DODGE COUNTY, WISCONSIN

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Daniel L Siegmann,

 Plaintiff,

 v.

David Frohling and Danielle Van Egtern

 Defendants.

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**CRIMINAL COMPLAINT**

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 **I. NATURE OF ACTION**

 101. On August 16, 2022 David Frohling and Danielle Van Egtern took, carried away, and retained in their possession Daniel L. Siegmann’s movable property, without consent and against his expressed will. They took unauthorized control over it, permanently depriving Daniel L. Siegmann and his intended recipients of this property.

 102. The stolen property has a cumulative value of approximately $250.00.

 **II. JURISDICTION AND VENUE**

201. The Office of District Attorney of Dodge County, Wisconsin is the proper venue for this action because the Defendants’ violations occurred and the Plaintiff’s claim arose within the geographical boundaries of Dodge County, WI.

 **Ⅲ. PARTIES**

 A. Plaintiff

 301. Daniel L. Siegmann is an adult resident of Dodge County in Wisconsin, the Dodge County Supervisor of District 10 of Dodge County, WI.

 B. Defendants

 302. David Frohling is an adult resident of Dodge County in Wisconsin, the Dodge County Supervisor of District 23 of Dodge County, WI, and the Chairman of the Dodge County Board of Supervisors.

 303. Defendant Van Egtern is a Clerk employed in the Dodge County, WI County Clerk Office.

**Ⅳ. ALLEGATIONS OF FACT AS TO ALL CAUSES OF ACTION**

401. Plaintiff Siegmann found that he would not be able to attend the Board of Supervisors meeting of August 16, 2022 which began at 6:00pm.

 402. Plaintiff Siegmann had intended to distribute some of his written communication and speech by personal letter to his fellow supervisors prior to the meeting.

 403. This personal communication and speech by personal letter was contained in manila envelopes, one for each supervisor.

 404. Plaintiff Siegmann decided to get his written communication and speech to his fellow supervisors by having a 3rd party, Ajay Schnitzler, pick them up and deliver them.

 405. At or about 5:40pm Schnitzler arrived at the meeting and began to deliver the Plaintiff’s letters to the Supervisors, either handing it directly to them or placing it upon their personal desk in the meeting room (see video on flashdrive and Exhibit A– timeline of video)

 406. Defendants Frohling and Van Egtern began to walk along the Supervisor’s desks to take the Plaintiff’s personal letter of communication and speech and the manila envelopes which contained them into their personal possession.

 407. Defendants Frohling and Van Egtern demanded some supervisors to put the Plaintiff’s material back in the envelopes and hand it over to them.

 408. The Defendants took the Plaintiff’s property to their desk at the front of the room.

 409. Schnitzler gave the Plaintiff a call from his cell phone to inform the Plaintiff that the Defendants were taking his property which had been distributed to the Supervisors.

 410. Schnitzler asked if the Plaintiff wanted to speak with Defendant Frohling and he answered in the affirmative.

 411. Plaintiff Siegmann told Defendant Frohling that the envelopes and their content were the Plaintiff’s property containing his speech and that Defendant Frohling could not take them. He had been warned. (Affidavit, Exhibit B)

 412. Defendants Frohling and Van Egtern kept the Plaintiff’s property in their possession, refusing to allow the other supervisors to possess it, even though the Supervisors had a superior right of possession.

 **Ⅴ. VIOLATIONS OF LAW**

501. Defendants Frohling and Van Egtern committed a criminal act of theft per WI. STATS. §943.20(1)(a) by exerting unauthorized control over the Plaintiff’s movable property prior to the regular Board of Supervisors meeting held on August 16, 2022. They took, carried away, and retained in their possession his property of approximately 30 manila envelopes along with their contents. The Defendants committed this act without the Plaintiff’s consent and against his expressed will with intent to permanently deprive the Plaintiff and his intended recipients of the possession of this property.

 502. Defendants Frohling and Van Egtern may have convinced themselves that they had legal interest in the Plaintiff’s movable property but this is still considered an act of theft per WI. STATS. §943.20(1)(c).

Signature \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Daniel L. Siegmann Date

State of

County of

Subscribed and sworn to (or affirmed) before me on this \_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_, 2022 by Daniel L. Siegmann, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

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Notary Public (Seal)