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|                    |            |               |   |          | ficial Use |                         |
|--------------------|------------|---------------|---|----------|------------|-------------------------|
| STATE OF WISCONSIN | CIRC       | UIT COURT     | CHIPPEWA COUNTY   | <u>′</u> |            |                         |
| STATE OF WISCONSIN | Plaintiff, | Assigned DA V | 2022CH000825<br>NADE C NEWELL<br>No.: 22CF02795<br>D: 72CF265 |          | 2022       | -0<br>-10               |
| vs.                |            |               | 1:00 PM BRANCH III  |          | 2 KPR 27   | PIL<br>Sex de de<br>Til |
|                    | Defendant. | CRIM          | INAL COMPLAINT  |          |            |                         |
|                    |            |               |   |          | <u>α</u>   |                         |

Jodi Gobrecht, being first duly sworn, states that on information and belief that:

## Count 1; FIRST DEGREE INTENTIONAL HOMICIDE

The above-named defendant on or about Sunday, April 24, 2022, in the City of Chippewa Falls, Chippewa County, Wisconsin, did cause the death of Victim with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a) Wis. Stats., a Class A Felony, and upon conviction shall be sentenced to imprisonment for life.

## Count 2: FIRST DEGREE SEXUAL ASSAULT

The above-named defendant on or about Sunday, April 24, 2022, in the City of Chippewa Falls. Chippewa County, Wisconsin, did have sexual intercourse, with Victim without that person's consent and caused great bodily harm to that person, contrary to sec. 940.225(1)(a), 939.50(3)(b) Wis. Stats:, a Class B Felony, and upon conviction may be sentenced to a term of imprisonment not to exceed sixty (60) years.

## Count 3: 1ST DEGREE SEXUAL ASSAULT OF A CHILD UNDER AGE 13 WITH RESULTING **GREAT BODILY HARM**

The above-named defendant on or about Sunday, April 24, 2022, in the City of Chippewa Falls. Chippewa County, Wisconsin, did have sexual intercourse with a child under the age of thirteen. Victim DOB, which resulted in great bodily harm to said child, contrary to sec. 948.02(1)(am), 939.50(3)(a) Wis. Stats., a Class A Felony, and upon conviction shall be sentenced to imprisonment for life.

## PROBABLE CAUSE:

Complainant is a Legal Secretary for the Chippewa County District Attorney's Office and bases this complaint upon the investigations of the Chippewa Falls Police Department, the Chippewa County Sheriff's Department, the Eau Claire Police Department, and other law enforcement agencies. Complainant and the law enforcement officer involved are presumed reliable because of the positions of trust they hold as Legal Secretary for the District Attorney and Law Enforcement Officer, respectively.

On April 24, 2022, at approximately 9:00pm, Officers of the Chippewa Falls Police Department were notified of a missing year-old juvenile, hereafter identified as Victim. Victim's dad reported Victim did not return home from her aunt's house. Victim's father stated at 11:00 pm he went to look for her, and located her bike near the wooded area east of Leinie's Lodge at 124 Elm St, in the City of Chippewa Falls, Chippewa County. A search involving multiple officers was conducted with no sighting of Victim.

STATE OF WISCONSIN - VS -

On April 25, 2022, at 8:54am, the Chippewa Falls Police Department was notified that Victim's body was found not far from where her bicycle was found, by a person who knew Victim and was out searching for Victim. Investigators noted that Victim was found deceased. Investigators at the scene described injuries to the victim consistent with blunt force trauma to the head. Investigators noted that Victim was naked from the waist down.

The following preliminary autopsy information was relating by investigators from the Chippewa County Sheriff's Department: A forensic autopsy was conducted on April 26, 2022, by pathologist Dr. Mills. Dr. Mills stated she observed bite marks on the left buttocks of Victim. Dr. Mills also noted that there was anal learing and biological evidence consistent with a sexual assault was located. Dr. Mills also noted blunt force trauma on the left side of Victim's face.

On April 26, 2022, Eau Police Department Detective Wayne Bjorkman interviewed admitted to helping Victim get her bike at a residence in City of Chippewa stated that Victim rode her bike, while he was on a hoverboard on a trail in the Falls, Mr. City of Chippewa Falls, Chippewa County, Wisconsin, Mr. stated when they left the house it was already his intention to rape and kill Victim, Mr. stated once on the trail he asked Victim to go exploring off the trail. Mr. stated he and Victim walked into the woods. up the hill. Mr. carried his hoverboard and Victim carried her bike. Mr. stated once off the trail he punched Victim in the stomach, knocking her to the ground. Mr. stated he then struck Victim in the head approximately 3 times with a large stick. Mr. stated he then straddled Victim, while Victim was laying on her back, and strangled her until he believed Victim was deceased. Mr. stated he then removed Victim's pants and began stated at some point he recalls biting Victim but couldn't trying to have sex with her. Mr. remember where. Mr. stated he became scared, stopped attempting to have sex with Victim and fled the area. Mr. stated when he returned home he showered and put his dirty clothes in the laundry. Mr. stated he then heard Victim was missing and determined he needed to hide her better. Mr. stated he returned to Victim's body, drug her a few feet, and covered her with leaves.

Subscribed and sworn to before me on 04/27/22 Electronically Signed By: WADE C NEWELL District Attorney

State Bar #: 1024247

Electronically Signed By: Jodi Gobrecht Complainant

04/27/2022 2