

STATE OF WISCONSIN CIRCUIT COURT BARRON COUNTY

STATE OF WISCONSIN

-VS-

Kyle T Jaenke-Annis
1971 16 1/2 Ave #42
Cameron, WI 54822
DOB: 03/19/1986
Sex/Race: M/W
Eye Color: Brown
Hair Color: Brown
Height: 5 ft 10 in
Weight: 175 lbs
Alias:

Plaintiff,

DA Case No.: 2018BA001415
Assigned DA/ADA: Brian H Wright
Agency Case No.: 1832790
Court Case No.: 18 CF 401

ATN: 03002000158546

Criminal Complaint

Defendant,

The undersigned, on information and belief, being first duly sworn, states that:

Count 1: BURGLARY OF A BUILDING OR DWELLING

The above-named defendant on or about Saturday, October 27, 2018, Barron County, Wisconsin, did intentionally enter a dwelling , more particularly described as the Closs residence , without the consent of the person in lawful possession of the place, and with intent to steal ,, contrary to sec. 943.10(1m)(a), 939.50(3)(f) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

Count 2: FELONY BAIL JUMPING – for committing a new crime in violation of bond in Barron County case 18 CF 310

The above-named defendant on or about Saturday, October 27, 2018, Barron County, Wisconsin, having been charged with a felony and having been released from custody under Chapter 969 Wis. Stats., did intentionally fail to comply with the terms of his bond, contrary to sec. 946.49(1)(b), 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.

PROBABLE CAUSE:

Basis for this complaint is a statement by the undersigned that he/she is District Attorney/Assistant District Attorney with the Barron County District Attorney's Office and as such has access to all reports and complaints filed with his/her department. Complainant is informed by the report of Sgt. Ryan Hulback of the Barron County Sheriff's Department.

Sgt. Ryan Hulback, with the Barron County Sheriff's Department, reports on October 27, 2018, at approximately 2:22 AM, he was notified by Barron County Dispatch that Department of Criminal Investigation (DCI) Agents observed a male subject entering the east patio door of the Closs residence located at 1268 13 1/2 Avenue/U.S. Hwy 8, in Barron County, Wisconsin. Sgt. Hulback reports the male subject was seen on motion activated cameras that were set up outside on the property. Sgt. Hulback reports camera footage then showed the male subject, who was wearing a large puffy dark coat and a stocking hat, entering the east patio door of the residence.

Sgt. Hulback reports he immediately responded to the residence arriving at approximately 2:26 AM. Sgt. Hulback reports DCI Agents also immediately responded and arrived at the residence shortly after Sgt. Hulback arrived. Upon arrival, Sgt. Hulback reports he blacked out (no lights or siren) his squad, parked down the road on U.S. Highway 8, and approached the property on foot. While he was standing in the front yard, Sgt. Hulback reports he observed movement inside of the residence as there were several lights on, and the blinds/shades were open. After observing the initial movement, Sgt. Hulback reports he did not see any more movement after that.

Upon the arrival of DCI Agents, Sgt. Hulback reports law enforcement officers established a perimeter surrounding the outside of the residence. Sgt. Hulback reports he returned to his squad and retrieved his K9 partner. When he returned to the property with his K9, Sgt. Hulback reports he heard DCI Agents order the male subject to put his hands up and to walk out of the house. Sgt. Hulback reports he observed the male subject exiting the patio door. Sgt. Hulback observed the male subject was a Caucasian male wearing a puffy coat, glasses, and was holding onto a flashlight. DCI Agents detained the male subject, who was identified as the defendant Kyle T. Jaenke-Annis, whose date of birth is March 19, 1986.

Sgt. Hulback reports, he along with his K9, conducted a search and clearing of the residence with the assistance of DCI Agents and determined that there was no one else inside of the residence. Sgt. Hulback reports DCI Agents questioned the defendant, who admitted to entering the property without permission and stealing multiple items that did not belong to him from inside of the residence. Sgt. Hulback reports the following items were located in the defendant's coat pocket: a pink tank top size XS 4; orange and green girl's size 12 underwear; red and white girl's tank top (Under Armour brand); and orange and white girl's dress. Additionally, Sgt. Hulback reports the following items were located on the defendant's person: a black and green flashlight; a set of black gloves (CLC Worklight brand); and a black face mask with a skull on the front (Swiss Tech brand). Sgt. Hulback reports he photographed all of the items of evidence recovered from the defendant and placed them in a secure evidence locker.

Sgt. Hulback reports he observed from another room when the defendant was interviewed by FBI Agent Jennifer Walkowski and DCI Agent Chad Racine. The defendant stated he left work at the Jennie-O Turkey Store that evening and rode his bicycle to a laundromat in Barron. The defendant stated he then walked from the laundromat to the Closs residence. The defendant stated he was at the residence for about ten minutes when he heard what he believed were law enforcement officers outside.

The defendant stated that, when he arrived at the residence, he walked around the outside of the property, checked the door, and noticed that the patio door on the east side of the

residence was unlocked. The defendant stated he walked in and immediately located a room off to the right that he believed belonged to Jayme Closs. The defendant stated that, while he was in Jayme's room, he located a closet that was full of clothes. When asked if he had any clothing items on him that did not belong to him that came from the residence, the defendant stated, "Yes, from a room inside of the residence." The defendant stated he took a pink shirt from the room and other odds and ends from the house. The defendant was asked how many items he took and he stated three or four items, including some underwear that he believed belonged to Jayme.

Agents asked the defendant if he knew the Closs family and he stated "no." Agents asked the defendant if anyone had given him permission to enter the house and he stated, "no." Agents questioned the defendant about the flashlight he brought with him to the residence. The defendant stated he brought the flashlight just in case he wouldn't be able to see without artificial lighting. Agents asked the defendant if there was a reason why he took the specific items that he did, meaning the female clothing, and the defendant stated these were items that people wouldn't miss. Additionally, the defendant stated he was curious about what size Jayme was.

A check of the records on file at the Barron County Clerk of Court's Office, reveal that the defendant was released from custody after signing a bond on August 11, 2018, in Barron County Case No. 18 CF 310. Conditions of said bond included the condition that the defendant not commit any crimes. In 18 CF 310, which remains an open case, the defendant is charged with Burglary with an arraignment scheduled on December 19, 2018. Accordingly, said bond condition remains in full force and effect.

The statements made by the law enforcement officers can be considered truthful, credible, and reliable because of the positions of trust they hold. The statements of the citizen witnesses can be considered truthful, credible, and reliable because they are made by citizen witnesses. The statements of the defendant(s) can be considered truthful, credible, and reliable to the extent to which they are admissions against interests.

Subscribed and sworn to before me on 10/29/18
Electronically Signed By:
John Rafa Todd
Assistant District Attorney
State Bar #: 1107234

Electronically Signed By:
Brian H. Wright
Complainant