

FILED
01-09-2026
Clerk of Circuit Court
Outagamie County
2026CF000029

STATE OF WISCONSIN	CIRCUIT COURT	OUTAGAMIE COUNTY
STATE OF WISCONSIN	DA Case No.: 2026OU000076	
Plaintiff,	Assigned DA/ADA: Nicholas P. Grode	
	Agency Case No.: A25051262	
vs.	Court Case No.:	
	ATN:	
CRISTIAN NMI MORALES		CRIMINAL COMPLAINT
1118 E. Frances Street		
Appleton, WI 54911		
DOB: 06/18/1994		
Sex/Race: M/U		
Eye Color: Hazel		
Hair Color: Black		
Height: 6 ft 2 in		
Weight: lbs		
Alias:		
Defendant.		
		<i>For Official Use</i>

The undersigned, being first duly sworn, states that:

Count 1: MISCONDUCT IN PUBLIC OFFICE

The above-named defendant on or about Thursday, October 9, 2025, Outagamie County, Wisconsin, as a public officer or public employee, in the officer's or employee's capacity as such officer or employee, did an act which the officer or employee knows is in excess of the officer's or employee's lawful authority or which the officer or employee knows the officer or employee is forbidden by law to do in the officer's or employee's official capacity., contrary to sec. 946.12(2), 939.50(3)(i), 973.046(1r), 973.047(1f) 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 furthermore, invoking the provisions of Wisconsin Statute 973.046(1r), if the court imposes a sentence or places a person on probation, the court shall impose a deoxyribonucleic acid analysis surcharge, calculated as follows: (a) For each conviction for a felony, \$250 (b) For each conviction for a misdemeanor, \$200.

And furthermore, invoking the provisions of Wisconsin Statute 973.047(1f), if the court imposes a sentence or places a person on probation, the court shall require the person to provide a biological specimen to the state crime laboratories for deoxyribonucleic acid analysis. The court shall inform the person that he may request expungement under s. 165.77 (4).

PROBABLE CAUSE:

AND PRAYS SAID DEFENDANT BE DEALT WITH ACCORDING TO LAW; AND THAT THE BASIS FOR THE COMPLAINANT'S CHARGE OF SUCH OFFENSE IS AS FOLLOWS:

Complainant is a sworn law enforcement officer and bases this Complaint upon the investigation of the officers named below, who are presumed truthful and reliable as sworn law enforcement official.

Complainant states that Officer Schmitz of the Appleton Police Department (APD) reports that on multiple occasions he spoke to VICTIM 1 regarding her relationship with her ex-boyfriend, Cristian Morales, and in part, her concerns that the Flock System had been inappropriately utilized in October 2025 to determine if her vehicle was where she told Cristian she would be.

Officer Schmitz reports he subsequently reviewed information he received via a search warrant from Flock Safety via Kodex. The documents and data received included Wisconsin Registration of VICTIM 1's two vehicles, search inquiries by Cristian Morales, a log from Menasha Police Department regarding a search inquiry for VICTIM 1's vehicle, and general data for Cristian Morales's Flock Safety Account.

Officer Schmitz reports upon review of the data received, he observed that Cristian Morales' Flock account was created on 3-10-2025 as part of his employment as a Menasha Police Officer with the email address associated with his employment. Officer Schmitz observed that Cristian made seven search inquiries from the date range of 10-7-2025 through 10-14-2025. Five out of the seven inquiries were for VICTIM 1's vehicle(s). Two of those inquiries were for Cristian's brother's vehicle.

Officer Schmitz observed VICTIM 1's BMW [PLATE REDACTED] was searched by account user Cristian Morales on October 9th, 2025, at 0952 hours, 0952 hours again, and 0954 hours. The 'Search Type' was reflected as "lookup", and the "reason" was reflected as "Welfare". No case number for the inquiry was entered. The data indicated that during each of the three searches, Cristian's name and external ID was documented. It also included that different Flock networks were searched, with camera counts ranging from 15,234 cameras to 92,702 cameras. With such a wide scope, Officer Schmitz had reason to believe statewide to even nationwide cameras were searched just based on Off. Schmitz' knowledge.

VICTIM 1's Chevrolet [PLATE REDACTED] was also searched by account user Cristian Morales on October 9th, 2025, at 0913 hours and 0917 hours. The 'Search Type' was reflected as "lookup", and the "reason" was reflected as "Welfare". No case number for the inquiry was entered. The data indicated that during each of the searches, Christian's name & external ID was documented. Officer Schmitz reports the camera count for those two searches were 15,233 & 15,234, which would indicate a large scope of search.

Officer Schmitz reports he subsequently spoke with Cristian Morales, at which time they discussed Cristian's Flock usage on October 9, 2025. When asked, Cristian indicated he was not on duty as a police officer when he utilized Flock to search for VICTIM 1's vehicle. Officer Schmitz reports he asked Cristian if at the time he used Flock in October, whether he used his personal phone, while at his house, which Officer Schmitz knows to be in the City of Appleton, Outagamie County, Wisconsin, at which time, Cristian shook his head up and down, as he indicated he did.

Cristian indicated that "desperation, and bad judgment, combined with a lack of sleep", contributed to his decision to use Flock. He also indicated he knew his decision to use Flock was wrong, but it was out of a pure moment of "desperation and lack of judgment".

Complainant states on October 9, 2025 Cristian Morales was employed as a sworn law enforcement officer for the City of Menasha Police Department and had access to the Flock camera system because of his employment as an officer.

Complainant states he is a sworn law enforcement officer and based on his training and experience he is aware that the Flock camera system, developed by Flock Safety, is an automated license plate recognition (ALPR) technology through a network of security cameras that utilize advanced technology to capture and analyze vehicle license plates, and designed to assist law enforcement agencies.

Subscribed and sworn to before me on 01/09/26

Electronically Signed By:

Melinda Tempelis

District Attorney

State Bar #: 1032157

Electronically Signed By:

Daniel Running

Complainant