

CRIMINAL COMPLAINT

STATE OF WISCONSIN

DA Case No.:2010ML012463

Plaintiff,

vs.

Complaining Witness:

Cullen, Terry
3443 South 17th Street
Milwaukee, WI 53215
DOB: 09/29/1949

Court Case No.:

Flint, Jane Ellen
2323 South 13th Street
Milwaukee, WI 53215
DOB: 02/21/1960

Court Case No.:

Defendants,

THE ABOVE NAMED COMPLAINING WITNESS BEING DULY SWORN, ON INFORMATION AND BELIEF STATES THAT:

Count 1: SECOND DEGREE SEXUAL ASSAULT (FORCE OR VIOLENCE) (As to defendant Terry Cullen)

The above-named defendant between 2/27/10 and 2/28/10, at 3443 South 17th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did have sexual contact with JR (hand to breast), without that person's consent, by use of force, contrary to sec. 940.225(2)(a), 939.50(3)(c) Wis. Stats.

Upon conviction for this offense, a Class C Felony, the defendant may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

Count 2: THIRD DEGREE SEXUAL ASSAULT (As to defendant Terry Cullen)

The above-named defendant between 2/27/10 and 2/28/10, at 3443 South 17th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did have sexual intercourse with JR (hand to vagina), without that person's consent contrary to sec. 940.225(3), 939.50(3)(c) Wis. Stats.

Upon conviction for this offense, a Class G Felony, the defendant may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than forty (10) years, or both.

Count 3: FALSE IMPRISONMENT (As to defendant Terry Cullen)

The above-named defendant between 2/27/10 and 2/28/10, at 3443 South 17th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did intentionally confine or restrain JR, without that person's consent, and with knowledge that he had no lawful authority to do so, contrary to sec. 940.30, 939.50(3)(h) Wis. Stats.

Upon conviction for this offense, a Class H Felony, the defendants may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

Count 4: IMPROPER ANIMAL SHELTER – VENTILATION / SANITATION - CROCODILIANS (As to defendant Terry Cullen)

The above-named defendant between about 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as the owner of animals, various types of crocodilians, located in basement of the residence, did fail to provide proper shelter for said crocodilians, contrary to sec. 951.14(1), 939.51(3)(a) Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 5: MISTREATMENT OF ANIMALS - CROCODILIANS (As to defendant Terry Cullen)

The above-named defendant between 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did negligently treat animals, various types of crocodilians, located in the basement of the residence, in a cruel manner (unjustifiable injury or death), contrary to sec. 951.02, 939.51(3)(a) Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 6: IMPROPER ANIMAL SHELTER – VENTILATION / SANITATION - CROCODILIANS - PTAC, AS A PARTY TO A CRIME (As to defendant Terry Cullen)

The above-named defendant between about 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as the owner of animals, various types of crocodilians, located in the interior bedroom, den and main room of the residence, did fail to provide proper shelter for said crocodilians, contrary to sec. 951.14(1), 939.51(3)(a), 939.05 Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 7: IMPROPER ANIMAL SHELTER – VENTILATION / SANITATION – TURTLES / TORTOISES - PTAC, AS A PARTY TO A CRIME (As to defendant Terry Cullen)

The above-named defendant between about 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as the owner of animals, various types of turtles / tortoises, located throughout the residence, did fail to provide proper shelter for said turtles / tortoises, contrary to sec. 951.14(1), 939.51(3)(a), 939.05 Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 8: IMPROPER ANIMAL SHELTER – VENTILATION / SANITATION - SNAKES - PTAC, AS A PARTY TO A CRIME (As to defendant Terry Cullen)

The above-named defendant between about 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as the owner of animals, various types of snakes, located throughout the residence, did fail to provide proper shelter for said snakes, contrary to sec. 951.14(1), 939.51(3)(a), 939.05 Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 9: IMPROPER ANIMAL SHELTER – VENTILATION / SANITATION – GIANT AFRICAN POUCH RATS - PTAC, AS A PARTY TO A CRIME (As to defendant Terry Cullen)

The above-named defendant between about 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as the owner of animals, two giant African pouch rats,

MR10-MR11, did fail to provide proper shelter for said giant African pouch rats, contrary to sec. 951.14(1), 939.51(3)(a), 939.05 Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 10: PROVIDING PROPER FOOD AND DRINK TO CONFINED ANIMALS – GIANT AFRICAN POUCH RATS - AS A PARTY TO A CRIME (As to defendant Terry Cullen)

The above-named defendant between about 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, an owner of animals and/or a person responsible for confining animals, two giant African pouch rats, MR10-MR11, Terry Cullen, did negligently fail to supply water and/or food in sufficient quantity for the health of the animals, contrary to sec. 951.13(1) and (2)&18(1), 939.51(3)(a), 939.05 Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 11: IMPROPER ANIMAL SHELTER – VENTILATION / SANITATION - FEEDER MICE & FEEDER RATS (As to defendant Terry Cullen)

The above-named defendant between about 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as the owner of animals, numerous assorted feeder mice and rats, B8-B9, B35-B36, and B41-B42, did fail to provide proper shelter for said feeder mice and rats, contrary to sec. 951.14(1), 939.51(3)(a) Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 12: PROVIDING PROPER FOOD AND DRINK TO CONFINED ANIMALS – FEEDER MICE & FEEDER RATS (As to defendant Terry Cullen)

The above-named defendant between about 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, an owner of animals and/or a person responsible for confining animals, numerous assorted feeder mice and rats, B8-B9, B35-36, and B41-B42, Terry Cullen, did negligently fail to supply water and/or food in sufficient quantity for the health of the animals, contrary to sec. 951.13(1) and (2)&18(1), 939.51(3)(a) Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 13: MISTREATMENT OF ANIMALS - FEEDER MICE / RATS & GIANT AFRICAN POUCH RATS (As to defendant Terry Cullen)

The above-named defendant between 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did negligently treat animals, numerous assorted feeder mice and rats, B8-B9, B35-B36, and B41-B42, and two giant African pouch rats, MR10-MR11, in a cruel manner (unjustifiable injury or death), contrary to sec. 951.02, 939.51(3)(a) Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 14: VIOLATION/ENDANGERED/THREATENED SPECIES – ORNATE BOX TURTLE - PTAC, AS A PARTY TO A CRIME (As to defendant Terry Cullen)

The above-named defendant between 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did intentionally possess an Ornate Box Turtle, female, K3, an endangered and threatened species, contrary to sec. 29.604, 939.05 Wis. Stats.

Upon conviction for this offense, a Misdemeanor, the defendant may be fined not more than Two Thousand Dollars (\$2,000), or imprisoned not more than nine (9) months, or both.

In addition, the court shall order the revocation of all hunting approvals issued to the person under this chapter and shall prohibit the issuance of any new hunting approvals for 3 years.

Count 15: VIOLATION/ENDANGERED/THREATENED SPECIES – BLANDING’S TURTLE - PTAC, AS A PARTY TO A CRIME (As to defendant Terry Cullen)

The above-named defendant between 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did intentionally possess a Blanding’s Turtle, IB26, an endangered and threatened species, contrary to sec. 29.604, 939.05 Wis. Stats.

Upon conviction for this offense, a Misdemeanor, the defendant may be fined not more than Two Thousand Dollars (\$2,000), or imprisoned not more than nine (9) months, or both.

In addition, the court shall order the revocation of all hunting approvals issued to the person under this chapter and shall prohibit the issuance of any new hunting approvals for 3 years.

Count 16: IMPROPER ANIMAL SHELTER – VENTILATION / SANITATION - CROCODILIANS - PTAC, AS A PARTY TO A CRIME (As to defendant Jane Ellen Flint)

The above-named defendant between about 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, being an owner of animals and/or a person responsible for confining animals, various types of crocodilians, located in the interior bedroom, den and main room of the residence, did fail to provide proper shelter for said crocodilians, contrary to sec. 951.14(1), 939.51(3)(a), 939.05 Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 17: IMPROPER ANIMAL SHELTER – VENTILATION / SANITATION – TURTLES / TORTOISES - PTAC, AS A PARTY TO A CRIME (As to defendant Jane Ellen Flint)

The above-named defendant between about 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, being an owner of animals and/or a person responsible for confining animals, various types of turtles / tortoises, located throughout the residence, did fail to provide proper shelter for said turtles / tortoises, contrary to sec. 951.14(1), 939.51(3)(a), 939.05 Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 18: IMPROPER ANIMAL SHELTER – VENTILATION / SANITATION – SNAKES - PTAC, AS A PARTY TO A CRIME (As to defendant Jane Ellen Flint)

The above-named defendant between about 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as the owner of animals, various types of snakes, located throughout the residence, did fail to provide proper shelter for said snakes, contrary to sec. 951.14(1), 939.51(3)(a), 939.05 Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 19: IMPROPER ANIMAL SHELTER – VENTILATION / SANITATION – GIANT AFRICAN POUCH RATS - PTAC, AS A PARTY TO A CRIME (As to defendant Jane Ellen Flint)

The above-named defendant between about 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, as the owner of animals, two giant African pouch rats, did fail to provide proper shelter for said giant African pouch rats, MR10-MR11, contrary to sec. 951.14(1), 939.51(3)(a), 939.05 Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 20: PROVIDING PROPER FOOD AND DRINK TO CONFINED ANIMALS – GIANT AFRICAN POUCH RATS - AS A PARTY TO A CRIME (As to defendant Jane Ellen Flint)

The above-named defendant between about 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, an owner of animals and/or a person responsible for confining animals, two giant African pouch rats, MR10-MR11, Jane Ellen Flint, did negligently fail to supply water and/or food in sufficient quantity for the health of the animals, contrary to sec. 951.13(1) and (2)&18(1), 939.51(3)(a), 939.05 Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 21: VIOLATION/ENDANGERED/THREATENED SPECIES – ORNATE BOX TURTLE - PTAC, AS A PARTY TO A CRIME (As to defendant Jane Ellen Flint)

The above-named defendant between about 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did possess an Ornate Box Turtle, female, K3, an endangered and threatened species, contrary to sec. 29.604, 939.05 Wis. Stats.

Upon conviction for this offense, a Forfeiture, the defendant shall forfeit not less than \$500 nor more than \$2000.00.

In addition, the court shall order the revocation of all hunting approvals issued to the person under this chapter and shall prohibit the issuance of any new hunting approvals for one year.

Count 22: VIOLATION/ENDANGERED/THREATENED SPECIES – BLANDING'S TURTLE - PTAC, AS A PARTY TO A CRIME (As to defendant Jane Ellen Flint)

The above-named defendant between 2/27/10 and 5/12/10, at 2323 South 13th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did possess a Blanding's Turtle, IB26, an endangered and threatened species, contrary to sec. 29.604, 939.05 Wis. Stats.

Upon conviction for this offense, a Forfeiture, the defendant shall forfeit not less than \$500 nor more than \$2000.00.

In addition, the court shall order the revocation of all hunting approvals issued to the person under this chapter and shall prohibit the issuance of any new hunting approvals for one year.

PROBABLE CAUSE:

I am a city of Milwaukee law enforcement officer and I base this complaint on police reports prepared in the ordinary course of business by the city of Milwaukee Police Department, Sensitive Crimes Division. I have relied on similar reports prepared by this same agency and division in the past and have found them to be accurate and reliable. I also base this complaint on the statements of JR, a 24 year old woman, with the date of birth of March 17, 1986.

As to Counts #1-#3 (Defendant Terry Cullen)

Said police reports reflect, and JR states, the following information concerning Counts #1-#3:

Factual Background

Meeting at "Reptile Swap"

JR states that on or about February 7, 2010 she met the above named defendant, Terry Cullen, at a "reptile swap" or "show" at Tinley Park Convention Center in the Village of Tinley Park, Illinois. JR states that she is interested in reptile conservation and attended the "show" because she loves reptiles and was interested in networking with others with similar interests and possibly applying for employment or an internship related to the care and conservation of various species of reptiles.

JR states that the defendant was at the "reptile swap" or "show" representing an organization he formed called the "Cullen Vivarium Wildlife Conservancy." JR spoke at some with the defendant at the "reptile swap" and inquired as to whether his organization offered any internship or employment opportunities and she expressed an interest in working "hands on" with reptiles in a conservancy type setting.

JR states that the defendant was accompanied by at least one other adult male who was affiliated with the defendant and his conservancy. JR also states that she donated \$5 to have a picture taken with one of the defendant's crocodilians, named "Mooshu," who was also in attendance at the "reptile swap." JR produced a photo for law enforcement that depicts JR and the defendant holding the above crocodilian.

JR states that after speaking with the defendant at the "reptile swap" he agreed to meet with her to discuss a possible internship opportunity with his organization based in Milwaukee, Wisconsin. JR agreed to meet the defendant at the Chancery restaurant, located at 4624 S. 27th Street in Milwaukee, on or about February 18, 2010, for an "interview" related to the possible internship opportunity. She states that the defendant told her that the "interview" was intended as an opportunity for him to "get to know her" and determine whether she would work well with his employees.

JR states that when she spoke with the defendant about the internship the defendant gave her the impression that she would be working with him and his employees and that the defendant had some type of conservancy facility that included a building or facility where staff and/or interns would stay that was not the defendant's personal residence. She does state that the defendant was not very specific about exactly how his Milwaukee based operation was structured. She states that he did, however, make it sound as if she would be working with him and others in an organized setting.

Interview for Internship

JR states on the evening of the first "interview" her mother drove her to the location from her home in a smaller community near Chicago, Illinois. She states that when they arrived at the restaurant she joined the defendant while her mother took a seat in a different location in the restaurant and waited for her daughter's "interview" to conclude.

JR states that she and the defendant had dinner at the Chancery and spoke about the internship opportunity, but also about their beliefs and interests concerning reptiles and other topics. JR states that she was very enthusiastic about this possible internship opportunity because it was "like a dream come true" because she very much wanted to have the opportunity to work with crocodilians, snakes and other reptiles "hands on." The defendant indicated that his approach to his work with these animals included such "hands on" work and indicated that some in the "reptile community" are not supportive of him because he endorses this approach. JR, however, shared the defendant's point of view and was interested in learning more about the defendant's work.

JR states that while they did discuss the animals and work the defendant steered the conversation to more personal topics after a short time. She states that the defendant shared a great deal of information about his background, supposed educational accomplishments, childhood difficulties and traumas and numerous other interests. JR states that the defendant told her he was born on a very small island that had very limited access to the outside and that he lived in this secluded island community until he was about six years old when he was adopted by a local couple. He told her that his father was physically and emotionally abusive toward him.

JR states that she felt comfortable with the defendant at this time because of their shared interests and he encouraged her to talk about her background and experiences. She states that she shared with the defendant that she too was abused by her father as a child and other intimate personal information about traumas in her life and her personal and religious beliefs.

JR states that the defendant also told her that he had trained to be a physician but was unable to finish medical school because his abusive father "burned" his [defendant's] "dissertation" and he was unable to complete medical school. [JR states that she was subsequently informed that one does not typically complete a "dissertation" for medical school.] The defendant also told her that he was interested in specializing in "Gynecology" because he loved "babies." JR states that the defendant told her that he elected to become a veterinarian because he did not complete medical school. JR states that the defendant represented to her that he was in fact a trained veterinarian and that he had some medical training.

JR states that the "interview" lasted for 4 to 5 hours. She states that at the conclusion of the interview the defendant asked her to contact him if she was interested in the position. She states that a few days went by and that the defendant contacted her on or about February 23 or 24 2010 and inquired as to why she had not contacted him about the position. She states that she then told the defendant that she was still interested in the internship and agreed to meet him again at the Chancery in Milwaukee on February 27, 2010. The defendant agreed to convey her back to Illinois if her mother would bring her to Milwaukee for the meeting.

First Day of Internship

JR states that her mother drove her to Milwaukee again on February 27, 2010 as planned and dropped her off at the Chancery on S. 27th Street. She states that she met the defendant at about 3:00 P.M. that afternoon and that shortly after arriving the defendant explained to her that he needed to run some errands first. She states that he took her to a post office where he picked up a package that she later learned contained various animal specimens. She states that the defendant then had her sign numerous contracts and that they proceeded to a Kinkos Copy Center where the defendant made copies of these agreements. She states that she was required to sign an agreement wherein she affirmed that she was *not a member of People for the Ethical Treatment of Animals or "PETA" nor was she a spy for "PETA."* She states that she was also required to sign a form of a confidentiality agreement wherein *she was precluded from disclosing the defendant's address to anyone.*

First Visit to 3443 S. 17th Street

JR states that the defendant then took her to a residence located at, what was later determined to be, the above referenced address, 3443 S. 17th Street in the city and county of Milwaukee. She states that she is not familiar with the city of Milwaukee at all and did not know where the defendant was taking her.

JR states that when they arrived they entered through a side door. She states that she was not feeling especially well. She states that at the time she had a small cast on her hand after injuring it ice skating

and that she had a sore throat. She states that she was explaining to the defendant that her throat hurt and he informed her that he had some "medicine" that would alleviate the pain. She states that he then produced a long swab that he claimed had medication on it. She states that the defendant then applied the "medication" to the back of her throat using the swab. She states that when he first applied this "medication" it did help her sore throat. She states that in retrospect she believes that it was not prudent to take an unknown medication from someone she did not know well but she states that the defendant was insistent that it works and did not really ask before inserting the swab into her mouth. JR states that she was not alarmed at the time because the defendant described medical training he received and discussed his interests and knowledge of alternative medicine and natural remedies, which was an interest they shared. She stated that this time she trusted the defendant and that he was very convincing regarding his areas of expertise.

She states that the defendant then offered to give her a tour of the house and "introduce her to the animals" kept in the basement of the residence. She states that in the basement she observed approximately five very large Anaconda snakes in metal tubs. She states that the defendant then showed her how to handle the snakes and encouraged her to do so.

Dinner at Ruby Tuesdays

She states that the defendant then took her to "Ruby Tuesdays" where they had dinner and again spoke at some length. She states that the defendant encouraged her to discuss personal topics again and that she shared additional personal information about herself and conveyed to the defendant she had been sexually abused by her father as a child.

She states that during the dinner the defendant began to make her "uncomfortable" as he made comments about how truly "intimate relationships" "have no boundaries" and he became more demonstrative and touched her shoulder and back. She states that she started to become suspicious of the defendant's motives but was not certain if she was reading the situation accurately as the defendant is significantly older than her (he is 60 and she is 24) and she still believed this was a legitimate opportunity to work with reptiles and become involved in a conservancy. She notes that such opportunities are rare and she did not want to overreact or misinterpret the defendant's behavior and potentially jeopardize this rare internship opportunity.

Visit to 2323 S. 13th Street

JR states that after dinner the defendant took her to a different address, also in Milwaukee, which was later positively identified as 2323 S. 13th Street, where the co-defendant Jane Ellen Flint also resides, and where she, JR, was introduced to the defendant's four "Tibetan wolves." The defendant told her these "wolves" were very vicious but they responded to him. JR states that she again believed the defendant when he told her these animals, who were actually Tibetan Mastiff dogs, were "wolves" the defendant had somehow tamed and trained. JR indicates that the defendant was very convincing when describing his training, accomplishments, and work with animals and that she initially did not question the information he provided, although she was somewhat suspicious about the conditions in which he kept his many reptiles and explained that it was not what she expected.

She states that she informed the defendant that she needed to use the bathroom and that the defendant directed her to a bathroom located near the base of a staircase that led into the basement area. She states that when she entered the bathroom she observed it to be covered in cobwebs and appeared dirty. She also states that it was not well lit. She states that while using the bathroom she was startled and surprised to observe a free roaming crocodilian in the basement area eating cardboard. She states that she became frightened upon discovering this.

She also states that in addition to seeing the crocodilian eating cardboard. She also observed both residence to be extremely cluttered and generally unkempt. She states that she observed security cameras and closed circuit TVs at both locations and numerous animals all over the residence kept in what appeared to be shipping type containers. She states that she was surprised by the number of animals and how they were being kept.

JR states that while at the 13th Street residence she again informed the defendant that she was not feeling well and that her injured hand was causing her pain. She states that the defendant then offered her additional "medicine" for her throat and something he called a "healing pad" to put on her hand. He told her that this "healing pad" was something new out of Germany and that it was "illegal" in the US and very expensive but worked well at alleviating pain. JR states that the defendant put this "helping pad" on her hand and held it there.

She states that the defendant then began to further describe the proper manner in which to handle snakes in anticipation of her assisting with the Anaconda snakes at the other residence. She states that the defendant demonstrated how to properly handle a snake using her arm. She states that shortly thereafter the defendant stated that he was going to take her back to the previous residence, the 3443 S. 17th Street location, where she would get started with her work by cleaning out the containers in which the Anaconda snakes were being housed. She states that the defendant then proceeded to drive her back to the other location.

JR states that at this point she was growing more concerned about the situation, was not feeling well, and wanted to go home. She states that it was now dark outside and that she had no idea where she was as the defendant would not reveal his addresses and she was not familiar with Milwaukee. She states that the defendant had also made a point about telling her that both locations were in very dangerous neighborhoods and that it was not safe to be outside in these neighborhood alone especially at night.

Second Visit to 3443 S. 17th Street – Scene of the Sexual Assaults and False Imprisonment

JR states that once they arrived at back at 3443 S. 13th Street, she believed she would finally be able to attend to the snakes and then make arrangements to go home. She states that at this point she again told the defendant she was not feeling great and that he made "tea" for her. She states that she was seated on a mattress in the "office" area of the residence, where she had been earlier in the day. She states that the it was very cluttered and there was no where else to sit. She states that after the defendant gave her the tea he sat down next to her on the mattress. She states that he then tried to *move closer to her but she attempted to keep distance between the two of them and was increasingly more uncomfortable.*

She states that the defendant then got up, *dimmed the lights and lit some candles.* She states that she *was not comfortable with what the defendant was doing and had absolutely no interest in becoming sexually or romantically involved with him in any fashion.* She states that the defendant then *sat down next to her again and she began to cry.*

She states that her crying appeared to make the defendant angry and she was taken aback by his reaction. She states that the defendant's reaction scared and confused her. She states that at this point she became acutely aware of the fact that she was seemingly stranded with the defendant, who was more than 30 years older than her, more than a foot taller than her and at least 100 pounds heavy than her.

JR states that when the *defendant became angry, very suddenly and unexpectedly, everything seemed to change and she began to fear for her safety.* JR also notes that in addition to believing the neighborhood

was “*dangerous,*” being alone with the defendant in a strange house filled with *many large snakes and other exotic animals, being unfamiliar with the city and not knowing where she was in order to summon help,* she also observed *surveillance/security cameras in numerous places* in the residence and had observed *an open package of 22 caliber bullets* in the office area. Although she states that the defendant *never brandished a weapon* or made an express threat to cause her physical harm, *the surroundings were frightening and the presence of the ammunition, with missing pieces, lead her to believe that the defendant might possibly have a loaded gun secreted somewhere in the residence.*

(It also should be noted that JR’s statements regarding the layout of the residence, condition of the residence, presence of ammunition in the residence, location and type of animals presents in the two residences, as well as the description of the surveillance / security cameras in the residences was corroborated when police executed search warrants on both premises pursuant to investigation of this matter and associated animal relate charges. Additional items found during execution of the search warrants included several fire arms and related ammunition.)

She states that at this point the defendant made some unusual comments concerning the sexual abuse she had experienced and how sexuality is more open and tolerated in his “culture” and then gave her an unsolicited “bear hug.” She states that she was trying hard not to cry and just stood there in an attempt to “not to upset” the defendant. She states that as the defendant was restraining her in this “bear hug,” without her consent, she panicked and began to hyperventilate and experienced difficulty breathing. She states that the defendant released his grip on her and suggested that a massage would help her and that he would call his friend “Jane,” presumably referring to the co-defendant, Jane Ellen Flint, who is a massage therapist.

JR states that before the defendant made the call to “Jane,” the defendant told her to call her Mom and *tell her he would be talking her home in the morning.* She states that she was still upset and having trouble breathing and told the defendant that she wanted her Mom to pick her up as she was not feeling well and wanted to go home. She states that she asked him what the address was but he *would not tell her and insisted that she should just tell her mom she is staying the night.* She states that the defendant appeared to be irritated by her questions. She states that she then placed the call to her Mom but was very vague with her on the phone and states that she was afraid to say anything about what was happening because the defendant appeared to be monitoring her. She also had no way of telling her Mom where she was located.

She states that the defendant then said he was calling “Jane.” She states that she did not believe the defendant actually called anyone because she could not hear any voice on the other end and she tried to listen and was hoping that “Jane” might come over. She states that she does not believe the defendant actually placed the call but she cannot be certain.

Specific Factual Basis: Counts #1 & #3

JR states that after ending the call with “Jane” the defendant again moved uncomfortably close to her and told her he would give her a “massage” and that it would help her. She states that the defendant told her to lay on her stomach and remove her shirt. She states that the defendant told her he needed her to remove her shirt and “sports bra” in order to give her a proper massage. JR states that the defendant then positioned himself on top of her straddling her.

She states that at first she told him she did not want to take her bra off but reluctantly did so because she was afraid of the defendant and did not want him to remove the bra from her body. She also states that he was straddling her so could not break free from him.

She states that once she reluctantly removed her bra she laid on her stomach with her hands firmly clenched over her breasts. She states that the defendant then applied some lotion to her bare back and proceeded to *sit on top of her while in this same straddle position, thereby shifting more of his body weight to her body and making it more difficult for her to move.* She states that the defendant then proceeded to “massage” her. She states that she could *feel the defendant moving his body back and forth against the back of her body that it felt like the defendant was rubbing his body against her buttocks and that she could feel the defendant perspiring and hear him moaning as he did this.* She states that she *asked him to stop and that he was pushing and writhing on her with an amount of force.* She states that she was fighting back tears while the defendant massaged her.

JR states that the defendant then *demand[ed] that she flip over on her back, while he continued to straddle her, thereby exposing her breasts.* She states that she told him “no” that she did not want to, which made the defendant “angry,” which frightened her, so she complied and flipped over on to her back.

She states that she was then positioned on her back while the defendant was on top of her, still straddling her body. She states that she kept her *hands firmly clasped over her breasts as she turned over and continued to do so after she was on her back.* She states that the defendant then insisted *she remove her hands from her breasts but she refused.* She states that *she continued to hold her hands over her breasts and was starting to crying.* She states that *the defendant then forcibly removed her arms and hands from her chest and started touching and fondling her bare breasts, by use of force, without her consent, and while restraining her on the mattress, thereby forcibly holding her to service against her will.*

It should be noted that the defendant, who is substantially larger than JR, was in fact physically restraining and/or confining her at the time he fondled her bare breasts and that this was occurring at a residence, and in a city, with which JR was not familiar. The defendant also ensured that JR would, in effect, be stranded at his residence by refusing to give her the address to the building and telling her the neighborhood was “very dangerous.” JR also states that she observed the defendant to become extremely frightening and intimidating when he became angry and that because of his size she felt powerless to fight back or resist him physically. In this context, under the totality of the circumstances as they existed, she complied with *some* of his demands out of a fear that he might become physically violent. She states that the defendant never expressly or directly threatened to cause her physical harm, but rather used manipulation, tone of voice, body language and actual restraint (when he was straddling her and confining her on the mattress) to compel her compliance.

Counts #2 & #3

JR states that after fondling her bare breasts for some time the defendant began to move his hands down her abdomen and he began to “massage” her lower abdomen without her consent. After rubbing on her abdomen for a brief period of time, while still straddling her as she lay on her back on the mattress, the defendant announced that he (a one time aspiring “Gynecologist”) believed she in fact had an ovarian cyst and that he could “pop it for her.” She states that she told him no and that she would have it looked at later and told him to please not “examine her” or “pop” her cyst. (It should be noted the police recovered a Gynecology manual at another of the defendant’s residences when executing the above referenced search warrants.)

JR states that the defendant reacted in much the same way he did when she refused to take off her shirt and bra and refused to let him see and touch her breasts. She states that the defendant grew increasingly more angry and told her that he had to do it or she would get an infection and that she was lucky he was able to do this since she *did not have any insurance* (she had revealed to him that she did not have health insurance during her “interview” for the internship). She states that he kept pushing the issue (regarding the “cyst”) and became increasingly more angry and frustrated when she said no.

She states that the defendant *then pulled down her pants and underwear, exposing her vagina.* She states that the defendant was still positioned over her and that she remained afraid for all of the reasons noted above. She states that he then proceeded to *insert his fingers into her vagina penetrating her genital opening with his left index finger and middle fingers, without consent, while applying pressure to her abdomen with his right hand.* She states that *this went on for what felt like ten minutes before the*

defendant stopped penetrating her vagina and pronounced that she in fact had an ovarian cyst but he did not "pop" it.

JR states that the defendant then went to the bathroom. She states when the defendant returned his mood and demeanor had changed and he seemed less hostile. She states that he came up to her and started stroking her hair, which made her uncomfortable. She states that he then showed her where she could sleep and proceeded to "tuck her into bed" which she found to be strange.

Additional Information

JR states that the defendant then left and she just sat there awake for a while not sure what to do. She states that she "texted" her boyfriend but did not immediately tell him about what happened because she was still in shock and was not sure how to tell him or what to do and was concerned the defendant might attempt to assault her again but she could not stay awake. She says that she also was very nervous and scared and was conscious of the fact that the defendant appeared to have surveillance cameras.

JR states that the next thing she remembers is the defendant waking her up at about 11:30 the next morning. She states that the defendant then "made her breakfast" and took a shower. She states that while the defendant was in the shower she hurried to get dressed and assemble her belongings. She states that when the defendant was done he came back out and observed that she had gotten dressed. She states that the defendant then started to get angry again and demanded that she take all of her clothes off and take a shower. She states that she told him no and that she would take one later and that she just wanted to get home. However, she states that she was still quite fearful of the defendant especially when he became angry, and reluctantly complied because she was afraid and hoped that she could finally go home if she just did what the defendant said.

She states that the defendant stood next to her in the bathroom and held her with the cast on it out side of the shower for her. She states that she felt uncomfortable with the defendant in the bathroom with her. She states that the defendant then insisted on helping her "drying her hair" which she found strange but she complied hoping she could leave. She also states that the defendant insisted on taking her home himself.

She states that when she finally arrived home her Mom and boyfriend were waiting to greet her. She states that as soon as she saw them she started to break down and cry. She states that they kept asking her what was wrong but that she was uncomfortable talking about it and could not bring herself to tell either if them immediately. She states that after she was able to calm down, she finally told her boyfriend (this was within a couple hours of her returning home). Her boyfriend told her she had to tell her Mom about it and go to the police.

She states that she could not bring herself to tell her Mom so she asked her boyfriend to tell her Mom. She states that they then discussed reporting the incident to the police. JR states that she initially did not want to report it to police because she was still afraid of the defendant and recalled that he had said he had many "friends" on the Milwaukee Police Department and she was concerned that there would not be any "evidence" because she showered and she was ashamed and embarrassed.

JR states that she finally decided to report the matter to her local police department in early May 2010 because she had been receiving some strange harassing calls and letters that she suspected might have something to do with the defendant but she was not sure. Some of the harassing correspondence and calls concerned her cat and had a threatening tone. She thought the defendant might be engaging in the conduct because he had made a point of telling her that he disliked cats and believe that domestic cats were destroying ecosystems and were a general burden on society and the natural world. She states that this came up when they were discussing their respective interests in animals and that the defendant had even referred her to an article on the topic.

She states that she also decided she should tell the police about what happened because she "did not want it to happen to anyone else." She also states that the condition of the many animals in the defendant's homes also concerned her and she kept thinking about the defendant's animals over the past couple for months.

It should be noted that JR expressed her concerns about the defendant's animals to police and gave police detailed information regarding the various species of animals, many of which were endangered or protected species, she encountered in the defendant's homes, including where they were located when she was at his homes and how they were housed, among other important details that were ultimately born out when police executed search warrants on the residences in question.

As to Counts #4-#22 (Defendants Terry Cullen and Jane Ellen Flint)

Said police reports also reflect the following information concerning Counts #4-#22:

Factual Background

As indicated above, police executed search warrants on the above referenced residences in relation to their investigation of the sexual assault allegations and reports that the defendant had numerous exotic and non-native and endangered or protected animals in his residences.

On May 12, 2010 investigators arrived at the scene of 2323 S. 13th Street to execute a search warrant. A residence at which, upon information and belief, both defendant Terry Cullen and defendant Jane Ellen Flint resided and/or conducted business. Police reports reflect that investigations discovered numerous pieces of mail and other animal related documentation in said residence bearing the names of both defendants.

Reports indicate that upon entering the residence investigators were overcome by a strong and putrid odor of urine, feces, and decomposing animals. Investigators immediately observed numerous containers located throughout the residence each of which contained some type of animal. Investigators also observed that the floor in the residence was "rotted" and that one investigator's foot went through the floor when he attempted to survey the scene.

Investigators immediately determined that the scene was a hazard and that additional personnel were necessary to ensure safety at the scene and to recover and move the numerous exotic animals observed in the location. It should be noted that the home was extremely clutter, dirty and appeared uninhabitable (said determination was subsequently reached by the City which declared it a nuisance property and unfit for human or animal habitation)

Investigators note that there appeared to be no system of organization with respect to how the animals were kept or where they were kept as they were found in almost every room in small containers, many of which were stacked on top of each other and appeared to be difficult to access in order to provide food and water.

Investigators then boarded up the residence and arranged to return to the scene the next day with appropriate personnel to execute the search warrant and to recover, identify, catalogue and transport the numerous animals out of the uninhabitable residence.

(Police note that upon execution of search warrant at both of the above locations it was discovered that there were well in excess of 200 animals, most of which were exotic reptiles not native to Wisconsin, and a number of which were protect or endangered species with under federal or state law.)

Upon executing the warrant and proceeding with the identification and removal of the hundreds of animals police investigators and animal experts assisting with the recovery process observed that most of the animals were being kept in inexcusable and deplorable conditions which included a scene in which dead carcasses of animals had not been removed and were intermingled with live animals and that most

animals were kept in contained that appeared to limit movement and contained with rusty water, feces, urine and in some case some animal, in particular a few turtles has mold growing on them, the feeder mice and rats located at the residence had no water and no food and were observed licking a dry water dispenser and had sawdust in there bowls.

There were mice and rats were observed to be "cannibalizing" one another in that there were a number of dead rodents and that the live ones were feeding on the dead rodents. The rodents had no room to move and were a source of putrid stench and there were numerous dead and decomposing rodents in the residence.

Police reports reflect that experts who inventoried and identified the animals and assessed their conditions consistently opined that the type of shelter or care attended to the types of animal found was at minimum "neglectful" and in some cases had lead to healthier problems and in other cases if said conditions persisted would lead to disease of death of the subject animals. Experts concurred that the sheer number of animals found at the above location was highly unusual and would make it virtually impossible to provide proper shelter and care to all of the animals.

Police investigation also observed free roaming crocodilians in the residence eating cardboard and near radiators in the home. Investigators also observed a wading pool filled with dirt that appeared, base on comments of the experts, to be an attempt at breeding crocodilians. It should be noted that police also recovered documentation at said residence, addressed to defendant Terry Cullen, from the Bronx Zoo indicating that animal had been shipped to him and providing instructions that expressly states that it was NOT advisable and inappropriate to breed the animals in the fashion and manner in which the defendant appeared to be attempting to breed them. Investigators late followed up with the Bronx Zoo regarding the animals in question and the Bronx Zoo stated that it was informed that the animals they shipped to defendant Cullen would be cared for at his sanctuary in Florida not in a residence in Milwaukee.

Specific Factual Basis Counts #4-#6, #16 (Species of Crocodilians)

Zoo and museum experts opining on the conditions of the Crocodilians notes that of all the groups of types of reptiles found in the residence they were in the "worst" condition. Experts in the area noted that most of the tanks and other contained in which said animals were recovered, from both in the basement and other areas throughout the home, were dirty, hand significant amount of feces, and in many contained dead and decomposing rats were found. Some of the containers were clearly too small for the animals and did not allow sufficient movement. It was noted that crocodilians need both dry land and water and require and great deal of heat and should be exposed to light. It was noted that most for the crocodilians had no heat lamps and that in some instance space heaters were precariously mounted above the troughs creating an obvious safety hazard. The smell of decomposing flesh, feces and urine was overwhelming and a number of the crocodilians had their snouts pushed against the edge of their container which were not large enough to properly accommodate them and appeared to contribute and could contribute to deformity of the snout. The skeletal remains of a deceased crocodilian were located in the basement in a similar enclosure among the live animals. Said forms of "shelter" were not sufficient to provide adequate care in the long run and amounted to mistreatment.

Specific Factual Basis Counts #7 & #17 (Species of Turtles and Tortoises)

Zoo and museum experts on the conditions to the turtles and tortoises all concurred that the turtles were kept in deplorable conditions that amounted to neglect and maltreatment. Many were in very small enclosures, one tortoise could not move in its enclosure, some had mold growing on them, ensues were dirty, containers were stacked one on top the other. Dead turtles were found among live turtles, creating a health hazard for the animals generally. Said conditions and shelter were not deemed insufficient for proper care of the animals constituting maltreatment by virtue of neglect.

Specific Factual Basis Counts #8 & #18 (Species of Snakes)

Zoo and museum experts concurred that the snakes while in good overall health were kept in condition that constituted neglect. Specially the snake enclosures were too small and not properly ventilation or cleaned. The snakes were also kept in total darkness and many snake enclosures had a significant amount of feces. Such conditions, if maintain, would compromise the health for the animals and created a very poor quality of life for said snakes.

Specific Factual Basis Counts #9-#13, #19-#20 (Species of Rodents)

Zoo and museum experts also concurred that the rodents, feeder mice, feeder rats and giant African pouch rate,. All of which had to be euthanized were treated in a cruel manner resulting in injury, and death of some of the animals. The feeder rats and mice had no room to move, had no food or water and were eating corpses of other mice. The giant African pouch rats were kept in small cages littered with debris and did not have food or water at the time they were located, one of sais animals also had hair loss and sores on his body consistent with maltreatment and neglect.

Specific Factual Basis Counts #14-#15, #21-#22 (Wisconsin Endangered Species)

State DNR wardens also positive identified one Ornate Box Turtle in a glass enclosure in the kitchen area and a Blanding's turtle in a separate enclosure elsewhere in the residence. The animals were positive identified and the species verified. Both species of turtles are endangered species on Wisconsin law and illegal to posses. On information and belief, defendant Terry Cullen, a reptile enthusiastic, intentionally possessed said turtles contrary to Wisconsin law.

****End of Complaint****

Subscribed and sworn to before me and approved for filing this 27th day of May, 2010.

Sara B. Lewis
Assistant District Attorney
1027610

Complaining Witness

Initials of DA/ADA\SBL

-- Felony Complaint --