FILED
07-19-2023
Anna Maria Hodges
Clerk of Circuit Court
2023CF003174
Honorable Michelle A. Havas-10
Branch 10

STATE OF WISCONSIN **CIRCUIT COURT** **MILWAUKEE COUNTY**

STATE OF WISCONSIN
Plaintiff,

vs.

MAYER, LONNY ALLEN
2833 RIVERSIDE DRIVE
GREEN BAY, WI 54307
DOB: 09/28/1969

Defendant(s).

DA Case No.: 2022ML021513
Court Case No.:

CRIMINAL COMPLAINT

For Official Use

THE BELOW NAMED COMPLAINANT BEING DULY SWORN, ON INFORMATION AND BELIEF STATES THAT:

Count 1: STALKING, HABITUAL CRIMINALITY REPEATER

The above-named defendant January 24, 2022 to July 6 2023, at 3367 South 76th Street #2, in the City of Milwaukee, Milwaukee County, Wisconsin and other places in Milwaukee County Wisconsin, did intentionally engage in a course of conduct directed at MKL that would cause a reasonable person under the same circumstances to fear bodily injury to a member of her family, where the defendant should have known that at least one of the acts that constitute the course of conduct would have that effect, and where the defendant's act in fact caused the victim to fear bodily injury to a member of her family, contrary to sec. 940.32(2), 939.50(3)(i), 939.62(1)(b) Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendant 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. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than 4 years, if the prior conviction was a felony.

Count 2: FELONY INTIMIDATION OF A WITNESS (BY PERSON CHARGED WITH A FELONY), HABITUAL CRIMINALITY REPEATER

The above-named defendant on or about Monday, January 24, 2022, at 901 North 9th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, being a person charged with a felony, did knowingly and maliciously attempt to dissuade MKL, a witness, from giving testimony at a proceeding authorized by law, in connection with that felony, contrary to sec. 940.43(7), 939.50(3)(g), 939.62(1)(b) Wis. Stats.

Upon conviction for this offense, a Class G Felony, the defendant may be fined not more than Twenty Five Thousand Dollars ($25,000), or imprisoned not more than ten (10) years, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than 4 years, if the prior conviction was a felony.

Count 3: BATTERY/THREAT TO A WITNESS, HABITUAL CRIMINALITY REPEATER

The above-named defendant on or about Monday, January 24, 2022, at 949 North 9th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did intentionally threaten to cause bodily harm to MKL, a person he had reason to know was a witness by reason of the person having attended as a witness, without the consent of the person threatened, contrary to sec. 940.201(2), 939.50(3)(h), 939.62(1)(b) Wis. Stats.

Upon conviction for this offense, a Class H Felony, the defendant may be fined not more than Ten Thousand Dollars ($10,000), or imprisoned not more than six (6) years, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than 4 years, if the prior conviction was a felony.

Count 4: CONTEMPT OF COURT - DISOBEY ORDER

The above-named defendant on or about Monday, January 24, 2022, at 901 North 9th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did intentionally disobey, resist, or obstruct the authority, process, or order of the court, contrary to sec. 785.01(1)(b), 785.04(2)(a) Wis. Stats.

Upon conviction for this offense, a Misdemeanor, the defendant may be fined not more than Five Thousand Dollars ($5,000), or imprisonment in the county jail for not more than one (1) year, or both.

Count 5: FELONY INTIMIDATION OF A WITNESS (BY PERSON CHARGED WITH A FELONY), HABITUAL CRIMINALITY REPEATER

The above-named defendant on or about Monday, March 7, 2022, at 3367 South 76th Street #2, Milwaukee WI, Milwaukee County, Wisconsin, being a person charged with a felony, did knowingly and maliciously attempt to dissuade MKL, a witness, from giving testimony at a proceeding authorized by law, in connection with that felony, contrary to sec. 940.43(7), 939.50(3)(g), 939.62(1)(b) Wis. Stats.

Upon conviction for this offense, a Class G Felony, the defendant may be fined not more than Twenty Five Thousand Dollars ($25,000), or imprisoned not more than ten (10) years, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than 4 years, if the prior conviction was a felony.

Count 6: CONTEMPT OF COURT - DISOBEY ORDER

The above-named defendant on or about Monday, March 7, 2022, at 3367 South 76th Street #2, Milwaukee WI, Milwaukee County, Wisconsin, did intentionally disobey, resist, or obstruct the authority, process, or order of the court, contrary to sec. 785.01(1)(b), 785.04(2)(a) Wis. Stats.

Upon conviction for this offense, a Misdemeanor, the defendant may be fined not more than Five Thousand Dollars ($5,000), or imprisonment in the county jail for not more than one (1) year, or both.

Count 7: FELONY INTIMIDATION OF A WITNESS (BY PERSON CHARGED WITH A FELONY), HABITUAL CRIMINALITY REPEATER

The above-named defendant on or about Thursday, March 24, 2022, at 3367 South 76th Street #2, in the City of Milwaukee, Milwaukee County, Wisconsin, being a person charged with a felony, did knowingly and maliciously attempt to dissuade MKL, a witness, from giving testimony at a proceeding authorized by law, in connection with that felony, contrary to sec. 940.43(7), 939.50(3)(g), 939.62(1)(b) Wis. Stats.

Upon conviction for this offense, a Class G Felony, the defendant may be fined not more than Twenty Five Thousand Dollars ($25,000), or imprisoned not more than ten (10) years, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than 4 years, if the prior conviction was a felony.

Count 8: CONTEMPT OF COURT - DISOBEY ORDER

The above-named defendant on or about Thursday, March 24, 2022, at 3367 South 76th Street #2, in the City of Milwaukee, Milwaukee County, Wisconsin, did intentionally disobey, resist, or obstruct the authority, process, or order of the court, contrary to sec. 785.01(1)(b), 785.04(2)(a) Wis. Stats.

Upon conviction for this offense, a Misdemeanor, the defendant may be fined not more than Five Thousand Dollars ($5,000), or imprisonment in the county jail for not more than one (1) year, or both.

Count 9: TERRORIST THREATS, HABITUAL CRIMINALITY REPEATER

The above-named defendant on or about Thursday, April 14, 2022, at 2323 South 102nd Street, in the City of West Allis, Milwaukee County, Wisconsin, as an actor who was aware of and created an unreasonable and substantial risk of cause public panic or fear, did threaten to cause the death of or bodily harm to any person or to damage any person's property, contrary to sec. 947.019(1), 939.50(3)(i), 939.62(1)(b) Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendant 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. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than 4 years, if the prior conviction was a felony.

Count 10: BATTERY/THREAT TO A WITNESS, HABITUAL CRIMINALITY REPEATER

The above-named defendant on or about Thursday, June 16, 2022, at 2323 South 102nd Street, in the City of West Allis, Milwaukee County, Wisconsin, did intentionally threaten to cause bodily harm to

MKL, a person he had reason to know was a witness by reason of the person having attended as a witness, without the consent of the person threatened, contrary to sec. 940.201(2), 939.50(3)(h), 939.62(1)(b) Wis. Stats.

Upon conviction for this offense, a Class H Felony, the defendant may be fined not more than Ten Thousand Dollars ($10,000), or imprisoned not more than six (6) years, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than 4 years, if the prior conviction was a felony.

Count 11: THREATS TO INJURE OR ACCUSE OF A CRIME, HABITUAL CRIMINALITY REPEATER

The above-named defendant on or about Thursday, June 16, 2022, at 2323 South 102nd Street, in the City of West Allis, Milwaukee County, Wisconsin, did verbally threatens to injure MKL with intent thereby to compel the MKL to do any act against the person's will., contrary to sec. 943.30(1), 939.50(3)(h), 939.62(1)(b) Wis. Stats.

Upon conviction for this offense, a Class H Felony, the defendant may be fined not more than Ten Thousand Dollars ($10,000), or imprisoned not more than six (6) years, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than 4 years, if the prior conviction was a felony.

Count 12: FELONY INTIMIDATION OF A WITNESS (BY PERSON CHARGED WITH A FELONY), HABITUAL CRIMINALITY REPEATER

The above-named defendant on or about Saturday, July 2, 2022, at 901 North 9th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, being a person charged with a felony, did knowingly and maliciously attempt to dissuade MKL, a witness, from giving testimony at a proceeding authorized by law, in connection with that felony, contrary to sec. 940.43(7), 939.50(3)(g), 939.62(1)(b) Wis. Stats.

Upon conviction for this offense, a Class G Felony, the defendant may be fined not more than Twenty Five Thousand Dollars ($25,000), or imprisoned not more than ten (10) years, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than 4 years, if the prior conviction was a felony.

Count 13: FELONY INTIMIDATION OF A WITNESS (BY PERSON CHARGED WITH A FELONY), HABITUAL CRIMINALITY REPEATER

The above-named defendant on or about Thursday, November 3, 2022, at 3367 South 76th Street #2, in the City of Milwaukee, Milwaukee County, Wisconsin, being a person charged with a felony, did

knowingly and maliciously attempt to dissuade MKL, a witness, from giving testimony at a proceeding authorized by law, in connection with that felony, contrary to sec. 940.43(7), 939.50(3)(g), 939.62(1)(b) Wis. Stats.

Upon conviction for this offense, a Class G Felony, the defendant may be fined not more than Twenty Five Thousand Dollars ($25,000), or imprisoned not more than ten (10) years, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than 4 years, if the prior conviction was a felony.

Count 14: ATTEMPT BATTERY/THREAT TO A WITNESS, HABITUAL CRIMINALITY REPEATER

The above-named defendant on or about Thursday, November 3, 2022, at 3367 South 76th Street #2, in the City of Milwaukee, Milwaukee County, Wisconsin, attempted to intentionally threaten to cause bodily harm to MKL, a person he had reason to know was a witness by reason of the person having attended as a witness, without the consent of the person threatened, contrary to sec. 940.201(2), 939.50(3)(h), 939.32, 939.62(1)(b) Wis. Stats.

Upon conviction for this offense, an attempt to commit a Class H Felony, the defendant may be fined not more than Five Thousand Dollars ($5,000), or imprisoned not more than three (3) years, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than 4 years, if the prior conviction was a felony.

Count 15: BATTERY/THREAT TO A WITNESS, HABITUAL CRIMINALITY REPEATER

The above-named defendant on or about Thursday, June 1, 2023, at 901 North 9th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did intentionally threaten to cause bodily harm to MKL, a person he had reason to know was a witness by reason of the person having attended as a witness, without the consent of the person threatened, contrary to sec. 940.201(2), 939.50(3)(h), 939.62(1)(b) Wis. Stats.

Upon conviction for this offense, a Class H Felony, the defendant may be fined not more than Ten Thousand Dollars ($10,000), or imprisoned not more than six (6) years, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than 4 years, if the prior conviction was a felony.

Count 16: CONTEMPT OF COURT - DISOBEY ORDER

The above-named defendant on or about Thursday, June 1, 2023, at 901 North 9th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did intentionally disobey, resist, or obstruct the authority, process, or order of the court, contrary to sec. 785.01(1)(b), 785.04(2)(a) Wis. Stats.

Upon conviction for this offense, a Misdemeanor, the defendant may be fined not more than Five Thousand Dollars ($5,000), or imprisonment in the county jail for not more than one (1) year, or both.

Count 17: FELONY INTIMIDATION OF A WITNESS (BY PERSON CHARGED WITH A FELONY), HABITUAL CRIMINALITY REPEATER

The above-named defendant on or about Thursday, July 6, 2022, at 2323 South 102nd Street, in the City of West Allis, Milwaukee County, Wisconsin, being a person charged with a felony, did knowingly and maliciously attempt to dissuade MKL, a witness, from giving testimony at a proceeding authorized by law, in connection with that felony, contrary to sec. 940.43(7), 939.50(3)(g), 939.62(1)(b) Wis. Stats.

Upon conviction for this offense, a Class G Felony, the defendant may be fined not more than Twenty Five Thousand Dollars ($25,000), or imprisoned not more than ten (10) years, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than 4 years, if the prior conviction was a felony.

Probable Cause:

Complainant is a City of Milwaukee Law Enforcement Officer and bases this complaint upon her own investigation which revealed the following:

Complainant is aware that when case 20CF617 was charged and the defendant made his initial appearance back in February of 2020 the defendant was ordered to have no contact with MKL. In fact On February 12, 2020 the above named defendant made in an initial appearance in intake court before Hon. Rosa Barillas in case 20CF617. During the initial appearance for that case the defendant was before the court, and the state moved to have the defendant's communication privileges rescinded pursuant to Wis. Stat §§ 940.47 and 940.48, not as a condition of bail but immediately to prevent any contact with MKL the alleged victim of 20CF617. The motion stated the following:

> 1. As the State will recite on the record, Defendant Lonnie Mayer has an extensive history of disobeying orders, intimidating witnesses, and domestic abuse involving multiple women.[1]
>
> 2. In State v. Mayer, "[a] jury convicted Mayer of solicitation to commit battery to a witness and conspiracy to commit battery to a witness, contrary to WIS. STAT. §§ 939.30(1), 939.31 and 940.201(2) (2001-02). Mayer was sentenced to six years' initial confinement and five years' extended supervision on each count, to be served consecutively." No. 2004AP2673 (Attached); No. 2002CF3776 (Milwaukee Co. Cir. Ct.) According to the criminal complaint in these cases, the defendant offered to pay an inmate and undercover officer to hurt a witness against him. "Just fuck her up, man" the defendant asked. The defendant indicated he wanted her teeth knocked out.
>
> 3. Court and Department of Corrections show the defendant has been revoked from extended supervision on this case and is presently in custody with a mandatory release date of 2/13/2020.
>
> 4. In the most recent case, No. 2020CF0617, the defendant is chargedwith stalking, victim intimidation, and threats to injure or accuse of a crime. The complaint details strangulation, violence, and the defendant's attempts to intimidate MKL as documented in phone calls.

5. District Attorney Investigator Michael Wilkerson reports that he has access to Milwaukee County Sheriff's Office records, including jail calls and jail records. Since this case has been charged and since the defendant recently arrived at the Milwaukee Criminal Justice Facility, he has made more than 100 calls to MKL. Inv. Wilkerson reports that he has listend to these calls and the defendant has reached MKL in some of them. IN these calls, the defendant tells MKL to come to court and say her peace and "fight for us." He also argues with her and calls her "a fat fucking cunt." Based on my training and experience, these are coded messages trying to dissuade MKL from assisting in the prosecution of the crimes charged in 2020CF0617.

WHEREFORE, based on this substantial information, the State believes that the defendant engaged in this conduct with intent to interfere with the orderly administration of justice and tried to dissuade MKL from assisting in the prosecution in these matters or testifying at trial, in violation of Wis. Stat. ss. 940.42 to 940.44. As such, the State moves the Court for an order rescinding the defendant's custodial communication privileges, with the exception of attorney- client communication.

At the initial appearance the court granted the motion by the state and the defendant was present and personally ordered the defendant to have no contact with MKL pursuant to this order regardless of being in custody or not. This order has been in place since that date and was in place on the dates in counts 1-4 above. This order was in effect through all the above dates.

On January 25, 2022, complainant was assigned to investigate the above named defendant. On Wednesday, February 2, 2022 complainant interviewed MKL (DOB 3/15/67) in the Safety Building at 821 W. State St., Room 421, Milwaukee, WI. MKL stated she last had contact from Lonny Mayer on 09/08/21 when he left her a voice mail message and sent her a letter not too long after, which she turned over to Investigator Wilkerson.

Complainant asked MKL to tell me how she and Mayer met and to describe their relationship.
MKL stated she first met Mayer at a concert at AJ's in Muskego in October of 2015. She recalled him being "pushy" and wanting to come over to her place right away. This caused her not to want to get closer to him. About a year later, they randomly ran into one another and started to talk. Mayer told her he had a condo and they started to "hang out" more.

MKL stated Mayer had a full-time job in heating/cooling and was driving a black Honda. He rented a condo in Franklin on Drexel Ave. She was living in Greenfield on Allerton Ave. at the time. Her daughter Megan Schwartz with her children were living with MKL.

MKL stated she and Mayer got closer and she started to spend nights at his place in Franklin. MKL stated Mayer was constantly with her and did not allow any space between them and would insist on dropping her off in the morning at her residence on the way to work and to pick her up at work.

MKL stated she did not think they were living together because she had her own residence.

MKL stated Mayer's behavior escalated to the point that she had to call her friend Tiana to come get her. MKL stated after placing a call to Tiana from Mayer's apartment, Mayer came home in a rush and grabbed her neck and pulled her hair, telling MKL she was not free to leave. MKL called her friend Tiana back and told her not to come over. MKL did not report this violent episode and thought it was several months into their relationship.

MKL stated she learned Mayer had hidden cameras in his apartment when he called her once while she was at his place and told her he couldn't see her. MKL stated she never learned where the cameras were. MKL had trouble verbalizing how this discovery made her feel but she was crying as she were recalling this event.

MKL stated she attempted to leave Mayer's apartment multiple times but each time she stepped foot outside the door, he grabbed her by the hair and pulled her back inside. MKL stated Mayer repeatedly told her the only way she would leave his place was if she were dead. MKL had trouble verbalizing her feelings once again and was crying as she spoke. MKL stated she did not think she would ever be able to get away from him.

MKL recalled a time she attempted to leave Mayer. She stated her car was at Mayer's place, she packed her things and left Mayer's apartment in a hurry. As she was driving down on S. 27th St., Mayer caught up to her in

his car and was “trying to run me off the road.” In her attempt to get away from Mayer, MKL stated she almost hit another car. MKL performed a U-turn hoping to get away from Mayer but he caught up to her along with the person whose car she almost hit. MKL stated she pulled her car over thinking that man would help her get away from Mayer.

MKL stated the man was angry with her for almost hitting his car and did not do anything to help her when Mayer came up, pulled her out of the car by her hair and pushed her into his car. Mayer drove them back to his apartment, leaving MKL’s car on the side of the road.

MKL stated her first successful attempt to leave Mayer was in early August of 2017, when she drove her car to meet her friend Sarah. Sarah called the police and MKL’s parents. MKL stated that was the same day MKL changed the locks on her apartment door and made a police report with Greenfield PD (IR# 17-002347).

MKL stated she learned Mayer secretly obtained a copy of her apartment key. She stated he appeared in her apartment one night after she locked the door. MKL asked him how he got in and Mayer said she left the door unlocked. MKL stated she knew with certainty that she had locked the door. MKL stated Mayer later confessed that he had made a copy of her apartment key.

Complainant reviewed the Greenfield PD report # 17-002046 regarding the incident on 07/10/17 with MKL. MKL stated she remembered that incident and stated she was at her apartment with her daughter Megan when Mayer and his friend Michelle Leon showed up together. MKL stated Mayer was always under the impression MKL was cheating on him and always wanted to check her phone. Mayer was struggling to take MKL’s cell phone from her hands and in the process bit her lips to stun her into letting go of the phone. MKL stated Mayer bit her lips hard.

I asked MKL to clarify who Michelle Leon was. MKL stated she never did find out the true nature of the relationship between Mayer and Leon because Mayer kept avoiding the topic and just referred to Leon as his friend. MKL stated she came to call Leon “Lonny’s puppet.”

MKL stated the reason she later lied to the police saying the incident didn’t happen was because Mayer had threatened her. She could not recall the threat specifically and stated Mayer always threatened to kill her family.

Complainant stated that she then reviewed another reported incident MKL made to the police from 8/04/17 (IR# 17-002347), MKL stated she was afraid to provide details regarding the assault to the officer because she was afraid of Mayer’s retaliation. MKL stated that the day before (08/03/17), while she was at Mayer’s residence, in an attempt to prevent MKL from leaving, Mayer grabbed her by the throat. MKL stated Mayer would always grab her throat with his fingers digging around her trachea MKL stated Mayer grabbing her in such a way made it impossible to take a breath.

MKL stated she spent that night at his place and the next morning (8/4/17) after Mayer left for work, she packed up her belongings and called her friend Sarah to come get her. MKL stated Sarah picked MKL up and then called the police after seeing the bruises on MKL’s neck.

That same day (8/4/17), MKL stated Mayer called her parents calling MKL a “crack whore” and posted a nude picture of MKL on his Facebook account (Greenfield PD # 17-002357) calling MKL a “crack whore.”

MKL stated she took the nude photo of herself in Mayer’s bathtub some time before 08/04/17 and sent it to him as a gesture of love and devotion. MKL stated Mayer posted the picture on his Facebook page without her consent. MKL stated it was taken down a short time later.

MKL stated this photo was extensively discussed between her and Mayer over the jail calls shortly after he was incarcerated. MKL stated Mayer was trying to get her to say it wasn’t her in the photo. MKL stated Mayer did admit to her over the phone that he was the one who posted that photo on Facebook. MKL stated Mayer was pressuring her to drop the charges related to the nude photo and MKL succumbed to Mayer’s pressure causing her to call the police taking back her original statement.

MKL stated she continued to accept Mayer's calls from jail because if she didn't, he would repeatedly call her at work and she was afraid of losing her job. MKL stated her employer had already called the police on Mayer for calling repeatedly and harassing MKL. MKL stated Mayer "won't leave you alone."

It should be noted that West Allis Police Department has a record of this harassing contact in 2017 and Greenfield PD issued a citation to Mayer for harassing use of a telephone in Aug of 2017 (citation # 7K80ZN3P52).

Complainant knows that the defendant, Mayer was on extended supervision during the time he and MKL were in a relationship. MKL stated after Mayer was revoked and was serving his revocation time in prison, she continued to accept his calls and letters. Her feelings for Mayer were rekindled by the promise of his change upon release.

MKL stated she and Mayer were planning on renting a hotel room together after his release. They picked a hotel in Waukesha because it offered the best monthly rate. MKL stated she paid for the hotel and gave up her apartment in Greenfield. MKL stated the hotel was the best option because she and Mayer had a no-contact order and MKL wanted to give her daughter an opportunity to get a fresh start on her own.

MKL stated Mayer was released in December of 2018 and they lived in the hotel in Waukesha for about a month and a half. MKL stated Mayer got a job right away in December and was driving his car (blue Camry), which MKL stored in her garage while he was incarcerated and paid a monthly premium of $438 for over a year. MKL stated she paid $1000 for the monthly hotel rent.

MKL stated shortly after Mayer's release, he went back to his "possessive, controlling and manipulative self." MKL stated he was verbally abusive to her and provided an example of Mayer getting mad at a grocery store for MKL buying something he did not approve of. MKL stated he got mad, left the store and left her stranded.

MKL stated that a few nights during their stay in Waukesha, she went to stay at another hotel to gain space from Mayer who always threatened to kill her family.

MKL stated she made a report to Waukesha PD after Mayer got angry at her for pulling on a blanket. MKL stated Mayer kicked her off their bed, kicked her in the chest, which she stated was very painful and hurt for many days after. MKL stated Mayer tried to kick her out of the hotel room but because it was about 2:00 AM, she stayed in and slept the rest of the night in a chair.

MKL stated the next morning she packed her belongings and went to Waukesha PD to make a report. While at the police station, after providing a statement, she went to the bathroom. While in the bathroom, Mayer called her asking where she was. MKL told Mayer she was at the police station. MKL stated Mayer started to yell at her, threatened to kill her parents because he did not want to go back to jail. This caused MKL to want to leave the station. MKL stated she received a citation for obstructing an officer as a result of refusing to cooperate.

After leaving Waukesha PD, MKL stated she went to stay with her parents. MKL stated after Mayer was back in custody, shortly after her report to Waukesha, she started receiving calls and letters from him. She did not save all the letters and turned over threatening ones.

MKL stated after Investigator Wilkerson put a stop to Mayer's contact, she was able to gain space and get some help from the Sojourner Peace Center.

MKL stated when she would not accept his calls, Mayer would have his friend Michelle Leon facilitate three-way calls and call her using a blocked number. MKL stated she learned it was Leon who was calling with a blocked number when MKL installed a phone unblocking app on her cell phone.

MKL is fearful that the defendant will harm herself or her family and feels harassed and threatened by the defendant as a result of the above actions. MKL did not consent to the defendant causing her pain or strangling her in the past.

January 24th Conduct

MKL stated the last time she saw Mayer was in court at 901 N. 9th St in the City of Milwaukee, Milwaukee County Wisconsin on January 24, 2022 MKL stated that she came to testify at his Preliminary Hearing and stated Mayer was being himself, "verbally aggressive and overly controlling." MKL stated she did testify at the defendant's preliminary hearing. That was for case 21CF5042, which the defendant was charged with the felony offense of intimidation of a witness, the witness being MKL. This is a felony offense. She recalled Mayer asking her a question about her grandchildren being taken away from her custody. MKL stated she "scoffed" at his question because he was the reason the kids were taken away.

MKL stated after the Preliminary Hearing in Judge Rosa's courtroom, she and V/W Kristin Raymond walked across the hall to Judge Havas' courtroom for another of Mayer's hearing, which was a trial for case 20CF617, which is a Milwaukee County Case where in the defendant is charged with multiple felonies including threats to injure, and felony intimidation of a victim, which is a felony and MKL is the victim of that offense

MKL stated she and Raymond sat down in the gallery behind Mayer. MKL stated Mayer's former Probation Officer Rose Larson was in the gallery also. MKL stated at one point Larson and Investigator Wilkerson had to leave the courtroom. While they (Larson and Wilkerson) were out of the room there was a heated discussion on the record between ADA Heitman, Mayer and the Judge. MKL stated she saw Mayer stand up, turn towards her and make a gesture using his right pointer finger sliding across his neck. MKL stated she took it to mean he was threatening to kill her. MKL asked Raymond if she saw it and Raymond said she did not. This occurred in room 504 of the Milwaukee County Court House On January 24, 2022 located at 949 N. 9th St. In the City of Milwaukee, Milwaukee County Wisconsin. Complainant knows that Milwaukee County Cases 20CF617, 21CF1421, 20CF4068 were all set to be tried on this day at this place. MKL was the victim in all three of those cases and was there to testify for those three cases. This was communication in violation of the contempt order as well.

June 16 Conduct

This complaint is further based upon the statement of MKL that she had recorded a video of Mayer threatening her on Zoom during a civil court matter. According to the CCAP records, Milwaukee County Circuit Court case number 2021CV005060, was heard on 06/16/22 in front of Honorable Sosnay, Br. 8, during which both MKL and the defendant appeared by Zoom. The issue of the no contact order was discussed on the record according to CCAP.

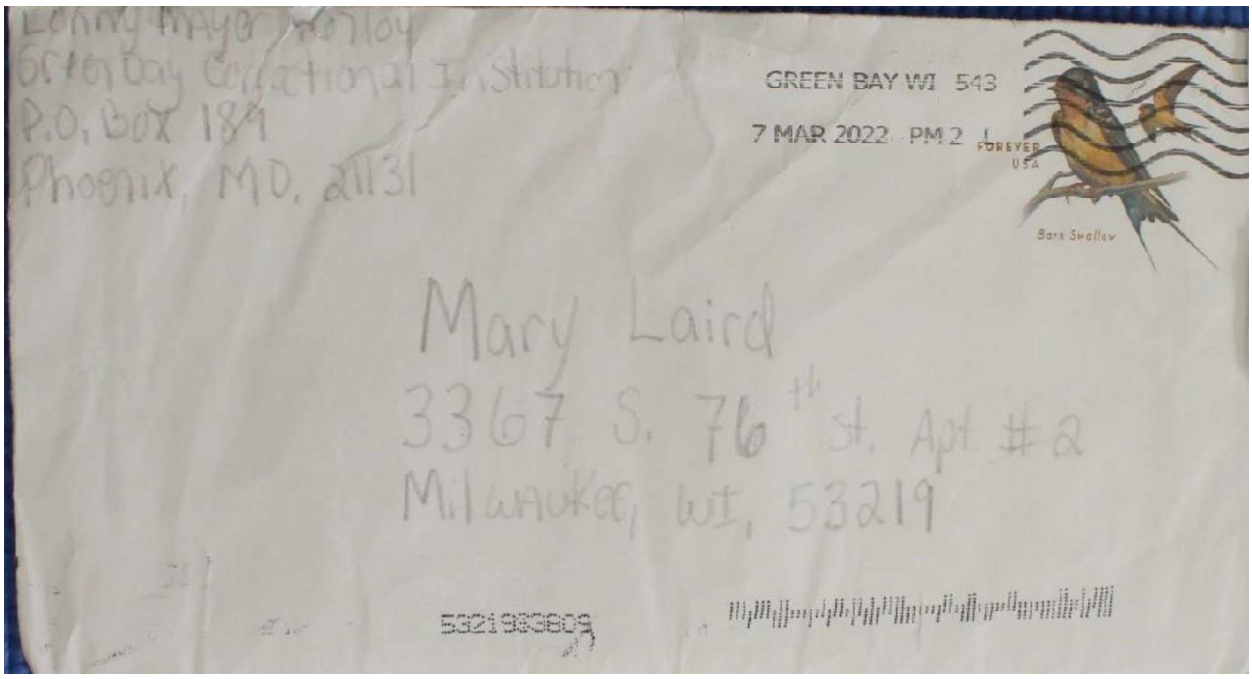
Related to the civil court case of 2021CV005060, MKL stated she recalled having a status hearing in July and appeared by Zoom from work. MKL stated she used her tablet to watch the hearing and used her personal cell phone to record the interaction she had with Mayer. A review of CCAP shows that there was a hearing in July, but a transcript from the date the video was taken shows that occurred on June 16, 2022. MKL was at her work which is located at 2323 S 102 St. West Allis Wisconsin 53227in the County of Milwaukee Wisconsin. This was a threat to a witness and extortion.

MKL stated she checked into the hearing on time and was waiting to be let into the courtroom via Zoom. While in the "waiting room," Mayer was admitted after her and they were alone in the virtual waiting room for about 10 minutes. They were able to see each other and hear each other. MKL. MKL texted a copy of the video on 06/22/2022 to the district attorney's office

March 7 Conduct

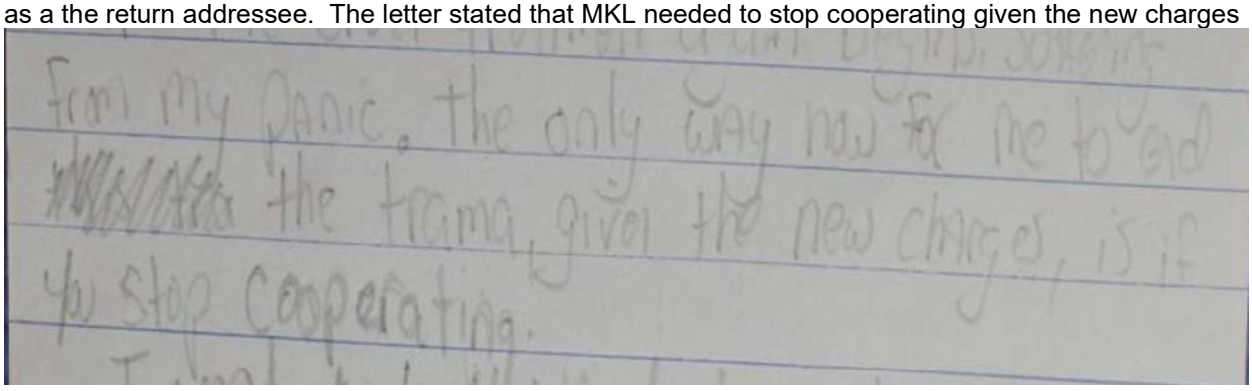
This complaint is further based on the following letters MKL stated were received by herself, her mother and her place of employment from March 7, 2022 to November , 2022.

MKL stated she received a letter pictured below at her above address from the defendant which was post marked March 7, 2022

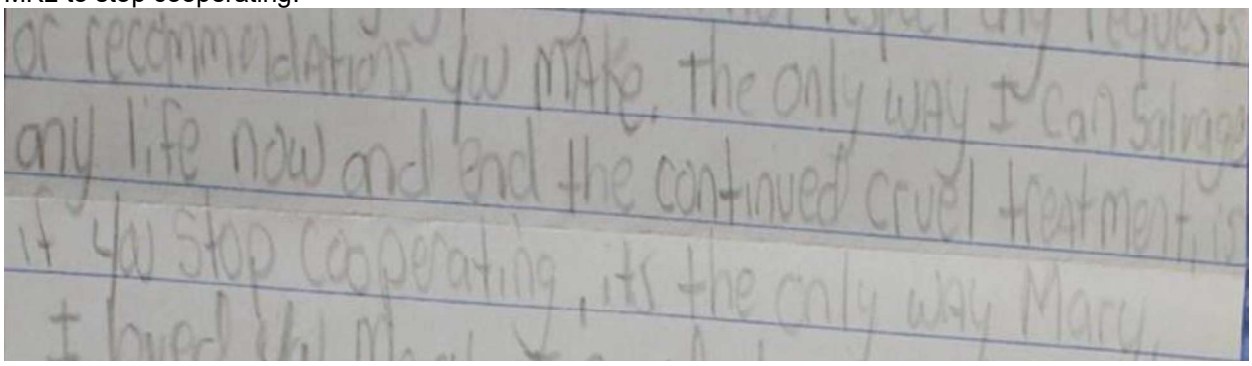


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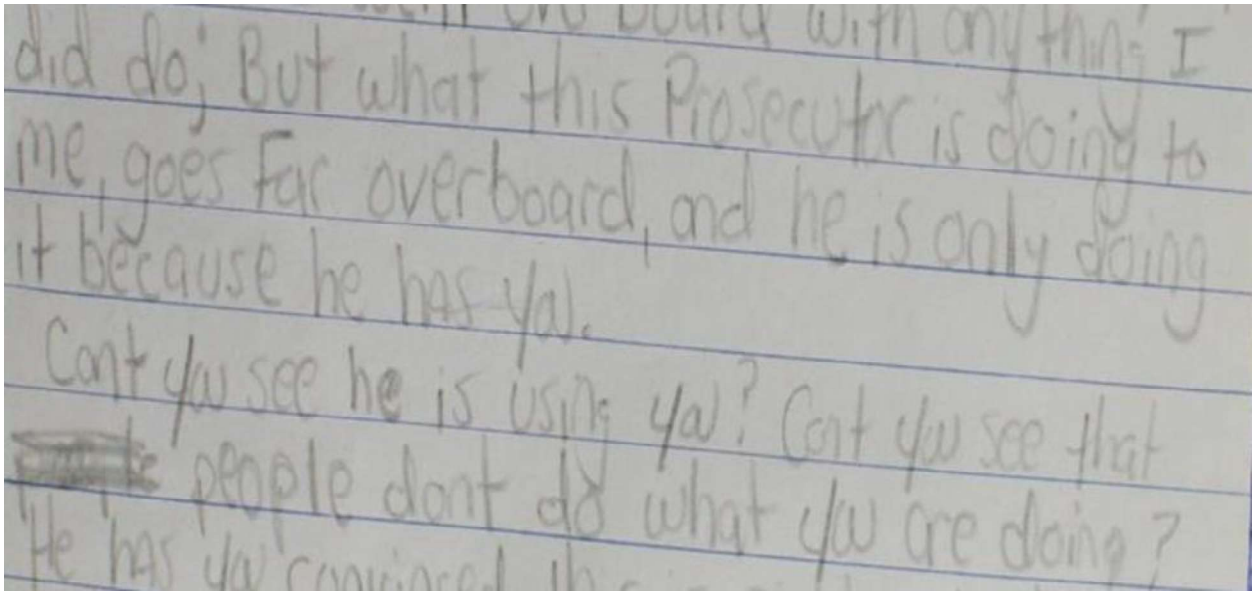
The envelope shows the letter came from green bay correctional where the defendant was housed and had him as a the return addressee. The letter stated that MKL needed to stop cooperating given the new charges



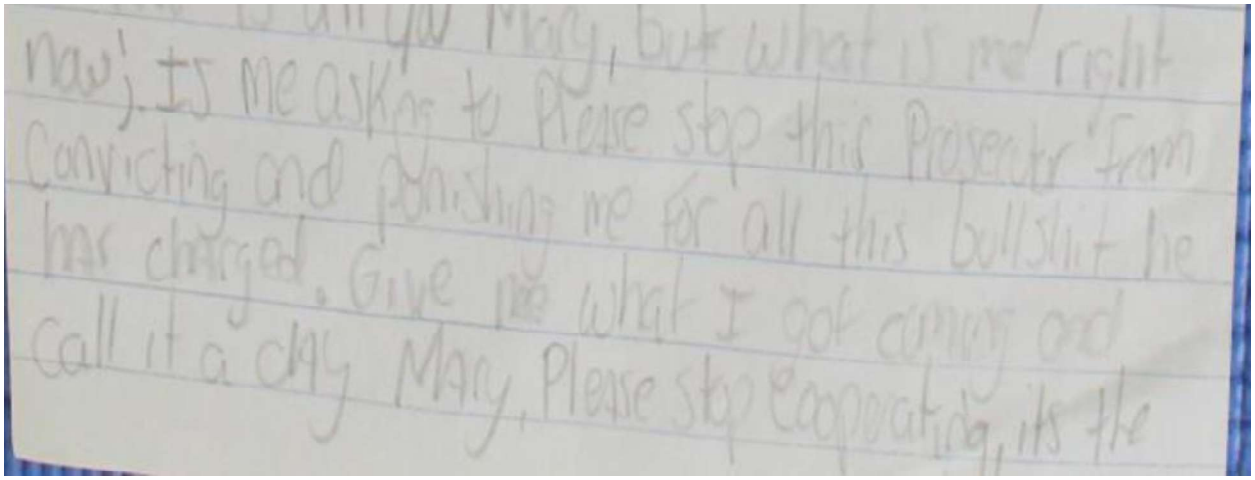
The defendant goes on to say in this letter that the only way he can salvage any life and end his suffering is for MKL to stop cooperating.



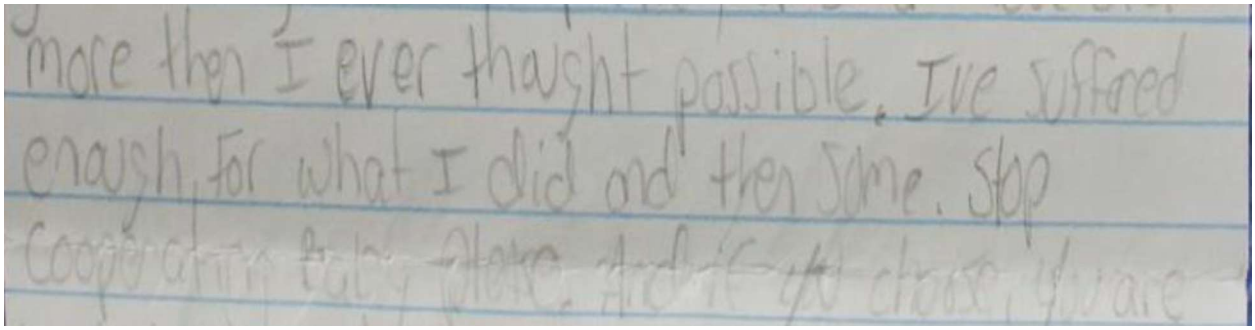
The defendant references that the only reason the charges are occurring is because the prosecution “has you” in reference to MKL.



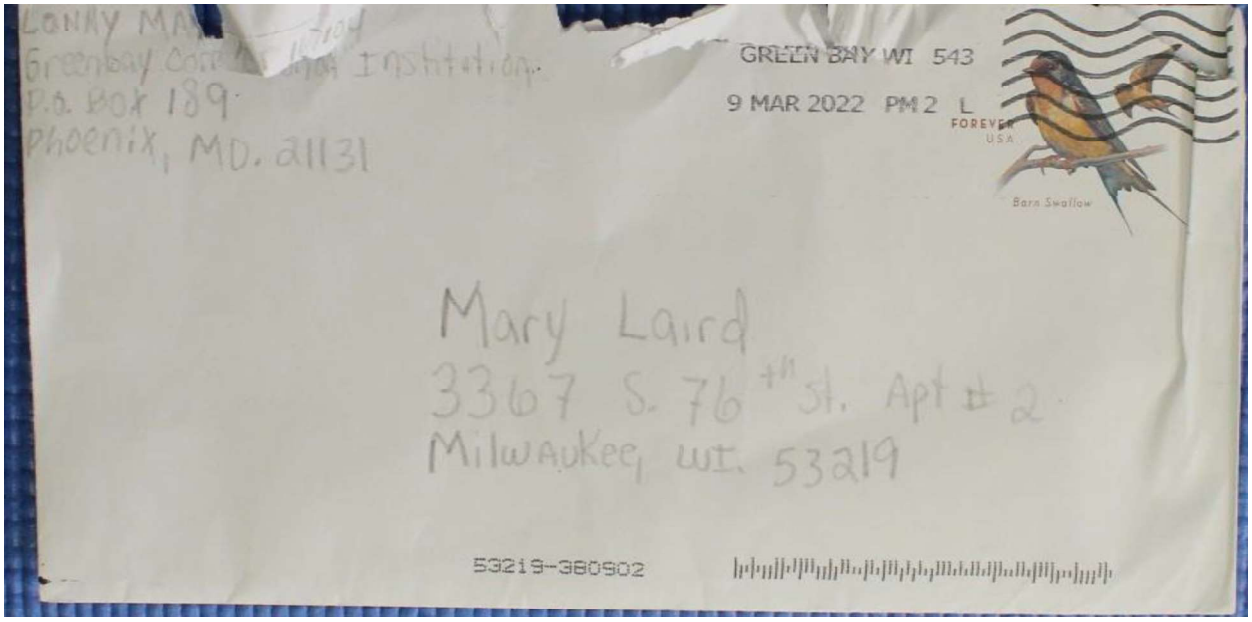
The defendant goes on in this letter by asking MKL to please stop him from being convicted and stop cooperating. This constitutes intimidation of a Witness, which would be in connection with several felonies.



The defendant closes this letter by saying to please stop cooperating.

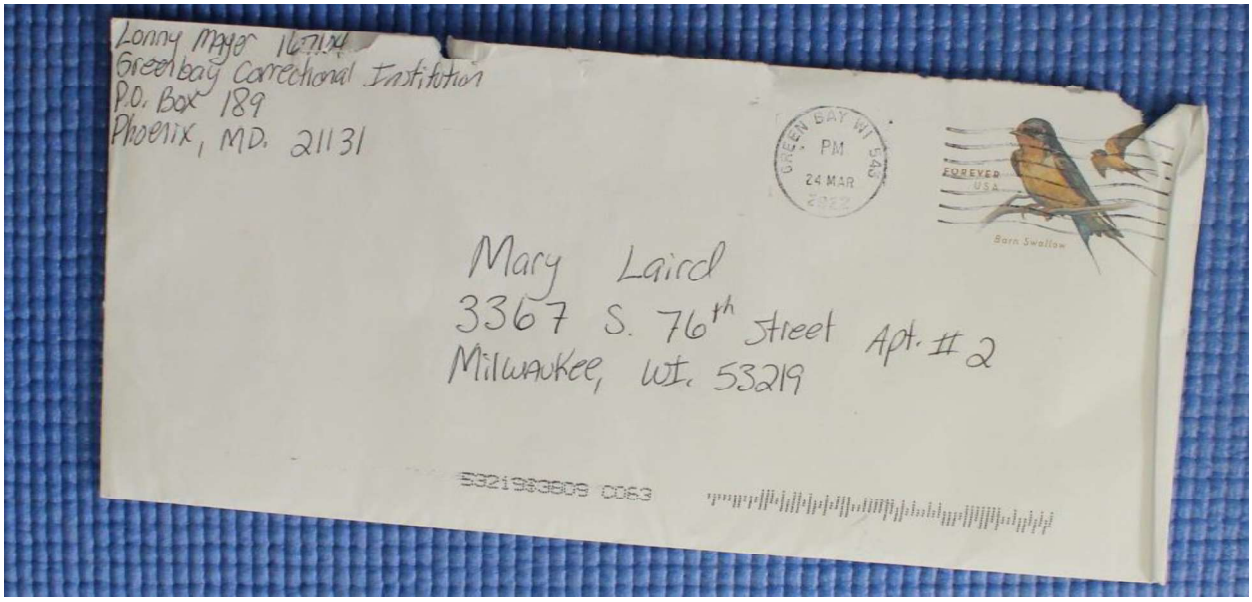


The defendant wrote another letter post marked March 9, 2022

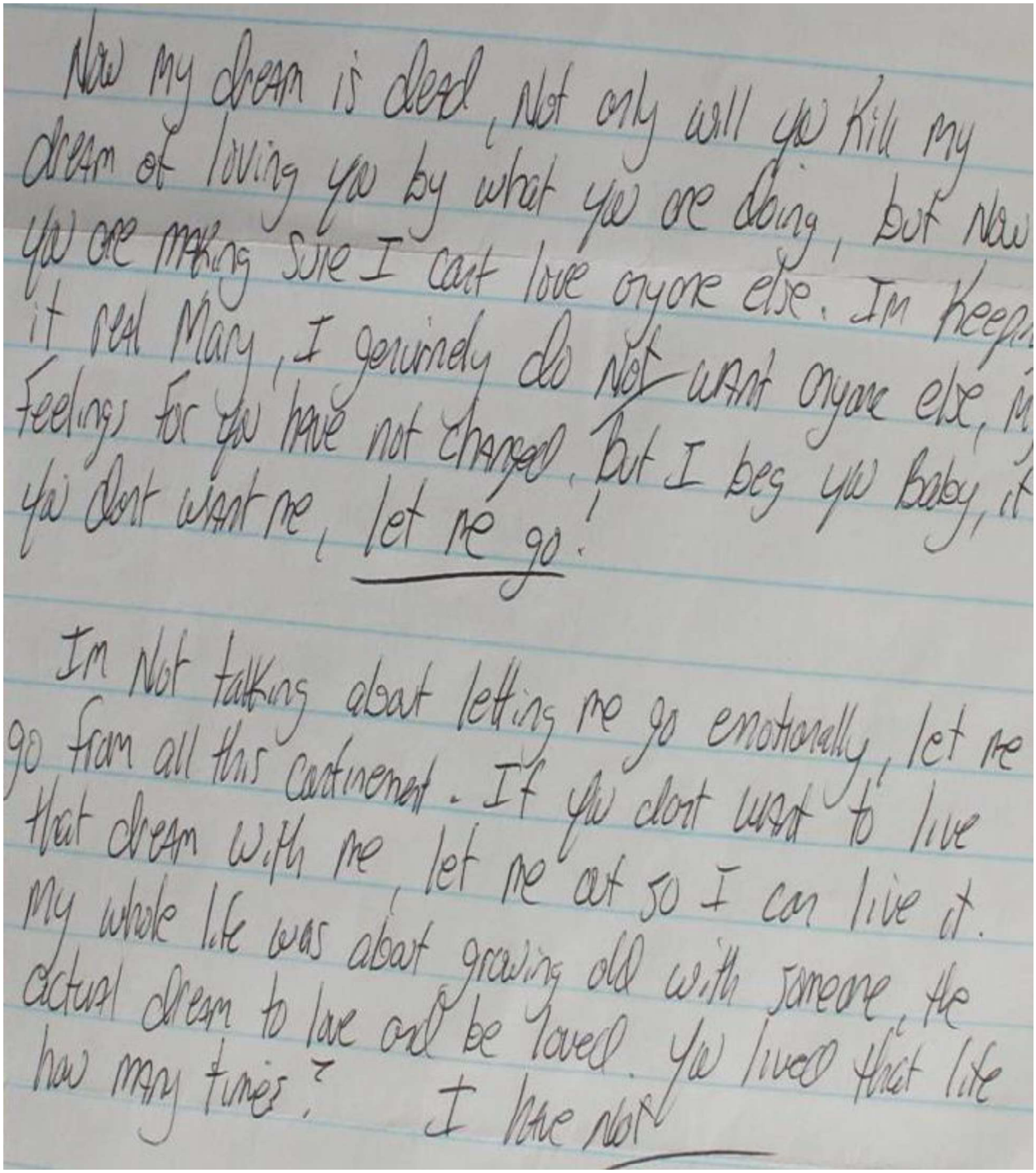


In this letter the defendant wherein the defendant denies conduct attributed to him, provides explanation for conduct he agrees with and tells MKL she is seeking revenge and it is not justified.

March 24 Conduct
The defendant writes MKL again and that letter is post marked March 24, 2022.



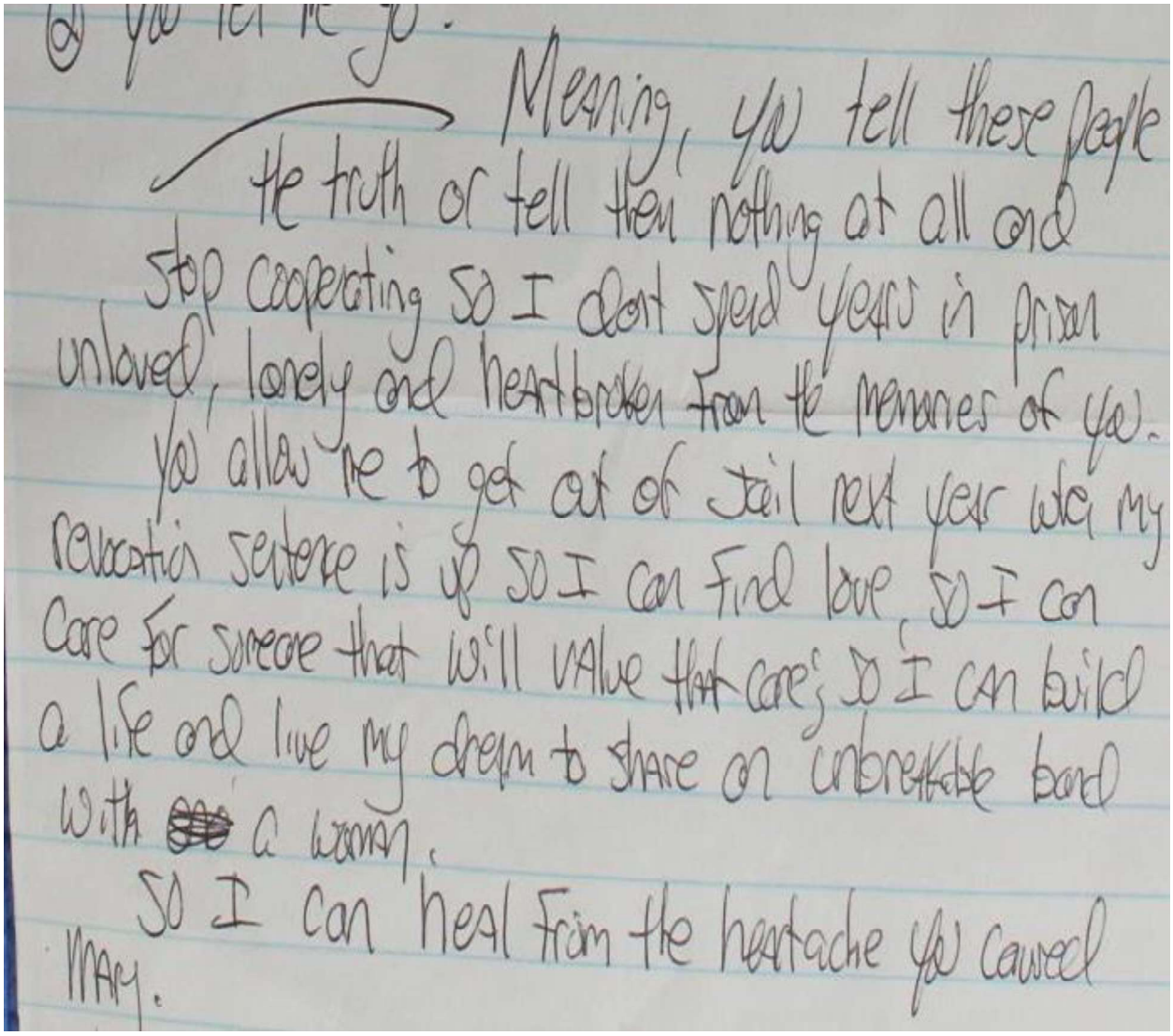
In this letter the defendant tells MKL to let him go from confinement, as he has been incarcerated as a result of revocation proceedings.



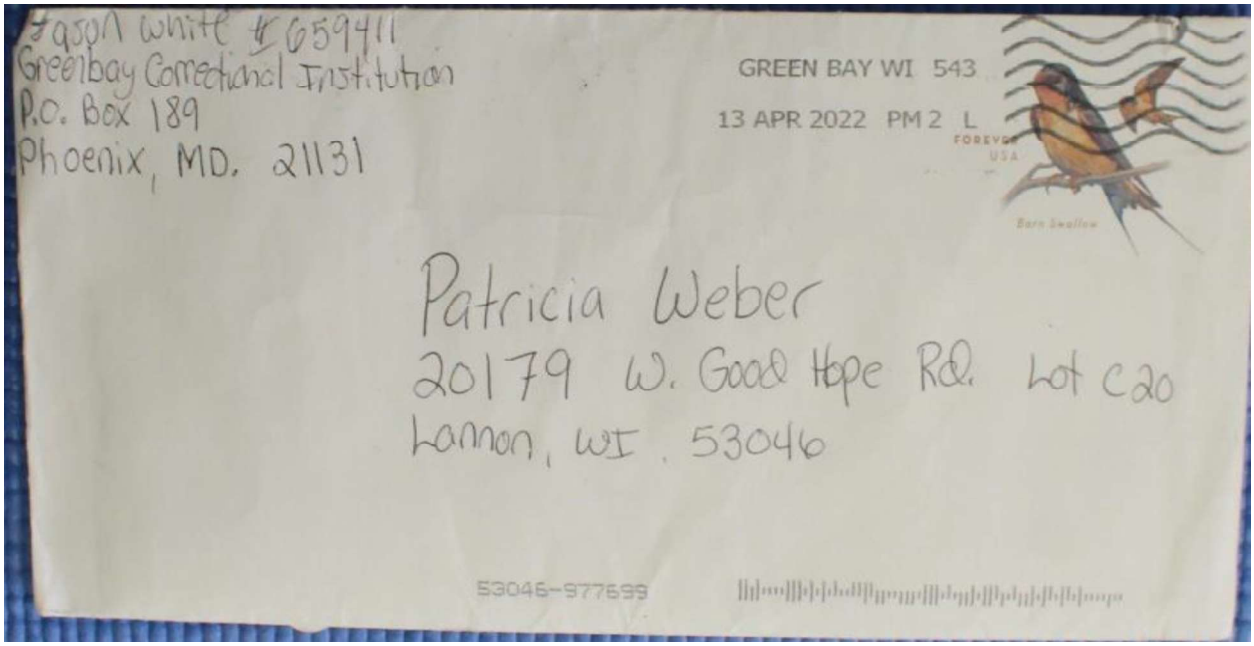
Now my dream is dead, Not only will ya Kill my dream of loving ya by what ya are doing, but Now ya are making sure I cant love anyone else. Im keepin it real Mary, I genuinely do Not want anyone else, my feelings for ya have not changed. But I beg ya Baby, if ya dont want me, let me go.

Im Not talking about letting me go emotionally, let me go from all this confinement. If ya dont want to live that dream with me, let me out so I can live it. My whole life was about growing old with someone, the actual dream to love and be loved. Ya lived that life how many times? I have Not

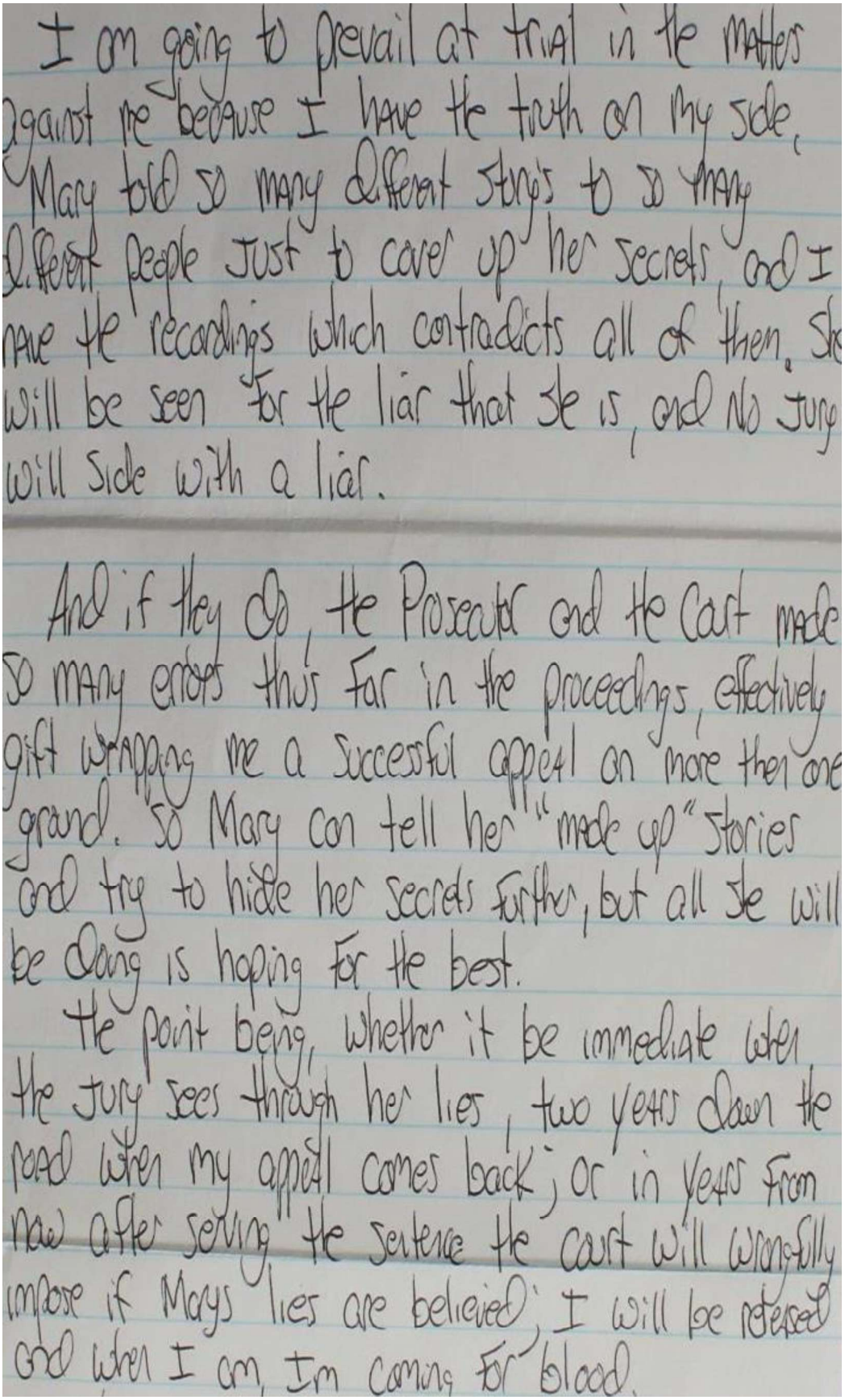
The defendant goes on to say that MKL should stop lying and stop cooperating. This again constitutes intimidation of a Witness, which would be in connection with several felonies.



On April 13, 2022 the defendant wrote MKLs mother a letter at her home address. MKL knows the defendant wrote the letter based on his hand writing and information contained in the letter despite the fact that the return address was a different inmate then the defendant, but was also an inmate at green bay correctional just like the defendant at the time the letter was sent.



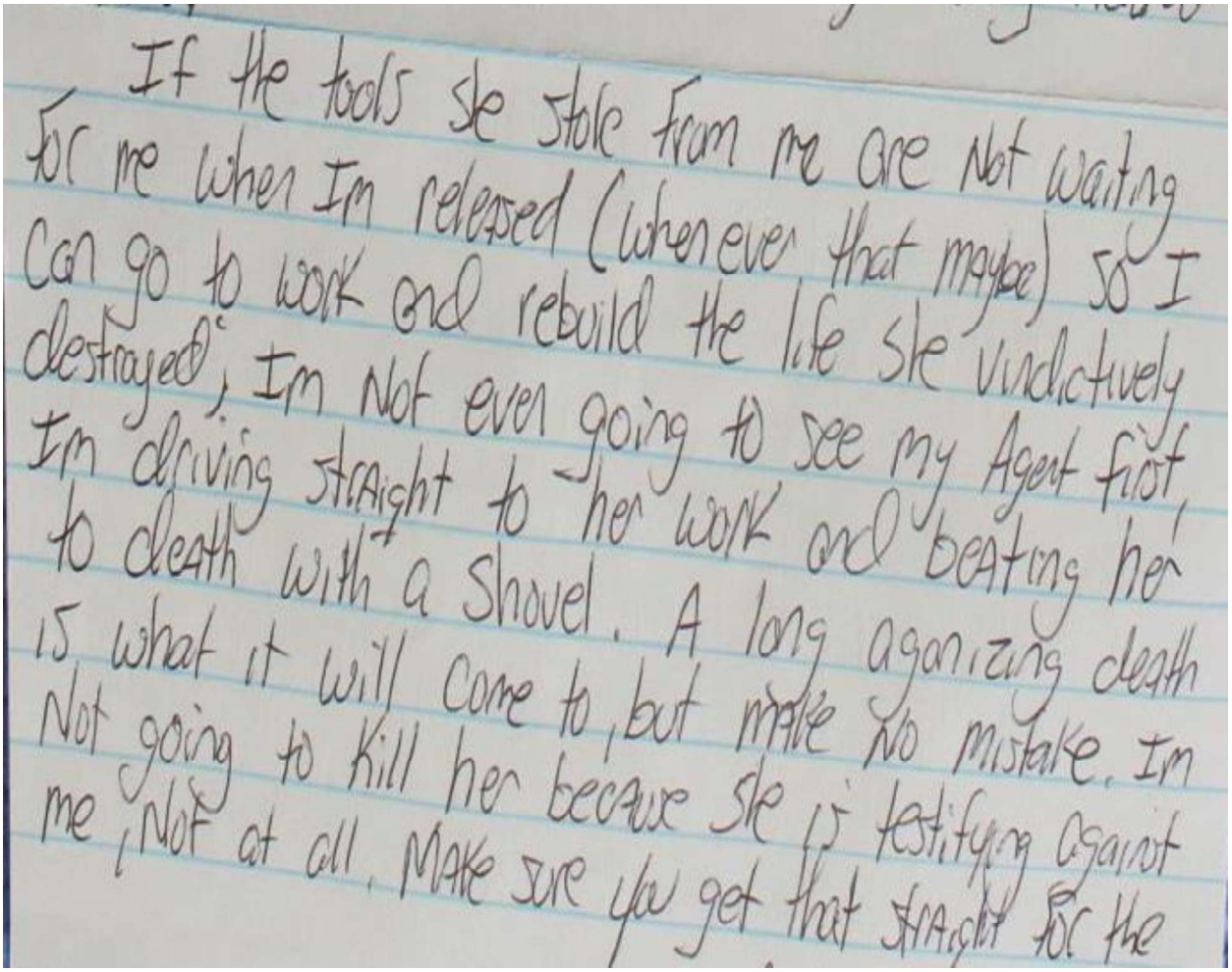
In this letter the defendant says the following:



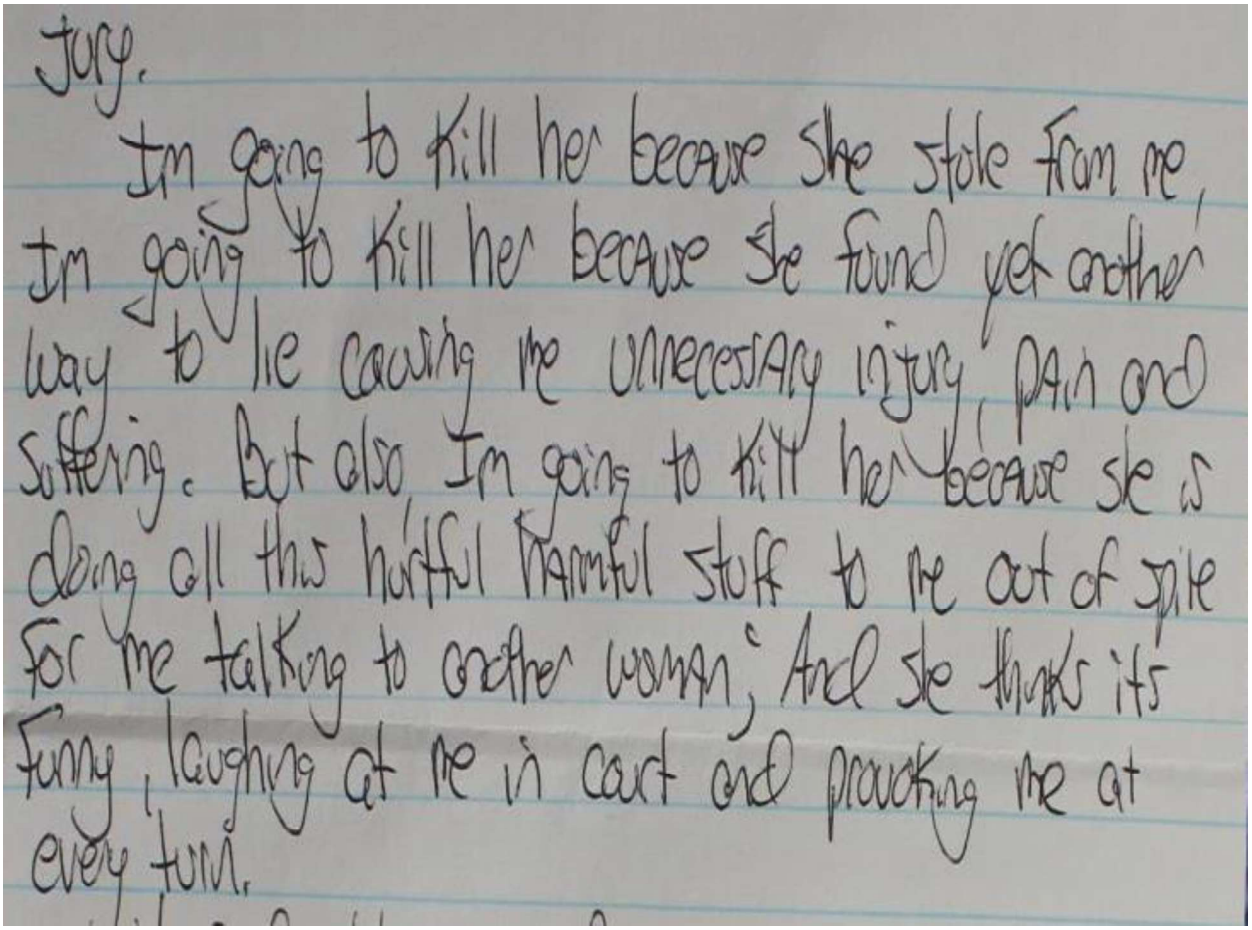
I am going to prevail at trial in the matters against me because I have the truth on my side. Mary told so many different stories to so many different people just to cover up her secrets, and I have the recordings which contradicts all of them. She will be seen for the liar that she is, and No Jury will side with a liar.

And if they do, the Prosecutor and the Court made so many errors thus far in the proceedings, effectively gift wrapping me a successful appeal on more then one grand. So Mary can tell her "made up" stories and try to hide her secrets further, but all she will be doing is hoping for the best.

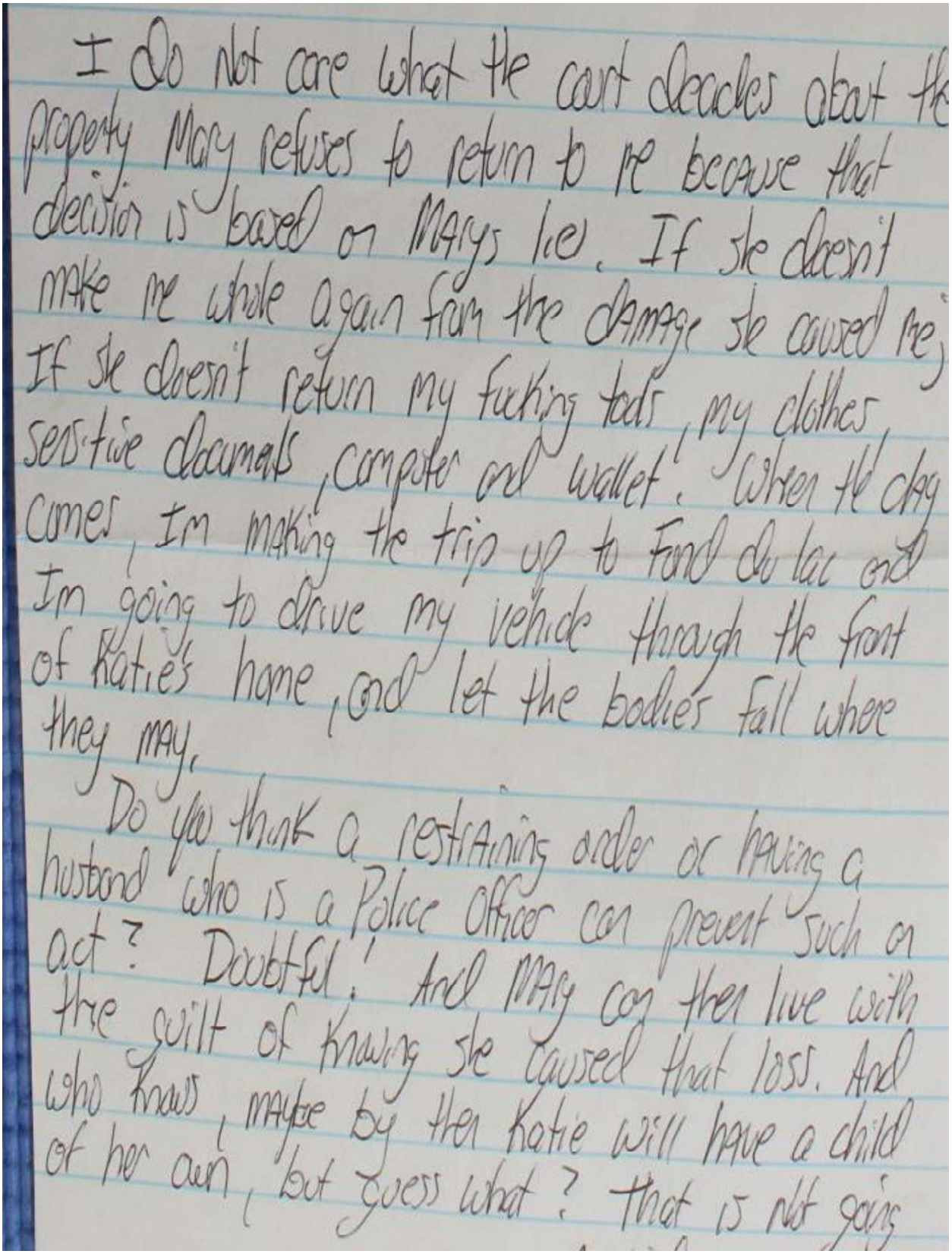
The point being, whether it be immediate when the Jury sees through her lies, two years down the road when my appeal comes back, or in years from now after serving the sentence the Court will wrongfully impose if Marys lies are believed; I will be released and when I am, Im coming for blood.



If the tools she stole from me are Not waiting for me when Im released (whenever that maybe) so I can go to work and rebuild the life she vindictively destroyed, Im Not even going to see my Agent first, Im driving straight to her work and beating her to death with a Shovel. A long agonizing death is what it will come to, but make No mistake. Im Not going to kill her because she is testifying against me, Not at all. Make sure you get that straight for the

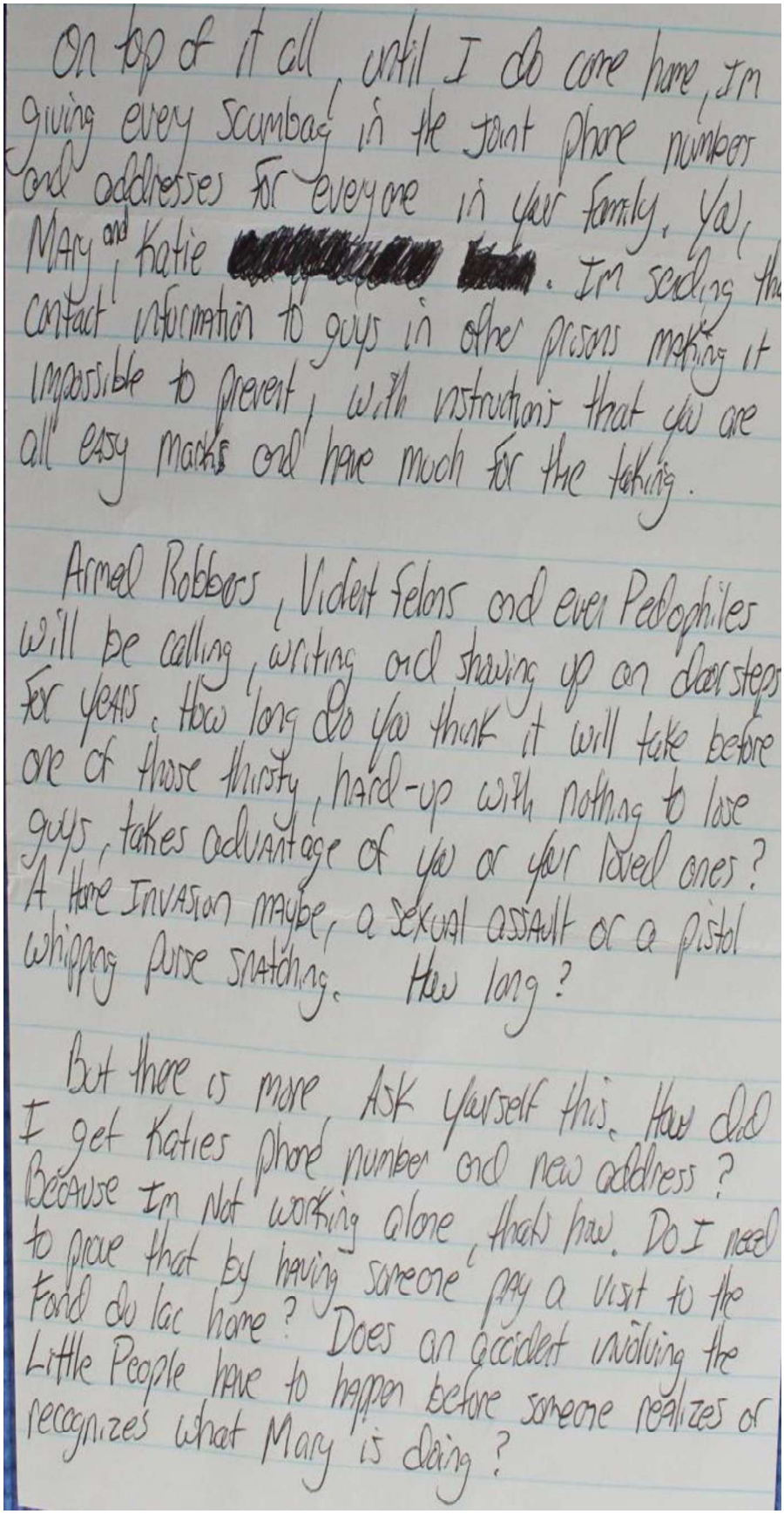

Jury.

Im going to kill her because she stole from me, Im going to kill her because she found yet another way to lie causing me unnecessary injury, pain and suffering. But also Im going to kill her because she is doing all this hurtful harmful stuff to me out of spite for me talking to another woman, And she thinks its funny, laughing at me in court and provoking me at every turn.



I do not care what the court decides about the property Mary refuses to return to me because that decision is based on Marys lie. If she doesn't make me whole again from the damage she caused me, If she doesn't return my fucking tools, my clothes, sensitive documents, computer and wallet. When the day comes, Im making the trip up to Fond du lac and Im going to drive my vehicle through the front of Katies home, and let the bodies fall where they may.

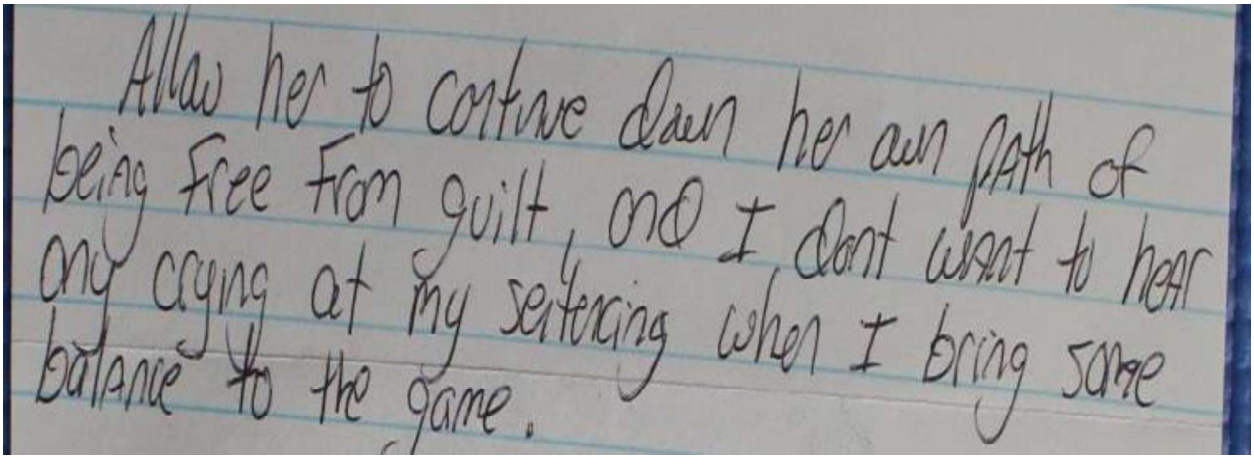
Do you think a restraining order or having a husband who is a Police Officer can prevent such an act? Doubtful. And Mary can then live with the guilt of knowing she caused that loss. And who knows, maybe by then Katie will have a child of her own, but guess what? that is not going



On top of it all, until I do come home, Im giving every Scumbag in the joint phone numbers and addresses for everyone in your family. Yes, Mary and Katie [redacted]. Im sending the contact information to guys in other prisons making it impossible to prevent, with instructions that you are all easy marks and have much for the taking.

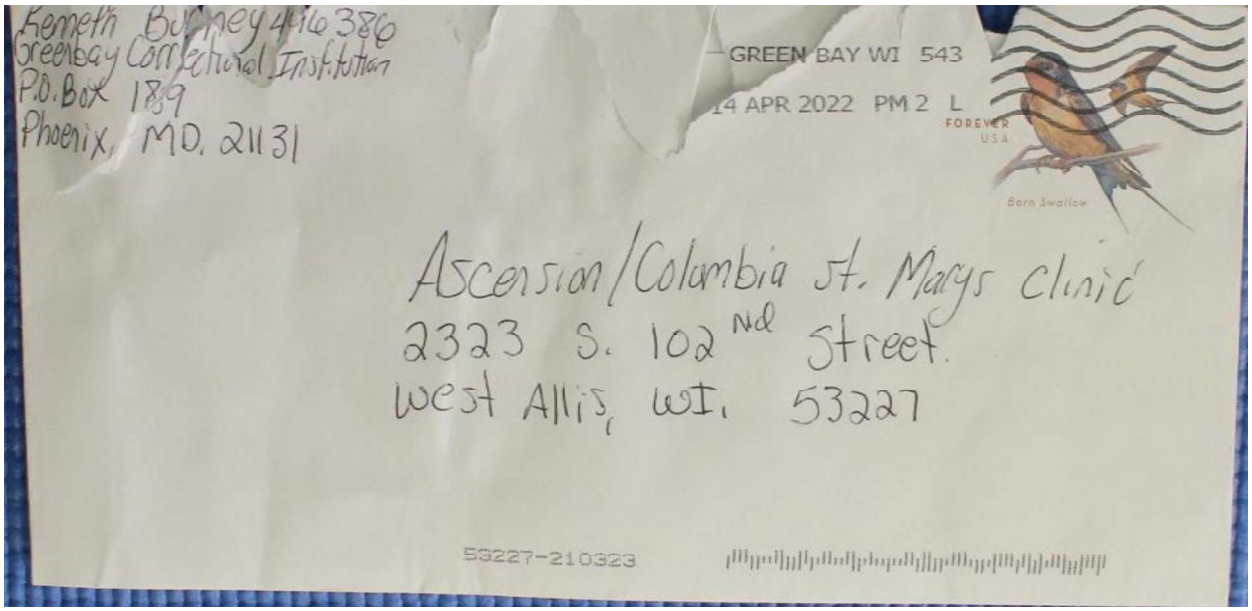
Armed Robbers, Violent felons and even Pedophiles will be calling, writing and showing up on doorsteps for years. How long do you think it will take before one of those thirsty, hard-up with nothing to lose guys, takes advantage of you or your loved ones? A Home Invasion maybe, a sexual assault or a pistol whipping purse snatching. How long?

But there is more. Ask yourself this. How did I get Katies phone number and new address? Because Im Not working alone, thats how. Do I need to prove that by having someone pay a visit to the Fond du lac home? Does an accident involving the Little People have to happen before someone realizes or recognizes what Mary is doing?

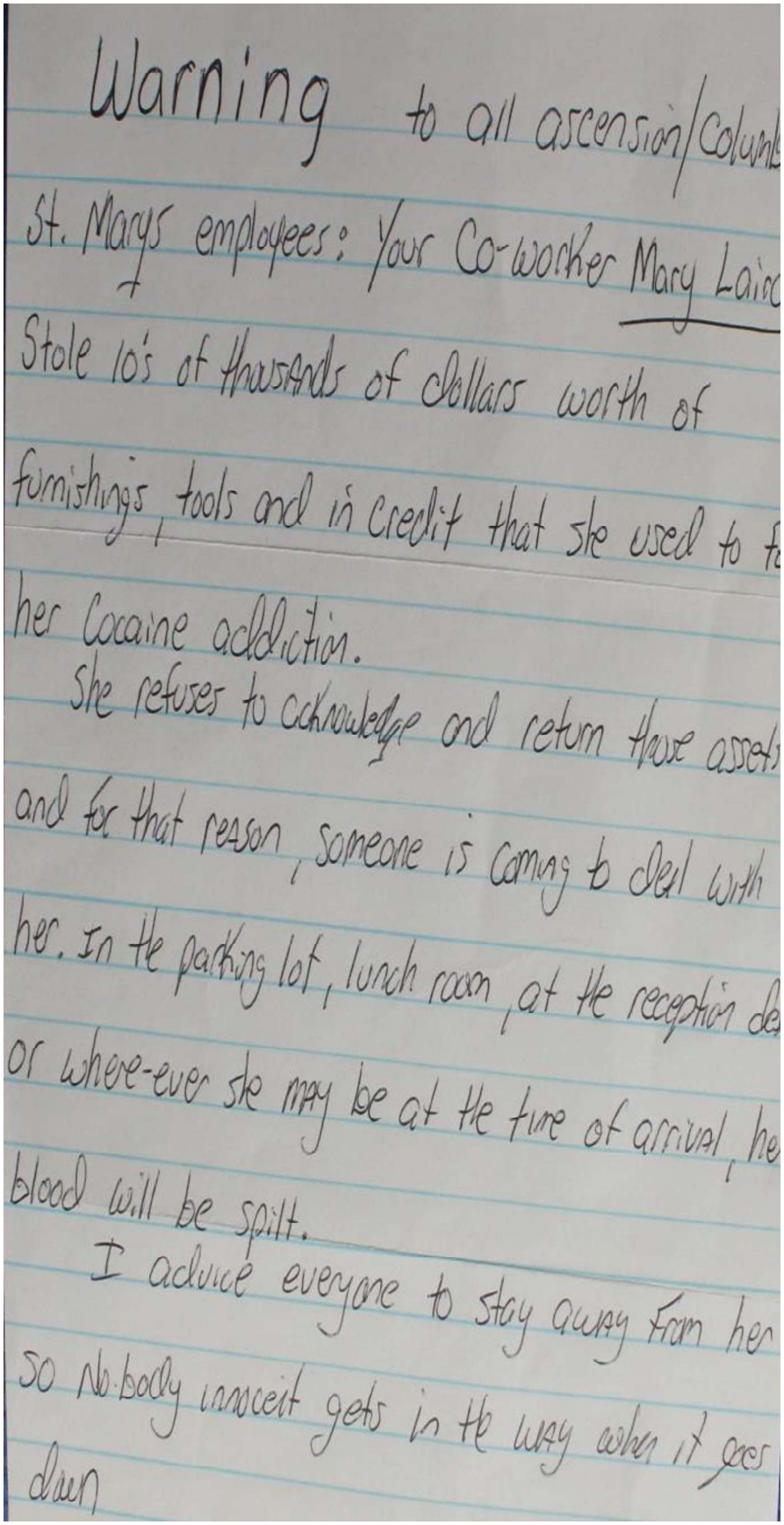

Allow her to continue down her own path of being free from guilt, and I dont want to hear any crying at my sentencing when I bring some balance to the game.

April 14 Conduct

This complaint is further based on a letter the defendant sent to MKL's employer on April 14. 2022 to 2323 S. 102nd St in West Allis Milwaukee County Wisconsin. MKL knows the defendant wrote the letter based on his hand writing and information contained in the letter despite the fact that the return address was a different inmate then the defendant, but was also an inmate at green bay correctional just like the defendant at the time the letter was sent.



In this letter the defendant writes:



Warning to all ascension/Columb

St. Marys employees: Your Co-worker Mary Laio

Stole 10's of thousands of dollars worth of

furnishings, tools and in credit that she used to f

her Cocaine addiction.

She refuses to acknowledge and return these assets

and for that reason, someone is coming to deal with

her. In the parking lot, lunch room, at the reception de

or where-ever she may be at the time of arrival, he

blood will be spilt.

I advice everyone to stay away from her

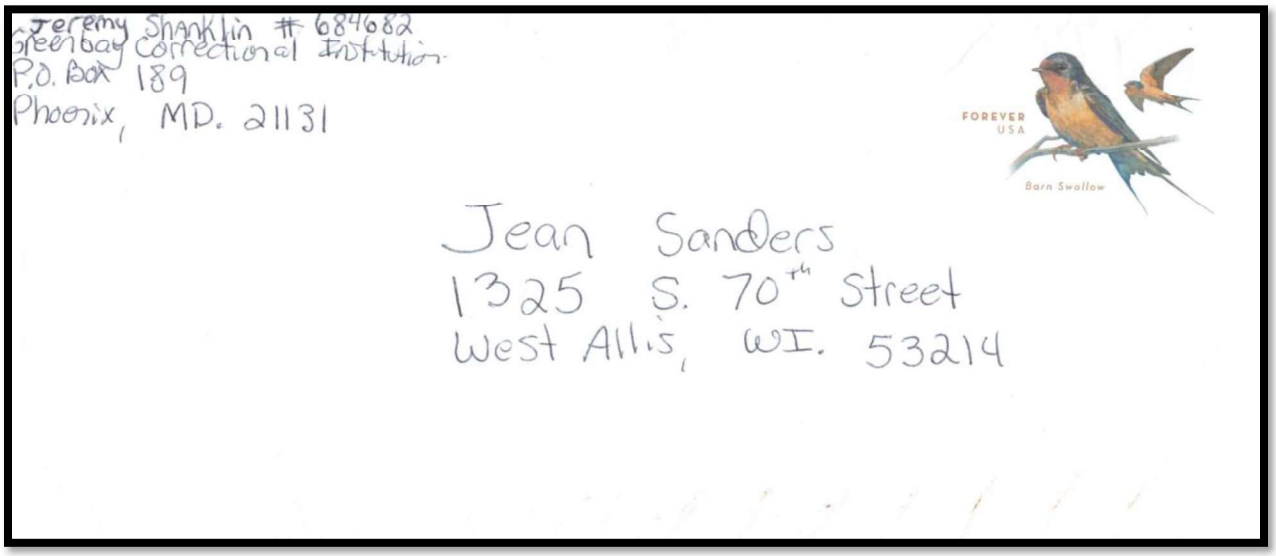
so No-body innocent gets in the way when it goes

down

This letter constitutes terroristic threats.

November 3 Conduct

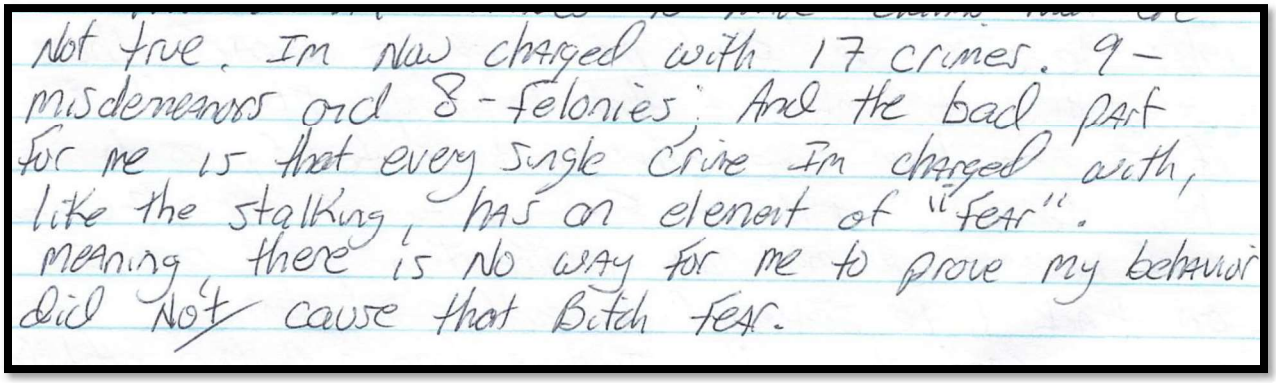
This complaint is further based on complainant's review of another letter the defendant attempted to send to a "Jean Sanders" at 1325 S. 70th St. in the City of West Allis, WI 53214. Complainant knows however that address is for a business owned by a known associate of the defendant Shawn Lang. Complainant states that reports from Green Bay Correctional indicate that the defendant attempted to have this letter sent on November 3 2022.


Jeremy Shanklin #684682
Greenbay Correctional Institution
P.O. Box 189
Phoenix, MD. 21131

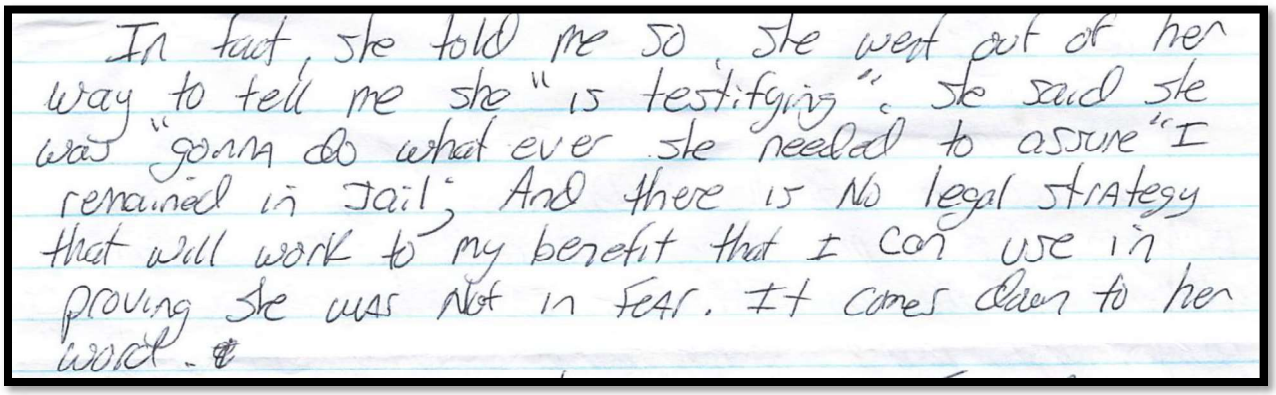
FOREVER USA
Barn Swallow

Jean Sanders
1325 S. 70th Street
West Allis, WI. 53214

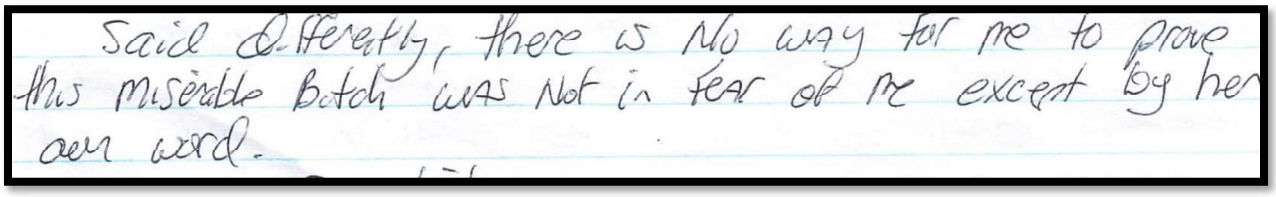
In the letter the defendant addresses the specific number of crimes he was charged with at the time in pending cases before the Milwaukee County Courts, he also provides the number of charges that are misdemeanors and the number of charges that are felonies. He also references that is charged with Stalking. The victim of the stalking is MKL as referenced above who is a witness in Milwaukee County and because of a witness by observing things in Milwaukee County Wisconsin.


Not true. Im Now charged with 17 crimes. 9-misdemeanors and 8-felonies. And the bad part for me is that every single Crime Im charged with, like the stalking, has an element of "fear". Meaning, there is No way for me to prove my behavior did Not cause that Bitch fear.

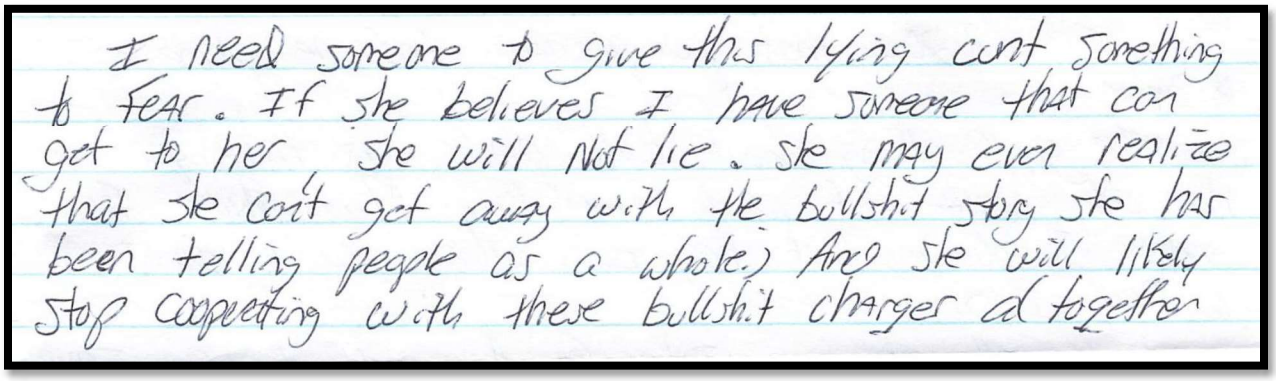
In this letter the defendant states that he is charged with stalking and that the prosecutor needs to prove and element of "fear" and "there is no way for me to prove my behavior did not cause that Bitch fear." The defendant goes on to say that there is no legal strategy that will work to his benefit that he can use to prove she was not in fear. The defendant states that MKL told him she was testifying,


In fact, she told me so, she went out of her way to tell me she "is testifying". She said she was "gonna do what ever she needed to assure "I remained in Jail". And there is No legal strategy that will work to my benefit that I can use in proving she was Not in fear. It comes down to her word.

The defendant writes that there is no way for him to win unless MKL says she was NOT in fear of him.


Said differently, there is No way for me to prove this miserable bitch was Not in fear of me except by her own word.

The defendant writes that if she, MKL, believes that he, the defendant, has someone who can get to her she will not lie and will stop cooperating and that it can be Lang himself or the "friend' he and Lang share.


I need someone to give this lying cunt something to fear. If she believes I have someone that can get to her she will Not lie. She may even realize that she can't get away with the bullshit story she has been telling people as a whole. And she will likely stop cooperating with these bullshit charges altogether

The defendant wrote examples of how Lang can do this:

Some dangerous sounding messages, either text or voice, will likely acheive the result. Let her know that if she gets on the stand and lies about me, even in the slightest, her and her family will be ~~death~~ dealt with.

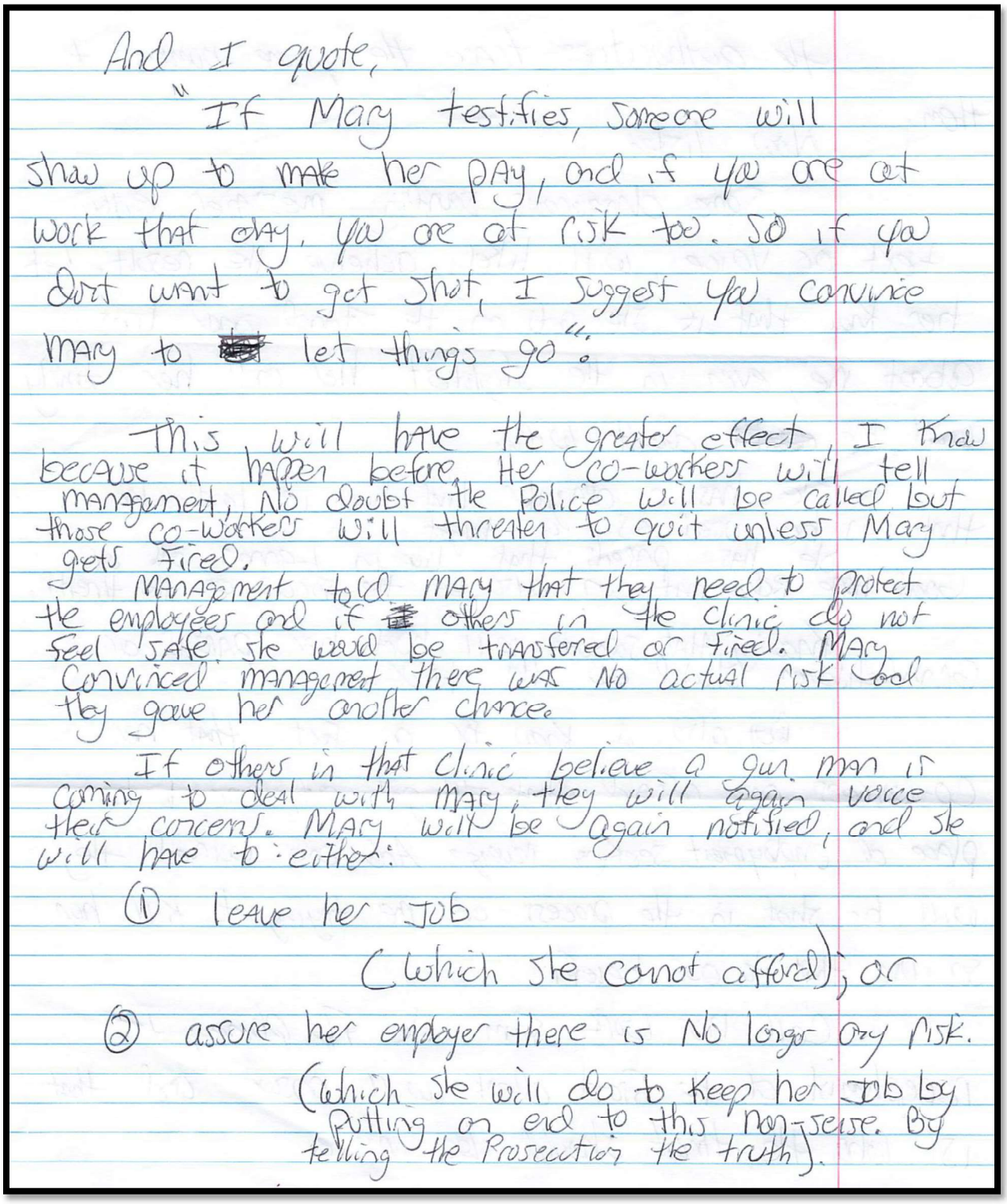
She has a daughter that lives in Fond du Lac that can be used as a target.

She has parents that live in Larson off of Good Hope Rd. that can also be the focus of the threats.

Knowing that someone will hurt her parents or Grandchildren should do the trick.

But also, I know for a fact that her co-workers are afraid that I'll get out, come to her place of employment seeking revenge. And are worried they will be shot in the process of me trying to kill her. So use that to our benefit.

Call her work from the flip phone, the receptionist at the front desk will answer and that is who the threat should be made.



And I quote,

"If Mary testifies, someone will show up to make her pay, and if you are at work that day, you are at risk too. So if you don't want to get shot, I suggest you convince Mary to [redacted] let things go".

This will have the greater effect, I know because it happen before. Her co-workers will tell management, No doubt the Police will be called but those co-workers will threaten to quit unless Mary gets Fired.

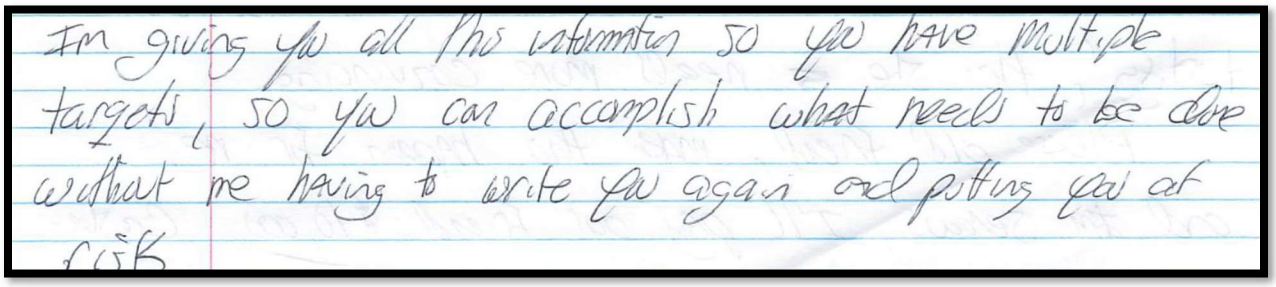
MANAGEment told MARY that they need to protect the employees and if [redacted] others in the clinic do not feel SAFE she would be transfered or fired. MARY Convinced management there was NO actual risk but they gave her another chance.

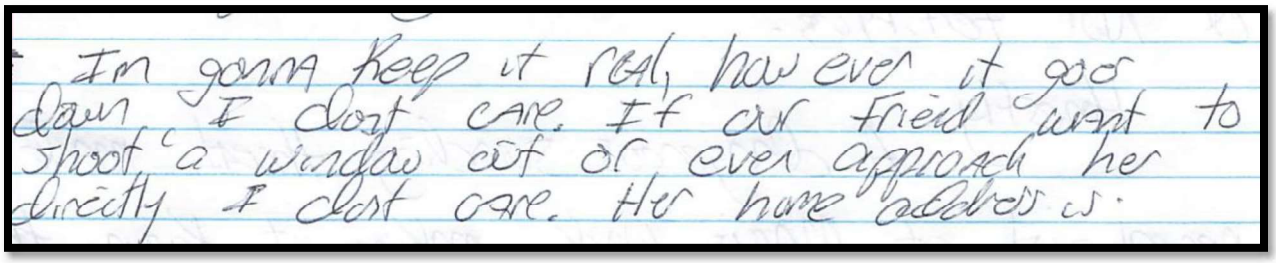
If others in that clinic believe a gun man is coming to deal with MARY, they will again voice their concern. MARY will be again notified, and she will have to: either:

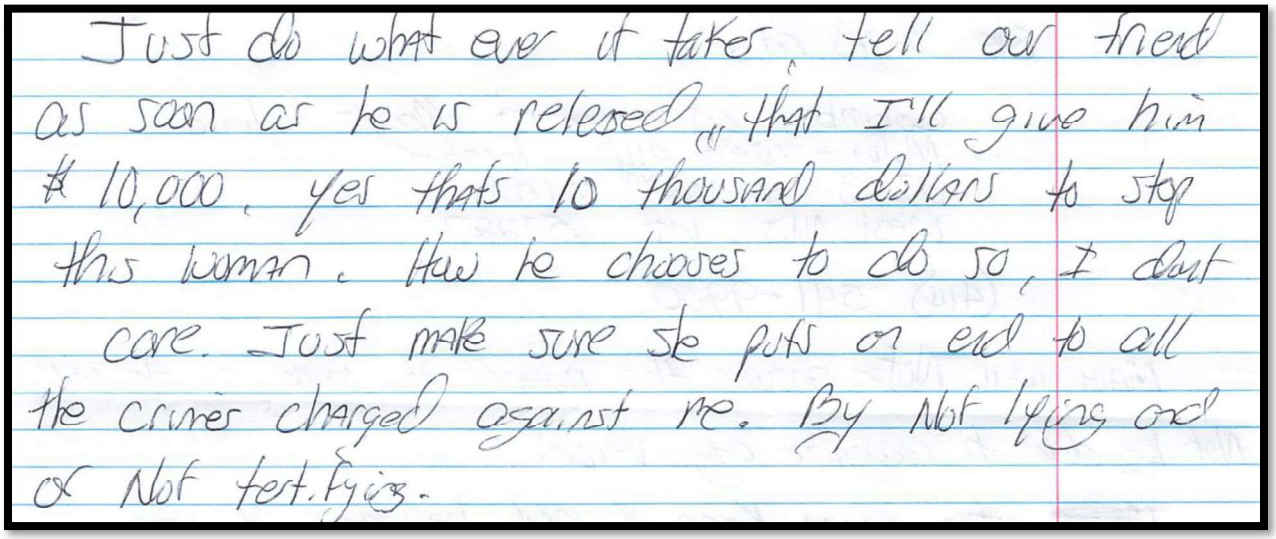
① leave her JOB (which she cannot afford); or

② assure her employer there is No longer any risk. (which she will do to keep her JOB by putting an end to this non-sense. By telling the Prosecution the truth).

The defendant then provides Lang with the name and address of MKL's employer and MKL's cell phone number and MKL's home address, where MKL's daughter lives, the daughter's name and the granddaughter's name . The defendant writes in this letter that he provided this information so Lang will have multiple targets.


I'm giving you all this information so you have multiple targets, so you can accomplish what needs to be done without me having to write you again and putting you at risk

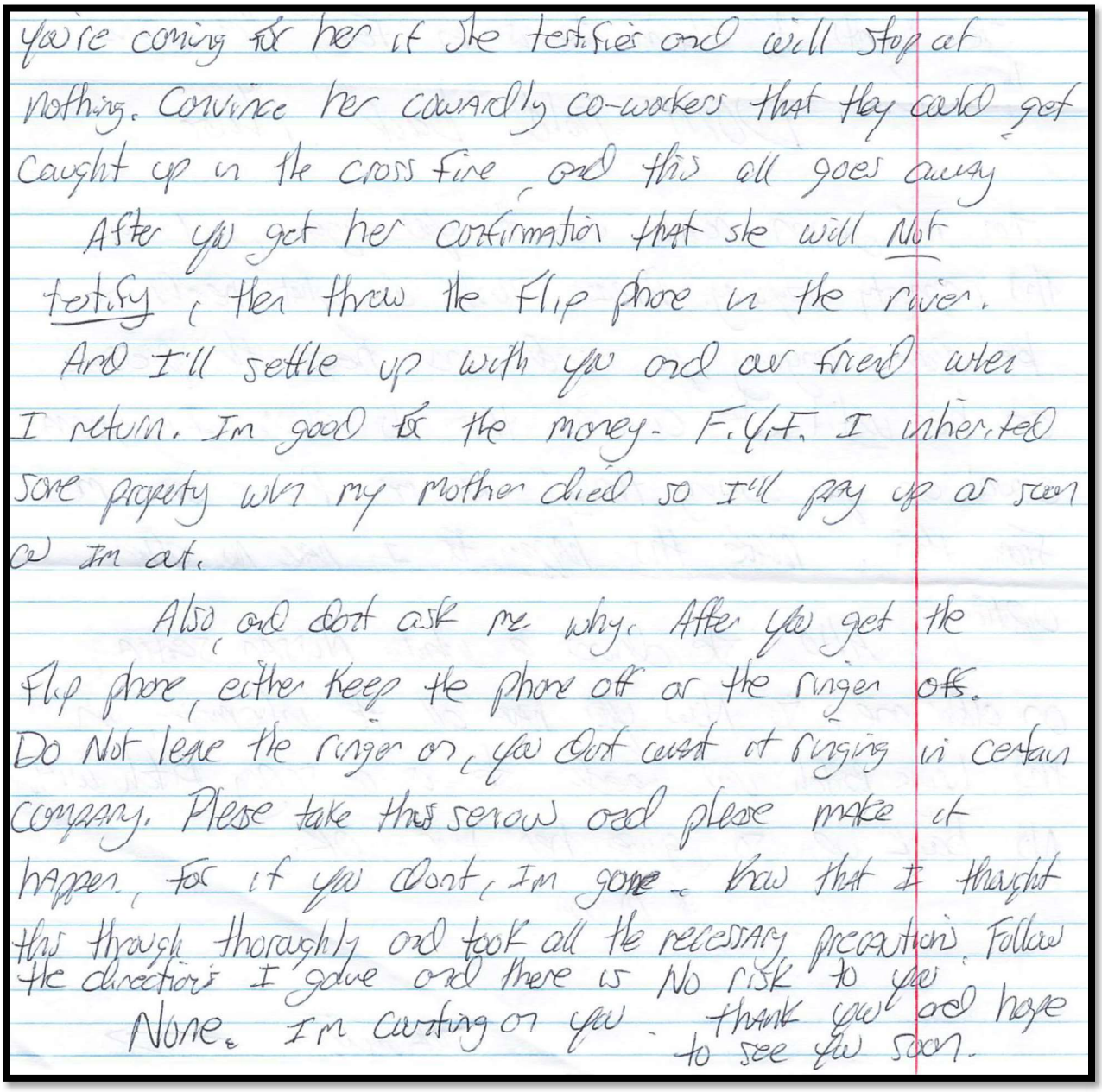

I'm gonna keep it real, however it goes down, I don't care. If our friend want to shoot a window out or even approach her directly I don't care. Her home address is.


Just do what ever it takes, tell our friend as soon as he is released, that I'll give him $10,000. yes that's 10 thousand dollars to stop this woman. How he chooses to do so, I don't care. Just make sure she puts an end to all the crimes charged against me. By Not lying and or Not testifying.

Honestly, A dangerous sounding threat made to the receptionist at MARY's work making it known that bullets will fly if she testifies and others are likely to be shot in the process. Will No doubt stop MARY from testifying and lying any further. SO I suggest you start there, then text her personal cell phone asking her specifically whether she still intends to testify. If she doesn't use the words "I wont testify", then she needs more convincing.

Please old friend, make this happen for me, and in serious, I'll pay our friend $10,000 Cash. as soon as I return home. or I'll pay you

she wants to claim she is in fear, then give her fear. Dont hold back, Please



you're coming for her if she testifies and will stop at nothing. Convince her cowardly co-workers that they could get caught up in the cross fire, and this all goes away.

After you get her confirmation that she will Not testify, then throw the Flip phone in the river.

And I'll settle up with you and our friend when I return. Im good for the money. F.Y.F. I inherited some property when my mother died so I'll pay up as soon as Im at.

Also, and dont ask me why. After you get the Flip phone, either keep the phone off or the ringer off. Do Not leave the ringer on, you dont want it ringing in certain company. Please take this serious and please make it happen, for if you dont, Im gone. Know that I thought this through thoroughly and took all the necessary precautions. Follow the directions I gave and there is No risk to you.

None. Im counting on you. thank you and hope to see you soon.

This letter than constitutes and attempt to intimidate and threaten MKL, who is a witness in a Milwaukee County Case given this county Jurisdiction.

June 1 Conduct

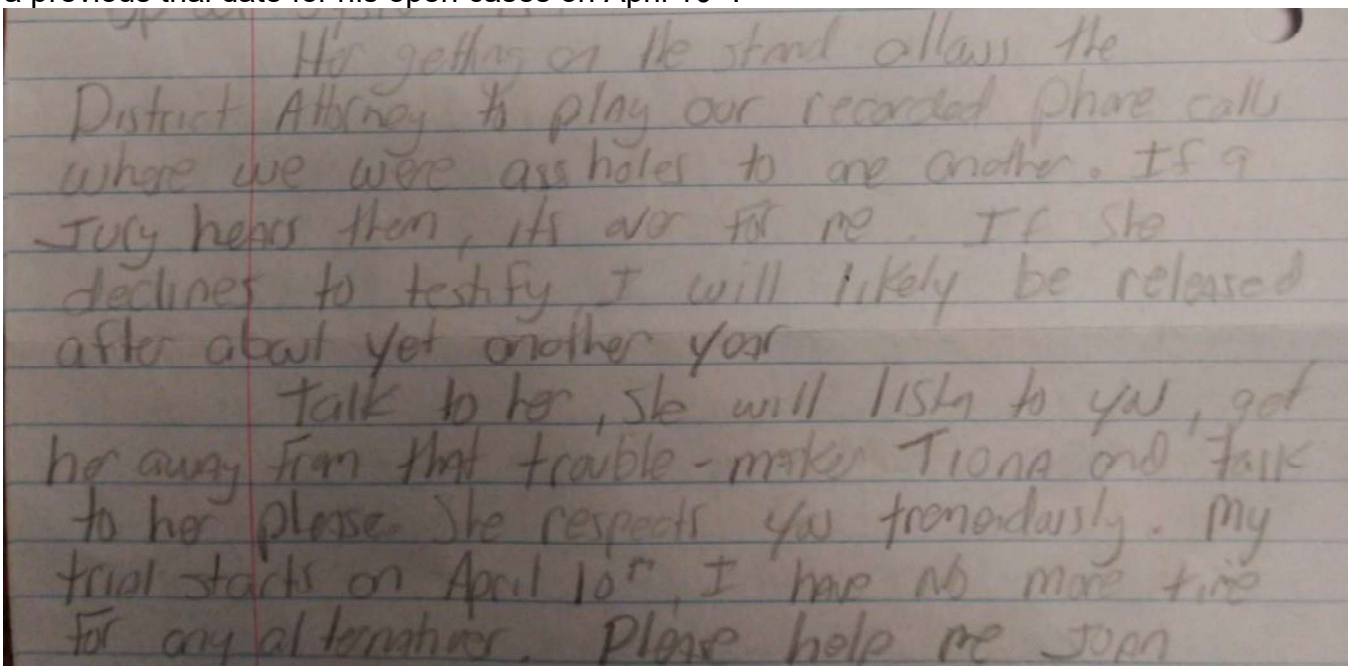
This complaint is further based on the statement of Deputy Taylor Rivers badge that on June 1st, 2023, he and Deputy Virgyl Maxwell, were assigned to duty in full uniform as Branch 10 in the Police Services Bureau Division, Courts Division located at 949 N. 9th Street in the City of Milwaukee, County of Milwaukee. Deputy Rivers stated that on that day he and Deputy Maxwell were acting within our official capacity as a law enforcement officer with our names affixed to our outermost carriers when the following incident occurred:

Lonny Allen Mayer (M/W 9-28-69) appeared in court in Room 504 at 949 N. 9th St. in front of the honorable Judge Havas for multiple court proceedings in Branch 10. Complainant knows that these proceedings were criminal jury trials for Milwaukee County Cases 20CF617, 21CF1421, 20CF4068. MKL was the victim in all these cases that were all set for trial on June 1 2023. While removing the high-risk subject from 504 of the Courthouse, we personally observed the subject yell out obscenities. He was very loud and boisterous as he was being removed from the courtroom for his behavioral issues. He yelled out over Zoom audio to his witness "If you're listening You get up on that stand again and lie I will kill your grandkid."

Complainant states this was just after MKL had testified in a trial where she was the victim of intimidation of a victim and the defendant here was the defendant in that case. The jury had returned a verdict of guilty in that trial literally minutes before the defendant made this statement so it was a clear attempt to threaten and intimidate a witness and extort her into not testifying in the trials in trials that were about to begin in room 504 of the court house.

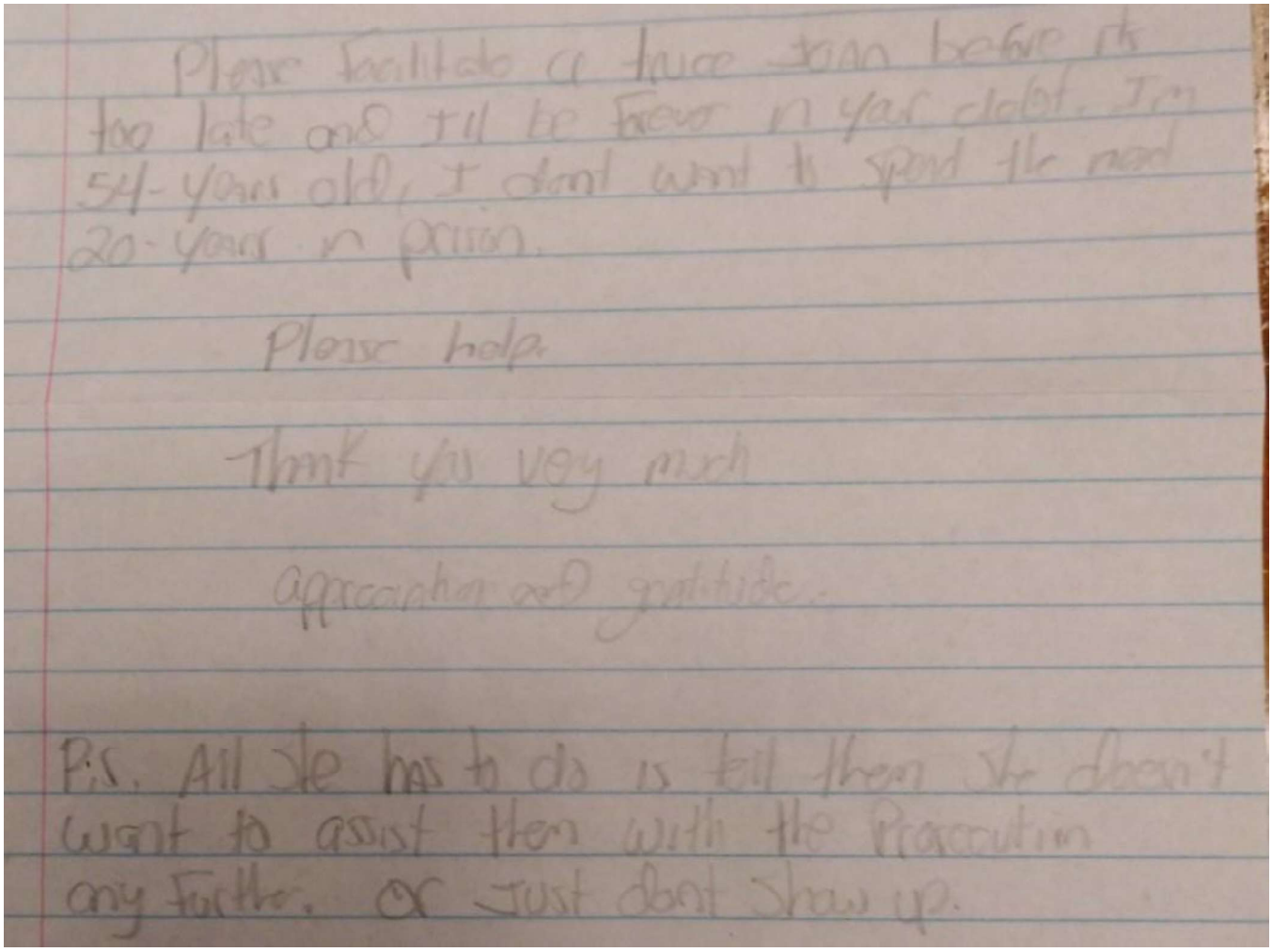
MKL stated she was watching these proceedings on Zoom and heard the defendant make the threat to kill her granddaughter. MKL did not consent to any of the above threats. MKL stated the defendant has made her fear for her safety and the safety of her family.

This complaint is further based upon a statement from MKL that a letter from the defendant was addressed to her coworker at their place of work which is mentioned above and is in the county of Milwaukee. MKL stated this was received on July 6, 2023. MKL stated that she recognized the handwriting in the letter as the defendant's. On page four, Mayer wrote that he was not asking her to take a stance against her friend but to facilitate a truce. **"I will not be coming for her but she absolutely must end this by not testifying. It's the only way I can home home."** It goes on to say that he wants to come home and rebuild his life, "If she gets on the stand, I'm cooked." If she testifies, the District Attorney would play "our recorded phone calls where we were assholes to one another." "Ifshe declines to testify, I will likely be released after about yet another year." **"Talk to her, she will listen to you."** "My trial starts on April 10th." Complainant knows that the defendant did have a previous trial date for his open cases on April 10th.


Her getting on the stand allows the District Attorney to play our recorded phone calls where we were ass holes to one another. If a Jury hears them, its over for me. If she declines to testify I will likely be released after about yet another year

Talk to her, she will listen to you, get her away from that trouble-maker Tiona and talk to her please. She respects you tremendously. My trial starts on April 10th, I have no more time for any alternatives. Please help me Joan

On page five, it is written "Please facilitate a truce Joan before it's too late and I'll be forever in your debt." The letter ends with **"P.S. All she has to do is tell them she doesn't want to assist them with the prosecution any further. Or just don't show up."** This is yet another attempt to dissuade MKL from giving testimony at a proceeding authorized by law.


Please I will do a favor soon before it's too late and I'll be free in your debt. I'm 54 years old, I don't want to spend the next 20 years in prison.

Please help

Thank you very much

appreciation and gratitude.

P.S. All he has to do is tell them he don't want to assist them with the Prosecution any further. or just don't show up.

This complaint is further based on the fact that the defendant has been previously convicted of a felony offense and has not been out of custody for more than five years since that conviction making him a repeater even before the most recent conviction the day before the threat to kill MKL's granddaughter.

****End of Complaint****

Electronic Filing Notice:
This case was electronically filed with the Milwaukee County Clerk of Circuit Court office. The electronic filing system is designed to allow for fast, reliable exchange of documents in court cases. Parties who register as electronic parties can file, receive and view documents online through the court electronic filing website. A document filed electronically has the same legal effect as a document filed by traditional means. You may also register as an electronic party by following the instructions found at **http://efiling.wicourts.gov/** and may withdraw as an electronic party at any time. There is a $ 20.00 fee to register as an electronic party. If you are not represented by an attorney and would like to register an electronic party, you will need to contact the Clerk of Circuit Court office at 414-278-4120. Unless you register as an electronic party, you will be served with traditional paper documents by other parties and by the court. You must file and serve traditional paper documents.

Criminal Complaint prepared by Nicolas J Heitman.
ADA Assigned Email Address: Nicolas.Heitman@da.wi.gov

Subscribed and sworn to before me on 07/19/23
Electronically Signed By:
Nicolas J Heitman
Assistant District Attorney
State Bar #: 1070560

Electronically Signed By:
Anna Linden
Complainant