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STATE OF WISCONSIN

Plaintiff,

-vs-

JEREMY J RYAN  
8 Westover Ct  
Madison, WI 53719  
DOB: 08/29/1988  
Sex/Race: M/W  
Eye Color: Brown  
Hair Color: Brown  
Height: 6 ft 3 in  
Weight: 150 lbs  
Alias: Also Known As Segway Jeremy  
Also Known As Jeremy J Ryan  
Also Known As Segway

Ref. Agency: Madison (City) Police  
Department  
DA Case No.: 2014DA008961  
Assigned DA/ADA: Robert J. Kaiser, JR.  
Agency Case No.: 2014-00316730  
Court Case No.: 2014CF  
ATN: 13011409260025

Defendant,

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**COMPLAINING WITNESS**

Mark Zwart/Linda Trevarthen/Kris Acker/John Amos

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

**Count 1: STALKING, DOMESTIC ABUSE**

The above-named defendant from on or about September 1, 2014 through September 26, 2014, in the City of Madison, Dane County, Wisconsin, did intentionally engage in a course of conduct directed at a specific person, to wit, Loni M Warrner, that caused that person and that would cause a reasonable person under the same circumstances to suffer serious emotional distress or to fear bodily injury to themselves; and where the defendant knew or should have known that at least one of the acts that constituted the course of conduct would cause Loni M Warrner to suffer serious emotional distress or place Loni M Warrner in reasonable fear of bodily injury to herself; and where the defendant's acts caused Loni M Warrner to suffer serious emotional distress or induced fear in Loni M Warrner of bodily injury to herself, contrary to sec. 940.32(2), 939.50(3)(i), 968.075(1)(a) 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.

And further, invoking the provisions of sec. 968.075(1)(a) Wis. Stats., because this charge is an act of domestic abuse, costs upon conviction would include the domestic abuse assessment imposed under sec. 973.055(1) Wis. Stats.

**Count 2: DISORDERLY CONDUCT, DOMESTIC ABUSE**

The above-named defendant on or about Friday, September 26, 2014, in the City of Madison, Dane County, Wisconsin, while in a private place, did engage in abusive conduct, under circumstances in which such conduct tended to cause a disturbance, contrary to sec. 947.01(1), 939.51(3)(b), 968.075(1)(a) Wis. Stats., a Class B Misdemeanor, and upon conviction may be fined not more than One Thousand Dollars (\$1,000), or imprisoned not more than ninety (90) days, or both.

And further, invoking the provisions of sec. 968.075(1)(a) Wis. Stats., because this charge is an act of domestic abuse, costs upon conviction would include the domestic abuse assessment imposed under sec. 973.055(1) Wis. Stats.

**FACTS:**

Your complainant is a court officer with the City of Madison Police Department and for this complaint is relying upon the official police report of City of Madison Police Officer Jason Baumgart.

Officer Baumgart reports on September 26, 2014, at approximately 1:10am, he and Officer Palmer were dispatched to the address of 8 Westover Ct, in Madison, Dane County, Wisconsin, in reference to a disturbance. The female caller provided the address and informed Dispatch that she needed the police there immediately. The subject then disconnected with the 911 center. The call back indicated that the call went to voicemail. Dispatch received a second phone call from the same female. Dispatch indicated that they could hear a disturbance in the background.

Officer Baumgart reports upon arrival, he made initial contact with the female caller who identified herself verbally as Loni W Warrner. Warrner stated that she and Jeremy Ryan, the defendant herein, are boyfriend and girlfriend. Warrner stated the couple signed a lease together at 8 Westover Ct approximately two to three weeks ago.

Warrner stated that the defendant is extremely protective of her. Warrner stated the defendant calls her and texts her repeatedly during the day while she is at work. Warrner stated that she is a roofer and typically works between eight to twelve hours a day. Warrner stated that the defendant has recently been texting Warrner's boss. Warrner's boss informed Warrner earlier in the day that the defendant had sent him approximately 25 text messages. Warrner stated the defendant was under the assumption that Warrner was cheating on him and was checking up to see if she was at work. This included contacting her supervisor to verify she was at work. Warrner stated the defendant also inquired as to when her shift would be done for the day. Warrner stated that the defendant was only trying to gain further information as to whether she was cheating on him. Warrner described this behavior as "concerning." Warrner also stated that her boss pleaded with her to not go back to the residence on the night of September 26, 2014. Warrner stated that her boss also felt that there would be problems if she returned home.

Warrner stated that she finished her shift roofing and drove approximately two to two and a half hours back to Madison. Warrner stated that when she arrived home, she found the

house to be locked. Warrner stated she did not have her house keys on her and began to knock and ring the doorbell. No one came to the door. Warrner was able to peer into the living room and stated that she did see someone's legs through the blinds. Warrner stated she believed that someone was standing in the living room and was purposefully not allowing her to enter her own home. Warrner also made several phone calls to the defendant and the other roommates to allow her in. Warrner stated when she did not receive any response, she then went to the rear kitchen window which is typically left unlocked. Warrner stated she first called Dispatch about the legalities of climbing in through the window of her own home. Dispatch advised her not to do this and to wait for police.

Warrner disregarded this advice and did climb in through the kitchen window. Shortly after getting inside the home, she stated that the defendant arrived. Warrner stated she believed that Ryan was at 18 Westover Ct visiting some friends. Warrner stated when the defendant got home, she stated that he was extremely agitated already. The defendant was demanding that Warrner return his car keys. Warrner stated the defendant had given Warrner permission to drive his car to the jobsite in Wisconsin Rapids. Warrner stated that she told the defendant that while attempting to climb in the window, she must have lost his single black car key. The defendant became very upset with this.

Warrner stated to Officer Baumgart, "I know Ryan." Warrner continued by stating, "He was mad, and he was gonna take it out on me." Warrner stated that the defendant was extremely agitated. Warrner stated she could tell by his body language and the tone in his voice that he was upset. It was at this point that she then called 911 to ask the police to arrive on scene.

Warrner stated that the defendant now disclosed to Warrner that he was in possession of her keys. Warrner began to demand her keys back from him. Warrner stated as the defendant became more and more agitated, Warrner placed a second phone call to 911. Warrner stated that the defendant was agitated and upset and she was requesting the police respond. She also told the defendant that she had called 911.

Warrner described it as though the two were standing on the stairs leading from the main level to the upstairs area when the argument ensued. Warrner stated she told the defendant specifically that she had called 911 and was currently speaking to the dispatcher. Warrner stated that she was attempting to separate herself from the defendant due to his aggressive and loud behavior. Warrner stated that as she turned and walked up the stairs, the defendant was following her, attempting to grab the phone out of her hand. Warrner stated that the defendant was unable to grab the phone at any point. Warrner stated she was able to keep it in her hands, secured near her body to continue the conversation and to prevent him from taking the phone.

Warrner stated she then made her way to the bedroom that she and the defendant share. When she got to the doorway, she observed the door to be open two to three inches. She quickly entered the bedroom and closed the door behind her. She described it as though she was putting all of her bodyweight leaning against the door to prevent the defendant from entering. Warrner stated that she now felt the defendant pushing from the outside in to the bedroom. The defendant was able to force his way into the bedroom where the argument continued. Warrner stated that at one point, the defendant removed himself

from the bedroom. She felt that this was due to the fact that she was on the phone with the 911 center. Shortly after this, Warrner stated that the police arrived on scene.

Warrner stated that during the incident, she was extremely fearful for her safety. She was disturbed by the defendant's behavior and did not consent to it. She stated that she was "scared and fearful" that the defendant would physically harm her. Warrner stated, "I've never seen him that angry before." When Warrner was describing this scene to Officer Baumgart, she broke down crying several times.

Officer Baumgart reports that Warrner stated the defendant is a daily user of marijuana and most likely sold marijuana too. Warrner stated, "why else would he have all that cash?" Warrner stated that the defendant does not work and collects social security. Warrner stated that the defendant is a "pothead who sits and smokes weed and plays video games all day." Warrner stated she had not witnessed any drug transactions but said the defendant is always in possession of large amounts of US Currency, has several cell phones and several BB guns.

Officer Baumgart reports he explained to the defendant he was going to be placed under arrest, and the defendant pleaded with Officer Baumgart to be allowed to retrieve some cash from his bedroom so he could post bail. Officer Baumgart reports that Officer Palmer took the defendant to his bedroom to retrieve the cash. Officer Baumgart reports the defendant walked down the stairs carrying a safe. Warrner stated, "that's where he keeps his weed." Officer Baumgart reports he asked the defendant to open the safe so he could see what was inside. Officer Baumgart reports he observed a large amount of US currency inside. The defendant estimated that there was \$1,000 inside this safe. Officer Baumgart reports he estimated that there was most likely between \$2,000 and \$3,000 in US currency inside the safe. Officer Baumgart reports he could also smell the distinct odor of unburnt marijuana coming from the safe itself.

Officer Baumgart reports he again re-contacted Warrner and completed the Victim Notification of No Contact Provision. Warrner stated that she wished to enforce this 72 Hour order. Officer Baumgart reports he observed Warrner circle and sign the form. Officer Baumgart reports he provided Warrner with her copy of the form.

Officer Baumgart reports the defendant was transported to the Dane County Jail, and the defendant only wanted to keep his two cell phones and \$150 he retrieved from his safe for bail.

Officer Baumgart reports the defendant was given his copy of the 72 Hour No Contact Provision, it was explained to him that he should not have any contact with Warrner and should not return to the residence.

**\*\*THIS COMPLAINT IS BASED ON the information and belief of your complainant, who is a COURT OFFICER for the City of Madison Police Department, and who learned of the above offense from the reports of City of Madison Police Officer(s) Jason Baumgart, 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.**

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Further, your complainant believes the information furnished by Loni Warrner to be truthful and reliable inasmuch as she is a citizen informant(s) and witnessed the events described.

Subscribed and sworn to before me,  
and approved for filing on:

This \_\_\_\_\_ day of \_\_\_\_\_, 2014

\_\_\_\_\_  
ASSISTANT/DEP DISTRICT ATTORNEY  
DANE COUNTY, WISCONSIN

\_\_\_\_\_  
COMPLAINANT