

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 08-CR-51 (CNC)

ALLAN K. KEHL,

Defendant.

INDICTMENT

The Grand Jury Charges:

CONSPIRACY

1. Beginning sometime around July 2001 and continuing through at least the end of 2006, in the Eastern District of Wisconsin, and elsewhere,

Allan K. Kehl

did knowingly conspire with persons known and unknown to corruptly accept money from other persons, intending to be improperly rewarded in connection with the performance of his duties as Kenosha County Executive and the business of Kenosha County, in violation of Title 18, United States Code, section 666.

Background Allegations

2. At all times relevant to this Indictment, Kehl served as Kenosha County Executive, an elected governmental position in Kenosha County, Wisconsin.

3. During a 12-month period, overlapping with December 2005 and the other time periods of this Indictment, Kenosha County received in excess of \$10,000 from federal government under a variety of grant programs.

4. At all times relevant to this Indictment, Kenosha County and its County Executive position were involved in businesses and transactions connected with a Kenosha-area businessman, Dennis Troha.

5. One such business endeavor and series of transactions involved an effort to bring Indian gaming to the Kenosha area.

6. The business and transactions described herein had a value in excess of \$5,000.

Improper Payments

7. During the time period of the Indictment, Allan Kehl obtained cash payments from Troha and his agent.

8. The cash payments were solicited in the context of Kehl's position as County Executive and were taken by Kehl under the guise of campaign contributions for Kehl and another person.

9. As one such payment, Kehl approached Troha about making a campaign contribution for the benefit of Kehl's campaign for reelection as County Executive. In response, Troha gave Kehl a gift of \$5,000 in cash.

10. As another payment, Kehl sought money from Troha purportedly for the benefit of another person, who in 2006 was running for elected office in Kenosha County. In response, Troha gave Kehl \$5,000 in cash. The money, however, was never reported by Kehl, or the person for whom Kehl sought the money, as a campaign contribution.

11. As another payment, Kehl approached Troha to sell tickets to campaign fund-raisers. In response, Troha gave cash to Kehl. The amounts were in excess of campaign finance limits and, further, the money was never reported by Kehl as campaign contributions.

12. In fact, Kehl received the money, at least in part, as a reward connected to his duties as County Executive and the business endeavors and transactions involving Troha described above.

13. The total amount of cash payments received by Kehl was between \$15,000 and \$20,000.

Campaign Account Filings

14. As a further part of the conspiracy, Kehl filed and caused others to file false campaign finance reports.

Acts in Furtherance

15. In December 2005, in the State and Eastern District of Wisconsin, and in furtherance of the conspiracy described above, Kehl obtained \$5,000 in cash from Troha.

16. On or about December 21, 2005, in the State and Eastern District of Wisconsin, and in furtherance of the conspiracy described above, Kehl deposited \$3,500 cash to his personal bank account.

17. On or about January 31, 2006, in the State and Eastern District of Wisconsin, and in furtherance of the conspiracy described above, Kehl caused his campaign to publicly file a false campaign finance report.

All in violation of Title 18, United States Code, section 371.

A TRUE BILL:

/s/ 07-01
FOREPERSON

Dated: 2/12/08

/s/ Michelle L. Jacobs
for STEVEN M. BISKUPIC
United States Attorney