

STATE OF WISCONSIN	CIRCUIT COURT	LIBERTY COUNTY
STATE OF WISCONSIN, Plaintiff, vs. RAMONA S. DENG 1963 Gideon Way Freedom, WI 55005 DOB 01/01/1990 Sex/Race: F/B Height: 5 ft 4 in Weight: 138 lbs Defendant.	DA Case No.: 2019LB001 Assigned DA: Rhonda Pearlman Agency Case No.: F-WI-2019-01 Case No. 19-CF-01	<b>CRIMINAL COMPLAINT</b>
		<i>For SPD Use</i>

**CRIMINAL CHARGE**

**Count 1: POSSESSION OF NARCOTIC DRUGS**

The above-named defendant on or about Friday, January 4, 2019, in the Village of Freedom, Liberty County, Wisconsin, did knowingly possess Heroin, a controlled substance included in Schedule I or Schedule II which is a narcotic drug, contrary to sec. 961.41(3g)(am), 939.50(3)(i), a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

And, invoking the provisions of sec. 961.50(1) Wis. Stats., 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: POSSESSION OF DRUG PARAPHERNALIA**

The above-named defendant on or about Friday, January 4, 2019, in the Village of Freedom, Liberty County, Wisconsin County, Wisconsin, did knowingly possess with primary intent to use, a pipe to inhale a controlled substance, contrary to sec. 961.573(1), 939.62(1)(a), 961.50(1) Wis. Stats., a Misdemeanor, and upon conviction may be fined not more than Five Hundred Dollars (\$500), or imprisoned for not more than thirty (30) days, or both.

And, invoking the provisions of sec. 961.50(1) Wis. Stats., 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.

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

The undersigned, being first duly sworn on oath and in that capacity has knowledge of the following: Your affiant is informed from the reports of the Village of

Freedom Police Department kept in the normal and ordinary course of business in which your affiant believes to be truthful and reliable and have proven so on numerous occasions in the past that on or about January 4, 2019 Officer Jake Peralta stopped a suspicious vehicle in the area of Gideon Way in the Village of Freedom in Liberty County, Wisconsin. Ofc. Peralta made contact with the passenger of the vehicle, RAMONA S. DENG, the above-named defendant. Both the passenger and driver seemed nervous and Ofc. Peralta smelled an odor of marijuana.

Ofc. Peralta conducted a search of the vehicle. In the glove box directly in front of the passenger seat, Ofc. Peralta located a plastic baggie containing tan colored powder with solid chunks. The total weight of the baggie was 0.9 grams. Ofc. Peralta field tested a portion of the powder using the Nark II Meckes Reagent test and received a positive indication for the presence of Heroin. In a purse located behind the passenger seat, Ofc. Peralta located a pipe with burnt plant-like material and an odor of marijuana.

Ofc. Peralta interviewed the defendant at the Liberty County Jail. The defendant indicated the vehicle did not belong to her but she was allowed to borrow it. The defendant admitted that she regularly used the vehicle during the last month. The defendant also admitted that the purse and pipe belonged to her and that she used the pipe to smoke marijuana.

The bag containing tan powder chunks was sent to the State Crime Lab for further testing. Examinations of the powder chunks identified the presence of Heroin.

It is believed the statements of DENG are made contrary to her penal interest.

All of the above incidents occurred in Liberty County, Wisconsin.

**WHEREFORE**, as said affiant verily believes and prays that the said **RAMONA DENG** might be arrested and dealt with according to law.

Subscribed and sworn to before me on 01/07/19  
Electronically Signed By:  
Atty. Rhonda Pearlman  
Assistant District Attorney  
State Bar #: 1021202

Electronically Signed By:  
Jake Peralta  
Complainant