

FILED
10-04-2021
Clerk of Circuit Court
Washington County, WI
2021CF000009

STATE OF WISCONSIN CIRCUIT COURT WASHINGTON COUNTY

STATE OF WISCONSIN

Plaintiff,

DA Case No.: 2020WA003236
Assigned DA/ADA: Mark D Bensen
Agency Case No.: 20-3798KPD

vs.

Court Case No.: 2021CF000009

Ingmar Adir Chew Moran

██████████
Kewaskum, WI 53040

DOB: 11/30/1971

Sex/Race: M/H

Alias: Also Known As Ingmar A Chew
Moran

Defendant.

AMENDED
CRIMINAL COMPLAINT

For Official Use

The undersigned, being first duly sworn, states that:

Count 1: REPEATED SEXUAL ASSAULT OF A CHILD

The above-named defendant on and between June 2017 and July 31, 2020, in the Village of Kewaskum, Washington County, Wisconsin, did commit repeated sexual assaults involving the same child, LAC, born in August 2007 where at least three of the assaults were violations of sec. 948.02(1) Wis. Stats., contrary to sec. 948.025(1)(d), 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 2: SEXUAL ASSAULT OF A CHILD UNDER 16 YEARS OF AGE

The above-named defendant on and between September 2020 and November 2020, in the Village of Kewaskum, Washington County, Wisconsin, did have sexual intercourse with a child under the age of sixteen, LAC, DOB born August 2007, contrary to sec. 948.02(2), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

Count 3: SEXUAL ASSAULT OF A CHILD UNDER 16 YEARS OF AGE

The above-named defendant on or about November 26, 2020, in the Village of Kewaskum, Washington County, Wisconsin, did have sexual intercourse with a child under the age of sixteen, LAC, DOB born August 2007, contrary to sec. 948.02(2), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

PROBABLE CAUSE:

Complainant prays that said defendant be dealt with according to law. The basis for the complainant's charge of such offense is he is a sworn officer with the Washington County Sheriff's Office and bases his information upon review of the official police report of Officer S. Larson of the Kewaskum Police Department, who reports on December 16, 2020, he was dispatched to the Kewaskum Middle School regarding a student there who had disclosed a sexual assault to another student. Officer Larson reports that he met with School Counselor Jamie Fait, a citizen witness your complainant believes to be truthful and reliable. Ms. Fait

stated that she met with LAC, a citizen victim your complainant believes to be truthful and reliable. Ms. Fait stated that LAC described that her father, Ingmar Adir Chew Moran, the defendant herein, has been sexually abusing her for the past five years. Ms. Fait indicated that LAC described the most recent incident that occurred on Thanksgiving, which was celebrated on November 26, 2020. LAC described that she wanted a cup of hot chocolate, but her father/the defendant, would only provide it to her if LAC did something to earn it. LAC described that the defendant said she could have the hot chocolate if she put his penis into her mouth. LAC stated that this is a common occurrence. LAC stated that the defendant has surveillance cameras installed in the living rooms and in the bedrooms. LAC stated that her mother heard and saw the conversation. LAC went on to describe that she has given the defendant oral sex at least ten times in the past, has been photographed in the shower by him, and has woken up to the defendant in her room while he is standing with his penis exposed.

Officer Larson reports that on Friday, December 18, 2020, a forensic interview of LAC, who is a child, who turned 13 years of age in August of 2020, was conducted at the Lakeshore Regional Child Advocacy Center by Forensic Examiner Amanda Didier. During the forensic interview, LAC was able to appropriately establish that she knew the difference between telling the truth and telling a lie. LAC was also able to explain that she understood that there are consequences for not telling the truth. LAC was able to establish that she has the appropriate capacity for explaining past events, and she is oriented to time and place. LAC also took an oath to only provide truthful statements to Ms. Didier.

During the forensic interview, LAC disclosed several instances of sexual contact and sexual intercourse with her adoptive father/the defendant. LAC stated that she was adopted, and they have previously resided in the State of New York. LAC described that they moved to the Village of Kewaskum in June three years ago, which is understood to be June of 2017. LAC described that they have lived in the same apartment since moving here, which is located on the [REDACTED] in the Village of Kewaskum, Washington County, Wisconsin. LAC indicated that the defendant began having her touch him approximately five years ago. LAC described that the defendant has also used his cellular phone to take images or videos of her showering. She described that he would put his phone through the shower curtain, and she would attempt to block it with her hand. She stated that he would eventually just hold his phone over the top of the shower curtain. LAC described the defendant as saying, "You're not the only one I do this to." LAC indicated that she had seen images of herself on his phone, and she deleted them. LAC stated that there were other images of nude females, one in her twenties or thirties and other images of girls she believed to be fifteen or sixteen years old, who were depicted squatting, kneeling, or standing nude.

When asked to describe incidents that had occurred, LAC described an incident that occurred when she tripped over their rabbit. LAC stated that as punishment, the defendant made her write out over and over that she should "pay attention where [I'm] walking." LAC stated that the defendant said, "I'll let you off the hook from writing" if she would hold it for four minutes. LAC described that the defendant made her go into the bathroom to do it. LAC describes later during the forensic interview that by "holding it" and "holding his dick," she would actually masturbate the defendant's penis. LAC also used her hand and gestured by repeating a forward and back motion with her right hand cupped. LAC also stated that sometimes the defendant would ask for longer than four minutes by adding on thirty seconds or another minute, and she would not want to do it. LAC also described that "he says it feels good," and white stuff would come out. LAC stated, "Mom calls it cum."

LAC described that he told her to put it in her mouth, and he threatened to take things away from her. LAC described that she swallowed the ejaculate once, and she refused to swallow it after that. LAC stated that she would run and brush her teeth to get the flavor out of her mouth. LAC described the taste like rotten eggs. LAC described the ejaculate as cream or white in color and that it is gooey and slimy. LAC described that these incidents would last four minutes, and even if the white stuff came out in her mouth when there were still thirty seconds left, she would run to brush her teeth and get the flavor out of her mouth. LAC was asked to describe what the defendant would do, and LAC described that he would lean against something because he said it "felt so good." LAC stated that sometimes the defendant would tell her she was "not going deep enough in or fast enough." LAC also described an incident in a hotel room in Indiana where the defendant slapped her in the face right after she turned twelve years old. LAC stated that the defendant has placed his penis into her mouth more than fifteen times.

LAC described that she once saw the "white stuff" coming out of her vagina once. LAC stated that she woke up in her bedroom with her pants down. LAC stated that she could tell it was "cum because of the color and slimy." LAC stated that a "little bit of it was drooling out of my vagina." LAC then went on to describe that this happened about two to three months prior to the interview, and she feared she was pregnant.

LAC described that she has woken up approximately four or five times, she believed while she was twelve years old, to the defendant standing in her room with his pants down. She stated that she saw his "boner." LAC stated that she has awakened to the defendant doing this four to five times, and it occurred when she was twelve. She was unsure if it had occurred since she had turned thirteen years old.

LAC described that the defendant has placed his fingers into her vagina on more than two occasions. LAC specifically recalled an incident where she was in her bedroom, and the defendant came to check to see if she was reading. LAC stated she was wearing shorts, and the defendant put his fingers into her shorts. LAC stated that the defendant told his wife/her mother that LAC was still reading.

LAC also described that on one occasion, she woke up to the defendant with his "dick in my butt." LAC stated that he was moving it in and out, and it hurt. LAC stated that the defendant told her she was being too loud, and the defendant shushed her. LAC stated that when it was over, she had a numb feeling and it also felt like "I had to take a number two." LAC stated that white stuff came out when she wiped. LAC stated she was unsure of when this occurred, but that it did occur at the home they live in now.

As to Count 2, LAC further described an incident that occurred two weeks prior to Thanksgiving 2020. LAC stated that she was grounded, but she wanted to go outside and play like her younger sister. LAC stated that the defendant "said if you put it in your mouth, I'll let you go outside for an hour." LAC stated, "so I did it and we were maybe three minutes in because he makes me do it for four minutes each time, and three minutes in and stuff started pouring out a little bit at a time." LAC stated that she spit and got a piece of gum. LAC stated that the defendant allowed her to go outside.

As to Count 3, LAC described that on Thanksgiving 2020, which was celebrated on Thursday, November 26, 2020, they were at home. LAC stated that she asked the defendant for hot chocolate, and he makes her do things to him into order to have what she wants. LAC described that they were in the bathroom, and she was doing what he told her to do. LAC described that she had been holding "his dick." LAC stated that the defendant then "told her to put it in my mouth." LAC stated that she must have yelled too loudly, "I don't want to!" LAC stated that her mom came looking for her. LAC stated that her mom told her to go upstairs, but she could hear them. LAC stated that her mom was yelling at the defendant. LAC stated that she heard her mom say, "What were you doing?" She heard the defendant reply that she wanted hot cocoa. LAC stated that she heard her mom tell the defendant, "Pull down your pants" and then heard her mom say, "It's hard, you idiot! I can feel it." LAC stated that her mom then came upstairs and asked her what happened. LAC stated she told her mom, and her mom said, "Oh, dear god!" and hugged her. LAC stated that her mom also told her that she was sorry.

LAC stated that she later hid in her closet because she heard the defendant coming upstairs. LAC stated that the defendant said to her, "What did you tell Mom?" LAC stated she said, "Everything," and the defendant responded, "That's bullshit!" which LAC described as defendant saying, "That's bull and the s-word." LAC stated that her mom then yelled, "No, it's not! No, it's not!" LAC stated that she believed the defendant later admitted it to her mom because her mom told her that he admitted it. LAC stated that she had a conversation with the defendant after it all came out, and the defendant told her that it was all her fault. The defendant stated, "If you didn't let me," as well as, "I need help because I have mental issues, and my body just does it." LAC also stated that the defendant said to her, "It's all your fault. You're ruining my marriage."

LAC further stated near the close of the interview that there has not been any touching since Thanksgiving, and the defendant claimed that he has changed.

Complainant also bases his information upon review of the report of Detective D. Klopfenstein of the Washington County Sheriff's Office, who reports on December 18, 2020, he met SLC, LAC's mother, a citizen witness your complainant believes to be truthful and reliable. SLC stated that the defendant had left early his morning to travel to Chicago O'Hare Airport with the intention of travelling to Monterrey City, Mexico, to visit his family. SLC stated that she later received a text message from him indicating that he had arrived. SLC described that the defendant had previously placed Blink cameras inside the residence, specifically in the living room and in the girls' bedroom. SLC stated that her daughters, LAC and KMC, share a bedroom. SLC stated that she first became aware of the sexual abuse on Thanksgiving or November 26, 2020. SLC explained that she woke up and the defendant was not in their bed. SLC stated that she used her phone to check the Blink cameras, and she could see that LAC was not in her bed. SLC stated that she checked the living room camera, but could not see anyone. SLC stated that due to the camera's placement, she cannot view the bathroom or hallway. She stated that she could hear the defendant and LAC via the audio feature of the camera. SLC stated she heard LAC say, "No!" and then "I don't want to put it in my mouth!" SLC stated she heard LAC say this a couple of times. SLC stated to Detective Klopfenstein, "My worst fear, that there's something going on" when asked what she thought hearing LAC say that. SLC stated she believed the defendant was asking LAC for a "blow job." SLC stated that she was LAC walk out from the area where the bathroom would be and had her robe on. SLC stated that it looked like LAC was trying to tie it up, like LAC was putting herself back

together. SLC stated she asked LAC what was going on, and LAC told her, "I was asking dad for hot chocolate." SLC stated she told LAC to go upstairs, and she went into the bathroom. SLC stated that when she entered, the defendant was "acting like he was looking in the mirror." SLC stated she told the defendant to pull down his pants because she wanted to see if he was erect. SLC stated, "He did. He didn't fight me." SLC stated that "it wasn't totally flaccid, but it was a little, but it wasn't like it was super hard." SLC indicated that she believed it had been erect, or he was trying to achieve an erection. SLC stated that it was obvious to her that something was going on.

SLC further stated that she went upstairs and asked LAC what happened. SLC stated that LAC told her she asked the defendant for a hot chocolate, and he told her she could have it but she had to give him a hand job for "four minutes." SLC stated "he was manipulating her that way to get her to do things for him." SLC explained that her initial reaction was that she wanted to slap the defendant. She stated that she went downstairs and told him, "Ingmar, I know. I know. I heard it." SLC stated that the defendant asked her what she had heard. SLC stated she told him that she heard LAC tell him, "No, I don't want to put it in my mouth."

SLC stated that the defendant then broke down and was honest with her. She stated that the defendant admitted overstepping the line and that he needs help. SLC stated that they did not talk about what had specifically occurred or go into any detail at that time. She stated that she talked to LAC and asked her what she wanted to do. SLC stated that the defendant also spoke to LAC. SLC stated that she asked both LAC and the defendant if they had vaginal intercourse, and both denied. SLC stated in the days afterwards, she stated that she spoke more to LAC. LAC disclosed that she has given the defendant a "blow job," and the defendant "has verified that with me, he did do that." SLC stated she asked LAC how long it had been going on, and LAC told her four years ever since we moved in. SLC stated she told LAC that LAC has been with the family for five years, and LAC responded, "Then I guess it's been five years." SLC stated that she understood this to mean that it began when LAC was adopted.

SLC stated that she asked the defendant how long things had been going on, and the defendant tried to justify things to her. SLC stated that the defendant told her, "she told me, she came here with prior knowledge. She's done stuff before." The defendant also stated that LAC said, "Daddy, I know how to give a blow job."

SLC stated that she asked LAC about other sexual activity and specifically asked if the defendant had put his penis into her butt, to which LAC stated yes. SLC described that she asked the defendant, and he told her no, that he tried and could not do it. SLC said that she told the defendant she discussed with LAC, and SLC described the conversation to Detective Klopfenstein. SLC indicated, "He said no, I tried. I couldn't. I couldn't." Detective Klopfenstein reports that SLC stated that neither LAC nor the defendant said he forced himself on her, "like he never held her down." SLC described that she understood the defendant to have manipulated LAC by allowing her off of discipline if she did things to him. SLC also described that both LAC and the defendant admitted that he "went down on her," referring to oral sex on LAC. SLC stated that LAC told her that the defendant would go into her room at night, take pictures of her, and ejaculate on her. SLC stated that the defendant admitted to taking pictures, but he denied ejaculating on LAC. SLC stated that the defendant also admitted to taking pictures of LAC, but that the defendant said he "always deleted them."

SLC further stated that after Thanksgiving, she never allowed the defendant to be alone with the girls. SLC also stated that when the defendant left for Mexico, he took his laptop, an external hard drive, and possibly some USB storage devices.

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

Subscribed and sworn to before me on 10/04/21

Electronically Signed By:

Jeanette K Corbett

Assistant District Attorney

State Bar #: 1033978

Electronically Signed By:

Lieutenant Tim Kemps

Complainant