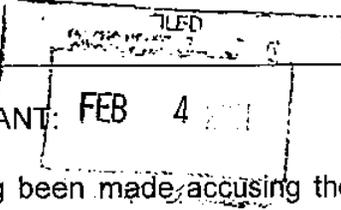


**CASE ASSIGNED TO  
JUDGE BEER**

State of Wisconsin	Circuit Court	Green County
STATE OF WISCONSIN Plaintiff, -VS- JAMES NORQUAY Defendant,	Court Case No.: 2011CF0000 16 	<b>SUMMONS</b>

THE STATE OF WISCONSIN TO SAID DEFENDANT:

A complaint, a copy of which is attached, having been made, accusing the defendant of committing the crime(s) of:

<u>THE CRIME OF:</u>	<u>DATE OF VIOLATION:</u>	<u>CONTRARY TO WIS. STATUTE:</u>
Sexual Assault of a Child	11/06/2008	948.02(2)
Sexual Assault of a Child	06/02/2009	948.085(2)
Placed in a Foster Home		
Incest	12/25/2009	948.06(1)

The original of such complaint has been filed in the office of the Clerk of Courts for Green County.

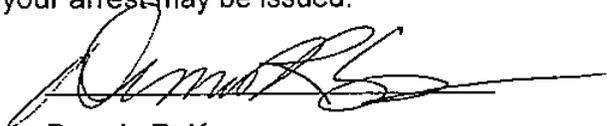
You, the defendant, are therefore summoned to appear before the Circuit Court – Criminal Division of Green County, at the Green County Justice Center at 2841 Sixth Street, Monroe, Wisconsin 53566 2nd Floor on:

DATE/TIME: 02/07/2011 at 1:15 PM

And in case of your failure to appear, a warrant for your arrest may be issued.

Date:

*February 4, 2011*



Dennis R. Krueger  
Assistant Attorney General  
State Bar No. 1009923  
Special Prosecutor for Green  
County  
Wisconsin Department of Justice  
17 West Main Street, P.O. Box 7857  
Madison WI 53707-7857  
(608) 261-8116

STATE OF WISCONSIN

CIRCUIT COURT

GREEN COUNTY

STATE OF WISCONSIN,

Plaintiff,

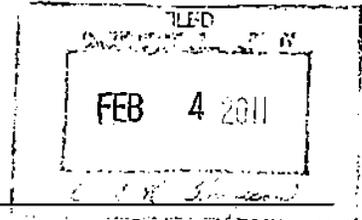
**CASE ASSIGNED TO  
JUDGE BEER**

v.

Case No. 11-CF- 16

JAMES NORQUAY,  
Race/Gender: W/M  
D.O.B. 02/10/1962

Defendant.



**CRIMINAL COMPLAINT**

**COUNT ONE**

Between November 6, 2008, and January 2, 2009, in the Town of Clarno, Green County, Wisconsin, the defendant did have sexual intercourse with a child who has not attained the age of sixteen, contrary to Wis. Stat. §§ 948.02(2) and 939.50(3)(c), and upon conviction of this offense, a Class C felony, the maximum possible penalty is a fine not to exceed \$100,000 or imprisonment not to exceed forty (40) years, or both.

**COUNT TWO**

On or about and between June 2, 2009, and June 29, 2009, in the Town of Clarno, Green County, Wisconsin, the defendant did have sexual intercourse with a child for whom the actor is a foster parent, contrary to Wis. Stat. §§ 948.085(2), and 939.50(3)(c), and upon conviction of this offense, a Class C felony, the maximum possible penalty is a fine not to exceed \$100,000 or imprisonment not to exceed forty (40) years, or both.

**COUNT THREE**

On or about December 25, 2009, in the Town of Clarno, Green County, Wisconsin, the defendant did have sexual intercourse with a child he knows is related by blood or adoption, to a degree of kinship closer than second cousin, contrary to Wis. Stat. §§ 948.06(1), and 939.50(3)(c), and upon conviction of this offense, a Class C felony, the maximum possible penalty is a fine not to exceed \$100,000 or imprisonment not to exceed forty (40) years, or both.

1. I am a Special Agent with the Wisconsin Department of Justice – Division of Criminal Investigation, and I base these statements upon the review of the police reports and investigation from Green County Sheriff's Department records G10-0049, my own information and belief derived from my investigation into this matter and my review of statements made by the adopted daughter of James Norquay during a forensic interview, relating to allegations that James Norquay, hereinafter referred to as Norquay, had sexual contact and intercourse with his adopted daughter, and on information provided to me by other law enforcement officers.

2. I was able to verify the age of Norquay's adopted daughter as 18 on the date this complaint was approved and filed. Norquay's adopted daughter will be referred to as "A" throughout the remainder of this complaint in order to afford her some degree of anonymity and to spare her shame and embarrassment as a result of these allegations being made public.

3. "A" stated that she was placed in the home of James Norquay, the defendant, and his wife Lori in November 6, 2008. Lafayette County Human Services records indicate that the first date of "A"'s placement in the Norquay home was on November 6, 2008. Lafayette County Human Services records also allege that "A" has been a past victim of sexual assault as a child and had made a false allegation of sexual assault against an adult male while under the supervision of Lafayette County Human Services.

4. "A" stated that soon after moving into the defendant's home that things got "weird" between the defendant and "A." "A" stated that the defendant frequently gave her rides to and from her church youth group meetings, to different appointments, and for other reasons, and that while in the defendant's truck, the defendant would engage her in different acts of sexual activity including oral sex, digital penetration and masturbation. "A" stated that the defendant had sexual intercourse with her on a number of occasions. "A" stated that the defendant made her feel guilty afterwards and said things to her including that if she told anyone it would tear apart their family, he would lose his job, and that he wanted a normal father/daughter relationship with her. "A" stated a little time

would go by and the defendant would reinitiate sexual activity with her only to again say that the activities he engaged in with her would be harmful to his family and employment. "A" stated that there was a lot of turmoil in the home partly because of her confused feelings for the defendant and that as a result she was taken out of the home on "respite" care, that she returned to the home after that and that the defendant resumed having sexual intercourse with her in the home at different locations until she was removed from the defendant's home on January 2, 2010.

5. "A" stated that soon after she began living in the defendant's home, the defendant asked to taste the lip gloss on her mouth and kissed her. "A" stated that as a result of this continued contact she and the defendant had sexual intercourse defined by "A" as penis to vagina intercourse. "A" stated that this first act of intercourse occurred at the defendant's residence in the Town of Clarno, Green County, Wisconsin. "A" stated that the defendant had intercourse with her sometime shortly before she went on a winter retreat with a church youth group. I was able to learn that this church youth group retreat occurred on January 2 through January 4, 2009. I was able to verify through Wisconsin Department of Motor Vehicle Driver Licensing Records that "A" became age 16 shortly after January 2, 2009.

6. "A" stated that there was at least one other act of penis to vagina intercourse that she engaged in with the defendant before she was removed from the defendant's home for respite care other than the first incident she described. "A" was removed from the defendant's home for respite care by Lafayette County Human Services on June 28, 2009, and returned to the defendant's home on July 12, 2009.

7. "A" stated that another incident occurred at home when Lori Norquay's mother had a birthday party. "A" stated that the defendant and she left the party in the defendant's truck alone together, that she was wearing a swimsuit and that while driving back to the defendant's home the defendant inserted his finger into her vagina. Lori Norquay indicated that she recalled the party and that the incident occurred around her mother Velma Moe's birthday. Lori stated that Velma lives a few miles away in Juda in Green County, Wisconsin. Wisconsin Department of Transportation Driver License records indicate that Velma Moe's birth date is June 29, 1929.

8. "A" stated that during the summer of 2009 the defendant took her to a wisdom tooth extraction appointment in the Milwaukee area. I have been able to determine that the date of this appointment in was August 24, 2009, by obtaining records from the provider who extracted "A"'s wisdom teeth and that the records indicate that the defendant signed the consent to treat. "A" stated that the defendant drove them to the appointment in his truck and while the defendant was driving he unzipped his pants and had "A" perform oral sex on the defendant. "A" stated that she was not sure where along the route to the appointment the sex act took place but stated that defendant drove the truck from the home in the Town of Clarno to the appointment in Milwaukee County.

9. "A" stated that there was an incident that occurred while Lori was visiting another family member in the state of Washington and she remained at the defendant's home. "A" stated that the defendant took a garden vegetable, specifically a cucumber or zucchini, and inserted it into her vagina. Lori stated that she took the trip to visit the family member between August 28, 2009, and September 1, 2009.

10. "A" stated that the defendant frequently sent her e-mails and that the defendant called her with his cell phone. "A" stated that one day in 2009 she called the defendant to pick her up at school with the excuse that she was sick. "A" stated that the defendant picked her up and took her home, that Lori was not present, and that the defendant had penis to vagina sexual intercourse with her. "A" stated that afterward she decided to bake cookies and that the defendant was helping her in the kitchen when Lori returned home. A review of cell phone records, school records, and the defendant's employment records which I gathered during the course of this investigation, when compared with the details provided by "A" during the assault, indicate that the probable date that this incident occurred was December 12, 2009.

11. "A" stated that she was adopted by the defendant and Lori Norquay on November 17, 2009. I reviewed Lafayette County Human Services records which confirm that "A" was adopted on November 17, 2009, by the defendant.

12. "A" stated that on Christmas Day in 2009, she was with the defendant in a shelter taking care of alpacas that the defendant raised. "A" stated that while in the

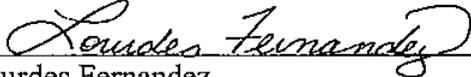
shelter, the defendant had her masturbate his penis and perform oral sex on him. "A" stated that the defendant ejaculated and that she wiped some of the defendant's semen on the coveralls she was wearing while she was with the defendant in the shelter.

13. Reports of Detective Terry Argue indicate that he executed a search warrant at the defendant's residence and retrieved a pair of black coveralls similar to the coveralls "A" described she was wearing while with the defendant on Christmas Day.

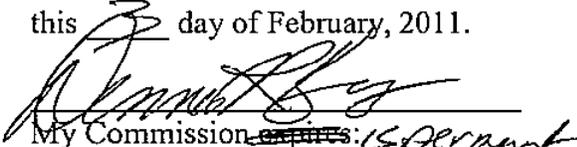
14. Argue also obtained a DNA sample from the defendant and submitted the defendant's DNA standard with the coveralls to the Crime Laboratory for analysis.

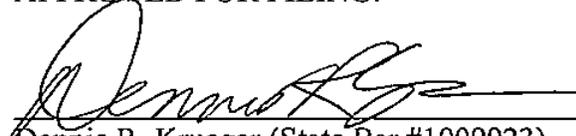
15. I have reviewed the Crime Lab report prepared by DNA analyst Denise Jones of the Wisconsin State Crime Laboratory, who I believe to be truthful and reliable. Jones indicates that as a result of her analysis she was able to determine that a male DNA profile was present on the coveralls and that the male DNA profile was identical to the defendant's.

Dated this 3 day of February, 2011

  
Lourdes Fernandez  
Special Agent - Wisconsin Dept. of Justice  
Division of Criminal Investigation

Subscribed and sworn to before me  
this 3 day of February, 2011.

  
My Commission expires: 12/31/2011  
APPROVED FOR FILING.

  
Dennis R. Krueger (State Bar #1009923)  
Assistant Attorney General  
Special Prosecutor for Green County  
Wisconsin Department of Justice  
17 West Main Street, Post Office Box 7857  
Madison, Wisconsin 53707-7857  
(608) 261-8116