

STATE OF WISCONSIN HOMICIDE UNIT MILWAUKEE COUNTY
CIRCUIT COURT CRIMINAL DIVISION

STATE OF WISCONSIN Plaintiff CRIMINAL COMPLAINT

vs.

COOPER, Donald L.
6060 N. 38th Street
Milwaukee, Wisconsin
(D.O.B.: February 02, 1966)

Complaining Witness:

Det. Christopher Blaszak

DA Case Number: 07XF 7158
Circuit Court Case Number:

LOCK, Michael A.
4343 N. 15th Street
Milwaukee, Wisconsin
(D.O.B.: February 25, 1971)

Defendant(s)

THE ABOVE NAMED COMPLAINING WITNESS BEING DULY SWORN SAYS THAT THE ABOVE NAMED DEFENDANT(S) IN THE COUNTY OF MILWAUKEE, STATE OF WISCONSIN.

COUNT 01: INTENTIONAL HOMICIDE, FIRST DEGREE (AS TO BOTH DEFENDANTS)
On or about August 10, 1999, at 4720 N. 53rd Street, City of Milwaukee, did cause the death of Felipe Armondo Melendez-Rivas, another human being, with intent to kill Felipe Armondo Melendez-Rivas, contrary to Wisconsin Statutes Sections 940.01(1)(a).

AS TO COUNT 01:
Upon conviction of this charge, a Class A Felony, the maximum possible penalty is imprisonment for life

COUNT 02: INTENTIONAL HOMICIDE, FIRST DEGREE (AS TO BOTH DEFENDANTS)
On or about April 7, 2000, at 4900 W. Fiebrantz, City of Milwaukee, did cause the death of Eugene Chaney, another human being, with intent to kill Eugene Chaney, contrary to Wisconsin Statutes Sections 940.01(1)(a).

AS TO COUNT 02:
Upon conviction of this charge, a Class A Felony, the maximum possible penalty is imprisonment for life

The basis for complainant's charge of such offense is upon information and belief upon a reading of the written reports of the City of Milwaukee Police Department which complainant believes reliable because those reports have proved reliable in the past and are used in the ordinary and regular course of business of the City of Milwaukee Police Department.

Complainant alleges that the reports of the Park City Police Department, a police department in the State of Illinois reveal that on the date of August 18, 1999, Juan Terrazas stated that his roommate Felipe Armondo Melendez-Rivas had taken his, Juan Terrazas', vehicle on August 10, 1999 and has not returned the vehicle and that he has not seen Felipe Armondo Melendez-Rivas since August 10, 1999 and that he has made a number of attempts to contact Felipe Armondo Melendez-Rivas.

Complainant further alleges that the further reports of the Park City, Illinois Police Department reveal that the vehicle of Juan Terrazas, which Juan Terrazas indicated was taken by Felipe Armondo Melendez-Rivas on August 10, 1999, was recovered abandoned at Midway airport location of the Holiday Inn in the parking lot. Juan Terrazas indicated on the recovery of his vehicle on September 06, 1999, that he had again still not seen Felipe Armondo Melendez-Rivas since August 10, 1999.

Complainant further alleges that since August 18, 1999, Felipe Armondo Melendez-Rivas has been categorized as a missing person in the State of Illinois. Complainant has checked the records

throughout the United States and has not found any indication that Felipe Armondo Melendez-Rivas has been seen since the date of August 10, 1999.

Complainant further alleges that he has spoken to the brother of Felipe Armondo Melendez-Rivas whose name is Jose Melendez. Jose Melendez stated that he had constant contact with his brother Felipe Armondo Melendez-Rivas up until the date of August 10, 1999. He has not seen or heard from his brother since August 10, 1999 and that the conversation that Jose Melendez had with complainant occurred on Wednesday, August 8, 2007. Complainant has further spoken to Jose Melendez as of the date of this complaint and Jose Melendez still indicates that he nor any member of his family who had constant contact with Felipe Armondo Melendez-Rivas until August 10, 1999, has seen or heard from Felipe Armondo Melendez-Rivas since August 10, 1999.

Complainant further alleges that on the date of August 8, 2005, at 12:30 p.m., Detective Carl Buschmann of the City of Milwaukee Police Department was sent to the address of 4900 W. Fiebrantz Street in the City of Milwaukee, Milwaukee County, Wisconsin. On arriving there he observed a concrete slab in the rear yard of 4900 W. Fiebrantz Street. He observed some broken concrete in the back yard of the residence and that under that broken concrete he observed a blue tarp. Inside the blue tarp appeared to be a human being. This body wrapped in the blue tarp was lifted out from underneath the concrete. Inside the blue tarp were human remains. Underneath the human remains was a cell phone. These human remains that were found under the concrete at 4900 W. Fiebrantz Street was then transferred to the Milwaukee County Medical Examiner's Office where Dr. John Carver, an assistant medical examiner at the Milwaukee County Medical Examiner's Office performed an autopsy on the human remains. That externally Dr. Carver found that the body was wrapped in a blue tarp like material. Inside of the blue tarp like material was a blanket that directly covered the body. The autopsy revealed that further Dr. Carver found that there was a duct tape wrapped around the eyes, ears, jaw and mouth of the body. The arms were bound with rope and plastic lock ties and that the thighs were bound with duct tape, the ankles were bound with duct tape, the head, neck and thorax were tightly wound with or wrapped with plastic film. Dr. Carver found that a large part of the body and the skin was decomposed. It was the opinion of Dr. Carver to a reasonable degree of medical certainty that this body died of homicidal violence and it was Dr. Carver's opinion to a reasonable degree of medical certainty that the body was deceased because of homicidal violence. Further, Dr. Carver found that a possible cause of death was asphyxiation and that this opinion is to a reasonable degree of medical certainty.

Complainant further alleges that Dr. Carver took bone samples of the rib and mandible of this human body and sent it to the University of North Texas Center for Human Identification located in Fort Worth, Texas. Furthermore, complainant, along with Detective William Stawicki went to Libertyville, Illinois and met Jose Melendez who indicated that he was the biological brother of Felipe Armondo Melendez-Rivas. Complainant took buccal swabs with the DNA of Jose Melendez, the biological brother of Felipe Armondo Melendez-Rivas and that complainant and Detective Stawicki mailed them by certified mail to the University of North Texas Center for Human Identification in Fort Worth, Texas.

Complainant further alleges that the DNA samples taken from the bone of the rib and mandible were analyzed for microcondria DNA by Christine Capt, a forensic analyst at the University of North Texas System Center for Human Identification and also Dixie Peters, a forensic analyst at the University of North Texas System Center for Human Identification. That both of these people have been found to be experts in the processes of microcondria DNA and the identification of DNA samples compared to other DNA samples. It was the opinion of Christina Capt and Dixie Peters to a reasonable degree of professional certainty that the microcondria DNA data obtained from the buccal swabs of Jose

Melendez compared to the rib and mandible DNA samples taken from the human body found under the concrete on August 8, 2005, at 4900 W. Fiebrantz in the back yard, indicated that the DNA from the jaw and the rib from that human body belonged to a maternal relative of Jose Melendez and would be consistent with that DNA belonging to a brother of Jose Melendez and that this opinion is to a reasonable degree of professional certainty.

Complainant further alleges that the cell phone found under the human remains that was under the concrete on August 8, 2005 was sent to the Investigative Technology Bureau of the FBI which analyzed the cell phone and that the report of FBI Agent Jason Abramowitz who is in the Cryptocryptographic and Electronic Analysis Division of the FBI found the phone number of the cell phone to be 847-322-6660. Detective Mary Schmitz of the City of Milwaukee Police Department spoke to Juan Terrazas who indicated that the number of the cell phone which he lent to Felipe Armondo Melendez-Rivas on August of 1999, was 847-322-6660 and that the cell phone found under the body was the cell phone that he gave to Felipe Armondo Melendez-Rivas on August 10, 1999.

Further the reports of FBI Agent Jason Abramowitz indicates that he was also able to extract the address book from the cell phone found under the body under the concrete on August 8, 2005, at 4900 W. Fiebrantz in the rear yard. This address book revealed that on the date of August 10, 1999, the user of the phone at 7:54 a.m. and at 9:31 a.m. had called the number of 1-414-807-3602. The reports of Detective David Baker revealed that he found that the phone number of 414-807-3602 listed to a man by the name of Bennie D. Kern. Complainant further alleges that the reports of Police Officer Dean Newport reveal that he spoke to Bennie Kern on the date of Monday, August 27, 2007 and that Bennie Kern indicated to Police Officer Newport that he knew Felipe Armondo Melendez-Rivas and that he was a friend of Felipe Armondo Melendez-Rivas. Further, that in the year 1999 prior to August 10, he introduced Felipe Armondo Melendez-Rivas to a man by the name of Michael Lock because Michael Lock could party and could get girls for Felipe Armondo Melendez-Rivas. That sometime in August of 1999 he received a couple of phone calls from Felipe Armondo Melendez-Rivas. Further Bennie Kern stated that it was possible that the phone calls he received on August 10, 1999, were the last phone calls that he had ever received from Felipe Armondo Melendez-Rivas.

Complainant further alleges that he, along with Detective Tom Casper, conducted an interview of Bennie Kern on September 14th, 2007. Bennie Kern said that he was aware that Mando (Felipe A. MELENDEZ-RIVAS) was involved in drug activity. Bennie Kern also stated that he was aware that Michael LOCK was involved in drug activity. Bennie Kern also stated that he was aware that Mike LOCK was involved in girls and that these girls were in addition to dancing were also involved in prostitution. Bennie Kern stated that he introduced Mando to Mike LOCK. Bennie Kern stated that he was aware that drug transactions between Mike Lock and Mando were taking place. Bennie Kern stated that he was present for some of these dealings.

Complainant further alleges that the reports of Detectives Katherine Hein and Gilbert Hernandez reveal that in the year 2007 they spoke to a man by the name of Carl Davis, an adult citizen witness and that Mr. Davis indicated that he recognized Felipe Armondo Melendez-Rivas and that he knew Felipe Armondo Melendez-Rivas as Armondo. Carl Davis stated that on a date in the year he believes could have been 1999, and it was warm out. He indicated that on that evening he, Michael Lock and a woman who was Michael Locks' girlfriend by the name of Shalonda Mason drove to an area near the interstate on Hwy 94 and met a man by the name of Bennie Kern. That Bennie Kern introduced Michael Lock to Armondo who Carl Davis identified in a picture as Armondo Melendez-Rivas. That Armondo Melendez-Rivas agreed to sell Michael Lock 20 kilograms of cocaine and that the plan was that Michael Lock would split the cocaine giving Bennie Kern 10 kilograms and keeping 10 kilograms

for himself to sell. Prior to Michael Lock meeting Armondo Melendez-Rivas, Michael Lock and Carl Davis had a plan and the plan was to rob and kill Armondo Melendez-Rivas. Carl Davis further stated that on the day prior to meeting Armondo Melendez-Rivas he was asked by Michael Lock to dig a hole in the back yard of 4900 W. Fiebrantz Street. He believed he dug this hole either the day they met Armondo Melendez-Rivas or the next day. Further the hole was also dug by Frisco Richardson who is a relative of Carl Davis and that Carl Davis indicated he witnessed Frisco Richardson digging the hole and that this hole was dug in the rear yard at 4900 W. Fiebrantz Street. Further Carl Davis indicated that they had dug a big hole because Armondo Melendez-Rivas was nearly 7 feet tall.

Complainant further alleges that when Carl Davis and Michael Lock did meet with Bennie Kern it was at the Cracker Barrel restaurant on I-94 and that the purpose was for Michael Lock to meet Felipe Armondo Melendez-Rivas. That Felipe Armondo Melendez-Rivas arrived at the Cracker Barrel restaurant, got out of the car, and carried a long white box with roses on it from the trunk of his car to where they were. When Felipe Armondo Melendez-Rivas arrived Bennie Kern left the scene. Carl Davis stated that after the introduction by Michael Lock, they, Davis and Lock, then drove with Felipe Armondo Melendez-Rivas home and Carl Davis was driven home by Michael Lock. Carl Davis stated the next day or the day after that he went to the house at 4900 W. Fiebrantz Street and that there was no one in the house at that time. He indicated that one of the bedroom doors was open and he observed a piece of plastic in a closet and that there were other pieces of plastic inside the closet and he was not sure what it was but that it had a very bad odor to it. Carl Davis stated that he called Michael Lock and Michael Lock told him to get out of the house and to leave. He did leave and later on Michael Lock called him and told him that he needed Carl Davis' help. Carl Davis indicated when he got to 4900 W. Fiebrantz that he observed a man who he identified as the defendant Donald Cooper and who he knew as Coop. Mr. Cooper was standing in the middle of the living room floor and that Michael Lock was there and that lying on the floor was what appeared to be a body wrapped in plastic. He indicated that he could see that the head was sticking out and that the head appeared to be wrapped in clear plastic and he believed this to be a Mexican male. He indicated that he also saw the clothing of this person and recognized the shirt as the clothing that Felipe Armondo Melendez-Rivas was wearing the night before when they met him at the Cracker Barrel restaurant and drove him to Milwaukee. Michael Lock further stated that he had dropped some drugs off to Bennie Kern and that he and Armondo went out and got high and that the next day they (meaning Michael Lock and Donald Cooper did) it, (meaning the killing). Carl Davis asked Michael Lock how it happened. Michael Lock stated that he got someone bigger to take care of it. Michael Lock then asked Carl Davis to help him drag the body of Felipe Armondo Melendez-Rivas out of the house. They then placed Felipe Armondo Melendez-Rivas on another piece of plastic and that he and Michael Lock dragged it out to the hole that Frisco had dug. He and Michael Lock then placed the body in the hole and covered the hole with dirt in the back yard. He indicated that Michael Lock asked him to come back later to cover that particular area with concrete. He indicated that the next day after burying the body he bought some bags of concrete at Home Depot, mixed it in a wheel barrel and formed the concrete and placed it over the body. He indicated that Michael Lock gave him a 1991 Cadillac for helping him cover the body with concrete.

Complainant alleges that all these events occurred in the City and County of Milwaukee, State of Wisconsin.

Complainant further alleges that on the date of April 8, 2000, a woman by the name of Rosalind R. Chaney Hargrove called the City of Milwaukee Police Department to indicate that her brother Eugene Chaney was missing. The reports of Detectives Kathy Hein and Gilbert Hernandez reveal that they spoke to Rosalind Chaney Hargrove who stated that the last time she saw her brother Eugene Chaney

was on April 7, 2000 at approximately 5:00 p.m. Rosalind Chaney Hargrove stated that her brother Eugene Chaney left their house at 3735 N. 6th Street. She indicated that when he left at 5:00 p.m. he indicated that he was going to take care of some business and was going to see a man by the name of Mike. That her brother Eugene Chaney was still in his work uniform and he indicated that he would be back in 30 minutes. She stated that she has never seen Eugene Chaney since this time and that he did not show up for work ever again or come home ever again.

Complainant further alleges that Detective Kathy Hein spoke to Floragina Chaney who indicated that she is also a sister of Eugene Chaney. She stated that the last time she saw Eugene Chaney was on the date of April 7, 2000 at her residence at 3735 N. 6th Street. She indicated that after work Eugene Chaney had come to her residence. Eugene Chaney indicated that he was going to take care of some business, which Floragina Chaney knew to be a drug transaction. He further indicated that he was going to see Michael Lock. When Eugene Chaney walked out of the residence to see Michael Lock that he was carrying a large laundry bag. She indicated that she knew that that laundry bag had a large amount of money in it. He further indicated that he would be back in 20 to 30 minutes. She indicated that she has never seen her brother Eugene Chaney again and that prior to the date of April 7, 2000, that she would see him almost every day and that he never returned after he indicated he was going to see Michael Lock. She indicated that when her brother Eugene Chaney left the residence that he was wearing his uniform shirt and pants.

Complainant further reports that the reports of Detective Kathy Hein further reveal that she spoke to a man by the name of Altonio George. Altonio George stated that in the year 2000 he was dating Eugene Chaney's sister Rosalind Chaney. He stated that at about 5:00 p.m. on the date of April 7, 2000, he was at 3735 N. 6th Street. He indicated that on that date Eugene Chaney received a telephone call from Michael Lock and that Eugene Chaney agreed to do a drug transaction with Michael Lock. He stated that Eugene Chaney walked out of the house at 3735 N. 6th Street to do the drug transaction with Michael Lock and that he has not seen or heard from Eugene Chaney since that date on April 7, 2000.

Complainant further alleges that Detective Kathy Hein further spoke to a woman by the name of Nanette Brown who indicated that she was the girlfriend of Eugene Chaney and that she does remember the date of April 7, 2000. She indicated that Eugene Chaney told her on April 7, 2000 that he was going to meet Michael Lock. That she has met Michael Lock several times and knew who he was. Eugene Chaney never came back and she has not seen him since April 7, 2000.

Complainant further alleges that the car that the family of Eugene Chaney observed him leave in to meet Michael Lock on April 7, 2000, was a 1997 Cadillac. On the date of May 24, 2000, this Cadillac belonging to Eugene Chaney was observed at a parking lot in an apartment complex at 5166 N. Lovers Lane, which is in near W. Silver Spring Drive in the City of Milwaukee. This car was found by Police Officer's Matthew Cooper and Brian Hawley, along with Sergeant Dwight Lovett. Spoken to was a resident of that parking complex by the name of Alnora Williams who stated that this specific car that being the 1997 Cadillac of Eugene Chaney, had been sitting at that apartment complex for approximately 1.5 months. The vehicle was further identified as belonging to Eugene Chaney.

Complainant further alleges that on the date of August 9, 2005, after the skeletal remains of Felipe Armondo Melendez-Rivas was found under the concrete at 4900 W. Fiebrantz Street in the back yard that the concrete was dug up and another body was found under that concrete in a shallow grave under a second slab of concrete which was next to the slab of concrete that Felipe Armondo Melendez-Rivas was found. That body was pulled out of that grave as it was under the concrete and that the body had

a uniform on and the name Chaney was written on the shirt of the uniform. The dental records of Eugene Chaney were on file with the Wisconsin Bureau of Prisons. Those dental records were ordered and obtained by Dr. Jeffrey Jentzen, the medical examiner for Milwaukee County. On receiving those dental records Dr. Jentzen consulted with a forensic odontologist by the name of Dr. L. Thomas Johnson who is a forensic odontologist for Forensic Dentists. That Dr. Johnson compared the dental records of Eugene Chaney which were on file with the Wisconsin Bureau of Prisons with the teeth of the skeletal remains that was found under the slab of concrete at 4900 W. Fiebrantz Street on August 9, 2005, and it was the opinion of Dr. L. Thomas Johnson concluded to a reasonable degree of medical certainty that the dental records that were on file with the Federal Bureau of Prisons and the teeth in the skeletal remains were from the same person and that this opinion is to a reasonable degree of medical certainty.

Complainant further alleges that Dr. Jeffrey Jentzen conducted an autopsy on the skeletal remains of Eugene Chaney and found that there were no discernable injuries to the skeletal remains during the course of the autopsy and it was the opinion of Dr. Jeffrey Jentzen that the skeletal remains of Eugene Chaney died from homicidal violence and that asphyxiation is a possible cause of death.

Complainant further alleges that the reports of Police Officer Phil Parker revealed that he spoke to a woman by the name of Rosalind Chaney. Rosalind Chaney said that on the date of April 7, 2000, that her brother Eugene Chaney did have a cell phone and that the number was 699-7996. Complainant further alleges that a subpoena for the cell phone records of the phone number of 698-7996 was obtained and that those records indicate that the last call that Eugene Chaney made was to a phone number of 397-7649 at 5:57 p.m. on April 7, 2000. Complainant further alleges that the reports of Detective Cameo Barbian-Gayan revealed that she obtained Michael Lock's cellular telephone number during an interview on April 18th, 2000. During this interview Michael Lock revealed his personal cellular phone number of 397-7649.

Complainant further alleges that the reports of Detective Kathy Hein reveal that she spoke to a man by the name of Carl Davis an adult citizen witness. Carl Davis stated that some time about a year after the killing of Armondo Melendez-Rivas that he spoke to Michael Lock as he was at 4900 W. Fiebrantz Street. That he was with a man by the name of Al and that Michael Lock asked them to dig another hole in the rear of the 4900 W. Fiebrantz Street. Carl Davis said to himself that something is going to happen again. That Al then dug the hole at 4900 W. Fiebrantz Street. Michael Lock had told Carl Davis prior to the digging of this hole that his plan was to rob Eugene Chaney of \$100,000 during a drug deal. Present during this incident were Donald Cooper, Michael Lock and himself and a man by the name of Rodney Lee. When Eugene Chaney arrived Donald Cooper was instructed to stand on some steps in the hallway. When Eugene Chaney came into the residence that Rodney Lee walked up to Eugene Chaney, spun him around and knocked him to the floor. Rodney Lee then threw Eugene Chaney on the floor and tied him up. Carl Davis' job was to go out the back door and look around to see if Eugene Chaney had brought anyone else to the residence. Carl Davis stated that after Rodney Lee knocked Eugene Chaney down Michael Lock told him to take Eugene Chaney's car and get rid of it. He stated that he drove Eugene Chaney's beige Cadillac to an apartment complex near Silver Spring Drive and that he was followed by Rodney Lee in another car. He indicated that when he left the residence that Eugene Chaney was not dead but had just been knocked down and tied up. He stated that he then came back to the residence at 4900 W. Fiebrantz Street and that Eugene Chaney was still alive. At that time Michael Lock gave Rodney Lee \$1,000 and instructed Carl Davis to take Rodney Lee home. Carl Davis stated that he then took Rodney Lee home. As he was leaving Donald Cooper began beating Eugene Chaney as he was tied up and Donald Cooper was demanding more money from Eugene Chaney. Eugene Chaney was saying, "You got my money, let me go" and that

Donald Cooper continued telling Eugene Chaney to shut up. At that point Carl Davis took Rodney Lee home and returned back again to the house at 4720 N. 53rd Street and that Eugene Chaney, at that point, was in the back of a Suburban automobile. They all then drove from 4720 N. 53rd Street to 4900 W. Fiebrantz Avenue with Eugene Chaney in the back of the Suburban. Carl Davis indicated he was driving the Suburban and that he backed the Suburban into the garage and was told by Michael Lock to lower the garage door. He indicated the Donald Cooper and Michael Lock then began again demanding more money from Eugene Chaney and that Donald Cooper continued to beat Eugene Chaney in the back of the Suburban. Carl Davis stated he told Michael Lock and Donald Cooper to stop but they didn't. At that point Donald Cooper took a plastic bag and put it over the head of Eugene Chaney. That Eugene Chaney began making muffling kinds of sounds and that he watched Donald Cooper suffocate Eugene Chaney to death and that Michael Lock stood there watching also. He indicated that after Eugene Chaney died from the suffocation, Donald Cooper took the bag off Eugene Chaney's head and that Donald Cooper then took the plastic bag that he used to suffocate Eugene Chaney and put it in his Donald Cooper's pocket. After Eugene Chaney was dead Donald Cooper picked up Eugene Chaney's body and carried it to the hole and that he put the body of Eugene Chaney in the hole and covered the hole with dirt. Carl Davis was asked by Michael Lock to come back the next day to cover the body with concrete and that Carl Davis indicated that he did do this. He indicated that he was given \$2,000 for his help by Michael Lock and that Rodney Lee was given \$1,000.

Complainant further alleges that he spoke to Rodney Lee, an adult citizen witness who is believed to be a reliable person. Rodney Lee stated that he was involved in the robbery of Eugene Chaney with Michael Lock, Donald Cooper, and Carl Davis in the year 2000. He stated that he was asked to get involved in the robbery by Carl Davis. Rodney Lee stated that Carl Davis told him that Mike (referring to Michael Lock) wanted Rodney Lee to do him a favor. He was told by Carl Davis that his role would be dropping off Eugene Chaney's car after the robbery. He said that he knew that the victim was going to be invited over to a house in the area of 53rd and Hampton. He stated that he hid downstairs in the house and that Michael Lock was going to use the code word Auntie and that when Michael Lock said that word Rodney Lee was supposed to come up and assist in the robbery. Rodney Lee indicated that he did hear the code word and that he came up from the basement and he saw Michael Lock pointing a 9mm pistol at Eugene Chaney. He also saw Donald Cooper was holding a Tech-9 pointing it at Eugene Chaney. Rodney Lee stated that Michael Lock told him to pat Eugene Chaney down. Eugene Chaney was then told to go to his knees. That Eugene Chaney began saying, "Mike, don't do me like this." He said that Eugene Chaney asked if he could keep just one of the kilos and that Eugene Chaney told Michael Lock to take all his money but just let him keep one of the kilos. Rodney Lee stated that Michael Lock then threw him, Rodney Lee, a roll of tape and that he was instructed by Michael Lock to tape Eugene Chaney's mouth and to get his keys. Rodney Lee stated that he put a piece of tape over the mouth of Eugene Chaney and was instructed by Michael Lock to bind Eugene Chaney's hands behind his back. He was then told by Michael Lock to take Eugene Chaney's car with Carl Davis and to get rid of the car. He stated that he got \$1,900 for his roll in the robbery. Rodney Lee stated that he did drop off Eugene Chaney's car and that he came back to the house in the area of 53rd and Hampton to get his share of the money. Rodney Lee stated he stood in the hallway of 53rd and Hampton and he saw Eugene Chaney lying on the floor and that he believed that Eugene Chaney was still alive and that he did not see any blood on Eugene Chaney. Rodney Lee stated that he was

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given some money by Michael Lock and that Carl Davis then took him home and dropped him off.

****End of Complaint****

Subscribed and sworn to before me
and approved for filing on this 1st
day of October, 2007


DEPUTY ASSISTANT DISTRICT ATTORNEY


Complaining Witness

MARK WILLIAMS/MH

-- FELONY COMPLAINT --

TYPIST: MH