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**STATE OF WISCONSIN****-vs-****JEREMY ALLEN BROWN  
260 OXMOOR RD.  
HOMEWOOD, AL  
DOB: 01/06/1983  
SEX/RACE: M/W  
EYE COLOR: BROWN  
HAIR COLOR: BROWN  
HEIGHT: 5 FT 11 IN  
WEIGHT: 165 LBS****Plaintiff, DA Case No.: 2007RO007706  
Assigned DA/ADA: Scott H. Dirks  
Agency Case No.: LJV 07-18289****Court Case No.: 2007CF\_\_\_\_\_****CRIMINAL COMPLAINT****Defendant.**

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\_\_\_\_\_, of the Rock County Sheriff's Department, being first duly sworn, states that:

**Count 1: BURGLARY OF A BUILDING OR DWELLING**

The above-named defendant on or about Saturday, November 03, 2007, in the City of Janesville, Rock County, Wisconsin, did intentionally enter a building, without the consent of the person in lawful possession of the place, and with intent to commit a felony, , contrary to sec. 943.10(1m)(a), 939.50(3)(f) 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.

**Count 2: FELONY CRIMINAL DAMAGE TO PROPERTY**

The above-named defendant on or about Saturday, November 03, 2007, in the City of Janesville, Rock County, Wisconsin, did intentionally cause damage to the physical property of another, a club, belonging to Jeffery M. Jones, without that person's consent, whereby said property was reduced in value by more than \$2,500, contrary to sec. 943.01(2)(d), 939.50(3)(i) Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

**Count 3: MISDEMEANOR THEFT**

The above-named defendant on or about Saturday, November 03, 2007, in the City of Janesville, Rock County, Wisconsin, did intentionally take and carry away the movable property of Jeffery M. Jones, without consent and with intent to permanently deprive the owner of possession of the property, contrary to sec. 943.20(1)(a)&(3)(a), 939.51(3)(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.

**PROBABLE CAUSE:**

Officer Vaughn of the City of Janesville Police Department reports that shortly before 5 o'clock on the morning of November 3, 2007, he was dispatched to the area of 20 North Main Street, in the City of Janesville, Rock County, Wisconsin, regarding a building on fire at that location. Upon arrival, he observed that the building located at 22 North Main Street in Janesville was on fire and that firefighters were attempting to put the fire out. Officer Vaughn reports that he observed a firefighter walking down a set of back fire stairs from the second level of the building with a white male subject wearing a light gray colored hooded sweatshirt and blue jeans who identified himself with an Alabama driver's license as Jeremy Brown. Officer Vaughn reports that in making contact with defendant Jeremy Brown he observed that the defendant's clothes were covered with black soot and that there were wet marks on the front of his shirt and some type of reddish brown substance on the top of his shoes. The defendant stated that he had begun drinking at Quotes Bar at 9 o'clock that evening and stayed until the bar closed at around 2:30 and that he had gone inside the building which was on fire looking for a bathroom. Officer Vaughn reports that because it was cold out and the defendant was wet he asked the defendant to have a seat in his squad car and that prior to doing so the defendant gave Officer Vaughn consent to go through the defendant's pockets. Officer Vaughn reports that in one of the defendant's pants pockets was an antique padlock and key later identified by a member of the International Organization of Odd Fellows as belonging to the Odd Fellows Club which was in the building which had caught fire.

Detective Mark Johnson of the Janesville Police Department reports that on the morning of November 3, 2007, he made contact with a person who identified himself as Howard Branzell who stated that he lives at 23 North Main Street directly across the street from the building which caught fire. Mr. Branzell stated that he had been working on his computer when he heard some banging and breaking noises outside on the street. Mr. Branzell stated that he looked outside and saw a white male approximately 5 feet 10 inches tall wearing a gray sweatshirt or T-shirt and that he appeared to be throwing bottles at a vehicle parked on Main Street in front of 22 North Main Street. Mr. Branzell stated that he then saw this person go back to the door which leads upstairs to the Odd Fellows Lodge at 22 North Main Street and that a short time later he saw that person come back down and begin throwing beer cans and bottles at the same vehicle. Mr. Branzell stated that he then saw this person go back into the door leading up to the Odd Fellows Lodge and that one or two minutes later he observed smoke and flame coming from the large bay window area in the Odd Fellows Lodge on the second floor of 22 North Main Street.

Detective Johnson reports that later on the morning of November 3, 2007, he went into the Odd Fellows Lodge at 22 North Main Street with Fire Inspector Larry Hainstock to investigate the scene. Detective Johnson reports that in going through the various rooms of the Odd Fellows Lodge which include a kitchen area and a bar area it appeared that someone had pulled the contents of all drawers and shelves out and thrown them on the floor and against the wall, breaking dishes, breaking containers and bottles of food and that there was also fire extinguisher powder all over IOOF Lodge, including arrears where there had evidently been no fire. Detective Johnson reports that there was a tremendous amount of vandalism and damage that did not appear to have any association with the fire, which was in the front room area of the lodge. Detective Johnson reports that throughout

the IOOF Lodge there was a distinctive set of footprints that were not consistent with any of the foot gear worn by firefighters or by Detective Johnson and that it was later determined that those prints matched the imprints left by the shoes worn by defendant Jeremy Brown at the time of his arrest on the morning November 3, 2007. Detective Johnson reports that in speaking with Mr. Hainstock it was determined that at least \$5,000 worth of non fire related damage had occurred in the IOOF Lodge because of broken property and the associated clean up.

Detective Altstadt of the Janesville Police Department reports that on the morning of November 3, 2007, he interviewed a person identifying himself as defendant Jeremy A. Brown who stated that he was a long haul truck driver and that at approximately 8 o'clock that evening he had pulled his truck into TA gas station on Highway 14 in Janesville and then asked around for a place where he could go out drinking. The defendant stated that he took a taxi to the North Main Street area of Janesville arriving approximately 10:45 and that he was drinking at Quotes Bar as well as two other bars downtown until the bars closed at approximately 2:30. The defendant stated that he tried to get a ride back to his truck but that nobody would help him do so. The defendant stated that he had to urinate and that he did not want to do so in the street so he went up a set of stairs into a set of rooms where he believes he found a bathroom. The defendant claimed that he has no knowledge of what happened for the next two to two and half hours and that the next thing that he remembered was being by a door and that there was a fire and that the fire department confronted him and turned him over to police officers. The defendant stated that he is not sure what happened that maybe he did damage and set the fire and maybe he didn't.

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

\_\_\_\_\_  
Complainant

Subscribed and sworn to before me  
this \_\_\_\_\_ day of November, 2007.

\_\_\_\_\_  
Asst. D.A./Judge/Court Commissioner

Approved for filing \_\_\_\_\_ Assistant District Attorney  
Scott H. Dirks

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 November, 2007.

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Judge/Court Commissioner

SHD/jj