

FILED
12-18-2018
Circuit Court
Waushara County WI
2018CF000271

STATE OF WISCONSIN CIRCUIT COURT WAUSHARA COUNTY

STATE OF WISCONSIN
Plaintiff,

DA Case No.: 2018WS001360
Assigned DA/ADA: Steven P. Anderson
Agency Case No.:

vs.

Court Case No.:

ALEJANDRO HUMBERTO BANDA-
SEGUNDO

CRIMINAL COMPLAINT

226 S East St
Plainfield, WI 54966

DOB: 10/02/1987

Sex/Race: M/W

Eye Color: Brown

Hair Color: Black

Height: 5 ft 5 in

Weight: 230 lbs

Alias: Also Known As Humberto A

Banda Segundo

Defendant.

For Official Use

Deputy Daniel Struzynski

Deputy Gary Grenier

Deputy Douglas Christensen

Deputy Aaron Kumferman

Investigator John Wiesmueller, being first duly sworn, affies and states as follows that:

Count 1: FRAUD/RENDERING INCOME TAX RETURN OR OBTAIN REFUND WITH FRAUDULENT INTENT

The above-named defendant on or about Friday, **February 10, 2017**, in the Village of Plainfield, Waushara County, Wisconsin, did render a false or fraudulent income tax return with intent to defeat or evade any assessment required by this chapter, or to obtain a refund or credit with fraudulent intent, contrary to sec. 71.83(2)(b)1, 939.50(3)(h) 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.

Count 2: FRAUD/RENDERING INCOME TAX RETURN OR OBTAIN REFUND WITH FRAUDULENT INTENT

The above-named defendant on or about Friday, **February 09, 2018**, in the Village of Plainfield, Waushara County, Wisconsin, did render a false or fraudulent income tax return with intent to defeat or evade any assessment required by this chapter, or to obtain a refund or credit with fraudulent intent, contrary to sec. 71.83(2)(b)1, 939.50(3)(h) 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.

PROBABLE CAUSE: See law enforcement reports attached hereto and made a part hereof.

1) Your affiant, a sworn law enforcement officer with the Waushara County Sheriff's Department has read and reviewed the official law enforcement reports prepared by **Detective Nate Klapoetke** of the **Waushara County Sheriff's Department** and **Special Agent Lisa**

Kennedy of the Wisconsin Department of Revenue, whom your complainant believes to be accurate and reliable, based upon past professional experience, and with said reports having been prepared, filed, and maintained during the ordinary course of business of said law enforcement agency.

2) Detective Klapoetke reports:

On 05-30-2018 at approx 1855 Hrs I Det. Sgt. Klapoetke along with Sgt. Wenzel and Deputies Hanneman and Strobusch executed a drug search warrant at 226 S East St in the Village of Plainfield, Waushara County, WI. Also present was Special Agent Mike Austin with the Dept of Revenue, Plainfield PD Chief Fenske, two members from the WI State Patrol and numerous investigators from the Central WI Drug Task Force.

Prior to executing the warrant Chief Fenske advised me that Alejandro Humberto Banda Segundo M/H DOB 10-02-1987 was operating a yellow Dodge Ram truck in Plainfield. Chief Fenske advised Alejandro was now home at 226 S East St in Plainfield.

I knocked on the front main(west) entrance door announcing LE presence and stated that we had a search warrant. Alejandro came to the door. Alejandro was detained. I along with other LE officers cleared the residence. Located inside was Jasmin NMI Banda F/H DOB 05-01-1990 and two young children(names are attached to involvement's).

I went outside and introduced myself to Alejandro. I advised him that we were serving a drug search warrant and I provided a copy of the warrant to Alejandro. Special Agent Austin also had a warrant for the residence for a Revenue/Tax investigation.

I advised Alejandro that he did NOT have to cooperate or speak with us. I advised Alejandro that K9 Thor was on scene and was going to conduct a sniff and may scratch or bite items related to illegal drugs. Alejandro told me that he smokes Marijuana and that he had a small amount of Marijuana and Cocaine in his garage. He described the amount of drugs as being small and only a few grams. Alejandro led me to the yellow Dodge Ram truck in the driveway and pointed out a key to the locked garage. Alejandro was ultimately transported to the jail on an investigative hold.

Deputy Strobusch began to take photos. Sgt. Wenzel and K9 Thor were conducting a sniff of the residence and property. Sgt. Wenzel advised that K9 Thor indicated in the main floor bedroom as well as on a tool box in the detached garage that was located on the east wall of the garage. The following items were located in the search:

Detached Garage

Snap On large tool box east wall

Located in the top pull out drawer was numerous tools. One of the tools was labeled "BETO"(it should be noted that Alejandro has a tattoo on his neck with name "BETO"). Located amongst the tools was a plastic Tupperware type container with a lid that contained a very large amount of suspected Cocaine in chunk form that appeared to be cut off a brick or Kilo. There was a strong odor of Cocaine upon taking off the lid.

Located in the same drawer was a clear plastic gem style ziplock baggie containing a white powder substance believed to be Cocaine. This baggie was similar to the baggies of Cocaine Garrett Sparkman sold to LE in 18WS01449. Also located in the same drawer was a bottle of Inositol Powder which is

commonly used by Cocaine dealers to cut the pure(brick) cocaine to add more weight thus making more Cocaine available to sell.

In the same tool box located in a bottom left drawer was another Tupperware type plastic container which had a thick layer of Cocaine residue and a small amount of Cocaine powder/chunk on the bottom of the container. This container also smelled of Cocaine.

Located on top of the tool box was a soft case Milwaukee brand tool bag. Inside the bag was a large bottle of Magnesium Inositol again used as a cutting agent by Cocaine dealers. Also located in the same bag was numerous empty gem style baggies used for packaging controlled substances.

Located along the north wall in the garage was a speaker box. Inside the speaker box was a digital scale that when turned on activated and was in working order. There was a small amount of white residue on the scale.

Located on a table in the garage near the side entry door was identifiers for Alejandro including a Chase banking document for Alejandro H Banda 226 S East St Plainfield, WI. The Chase document had account number and listed a phone number for Alejandro of 920-647-6661. There was also a Social Security document with name Alejandro Humberto Banda Segundo DOB 10-2-1987 226 S East St Plainfield, WI Social Security number with phone number 920-647-6661.

Also in the garage near the entry door inside a plastic shopping bag on top of a pink tote was a Food Saver Vacuumed sealed bag which contained (4) separate baggies of suspected Marijuana. The baggies were labeled with Marijuana strains like "Jet Fuel", "Zookies", "Blue Dream" and "ATF".

More identifiers in the garage was an envelope with a letter from the Waushara County Treasurer addressed to Mr. Alejandro H Banda Segundo 226 S East St Plainfield, WI. There was also a Real Estate Transfer Form located with the letter behind the side entry door to the garage.

Located in the north west corner of the garage was a loose chunk of Marijuana. Located along the east wall was a "whey protein" supplement bottle that contained various plastic baggies for packaging along with a sandwich baggie of suspected Marijuana.

Located in the garage on top of the Snap On tool kit was a digital scale brand AWS with white residue on it.

Deputy Hanneman gave me a black wallet that was found in a pocket on Alejandro's person. Numerous credit/debit cards were located in the wallet for Alejandro. There was \$1,100 dollars located in the wallet and \$250 dollars located outside the wallet in Alejandro's pocket.

Master Bathroom main floor

A US Cellular flip style cell phone, thumb drive and multi color glass Marijuana pipe was located in the bathroom.

Master bedroom main floor south west

(2) cameras, a notebook with numbered entries and a multi color glass Marijuana pipe was located in the bedroom. This bedroom clearly belonged to Alejandro and Jasmin.

Kitchen

(200) empty small plastic square style ziplock style gem baggies commonly used

to package drugs were located in the kitchen. These baggies were identical to the baggies of Cocaine purchased from Garrett Sparkman in 18WS01449. (It should be noted I did not see anything else packaged in these baggies except Cocaine at the residence).

I was advised that Special Agent Austin took numerous items of evidence including but not limited to cell phones, financial paperwork/documents etc.

Located in the driveway was the following vehicles all registered to Alejandro.

2013 Chevy Malibu WI license plate 305WJC

2006 Chrysler 300 WI license plate 443YMC (30 Tramadol pills in blister packs were located in the vehicle)

2005 Dodge Ram WI license plate MB6655 (vehicle Alejandro was operating which also contained 2 cell phones belonging to Alejandro and garage key)

2017 Dodge Ram WI license plate LW9773.

Numerous financial records were located in these vehicle that Special Agent Austin took as evidence. All four vehicles were towed by Area Wide towing to the Sheriff's Office impound for possible seizure.

The upstairs consisted of juvenile children's bedrooms. The rest of the property was searched and nothing further of evidentiary value was located.

I did contact via phone Waushara County Human Services and spoke with Adam S. I advised him on the nature of the drug case and provided all the names of the children and adults who live at the home which consisted of Alejandro, Jasmin and 4 juvenile children.

I advised other Waushara Deputies to respond to Garrett Sparkman's residence and take Garrett A Sparkman M/W DOB 11-19-2000 and Kaylee L Laschiava F/W DOB 7-28-2000 into custody for their roles in Cocaine delivery reference 18WS01449. I was later advised that both Garrett and Kaylee were in custody and drugs were located at Garrett's house.

All evidence was secured. Special Agent Austin and myself spoke with Jasmin Banda at the kitchen table. Jasmin was not in handcuffs and was very cooperative. I told Jasmin that she did not have to speak with me. I told Jasmin that she was NOT going to be arrested and she would be staying at the residence as I did not believe she was involved in any illegal activity. Jasmin indicated she was willing to provide a statement.

Taped Statement Jasmin Banda

In summary Jasmin identified herself, her address and the fact she lives at the house with Alejandro and her 4 children. Jasmin said she is a stay home mother mostly and Alejandro works full time in Waupaca. Jasmin said Alejandro owns 3 properties and may have bought another. She does not agree with the purchases as it adds more stress. Jasmin indicated that Alejandro pays all the bills and she stays out of the finances as he is the one who works. Jasmin indicated that all the vehicles that were in the driveway belong to Alejandro. Jasmin indicated that Alejandro sold a truck to a white male younger individual who was short and skinny (Garrett Sparkman). Jasmin indicated that Alejandro works full time 40 hours a week. Jasmin said that Alejandro used to smoke Marijuana however she has not seen him smoke since last summer. Jasmin said the tools in the garage all belong to Alejandro. Jasmin described (Garrett) as seeing Alejandro once or twice a month at her house. Jasmin said she has not known Alejandro to use any other drugs and is not aware he has ever sold drugs.

Jasmin said all the firearms in the house belong to Alejandro. Jasmin did not know where the Tramadol pills came from. Jasmin said Alejandro was in control of the keys for the garage. Jasmin said Alejandro is in control of the money.

Jasmin said she has not worked for several years. Jasmin described numerous credit cards she and Alejandro have to Special Agent Austin. Jasmin advised they owned their home however still make payments on the home. Jasmin said they are on Badger Care for medical assistance and used to be on food stamps however the food stamp benefits were stopped last year. Jasmin advised that Alejandro sent \$5,000 dollars to Mexico to his grandmother to open up a store in Mexico in 2017 or 2018. Jasmin advised that Alejandro sends money to Mexico approx 5 times a year in various unknown amounts.

Jasmin indicated that Alejandro has two cell phones one being an Apple I Phone and the other phone has an orange case. Jasmin indicated that we were nice to her. Jasmin said we did not trick her and she gave us the statement voluntarily.

We then left the residence and I transported the evidence to the Sheriff's Office.

Interview with Kaylee Laschiava

On 05-30-2018 at approx 2145 Hrs I along with S/A Austin interviewed Kaylee at the Sheriff's Office in an audio/video recorded room. I read Kaylee Miranda and the Waiver and she agreed to provide a statement. She printed and signed the form. In summary she identified herself and advised she is a friend of Garrett Sparkman and resides with him for the last 3 months. She said that both her and Garrett purchased a 2001 Silverado truck. She said they bought the vehicle from a private party in Plainfield(Alejandro). Kaylee said that she frequently would ride around with Garrett in the truck. Kaylee said Garrett sold Cocaine to two different customers once every 2 weeks in Wautoma and Plainfield for the last 1-2 months. Kaylee said Garrett's Cocaine source lives in Plainfield and goes by the name "B". Kaylee said Garrett and the Cocaine source contact each other via texts, calls and Facebook.

Kaylee said she has rode with Garrett 1-2 times to obtain Cocaine in the last month. Kaylee described Garrett's Cocaine source as a house in Plainfield. She said there was a old Chevy Silverado dark blue truck at the source's house possibly a 1970's. She said there was also a green truck in the driveway. Kaylee said Garrett would meet the Cocaine source in the garage. She described the house as being to the left of the garage and the garage is straight ahead when you pull into the driveway. She also said there was a 4 door Chevy car in the driveway tan in color. Kaylee described a lime green newer truck in the driveway that looks brand new. Kaylee said that Garrett calls the cocaine source "Daddy". Kaylee said the Silverado they bought was from the source house.(Kaylee is clearly describing 226 S East St Plainfield and Alejandro's vehicles).

Kaylee was brought back to the jail and later released from the investigative hold with a referral to the DA Office for her involvement in 18WS01449.

Interview with Garrett Sparkman

On 05-30-2018 at approx 2230 Hrs I along with S/A Austin interviewed Garrett in an audio/video recorded room at the Sheriff's Office. I read Garrett the Miranda and Waiver. Garrett wished to provide a statement. Garrett signed the form. In summary Garrett identified himself and provided a phone number of 715-935-0557. Garrett said he had a black Trac Phone. Garrett said he lived with Kaylee and had a 2001 Silverado he bought from a buddy. Garrett said he bought the truck from a Mexican in Plainfield. Garrett said the name of the Mexican he purchased the truck from was on the registration and he recently

changed the registration over to his name. Garrett said he paid approx \$1,700 for the truck. Garrett described the individual he bought the truck from as "Berto" and said he has been to "Berto's" house numerous times. Garrett indicated "Berto" owns an apartment building Garrett's brother lives in. Garrett described "Berto" house as a big white house. "Berto" was described as a Hispanic male heavy set approx 30 years old with a wife and kids. Garrett said "Berto" has a garage with a lot of tools inside it. Garrett also indicated there was a tool box inside the garage. Garrett said "Berto" had a yellow truck and newer Lime green truck.

Garrett denied selling Cocaine. Garrett then said that he did sell baking soda that he portrayed to be Cocaine. Garrett then indicated that there was some Cocaine mixed in with the baking soda. Garrett said he did meet a guy in a black truck 5-6 times within the last year to sell Cocaine and referenced the Dollar General store in Plainfield. Garrett said he gets his Cocaine in Plainfield from a Hispanic male with a little beard. Garrett then ultimately indicated that his cocaine source was "Berto" and he has purchased cocaine from "Berto" a couple dozen times. Garrett said 3 balls of Cocaine was \$900 dollars. Garrett would get \$200 and "Berto" would get \$700. Garrett said "Berto" was the same guy he bought the truck from. Garrett said he would purchase Cocaine a couple times a month at Berto's house. I did show Garrett a WI DOT photo of Alejandro Humberto Banda Segundo and Garrett did advise that was his Cocaine source.

Garrett did allow LE to search his cell phone. Garrett did sign a consent to search mobile device form. This was signed at 2320 Hrs. I did give this phone to Det. Sgt. Lietz on 05-31-2018. Lietz did download the phone and put the contents of the download on a thumb drive.

Garrett was brought back to the jail.

Interview with Alejandro Humberto Banda Segundo

On 05-30-2018 at approx 2332 Hrs I along with S/A Austin did interview Alejandro in an audio/video recorded room at the Sheriff's Office. I read Miranda and the Waiver and Alejandro wished to provided a statement. He printed and signed the form. In summary Alejandro identified himself and his residence of 226 S East St in Plainfield. He provided one of his cell phone numbers as 715-498-3165. He described his 2 cell phones which were located in the yellow Dodge truck. We talked about the tattoo on his neck which read "Beto JR". We talked about his finances including vehicle payments, employment and property that he owns. Alejandro indicated that some people call him "Beto". Alejandro indicated that he has transferred money to Mexico approx twice last year to his grandmother. Alejandro indicated he locks his garage because he had tools stolen in the past. He said all the tools in the garage belong to him. Alejandro said the tool box in the garage belonged to him.

Alejandro said the Marijuana that was in the garage was his and described it as being a couple "Bowls" worth. Alejandro said he smokes Marijuana about once a month. Alejandro indicated the Cocaine in the tool box was his and was a couple grams. Alejandro said he uses cocaine every other day. I asked him about the scales in the garage and he indicated they are used to weight stuff. Alejandro did not want to answer questions about selling cocaine. Alejandro said the Marijuana pipe in the bedroom was his. Alejandro did not want to answer questions about the numerous baggies located during the search.

Alejandro indicated the cash he had on his person was in part from the child tax credit. He mentioned other payment being from Garrett for payment on the truck Alejandro sold to Garrett. Alejandro indicated he recently paid \$3,500 as part of a rent to own deal with the old Hardware store downtown that he wanted to turn into a laundry mat. Alejandro indicated he would "Hook" someone up with weed if they smoked with him.

Approx 80% of the way through the interview by digital audio recorder was full due to the number of interviews on this case and the length of the interviews. The audio/video room was still recording. I asked for consent to search his cell phones and he indicated he would want to refer to a lawyer on that topic. He did indicate that 90% of his money was legal money indicating to me that some was from illegal means.

Alejandro was brought back to jail.

On 05-31-2018 I photographed the evidence and processed it. The following is a list of drug evidence:

2/10 gram Cocaine Tupperware container in tool box in garage bottom left drawer

63 grams Cocaine Tupperware container in tool box in garage top drawer. FIELD TEST POSITIVE FOR PRESENCE OF COCAINE. This is the weight of the cocaine only.

13 grams Cocaine in plastic baggie in tool box in garage top drawer. FIELD TEST POSITIVE FOR PRESENCE OF COCAINE.

Inositol Powder top drawer tool box in garage 80 grams

Magnesium Inositol powder in soft Milwaukee tool kit on top of tool box in garage 511 grams

Digital scale with residue in speaker box in garage

Food Saver Bag containing 4 types of different Marijuana strains "Jet Fuel" 8/10 gram, "Zookies" 3.5 grams, "Blue Dream" 1.3 grams and "ATF" 9/10 gram. I received a POSITIVE FIELD TEST FOR PRESENCE OF THC FROM "ATF" sample.

9/10 gram of THC loose in garage

2 grams THC in baggie in whey protein container in garage

Digital AWS brand scale in garage with residue in garage on top of Snap on tool kit.

2 multi color glass Marijuana pipes located in bedroom and bathroom main floor.

30 suspected 50 mg Tramadol pills located in Chrysler 300 in driveway

200 gem baggies in kitchen

TOTAL COCAINE WEIGHT AT SEARCH WARRANT 76.2 GRAMS. TOTAL MARIJUANA WEIGHT 9.4 GRAMS.

Requesting charges on Alejandro Humberto Banda Segundo of Possession with Intent to Deliver Cocaine over 40 grams, Maintaining a Drug House, Possession of THC, Possession of Illegally obtained Prescription and Possession of Drug Paraphernalia for the search warrant in 18WS03613. Additional 2 charges of Delivery of Cocaine in 18WS01449 for incidents on 3-5-18 and 5-21-18 in the Village of Plainfield. End of report.

3) Special Agent Lisa Kennedy of the Wisconsin Department of Revenue reports that she was tasked with investigating Alejandro Banda-Segundo's financial structure to ascertain whether he accurately reported income to the Wisconsin Department of Revue as part of his annual tax filings. Specifically, a review of Banda-Segundo's financial structure was undertaken to ascertain whether he may have falsified his income tax returns for calendar

years 2016 and 2017. Your affiant is aware that Wisconsin Statute 71.83(2)(b)1 makes it a crime for an individual to file a false income tax return with intent to defeat or evade a tax assessment. After a comprehensive review of Banda-Segundo's finances, Agent Kennedy reports that she is recommending charges be issued against Banda-Segundo for the years 2016 and 2017.

4) Agent Kennedy based this recommendation as Banda-Segundo only reported income from his employers, an IRA distribution and rental income. He failed to report any income from construction work, painting cars or drug sales. By failing to report this income, Banda-Segundo received a larger refund than he was entitled to for 2016 and 2017.

5) Agent Kennedy reports that for the **tax year 2016**, Banda-Segundo filed a married filing joint Wisconsin income tax return on **February 10, 2017**. In that tax filing, Banda-Segundo reported wage income of \$32,065, rental property earnings of \$10,000, a taxable IRA distribution of \$6,000 and a rental loss of (\$2,941), for a total of \$48,065 of available income during the year 2016. However, a significant review was undertaken of Banda-Segundo's finances including a review of his bank records which indicated that for the calendar year 2016 the cash flowing out of Banda-Segundo's accounts were approximately \$2,786 beyond the \$48,065 in taxable income that he reported. Agent Kennedy reports that this amount is likely much higher as cash was likely used for several day to day purchases and was not included as part of her investigation. This underreporting was an effort to defeat or evade assessment of cash from his purported business selling cocaine, as well as other side jobs that he failed to report. A review of the records indicate that Banda-Segundo claimed a Wisconsin earned income credit of \$1,316 and received a refund from the Wisconsin Department of Revenue in the amount of \$1,909.

6) Agent Kennedy reports that for the **tax year 2017**, Banda-Segundo filed a married filing joint Wisconsin income tax return on **February 9, 2018**. In that tax filing, Banda-Segundo reported wage income of \$20,986, rental property earnings of \$13,500, a taxable IRA distribution of \$153 and a rental profit of \$997, for a total of \$34,639 of available income during the year 2017. However, a significant review was undertaken of Banda-Segundo's finances including a review of bank records which indicated that for the calendar year 2017 the cash flowing out of Banda-Segundo's accounts were approximately \$18,382 beyond the \$34,639 in taxable income that he reported. Agent Kennedy reports again that this amount is likely much higher as cash was likely used for several day to day purchases and was not included as part of her investigation. This underreporting was an effort to defeat or evade assessment of cash from his purported business selling cocaine, as well as other side jobs that he failed to report. A review of the records indicate that Banda-Segundo claimed a Wisconsin earned income credit of \$2,148 and received a refund from the Wisconsin Department of Revenue in the amount of \$3,021.

7) Agent Kennedy reports she reviewed the interview of Alejandro Banda-Segundo conducted by Detective Klapoetke and Special Agent Austin on May 30, 2018. During that interview, Banda-Segundo indicated that he had two cell phone. He had a wife and four children under the age of twelve living at the home. Banda-Segundo indicated he had lived at his house for approximately nine years and was still making payments on it. He said that the Chevy Malibu, two Dodge Ram trucks, and the Chrysler 300 were his. He said he was still making payments on the two trucks and the Malibu. Banda-Segundo said he worked at Automated Machine in Waupaca and had worked there since he was eighteen years old and makes approximately \$15-16 per hour with bonuses. He said he owns rental properties, a single family home and a 4-plex apartment complex. Banda-Segundo said he sometimes

sends money to his grandmother in Mexico. Banda-Segundo said he did construction work on the side. He estimated making about \$15,000 a year doing construction side jobs. He also estimated making \$2,500 a year painting cars and \$1,200 a year from fixing cars.

8) Agent Kennedy reports that a review of Banda-Segundo's records indicate that he was spending more than he was reporting as income. She reports that it is very likely that Banda-Segundo used cash to pay for many of the day to day expenses, as a review of the financial records found very little payments for food, despite Banda-Segundo having a stay at home wife and four children at the home. Agent Kennedy found potential food expenditures for the years 2016 and 2017 to be \$3,902 and 782 respectively, way below what would be necessary for a family of six. Agent Kennedy also noted that in addition to grocery store purchases, there were not many payments to phone companies and Banda-Segundo said he had two cell phones. Agent Kennedy reports that Banda-Segundo admitted during his interview that he made money in addition to his wage and rental income that was not reported on his tax returns. Agent Kennedy notes that evidence also indicates that Banda-Segundo was earning money from the sale of cocaine that was not reported as income on his tax returns. During the interview of co-conspirator, Garrett Sparkman, Sparkman admitted to buying cocaine from Banda-Segundo and said he kept a portion of the sales and a larger portion of the sales went to Banda-Segundo.

9) Agent Kennedy reports that based on Banda-Segundo's income tax returns and the expenditures from financial documents, Banda-Segundo failed to report income of \$2,786 in 2016 and \$18,382 in 2017. Agent Kennedy notes that these figures are very conservative figures as they don't include money from any of the cash side work that he admitted to doing and also doesn't include any more earned from selling drugs.

10) Agent Kennedy reports she is of the belief that Banda-Segundo intentionally filed fraudulent Wisconsin income tax returns to obtain larger refunds than he was entitled to. Agent Kennedy reports that venue is proper in Waushara County under Wis. Stats. 71.80(6m) as Banda-Segundo resides at the residence located at 226 S. East St., in the Village of Plainfield, Waushara County, Wisconsin.

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

Subscribed and sworn to before me on
12/18/18
Electronically Signed By:
Steven P. Anderson
District Attorney
State Bar #: 1090034

Electronically Signed By:
Deputy Douglas Christensen
Complainant