mexico. The defendant told Himes that the defendant was running and needed to take off because the police had come over and gotten clothes from him and asked him to give a statement and was certain he was going to be arrested. The defendant also told Himes that the defendant could not remember everything that happened that night.

Det. Kamholz interviewed the defendant on 1/17/07, and the defendant initially denied going to the victims' trailer on 1/11/07. The defendant subsequently claimed that he had an affair with Danyetta; however, he still denied going over to the trailer on 1/11/07. The defendant finally admitted, "I might have been over there because I know I did want to talk to her." The defendant admitted that Danyetta, Nicole and Scott were at the trailer, and he claimed he just sat on the edge of the couch and talked with Danyetta in the living room. The defendant admitted Nicole was talking on the phone while he was there. The defendant estimated he was at the trailer between 6 and 7 p.m. The defendant stated he wanted to talk with Danyetta about their affair because he was uncomfortable in his own skin and had that guilt thing going on. The defendant admitted he was drinking beer that evening and took several cans with him. Det. Kamholz examined the defendant for injuries and noticed a small cut or scratch on the top of the defendant's head, some small cuts and abrasions on both the defendant's hands and wrists, several small cuts and scratches on the front of the defendant's lower legs and a baseball size bruise on the inside of the defendant's left knee.

According to the report from Wisconsin State Crime Laboratory DNA Analyst Daniel Campbell, the defendant's blue jeans and blue denim shirt were analyzed and bloodstains were located on both the jeans and the shirt. Campbell concludes that Danyetta Lentz is the source of the bloodstain from the left knee area of the defendant's jeans. Campbell concludes that Danyetta is included as the possible source of the bloodstain from the lower right leg of the defendant's jeans and the probability of randomly selecting an unrelated individual that would be included as a possible source is approximately 1 in 38 billion individuals. Campbell concludes that the blood stain from the front of the defendant's shirt is consistent with being a mixture of DNA from at least four individuals and that Danyetta, Scott and Nicole Lentz and the defendant are all included as possible contributors and the probability of randomly selecting an unrelated individual that would be included as a possible source of the DNA mixture is approximately 1 in 5 thousand individuals.

According to Daniel Campbell, a necktie forwarded from the homicide scene was examined and a chemical analysis indicated the presence of Danyetta's blood on the tie. The ends of the tie were tested for DNA, and the autosomal DNA profile obtained from the narrow end of the tie is consistent with being a mixture of at least 3 individuals, and Danyetta, Scott and Nicole Lentz and the defendant are consistent with being possible contributors to this DNA mixture. The DNA from both the wide-end and the narrow-end of the tie were further analyzed with Y-STR analysis and Campbell concludes the DNA is consistent with being mixtures of DNA from more than one male individual and Scott Lentz and the defendant are consistent with being possible contributors of both Y-STR mixtures. Campbell concludes that the probability of randomly selecting an unrelated individual that could possibly be a contributor to the DNA mixture at the narrow-end of the tie is approximately 1 person in 709 thousand individuals.

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

Complainant

Subscribed and sworn to before me
this _____ day of January, 2008.

Asst. D.A./Judge/Court Commissioner

Approved for filing _____ District Attorney
David J. O'Leary

I find probable cause (exists) (does not exist) that the crime was committed by the defendant and order that he/she be (held to answer hereto)(released forthwith).

Dated this _____ day of January, 2008.

Judge/Court Commissioner

djo/rsg