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IC IA 5/5/25 130 Assign to Branch

STATE OF WISCONSIN **CIRCUIT COURT**

STATE OF WISCONSIN

Plaintiff,

VS.

JEFFREY M ENDRES

1302 Landmark Dr Cottage Grove, WI 53527

DOB: 02/05/1976 Sex/Race: M/W Eve Color: Brown Hair Color: Brown Height: 5 ft 6 in Weight: 210 lbs

Alias:

Defendant,

DANE COUNTY

Ref. Agency: Cottage Grove Police

Department

DA Case No.: 2025DA004349

Assigned DA/ADA:

Agency Case No.: 2025-00178813

Court Case No.: 25CF ATN: 13196501016035

For Official Use

FILED 05-05-2025 **CIRCUIT COURT**

DANE COUNTY, WI

2025CF001064

CRIMINAL COMPLAINT

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

Count 1: FIRST DEGREE INTENTIONAL HOMICIDE

The above-named defendant on or about Monday, April 28, 2025, in the Village of Cottage Grove, Dane County, Wisconsin, did cause the death of KAH, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a) Wis. Stats., a Class A Felony, and upon conviction shall be sentenced to imprisonment for life.

Count 2: ATTEMPT FIRST DEGREE INTENTIONAL HOMICIDE

The above-named defendant on or about Monday, April 28, 2025, in the Village of Cottage Grove, Dane County, Wisconsin, attempted to cause the death of PPH, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.32 Wis. Stats., a Class B Felony, and upon conviction may be sentenced to a term of imprisonment not to exceed sixty (60) years.

Count 3: ATTEMPT FIRST DEGREE INTENTIONAL HOMICIDE

The above-named defendant on or about Monday, April 28, 2025, in the Village of Cottage Grove, Dane County, Wisconsin, attempted to cause the death of Juvenile Victim 1, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.32 Wis. Stats., a Class B Felony, and upon conviction may be sentenced to a term of imprisonment not to exceed sixty (60) years.

Count 4: MISTREATMENT OF ANIMALS

The above-named defendant on or about Monday, April 28, 2025, in the Village of Cottage Grove, Dane County, Wisconsin, did intentionally treat an animal, a black pit-bull, in a cruel manner, resulting in the animal's death, contrary to sec. 951.02, 939.50(3)(i) Wis. Stats., a

Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

FACTS:

INITIAL INCIDENT

On April 28, 2025, at approximately 6:36 PM, Cottage Grove Police Sergeant Jessica Frutiger responded to the report of a single vehicle vs. multiple pedestrians crash that occurred near the 1300 block of Landmark Drive in the Village of Cottage Grove, Dane County, Wisconsin.

Sergeant Jessica Frutiger reports that upon arrival at the location of the crash she observed three pedestrians, and a dog had been struck by a vehicle while walking near the Grand Appliance building on Landmark Drive.

VICTIMS IDENTIFIED

Sergeant Frutiger reports that one of the pedestrians, an adult female later identified as KAH, appeared to have been struck by the vehicle and was thrown approximately 25-30 feet. Sergeant Frutiger reports that it appeared that KAH's body had struck the side of the Grand Appliance building. KAH was transported by Deer Grove EMS to the University of Wisconsin Hospital.

Cottage Grove Police Officer Brandon Phillips reports that he was dispatched to the crash on Landmark Drive and arrived at the scene at approximately 6:40 PM. Upon arrival, Officer Phillips reports making contact with one of the pedestrians that was struck. This pedestrian, Juvenile Victim 1, was lying on his right side near the curb next to the street. Officer Phillips reports Juvenile Victim 1 had a large laceration on his arm and was conscious. Officer Phillips reports that he provided medical attention to Juvenile Victim 1 until he was transported by EMS to the hospital.

Sergeant Frutiger reports that the third pedestrian that was involved in the crash was identified at PPH. Sergeant Frutiger reports that PPH was struck by the vehicle, however, did not require immediate medical attention for his injuries.

Sergeant Frutiger ultimately learned that KAH and PPH were married, and Juvenile Victim 1 was their child.

Sergeant Frutiger reports that in addition to striking KAH, PPH, and Juvenile Victim 1, the suspect vehicle had also appeared to strike the family's dog. This dog was later identified as a black, pit-bull terrier. Sergeant Frutiger reports the dog was found dead upon her arrival at the scene.

SUSPECT IDENTIFIED

Cottage Grove Police Officer Evan Tapp reports that he was dispatched to the vehicle vs. pedestrian crash on Landmark Drive on April 28, 2025, and arrived at approximately 6:40 PM.

Officer Tapp reports that he approached the vehicle that appeared to be involved in the incident. Officer Tapp reports this vehicle was a gray Chevrolet Traverse with Wisconsin license plate 868SST. Officer Tapp reports the vehicle was overturned and located immediately next to the Grand Appliance building on Landmark Drive.

Upon approaching the vehicle, Officer Tapp observed that there were no occupants in the vehicle. Officer Tapp reports that there was a male with obvious injuries stranding near a nearby retaining wall observing the scene. Officer Tapp made contact with this male and verbally identified him as **JEFFREY M. ENDRES, THE DEFENDANT HEREIN**. Officer Tapp asked the defendant if he was the driver of the overturned vehicle, and the defendant indicated that he was. Officer Tapp reports that the defendant indicated he was "having a bad day" and responded that he had "no comment" when asked about the crash.

At approximately 7:00 PM, Officer Tapp reports that he assisted in the loading and transportation of the defendant to the hospital to be treated for his injuries. Officer Tapp reports that while being questioned by medical staff, the defendant reported he was driving 25 miles per hour and lost control of his vehicle while driving to the gas station. The defendant further reported to medical staff that he had had suicidal thoughts within the past month.

INJURIES TO VICTIMS

KAH

Cottage Grove Police Officer Lily Nordskog reports that she was dispatched to the University of Wisconsin Hospital at approximately 9:00 PM on April 28, 2025, to check on the medial status of victim KAH. Upon arrival to the hospital, Officer Nordskog reports that she was informed that KAH had died during surgery. Officer Nordskog reports the KAH's time of death was 8:24 PM.

On April 30, 2025, Detective Brian Carter of the Cottage Grove Police Department attended the autopsy of KAH. The autopsy was performed by Dane County Chief Medical Examiner Dr. Agnieszka Rogalska. Dr. Rogalska reported that preliminary findings showed KAH's cause of death was blunt force injuries.

PPH

PPH reported to Det. Carter that his injuries primarily consisted of abrasions and scratches to his leg.

Juvenile Victim 1

PPH reported to Det. Carter that his son, Juvenile Victim 1, suffered significant injuries in the crash. The injuries required hospitalization and surgery. PPH described Juvenile Victim 1's injuries as a concussion, right leg bruise, bruise to right knee requiring immobilization for 3 weeks, right forearms lacerations with lacerated tendons, extensive "road rash" in many locations, and stomach lacerations. PPH stated Juvenile Victim 1 has to wear an arm cast from shoulder to his fingers.

INVESTIGATION INTO THE CRASH

Cottage Grove Police Detective Brian Carter reports he responded to the above-stated scene of the crash shortly after the pedestrians had been transported to the hospital. Det. Carter reports observing the victims' shoes in two different locations near the east sidewalk of Landmark Drive. Det. Carter reports it appeared to him that the pedestrians were ejected from their shoes when they were struck by the vehicle. Det. Carter reports the roadway was dry and the weather was cloudy. Det. Carter reports that he observed tire track impressions leading through the grass to the sidewalk on Landmark Drive. Det. Carter reports seeing blood and black tire marks on the curb and sidewalk.

Officer Nordskog reports that she spoke to PPH at the UW Hospital the night of April 28, 2025. PPH stated that he was on an evening walk with his family that evening. PPH reported that as the family walked down Landmark Drive the family was on the east sidewalk near the Grand Appliance building. PPH stated he was on the left, KAH was in the middle, and Juvenile Victim 1 was on the right (closest to the road).

PPH stated that as they were walking, he heard a vehicle accelerating and he looked up to see the grey Chevrolet Traverse "flooring it" in their direction. PPH stated he watched the vehicle accelerate and drive over the curb directly at the family. PPH stated the vehicle drove "straight into us." PPH stated it appeared the vehicle was accelerating as it hit the curb, and it went flying over the curb "like he never hit the brakes." PPH stated that his leg was grazed by the vehicle, and he ended up on the ground. PPH stated that when he looked up, he observed his son, Juvenile Victim 1, lying near the road moaning in pain.

PPH stated that another one of his children, Juvenile Victim 2, observed the entire incident from the backyard of the family's home across the street. PPH stated that Juvenile Victim 2 ran over to PPH and said, "he tried to hit you." PPH estimated the speed of the vehicle to be at least 40 miles per hour.

PPH reports that he recognized the vehicle that had hit them and observed "Jeff" crawling out of the vehicle after the crash. PPH stated to Det. Carter on May 2, 2025 that "Jeff" was a neighbor that was a close friend of the family until recently. PPH stated "I'm confident he was intentionally trying to kill us or [Juvenile Victim 1] at least."

On May 2, 2025, PPH was interviewed by Det. Carter to obtain more information about the crash. Det. Carter asked PPH additional questions about seeing "Jeff" after the crash. PPH stated that he saw the driver sitting against the wall of Grand Appliance after the driver crawled out of the vehicle. PPH stated the driver looked like Jeffrey Endres sitting against the wall. PPH recognized the driver as Jeffrey Endres after seeing the vehicle and the driver's face. PPH recalled Jeffrey Endres having a "smug look on his face" while he was sitting against the wall. PPH stated he was a long way away from Jeffrey Endres when he saw his face, but did not feel that Jeffrey Endres was displaying a normal reaction to what had just occurred.

PPH felt the crash was intentional due to the engine revving. PPH stated that there was no reason a vehicle would jump the curb at that location. PPH did not recall hearing tires squealing or horn honking. PPH recalled hearing an engine revving, the sound of the vehicle

bouncing over the curb, and then an extremely loud bang as the vehicle hit the fence and building. PPH does not recall hearing any other vehicles around the time of the crash. PPH stated the revving sound of the vehicle that struck them sounded like someone punching the accelerator down to the floor, rapidly trying to increase speed, which is what caught his attention and caused him to look up.

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CONTACT WITH WITNESSES

Dane County Sheriff's Office Detective William Hendrickson reports that he was assigned to assist in the crash scene investigation on the evening of April 28, 2025. Det. Hendrickson reports that he responded to the Landmark Drive scene and began to speak with witnesses to the crash.

Det. Hendrickson reports he spoke with a witness identified as ALM. ALM stated that she was in her driveway at the time of the crash. ALM stated that she first noticed the grey SUV involved in this incident traveling north on Landmark Drive while "absolutely flying" and traveling "very fast." ALM stated that while it was quite common to see vehicles speeding on Landmark Drive, it was nothing like the speed she observed the SUV traveling. ALM estimated the speed of the SUV at 60 mile per hour at least. The speed limit on Landmark Drive was noted by Det. Hendrickson to be 25 miles per hour. ALM stated that the vehicle left the roadway, struck a curb, and entered the grass near the sidewalk. ALM stated she lost sight of the vehicle at that point. ALM stated that she did not see the SUV strike the pedestrians; however, she heard it and immediately rendered aid.

Det. Hendrickson spoke to another witness to the crash, identified as SEM. SEM reports that he was driving for Uber at the time of the crash and witnessed the incident on Landmark Drive. SEM spoke to Det. Hendrickson by phone on the evening of April 28, 2025. SEM advised that he was driving north on Landmark Drive and noticed the suspect vehicle accelerating at a high rate of speed behind him. SEM reports that he was concerned looking in his rearview mirror that the suspect vehicle was moving so fast it may hit his vehicle from behind. SEM reports that as the suspect vehicle was gaining on him from behind, he increased his vehicle's speed to approximately 40 miles per hour. SEM described the suspect vehicle as a dark colored SUV that was involved in the crash that evening.

SEM stated that he observed a family of three on the sidewalk near Landmark Drive walking a dog. SEM stated that he continued to observe the suspect vehicle approaching him from behind. SEM stated that he observed the suspect vehicle "jerk" and drive directly into the victims walking on the sidewalk. SEM stated that it seemed that the vehicle may have tried to hit the pedestrians. Det. Hendrickson asked SEM if what he was telling him was that he did not believe that the suspect vehicle had simply veered off the roadway, and SEM's response was, "If he's telling you he veered off the roadway, then he's lying to you. I saw that vehicle jerk." SEM went on to say that the suspect vehicle went "straight into them," referring to the pedestrians.

MOTIVE

In an interview with Det. Carter on May 2, 2025, PPH stated that his family and the Endres family had a positive relationship until recently. The two families were neighbors, and both resided in homes on Landmark Drive. PPH recalled that their children were on the same

gymnastics team. PPH's family and the Endres family would carpool to practices and meets. The children had been friends and played together regularly and were considered best friends. PPH reported the adults in the two families had also been friendly until recently.

PPH stated that the relationship between the two families changed drastically in late March of 2025. At that time, PPH stated that an allegation of a sensitive crime arose in which his son, Juvenile Victim 1, was accused of a sensitive crime involving the defendant's minor child. PPH stated that following these allegations, there was a "no contact" between the families.

In March of 2025, Cottage Grove Police Officer and School Resource Officer Zenas Lee was assigned to investigate the sensitive crime involving Juvenile Victim 1 and the defendant's minor child. Officer Lee reports that he and other investigators were in the process of examining numerous cell phones of students at a local middle school regarding an unrelated investigation. During the examination of those phones, Officer Lee reports several videos that were discovered on the phone belonging to Juvenile Victim 1 that appeared to be the victimization of the defendant's minor child. An investigation was conducted by the Cottage Grove Police Department and ultimately a juvenile court proceeding was commenced.

PPH stated he participated in a court hearing over Zoom on Friday, March 28, 2025 involving his son, Juvenile Victim 1. PPH recalled the defendant appearing and being distraught. PPH stated the defendant stated that he did not want Juvenile Victim 1 to be released anywhere near the residence or in the neighborhood. Your complainant is aware that Juvenile Victim 1 was ultimately released from custody and allowed to remain in the family home on Landmark Drive while court proceedings continued.

Cottage Grove Police Lieutenant Matthew Wagner reports that on April 23, 2025, the defendant contacted the Village of Cottage Grove Police by email and made an open records request for the police reports involving the incident with his minor child and Juvenile Victim 1. The email from the defendant stated "We would like a copy of the police report for case 2025JV... We are the victims parents." Your complainant is aware that the case number referenced in the defendant's email is the Dane County Juvenile case number involving the crime alleged against Juvenile Victim 1 in which the defendant's minor child is the alleged victim.

This request was made five days prior to the crash at issue in this complaint.

Lt. Wagner reports that on April 28, 2025, at 3:43 PM, a staff member of the Village of the Cottage Grove Police Department responded to the email sent by the defendant. In this email, the Village of Cottage Grove Police provided the defendant with a redacted set of police reports of the incident involving his minor child and Juvenile Victim 1.

Your complainant has reviewed the redacted set of reports provided to the defendant. The redactions eliminated the names of the various juveniles involved. In PPH's statement to Det. Carter, it was clear that the defendant was aware of the identity of Juvenile Victim 1 and knew him to be the suspect in the victimization of his minor child. The reports provided by the Village of Cottage Grove Police to the defendant contained detailed descriptions of videos purporting to show the victimization of the defendant's minor child by Juvenile Victim 1.

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Lt. Wagner reports that email records show these reports were provided to the defendant less than three hours before the crash at issue in this complaint.

PPH stated to Det. Carter that he believed the defendant intentionally hit his family with his vehicle in response to the allegations that his son, Juvenile Victim 1, had engaged in criminal activity with the defendant's minor child.

**THIS COMPLAINT IS BASED ON the information and belief of your complainant, who is a court officer for the Village of Cottage Grove Police Department, and who learned of the above offense from the reports of Village of Cottage Grove Police Lt. Matthew Wagner, Police Sgt. Jessica Frutiger, Police Officer Zenas Less, Police Officer Brandon Phillips, Police Officer Evan Tapp, Police Officer Lily Nordskog, and Police Detective Brian Carter, and Dane County Sherrif's Detective William Hendrickson, 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 provided by Dane County Chief Medical Examiner Dr. Agnieszka Rogalska to be truthful and reliable inasmuch as it was information provided during the normal course of Dr. Rogalska's official duties.

Further, your complainant believes the information furnished by witnesses 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 to be truthful and reliable insofar as they are admissions against penal interest.

Subscribed and sworn to before me on 05/05/25 Electronically Signed By:

Kasey M. Deiss

Assistant District Attorney

State Bar #: 1065778

Electronically Signed By: Wagner Complainant