

**FILED**  
**07-06-2020**  
**Clerk of Circuit Court**  
**Kenosha County**  
**2020CF000736**  
**Honorable Bruce E.**  
**Schroeder**  
**Branch 3**

**STATE OF WISCONSIN                      CIRCUIT COURT                      KENOSHA COUNTY**

STATE OF Wisconsin

Plaintiff,

**CRIMINAL COMPLAINT**

vs.

DA Case #: 2020KN002047

JACOB S. BLAKE  
 2805 40th Street, # D  
 Kenosha, WI 53140

Agency Case #: KPD 2020-00021283

DOB: 04/30/1991

Mandatory date

Sex/Race: M/B

Eye Color: Black

Hair Color: Black

Height: 5 ft 11 in

Weight: 160 lbs

Alias:

Defendant.

*For Official Use*

The undersigned, being first duly sworn, states that:

**Count 1: CRIMINAL TRESPASS, DOMESTIC ABUSE**

The above-named defendant on or about Sunday, May 3, 2020, in the City of Kenosha, Kenosha County, Wisconsin, did intentionally enter the dwelling of LNB, without the consent of some person lawfully upon the premises, under circumstances tending to create a breach of the peace, contrary to sec. 943.14(2), 939.51(3)(a), 968.075(1)(a) Wis. Stats., a Class A Misdemeanor, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) 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: THIRD DEGREE SEXUAL ASSAULT, DOMESTIC ABUSE**

The above-named defendant on or about Sunday, May 3, 2020, in the City of Kenosha, Kenosha County, Wisconsin, did have sexual intercourse with LNB, without that person's consent, contrary to sec. 940.225(3)(a), 939.50(3)(g), 968.075(1)(a) Wis. Stats., a Class G Felony, and upon conviction 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. 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 3: DISORDERLY CONDUCT, DOMESTIC ABUSE**

The above-named defendant on or about Sunday, May 3, 2020, in the City of Kenosha, Kenosha County, Wisconsin, while in a public or private place, did engage in violent, abusive, indecent,

profane, boisterous, unreasonably loud or otherwise disorderly conduct, under circumstances in which such conduct tended to cause or provoke 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.

## **PROBABLE CAUSE:**

On May 3, 2020 Kenosha Police Officer Raiche, in full uniform and operating marked squad #3343, responded to 2805 40<sup>th</sup> Street Unit D, City and County of Kenosha, state of Wisconsin for a report of an ex-boyfriend who had broken into the residence and stole vehicle keys, a vehicle and a debit card from the victim before fleeing.

Officers Matz and Raiche arrived on scene and spoke with LNB. Officer Raiche reports LNB was crying and visibly shaken, dressed only in a nightgown. LNB invited them in and explained that the previous evening she had left at approximately 8PM to attend a party in Milwaukee. LNB rented a vehicle for the weekend because she didn't think her vehicle would make it because of mechanical issues. LNB asked her sister Tamara to stay the night and watch her three children while she was gone. LNB returned home at about 4:11AM, her sister was sleeping in the living room on the couch with numerous children so LNB brought her son with her into the first bedroom down the hallway on the east wall, they then lay down to go to sleep.

LNB stated at about 6AM she was woken up by the father of her children, Jacob Blake, herein known as the defendant, standing over her saying, "I want my shit." As LNB lay there, on her back, the defendant, suddenly and without warning, reached his hand between her legs, penetrated her vaginally with a finger, pull it out and sniffed it, and said, "Smells like you've been with other men."

Officer Raiche reported LNB had a very difficult time telling him this and cried as she told how the defendant assaulted her and then the defendant immediately left the bedroom.

LNB stated the defendant penetrating her digitally caused her pain and humiliation and was done without her consent.

LNB stated she was upset but collected herself and ran after the defendant out the front door and then realized her vehicle was missing. LNB ran back inside to her purse, which was on the kitchen counter and checked it, quickly realizing her key to her truck (Ford Explorer 2002), a black individual key and the only key for the vehicle and her Great Lakes Debit Card were missing. LNB immediately called 911 and while waiting for Officers, checked her Great Lakes Account and saw two fraudulent ATM withdrawals on May 3, 2020 that she did not make, both at PNC Bank, 3920 Washington Road, both for \$500, at an unknown time.

LNB stated she and the defendant have three children together but have never resided together in the eight years they have been on and off. LNB stated the defendant is unemployed, has no vehicle, and would not tell LNB where he was currently living. LNB stated over the past eight years the defendant has physically assaulted her around twice a year when he drinks heavily.

LNB did not know how the defendant entered the apartment and thought maybe through a window.

Officer Matz spoke to LNB's sister Tamara, and she advised after LNB had left, the defendant came to the residence for around ten minutes and interacted with the children. Officer Matz asked how the defendant may have entered and she said one of the children had broken a key off in the dead bolt lock so the only way the door locks is by latching the privacy chain. LNB stated when the defendant comes over he usually yells through a window for someone to let him in and most likely when he showed up he possibly had one of the children remove the chain latch so he could enter.

LNB stated she has let the defendant use her vehicle in the past, but that he always asks first, stating it was inappropriate for him to go into her purse.

NB signed the Waiver of Temporary Restraining Order document pertaining to this case.

LNB declined to be seen by an FNE, sheepishly saying she'd been through enough and was still very humiliated and upset by the sexual assault. Officer Raiche reports LNB was only wearing a nightgown with no undergarments, so there was nothing to collect for evidentiary purposes.

On May 4, 2020 Officer Courtier met with LNB who stated her Ford Explorer was returned. The defendant had told LNB's sister, Tamara, he had parked the vehicle outside of her (Tamara's) residence with the keys. LNB stated she went to Illinois and picked up her vehicle, which was not damaged.

Detective Kunz reports he followed up with PNC Bank ATM and Kwik Trip and searched footage at the store between the hours of 0500-0615 on the morning of the incident and at this time, is believed there was no video evidence based on the information obtained so far.

On May 5, 2020 Detective Kunz spoke with LNB who advised she had located her debit card in her rental after she had cancelled the card and she did not know who made the transactions.

Your complainant is an attorney with the Kenosha County District Attorney's Office, who bases his/her knowledge of this complaint on:

- The official law enforcement agency reports of the Kenosha Police Department prepared by Officers Raiche and Matz and Detective Kunz, which reports were prepared in the normal course of law enforcement duties;
- Statements by citizen informant(s) LNB and her sister, Tamara; who are eyewitnesses to the facts they relate;
- Statements by the defendant, which were made contrary to his penal interests;
- The official records of: The Circuit Court for Kenosha County; The Department of Transportation; The FBI Triple I Teletype; The Wisconsin Circuit Court Automated Program, which records are maintained in the normal course of business duties.

:rlw

Subscribed and sworn to before me on 07/06/20

Electronically Signed By:

Carli A. McNeill

Assistant District Attorney

State Bar #: 1081400

Electronically Signed By:

James Kraus

Complainant