

STATE OF WISCONSIN

CIRCUIT COURT
COMMISSIONER'S COURT ROOM A

BROWN COUNTY

STATE OF WISCONSIN,

Plaintiff,

vs

CRIMINAL COMPLAINT

SEP 24 1996

Jeremy N. Cornelius
128 S. Baird Street
Green Bay WI 54301DOB: 02/26/79
SEX: Male

96CF

ORIGINAL
LYNN VERHEYEN
CLERK OF COURTS
BROWN COUNTY, WI

Defendant.

Complainant, Mary M. Kerrigan-Mares, an Assistant District Attorney for Brown County, Wisconsin, being first duly sworn, on oath deposes and says that on or between June 1, 1993 and December of 1995 at the City of Green Bay in said County, State of Wisconsin, the defendant did:

have sexual contact/~~intercourse~~ with a person who has not attained the age of 13 years, to-wit: S.C., DOB 03/24/87; FIRST DEGREE SEXUAL ASSAULT OF A CHILD-Felony, contrary to Section 948.02(1), Wisconsin Statutes.

The offense is defined as a Class B Felony; upon conviction of the offense, the defendant is subject to imprisonment of not more than 40 years.

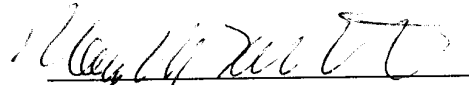
that the basis for the complainant's charge of such offense is:

Complainant, Mary M. Kerrigan-Mares, is an Assistant District Attorney for Brown County, Wisconsin, and knows of the above offense on information and belief based upon:

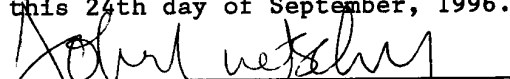
1) The basis for complainant's charge of this offense is her review of the reports of Sgt. Randy Winkler of the Green Bay Police Department whom she has worked with in the past and she believes to be truthful and reliable in this instance. This complaint is further based on the statement given by Jeremy N. Cornelius, DOB: 2/26/79 who on January 4, 1995, voluntarily admitted that approximately 2 1/2 years prior he began having sexual contact with his sister, S.C., DOB: 3/24/87. Jeremy stated that the first time was when she was in first grade and that he would lay on top of her and his penis and her vagina would touch. He states that the first time this happened that he remembered they lived in Green Bay on Dousman Street and that he brought her in to a closet and had her take her clothes off. Jeremy states that he had his penis out and he had her lay on the floor, and he touched her vagina with his hand. He states that after this he laid on top of her and rubbed his penis over the top of her vagina, but that he did not put it inside of her vagina. He states further that he then had her get on top of him and that he moved around and kissed her vagina and breast. He states that when they lived on Dousman he had sexual contact with her approximately three times and that it was "always the same

every time". He states that they then moved to DePere and that he had sexual contact with her once a month when they lived in DePere after moving in January of his freshman year. He states that he did these same things as when he lived on Dousman and that he would touch her with his hands, touch her vagina with his penis and kissed her vagina and breast. He states that they lived in DePere for approximately a year and one half months and then then moved back to Green Bay and he continued to have sexual contact with S.C. approximately once a month. Jeremy states that the last time he had sexual contact with S.C. was approximately three weeks before Christmas of 1995. He states that this time was different than the other times because he touched her over the top of her clothes while laying next to her. Jeremy states that he does not remember telling S.C. not to tell and that she did tell once when they were living on Dousman. Jeremy states that after his mother was informed, she told him that he could not do that anymore but he continued to have sexual contact with S. C. He states that he also had sexual contact with his other sister, M.C. and that happened approximately four years ago and they both had their clothes on when laid on top of her.

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


Complainant

Hereby approved for filing and
subscribed and sworn to before me at
Green Bay, Brown County, Wisconsin,
this 24th day of September, 1996.


Assistant District Attorney