



heard the sound of a vehicle braking and then a loud “pop.” Officer Madrigal then saw that the van was continuing to travel eastbound, in the westbound lanes of W. Wisconsin Ave., before turning north on N. 22<sup>nd</sup> St. Officer Madrigal then saw a person, subsequently identified as PURCELL A.P., stand up from the street, run about 20 yards, and then collapse in the middle of the street, in the westbound lane of traffic on W. Wisconsin Ave. Officer Madrigal then approached this person. While doing so, a person came running towards where Officer Madrigal was and this person stated “That’s my brother.” This person was subsequently identified as C.A.P. C.A.P. also stated “he was selling the glasses and they robbed him and shot him.” Officer Madrigal found that the person in the street had sustained a gunshot wound to the chest, and the person was pulseless and not breathing. Medical attention was provided to the person, PURCELL A.P., but resuscitation efforts were unsuccessful and PURCELL A.P. was pronounced deceased at the scene.

Milwaukee Police Det. Jeffrey Sullivan conducted an examination of the scene area. During that investigation, Det. Sullivan observed a bullet strike to the building located at 2222 W. Wisconsin Ave. Det. Sullivan also found, just to the west of the front door of the building at 2222 W. Wisconsin Ave., a bullet fragment on the sidewalk. One of the items recovered by Det. Sullivan was an iPhone. The iPhone was recovered near the body of PURCELL A.P.

On February 8, 2021, an autopsy was performed on the body of PURCELL A.P. by Dr. Wieslawa Tlomak, Deputy Medical Examiner at the Milwaukee County Medical Examiner’s Office. During the autopsy, Dr. Tlomak observed that PURCELL A.P. had sustained two gunshot wounds, one to the left side of the chest and the other to the left side of the back. Dr. Tlomak determined that these two wounds were caused by a single bullet. Dr. Tlomak determined that the bullet entered the body of PURCELL A.P. on the left side of his chest, travelled through the lungs, heart, and aorta and then exited the body on the left side of the back. Dr. Tlomak determined that PURCELL A.P. died as a result of this gunshot wound and ruled his death a homicide.

On February 6, 2021, C.A.P. was interviewed by Milwaukee Police Detective Vincent Lopez. During that interview, C.A.P. provided the following information:

1. He and his brother, PURCELL A.P., live at an apartment in the 2300 block of W. Wisconsin Ave.
2. He and his brother have been selling designer glasses for three to four months. They buy the glasses on DHGate and then sell them in Milwaukee. They share their inventory of glasses and they each use their own app, such as OfferUp and Facebook, to sell the glasses.
3. He and his brother had posted Cartier glasses for \$400 about one week ago. Today, February 6, 2021, at about 11:20 a.m., on OfferUp, “Pablo Fernandez” messaged him, C.A.P., with the message “You still got these”, referring to the Cartier glasses. He learned a short time later that his brother had received a message from the same person, so PURCELL A.P. was handling the sale.
4. Shortly after noon, his brother came back into the apartment and said that the guy wants the glasses but they were not tight enough. He saw his brother fix the glasses, and then his brother said that he was selling two pairs for \$500. His brother then left the apartment and two minutes later he, C.A.P. left the apartment.
5. Once outside of the apartment, he saw his brother’s car parked in front of the apartment and

he saw his brother standing near the driver's door of a van that was parked in front of his brother's car. He saw that inside of the van was a driver and a front seat passenger, but he did not see what they looked like.

6. He was walking west on W. Wisconsin Ave. when he heard a gunshot. He looked and no longer saw the van or his brother. He then saw a person lying in the street, in the westbound lane of traffic on W. Wisconsin Ave., and he ran to that person and saw that it was his brother.

As part of the investigation of this homicide, the iPhone, identified as belonging to PURCELL A.P. was searched. During that search, Det. Sullivan saw that on February 6, 2021, there were communications between PURCELL A.P. and "Pablo Fernandez" concerning the sale of eyeglasses.

As part of the investigation of this homicide, Milwaukee Police Detectives Jeffrey Sullivan and Vincent Lopez received records from "OfferUp" regarding the profile name of "Pablo Fernandez." Information received from "OfferUp" was that the account was established on September 27, 2020, and the phone number associated with the account was 262-202-4731. A search of a database maintained by the Milwaukee Police Department showed that the phone number 262-202-4731 was linked to C.M.W., an adult female. During an interview with C.M.W. in 2019, she identified her son as Tyrell D Joseph, d.o.b. 11-19-2003. C.M.W. was interviewed in 2019 because her son Tyrell had been shot in the leg.

The records provided by "OfferUp" containing the following information regarding communications between PURCELL A.P. and "Pablo Fernandez" on February 6, 2021:

Time	Sender	Recipient	Message
17:21	Pablo Fernandez	Purcell	You still got these?
17:22	Purcell	Pablo Fernandez	Yes sir, you trying to make an offer?
17:22	Pablo Fernandez	Purcell	You still got these?
17:23	Purcell	Pablo Fernandez	Yeah i got these left too, 2 for \$500
17:24	Pablo Fernandez	Purcell	You still got these?
17:26	Pablo Fernandez	Purcell	They the same?
17:27	Purcell	Pablo Fernandez	No, these are black sticks with translucent lenses and the other ones are white sticks with blue lenses
17:33	Pablo Fernandez	Purcell	Aw ok ok, I see the difference now but way?
17:35	Purcell	Pablo Fernandez	I-m down on 20 <sup>th</sup> and Wisconsin. You can meet me at the Starbucks on 16 <sup>th</sup> and Wisconsin
17:38	Pablo Fernandez	Purcell	You might as will stay on 20 <sup>th</sup> because I~m coming across 20 <sup>th</sup> m I~m finna pull up
17:39	Purcell	Pablo Fernandez	I~m on 23 <sup>rd</sup> by the scrub a dub. Which ones did you want?
17:41	Pablo Fernandez	Purcell	I just want them 2 but I gotta make sure they good

17:41	Pablo Fernandez	Purcell	Yo screws loose?
17:42	Purcell	Pablo Fernandez	No sir, I'll bring em out and you can see
17:42	Pablo Fernandez	Purcell	Cause if they too stretched out they not gone fit
17:42	Pablo Fernandez	Purcell	Alright
17:45	Pablo Fernandez	Purcell	Wya
17:46	Pablo Fernandez	Purcell	It ain~t no where to park
17:46	Pablo Fernandez	Purcell	I~m finna get gas rq
17:47	Pablo Fernandez	Purcell	You tryna meet me at the gas station?
17:47	Purcell	Pablo Fernandez	Where at?
17:47	Purcell	Pablo Fernandez	Yeah I can
17:48	Pablo Fernandez	Purcell	Alright the one on 27 <sup>th</sup> Lisbon
17:48	Pablo Fernandez	Purcell	Bet give me a couple min, gotta clear my car and shit
17:48	Purcell	Pablo Fernandez	Alright but how long
17:49	Purcell	Pablo Fernandez	6 min
17:54	Pablo Fernandez	Purcell	Ight
17:56	Pablo Fernandez	Purcell	What car you in?
17:57	Purcell	Pablo Fernandez	Vs jetta, blue
17:58	Pablo Fernandez	Purcell	Ight
17:58	Purcell	Pablo Fernandez	2 min
17:58	Pablo Fernandez	Purcell	Ight
18:00	Purcell	Pablo Fernandez	At the pump bro
18:01	Pablo Fernandez	Purcell	Right here

The records obtained from "OfferUp" have the time listed as UTC (Coordinated Universal Time). Central Standard Time is 6 hours behind UTC time. Accordingly, the above-listed communications happened between 11:21 a.m. and 12:01 p.m. on February 6, 2021.

Based upon the information contained in the "OfferUp" records, Milwaukee Police Detectives Rodolfo Alvarado and Martin Saavedra obtained surveillance video from the BP gas station at 2624 W. Lisbon Ave., Milwaukee. This video recorded events on February 6, 2021. Recovered video from outside of the station shows the following events that are relevant to his investigation:

1. At 11:50:22 a.m., the van enters the station's parking lot, travels northbound, and is then out of the field of view of the camera.
2. At 11:51:05 a.m., the van again enters the camera's field of view and stops next to a gas pump.
3. At 11:51:57 a.m., the front passenger door opens and a person gets out of the van and walks to the entrance door of the station. That person then returns to the van, opens the passenger's door, closes the door, returns to the entrance door of the station, and enters the station.
4. At 11:53:33 a.m., that same person walks out of the station and gets back into the van, entering the front passenger's side door.
5. At 11:53:52 a.m., a person gets out of the van, through the driver's door, and puts gasoline into the van. This person then gets back into the van, in the driver's seat.
6. At 12:00:19 p.m., a dark car enters into the field of view of the camera. The driver of this vehicle gets out and approaches the driver's door of the van. It appears that the person is talking to someone in the van.
7. At 12:01:29 p.m., the driver of the car walks back to the car and gets into the car.
8. At 12:03:18 p.m., the person in the driver's seat of the van gets out of the van. This person walks to the passenger's side of the van, opens the door, appears to be talking to person in the van, and then this person enters the gas station.
9. At 12:04:07 p.m., the same person walks out of the gas station and gets back into the van, in the driver's seat.
10. At 12:04:47, the driver of the car gets out of the car, walks up to the van, and, it appears, is talking to the van driver.
11. At 12:05:30 p.m., the driver of the car walks toward the car, walks back to the driver's door of the van, walks back to the car, and gets into the driver's seat of the car.
12. At 12:06:02 p.m., the van travels in reverse, and then drives westbound in the parking lot, and then stops. The driver of the car then reverses the car so that the car is travelling westbound in the parking lot. The car then goes out of the field of view of the camera.
13. At 12:06:42 p.m., the van travels in reverse and exits the station onto W. Lisbon Ave. The van then turns westbound on W. Lisbon Ave. and out of the field of view of the camera.

Recovered video from inside the gas station shows the following events that are relevant to his investigation:

1. At 11:52:20 a.m., the person who got out of the passenger's front door of the van enters the store. This person appears to be wearing a black skull cap, a gray Adidas hooded sweatshirt, and Adidas jogging pants.
2. At 11:53:30 a.m., this person exits the station.
3. At 12:03:40 p.m., the person who got out of the driver's door of the van enters the station. This person is a black male with shoulder-length dreads and is wearing a Nike hooded sweatshirt.

As part of the investigation of this homicide, Milwaukee Police Detective Jeffrey Sullivan received video recordings from the Pole Camera covering the intersection of N. 27<sup>th</sup> St. and W. Wells St. Det. Sullivan reviewed the recorded video and saw that at 12:11:41, PURCELL A.P.'s car is travelling southbound on N. 27<sup>th</sup> St, approaching Wells St. A van is behind PURCELL A.P.'s car. The car and van stop and the traffic light, and once the light is green, the car and the van continue southbound, and out of field of view.

During the investigation of this homicide, video was recovered from a restaurant at 2220 W. Wisconsin Ave. The restaurant has two external cameras that cover Wisconsin Ave. to the west and to the east of the restaurant. The recovered video shows the following:

1. At 12:13:41 a car and a van are travelling eastbound on W. Wisconsin Ave. Both vehicles park on the south side of W. Wisconsin Ave., facing east, west of the intersection of N. 23<sup>rd</sup> St. and W. Wisconsin Ave. The car parks first and the van pulls in front of the car, backs up, and then stops. The car was subsequently determined to be a blue VW Jetta owned by Purcell A.P.
2. A person gets out of the car and walks to the driver's door of the van. That person returns to the car, opens the car door, and then returns to the van, on the driver's side.
3. This person then walks away from the van, walks past the car, and then walks south and out of view of the camera.
4. At 12:19:42, a person is seen walking north into the view of the camera. This person then walks to the van and is standing at the driver's door of the van.
5. At 12:22:49, the van pulls away from where it was parked. The person who had been standing outside of the van, at the driver's side window, is hanging onto the van as it drives. The van then crosses the eastbound lanes of traffic on W. Wisconsin Ave, and drives over a snowbank. The van is then travelling eastbound in the westbound lanes of traffic.
6. At 12:22:57, the van comes to a stop with the person still hanging onto the driver's door of the van. The front passenger in the van can then be seen extending his arm toward the person hanging onto the van. The person hanging onto the van is then seen falling to the ground, and the van then drives away, travelling eastbound in the westbound lanes.
7. The person who was hanging onto the van then gets up, runs a short distance, and falls to the ground. At the same time, a police squad car, which had been travelling eastbound on W. Wisconsin Ave., drives and parks to the east of the person on the ground to prevent westbound traffic from hitting the person on the ground. That person is Purcell A.P.

On February 8, 2021, Milwaukee Police Det. Keith Dodd observed a blue Toyota Sienna minivan parked in the rear of 3822 N. 17<sup>th</sup> St. This van matched the description of the van involved in the above-described homicide of PURCELL A.P. The officers saw that the van had been backed onto the parking slab and was unoccupied.

On February 8, 2021, Det. Lopez and Sullivan were informed that members of Tyrell Joseph's family live at 3823 N. 16<sup>th</sup> St. This residence is across the alley from where the van was parked. On the evening of February 8, Dets. Lopez and Sullivan interviewed Charles Joseph, who resides at 3823 N. 16<sup>th</sup> St. During the interview, Charles Joseph provided the following information:

1. He lives at 3823 N. 16<sup>th</sup> St. with his wife and two of his children.
2. His grandson Tyrell Joseph used to live with them, but Tyrell had recently moved out of the residence and was living, probably, somewhere on the south-side of Milwaukee.
3. Tyrell drives a blue minivan. When Tyrell was living with him, Tyrell would park the van in front or across the alley on the neighbor's slab.

During this interview, Charles Joseph was shown still pictures from the video recovered from the gas station on 27<sup>th</sup> and Lisbon. One of the pictures was of a black male with shoulder length dreads. Upon viewing that picture, Charles Joseph identified it as a picture of his grandson Tyrell. Another picture shown to Charles Joseph was of a male wearing Adidas pants, an Adidas sweatshirt, and a black knit hat. Charles Joseph identified it as a picture of "Eli." Charles Joseph stated that Tyrell is always with "Eli" and that Tyrell's mother and "Eli's" mother are sisters. Charles Joseph was also shown a picture of the van. This picture was recovered from video that depicted the shooting of PURCELL A.P. Upon viewing the picture, Charles Joseph stated that it looked like the van that his grandson drove.

Based upon information in possession of the Milwaukee Police Department, Ismael E. Moreno was developed as possibly being the person Charles Joseph identified as "Eli."

As part of the investigation, Det. Lopez obtained pictures taken of Tyrell D. Joseph, defendant, during the investigation of the 2019 shooting (described above). Det. Lopez compared the pictures of Tyrell Joseph taken in 2019 with still pictures recovered from the gas station on 27<sup>th</sup> and Lisbon Ave. and it appeared to Det. Lopez that Tyrell Joseph was the driver of the van.

Det. Lopez also obtained from the Greendale Police Department a known picture of Ismael E. Moreno, defendant. Det. Lopez showed this picture to Charles Joseph and he identified it as a picture of "Eli." Det. Lopez compared this picture with still pictures recovered from the gas station on 27<sup>th</sup> and Lisbon Ave., and it appeared to Det. Lopez that Ismael Moreno was the front passenger in the van, that being the person Charles Joseph identified as "Eli."

\*\*\*\*End of Complaint\*\*\*\*

**Electronic Filing Notice:**

This case was electronically filed with the Milwaukee County Clerk of Circuit Court office. The electronic filing system is designed to allow for fast, reliable exchange of documents in court cases. Parties who register as electronic parties can file,

receive and view documents online through the court electronic filing website. A document filed electronically has the same legal effect as a document filed by traditional means. You may also register as an electronic party by following the instructions found at <http://efiling.wicourts.gov> and may withdraw as an electronic party at any time. There is a \$ 20.00 fee to register as an electronic party. If you are not represented by an attorney and would like to register an electronic party, you will need to contact the Clerk of Circuit Court office at 414-278-4120. Unless you register as an electronic party, you will be served with traditional paper documents by other parties and by the court. You must file and serve traditional paper documents.

Criminal Complaint prepared by Paul L. Tiffin.  
Subscribed and sworn to before me on 02/22/21  
Electronically Signed By:  
Paul L. Tiffin  
Assistant District Attorney  
State Bar #: 1017260

Electronically Signed By:  
Detective Vincent Lopez  
Complainant