

Plaintiff,  STATE OF WISCONSIN,  Stinson, Robert Lee 2652 No. 7th St. Milwaukee, WI          Defendant(s)	Page 1 <b>CRIMINAL COMPLAINT</b> CRIME(S) OR VIOLATION(S) 081364 First Degree Murder STATUTE(S) OR ORDINANCE(S) VIOLATED 940.01 COMPLAINING WITNESS J. Jackelen, Thomas CASE NUMBER L-0937
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THE ABOVE NAMED COMPLAINING WITNESS BEING DULY SWORN SAYS THAT THE ABOVE NAMED DEFENDANT(S) IN THE COUNTY OF MILWAUKEE, STATE OF WISCONSIN

on or about November 3, 1984, in the vicinity of 2650 No. 7th Street, City of Milwaukee, did feloniously and with intent to kill Ione F. Cychosz, cause the death of Ione F. Cychosz, another human being, contrary to Wisconsin Statutes section 940.01.

Upon conviction of this charge, a Class A Felony, the penalty is life imprisonment.

Complainant states that he is a City of Milwaukee police detective and makes this complaint based upon the following:

Complainant states that he has read numerous Milwaukee Police Department reports prepared regarding the homicide of Ione F. Cychosz on November 3, 1984. He has relied upon such reports in the past and knows them to have been prepared in the regular course of Police Department activity.

Your complainant has read one report prepared by fellow detective Randy Baier. Detective Baier spoke with an adult citizen named Henry Forester, who related that on November 3, 1984, at about 6:30 A.M., he was walking to work. He stated that he walked through the alley at the above location towards Center Street. He stated that in the vicinity of 2650 No. 7th Street, Milwaukee, Wisconsin, he observed the mostly nude body of an Indian or white female lying face up on a lot. Mr. Forester stated that he immediately notified the police.

Your complainant has read the report prepared by fellow police detective Leroy Shaw. Detective Shaw stated that on the above date at about 7:05 A.M. he was dispatched to investigate a homicide at the above location. He stated that when he arrived at the vicinity he observed other police officers were present. He further observed the body of a white female lying in the rear yard of the residence at 2650/2652 No. 7th St., Milwaukee, Wisconsin. He observed that the head was in a northerly direction face up and that the legs were spread out a 45 degree angle, that the arms were extended straight out from the body. He observed that the victim was clad only with a pair of white socks and a left shoe. He further observed that a blouse and bra were pushed up behind the victim's head. Detective Shaw also observed that the victim had suffered severe injuries to the head and that there was blood on her forehead, eyes, nose, cheeks and mouth. He further observed what appeared to be kick marks and bite marks to the groin area, breasts and sides of the victim. Detective Shaw further reported that officers found a short distance from the body a purse in which was a wallet bearing the identification of Ione F. Cychosz, white female, date of birth 5/7/21. The identification further listed her as living at 2666A No. 7th St.

Your complainant further states that he has reviewed the file of the Milwaukee County Medical Examiner's Office regarding the abovedescribed homicide. These records reflect that the abovedescribed body was

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CRIMINAL DIVISION

MILWAUKEE COUNTY

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positively identified by a step-brother of the victim, a Ralph Krueger, as that of Ione Cychosz of 2666-A No. 7th St. The medical examiner's report further reflects that Medical Examiner Investigator Thomas Hanratty went to the rear of the above location at 7:35 A.M. on November 3, 1984. He observed that police detectives were present and that his examination at the scene indicated that the victim was an elderly white female, about 63 years of age, who was nude except for a cut bra and a blue sweater or shirt pulled over her head and hanging from the left arm. He observed that other clothing was strewn about the area. He further observed that Ione F. Cychosz had been severely beaten and observed swelling and discoloration to her face and head. He further observed apparent bite marks and heel marks to various areas of her body.

The body of Ione F. Cychosz was then conveyed to the County Morgue where it was further examined by John Jones of the Medical Examiner's Office. Jones' external examination revealed that there was blood in the oral cavity and in the left inner ear and the nares of the victim. He further observed that an upper front tooth had been knocked out and that another one was broken. He observed small lacerations to the left side of the upper lower lip. He further observed superficial lacerations to the middle of the back. He further observed abrasions to the left breast round the nipple and face mostly to the left side. He observed teeth marks to the right breast around the nipple, left upper abdomen, and the middle of the upper pubic region. He further observed a partial footprint on the right breast and the right forearm.

Your complainant has learned from Milwaukee County Assistant Medical Examiner Elaine Samuels, MD, a person whom he knows to be experienced in the field forensic pathology, that Ione F. Cychosz died of multiple internal injuries caused by a beating due to homicide.

Your complainant further states that he has reviewed a report prepared by Detective Allan Schoessow which reflects that Schoessow spoke with a Gynette McAdams. Gynette McAdams stated that she knows Ione F. Cychosz and was with her on November 2, 1984, and in the early morning hours of November 3, 1984. Gynette McAdams stated that she, the victim, and other people had traveled by bus to play bingo in Indiana. She stated that they returned by bus to Milwaukee at about mid-night. She stated that the bus stopped them off at 27th and W. Michigan and that she then gave the victim, Ione F. Cychosz, a ride to 7th and Center Streets between 12:00 midnight and 1:00 A.M. on November 3, 1984. She stated that she observed the victim leave her car and walk almost to her home. Gynette McAdams then drove off.

Your complainant states that he has spoken with Dr. L. Thomas Johnson. Your complainant knows that Dr. Johnson holds a Bachelor of Arts degree from the University of Michigan and a D.D.S. from Marquette University in 61. Your complainant is also aware that Dr. Johnson is a practicing dentist. He is also aware that Dr. Johnson is currently a clinical professor of pathology and of fixed prosthodontics at the Marquette University School of Dentistry. Your complainant is also aware that Dr.

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Johnson is a member of the American Board of Forensic Odontology and has been a diplomat of that organization since 1977. Your complainant also knows that Dr. Johnson is a person who has done extensive reading, teaching and published papers in the field of forensic Odontology (bite mark analysis) for over 20 years. He also knows that Dr. Johnson has testified in the Milwaukee County Circuit Courts as well as in other courts in Wisconsin as an expert in the field of Forensic Odontology.

Dr. Johnson informed your complainant that on November 3, 1984 he went to the office of the Milwaukee Medical Examiner where he examined the body of Ione F. Cychoz as described above. At that time Dr. Johnson observed that there were multiple bite marks to the victim's breast as well as bite marks to her abdomen and her upper pubic region. Dr. Johnson indicated that he followed the accepted procedures of the American Academy of Forensic Odontology and preserved the bite mark evidence which was apparent on the victim. This included having numerous photographs taken of the bite marks on Ione F. Cychoz's body from various angles by Dave Cadle, an expert photographer employed by the State Regional Crime Laboratory of Wisconsin. Dr. Johnson further preserved the bite marks by taking tissue samples from the body of Ione F. Cychoz.

Complainant is also aware that a John Doe investigation was commenced in this homicide. Complainant is also aware that on December 3, 1984 that Dr. Johnson examined the mouth of Robert Lee Stinson, the defendant, at that time. Dr. Johnson informed your complainant that he made an extensive oral examination of the defendant's mouth and was assisted by David Cadle in taking photographs of the defendant's mouth. Dr. Johnson further stated that during this examination he made various impressions and models of the defendant's dentition. He stated that in collecting this material he followed the accepted procedures of the American Academy of Forensic Odontology.

Dr. Johnson stated that he has compared the bite mark evidence collected from the body of Ione F. Cychoz with the known dentition of the defendant and it is his opinion, to a reasonable degree of scientific certainty, that the defendant Robert Lee Stinson caused the bite marks on the breasts, abdomen, and upper pubic region of Ione F. Cychoz at or about the time of her death on November 3 1984. Dr. Johnson based this opinion upon his exhaustive examination of the photographs, models, and tissue samples prepared of both the victim and the defendant.

Your complainant states that he has personally spoken with Clara Stinson, the mother of the defendant. She stated that the defendant is her son and that on the date of November 3, 1984 defendant lived with her at 2652 No. 7th St.

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Complainant states the facts recited herein by no means exhaust his knowledge of the facts surrounding the case.

\*\*\*\* END OF COMPLAINT \*\*\*\*

SUBSCRIBED AND SWORN TO BEFORE ME  
AND APPROVED FOR FILING January 21, 1985

*[Signature]*

*[Signature]*  
COMPLAINING WITNESS

I Find Probable Cause to Believe  
This Offense Was Committed by the  
Defendant.

*[Signature]*

Hon. David V. Jennings, Jr.  
Br. 74  
Milwaukee County Circuit Court  
DBLIN/jln

-- FELONY COMPLAINT --

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*[Signature]*