

STATE OF WISCONSIN	CIRCUIT COURT	FLORENCE COUNTY
DA Case No.: 2019FR0000056 Assigned DA/ADA: Douglas J Drexler		
STATE OF WISCONSIN	Plaintiff,	
vs.	CRIMINAL COMPLAINT	
MEGAN WILDER 4243 Berry Trail PO Box 153 Long Lake, WI 54542 DOB: 12/15/1980 Sex/Race: F/W Eye Color: Hair Color: Height: ; Weight: ; Alias:		
	Defendant.	

The undersigned complainant, being first duly sworn, states that:

Count 1: MISCONDUCT/OFFICE-ACT/EXCESS AUTHORITY

The above-named defendant on or between, January 01, 2017 through July 31, 2019, in the Town of Long Lake, Florence County, Wisconsin, contrary to sec. 946.12(2), 939.50(3)(i), 973.046(1r), 973.047(1f) Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendant 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 furthermore, invoking the provisions of Wisconsin Statute 973.046(1r), if the court imposes a sentence or places a person on probation, the court shall impose a deoxyribonucleic acid analysis surcharge, calculated as follows: (a) For each conviction for a felony, \$250 (b) For each conviction for a misdemeanor, \$200.

And furthermore, invoking the provisions of Wisconsin Statute 973.047(1f), if the court imposes a sentence or places a person on probation, the court shall require the person to provide a biological specimen to the state crime laboratories for deoxyribonucleic acid analysis. The court shall inform the person that she or she may request expungement under s. 165.77 (4).

Count 2: THEFT - BUSINESS SETTING OVER \$10,000

The above-named defendant on or between, January 01, 2017 through December 31, 2017, in the Town of Long Lake, Florence County, Wisconsin, by virtue of her office, having possession of money having a value greater than \$10,000, of another did use such money without the owner's consent, contrary to the defendant's authority, and with intent to convert the property to her own use, contrary to sec. 943.20(1)(b) and (3)(c), 939.50(3)(g), 973.046(1r), 973.047(1f) Wis. Stats.

Upon conviction for this offense, a Class G Felony, the defendant may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.046(1r), if the court imposes a sentence or places a person on probation, the court shall impose a deoxyribonucleic acid analysis surcharge, calculated as follows: (a) For each conviction for a felony, \$250 (b) For each conviction for a misdemeanor, \$200.

And furthermore, invoking the provisions of Wisconsin Statute 973.047(1f), if the court imposes a sentence or places a person on probation, the court shall require the person to provide a biological specimen to the state crime laboratories for deoxyribonucleic acid analysis. The court shall inform the person that she or she may request expungement under s. 165.77 (4).

Count 3: THEFT - BUSINESS SETTING OVER \$10,000

The above-named defendant on or between, January 01, 2018 through December 31, 2018, in the Town of Long Lake, Florence County, Wisconsin, by virtue of her office, having possession of money having a value greater than \$10,000, of another did use such money without the owner's consent, contrary to the defendant's authority, and with intent to convert the property to her own use, contrary to sec. 943.20(1)(b) and (3)(c), 939.50(3)(g), 973.046(1r), 973.047(1f) Wis. Stats.

Upon conviction for this offense, a Class G Felony, the defendant may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.046(1r), if the court imposes a sentence or places a person on probation, the court shall impose a deoxyribonucleic acid analysis surcharge, calculated as follows: (a) For each conviction for a felony, \$250 (b) For each conviction for a misdemeanor, \$200.

And furthermore, invoking the provisions of Wisconsin Statute 973.047(1f), if the court imposes a sentence or places a person on probation, the court shall require the person to provide a biological specimen to the state crime laboratories for deoxyribonucleic acid analysis. The court shall inform the person that she or she may request expungement under s. 165.77 (4).

Count 4: THEFT - BUSINESS SETTING (>\$10,000 - \$100,000)

The above-named defendant on or between January 01, 2019 through July 31 2019, in the Town of Long Lake, Florence County, Wisconsin, by virtue of her office, having possession of money having a value greater than \$10,000 but does not exceed \$100,000, of another did use such money without the owner's consent, contrary to the defendant's authority, and with intent to convert the property to her own use, contrary to sec. 943.20(1)(b) and (3)(c), 939.50(3)(g), 973.046(1r), 973.047(1f) Wis. Stats.

Upon conviction for this offense, a Class G Felony, the defendant may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.046(1r), if the court imposes a sentence or places a person on probation, the court shall impose a deoxyribonucleic acid

analysis surcharge, calculated as follows: (a) For each conviction for a felony, \$250 (b) For each conviction for a misdemeanor, \$200.

And furthermore, invoking the provisions of Wisconsin Statute 973.047(1f), if the court imposes a sentence or places a person on probation, the court shall require the person to provide a biological specimen to the state crime laboratories for deoxyribonucleic acid analysis. The court shall inform the person that she or she may request expungement under s. 165.77 (4).

PROBABLE CAUSE:

Complainant relies on the official officers' reports which are attached and incorporated by reference. The author is a sworn member of law enforcement. I have worked with the officer before and found him to be truthful and reliable. I believe the reports were generated in the scope of his employment and in the ordinary course of business of law enforcement. I believe the reports are truthful and reliable as records kept in the ordinary course of business. I have used reports of this kind and found them to be truthful and reliable in the past.

Copies of all other pertinent documents are attached to this complaint and incorporated herein as if fully set forth.

Sheriff Dan Miller reports that on 6/20/19 I spoke with Long Lake Town Treasurer Sandy Hodgson. The Town of Long Lake is located in Florence County, State of Wisconsin. Sandy advised that she had found some things in the Town's bank statements that stood out to her. She stated they look like the Town credit cards have been used for personal use by Clerk Megan Wilder.

I advised Sandy that I would have to speak with Town Chairman John Rodaer about this.

I then spoke with John by phone and advised him of this. I also advised him that the Town needs to get the records from the bank and then we could conduct our investigation.

I then spoke with Sandy again and advised her of this and she was going to get the bank records from Great North Bank in Florence. I also went to the bank and spoke with the bank president about this and they will not charge the town for the records.

Sandy Hodgson then brought the bank records in and reviewed them with Deputies Williams and Chrisman.

On 6/26/19 I made arraignments for Town Clerk Megan Wilder to come the Sheriff's Office. At approximately 9:20am I met with her in the conference room of the Sheriff's Office with Deputy Tom Williams. That interview was recorded using Deputy William's body cam. See that recording for full details.

I started the interview by telling Megan that she was not under arrest and that she was free to leave at any time. I advised her that no matter what she tells me today that I will not be taking her into custody. In speaking with Megan, I told her that we were doing an investigation and that I had some questions for her. I told her that I had all the bank records for the last several years and that many items stood out to me. Megan was cooperative and agreed to look through the records with me. I reviewed all of the bank records that we had with Megan going through the items. Megan admitted to using the credit cards for her own personal purchases including paying towards her husband's truck payments, buying numerous craft supplies, buying Tupperware that she is a dealer for, buying girl scout cookies, buying kids clothing, paying off her credit card, and numerous other purchases. See the bank records for full details. I made notes on the bank records with a "M" when Megan admitted to purchasing things for herself.

Megan advised that she was elected to the Town in December of 2016. Megan stated that in about February of 2017 she had credit card access and started using them for her own purchases. Megan admitted to making two large truck payments, using PayPal and Amazon, along with numerous other purchases on the credit cards and debit card. Megan stated that she never used any checks. Megan stated that she does not have any of the credit cards any longer, that she shredded them. I advised Megan that it would be in her best interest if she could produce receipts for things that she bought for the Town that were legitimate purchases. Megan admitted that she knew doing this was wrong and that she bought clothes for her kids and craft supplies among other things, but that she does not have a drug or gambling problem.

At the end of the interview I asked Megan if she still had any of the things that she bought at her residence that were unused and new and she stated that she did. She agreed to turn over these unused items to Deputy Williams. See his report for details on the property.

I then ended the interview with Megan and she left the Sheriff's Office.

FOLLOW-UP: I have spoken with the DA about this case, along with members of the Town Board and bank. I have advised John Rodaer that they need to get the credit cards cancelled along with getting the most recent credit card statements.

I also spoke with Megan on 7/10/19 and she gave me her email addresses that she uses.

I turned over all of the bank statements to the DA's office along with Megan's information so a search warrant could be drafted for Amazon and PayPal. I also spoke with Sandy Hodgson and advised her to find out when the Town had a new fuel tank delivered because that date is important. Fire Chief Kevin Haag believes that he turned his credit card into Megan around that time.

FOLLOW UP INVESTIGATION IN REGARDS TO WILDER

Sheriff Miller informed me that Megan Wilder did come to our office and Sheriff Miller and Deputy Williams conducted the interview. See Millers narrative. The interview was both audio and visually recorded. In the interview Wilder admits to purchasing items that were not approved under town business as the Town of Long Lake Clerk.

I added up the totals of all charges that Wilder admitted to and others that she could not verify with receipts for the year 2019. Those totals were \$26,341.34. The town used a debit card through their bank, Great North Bank. The town also had issued 3 credit cards with personal names one to Megan Wilder, William Streu, and Kevin Haag. 5 other credit cards that were labeled Long Lake Fire Department 1,2,3 and Long Lake Highway 1 and 2.

There were several suspicious charges not only to the debit card, but all of the cards. We then contacted Streu, Haag and Rodaer to come to our office to verify what they could for the charges.

CONTACT WITH WILLIAM STREU

Streu spoke with Deputy Williams and did not give any permission to anyone, Wilder, to use the credit card to purchase anything outside of town business. Charges that were described to Streu on his the card in his name, he did not know anything about. Deputy Williams added up amounts of suspicious charges and/or charges Wilder admitted were hers. Total sum for 2018 is \$16,488.11. Grand total for both years of fraudulent/suspicious charges **\$42,829.45**.

CONTACT WITH JOHN RODAER AND DALE RITCHIE

Sheriff Miller, Deputy Williams and I sat down with Rodaer and advised him of the sum of the totals in which we were investigating in regards to Wilder. Rodaer stated that he did not give her anyone permission to purchase anything outside of town business. Dale Ritchie also arrived and we all spoke about the lack of "checks and balances". If the purchases were not on the town vouchers in which Megan provided, they knew nothing about them. They asked other questions in regards to Wilder resigning and how they go about getting her off of all accounts. We also requested the town supervisors and board attempt to locate all receipts to show which purchases are indeed legitimate.



CONTACT WITH KEVIN HAAG

Sheriff Miller and I spoke with Kevin Haag. Haag was able to provide receipts for the 3 times he used the credit card which was in his name. Haag stated that Wilder was in charge of all of the cards. He stated that the 3 fire department cards were left in the visor of the fire trucks for gas. He believes it was over a year ago that the town obtained a fuel tank and credit cards were no longer needed. Haag stated he handed in his credit car at least a year ago as well. Haag stated that they were all put in Wilders mailbox. When speaking with Ritchie, Hodgson and Rodaer they all believed the cards to no longer be in use. All of these credit cards were still being used in 2019, most recent as June. Most of the cards have a past due balance.

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

Subscribed and sworn to before me on 08/01/19

Electronically Signed By:

Douglas J Drexler

District Attorney

State Bar #: 1012319

Electronically Signed By:

Sheriff Dan Miller

Complainant