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STATE OF WISCONSIN

Plaintiff,

-vs-

DA Case No.: 2009EC000934  
Assigned DA/ADA: Lorelee Clark  
Agency Case No.: 091520SO  
Court Case No.:  
ATN:**KIPLEY S. SCHULTZ**

8721 9 Mile Creek Road

Fall Creek, WI 54742

DOB: 08/03/1949

Sex/Race: M/W

Eye Color: Blue

Hair Color: Gray

Height: 5 ft 10 in

Weight: 220 lbs

DL State/Number: WI S432-5174-9283-02

Alias: Also Known As Kiplely Scott Schultz

Defendant.

**Criminal Complaint**

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Ed Asselin, Court Officer, being first duly sworn, states that:**Count 1: POSSESSION OF CHILD PORNOGRAPHY**

The above-named defendant on or about Monday, March 9, 2009 in the Village of Fall Creek, Eau Claire County, Wisconsin, having attained the age of 18, did knowingly possess a motion picture or video of a child engaging in sexually explicit conduct, and knew or reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a **Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.**

And furthermore, pursuant to Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years. The Court may impose a sentence less than three years or place the person on probation upon a finding on the record that the Court finds the lesser sentence is in the best interests of the community and the public will not be harmed.

And furthermore, pursuant to Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

**Count 2: POSSESSION OF CHILD PORNOGRAPHY**

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**conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.**

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on probation upon a finding on the record that the Court finds the lesser sentence is in the best interests of the community and the public will not be harmed.

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**Count 13: POSSESSION OF CHILD PORNOGRAPHY**

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**PROBABLE CAUSE:**

The complainant is in possession of police reports by Fellow Officer Spallees, which form the basis for this complaint.

On March 9, 2009 Division of Criminal Investigation Special Agent Spallees and other officers executed a search warrant at the defendant's home, 8721 9 Mile Road in Fall Creek, Wisconsin. The defendant was home. Officers found many images of child pornography in the defendant's computers, including twenty six videos of children engaged in sexually explicit conduct.

The defendant admitted that he sought adult and child pornography through the internet. He said he had been doing it for three years. He said no one else in the household knew he was doing this. When asked what search terms he used, he said he used "pre-teen", "12yo" meaning 12 year old, and "15yo, meaning 15 year old. He claimed to have a sexual addiction. He said he preferred 15 to 16 year old females. He estimated he had around 500 images of child pornography.

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

Subscribed and sworn to before me,  
and approved for filing on:

This \_\_\_\_\_ day of \_\_\_\_\_,

\_\_\_\_\_  
Complainant

\_\_\_\_\_  
Assistant District Attorney