

**FILED**  
**03-18-2024**  
**Clerk of Circuit Court**  
**Brown County, WI**  
**2024CF000532**  
**Honorable Marc A.**  
**Hammer**  
**Branch 5**

**STATE OF WISCONSIN      CIRCUIT COURT      BROWN COUNTY**

STATE OF WISCONSIN  
Plaintiff,

vs.

CAYDENCE SPENCER CORNELIUS  
N7950 Olson Road  
Oneida, WI 54155  
DOB: 08/18/2004  
Sex/Race: M/I  
Eye Color: Brown  
Hair Color: Brown  
Height: 6 ft 0 in  
Weight: 160 lbs

Defendant.

DA Case No.: 2024BR001672  
Assigned ADA: Jessica R Gereau  
Agency Case No.: 24-008432  
Court Case No.: 2024CF \_\_\_\_  
ATN:

**CRIMINAL COMPLAINT**

*For Official Use*

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

**Count 1: POSSESSION OF A FIREARM BY A FELON, REPEATER**

The above-named defendant, on or about Friday, March 15, 2024, in the City of Green Bay, Brown County, Wisconsin, did possess a firearm, having been convicted of a felony in this state, contrary to sec. 941.29(1m)(a), 939.62(1)(b) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of Felony Bail Jumping in Brown County Case Number 22CF1739, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased 4 years if the prior conviction was for a felony.

**Count 2: POSSESSION OF THC (TETRAHYDROCANNABINOLS) - 2ND AND SUBSEQUENT OFFENSE - PTAC, AS A PARTY TO A CRIME, REPEATER**

The above-named defendant, on or about Friday, March 15, 2024, in the City of Green Bay, Brown County, Wisconsin, as a party to a crime, having previously been convicted of a criminal offense relating to controlled substances, Possession of Narcotic Drugs in Brown County Case Number 23CF212, did knowingly possess a controlled substance, Tetrahydrocannabinols (THC), contrary to sec. 961.41(3g)(e), 939.05, 939.62(1)(b) 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. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of Felony Bail Jumping in Brown County Case Number 22CF1739, which conviction(s) remain of record and unreversed, the maximum term of

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imprisonment for the underlying crime may be increased 4 years if the prior conviction was for a felony.

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 3: FELONY BAIL JUMPING, REPEATER**

The above-named defendant, on or about Friday, March 15, 2024, in the City of Green Bay, Brown County, Wisconsin, having been charged with a felony in Shawano County Case Number 22CF115 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), 939.62(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.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of Felony Bail Jumping in Brown County Case Number 22CF1739, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased 4 years if the prior conviction was for a felony.

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:

### **PROBABLE CAUSE:**

The complainant, being duly sworn on oath, swears that she has had the opportunity to review the police reports from Deputy Jacob Frye of the Brown County Sheriff's Department, 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 City of Green Bay, Brown County, Wisconsin.

1. Your complainant's review of the reports of Deputy Jacob Frye of the Brown County Sheriff's Office, which indicate in relevant part:

On Friday March 15, 2024, I, Deputy Jacob Frye, was working as a uniformed patrol deputy for the Brown County Sheriff's Office. I was operating a fully marked patrol vehicle with an external light package. While on patrol at approximately 7:05 pm, I drove through the park and ride parking lot located off of CTH RK in the Village of Howard (Brown County, WI). In the past there have been suspicious vehicle calls and drug calls at this location. I decided to drive through the lot as a method of crime prevention. While driving through the park and ride, I observed a gray sedan bearing Wisconsin Registration of AGG-3922 parked in a parking stall.

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It appeared that the vehicle was occupied by two people. The driver appeared to be a younger female. There was a white Chevy Tahoe or Suburban parked in front of that vehicle that appeared to be occupied by a middle age gentlemen in the driver's seat. I ran a driver's status check of the registered owner of the vehicle. The registered owner was identified to be Arianna N Two-Crow, DOB: 06/12/2001. Arianna showed a suspended driving status.

I exited the park and ride and drove westbound onto CTH RK before I turned around and headed back toward the Park and Ride. I observed that this Ford sedan went mobile and was now eastbound on RK at the roundabout for Packerland Drive. The vehicle then continued southbound on Packerland Drive. I decided that I was going to conduct a traffic stop on the vehicle as the registered owner Arianna, had a suspended driving status. I conducted a traffic stop on this vehicle near 110 Packerland Drive in the City of Green Bay (Brown County, WI). The vehicle then pulled into the parking lot and parked into a parking stall. It took the vehicle approximately 27 seconds from the time I activated my emergency lights to when the vehicle pulled into a parking stall to stop. I found this behavior to be odd due to the fact that the parking lot was empty and the vehicle did not stop right away after getting off the roadway. I activated my spotlight and overhead take down lights.

Upon my approach, I observed that there was a child in a car seat behind the front seat passenger and there was a male seated behind the driver. The child was later identified to be A.D., [a one-year-old child] and the male was later identified by Oneida National photo identification to be Caydence S Cornelius, DOB: 08/18/2004. A.D. appeared to be in a car seat. I observed that Caydence was putting his hands in his pockets. I told Caydence to keep his hands out of his pockets. I identified the driver to be Arianna. I advised her that she was a suspended driver. I obtained a form of Wisconsin Photo Identification for the front seat passenger. She was identified to be Mercedes I Ackley. I asked the individuals in the vehicle what they were doing and Arianna advised that they were just going to the park. I found this response to be odd since Pamperin Park was in the opposite direction of where they were going. It was also getting dark and I know that the Brown County Parks close around sunset or dusk. Arianna advised me that they were just taking a loop when I asked why they went this way.

I had Arianna step out of the vehicle to have a face to face conversation with her away from the other occupants of the vehicle. Arianna stepped out of the vehicle and I spoke to her behind the rear of her vehicle. Arianna advised me that she was headed to drop Mercedes off and then head to the park with her baby, A.D. I asked Arianna who the male was seated behind her and she indicated that it was Mercedes' friend. Arianna advised that she just picked up Caydence in the park and ride that she was at. Arianna said the male was in a white suburban. Arianna then appeared disappointed and moved her head back and forth and then tilted it back before crossing her arms over her chest. Arianna then stated that she has her baby and that she cannot get him taken away and that she could not go to jail tonight. I found this voluntary response from Arianna to be alarming as it appeared to be out of nowhere and raised my suspicious of something criminal going on. I asked Arianna if there is something I should be aware of and she replied, that she did not know what Caydence had on him. Arianna stated that she just picked him up.

I had Mercedes step out of the vehicle. I spoke to her behind the vehicle. Mercedes had a strong odor of intoxicants emanating from her person when I was standing near her speaking to her outside the vehicle. Mercedes indicated that she knows Caydence from Facebook.

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Mercedes advised that they were just going to go to the park. When I asked Mercedes about why they did not go to the park right away she indicated something to the effect of they thought it was closed. Mercedes did not indicate that she was going to be dropped off by Arianna prior to going to the park. Mercedes confirmed that she only knew Caydence from Facebook. I asked to see messages between her and Caydence on Facebook and Mercedes smiled and said no. I asked Mercedes if there was something going on that should not be going on and she smiled again and said no. Mercedes said that she just met Caydence on Facebook and was meeting up with him. I had Mercedes get back into the vehicle and I had Caydence step out of the vehicle.

Caydence consented to a search of his person. Caydence had two phones in his pocket. Caydence told me that he used one phone for a "hot spot." I believe that hot spot to mean internet. Nothing else of evidentiary value was located on his person during the search. I asked Caydence how he knew the people in the vehicle and he replied that "his girl" was in the front. Caydence indicated they have been talking for a bit and have communicated through Facebook. Caydence indicated that they were supposed to go to the park. While he did this he pointed toward the general direction of Pamperin Park. Caydence stated that he was going to go eat and chill. Caydence stated there was nothing illegal in the vehicle. The Brown County Dispatch Center confirmed that Caydence was on probation for possession of narcotic drug among other charges.

I spoke to Caydence further and he stated that he arrived at the park and ride with Mercedes and Arianna, which was contradicting what I was earlier told from Arianna. Deputy A Lau arrived on scene while I spoke to Caydence further. I confronted Caydence on some of the conflicting information that I was receiving. I again asked Caydence if there was anything in the vehicle. I told Caydence to be honest and he said that there was nothing that he knew of in the vehicle.

I went back up to the vehicle and spoke to Mercedes and Arianna. I asked them why it smelled like alcohol. Mercedes admitted to drinking alcohol. Arianna denied drinking. I asked if Mercedes or Arianna knew Caydence's history. I advised him that he is on probation for possession of a narcotic drug. Arianna seemed surprised by this. I then confronted Mercedes and Arianna on what the real objective of tonight was tonight. I expressed my concern for the child, A.D. being in the car with someone on probation for possession of narcotic drugs. I asked for consent from Arianna to search the vehicle. Arianna denied consent to search the vehicle.

I advised Mercedes that I was going to pat her down for weapons. While performing my pat down, I felt a round hard object with a narrow cylindrical tip in Mercedes front left jacket pocket. This felt like it was in a form of a screwdriver. I asked Mercedes what it was and she said it was a "cartridge." The item was a black electric vape pen. There was a glass vial on the vape pen that had a yellowish brown liquid in side of it. Based on my training and experience as a police officer, I know that the liquid inside of THC vape pens looks similar to the liquid I observed. Mercedes said that this was THC when I asked if it was THC.

I conducted a search of the vehicle. I located a green flaky plant like substance that was wrapped in a plastic wrapper. This was located in the center console cup holder. The substance later field tested positive to be THC. I then located a black Springfield Armory 9 mm handgun on the floor under the driver's seat. The gun was not in a holster or a case. The area

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where the handgun was located was directly in front of where Caydence was seated in the vehicle and near where his feet would be located when seated in the vehicle. The gun had a magazine with rounds seated in the magazine well. There was not a round in the chamber. The area where the gun was located would have been accessible to Caydence. The handgun had a serial number of #S3843994. I later located a green flaky plant like substance in the driver's seat back pouch that was directly in front of Caydence. This green flaky plant like substance was concealed in an empty nicotine vape pen cardboard box. This later field tested positive for marijuana.

I then read Caydence his pre interrogation warning from the metal Brown County Sheriff's Office Miranda warning card. At approximately 7:38 pm, Caydence agreed to speak to me. Caydence told me that the gun was "Jeremy's." Caydence indicated that Jeremy was registered and was family. Caydence said Jeremy forgot to pick it up. I found this response from Caydence to be contradicting to what I learned from Arianna and Mercedes that they only knew Caydence from Facebook. I told Caydence that this was concerning that there was a gun near a child in the vehicle. I also told him that where the gun was located in the vehicle, that is a spot commonly used to conceal items especially by someone in the backseat.

While Mercedes was looking for her purse in the vehicle, she alerted Deputy Lau that there was a pistol magazine in a shoe that was in the back seat of the vehicle in close proximity to where A.D. was. I seized this pistol magazine that had rounds in it as well.

I transported Caydence to the Brown County Jail. An earlier completed criminal history check confirmed that Caydence was a convicted felon and was disqualified from possessing a firearm.

These charges are appropriate as no one took ownership of the marijuana located in the vehicle. The marijuana was within reach of all three subjects.

I tested the green flaky plant like substance located in the plastic wrapper. The test results are as follows: I took a sample of the suspect plant material from Exhibit #2 and tested it using the Duquenois Levine Reagent Test. I observed the following. After breaking the first ampoule, no color change was observed. After breaking the second ampoule, I observed the liquid turn purple. After breaking the third ampoule and rotating the packet one-quarter turn, I observed a separation in the purple color, light over dark. These observations indicate a positive test for marijuana, which contains THC, a controlled substance.

I weighed the marijuana and it weighed approximately 0.23 grams

I tested the green flaky plant like substance located inside the nicotine vape box in the back of the driver's seat. The test results are as follows: I took a sample of the suspect plant material from Exhibit #6 and tested it using the Duquenois Levine Reagent Test. I observed the following. After breaking the first ampoule, no color change was observed. After breaking the second ampoule, I observed the liquid turn purple. After breaking the third ampoule and rotating the packet one-quarter turn, I observed a separation in the purple color, light over dark. These observations indicate a positive test for marijuana, which contains THC, a controlled substance.

I weighed the marijuana and it weighed approximately 0.93 grams.



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2. Your complainant's review of the records of the Wisconsin Circuit Court Access Program (CCAP) website, which records are presumed truthful and reliable as they are kept in the normal and ordinary course of departmental business. These records indicate that Caydence S Cornelius, DOB: 08/18/2004, the defendant, was charged with Vehicle Operator Flee/Elude Officer, 1<sup>st</sup> Degree Recklessly Endangering Safety, Drive or Operate Vehicle without Consent, amongst other charges, in Shawano County Case Number 22CF115. These same records indicate the defendant appeared for an initial appearance in Shawano County Court on March 1, 2022 and a \$5000 cash bond was set. On March 15, 2022, the \$5000 cash bond was posted on the defendant's behalf and he was released from custody. Your complainant is aware that a standard condition of bond is that the defendant shall not commit any crime and that a specific condition of his bond is that he is to maintain absolute sobriety and have no possession of illegal drugs. These records indicate that said bond was in full force and effect on March 15, 2024.

3. Your complainant's further review of the records of the CCAP website, which records indicate that Caydence S Cornelius, the defendant, was the defendant in Brown County Case Number 22CF1739. Said records indicate that on or about October 23, 2023, there was a disposition in said case with a Judgment of Conviction on a charge of Bail Jumping, a felony contrary to sec. 946.49(1)(b) Wis. Stats. Said conviction remains of record and unreversed, making the defendant a felon and a repeater.

4. Your complainant's further review of the records of the CCAP website, which records indicate that Caydence S Cornelius, the defendant, was the defendant in Brown County Case Number 23CF212. Said records indicate that on or about October 23, 2023, there was a disposition in said case with a Judgment of Conviction on a charge of Possession of Narcotic Drugs, a felony contrary to sec. 961.41(3g)(am) Wis. Stats. Said conviction remains of record and unreversed, making the defendant a second and subsequent offender.

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

Subscribed and sworn to before me on  
03/18/24

Electronically Signed By:

J. Foss Davis

Assistant District Attorney

State Bar #: 1105914

Electronically Signed By:

Jessica R. Gereau

Complainant