

FILED
09-11-2020
Clerk of Circuit Court
Winnebago County, WI
2020CF000577
Honorable Scott C Woldt
Branch 2

STATE OF WISCONSIN	CIRCUIT COURT	WINNEBAGO COUNTY
STATE OF WISCONSIN Plaintiff,	DOJ Case No.: 2019-01323 Assigned AAG: Daniel P. Lennington Agency Case No.: 19-429 Court Case No.: 2020 CF	
vs.		
TERRY LYNN CULVER 5509 Fisk Avenue Oshkosh, Wisconsin 54904 DOB: 08/03/1958 Sex/Race: M/W Defendant.		SUMMONS

For Official Use

THE STATE OF WISCONSIN TO SAID DEFENDANT:

The Complaint, a copy of which is attached, having been made before me accuses the Defendant of the following crimes:

Count 1: THEFT – BUSINESS SETTING OVER \$100,000

The Defendant, from on or about April 1, 2013, through on or about December 31, 2018, in Winnebago County, Wisconsin, by virtue of being a trustee or bailee, and having possession of money, negotiable instruments, papers, securities, or writings having a value greater than \$100,000 of another, did conceal, retain possession of, transfer, or use such money, negotiable instruments, papers, securities, or writings without the owner's consent, contrary to his authority, and with intent to convert the property to his own use or the use of another, contrary to Wis. Stat. §§ 943.20(1)(b) and (3)(cm), 939.50(3)(f), and 971.36(3), a Class F felony, and upon conviction may be fined not more than twenty-five thousand dollars (\$25,000) or imprisonment not to exceed twelve (12) years and six (6) months, or both.

Count 2: FRAUD/RENDERING INCOME TAX RETURN

The Defendant, on or about September 1, 2015, in Winnebago County, Wisconsin, did render a false or fraudulent income tax return with intent to defeat or evade any assessment required by Wis. Stat. ch. 78, or to obtain a refund or credit with fraudulent intent, contrary to Wis. Stat. §§ 71.83(2)(b)1. and 939.50(3)(h), 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 3: FRAUD/RENDERING INCOME TAX RETURN

The Defendant, on or about April 16, 2016, in Winnebago County, Wisconsin, did render a false or fraudulent income tax return with intent to defeat or evade any assessment required by Wis. Stat. ch. 78, or to obtain a refund or credit with fraudulent intent, contrary to Wis. Stat. §§ 71.83(2)(b)1. and 939.50(3)(h), 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 4: FRAUD/RENDERING INCOME TAX RETURN

The Defendant, on or about March 13, 2017, in Winnebago County, Wisconsin, did render a false or fraudulent income tax return with intent to defeat or evade any assessment required by Wis. Stat. ch. 78, or to obtain a refund or credit with fraudulent intent, contrary to Wis. Stat. §§ 71.83(2)(b)1. and 939.50(3)(h), 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 5: FRAUD/RENDERING INCOME TAX RETURN

The Defendant, on or about March 16, 2018, in Winnebago County, Wisconsin, did render a false or fraudulent income tax return with intent to defeat or evade any assessment required by Wis. Stat. ch. 78, or to obtain a refund or credit with fraudulent intent, contrary to Wis. Stat. §§ 71.83(2)(b)1. and 939.50(3)(h), 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 6: FRAUD/RENDERING INCOME TAX RETURN

The Defendant, on or about April 9, 2019, in Winnebago County, Wisconsin, did render a false or fraudulent income tax return with intent to defeat or evade any assessment required by Wis. Stat. ch. 78, or to obtain a refund or credit with fraudulent intent, contrary to Wis. Stat. §§ 71.83(2)(b)1. and 939.50(3)(h), 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.

You, Terry Lynn Culver, are, therefore, summoned to appear in room 150 at the Winnebago County Courthouse, located at 415 Jackson Street, Oshkosh, Wisconsin 54901, in front of Winnebago County Circuit Court Commissioner Bryan Keberlein, to answer said Complaint, **on Monday, the 12th day of October, at 9:00 A.M.**

IF YOU FAIL TO APPEAR, A WARRANT FOR YOUR ARREST MAY BE ISSUED.

Dated this 11th day of September, 2020

Electronically signed by:

s/ Daniel P. Lennington
DANIEL P. LENNINGTON
Assistant Attorney General
State Bar #1088694

Attorney for the State of Wisconsin

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STATE OF WISCONSIN	CIRCUIT COURT	WINNEBAGO COUNTY
STATE OF WISCONSIN	Plaintiff,	DOJ Case No.: 2019-01323 Assigned AAG: Daniel P. Lennington Agency Case No.: 19-429 Court Case No.: 2020 CF
vs.		
TERRY LYNN CULVER 5509 Fisk Avenue Oshkosh, Wisconsin 54904 DOB: 08/03/1958 Sex/Race: M/W	Defendant.	CRIMINAL COMPLAINT
		<i>For Official Use</i>

The undersigned, of the State of Wisconsin Department of Justice, being first duly sworn, states that:

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Count 5: FRAUD/RENDERING INCOME TAX RETURN

The Defendant, on or about March 16, 2018, in Winnebago County, Wisconsin, did render a false or fraudulent income tax return with intent to defeat or evade any assessment required by Wis. Stat. ch. 78, or to obtain a refund or credit with fraudulent intent, contrary to Wis. Stat. §§ 71.83(2)(b)1. and 939.50(3)(h), 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 6: FRAUD/RENDERING INCOME TAX RETURN

The Defendant, on or about April 9, 2019, in Winnebago County, Wisconsin, did render a false or fraudulent income tax return with intent to defeat or evade any assessment required by Wis. Stat. ch. 78, or to obtain a refund or credit with fraudulent intent, contrary to Wis. Stat. §§ 71.83(2)(b)1. and 939.50(3)(h), 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.

FACTUAL BASIS:

I, the Complainant, Loreen Glaman, am a Special Agent (S/A) with the Division of Criminal Investigation at the Wisconsin Department of Justice and base this Complaint upon my own investigation, relying upon my training and experience. My investigation included statements from the victim, from witnesses, from taxpayers and from the Defendant. Incriminating statements from the Defendant are presumed truthful and reliable as statements against his penal interests. Statements from taxpayers are believed to be truthful and reliable as are statements from victims and witnesses to a crime. I have also reviewed records kept in the ordinary course of business or government operations, including records from financial institutions and government agencies, which I have found to be reliable in the past. I also base this Complaint on the investigation of Special Agent Lisa Kennedy of the Wisconsin Department of Revenue. Based on my experience and training, I find reports of the Wisconsin Department of Revenue to be truthful, reliable, and thorough. Therefore, based upon information and belief, I state the following:

Count 1

1. In January 2019, the Wisconsin Department of Justice, Division of Criminal Investigation (DOJ, DCI) opened an investigation based on a complaint that Terry L. Culver had stolen funds from Victim A, DOB: 5/15/1928. According to records provided by Witness 1 — an Adult Protective Services (APS) Social Worker in Winnebago County — between 2013 and 2018, Terry Culver utilized more than \$425,000 in Victim A's money through "loans" to himself and to his business, through "cash" payable checks endorsed by him, through checks for home improvement items, by the purchase of a 2016 Chevrolet Impala, through vehicle expenses, by the purchase of appliances, by the purchase of furniture, and by the purchase of various other personal items. In 2016, Terry Culver and his wife, Jill Culver, took possession of Victim A's home through a Quit Claim Deed. Through the statements of Witness 1 and documents related to APS's investigation of Victim A's history, I learned the following details supporting the charges above:
2. Victim A lived in Town of Utica near Oshkosh, Wisconsin. For several years preceding the events described in this Complaint, Terry Culver took care of her lawn and snow removal. In February 2013, Victim A was placed in a nursing facility and never returned to her home.
3. On March 27, 2013, Victim A signed a Power of Attorney (POA) form in Winnebago County, Wisconsin. The form named Terry Culver as her POA; at this time, Victim A had no immediate family available to assume these duties. Terry Culver signed an acknowledgment, indicating he understood his duties. According to the document, he was required to fulfill certain duties under Wis. Stat. §§ 244.14(1) and 244.14(2), including but not limited to the following: (a) act in accordance with the principal's reasonable expectations to the extent actually known by the agent

and, if those expectations are not known, in the principal's best interest; (b) act loyally for the principal's benefit; (c) act so as not to create a conflict of interest that impairs the agent's ability to act impartially in the principal's best interest; (d) act with the care, competence, and diligence ordinarily exercised by agents in similar circumstances; (e) keep a record of all receipts, disbursements, and transactions made on behalf of the principal.

4. On May 15, 2013, Terry Culver sold Victim A's lake front property on Pearl Lake, Waushara County, Wisconsin. According to the title documents, the property was sold for \$212,500, with a balance due to seller of \$195,904.87. Terry Culver was listed as seller, "as Power of Attorney for" Victim A. A deposit in this amount was deposited into Victim A's US Bank checking account on May 15, 2013. On June 19, 2013, \$150,000 was transferred from Victim A's US Bank checking account into Victim A's US Bank savings account.
5. On July 10, 2013, the Winnebago County Department of Health Services noted that Victim A would not be returning to her home, and that she would be staying at a health care facility. DHS records indicate that Terry Culver stated he would be renting property from Victim A. My examination of the US Bank records identified no regular "rent" payments made by Terry Culver after 2014.
6. On November 21, 2014, Terry and Jill Culver's residence, 2110 Elo Road, Picket, Wisconsin 54964, was foreclosed. Terry and Jill Culver moved into Victim A's home. Records from the Wisconsin Department of Transportation verify that 5509 Fisk Avenue, Oshkosh, Wisconsin was the Culvers' address as of July 21, 2014.
7. On January 19, 2016, Victim A signed a Quit Claim Deed, conveying property located at 5509 Fisk Avenue, Oshkosh, Wisconsin to Terry and Jill Culver.
8. APS began its investigation into Victim A's finances after a bank employee at US Bank raised concerns. Witness 1 requested receipts from Terry Culver to justify expenses which he claimed he made for the benefit of Victim A, as state statutes require the maintenance of these items, as does the POA agreement that he executed. Terry Culver has failed to provide the requested documentation.
9. Terry Culver admitted to APS that he owed money to Victim A, though did not give an amount due to her. Terry Culver told APS he would sign a promissory note and would pay Victim A what he had borrowed from her.
10. Terry Culver's position as Victim A's POA was terminated through a court proceeding, and on August 13, 2018, Oshkosh Family Inc., a non-profit corporate guardian, was appointed guardian of the person and estate for Victim A.
11. APS provided me with the records described above, as well as other records related to Victim A, including some limited bank records. I reviewed those materials and obtained complete bank records (dated March 16, 2013, to August 15, 2018) for Victim A's accounts:
 - a. US Bank platinum checking account ending in 4866 (hereafter Checking 4866). Account holder 'Victim A', c/o Terry Culver, Address: 2110 Elo Road, Picket, Wisconsin 54964. Address changed as of statement dated October 17, 2013, to 5509 Fisk Avenue, Oshkosh, Wisconsin 54904.
 - b. US Bank money market savings account ending in 8715 (hereafter "Savings 8715"). Account holder 'Victim A', c/o Terry Culver, Address: 2110 Elo Road, Picket, Wisconsin 54964. Address changed as of statement dated October 17, 2013, to 5509 Fisk Avenue, Oshkosh, Wisconsin 54904

12. I have also reviewed bank records for US Bank account *4900 in the name of Terry and Jill Culver, two West Pointe Bank accounts in the name of Terry and Jill Culver (*7322 and *7856), a bank account for ANK Farms US Bank *1377 owned by Terry and Jill Culver, and an account for ANK Farms at Winnebago Community Credit Union owned by Terry and Jill Culver. I received these records by subpoena.
13. Based on my review of all these records, I identified five categories of suspicious transactions dated March 16, 2013, to August 15, 2018:
 - a. Terry Culver wrote \$145,700 worth of Victim A's checks that included a memo line stating, "Loan." He wrote the checks to either himself or ANK Farms, which was the business he owned with Jill Culver. The checks were debited against Victim A's Checking 4866 and deposited into Terry Culver's personal accounts or the ANK Farms accounts, or otherwise endorsed by Terry Culver and cashed. Except for the alleged "repayment" described in more detail below, there is no record that any of this money was repaid, taken with the consent of Victim A, or otherwise used for the benefit of Victim A.
 - b. Terry Culver wrote an additional \$131,278.08 in checks for items for himself or his wife Jill Culver, and not for the benefit of or in the best interest of Victim A. These checks were drawn on Checking 4866. For example, on September 13, 2016, Terry Culver wrote a check to Menards in the amount of \$1,107.16. At this time, Victim A was living in a medical facility and owned no property. There is no record of repayment for any of these expenses.
 - c. Terry Culver wrote checks totaling \$113,600 to "cash" from Checking 4866. Terry Culver cashed these checks by endorsing the back. There is no record of repayment for any of these checks.
 - d. Records also show \$20,075 in cash withdrawals from Checking 4866 during the time which Victim A was confined in a health care facility and unable to make withdrawals. Terry Culver was the only other person authorized to make withdrawals during this time from this account. There is no record of repayment for any of these withdrawals.
 - e. Records also show \$17,074.67 of withdrawals from Savings 8715 during the time which Victim A was confined in a health care facility and unable to make withdrawals. Terry Culver was the only other person authorized to make withdrawals during this time from this account. There is no record of repayment for any of these withdrawals.
14. Based on my review of these records, Terry Culver used Victim A's money for the benefit of himself and without the permission of Victim A.
15. Terry Culver spent Victim A's money on personal travel and gaming expenses at casinos. For example, on Feb. 2, 2017, Terry Culver transferred \$2,000 from Victim A's account to a business account controlled by himself (ANK Farms). The next day, Feb. 3, 2017, Terry Culver withdrew cash from the ANK Farms' account in two separate transactions at an ATM at Oneida Casino, 2020 Airport Drive, Green Bay, Wisconsin 54313. Three days later, on Feb. 6, 2017, Terry Culver wrote a \$1,000 check from Victim A's account made out to "Cash," which he endorsed and cashed the same day. Two days later, on Feb. 8, 2017, Terry Culver visited Harrah's Casino, in Laughlin, Nevada.
16. In comparing Victim A's accounts to Terry Culver's bank accounts, there are many instances in which Terry Culver withdrew money from Victim A's accounts through either cashing a check or transferring the money to another account controlled by Terry Culver, and then Terry Culver withdrew money within days at casinos in Nekoosa, Wisconsin, Green Bay, Wisconsin, Baraboo,

Wisconsin, Council Bluffs, Iowa, Dubuque, Iowa, Deadwood, South Dakota, Laughlin, Nevada, and Las Vegas, Nevada. I discovered relevant casino expenditures between September 9, 2015, and August 17, 2019. I have contacted several of these casinos and confirmed that Terry Culver had spent money in gaming expenses at these casinos.

17. In total, based on my review of the bank records, just for the limited time period January 1, 2015, and August 15, 2018, Terry Culver spent \$74,335.58 for gaming-related expenses at the same time he withdrew over \$200,000 from Victim A's accounts. Victim A did not consent to any personal use of these funds by Terry Culver.
18. Bank records also reveal that Terry Culver spent or withdrew money at taverns and restaurants at the same time he was transferring money from Victim A's accounts into his own personal or business accounts or withdrawing cash from Victim A's accounts. For example, on July 18, 2017, Terry Culver transferred \$1,000 from Victim A's account to his business account. On that same day, Terry Culver withdrew \$202.95 from his business account at Ron's Trail Inn, a tavern located at 2664 Highway 116, Waukau, Wisconsin 54980. In all, I discovered 168 separate transactions totaling \$23,454.35 at taverns or restaurants between January 1, 2015, and August 15, 2018. During this same period, Terry Culver withdrew over \$200,000 from Victim A's accounts.
19. In summary, for the period March 16, 2013, to August 15, 2018, Terry Culver removed \$427,727.75 from Victim A's bank accounts and used the money for his own benefit and without the consent of Victim A.
20. On March 20, 2019, Terry Culver recorded a certified survey map that split the house and acreage located at 5509 Fisk Avenue, Oshkosh, Wisconsin, which they received by way of the Quit Claim Deed on January 19, 2016, into three parcels.
21. On April 1, 2019, Terry Culver sold two of the three parcels for \$248,700. Terry Culver retained the parcel containing the house formerly owned and occupied by Victim A.
22. On April 2, 2019, Victim A's appointed guardian took receipt of a check from Terry and Jill Culver in the amount of \$125,000. The Culvers made the payment to satisfy a promissory note they signed in Winnebago County, Wisconsin, and dated February 26, 2019. Under that note, the Culvers promised to pay Victim A \$120,000 plus \$5,000 in interest. The note "shall be due and payable: (1) upon the successful Closing of 5509 Fisk Avenue, Town of Utica, Winnebago County, Wisconsin (Tax Parcel#: 024-0274 & 024-0284) (the "Property"); or (2) no later than September 30, 2019."
23. Terry Culver made other payments to Victim A, two of which were labeled as "loan" and/or "rent" in the memo line of the checks. These payments, made January 14, 2013, February 10, 2014, May 12, 2014, December 28, 2014, and January 11, 2018, totaled \$23,800.10.
24. In contrast to the \$427,727.75 removed from Victim A's bank accounts, Terry Culver repaid Victim A \$148,800.10.
25. I, along with S/A Kyra Schallhorn, interviewed Victim A at Victim A's residence, a nursing home in Oshkosh, Wisconsin, on January 24, 2019. Victim A recounted the following:
26. Victim A has known Terry Culver since he was nine years old. Victim A knew that Terry Culver had gone through bankruptcy and lost his house. Victim A believed Terry Culver was now living in Victim A's house but didn't know for sure.

27. Victim A had 42 acres and a house. Terry Culver was running the farm. Victim A believed that Terry Culver took all of Victim A's money and went to Las Vegas to gamble. Victim A did not know how much money she had or how much money Terry Culver took.
28. Victim A asked if she had enough money to stay "here," meaning the facility in which she was residing. Victim A said she did not loan money to anyone. She said she did not know how much money she had when she moved into the facility. She said she received social security, and her investments included her home/farm and the cottage/lake property.
29. Victim A was concerned about Terry Culver taking her money and stated she wanted to pay her way at the facility. She said that he should not have taken any of it and again expressed concern about Terry Culver's gambling.
30. Victim A was shown a copy of her will which she signed in June 2013. Terry and Jill Culver had been listed as beneficiaries of real property, including her house. She said she didn't want to sell her house right away, and that she wanted to keep it for a while. She said she did sign the will, and that she recognized her signature. Victim A read portions of it and saw that the house was willed to Terry Culver and said that she didn't want that. She stated her house should not be given to Terry Culver, but rather it should be sold and the money should go to the three organizations she had listed in the will: the Humane Society, the Boys and Girls Club, and the UW Oshkosh Foundation. Victim A said that she used to think Terry Culver was her friend and that was why she had willed her house to him, but she had concluded that Terry Culver was only "Terry's friend."
31. Victim A said she knew what a deed was and had one for her house. She said she knew what a Quit Claim Deed was and said she did not sign one or give her house to anyone "unless I'm stupid." She said again that the property should be sold, and the money should go to those organizations listed in her will.
32. On May 6, 2019, DCI, assisted by the Winnebago County Sheriff's Department, the Winnebago County District Attorney's Office, and the Department of Revenue (DOR), executed a search warrant at the residence of Terry and Jill Culver, 5509 Fisk Avenue, Oshkosh, Wisconsin. During the execution of the search warrant, I interviewed Terry and Jill Culver with DCI S/A Bradley Kust. Terry Culver stated that he knew Victim A since 1967 and that he was taking care of her grass. He also said that he was her POA. Terry Culver recounted that after Victim A left her house, he emptied her house and removed eight 20-yard dumpsters of things. Terry Culver recounted the very poor condition of the house and said he had to take the house "down to the studs." The house, approximately 1,300 feet, needed to be fixed up and made ready for Victim A to return home, according to Terry Culver. He also said that in December 2013 or January 2014, Victim A's house was complete. Terry Culver then called his attorney and ended the interview.
33. S/A Kust and Winnebago County Sheriff's Office Detective Kyle Shroeder interviewed Jill Culver at the time of the search warrant. Jill Culver recounted how Victim A had no relatives and was incompetent to take care of herself, and that she wanted the Culvers to take care of her house and live there. Jill Culver recounted how Victim A's home was "trashed" when she left and had no working appliances and toilets. According to Jill Culver, the Culvers bought appliances for the home and ordered dumpsters that they tossed all the "junk" into from Victim A's home. The "salvaged goods" were placed into a storage facility. The Culvers then contracted some of the work on Victim A's home to get things up to code, but they cleaned the house themselves. Jill Culver said it took "months and months and months" to clean and repair Victim A's home, taking from June 2013 to December 2013. Jill said that the Culvers used Victim A's money for all new appliances but used their own money for furniture. Jill said that Victim A wanted the Culvers to live in the house, take care of it, and eventually everything was supposed to go to the Culvers except for some donations. Jill then admitted that Terry Culver "borrows" money from Victim A to

pay for farming equipment that he stored in a nearby shed. Jill said that Terry used Victim A's money to pay for "upkeep." Jill Culver then talked to her attorney and terminated the interview.

34. All events relevant to the allegations in Count 1 of this Complaint took place in Winnebago County, Wisconsin. Furthermore, during all dates relevant to this Complaint, Terry Culver resided in Winnebago County, Wisconsin.

Counts 2-6

35. In addition to all of the factual bases recounted above, Counts 2-6 are further supported by the investigation of DOR S/A Lisa Kennedy between 2013 and 2018. I reviewed a report written by S/A Kennedy and related records and found them to be reliable.
36. According to DOR's investigation, while Terry Culver was POA for Victim A, he failed to report more than \$425,000 in income he received from Victim A in the form of "loans," checks labeled "cash," and checks for home improvement items, vehicle expenses, appliances, furniture, and other items. These amounts constitute income that must be reported on income tax returns, but Terry Culver made no such reports and instead filed false and fraudulent returns, contrary to Wis. Stat. § 71.83(2)(b)l.
37. As further explained below, Terry Culver failed to report approximately \$290,000 of income for the 2013 through 2018 years. For these years, DOR calculated that Terry Culver evaded \$20,896 in Wisconsin income tax. A comparison of the bank records to the income tax returns filed indicate that Terry Culver spent more money each year than he earned in wages, farm income, unemployment income, retirement income, and gambling winnings. Most of this money was spent on expenses like gambling and bars.
38. As to Count 2, Terry Culver electronically filed a married filing joint income tax return on Wisconsin Form 1 for 2014. DOR received this return on September 1, 2015. In that tax year, Terry Culver had approximately \$60,000 of unreported taxable income.
39. As to Count 3, Terry Culver electronically filed a married filing joint income tax return on Wisconsin Form 1 for 2015. The return was received by DOR on April 16, 2016. In that tax year, Terry Culver had approximately \$11,374.54 of unreported taxable income.
40. As to Count 4, Terry Culver electronically filed a married filing joint income tax return on Wisconsin Form 1 for 2016. The return was received by DOR on March 13, 2017. In that tax year, Terry Culver had approximately \$57,631.77 of unreported taxable income.
41. As to Count 5, Terry Culver electronically filed a married filing joint income tax return on Wisconsin Form 1 for 2017. The return was received by DOR on March 16, 2018. In that tax year, Terry Culver had approximately \$95,600 of unreported taxable income.
42. As to Count 6, Terry Culver electronically filed a married filing joint income tax return on Wisconsin Form 1 for 2018. The return was received by DOR on April 9, 2019. In that tax year, Terry Culver had approximately \$29,175 of unreported taxable income.
43. Terry Culver filed each of these returns from Winnebago County, Wisconsin, and while he resided in that county.

As to all counts:

44. I, the Complainant, believe that the information contained above is truthful and accurate. The facts in this Complaint are a summary to support probable cause. This Complaint does not contain all

the facts known to me relating to this investigation. I believe that there is probable cause to believe that the Defendant, Terry Lynn Culver, committed the criminal offenses identified in this Complaint.

Dated this 11th day of September, 2020.

Complainant:

Electronically signed by:

s/ Loreen Glaman

Special Agent Loreen Glaman
Division of Criminal Investigation
Wisconsin Department of Justice

Subscribed and sworn to before me and approved
for filing this 11th day of September, 2020.

Electronically signed by:

s/ Daniel P. Lennington

DANIEL P. LENNINGTON
Assistant Attorney General
State Bar #1088694

Attorney for the State of Wisconsin

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