

FILED  
04-07-2020  
CIRCUIT COURT  
DANE COUNTY, WI  
2020CF000886

WLB In Custody  
Assign to Branch  
**STATE OF WISCONSIN                      CIRCUIT COURT                      DANE COUNTY**

STATE OF WISCONSIN  
Plaintiff,

vs.

ALIJAH J LARRUE  
614 E Johnson St Apt 116  
Madison, WI 53703  
DOB: 03/15/2002  
Sex/Race: M/B  
Eye Color: Brown  
Hair Color: Black  
Height: 5 ft 03 in  
Weight: 153 lbs  
Alias:

Ref. Agency: UW - Madison Police  
Department  
DA Case No.: 2020DA003558  
Assigned DA/ADA: TYPIST \_  
Agency Case No.: UWPD 20-475  
Court Case No.:  
ATN: 13086500316025

*For Official Use*

KHARI O SANFORD  
NPA  
UNK, WI  
DOB: 05/22/2001  
Sex/Race: M/B  
Eye Color: Brown  
Hair Color: Black  
Height: 5 ft 9 in  
Weight: 150 lbs  
Alias:

Court Case No.:  
ATN: 13086500315811

**CRIMINAL COMPLAINT**

Defendants,

**The below-named complaining witness being first duly sworn states the following:**

**Count 1: FIRST DEGREE INTENTIONAL HOMICIDE - PTAC, USE OF A DANGEROUS WEAPON (As to defendant Khari O Sanford)**

The above-named defendant on or about Monday, March 30, 2020, in the City of Madison, Dane County, Wisconsin, as a party to a crime, did cause the death of Robin Carre, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.05, 939.63(1)(b) Wis. Stats., a Class A Felony, and upon conviction shall be sentenced to imprisonment for life.

And further, invoking the provisions of sec. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

**Count 2: FIRST DEGREE INTENTIONAL HOMICIDE - PTAC, USE OF A DANGEROUS WEAPON (As to defendant Khari O Sanford)**

The above-named defendant on or about Monday, March 30, 2020, in the City of Madison, Dane County, Wisconsin, as a party to a crime, did cause the death of Beth Potter, with intent

STATE OF WISCONSIN - VS - Khari O Sanford, Alijah J Larrue

to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.05, 939.63(1)(b) Wis. Stats., a Class A Felony, and upon conviction shall be sentenced to imprisonment for life.

And further, invoking the provisions of sec. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

**Count 3: FIRST DEGREE INTENTIONAL HOMICIDE - PTAC** (As to defendant Alijah J Larrue)

The above-named defendant on or about Monday, March 30, 2020, in the City of Madison, Dane County, Wisconsin, as a party to a crime, did cause the death of Robin Carre, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.05 Wis. Stats., a Class A Felony, and upon conviction shall be sentenced to imprisonment for life.

**Count 4: FIRST DEGREE INTENTIONAL HOMICIDE - PTAC** (As to defendant Alijah J Larrue)

The above-named defendant on or about Monday, March 30, 2020, in the City of Madison, Dane County, Wisconsin, as a party to a crime, did cause the death of Beth Potter, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.05 Wis. Stats., a Class A Felony, and upon conviction shall be sentenced to imprisonment for life.

## **FACTS:**

Your complainant is a Court Officer for the University of Wisconsin Police Department and, for this complaint, is relying on information provided by Detectives Peter Grimyser, Jamie Grann, Andrew Nielsen, Glenn Davis, Matthew Schirmacher, and Kyle Van Haren; Special Agents Kenneth Folkers and Marshall Ogren; Sergeant Daniel Burgoni; and Officers Dustin Pailing, Vinson Mulvey, and Derek Austin, all of whom your Complainant believes to be truthful and reliable because they are sworn law enforcement officers.

## **DISCOVERY OF VICTIMS AND INITIAL INVESTIGATION**

On March 31, 2020 at 6:28AM, University of Wisconsin-Madison Police Officers and City of Madison Police Officers were dispatched to the University of Wisconsin Arboretum in the City of Madison, Dane County, Wisconsin, in area located south and west of the intersection of Arboretum Drive and North Wingra Drive, in reference to a report from two separate joggers, AB and HL, that there were two human bodies lying just off the shoulder of the roadway and were covered in blood.

City of Madison Police Officer Dustin Pailing responded to the Arboretum at approximately 6:41AM on March 31 and found paramedics on scene. Officer Pailing reports paramedics advised the female victim was showing some signs of life and was subsequently transported to the University of Wisconsin Hospital. Officer Pailing accompanied the female victim to the hospital and noted that she was wearing pajamas and socks, yet, no shoes. Officer Pailing noted the temperature to be approximately 30 degrees. UW Detective Andrew Nielsen reports

STATE OF WISCONSIN - VS - Khari O Sanford, Alijah J Larrue

that he responded to the UW Hospital. Detective Nielsen reports the female was pronounced deceased by Dr. Angela Ingraham at the University of Wisconsin-Hospital at 7:54AM.

Upon responding to the scene, UW Detective Peter Grimyser, observed the male victim to be laying facedown several feet south of the road with an obvious wound to the head. Detective Grimyser observed the male subject to be wearing only his underwear for clothing. Detective Grimyser observed several spent .357 SIG shell casings in the area immediately around the male victim and where the female victim had been located. Detective Grimyser also observed blood spatter and pooling indicating a likelihood that the victims had been shot at that location. On March 31, Detective Peter Grimyser spoke with a woman who lived near the Arboretum, KR, who reported that she had been using an electric device between 11:02PM and 11:12PM on 03/30/2020. She heard what she believed were two gunshots a pause for 5 seconds and then 4-5 more gunshots coming from the direction of the Arboretum in that time period.

### **AUTOPSY AND INJURIES SUSTAINED BY VICTIMS**

On April 1, Dane County Chief Medical Examiner Dr. Vincent Tranchida, M.D., a forensic pathologist, conducted an autopsy of the male victim found in the Arboretum on the previous day. Dr. Tranchida identified the male victim as Robin Carre. After conducting the autopsy, Dr. Tranchida reported to Detective Nielsen that Robin Carre died of homicidal violence, specifically a gunshot wound into the left side of the head near the ear. Dr. Tranchida reported the gunshot appeared to be fired from close range.

On April 1, 2020, Deputy Chief Dane County Medical Examiner Dr. Agnieszka Rogalska, M.D., a forensic pathologist conducted an autopsy of the female victim found in the Arboretum on the previous day. Dr. Rogalska identified the female victim as Beth Potter. After conducting the autopsy, Dr. Rogalska reported to Detective Nielsen that Beth Potter died of homicidal violence, specifically gunshot wounds. Dr. Rogalska noted gunshot wound(s) to the back of the head and to the upper arm.

### **REPORTS OF TROUBLED RELATIONSHIP**

Detective Nielsen later spoke with LG who is a friend of Beth Potter. LG advised she and Beth Potter took a walk together on March 30 at approximately 5:30 to 6:00 PM. LG advised they talked about work and talked about Beth Potter's daughter, Miriam Potter Carre and her boyfriend Khari Sanford. LG said Beth Potter told her that her and her husband (Robin Carre) had just moved them out of their house and into an Air BNB. LG advised the reason for moving Miriam and her boyfriend Khari Sanford out was that they were not following Beth Potter's and Robin Carre's social distancing rules due to concerns on the Coronavirus. LG stated Beth Potter had said her daughter and daughter's boyfriend instead were going off on their own and not staying in the house. LG reports that Beth Potter had told her that her daughter was saying things as they were moving out such as, "You don't care about me" and "You don't talk to me". LG said Beth Potter had described Khari Sanford as having been quieter during the move. LG said according to Beth Potter, Miriam and Khari Sanford literally sat in her bedroom all the time and ordered food and didn't really communicate with Beth Potter. LG thought more bad stuff was going on but Beth Potter didn't tell her. LG said Beth Potter doesn't usually get frustrated, but was clearly frustrated during their conversation.

STATE OF WISCONSIN - VS - Khari O Sanford, Alijah J Larrue

Detective Nielsen conducted an interview of NK who was Beth Potter's supervisor at University of Wisconsin Hospital and Clinics. NK advised Beth Potter had told her previously that her daughter, Miriam Potter Carre, and her boyfriend, Khari Sanford, were not respectful to her. NK knew that Beth Potter's medication put her at greater risk of infection and she had a need for social distancing and that was why they moved Miriam and Khari to an Air BNB rather than letting them continue to reside in the family home. NK stated Beth Potter had expressed to her bad feelings about Khari Sanford. NK advised Beth was usually very calm, but lately had been acting stressed and not like herself.

## **MIRIAM POTTER CARRE'S INTERVIEW WITH POLICE AND UNTRUTHFUL STATEMENTS**

On March 31, City of Madison Police Detective Jamie Grann and Detective Grimyser conducted an interview of Miriam who was identified verbally, at the University of Wisconsin Police Department station. Miriam stated to Detectives Grann and Grimyser that her adoptive parents, Beth Potter and Robin Carre, had rented her an Air BNB unit at 213 Sunny Meade Lane, City of Madison, Dane County, Wisconsin, for the past 2-1/2 weeks while she looked for a permanent apartment. She told Detective Grimyser that her parents did this because she did not want to self-quarantine due to the coronavirus outbreak. Miriam reported that her father had been self-quarantining himself for the past several weeks. She also mentioned that her mother was a doctor who worked at the University of Wisconsin Hospital and Clinics assisting with the Coronavirus outbreak. Miriam said her boyfriend who she identified as Khari Sanford had been living with her at her current temporary residence and he had also been staying at her parents' residence for two weeks prior to her moving out. Miriam said that she loved her boyfriend, and she was extremely loyal to him.

Miriam told Detective Grann that her parents had allowed her to use their Volkswagen minivan for the past two weeks since she had moved out of their home. A check of Wisconsin Department of Transportation records, kept in the regular course of that agency's official duties, revealed Robin Carre had a white, 2012, Volkswagen, Routan SE Van, VIN: #2C4RVABG5CR355197 with Wisconsin registration: WI/PC/769GMG registered in his name (Photo 1). This vehicle was observed by UWPD Sergeant Daniel Burgoni parked behind 213 Sunny Meade Lane on March 31.



Detective Grimyser reports that Miriam stated that she was with Khari Sanford the entire night of March 30 through the morning of March 31 and that neither of them had left the Air BNB after approximately 10:15PM. Miriam said she and Sanford had spent the evening watching the movie Hangover 2 prior to going to sleep for the evening while together in the Air BNB at Sunny Meade Lane. Detective Grann and Detective Grimyser report that they confirmed, several times, Miriam's statement that neither she nor Khari had left the Sunny Meade residence the evening of March 30, 2020 after approximately 10:15 PM and that the White VW minivan was with them at the Sunny Meade address.

STATE OF WISCONSIN - VS - Khari O Sanford, Alijah J Larrue

City of Madison Detective Glenn Davis later reviewed City of Madison traffic cameras, whose video is kept in the regular course of the City of Madison's operations, and noted late in the evening on March 30 and early morning hours of March 31 that a vehicle matching the description of the victim's vehicle had been observed numerous times in the area of the victims' residence, University of Wisconsin campus and South Park Street. Detective Grann reviewed photographs of the White VW minivan and compared them to the camera footage collected by Detective Davis showing a similar van near the Arboretum and the victims' residence during that time period. Detective Grann notes that the van had a unique combination of five bumper stickers on the rear hatch including a large, yellow bumper sticker on the driver side rear hatch (See Photo 1 of van taken by police during a search of the van). The white van depicted in the street camera videos contains the identical unique bumper sticker configuration as the van in Miriam's possession the night of the homicide (See Photo 2 showing the van at Park and W. Washington at 12:19AM on March 31).



A forensic search of Miriam's cellular telephone was conducted by UWPD Detective Matt Schirmacher, a trained digital forensic analyst, on April 2, 2020. Detective Schirmacher's search was able to recover call logs and messaging data from late in the evening on March 30 and into the early morning hours of March 31. Relevant data from that analysis contradicted Miriam's statement that she was with Khari Sanford and in possession of the white van for the entire evening of March 30. A selection of the relevant messages include:

March 30, 2020:

9:48PM- Missed call from Miriam to contact "Khari Sanford"

9:50PM- Sent a text to contact "SD:" "He didn't pick up"

11:02:47PM- Sent a text to Khari Sanford: "At least bring back the car and have someone get you from here. I don't feel safe here".

11:13:00PM- Sent a text to Khari Sanford: "Why would you put me in this position..."

11:19:14PM- Sent a text to SD: "I hear him I think tho"

11:19:18PM- Sent a text to SD: "Like I think he just pulled up".

11:19:20PM- Sent a text to SD: "Like w someone".

11:19:30PM- Sent a text to SD: "But yes its him".

11:19:30PM- Sent a text to SD: "But yes its him".



STATE OF WISCONSIN - VS - Khari O Sanford, Alijah J Larrue

11:22:00PM- Sent a text to SD: "It's Huncho"

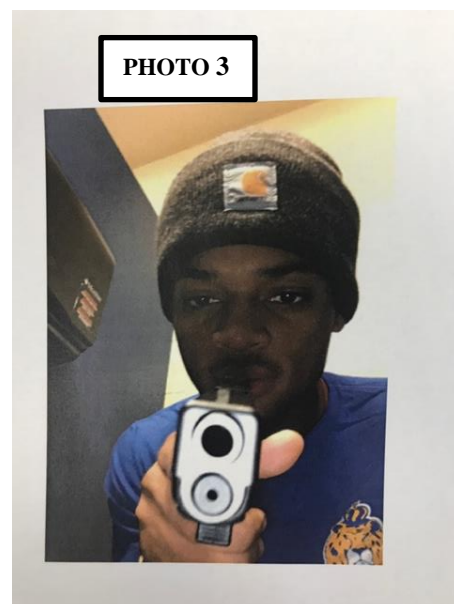
11:22:07PM- Sent a text to SD: "His friend got into a situation".

11:26:37PM- Sent a text to SD, "I wanna cry rn but I'm also in a apartment w them and it's literally 2 and a half rooms so that is fun".

### **REPORTS OF RECENT DISCUSSION OF VICTIMS' MONEY AND ACCESS TO FIREARMS**

On April 4, Wisconsin Department of Justice Special Agent Kenneth Folkers conducted an interview of DF who was identified verbally. DF indicated that he was friends with both Miriam Potter Carre and Khari Sanford and a classmate at Madison West High School. DF told Agent Folkers that he overheard a discussion between Miriam and Khari in a ceramics class at West High School shortly before school was canceled in March 2020 during which Miriam discussed with Khari the idea of how they could get money. DF reported hearing Miriam tell Khari Sanford that her parents had "bands" of money and that they were rich. DF reported that "bands" likely meant thousands of dollars in cash.

A forensic search conducted by Det. Schirmacher of Miriam's cellular telephone also revealed that on March 8 a photo of Khari Sanford pointing what your Complainant believes to be a Glock handgun at the camera was sent from Miriam's cell phone to Khari's cell phone which matches a photograph sent from Khari to Miriam on November 22, 2019. (Photo 3).



### **IDENTIFICATION OF SECOND SUSPECT- ALIJAH LARRUE**

On April 3, Wisconsin Department of Justice Special Agents Marshall Ogren and Folkers interviewed with Alijah Larrue (who is reported by DF to go by the nickname "Huncho"). DF reported to Agent Folkers that Khari Sanford informed him that "Huncho" was with him the night of March 30. During the course of that interview detectives obtained verbal consent from Larrue to take and have a digital forensic examination done of his phone.

UWPD Detective Kyle Van Haren, a trained digital forensic analyst, was able to extract GPS location data stored on the device that would indicate where the device was on a specific dates and times. When reviewing that data, Detective Van Haren observed that the device had GPS coordinates placing it in locations and times of interest in the investigation. Those times and locations include:

March 30, 2019

- Prior to approximately 9:30 PM Larrue's phone plots in the area of his own residence located at 614 E. Johnson Street, City of Madison.

STATE OF WISCONSIN - VS - Khari O Sanford, Alijah J Larrue

- After 9:30 PM Larrue's phone plots multiple locations over a short period of time indicating movement in a vehicle and the direction of travel is westbound in the area of East Gorham Street. as it turns into University Avenue and then south in the area of Highland Avenue near Madison West High School located at 30 Ash Street and then in the area of Rowley Avenue.
- From approximately 9:40 PM until 10:40 PM Larrue's phone's GPS plots at multiple locations in the area approximately outlined by the roads on and west of Breese Terrace, north of Monroe Street, south of University Avenue, and east of Farley Ave indicating travel in a vehicle around the neighborhood. This include multiple driving's-by on Rowley Avenue in the area of 2212 Rowley Avenue. The residence of Beth Potter and Robin Carre.
- The times of travel past the Potter-Carre Residence is as follows: 9:43 PM (eastbound), 9:53 PM (westbound), (9:59 PM eastbound turning northbound on South Allen Street), 10:05 (eastbound).
- From approximately 10:40 PM until 10:52 PM Larrue's phone's GPS plots multiple points in the area of 2212 Rowley Avenue, the residence of Beth Potter and Robin Carre.
- Approximately 10:53 PM Larrue's phone's GPS plots additional points at locations and times indicating movement in a vehicle turning northbound on South Allen Street. and then circling back around heading southbound past Edgewood College on Edgewood Avenue.
- At approximately 10:57 PM Larrue's phone's GPS plots near the intersection of North Wingra Drive and Vilas Park Drive near the entrance to the Arboretum.
- At approximately 11:02 PM Larrue's phone's GPS plots in the area of the intersection of Covall Street and Balden Street off Arboretum Drive. The most direct route between those two points is Arboretum Drive which is the road where Beth Potter and Robin Carre were located.
- Additional GPS Points plot on Larrue's phone indicate circling around the area of the Arboretum in the neighborhood just south of the Arboretum between Carver Street and Martin Street along Fish Hatchery Road and North Wingra Drive with an additional GPS Plot Point on near the Wingra Drive entrance to the Arboretum at 11:06 PM
- At approximately 11:12 PM Larrue's phone's GPS plots points again just south of the Arboretum and indicates movement in a vehicle eastbound towards the Villager Shopping Center near the intersection of Ridgewood Way and South Park Street at 11:15 PM.
- At approximately 11:16 PM Larrue's phone's GPS plots points eastbound along Bram Street and southbound into the neighborhood east of Sundstrom Street
- At approximately 11:20 PM Larrue's phone's GPS plots multiple points in the area of 213 Sunny Meade Lane.
- From approximately 11:20 PM to 12:00 AM on March 31, Larrue's phone's GPS plots multiple points in the area of 213 Sunny Meade Lane and slow movement in the nearby vicinity.
- At approximately 12:02 AM Larrue's phone's GPS plots points indicating movement in a vehicle traveling back northbound along Sundstrom Street and westbound along Bram Street to northbound on South Park Street to eastbound on West Washington Avenue to northbound on North Broom Street to Westbound on West Johnson Street as it turns into East Johnson Street.
- At approximately 12:10 AM Larrue's phone's GPS plots points in the area of 614 East Johnson Street and remains in that area for numerous hours.

STATE OF WISCONSIN - VS - Khari O Sanford, Alijah J Larrue

### **COMMUNITY PROVIDED VIDEO**

On April 3, 2020 ER, a private citizen and an employee of a school and church located at 2121 Rowley Avenue came to the UW-Madison Police Department and provided surveillance video of the church, kept by the church in the regular course of its business. The church and its school have exterior surveillance cameras. Detective Van Haren spoke with ER who advised after hearing about the homicide and the general request for information requested their Network and Systems Administrator IT to export their surveillance video. ER verbally advised he consent for UWPD to review the video that he freely provided for investigative leads. The church is approximately 1 block east of 2212 Rowley Avenue the residence of Robin Carre and Beth Potter. Detective Van Haren reviewed the surveillance footage and observed a white van consistent with the van registered to Robin Carre traveling on Rowley Avenue past the Potter-Carre Residence multiple times as follows: 9:43 PM (eastbound), 9:53 PM (westbound), (9:59 PM eastbound turning northbound on South Allen Street), 10:05 (eastbound). Detective Van Haren also observed at approximately 10:53 PM headlights of a vehicle turning north at the intersection from traveling eastbound on Rowley Avenue. This footage of the movements of the van were consistent with the dates and times of the GPS coordinates of Alijah Larrue's phone. During this time there was very little traffic and the vehicle was the only one observed on the footage during those time periods.

### **UW CAMPUS SURVEILLANCE VIDEO**

Detective Nielsen reviewed surveillance footage from the UWPD Milestone Camera System of areas around campus. This video is kept in the regular course of the UWPD's official duties. On multiple different camera's and locations he observed a white van consistent with the van registered to Robin Carre traveling on streets in and around campus that were consistent with the GPS coordinates placing Larrue's cell phone at various locations and times.

### **KHARI SANFORD CONFESSES TO DF**

During an April 4 interview of citizen witness DF, DF told Agent Folkers that on March 31, Khari had stopped by his house and appeared somewhat excited and frantic. DF describes Khari as pacing around the room and sweating. DF reports that Khari Sanford made a phone call to Larrue that he could overhear. DF reports that Khari Sanford said to Larrue that he had heard on the social media that one of the victims in the Arboretum shooting was in the hospital and possibly alive. DF reports that Khari Sanford said "I swear I hit them, how did they survive" and was excessively sweating. DF reports that Sanford made statements on the phone indicating he was scared that a victim could have survived that would implicate him in the homicide

DF reports to Agent Folkers that Khari Sanford then got off the phone and told him that he had shot the people in the Arboretum. DF reports that Sanford said he had shot them in the "back of the head." DF reports that Sanford told him that Larrue was with him during the shooting.

Detective Grimyser is aware that at as of April 4 when this interview was conducted, the only publicly released information concerning the victims' injuries was that they had died of "homicidal violence," The information that the victims were shot in the head, while accurate, was not publicly released at this time.



STATE OF WISCONSIN - VS - Khari O Sanford, Alijah J Larrue

DF reports that Sanford asked him to assist in hiding the gun. DF refused to assist.

### **SANFORD AND LARRUE'S ATTEMPT TO DESTROY AND HIDE EVIDENCE**

On April 5, UWPD Officer Vinson Mulvey made contact with a citizen witness, NS, who lives next to the Air BNB on Sunny Meade Lane where Miriam Potter Carre and Khari Sanford were residing the night of March 30 to March 31. NS believed they may have surveillance video of the two suspects returning to the Sunny Meade Air BNB following the murder of Beth Potter and Robin Carre. NS reports that his video shows a white van entering the neighborhood the night of March 30, two individuals walk out of the van and those individuals throwing items into the woods south of NS's property.

On April 5, law enforcement officers searched the woods near the Sunny Meade Air BNB and citizen witness NS's property. UWPD Officer Derek Austin located a crumpled up piece of mail addressed to Beth Potter at her Rowley Avenue address and a cell phone that appears to have been purposefully broken.

Your Complainant believes the information furnished by Dr. Ingraham, Dr. Tranchida, and Dr. Rogalska to be truthful and reliable because they are experts in their field and are citizen informants.

**\*\*THIS COMPLAINT IS BASED ON** the information and belief of your complainant, who is a Court Officers for the University of Madison Police Department, and who learned of the above offense from the reports of University of Madison Police Officer(s) Detectives Peter Grimyser, Jamie Grann, Andrew Nielsen, Glenn Davis, Matthew Schirmacher, and Kyle Van Haren; Special Agents Kenneth Folkers and Marshall Ogren; Sergeant Daniel Burgoni; and Officers Dustin Pailing, Vinson Mulvey, and Derek Austin,, which report(s) your complainant believes to be truthful and reliable inasmuch as they were prepared during the course of the officer(s) official duties.

Your Complainant believes the information furnished by AB, HL, LG, NK, DF, ER, and NS to be truthful and reliable because they are citizen informants.

Your Complainant believes the information provided by Miriam Potter Carre to be reliable to the extent it is against her interests.

STATE OF WISCONSIN - VS - Khari O Sanford, Alijah J Larrue

Subscribed and sworn to before me on  
04/07/20

Electronically Signed By:  
Matthew Moeser  
Deputy District Attorney  
State Bar #: 1034198

Electronically Signed By:  
Peter Grimyser  
Complainant