

STATE OF WISCONSIN

CIRCUIT COURT
BRANCH _____

MARATHON COUNTY

STATE OF WISCONSIN,

Plaintiff,

v.

Case No. 10-CM-_____

RONALD J. MOORE,
635 South 4th Avenue,
Wausau, WI 54401,
DOB: 04/05/1955,

Defendant.

SUMMONS

THE STATE OF WISCONSIN TO SAID DEFENDANT:

The Complaint, a copy of which is attached, having been made before me accusing the defendant, Ronald J. Moore, of the crime of **attempted possession of a controlled substance-THC**, contrary to Wis. Stat. §§ 961.41(3g)(e), 961.14(4)(t), and 939.05(3) and **possession of drug paraphernalia**, contrary to Wis. Stat. § 961.563(1).

You, Ronald J. Moore, are therefore summoned to appear before the Honorable Greg Huber, Circuit Court Judge for the Marathon County Circuit Court, Branch 2, Marathon County Courthouse, 500 Forest Street, Wausau, Wisconsin, to answer said complaint on October 20, 2010, at 1:30 p.m. In case of your failure to appear, a warrant for your arrest will be issued.

Dated this 1st day of October, 2010.



DONALD V. LATORRACA

State Bar No. 1011251

Assistant Attorney General and

Special Prosecutor for Marathon County

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Defendant.

CRIMINAL COMPLAINT

Complainant, being duly sworn on oath, states as follows:

COUNT I: Possession of a Controlled Substance: THC

On or about February 4, 2010, at 635 South 4th Avenue, city of Wausau, Marathon County, state of Wisconsin, as a party to a crime, the above-named defendant did attempt to possess a controlled substance (tetrahydrocannabinols, the active ingredient in marijuana), specifically, the defendant did counsel and procure A.E.P. to obtain possession of marijuana, contrary to Wis. Stat. §§ 961.41(3g)(e), 961.14(4)(t), and 939.05(3).

Upon conviction of this offense, a misdemeanor, the maximum possible penalty is a term of imprisonment not to exceed six months, or a \$1000 fine, or both.

COUNT II: Possession of Drug Paraphernalia

On or about February 3, 2010, at 635 South 4th Avenue, city of Wausau, Marathon County, state of Wisconsin, the above-named defendant did possess with primary intent to use drug paraphernalia to ingest, inhale or otherwise introduce into the human body a controlled substance, contrary to Wis. Stat. § 961.563(1).

Upon conviction of this offense, a misdemeanor, the maximum possible penalty is a term of imprisonment not to exceed 30 days, or a \$500 fine, or both.

STATEMENT OF PROBABLE CAUSE

1. I am currently employed as an investigator for the Marathon County Sheriff's Department and am currently assigned to the Department's Special Investigations Unit (SIU). As part of these duties, I investigate controlled substance offenses in Marathon County. I have served as a law enforcement officer for the past 11 years. I know from my training and experience that tetrahydrocannabinols (THC) is a Schedule I controlled substance and that THC is the active ingredient in marijuana.

2. I base this complaint upon information and belief, including the statements of several adult citizens, as well as the investigation conducted by myself and other members of the Marathon County Sheriff's Department.

3. A.E.P., an adult citizen, informed me that his family retained the defendant to represent him on criminal cases pending in Marathon County Circuit Court. A.E.P. stated that on February 3, 2010, the defendant contacted him and told him that Marathon County SIU would be raiding his house. The defendant directed A.E.P. to gather all drug-related items in his house. A.E.P. stated that he placed several items including homemade pipes used for ingesting marijuana, a digital scale, and empty bags and placed them in a garbage bag. A.E.P. then

provided the bag to the defendant at the defendant's office at 635 South 4th Avenue, city of Wausau, Marathon County, Wisconsin. While at the office, the defendant asked A.E.P. about the going price for an ounce of marijuana. A.E.P. stated that the defendant had informed A.E.P. that the district attorney had told the defendant that there was a warrant to raid the house and that is why A.E.P. believed that the defendant wanted him to bring the previously described items to the defendant's office.

4. A.E.P. subsequently informed me that on February 4, 2010, the defendant telephoned A.E.P. and asked him to come to his office. After discussing pending cases, A.E.P. states that the defendant directed him to pick up an envelope. It contained \$400 in \$20 bills. The defendant told A.E.P. to purchase an ounce of marijuana. According to A.E.P., the defendant called A.E.P.'s employer and told the employer that A.E.P. would not be in for work as the defendant had something for him to do. Upon leaving the defendant's office, A.E.P. contacted another individual for the purpose of purchasing marijuana. Prior to obtaining any marijuana, A.E.P. spoke to his parents who subsequently directed A.E.P. to meet them at the defendant's office. According to A.E.P.'s father, R.E.P., the defendant stated that A.E.P. would be making a good faith buy of marijuana in an effort to assist A.E.P. in resolving his pending criminal charges in a more favorable manor.

5. I know from my training and experience, that officers will often have a potential informant make a "good faith" purchase of a controlled substance for the purpose of ascertaining their credibility as well as their ability to assist law enforcement with future investigations. "Good faith" purchases are only conducted under the direction of law enforcement officers. No arrangements had ever been made between the SIU and the defendant and A.E.P. to cooperate as an informant.

6. I also spoke to Marathon County Assistant District Attorney Lance Leonhard who informed me that he was responsible for prosecuting A.E.P.'s cases. ADA Leonhard stated that the defendant contacted him about cooperating with law enforcement in exchange for consideration on his pending cases. ADA Leonhard advised the defendant that it was inappropriate to have A.E.P. cooperate in this case because of the nature of his pending cases.

7. I have spoken to the defendant regarding the above allegations, and he denies them.

Dated this 29th day of September, 2010.



INVESTIGATOR NATHAN PAULS
Special Investigations Unit
Marathon County Sheriff's Department

Subscribed and sworn to before me
and approved for filing this 29th
day of September, 2010.



DONALD V. LATORRACA
Assistant Attorney General and
Special Prosecutor for Marathon County
State Bar No. 1011251

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