STATE OF WISCONSIN CIF	CUIT COURT BROWN GROUP BRANCH VIII	I COUNTY
STATE OF WISCONSIN Plaintiff, vs. DESMOND DAVION JORDAN 249 Westplain Drive Green Bay, WI 54303 DOB: 08/13/1999 Sex/Race: M/I Eye Color: Brown Hair Color: Brown Hair Color: Brown Height: 5 ft 9 in Weight: 150 lbs Alias: Also Known As DEZO	DA Case No.: 2019BR00 Assigned DA/ADA: Amy Pautzke Agency Case No.: DTF18 DTF18-074 Court Case No.: 2019CF ATN: CRIMINAL COMPL	R.G. 8-120 JUL - 1 2019
Defendant		

Complainant, an Assistant District Attorney, being first duly sworn on oath, deposes and says that:

## Count 1: DELIVER THC (TETRAHYDROCANNABINOLS) (<=200 G)

The above-named defendant on or about Thursday, February 22, 2018, in the City of Green Bay, Brown County, Wisconsin, did deliver a controlled substance, to-wit: Tetrahydrocannabinols, in an amount of not more than 200 grams or 4 plants, contrary to sec. 961.41(1)(h)1 Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

### Count 2: SOLICITATION OF DELIVER HEROIN (>10 - 50 G)

The above-named defendant on or about Sunday, June 2, 2019, Brown County, Wisconsin, advised another to deliver a controlled substance, to-wit: Heroin, in an amount of more than 10 grams but not more than 50 grams, contrary to sec. 961.41(1)(d)3, 939.30 Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

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#### **Count 3: FELONY BAIL JUMPING**

The above-named defendant on or about Sunday, June 2, 2019, Brown County, Wisconsin, having been charged with a felony in Brown County Case 2019CF209 and having been released from custody under Chapter 969 Wis. Stats., did intentionally fail to comply with the terms of his bond, contrary to sec. 946.49(1)(b) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

#### Count 4: CONSPIRACY TO COMMIT DELIVER HEROIN (>10 - 50 G)

The above-named defendant Between September 2018 and June 17, 2019, Brown County, Wisconsin, conspired to deliver a controlled substance, to-wit: Heroin, in an amount of more than 10 grams but not more than 50 grams, contrary to sec. 961.41(1)(d)3, 939.31 Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

# Count 5: CONSPIRACY TO COMMIT DELIVER DESIGNER DRUGS (<=3G), SECOND AND SUBSEQUENT OFFENSE

The above-named defendant on or about Friday, June 14, 2019, in the City of Green Bay, Brown County, Wisconsin, conspired to unlawfully and feloniously deliver 3,4methylenedioxymethamphetamine (MDMA) in an amount less than or equal to 3 grams, contrary to sec. 961.41(1)(hm)1, 939.31, 961.48(1)(b) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

And further, invoking the provisions of sec. 961.48(1)(b) Wis. Stats., because the defendant is a subsequent offender, having been convicted of Possession of THC in Brown County Case 2019CF209 on June 3, 2019, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 4 years.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

# Count 6: POSSESSION OF THC (TETRAHYDROCANNABINOLS) - 2ND AND SUBSEQUENT OFFENSE

The above-named defendant on or about Monday, June 17, 2019, in the City of Green Bay, Brown County, Wisconsin, having previously been convicted of a criminal offense relating to controlled substances, Possession of THC in Brown County Case 2019CF209 on June 3, 2019, did knowingly possess a controlled substance, Tetrahydrocannabinols (THC), without a valid prescription, contrary to sec. 961.41(3g)(e) Wis. Stats., a Class I Felony, and upon

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conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

Complainant is an Assistant District Attorney with the Brown County District Attorney's Office and knows of the above offense(s) on information and belief based upon: