

FILED
01-13-2022
Clerk of Circuit Court
Brown County, WI
2022CF000070
Honorable Tammy Jo
Hock
Branch 3

STATE OF WISCONSIN	CIRCUIT COURT BRANCH VI	BROWN COUNTY
STATE OF WISCONSIN Plaintiff,	DA Case No.: 2022BR000389 Assigned DA/ADA: Kari Hoffman Agency Case No.: DTF22-018 Court Case No.: 2022CF ATN:	
vs.		
FELICIA MARIE JACOBSON 1351 Cormier Road Green Bay, WI 54313 DOB: 09/06/1982 Sex/Race: F/I Eye Color: Brown Hair Color: Brown Height: 5 ft 05 in Weight: 170 lbs Alias: Also Known As Felicia Marie Rachal Defendant.	CRIMINAL COMPLAINT	
		For Official Use

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

Count 1: MAINTAINING A DRUG TRAFFICKING PLACE, SECOND OR SUBSEQUENT OFFENSE

The above-named defendant on or about Tuesday, January 11, 2022, in the Village of Ashwaubenon, Brown County, Wisconsin, did knowingly keep/maintain a dwelling which is resorted to by persons using controlled substances in violation of chapter 961 Wis. Stats., contrary to sec. 961.42(1), 961.48(1)(a) 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 further, invoking the provisions of sec. 961.48(1)(a) Wis. Stats., because the defendant is a subsequent offender, having been convicted of Maintain a Drug Trafficking Place in Brown County case 2017CF952, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 6 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 2: BAIL JUMPING

The above-named defendant on or about Tuesday, January 11, 2022, in the Village of Ashwaubenon, Brown County, Wisconsin, having been charged with a felony Maintain a Drug Trafficking Place and having been released from custody under Chapter 969 Wis. Stats., did intentionally fail to comply with the terms of her bond, contrary to sec. 946.49(1)(b) Wis. Stats.,

STATE OF WISCONSIN - VS - Felicia Marie Jacobson

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 3: POSSESS/ILLEGALLY OBTAINED PRESCRIPTION

The above-named defendant on or about Tuesday, January 11, 2022, in the Village of Ashwaubenon, Brown County, Wisconsin, did possess an illegally obtained prescription drug, contrary to sec. 450.11(7)(h), 450.11(9)(a) Wis. Stats., a Misdemeanor, and upon conviction may be fined not more than Five Hundred Dollars (\$500) or imprisoned not more than six (6) months or both.

Count 4: POSSESSION OF DRUG PARAPHERNALIA

The above-named defendant on or about Tuesday, January 11, 2022, in the Village of Ashwaubenon, Brown County, Wisconsin, did knowingly possess with primary intent to use drug paraphernalia to ingest, inject, inhale, pack or store a controlled substance, contrary to sec. 961.573(1) Wis. Stats., a Misdemeanor, and upon conviction may be fined not more than Five Hundred Dollars (\$500), or imprisoned for not more than thirty (30) days, 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 Deputy District Attorney with the Brown County District Attorney's Office and knows of the above offense(s) on information and belief based upon:

PROBABLE CAUSE:

The complainant, being duly sworn on oath, swears that she has had the opportunity to review the police reports from Narcotics Investigator Ronsman of the Brown County Drug Task Force, and other documents supporting this complaint referenced herein, which are the types of reports and documents kept in the ordinary course of business, which complainant believes to be truthful and reliable because they have proven to be truthful and reliable on numerous occasions in the past.

The complainant further asserts that based upon her review of the referenced reports and/or supporting documents, the incidents alleged occurred in the Village of Ashwaubenon, Brown County, Wisconsin.

1. Complainant's review of a report prepared by Narcotics Investigator Ronsman of the Brown County Drug Task Force which indicates:

On Tuesday, January 11, 2022 at 4:38 PM, N/I Prokash and N/I Vandembush, briefed a narcotics search warrant for the residence of 1351 Cormier Rd, in the Village of Ashwaubenon, in Brown County WI. The following narcotics investigators were present during the execution of the search warrant; Lt Katers, Lt Brester, N/I Meisner, N/I Pizzala, N/I Wysocki, N/I Linsmeyer, N/I Mason, N/I Waeghe, N/I Thompson, N/I Zeise, N/I Prokash, N/I Vandembush, N/I Giesler, N/I

STATE OF WISCONSIN - VS - Felicia Marie Jacobson

Meader and I, (N/I Ronsman). During the search of the residence, I acted as the evidence custodian. When an item of evidentiary value was located it was turned over to me. I maintained custody of the items until I was able to process and secure the items into an evidence locker at the Brown County Drug Task Force Office.

Upon execution of the search warrant at 5:10 PM, **Felicia M. Jacobson (9/06/1982)** was taken into custody. Jacobson was the only individual located inside of the residence. While searching JACOBSON's person, I located two yellow capsules with the marking IP102, later identified by DRUGS.com as Gabapentin 300 mg (Exhibit 1), prescription drug. These capsules were located in her right jacket pocket. In the master bedroom located on the northeast corner of the residence, N/I Pizzala located 14 yellow capsules with the marking IP102, later identified by DRUGS.com as Gabapentin 300 mg (Exhibit 2) inside of a jewelry container, on top of a dresser. N/I Giesler located a clear glass pipe with burnt residue inside (Exhibit 4), in a plastic storage tote along the south wall. N/I Giesler also located a clear tube with burnt residue inside, in a jacket pocket which was located in the closet. This item was photographed and destroyed. Based on my training and experience, glass pipes are commonly used by drug users to smoke their drug. Inside of the master bedroom, N/I Pizzala located a Wisconsin Department of Revenue Statement of Account with Jacobson's name. The room also contained female clothing and jewelry. Based on the documents and other items in this room, I determined that Jacobson has control over the bedroom and the property inside. In the kitchen, N/I Meader located a red device which appeared to be used to smoke marijuana. This item was photographed and later destroyed. Lt. Brester located two boxes of Narcan and a box of unused syringes. Based on my training and experience, syringes are commonly used by intravenous drug users. They suck up the controlled substance solution into the syringe and then inject the substance into a vein.

In the basement, N/I Prokash located a clear glass pipe with burnt residue on the inside (Exhibit 3). This pipe was located in the center basement room, underneath a black table. Based on my training and experience, glass pipes are commonly used by drug users to smoke their drug. No other items of evidentiary value were located. Numerous pieces of mail were located inside of the residence with Jacobson's name.

Based on the numerous identifying documents located inside of the residence and Brown County land records, Jacobson is the owner of 1351 Cormier Rd. Jacobson admitted that she uses drugs at this residence. Based upon the paraphernalia inside, the amount of syringes and Narcan, the table with a trace amount of a white powdery substance on it in the master bedroom, the illegal prescription pills, JACOBSON is maintaining a dwelling that is used for the purposes of using controlled substances.

2. Your complainant's review of the Brown County District Attorney's Office case notes and the records of the Wisconsin Circuit Court Access Program (CCAP) website, which records are believed to be truthful and reliable as they are records kept in the ordinary course of departmental business. Said records reflect that in Brown County Case 2020CF1449, on September 9, 2020, Felicia M. Jacobsen, DOB: 9/6/82, the defendant, made an initial appearance in Brown County Court on felony charges of Maintain Drug Trafficking Place – Second and Subsequent Offense. At that time, Court Commissioner Burke imposed a \$5000 signature bond, which included a condition that the defendant commit no new crimes. The case was scheduled for a Status Conference in Brown County Circuit Court Branch 6 on January 31, 2022. Bond remained in full force and effect on January 11, 2022.

STATE OF WISCONSIN - VS - Felicia Marie Jacobson

3. Your complainant has reviewed the records of the Wisconsin Circuit Court Access Program (CCAP) website, which records are believed to be truthful and reliable as they are records kept in the ordinary course of departmental business. Said records indicate that on June 22, 2018, the defendant, Felicia M. Jacobsen (9/06/82), was convicted of Maintain a Drug Trafficking Place in Brown County Case number 2017CF952. Said conviction remains of record and unreversed. Complainant believes the records of CCAP to be true and accurate in that they are records kept in ordinary course of business and it is within the ordinary course of business to keep said records.

Based on the foregoing, the complainant believes this complaint to be true and correct.

Subscribed and sworn to before me on
01/13/22

Electronically Signed By:

Meranda J Hillmann

Assistant District Attorney

State Bar #: 1102495

Electronically Signed By:

Kari Hoffman

Complainant