

FILED
02-10-2022
Clerk of Courts
Fond du Lac County WI
2022CF000104

STATE OF WISCONSIN CIRCUIT COURT FOND DU LAC COUNTY

STATE OF WISCONSIN

Plaintiff,

vs.

LAWRENCE K KLUG

114-114 S Main St

Fond Du Lac, WI

DOB: 11/19/1945

Sex/Race: M/W

Alias:

Defendant.

DA Case No.: 2022FL000293

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 - PROVIDING FALSE INFORMATION TO ELECTION OFFICIAL

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 make a false statement to an election official, 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 an 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.

1. 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)(b) by using PO Boxes with an address of 114 S. Main St., Fond du Lac, WI, which is the address for the UPS store in Fond du Lac and not a residential address for any of the fives names: Markeis Carter, Sam Wells, Jamie Marie Wells, Jeffrey Testroete, and Lawrence Klug.
2. 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 Street and that this address would therefore not be the residence of any of the five individuals in paragraph 1.
3. 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 in the November 3, 2020 election but that Lawrence Klug, Jamie Wells, and Sam Wells voted in the November 3, 2020 election.
4. Voter registration records reflect that:
 - Carter registered to vote on July 19, 2018,
 - Testroete registered to vote on September 25, 2020,
 - Sam Wells registered to vote on September 20, 2020,
 - Jamie Wells registered to vote on May 1, 2020, and

Lawrence Klug registered to vote on October 25, 2012.

- 5. Hefter also informed Detective Henning that Lawrence Klug, Sam Wells and Jamie Wells also voted in the November 3, 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

- 6. 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.
- 7. 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 allegations of people illegally registering to vote with PO Boxes. Jamie told Detective Henning that he should be looking at the election in Wisconsin because the election was cheated and "they took it away from Trump."
- 8. 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.
- 9. 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.
- 10. 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 02/09/22
 Electronically Signed By:
 Eric J. Toney
 District Attorney
 State Bar #: 1079214

Electronically Signed By:
 Detective Vance Henning
 Complainant