IN THE IOWA DISTRICT COURT IN AND FOR LINN COUNTY

STATE OF IOWA

Plaintiff,

COMPLAINT

VS.

ALICIA CHRISTA COLE 2451 8TH AVE SW CEDAR RAPIDS IA 52405 **FECR**

Defendant.

Count 1

THE DEFENDANT is accused of the crime of **CHILD ENDANGERMENT CAUSING BODILY INJURY**, in violation of Section(s) **726.6(1)(a)**, **726.6(3)**, **726.6(6)**,
Code of lowa. For that the said defendant did on or about **March 11**, **2018** in Linn
County and State of lowa,

knowingly act in a manner that created a substantial risk to her minor son, G.T.'s physical, mental or emotional health and safety and causing the child bodily injury by driving a vehicle with the child inside into the freezing waters of the Cedar River at Mohawk Park near the intersection of J Avenue and Longbluff Road NE, Cedar Rapids, Linn County, lowa.

Count 2

THE DEFENDANT is accused of the crime of **CHILD ENDANGERMENT CAUSING BODILY INJURY,** in violation of Section(s) **726.6(1)(a), 726.6(3), 726.6(6),**Code of lowa. For that the said defendant did on or about **March 11, 2018** in Linn
County and State of lowa.

knowingly act in a manner that created a substantial risk to her minor son, M.D.'s physical, mental or emotional health and safety and causing the child bodily injury by driving a vehicle with the child inside into the freezing waters of the Cedar River at Mohawk Park near the intersection of J Avenue and Longbluff Road NE, Cedar Rapids, Linn County, lowa.

I, the undersigned, complainant, being first duly sworn on oath, depose and I believe the above-named defendant committed the above-named public offense based upon the following facts:

Alicia Cole is the mother of minor son, G.T and minor son, M.D. Cole intentionally drove her vehicle into the Cedar River while her two children were passengers. All three subjects were exposed to potential hypothermia and drowning and had to be rescued by boaters that were on the river at the time. M.D. sustained a contusion to his head and G.T. reported abdominal pain as a result of the crash. This occurred at Mohawk Park which is located at J Ave and Longbluff Road NE, Cedar Rapids Iowa 52402.

E-FILED 2018 MAY 30 1:13 PM LINN - CLERK OF DISTRICT COURT

Assistant Linn County Attorney Linn County Courthouse 51 Third Ave Bridge Cedar Rapids IA 52401 (319)892-6350

Fax: (319)892-6389

Rena.Schulte@LinnCounty.org

Subscribed and sworn to before me on May 30, 2018.

Vicki I. Metring Notwini Seal – State of low Commission Number 797189 My Commission Expires 07/14/2019

JVS/vm WARRANT REQUESTED
CEDAR RAPIDS POLICE DEPARTMENT 201803688