

STATE OF WISCONSIN

CIRCUIT COURT
BRANCH _____

DANE COUNTY

CITY OF MADISON
210 Martin Luther King Jr. Blvd. #401
Madison WI 53703

Plaintiff,
v. **COMPLAINT**

HIGHLANDER OF MADISON, INC.
4353 W. Beltline Highway
Madison, WI 53711

Case Classification: Other Injunction or
Restraining Order

And

Case Code: 30704

YI CHANG WANG
4353 W. Beltline Highway
Madison, WI 53711

Defendants.

Plaintiff, City of Madison, by its attorneys, City Attorney Michael P. May, and Assistant City Attorney Jennifer Zilavy, as a cause of action against the above-named Defendant, by complaining witness, Police Captain Jay Lengfeld, allege and show the Court, pursuant to Sections 823.113(1) and 823.02, Wisconsin Statutes, as follows:

1. Plaintiff, City of Madison, at all times stated in this complaint, was and is a Municipal Corporation duly organized and existing under the laws of the State of Wisconsin, and is located in Dane County, with offices located at 210 Martin Luther King Jr. Boulevard, Madison.

2. Your complainant, Jay Lengfeld, is a Police Captain with the City of Madison Police Department, 211 South Carroll Street, Madison, Wisconsin, and bases this complaint on personal knowledge and information and belief. Your complainant has been the Captain of the West Police District since January 2007.

3. 4353 W. Beltline Highway is located in the West Police District.

4. On information and belief, Defendant, Highlander of Madison, Inc., is a domestic corporation organized under the laws of the State of Wisconsin and doing business as the Highlander Motor Inn, a motel offering short-term and long-term residential room rentals at 4353 W. Beltline Highway, Madison, WI.

5. On Information and belief, Yi Chang Wang is the registered agent for Highlander of Madison, Inc.

6. On information and belief, Defendant, Yi Chang Wang, is an adult resident of the State of Wisconsin with his last known place of residence at 4353 W. Beltline Highway, City of Madison, County of Dane, State of Wisconsin.

7. On information and belief, Yi Chang Wang, is, and at all times material to this action has been, the legal owner and operator of the Highlander Motor Inn located at 4353 W. Beltline Highway, City of Madison, County of Dane, State of Wisconsin, by virtue of a warranty deed of March 30, 2003, a certified copy of which is attached as Exhibit A.

8. On information and belief, the property located at 4353 W. Beltline Highway, Madison, Wisconsin, owned by Defendant Wang, is held out for tenancy to private individuals under lease terms.

9. On information and belief, certain activities have occurred and continue to occur on the property located at 4353 W. Beltline Highway, Madison, Wisconsin, including, but not limited to, the purchase, sale, and use of illegal drugs, loitering, disturbances, unlawful trespass by convicted drug users and sellers, prostitution, building code violations and a disproportionate number of calls for police services.

10. On information and belief, the Highlander Motel is a high drug, high crime property which has been the site of numerous fights, disturbances, short term traffic, drug problems and prostitution problems. The property is posted "no trespassing" throughout the parking lot and the property.

11. Defendant Wang has been made aware of such illegal activities and excessive police calls for service occurring at the Highlander by numerous written and verbal communications from the Madison Police Department and the Madison City Attorney's Office.

12. On information and belief, the motel building located at 4353 W. Beltline Highway, Madison, Wisconsin, has been and continues to be used to facilitate the manufacture, delivery and distribution of a controlled substance as defined in sections 961.01(6), (9) and (13), Wis. Stats, respectively, and is a building where those acts have taken place and continue to take place as more regularly described in paragraph 13 below.

13. Defendants, Highlander Of Madison, inc. and Yi Chang Wang have maintained a drug house within the meaning of Sec. 823.113, Wis. Stats., to wit:

a. On March 12, 2008, at approximately 2:00 p.m., Madison Police Officer Jason Ostrenga was in a position of advantage monitoring The Highlander Motel due to illegal drug activity occurring at the motel. Officer Ostrenga observed a woman identified as Ogie A. Burford, DOB 3/1977, who he knew from past professional contacts, enter The Highlander. Officer Ostrenga made contact with Burford and asked her what she was doing at The Highlander. Burford said she was visiting a friend but did not know that friend's name. Buford walked out of the hotel and Officer Ostrenga followed.

Officer Ostrenga asked Buford if she had anything illegal on her and she raised her hands in the air and said, "go ahead, you can check." Officer Ostrenga confirmed with Burford that she was consenting to a search of her person and she again stated he could search her. Officer Ostrenga searched her and found in her left front jacket pocket a napkin in which there were six Ziploc gem packs with a green leafy-like substance that Officer Ostrenga suspected was marijuana. Burford stated that she didn't think Officer Ostrenga was going to search her even though she gave him consent. Burford was cited for Casual Possession of Marijuana. Madison Police Case No. 2008-66412.

b. On May 20, 2008, at approximately 8:00 p.m., Madison Police Detective Kevin Linsmeier met with Confidential Informant ("CI") 1114 because CI 1114 said that he could purchase heroin from an individual he identified as "O.D.". Detective Linsmeier knows "OD" to be Odell Dobbs, DOB 3/1976. CI 1114 identified "OD" from a jail photo and said that he has received heroin from Dobbs in the past. Detective Linsmeier knows that Dobbs is a confirmed drug dealer in the Madison area and that he deals in heroin and crack cocaine. CI 1114 called Dobbs and Dobbs told the CI to come to The Highlander Motel, room 17, to purchase the heroin. Detective Linsmeier followed CI 1114 to the area of The Highlander. Detective Linsmeier watched CI 1114 walk to the Highlander and at approximately 5:37 p.m. Madison Police Sergeant Joey Skenandore watched CI 1114 enter The Highlander. CI 1114 exited The Highlander at approximately 5:49 p.m. Detective Linsmeier made contact with CI 1114 and CI 1114 turned over the heroin that he purchased in room 117 at The Highlander. CI 1114 told Detective Linsmeier that he purchased the heroin from a man who goes by the street name of "Preacher." Detective Linsmeier knows a heroin dealer who frequents The

Highlander whose name is Willie P. Davis, DOB 11/1963, and whose street name is "Preacher." The heroin was tested by Detective Linsmeier and tested positive for the presence of heroin. Detective Linsmeier also learned that "Preacher" sold cocaine to Undercover Officer 208 immediately after selling the heroin to CI 1114. Madison Police Case No. 2008-137048.

c. On February 12, 2009, at approximately 2:22 a.m., Madison Police Officer Jason Baumgart observed a suspicious individual near the BP gas station at 4501 Verona Road, Madison, WI. The BP gas station is immediately adjacent to The Highlander Motel. Officer Baumgart observed this individual leave the BP Station and walk quickly towards The Highlander. Officer Baumgart tried to make contact with the individual to find out why he was standing near a business that was closed at that late hour. Officer Baumgart drove to where the individual, later identified as Jonathan Stanley, DOB 2/1964, was walking and rolled down his window to talk to him. Officer Baumgart observed that Stanley appeared nervous and upon Officer Baumgart asking him for identification, Stanley turned and began to run toward the front of The Highlander. Officer Baumgart exited his squad and gave chase and commanded Stanley to stop. Stanley entered The Highlander and Officer Solon McGill, who had responded to the scene, ran into The Highlander after Stanley. Officer McGill chased Stanley through the motel and exited at the South entrance. By the time Officer Baumgart made it to the South entrance, Officer McGill was on top of Stanley. Officer McGill told Officer Baumgart that Stanley had discarded something at the front entrance to the Motel. Officer McGill told Officer Jeff Felt where he had seen Stanley duck down during the chase. A K-9 arrived on scene and he and Officer Felt searched the area. Officer Felt located three

individual clear plastic baggie corners tied off and containing an off-white chunky substance that resembled cocaine base. Officer Baumgart searched Stanley and found a clear plastic baggie corner tied in a knot inside Stanley's right-hand coat pocket. The baggie contained an off -white chunky substance that appeared to be cocaine base. The packaging was consistent with the three individual rocks that Officer Felt found. Officer Baumgart did not locate any tools consistent with using cocaine base. Due to the method in which the suspected cocaine base was packaged and the lack of tools for use, Officer Baumgart believed Stanley was selling the drug. The white-chunky substance in the baggie did test positive for cocaine base. Stanley was charged with Possession With Intent To Deliver Cocaine, Repeater and Resisting A Peace Officer. Madison Police Case No. 2009-42351.

d. On March 14, 2009, at approximately 1:06 p.m., Madison Police Officer Shane Olson was dispatched to The Highlander Motel reference a male subject who allegedly hanged himself. Upon arrival Officer Olson made contact with an individual identified as Rickey Carson, DOB 11/1966. Carson said that Richard Hull had hung himself. Officer Olson saw a subject, who appeared to be dead, lying in the hallway just outside of room 38. Carson said that Hull had come to him the night before and asked him for a place to lay his head down. Carson told Hull he could have his room. Carson told Officer Olson that he knows Hull deals crack cocaine and said that he bought a "dime bag" of crack from Hull prior to leaving the room. Around 7:00 a.m. the next morning, Carson knocked on the door to room 38, but there was no answer. At around 1:00 p.m. Carson went back to his room and again knocked on the door but there was no answer. Carson then decided to force the door open and when he did he found Hull

hanging from the closet bar. Carson cut Hull down and dragged his body into the hallway and called the police and an ambulance. Officer Olson observed the shoe strings that were twisted together and appeared to be what Hall used to hang himself on the closet rod. A search of Carson's room revealed a spoon with a powdery white residue that appeared consistent with crack cocaine or some other controlled substance and a shoe box with burnt pieces of Chore Boy as well as two pushrods. Officer Olson knows from his training and experience that Chore Boys and pushrods are commonly used to ingest crack cocaine. Madison Police Case No. 2009-72433.

e. On April 19, 2009, at approximately 7:51 p.m., Madison Police Sergeant David McClurg, members of the West Community Policing Team and Canine ("K9") Officer Rose Douglas and her Canine companion Marty, were conducting sniffs of the motel rooms at The Highlander due to ongoing information regarding illegal drug activity taking place at the Motel. K9 Marty showed indications on rooms 16 and 29. Sergeant McClurg and Officer Carren Corcoran knocked on the door of room 29. Rebecca Heft, DOB 9/1977, came to the door and when told that the dog "hit" on her door she admitted to smoking marijuana in her room that day. Heft consented to a search of her room and Sergeant McClurg found several small granules of marijuana and a homemade marijuana pipe. Sergeant McClurg and Officer Corcoran went to room 16 and knocked but there was no answer. Madison Police Case No. 09-110252.

f. On October 12, 2009, at approximately 1:40 a.m., Madison Police Officer Solon McGill was dispatched to The Highlander Motel reference a disturbance in room 15. Upon arrival, Officer McGill was met by the owner, Mr. Wang, who said he could hear a lot of banging and yelling coming from Room 15. Officer McGill made contact

with James Green, DOB 07/1973, the occupant of Room 15. Green allowed Officer McGill to enter his room. While in the room, Officer McGill observed a Chore Boy and a straightened out piece of metal with some burned substance on the end. Officer McGill recognized these items as paraphernalia commonly associated with using cocaine base. Officer McGill also observed torn off plastic baggie corners which are consistent with packaging that is most commonly used for the sale of cocaine base. Officer McGill also saw a can of butane fuel and a spoon with off-white residue that appeared to be consistent with heroin use. Green gave Officer McGill consent to look around the room Officer McGill found additional baggy corners. Due to the drug paraphernalia he observed, Officer McGill asked Green if he could search his person. Green agreed and Officer McGill found a pack of cigarettes that had a waxy off-white semi hard rock substance inside the pack which Officer McGill recognized through his training and experience as likely cocaine base. Green said that he had given a prostitute \$20 so she could buy herself heroin with the understanding she would come to his room for sex. Green said that she led him to another room where he purchased crack cocaine for his own use. Green was charged with Possession of Cocaine. Madison Police Case No. 2009-305045.

g. On October 13, 2009, at approximately 12:32 a.m., Madison Police Officer Solon McGill was dispatched to The Highlander Motel reference a man with a gun and that the man was in a green convertible. Upon arrival Officer McGill observed an agree convertible vehicle in The Highlander's parking lot. He approached the vehicle and made contact with the driver. The driver, later identified as Jonathan E. Williams, DOB 9/1978, was uncooperative and would not show his hands to Officer McGill. Williams eventually showed his hands and was ordered out of the vehicle at gunpoint.

While other officers were dealing with Williams, Officer McGill checked the area between William's seat and the center console for a gun. This was the area in which Williams' hand had been when he refused to show it. When Officer McGill looked down between the console and the seat he observed a small knotted plastic baggie corner with a white-ish waxy substance that he knows from his training and experience to be consistent with cocaine base. Other Officers on the scene informed Officer McGill that they did not find a weapon on Williams. Officer McGill then searched the vehicle. Officer McGill noted that the carpeting that covered part of the console came up easily and that the center console, as well as part of the dash, was held in place by Velcro. Officer McGill also noted that the interior of the center console area had air freshener in it. Officer McGill knows from his training and experience that the velcroed parts and the air freshener are methods used by those involved in the manufacture and distribution/delivery of controlled substances to conceal drugs in their vehicle to avoid detection. Williams' passenger, Patricia Rice, 9/1989, told Officer McGill that they were at The Highlander to give a female named Juanita a ride. Rice said that Williams went into the motel and was there for approximately 10 minutes before he came back out. The white-ish substance discovered by Officer McGill tested positive for the presence of Cocaine. Williams was cited for Possession of Cocaine. Williams has prior charges for Possession of Cocaine; Possession of Cocaine with Intent to Deliver and Possession of THC. Madison Police Case No. 2009-306002.

h. On December 1, 2009, at approximately 4:01 p.m., Madison Police Officer Edward Marshall was dispatched to The Highlander Motel for a pulse-less non-breather in Room 16. Upon arrival to Room 16, Officer Marshall observed a black male

holding the head of an older black female, later identified as Marguerite Evans, DOB 6/1968, who appeared to be unconscious. Officer Marshall had received information from a reliable source that Evans was currently using narcotics, such as heroin, and may also be selling heroin to persons in the area. Officer Marshall observed what appeared to be a small puncture wound on Evans' left wrist. In addition to several different prescription bottles with various medications in them, Officer Marshall also found a zip-lock type baggie with small cotton balls in it. Officer Marshall knows from his training and experience that cotton balls are sometimes used in the consumption of heroin by intravenous injection. Persons who inject heroin intravenously will typically liquefy an amount of heroin and then draw the heroin in to a syringe or needle using a small cotton ball as a filter. Detective Greg Kamoske was on scene and brought a woman named Carlavette Lucas into Room 16. Lucas was the individual who reported the incident to dispatch. Lucas admitted to using heroin and said that she and Evans had consumed heroin in Room 16 together and that they were "tooting" it. "Tooting" is a slang term to refer to ingesting drugs in powder form by snorting them through the nose. Lucas said that Evans was about to prepare "premo", which is cocaine base in a cigarette form, when Evans fell over. Evans was transported to the hospital. Madison Police Case No. 09-355218.

i. On December 3, 2009, Madison Police Officer Andre Lewis was dispatched to The Highlander Motel reference a sexual assault investigation. Upon arrival, Officer Lewis made contact with a woman identified as Dawn Edwards, DOB 3/1969. Edwards said that she called Rickey Carson, who lives in Room 40 at The Highlander, because she wanted to use drugs. Carson told her to come over and she did.

The two talked and Carson said “things are slow today and ain’t shit goin’ on.” Edwards understood that to mean that no one was moving drugs through the motel that day.

Edwards told Carson that she had \$5 or \$6 and he told her to give him the money and he would go out and get some drugs. Carson went to Room 42, where Van Williams, DOB 8/1961, lives and Williams did not answer his door. Carson came back into Room 40 with a black female who handed Carson a rock after Carson gave her the \$6. Edwards then went to Room 42 and Williams told her that if she wanted some crack she would have to “suck his dick”. Edwards said she “sucked his dick” for about 15 minutes before she told him she was going to stop because he was being too forceful and treating her like a “crack ho.” Later that evening, Williams, Carson and Edwards were in Williams’s room when Carson left and then brought some crack back to the room. Carson told Edwards that if she got undressed he would give her a hit. Carson also told Edwards that she should go to “Bernie’s” room (room 31) and get him turned on so he would give her money. Carson accused Edwards of wanting the drugs but not wanting to do anything to get them. The three allegedly all had sex together and afterwards Edwards said she was in pain and Williams gave her another hit of crack thinking it would make the pain subside. Edwards told the police that Carson and Williams had sex with her without her consent. Edwards was transported to the hospital. Madison Police Case No. 09-357852.

j. On December 10, 2009, at approximately 8:36 p.m., Madison Police Officer Christopher Kobinsky responded to The Highlander Motel to investigate a tip the West District Community Policing Team had received regarding drug activity occurring in Room 40 of The Highlander. Officer Kobinsky knocked on the door to Room 40 and it was answered by an individual identified as Rick Carson, DOB 11/1966. Carson was

specifically mentioned in the tip as being involved in the drug activity. Carson said he did maintenance work around the motel and denied any involvement in illegal drug activity. Officer Kobinsky asked Carson if he could search his room and after Carson thought about it for a couple of minutes he gave his consent. During the room search, Madison Police Officer Josh Acker found a couple of razorblades, one of which had a white powdery substance on it, some Chore Boy and a sandwich baggie which also had a trace amount of white powdery substance. Officer Acker knows that these items are commonly used in the processing, packaging and ingesting of illegal drugs. Carson admitted that he occasionally “snorts” a little and that sometimes a friend will come over and smoke some crack. Madison Police Case No. 09-365850.

k. On December 20, 2009, at approximately 6:30 p.m., Madison Police Officer Edward Marshall was dispatched to The Highlander Motel reference a resident refusing to leave. Upon arrival, Officer Marshall spoke with the motel owner, Chang Wang. Wang said that he suspected the resident of Room 21, Shurniece Petty, was dealing drugs out of her room. Wang insisted that Officer Marshall search Petty’s room and evict her. Officer Marshall asked Petty if he could search her room. Petty granted Officer Marshall consent to enter the room and when he did he observed three other adults in the room as well as several children. Officer Marshall observed the room to be in a general state of disarray and decided not to search at that time given the state of the room and all the occupants. Officer Marshall advised Wang to consult the Landlord/Tenant Resource Center about the appropriate eviction process. Officer Marshall reported that Wang seemed very upset about the fact that the police could not evict Petty. Later that same night, Wang called Officer Marshall and told him he had a

friend or acquaintance who was willing to purchase drugs from Petty in order to obtain information so the police could get Petty out of the motel. Later in his shift, Officer Marshall was dispatched to The Highlander to make contact with Petty who was reporting being “harassed” by Wang. Petty said she had been staying at the motel for approximately three months. Wang said she was there only one to one and a half months. Wang advised that there had been several individuals under his roster for that same room and that they may be changing names or having the room change hands without updating Wang. Wang showed Officer Marshall several written agreements between him and Petty indicating that Petty owed a substantial amount for overdue rent and based upon that, it appeared that Petty was staying at the hotel longer than Wang initially stated.

Madison Police Case No. 2009-374588.

1. On January 27, 2010, at approximately 4:35 a.m., Madison Police Officer Solon McGill was patrolling the Verona Road frontage road near Atticus Way when he observed a light colored Ford Crown Victoria with license plate 896-MXZ. Officer McGill was aware that a similar vehicle had been reported as stolen recently. Officer McGill ultimately located the vehicle in the parking lot of The Highlander Motel. At that time, the vehicle was unoccupied and Officer McGill did not recognize the vehicle as being one that belonged to a resident of The Highlander. Officer McGill backed into a spot where he could see down the hallway of the Highlander. Officer McGill has observed a great deal of short-term traffic in which individuals he knows through past professional contacts to be regular users of cocaine base or crack cocaine approach the rooms closest to the door Officer McGill was now observing. Officer McGill has seen those individuals enter the room(s) for a short time before exiting again. Specifically,

Rooms 49 and 50. Officer McGill knows from his training an experience that this type of behavior, which is short term traffic, is consistent with the sale and delivery of illegal drugs. As Officer McGill was observing Rooms 49 and 50, at approximately 4:40 a.m., he observed a white male, later identified as David Zumwalt, DOB 12/58, exit Room 49 and walk out the door of the Highlander that was closest to Officer McGill. Zumwalt walked to his vehicle and Officer McGill approached him and made contact. Zumwalt sat down in the driver's side of the vehicle and Officer McGill told Zumwalt to keep his hands visible. Officer McGill then saw something drop near Zumwalt's foot. The item was two knotted plastic baggie corners with a white-ish substance inside that appeared to be cocaine base and was packaged in a manner in which cocaine base is usually packaged for sale. Officer McGill also discovered a torn off piece of Chore Boy in Zumwalt's hand. Officer McGill knows from his training and experience that Chore Boy is often used as a filter in pipes used for smoking cocaine base. Zumwalt admitted that he purchased the crack cocaine from Room 49 at the Highlander. Officer McGill tested the suspect cocaine base and it tested positive for the presence of cocaine. Madison Police Case No. 2010-23952.

m. On January 28, 2010, from approximately 3:00 p.m. to 7:00 p.m., Madison Police Officer David Wixom was conducting surveillance at The Highlander Motel due to the known illegal drug activity and prostitution occurring at the motel. During the course of his surveillance, Officer Wixom observed that the West door and the Southwest door were propped open and people were coming and going in and out of those doors without using a key. At one point, Officer Wixom saw the West door locked and an individual attempt to get in the West door. The individual then went around and went in

the front door of the motel and came around to the West door and propped it open again. Officer Wixom observed a white minivan pull into the north side of the BP gas station which is immediately adjacent to The Highlander. Officer Wixom then observed a black male come out of the Southwest doorway of The Highlander and get into the white minivan, which was still at the BP, and then exit approximately 10 seconds later. Officers contacted the driver of the white minivan who admitted that he does smoke cocaine but that he wasn't making a buy at this time, he was just paying a back debt from buying crack from the individual in the past. Madison Police Case No. 2010-25449.

n. On January 31, 2010, at approximately 12:31 a.m., Madison Police Officer Solon McGill was parked in a position to observe the parking lot of The Highlander Motel. Officer McGill observed numerous people coming and going in a manner that was consistent with short-term drug trafficking. Officer McGill knows that The Highlander is known for high volumes of short-term drug trafficking and he has made numerous arrests in and around the building for drug charges. Officer McGill had also received information from numerous individuals over recent weeks that there is an increasing amount of drug trafficking occurring at The Highlander. Officer McGill observed a tan Jeep Cherokee pull into The Highlander parking lot and remain running. Officer McGill did not recognize this vehicle as belonging to any residents of The Highlander. Officer McGill observed an individual, later identified as Timothy Markling, DOB 04/1956, exit the passenger seat of the vehicle and walk into The Highlander. Markling was inside The Highlander for approximately 1-1/2 minutes before walking back to his vehicle with a black male who was wearing a red Philly's baseball cap. During the early morning hours on 1/30/2010, Officer McGill had contacted two

individuals at the Highlander reference a similar incident. One of the individuals, identified as Tommy Collins, told Officer McGill that he had witnessed drug sales in the hallway on the East end of the Highlander and that the man in the Philly's hat was selling drugs when he saw him. An individual identified as Carlton McKinnis, a known crack cocaine user approached Markling's vehicle and got in the rear passenger seat. The black Male in the Philly's cap then approached the rear passenger seat where McKinnis was and opened the door. After a short time McKinnis exited the vehicle and the Jeep drove away. Officer McGill initiated a traffic stop on the Jeep and contacted the driver, identified as Jason Thomas. Thomas stated that they had been at the Highlander to pick up a girl who had called him but stated he did not know her real name. Thomas stated he did not know either McKinnis or the male in the Philly's cap and had no idea why they got in the vehicle and leaned in the vehicle. Officer McGill had both Thomas and Markling exit the vehicle and then observed on Markling's passenger seat, a small piece of white-ish semi-hard substance that appeared to Officer McGill to be consistent with cocaine base. Based on this finding, Officer McGill continued to search the vehicle and found more ground up and crumbled up pieces of what looked like cocaine base. Officer McGill also found a ripped off plastic baggie corner knotted in a manner that was consistent with the way cocaine base is normally packaged for sale. Thomas admitted to Officer McGill that Markling told him to go to the Highlander and that Markling most likely had purchased crack cocaine when they were at the Highlander. The white-ish substance tested positive for the presence of cocaine. Markling was charged with Possession Of Cocaine As a Repeater. Madison Police Case No. 2010-27591.

o. On February 1, 2010, at approximately 1:25 a.m., Madison Police Officer Solon McGill was on duty when he walked into The Highlander Motel. Officer McGill observed two males walking in the hallway of the motel. McGill thought that one of the males maybe lived at the motel. Officer McGill suspected that the males were involved in drug trafficking and waited out of view to see what room they went to. After walking back into the main hallway a few seconds later, Officer McGill saw the same two males walk back towards the main entrance. Officer McGill determined that the Hispanic male lived at the motel and the other male, identified as Samuel Warzyn, DOB 10/1987, said he was just stopping by to use the bathroom. The Hispanic male then went to his room and Officer McGill spoke with Warzyn. Warzyn told Officer McGill that he was at the motel to visit a friend by the name of Jesse in Room 45. Officer McGill knows that Room 45 is occupied by a Jesse Ferguson and Officer McGill has received information from numerous informants that Ferguson has been involved in the sale of cocaine base out of Room 45 and has also been involved in the sale of marijuana. Officer McGill asked Warzyn if he could search him and Warzyn consented and during the search Officer McGill found a clear, plastic sandwich baggy and inside of the clear plastic sandwich baggy were numerous small knotted plastic baggy corners containing a white-ish, semi-hard substance that appeared to Officer McGill to be cocaine base, commonly known as crack cocaine. Officer McGill knows from his training and experience that this is the manner in which cocaine base is normally packaged for individual sale and the large number of packages led Officer McGill to believe that Warzyn was involved in the sale of cocaine base rather than having it for personal use. There was a total of nineteen (19) individual rocks. During the search of Warzyn, Officer McGill also located four

cellular telephones and a small plastic baggy corner containing a green leafy substance that appeared to be marijuana. Warzyn admitted that the white-ish substance was cocaine and that the green leafy substance was marijuana. Warzyn admitted that he was planning on selling the cocaine. Warzyn told Officer McGill that he normally buys cocaine from a female he knows as "Passion" and that he does not know her real name. Warzyn stated that he purchases the cocaine from "Passion" at The Highlander. Warzyn also stated that he could buy cocaine from a male named "Blue" who stays at Room 34 at The Highlander. Warzyn stated that he has seen "Blue" selling crack cocaine at The Highlander. Officer McGill tested the suspect cocaine and the suspect marijuana. The suspect cocaine tested positive for the presence of cocaine and the suspect marijuana tested positive for the presence of THC. Warzyn was charged with Possession With Intent To Deliver Cocaine, Possession of Marijuana and Unlawful Trespass. Madison Police Case No. 2010-28375.

p. On February 2, 2010, at approximately 3:18 a.m., Madison Police Sergeant Lori Chalecki was clearing from a call at The Highlander Motel when she observed what she knows from her training and experience to be a crack pipe on the ground in the main hallway of the motel directly across from the registration desk. Sergeant Chalecki also observed that the crack pipe was burnt on both ends with only one end containing a substance consistent with that of burnt Chore Boy. Sergeant Chalecki knows from her training and experience that burnt Chore Boy is typically found in the end of a pipe used to smoke crack cocaine. Madison Police Case No. 2010-29274.

q. On February 21, 2010, at approximately 6:55 p.m., Madison Police Sergeant Lori Chalecki was working with the West District Community Policing Team in

the area of The Highlander Motel and the BP Gas Station. Madison Police Officer Bee Xiong observed a white Ford Taurus backed into a parking space in The Highlander parking lot with its headlights on. The suspect vehicle sat in that position for approximately ten minutes when an individual, later identified as Charles Condon, DOB 12/1977, exited the vehicle and entered The Highlander Motel. Moments later Condon exited the Highlander and re-entered the white Ford Taurus. Condon remained in the vehicle for a couple more minutes and then began to drive out of the parking lot. Officer Xiong reported that he observed a black female exit the Highlander and make contact with Condon while Condon remained in his vehicle. Sergeant Chalecki knows, based on her training and experience, that this behavior is consistent with short-term traffic associated with purchasing illegal drugs. Sergeant Chalecki made a traffic stop of Condon's vehicle and asked Condon where he was coming from. Condon stated, "work." Condon stated that he worked at East Towne Mall and that he was on his way home and had not stopped any place while on his way home. Sergeant Chalecki arrested Condon for Unlawful Trespass for being at The Highlander and searched him incident to arrest. Sergeant Chalecki located a baggie corner in the right coin pocket of Condon's pants. The baggie corner had a white powdery residue or film inside. The residue was consistent with what Sergeant Chalecki knows to be crack cocaine. Condon stated he did not know the baggie corner was in his pocket. Sergeant Chalecki asked Condon if she could search his vehicle and Condon stated "no." Officer James Donnell and his K9 Johnny arrived on the scene and Johnny indicated a positive alert on Condon's vehicle. Madison Police Officer Eric Vosburg searched the vehicle and located a crack pipe.

Condon was charged with Unlawful Trespass and Possession of Drug Paraphernalia.

Madison Police Case No. 2010-47823.

r. On February 22, 2010, at approximately 3:03 p.m., Dane County Narcotics and Gang Task Force Detective Sabrina Sims was working a drug investigation at The Highlander Motel based upon her previous observations of drug trafficking occurring as people would walk from the Highlander to the BP to sell people at the BP illegal drugs. Detective Sims met with Undercover Officer (“UC”) 211 and instructed UC 211 to go to the Highlander Motel to attempt to purchase drugs. At approximately 1:19 p.m., UC 211 pulled into the parking lot of the Highlander, parked the vehicle and entered the motel from the Southwest side. At approximately 1:42 p.m., a black male walked toward the South entrance door of the motel and UC 211 met up with this black male just inside the South door. At approximately 1:43 p.m., UC 211 exited the South door of the motel and returned to UC 211’s vehicle. Detective Sims followed UC 211 back to the Task Force office where UC 211 turned over five (5) knotted torn sandwich baggie corners which contained the suspect cocaine base. UC 211 purchased the suspect cocaine base for \$50. Detective Sims tested the suspect cocaine base and it tested positive for the presence of cocaine base. UC 211 reports that when he entered the Highlander on February 22, 2010, he stood inside the vestibule for a brief period before he was approached by a black male, later identified as Keandrew Thomas, DOB 3/1990. Thomas asked UC 211 who UC 211 was and who UC 211 was looking for and UC211 told Thomas UC 211 was interest in purchasing heroin. Thomas indicated he did not have heroin. UC 211 then asked Thomas if he had a “rock”, referring to crack cocaine. Thomas indicated to UC 211 that he did in face have crack cocaine and asked UC 211

how much money UC 211 had, to which UC 211 responded, “\$50”. Thomas then spit an unknown object into his hand and held his closed hand out to UC 211 and asked to see the money. UC 211 showed Thomas the \$50 and Thomas gave UC 211 the contents of his hand which was five small tied off baggie corners containing a small amount of what later tested positive for the presence of cocaine. After the transaction UC 211 watched Thomas walk down the hallway to Room 19. Madison Police Case No. 2010-48539.

s. On February 24, 2010, at approximately 2:50 p.m., Dane County Narcotics and Gang Task Force (“DCNGTF”) UC 211 was directed by DCNGTF Detective Sabrina Sims to make contact with Keandrew Thomas in Room 19 of the Highlander to attempt to purchase crack cocaine. UC 211 called the telephone number he had for Thomas while standing in the vestibule area of the Southwest entrance to the motel. UC 211 could clearly see down the hall to Room 19 from where UC 211 was standing. UC 211 briefly spoke with a male subject on the phone and told him UC 211 was waiting for him in the entryway. A few seconds after the conversation UC 211 saw the door to room 19 open and a black male, who UC 211 knows to be Keandrew Thomas, exit the room. Thomas approached UC 211 and held out his hand with three small tied off baggie corners each containing an off-white chunky substance that appeared to be crack cocaine. Thomas told UC 211 that he had “three dubs.” UC 211 knows from his training and experience that a “dub” is a slang term referring to a \$20 increment. UC 211 gave Thomas \$50 for the suspect crack cocaine and then left the motel. The suspect crack cocaine later tested positive for the presence of cocaine. Madison Police Case No. 2010-48539.

t. On Wednesday, February 24, 2010, Madison Police Undercover Officer (“UC”) 211 was directed by Dane County Narcotics and Gang Task Force Detective Sabrina Sims to make contact with Oscar Brand and Claudette Carter in Room 49 of the Highlander Motel and attempt to purchase crack cocaine from either Brand or Carter. At approximately 2:45 UC 211 arrived at the Highlander and walked to Room 49 and knocked on the door. A female voice asked UC 211 to identify him/herself and the door opened slightly to reveal Oscar Brand standing in the door opening. Brand invited UC 211 into the room and asked UC 211 what UC 211 was looking for. UC 211 told Brand that UC 211 had \$100 to spend and that UC 211 wanted to buy crack cocaine. Brand looked at Claudette, who produced a small amount of an off-white chunky substance that appeared to be crack cocaine from a purse. Brand showed UC 211 the crack cocaine and UC 211 asked Brand if he had a bag. Brand then got a clear plastic baggie from a nightstand and put the suspect crack cocaine in the corner of the baggie and twisted the rest of the baggie and tied a knot in it, cutting off the excess plastic. While Brand was packaging the suspect crack cocaine, a black male in the room told UC 211 he had some “good weed” and asked UC 211 if UC 211 wanted to buy some. UC 211 declined. Brand handed UC 211 the baggie corner containing the suspect crack cocaine and said that it was \$50 worth. Brand told UC 211 that was all he had left but said that if UC 211 wanted to wait, he could go retrieve more. UC 211 told Brand UC 211 was good for now and left Room 49. UC 211 met up with Detective Sims and gave her the suspect crack cocaine that UC 211 had purchased in Room 49. The suspect crack cocaine later tested positive for the presence of cocaine. Madison Police Case No. 2010-51335

u. On February 26, 2010, at approximately 11:30 a.m., Dane County Sheriff's Detective Joel Wagner was working with the US Marshal Service (USMS) Badgerland Fugitive Apprehension Squad (BFAS) to apprehend individuals wanted on felony warrants. Detective Wagner went to the Highlander Motel to conduct a follow-up interview with Olivia Thompson in Room 19. Thompson is a friend of Kevin Moore, who is wanted on a felony warrant. While knocking on Room 19's door, a female from Room 18 opened the door. Detective Wagner showed this female a photo of Kevin Moore and explained that he was looking for him. The female said that she had seen that person and that he was currently in Room 20. The female also stated that Room 16 was where Kevin Moore's mother, Marguerite Evans-Moore lived and that she had seen Kevin Moore in Room 16 as well as Room 20. Detective Wagner contacted the Highlander's owner, Chang Wang and asked him who had rented Room 20. Mr. Wang stated that Charneese Alexander had rented Room 20 and also had Room 33 rented. Mr. Wang stated that when Alexander rented Room 20, she said that they wanted absolutely "no housekeeping services while they were in the room." Mr. Wang opened the door to Room 20 and Detective Wagner and DUSM Michaelis entered the room. A man identified as Milton Moore, DOB 6/1990, Kevin Moore's brother, was in the room. A search of the room revealed a clear plastic baggie of a green leafy substance in the form of a "dime bag" that Milton Moore stated was his "weed", which he said was marijuana. DUSM Michaelis looked in a dresser drawer that was partially open and observed a clear plastic baggie with many small individually wrapped corner ends of baggies tied into knots inside of it. DUSM Michaelis pulled out the baggie and counted 30 small corner baggies inside the larger baggie. Each baggie knot had a white-ish substance in it that

appeared to be cocaine base. A further search of Room 20 revealed that nobody appeared to actually be living in the room as there was no clothing or other personal use items in the room. The suspect cocaine base tested positive for the presence of cocaine and the suspect marijuana tested positive for the presence of THC. Madison Police Case No. 2010-52311.

v. On March 1, 2010, at approximately 3:18 p.m. the Dane County Narcotics and Gang Task Force along with ATF and Madison Police Department West district personnel executed a search warrant at the Highlander Motel, Room 19. The search warrant came as a result of undercover officer purchases of cocaine base from the resident of Room 19, Keandrew Thomas, on February 22 and February 24, 2010. Execution of the search warrant yielded cell phones, a roach containing suspected THC, 1 Ecstasy pill, 1 baggie corner and \$491 in US currency. Madison Police Case No. 2010-48539.

w. On March 1, 2010, members of the Dane County Narcotics and Gang Task Force along with the ATF, Madison Police Department and West Community Policing Team, executed a search warrant at Room 49 of the Highlander Motel. The search warrant was a result of an undercover crack cocaine buy that took place in Room 49 on February 24, 2010, by Madison Police Department Undercover Officer 211. Execution of the search warrant yielded the following: plastic baggie containing 1.3 grams of green leafy substance, a glass crack pipe and 1 small Ziploc baggie containing 16 1" x ½" gem packs; 9 sandwich baggies with corners missing and 1 baggie corner; a box containing 70 8 mm 31 gauge syringes; a glass crack pipe with Chore Boy on one end; 2 straws; a small crack pipe with Chore Boy in it; "Top" rolling papers, several cell phones; silver cylinder

containing 2 off-white rock type substances; plastic baggie containing brownish-type substance; 2 prescription bottles with the name "Claudette Carter"—1 dated 1/19/2010 for Oxycontin 10 mg tablet quantity 90 pills and 1 dated 2/17/2010 for Hydrocodone-apap, 5-500 tablet quantity 120 tablets; 3 lidocaine 5% patches; a bundle of Chore Boy. Madison Police Case No. 2010-51335.

x. On March 16, 2010, Dane County Narcotics and Gang Task Force Undercover Officer UC 212 was assigned to purchase heroin from Melvin Thompson, aka "Pharo", DOB 5/1978. UC 212 called Thompson's number and spoke with a male who identified himself to UC 212 as Pharo. Thompson advised that he had to go "take care" of someone else before he could meet up with UC 212 but said he would call UC 212 right back. Thompson called UC 212 back several more times and continued to put UC 212 off, saying he would call back in 10 or 15 minutes. At approximately 12:57 p.m., Thompson called UC 212 and said he was on his way to the West side and that UC 212 could meet him at the Highlander Motel, Room 45, where a friend of his was staying. UC 212 arrived at the Highlander at approximately 1:25 p.m.. Thompson called UC 212 at approximately 1:42 p.m. saying he was in Room 45 and told UC 212 to come to the room. UC 212 headed to Room 45 and Thompson answered the door and invited UC 212 in. UC 212 observed Thompson holding a bag of a chunky off-white substance that UC 212 immediately recognized as suspect crack cocaine. UC 212 asked Thompson if he had UC 212's heroin and he said that he did, however, Thompson broke off a piece of rock from the suspect crack cocaine and put it in a clear glass pipe with black burn marks and dark residue on it and told UC 212 something to the effect of, "here, take this." UC 212 told Thompson that UC 212 was already late for a meeting and that UC 212 couldn't

show up high. Thompson said, "well, I can't help you then." UC 212 then turned and left room 45 and left the Highlander at approximately 1:45 p.m. Thompson called UC 212 and apologized for making UC 212 late for a meeting and told UC 212 to call him later in the afternoon. Thompson told UC 212 that he needed to see UC 212 use illegal drugs in order to sell UC 212 heroin. Madison Police Case No. 2010-69562.

y. On March 17, 2010, Dane County Narcotics and Gang Task Force Detective Sabrina Sims met with Confidential Informant ("CI") 1266 in order to complete a controlled drug transaction with an individual by the street name of "Kane". "Kane's" real name is Xavier Garner and he lives in Room 46 at the Highlander. On March 17, 2010, Garner was observed leaving the Highlander to go meet CI 1266 at a restaurant. CI 1266 was in a parking lot of the restaurant when Garner got into the passenger seat of CI 1266's vehicle and then got out approximately 45 seconds later. CI 1266 left the parking lot and was followed by Undercover Officer ("UC") 211 and Sergeant Jason Freedman to a predetermined location where CI 1266 turned over two knotted baggie corners containing an off-white chunky substance that later tested positive for cocaine base. Madison Police Case No. 2010-70923.

z. On March 18, 2010, at approximately 4:25 p.m., Madison Police Sergeant Jason Freedman and other members of the Dane County Narcotics and Gang Task Force executed a search warrant at the Highlander Motel, Room 45. The search warrant was the result of UC 212 attempting to purchase heroin from Melvin Thompson in Room 45 of the Highlander on March 16, 2010. At the time UC 212 went to Room 45 to meet Thompson, Thompson had a bag of what appeared to be crack cocaine and broke off a piece of it and told UC 212 to smoke it. Thompson told UC 212 he could not sell him

heroin unless he saw UC 212 ingest illegal drugs. UC 212 did not ingest the crack and left the Highlander. The search warrant yielded the following evidence: a small rock of suspect heroin, cell phones, assorted drug paraphernalia (Chore Boy, pipes, burnt spoon, clear plastic baggie corner, clear plastic baggie corners knotted off, razor blade with white powder on edge; cardboard box of sandwich bags of 150 already opened). The resident of Room 45, Willie Robinson, DOB 9/1964, was home at the time the search warrant was executed. Madison Police Officer Michael Brennan asked Robinson if he thought the owner of the Highlander knew what was going on regarding drug activity and prostitution at the Highlander. Robinson stated that Mr. Wang should know what was going on and that he would have to be blind to not know about the drug activity and prostitution. Robinson stated that the activity takes place out in the open and that Mr. Wang should know what takes place at the motel. Robinson stated that he believes that Mr. Wang has had relationships with some of the female “crack whores” as he referred to them and that he believes these women visit Mr. Wang in his room. Robinson stated he has seen some of these females in Mr. Wang’s room in the past. Madison Police Detective Brian Austin interviewed Robinson after the search warrant was executed. Robinson stated that someone he knows as “JB” asked Robinson to rent a room in Robinson’s name at the Highlander. Robinson said that “JB”, who Detective Austin determined was Melvin Thompson, aka Pharo, paid for the room but did not live in it. Robinson said that Thompson rented the room in order to facilitate his sales of crack cocaine. Robinson said that Thompson comes to the room to make a few crack cocaine deals and then leaves. Robinson said that Thompson gives him the rent money and that Robinson then pays Mr. Wang. Robinson said that Thompson is in and out of Room 45

quite a bit. Robinson stated that Thompson doesn't smoke crack, he just sells it. Robinson admitted to smoking crack. Robinson said that Thompson also sells heroin. Robinson stated that Thompson often brings females to Room 45 to provide them with drugs and have sex with them. Robinson said that the individual who stays in Room 46 also sells drugs and that his street name is "Kane." Robinson stated that the individuals in Room 49 also sell crack and so does a female in Room 25. Madison Police Report No. 2010-69562.

aa. On March 18, 2010, Dane County Narcotics and Gang Task Force along with West Community Policing Team, Neighborhood and Patrol Units and K-9's O'Shea and Wilson executed a search warrant at Room 46 of the Highlander Motel. The search warrant was based on a controlled buy of crack cocaine by CI 1266 from the resident of Room 46, Xavier Garner, also known as "Kane." The search yielded the following evidence: \$86 in US currency; \$220 in US currency; \$39 in US currency, miscellaneous baggies, some of which have missing corners (located between the box spring and mattress); Triton T2 Scale (Located inside a speaker along the north wall); cell phone; Planter's Peanuts container with a false screw off bottom and Chore Boy. Madison Police Case No. 2010-70923.

14. Your Complainant knows from his training and experience that buildings where narcotics trafficking occurs are often the site of violent crimes and disturbances. The property located at 4353 W. Beltline Highway has been and continues to be the scene of criminal violence and disturbances, to wit:

a. On January 7, 2008, at approximately 10:26 p.m., Madison Police Officers Bob Veatch, Michael Goodchild, Dave Bielski and Marine Yoo were dispatched to the Highlander Motel reference a fight in the hallway. Officer Yoo arrived at the Highlander and saw an individual identified as Maurice Wilson, DOB 2/1986, talking with Officer Goodchild. Wilson's clothes were torn and he was very hyper and appeared to Officer Yoo to be out of breath. Willison told Officer Yoo said that he met an individual identified as Brandon Blamsit, DOB 2/1986, at the BP gas station next door to the Highlander and that Blamsit met up with a female at the gas station. Wilson said it was possible the female was a prostitute and that they gave her a ride back home to the Highlander (which is less than 1 block away from the BP). Wilson claimed that when they got to the Highlander he was jumped from behind by unknown assailants and then he got into a scuffle with one of the assailants. Wilson kept changing his story as to why his clothes were torn. Officer Yoo talked to the Highlander owner, Mr. Wang, and Mr. Wang told Officer Yoo that he had seen Wilson almost completely naked in the hallway and that he was in an argument with people down the hallway, most likely Room 33. Officer Yoo knocked on the door to Room 33 and nobody answered. The Officers then left the scene. Madison Police Report No. 2008-5736.

b. On January 12, 2008, at approximately 1:57 a.m., Madison Police Officers Marine Yoo and William Needleman were dispatched to a disturbance at the Highlander. Upon arrival at the Highlander, Officer Yoo contacted an individual identified as Christopher Blackmer, DOB 8/1980. Blackmer stated he had just been robbed by a black male who had just left the Highlander and was wearing a hoodie. Blackmer stated that he was punched several times by a male, later identified as Michael J. Ring, DOB 7/1984,

and that Ring had kicked in the door to Blackmer's room, which was room 28. At one point, Blackmer stated that he and Ring were fighting and "wrestling" for approximately 4-6 minutes in the lobby area of the Highlander. Ring left the Highlander and came back a short time later and was banging on Blackmer's door again and the owner of the Highlander said he saw Ring and Blackmer squaring off in the hallway in what he described as a not friendly way. Wang went into room 49 because he saw Ring begin to approach him. Ring began pounding on the door of Room 49, but eventually stopped. Officer Yoo made contact with Ring and noted that Ring appeared extremely intoxicated and tense. Ring was verbally combative with Officer Yoo and when he was placed in the squad, Ring was striking his head against the partition between the front and back seats. Officer Yoo had difficulty talking to Ring because of Ring's intoxication and his level of agitation. Ring was charged with Disorderly Conduct (3 counts) and Criminal Damage to Property. Madison Police Report No. 2008-9458.

c. On March 16, 2008, at approximately 5:10 p.m., Mr. Wang, owner of the Highlander called police to report that Michelle White, DOB 6/1977 and Veronica Alfred, DOB 3/1979, were fighting in the hallway of the Highlander. Madison Police Officer Mike Ott responded to the Highlander and by that time the parties were not fighting and had retreated to their respective rooms. Officer Ott observed a pile of hair extensions in the hallway outside of White's room. Officer Ott attempted to contact the occupant of Room 43, White, who he could hear crying hysterically inside. White would not answer the door and said that if she was going to jail, Alfred should go to jail too. White told Officer Ott to go away. Officer Ott attempted to contact Alfred in her room, but there was no answer. Madison Police Report No. 08-70398.

d. On March 20, 2008, at approximately 10:30 p.m., Madison Police Officer Carren Corcoran observed a pickup truck in the lot of the highlander occupied and running. The Highlander is posted for “No Trespass” and Officer Corcoran knows from her training and experience that the behavior of a vehicle sitting in the parking lot of the Highlander is a possible indication of someone attempting to purchase illegal drugs. Officer Corcoran and three other City of Madison Officers made contact with the vehicle. The driver, identified as Tommy Cooper, DOB 11/1968, said he was trying to get in touch with a worker to do construction work the next day. Cooper said the person resided in Room 35. Officer Corcoran went to Room 35 to verify Cooper’s story and there was no Room 35. Cooper and his passenger were both cited for Unlawful Trespass. Madison Police Report No. 2008-74424.

e. On March 21, 2008, at approximately 10:35 a.m., Madison Police Officer Scott Favour was dispatched to the Highlander for a report of child enticement. Officer Favour and Officer Cindy Thiesenhusen responded and made contact with the alleged victim, KSE, and her mother, K. Walker. KSE stated that she had gone to get ice cream and that when she was returning to the room a male, identified as Thomas Olson, DOB 1/1972, stepped out from Room 38 and said, “Hey, I need to talk to you for a minute.” KSE stated she continued walking and Olson came out of his room and said, “Hey, come here a minute. Come back into my room.” KSE stated that when Olson said this he grabbed her using his hands and grabbed her right arm near the elbow and attempted to tug her into his room. KSE said she pulled away from him and ran to her room and told her mother. Officer Favour went to Room 38 and made contact with Olson. Officer Favour noted a strong odor of intoxicants coming from Olson and observed that his

speech was somewhat slurred. Olson said he could not remember what he said to KSE but that after he said it a group of people came to his room, confronted him, and “slammed” him back into his room. Officer Favour placed Olson under arrest and he took him to the Dane County Jail where Olson registered a .41 on the portable breath test and was then taken to Detox. Olson was charged with Disorderly Conduct. Madison Police Report No. 2008-74804.

f. On April 12, 2008, at approximately 1:49 p.m., Madison Police Officer David Bielski and several other Madison Police Officers were dispatched to the Highlander reference a female screaming in the hallway and yelling that she was going to shoot someone. Officer Bielski arrived on scene and interviewed the caller, identified as Oscar Johnson, DOB 7/1965. Johnson stated that he was in his room and heard a female yelling, “I’m going to kill you, I’m going to shoot your ass.” Johnson also heard her say, “I’m going to kill some mother’s son today.” Johnson never left his room or looked out in the hallway to see who was screaming. Residents of Room 44 told Officer Bielski that they observed the female who had been screaming walk down the hall and go to Room 50. Officer Bielski went to room 50 and did not find anybody in that room. As Officer Bielski was leaving the Highlander, a female identified as Jessica Zingg, DOB 5/1987, told Officer Bielski that she had gotten in an argument with Cynthia Walker, who lives in Room 50, and that Walker was yelling at her because Zingg owed her some money. Madison Police Report No. 08-95616.

g. On April 30, 2008, at 3:20 p.m., Madison Police Officers Brian Shaul and Edward Marshall were dispatched to the Highlander reference an armed robbery that occurred in Room 40. Upon arrival, the Officers contacted the victim, Robert Echols,

DOB 10/1984, in room 40. Echols was holding a towel to his head and had a 1 ½ to 2" long cut along the top of his head near his forehead and appeared to be bleeding. It appeared that Echols was bleeding from his nose or mouth as well. Echols stated that he was attacked by two men while he was sitting on his bed. Echols said he believed he saw one of the men with a small pistol and that he thought he was hit in the head with the pistol. Echols stated that after he was hit in the head he and the two suspects wrestled on the bed and floor and that during this fight he was struck several times and at one point one of the suspects had his hands around his neck. Echols lost consciousness at one point and did not know if it was from being strangled or being hit in the head. Echols said when he came to that approximately \$200 was missing from his pocket. Echols was unable to give any further information regarding the suspects. Officer Shaul interviewed Harold Bender, DOB 10/1968. Bender said that he heard "hollering" out in the hallway and he exited Room 18 to see what was going on. Bender said he went down to Room 40 and saw his friend Echols had been injured. Bender said he saw two black males leaving the Highlander. According to Bender, one of the suspects he knew as "Ace" and that Ace is known to operate a 4-door white sedan. Bender was either unwilling or unable to provide any further information. Madison Police Report No. 2008-114328.

h. On May 3, 2008, at approximately 12:13 a.m., Madison Police Officers Deon Johnson and Bob Veatch were dispatched to the Highlander reference a 911 disconnect. Upon arrival, Officer Johnson contacted Latonia Hutson, DOB 11/1986. Hutson told Officer Johnson that Larry Nellem, DOB 1/1960, had entered her room through the window and he told her that he was trying to find his own room. Nellem resides in Room 46. Hutson told Nellem to "get the hell out of my room." Hutson said

that Nellem then told her that he was trying to rob the people in Room 44, which is between Hutson's room and Nellem's room. Officer Johnson asked Hutson where she could find Nellem and Hutson said he would be in Room 46. Officer Johnson made contact with Nellem in Room 46 and asked him if he knew why the police were called. Nellem responded, "them people robbed me." Officer Johnson asked Nellem to explain in more detail and Nellem stated, "I work on cars and those people robbed me." Nellem estimated they "robbed" him of approximately \$34. Nellem said he was referring to Hutson's boyfriend. Hutson told Officer Johnson that after Nellem left her room he returned and apologized and said that he was trying to rob room 44. Another resident, Cynthia Walker, told Officer Johnson that she heard Nellem tell Hutson that he was trying to rob room 44. Madison Police Report No. 2008-124774.

i. On May 29, 2008, at approximately 2:20 a.m., Madison Police Sergeant Galen Wiering was on routine patrol when he observed two people sitting out in front of the Highlander. Sergeant Wiering made contact with the two individuals and asked them if they were residents of the motel. Both responded "no." The individuals were identified as Andrea Shiflett, DOB 12/1985 and Devin Hanshaw, DOB 5/1963. Shiflett told Sergeant Wiering that she had been visiting Rick, last name unknown, in Room 38 but had left his room approximately 30 minutes ago. Hanshaw said that he was not visiting anyone and had been sitting there for approximately 1 ½ hours. When Sergeant Wiering first attempted to identify Shiflett, Shiflett gave the name of "Tina Clark" and a false date of birth. Shiflett eventually gave Sergeant Wiering her real name and Sergeant Wiering discovered she had a felony probation warrant for her arrest through the Department of Corrections. Shiflett was later transported to the Dane County Jail.

Officer Bob Veatch, who was also on the scene, said Shiflett, who was six months pregnant, told him that she had been smoking “crack” cocaine base on May 28, 2008. Shiflett and Hanshaw were both cited for Unlawful Trespass. Madison Police Report No. 2008-144648.

j. On August 18, 2008, at approximately 12:56 a.m., Madison Police Officer Samuel Ward was on patrol when he observed a parked vehicle with its lights on and two occupants sitting in the vehicle in the parking lot of the Highlander. Officer Ward is aware of ongoing issues with the Highlander relative to drug trafficking and trespassing. Officer Ward made contact with the occupants of the vehicle. The driver of the vehicle, Saquita Alimoar, DOB 11/1985, had two active warrants for Dane County and was taken into custody and transported to the Dane County Jail. Madison Police Report No. 2008-237595.

k. On August 18, 2008, at approximately 8:29 p.m., Madison Police Officer Brian Shaul was dispatched to the Highlander reference an unwanted person. Upon arrival Officer Shaul made contact with two individuals standing outside the Highlander who he identified as Heather Villarreal and Rodriquez Vinson. Vinson and Villarreal told Officer Shaul that they had rented a room at the Highlander earlier in the evening and that they paid \$50 for the room. Once in the room, Vinson and Villarreal noticed that the overhead lights were not working and Vinson discovered what he believed to be a bloodstain on the bed sheets. Villarreal asked Wang for a discount on the room due to its condition, but Wang refused telling them he would change the light bulb and that the stain on the bed was ink not blood. Officer Shaul spoke with Wang and Wang stated that he had changed the light bulb and he did not think the stain was blood because he had

washed the sheets several times and he thought that blood stains come out. Wang was not willing to give Villarreal and Vinson another room, so he refunded their \$50 and they left. Madison Police Report No. 2008-238537.

1. On September 4, 2008, at approximately 6:17 p.m., Madison Police Officer Justine Harris was dispatched to the Highlander reference an intoxicated person in the lobby. Upon arrival, Officer Harris made contact with a female identified as Peggy Turner, DOB 8/1964. Turner was sitting on a couch and appeared unable to get up from the couch on her own. Turner was holding a nearly empty pint of vodka. Officer Harris asked Turner to identify herself and Turner's voice was unintelligible. Turner appeared to be attempting to make words but only grunts and squeaks were heard. The owner of the Highlander, Wang, stated that Turner did not reside at the Highlander. Officer Harris determined that Turner was incapacitated due to alcohol use and possibly other drugs and was unable to stand up when asked to do so. Officer Harris told Turner she would be going to Detox at which point Turner curled herself into a ball and began slowly kicking her feet at Officer Harris. Turner became more combative and resisted efforts to get her up. Eventually, with the help of other Officers, Turner was put into a level three leg restraint system, placed in the back of a squad and taken to detox. Turner was cited for Unlawful Trespass. Madison Police Report No. 2008-257825.

m. On September 20, 2008, at approximately 11:53 p.m., several Madison Police Officers were dispatched to the Highlander reference a fight in progress. Upon arrival, Officer Kristen Devitt spoke with the victim, Mark Elvord, DOB 10/1957 and his fiancé, Kyra Austin, DOB 9/1967. Austin stated that the suspect, Steven Burgi, DOB 7/1955, was depressed about his girlfriend breaking up with him and that Austin felt bad

for Burgi so she let him come to their room where he was drinking vodka and orange juice. Austin said that while Burgi was in their room, he asked Austin to give him some Zanex. Austin refused to give Burgi her Zanex and Burgi began yelling at her and demanding the Zanex. At this point, Elvord arrived at the room and threw Burgi out and closed the door. Burgi came back and was knocking on the door and making a racket so Elvord opened the door to tell Burgi to go away. At this point, Burgi punched Elvord in the face with a closed fist. Elvord said he picked Burgi up and threw him out of the room and that Burgi then ran down the hall and started kicking the manager's office. Elvord stated this was when the manager called the police. Officer Kelly Beckett was also on scene and she spoke with Burgi. Burgi appeared intoxicated and refused to give Officer Beckett any details regarding what had happened other than to say they had argued over "stupid shit." Burgi was arrested for Battery, Disorderly Conduct and a Parole Violation. Madison Police Case No. 2008-276697.

n. On October 18, 2008, at approximately 12:30 a.m., Madison Police Officer Chark Vang was dispatched to the Highlander reference a disturbance with a knife in Room 38. Upon arrival, Officer Vang observed Madison Police Officers Brian Sheehy and Mark Allen were already on scene and had a black male, later identified as Mark Elvord, DOB 10/1957, in custody. Officer Vang observed a knife with a 5 1/2 " blade with blood on the blade on the floor and picked up the knife to take possession of it. Officer Vang spoke with Marguerite Evans-Moore, DOB 6/1968 and she told him that Krya Austin, DOB 9/1967, had come to her room and was helping her get ready for a date when Elvord kicked in the door to Elvord-Moore's room and then went back to his room. Austin, who lives with Elvord, followed Elvord back to his room. Austin told

Officer Vang that Elvord constantly tells her not to hangout with any other people and that she should not make any friends. Austin said that after Elvord kicked in the door and she went back to his room, she saw him with a knife and she watched him make several cuts to his abdominal area. Officer Vang observed several cuts on Elvord's abdominal and neck area and saw blood on his pants. Paramedics on the scene said Elvord should go to the hospital, but they did not transport him because his injuries were not serious. Elvord was charged with Domestic Disorderly Conduct While Armed and Criminal Damage To Property. Madison Police Report No. 2008-306869.

o. On November 4, 2008, Madison Police Officer Chark Vang and other Madison Police Officers were dispatched to the Highlander reference a fight taking place in the hallway near Room 41. Officer Vang arrived on the scene and walked toward Room 41. Officer Vang could hear several people shouting as he walked into the motel. Officer Vang observed a male black in a red shirt walking away from the group that was in the hallway. Officer Vang identified the two females on the scene as Latasha McMath, DOB 5/1984 and Terri Harper, DOB 2/1985. McMath told Officer Vang that she was visiting her friend Harper and that they were sitting out in the hall talking when the man in the red shirt, identified as M.D. Perry, DOB 2/1953, approached them and told them to "shut up." McMath said Perry approached them several times and the last time he walked over to them he pulled out his penis and continued walking toward McMath and Harper. McMath said Perry was holding his penis in his hand and said, "I got a \$25,000 dick. I'll fuck you. I'll fuck you and everyone else." McMath said she did not want the children in her room to see Perry holding his penis so she walked toward Perry and he punched her in the face near her jaw. McMath fell against the wall and then to the ground, scraping

her arm as she fell. Officer Vang also spoke to Harper who said she observed Perry punch McMath in the face after McMath confronted him about his behavior. Harper stated that several individuals came out of their rooms to break up the fight. Other witnesses confirmed Harper and McMath's version of events, although Perry denied that he hit McMath and that he had his penis out. Perry was charged with battery, Lewd and Lascivious Behavior and Disorderly Conduct. Madison Police Report No. 2008-32577.

p. On November 8, 2008, at approximately 11:39 a.m., Madison Police Officers Kelly Hoeft, Curt Fields and Sergeant John Rife were dispatched to the Highlander reference a case earlier that morning involving a man with a gun in Room 25 who was gone by the time police arrived. Upon arrival, Officer Fields went to the door of Room 25 at which time the door opened and then quickly shut. Officer Fields knocked on the door and an individual identified as Tobia Easter, DOB 12/1977, opened the door. The officers then completed a sweep of the room. Easter said that the room was rented by his girlfriend, so the Officers did not search the room because the girlfriend was not present. Officer Hoeft spoke with Terri Harper, DOB 2/1985, who lives in Room 41 and made the original call about a gun. Harper said that she had seen Easter with a gun in Easter's room and that she whispered something to her friend, Latasha McMath, DOB 5/1984, about seeing the gun and Easter then said to Harper and McMath, "You all going to get the fuck out of my mother fucking room" and began taking his shirt off. Harper then called the police. Officer Hoeft ran Easter through data and learned that he was on probation and was a felony offender. Officers did not see a gun anywhere, so they left the Highlander. Approximately five minutes after leaving the Officers were dispatched back to the Highlander. Harper had called stating that Easter had come to her room after

they left and threatened her. Harper said that her door was open a little bit when Easter came barging in and said, "Bitches you all called the police on me and I got something for you when I come back." Officer Hoeft spoke with Wang, the owner of the Highlander and Wang said that he saw Easter walking back after going to Harper's room. Wang told Officer Hoeft that something was going on between Easter's room and Harper's room and that Easter had made a comment about someone from Harper's room selling drugs. Easter was charged with Disorderly Conduct. Madison Police Case No. 2008-329917.

q. On November 8, 2008, at approximately 3:20 a.m., Madison Police Officers Chark Vang and Samuel Ward were dispatched to the Highlander reference somebody in Room 25 with a BB gun. A BB gun was found underneath a pillow on the bed in Room 25. Madison Police Case No. 2008-329681.

r. On November 21, 2008, at approximately 12:52 a.m., Madison Police Officers Trenton Scanlon and Samuel Ward were dispatched to the Highlander for a reported battery. Officer Scanlon arrived on the scene and made contact with a black male who was standing in the doorway of Room 29 holding a white towel over his face. Officer Scanlon observed blood on the towel and blood on the floor. The male was identified as Hilton White, DOB 10/1959. White stated he was "attacked" by two individuals who he identified as Mychiel Fair, DOB 4/1985 and Tiara Fair, DOB 5/1988. Hilton stated that both individuals were his girlfriend's children and that they had fled the area prior to police arriving. Hilton stated that his girlfriend, Demetrius Latham, had been living with him at the Highlander for a short time. Hilton was telling his sister that he was going to put Latham out, meaning he wanted to end their relationship. Hilton then began putting Latham's things in the hallway and the two scuffled a little bit. Latham

called her children to come and get her and when they got there, the Mychiel and Tiara jumped on Hilton and punched and kicked him several times in the face. Both Mychiel and Tiara told Officer Scanlon that when they arrived to pick up their mother, they observed Hilton push their mother, which was why, according to them, they punched Hilton. Hilton was transported to the hospital and given x-rays and a CT scan. Hilton did have a broken nose. Mychiel was charged with Substantial Battery and Tiara was charged with Disorderly Conduct. Madison Police Case No. 2008-342427.

s. On December 4, 2008, Madison Police Officer Brandon Mortenson and several other Police officers were dispatched to the Highlander reference a disturbance in Room 33 and a woman bleeding. Upon arrival, Officer Mortenson observed an individual, later identified as George Baugh, DOB 5/1949, standing in the doorway of Room 33 holding a can of beer. Officer Mortenson looked into the room and observed the victim, Kyra Austin, DOB 9/1967, sitting on the bed with what looked like a large gash to her left arm that was bleeding profusely. Officer Mortenson observed that Baugh was also bleeding from a cut to his left hand. Officer Mortenson got three different versions of events from Austin. Austin and Baugh live together in Room 33. There was an argument and it is unclear how either party was stabbed. However, several days earlier, Baugh had punched and kicked Austin and had broken her jaw. Austin still had a black eye from that incident and the broken jaw was discovered when Austin was taken to the hospital for treatment of her arm wound. Austin did say that another woman, Latonya Wilson, DOB 1/1972, had been involved in the altercation taking place on this date. Austin claimed Wilson attempted to choke her and also told Officer Mortenson that Wilson gave Baugh what she thought were a couple of rocks of crack cocaine. Baugh

told Officer Mortenson that Austin received her facial injuries when she tried to buy crack cocaine on Allied Drive. Baugh was charged with Substantial Battery. Madison Police Case No. 2008-354633.

t. On March 14, 2009, at approximately 10:00 p.m., Madison Police Officer Edward Marshall and several other officers were dispatched to the Highlander reference a disturbance in the hall. The Highlander's owner, Wang, told dispatch that a "Rickey" was damaging property inside the building. Upon arrival, Officer Marshall observed a large amount of broken glass strewn in the hallway near Room 38 and a broken frame and poster on the floor. Wang told Officer Marshall that "Rickey" had broken the door as well as the poster. An individual identified as Clifton Robsinson, DOB 11/1980, was standing by and told Officer Marshall that he observed the suspect, later identified as Rickey Carson, DOB 11/1966, pull the poster and frame of its hook on the wall and throw it down on the floor with great force, causing it to break. Robinson said Carson was yelling as he did this. Carson then went into Room 38, where he lives, and closed the door. Carson then began kicking at the door repeatedly and eventually kicked the door open. Officer Marshall observed that the door was damaged and that the strike plate appeared to have been torn from the wall. Officers outside of the Highlander had Carson in custody. When Officer Marshall went outside, he observed Carson lying on his stomach on the ground and three officers attempting to hold him down. Officer Marshall smelled a distinct odor of intoxicants coming from Carson and observed that Carson was very disoriented. Carson repeatedly kept trying to stand up by pushing against the three officers who were attempting to stabilize him. Officer Marshall found a knife with a 3" blade underneath Carson and picked it up. Madison Fire Rescue arrived on the scene to

evaluate Carson and determined he did not need treatment or transport. Carson was charged with Criminal Damage To Property and Resisting A Peace Officer. Madison Police Case No. 2009-72912.

u. On March 15, 2009, at approximately 7:07 p.m., Madison Police Officer Shane Olson was dispatched to the Highlander reference a domestic incident in which a male was allegedly beating a female outside. Upon arrival, Officer Olson did not observe anybody outside. Upon entering the Highlander, Officer Olson had contact with the Highlander owner, Wang. Wang stated a female had come inside and said something to the effect of, "he beat me." Wang stated the female walked down the hallway to Room 46. As Officer Olson walked to Room 46, he observed a black male identified as Norman Calvin, DOB 7/1970, exit the room. Calvin stated that he had intervened in a dispute between Sarah from Room 46 and another subject he did not know. At that time Sarah Wagner, DOB 8/1981, exited Room 46. Wagner told Officer Olson that a male who she does not know asked her to get into his vehicle. Wagner stated she refused and the male became upset at which point Calvin intervened. Wagner stated she had no idea who the other male was. Wagner was wearing black jeans, high-heeled boots, a pink tank top and two headbands tied around her head. Wagner stated she had been up all night and that she thought somehow this incident was related to Richard Hall, a subject who had hung himself a day ago in Room 38. Wagner had been seen having sex with Hall, an alleged drug dealer at the Highlander. Given the facts known to Officer Olson from the incident with Hall and the appearance of Wagner at that hour of the morning, and the fact that she alleged an unknown male wanted her to get in his car, Officer Olson suspected

that Wagner was engaging in prostitution. Wagner denied such activity. Madison Police Case No. 2009-73243.

v. On April 4, 2009, at approximately 1:30 p.m., Madison Police Officers Shane Olson and Kevin Dunnington were dispatched to the Highlander, Room 37, reference several people in the room smoking crack cocaine. Upon arrival, Officer Olson went to 37 where he found several people. The room was Clifton Robinson's room. Robinson said that there was nothing in the room and that Officer Olson could go ahead and search. Robinson said the only thing in the room was a bag of "weed" but that it was legal because it was in a package. Robinson reached over the top of his TV and lifted up a small clear knotted plastic baggie corner containing a leafy green substance that was consistent with the appearance of marijuana. Robinson set the baggie down on top of the TV and Officer Olson took possession of it. Robinson became upset about this because he said it was legal for him to have the marijuana. Officer Olson noted that as soon as he had entered the room, a woman who was in the room, identified as Christina Williams, DOB 12/1989, had gone into the bathroom and was in there for a period of time with the lights off. When she came out of the bathroom, she said she was on the toilet, however, the entire time she was in the bathroom, the door had been open and the way the bathroom is set up, the door would have to be closed for her to have been on the toilet. Officer Olson discovered Williams had a warrant for her arrest through probation and parole and was placed in custody and taken to the Dane County Jail. Madison Police Case No. 2009-94318.

w. On April 16, 2009, at approximately 4:06 a.m., Madison Police Officers Marine Yoo and William Needelman were dispatched to the Highlander reference a

woman being thrown onto a bed in Room 34. Upon arrival, Officer Yoo contacted Ivy Sowinski, DOB 8/1971 and Richard Kirklewski, DOB 11/1957. Sowinski told Officer Yoo that she was walking in the hallway near Room 34 which is Brian May's, DOB 4/1972, room. May was out in the hallway and asked Sowinski to go into May's room, which Sowinski did. Once in the room, Sowinski stated that she sat on May's bed and May went into the bathroom. May came out of the bathroom and she stood up and attempted to leave and May allegedly stood in front of the door and held up his arms and asked her, "what can I do to convince you to stay?" Sowinski left the room and went back to her room and told her boyfriend, Kirklewski that May had thrown her on the bed. Officer Yoo went to talk to Kirklewski and Kirklewski said after the incident, May called Kirklewski and asked Kirklewski if he could "buy" Sowinski. May denied asking Kirklewski if he could buy Sowinski. Officer Yoo observed that Sowinski did not appear agitated or upset at all until Officer Yoo said there were no injuries or evidence of any criminal activity and that he was not going to charge May with anything. At that point, both Sowinski and Kirklewski became upset and were yelling at the Officers. The Officers then cleared from the scene. Madison Police Case No. 2009-105981.

x. On April 23, 2009, at approximately 8:56 p.m., Madison Police Officer Michael Mendenhall and several other Madison Police Officers were dispatched to the Highlander reference a disturbance. Upon arrival Officer Mendenhall spoke with the owner, Wang, who stated that there was a disturbance down the hallway in Room 42. Officer Mendenhall walked down the hallway and observed Madison Police Sergeant Jason Freedman talking with a black male. Upon arriving at Room 42, Officer Mendenhall saw a black female sitting on the bed. The woman was identified as Ravina

Boyd, DOB 7/1957. Boyd was very upset and crying. Boyd stated that she had gotten into a verbal and physical argument with her fiancé, Marcus Flowers, DOB 7/1952. Boyd stated that Flowers had choked her and had hit her all over. Boyd stated that Flowers had come into the room and went into the bathroom and was washing his face when Boyd pushed him from behind. Flowers turned around and pushed Boyd toward the bed. Boyd said she was mad because Flowers had been with another woman. While on the bed, Boyd said Flowers began choking her and she was kicking at him. Boyd said she kicked Flowers two to three times and that Wang from the front desk came down and looked in their door, which was partially open, and said he was calling the police, at which time Flowers got off Boyd. Boyd then kicked Flowers in the stomach. Boyd said Flowers also hit her in the face. Officer Mendenhall did not see any marks on Boyd's face, but did notice that her left eyeball was red. Officer Mendenhall spoke with Flowers and Flowers denied hitting Boyd. Officer Mendenhall then spoke with Wang and asked him what he saw. Wang said that he heard a lot of yelling and cursing down the hall and said it was Boyd yelling. He called Room 42 and asked Boyd to be quiet and Boyd told Wang he didn't know "what the fuck he was talking about." She then hung up on Wang. Wang then walked down to the room and observed Boyd intentionally drop the TV on the floor and break it. Wang did not see any physical altercation between Boyd and Flowers. Wang said Boyd has frequently caused problems at the Highlander and that he does not want her to come back. Boyd was arrested for Disorderly Conduct and taken to the Dane County Jail. Madison Police Case No. 2009-114469.

y. On May 1, 2009, at approximately 10:37 p.m., Madison Police Officers Sarah Mackesey and Erik Fuhrmann were dispatched to the Highlander reference an

unwanted person. Upon arrival, Officer Mackesey observed a man, identified as Michael Arms, DOB 5/1952, sitting on the hallway floor by the ice machine in a pool of his urine. Arms told Officer Mackesey that he had been drinking and that he drank too much. Arms said that he was not staying at the Highlander. The Highlander owner, Wang, said that Arms was attempting to enter a room and the woman inside shoved him out. Officer Fuhremann attempted to speak to this woman and she denied knowing Arms. Arms was taken to Detox. Madison Police Case No. 2009-123400.

z. On June 3, 2009, at approximately 6:56 p.m., Madison Police Officer John Gray was dispatched to the Highlander reference a male black kicking in the door to Room 31. Upon arrival, Officer Gray made contact with the Highlander owner, Wang, and Bernum Cousino, DOB 4/1948. Cousino stated he was in his room with the door locked when someone knocked on the door. Cousino answered the door and the subject said, "oops, wrong door." Cousino closed the door and locked the deadbolt and then heard a bang and the door was kicked in. Cousino said the suspect was in Room 33. Officer Gray went to Room 33 and contacted two female blacks who were in the room and allowed him to check for the suspect. He was not there and they females said no one matching the description had been there. Madison Police Case No. 2009-160706.

aa. On June 7, 2009, at approximately 10:21 p.m., Madison Police Officers Sarah Mackesey and William Needleman were dispatched to the Highlander reference a possible domestic in Room 18. Upon arrival, Officer Mackesey went to the door of Room 18 and could hear a loud male voice inside saying that the female inside should go. The door was immediately opened by a man, later identified as Vincent White, DOB 12/1965. White appeared very agitated. Behind White was a female, later identified as

Aree Hinsman, DOB 10/1966. Hinsman had smeared eye makeup and appeared to have been crying. Officer Mackesey asked White what was going on and he began screaming that this was his home and that white people were always arresting black people. White said nothing had happened. White told Officer Mackesey that he was going to kill her and Officer Mackesey immediately attempted to place White in handcuffs. White struggled and began screaming that he was going to kill Officer Needelman and Officer Mackesey. White broke free and began screaming over and over that he was going to kill the Officers and he was screaming for Hinsman to come out of the bathroom and say that nothing happened. White was every agitated and his eyes were bulging and he was foaming at the mouth. The Officers eventually got White out of the room. Hinsman then came out of the bathroom and told Officer Mackesey that White is a paranoid schizophrenic. Hinsman said she came back from work and White began calling her names such as “ho, bitch, nigger and prostitute.” Hinsman said that White gets suspicious ideas in his head and thinks that Hinsman is “screwing people” in his car. Hinsman said that White was raging and screaming and calling her names and getting very close up in her face. Hinsman said she was afraid of White. The owner of the Highlander, Wang, told Officer Mackesey that he heard a male screaming “I’m going to kill you” and followed the sounds to Room 18 and then called the police. White was charged with Domestic Disorderly Conduct, Domestic Intimidation of a Victim, Resisting a Peace Officer, Person Making Unreasonable Noise, and Disorderly Conduct. Madison Police Case No. 2009-165445.

bb. On July 14, 2009, at approximately 10:15 a.m., Madison Police Officer Ted Fondrk was dispatched to the Highlander reference a disturbance. Upon arrival,

Officer Fondrk contacted Brian May, DOB 4/1972. May had a welt on his head. May smelled of intoxicants and was slurring his speech. May said that a white male in his 30's had hit him. May did not know the person's name despite knowing him for 2 years. May could not provide any specifics about the incident. May then said his assailant was a black male and then changed the story again and said it was a black female. May was checked by fire rescue but declined treatment. Madison Police Case No. 2009-107107.

cc. On July 14, 2009, at approximately 9:21 p.m., Madison Police Officer Bob Veatch and several Other Madison Police Officers responded to the Highlander for a report of a man with a knife. While enroute dispatch advised that someone had tried to break into Room 34. The suspect was reported to be somebody the complainant owes money to. Dispatch advised that the suspect was wearing a black t-shirt with a logo on it that might be a "T". Upon arrival, Officer Veatch observed a black male wearing a black t-shirt that was covered with logos that resembled a "T". However, when identified, this person did not come back with the name "Marty" which the complainant report was the suspect's name. Officer Veatch proceeded to the manager's office where he contacted Brian May, DOB 4/1972. May said that two subjects came to his door. He identified the two as Marty and "T". May said they were brothers. May stated that he had met both brothers a couple of days ago and had borrowed \$110 from Marty the night before, but paid Marty back in full that morning. May said that Marty and "T" came to his door and opened the door and stood in the threshold. Marty had a small pocketknife that he was holding and Marty asked May, "where's my money." May said that he told Marty that he had paid him back in full. May got a U-lock bicycle lock and made a move towards Marty with it and Marty then stepped backwards and May slammed his door shut and put

a chair underneath the doorknob. May had tried to call the police but Highlander management had cut off his phone so he couldn't. Officer Veatch asked May why he borrowed the \$110 and May said he didn't want to tell Officer Veatch why. Officer Veatch asked the Highlander Owner, Wang, if he knew the two people May was talking about and Wang said that he believes he knows who they are and he believes they come to the motel to sell drugs. Officer Veatch was notified by Officer Loos that Officer Loos had detained two individuals who matched the description of the suspects. Officer Veatch proceeded to that location and contacted an individual identified as Deandrae Mayweathers, DOB 2/1991, Mayweathers said he had gone to the Highlander to talk to May to see if he was straight. Mayweathers said that Brian never repays his debts so he just doesn't worry about it anymore. Officer Veatch also contacted Tavon Meyers, DOB 6/1992, who goes by the nickname "TT". Meyers said he did not know why they went to talk to May at the Highlander and that when they contacted May, he had a lock in his hand and was acting aggressively and weird. Mayweathers and Myers were both told not to come on to Highlander property again. Madison Police Case No.2009-207728.

dd. On July 18, 2009, at approximately 10:15 p.m., Madison Police Officers Samuel Ward and Carren Corcoran were at the BP next door to the Highlander when Officer Ward observed an individual he knew to be Otis Meyers, DOB 2/1990. Officer Ward saw Meyers exit the driver's seat of the a white vehicle, go into the convenience store at the BP and mill around for a while before exiting and heading over to the Highlander. Officer Ward knows that Meyers does not have a valid driver's license. Officer Ward watched Meyers enter the east entrance door of the Highlander. Approximately five minutes went by and Meyers then exited the east entrance of the

motel and stayed on the porch area. Officers Ward and Corcoran determined that Meyers was not going to come back to the BP so they headed to the Highlander. Meyers then went back in the motel's east entrance. Officer Ward entered the motel and observed Meyers entering Room 47 with a key. Officer Ward knocked on the door and Meyers opened it when Officer Ward identified himself as Madison Police. Meyers said he was visiting his friend. Officer Ward told Meyers that the motel has a policy that no visitors are allowed on the premise after 10:00 p.m. Officer Ward escorted Meyers to the front desk and asked the owner, Wang, if Meyers was renting a room to which Wang responded, "no." Meyers was cited for Unlawful Trespass and Operating Without A Valid Driver's License. Madison Police Case No. 2009-212237.

ee. On July 17, 2009, at approximately 9:29 a.m., Madison Police Officer Mike Ott was dispatched to the Highlander. Upon arrival Officer Ott contacted Bernum Cousino, DOB 4/1948. Cousino said he wanted to file a police report because he was bitten in the left arm by a prostitute whose name he believes is Sharon. Cousino said that Sharon has been coming around his room fairly regularly for a few years and that it is his personal practice not to speak to the prostitutes he consorts with. Cousino refused medical attention. Madison Police Case No. 2009-210369.

ff. On July 22, 2009, at approximately 2:16 a.m., Madison Police Officer Solon McGill was conducting surveillance on the Highlander. Officer McGill was observing several male blacks who he believed were engaged in short-term drug trafficking. Officer McGill had been watching these individuals periodically throughout the night and had seen them make numerous contacts with individuals in the parking lot of the Highlander. Officer McGill observed a small black two-door vehicle enter the rear

entrance to the Highlander. Officer McGill did not recognize the vehicle as belonging at the Highlander. The vehicle pulled into the lot then backed into a parking spot just out of sight of Officer McGill and behind a shed. Officer McGill observed the male black wearing a white t-shirt in front of where the vehicle had parked. Officer McGill then observed a male black wearing a dark-hooded sweatshirt coming from the area of the western door of the Highlander. Both males then approached the area where the vehicle had parked. Officer McGill saw the black vehicle suddenly pull forward and rapidly accelerate toward Helene Parkway. Officer McGill observed that the male with the dark hooded sweatshirt was clinging to the passenger side of the vehicle with part of his upper body inside the window. The vehicle continued to accelerate as the male held on. Officer McGill estimate the vehicle was going 40 mph. Officer McGill pulled forward and activated his emergency lights in an attempt to stop the vehicle. The vehicle continued at a high rate of speed down Helene Parkway. Officer McGill managed to cut the vehicle off and it came to a stop and the male who had been clinging to the vehicle ran in the direction of the Highlander. Officer McGill ordered all occupants to stay in the vehicle. Other Madison Police Officers set up a perimeter around the Highlander. Officer Jeff Felt and his K9 were unable to locate the male who had fled. Officer McGill contacted the driver of the vehicle, Quinn Thiessen, DOB 6/1979. Thiessen said that he saw the male in the black hoodie smoking a cigarette at the Speedway Gas Station on Verona Road and asked him for a cigarette. The male said he would give Thiessen a cigarette if Thiessen gave the male a ride to the Highlander. Thiessen said when they got to the Highlander the male black offered to sell him some “dro”. Thiessen said “dro” is “good weed.” Thiessen said he told the male black that he was not interested in buying weed and that

the male than reached into the car and tried to grab Thiessen's wallet, at which point Thiessen took off with the male black clinging to the vehicle. Thiessen changed his story a couple of times. Officer McGill asked Thiessen why he back his vehicle into a parking space if he was just dropping someone off. Thiessen had no explanation for that. Officer McGill asked Thiessen for consent to search his vehicle and Thiessen said yes. Officer McGill searched the vehicle and found two small knotted plastic baggie corners which were ripped off and consistent with packaging for illegal narcotics. Officer Zach Haggerty was on the scene and opened the trunk to search the trunk. Inside the trunk Officer Haggerty found a black powder firearm. Thiessen is a felon and not allowed to possess firearms. The Officer in Charge, Sergeant Tim Radke, had run Thiessen and discovered through previous contacts that Thiessen had attempted to steal cocaine from dealers in the past. Based on that information and what Officer McGill had observed and what Thiessen had told him, Officer McGill concluded that Thiessen was involved in some sort of drug transaction at the Highlander that went bad. Thiessen was charged with Unlawful Trespass, 2nd Degree Recklessly Endangering Safety and Felon In Possession Of A Firearm. Madison Police Case No. 2009-215476.

gg. On July 30, 2009, at approximately 11:01 a.m., Madison Police Officer Justin Clark was dispatched to the Highlander reference a disturbance. Upon arrival, Officer Clark contacted Jasmine Kidd, DOB 12/1989. Kidd told Officer Clark that she had gotten in an argument with her baby's father, Jessie Ferguson, DOB 11/1988. Kidd said that Ferguson yelled at her and then pushed her into a wall and punched her a few times with a closed fist. Officer Clark observed that Kidd's left eye was swollen and her lower lip was swollen and had a bite mark on it. Kidd said that Ferguson then got a bottle

of bleach and opened it and said that Kidd was not leaving. Ferguson then poured the bleach out intending to pour it on Kidd's belongings, however, he missed and the bleach went on the floor and some splashed on Kidd's friend, Molly Williams. Officer Clark then contacted Ferguson who had fled the scene and was found in a green space behind the Highlander. Ferguson admitted that he and Kidd got into an argument, but denied hitting Kidd. Officer Clark went to the room where the incident occurred and could smell a strong bleach smell in the room. Ferguson was arrested for Domestic Battery. Madison Police Case No. 2009-224413.

hh. On July 30, 2009, at approximately 11:55 p.m., Madison Police Officer Solon McGill and West District Community Policing Team were focusing on short-term drug trafficking at the Highlander. Officers observed a distinctive silver pickup truck with a different colored front quarterpanel leaving the lot of the Highlander after its occupants contacted other people in the lot. A traffic stop was made on the vehicle and the occupants were identified and asked to exit the vehicle. The passenger, Clifton Jones, DOB 11/1959, had a valid arrest warrant. The driver, Melvin Horton, DOB 3/1958 consented to a search of the vehicle and during the search, Officer McGill located a metal spoon with a blackened charring or burn marks on the bottom. In the interior of the spoon was a whitish residue that appeared to be consistent with heroin. Officer McGill knows through his training and experience that it is common for heroin users to use a spoon to cook up the drug prior to injecting it. Officer McGill asked Horton if he knew who was dealing heroin and Horton stated that if the police were watching the lot at the Highlander they should have seen lots of stuff going on and should know who was

involved. Horton and Jones were both cited for Unlawful Trespass. Madison Police Case No. 2009-225215.

ii. On September 20, 2009, Madison Police Officer William Needelman was dispatched to the Highlander for a report of the owner, Wang, being attacked. Upon arrival, Officer Needelman contacted Wang. Wang had a swollen right eye with a small laceration under it that was bleeding. He had dried blood on his nose and in his nose and a small laceration on his left elbow. Wang stated that he had never seen the suspect before. Madison Police Officer Marine Yoo had stopped a suspect matching the description of Wang's attacker. Officer Needelman proceeded to Officer Yoo's location. The suspect was identified as Brian Love, DOB 8/1985. Officer Needelman confirmed that Love matched the description given by Wang. Officer Needelman went back to speak with Wang. Wang stated that as he was making his nightly rounds he came upon Love in the hall and asked Love what he was doing. Love said he was looking for someone in Room 19. Wang stated there was nobody in Room 19 and that unless he was going to stay there, Love should leave. Love told Wang he wanted to stay and asked how much a room was. Wang said it was \$50 and Love said he didn't have enough money and left out the front door. Wang went to check the other doors and when he was in the Western wing Love attacked him from behind, putting him in a reverse choke hold. Wang tried to yell for help but could only whisper. Love threw Wang on the ground and started checking his pockets. Wang said he thought Love was trying to rob him and that Love kept saying over and over, "I need money, I need money, I need money." Wang said Love checked all his pockets and got off him and Wang tried to get up at which point Love hit Wang several times in the face with a clenched fist. Wang refused medical

attention. Officer Needelman talked to Love, and Love said he had been at the Highlander looking for a friend. Love denied contact with Wang. Love was arrested for Aggravated Battery, Robbery With use Of Force, Strangulation/Suffocation and Resisting/Obstructing A Peace Officer. Madison Police Case No. 2009-283259.

jj. On September 24, 2009, at approximately 3:15 p.m., Madison Police Officer David Wixom observed a man, later identified as Keandrew Thomas, DOB 3/1990, sitting on the railing of the steps leading to the west entrance of the Highlander. Officer Wixom attempted to make contact with Thomas but Thomas ducked into a motel room. Madison Police Officer Eric Vosburg was conducting surveillance at the Highlander and he told Officer Wixom when Thomas came back out. At approximately 4:20 p.m., Thomas was again sitting on the railing. Officer Wixom, along with Officer Josh Acker and Chris Kobinsky went in the main entrance and down the hallway and came out the West door to contact Thomas. Thomas seemed surprised and immediately began to walk away from the Officers. Officer Wixom grabbed Thomas's wrist and told him to stay where he was. Thomas said he was visiting Marguerite Evans in Room 16, although Evans was not around at any time that Thomas was at the Highlander. Another subject by the name of Robert Fowler was sitting nearby on a bicycle and Officer Wixom knows Fowler is not a tenant at the Highlander. Thomas and Fowler were both cited for Unlawful Trespass. Madison Police Case No. 2009-287149.

kk. On September 29, 2009, at approximately 10:25 p.m., Madison Police Officer William Needelman was on routine patrol around the Highlander when he spotted a vehicle sitting in the westernmost part of the parking lot with one female occupant, later identified as Charneese Alexander, DOB 11/1991. All areas of the parking lot are posted

“no trespassing.” The vehicle then drove down the frontage road and turned around in the McDonald’s parking lot before heading back to the Highlander area. The vehicle pulled into the 4000 block of Britta and stayed there for approximately five minutes before stopping back in the Highlander parking lot. Based on the driving behavior, that the vehicle was in the lot for a short period of time and then in the Britta lot right next to the Highlander for a short period of time, Officer Needelman initiated a traffic stop. Officer Needelman made contact with the driver, Alexander, who stated that she was waiting to pick up a friend, later identified as Milton Moore, her passenger. Officer Needelman contacted Moore and discovered he had a probation hold and several arrest warrants. Moore was taken into custody. Alexander was cited for Unlawful Trespass. Madison Police Case No. 2009-292888.

ll. On October 12, 2009, at approximately 11:00 p.m., Madison Police Officer William Needelman was dispatched to the Highlander to make contact with Lorene Sigers who stated she lent her car to an individual who was in Room 49 and would not give her keys back. Officer Needelman said that she had lent her car to Rufus Reynolds and that he was supposed to have the car back hours ago. Sigers got a phone call from a friend saying her car was at the Highlander and that Reynolds was in Room 49. Officer Needelman went to Room 49 and Reynolds was there and he was the only one in the room. The room was rented to a Ms. Carter and Reynolds said he did not know where she was. The Highlander owner was nearby and said that Reynolds was not a registered guest and that he did not want Reynolds on the property. Reynolds gave Sieger’s vehicle keys to Officer Needelman and Reynolds was escorted off the property and issued a citation for Unlawful Trespass. Madison Police Case No. 2009-312037.

mm. On October 31, 2009, at approximately 4:57 a.m., Madison Police Officer Solon McGill was dispatched, along with numerous other Officers, to the Highlander reference a disturbance. Upon arrival Officer McGill contacted Cynthia Lewis, DOB 1/1961, who said that she observed people coming in and out of the window of Room 37 after she heard a banging on the window. Lewis stated she could hear the sounds of a disturbance and male voices yelling. Lewis stated she heard the sound of a physical struggle and sounds of someone being beaten up. Officer McGill could hear several voices coming from Room 37 and knocked on the door and got no response. Officer McGill knocked again and announced that it was Madison Police and that somebody needed to come to the door. Again, nobody came to the door. Officer McGill knocked again and said he would force entry if nobody answered and at this point a female, identified as Melissa Campbell came to the door along with Victor Davis. Campbell and Davis walked out followed by a male later identified as Dallace Beasley. Beasley walked out and quickly pulled the door shut behind him. Officer McGill had observed a black female in the room before Beasley pulled the door shut, but Beasley denied anyone else was in the room. Davis and Campbell said they had come to the room to purchase some DVD's from Beasley. Eventually Beasley stated that his wife or girlfriend, Anna Dillard was in the room and he had her come out. Beasley seemed very uneasy with the idea of the police entering his room and he refused to let officers check to see if anyone else was in the room. Campbell said that she and Davis had met Beasley at the BP and Beasley offered to sell them a large flat-screen TV which Campbell stated she knew "was hot." Eventually Beasley let the Officers look through the room and they did not find any other people in the room. Officer McGill did find a large flat screen TV partially shoved under

the bed. Officer McGill was unable to determine if the TV was stolen. Beasley was on paper for burglaries. Madison Police Case No. 2009-324477.

nn. On November 4, 2009, at approximately 5:30 p.m., Madison Police Officer Deon Johnson was dispatched to the Highlander reference a disturbance. While on scene, Officer Johnson was informed by a man named Mike that Donuala Havens in Room 32 was consuming drugs. Mike stated that there was another person in the room and a fight had recently taken place in the room. Officer Johnson knocked on the door to Room 32 and eventually Havens answered the door and stated she was okay. Havens stated that she had taken either crack or cocaine and did appear to be showing the effects of taking it. Havens said she had not used in a long time and that she came to the Highlander specifically to use. Madison Police Case No. 2009-329267.

oo. On November 7, 2009, at approximately 1:08 a.m., Madison Police Officer Solon McGill observed a blue Dodge Dakota truck in the parking lot of the Highlander Motel. Officer McGill is familiar with the majority of vehicles that belong in the lot and did not recognize the Dakota and had seen the same truck several minutes earlier at 2234 Allied Drive. Both locations are known to McGill for high volume of short term drug trafficking. Officer McGill contacted Osmero Guzman, DOB 1/1974, who was sitting in the driver's seat. Guzman initially gave Officer McGill a false name and false date of birth. Once Officer McGill got Guzman's correct name, he discovered Guzman had an active warrant for his 3rd offense OMVWI. Guzman was arrested for the warrant and cited for Unlawful Trespass. Madison Police Case No. 2009-331761.

pp. On November 13, 2009, at 2:10 p.m., Madison Police Officer Joshua Acker and Madison Police Sergeant David McClurg attempted to contact a Jon

Zimmerman at the Highlander, Room 49 due to Zimmerman having two active warrants through Columbia County. Officer Acker and Sergeant McClurg knocked on Room 49's door several times and eventually Zimmerman answered his door. Zimmerman was arrested on the outstanding warrants and taken to the Dane County Jail. Madison Police Case No. 2009-338259.

qq. On November 7, 2009, at approximately 7:53 p.m., Madison Police Officers Molly Thomson and Michael Mendenhall were dispatched to the Highlander reference a physical disturbance in Room 18. Upon arrival Officer Thomson made contact with Room 18 and observed three males and one female in the room. Another male, identified as Timothy Bambrough, DOB 6/1958, was lying face down on the bed and once Officer Thomson had contact with him she observed that he was highly intoxicated. Bambrough was eventually taken to Detox. All individuals Officer Mendenhall contacted in Room 18 were intoxicated to the point where it was very difficult for Officer Mendenhall to get a clear statement of what had happened. Besides Bambrough, the individuals were identified as Cynthia Lewis, DOB 11/1961, Jimmie Smith, DOB 4/1952 and Stephan Zaring, DOB 12/1970. Lewis told Officer Mendenhall that Zaring had slapped her and that she did not know why. Zaring denied slapping Lewis although he admitted they had argued about something but he couldn't remember what. Smith said that Zaring did slap Lewis and that he wanted Zaring to leave. Zaring did collect his things and left the room and closed the door to Smith's room. Officer Mendenhall then heard a voice which sounded like Bambrough say he was going to "knock you through the wall." Smith and Bambrough told Officer Mendenhall they were "just joking" and everything was okay. Officer Mendenhall and Officer Thompson then

went down the hallway and were talking near the main desk when Smith came from his room and walked toward the Officers carrying a pocket knife with the blade open. Officer Thomson drew her firearm and ordered Smith to drop the knife, which Smith did. Smith stated he was just trying to return the knife to Zaring. Madison Police Case No. 2009-332567.

rr. On November 25, 2009, at approximately 1:04 a.m., Madison Police officers Matthew Aures and Marine Yoo were dispatched to the Highlander reference a check person. Upon arrival Officer Aures observed a black male, later identified as Carl Moore, DOB 8/1961, sitting on the hallway floor with his back up against the wall appearing to be asleep. Officer Aures attempted to wake Moore using verbal commands and Moore did not respond. Officer Aures then began shaking Moore's shoulder and Moore opened his eyes and asked Officer Aures what was going on. Moore said that he did not live at the Highlander and he was not visiting anyone there. Moore appeared intoxicated as he was slurring his words and unsure of the time of day and he had an odor of intoxicants on his breath. Moore said he lived on Atticus Way and Officer Aures transported him to that location. Once there, Moore became verbally argumentative and began yelling very loudly and using vulgar language. Moore's wife woke up due to the yelling and came out and said that Moore was not welcome at the apartment. Moore continued yelling and using vulgar language. Moore was placed under arrest for Disorderly Conduct and also charged with Unlawful Trespass and taken to the Dane County Jail. Madison Police Case No. 2009-349725.

ss. On November 30, 2009, at approximately 5:48 p.m., Madison Police Officer Edward Marshall observed a gray Pontiac vehicle parked near the east door of the

Highlander. The vehicle was running and appeared to be occupied by a white female driver, later identified as Nicole Dorn, DOB 3/1984. Officer Marshall approached the vehicle and when Dorn rolled down the window he immediately smelled the odor of burnt marijuana. Dorn said she was dropping off a friend named "Kenny." Officer Marshall knows from his training and experience that it is common practice for a passenger to exit a running vehicle to make a drug transaction inside a dwelling or structure and that such transactions are referred to as "short term traffic." While Dorn was talking with Officer Marshall, her friend "Kenny" emerged from the motel. Kenny stated that he dropped off "Kevin" at this location. Kenny then admitted that he was dropped off at his own request so that he could visit a female known to him only as "Chocolate." Dorn was cited for Unlawful Trespass. Madison Police Case No. 2009-354373.

tt. On November 30, 2009, at approximately 2:49 p.m., Madison Police Officer Kenneth Mulry was dispatched to the Highlander reference a fight about to happen near Room 16. Officer Mulry arrived at the Highlander and spoke with Marguerite Evans who stated that she had gotten into a verbal argument with Robert Fowler. Evans said that Fowler is not supposed to be staying at the motel but she felt bad for him because he is homeless. Evans said that she and Fowler frequently argue and that today the motel owner, Wang, intervened and Fowler left the room. Fowler had an outstanding warrant and was taken into custody and transported to the Dane County Jail. Madison Police Case No. 2009-354163.

uu. On December 1, 2009, at approximately 2:23 a.m., Madison Police Officers Justin Garcia and Marine Yoo were at the Highlander to check a vehicle.

Officer Garcia observed a red 4-door car with someone in the driver's seat in the parking lot. The driver was identified as Mark Cox, DOB 9/1984. Cox said he had just given his friend Angela a ride to the Highlander so she could pick up some money from a friend. Cox was informed that he was trespassing and asked to exit the vehicle. Officer Garcia asked Cox if he had anything illegal on him and Cox said that he had a marijuana pipe in his pocket. Officer Garcia confiscated the marijuana pipe which he noted had marijuana in it and smelled like marijuana. Officer Jane Preston overheard the Cox saying he gave Angela a ride to the Highlander. Officer Preston observed a woman, later identified as Angela Klahn, DOB 4/1988, exit the Highlander and approach Cox's vehicle. Officer Preston approached Klahn and asked her if she was with Cox. Klahn said that the driver's name was Mark but that she did not know his last name. Klahn said she was at the Highlander attempting to collect money owed to her by a Highlander resident she knew only as "Rick." Klahn stated that she lent "Rick" \$30 and she did not know what he used it for or why he needed it. Klahn was cited for Unlawful Trespass. Madison Police Case No. 2009-354683.

vv. On December 15, 2009, at approximately 6:13 a.m., several Madison Police Officers were dispatched to the Highlander reference a 911 call and a female stating her girlfriend had just beat her up. Upon arrival, Officer Alyssa Palmer contacted the complainant, Lorraine Cook, DOB 5/1955. Cook said that she had been trying to sleep in her room, Room 39 and that her girlfriend of eight years, Cynthia Lewis, kept trying to talk to her all night and would not shut up. Cook said both parties had been drinking alcohol through the night. Cook said Lewis starting kicking and hitting her because Cook was trying to sleep and wouldn't talk to Lewis. Cook said she told Lewis

to stop and Lewis would not so Cook called 911. Officer Palmer made contact with Lewis and observed that Lewis was bleeding profusely from a lacerated lip. Lewis said that she had been sleeping when Cook started kicking and hitting her. Lewis said that Cook has a history of domestic violence. Fire Rescue responded and advised that Lewis would probably need a stitch or two in her lip. Officer Palmer stated she would take Lewis to the hospital and then to the Dane County Jail. Cook was arrested for Domestic Battery and Lewis was arrested for Domestic Battery and a probation violation. Madison Police Case No. 2009-370189.

ww. On December 27, 2009, at approximately 10:36 p.m., Madison Police Officer William Needelman was on routine patrol in the parking lot of the Highlander when he saw an occupied vehicle running in the lot. The vehicle had been running for approximately five minutes and the plate came back to a Waunakee address. Officer Needelman made contact with the occupant of the vehicle and identified her as Shannon Haff, DOB 9/1989. Haff said that she was waiting for her roommate's brother to come out. Haff said that her roommate's brother, Craig, asked her to drive him to the Highlander to see his girlfriend. Haff said she did not know Craig's last name, did not know his girlfriend's name and did not have a phone number for Craig. Haff also denied knowing her roommate's last name even though she had lived with him for several months. Officer Needelman cited Haff for Unlawful Trespass. Madison Police Case No. 2009-381518.

xx. On January 7, 2010, at approximately 5:48 a.m., Madison Police Officers Zulma Fanco and Wade Gummin were dispatched to the Highlander reference a disturbance and possibly a female being held hostage with a gun in Room 49. Four other

Madison Police Officers also responded to the Highlander. Upon arrival Officer Gummin stood outside Room 49 and did not hear any sign of a possible disturbance. Officer Gummin knocked on the door and was given consent to enter the room. The occupants of the room were identified as Oscar Brand, DOB 7/1958, Melvin Thomas, DOB 5/1978 and Claudette Carter, DOB 8/1955. Officer Gummin spoke with Brand and Brand said that Carter is his fiancé and that Thomas was visiting them and there had not been a disturbance in the room. Thomas also denied any disturbance. Officer Gummin observed a couple of lighters on the bed and a straightened out paper clip. Officer Gummin knows from his training and experience that a straightened out paper clip is something that can be used to clean out drug pipes. Brand said he did not know what the items were being used for. Brand gave consent to search the room. Officer Jason Baumgart observed small baggies in a dresser next to the bed and Thomas had \$600 in cash on his person. Carter was also interviewed and denied any disturbance. Brand had an active arrest warrant and was taken into custody. Madison Police Case No. 2010-5359.

yy. On January 10, 2010, at approximately 7:37 p.m., Madison Police Officers Michael Mendenhall and Alexander Boll were dispatched to the Highlander reference a 911 disconnect. Upon arrival the Officers contacted the Highlander owner, Wang, who stated that he believed there was a disturbance in Room 39 because he heard people yelling from that room. The Officers proceeded to Room 39 and made contact with the occupants, Cynthia Lewis and Lorraine Cook. Cook said that she had called 911 because Lewis was hitting her. Officer Mendenhall took Cook out in the hallway to talk to her. Cook said that she was lying in bed when Lewis kept trying to wake her up. Cook told

Lewis to leave her alone and Lewis responded that she did not have to. Cook said Lewis also threw some beer on her while she was in bed. Cook said Lewis punched her in the face two or three times with a closed fist. Officer Mendenhall did observe dried blood on Cook's nose. Lewis denied hitting Cook or pouring beer on her. Lewis said that Cook is an "insane bitch". Lewis was told that she was being placed under arrest and she struggled with the Officers as they tried to handcuff her. Lewis was arrested for Domestic Battery, Domestic Disorderly Conduct, Resisting/Obstructing A Peace Officer and a probation violation. Madison Police Case No. 2010-8887.

zz. On January 12, 2010, at approximately 2:53 p.m., several Madison Police Officers were dispatched to the Highlander reference a crime in progress involving a dangerous weapon in Room 21. Officer Molly Thomson arrived on scene and upon entering the hallway for Room 21, heard yelling and sounds of a disturbance and what sounded like a struggle. Officer Samuel Ward opened the door to Room 21 and Officer Thomson could see two black males struggling with each other. The males were identified as Lawrence Petty, DOB 6/1958 and Michael Petty, DOB 7/1979. Lawrence Petty is Michael Petty's father. There were several other adults in the room and four young children. As the Officers entered the room, they ordered the Petty's to stop the confrontation and they did. Officer Thomson spoke with several individuals who were in the room and Michael Petty said that an individual who he knows only as "Big Lord" came to the Highlander to get money that Michael owed him. Michael did not have the money and another witness, Theresa Petty, said that "Big Lord" was getting agitated and angry when Michael said he didn't have the money. Michael stated that shortly after "Big Lord" left, Lawrence Petty came into the Room yelling at Michael saying that "Big

Lord' had just pointed a gun at him and threatened to shoot him because Michael had told "Big Lord" that Lawrence had taken his money that Michael owed "Big Lord." Lawrence then became extremely agitated and began verbally arguing with Michael. Lawrence said he should throw Michael threw the window and Michael told him to try and then the two engaged in a physical altercation. Michael had a swollen and bloody lip. Lawrence told Officer Thomson that "Big Lord" confronted him in the parking lot of the Highlander and said that to Lawrence, "you don't want to get shot over \$60." Lawrence stated that "Big Lord" opened his jacket to show Lawrence a black handgun. Lawrence said that he walked away from "Big Lord" and "Big Lord" went into the motel and that was when Lawrence called 911. Lawrence Petty was arrested for Domestic Disorderly Conduct. Madison Police Case No. 2010-10474.

aaa. On January 23, 2010, at approximately 10:25 p.m., several Madison Police Officers were dispatched to the Highlander reference a disturbance and a person with a gun. Upon arrival, Officer Eugene Woehrle observed an individual later identified as Oscar Elliott, DOB 1/1975, walk out the front doors of the Highlander. Elliott had severe lacerations to the forehead above his eyes and was bleeding. Officer Woehrle contacted Elliott. Elliott identified Rickey Carson, DOB 11/1966, as the person who battered him. Officer Matthew Aures spoke with Carson who stated that he was in his room when Elliot and a female named Judy knocked on his door and asked for cigarettes. Carson said he told them to "get the fuck away from my door." Judy and Elliott responded "fuck you" and then the parties went back and forth saying "fuck you." Carson said Elliott then gave him a chest bump and Carson then pushed Elliott and Elliott came back at Carson at which time Carson punched Elliott in the face two or three times. Carson said Elliott

then pulled a knife from his waistband and cut Carson's wrist area. Carson said that after Elliott cut his wrist he ran to the BP gas station and picked up a lamp base that was sitting outside and chased Elliott with it. Judy stated that Carson "went crazy" and was punching Elliott with a closed fist and at one point Elliott fell to the ground and Carson continued kicking and punching Elliott. While Officer Aures was talking with Carson, Officer Marine Yoo asked Carson if he could search his room and Carson consented. Upon searching Carson's room, a metal crack pipe was located. The pipe had burn marks on both sides and a copper Brillo in one end. There was a metal spoon with burn marks on the bottom located next to the crack pipe. Officer Yoo also found a digital scale with white powdery residue on the measuring portion and an unused Chore Boy which Officer Yoo knows from his training and experience is used as a filter to smoke crack cocaine. All of these items were confiscated as they were drug paraphernalia. The suspect knife in the attack was located in Room 39 where Elliott went after he was beaten. Elliott was arrested for 2nd Degree Recklessly Endangering Safety and Carson was arrested for Aggravated Battery. Madison Police Case No. 2010-21169.

bbb. On January 26, 2010, at approximately 3:26 a.m., Madison Police Officer Eugene Woehrle observed a female sitting in the driver's seat of a vehicle parked and idling in the parking lot of the Highlander. The vehicle was idling for approximately 20 minutes. Officer Woehrle made contact with the occupant identified as Sharissa Jolin, DOB 9/1989. Jolin stated that her friend "Deon" had called her to come and pick him up from the Highlander. Jolin did not know "Deon's" last name. Eventually, a black male identified as Samuel Deon Wright, DOB 5/1967, exited the Highlander. Wright told Officer Woehrle that he came to the Highlander to drop off clothes for his friend "Oscar".

Wright could not remember Jolin's name. Both Jolin and Wright kept giving varying stories as to what they were doing at the Highlander. Jolin was cited for Unlawful Trespass. Madison Police Case No. 2010-23008.

ccc. On January 31, 2010, at approximately 6:25 p.m., Madison Police Officers Lindsey Ludden and Brian Shaul were dispatched to the Highlander reference an unwanted person. Upon arrival, a female, identified as Cecelia Troup, DOB 10/1966, was exiting the front door with the Highlander owner, Wang, following her and telling her to leave. Wang told Officer Ludden that Troup had come to the motel on 1/30/2010 at around 9-10 a.m. and that she had gone around knocking on doors and demanding to use the desk phone. Wang estimated he had told Troup to leave approximately 10 times in the last 24 hours. Ludden asked Wang if he had called the police prior to this and Wang stated "no." Troup stated that she was visiting Marguerite in Room 16. Officer Ludden told Troup to leave the property and Troup did. Madison Police Case No. 2010-28181.

ddd. On February 2, 2010, at approximately 2:38 a.m., Madison Police Sergeant Lori Chalecki observed a subject standing in the vestibule on the south west side of the Highlander. The subject was in the vestibule the entire time that Chalecki was on a traffic stop with Officer William Needelman. Sergeant Chalecki responded to the Highlander and made contact with the individual identified as Robert Saric, DOB 8/1956. Sergeant Chalecki observed that Saric was dressed in nice business clothes. She asked Saric if he lived at the Highlander or was staying there and Saric said that he was not. Saric stated that he was visiting "Kim". Saric did not know what room Kim was in. Saric stated that he was from California and was in Madison for a business trip and was

staying at the Candlewood Suites. Saric said that he had been at a bowling alley and then took a cab to the BP gas station on Verona Road and met “Kim” at the BP. Sergeant Chalecki asked Saric why he would come to the BP when his hotel was in Fitchburg and Saric stated, “to get a glass of milk.” Saric admitted to soliciting prostitutes. Saric said that he was married and that his wife did not have problems with his soliciting prostitutes because she “doesn’t have a choice.” Sergeant Chalecki asked Saric how much “Kim” goes for and Saric responded, “I don’t know, we didn’t get that far.” Saric was cited for Unlawful Trespass and Loitering for Purposes of Soliciting Prostitutes. Madison Police Case No. 2010-29258.

eee. On February 10, 2010, at approximately 10:57 p.m., Madison Police Officers Paul Bauman and William Needelman were on Patrol near the Highlander when Officer Bauman observed a black Dodge Intrepid drive through the parking lot and come to a stop near the front entrance. Officer Bauman observed a male exit the vehicle and go into the motel and then the vehicle parked near the front doors. Officer Bauman made contact with the male, identified as Melvin Gates, DOB 10/1990. Gates said he was a guest at the motel and that he frequently stays in Room 19 with a friend of his named Erica. He also said his aunt lives in Room 16. The owner of the Highlander, Wang, verified this information but did not know the male’s name. Gates originally gave Officer Bauman a false name and date of birth. Officer Bauman then knocked on Room 24 and asked the occupant to identify the male and she responded, “Melvin Gates.” Gates was cited for Resisting/Obstructing a Peace Officer. Madison Police Case No. 2010-31080.

fff. On February 8, 2010, at approximately 12:51 p.m., several Madison Police Officers were responding to a reported battery that had occurred at the Highlander motel

in Room 18. Dispatch advised that the suspect was waiting in the ER waiting room at St. Mary's for the victim because he had brought the victim to the hospital. Officer Sarah Mackesey arrived at the hospital and contacted the victim, Lacey Stratton, DOB 9/1977. Stratton said that she and Smith had been hanging out with friends, playing cards and watching a movie. The friends left and Stratton went to another room to visit someone. Smith then began pounding on people's doors looking for Stratton and yelling for her. Stratton said she returned to Room 18 and Smith "lost it" and "went off on me." Stratton said Smith grabbed her throat and with both hands struck her head against the door about four times and then he pushed her back against a table and she "flew over it" and landed on the floor. Smith denied having any physical contact with Stratton. Smith said that they came to the hospital to get into an anger management program. Smith was arrested for Domestic Battery. Madison Police Case No. 2010-35283.

ggg. On February 10, 2010, at approximately 6:40 p.m., Madison Police Officers and the West District Community Policing Team were working the area of the Highlander Motel. Officers observed a sport utility vehicle pull into the parking lot of the Highlander and a white male exit the vehicle. The white male, later identified as John Schurman, DOB 5/1963, was in the motel for approximately five minutes before exiting. Officer Eric Vosburg followed Schurman from the Highlander and made a traffic stop. Schurman said that he went to the Highlander to visit an acquaintance in Room 34 named Carolyn Alexis. Schurman said that he had met Alexis at Bennett's bar a month ago. Officer Vosburg asked Schurman why he was only inside the Highlander for five minutes. Schurman said that he was not there to purchase drugs, he went to see if Alexis was home and she was not. Officer Vosburg had Sergeant Chalecki check the tenant list

at the Highlander and there was no Carolyn Alexis listed for Room 34. Officer Vosburg called Room 34 and asked if there was a person residing there by the name of Carolyn Alexis and the female who answered the phone said "no." Schurman was cited for Unlawful Trespass. Madison Police Case No. 2010-37620.

hhh. On February 14, 2010, at approximately 1:51 p.m., Madison Police Officer David Wixom was conducting surveillance of the Highlander Motel. Officer Wixom observed numerous individuals going in and out of the building without using keys to get into the side doors. At 1:39 p.m., he checked the doors and the doors and doorjambs had been stuffed with paper to keep them from closing. The door on the southwest side of the building had a stick in the doorway to keep that door from closing. The items were removed so that the doors could close properly. Madison Police Case No. 2010-411194.

iii. On February 17, 2010 at approximately 3:37 p.m., Madison Police Officer Anthony Ward was dispatched to the Highlander reference a 911 disconnect. Upon arrival, Officer Ward and Officer Matthew Nordquist were contacted by a female later identified as Olivia Thompson, DOB 2/1990. Thompson said that she had gotten into a verbal altercation with Keandrew Thomas and Thomas began calling her names. Thompson said that she yelled back at him calling him names too and then Thomas punched her with a closed fist in the face. Officer Ward observed swelling on Thompson's lips and the left side of her face. Thompson said that when she told Thomas she was going to call the police, Thomas took all her money and fled out the window. Madison Police Case No. 2010-44021.

jjj. On February 20, 2010, at approximately 7:45 p.m., Madison Police Officer Edward Marshall was dispatched to a report of an unknown room at the Highlander where an individual was in possession of a large amount of narcotics and possibly a gun. The caller told dispatch that the room was to the right as one enters the motel. Officer Marshall contacted James Lewis, DOB 11/1973, in Room 33 and Lewis stated he was not familiar with any drug activity or firearms in his room. Lewis stated that he has a roommate and his roommate is having a romantic relationship with a female who's already involved with another male and Lewis suspected maybe that male made the call in order to harass his roommate. Officer Marshall discovered that Lewis had an active warrant and arrested him on the warrant and transported him to the Dane County Jail. Madison Police Case No. 2010-47087.

kkk. On February 28, 2010, at approximately 9:04 p.m., Madison Police Officer Dao Xiong was in the Highlander parking lot when he observed a white Jeep pull into the lot and then immediately turn around and exit the lot once the vehicle saw Officer Xiong's squad. Officer Xiong followed the vehicle to the BP Gas Station next door and when the driver, identified as Sergio Perez-Garduno, DOB 34/1986, exited the vehicle Officer Xiong made contact with him and asked him what he was doing at the Highlander. Perez-Garduno said that he was just driving around. Officer Xiong asked Perez-Garduno how he knew his front seat passenger and he said that he just picked her up at the PDQ on Fish Hatchery Road and that the passenger, identified as Deborah Price, had flagged him down and asked him for a ride to the west side. Officer Xiong told Perez-Garduno that he suspected that Price was a prostitute. Perez-Garduno did not confirm or deny that he was involved in soliciting a prostitute but indicated that he

understood what Officer Xiong was saying. Officer Xiong discovered that Perez-Garduno's driving status was revoked and wrote him a citation for Operation After Revocation. Price was told that Perez-Garduno would not be able to drive her anywhere. Price became extremely upset that Perez-Garduno would not be able to give her a ride. Madison Police Case No. 2010-54603.

Ill. On March 10, 2010, at approximately 3:40 p.m., Madison Police Officer Russell Pollard was dispatched to the Highlander regarding a battery complaint. Upon arrival, Officer Pollard contacted Beverly Clayton, DOB 9/1964. Clayton stated that Jimmie Smith, DOB 4/1952, came out of his room yelling, "what the fuck you do to Lacy?" while standing face to face with her. Clayton said that Smith went back into his room for about a minute and then came back out and grabbed Clayton by her right buttock. Clayton stated that while Smith was behind her he yelled at her, "yeah, call your fuckin' son and I'll kick his ass and yours too you fuckin' nigger." Clayton said she said to Smith, "I'm calling cops you fuckin' sexual assaulter." Smith told her to go ahead and he would tell them she was selling drugs. At this time, Smith was no longer on the scene. At approximately 5:38 p.m., Smith called Officer Pollard and told him that Clayton had attempted to sell him drugs and he didn't like that. Smith said that Clayton has tried to sell him drugs four or five times since last summer. Smith was cited for Disorderly Conduct. Madison Case No. 2010-63801.

mmm. On March 11, 2010, at approximately 7:54 p.m., Madison Police Officer Russell Pollard was dispatched with officer Woehrle to the Highlander regarding a male and female who had been fighting all day. Upon arrival, the Highlander owner, Wang, directed the Officers to Room 44. Officer Pollard went to Room 44 and found the door

open and the following individuals in the room: Francis Maskewit, DOB 8/1951; Denice Payson, DOB 3/1959 and James Walrath, DOB 8/1962. All three appeared to be very intoxicated. Payson said that a few days prior, Maskewit had grabbed her by the arm and it was now bruised. Payson said she didn't know why Maskewit grabbed her. Maskewit told Officer Pollard that he and Payson had been arguing and then he grabbed her arm and kept yelling at her to "shut the fuck up." Maskewit said he apologized to Payson. Maskewit was arrested for Domestic Battery and Domestic Disorderly Conduct. Madison Police Case No. 2010-65025.

nnn. On March 12, 2010, at approximately 4:18 p.m., Madison Police Sergeant Lori Chalecki was driving past the Highlander when she observed a van backed into a parking space and at least two people in the vehicle. As Sergeant Chalecki pulled into the lot, a male black, later identified as Xavier Garner, DOB 10/1980, exited the Highlander and appeared to be walking towards the suspect vehicle. As Sergeant Chalecki stopped to make contact with the vehicle, it's driver, later identified as Henry Lee, DOB 2/1962, put the vehicle in drive and began to pull forward. Sergeant Chalecki noted that Garner, who was previously walking towards the van, had made a sharp turn leading him back to the front doors of the Highlander. Sergeant Chalecki contacted the driver, Lee, and asked him if anyone in the van lived at the Highlander. After being asked three times, Lee confirmed that he did not live at the Highlander and that he was picking up "Kane" to go grocery shopping. Officer Chalecki asked Lee "Kane's" real name and Lee said he didn't know it. Sergeant Chalecki asked Lee to return to the Highlander so she could confirm with "Kane" that Lee was there for him. "Kane" came walking back out. "Kane" was identified as Xavier Garner. Garner stated that Lee was

taking him grocery shopping and held out a Wisconsin Quest card. The name on the card was not Garner's, so Sergeant Chalecki took the card. Sergeant Chalecki knows from her training and experience that Quest cards are many times given to subjects who deal drugs and the user gives the pin to the drug dealer who can purchase items from the Quest card in trade for drugs. Madison Police Case No. 2010-65792.

ooo. On March 18, 2010, at approximately 5:12 p.m., Madison Police Sergeant Lori Chalecki had received information that the occupant of Room 23 at the Highlander was in possession of and moving a variety of weapons, in particular, guns. Sergeant Chalecki and three other Madison Police Officers responded to Room 23 to make contact with the resident to determine if the information regarding the guns was accurate. After knocking for some time the door was answered by Alex Estremera, DOB 12/1964. Estremera denied having any involvement with weapons and would not allow officers to confirm the information by providing access to his room. Madison Police Report Case No. 2010-72014.

ppp. On April 10, 2010, at approximately 9:42 p.m., Madison Police Officer Stephanie Drescher was dispatched to the Highlander reference a verbal dispute between a man and his girlfriend regarding an engagement ring. Upon arrival, Officer Drescher contacted Jimmie Smith, DOB 04/1952. Smith said that he called police because his girlfriend, Lacey Stratton, stole his engagement ring and would not give it back. Smith stated that he gave Stratton the ring yesterday but wanted it back because she poured a beer on his head. Smith stated that he and Stratton got in an argument. Stratton told Officer Drescher that the two got in an argument because Smith was drunk. Stratton stated they had been at Brian's house when Brian said, "I wish I could fuck Lacey."

Smith became upset and called Stratton a “nigger lover” and a “crack head.” It was unclear who actually had possession of the ring. No further action was taken. Madison Police Case No. 2010-94477.

qqq. On April 16, 2010, at approximately 1:12 a.m., Madison Police Officer Julia Helbach was dispatched to the Highlander for two 911 disconnects from Room 34. Upon arrival, Officer Helbach knocked on the door to Room 34 and Marguerite Evans answered the door. Officer Helbach asked Evans if anyone else was in the room and Evans mumbled what Officer Helbach thought was “no.” Officer Helbach went into the bathroom, which was dark, and opened the shower curtain. Robert Fowler was sitting in the shower fully clothed. When asked why he was hiding in the shower, Fowler said that he was getting ready to take a shower. Helbach learned that it is against Fowler’s probation rules to be at the Highlander and that the owner of the Highlander, Wang, had also banned Fowler from the property on several occasions. Evans told Officer Helbach that Fowler had called 911 because he thought Evans had intentionally ruined his clothes by pouring bleach on them. Officer Helbach observed a tipped over plastic cup in the foyer by the apartment that smelled like bleach. Fowler showed Officer Helbach pair of shorts that still had the price tag on them and had bleach stains. Fowler was cited for given two citations for Unlawful Trespass since he had been on the property the night before. Madison Police Case No. 2010-98727.

rrr. On May 5, 2010, at approximately 12:09 a.m., Madison Police Sergeant Galen Wiering was conducting surveillance at the Highlander when he observed a red station wagon pull into the parking lot. Sergeant Wiering noticed the passenger side headlight was out. The vehicle stopped in front of the main entrance in the middle of the

parking lot and an unidentified black male came out and contacted the vehicle through the passenger window. After talking for a minute, the male then got into the front passenger seat. The vehicle pulled forward and made a U-turn and drove back to the front entrance of the motel and the passenger then got out of the vehicle and went back into the motel. Sergeant Wiering initiated a traffic stop on the vehicle and identified the driver as Maximillian Ledwith, DOB 6/1992. Ledwith told Sergeant Wiering that he lived nearby and was just driving around and pulled into the Highlander parking lot for no reason. He said it was a bad decision because he knows the area has a bad reputation. Ledwith said that he contacted the unidentified male so he could ask for a cigarette. Ledwith said he didn't know anyone who lived at the Highlander. While talking with Ledwith, Sergeant Wiering observed a baggie corner sitting in plain view on his backseat. Sergeant Wiering had Ledwith exit his vehicle and asked if he could search Ledwith. Ledwith consented and Sergeant Wiering did not locate any contraband. Sergeant Wiering then asked Ledwith if he could search his vehicle and Ledwith said "no." While filling out a citation for Unlawful Trespass, Officer Rose Douglas and her K9 Marty arrived on the scene. Marty conducted a drug sniff of the vehicle and a positive hit on the driver's side door handle. Sergeant Wiering then searched the vehicle and found several small baggie corners that were empty. Sergeant Wiering knows from his training and experience that baggie corners are used to package cocaine base. Madison Police Case No. 2010-119732.

sss. On May 25, 2010, at approximately 6:00 p.m., Madison Police Officer Russell Pollard was dispatched to the Highlander reference a 911 disconnect. Dispatch advised that a woman called and said, "I'm at the Highlander Motel." And a man was

heard in the background saying, "uh-oh, here we go." Upon arrival, officer Pollard walked into the front door and immediately heard yelling at the end of the hallway. The Highlander owner, Wang, was standing in the hallway outside of Room 34 and the door to Room 34 was open. There were three black females in the room and one of them said that Marguerite had just had an argument with her boyfriend but that it was smoothed over and he left. Wang told Officer Pollard that just prior to his arrival Wang had seen Fowler exit Room 34 and that Fowler has been banned from being on the premises several times. Fowler was contacted at the BP next door and denied being on the property. Madison Police Case No. 2010-14910.

ttt. On June 6, 2010, at approximately 1:42 p.m., Madison Police Officers Brian Shaul and Matthew Nordquist were dispatched to the Highlander reference a disturbance in Room 34. The Officers arrived on scene and went to Room 34 where they contacted Marguerite Evans. Evans said that she was the one who called the police because there were two males engaged in a verbal argument in her room. Evans stated that these males had since left. A check of the room revealed that there did not appear to have been a physical disturbance. Evans would not identify the individuals involved in the argument and said that it was over and they left. The Officers left the scene.

Madison Police Case No. 2010-154958.

uuu. On June 20, 2010, at approximately 10:00 p.m., Madison Police Officers were dispatched to the Highlander for a disturbance. The caller was requesting police remove a person who was refusing to leave. Upon arrival, Officer Trenton Scanlon contacted the Highlander owner, Wang, who pointed to an individual who was outside the east door with JBM Security. Wang identified the person as Robert Fowler and stated

that Fowler has been told several times that he is not allowed on the property. Wang said that Fowler keeps coming back to the property and climbing in the window of Room 34. Room 34 is where Fowler's girlfriend, Marguerite Evans lives. Fowler told Officer Scanlon that he had come over to the Highlander to get some clothing and miscellaneous toiletries that were in Evans room. Fowler requested that Officer Scanlon ask Wang for his medications that were at the front desk. Fowler said that Evans had given the medicine to Wang to hold on to. Wang produced five bottles of medications, however, none of them had Fowler's name on them so Officer Scanlon did not turn them over to Fowler. Fowler was given a citation for Unlawful Trespass. Madison Police Case No. 2010-170732.

14. Based on his training and experience, your complainant knows that buildings where narcotics trafficking occurs are often poorly maintained and managed. The building at 4353 W. Beltline Highway is poorly managed and maintained, to wit:

a. On January 4, 2010, Madison Building Code Enforcement Officer C. Michael Stahl inspected 4353 W. Beltline Highway and found six (6) building code violations contrary to certain sections of the Madison General Ordinances. Code Enforcement Officer Stahl issued an Official Notice to Highlander of Madison, Inc., Yi Chang Wang, agent, to correct the violations. (Madison Building Inspection Case No. 210005032.

b. On January 4, 2010, Madison Building Code Enforcement Officer C. Michael Stahl inspected 4353 W. Beltline Highway and found ten (10) building code violations contrary to certain sections of the Madison General Ordinances. Code

Enforcement Officer Stahl issued an Official Notice to Highlander of Madison, Inc., Yi Chang Wang, agent, to correct the violations. (Madison Building Inspection Case No. 209364012).

c. On March 12, 2010, Madison Building Code Enforcement Officer Robert Ales inspected 4353 W. Beltline Highway and found ninety-four (94) building code violations contrary to certain sections of the Madison General Ordinances. Code Enforcement Officer Ales issued an Official Notice to Highlander of Madison, Inc., Yi Chang Wang, agent, to correct the violations. (Madison Building Inspection Case No. CB2010-053-00545)

d. On June 17, 2010, Madison Building Code Enforcement Officer Robert Ales inspected 4353 W. Beltline Highway and found five (5) building code violations in Room 35, contrary to certain sections of the Madison General Ordinances, for which he issued an Official Notice to occupant John Franklin with a copy to Highlander of Madison, Inc., Yi Chang Wang, agent, to correct the violations. (Madison Building Inspection Case No. CB2010-172-03478)

e. On February 18, 2008, Madison Police Lieutenant Victor Wahl sent Highlander of Madison, Inc., Yi Chang Wang, agent, a letter informing the Highlander of a high number of police calls for service to the Highlander. The letter notes that Lieutenant Wahl had sent the Highlander several previous letters regarding the unacceptable number of police calls to the property. The letter requests the Highlander to take some steps to manage the property in a more responsible manner and invites the Highlander to schedule a meeting with the police department or call to discuss strategies to improve the property. A copy of this letter is attached as Exhibit "B".

f. On June 24, 2008, Madison Police Lieutenant Anthony Bitterman sent Defendant Highlander of Madison, Inc., Yi Chang Wang, agent, an “Official Notice Of Drug Activity” pursuant to sec. 704.17, Wis. Stats., informing the Highlander about illegal drug activity in Rooms 18 and 19 of the Highlander at 4353 W. Beltline Highway. The letter informed the Highlander of its responsibility to abate the drug nuisance.

g. On June 24, 2008, Madison Police Lieutenant Anthony Bitterman sent Defendant Highlander of Madison, Inc., Yi Chang Wang, a “Declaration of Chronic Nuisance Premises” letter informing the Highlander that due to the execution of a search warrant at the Highlander and evidence obtained of distribution and/or delivery of a controlled substance, the Madison Police Department was declaring 4353 W. Beltline Highway a Chronic Nuisance Premises.

h. On March 12, 2010, Madison Police Lieutenant David Jugovich sent Defendant Highlander of Madison Inc., Yi Chang Wang, agent, an “Official Notice of Drug Activity” letter pursuant to sec. 704.17, Wis. Stats., regarding an incident that occurred at the Highlander on February 1, 2010, in which evidence of Possession of Intent To Deliver A Controlled Substance was obtained by a Madison Police Officer. The letter informed the Highlander of its responsibility to abate the drug nuisance.

i. On March 12, 2010, Madison Police Lieutenant David Jugovich sent Defendant Highlander of Madison Inc., Yi Chang Wang, agent, an “Official Notice of Drug Activity” letter pursuant to sec. 704.17, Wis. Stats., after a search warrant was executed at the Highlander, Room 49, on March 1, 2010. The search yielded evidence of Maintaining a Drug Trafficking Place and Manufacture/Delivery of Cocaine Base. The letter informed the Highlander of its responsibility to abate the drug nuisance.

j. On April 15, 2010, Police Lieutenant David Jugovich sent Defendant Highlander of Madison Inc., Yi Chang Wang, agent, an “Official Notice of Drug Activity” letter pursuant to sec. 704.17, Wis. Stats. Regarding a search warrant that was executed at the Highlander, Rooms 45 and 46 on March 18, 2010. The search yielded evidence of Maintaining a Drug Trafficking Place (both room 45 and 46) and Delivery of Cocaine Base (room 46). The letter informed the Highlander of its responsibility to abate the drug nuisance.

15. Incidents of drug activity and disturbances continue to take place at 4353 W. Beltline Highway and the building continues to be used to facilitate the delivery, distribution and/or manufacture, as defined in sec. 961.01(6), (9), and (13), Wis. Stats., of controlled substances, as defined in sec. 961.01(4), Wis. Stat.

16. Pursuant to sec. 961.53, Wis. Stats., Violations of Chapter 961 constitute public nuisances under chapter 823 of the Wisconsin Statutes, irrespective of any criminal prosecutions which may be or are commenced based on the same acts.

17. The use of the building located at 4353 W. Beltline Highway to facilitate the delivery, distribution, and/or manufacture, as defined in Sec. 961.01(6), (9), and (13), Wis. Stats. of a controlled substance, as defined in sec. 961.01(4), Wis. Stats., and its continued use as a building where those acts take place, is a public nuisance pursuant to sec. 823.113, Wis. Stats.

18. The unreasonable activities and use of the property interferes substantially with the comfortable enjoyment of life, health and safety of others and is a public nuisance pursuant to sec. 823.02, Stats.

WHEREFORE, the City of Madison demands judgment as follows:

A. An injunction declaring 4353 W. Beltline Highway to be a public nuisance under sec. 823.113, Stats. and sec. 823.02, Stats., and permanently enjoining Defendants, The Highlander of Madison Inc. and Yi Chang Wang, from continuing, maintaining or permitting said public nuisance;

B. An injunction requiring the defendants, The Highlander of Madison, Inc. and Yi Chang Wang, to have the building located at 4353 W. Beltline Highway, Madison, Wisconsin, vacated and the property secured against illegal entry;

C. That defendants, The Highlander of Madison, Inc. and Yi Chang Wang, be permanently enjoined from conducting, maintaining, occupying or in any manner permitting the use of the property located at 4353 W. Beltline Highway, Madison, Wisconsin;

D. For an order directing the sale of the building and land known as 4353 W. Beltline Highway, Madison, Wisconsin;

E. For an order appointing a receiver to collect rents and operate the building until such time as it can be vacated and sold;

F. For costs and disbursements of this action, together with such other relief in law or equity that the Court may deem just and equitable.

STATE OF WISCONSIN)) ss.
COUNTY OF DANE)

I, Jay Lengfeld, being duly sworn on oath, state that this complaint is based on my own knowledge, except those which are stated upon information and belief, and as to such matters, I believe them to be true and they are based on reports by Madison Police Officers filed pursuant

to their official duties and based on reports from Madison Building Code Enforcement Officers filed pursuant to their official duties.

Date: June _____, 2010.

Jay Lengfeld

Subscribed and sworn to before me
this _____ day of _____, 2010.

Notary Public, Dane County, Wis.
My Commission _____