

STATE OF WISCONSIN

CIRCUIT COURT

ROCK COUNTY

STATE OF WISCONSIN

Plaintiff,

vs.

MARCUS JOHNSON CAUSEY

816 Hackett Street

Beloit, WI 53511

DOB: 04/10/1985

Sex/Race: M/B

Eye Color: Black

Hair Color: Black

Height: 6 ft 02 in

Weight: 230 lbs

Alias: Also Known As OSO

Defendant.

DA Case No.: 2020RO001240

Assigned ADA: Gerald A. Urbik

Agency Case No.: JV2004599

JV2000903

JV2003336

JV1969750

Court Case No.: 2020CF_____

CRIMINAL COMPLAINT

For Official Use

The undersigned, being first duly sworn, states that:

Count 1: MANUFACTURE/DELIVER HEROIN (<= 3G), SECOND AND SUBSEQUENT OFFENSE

The above-named defendant on or about Friday, December 20, 2019, in the City of Janesville, Rock County, Wisconsin, did deliver a controlled substance, to-wit: Heroin, in an amount of 3 grams or less, contrary to sec. 961.41(1)(d)1, 939.50(3)(f), 961.48(1)(b) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

And further, invoking the provisions of sec. 961.48(1)(b) Wis. Stats., because the defendant is a subsequent offender, having been convicted of Delivery of Cannabis on October 30, 2008 in Winnebago County Circuit Court, Illinois, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 4 years.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

Count 2: SECOND DEGREE RECKLESSLY ENDANGERING SAFETY

The above-named defendant on or about Friday, December 20, 2019, in the City of Janesville, Rock County, Wisconsin, did recklessly endanger the safety of Samantha J. Brown, contrary to sec. 941.30(2), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 3: MANUFACTURE/DELIVER HEROIN (<= 3G), SECOND AND SUBSEQUENT OFFENSE

The above-named defendant on or about Sunday, January 05, 2020, in the City of Janesville, Rock County, Wisconsin, did deliver a controlled substance, to-wit: Heroin, in an amount of 3 grams or less, contrary to sec. 961.41(1)(d)1, 939.50(3)(f), 961.48(1)(b) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

And further, invoking the provisions of sec. 961.48(1)(b) Wis. Stats., because the defendant is a subsequent offender, having been convicted of Delivery of Cannabis on October 30, 2008 in Winnebago County Circuit Court, Illinois, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 4 years.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

Count 4: SECOND DEGREE RECKLESSLY ENDANGERING SAFETY

The above-named defendant on or about Sunday, January 05, 2020, in the City of Janesville, Rock County, Wisconsin, did recklessly endanger the safety of Andrea Jean Robar, contrary to sec. 941.30(2), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 5: MANUFACTURE/DELIVER HEROIN (<= 3G), SECOND AND SUBSEQUENT OFFENSE

The above-named defendant on or about Sunday, January 19, 2020, in the City of Janesville, Rock County, Wisconsin, did deliver a controlled substance, to-wit: Heroin, in an amount of 3 grams or less, contrary to sec. 961.41(1)(d)1, 939.50(3)(f), 961.48(1)(b) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

And further, invoking the provisions of sec. 961.48(1)(b) Wis. Stats., because the defendant is a subsequent offender, having been convicted of Delivery of Cannabis on October 30, 2008 in Winnebago County Circuit Court, Illinois, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 4 years.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

Count 6: SECOND DEGREE RECKLESSLY ENDANGERING SAFETY

The above-named defendant on or about Sunday, January 19, 2020, in the City of Janesville, Rock County, Wisconsin, did recklessly endanger the safety of Anthony R. Skrede, contrary to sec. 941.30(2), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 7: MANUFACTURE/DELIVER HEROIN (<= 3G), SECOND AND SUBSEQUENT OFFENSE

The above-named defendant on or about Sunday, January 19, 2020, in the City of Janesville, Rock County, Wisconsin, did deliver a controlled substance, to-wit: Heroin, in an amount of 3 grams or less, contrary to sec. 961.41(1)(d)1, 939.50(3)(f), 961.48(1)(b) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

And further, invoking the provisions of sec. 961.48(1)(b) Wis. Stats., because the defendant is a subsequent offender, having been convicted of Delivery of Cannabis on October 30, 2008 in Winnebago County Circuit Court, Illinois, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 4 years.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

Count 8: SECOND DEGREE RECKLESSLY ENDANGERING SAFETY

The above-named defendant on or about Sunday, January 19, 2020, in the City of Janesville, Rock County, Wisconsin, did recklessly endanger the safety of Rosemary Wynne Stevens, contrary to sec. 941.30(2), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 9: MANUFACTURE/DELIVER HEROIN (<= 3G), SECOND AND SUBSEQUENT OFFENSE

The above-named defendant on or about Sunday, January 26, 2020, in the City of Janesville, Rock County, Wisconsin, did deliver a controlled substance, to-wit: a controlled substance analog of Heroin, in an amount of 3 grams or less, contrary to sec. 961.41(1)(d)1, 939.50(3)(f), 961.48(1)(b) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

And further, invoking the provisions of sec. 961.48(1)(b) Wis. Stats., because the defendant is a subsequent offender, having been convicted of Delivery of Cannabis on October 30, 2008 in Winnebago County Circuit Court, Illinois, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 4 years.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

Count 10: SECOND DEGREE RECKLESSLY ENDANGERING SAFETY

The above-named defendant on or about Sunday, January 26, 2020, in the City of Janesville, Rock County, Wisconsin, did recklessly endanger the safety of Zachary Peter Terpstra, contrary to sec. 941.30(2), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

PROBABLE CAUSE:

Officer Mahaffey reports that on December 20, 2019, at about 3:43 p.m., he and other officers with the Janesville Police Department were dispatched to 2033 Sunnyside, in the City of Janesville, Rock County, Wisconsin, in response to a report of an overdose report. Officer Mahaffey reports that upon his arrival at the scene, he observed a white car running in the front yard of the residence. Officer Mahaffey reports the car was backed up into a child's slide and nearly touching the home's front deck. Officer Mahaffey reports that it appeared that the vehicle had backed from the street onto the lawn and he observed a scrape on the terrace consistent with the car's underbelly scraping it while climbing from the street to the yard. Officer Mahaffey reports he subsequently spoke with J.B., who stated his niece came to the front door and stated that her mom needed help. Officer Mahaffey reports that J.B. stated that he subsequently observed Samantha Brown in the driver's seat of the white vehicle, unconscious, and barely breathing. J.B. stated that he knew she had a history of using heroin and subsequently dug through her purse that was also in the vehicle and located her Narcan. J.B. stated that he used the Narcan on S.B. and then called 911 because he was afraid she was going to die. J.B. stated that S.B. had left the residence at around noon to take her two year old son to Beloit and returned around 3:00 to 3:15 p.m. J.B. stated that Samantha Brown then left the residence at about 3:30 p.m. with her six year old daughter in order to go to Samantha Brown's appointment for Suboxone. J.B. stated that three to five minutes later, Samantha Brown's six year old daughter, S.I.B., DOB: 11/24/2013, came in through the door asking him to help her mom. Officer Mahaffey reports he subsequently spoke with S.I.B., who stated that she went to Madison Elementary School and was leaving with her mother to go to a doctor's appointment. S.I.B. stated that she was seated in the front passenger seat and her mother backed up into the front yard. S.I.B. stated that her mother then started spitting up on herself and S.I.B. ran inside to get her uncle to help her.

Officer Mahaffey reports he subsequently made contact with Samantha Brown, who signed a consent form to search her residence at 2033 Sunnyside. Officer Mahaffey reports that he and other officers subsequently searched the residence during which time they located a large

amount of drug paraphernalia, including syringes, baggie corners, and cook kits in the northwest bedroom. Officer Mahaffey reports the syringes were located on the floor, under the bed, and in the open garbage. Officer Mahaffey reports he also located prescription pill bottles in Samantha Brown's name in the bedroom as well. Officer Mahaffey reports in the upstairs bathroom, officers located a pill bottle in Samantha Brown's name, along with numerous baggies of residue, Fentanyl test kits, and Narcan. Officer Mahaffey reports that cooker caps and syringes were also in the bathroom drawers, which were easily accessible to children. Officer Mahaffey reports that rotting food, tin foil patches with suspected drug residue, pills, cigarette butts, and empty beer bottles were located in the basement of the residence. Officer Mahaffey reports that Officer Fuhrmann subsequently searched Brown's vehicle and located .5 grams of a white powder, which subsequently tested positive for Fentanyl.

Officer Fuhrmann reports that on December 20, 2019, he and Officer Mahaffey spoke with Samantha Brown at St. Mary's Hospital. Officer Fuhrmann reports that Brown stated that she had purchased the heroin that she had overdosed on from "Oso." Officer Fuhrmann reports that he was aware from previous investigations that "Oso" is the street name for Marcus Causey. Officer Fuhrmann reports that Brown allowed him to look at her cell phone at which time he observed text message communications between Brown and an Andrew Hamilton, who indicated that he was going to give her \$60.00 to purchase heroin from "Oso." Officer Fuhrmann reports that the text messages also indicated that Brown met with Hamilton for the purpose of Hamilton giving her the \$60.00 and Brown subsequently indicated that she was going to meet with Oso to buy the heroin. Officer Fuhrmann reports that he also located Facebook messages to Brown from Marcus Causey on Brown's phone that started at 11:40 a.m. that morning. Officer Fuhrmann reports he also observed a message from Causey at around 1:00 p.m. that day at which time Causey indicated that he was "pulling up in two minutes." Officer Mahaffey reports he again spoke with Brown, who indicated that she used approximately 1 gram of heroin per day after getting addicted to pain pills. Brown further indicated that she had purchased heroin from Oso at about 1:00 p.m. that day and he was her main source for heroin. Brown stated that she was also purchasing heroin for her friend, Andrew Hamilton, and in the process of purchasing the heroin for Hamilton, she would receive a small amount of the heroin for free. Brown stated that she had purchased a total of \$70.00 worth of heroin from Oso that day and that \$40.00 came from Hamilton and \$30.00 came from her. Brown indicated that Oso had delivered the heroin to her house on Sunnyside, in the City of Janesville.

Officer Bartmess reports that on January 5, 2020, at about 5:07 p.m., he was dispatched to 304 Madison Street, in the City of Janesville, Rock County, Wisconsin, in response to report of a possible drug overdose. Officer Bartmess reports that upon his arrival at the scene, he observed a male subject identified as Carlos Carson standing over a female subject that was unresponsive and later identified as Andrea Robar. Officer Bartmess reports he asked Carson what drugs Robar had taken and Carson stated, "20 dollars worth of opioids." Officer Bartmess reports that EMS personnel arrived a short time later and administered Narcan to Robar at which time she became responsive and was transported to Mercy Hospital. Officer Bartmess reports that Robar stated that she had taken heroin earlier in the day, but would not provide the name of her supplier.

Officer Grahn reports that on January 19, 2020, at about 11:33 a.m., he responded to 1730 Mayfair Drive, in the City of Janesville, Rock County, Wisconsin, in response to a report of a drug overdose. Officer Grahn reports that upon arriving at the residence, he made contact

with Officer Northrop who stated that they had been called to the residence because a subject identified as Rosemary Stevens had overdose. Officer Grahn reports that Officer Northrop stated that Stevens' boyfriend, Anthony Skrede, had called 911 to report the overdose. Officer Grahn reports that Officer Northrop also advised that Skrede was having trouble keeping his eyes open and staying awake and was acting lethargic. Officer Grahn reports that Officer Northrop stated that Skrede told him that he had also ingested heroin after discovering that Stevens had overdosed. Skrede stated that he had met Stevens while both of them were in rehab in California and had moved to Janesville approximately four to five months ago. Officer Grahn reports that they had received the heroin from "Mike" who is also a heroin user and was a middle man for the dealer who was a black male who went by the street name of "Oso." Officer Grahn reports that Skrede allowed him to view his text messages, which indicated that the heroin deal would actually occur on that day and that the phone number was associated by a subject identified as Timothy McAdory.

Officer Grahn reports that on January 27, 2020, at about 5:14 p.m., he spoke with Timothy McAdory at the Rock County Jail. Officer Grahn reports that McAdory admitted that he had facilitated the heroin deal between Skrede and the actual dealer on January 19, 2020. Officer Grahn reports that McAdory stated that the supplier of heroin was a subject who he knew by the street name of "Oso." McAdory stated that he usually purchased heroin from Oso and believed that he had meddle the deal between Skrede and Oso that resulted in Stevens and Skrede's overdose.

Officer Sharp reports that on January 26, 2020, at about 5:30 p.m., he and other officers with the Janesville Police Department were dispatched to 304 Madison Street, in the City of Janesville, Rock County, Wisconsin, in response to a report of a drug overdose. Officer Sharp reports that he had just been at the residence two weeks earlier when Andrea Robar had overdosed at the residence. Officer Sharp reports that when he arrived at the residence on January 26, 2020, Officer Hollingshead was already on the scene and Janesville paramedics were treating a male subject laying on the ground who Officer Sharp recognized as Zachary Terpstra. Officer Sharp reports that he subsequently had contact with Carlos Carson at the residence, who advised that he was woken by Tasha Slaughter who also resides at 304 Madison Street and was yelling for him for help because Terpstra was unconscious because he had used too much heroin. Carson stated he told Slaughter to call 911.

Officer Fuhrmann reports that on January 26, 2020, at about 6:00 p.m., he spoke with Zachary Terpstra at Mercy Hospital. Officer Fuhrmann reports that Terpstra stated that he had recently started using heroin and had gone done to Beloit with his roommate, Andrea Robar, and purchased a "dub" of heroin from a subject who he knew as "Oso." Terpstra stated that he purchased the heroin approximately one to two hours before overdosing. Terpstra stated that he injected the heroin that he had purchased from Oso into his arm in the kitchen of 304 Madison Street and the next thing he remember was being awoken by paramedics. Terpstra stated that he had purchased heroin from Oso several times in the past. Officer Fuhrmann reports he did observe that Terpstra had a fresh puncture mark on his inner right forearm.

Officer Fuhrmann reports that March 13, 2020, he spoke with Robar about three heroin overdoses that had occurred at 304 Madison Street. Officer Fuhrmann reports that in July 2019, Officer Schoonover had investigated a non-fatal heroin overdose involving two victims at that address and one of the victims identified a subject by the street name of "Oso" as the subject who had provided the heroin that caused the overdose. Officer Fuhrmann reports that

in August of 2019, Officer Northrop spoke with a female subject involved in drug use. Officer Fuhrmann reports the female subject identified Marcus Causey, a/k/a "Oso" as a big heroin dealer in the Janesville/Beloit area. Officer Fuhrmann reports that the subject further indicated that Causey usually rode as passenger in vehicles and always had a gun under his seat and his main girlfriend was a subject by then name of Savannah. Officer Fuhrmann reports the subject also indicated that Causey had the best heroin in the area and also sold crack cocaine. Officer Fuhrmann reports that on March 13, 2020, he spoke with Andrea Robar, who stated that on January 5, 2020, she purchased heroin from a subject who she knew as "Oso" and had heard that the subject's first name might be Marcus. Robar stated that Oso was a tall, heavy set black male and used to have dreadlocks before cutting them short. Officer Fuhrmann reports the description provided by Robar matched the description of the individual who he knew to be Marcus Causey. Robar stated that on January 5, 2020, she had Marcus deliver her \$50.00 worth of heroin to her residence at 304 Madison Street and that she used approximately \$20.00 worth of the heroin before overdosing and waking up in the hospital. Officer Fuhrmann reports he then asked Robar about another overdose that occurred on January 26, 2020, at her residence at 304 Madison Street. Officer Fuhrmann reports the subject by the name of Zachary had overdosed at the residence on that day. Officer Fuhrmann reports that Robar stated that on January 26, 2020, she, Zachary, Zachary's friend Anthony, and Tasha Slaughter all went to Beloit to purchase heroin. Robar stated that she and Zachary planned to purchase \$40.00 worth of heroin while Anthony planned to purchase \$20.00 worth of heroin from Marcus. Robar stated that she made the arrangements to purchase a total of \$40.00 worth of heroin from Marcus by calling him on his cell phone. Robar stated that they all drove to Beloit in Anthony's vehicle to complete the drug transaction and they met Marcus near an alley by Rocky's Corner Store on Lincoln. Robar stated that she got into Marcus' vehicle and received two bags of heroin in exchange for the money. Robar stated that while driving back to Janesville, Zachary used his portion of the heroin and when they arrived back at 304 Madison Street, she observed that Zachary was beginning to overdose and called 911. Officer Fuhrmann reports he also asked Robar about an overdose that had occurred on March 4, 2020, at Robar's residence where Tasha Slaughter had overdosed on heroin and was subsequently revived. Robar stated that she was not present at the residence during the overdose but had returned to find Slaughter on the floor and called 911. Robar stated that after Slaughter was released from the hospital, Slaughter told her that she purchased the heroin from Marcus.

Deputy Wenger, of the Rock County Sheriff's Office, reports that in February of 2020 he met with a confidential informant who indicated that he/she could purchase heroin from a drug dealer who goes by the name of "Oso." Deputy Wenger reports that he had received information from other law enforcement officers that "Oso" is the street name for Marcus Causey. Deputy Wenger reports that on March 2, 2020, at about 5:05 p.m., he and DCI Special Agent Brian Hawley met with the confidential informant (CI) at which time the CI contacted "Oso" by phone. Deputy Wenger reports that the CI previously showed him a Facebook picture of the subject who he knew as "Oso" and he recognized the person in the picture as being Marcus Causey. Deputy Wenger reports that after the CI called the number he had for Causey, a male voice answered, which the CI subsequently identified as Causey. Deputy Wenger reports that Causey directed the CI to go to the area of Roosevelt and Garfield in the City of Beloit, Rock County, Wisconsin, for the drug transaction. Deputy Wenger reports that the CI was subsequently outfitted with recording devices and provided with \$100.00 in U.S. Currency. Deputy Wenger reports the CI again made contact with Causey after he arrived at that area and was told to go to "Rocky's," which Deputy Wenger knew to be Rocky's

Supermarket at 1103 St. Lawrence Avenue in the City of Beloit. Deputy Wenger reports that the CI subsequently arrived at Rocky's at 5:29 p.m., and again had phone contact with a subject at the same phone number that was used to arrange the buy and told to follow a blue vehicle. Deputy Wenger reports that surveillance units subsequently located a blue 2007 Dodge Nitro, which the CI followed to a block on West Grand Avenue in the City of Beloit. Deputy Wenger reports at this time the Dodge Nitro stopped and the CI exited his/her vehicle and entered the other vehicle. Deputy Wenger reports he was subsequently advised by the CI that the driver, who was subsequently identified as Nathan Krambeer from the video surveillance device the CI was wearing, provided him three baggies of suspected heroin and one baggie of suspected crack cocaine in exchange for the \$100.00 the CI had been given. Deputy Wenger reports that the CI subsequently confirmed in a written statement that Causey (a/k/a Oso) had arranged the drug deal with Krambeer. Deputy Wenger reports the three bags of suspected heroin had a total package weight of 1.5 grams and he did test one of the baggies for Fentanyl through the use of a field test and did receive a positive test for Fentanyl. Deputy Wenger reports that he then tested the suspected bag of cocaine, which had a total package of .3 grams for the presence of cocaine through the use of a field test and received a positive test result.

DCI Special Agent Brian Hawley reports that in November of 2019, Marcus Causey was identified as a heroin dealer in the Rock County area. Special Agent Hawley reports that on January 10, 2020, a CI attempted to purchase 10 grams of heroin from Causey in Janesville during which time Causey fled in his vehicle from marked squad cars prior to the delivery taking place. Special Agent Hawley reports that on March 3, 2020, a CI purchased heroin from a subject sent by Causey in the City of Beloit. Special Agent Hawley reports that he subsequently learned from Janesville Police Officer Ben Fuhrmann that he had probable cause to arrest Causey for recklessly endangering safety as a result of a heroin overdose in the City of Janesville. Special Agent Hawley reports that on March 9, 2020, a GPS tracking device was placed on a vehicle pursuant to a court order that was believed to be used by Causey to deliver heroin. Special Agent Hawley reports that also on March 9, 2020, Officer Fuhrmann received information from a CI, who indicated that Causey was getting his heroin supply from the State of Ohio. Special Agent Hawley reports he was further advised that Causey was using white female subjects to drive him in their vehicles to purchase large amounts of heroin and crack cocaine and these trips occurred approximately every two weeks. Special Agent Hawley reports that on March 11, 2020, while monitoring both Causey's cell phone locations and the vehicle tracking device, he discovered that both devices indicated that Causey was on I-90 in Illinois and continued monitoring of the devices revealed that Causey had traveled into Indiana and Ohio before traveling back to Wisconsin at about 4:30 a.m. on March 12, 2020.

Special Agent Hawley reports that on March 12, 2020, at about 8:00 a.m., he and other officers arranged to arrest Causey in the vehicle that was equipped with the GPS device that was traveling westbound on I-90 near Beloit, Rock County, Wisconsin. Special Agent Hawley reports that he and Special Agent Grunewald were able to identify Causey as the front passenger in the vehicle as it traveled westbound on the interstate and exited at Highway 81/Milwaukee Road in the City of Beloit, Rock County, Wisconsin. Special Agent Hawley reports the vehicle Causey was traveling in was subsequently stopped at which time Causey was placed under arrest. Special Agent Hawley reports that when Causey was searched by Beloit Police Officer Buroker, a package, wrapped in black electrical tape, fell out of Causey's pants leg. Special Agent Hawley reports the driver of the vehicle was subsequently identified as Jessica Maskewit. Special Agent Hawley reports that he subsequently opened the package

found on Causey and discovered that it contained 369.41 grams of suspected heroin. Special Agent Hawley reports that he subsequently tested the substance through the use of a field test and did receive a positive test result for heroin. Special Agent Hawley reports the total weight of the heroin without the packaging material was 324.09 grams.

Special Agent Hawley reports that he had previously received information that Causey resided with his girlfriend, Savannah Crabtree, at 816 Hackett Street, in the City of Beloit, Rock County, Wisconsin. Special Agent Hawley reports that the residence was subsequently searched at which time a 9 mm Smith & Wesson handgun was located in a bedroom along with 11.29 grams of THC, 14.94 grams of heroin, and 1.09 grams of MDMA.

Deputy Wenger reports that on March 13, 2020, he made contact with Marcus Causey at the Rock County Jail. Deputy Wenger reports that after advising Causey of his Miranda Rights, Causey stated that he wanted a lawyer. Deputy Wenger reports that while speaking with Officer Fuhrmann, Causey interrupted him and stated, "Anything in the house is mine," and repeated this statement several times. Deputy Wenger reports that while attempting to clarify whether or not Causey wished to speak with an attorney, Causey stated, "My house I live in. Hackett. Anything in that house is mines," and "The stuff is mines in the house, not my girls. I'm a grown-ass man."

Assistant District Attorney Gerald A. Urbik reports he has reviewed the Winnebago County, Illinois Circuit Court record for Marcus J. Causey, DOB: 04/10/1985 which reflects that on October 30, 2008, Causey was convicted of delivery of between 5 and 10 grams of cannabis (THC) in Winnebago County Circuit Court, Illinois and was also convicted of aggravated discharge of a firearm on June 3, 2005, in Winnebago County Circuit Court, Illinois and sentenced to 8 years in prison.

Based on the foregoing, the complainant believes this complaint to be true and correct.

GAU/bjf