

FILED
03-17-2026
Clerk of Circuit Court
Washington County, WI
2026CF000169
Honorable Michael S.
Kenitz
Branch 3

STATE OF WISCONSIN CIRCUIT COURT WASHINGTON COUNTY

STATE OF WISCONSIN
Plaintiff,

DA Case No.: 2026WA000820
Assigned DA/ADA: Nikole M Kane
Agency Case No.: 26-9832WCSD
Court Case No.:

vs.

Paul Henry David


CRIMINAL COMPLAINT

DOB: 11/18/1977
Sex/Race: M/W
Defendant,

For Official Use

The undersigned, being first duly sworn, states that:

Count 1: POSSESSION OF A FIREARM BY OUTSTATE FELON

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did possess a firearm, having been convicted of a crime elsewhere that would be a felony if committed in this state, contrary to sec. 941.29(1m)(b), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 2: POSSESSION OF A FIREARM BY OUTSTATE FELON

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did possess a firearm, having been convicted of a crime elsewhere that would be a felony if committed in this state, contrary to sec. 941.29(1m)(b), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 3: POSSESSION OF A FIREARM BY OUTSTATE FELON

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did possess a firearm, having been convicted of a crime elsewhere that would be a felony if committed in this state, contrary to sec. 941.29(1m)(b), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 4: POSSESSION OF A FIREARM BY OUTSTATE FELON

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did possess a firearm, having been convicted of a crime elsewhere that would be a felony if committed in this state, contrary to sec. 941.29(1m)(b), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 5: POSSESSION OF A FIREARM BY OUTSTATE FELON

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did possess a firearm, having been convicted of a crime elsewhere that would be a felony if committed in this state, contrary to sec. 941.29(1m)(b),

939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 6: POSSESSION OF A FIREARM BY OUTSTATE FELON

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did possess a firearm, having been convicted of a crime elsewhere that would be a felony if committed in this state, contrary to sec. 941.29(1m)(b), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 7: POSSESSION OF A FIREARM BY OUTSTATE FELON

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did possess a firearm, having been convicted of a crime elsewhere that would be a felony if committed in this state, contrary to sec. 941.29(1m)(b), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 8: POSSESSION OF A FIREARM BY OUTSTATE FELON

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did possess a firearm, having been convicted of a crime elsewhere that would be a felony if committed in this state, contrary to sec. 941.29(1m)(b), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 9: POSSESSION OF A FIREARM BY OUTSTATE FELON

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did possess a firearm, having been convicted of a crime elsewhere that would be a felony if committed in this state, contrary to sec. 941.29(1m)(b), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 10: POSSESSION OF A FIREARM BY OUTSTATE FELON

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did possess a firearm, having been convicted of a crime elsewhere that would be a felony if committed in this state, contrary to sec. 941.29(1m)(b), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 11: POSSESSION OF A FIREARM BY OUTSTATE FELON

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did possess a firearm, having been convicted of a crime elsewhere that would be a felony if committed in this state, contrary to sec. 941.29(1m)(b), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 12: POSSESSION OF A FIREARM BY OUTSTATE FELON

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did possess a firearm, having been convicted of a crime elsewhere that would be a felony if committed in this state, contrary to sec. 941.29(1m)(b),

939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 13: POSSESSION OF A FIREARM BY OUTSTATE FELON

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did possess a firearm, having been convicted of a crime elsewhere that would be a felony if committed in this state, contrary to sec. 941.29(1m)(b), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 14: POSSESSION OF FIREARM SILENCER

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did possess a firearm silencer, contrary to sec. 941.298(2), 939.50(3)(h) 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 15: MANUFACTURE/DELIVER THC (TETRAHYDROCANNABINOLS) (>200 - 1000G), USE OF A DANGEROUS WEAPON, POSSESSION WITH INTENT TO DELIVER/DISTRIBUTE A CONTROLLED SUBSTANCE ON OR NEAR A YOUTH CENTER

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did manufacture a controlled substance, to-wit: Tetrahydrocannabinols, in an amount of more than 200 grams but not more than 1000 grams, or more than 4 plants containing tetrahydrocannabinols but not more than 20 plants containing tetrahydrocannabinols, contrary to sec. 961.41(1)(h)2, 939.50(3)(h), 939.63(1)(b), 961.49(1m)(b)5 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. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while possessing a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

And further, invoking the provisions of sec. 961.49(1m)(b)5 Wis. Stats., because the above offense occurred within 1000 feet of a youth center or a community center, a girl scout campground, the maximum term of imprisonment prescribed by law for that crime may be increased by 5 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 16: POSSESSION WITH INTENT TO DELIVER THC, USE OF A DANGEROUS WEAPON, POSSESSION WITH INTENT TO DELIVER/DISTRIBUTE A CONTROLLED SUBSTANCE ON OR NEAR A YOUTH CENTER

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did possess with intent to deliver or distribute a controlled substance, to-wit: THC, in an amount of more than 200 grams but not more than 1,000 grams, or more than 4 plants containing tetrahydrocannabinols but not more than 20 plants containing tetrahydrocannabinols, contrary to sec. 961.41(1m)(h)2, 939.50(3)(h), 939.63(1)(c),

961.49(1m)(b)5 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. 939.63(1)(c) Wis. Stats., because the defendant committed this offense while possessing a dangerous weapon, the maximum term of imprisonment for the underlying crime may be increased by not more than four (4) years.

And further, invoking the provisions of sec. 961.49(1m)(b)5 Wis. Stats., because the above offense occurred within 1000 feet of a youth center or a community center, a girl scout campground, the maximum term of imprisonment prescribed by law for that crime may be increased by 5 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 17: POSSESSION WITH INTENT TO DELIVER PSILOCIN OR PSILOCYBIN (<=100G), USE OF A DANGEROUS WEAPON, POSSESSION WITH INTENT TO DELIVER/DISTRIBUTE A CONTROLLED SUBSTANCE ON OR NEAR A YOUTH CENTER

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did possess with intent to deliver a controlled substance, to-wit: Psilocybin, in an amount of less than 100 grams, contrary to sec. 961.41(1m)(g)1, 939.50(3)(g), 939.63(1)(b), 961.49(1m)(b)5 Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

And further, invoking the provisions of sec. 939.63(1)(b) Wis. Stats., because the defendant committed this offense while possessing a dangerous weapon, the maximum term of imprisonment for the felony may be increased by not more than 5 years.

And further, invoking the provisions of sec. 961.49(1m)(b)5 Wis. Stats., because the above offense occurred within 1000 feet of a youth center or a community center, a girl scout campground, the maximum term of imprisonment prescribed by law for that crime may be increased by 5 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 18: MAINTAINING A DRUG TRAFFICKING PLACE, USE OF A DANGEROUS WEAPON

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did knowingly keep or maintain a dwelling which is used for keeping, manufacturing, delivering or resorted to by people using controlled substances in violation of chapter 961 Wis. Stats., contrary to sec. 961.42(1), 939.50(3)(i), 939.63(1)(c) 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. 939.63(1)(c) Wis. Stats., because the defendant committed this offense while possessing a dangerous weapon, the maximum term of imprisonment for the underlying crime may be increased by not more than four (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 19: POSSESSION OF DRUG PARAPHERNALIA

The above-named defendant March 15, 2026 - March 16, 2026, in the Town of West Bend, Washington County, Wisconsin, did knowingly possess with primary intent to use drug paraphernalia to ingest, inhale, inject, prepare, store, or otherwise introduce a controlled substance into the human body, contrary to sec. 961.573(1) Wis. Stats., a Misdemeanor, and upon conviction may be fined not more than Five Hundred Dollars (\$500), or imprisoned for not more than thirty (30) days, or both.

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.

PROBABLE CAUSE:

Complainant prays that said defendant be dealt with according to law. Complainant is a sworn officer with the Washington County Sheriff's Department and bases their information upon review of the investigative reports of Investigators, Detectives, Sergeants, and Lieutenants of the Washington County Sheriff's Department, whom your complainant believes to be competent and reliable.

Said reports indicate that on March 15, 2026, Investigator Ausloos of the Washington County Sheriff's Department, was dispatched to a residence located at the Camp Silverbrook Girl Scout Camp, in the Town of West Bend, Washington County, Wisconsin.

Investigator Ausloos was advised by Sergeant Rodich that Officers located what was believed to be an indoor marijuana grow inside the residence while conducting a protective sweep of the residence after taking Paul Henry David, DOB 11/18/1977, hereinafter identified as the defendant into custody for a domestic-related charge. The defendant's wife provided consent for Officers to search the property in its entirety.

SEARCH OF THE RESIDENCE

During a search of the residence, in the hallway that led to the children's bedrooms, Investigator Ausloos located a closet just outside the children's bedrooms. Within that closet, Investigator Ausloos located two jars containing a green leafy substance that, based on his training and experience, he believed to be marijuana. The suspected marijuana was within easy reach of the juveniles, 8 years old and 16 years old, who reside in the home.

Within the residence, Investigators located the following thirteen firearms, all within the defendant's residence, while he is a convicted felon and unable to possess said firearms:

- Located in the landing area staircase towards the lower level, within a bag:
 - Ruger Model single six revolver chambered in 22 long rifle.
- Located under the bed in the defendant and his wife's bedroom:

- Ruger Mark II Target pistol chambered in .22 Long Rifle.
- Ruger 10-22 chambered in 22 long rifle.
- Mosin Nagant bolt-action rifle chambered in 7.62x54mmR.
- Henry lever-action chambered in .22 Long Rifle that was loaded.
- Remington 870 pump action shotgun chambered in 20 gauge
- Bushmaster AR-15 chambered in .223/5.56
- Benelli M1 Super chambered in 12 gauge
- Located at the foot of the bed within gun cases:
 - Remington Model 700 bolt-action rifle chambered in 300 Win Mag
 - Ruger M77 Mark 2 bolt action rifle chambered in 22-250
- Located next to the bed on the lower shelf of the nightstand:
 - Ruger Mark II semi-auto pistol chambered in 22 long rifle
- Located on top of the wooden closet next to the bed:
 - Winchester Model 37 chambered in 20 gauge. It was loaded with buckshot.
- Located in between the two closets:
 - JC Higgins Model 20 shotgun chambered in 12 gauge.

There was a small closet off of the bedroom, which when opened, appeared to have been converted into a marijuana grow operating containing seven marijuana plants. On the opposite side of the bedroom, there was a door to a storage closet, which inside contained a large tent, where two additional large marijuana plants were located.

Within the bedroom and under the bed, in addition to the firearms, Investigator Tripple located multiple jars containing a green leafy vegetable substance, that through Investigator Ausloos's training and experience, he believes to be marijuana. Under the bed, next to where some of the firearms were located, Investigators also located a small safe that was opened and had multiple documents with the defendant's name on them.

At the foot of the bed, there was a white twist-top bucket. Inside of the bucket, there were multiple black sealed bags containing a green leafy vegetable substance that Investigator Ausloos recognized through my training and experience, to be marijuana. Also, Investigators located a grey tote. Inside of it were multiple of the same bags containing a green leafy vegetable-like substance. Inside of the tote was a clear plastic bag containing new, unused black commercial packaging bags for the marijuana.

Based on Investigator Ausloos's training and experience knows that commercial packaging bags are items of drug paraphernalia as it is commonly used to store, or contain a controlled substance such as marijuana.

Detective Lee Goodman searched the dresser next to the bed. On top of the dresser the defendant's wallet was located with his Wisconsin ID card inside. Also on top of the dresser was marijuana paraphernalia and a green leafy vegetable substance that Investigator Ausloos recognized through my training and experience to be marijuana.

Inside the top drawer was the following items:

- A long black cylinder with a threaded end and an end with a hole in it that, through Investigator Ausloos's training and experience, he knows to be a suppressor for the end of a rifle.
- Two jars of mushrooms that, through Investigator Ausloos's training and experience, he believed to be Psilocybin mushrooms.
- Multiple packages of marijuana seeds to start growing more plants.

Throughout the residence, multiple pieces of drug paraphernalia were located and confiscated. In the main bedroom, seven plants were removed. In the storage area, there were two plants, for a total of nine, and two full growing operations.

FIELD TESTING

Investigator Ausloos tested and weighed all of the suspected narcotics located through the residence, as follows:

- Top of dresser 15.76g positive test for THC.
- Under the bed 226.11g positive test for THC.
- Plants from the bedroom grow a positive test for THC.
- Plants from the storage room grow a positive test for THC.
- Upstairs closet 86.66g positive test for THC.
- Grey tote at foot of bed 128.81g positive test for THC.
- White bucket by bed 230.40g positive test for THC.
- Suspected mushrooms located in the dresser, 39.10g, positive test for psilocybin
- The marijuana leaf clippings that were collected from the grow in the storage room were packaged and weighed at 347.97g.

The overall weight of the raw marijuana located is 687.74 grams, the psilocybin mushroom is 39.10 gram, and 9 marijuana plants.

During the investigation, it was determined that the defendant was producing, cultivating and manufacturing marijuana in the basement of his residence. The defendant had two separate grow sites, seeds to grow new plants and there was evidence that he was processing the plants. The defendant also had a substantial amount of already processed marijuana, 687.74 grams, which through Investigator Ausloos's training and experience he believes to be substantially more than personal use. The defendant also had marijuana within arm's reach of both juveniles in the upstairs closet in the hallway right outside their bedrooms.

The defendant also had 39.10 grams of psilocybin mushrooms that through Investigator Ausloos's training and experience, he believes to be substantially more than personal use.

Investigator Ausloos is aware that the defendant is a convicted felon, was in possession of 13 firearms that were not secured away from the juveniles with one even hanging in a shoulder bag in the hallway where the youngest juvenile could have accessed. The defendant was also in possession of a suppressor as a felon.

Investigator Ausloos also noted that the defendant was conducting this all on the Camp Silverbrook, Girl Scout Campgrounds located in the Town of West Bend, Washington County, Wisconsin. Your complainant is aware that this is a campground for youth and girl scout

troops, and based on it being on the campground property, this residence and the marijuana grow site is operating within 1,000 feet of a youth center.

Your complainant is aware that the defendant has 4 prior OWI related offenses in the State of Wisconsin, with his most recent OWI 4th offense conviction being from 2010. Your complainant is also aware that on December 8, 2022, the defendant was convicted of DUI Alcohol/Drugs, in the State of Illinois and sentenced to 3 years imprisonment concurrent. Your complaint is aware that this 2022 Illinois DUI conviction is a felony offense, and also is an offense which would be a felony if committed in the state of Wisconsin.

The reports of the Washington County Sheriff's Department are accurate and reliable in that their reports are based on an official law enforcement investigation.

All of this occurred within Washington County, Wisconsin.

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

Subscribed and sworn to before me on 03/17/26

Electronically Signed By:

Nikole M Kane

Assistant District Attorney

State Bar #: 1122409

Electronically Signed By:

Det. Sgt. Donald Kapla

Complainant