

CRIMINAL COMPLAINT



STATE OF WISCONSIN

Plaintiff,

DA Case No.: 2008DA000894

Agency Case No.: TWMP 08-7408

-vs-

Court Case No. 2008 CF

ROBERT L ROBINSON

NPA

NONE, WI

DOB: 10/09/1988

Sex/Race: M/B

Eye Color: Brown

Hair Color: Black

Height: 5 ft 8 in

Weight: 200 lbs

Alias:

ATN:

Defendant,

COMPLAINING WITNESS

Garton, Retlick, Parks, Boldebuck, Gehn

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

Count 1: ATTEMPT FIRST DEGREE INTENTIONAL HOMICIDE

The above-named defendant on or about Wednesday, January 09, 2008, in the Town of Madison, Dane County, Wisconsin, attempted to cause the death of Terry J Pollard, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.32 Wis. Stats., an attempt to commit a Class B Felony, and upon conviction may be sentenced to a term of imprisonment not to exceed sixty (60) years.

Count 2: FIRST DEGREE RECKLESS INJURY

The above-named defendant on or about Wednesday, January 09, 2008, in the Town of Madison, Dane County, Wisconsin, did recklessly cause great bodily harm to Terry J Pollard, under circumstances which show utter disregard for human life, contrary to sec. 940.23(1)(a), 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.

FACTS: Town of Madison Police Department Detective Rob Hale reports the following: On 01/09/08, he spoke with Terry Pollard, who had been shot in the upper chest earlier that day in the 200 block of Deer Valley Road in the Town of Madison, Dane County, Wisconsin. Detective Hale showed Pollard a series of photographs taken from Dane County Sheriff's records and Pollard identified one of the photographs identified by DCSO records as the defendant herein as the person who shot him. Pollard was being treated at the hospital and provided the following account:

His 15 year old nephew DJ came to Pollard's house and told him that he'd been in an argument with someone, and that "some boys were messing" with him. Pollard went outside and saw a group of teenage boys in the parking lot. When he arrived, the defendant and another black male, neither of whom he'd ever seen before, exited a newer blue or black Cadillac. Pollard and the defendant spoke with one another, trying to figure out what was going on. The defendant became hostile and began calling him and everyone else "bitches". There was a lot of name calling.

Pollard stated that he and the defendant were facing one another and were very close when the defendant shot him in the upper chest. Pollard turned and ran, holding his arm, which had suddenly become immobile, and heard a second shot. The defendant ran back to the Cadillac, got in and the car left.

Detective Hale reports that he spoke with Dr. Sauerhammer, who treated Pollard. She stated that the bullet had fractured the clavicle on the right side, and caused a contusion to his upper right lung. The bullet traveled from left to right inside the body and lodged in the shoulder. Dr. Sauerhammer stated that the injury was life threatening, given its proximity to the heart, major blood vessels and lungs.

Your complainant is an officer for the Town of Madison Police Department who believes Detective Hale's reports reliable because written in the course of official duties; the statements of Mr. Pollard and Dr. Sauerhammer are reliable because they are based on personal knowledge.

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

This _____ day of January, 2008

ASSISTANT/DEP DISTRICT ATTORNEY
DANE COUNTY, WISCONSIN

COMPLAINANT