

# HOMICIDE UNIT

STATE OF WISCONSIN      CIRCUIT COURT      MILWAUKEE COUNTY

STATE OF WISCONSIN

Plaintiff,

DA Case No.: 2020ML000165

Court Case No.:

vs.

## CRIMINAL COMPLAINT

SALAZAR GUTIERREZ, MANUEL  
3504 EAST AVENUE SOUTH #40  
LA CROSSE, WI 54601  
DOB: 12/30/1975

Defendant(s).

*For Official Use*

THE BELOW NAMED COMPLAINANT BEING DULY SWORN, ON INFORMATION AND BELIEF STATES THAT:

### Count 1: SECOND DEGREE RECKLESS HOMICIDE

The above-named defendant on or about Tuesday, December 24, 2019, at 2641 South Howell Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, did recklessly cause the death of another human being, JH, contrary to sec. 940.06(1), 939.50(3)(d) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendant may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

### Count 2: HIT AND RUN - RESULTING IN DEATH

The above-named defendant on or about Tuesday, December 24, 2019, at 2641 South Howell Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, did operate a vehicle involved in an accident that resulted in death of JH and failed to reasonably investigate what was struck, and if the operator knew or had reason to know that the accident resulted in injury or death of a person or in damage to a vehicle that is driven or attended by a person, failed to stop the vehicle he was operating as close to the scene of the accident as possible and remain at the scene of the accident until he did the all of the following: give his name, address and the registration number of the vehicle he was operating to the operator or occupant of or person attending any vehicle collided with and, upon request and if available, exhibit his operator's license to the operator or occupant of or person attending any vehicle collided with and render reasonable assistance to any person injured in the accident, including transporting, or making arrangements to transport the person to a physician, surgeon, or hospital for medical or surgical treatment if it is apparent that medical or surgical treatment is necessary or if requested by the injured person, contrary to sec. 346.67(1) and 346.74(5)(d), 939.50(3)(d) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendant may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 343.31(3)(j), the Department shall revoke the defendant's operating privilege for five (5) years.

And the defendant may also be subject to additional collateral consequences upon conviction, including revocation of operating privileges, assessment and treatment requirements, and future restrictions on operation of motor vehicles under Wisconsin Statute 343.31(1m).