

**FILED**  
**02-09-2022**  
**Clerk of Circuit Court**  
**Brown County, WI**  
**2022CF000237**  
**Honorable John P.**  
**Zakowski**  
**Branch 6**

<b>STATE OF WISCONSIN</b>	<b>CIRCUIT COURT BRANCH</b>	<b>BROWN COUNTY</b>
STATE OF WISCONSIN Plaintiff,  vs.  ANTHONY JOHN KOLOSSO 983 Shawano Avenue Green Bay, WI 54303 DOB: 02/20/1959 Sex/Race: M/I Eye Color: Hazel Hair Color: Brown Height: 5 ft 9 in Weight: 170 lbs Alias:  Defendant.	DA Case No.: 2022BR001105 Assigned DA/ADA: Aaron S Linssen Agency Case No.: 22-205424 Court Case No.: 2022CF ATN:	<b>CRIMINAL COMPLAINT</b>

*For Official Use*

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

**Count 1: 1ST DEGREE CHILD SEXUAL ASSAULT - SEXUAL CONTACT WITH A CHILD UNDER AGE 13**

The above-named defendant on or about Sunday, August 1, 2021, in the City of Green Bay, Brown County, Wisconsin, did have sexual contact with a person who has not attained the age of thirteen, LTS, a four year old child, contrary to sec. 948.02(1)(e) Wis. Stats., a Class B Felony, and upon conviction may be sentenced to a term of imprisonment not to exceed sixty (60) years.

**Count 2: EXPOSING GENITALS**

The above-named defendant on or about Sunday, August 1, 2021, in the City of Green Bay, Brown County, Wisconsin, for purposes of sexual arousal or gratification, did expose his genitals to a child, contrary to sec. 948.10(1)&(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.

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 he/she has had the opportunity to review the police reports from Officers Brenteson and Pakkala of the Green Bay Police 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

STATE OF WISCONSIN - VS - Anthony John Kolosso

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 his 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 reviewed the report of Officer Brenteson of the Green Bay Police Department which indicates the following information:

On February 1st, 2022 I, Officer Brenteson in full uniform patrol and in a marked squad car was working as unit 3A1. At approximately 21:26 hours I was dispatched to XXX Shawano Ave., Apt. X, Green Bay, WI 54303, county of Brown for a Sexual complaint. CAD notes indicated the complainants 4 year old son LS, later verbally identified as LS (age 4) was raped by his great uncle Anthony Cornelius, believed to be Anthony Guy Cornelius DOB: 03/15/1961. The complainant whom was later verbally identified as AW, wanted to meet Officers at her residence of \*\*\*\* S Memorial Dr. Green Bay, WI 54313.

Upon arrival I spoke with AW about this incident. She stated that her and her significant other were in their bedroom alone and that her son LS briefly walked in on them. LS was told to leave the room and when AW followed behind to talk with LS he began talking about an incident that occurred at his great grandmother's residence last summer. LS mentioned seeing his great uncle Anthony naked in the chair next to him. LS mentioned seeing Anthony's "pee pee" going up and down.

Later that night LS went to bed. He woke up to Anthony on top of him, naked and moving up and down on top of LS. LS yelled and cried due to Anthony causing him pain but nobody came. Eventually Anthony finished and LS remembered that the blankets were "stinky".

I asked AW to have LS come out and talk with me. In talking with LS he appeared to be very nervous, not able to stand still nor pay attention to much of what I was asking him. LS did however confirm that Anthony was naked around him but only was able to confirm details such as Anthony moving his "pee pee" up and down when asked specifically by AW.

Due to LS's age and him not appearing to be comfortable talking with me about the incident I told AW he could go back into the residence. I asked AW if she would provide me a written statement based on the information LS had told her, which she agreed and is as follows:

On February 1st, 2022 I, AW am giving Officer Brenteson of the Green Bay Police Department a voluntary written statement. On January 29th, 2022 at approximately 13:00 hours my son LS [age 4] informed me of an incident that occurred with his great uncle Anthony Guy Cornelius DOB: 03/15/1961. Around August 2021, LS was with Anthony at the residence of ESF whom is the great grandmother of LS. While there Anthony was naked around LS touching his penis. Later that night LS woke up the Anthony naked and on top of LS moving back and forth. LS told me that he had his clothes on during this but I did not ask if anything had penetrated him. To see her full statement I have the signed copy attached in GERP.

AW indicated she did not believe ESF knew about this but was not sure as AW was sexually assaulted as a child and ESF knew and did nothing to stop it. AW did not know what clothes

STATE OF WISCONSIN - VS - Anthony John Kolosso

LS had on during the incident but believed they would have been washed numerous times by now. AW was provided a victim rights form and informed that I would be contacting CPS due to this incident involving a child. I also mentioned that with LS's age and apparent nervousness in talking with me about this incident, a CAC interview would be conducted. I explained to AW what a CAC interview was and she was very appreciative that this was an option. I informed AW that if she had no further questions that a detective would likely be reaching out to her when the appointment is set up. AW was released back to her residence.

3. Your complainant reviewed the reports of Detective Pakkala of the Green Bay Police Department which indicate the following information:

LS's forensic interview started at 8:47 AM on 02/08/22. KS was the forensic interviewer and I watched the interview in real-time from the observation room.

KS brought LS back to the interview room. He did not appear to be under any distress. He was talking with KS on their way to the room about the sounds that animals make and was counting. KS had LS sit in a chair and introduced herself again and told him that it was her job to talk and listen to kids. LS said he knew a [person with the same first name as KS].

KS told LS she wanted to show him things about her room. KS pointed out one camera in the room and there was one more. KS asked LS to look for it with her. He found it right away and pointed. They counted the cameras and one microphone. KS said that the cameras were taking their picture and the microphone was taking their words into another room where there were two people watching and listening to them today. KS asked LS if he had any questions about that and he said "yeah." He told KS that he can share, and he shared his yellow baseball bat and his soccer ball that was green and blue. KS thanked LS for sharing this.

KS told LS that she wanted to tell him about her board next. KS said she had a box of markers, and they would draw on the board, but first she wanted to know how well LS knew his colors. KS would hold up a marker and LS would name the color. He got them all right.

KS held up the blue marker. She asked LS what he would say to her if she told him that marker was black. LS said "blue." KS thanked LS for correcting her and said that if she got something wrong again that she wanted him to correct her.

KS said the next thing they were going to do was draw a face on the board. She asked LS to pick out a marker, and he chose blue. KS told LS to make a big circle on her board and he did. KS asked if he could see it okay as the circle was lightly drawn. LS said "I CAN SEE IT I CAN SEE IT." KS asked what was in a face and LS drew eyes and a smile. He was able to name the parts he drew eyeballs to look at things and a mouth to eat food. KS asked LS what he liked to eat, and he said, "hamburger meat." They also added hair.

KS showed LS how to take a picture of what he drew on the board. He pushed the camera button and KS told him that when the camera flashes, a picture is being taken. KS asked LS if he had questions about this and he told her that he knew how to draw a happy face and hair.

KS told LS that she was just meeting him and didn't know much about him. KS asked LS how old he was, and he held up 4 fingers. KS thanked him for sharing that with her. KS said that she understood that LS went to Chuckie Cheese recently. LS asked KS how she knew that

STATE OF WISCONSIN - VS - Anthony John Kolosso

and KS told him that his momma told her. She asked LS what he did at Chuckie Cheese. LS said he played with balls, and they fell down on his head. LS demonstrated with his hands how the balls fell on his head.

LS told KS that he was in a blue circle. She asked LS if she got that right or wrong and LS held up his thumb and said "right." LS talked about how the balls showered his head and His brother's head and that it didn't hurt. LS also said he had to watch out for the balls, and he was trying to put the balls in the little circle. They talked more about the balls and the circle.

KS asked LS to tell her more about His brother. LS said that His brother always sleeps and plays with him. His brother also opened LS's eye with his finger. LS demonstrated this for KS.

KS told LS that she wanted to tell him more about their talk today. She told LS that if she ever asked him a question today and he didn't know the answer, it was okay to say I don't know. Then they practiced this concept. KS told LS that she had told him her first name was KS. She asked LS what her last name was, and LS said a name but I could not understand what he said. KS corrected him saying that he was never told her last name and it was okay to say, "I don't know." They tried again. KS asked LS if he ate breakfast today and he nodded his head. She asked LS what he ate, and LS said "waffles." KS asked LS what she had for breakfast. LS said, "maybe pancakes." KS said that she didn't tell him what she ate for breakfast so he would say "I don't know." KS said they would try one more time. She asked LS what the name of her dog was and LS said, "I don't know." KS thanked LS for not guessing.

KS said that when they talk, she was going to ask that they only talk about things that are true, things that are right. KS asked LS if they were inside or outside, and LS said they were inside. KS asked LS if she said that they were standing outside, would that be a truth or a lie? LS said, "a lie." KS asked LS if she said they were inside, would that be a truth or a lie? LS put his thumb up and said, "a true." KS asked LS if he thought it was important to tell the truth and he said yeah. KS asked LS what would happen if a kid told a lie and a grown up found out. LS said the kid would get beat up. KS told LS that when they talk today, she promised to talk about things that are true, that really happened, and then asked LS if he could promise the same and he said "yeah."

KS mentioned that LS had shared about his soccer ball, his baseball bat and going to Chuck E. Cheese. Now KS wanted to learn about his family. KS asked LS who he lived with, and he said mommy and daddy, and His brother. KS asked LS who was His brother. LS said that he always lived with him, and he wanted to go to a new house. LS went on about wanting to go to a new house, but mommy didn't want to. LS confirmed that His brother lived at his house.

KS asked LS what he came here to talk about today and he said that he didn't know. KS asked what mom said about coming today and LS said he didn't know. KS mentioned that LS had told her about the family he lived with, and then asked LS to tell her about other people in his family. LS said he did not have other people in his family. He just had three people.

KS asked LS who were other people he would visit or spend time with, and LS said B's house. KS asked who else's house he went to, and LS said Papa John's (his maternal grandfather is John) and he also went to B's house a lot. KS said that sometimes she talks to kids about grandmas. She told LS that she understood he had a grandma named E. LS said yeah.

STATE OF WISCONSIN - VS - Anthony John Kolosso

KS asked LS to tell her about Grandma E's house. LS said something about Grandma that was hard to hear over the noise the chair was making as he was moving around on it. KS asked LS who else lived at Grandma's house. LS stopped moving, looked at KS and said, "Uncle Tone" (spelling unknown). KS asked more about Uncle Tone and LS said he did not want to talk to her about it. KS asked "how come?" LS said, "because Uncle Tone was naked."

KS repeated "Uncle Tone was naked" and LS nodded his head to say yes. KS asked LS to tell her everything he saw with his eyes when Uncle Tone was naked. LS said Uncle Tone was "shaking his pee pee." KS asked what else Uncle Tone was doing and LS said he was sitting and shaking his "pee pee." KS repeated back that Uncle Tone was laying down and shaking his "pee pee."

KS asked LS where he was when Uncle Tone was shaking his "pee pee" and LS reported he was "right by Uncle Tone." KS asked LS what Uncle Tone used to shake his "pee pee" and LS said he (Uncle Tone) was going on him naked and moving up and down. KS thanked LS for sharing that with her and asked him to tell her everything he felt on his body when this was happening. LS said he heard something. KS asked him to tell her what he heard, and LS said, "I don't know."

KS confirmed that Uncle Tone was naked and on top of LS with LS. KS asked LS where his clothes were when this was happening, and he said they "were on me the whole time." KS asked LS what he could hear with his ears when Uncle Tone was on top of him, and LS said he couldn't wiggle his back because Uncle Tone was on him. KS asked what part of LS's body Uncle Tone was on, and LS said something I couldn't understand about telling Uncle Tone something and Uncle Tone didn't listen.

KS asked LS what part of LS's body was Uncle Tone touching when Uncle Tone was on top of him, and LS said "mine." KS asked if it happened on the front of LS's body, the back of LS's body or something different. LS said, "the back of my body." KS asked LS to tell her everything he felt on the back of his body when Uncle Tone was on top of him. LS said Uncle Tone was on him and he didn't have clothes on. LS said Uncle Tone lived with G.G. and KS asked who G.G. was. LS said G.G. lived with Uncle Tone. KS asked LS where G.G. was when Uncle Tone was on top of him and LS said she was in her room, sleeping.

KS asked LS where he was when Uncle Tone was on top of him. LS looked up at the picture of sloths on the wall and talked about that for a bit. KS got him to sit down again and asked him where he was when Uncle Tone was on top of him. LS said he was on Uncle Tone's bed. LS said that Uncle Tone put his clothes back on. KS asked LS to tell her about Uncle Tone putting his clothes back on. She asked how Uncle Tone's clothes got off and LS said something about the clothes being too big or too tight and he had to get new clothes.

KS asked LS to tell her more about what Uncle Tone's bed looked like. LS said Uncle Tone was gray and had something on his face - LS used both fingers to draw around his mouth, like he was talking about some sort of facial hair. KS asked LS to tell her more about the gesture he made, and LS said that Uncle Tone didn't care about Buddy. KS asked who Buddy was and LS said "everybody." KS asked LS to tell her more about that and LS said something about Uncle Tone being too tired to get new clothes and about how he (Uncle Tone) was going to go to his home.

STATE OF WISCONSIN - VS - Anthony John Kolosso

KS told LS that he had shared about Uncle Tone's "pee pee" and LS said "yeah." KS asked LS to tell her more about Uncle Tone's "pee pee." LS said, "I don't know." KS asked LS what Uncle Tone's "pee pee" looked like. LS said "gray." KS asked what else and LS said he didn't know.

KS asked LS to tell her everything that Uncle Tone's "pee pee" was doing it when Uncle Tone was shaking it. LS said he didn't know. KS asked what Uncle Tone used to shake his "pee pee" and LS said he didn't know. LS was sliding all over the chair, on to the ground and back to the chair at this point. KS asked what words and sounds LS could hear when Uncle Tone was shaking his "pee pee." LS made a sound like almost like a vacuum cleaner or white noise (9:08:39). KS asked LS to tell her more about hearing that and LS said he didn't know and started to make animal sounds.

KS asked if anything else happened with Uncle Tone and LS said he didn't know. KS said that LS had shared that this happened in his (Uncle Tone's) room and asked if it happened in any other rooms and LS said no, just in the living room. LS said Uncle Tone was naked in the living room. KS asked more about that, and LS said he didn't know. LS did not know where G.G. was when Uncle Tone was naked in the living room, and he (LS) was in the living room too.

KS asked LS to tell her everything he saw Uncle Tone do in the living room and LS said Uncle Tone would always take off his clothes and he would always wear hats. Sickle asked what happened when Uncle Tone took his clothes off and LS said he would put his clothes back on. KS asked what happened to Uncle Tone's body when his clothes were off, and LS didn't know.

KS said that they had talked about Uncle Tone having his clothes off in his room and the living room. LS nodded. KS asked if anything else happened in another room and LS shook his head no. KS asked if Uncle Tone took his clothes off at any other house and LS shook his head. KS asked LS what it meant when he moved his head like that, and LS said that is was an "X" and it means no.

KS asked LS who else knew about Uncle Tone shaking his "pee pee" and going on top of him and LS said, "I don't know." KS said that she understood that LS told him mom. LS said "yeah." KS asked him to tell her more about telling mom. LS said he didn't know. KS asked why he told mom and LS said he "just told mom" and then said something unintelligible.

KS asked if there was ever a time when LS had to touch Uncle Tone's body and LS said yes, but when asked to tell more, he said "I don't know." KS asked if anyone else shook their "pee pee" at LS and he shook his head no. KS asked if anyone else had gotten on top of LS other than Uncle Tone and LS yelled "NO!"

KS said that they had been talking for a long time and asked LS if he had any questions for her and he said no, he had no questions. KS asked LS what Uncle Tone used his "pee pee" for and LS said, "to lay on his bed." LS said every time that the kids go to Uncle Tone's house, Uncle Tone takes off his clothes. LS asked to go to a new room.

KS asked LS what a boy uses a "pee pee" for and LS said, "peeing and pooping in the toilet." KS took out a cookie cutter picture of a boy. She asked LS to pick out a marker to use and he picked out black. KS said that the boy was missing a face asked LS to draw it in, and he did. LS also made a shirt for the boy in the picture so he wouldn't be naked. KS gave LS a green

STATE OF WISCONSIN - VS - Anthony John Kolosso

marker and asked LS to draw a circle around where a boy's "pee pee" is and LS drew a line at the crotch area of the picture. KS asked what came out of a boy's "pee pee" and LS said, "peeing in the toilet."

KS asked LS if there was anything else that he wanted her to know, and LS said no. KS thanked him for talking today and said that she understood he had a birthday coming up and they ended the interview talking about his birthday. KS brought him out to his mom after the interview ended.

I met with AW after LS's interview and check-up. AW said that the last time LS and [his brother] were by Uncle Tone was July or August of 2021. She noticed that LS was acting more sexualized around this time, touching his penis, being "obsessed" with buttocks, "humping" things, wanting people to touch people, and even tried to pull AW' pants down when she was sleeping. AW talked to him about this behavior at this time but LS did not disclose anything at summer time.

I asked AW if the name that she had given police, Anthony Cornelius, was the right name. AW thought for a second and said no, she got it wrong. She has relatives that are Cornelius, but this was Anthony Kolosso, her father's relative. Anthony J. Kolosso (02/20/59) was Uncle Tone. This information was verified through GERP and Wisconsin Circuit Court Access. AW said Kolosso was her uncle and LS's great uncle. AW explained that Kolosso had been beaten to the point of disability when he was in the service because he told on some fellow soldiers. He also had PTSD and schizophrenia. She said he lived with his sister, ESF, who LS had called "G.G.". ESF is AW's grandmother.

AW said her father had sexually assaulted her back in 2002 so as a victim herself she was always sensitive to sexual assault. Her dad told her that this should have been handled within the family and she should not have gone to police. Her dad also said that one of his family members had a lot of money and would be able to beat her in court. This worried AW.

AW did not know much other information about Anthony Kolosso. She said they used to be close and she remembered him being a nice man.

On 02/08/22, around 11:15 AM, Detective Craig Pakkala, K9 Officer T. Conley, Officer N. Henning and I went to 983 Shawano Ave. Apt #1 [located in Green Bay, WI] to arrest Anthony Kolosso. [Detective Pakkala told your complainant that this is the same address as the alleged assault]

ESF opened the door and confirmed that Anthony was there. He came to the door and Officer Conley had him step into the hallway. I explained that LS had made allegations of sexual abuse and he was being arrested based on those allegations. ESF told Kolosso not to talk to anyone without a lawyer. She explained that she was his power of attorney and he also had a payee. ESF said that Kolosso had the cognitive level of a 5th grader.

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

STATE OF WISCONSIN - VS - Anthony John Kolosso

Subscribed and sworn to before me on  
02/09/22

Electronically Signed By:

Jessica R Gereau

Assistant District Attorney

State Bar #: 1104660

Electronically Signed By:

Aaron Linssen

Complainant