

STATE OF WISCONSIN

-vs-

Lovea Moore
5723 S Loomis Boulevard
Chicago, IL 60636
DOB: 10/30/1996
Sex/Race: F/B
Eye Color: Brown
Hair Color: Black
Height: 5 ft 4 in
Weight: 240 lbs

Plaintiff,

DA Case No.: 2017BR000479
Assigned DA/ADA: Bryant M Dorsey
Agency Case No.: 17-200249
17-200244
17-200268
17-000290
17-000381
17-000492

Court Case No.: 2017CF _____
ATN:

CRIMINAL COMPLAINT

Defendant,

Complainant, an Assistant District Attorney, being first duly sworn on oath, deposes and says that:

Count 1: RETAIL THEFT, REPEATER

The above-named defendant on or about Saturday, January 07, 2017, in the City of Green Bay, Brown County, Wisconsin, did intentionally take and carry away merchandise held for resale by Walgreens - East Mason without the consent of the merchant, and with intent to deprive the merchant permanently of possession of the merchandise whose value exceeds \$500 but does not exceed \$5,000, contrary to sec. 943.50(1m)(b)&(4)(bf), 939.62(1)(b) Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of Shoplifting, a Felony, in Winnebago County, Illinois Case 16CF226 on July 22, 2016, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased 4 years if the prior conviction was for a felony.

Count 2: RETAIL THEFT, REPEATER

The above-named defendant on or about Saturday, January 07, 2017, in the City of Green Bay, Brown County, Wisconsin, did intentionally take and carry away merchandise held for resale by Walgreens - Main Avenue De Pere without the consent of the merchant, and with intent to deprive the merchant permanently of possession of the merchandise whose value exceeds \$500 but does not exceed \$5,000, contrary to sec. 943.50(1m)(b)&(4)(bf),

939.62(1)(b) Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of Shoplifting, a Felony, in Winnebago County, Illinois Case 16CF226 on July 22, 2016, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased 4 years if the prior conviction was for a felony.

Count 3: RETAIL THEFT, REPEATER

The above-named defendant on or about Saturday, January 07, 2017, in the City of Green Bay, Brown County, Wisconsin, did intentionally take and carry away merchandise held for resale by Walgreens - West Mason without the consent of the merchant, and with intent to deprive the merchant permanently of possession of the merchandise whose value exceeds \$500 but does not exceed \$5,000, contrary to sec. 943.50(1m)(b)&(4)(bf), 939.62(1)(b) Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of Shoplifting, a Felony, in Winnebago County, Illinois Case 16CF226 on July 22, 2016, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased 4 years if the prior conviction was for a felony.

Count 4: RETAIL THEFT, REPEATER

The above-named defendant on or about Saturday, January 07, 2017, in the City of De Pere, Brown County, Wisconsin, did intentionally take and carry away merchandise held for resale by Walgreens – University Avenue without the consent of the merchant, and with intent to deprive the merchant permanently of possession of the merchandise whose value exceeds \$500 but does not exceed \$5,000, contrary to sec. 943.50(1m)(b)&(4)(bf), 939.62(1)(b) Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of Shoplifting, a Felony, in Winnebago County, Illinois Case 16CF226 on July 22, 2016, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased 4 years if the prior conviction was for a felony.

Count 5: RETAIL THEFT, REPEATER

The above-named defendant on or about Saturday, January 07, 2017, in the City of De Pere, Brown County, Wisconsin, did intentionally take and carry away merchandise held for resale by Walgreens – S Wisconsin Street without the consent of the merchant, and with intent to deprive the merchant permanently of possession of the merchandise whose value exceeds \$500 but does not exceed \$5,000, contrary to sec. 943.50(1m)(b)&(4)(bf), 939.62(1)(b) Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of Shoplifting, a Felony, in Winnebago County, Illinois Case 16CF226 on July 22, 2016, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased 4 years if the prior conviction was for a felony.

Count 6: RETAIL THEFT, REPEATER

The above-named defendant on or about Saturday, January 07, 2017, in the City of De Pere, Brown County, Wisconsin, did intentionally take and carry away merchandise held for resale by CVS Pharmacy without the consent of the merchant, and with intent to deprive the merchant permanently of possession of the merchandise whose value exceeds \$500 but does not exceed \$5,000, contrary to sec. 943.50(1m)(b)&(4)(bf), 939.62(1)(b) Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of Shoplifting, a Felony, in Winnebago County, Illinois Case 16CF226 on July 22, 2016, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased 4 years if the prior conviction was for a felony.

Complainant is an Assistant District Attorney with the Brown County District Attorney's Office and knows of the above offense on information and belief based upon:

PROBABLE CAUSE

The complainant, being duly sworn on oath, swears that he has had the opportunity to review the police reports from Officer O'Brien, Officer Wright, Officer Childs, and Detective Schilt of the Green Bay Police Department and Officer Zahurones, Officer Leiterman, Officer Zietlow, and Detective Sergeant Schrank of the De Pere Police Department, and other documents supporting this complaint, which are the types of reports and documents kept in the ordinary course of business, which complainant believes to be truthful and

reliable because they have proven to be truthful and reliable on numerous occasions in the past.

The complainant further asserts that based upon his review of the reports and/or supporting documents, the incidents alleged occurred in Brown County, Wisconsin.

His review of the police reports from the Green Bay Police Department and De Pere Police Department indicates the following information:

Incident #1

On January 7, 2017, at approximately 8:00 PM, Officer O'Brien of the Green Bay Police Department was dispatched to Walgreens, located at 1401 East Mason Street, Green Bay, Wisconsin, in reference to a retail theft that occurred earlier in the day.

Upon arrival, Officer O'Brien made contact with Walgreens Manager Ashley Wolf. Wolf advised that at approximately 10:30 AM a black female, wearing a purple jumpsuit with white strips, entered the store and is believed to have taken and carried away approximately \$550 in merchandise without paying and without consent. In particular, it is believed the suspect took and carried away 11 packages of Crest Whitening Strips, valued at \$50 per item based on inventory records

Wolf advised the suspect was depicted on surveillance camera entering and exiting the store.

Incident #2

On January 7, 2017, at approximately 6:45 PM, Officer Wright of the Green Bay Police Department was dispatched to Walgreens, located at 2204 University Avenue, Green Bay, Brown County, Wisconsin, in reference to a retail theft that occurred earlier in the day.

Upon arrival, Officer Wright made contact with Walgreens Manager Nicholas Perry. Perry advised that on January 7, 2017 at approximately 10:48 AM, a black female, wearing a purple jumpsuit with white strips, entered the store, selected a gift bag from the Hallmark Card isle, and placed it in her cart. The female proceeded to move around the store and placed several high-valued items inside the bag, including Crest Whitestrips, Rogaine, and Abreva cold sore medication. Many of these items were in anti-theft spider-wrapping devices. Perry advised that the female was observed placing these items into the gift bag located in her cart. When the female approached the exit, she grabbed the gift bag from the cart and exited the store beyond the last point of purchase. Perry advised the suspect was present in store for approximately 5 minutes. Perry advised the female made no attempt to purchase the merchandise and did not have consent to take and carry away the items without paying. Perry advised these observations were depicted on the stores surveillance camera footage.

Perry advised the suspect stole approximately \$1,737 in merchandise.

Officer Wright reviewed the surveillance footage and confirmed Perry's description of events.

Complainant's review of Google Maps indicates that 1401 East Mason Street, Green Bay, Wisconsin (Location of Incident #1) is approximately 2.1 miles away from 2204 University Avenue, Green Bay, Wisconsin (Location of Incident #2)

Incident #3

On January 7, 2017, at approximately 1:15 PM, Officer Zahurones of the De Pere Police Department was dispatched to Walgreens, located at 150 S. Wisconsin Street, De Pere, Brown County, Wisconsin, in reference to a retail theft that occurred earlier in the day.

Upon arrival, Officer Zahurones made contact with Walgreens Manager Bryant Phillips. Phillips advised that at approximately 11:28 AM, a black female, wearing a maroon/purple jumpsuit with white strips, arrived and exited a silver colored 4 door sedan.

The surveillance footage showed the vehicle was missing 3 of the 4 hubcaps on the car. The only hubcap on the car was the front driver side. I did not see a front license plate but the front bumper looked dark or black colored. I was not able to read a rear license plate on the vehicle.

The female later entered the store, selected two large bags from the Hallmark Cart isle, and placed the bags in her cart. The female proceeded to move around the store and place several high priced items inside the two bags. Records indicate the items included razors, hair color products, Crest Whitestrips, and Rogaine. When the female approached the exit, she grabbed the gift bags and exits the store without paying for the items.

Phillips said the theft detection alarm at the front doors sounded and the female then quickly goes to the parked car in the lot, gets in the passenger side front door, and the vehicle quickly leaves the parking lot. Mr. Phillips said he gave no one permission to leave the store without paying for any merchandise and the person made no attempt to pay for anything that was placed in the two stolen gift bags. Phillips advised these observations were depicted on the stores surveillance camera footage

Phillips advised the suspect stole approximately \$1,491.25 in merchandise.

Officer Zahurones reviewed the surveillance camera footage and confirmed Phillips description of events.

Incident #4

On January 9, 2017, at approximately 11:00 AM, Officer Leiterman of the De Pere Police Department was dispatched to Walgreens, located at 901 Main Avenue, De Pere, Brown County, Wisconsin, in reference to a retail theft that occurred on January 7, 2017 at approximately 11:40 AM.

Upon arrival, Officer Leiterman made contact with Walgreens Manager, Toni Heine. Heine advised that their store was notified of a theft ring that was targeting local Walgreens and stealing Crest White Strips. Upon receiving this information, Heine conducted an inventory of Crest items. After conducting the inventory audit, Heine discovered \$766.26 in missing Crest White Stripes. Officer Leiterman advised Heine of a retail theft that occurred at a nearby De Pere Walgreens on 1/7/17 at 11:30 AM. Heine subsequently reviewed surveillance footage from around that time.

Heine advised Officer Leiterman of the following observations made on CCTV. Heine advised that on 1/7/17 at approximately 11:41, a black female arrived at the store in a silver colored vehicle. The vehicle only had one hubcap. The footage later shows the black female, wearing a dark colored athletic jumpsuit, entering the store without any bags. After approximately 5 minutes, the female is observed exiting the store with a large gift bag. The cash register video does not show the female subject making any attempt to pay for the gift bag or any item possibly contained in the gift bag.

The video later depicts the female suspect enter the front passenger side of the silver, one hub capped vehicle.

Complainant's review of Google Maps indicates that 150 South Wisconsin Street, De Pere, Wisconsin (Location of Incident #3) is approximately 1.3 miles away from 901 Main Avenue, De Pere, Wisconsin (Location of Incident #4)

Incident #5

On January 11, 2017, at approximately 1:01 PM, Officer Zietlow of the De Pere Police Department was dispatched to CVS Pharmacy, located at 800 Main Avenue, De Pere, Brown County, Wisconsin, in reference to a retail theft incident at occurred on January 7, 2017 at 11:54 PM.

Upon arrival, Officer Zietlow made contact with CVS Manager, Kendra Charlier. Charlier advised that she reported the retail theft after discovering the shelves where the replaceable razors are located were empty. Upon discovery, Charlier conducted an inventory report audit which indicated the store should not have been out of the Gillette Razors.

Charlier subsequently reviewed the store's surveillance footage. Based on her review, Charlier discovered the theft of razors occurred on January 7, 2017. Charlier also had contact with the cashier working on the January 7th who indicated that someone walked out of the store and caused the audible alarm to trigger. After the alarm went off, the cashier stated the female party never stopped, continued out of the store past the last point of sale, and never attempted to pay for any merchandise. Charlier stated that the Gillette Razors did have anti-theft devices on them and the alarm would have been triggered if the devices hadn't been removed.

Charlier subsequently provided Officer Zietlow with the surveillance footage of the incident. Officer Zietlow reports that he reviewed the footage. The video footage shows a black

female, exiting a silver 4 door sedan and entering the store at 11:54 AM on January 7, 2017. The black female is wearing a purple track suit with white strips. The video footage shows the female suspect in the aisles where the Gillette Razors are located. The footage then shows the female suspect walking down an aisle toward the entrance/exit. The footage depicts the female carrying a blue gift bag, which appears to be full of merchandise. The female party then exits the store at 11:59 AM.

Charlier ran an additional inventory report audit after being advised of certain types of items targeted by the suspect, such as Crest Whitestrips, Rogaine, Abreva, and Gillette Razors. The additional inventory report audit indicates a suspected loss of \$1264.72 in merchandise.

Complainant's review of Google Maps indicates that 901 Main Avenue, De Pere, Wisconsin (Location of Incident #4) is approximately 0.1 miles away from 800 Main Avenue, De Pere, Wisconsin (Location of Incident #5)

Incident #6

On January 8, 2017, at approximately 12:00 PM, Officer Childs of the Green Bay Police Department was dispatched to Walgreens, located at 1165 W. Mason Street, Green Bay, Brown County, Wisconsin, in reference to a retail theft that occurred on January 7, 2017 at approximately 10 AM.

Upon arrival, Officer Childs made contact with Walgreens Manager, Aaron Michael. Michael presented Officer Childs with surveillance footage depicting a black female stealing merchandise from Walgreens. In particular, the video depicts a black female entering the store on January 7, 2017, shortly after 10:00AM. The female walked around the store with a shopping cart and was seen taking items off of the shelf in several locations and putting those items into a blue bag which was situated in the shopping cart. The video showed the female then exiting the store with a full blue bag which appeared to be a blue paper shopping bag open at the top and items could be seen at the top of the bag as the female was leaving.

Following the theft, Michael conducted an inventory report to identify the stolen items. The report identified the stolen items to include, Crest Whitestrips, Rogaine, and Gillette fusion razor blades.

Michael advised the total amount for the stolen items was approximately \$1,482.72.

Green Bay Police Follow Up Investigation

Detective Brian Schilt of the Green Bay Police Department was assigned to investigate the several instances of retail theft detailed above. In the course of his investigation, Detective Schilt reported the following information:

Green Bay experienced several of these retail thefts from various Walgreen stores which totaled a large amount of value. Included in the thefts were the same items including many Crest Whitestrips. Green Bay Police issued a media release of the suspect images and the

thefts of the Crest Whitestrips. In response to the media release, I received calls from Detectives in De Pere, Appleton, Kaukauna, and Neenah, which all experienced similar thefts. I spoke with Detective Jackie Gleise with Appleton PD. She had similar retail thefts, and surveillance video which showed the same suspect as our thefts, including wearing the same Adidas athletic outfit. Detective Gleise sent out an alert through Cook County, Illinois, crime alert system (CCROC), and within minutes received a call from Detective Hansen with Buffalo Grove PD, Illinois. Detective Hansen had worked retail thefts involving 3 subjects that had stolen Crest White Strips from CVS and Walgreen Pharmacies. He reported to Detective Gleise that one of their subjects was a Lovea Moore (10-30-1996), F/B. Detective Hansen said Lovea Moore was the person that we had surveillance video on.

Detective Gleise was able to locate Moore's Facebook page, and on January 7 at around 10:30 p.m., Moore had posted a picture of herself wearing that same Adidas outfit and holding a very large wad of cash. Lovea Moore has a last known address in Chicago, Illinois. Detective Gleise had already done a preservation request on Moore's Facebook account, and is working presently on obtaining a search warrant for her Facebook account. I have returned phone calls to Detectives in De Pere, Kaukauna, and Neenah PD's. I have left a message for Detective Hansen in Buffalo Grove PD. At this time, I am in contact with Detective Gleise, and waiting on the Facebook warrant results. I have added the Facebook images provided to me by Detective Gleise showing our suspect in the Adidas outfit, and holding a large amount of cash. I have also added to attachments a packet of information on Moore provided to Detective Gleise that is Detective Hansen's previous investigation.

In Detective Hansen's investigation, there were others involved. Two other females would pay a male suspect to drive them around to the various pharmacies. In our latest surveillance video, it shows the suspect, Moore, getting out of the driver's passenger side door and going to the store. After leaving the store, she goes into the rear driver's side door. There is definitely someone in the driver's seat of the vehicle, but because of the blackened windows, we are unable to get a description of the person. This fits the M.O. of the persons arrested by Detective Hansen that there is at least a driver involved in the retail thefts.

De Pere Police Follow Up Investigation

Detective Sergeant Tom Schrank of the De Pere Police Department was assigned to investigate the several instances of retail theft detailed above. In the course of his investigation, Detective Sergeant Schrank reported the following information:

I Detective Sergeant Thomas A. Schrank of DPPD was assigned cases, 2017-000290; 2017-000381; 2017-000492, which are retail thefts. In review of these three cases, it was found that they were also related to similar cases in the City of Green Bay, Appleton, Neenah, Kaukauna, and Oshkosh during the time of December 13, 2016 – January 8, 2017.

Product Loss: In all cases, similar products were taken without the owner's consent. In part, those products are Crest White strips, Gillette Razor blade cartridges, Rogaine hair

product and multiple hair color products. The losses from each business in these cases range from approximately \$766.26 to \$1,737.00 per event for a total of approximately \$17,547.94.

Suspect Vehicle: Similar suspect vehicle used is a silver four door, with only one hub cap which is located on the front driver's side. There is only one license plate on the vehicle which is located on the rear; there is no license plate on the front of the vehicle. The front bumper is either dull dark in color or has a cover on it.

SUSPECT 1: is a black female approximately 18 – 29 years of age, who appears to be approximately 5'03" in height and 190 – 250 lbs., who has long dark hair which touches the top of her buttock. She appears to be wearing Adidas sports apparel top and bottom with striping and/or lettering running down the sleeves, and side of top and down side of legs of pants, with an emblem on the chest which appears to be an Adidas emblem. This apparel is typically referred to as a track warmup suit. She is wearing white tennis shoes which are very clean. This female appears to be heavy chested and has a heavier buttock

POSSIBLE IDENTIFICATION OF SUSPECT 1: Appleton Police Detective Jackie Gleise made a possible identification of suspect 1 as being; Lovea *NMI* Moore F/B DOB: 10/30/1996 5'04" 240 lbs. Long black hair to buttocks, brown eyes, last listed address of 5723 S. Loomis Boulevard, Chicago, IL 60636.

This was developed with the help of the Buffalo Grove Police Department of IL. Detective Schrank reviewed the 42 page intelligence / incident report from the Buffalo Grove Police Department.

In this report, it details events and the arrest of Lovea Moore having been involved in an organized theft ring in early 2016 with an arrest of Moore on March 16, 2016. In brief, Moore was entering Walgreens and CVS stores with her carrying a bag approximately 10 inches tall by 15 inches wide to place stolen items from the store in. The products that she was taking in part were Crest Whitestrips, Nicorette Gum, Rogaine, Probiotics and other items of high U.S. dollar value. These items were then sold to black market retailers on the south side of Chicago. She would typically get paid \$500.00 - \$600.00 for each theft. The black market retailer would at times provide her with a "shopping list" of products to steal. Moore had accomplices in the IL retail theft events which were also arrested. In the Illinois cases there was a person always in the car outside the business waiting for Moore to come out with the stolen products. This driver profited by being paid cash for driving Moore and others to do the retail thefts.

In review of this document and the images attached, it appears that the M.O. is similar to the thefts in NE Wisconsin, and Moore in the images and physical description of Moore, she appears to be consistent to the female doing the thefts in the case in NE Wisconsin.

Detective Gleise also had contact with Illinois Probation and Parole and found that Moore was currently on probation for the retail thefts and burglaries in IL.

FACEBOOK LOVEA MOORE: On January 17, 2017 I did a Facebook friend search for Lovea Moore. I was able to gain public access to Moore's Facebook account. While looking at her public profile consisting in part of images, videos, posts, and messaging, I was able to see many of the images / videos of Moore. In viewing these I was certain that Moore was our suspect 1 in the retail thefts in De Pere, WI.

2. Records of the Full Court Enterprise System for Winnebago County, Illinois Circuit Court. Said records indicate that Lovea Moore, DOB: 10/30/1996, was the defendant in Winnebago County, Illinois Case 16CF226. Said records further indicate that on July 22, 2016, there was a disposition in said case with a Judgment of Conviction on a charge of Retail Theft/Disp Merch/>\$300, a Felony, with an offense date of January 27, 2016, contrary to Section 720 ILCS 5.0/16-25-A-1 IL, Illinois Stats. Said conviction(s) remain(s) of record and unreversed making the defendant a repeater.

Complainant believes the records of CCAP to be true and accurate in that they are records kept in the ordinary course of business and it is within the ordinary course of business to keep said records.

Based on the foregoing, the complainant believes this complaint to be true and correct.

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

This ____ day of January, 2017.

Complainant

(Assistant) District Attorney