FILED
12-28-2022
Clerk of Circuit Court
Monroe County, WI
2022CF000710

STATE OF WISCONSIN CIRCUIT COURT MONROE COUNTY

STATE OF WISCONSIN
Plaintiff,

vs.

KEITH S. BURCH

Sex/Race: M/W
Eye Color: Blue
Hair Color: Brown
Height: 5 ft 9 in
Weight: 230 lbs
Alias: Also Known As Keith Scott Burch
Defendant.

DA Case No.: 2022MO001907
Assigned DA/ADA: Charles D. Betthauser
Agency Case No.: 21-1653
Court Case No.: 2022CF000
ATN:
DNA taken:

CRIMINAL COMPLAINT

For Official Use

The undersigned of the Monroe County Sheriff's Department or a designee thereof, being first duly sworn, states that:

Count 1: FRAUD/RENDERING INCOME TAX RETURN OR OBTAIN REFUND WITH FRAUDULENT INTENT

The above-named defendant on or about Monday, September 4, 2017, Monroe County, Wisconsin, did render a false or fraudulent income tax return with intent to defeat or evade any assessment required by this chapter, or to obtain a refund or credit with fraudulent intent, contrary to sec. 71.83(2)(b)1 Wis. Stats., 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 2: FRAUD/RENDERING INCOME TAX RETURN OR OBTAIN REFUND WITH FRAUDULENT INTENT

The above-named defendant on or about Monday, February 5, 2018, Monroe County, Wisconsin, did render a false or fraudulent income tax return with intent to defeat or evade any assessment required by this chapter, or to obtain a refund or credit with fraudulent intent, contrary to sec. 71.83(2)(b)1 Wis. Stats., 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 OR OBTAIN REFUND WITH FRAUDULENT INTENT

The above-named defendant on or about Sunday, February 10, 2019, Monroe County, Wisconsin, did render a false or fraudulent income tax return with intent to defeat or evade any assessment required by this chapter, or to obtain a refund or credit with fraudulent intent, contrary to sec. 71.83(2)(b)1 Wis. Stats., 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.

PROBABLE CAUSE:

Complainant relates that he has reviewed incident reports prepared by Agents Mary Van Schoyck, Amy Templin, and Steven Kosmosky of the Wisconsin Department of Revenue Office of Criminal Investigation, a law enforcement officer believed to be truthful and reliable, whose report is modified in part and quoted herein, and which indicates as follows:

INTRODUCTION

The following summarizes my investigation of Keith Scott Burch (DOB 11/10/1967). The investigation showed he committed the following offenses:

- Filing a false income tax return in order to evade income tax contrary to sec. 71.83(2)(b)(1), Wis. Stats. (tax years 2016, 2017, & 2018, 3 counts), class H felony

- 2016 return was received September 6, 2017
- 2017 return was received February 5, 2018
- 2018 return was received February 10, 2019

Keith Burch owned and operated a private investigation business. Burch owned this business since at least 2013. The business was called Midwest Investigations in 2014 and prior. In 2015, Burch changed the name of the business to Coulee Investigations. Keith Burch filed a federal Schedule C for his private investigation business each year from at least 2013 to 2019. Burch's federal Schedule C business reported losses ranging from $21,850 to $39,593 (gradually increasing each year between 2016 through 2019). The losses he reported included car and truck expenses ranging from approximately $35,000 to over $46,000, for each year.

Burch's filing status each year between 2016 and 2019 was Married Filing Joint with his now ex-spouse, . Keith and divorced in 2021. As of the date of this report, Keith Burch has not filed a 2020 or 2021 Wisconsin income tax return. filed a Married Filing Separate return for the year 2020 and as a single filer for tax year 2021.

Keith Burch's 2016 Wisconsin return was adjusted by the DOR based on adjustments made by the Internal Revenue Service (IRS) to include unreported gambling income. The information was provided to DOR as authorized by federal law under Section 6103(d), IRC. This adjustment did not constitute a complete audit of the return and as such left the period open for DOR to take further action.

I searched available DOR records regarding Burch's employment. The most current employment record I found was with the City of Madison that showed a hire date of April 4, 2021. During the July 28, 2021 interview SA Van Schoyck and SA Templin conducted with Burch, he told them he was unemployed and that his last employer was the City of Madison where he worked as a "park ranger" ***(exhibit #1).***

Burch registered a business with the Wisconsin Department of Financial Institutions on March 25, 2012. Burch listed his business names as Midwest Investigations and Wisconsin State Process LLC and listed himself as the registered agent with a principal office located at 506 Henry St, Westby, WI 54667. According to the records, this business was administratively dissolved on March 20, 2017.

THEORY OF CASE

Between January of 2016 and December of 2020, Keith Burch received money from by three different means; issued checks to Burch as the payee, she issued checks to herself as the payee which she then cashed and gave the money to Burch, additionally, she withdrew cash from her accounts and gave it directly to Burch. This investigation was focused on tax years 2016, 2017, and 2018. Although this activity started in 2015 and continued into 2019 and 2020, the tax impact for 2015 and 2019 was minimal. As of the date of this report, Burch has not filed a 2020 Wisconsin income tax return.

In the calendar year 2016, issued 34 checks to Keith Burch totaling $88,500. Most of those checks had the words "case" or "inv. case" written in the memo line. In the calendar year 2017, issued 7 checks to Burch or his business, Coulee Investigations, totaling $19,250. In the calendar year 2018, issued 4 checks to Keith Burch totaling $4,205

In the calendar year 2016, issued 27 checks to herself totaling $39,225. In the calendar year 2017, issued 38 checks to herself totaling $35,470. In the calendar year 2018, issued 7 checks to herself totaling $2,206. During this timeframe, had written out other checks to herself to transfer money between accounts. Transfers between her accounts were not included in these totals. The checks identified in this calculation typically had a blank memo line or included a variation of "growth distribution" and were cashed, not deposited into any of 's bank accounts

Between 2016 and 2020, withdrew a total of $37,372 cash by conducting 54 transactions. Cash was either directly withdrawn from one of 's accounts or received some cash back from a check deposited into her accounts. In the calendar year 2016, received $24,605 in cash from 35 transactions. In the calendar year 2017, received $12,268 in cash from 17 transactions. In the calendar year 2018, received $500 in cash from 1 transaction

	2016	***2017***	***2018***	***Total***
Checks from to Burch	$88,500	$19,250	$4,205	$111,955
Checks from to herself	$39,225	$35,470	$2,206	$76,901
Cash withdrawn from 's accounts	$24,605	$12,268	$500	$37,372
Total by year	$152,330	$66,988	$6,911	$226,228

For tax years 2016, 2017 and 2018 Keith and filed joint Wisconsin Form 1 income tax returns. All three returns were self-prepared and submitted via e-file. Burch used Intuit (Turbo Tax) software to complete the returns. Both spouses electronically signed the tax returns. Their 2018 Wisconsin income tax return was received by DOR on February10, 2019. Their 2017 Wisconsin income tax return was received by DOR on February 5, 2018. Their 2016 Wisconsin income tax return was received by DOR on September 6, 2017,

Burch filed a federal Schedule C with his 2016 federal income tax return for his business titled Midwest Investigations. He reported $22,100 of gross receipts. He reported $43,950 of business expenses (over $42K of which were car and truck expenses). He reported a net loss for his business of $21,850, which offset other taxable income and reduced his federal and Wisconsin income tax liability. Burch's federal Form 1040, line 21, reported $24,000 of gambling income. Line 21, "Other Income" did not include anything else. Proceeds from illegal activities and ill-gotten gains, such as theft, must be reported on line 21. It did not appear that Burch included the $152,330 he received from on the return

On November 20, 2018, Burch's 2016 Wisconsin income tax return was adjusted by the DOR to add previously unreported gambling proceeds. Burch under-reported their gambling proceeds by $20,030. The adjustment did not constitute a complete audit of the period and was based on a Federal Abstract Adjustment (adjustment of his federal income tax return, for the same issue, by the Internal Revenue Service),

Burch filed a federal Schedule C with his 2017 federal income tax return for his business titled Coulee Investigations. He reported $14,342 of gross receipts. He reported $42,508 of business expenses (over $35K of which were car and truck expenses). He reported a net loss for his business of $28,166, which offset other taxable income and reduced his federal and Wisconsin income tax liability. Burch's federal Form 1040, line 21, was blank. Proceeds from illegal activities and ill-gotten gains, such as theft, must be reported on line 21. It did not appear that Burch included the $66,988 he received from on the return,

Burch filed a federal Schedule C with his 2018 federal income tax return for his business titled Coulee Investigations. He reported $8,188 of gross receipts. He reported $43,651 of business expenses (over $35K of which were car and truck expenses). He reported a net loss for his business of $35,463, which offset other taxable income and reduced his federal and Wisconsin income tax liability. Burch's federal Form 1040, Schedule 1, line 21, reported $3,700 of gambling proceeds. Proceeds from illegal activities and ill-gotten gains, such as theft, must be reported on line 21. It did not appear that Burch included the $6,911 he received from on the return

During SA Van Schoyck and SA Templin's interview with Burch on July 28, 2021, he repeatedly stated that the money he received from was earned income in exchange for his investigative services. At the 36:11 mark of the interview, Burch stated he received $160,000 from in total, and said it ended up being approximately $40,000 per year (2015-2018). Burch told his interviewers that only a very small amount was given to him as a gift. He stated paid a month's rent for a cabin he stayed at in Hatfield, bought him a crossbow, a handgun, and gave him some money for medication. Burch was adamant that he "earned" the money he got from (see the next section of this report for additional information regarding the interview).

Since Burch insisted that the income was earned income from his investigative business, instead of treating the money he received from as "Other Income" (federal Form 1040, line 21), we have calculated the Wisconsin tax consequences of his actions by treating the money he received as gross receipts from his business that should have been reported on his federal Schedule C. This treatment is advantageous for Burch as it allows for an annual deduction of one-half of the self-employment tax (so long as the business showed a net profit).

The amounts in this report and supporting documents were taken from a thorough review of all the known bank accounts Keith and had access to during 2016, 2017, and 2018 (personal and business). The direct, specific item(s), method of proving income was appropriate in this case of understated income. The aggregate specific item(s) method is used when it is not possible to specifically identify the items of income which were not reported on a subject's tax return, due to a lack of accurate books and records. During the July 28, 2021 interview, Burch repeatedly told the investigators that he did not have any business records. In this case, it was unknown if any of the gross receipts Burch reported on his 2016-2018 federal Schedule C included any of the money he received from . As such, the aggregate approach to the specific item method of proof was used to calculate Burch's correct taxable income.

This approach required specific identification of all of Burch's items of income and then comparison of that amount to his total reported taxable income.

Wisconsin Individual Income Tax:

The effect of the unreported income on Burch's Wisconsin income taxes is summarized below, also see ***(exhibit #3)***:

	2016	2017	2018
Wisconsin income as reported:	$91,458	$45,259	$44,631
Add unreported self-employment income:	$131,930	$57,944	$10,042
Less self-employed tax deduction:	$(7,777)	$(2,104)	$(0)
Wisconsin income (as adjusted):	$215,611	$101,099	$54,673
Less exemptions:	$(2,800)	$(1,400)	$(1,400)
Less standard deduction	$(0)	$(3,455)	$(13,105)
Taxable income:	$212,811	$96,244	$40,168
Wisconsin income tax:	$12,943	$5,630	$2,105
Less school property tax credit as reported:	$(300)	$(300)	$(73)
Wisconsin withholding as reported:	$(4,024)	$(4,284)	$(4,424)
Wisconsin income tax due (as adjusted):	**$8,619**	**$1,046**	**$0**
Wisconsin income tax refund (as adjusted):	**$0**	**$0**	**$2,392**
Income tax previously refunded:	**$0**	**$3,146**	**$3,134**
Income tax previously paid:	**$508**	**$0**	**$0**
Amount due the State of Wisconsin:	**$8,111**	**$4,192**	**$742**

The total tax loss to the state of Wisconsin for these three years was **$13,045**, which does not include underpayment interest or regular 12% interest, as charged in accordance with Wisconsin law. It also does not include applicable fraud penalties. We have included the applicable deductions for one-half of the self-employment tax deduction due to the adjustments made to his self-employment income (the money he received from), for 2016 and 2017. Since the business still showed a net loss after adjustment for tax year 2018, Burch did not qualify for the self-employment tax deduction. Additionally, we subtracted the amounts Burch reported as gross receipts for his investigation business for 2016, 2017, and 2018 because we were unable to determine if all or any of those amounts he reported was money he received from . As such, the adjustments to Wisconsin income, for each year, include the money he received from , plus income he received from other business clients (as verified by 1st Community Credit Union account records), less the amount he reported on his federal Schedule C for gross receipts. This insures items of income were not counted twice.

In addition to the preferential tax treatment described above, the tax calculations do not include amounts charged to various credit cards had. told investigators that she had several cards that were maxed out due to purchasing gift cards given to Burch, cash advances taken for Burch, and other purchases made for Burch. The tax calculations also exclude payments made to Burch's cell phone account as well as payments she made for a storage locker rented by Burch.

Burch resides at Wisconsin. is located in Monroe County Wisconsin, as such, venue lives in Monroe County.

EVIDENCE & RESULTS OF INVESTIGATION

Bank/Credit Union Records & Subpoenas:

When I took over this case on February 15, 2022 for former SA Nick Weidman. I transferred the electronic case file from his secure drive to my own. Former SA Weidman told me he had received the files from SA Van Schoyck. The case file included bank records from the following financial institutions:

- 1st Community Credit Union
- Altra Federal Credit Union
- Bank of Galesville (now Bluff View Bank)
- Citizens First Bank
- CO-OP Credit Union
- Edward Jones

I reviewed 's bank/credit union records and created an Excel workbook that summarized the transactions where wrote checks to Burch, wrote checks to herself and turned the cash over to Burch, and took cash out directly for Burch. The amounts of the cash withdrawals and the amounts of the checks wrote to herself, turning the cash over to Burch, were verified by her bank/credit union records as well as by during an in-home interview conducted by SA Templin and Van Schoyck on July 13, 2021. The records showed Burch received the following amounts from :

TAXABLE PERIOD	REFERENCE	01/01/2016 12/31/2016	01/01/2017 12/31/2017	01/01/2018 12/31/2018	TOTALS
CHECKS FROM TO KEITH BURCH	SCH. 1.1	$88,500	$19,250	$4,205	$111,955
CHECKS FROM TO HERSELF FOR BURCH	SCH. 1.2	$39,225	$35,470	$2,206	$76,901
CASH WITHDRAWALS FROM ACCTS	SCH. 1.3	$24,605	$12,268	$500	$37,372
TOTAL		$152,330	$66,988	$6,911	$226,228

Returns Filed:

For tax years 2016, 2017, and 2018, Keith Burch filed Wisconsin income tax returns using the married filing joint status with his now ex-wife . Burch reported taxable income as follows:

	2016	2017	2018
Wages from	$69,278	$73,425	$75,669
Wages from	$ 0	$ 0	$725
Income from Keith's self-employment	$22,100	$14,342	$8,188
Gambling winnings – as reported	$24,000	$ 0	$3,700
Gambling winnings – DOR adjustment	$20,030	$ 0	$ 0
Reported Wisconsin Income	$91,458*	$45,259	$44,631

Burch did not report the money he received from as "Other Income" on his federal Form 1040, line 21. Since Burch did not have any business records, it was unknown how he determined the amounts he reported as gross receipts for his self-employment. The amounts he reported were dramatically lower than the amounts he received from , his federal and Wisconsin income tax returns are included.

Tax Implications:

The following tables summarize the tax implications of Burch's behavior, also see ***(exhibit #3)***:

2016 Wisconsin Income Tax Details:

Item	Amount (as reported)	Adjustments	Amount (as adjusted)
Wisconsin Income	$91,458	Adjustment for Keith's unreported self-employment income of $131,930, less $7,777 self-employment tax deduction	$215,611
Standard Deduction	$5,187	No longer qualifies for a Wisconsin standard deduction, income above threshold	$0
Exemptions	$2,800		$2,800
Tax	$4,832		$12,943
School Property Tax Credit	$300	No change	$300
Net Tax	$4,532		$12,643
Withholding	$4,024		$4,024
Refund	$0		$0
Tax Due	**$508**		**$8,619**
Difference in Tax	NA		$8,111
**2016 WI Income adjusted by DOR*		**2016 Loss to Wisconsin:**	**$8,111**

*** The Wisconsin income adjustment was calculated as follows: $152,330 (income from) + $1,700 (income from other business customers as shown in the 1st Community Credit Union records) - $22,100 (gross receipts previously reported by Burch on his federal Schedule C)*

2017 Wisconsin Income Tax Details:

Item	Amount (as reported)	Adjustments	Amount (as adjusted)
Wisconsin Income	$45,259	Adjustment for Keith's unreported self-employment income $57,944, less $2,104 self-employment tax deduction	$101,099
Standard Deduction	$14,531	The Wisconsin standard deduction was reduced due to increased income	$3,455
Exemptions	$1,400		$1,400
Tax	$1,438		$5,630
School Property Tax Credit	$300	No change	$300
Net Tax	$1,138		$5,330
Withholding	$4,284		$4,284
Refund	**$3,146**		NA
Tax Due	$0		**$1,046**
Difference in Tax	NA		$4,192
		2017 Loss to Wisconsin:	**$4,192**

**The Wisconsin income adjustment was calculated as follows: $66,988 (income from) + $5,298 (income from other business customers as shown in the 1st Community Credit Union records) - $14,342 (gross receipts previously reported by Burch on his federal Schedule C)*

2018 Wisconsin Income Tax Details:

Item	Amount (as reported)	Adjustments	Amount (as adjusted)
Wisconsin Income	$44,631	Adjustment for Keith's unreported self-employment income $10,042	$54,673
Standard Deduction	$15,082	The Wisconsin standard deduction was reduced due to increased income	$13,105
Exemptions	$1,400		$1,400
Tax	$1,363		$2,105
School Property Tax Credit	$73	No change	$73
Net Tax	$1,290		$2,032
Withholding	$4,424		$4,424
Refund	**$3,134**		**$2,392**
Tax Due	$0		$0
Difference in Tax	NA		$742
		2018 Loss to Wisconsin:	**$742**

****The Wisconsin income adjustment was calculated as follows: $6,911 (income from) + $11,319 (income from other business customers as shown in the 1st Community Credit Union records) - $8,188 (gross receipts previously reported by Burch on his federal Schedule C)***

The total loss to the people of the state of Wisconsin was $13,045 for tax years 2016, 2017, and 2018.

Keith Burch Interview:

Keith Burch agreed to an interview with SA Templin and SA Van Schoyck, at the Tomah Police Department, on July 28, 2021. During the interview Keith Burch provided information about his private investigator businesses, Midwest Investigations and Coulee Investigations. He also described his relationship with , the money he received from , and the services he claimed to provide her. During this interview, Burch revealed the following, see ***(exhibit #1):***

- Burch stated he was living at Wisconsin.

- Burch stated he was unemployed.

- Burch stated he owned and operated a private investigation business named Midwest Investigations and later changed the name of that business to Coulee Investigations.

- Burch stated he was contacted by in mid to late 2015. was going through a divorce and she wanted Burch to find out why her husband was divorcing her.

- Burch said was afraid her now ex-husband, or a friend of his, would hurt her. She asked Burch to keep an eye on her home and property.

- Burch said he and agreed to $65 per hour with a $1,500 down payment for his services.

- Burch did not know how many hours he spent working for . (12:10)

- When asked about his business records, Burch said tracked his hours.

Burch said he worked "at least 70 hours per week" from mid to late 2015 through the end of 2017. (12:12)

- Burch found out that 's now ex-husband had invented a shooting bench that he was trying to patent and market. He surmised the money for the invention was the reason for the divorce. Burch stated the day after their divorce was finalized 's husband filed for the patent(s).

- Burch said in November 2015 he received a diagnosis of having a fatal disease called Lewy body dementia. He claimed he was told he had 3 years to live.

- Burch stated in the summer 2016 fell in love with him. Burch rented a cabin in Hatfield, WI. would frequently visit him at the cabin for non-business purposes. Burch said she would grab his groin, told him she loved him, and at one point he found her naked in his bed. (22:30)

- When asked if he led her on, Burch said something to the effect, "Maybe. Not in my eyes, but maybe through hers." (29:16)

- Burch said he worked for from mid to late 2015 through the end of 2017. He said there were some "pauses" but she would always contact him to start up again. (30:20)

- Burch said paid her in checks and cash.

- When asked if he gave receipts, he said something to the effect of, "No, she kept track of the money."

- When asked if he kept any records as a part of his business, Burch replied, "I stopped doing business at the end of 2016, so I let it go. I stopped. I was so stressed out." He was unable to provide approximate dates of the operation of his investigation business. (31:49)

- When asked if he was billing for his services, Burch said no. He said it was more of a "side job."

- Burch said he was the only one that did any paperwork for his business. (34:00)

- Burch said paid him a total of $160,000. He was unable to explain how he knew the total. (35:54)

- Burch stated something to the effect of, "I don’t have any records anymore. I have zero." Referencing paperwork for his dealings with . (36:30)

- Burch said he received some gifts from including a crossbow for his birthday, a month's rent for his cabin, medication, and a handgun that he later sold.

- Burch admitted telling and others that he was dying. (44:48)

- Burch said wrote a check payable to him with a memo that indicated it was a donation to the Lewy Body Dementia Foundation. Burch explained he spent the money on personal expenses and denied it was supposed to be a donation. (49:30)

- Burch said he found out he did not have Lewy body in April 2020.

- When asked about the checks he received from that had "growth distribution" or a similar memo, Burch said the payments were for his investigation services and denied gave him the money to invest for her. (51:30)

- Burch said was "kooky" when she was off her meds. He was asked why he took her money if he knew she was "kooky". Burch replied something to the effect of, "I didn't take her money God damn it! I worked my ass off!" (1:00:18)

- Burch asked interviewers if it was illegal to receive a loan from someone. When asked if the money he received from was a loan, he said it was not. (01:17:50)

- Burch was asked if he reported the money he received from on his tax returns. Burch replied, "Yeah, I broke it down. Look at it differently than she did. She lumped it all together, it broke down differently." (1:18:37)

- Burch explained to his interviewers that they could not track the cash he received.

- When confronted with the accusation that he treated as a "cash cow", Burch responded, "I worked for that fucking money! I earned that God damn money! Quit trying to pin it on me, I earned my ass! I had to spend time with that miserable person. It was terrible!" (1:20:45)

- Burch explained, "I didn't take 's money. That money you're talking about is her money not me. She paid me my money and she helped me here and there get through some rough times. Food and prescriptions, that was it, nothing else."

- Burch further explained, "I did not spend her money, that much money. She gave me nicely. I wouldn't take advantage. I wouldn't. This is a civil matter." (1:23:03)

- Burch was asked what led to him doing 's tax returns and what his tax preparation expertise was. He replied, "There ain't none. Turbo Tax, just plug the numbers in." (1:31:59)

- Burch confirmed he felt strongly that was delusional and "whacky" when not on her medication.

- When asked if was on her medication every time she gave him large amounts of money, Burch replied something to the effect, "She didn't give me large amounts of money! She paid me for the money I worked for!" (1:37:20)

- Burch stated, "You should be looking harder for who took that money. I didn't take that money. I got paid for what I did." (1:38:51)

- Burch further explained, "I took what that lady paid me for." He then expressed his desire to pay back for the prescription medication she bought for him. (1:40:40)

- Burch stated he had write him receipts for the money he received from her. He again said he did not provide with any invoices or receipts.

- Burch said, "She didn't give me the God damn money! I earned the money!" (1:43:40)

- Burch was asked if the $40,000 he received from each year was reported on his tax returns. He replied, "Yeah, pull it out, it's on there." He was then asked what he could provide for records if he was audited by the IRS or Revenue. He replied something to the effect, "They would just have to believe me. I don't have any records. They are gone." (1:48:03)

Additional Supporting Information:

In March of 2020, Burch applied for an animal control officer position with the Coulee Region Humane Society. With his application, Burch submitted a resume indicating his private investigator business ended in September of 2015, see ***(exhibit #5, p.112)***. Since Burch claimed he was not in business for tax years 2016, 2017, or 2018, he should not have claimed the business expenses he did on his federal Schedule C, see ***(exhibit #3)***.

In 2016, 2017, and 2018, Burch had a business account at 1st Community Credit Union. He used the business account for his personal banking despite having joint personal checking and savings accounts (with) at Altra Federal Credit Union during the same time period. Burch had his Social Security disability payments deposited into his business account during 2016-2018. He also had his paychecks from the State of Wisconsin deposited into the business account. Burch used the business account to pay for a snowmobile in October 2016 in the amount of $6,000 and he deposited a $3,500 check received for the sale of a boat in August 2017. In all three years, 2016-2018, Burch intermingled his personal and business income and expenses by using his business account for personal purposes.

A text message conversation string between Keith and from July 21, 2019 detailed Keith's desire to avoid paying tax on some of the money he received from

. Burch clearly knew he should have paid tax on the money he received from
.

EXPLANATION AND DEFENSE

Keith Burch asserts he did not steal or swindle the money he received from . Burch insisted paid him the money for his investigative services, less a "very small" amount that he believed to be gifts (prescription medication, a crossbow, a handgun, and a month's cabin rent). During the July 28, 2021 interview with SA Templin and SA Van Schoyck, Burch told the investigators that he reported the money he received from on his income tax returns.

Burch also stated that he returned a check for $130,000 to , without cashing it. He stated the check was for a percentage of what expected to receive from her ex-husband for an invention he created, as part of their divorce settlement. Burch claimed he didn't know if ever received that money. Burch said the fact that he returned the check to showed that he was honest and not taking advantage of . He stated he gave it back because, "it was the right thing to do."

REBUTTAL TO EXPLANATION AND DEFENSE

Burch completed and efiled his own 2016, 2017, and 2018 Wisconsin income tax returns. Burch also told he could file her returns and did so. I reviewed Burch's income tax returns for 2016-2018. He did not report any of the income he received from as "Other Income" (line 21, federal Form 1040). He did report a small amount of gross receipts for his investigations business, each year, on his federal Schedule C. Since Burch didn't keep business records, we were unable to determine what he included in those numbers. Even if all the income Burch reported as gross receipts, he did not report that vast majority of the income he received from .

Regarding the $130,000 check Burch returned to without cashing; Burch sent a text message to his now ex-wife, that stated, “I’m trying to figure out a way not to get tax then we can use some of the cash". SA Weideman received an electronic copy of the message from SA Van Schoyck. Additionally, although Burch did return that check to , he received over $225,000 from her that he didn't return between 2016-2018.

On information and belief venue is appropriate in Monroe County, Wisconsin as it is Burch’s current county of residence.

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

Subscribed and sworn to before me on 12/28/22
Electronically Signed By:
Crystal N. Long
Assistant District Attorney
State Bar #: 1025524

Electronically Signed By:
Brandon Leis
Complainant