

STATE OF WISCONSIN

CRIMINAL COMPLAINT

Plaintiff,

-vs-

Jose G Lara
708 W. Pierce St.
Milwaukee, WI 53204
DOB: 05/23/1985
Sex/Race: M/H
Eye Color: Hazel
Hair Color: Brown
Height: ft in
Weight: 160 lbs

DA Case No.: 2016WL000916
Assigned DA/ADA: Daniel A Necci
Agency Case No.: 16-1210/1

Court Case No.: 16CF

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ATN:

Defendant,

AGENT JAY NOVAK of the Wisconsin Department Of Justice
Division of Criminal Investigations, being first duly sworn, on information and belief, states
that:

Count 1: CONSPIRACY TO COMMIT MANUFACTURE/DELIVER COCAINE (>5 - 15G)

The above-named defendant on Wednesday, February 24, 2016, in the Village of East Troy, Walworth County, Wisconsin, conspired to deliver a controlled substance, to-wit: Cocaine, in an amount of more than 5 grams but not more than 15 grams, contrary to sec. 961.41(1)(cm)2, 961.41(1x) Wis. Stats., a Class E Felony, and upon conviction may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than fifteen (15) years, or both.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

Count 2: ATTEMPTING TO FLEE OR ELUDE A TRAFFIC OFFICER

The above-named defendant on Wednesday, February 24, 2016, in the Village of East Troy, Walworth County, Wisconsin, while operating a motor vehicle on a highway, after having received a visual or audible signal from a marked police vehicle and/or traffic officer, did knowingly flee or attempt to elude a traffic officer by either willful disregard of the visual or audible signal so as to endanger the operation of the police vehicle, traffic officer, other vehicles or pedestrians; or by increasing the speed of the vehicle in an attempt to elude or to flee; or by extinguishing the lights of the vehicle in an attempt to elude or flee, contrary to sec. 346.04(3) 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.

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And furthermore, invoking the provisions of Wisconsin Statute 343.31(3)(d)1, upon conviction the department shall revoke the defendant's operating privileges for 6 months.

PROBABLE CAUSE:

1) Your complainant makes this complaint based upon the following, all of which your complainant believes to be reliable. The information in this complaint does not exhaust your complainant's knowledge of this incident.

2) Complainant has reviewed the reports of the Wisconsin Department of Justice Division of Criminal Investigations which provide that on February 24, 2016, Officer Jeff Price of the Village of East Troy Police Department told Special Agent Raymond Taylor that he interviewed a confidential informant regarding conducting a controlled purchase of controlled substances within the Village of East Troy.

3) Taylor reports that Price stated that the CI made contact with a Roberto Juarez-Nieves and arranged to purchase four eight balls (or approximately 14 grams) of cocaine from Juarez-Nieves and that Juarez-Nieves would deliver the same to the Village of East Troy. Taylor reports that Price stated that he listened to the calls between Juarez-Nieves and the CI.

4) Taylor reports that Price stated that, while waiting at a Shell gas station, the CI received communication from Juarez-Nieves that he was at Roma's Restaurant in the Village of East Troy, Walworth County, Wisconsin.

5) Taylor reports that Price stated that he and other officers traveled to Roma's and that, as Price entered the parking lot he saw Officer Knox of the Town of East Troy Police Department with his service weapon drawn and pointed at a dark colored sedan. Taylor reports that Price stated that the dark colored sedan then squealed its tires and drove at a high rate of speed directly at Deputy Juan Ortiz of the Walworth County Sheriff's Office who also had his weapon drawn and was giving verbal commands.

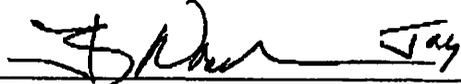
6) Taylor reports that Price stated the vehicle left the parking lot, turned onto County Highway ES and led officers on a chase with speeds exceeding 100 mph. Taylor reports that near Crow Bar Road in Waukesha County, Price heard Ortiz state that something was thrown out the window of the sedan. Price reports that there were multiple police vehicles from multiple agencies chasing the aforementioned sedan and that the vehicles were displaying their lights and sirens.

7) Taylor reports that the chase came to an end in Waukesha County and the driver was determined to be Jose Lara, hereinafter referred to as "the Defendant," and the rear passenger was determined to be Roberto Juarez-Nieves.

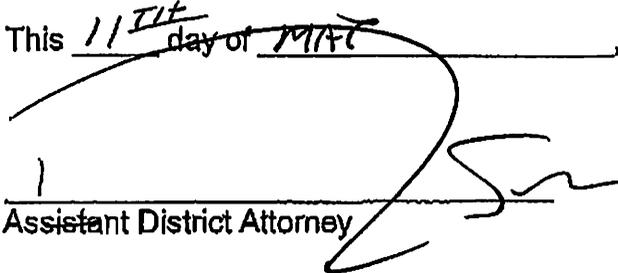
8) Special Agent Jay Novak reports that he spoke with the Defendant who stated that on February 24, 2016, he met with Roberto Juarez-Nieves who told him he needed a half an ounce of cocaine to deliver to "a guy." Novak reports that the defendant stated that he contacted his supplier, acquired a half an ounce of cocaine and delivered the same to Nieves-Juarez. Novak reports that the Defendant stated that he then agreed to drive

Nieves-Juarez to the location where he was to sell the aforementioned cocaine and, when confronted by officers, that he drove away rapidly and fled onto Interstate 43. Novak reports that the Defendant stated that the cocaine was in the car as he fled from officers and that it was he who threw the cocaine out the driver's side window.

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

 Jay Novak
Complainant

This 11TH day of MAY, 2016.


Assistant District Attorney

State Bar No. for Assigned DA/ADA: 1055151