

FILED
01-21-2022
Clerk of Circuit Court
Brown County, WI
2022CM000076
Honorable Kendall M.
Kelley
Branch 4

STATE OF WISCONSIN CIRCUIT COURT BROWN COUNTY

STATE OF WISCONSIN
 Plaintiff,

vs.

JAYLENE JEROME EDWARDS
 901 Clinton Street #3
 Green Bay, WI 54303
 DOB: 02/04/1995
 Sex/Race: M/B
 Eye Color: Brown
 Hair Color: Black
 Height: 5 ft 9 in
 Weight: 230 lbs

Defendant.

DA Case No.: 2021BR008131
 Assigned ADA: Caleb Saunders
 Agency Case No.: 21-265025
 Court Case No.: 2022CM____
 ATN:

CRIMINAL COMPLAINT

For Official Use

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

Count 1: CARRYING A CONCEALED WEAPON

The above-named defendant, on or about Sunday, November 14, 2021, in the City of Green Bay, Brown County, Wisconsin, not being a peace officer or other person defined in s. 941.23(2), did go armed with a concealed and dangerous weapon, a firearm, contrary to sec. 941.23(2) 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.

Complainant is an Assistant District Attorney with the Brown County District Attorney's Office and knows of the above offense(s) 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 Detective Jason Leick of the Green Bay Police Department, and other documents supporting this complaint referenced herein, 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. Your complainant also bases this complaint upon the statements of Jaylene Edwards, which were against his penal interest. The complainant further asserts that based upon his review of the referenced reports and/or supporting documents, the incidents alleged occurred in Brown County, Wisconsin.

On Sunday, November 14, 2021, Detective Leick reports he was contacted at 3:05 a.m. to assist in a shooting incident that occurred at about 2:19 a.m. on that date at the Marathon gas station, located in the City of Green Bay, Brown County, Wisconsin. As part of the

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investigation, Detective Leick reports officers received information that Jaylene J. Edwards, DOB: 02/04/1995, was responsible for the shooting.

On November 16, 2021, at about 3:45 p.m., Detective Leick reports Edwards arrived at the Green Bay Police Department and spoke with investigators. During the course of this interview, Edwards acknowledged being present for the altercation which preceded the shooting. Edwards stated he ultimately removed his gun, what he stated was a Smith and Wesson .40 caliber firearm, from his right hip, took aim, removed his safety switch, and fired at the victim. Edwards stated he did so because the victim was armed and was pointing her firearm at others. Edwards stated he was scared that the victim was going to shoot and kill or harm the people around. Detective Leick asked Edwards about the Smith and Wesson .40 caliber handgun. Edwards indicated he bought it two weeks ago off the streets of Milwaukee and that he bought it for protection. Edwards stated the gun was on his right hip and was concealed under his coat. Edwards stated he does not have a Concealed Carry Weapon (CCW) permit.

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

Subscribed and sworn to before me on
01/20/22

Electronically Signed By:

Jonathan J Gigot

Assistant District Attorney

State Bar #: 1096599

Electronically Signed By:

Caleb Saunders

Complainant