

**STATE OF WISCONSIN      CIRCUIT COURT      FOND DU LAC COUNTY**

DA Case No.: 2020FL002683  
Court Case No.: 2022CF000712

STATE OF WISCONSIN  
Plaintiff,

vs.

**SECOND AMENDED  
INFORMATION**

CARLA M ENDEWARD  
DOB: 10/25/1967  
Defendant.

*For Official Use*

**Count 1: FIRST DEGREE RECKLESS HOMICIDE - PTAC, AS A PARTY TO A CRIME, REPEATER**

The above-named defendant on or around March 5, 2020, in the City of Ripon, Fond du Lac County, Wisconsin, as a party to a crime, did cause the death of VICTIM 1, by the delivery or manufacture of a Schedule I or II controlled substance,, in violation of sec. 961.41 Wis. Stats., which VICTIM 1 used, dying as a result of that use, contrary to sec. 940.02(2)(a), 939.50(3)(c), 939.05, 939.62(1)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

And further, invoking the provisions of sec. 939.62(1)(c) Wis. Stats., because the defendant is a repeater, having been convicted of a felony in the previous 5 years, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 6 years if the prior conviction was for a felony.

**Count 2: MAINTAINING A DRUG TRAFFICKING PLACE - PTAC, AS A PARTY TO A CRIME, REPEATER, SECOND AND SUBSEQUENT OFFENSE**

The above-named defendant on or around March 5, 2020, in the City of Ripon, Fond du Lac County, Wisconsin, as a party to a crime, did knowingly keep or maintain a dwelling which is resorted to by persons using controlled substances in violation of chapter 961 Wis. Stats., contrary to sec. 961.42(1), 939.50(3)(i), 939.05, 939.62(1)(b), 961.48(1)(b) 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.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of a felony in the previous 5 years, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 4 years if the prior conviction was for a felony.

And further, invoking the provisions of sec. 961.48(1)(b) Wis. Stats., because the defendant is a subsequent offender, having been convicted of a prior 961 offense, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 4 years.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

**Count 3: OBTAINING A CONTROLLED SUBSTANCE BY FRAUD, SECOND AND SUBSEQUENT OFFENSE**

The above-named defendant on or around March 6, 2020, in the City of Ripon, Fond du Lac County, Wisconsin, did obtain possession of a controlled substance, Suboxone, by fraud, contrary to sec. 961.43(1)(a), 939.50(3)(h), 961.48(1)(b) 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.

And further, invoking the provisions of sec. 961.48(1)(b) Wis. Stats., because the defendant is a subsequent offender, having been convicted of a felony in the previous 5 years, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 4 years.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

**Count 4: MAINTAINING A DRUG TRAFFICKING PLACE - PTAC, AS A PARTY TO A CRIME, REPEATER**

The above-named defendant on or around February 23, 2020, in the City of Ripon, Fond du Lac County, Wisconsin, as a party to a crime, did knowingly keep or maintain a dwelling which is resorted to by persons using controlled substances in violation of chapter 961 Wis. Stats., contrary to sec. 961.42(1), 939.50(3)(i), 939.05, 939.62(1)(b) 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.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of a felony in the previous 5 years, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 4 years if the prior conviction was for a felony.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

**Count 5: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, REPEATER**

The above-named defendant on or around February 23, 2020, in the City of Ripon, Fond du Lac County, Wisconsin, did recklessly endanger the safety of VICTIM 1, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.62(1)(c) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

And further, invoking the provisions of sec. 939.62(1)(c) Wis. Stats., because the defendant is a repeater, having been convicted of a felony in the previous 5 years, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 6 years if the prior conviction was for a felony.

**Count 6: MAINTAINING A DRUG TRAFFICKING PLACE, REPEATER**

The above-named defendant on or around April 9, 2020, in the City of Ripon, Fond du Lac County, Wisconsin, did knowingly keep or maintain a dwelling which is resorted to by persons using controlled substances in violation of chapter 961 Wis. Stats., contrary to sec. 961.42(1), 939.50(3)(i), 939.62(1)(b) 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.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of a felony in the previous 5 years, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 4 years if the prior conviction was for a felony.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

**Count 7: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, REPEATER**

The above-named defendant on or around April 9, 2020, in the City of Ripon, Fond du Lac County, Wisconsin, did recklessly endanger the safety of VICTIM 2, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.62(1)(c) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

And further, invoking the provisions of sec. 939.62(1)(c) Wis. Stats., because the defendant is a repeater, having been convicted of a felony in the previous 5 years, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 6 years if the prior conviction was for a felony.

**Count 8: MAINTAINING A DRUG TRAFFICKING PLACE, REPEATER**

The above-named defendant on or around April 17, 2020, in the City of Ripon, Fond du Lac County, Wisconsin, did knowingly keep or maintain a dwelling which is resorted to by persons using controlled substances in violation of chapter 961 Wis. Stats., contrary to sec. 961.42(1), 939.50(3)(i), 939.62(1)(b) 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.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of a felony in the previous 5 years, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 4 years if the prior conviction was for a felony.

And the Court may suspend the defendant's operating privileges for not less than six (6) months nor more than five (5) years. If the defendant's driving privileges are already suspended, any suspension imposed must be served consecutively.

**Count 9: FIRST DEGREE RECKLESSLY ENDANGERING SAFETY, REPEATER**

The above-named defendant on or around April 17, 2020, in the City of Ripon, Fond du Lac County, Wisconsin, did recklessly endanger the safety of VICTIM 2, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 939.62(1)(c) Wis. Stats., a Class F

Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

And further, invoking the provisions of sec. 939.62(1)(c) Wis. Stats., because the defendant is a repeater, having been convicted of a felony in the previous 5 years, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 6 years if the prior conviction was for a felony.

---

Date Signed: 06/23/23  
Electronically Signed By:  
Tessa Button  
Assistant District Attorney  
State Bar #: 1114495