

STATE OF WISCONSIN CIRCUIT COURT FOND DU LAC COUNTY

STATE OF WISCONSIN
Plaintiff,

vs.

MARKEIS D. CARTER
114-312 S Main St
Fond Du Lac, WI
DOB: 05/10/1980
Sex/Race: M/B
Alias:

Defendant.

DA Case No.: 2022FL000292
Assigned DA/ADA: Eric J. Toney
Agency Case No.: 21-8149
Court Case No.:
ATN:

CRIMINAL COMPLAINT

For Official Use

The undersigned law enforcement officer, of the Fond du Lac Police Department, being first duly sworn, states that:

Count 1: ELECTION FRAUD - FALSELY PROCURING VOTER REGISTRATION

The above-named defendant on or about Monday, November 29, 2021, in the City of Fond du Lac, Fond du Lac County, Wisconsin, did intentionally and falsely procure voter registration, contrary to sec. 12.13(1)(b), 939.50(3)(i) Wis. Stats., a Class I Felony, and upon conviction 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.

PROBABLE CAUSE:

Complainant is a Detective with the City of Fond du Lac Police Department and basis this complaint upon the report and investigation of Detective Vance Henning of the same agency with whom your complainant has worked with and knows to be competent and reliable.

On November 22, 2021 Detective Vance Henning began investigating allegations of voter fraud from the November 2020 election that was submitted to the City of Fond du Lac Police Department via email. The complaint alleged five individuals illegally registered to vote in violation of Wis. Stat. 12.13(1)(a) by using PO Boxes with address of 114 S. Main St., Fond du Lac, WI, which is the address for the UPS store in Fond du Lac. The 5 names included in the complaint are: Deonta Carter, Sam Wells, Jamie Marie Wells, Jeffrey Testroete, and Lawrence Klug.

Detective Henning spoke with a UPS Store employee on November 29, 2021 and learned that there are no apartments attached to the UPS Store which share the same address of 114 S. Main St.

On December 17, 2021 Detective Henning spoke with City of Fond du Lac Clerk Maggie Hefter who provided Detective Henning the voter registration application for each of the five individuals. Detective Henning learned that Lawrence Klug completed a paper copy of the Wisconsin Registration Application and the other four individuals noted in the complaint completed online voter registration. City Clerk Hefter informed Detective Henning that Jeffrey Testroete and Markeis Carter did not vote. Hefter also informed Detective Henning that Lawrence Klug, Sam Wells and Jamie Wells also voted in the November 2020 election using the addresses on their Wisconsin IDs as follows:

- Jamie Marie Wells: 114 S. Main St. #155, Fond du Lac, WI 54935
- Sam Wells: 114 S. Main St. #155, Fond du Lac, WI 54935
- Lawrence Klug: 114 S. Main St. #114, Fond du Lac, WI 54935

On January 11, 2022 Detective Henning spoke with Jamie Wells who confirmed her husband is Sam Wells. Jamie Stated she was in Louisiana with her husband and wouldn't be back in Wisconsin for a few months. Jamie stated they live in Wisconsin but wanted to get away from the cold weather and would be back in May. Jamie stated they

have a travel trailer and stay in Fond du Lac most of the time but don't have an actual home address. Jamie stated when in Fond du Lac County they usually park their travel trailer at KOA camp ground in Eden which is located outside the City of Fond du Lac but in Fond du Lac County. Jamie stated they haven't stayed at KOA in a couple years and for the past two years have been staying in New London, WI which is outside of Fond du Lac County.

Jamie Wells told Detective Henning that she listed her PO Box when registering to vote because it is her "home base." Jamie was informed that she cannot register to vote with a PO Box and she indicated that would be changed. Jamie also stated that the candidate she voted for didn't win so it didn't matter anyways. Detective Henning explained that he was following on allegations of people illegal registering to vote with PO Boxes. Jamie told Detective Henning that he should be looking at the election in Wisconsin because she was cheated for Trump and they took it away from Trump.

On January 12, 2022 Detective Henning spoke with Markeis Carter at an apartment on Hawthorne Drive in the City and County of Fond du Lac, WI which belonged to Carter's girlfriend. Carter confirmed his PO Box #312 and Carter stated that he believed he provided his PO Box address in registering to vote. Carter appeared very apologetic upon learning that he could not register to vote with a PO Box.

On January 14, 2022 Detective Henning spoke with Jeffrey Testroete at his residence located at 290 Doty St. #3 located in the City and County of Fond du Lac, WI. Testroete confirmed his PO Box #254 with Detective Henning and stated that he has been living on Doty Street for about 2 months. Testroete denied registering to vote in the November 2020 election and Detective Henning showed him a copy of Testroete's online registering listing the PO Box. Testroete stated he was living out of his truck at the time and DMV wouldn't take a PO Box as an address so Testroete got the UPS Store PO Box because he could list that as an address on his license.

Detective Henning made numerous attempts to locate Lawrence Klug but was unable to locate him. It included communicating with his family, using prior in house records and reaching out to other law enforcement agencies.

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

Subscribed and sworn to before me on 02/10/22

Electronically Signed By:

Kristian K. Lindo

Assistant District Attorney

State Bar #: 1089021

Electronically Signed By:

Detective Vance Henning

Complainant