

**FILED**  
**11-01-2022**  
**Clerk of Circuit Court**  
**Brown County, WI**  
**2022CF001981**  
**Honorable John P.**  
**Zakowski**  
**Branch 6**

| STATE OF WISCONSIN | CIRCUIT COURT<br>BRANCH | BROWN COUNTY |
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| STATE OF WISCONSIN<br>Plaintiff, |  |  |
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vs.

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| DA Case No.: 2022BR007767<br>Assigned DA: David L. Lasee<br>Agency Case No.: 22-259784<br>Court Case No.: 2022CF |
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**SIENNA MARIE PECORE**

853 Tommark Street  
Green Bay, WI 54304  
DOB: 03/05/2007  
Sex/Race: F/I

Defendant.

**CRIMINAL COMPLAINT**

*For Official Use*

Complainant, Kari Hoffman, an Assistant District Attorney, being first duly sworn on oath, deposes and says that:

**Count 1: FIRST DEGREE RECKLESS HOMICIDE**

The above-named defendant, on or about Sunday, October 30, 2022, in the City of Green Bay, Brown County, Wisconsin, did recklessly cause the death of CB, under circumstances which show utter disregard for human life, contrary to sec. 940.02(1) 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: HIT AND RUN - RESULTING IN DEATH**

The above-named defendant, on or about Sunday, October 30, 2022, in the City of Green Bay, Brown County, Wisconsin, did operate a vehicle involved in an accident that resulted in death of CB and failed to reasonably investigate what was struck and if the operator knew or had reason to know that the accident resulted in injury or death of a person or in damage to a vehicle that is driven or attended by a person, and failed to stop the vehicle she was operating as close to the scene of the accident as possible and remain at the scene of the accident until she did the all of the following: give her name, address and the registration number of the vehicle she or she was operating to the operator or occupant of or person attending any vehicle collided with and, upon request and if available, exhibit her operator's license to the operator or occupant of or person attending any vehicle collided with and render reasonable assistance to any person injured in the accident, including transporting, or making arrangements to transport the person to a physician, surgeon, or hospital for medical or surgical treatment if it is apparent that medical or surgical treatment is necessary or if requested by the injured person, contrary to sec. 346.67(1)&346.74(5)(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 343.31(3)(j), the Department shall revoke the defendant's operating privilege for five (5) years.

**Count 3: OPERATING A MOTOR VEHICLE WITHOUT OWNER'S CONSENT**

The above-named defendant, on or about Sunday, October 30, 2022, in the City of Green Bay, Brown County, Wisconsin, did intentionally take and drive a vehicle, white Toyota Corolla (WI - AHR1718), without the consent of the owner, Sara M. Eisch, contrary to sec. 943.23(2) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

Complainant is an Assistant District Attorney with the Brown County District Attorney's Office and knows of the above offense(s) on information and belief based upon:

**PROBABLE CAUSE:**

The complainant, being duly sworn on oath, swears that she has had the opportunity to review the police reports from Officers D. Johnson, C. Johnson, Werchek, Fuerst, Ramirez, Sergeant Hamill and Detective Graf of the Green Bay Police Department, and other documents supporting this complaint referenced herein, which are the types of reports and documents kept in the ordinary course of business, which complainant believes to be truthful and reliable because they have proven to be truthful and reliable on numerous occasions in the past.

The complainant further asserts that based upon her review of the referenced reports and/or supporting documents, the incidents alleged occurred in the City of Green Bay, Brown County, Wisconsin.

1. Complainant's review of a report prepared by Officer C. Johnson of the Green Bay Police Department which indicates, in part:

On October 30, 2022, at approximately 7:45 p.m., I was dispatched to W. Mason Street at S. Oneida Street in the City of Green Bay in Brown County for an accident. The call notes provided there was a three vehicle accident with injures. Prior to my arrival, an occupant of one vehicle was transported to the hospital with life threatening injures.

Occupants of one of the vehicles left the scene. I assisted with crowd control and secured the scene with crime scene tape. Officer Mills requested an officer make contact with a witness for a statement at \*\*\*\* Admiral Ct., #2. I verbally identified the witness as R.C.N.

R.C.N. provided the following summarized written statement:

On October 30, 2022, at approximately 7:40 p.m., R.C.N. was parked in the Auto Zone parking lot on W. Mason Street, talking on the phone and looking out her window. She observed a white car driving down W. Mason Street toward the bridge that appeared to be going over highway speeds. At the intersection of W. Mason Street at S. Oneida Street, R.N.C. stated the white car hit a black car. R.N.C. indicated she did not know where the black car came from and did not know what color the traffic lights were at the time of the accident. R.N.C. stated she checked on the occupants of the black car who

were standing outside of it and they stated they were okay. By the time she got to the white car, R.N.C. advised there were approximately 20 people around it and she observed a Hispanic male, about 15-17 years old, wearing a red sweatshirt hanging out of the rear driver's side door. She stated people pulled him out of the car and after not being able to find a pulse, started CPR.

R.N.C. stated she heard a female yelling and screaming and a male said something along the lines of "we gotta get the fuck out of here." A group of kids ran across the street to a strip mall parking lot and got into a white mid-size SUV and pulled off.

2. Complainant's review of a report prepared by Officer D. Johnson of the Green Bay Police Department which indicates, in part:

On 10/30/2022, at approximately 7:40 PM, an accident with injury was dispatched out at the intersection of S. Oneida St. and W. Mason St. Call notes indicated that three vehicles were possibly involved. I added myself to the call and while in route, I heard that other officers were already on scene. As I approached the intersection, I heard another officer call out that there should be a gray sedan parked in the AutoZone parking lot that was involved and the driver was sit inside of it. I observed a gray sedan bearing WI auto plate AGW7123, in the west end of the parking lot with what appeared to be significant damage to the passenger side rear door and with one occupant in the driver seat.

I approached the vehicle and met R.G.M., who was the driver of the vehicle. R.G.M. advised me that he had been involved in the accident, his vehicle having been hit in the front bumper. R.G.M. denied EMS. R.G.M. then advised that he was just at the Walgreens at the corner of the accident intersection. R.G.M. said he exited the Walgreens parking lot onto S. Oneida St. traveling northbound. R.G.M. said the light at the intersection was red for him initially, so he stopped his vehicle in the left turn lane at the intersection of S. Oneida St. and W. Mason St. as his intention was to turn left onto Mason St. to travel west. R.G.M. said when he got the green light, he observed no oncoming traffic on S. Oneida St. southbound and proceeded to do his left turn. R.G.M. said he got to about the left turn lane of the eastbound lanes of W. Mason when his vehicle was struck by a white or silver colored suburban. R.G.M. said it happened all really fast, and after the suburban hit his car, he saw it hit a black car before continuing on. R.G.M. said he did not want to remain in traffic in the middle of the intersection, so he operated his vehicle to the AutoZone parking lot. R.G.M. said he did not see anything else pertaining to the accident. R.G.M. was unable to provide any description of the driver of the vehicle that hit him. R.G.M. advised that the vehicle that hit him was traveling eastbound on W. Mason St. and because there were stopped vehicle in the east traveling lanes, the vehicle that hit him must have gotten into the left turn lane of the eastbound lanes at the intersection to swerve around the stopped vehicles.

R.G.M.'s vehicle had significant front-end damage to the vehicle. A majority of the front bumper was either broken off or pushed in to itself. Vehicle fluid trails were observed from the intersection of the crash to where R.G.M. had parked his vehicle. The large dent on the passenger rear door was old damage, and not as a result of the accident that had just occurred.

3. Complainant's review of a report prepared by Officer Werchek of the Green Bay Police Department which indicates, in part:

On October 30, 2022 at approximately 19:40 hours, a call was dispatched at W. Mason Street and S. Oneida Street for an accident with injuries. Call notes stated that a three-vehicle accident with possible injuries with statements made that a vehicle spun out and there are unknown injuries. A blue vehicle was beginning to smoke and a female is hanging out of one of the vehicles with another vehicle on fire. Another caller stated that gas was leaking from a vehicle and there was a nurse on scene who was checking on injuries. Further notes stated that occupants of a white truck ran eastbound on Mason Street on foot and one vehicle was on fire with no one inside. There was an unknown description of the parties that ran. There is CPR in progress. I cleared myself from my current call and added myself to the accident.

Once I arrived on scene I parked my squad in the southbound lane of S. Oneida Street on the north side of W. Mason Street for scene security. I then spoke to the driver and passenger of one of the vehicles involved. The occupants of the vehicle bearing Wisconsin license plate AJN-7466 identified themselves by Wisconsin photo ID as the driver, C.S., and the passenger of the vehicle as J.L.S.

Upon speaking to C.S. and J.L.S., they stated that they were inside of their vehicle when the accident occurred. J.L.S. stated that she did not witness what had happened and she only caught a glimpse, but C.S. stated that he observed what had happened until the collision and stated that he would be willing to make a statement. C.S.'s summarized written statement is as follows:

On October 30, 2022, at approximately 7:40 PM, C.S. and J.L.S. were traveling in a blue Toyota west bound on W. Mason Street and were stopped at a red light in the left turn lane waiting to turn southbound on Oneida Street. C.S. was the driver. C.S. saw a light-colored sedan traveling eastbound on Mason Street and they were traveling very fast. He stated that it appeared that they did not have control of the vehicle and were swerving. They had no regard for the intersection lights and no intention of stopping for the red light and that is when he observed a vehicle on Oneida Street traveling northbound go into the intersection. He noticed that the vehicle going eastbound was not stopping and he honked his horn in an attempt to avoid a collision. That is when the vehicle going eastbound on W. Mason Street attempted to swerve to avoid the vehicle on Oneida Street and it possibly hit that vehicle. The eastbound vehicle then lost control and hit C.S.'s vehicle head on.

After the collision, C.S. verified he was OK and got out of the driver's seat of the vehicle through the driver's side window and then went to check on his wife in the passenger seat. He assisted his wife out of the seat and got away from the vehicle due to it smoking. They then moved to the sidewalk and waited for rescue to arrive. They both sustained cuts to their hands. He did not consent for his vehicle to be hit or damaged.

4. Complainant's review of a report prepared by Officer Ramirez of the Green Bay Police Department which indicates, in part:

On Sunday October 30, 2022 at approximately 7:42 PM, I responded to the area of W. Mason Street and S. Oneida Street for an accident. Call notes indicated that the accident possibly involved 3 vehicles and injuries.

Upon arrival, a group of people informed me that a white jeep took off from the scene. As I was walking closer, I saw a white sedan with a group of people around it. I saw a male wearing a red zip up hanging out of the back passenger side area on the driver's side. The group of people informed me that the male had a weak pulse, and we assisted the male out of the vehicle. One of the females from the group then started to perform CPR on the male. Shortly after, more officers and Rescue arrived on scene. Rescue then took over medical treatment for the male.

Once Rescue arrived on scene and placed the male in the ambulance, I followed the ambulance to St. Vincent's Hospital. I stood by at emergency room 10 while hospital staff were working on the male. While hospital staff were working on the male, I searched the male's jeans in the attempt to possibly find an ID. I did not find an ID.

After lifesaving efforts from medical staff, medical staff pronounced the male dead at 20:22 hours. I then informed Sgt. O'Brien and Sgt. Krueger of the male's death. The male was later identified as C.B. [a 17 year old male]. The medical examiner was contacted by medical staff. The vehicle C.B. was found in was a white Toyota Corolla bearing WI plates AHR1718.

5. Complainant's review of a report prepared by Officer Fuerst of the Green Bay Police Department which indicates, in part:

On Sunday, October 30, 2022, at approximately 19:40 hours, I was dispatched to the intersection of S. Oneida St. and W. Mason St., for the report of an accident with injuries. Dispatch advised that there were 3 vehicles involved and a caller was stating that it was "really bad". Dispatch further stated that a vehicle had spun out and another vehicle was smoking and starting on fire. A person was seen hanging out of the side of a vehicle and dispatch advised that persons fled from the vehicle and were seen running eastbound from the accident scene on W. Mason St.

While on scene, I was notified that the white vehicle that was on scene was registered to Sara M. Eisch (07/05/1984). I recognized the vehicle as being associated with 853 Tommark St., as well as the vehicle being associated with Sarah's daughter, **Sienna M. Pecore (03/05/2007)**. I recognized this because of a prior incident where I had contact with Sara at her place of employment and was notified that she drove a white Toyota Corolla with the same license plate which was currently affixed to the rear of the vehicle. In speaking with Sara on the prior call, she had been involved in the vehicle being present when an additional female who was identified as C.A.D.-D. Based on prior knowledge of Sienna and C.A.D.D., I believed that they may have been occupants within the vehicle. I had heard over the radio that contact had been made with Sara via phone, who stated that Sienna was not home and the vehicle had been taken while she was sleeping, by Sienna.

I remained on scene as scene security until I was advised by Sgt. Krueger to attempt to make contact at 853 Tommark St., with Sara, and speak with her reference any

information that she may know as to Sienna's whereabouts. Upon arrival at the residence, contact was made at the front door with Sara who agreed to allow officers inside the residence, and consented for officers to walk throughout the residence to confirm that C.A.D.D. and Sienna were not present in the household. Upon conducting a walkthrough of the residence, Sienna and C.A.D.D. were not located within.

I then obtained a written statement from Sara. Her written statement advised that she had last seen Sienna, her daughter, close to noon, and that Sienna was by herself. Sara stated that she had taken a nap and had slept for approximately 6 hours. Sara stated that she woke up between 5:45 p.m. and 6:00 p.m. and she did not notice her vehicle was missing upon awakening. Sara stated that she realized that her car was gone around 6:45 p.m. or 7:00 p.m. Sara stated that she did not give Sienna permission to take the car and that she does not know where Sienna would have gone. Sara stated that she thinks that Sienna would be hanging out with a male by the name of Rezhun E.L. Scott. She also stated that Sienna may be in the presence of C.A.D.D. Sara stated that she believes that Rezhun is Sienna's boyfriend, but does not know where Rezhun lives. Sara stated that Sienna never asks to go to his house and when they do hang out, they typically hang out at her residence. Sara stated that Sienna had taken her car on one prior occasion and had done it because she thinks that she can do what she wants. Sara stated that she knows that Sienna smokes marijuana, but has never caught her or seen her drinking alcohol. Sara stated that she does not believe that Sienna does any other type of drugs. Sara stated that she thinks Rezhun smokes marijuana and that she was told tonight on 10/30/2022, that he sells marijuana. Sara also stated that she knows that C.A.D.D. smokes marijuana.

She also stated that she is the owner of the vehicle that Sienna had taken and that she had gotten in contact with Rezhun and Sienna at 8:52 p.m. Sara stated that she had received a phone call from Sienna from Rezhun's phone. She talked with Sienna for approximately 10 seconds when it sounded like Sienna dropped the phone and started crying. Sara stated that Rezhun picked up the phone and talked to her. Rezhun told her about what had happened and that Sienna was scared. Rezhun stated that he was going to bring Sienna home and he would bring her home around 11:00 p.m. Sara told Rezhun that if he was not going to bring Sienna home, that he needed to take her to the hospital. Rezhun told her that "they" told him not to take her to the hospital and that she does not know who "they" are. Sara stated that the behavior that Sienna exhibited is normal behavior. Sara stated that her friend, Yocelyn Lemus, called her when she had seen the car involved in the accident. Sara stated that Yocelyn came over and that she then gave Rezhun's phone number to her.

Sara stated that Yocelyn started texting Rezhun and was acting like she was Sara. Sara stated that in the text messages she doesn't really remember everything that was said, but the thing she can remember was "bring her home, bring her home right now". Rezhun had texted Yocelyn stating that he had dropped off Sienna and C.A.D.D. at C.A.D.D.'s residence. Sara stated that she left and started to go to C.A.D.D.'s house. While en route to C.A.D.D.'s residence, Sara texted C.A.D.D.'s mom and asked if C.A.D.D. had been dropped off with Sienna. C.A.D.D.'s mom stated that C.A.D.D. had not been seen since Friday, October 28, 2022, and that Sienna had not been dropped off at her residence either. Sara then turned around and went back to her residence. Sara stated that she does not know where Sienna is right now and she is scared for her.

6. Complainant's review of a report prepared by Detective Graf of the Green Bay Police Department which indicates, in part:

On 10/31/2022, I was asked by Lt. J. Allen to interview a **Sienna M. Pecore (3/5/07)** who was reported to be the operator of a vehicle that caused an accident on 10/30/22 at approximately 7:40 PM. The accident occurred at the intersection of W. Mason St. and S. Oneida St. I familiarized myself by reading offices details and was informed by Sgt. Hamill, a member of the accident reconstruction team, that a preliminary estimate of the vehicle that caused the access was that it was traveling at 100 to 110 MPH.

I made contact with Pecore in interview room 4 at the police department after she had been transported from St. Mary's due to receiving a broken arm as a result of the accident. I identified myself to Pecore and explained to her that I was there to talk to her about what had happened. I explained to Pecore that before I did talk with her that I was going to advise her of her Miranda Rights. I did read the Miranda Rights form to Pecore. Pecore stated that she did understand her rights and she did agree to answer questions.

I then proceeded to interview Pecore about what occurred on 10-30-22 getting a time line of events and she did give a written statement. According to Pecore it was at around 2 to 3 PM that Pecore said she did take her mother's vehicle from their residence without her mother's knowledge. Pecore identified her mother as Sara Eisch and the vehicle was identified as a white Toyota Corolla with WI plate AHR1718.

After leaving her residence, Pecore informed me that she went to the residence of A.B.C., who lives at \*\*\*\* 12th Ave in the City of Green Bay. At A.B.C.'s residence Pecore picked up her friend C.A.D-D. (8/15/07) and they went to Bay Park Square Mall. Pecore stated that they were at the mall for around 2 hours before then left and returned to A.B.C.'s residence. Upon their arrival at A.B.C.'s, Pecore said that her friend C.B. was also at the residence.

From Aiden's house, according to Pecore, the four of them then went to Walmart West in the City of Green Bay. Pecore stated that she drove and with her was C.A.D-D., A.B.C. and C.B. Pecore was not sure what time they went to Walmart West, but she stated that it was still light outside. Pecore reported that all four of them went into Walmart where they bought some snacks. From Walmart, they all went back to A.B.C.'s residence. Pecore stated that they were at A.B.C.'s house for a while watching TV and playing with A.B.C.'s dogs. Again, Pecore was not sure of the time, but she stated that she, C.A.D-D. and C.B. did leave A.B.C.'s residence and she thought it was around 20 minutes before the accident happened. Pecore stated that they were in her mother's car and that she was driving, C.A.D.D. was in the front passenger seat and C.B. was in the back passenger seat. I asked Pecore if they were wearing their seat belts. Pecore stated that she was wearing hers and she was not sure, but thought that C.A.D..D. and C.B. had their belts on also. I asked Pecore what was the purpose of them leaving A.B.C.'s house and she said it was to just drive around for a while. Pecore stated that the plan had been to go back A.B.C.'s house. I asked Pecore if anybody else left A.B.C.'s at the same time and she said no.

Pecore informed that she was driving her car on W. Mason St. and saw a white SUV that was being driven by her friend who she identified as Scott Rezhun (Rezhun E.L. Scott 2/3/02). Pecore recalled that A.B.C. was in the car with Rezhun and that the vehicle was a white SUV. Pecore remembered seeing the vehicle in the area of Ridge Rd. to Culver's restaurant. Pecore stated that she drove eastbound and she admitted to speeding. I asked Pecore how fast did she think she was going and she thought it not over 55 MPH. I asked Pecore why was she driving so fast and she said that she did not know and that she just was. I asked Pecore if she was racing another car, weaving in and out of traffic or being encouraged to drive that fast and she said she was not. I informed Pecore that a preliminary speed estimate was that she was traveling in excess of 100 MPH and Pecore said that she did not think that was right.

I asked Pecore if she had been using any drugs or alcohol prior to the accident and she denied any use. I then asked Pecore why did she not stop for the red light at the intersection of W. Mason St. and S. Oneida St. Pecore stated that she saw that the light was green, but then it turned yellow so she thought she could make it through the intersection. Pecore did state that she did remember seeing a vehicle stopped northbound on S. Oneida St. just south of W. Mason St. Pecore recalled the vehicle enter the intersection as she approached. Pecore stated that she then really did not remember what happened. Pecore recalled her vehicle's air bags to go off and that the vehicle was spinning. I asked Pecore how did she get out of the vehicle and she said she went through the front driver window. Pecore stated that the next thing she knew she was in Rezhun's white SUV with C.A.D.D., A.B.C. and another male black she did not know. Rezhun then left the scene and drove to A.B.C.'s house where he dropped off C.A.D.D., A.B.C. and the black male. Pecore stated that Rezhun then drove her to his apartment where she stayed the night until she contacted her mother this morning. Pecore did make mention that her cell phone was last known to be in the car when the accident happened as she no longer has it. I asked Pecore why did she not stay at the scene or contact law enforcement. Pecore's response was that she did not really know and that she was scared.

7. Complainant's review of a report prepared by Sergeant Hamill of the Green Bay Police Department which indicates, in part:

On 11/01/22, as a member of the GBPD traffic crash reconstruction unit, I performed an analysis of surveillance video that had recorded the traffic crash. I analyzed video from Walgreens at 1165 W Mason St and Shell gas station at 1146 W. Mason St. This video had been collected by IFSU. The Walgreens camera faces to the northeast towards the intersection and the Shell camera faces towards the southwest, also towards the intersection.

Both videos show the white Corolla traveling east on W. Mason St a high rate of speed, and striking a vehicle that was turning left from northbound S Oneida St onto W Mason St. The Walgreens camera has the best view of the crash itself. The Shell camera has a longer view of the approach of the intersection. The Corolla had been in the right eastbound lane and began to swerve left just prior to striking the northbound vehicle. The Corolla then struck a vehicle in the westbound left turn lane of W. Mason St, causing the Corolla to spin in a counter clockwise spin. The vehicle appears to spin two

full rotations before coming to rest near the north curb just west of Redwood Dr. The traffic signals were not clearly visible on the videos that I viewed, but it was clear from the behavior of other vehicles that the signal for traffic on W Mason St was red and the signal for S. Oneida St was green at the time of the crash.

I used a Timestamp Camera app to add a time stamp to the videos down to the millisecond after verifying that the videos were playing at full speed utilizing a stop watch. I utilized a time-distance formula to analyze the speed of the Corolla using both cameras. Time was obtained by using the time stamp I added to the video. Distance for the Walgreens camera was obtained by using Google Earth to measure from a known spot on the camera footage to the point of impact with the first vehicle (the northbound vehicle). Distance for the Shell station was obtained by standing under the surveillance camera and having Officer Linsmeyer place his patrol car at a known location of the suspect vehicle on the video. I then used a traffic laser (unit TS001464) to obtain the distance. I tested the laser prior to this at known distances of 25 and 50 feet and found it to be working properly. My analysis of the Walgreens video concluded that the Corolla was traveling an average of 170.9 feet per second or 116.5 MPH over the last 188 ft or 1.1 seconds prior to impact. My analysis of the Shell video concluded that the Corolla was traveling an average of 181 feet per second or 123.4 MPH over the last 362 feet or 2 seconds prior to impact. The posted speed limit here is 35 MPH.

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

Subscribed and sworn to before me on  
11/01/22

Electronically Signed By:

David L Lasee

District Attorney

State Bar #: 1041798

Electronically Signed By:

Kari Hoffman

Complainant