

STATE OF WISCONSIN CIRCUIT COURT COUNTY OF MARATHON

STATE OF WISCONSIN

Plaintiff,

DA Case No: 2009MA005144

Court Case No:
[Defendant's ATN]

-vs-

Tyler Morris
429 Moreland Avenue
Schofield, WI 54476
DOB: 07/06/1986

Defendant,

Criminal Complaint

STATE OF WISCONSIN)
)SS
COUNTY OF MARATHON)

Complainant, on information and belief, being first duly sworn on oath states that:

Count 1: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on or about Monday, November 16, 2009, in the City of Schofield, Marathon County, Wisconsin, did, having attained the age of 18, knowingly possess motion picture(s) of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years. The Court may impose a sentence less than three years or place the person on probation upon a finding on the record that the Court finds the lesser sentence is in the best interests of the community and the public will not be harmed.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

Count 2: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on or about Monday, November 16, 2009, in the City of Schofield, Marathon County, Wisconsin, did, having attained the age of 18, knowingly possess motion picture(s) of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and

11/17/2009



(3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years. The Court may impose a sentence less than three years or place the person on probation upon a finding on the record that the Court finds the lesser sentence is in the best interests of the community and the public will not be harmed.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

Count 3: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on or about Monday, November 16, 2009, in the City of Schofield, Marathon County, Wisconsin, did, having attained the age of 18, knowingly possess motion picture(s) of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years. The Court may impose a sentence less than three years or place the person on probation upon a finding on the record that the Court finds the lesser sentence is in the best interests of the community and the public will not be harmed.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

Count 4: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on or about Monday, November 16, 2009, in the City of Schofield, Marathon County, Wisconsin, did, having attained the age of 18, knowingly possess motion picture(s) of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years. The Court may impose a sentence less than three years or place the person on probation upon a finding on the record that the Court finds the lesser sentence is in the best interests of the community and the public will not be harmed.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

Count 5: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on or about Monday, November 16, 2009, in the City of Schofield, Marathon County, Wisconsin, did, having attained the age of 18, knowingly possess motion picture(s) of a child engaging in sexually explicit conduct, and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years. The Court may impose a sentence less than three years or place the person on probation upon a finding on the record that the Court finds the lesser sentence is in the best interests of the community and the public will not be harmed.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

Complainant is a law enforcement officer in Marathon County and bases this complaint upon the attached law enforcement reports which your complainant believes are reliable in that they are made by the officer in the routine and ordinary course of the officer's official duties.

Your complainant believes the statements contained within said reports are reliable for the following reasons: They are made by Special Agent Loreen Glaman, as a witness to criminal activity, insofar as it is based upon personal observations and knowledge. They are made by the defendant contrary to penal interests.

and prays that the defendant be dealt with according to law.

Subscribed and sworn to before me,
and approved for filing on this:
November 17, 2009.

Complainant

District Attorney
State Bar No. 1012556
Marathon County, Wisconsin

11/17/2009

On Monday, 11/16/2009, at approximately 11:20 a.m., Special Agents with the WI Department of Justice (DCI), Division of Criminal Investigation, assisted by personnel with the Everest Metro Police Department, conducted a search warrant at 429 Moreland Ave., Schofield, Marathon County, WI 54476, the residence of Tyler H. Morris, DOB: 7/6/1986, for the Possession of Child Pornography. During the search, DCI Analyst Andrew Schoeneck conducted a preview search of two computer hard-drives; the first was located in the living room of the residence, and the second was located in the basement of the house, in Tyler Morris's bedroom.

On the computer hard-drive located in Morris's bedroom, Analyst Schoeneck previewed 14 videos and provided them to S/A Loreen C. Glaman on a DVD-R. He assigned them #1 through #14. On Tuesday, 11/17/2009, S/A Glaman examined the disc and observed file #1 and #2 to be incomplete versions of file #13. S/A Glaman observed that #4 and #7 appeared to be the same video with the same hash value, though were created on different dates. S/A Glaman observed #10 and #11 to be the same video with the same hash value, created the same date but seconds apart.

S/A Glaman observed the following six videos contained child pornography:

Video #3:

File path: 2\Documents and Settings\TY.TMAN\Incomplete\T-298296974-Pthc - Hc Pt3 Two little girls playing - Preteen sex with man - Indian Family Sex (22m44s).mpg

File Created: 10/23/07 12:09:52AM

Last Accessed: 07/30/09 12:11:57AM

Last Written: 10/23/07 04:14:42AM

Is Deleted: No

Hash Value: 149e2a645123b4815087528b34a09f95

This video is 22:44 in length. It begins with two little girls on a bed with a red spread. They are taking off each other's panties. One little girl has no breast development and no pubic hair, and is small in stature, consistent with an 8 - 10 year old. The other girl has some breast development and a small amount of pubic hair, consistent with a 10 - 12 year old. The girls rub each other's bodies, and touch each other's vaginas. The girls use a sexual device and rub it on each other's vaginas.

The scene changes and the two girls are in another room. They are wearing short dresses. They begin wrestling over a pornographic magazine. They fall onto a mattress on the floor with a yellow spread and begin to look at the magazine. They remove each other's panties and begin digitally touching each other's vaginas. They completely remove their clothing. One girl has no breast development and no pubic hair and is small in stature, consistent with a 8 - 10 year old. The other has some breast development and pubic hair, consistent with a 12 - 14 year old. The girls lick each other's vaginal areas. The younger girl uses a blue sex toy to masturbate her vagina, while the other one touches the younger one's torso, chest area and face. The younger girl then uses the blue sex toy on the older girl, and inserts into her vagina. The girls switch to a larger, cream colored sex toy, and the young girl vaginally penetrates the older one with the new toy. The older

one then rubs it on the younger girl's vagina. They again orally lick each other's vaginas. A third female enters and they move to a different room. The third female partially undresses so she is wearing only panties. She has full breast development. The little girl is placed on a counter, and one of the older females licks the little girl's vagina.

The remaining approximately 8 minutes consist of a group of four people, one adult male with three girls. Two of the girls have little/no breast development and no pubic hair, consistent with 9 – 11 year olds. The third girl has some breast development, some pubic hair, and some rounding of the hips, consistent with a 13 – 16 year old. The scenes vary for the remaining video from the adult male vaginally penetrating the girls with his penis, to the girl's orally stimulating the man's penis, to close ups of the girl's vaginas, to the girl's digitally stimulating each other's vaginas to the girls urinating on the cement.

Video #5:

File Path: 2\Documents and Settings\TY.TMAN\My Documents\LimeWire\Saved\Kids Teens Women (Porno-Lolitas-Preteens-Reelkiddymov-R@Ygold-Hussyfans-Underage-Girls-Children-Pedofilia-Pthc-Ptsc-Xxx-Sexy).mpg

File Created: 02/03/08 10:49:39PM

Last Accessed: 08/03/09 12:30:55AM

Last Written: 02/03/08 11:55:55PM

Is Deleted: No

Hash Value: 6ed2eb3b5395875e39b1e1344a8247f7

This video is 29:27 in length and is a compilation of many videos. It begins to a little girl standing on a bed and dancing. She is naked, has no breast development or pubic hair, and is small in stature, consistent with a 9 – 11 year old. The video changes shortly to a number of scenes depicting adult males with young girls. Most of the girls are all naked, have no breast development or pubic hair and are small in stature, consistent with 6 – 9 year olds. The scenes vary from adult males vaginally penetrating the little girls with their penises, to the little girl's touching themselves, to the little girl's sucking on the male's penises, and the males ejaculating on the little girls.

Approximately five minutes into the video, there is about 1 minutes worth of adult men ejaculating into the faces of adult females.

The scene changes again, to numerous 5 – 45 second scenes of little girl's with adult males. The little girl's are mostly naked and the males are vaginally penetrating them orally and digitally. In one scene a man is ejaculating on a little girl's face as the little girl screams, "No!" The next scene starts with the title "6 year old masturbates" and shows a little girl rubbing her fingers on her naked vagina as the camera zooms in close to her vaginal area.

There are several different scenes of naked pre-pubescent girls dancing in a sexual manner. The girls have no breast development and no pubic hair, consistent with a 10 – 12 year old.

The scene then changes to an adult male vaginally penetrating a little girl with his penis. The little girl is small in stature and has no pubic hair. This features extreme close-ups of the vaginally penetration and appears to be lit with a flashlight or other light.

This video continues showing many scenes with many different children and adults engaged in behaviors similar to the above.

Video #6:

File Path: 2\D\Documents and Settings\TY.TMAN\My Documents\LimeWire\Saved\PJK 12yo boy fucks 12 yo girl kiddie pedo boy lolita R@ygold underage.mpg
File Created: 02/12/08 10:52:57AM
Last Accessed: 08/03/09 12:30:55AM
Last Written: 02/12/08 11:13:21AM
Is Deleted: No
Hash Value: 2e24f5b63dbc9fe57e5fa6a803849fd9

This is a video of a boy and girl engaged in vaginal/penile sexual intercourse. Neither child has any pubic hair, and the girl has no breast development. Both are small in stature, consistent with 10 – 12 year olds. The video is approximately three minutes long, and is primarily a close-up of the sexual intercourse.

Video #8:

File Path: 2\D\Documents and Settings\TY.TMAN\My Documents\LimeWire\Saved\Two 13 Yr. Old LittleGirls Gets Cum In Face... kiddie child ddoggrn lolita in(illegal_preteen_underage_lolita_kiddy_child_incest_xxx_porno_gay_fuck_young_naked_nude_little_gir.mpg
File Created: 05/27/08 06:31:51PM
Last Accessed: 08/03/09 12:30:55AM
Last Written: 05/27/08 07:43:59PM
Is Deleted: No
Hash Value: f1a25462c05b28581e4670bd7422d312

This video file is approximately 45 seconds long and depicts two (2) nude females kissing one another while an adult male masturbates and fondles both female's breasts. The male ejaculates on the faces of both females. One of the females appears to be 11-12 years of age and exhibits only minimal breast development. She is also very small in stature and her face is roundish and large in relation to her body, consistent with what would be typically seen in a child's face. The older of the two girls appears to be approximately 13-15 years of age and does exhibit breast development.

Video #10:

File Path: 2\D\Documents and Settings\TY.TMAN\My Documents\LimeWire\Saved\MafiaSex.
Ru_Children_Kids_Hard_000003_Copy_01_16yo_Gets_Raped_Hymen_Visibly_Penetrated_Kiddy_Little_Girl_Young_Kiddypom_Real_Child_Sex_Baby.mpg
File Created: 05/27/08 09:42:19PM
Last Accessed: 08/25/09 01:14:55AM
Last Written: 06/02/08 06:09:28PM
Is Deleted: No
Hash Value: d7b8a4a830b9374f717507db97638b13

This video is 1:41 in length and shows an adult male vaginally penetrating a prepubescent female with his penis. The video features extreme close-ups of the girl's vagina and appears to be lit with a flash light.

Video #13

File Path: 2\D\Documents and Settings\TY.TMAN\Shared\12 year old having hard sex reelkiddymov ddoggprn child kid porn fuck kiddie.mpeg
File Created: 03/23/06 09:01:08PM
Last Accessed: 07/30/09 12:12:02AM
Last Written: 03/23/06 09:13:31PM
Is Deleted: No
Hash Value: ecf33f48909cec8788d07acb01cba3ff

This video is 1 minute in length and shows a girl and male engaged in sexual intercourse on a bed. The male is penetrating the girl vaginally with his penis. The girl has no pubic hair and no breast development, consistent with an 11 - 12 year old. The girl is initially laying on her belly on the bed and the male is on top of her. The camera zooms in to the girl's buttocks and shows a close-up of her vagina. The next scene is of the male lying on the bed and the girl crouched on top of him, with his penis in her vagina.

On Monday, 11/16/2009, S/A Loreen C. Glaman and S/A Ronald W. Glaman interviewed Tyler Morris at his place of employment, the Lodge at Cedar Creek, in one of the guest bedrooms. Morris was not handcuffed and was told he was not under arrest. The following is a synopsis of portions of the interview:

Morris stated his bedroom is in the basement of 429 Moreland Ave., Schofield, WI, and he lives with his sister and brother-in-law. He has lived at this address since February 2009. Prior to living in Schofield, he resided in Eau Claire, WI. He moved to Eau Claire in 2005 and had a roommate for approximately 1.5 years. His roommate moved to Illinois in 2006/2007, and Morris then resided alone. He had a computer in Eau Claire in the living room of the apartment. He brought this computer to Schofield in 2009, though never had it hooked-up to the Internet while living in Schofield.

The computer in Morris's bedroom in Schofield is Morris's computer, the same computer he had in Eau Claire. Only he uses it since he moved to Schofield, though it hasn't worked correctly for the past four months or so. (Approximately August 2009.)

Morris stated he has viewed child pornography, and he has some files saved on his computer which contain child pornography. He stated he downloaded them via Limewire. He said he looks for adult pornography on Limewire, and sometimes gets child pornography. When he gets child pornography he sometimes tries to delete it, though has problems deleting the files as they seem to give his computer a virus. Because he sometimes has problems with deleting, he has not deleted all of the child pornography he downloads. Morris stated he may have been curious about child pornography and looked for it once or twice in the past. Most of the child pornography he has downloaded has been when he is looking for adult pornography.

Approximately two months ago, Morris used the computer in the living room of his sister and brother-in-laws house. His sister and brother-in-law were out of town. He downloaded a new version of Limewire, and looked for adult pornography. He thought he had also received one file containing child pornography.

Morris estimated he has 5 child pornography videos saved on his personal computer, which he last viewed approximately four months ago, before he had computer problems. Morris thinks he may have downloaded one child pornography video on the family computer in the living room about two months ago.

YOU HAVE THE RIGHT TO AN ATTORNEY

You have been charged with a crime.
If you are convicted of the charge, you may go to jail or prison.

**YOU HAVE THE RIGHT TO HAVE AN ATTORNEY WITH YOU
DURING ANY AND ALL COURT PROCEEDINGS.**

If you cannot afford an attorney, one will be appointed for you.

If you would like an attorney appointed for you, you must go to the
State Public Defender's Office.

IMMEDIATELY.

THE SOONER YOU GO TO THE PUBLIC DEFENDER'S OFFICE,
THE SOONER AN ATTORNEY CAN BE APPOINTED FOR YOU.

THE COURT WILL NOT DELAY YOUR CASE SIMPLY BECAUSE
YOU HAVE FAILED TO SEEK THE APPOINTMENT OF AN ATTORNEY.

**State Public Defender
370 Grand Avenue
Wausau, WI 54403
(715)842-1603**

**Two blocks South of Courthouse,
across the street from St. Mary's Church,
behind the Job Center.**

**Intake Hours: Monday - Friday
8:00 a.m. - 11:00 a.m. and 1:00 p.m. - 3:30 p.m.**

You must bring a copy of the criminal complaint with you.