

FILED
02-24-2023
Clerk of Circuit Court
Kenosha County
2023CF000307
Honorable Gerad T.
Dougville
Branch 1

STATE OF WISCONSIN CIRCUIT COURT KENOSHA COUNTY

STATE OF Wisconsin
 Plaintiff,

CRIMINAL COMPLAINT

vs.

DA Case #: 2023KN000149

ALYSSA L JURASIK

Agency Case #: KSD 2022-00333841

1935 Sheridan Rd
Kenosha, WI 53140
DOB: 05/11/2000
Sex/Race: F/W
Eye Color: Brown
Hair Color: Brown
Height: 5 ft 6 in
Weight: 128 lbs

and Christian G. Irizarry-
Melendez,

Defendants.

For Official Use

The undersigned, being first duly sworn, states that:

Count 1: MAINTAINING A DRUG TRAFFICKING PLACE - PTAC, AS A PARTY TO A CRIME, ON OR NEAR A PARK

The above-named defendant on or about and between the dates of April 11, 2022 - August 17, 2022, in the City of Kenosha, Kenosha County, Wisconsin, as a party to a crime, did knowingly keep or maintain a dwelling which is used for delivering controlled substances in violation of chapter 961 Wis. Stats., contrary to sec. 961.42(1), 939.50(3)(i), 939.05, 961.49(1m)(b)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 further, invoking the provisions of sec. 961.49(1m)(b)1 Wis. Stats., because the above offense occurred within 1000 feet of a park, Petretti Park, the maximum term of imprisonment prescribed by law for that crime may be increased by 5 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: POSSESSION WITH INTENT TO DELIVER THC (TETRAHYDROCANNABINOLS) (>200 - 1000G) - PTAC, AS A PARTY TO A CRIME, ON OR NEAR A PARK

The above-named defendant on or about Wednesday, August 17, 2022, in the City of Kenosha, Kenosha County, Wisconsin, as a party to a crime, did possess with intent to deliver a controlled substance, to-wit: Tetrahydrocannabinols (THC), in an amount of more than 200 grams but not more than 1,000 grams, or more than 4 plants containing tetrahydrocannabinols but not more than 20 plants containing tetrahydrocannabinols, contrary to sec. 961.41(1m)(h)2, 939.50(3)(h), 939.05,

961.49(1m)(b)1 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. 961.49(1m)(b)1 Wis. Stats., because the above offense occurred within 1000 feet of a park, Petretti Park, the maximum term of imprisonment prescribed by law for that crime may be increased by 5 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 3: POSSESSION OF NARCOTIC DRUGS - PTAC, AS A PARTY TO A CRIME, POSSESSION OF A CONTROLLED SUBSTANCE ON OR NEAR CERTAIN PLACES

The above-named defendant on or about Wednesday, August 17, 2022, in the City of Kenosha, Kenosha County, Wisconsin, as a party to a crime, did knowingly possess Methylphenidate Hydrochloride, a controlled substance included in Schedule I or Schedule II which is a narcotic drug,, contrary to sec. 961.41(3g)(am), 939.50(3)(i), 939.05, 961.495 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. 961.495 Wis. Stats., because the above offense occurred within 1000 feet of Petretti Park, the Court shall impose 100 hours of community service work for a public agency or a nonprofit charitable organization. The court shall ensure that the defendant is provided a written statement of the terms of the community service order and that the community service order is monitored. Any organization or agency acting in good faith to which a defendant is assigned pursuant to an order under this section has immunity from any civil liability in excess of \$25,000 for acts or omissions by or impacting on the defendant.

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.

PROBABLE CAUSE:

Kenosha County Sheriff's Department (KSD) Detective Joshua Schreiner reports that he is assigned to the Kenosha Drug Operations Group (KDOG). Detective Schreiner reports as follows:

“On 08-16-22 at approximately 8:48 AM I was contacted by United States Postal Service (USPS) Inspector E. Meidlinger who reported that a suspicious package weighing 10 pounds 8 ounces, addressed to 1935 Sheridan Road which is located in the City and County of Kenosha, State of Wisconsin, was intercepted on 08-11-22 by USPS. Inspector E. Meidlinger stated that the package was addressed to Christian Melendez at the above address and that the package entered the mail stream in Las Vegas, NV.

Inspector E. Meidlinger advised that the package was emanating a strong odor consistent with marijuana. Furthermore, Inspector E. Meidlinger advised that the package met the

USPS' criteria of being suspicious and possibly containing narcotics due to several factors which I later outlined in the affidavit of a search warrant.

Inspector E. Meidlinger stated that a subject called the postal service several times attempting to track this package. Inspector E. Meidlinger advised that the subject identified himself as Christian Melendez and he provided the address of 1935 Sheridan Road as well as a telephone number of 787-238-3766. Inspector E. Meidlinger stated that during one of these call-ins the subject advised that the package contained baseball cards for his daughter's birthday.

Inspector E. Meidlinger advised that he used the investigatory website CLEAR to identify this subject as Christian Gabriel Irizarry-Melendez with a date of birth of 04-29-1996. Furthermore, Inspector E. Meidlinger stated that Christian provided the same address and phone number on bank records that were updated in June of 2022.

Based on this information I started my investigation into Christian and this residence. A review of the Wisconsin Circuit Court Access website revealed that Christian had been cited for possession of marijuana in 2018 (Grant County Case Number 2018FO000490). Checking in-house records for 1935 Sheridan Road revealed that another resident at this address was Alyssa L. Jurasik (DOB: 05-11-2000). Alyssa is associated with Christian in Kenosha Police Department case number 2022-32268 from 07-02-22 for a "missing adult". The complainant, Christian, advised that he and his girlfriend, Alyssa Jurasik, were in an argument and that she exited his vehicle near Washington Middle School. Christian provided a phone number for Alyssa as 618-204-2391. Alyssa ultimately came home later and there were no criminal charges from this incident.

Searching the social media website Facebook, I located a profile for Alyssa Jurasik. This profile had several pictures posted to it which included pictures of a male and a female. Some of the pictures of the male matched the driver's license picture for Christian. According to a post on Alyssa's Facebook page, she and Christian were engaged in Las Vegas, NV, on 07-17-22. Las Vegas, NV is where the suspected marijuana package was shipped from. According to the Wisconsin Department of Justice Crime Information Bureau Christian's identification picture and address were both updated on 08-04-22.

On 08-16-22 at approximately 10:04 AM I responded to 1935 Sheridan Road and observed a gray 2009 Honda Accord bearing WI registration ALK9585 which was parked in the residence's driveway. This vehicle registers to Christian. Furthermore, on 05-02-22 this same vehicle was photographed at 1935 Sheridan Road via our automatic license plate reader. Checking the investigatory website TLO I found a vehicle currently registered to Alyssa. TLO advised that this vehicle was a blue 2013 Chevrolet sedan bearing IL registration Q246750. I checked our automatic license plate reader for Alyssa's vehicle which advised that the registration and vehicle had been pictured at 1935 Sheridan Road several times with the earliest being 09-12-21.

I made in-person contact with Inspector E. Meidlinger who brought the suspected marijuana package to the Kenosha County Sheriff's Department. I observed all of the suspicious indicators provided by Inspector E. Meidlinger. Furthermore, I could smell a strong odor consistent with marijuana emanating from the package. Based on the above information I

completed an anticipatory warrant for 1935 Sheridan Road which was signed by Judge J. Meier at 2:00 PM.

On 08-17-22 at approximately 6:58 AM Detective S. Becker responded to the area of 1935 Sheridan Road and observed both the Honda and Chevrolet registered to Christian and Alyssa parked at the above residence. At approximately 10:30 AM Inspectors E. Meidlinger and J. Tomas responded again to the Sheriff's Department. Inspector J. Tomas advised that he would do a controlled delivery of the suspected marijuana package which once accepted into the residence would trigger the anticipatory warrant that I obtained the day prior.

At approximately 11:40 AM members of KDOG, Deputy T. Tift #231, Deputy J. Booth #347, Deputy J. Wilson #334, and Inspector E. Meidlinger responded to the area of 1935 Sheridan Road. I took up a position of surveillance while Inspector J. Tomas responded to the residence to deliver the package. At this time I observed the gray Honda Accord parked in the residence's driveway and that the front entry door to the house was open with the storm door closed. At approximately 11:49 AM Inspector J. Tomas knocked on the residence's front door. After one minute and there being no answer, Inspector J. Tomas left the package near the front of the garage within view and left the area.

I continued to surveil the package where it sat. At 11:58 AM I observed Christian exit the residence and grab the suspected marijuana package left by Inspector J. Tomas and go back inside the house. I relayed this information to other units in the area. At 12:04 PM KDOG executed the search warrant. Deputy J. Booth and Deputy J. Wilson knocked on the residence's front door. Eventually, a male white subject exited the residence and he was verbally identified as Christian Melendez. From outside the front entrance of the residence, I could smell a strong odor consistent with marijuana emanating from the interior of the house. Christian was detained for the execution of the search warrant and placed in the back of Deputy J. Wilson's patrol vehicle. While being detained Christian stated that he had a handgun on the nightstand in his bedroom. Christian was currently found in possession of an Apple iPhone cellular phone. This cellular phone was seized for evidence.

KDOG cleared the residence and did not locate any other occupants inside. I conducted a quick cursory search of items in plain view within the residence. These items included several pieces of drug paraphernalia on both the first and second floor, mail containing both Christian and Alyssa's names, bud marijuana, THC vaporizer cartridges, marijuana blunts, garbage containing discarded tobacco from cigarillos (the cigarillo wrapper is often used to roll a marijuana blunt), and a Hi-Point semi-automatic 9mm handgun. I also observed the USPS package in one of the bedrooms upstairs. The package was open and some of the contents had been pulled out. The package contained marijuana/THC products in varying forms including bud and vaporizer cartridges.

Other members of KDOG and the Postal Inspectors conducted the evidentiary search of the residence while I responded to the Kenosha County Sheriff's Department Detective Bureau to interview Christian. Christian was transported to the department by Deputy J. Wilson who ultimately escorted him to a detective bureau holding cell. At 1:19 PM I escorted Christian to interview room #1 and initiated the camera system. At 1:20 PM I read Christian his constitutional rights to which Christian initially refused to answer questions. As I was completing the refusal of constitutional rights Christian advised that he did want to talk. I

confirmed with Christian that he wanted to talk on his own accord and that I did not persuade him in any way which Christian confirmed was accurate.

At 1:26 PM I re-read Christian his constitutional rights which he waived, signed, and agreed to answer questions. I initially obtained background information from Christian. Christian stated that he has resided at 1935 Sheridan Road for approximately two months. Christian said that he works as a "turbine tech" which often takes him overseas for work. Christian said that he has been doing this work for approximately two years and that it is not unheard of for him to be gone for two to three months at a time. Christian said that he makes approximately \$4,000 per week when he is working but that he was currently off of work due to an illness. Christian said that due to his erratic work schedule he has not had a permanent residence until recently.

Christian stated that his fiancé who he resides with at this residence is Alyssa Jurasik [identity later confirmed to be Alyssa L. Jurasik, DOB: 05/11/2000, co-defendant]. Christian was unable to provide Alyssa's date of birth or where she works. Christian stated that he has known Alyssa for a little over one year and that they were engaged in mid-July. Christian said that he believed that Alyssa has resided at 1935 Sheridan Road for approximately 1.5 to 2 years. Christian advised that Alyssa knows he smokes marijuana but that she does not partake due to her employment. Christian said that he smokes marijuana often and that he sometimes buys it from dispensaries in Illinois.

Christian stated that he has resided in Kenosha for 10 years and that his parents still live in Kenosha. Christian said that he has family in Puerto Rico and that he was unable to confirm any of his previous addresses.

I started questioning Christian regarding the narcotics he was found to be in possession of including the USPS package. At first, Christian's answers were deceptive. Christian stated that he was only supposed to get a "blade" from the package which is a tool he uses for work. Christian said he did not know what else was within the box. Christian eventually admitted that he knew the box contained marijuana products but that they were shipped to him from some random person he met in Las Vegas while he was there with Alyssa getting engaged.

Christian stated that he paid this random person \$600 to ship him the marijuana products that were within the USPS package. Christian stated that he did not know this person's name and that he had no contact information for this person. Furthermore, Christian stated that there would be no contact information in his phone for this person because they never spoke besides in person. I questioned Christian as to how he obtained a tracking number for the package if he never had contact with this person after providing him with \$600. Christian paused, smiled, and then stated, "Your good". Christian then proceeded to ask for more water.

Christian eventually stated that he wanted to be honest and tell the truth. Christian said that the marijuana was shipped to him by a co-worker of his named Kevin. Christian said that Kevin did him a favor because he (Christian) had rented an Airbnb for Kevin. Christian stated that based on their work schedule it wasn't unheard of for him to rent Airbnb's for his co-workers using his information. Christian advised that since Kevin owed him money Kevin

agreed to pick up marijuana products from dispensaries in Las Vegas and ship them to 1935 Sheridan Road. Christian stated that the address on the package (1920 Agua View Road, Mohave Valley, AZ) was the address of the Airbnb that Christian rented for Kevin.

Christian stated that he had text messages between Kevin and him concerning this deal. Christian said that this was the only time he has ever had Kevin send him marijuana/THC products in the mail. Christian agreed to allow me to look at his cellular phone but only at the text messages between him and Kevin. I provided Christian with his iPhone. Christian proceeded to unlock the iPhone. Once on the phone Christian went to his text messages and to a text string with a contact named "Kevin co worker". I briefly looked over these messages which seemed to at least partially confirm Christian's story. I noted that within one text message Kevin advised his last name was Kuilan. Christian advised that he did not want to sign a consent for his cellular phone and that he did not want to get anyone else in trouble. Christian did not have any further information to provide.

Detective S. Becker later advised me that over 560 grams of marijuana in assorted forms (wax, bud, vape) were collected from the residence as well as three Methylphenidate Hydrochloride pills located within a zip-seal style plastic bag consistent with the packaging of illicit street narcotics. Checking drugs.com these pills are a schedule 2 controlled substance and can only be obtained via a prescription.

On 08-18-22, I completed a search warrant for Christian's Apple iPhone. At 3:44 PM the search warrant was signed by Judge J. Meier. I have received advanced specialized training in mobile device forensic examination. I am a Cellebrite Certified Physical Analyst (CCPA). I activated the phone.

After unlocking the cellular phone I observed Christian to have three different money apps installed. These applications were Chime, Venmo, and CashApp. I observed Christian's Venmo account to have a \$0 balance and his username was @Christian-Irizarry-4. Within CashApp I observed Christian's CashApp username to be \$ChristmasxDom. I observed there to be a lengthy amount of transaction history with a good portion of the transactions being payments to Christian. I know through narcotic investigation experience that dealers will often take payments via apps such as the three listed above. Furthermore, I noticed that Christian was frequently cashing money out from the CashApp into his linked Educators Credit Union banking account.

The data acquired from the analysis of the iPhone included but was not limited to, call logs, contacts, SMS messages, MMS messages, images, and video files. I reviewed the data that was extracted from Christian's phone. There were several pieces of information pertinent to the investigation of illegal narcotic sales.

I observed a message thread between Christian and a contact referred to as "My Love". This contact had a phone number of 618-204-2391 which is the phone number Christian earlier provided for Alyssa. The "My Love" contact identifies "My Love" as being Alyssa. The earliest messages originate on 02-20-22. "My Love" sent several images to Christian that are pictures of Alyssa. Furthermore, in-house records indicate that this phone number belongs to Alyssa from a medical call on 04-19-21. It is clear that Alyssa is both buying and

selling drugs and Christian is providing drugs based on the messages between them. The following are examples (A = Alyssa / C = Christian):

03-21-22

A: "Also my plug got locked up :)" ("Plug" is slang for a known drug dealer)

C: "Oh damn he got caught up?"

A: "Yuh"

C: "Yea"

A: "I texted manny asking"

C: "I think I told you it was gonna happen soon when I met you"

C: "Lol"

A: "He's tryna get a hold of his brother for me cause he does his serves sometimes" ("serves" is slang for dealing drugs)

A: "How did you know lol"

C: "There's just almost no way to be moving that much, be that cocky and not get caught up"

A: "You right"

C: "You needa cut that cash app shit out alyssa"

A: "Venmo sir and I get paid both"

A: "I'm otw" ("otw" = on the way. They had previously discussed meeting up)

C: "Kay just know I already told you"

A: "Whatever Christian"

03-26-22

Christian and Alyssa are in an argument which Alyssa blames on her doing ketamine "5-6 times in one night" and that she "didn't wanna do more after the first bump".

04-11-22

A: "I'm gonna pick up carts so you'll get them for the low just lmk how many you want cause I'm picking up extra for you" ("carts" is slang for the vape cartridges which is what was found during the executed search warrant of the residence).

04-12-22

Alyssa sent Christian her Venmo account information (@Alyssa-Jurasik)

A: "You still want me to mail the edibles?"

C: "Ok good"

C: "And yea ofc!"

Alyssa eventually asks Christian what last name she should put on the package that she is sending him. Alyssa then sends a picture of the mailed receipt with tracking information.

04-15-22

A: "A kid at Carthage OD last night and it was one of my customers im doing great"

C: "And oh no, what did he od on"

C: "What was their name?"

A: "Josh"

C: "I didn't know him"

C: "Are you ok?"

A: "Josh Atlas" (I checked this name in-house and found a medical call involving Joshua Atlas at Carthage on 04-15-22. According to the medical examiner, the death was ruled to be caused by acute myocarditis).

A: "The amount of drugs I've did should have killed me but like it killed my friend instead I just don't understand why it happens"

05-11-22

Based on messages between Alyssa and Christian it would appear that Christian was flying back to Wisconsin/Illinois.

A: "Baby they got a drug dog in here"

C: "Why even"

A: "In the middle of the square sniffing people who walk past"

C: "That's so gay"

A: "Don't bring the cart"

05-13-22

There are several messages regarding payment potentially for drugs.

A: "Did jc pay you in cash"

A: "Also how much did lalo charge last time for wax" (THC wax)

C: "Yes, 100"

C: "And 600, why?"

A: "3 jars for 460"

06-03-22

A: "Lmk when you're awake babe one of my customers is wants to come pick up 4gs of the runt" ("runt" is a common marijuana strain and "4gs" is most likely 4 grams).

After a few more messages Christian stated, "But you can def send me 80 to complete the 100 from the serve"

06-07-22

A: "I'm giving this girl who wants bud you dnap [snap] cause I ain't got time to deal w her lol" ("bud" is slang for marijuana).

A: "She venmoed me your money btw"

06-09-22

Conversation between Christian and Alyssa about returning \$50 to a customer because she found mold on her marijuana.

A: "I got a diff customer who wants bud he was a solid g who gave me the answer in class"

A: "He wants to know prices"

A: "How much for a quad" ("Quad" is slang for about 7 grams of marijuana or just over)

C: "60"

A: "I got a girl who wants wax"

A: "How much for eighth" ("Eighth" is slang for approximately 3.4 grams of marijuana)

A: "8th"

C: "Of wax? 100"

C: "For 8th"

C: "8th of bud is 30 quarter is 50-60"

A: "Yes wax"

C: "Ok bet"

C: "Yea"

C: "This a new person?"

A: "Na one of my regulars"

C: "Bet give her my snap"

06-10-22

A: "Can you drop three carts off @ 10am at kyles"

06-17-22

A: "I got a girl who wants bud"

A: "How much for an eighth"

C: "And 30/35"

06-21-22

A: "Babe do you have more edibles"

A: "Someone's asking"

C: "I do"

A: "How much are the edibles"

C: "15 for 1-3, 10\$ for 4 or more"

C: "Nvm it'a just \$15"

C: "Cuz they super strong"

A: "One of my sorority sisters wants two to pick up tmrw baby"

C: "Ok bet 30\$"

06-22-22

A: "Hey babe can you serve my friend two edibles"

C: "Is they outside"

A: "She's coming"

C: "ok"

C: "M&m or cookies n cream"

A: "One of each"

A: "She venmoed me already"

C: "Ok"

A: "I'll withdrawal it for you"

A: "No its ok you can just Venmo it to me honey"

06-27-22

A: "How much for an O of weed"

A: "Alex wants an O" ("O" is slang for an ounce of weed)

C: "Who"

A: "Step dad"

C: "Oh"

C: "Shoot I'm out till Friday"

C: "160"

06-28-22

Alyssa sent Christian a picture of what appears to be THC dabs – a marijuana concentrate – weighed on a digital scale that is giving a reported value of 2.1 grams.

06-29-22

A: "Baby do you have bud my sister wants some"

C: "None baby"

A: "Damn it"

C: "ik ik"

A: "I would've had a serve for you"

C: "I need to drop 2k on that"

A: "Yeah you do"

A: "I can do your serves while your gone they'll just have to come get them"

A: "It's not like I'm not a professional"

07-02-22

A: "Brandon wants an 8th is that cool"

07-05-22

Alyssa sent a phone screenshot to Christian of a SnapChat conversation that she had with a "Kyle Rover". The conversation goes as follows (K = Kyle Rover)

A: "Yeah Ima go to the gym by my house instead so can you just meet me over here"

K: "I'll jus link tomorrow or Thursday the."

A: "You making money. K Lol go be a bitch to someone else. What happened to being a drug dealer lol delivers mail Lol Fuck outta here with that shit"

K: "I do its just you're the furthest person for me Excus me you want to talk to my like that? Alright cool"

Alyssa later tells Christian that the fight between her and Kyle was because she didn't want to bring vape carts to Kyle's place.

07-06-22

After an argument over messaging, Christian tells Alyssa that he doesn't want her "serving anymore" to which Alyssa responds "Okay then I won't be. I'm gonna need to get rid of the rest of my carts tho unless you wanna handle that".

07-07-22

A: "7g in the top drawer"

A: "2g in 2nd drawer"

07-14-22

A: "I got carts and addy packed for you too" ("addy" is slang for Adderall)

08-02-22

A: "Alex wants a half" ("half" is slang for a half ounce of marijuana)

C: "You can show him the option when you come home"

08-04-22

A: "How much is an eighth"

C: "Of?"

A: "Bud"

C: "45"

08-05-22

A: "You pick me up 6 carts and 1oz of shake and David pick me up 8 carts and 1oz of shake. And then go to the other dispo down the street and you each pick me up 1oz of the \$100oz" ("shake" is marijuana bud that has been broken down through handling often referred to as scraps).

08-09-22

Alyssa sent a SnapChat screenshot of an address in Tennessee advising Christian to mail out a package.

A: "When is our stuff from Cali coming"

A: "Have you mailed yet"

A: "I need those carts mailed by today"

In a later conversation Alyssa stresses to Christian that the package needs to be mailed out today.

[Postal Inspector E. Meidlinger confirmed that a package was mailed out with the return sender being "Alyssa J" from 1935 Sheridan Road. Furthermore, Inspector E. Meidlinger advised that this same address in Tennessee received two prior packages from 1935 Sheridan Road on July 1st and July 23rd. Inspector E. Meidlinger advised that the parcels were consistent with drug parcels and the weights were most likely user amounts.]

A: "Stop being dumb I asked my sister for the money so I could send her her carts"

Christian eventually responded with a picture of a mailing receipt and then advises "going on a serve honey I'll be back"

08-11-22

A: "Did Courtney venmo you"

C: "No"

A: "What"

A: "She didn't pay you?"

C: "Not yet"

A: "Okay well if she pays you today I have another customer who's buying carts and I could get another box today so"

A: "She needs to pay you lol"

08-13-22 through 08-15-22

Alyssa asks Christian several times about where the package is, most likely the one that was intercepted by Postal Inspector Erik Meidlinger. Christian tells Alyssa "forget about the package honey it's a lost cause" and "It registered as coming in but never came in which means someone took it".

08-17-22

The day of the controlled delivery and execution of the search warrant Christian sends Alyssa a message stating "I GOT THE PACKAGE".

I found several SnapChat messages between Christian and the account "Evil Cunt". "Evil Cunt" was written on one of the upstairs doors at Christian and Alyssa's residence. The Emoji icon for the account is similar to Alyssa and the content of the conversations is similar to the ones Christian has with Alyssa via text message. In one of the messages "Evil Cunt" says that she was "talking to Bonnie" who is the landlord of their residence. I later observed two contacts in Christian's phone labeled "Evil Cunt". The "Evil Cunt" contacts contained further identifying information tying this SnapChat account to Alyssa such as her phone number used with this account and the name "Alyssalilyanne". The messages are as follows (C = Christian / E = Evil Cunt):

C: "60

Wym got another

100 for an 8th

90 is my absolute lowest

Yea for 4 I can do 105

You know what if they get 4gs rn I'll do it for 100"

C: "Honey can you leave 2gs of wax at the door pla By6:30"

C: "Oh my love

Can you put 2gs in the top cabinet outside honey" (Based on the content of several messages it would appear that Alyssa and Christian were dealing marijuana by leaving it in a cabinet outside their front door for customers to come and pick up).

C: "Yes you get to marry me

I have the privilege to marry you" (This would be a further indication that "Evil Cunt" is Alyssa).

C: "Can you put 7gs I the top drawer when you get home pls"

E: "Hmmm ok"

C: "Baby can you put 2gs in the top drawer"

C: "Can you leave two 3.5's in the top drawer when you have a chance honey

Also there will be 100\$ in the drawer for you to take (its from a different serve not for the two 3.5's you're going to put)

If the 100\$ is not there he hasn't dropped it off yet"

I observed several other messages that indicated Christian was dealing drugs as well as several images of narcotics. Furthermore, beyond selling and using drugs, Alyssa brags several times about stealing items from local retail stores.

On 09-15-22 at approximately 9:20 AM I attempted to make contact with Alyssa via the cellular phone number that was used with the above text thread. The phone rang until it eventually went to a voicemail for "Alyssa".

On 09-16-22 at approximately 2:13 PM, I made contact with Alyssa via the same cellular phone number that took part in the text conversations above. Alyssa advised that she did not want to answer any questions or provide any further information. Alyssa refused to meet with me.

On 10-17-22 I completed a search warrant for Alyssa's SnapChat account under the name "alyssalilyanne". The warrant was signed by Kenosha County Circuit Court Judge Jodi Meier at 9:39 AM. I submitted the warrant via SnapChat's law enforcement service system website. I received information and data back from SnapChat in reference to Alyssa's account "alyssalilyanne". I reviewed the data which appeared to be primarily pictures, videos, and some excel files. Most of the included pictures were of Alyssa and some of them included Christian.

Some of the images contained screenshots of text conversations. I observed one of these conversations between Alyssa and someone named LaLo:

Alyssa: "Yo you got the video of the wax? You running them \$150 for 3 or more still?"

Lalo: "Yeah I'll send video when I get home quality af Yeah 3/150 they 28 grams in jar each gram starts @ \$35"

Alyssa: "Bet, I got someone who was prolly wanting 3 I was gonna pick up for him tho"

Lalo then proceeds to send images of "Pops" brand wax in jars. These jars and brand are the same type of wax that was located at Alyssa's residence during the execution of the search warrant.

Lalo: "I have all 3 types of wax crumble I forgot the names I just know crumble is that crumble looking I forgot what they call that wet one and the dry one I got all 3 types Pops too quality ass brand Shatter crumble oil all 3"

I located another image that was labeled "barthage criminals" posted by "Lyssss" that appeared to be marijuana vape cartridges with the text "Last few 1-30 2-55 lmk". This would appear to be Alyssa selling THC vape cartridges (one for \$30 or two for \$55). Another image posted by "Lyssss" on barthage criminals showed more THC vape cartridges with a menu text reading "1-40", "2-75", and "3-105".

I located several recorded short videos within the SnapChat records. These videos included Alyssa smoking vaporizers and inhaling nitrous oxide through whip-its, several pounds of bud marijuana being showcased by an unknown male, and Alyssa doing marijuana dabs with another female named "Dakota".

It should be noted that 1935 Sheridan Road is within 1000 feet of Petretti Park (1903 16th Avenue), Carthage College (2001 Alford Park Drive), and Alford Park (1819 Sheridan Road)."

KSD Detective Scott Becker reports that he was present for the above-mentioned August 17, 2022, search warrant and he was designated to conduct the search of the residence and collect all evidence. Det. Becker reports the following:

"I started my search in the upper northeast bedroom where I observed the delivered package. During the search of the northeast bedroom, 499.55 grams of THC products were located. As well as various drug paraphernalia and two white capsule shaped pills with the words Alza 36 on them in a blue packaging. A search on www.drugs.com showed Alza 36 is Methylphenidate Hydrochloride." [A review of www.drugs.com and the DEA's alphabetical list of controlled substances by your complainant re: Alza 36 reveals that the drug is a Schedule II Controlled Substance - Narcotic.]

"I assisted with the search of the remained of the residence. In the northwest bedroom the above-mentioned handgun was located in a night stand along the right side of the bed. The handgun was loaded with a magazine containing 7 9mm rounds.

In the southeast bedroom 52.1 grams of various THC products and drug paraphernalia.

In the remainder of the house 9.1 grams were located of various THC products and drug paraphernalia.

A total of 560.75 grams of THC was seized and collected as evidence. I took custody of the seized evidence and transported it to the Kenosha Public Safety Building for processing.

On December 27th, 2022, I responded to the Evidence Bureau located at the Kenosha Public Safety Building. I signed out evidence items #1 and #6 to conduct a NARK II test on suspected marijuana that was seized during the above-mentioned search warrant.

I opened evidence item #1 that was described as 156.35 grams of various THC products. Inside the evidence item #1 was various Marijuana dispensary packages. The items had labels on them describing the contents and a seal label indicating the package was not opened. I removed a glass jar labeled Black Bear Farms, 3.5 grams, "Glazed Apricot Gelato", 27% THC. I removed a sample of the green leafy substance and conducted a NARK II test #5 on the sample. The results of the test showed a presumptive positive for Marijuana/THC. The jar was placed back into evidence item #1 and resealed.

I opened evidence item #6 that was described as 27.5 grams of THC in 8 packages. Inside evidence item #6 was Marijuana dispensary plastic bag packages. The items had labels on them describing the contents and the package was heat sealed indicating the package was not opened. I removed a package labeled 24HRS OG, 3.5 grams THC. I opened the plastic bag and removed a sample of the green leafy substance and conducted a NARK II test #5 on the sample. The results of the test showed a presumptive positive for Marijuana/THC. The plastic bag was placed back into evidence item #6 and resealed."

Your complainant is an attorney with the Kenosha County District Attorney's Office, who bases her knowledge of this complaint on:

- The official law enforcement agency reports of the Kenosha County Sheriff's Department prepared by Detectives Joshua Schreiner and Scott Becker, whose reports were prepared in the normal course of law enforcement duties;
- Statements by citizen informant(s) USPS Inspector E. Meidlinger, USPA Inspector J. Tomas; who are eyewitnesses to the facts they relate;
- Statements by the defendants, which were made contrary to their penal interests;
- The official records of: The Circuit Court for Kenosha County; The Department of Transportation; The FBI Triple I Teletype; The Wisconsin Circuit Court Automated Program, which records are maintained in the normal course of business duties.

Subscribed and sworn to before me on 02/23/23

Electronically Signed By:

Emily K. Gaertner

Assistant District Attorney

State Bar #: 1117661

Electronically Signed By:

Rosamaria I. Delgado

Complainant

