

STATE OF WISCONSIN

CIRCUIT COURT

TAYLOR COUNTY

STATE OF WISCONSIN,  
Plaintiff,

CRIMINAL COMPLAINT

vs.

Case Number: 00 CF \_\_\_\_\_

ROBERT L. PETERSON  
W2798 Hwy 64, Apt. B  
Medford, WI 54451  
DOB: 07-17-1981  
Defendant.

Sex: male

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CRIMINAL COMPLAINT

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Harlan Schwartz, Investigator, Taylor County Sheriff's Department, being first duly sworn on oath, states on information and belief:

**COUNT #1:**

That during the month of January 1999, in the City of Medford, Taylor County, Wisconsin, the defendant did have sexual intercourse with another person, without consent for that person, by use of threat of force or violence, contrary to Wis. Stat. §940.225(2)(a)

PENALTY: Class BC Felony, A fine not to exceed \$10,000, imprisonment for not more than 20 years, or both.

**COUNT #2:**

That on or about March or April 1999, in the Town of Medford, Taylor County, Wisconsin, the defendant did have sexual intercourse with another person, without consent for that person, by use of threat of force or violence, contrary to Wis. Stat. §940.225(2)(a)

PENALTY: Class BC Felony, A fine not to exceed \$10,000, imprisonment for not more than 20 years, or both.

And prays that said defendant be dealt with according to law, that the basis for the complainant's charge of such offense is:

This complaint is based upon the investigation of the Complainant and the Taylor County Sheriff's Department. Complainant serves as an investigator for the Taylor County Sheriff's



Department. His information is based upon his personal knowledge, and the records and files of the Wood County Sheriff's Department and the Taylor County Sheriff's Department. Complainant has relied upon those records and files in the past and have found them to be both true and reliable. Those records and files indicate the following:

As to Count 1: J.K.R., dob: 10-18-1983 told Complainant that she and the defendant were dating from December 1998 until May 1999. J.K.R. stated that about two weeks after they began dating, she and the defendant were at the defendant's house in Medford. J.K.R. stated that she was in the defendant's room in the basement, and the defendant stated that he wanted to have sex. J.K.R. stated that she told the defendant that she did not want to. J.K.R. stated that at this point the defendant pushed her down on the bed. She stated that she had been sitting on the bed and the defendant pushed her down and began kissing her. J.K.R. stated that the defendant unbuttoned her jeans and unzipped them, and that she rebuttoned and zipped her pants. J.K.R. stated that she again told the defendant she did not want to do it. J.K.R. stated that the defendant unbuttoned and unzipped her pants two or three more times, and she continued to rebutton and rezip her pants. J.K.R. stated that the defendant was finally able to force her pants off, and forced her to have intercourse. J.K.R. stated that she repeated that she did not want to do this, but that the defendant just kept doing what he was doing. J.K.R. stated that she was too scared to tell anyone about it.

The defendant told Complainant that in January 1999 he and J.K.R. had sexual intercourse in the bedroom of his home located in Medford, Wisconsin. The defendant stated that he did not remember the details of the first time they had sexual intercourse, but that it was "both our ideas." The defendant stated that he did not force J.K.R. to do anything.

As to Count 2: T.A.G., dob: 01-17-1982 told Investigator Mark Neuman of the Wood County Sheriff's Department that in March or April 1999, she was in a vehicle with J.K.R., dob: 10-18-1983, the defendant and a friend of the defendant named "Darren." T.A.G. stated that J.K.R. asked her whether or not they were going to give the two boys "blow jobs" for giving them a ride in the vehicle. T.A.G. stated that at that point she felt that she was going to perform this sexual act due to the fact that J.K.R. was going to do this with the defendant in the backseat of the vehicle. The defendant's friend "Darren" was the driver and T.A.G. was sitting in the front passenger seat. T.A.G. stated to the best of her knowledge she believed that J.K.R. had oral sex with the defendant during this particular incident, but that she did not look in the backseat to see what type of activities were taking place.

J.K.R. told Complainant that about two to three months after they started dating, she was at the defendant's house with T.A.G. J.K.R. stated that the defendant's friend "Darren" was giving T.A.G. a ride home. J.K.R. stated that T.A.G. was in the front passenger seat, "Darren" was driving, and she and the defendant were in the back seat. J.K.R. stated that the defendant told her he wanted "road head." J.K.R. stated that by "road head" the defendant meant oral sex. J.K.R. stated that the defendant grabbed her each side of her face and forced her head down to perform oral sex on him.



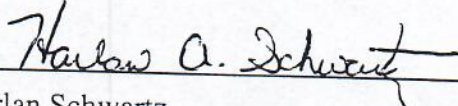
Darin J. Bacon told Investigator Harlan Schwartz that in the spring of 1999, he gave T.A.G., J.K.R., and the defendant a ride to Owen. T.A.G. was in the front passenger seat and J.K.R. and the defendant were in the back seat. Darin Bacon stated that while he was driving on Highway 64 east of Highway DD, T.A.G. looked back at J.K.R. and said something like "now?" Darin Bacon stated that at that time, T.A.G. smiled and leaned over and unzipped his pants. Darin Bacon stated that at that point T.A.G. performed oral sex on him, to his surprise. Darin Bacon stated that he did not know what was going on in the backseat of the vehicle.

The defendant further stated that in March or April, Darin Bacon was driving a vehicle and he was riding in the backseat. The defendant stated that T.A.G. was seated in the front passenger seat and J.K.R. was in the backseat of the vehicle with the defendant. The defendant stated that T.A.G. started to give Darin oral sex as he was driving just east of Highway DD on Highway 64. The defendant stated that J.K.R. told him that he would have to wait until she was done smoking her cigarette, but after she finished smoking her cigarette, she unzipped his pants and gave him oral sex.

Complainant believes the statements of T.A.G., dob: 01-17-1982, J.K.R., dob: 10-18-1983 and Darin Bacon to be both true and reliable since they are based upon the personal knowledge, information and belief of said citizen witness.

Complainant believes the statements of the defendant which incriminate him to be both true and reliable since they are made against his penal interests.

From all of this, Complainant believes this complaint to be both true and correct.

  
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Harlan Schwartz  
Taylor County Sheriff's Department

Subscribed and sworn to before me and  
Approved for filing this 1<sup>st</sup> day of  
March, 2000.

  
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Mara C. Johnston

Mara C. Johnston  
Taylor County District Attorney  
Bar Number 1025553