

IN THE IOWA DISTRICT COURT IN AND FOR  
DUBUQUE COUNTY

This Complaint and Affidavit is to be:

- Filed with Court Clerk (cc: CA)  
 Submitted to County Attorney  
 Filed with JCO - Defendant is a Juvenile

Agency Case Number: 2016-000880

Arrest Date: \_\_\_\_\_

## THE STATE OF IOWA

VS.

## OFFENDER

|                                    |                         |                          |  |
|------------------------------------|-------------------------|--------------------------|--|
| Last<br><b>YAGER</b>               | First<br><b>CORBY</b>   | Middle<br><b>LYNN</b>    | Suffix   |
| Address<br><b>3425 DOVE STREET</b> |                         | City<br><b>DUBUQUE</b>   |  |
| Date of Birth<br><b>8/28/1996</b>  |                         | Gender<br><b>FEMALE</b>  | Race<br><b>WHITE - W</b>                       |
| State<br><b>IA</b>                 | Height<br><b>5' 00"</b> | Weight<br><b>134 LBS</b> | Ethnicity<br><b>NOT OF HISPANIC ORIGIN - N</b> |
| State<br><b>IA</b>                 | Height<br><b>5' 00"</b> | Weight<br><b>134 LBS</b> | Eye Color<br><b>BROWN - BRO</b>                |
| State<br><b>IA</b>                 | Height<br><b>5' 00"</b> | Weight<br><b>134 LBS</b> | Hair Color<br><b>BROWN - BRO</b>               |

## OFFENSE

|   |                                    |   |                              |  |                          |
|---|------------------------------------|---|------------------------------|--|--------------------------|
| State<br><input checked="" type="checkbox"/>      | County<br><input type="checkbox"/> | Local<br><input type="checkbox"/>               | Code Section<br><b>711.3</b> | Crime Description<br><b>ROBBERY 2ND DEGREE</b> | Class<br><b>FELC</b>     |
| Location Type<br><b>20 - RESIDENCE/HOME</b>       |                                    |   |                              |  |                          |
| Literal Description                               |                                    |   |                              |  |                          |
| Address<br><b>9442 NOONAN STREET #749</b>         |                                    | City<br><b>DUBUQUE</b>                          |                              | State<br><b>IA</b>                             | Zip Code<br><b>52003</b> |
| Is Date and Time of Incident Known?<br><b>YES</b> |                                    | Incident Date or Low Range<br><b>04/02/2016</b> | Upper Date Range             | Incident Time or Low Range<br><b>02:01</b>     | Upper Time Range         |

## STATUS OF OFFENDER/JUVENILE

|   |  |  |   |
|---|--|--|---|
| <input type="checkbox"/> TAKEN INTO CUSTODY           | CUSTODY  |  | <input type="checkbox"/> SUMMONS TO APPEAR<br>(Citation Issued) |
| <input checked="" type="checkbox"/> WARRANT REQUESTED | <input type="checkbox"/> NO CONTACT ORDER<br>REQUESTED |  | <input type="checkbox"/> RELEASED TO<br>PARENT/GUARDIAN         |

## NARRATIVE

|   |
|---|
| Narrative of Offense Committed<br><br>On or about the above stated date and time, the Defendant did<br>commit robbery in the second degree against Collin A. BROWN (03/04/1995) with the intent to commit a theft, commit one or more of the following acts to assist or further the commission of the intended theft or the person's escape from the scene thereof with or without the stolen property and purposely inflict or attempt to inflict serious injury: 1. Commit an assault upon another. 2. Threaten another with or purposely put another in fear of immediate serious injury. 3. Threaten to commit immediately any forcible felony |
|---|

AFFIDAVIT

## STATE OF IOWA,                    DUBUQUE COUNTY

I, the undersigned, being duly sworn, state that all facts contained in this Complaint and Affidavit, known by me or told to me by other reliable persons form the basis for my belief that the defendant committed this crime

State all facts and persons relied upon supporting elements of alleged crime

On 04/02/2016 at approximately 2:01 AM, Alecea K. LOMBARDI (04/17/1995) of 9442 Noonan Street #749 called 911 to report that three subjects with guns forcibly entered the home she shared with Collin A. BROWN (03/04/1995) demanding drugs and money. At one point during the struggle, BROWN was able to get away and run to trailer #737. BROWN was shot by one of the suspects as he was entering #737, and later died at Mercy Hospital in Dubuque as a result of his injuries. The Dubuque County Sheriff's Office and the Iowa Department of Criminal Investigations responded on this date and are conducting an ongoing investigation.

During interviews conducted with Adrianna M. CHICA (05/27/1997) by DCI, CHICA provided pertinent information to this case. She and her boyfriend, Jeremy DUKES (12/03/1994), had gotten into Dubuque on the evening of 04/01/2016 and spoke with Eric D. CAMPBELL (12/25/1985) at 1506 Iowa Street #1. CHICA said it was then that CAMPBELL informed her and DUKES that someone had stolen \$200

worth of marijuana from him and that he needed to "catch a stain" or "catch a lick" (referring to CAMPBELL'S desire to rob someone to make up the money that he had lost). CHICA said at that point in the night CAMPBELL did not appear to know who he was going to rob or even that it was going to happen that night. CHICA provided that she, DUKES, CAMPBELL and Savanna R. STOTLAR (05/03/1986) were all present for this conversation.

DUKES and CHICA left the apartment to drop DUKES's brother off at their sister's house, and when they returned Corby Lynn YAGER (08/28/1996) was there. CHICA advised that she and DUKES had specifically returned to the apartment to pick up CAMPBELL and YAGER because CAMPBELL and YAGER needed someone to drive them so YAGER could show CAMPBELL where the target for their robbery was. CHICA said it was clear that YAGER had the target (person) and location in mind. CHICA said YAGER did not identify BROWN as the person they were going to rob until the point on their drive when they were by his trailer. CHICA said YAGER had told her, DUKES and CAMPBELL during the car ride that she knew BROWN (although she did not initially refer to him by name). YAGER had told them BROWN was "some white boy that didn't pay attention" and had been robbed four times before. CHICA said it was her understanding YAGER had chosen BROWN as the target of the robbery and YAGER had made comments that she did not want anyone else involved. CHICA said YAGER just wanted CAMPBELL and one other person (because he needed a driver) to commit the robbery.

On 04/21/2016 YAGER was interviewed regarding her involvement in the robbery and murder of BROWN. YAGER denied involvement in the homicide and also stated that she would not have been in BROWN'S trailer park for any reason "unless she was on a cruise". Dubuque City traffic camera surveillance showed two females that appear to be CHICA and YAGER as well as two males that appear to be DUKES and CAMPBELL get into a blue Ford Taurus parked outside of 1506 Iowa Street in Dubuque at 2232 hours on 04/01/2016. The Taurus then can be tracked entering 9442 Noonan Street at approximately 10:40 PM. Private surveillance also showed a vehicle which appeared to be a Ford Taurus driving past 9442 Noonan Street #737 at approximately 10:42 PM. The Taurus is then tracked via traffic camera exiting the trailer park at approximately 10:45 PM.

On 05/14/2016 Kayla BLACKMAN (09/02/1995) recorded a conversation between herself and YAGER using a digital audio recording device provided to her by DCI. During this conversation, YAGER admits to BLACKMAN that she wanted BROWN to be robbed, but not killed. YAGER further told BLACKMAN, "I'm the motherfucking queen of Dead Money, bitch. They do what the fuck I tell them to do. I tell them to send me money, they do it. I'm gonna tell I need a fucking hit on this bitch, they gonna fucking make it happen." YAGER also told BLACKMAN, "Yes, I said it had to be done that night because I needed some motherfucking money."

WILHELM, ELIZABETH

3154

Signature of Complainant or Officer, Officer Name &amp; Number

## GENERAL PROBABLE CAUSE

Defendant Implicated

03 - ADMISSION/STATEMENTS, 07 - IDENTIFIED BY WITNESSES, 14 - OTHER PHYSICAL EVIDENCE

|                                   |  |                             |
|-----------------------------------|--|-----------------------------|
| Operating Motor Vehicle in County | Other Physical Evidence<br><b>VIDEO SURVEILLANCE</b> | Attempted To Inflict Injury |
|-----------------------------------|--|-----------------------------|

## STATE OF IOWA, DUBUQUE COUNTY

|   |   |                    |
|---|---|--------------------|
|    | Subscribed and sworn to before me by the person(s) signing the Complaint and Affidavit(s) on 09/02/2016 |                    |
|   | Notary Name   | <b>ROBERT LYNN</b> |
|   | Commission Number   | <b>724547</b>      |
|   | My Commission Expires   | <b>09/16/2018</b>  |
|    |   |                    |
| <input type="checkbox"/> Peace Officer <input checked="" type="checkbox"/> Notary <input type="checkbox"/> Prosecuting Attorney |   |                    |