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CIRCUIT COURT
DANE COUNTY, WI
2022CF003134

JSL IA 12/5/2022 @ 1:30PM
Assign to Branch

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

STATE OF WISCONSIN
Plaintiff,

vs.

RAJNAL REHMAT
623 Jefferson St
De Forest, WI 53532
DOB: 11/15/1991
Sex/Race: M/W
Eye Color: Brown
Hair Color: Black
Height: 5 ft 11 in
Weight: 154 lbs
Alias:

Ref. Agency: DeForest Police Department
DA Case No.: 2022DA011011
Assigned DA/ADA:
Agency Case No.: 2022-00483619

Court Case No.: 2022CF _____
ATN: 13676500649175

For Official Use

CRIMINAL COMPLAINT

Defendant,

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

Count 1: CHILD ENTICEMENT

The above-named defendant on or between September 5, 2022 and October 1, 2022, in the Village of DeForest, Dane County, Wisconsin, with intent to have sexual contact with the child in violation of Section 948.095, Wis. Stats., did cause a child, CHILD VICTIM 1, DOB 07/20/2005, who had not attained the age of 18 years to go into a vehicle, contrary to sec. 948.07(1), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

Count 2: SEXUAL ASSAULT OF A CHILD BY A PERSON WHO WORKS OR VOLUNTEERS WITH CHILDREN

The above-named defendant on or between September 5, 2022 and October 1, 2022, in the Village of DeForest, Dane County, Wisconsin, did have sexual contact with CHILD VICTIM 1, DOB 07/20/2005, a child who had attained the age of sixteen, and is not the defendant's spouse, and with whom said defendant works or interacts through that occupation or volunteer position, contrary to sec. 948.095(3)(a), 939.50(3)(h) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

FACTS:

Your complainant is a Court Officer with the DeForest Police Department and for this complaint is relying on the written police report(s) submitted by DeForest Detective Ben Larson.

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Detective Larson reports on November 28, 2022 in the afternoon of his shift, he received a Child Protective Services report from Dane County Human Services (DCHS). This report was from an anonymous reporter who received information from a 17-year-old male. This male received information from his 17-year-old female friend (alleged victim) who wished to remain anonymous as well. The victim had told him she had been inappropriately touched and sent inappropriate text messages from an adult male. The female is very upset of this happening to her as Rajnal (later fully identified as **RAJNAL REHMAT**, the defendant hereinafter) is supposed to be "a holy man."

The alleged perpetrator was identified in the report as Brother Rajnal Rehmat (the defendant) who goes by the name of "Reggie." The defendant is a seminarian who lives in Saint Francis (WI) during the week and during the weekend, lives at an identified parish in DeForest (WI), Dane County, Wisconsin. Through investigation, those familiar with the defendant do reference him by the name Reggie.

Detective Larson conducted an open search through Wisconsin Department of Transportation records which showed one result for the defendant. WI DOT records showed the defendant had a date of birth of 11/15/1991 and an address listed in the 600 block of Jefferson St in Village of DeForest, Dane County, Wisconsin. Detective Larson knows from past experience this is the address of the identified parish (residence).

Detective Larson made contact with a witness, whose name forms the initials CJG. CJG was alerted by the voicemail there were allegations of possible sexual abuse by a member of the Diocese, with the information being divulged from a friend of the victim. CJG knew the allegations were against a Seminarian who was placed at the identified parish in DeForest with the victim's identity unknown. CJG provided Detective Larson with the phone number for an individual whose name forms the initials DXL who she said would possibly know more information.

Detective Larson called and spoke with DXL. DXL said he is the Special Assistant to the Bishop for the Diocese and said he was aware there had been allegations brought forward. DXL said the defendant had been placed on administrative leave this date.

DXL told Detective Larson there were some sanctions placed on the defendant this date which included the defendant to have no contact with minors, not to stay overnight at any other place than the identified parish's rectory, turn in his cell phone at night to the identified parish's Priest and to have no contact with a specific juvenile female.

Detective Larson called and spoke with the identified parish's Priest, whose name forms the initials JJH. JJH was aware of the allegations and confirmed he had placed sanctions on the defendant during the investigation, including him being placed on administrative leave. JJH clarified the defendant is not to have any participation with the church activities, no contact with minors, not to attend the Seminary during the week, stay at the rectory and to turn his cell phones over to JJH at night. JJH said the defendant has a phone from the United States and also has his cell phone which he brought from Pakistan.

On November 28m, 2022, Detective Larson went to the defendant's residence and spoke with him. The defendant verbally identified himself to Detective Larson. The defendant stated he

had another cell phone, but it did not work in the U.S. as it was a phone he had brought from Pakistan.

Detective Larson asked the defendant if he knew who the allegations involved with him saying he did not know initially, but today he received a message from JJH that he was not to have contact with minor, stay inside the residence and also not to have contact with a female, whose name forms the initials CHILD VICTIM 1 (DOB: 7/20/2005). The defendant said CHILD VICTIM 1 is a parishioner and he knows her family. The defendant said he knows CHILD VICTIM 1 is 17 years old and she has a mother, father and believed she had 4 older siblings.

The defendant said he has had contact with CHILD VICTIM 1 directly and they have had each other's phone numbers.

Detective Larson asked the defendant about any time he had spent alone with CHILD VICTIM 1. The defendant said he conducts a Bible Study program in the identified parish center Friday mornings, which she would participate in.

The defendant said he believed there were 3-4 times when he was alone with CHILD VICTIM 1. The defendant said one time he went to a park in DeForest with CHILD VICTIM 1, which he said was close by but he was unsure which park it was.

The defendant said one time he was alone with CHILD VICTIM 1 was when she went to a party in DeForest somewhere and she came to visit him after the party.

The defendant said "I was aware of her age, that she's a minor, she's 17."

The defendant said he was aware he should not get involved or close with minors, including "no touching."

Detective Larson asked the defendant about allegations of inappropriate touching between himself and CHILD VICTIM 1. The defendant said he didn't know exactly what a bad touch was, but said he knew what a sexual touch was. Detective Larson asked the defendant about touching any private areas, which the defendant said even in his culture, they should not touch private parts of another without permission. The defendant said he did not think there was any inappropriate touching from his side. Detective Larson asked if CHILD VICTIM 1 had inappropriately touched him at all, with him saying no he didn't think so. The defendant said they were sitting together in the car, with her next to him, where they had touched.

The defendant said he did have CHILD VICTIM's number and she had sent him messages in the past.

Detective Larson asked the defendant if he would give him consent to search his cell phone, involving the extraction of data, to see if there are any items of evidence in relation to the allegations. The defendant agreed to this and Detective Larson completed a Consent to Search form for the Samsung Galaxy S8 cell phone.

Detective Larson then asked the defendant if he used his Pakistan phone for internet, which he said he did. Detective Larson asked if he would give him consent to search that phone as well. The defendant said if Detective Larson was only talking about CHILD VICTIM 1 he would

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happily give consent, but if Detective Larson was wanting to look at other things he may be hesitant.

The defendant said he uses WhatsApp or email for this phone to contact people back in Pakistan. The defendant stated he did have contacts with CHILD VICTIM 1 on this international phone, which would be messages through WhatsApp. The defendant said he gave this international phone number also to CHILD VICTIM 1 for his WhatsApp platform. The defendant showed Detective Larson he had "[CHILD VICTIM 1]" in his WhatsApp contacts. The defendant asked Detective Larson what improper conversation would be, asking if sending sexual pictures would be inappropriate which Detective Larson told him that would be considered inappropriate.

Detective Larson completed the consent to search form for his international phone and the defendant signed it.

Detective Larson asked the defendant if there was anything else he would like to tell him before Detective Larson left, where he said he would be happy to tell Detective Larson certain things. The defendant said if he has never asked a girl or minor to send him pictures or be nude in from of him and it is not proven he has sent messages like that, then it was ok and asked if it was fine. Detective Larson told him messages or images were only a piece of the puzzle for an investigation. Detective Larson told him if there was anything he should know about, he would rather him be honest with him now. The defendant thought for a moment, saying hmmm a couple of times and said "yeah well." Officer Loughran clarified he previously asked what inappropriate was. The defendant said that information could be told by the girl and her family. Detective Larson told the defendant if he could think of anything later on, he could talk with him. The defendant said he needs some time to think and reflect especially as he did not expect Detective Larson to come speak with him. The defendant said they could do that later, saying there are certain things which should be told, which he is not telling or has not told.

On November 30, 2022, Detective Larson made contact with CHILD VICTIM 1 to gain any information about this information involving her. CHILD VICTIM 1 confirmed the 17 year old female referenced in the Dane County Human Services report was in fact about her and confirmed there were both physical and digital media contact between the defendant and herself.

CHILD VICTIM 1 reported the following: The defendant was a Brother at the identified parish in DeForest WI, meaning he was a priest in training who she referred to him with his nickname "Reggie." The defendant and the two other priests at the identified parish also preside over the church she attends with her family, which is a church in East Bristol in Dane County WI. She participates in religious activities at both identified parishes. Child Victim 1. The defendant came to the parish around June 2022, was 31 years old and was from Pakistan. He has a vehicle, which she described as a black, compact, 5 seat SUV which had a brand name that started with the letter "H."

CHILD VICTIM 1 said the defendant came to her church in June or July and that was how she first met him. She got the defendant's number when she wanted to send him pictures from a camp she attended.

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CHILD VICTIM 1 said the defendant told her that JJH (lead pastor at the identified parish) told him he should not text minors, but they had both been texting each other for a few weeks already. She suggested they add someone else to the text chat, but that never happened and they kept messaging between themselves. The defendant told CHILD VICTIM 1 not to tell JJH or anyone they were friends because he was not allowed to be friends with a minor.

CHILD VICTIM 1 said as they began messaging, it was innocent and explained there was nothing explicitly wrong. CHILD VICTIM 1 was not sure when the switching point was, where the defendant began getting her to "do more stuff," but described it as progressively more awkward. CHILD VICTIM 1 explained he would ask to see her room or ask if her parents were home.

CHILD VICTIM 1 said there are times where friends will share sexual stories or talk about sexual things with each other, so it started with things like that with the defendant.

CHILD VICTIM 1 said there was one point she was working out and told him she had a "4 pack" on her stomach, where he asked to see her stomach for motivation to work out. So CHILD VICTIM 1 lifted her shirt a little and took a mirror picture which she sent to him.

On August 28, 2022, CHILD VICTIM 1 wanted to meet with the defendant to give him some peaches from her family so they decided to meet up at a park and walk around, which seemed normal. They met up at Western Green Park (Village of DeForest, Dane County, Wisconsin) and they walked together. They talked about his past, telling her about his past and sneaking out of the Seminary and his girlfriends. The defendant also told her how beautiful she was and she looked good, motioning towards her chest as she wore a tank top. The defendant said any guy would be lucky to have you. CHILD VICTIM 1 said the defendant took her picture on one of the bridges at the park. CHILD VICTIM 1 said it wasn't overtly weird until the end, where he told her he never picks a girl from his church and she was going to be the first one.

As they were walking back to their cars, the defendant told her he had quick urge and asked if he could express it. CHILD VICTIM 1 told him it depended on what the urge was, questioning in her mind what he wanted to do. CHILD VICTIM 1 said the defendant grabbed her and kissed her cheek. CHILD VICTIM 1 flinched and pulled away from him, laughing which is what she does when she gets nervous. CHILD VICTIM 1 said the defendant did give her a long hug before he had kissed her cheek.

The defendant asked CHILD VICTIM 1 if her windows were tinted and wanted to spend time in her car, saying he didn't want people to see in the car.

CHILD VICTIM 1 said she audio recorded their interactions together at Western Green Park because she had a thought in her head, if he did something to her she wanted it recorded and it was a safety precaution for her.

CHILD VICTIM 1 said the next time they met at a park was September 5, 2022 and she audio recorded this contact with him as well. CHILD VICTIM 1 said this meeting was at Warner Park located in the 2900 block of N. Sherman Ave, City of Madison, Dane County, Wisconsin.

CHILD VICTIM 1 said as they walked in the park, the defendant would ask her questions about her sexual life. CHILD VICTIM 1 told him about her past sexual relations with her boyfriends or

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girlfriends when asked, giving an example of things she did with her ex-girlfriend with the defendant telling her he liked watching girl on girl but not boy on boy. The defendant also asked her things such as what she has done with guys, asking what she liked to do with guys or what size "dick" she liked. CHILD VICTIM 1 said that continued with the defendant even though she thought it was weird. CHILD VICTIM 1 said the defendant would also ask her sexual questions, such as asking her if she liked "sucking."

Detective Larson asked CHILD VICTIM 1 about the DCHS report writing about inappropriate touching. CHILD VICTIM 1 said when she met with the defendant at the Madison park, there was a certain time she needed to leave by. CHILD VICTIM 1 said the weather was not very pleasant and kind of drizzly, so she thought the defendant purposely went back to the vehicles before that time and he asked her to sit in the back of his car. CHILD VICTIM 1 said she and the defendant were sitting next to each other in the backseat of his vehicle, where he kept asking to taste her "pink lips," which she understood to be the lips on her mouth. CHILD VICTIM 1 said she was wearing a tank top again and the defendant asked "Can I see?" while at the same time he lifted up her shirt, not over her head, exposing her breasts. CHILD VICTIM 1 said she was not expecting this to occur and knew he lifted up her shirt, but was unsure if he pulled her bra down to expose her breasts. CHILD VICTIM 1 said the defendant began licking her breasts with his tongue, clarifying he was "making circles on my breasts" with his "tongue." CHILD VICTIM 1 believed that lasted for about 10 seconds and he told her that was good. CHILD VICTIM 1 said the defendant had asked CHILD VICTIM 1 if she was shy and if he should make the first move and asked to kiss her. CHILD VICTIM 1 said the defendant kissed her for about 5 seconds, he told her that was good again and then they kissed for a longer period of time. The defendant asked her what color underwear she was wearing where she told him she commonly does not wear underwear, then he put his hand into her sweatpants and touched her bare hips and upper thigh area.

CHILD VICTIM 1 said this kissing at the Madison park had involved their tongue's kissing. CHILD VICTIM 1 said she believed that was all that she could remember happening for sure, saying she couldn't remember if the defendant put his hands down his pants and "got off" during that interaction at the park. CHILD VICTIM 1 said she knew the defendant "got off" during another incident though.

Detective Larson asked CHILD VICTIM 1 to clarify her comment about the defendant getting off, where she said the defendant is "very quick" describing under a minute. CHILD VICTIM 1 said she knew there were other times he got off, explaining about a time in the Milwaukee area.

CHILD VICTIM 1 said her sister attends a school in Milwaukee and the defendant was in a Seminary in Milwaukee during the week. CHILD VICTIM 1 originally was going to visit her sister and the defendant wanted to meet with CHILD VICTIM 1 and her sister while she was there. The defendant wanted to meet with CHILD VICTIM 1 at a location close to the Seminary. CHILD VICTIM 1 wasn't sure why she agreed to meet him there but she did. CHILD VICTIM 1 drove her vehicle and got into the front seat of the defendant's vehicle. While they were in the front seats, the defendant showed CHILD VICTIM 1 some pictures of his ex-girlfriend who was wearing only a bra and underwear.

The defendant asked her to get in the backseat, which she did. CHILD VICTIM 1 said they were then kissing each other and the defendant asked her to lie down on the backseat, where

he lifted her shirt up again and "ran his tongue on my breast." CHILD VICTIM 1 said her bra never fully came off, but he moved it to expose her breasts. CHILD VICTIM 1 was lying on her back as the defendant knelt on the floorboard in between the backseat and front seats when he was licking her breasts.

The defendant then told her to sit in the middle seat and he pushed both front seats forward and was going to "dry hump" her as they both had their clothes on. CHILD VICTIM 1 said it was uncomfortable for her so she asked him to sit and she straddle him, which she did. CHILD VICTIM 1 said it was only about 10 seconds and "he came so, in his pants" which she confirmed was him ejaculating.

The defendant then went back to the Seminary to change and met up with CHILD VICTIM 1 and her sister about an hour later. They all three then went to see the Basilica in Milwaukee. After they exited the Basilica, the defendant said he wanted a picture of him in his cassock (religious clothing) in the chapel area. CHILD VICTIM 1 said the defendant changed into his cassock and she accompanied him back into the Basilica to take his picture. CHILD VICTIM 1's sister remained in the vehicle. CHILD VICTIM 1 and the defendant took the elevator in the Basilica and when they were in the elevator, the defendant kissed her. CHILD VICTIM 1 remembered the defendant saying something similar to "Oh, I'm a naughty brother, I have my cassock on and am kissing a minor in an elevator."

CHILD VICTIM 1 said there was a later date where she met with the defendant outside the church in DeForest where her hand could feel his penis over his pants.

CHILD VICTIM 1 said the defendant knew she was 17 years old because she had her 17th birthday in July, after the defendant had come to the parish, and he had wished her a happy birthday. CHILD VICTIM 1 said during her months of contact with the defendant, he would talk to her about a countdown he had. CHILD VICTIM 1 said his countdown was until the time she was 18 years old because he knew it was illegal. CHILD VICTIM 1 said the defendant made mention of giving her a special present when she turned 18, which through his statements about the present she understood it as he was going to let her give him fellatio.

On Saturday October 1, 2022, CHILD VICTIM 1 was in DeForest with some friends. The defendant told her he really wanted to see her that day though so CHILD VICTIM 1 said they could hang out later. After she was done hanging out with her friends, she parked her car about a block away from the church (Village of DeForest, Dane County, Wisconsin) towards the west and he walked to meet her. CHILD VICTIM 1 said the defendant was wearing black sweatpants. The defendant told her they should drive somewhere else because he didn't want to get caught. CHILD VICTIM 1 said they did meet at one street but moved a short distance away. CHILD VICTIM 1 said she could tell he was paranoid about being caught, as he kept looking out the windows and knew some people on the block she was parked.

The defendant got in the front seat of her vehicle initially where they talked and eventually got in the backseat of her vehicle. CHILD VICTIM 1 said the same thing happened, them kissing and then she got on top of him in the same position and "he came again." Detective Larson asked CHILD VICTIM 1 if they kissed with tongue that time as well, she said yes and said he was a very "tonguey" person which was almost gross. CHILD VICTIM 1 said they kissed for about 5-10 minutes as they were seated next to each other in the backseat. CHILD VICTIM 1 said as they were kissing and she had to lean over towards him and propped herself with her

hand on his leg. CHILD VICTIM 1 said the defendant guided her hand onto his "dick," which she clarified as "penis." CHILD VICTIM 1 said she could tell the defendant was aroused because of his penis was erect, not soft and the way he was breathing.

CHILD VICTIM 1 said the defendant was grabbing her hips area under her clothes against her skin and he was guiding her movements as she straddled him. CHILD VICTIM 1 described her movements as "grinding" or "dry humping" and moving her hips forward and back with their groin areas touching. CHILD VICTIM 1 was asked how she knew the defendant ejaculated, which she described was from the noises he was making and him telling her he needed to go take a shower.

Detective Larson asked CHILD VICTIM 1 about any other incidents and she said those were all that she could remember of their in person contacts.

Detective Larson asked what that meant, she told Detective Larson there were a lot of video calls they had with each other through WhatsApp. CHILD VICTIM 1 said these video calls were almost always done when she was in her bedroom at her house and were completed at night after he got into his bed. CHILD VICTIM 1 said there may have been one or two times when he video called her during his day off and he would ask her to leave the video call on when she would have to get changed, but she did not change clothes in front of the camera. CHILD VICTIM 1 said not every call was specifically "bad," but most of them were. Detective Larson asked what she meant as "bad," she said some of the video calls were innocent and it was a slow progression, saying it started by him showing her his bedroom. CHILD VICTIM 1 said it then progressed to him asking to see her stomach, since she told him she didn't wear clothes to bed. CHILD VICTIM 1 said the defendant asked to see her stomach for 3 seconds, but she only allowed 1 second and he kept asking for more time to see her stomach over the video call. CHILD VICTIM 1 remembered their video chat would end after she showed him her stomach.

CHILD VICTIM 1 said one time she was covered by her bedsheet, but he could see her bra straps. The defendant asked to see her bra she was wearing and she did show him for a few seconds. CHILD VICTIM 1 said the defendant would ask for her to wear different colors of bras and underwear, or lingerie, and then he would ask her to get on her bed and "do stuff." CHILD VICTIM 1 said she could tell the defendant was masturbating from his facial expressions, him biting his lip or moving his jaw, as well as how his camera moved. CHILD VICTIM 1 said she would be wearing close to nothing and sitting on her bed or on her hands and knees.

The defendant asked for the cellphone camera to be closer and she didn't like the camera being close to herself, but she did as he asked. CHILD VICTIM 1 said she knew what the defendant wanted and would touch her vagina on top of her underwear and he wanted the camera very close to her vagina, asking her to put the camera only an inch away from her vagina.

The defendant would ask her to do different things in front of the cellphone camera such as different poses. CHILD VICTIM 1 said she did not remember the dates, but the defendant asked her to pull her bra down for a minute which she did, exposing her breasts to him through the video call. CHILD VICTIM 1 also said she had put her fingers under her underwear into her vagina. One-time the defendant asked her to turn around and move her underwear, for a "backshot" of her masturbating. CHILD VICTIM 1 reminded him she was a minor and he

laughed it off, but he asked her again and he didn't care that she was a minor, so she did. CHILD VICTIM 1 said that time she had her underwear on, but moved her underwear to the side exposing her vagina to the video call.

CHILD VICTIM 1 said she and the defendant did not have any specific sexual messages such as sexting, but they were suggestive like using devil emojis or telling her he had a devil thought about her. CHILD VICTIM 1 gave an example, saying she received the communion at church by kneeling and the defendant had sent her a message about him having a devilish thought when she was kneeling. CHILD VICTIM 1 did not think the defendant wrote anything specific so she could not screenshot anything, saying he wanted to keep it on video chat. CHILD VICTIM 1 said he only kept his camera on the video call showing just himself from his shoulders up but one time he did move the camera down towards his groin area and he was covered, but she could see sheet moving up and down, motioning her hand up and down.

CHILD VICTIM 1 said the defendant had two phones, which she understood one phone was his "dirty" phone he used for different countries and his "inappropriate" stuff and the other phone was his "clean," religious phone. Meaning if JJH asked for his phone, he would give him the clean phone.

CHILD VICTIM 1 also allowed Detective Larson to manipulate her cell phone and allowed him to export all of her WhatsApp messages with the defendant, which she had in the WhatsApp contact as Br. Reggie.

CHILD VICTIM 1 also provided Detective Larson with three images (screenshots) she had taken of her phone, which were screenshots she received from the defendant. CHILD VICTIM 1 said the defendant had been researching legal things about sexual or physical contact with minors. These images show Google or internet searches for things about having sexual contact with minors.

On December 1, 2022, Detective Larson and Officer Gilson went to the 600 block of Jefferson St. to meet with the defendant again. Detective Larson asked the defendant if he would come to the Police Department with him so he could ask him the questions there. The defendant agreed.

Detective Larson read the defendant his Constitutional Rights, pursuant to Miranda, word for word from his department issued Miranda card. Detective Larson then told the defendant he would like him to read those rights as Detective Larson knew he was from Pakistan, although he did acknowledge he could speak and read English. The defendant read the rights from the card. The defendant had a question, being new in the country and the first investigation in his life, asking about questions he may not feel like answering. Detective Larson told the defendant his right to remain silent could occur at any point, telling him Detective Larson did have some questions he wished to ask him. Detective Larson explained to him that even before he asked him questions, he could tell Detective Larson that he doesn't want to answer any questions, Detective Larson wouldn't ask him any questions and he could request a lawyer. The defendant clarified Detective Larson could ask him questions, but if Detective Larson asked him a question he didn't want to answer he could get a lawyer, which Detective Larson told him was accurate. The defendant said he was ready for questions and he would say that he would like a lawyer if a specific question was asked that he didn't want to answer without a lawyer. Detective Larson then read the last portion of the Miranda rights, specifically

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about his right to stop the questioning at any point if he decided to answer questions now. The defendant responded OK, apologized for asking questions where Detective Larson told him it was OK and he wanted to make sure he understood his rights.

The defendant confirmed again that people refer to him as Reggie, or Brother Reggie.

The defendant said he has been facilitating the Bible Studies at the identified parish for about 3 months, after he began attending the Seminary. The defendant said the Bible Study is attended by older adults but also a few juveniles on a common basis. The defendant said CHILD VICTIM 1 commonly attended the Bible Study and there were other 17 year old juveniles who would attend, including friends of CHILD VICTIM 1. The defendant also said he would participate in children's church activities which occurred for the parish. The defendant said he would not facilitate the children's activities, but he would attend and participate as a representative of the church.

Detective Larson asked the defendant about the time he met with CHILD VICTIM 1's grandfather in the hospital, with CHILD VICTIM 1 and her older sister. The defendant said during that time, he also went with CHILD VICTIM 1 and her sister to see Basilica of Saint Josaphat.

Detective Larson asked the defendant about the time he met with CHILD VICTIM 1 at a park in DeForest, which he said he remembered a part of the name was "green" and it was not far from here. Detective Larson asked the defendant if the park was Western Green Park but he could not remember the exact name.

Detective Larson asked the defendant if there were any other parks he went to with CHILD VICTIM 1. The defendant paused and said he did not think so, that was the only park. Detective Larson asked him to be honest and he paused again, saying yeah that was the one park, saying he had gone there maybe one or two times with her.

Detective Larson asked the defendant if he ever went to a park in Madison, by the water with a beach. The defendant replied yes and did not remember the name of it.

Detective Larson asked the defendant if he had any time alone with CHILD VICTIM 1 in the Milwaukee area the day he went with her to pray for her grandfather. The defendant said he met CHILD VICTIM 1 alone as she came early and they drove to a beach about 5 minutes away from the Seminary.

Detective Larson then began asking the defendant about where he and CHILD VICTIM 1 had been seated within the vehicles when they met each other.

When CHILD VICTIM 1 had parked on the street near the rectory in DeForest, the defendant got into her vehicle and sat in the front passenger seat as she sat in the driver's seat, with no one else in the vehicle.

The defendant said at the beach near the Seminary, CHILD VICTIM 1 had got into his vehicle and she sat in the front passenger seat as he sat in the driver's seat.

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The defendant said at the park in Madison after they went for a walk, CHILD VICTIM 1 got into his vehicle. Detective Larson asked the defendant if he was sitting in the driver's seat, he replied he thought so and when Detective Larson asked where CHILD VICTIM 1 was seated, he said they were maybe sitting in the backseat. He did not know if CHILD VICTIM 1 sat in the front seat or not, but said they were both in the backseat.

Detective Larson asked the defendant if he and CHILD VICTIM 1 were in the backseat of his vehicle while they were by the beach near the Seminary. The defendant paused for about 22 seconds then said he forgot and didn't know. Then he said he thought they were sitting in the front seats.

Detective Larson asked the defendant if he and CHILD VICTIM 1 sat in the backseat of her vehicle when she parked on the street near the rectory. The defendant paused again for about 10 seconds, then said "oh my goodness" and "I think I will remain silent here, is that ok?" Detective Larson then clarified with the defendant that he did not want to answer any more questions, which he confirmed.

****THIS COMPLAINT IS BASED ON** the information and belief of your complainant, who is a Court Officer for the Deforest Police Department, and who learned of the above offense from the reports of Deforest Police Detective Ben Larson, which report your complainant believes to be truthful and reliable inasmuch as they were prepared during the course of the officer(s) official duties.

Further, your complainant believes the information furnished by witness(es) to be truthful and reliable inasmuch as they are citizen informant(s) and witnessed the events described.

Your complainant believes the statements of the Defendant(s) to be truthful and reliable insofar as they are admissions against penal interest.

Subscribed and sworn to before me on 12/05/22 Electronically Signed By:

Electronically Signed By:

Benjamin Wagner

Assistant District Attorney

State Bar #: 1105056

Detective Benjamin Larson
Complainant