

JS2
STATE OF WISCONSIN

CIRCUIT COURT
CRIMINAL COMPLAINT

DANE COUNTY

COPY

STATE OF WISCONSIN

Plaintiff,

DA Case No.: 2009DA010765

Agency Case No.: 09-3111

-VS-

ALEXANDER R COMBS

2734 Chamberlain Ave

Madison, WI 53705

DOB: 09/28/1986

Sex/Race: M/W

Eye Color: Blue

Hair Color: Blonde

Height: 6 ft 8 in

Weight: 185 lbs

Court Case No. 2009 CF

ATN: 13280907300456

Defendant,

COMPLAINING WITNESS

Jenniffer Price

The above-named complaining witness being first duly sworn states the following:

Count 1: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on or about Thursday, July 30, 2009, in the City of Madison, Dane County, Wisconsin, did, having attained the age of 18, knowingly possess a recording 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 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.

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.

FACTS: Your complainant is a special agent for the Wisconsin Department of Justice, Division of Criminal Investigation. On July 30, 2009, she contacted the defendant herein, who identified himself verbally, at his residence on Chamberlain Avenue in the City of Madison, Dane County, Wisconsin. The defendant stated that he has recently graduated from the University of Minnesota, and is now staying at his parent's residence at this location. The defendant stated that during the summer, he has worked as a volunteer at a residential co-ed youth camp in Mukwonago, Wisconsin, where he has worked during previous summer breaks.

The defendant stated that he has engaged in on-line conversations with persons who identified themselves as minor females, and he has downloaded images of minor females engaged in sexually explicit conduct. He stated that one image depicted an unclothed girl with her legs spread, and others showed unclothed girls engaged in sex acts with adult men. He estimated the age of the youngest child pornography image he had downloaded was 9-10 years old.

Your complainant reports that on 07/30/2009, she reviewed three images recovered from the computer hard drive that the defendant identified as the computer that he used to download pornography. They are described briefly as follows:

1. A naked girl, age 9-11, with legs spread, exposing her genital area.
2. A naked girl, age 12-13, lying on her stomach, using her fingers to spread her genital labia.
3. A naked girl, age 10-12, seated with her legs spread, exposing her genitals, and an adult male toe is in her vagina.

Your complainant believes the defendant's statements reliable because they are against his penal interest.

Subscribed and sworn to before me,
and approved for filing on:

This 3rd day of August 2009.



ASSISTANT/DEP DISTRICT ATTORNEY
DANE COUNTY, WISCONSIN



COMPLAINANT