

E-FILED 2020 FEB 19 10:45 AM HAMILTON - CLERK OF DISTRICT COURT
IN THE IOWA DISTRICT COURT IN AND FOR
HAMILTON COUNTY

This Complaint and Affidavit is to be:

- Filed with Court Clerk (cc: CA)
 Submitted to County Attorney
 Filed with JCO - Defendant is a Juvenile

Agency Case Number: 2018017039

Arrest Date: _____

THE STATE OF IOWA

VS.

OFFENDER

Last MULHOLLAND		First LEAH		Middle RAE		Suffix	
Address 1005 WOOLSEY AVE				City WEBSTER CITY		State IA	Zip Code 50595
DL# [REDACTED]	State IA	DL Class C	DL Endorsements		DL Restrictions B		
Date of Birth 12/08/1979	Gender FEMALE		Race WHITE - W		Ethnicity NOT OF HISPANIC ORIGIN - N		
Height 5' 06"	Weight 200 LBS		Eye Color BLUE - BLU		Hair Color		

OFFENSE

State <input checked="" type="checkbox"/>	County <input type="checkbox"/>	Local <input type="checkbox"/>	Code Section 706A.2(1)	Crime Description ONGOING CRIMINAL CONDUCT - INFLUENCE ENTERPRISE			Speed	in	Zone
Class FELB			Serious P.I. <input type="checkbox"/>	Fatal Accident <input type="checkbox"/>	Civil Damage Assessment <input type="checkbox"/>	Other <input type="checkbox"/>			
Location Type 05 - COMMERCIAL/OFFICE BUILDING									
Literal Description WEBSTER CITY AREA CHAMBER OF COMMERCE									
Address 628 SECOND STREET			City WEBSTER CITY			State IA	Zip Code 50595		
Is Date and Time of Incident Known? NO		Incident Date or Low Range 03/16/2015		Upper Date Range 06/22/2018		Incident Time or Low Range 08:00		Upper Time Range 16:00	

STATUS OF OFFENDER/JUVENILE

<input type="checkbox"/> TAKEN INTO CUSTODY	CUSTODY	<input type="checkbox"/> SUMMONS TO APPEAR (Citation Issued)
<input checked="" type="checkbox"/> WARRANT REQUESTED	<input type="checkbox"/> NO CONTACT ORDER REQUESTED	<input type="checkbox"/> RELEASED TO PARENT/GUARDIAN

NARRATIVE

Narrative of Offense Committed
 On or about the above stated date and time, the Defendant did
 knowingly conduct the affairs of an enterprise through a specified unlawful activity

VICTIM INFORMATION (Optionally displayed, especially if NCO is requested)

Last		First		Middle		Suffix	
Business/Organization/State/County/Municipality Name WEBSTER CITY AREA CHAMBER OF COMMERCE							
Address 628 SECOND STREET				City WEBSTER CITY		State IA	Zip 50595

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Height 5' 06"		Weight 200 LBS		Eye Color BLUE - BLU		Hair Color	

OFFENSE

State <input checked="" type="checkbox"/>	County <input type="checkbox"/>	Local <input type="checkbox"/>	Code Section 714.2(1)	Crime Description THEFT 1ST DEGREE			Speed	in	Zone
Class FELC			Serious P.I. <input type="checkbox"/>	Fatal Accident <input type="checkbox"/>	Civil Damage Assessment <input type="checkbox"/>		Other <input type="checkbox"/>		
Location Type 05 - COMMERCIAL/OFFICE BUILDING									
Literal Description WEBSTER CITY AREA CHAMBER OF COMMERCE									
Address 628 SECOND STREET				City WEBSTER CITY		State IA	Zip Code 50595		
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STATUS OF OFFENDER/JUVENILE

<input type="checkbox"/> TAKEN INTO CUSTODY		CUSTODY		<input type="checkbox"/> SUMMONS TO APPEAR (Citation Issued)	
<input checked="" type="checkbox"/> WARRANT REQUESTED		<input type="checkbox"/> NO CONTACT ORDER REQUESTED		<input type="checkbox"/> RELEASED TO PARENT/GUARDIAN	

NARRATIVE

Narrative of Offense Committed
 On or about the above stated date and time, the Defendant did
 take possession of cash in excess of \$10,000 belonging to the Webster City Chamber of Commerce with the intent to deprive it there of

VICTIM INFORMATION (Optionally displayed, especially if NCO is requested)

Last		First		Middle		Suffix	
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DL# [REDACTED]	State IA	DL Class C	DL Endorsements		DL Restrictions B		
Date of Birth 12/08/1979	Gender FEMALE	Race WHITE - W		Ethnicity NOT OF HISPANIC ORIGIN - N			
Height 5' 06"	Weight 200 LBS	Eye Color BLUE - BLU		Hair Color			

OFFENSE

State <input checked="" type="checkbox"/>	County <input type="checkbox"/>	Local <input type="checkbox"/>	Code Section 715A.2(2)(A)	Crime Description FORGERY		Speed	in	Zone
Class FELD		Serious P.I. <input type="checkbox"/>		Fatal Accident <input type="checkbox"/>		Civil Damage Assessment <input type="checkbox"/>		Other <input type="checkbox"/>
Location Type 05 - COMMERCIAL/OFFICE BUILDING								
Literal Description WEBSTER CITY AREA CHAMBER OF COMMERCE								
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STATUS OF OFFENDER/JUVENILE

<input type="checkbox"/> TAKEN INTO CUSTODY	CUSTODY	<input type="checkbox"/> SUMMONS TO APPEAR (Citation Issued)
<input checked="" type="checkbox"/> WARRANT REQUESTED	<input type="checkbox"/> NO CONTACT ORDER REQUESTED	<input type="checkbox"/> RELEASED TO PARENT/GUARDIAN

NARRATIVE

Narrative of Offense Committed
 On or about the above stated date and time, the Defendant did fraudulently use or utter a writing, to-wit: check, draft, or other writing, knowing that said writing was forged by altering, completing, authenticating, issuing or transferring to be the act of another without their permission

VICTIM INFORMATION (Optionally displayed, especially if NCO is requested)

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Business/Organization/State/County/Municipality Name WEBSTER CITY AREA CHAMBER OF COMMERCE								
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Height 5' 06"		Weight 200 LBS	Eye Color BLUE - BLU		Hair Color		

OFFENSE

State <input checked="" type="checkbox"/>	County <input type="checkbox"/>	Local <input type="checkbox"/>	Code Section 715A.6(2)(B)	Crime Description UNAUTHORIZED USE OF CREDIT CARD OVR \$1500 UND 10,000		Speed	in	Zone
Class FELD		Serious P.I. <input type="checkbox"/>	Fatal Accident <input type="checkbox"/>	Civil Damage Assessment <input type="checkbox"/>	Other <input type="checkbox"/>			
Location Type 05 - COMMERCIAL/OFFICE BUILDING								
Literal Description WEBSTER CITY AREA CHAMBER OF COMMERCE								
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<input checked="" type="checkbox"/> WARRANT REQUESTED	<input type="checkbox"/> NO CONTACT ORDER REQUESTED	<input type="checkbox"/> RELEASED TO PARENT/GUARDIAN	

NARRATIVE

Narrative of Offense Committed
 On or about the above stated date and time, the Defendant did use a credit card, which includes a debit card, to obtain property or services, valued in excess of \$1,500 but not in excess of \$10,000, knowing that the credit card was used without authorization

VICTIM INFORMATION (Optionally displayed, especially if NCO is requested)

Last		First		Middle		Suffix	
Business/Organization/State/County/Municipality Name WEBSTER CITY AREA CHAMBER OF COMMERCE							
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AFFIDAVIT

STATE OF IOWA, HAMILTON COUNTY

I, the undersigned, being duly sworn, state that all facts contained in this Complaint and Affidavit, known by me or told to me by other reliable persons form the basis for my belief that the defendant committed this crime

State all facts and persons relied upon supporting elements of alleged crime

The defendant LEAH RAE MULHOLLAND was employed by Webster City Area Chamber of Commerce as a financial and administrative assistant from October 16, 2013 until June 18, 2018. As the Administrative Assistance, LEAH was responsible for the following functions:

Receipts opening mail, collecting receipts, posting all collections to the account records, and preparing and making bank deposits;

Disbursements making certain purchases for Chamber purposes, maintaining supporting documentation; preparing, signing and distributing checks; and posting disbursements to the accounting records;

Payroll calculating payroll amounts, preparing, signing and distributing checks, posting payments to the accounting records and filing required payroll reports and

Bank accounts receiving and reconciling monthly bank statements to accounting records.

The Chamber's primary revenue sources include membership/sponsorship dues, hotel/motel tax funds provided annually by the City of Webster City and proceeds from fund raising events. The Chamber established 4 bank accounts, including a primary checking account used for most Chamber operations and a money market savings account. Separate accounts were opened for the revolving loans issued by the Chamber and the Chamber Bucks Program.

On June 15, 2018, the Chamber's Executive Director identified discrepancies when reviewing the current monthly bank statements. Specifically, the Executive Director identified unauthorized checks issued from the Chamber's account to LEAH. On June 18, 2018, the Executive Director and 2 Board Members met with LEAH to discuss the concerns. During the meeting, LEAH admitted to the misuse of funds and was immediately terminated from her position.

During an investigation it was discovered that LEAH had issued 247 unauthorized checks totaling \$149,141.80 from March of 2015 through June 2018. On those checks, LEAH used the signature stamp of the Executive Director, without permission and had forged the signature of a Chamber Board member/City of Webster City Planning Director, Karla Wetzler. Out of the 247 unauthorized checks, 235 checks were issued directly to LEAH and cashed by her, totaling \$136,772.90. LEAH had attempted to disguise some of the checks as payroll and the others were issued without any description. The remaining 12 checks were issued to a variety of places to further LEAH's attempts to disguise her illegal activities.

In addition to the unauthorized/forged checks, LEAH used the Chamber's debit card for unauthorized/personal purchases. LEAH's debit card purchases exceeded \$1,500.00 but did not exceed \$10,000.00. Examples of the purchases made by LEAH using the Chamber's debit card include:

Payments to cell phone providers. The chamber did not issue cell phones to employees and it was not the policy of the Chamber to pay for employee's personal cell phone bills.

Payment to a credit card company. The Chamber did not have a credit card.

Payments to Google Jam City for cell phone games/music

Payments to inmate telephone services.



ELY, SCOT

1057

Signature of Complainant or Officer. Officer Name & Number

GENERAL PROBABLE CAUSE

Defendant Implicated

02 - CAUGHT IN ACT, 03 - ADMISSION/STATEMENTS, 07 - IDENTIFIED BY WITNESSES, 14 - OTHER PHYSICAL EVIDENCE

Operating Motor Vehicle in County


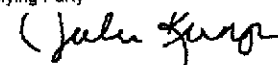
Other Physical Evidence

Attempted To Inflict Injury

DIGITAL RECORDS/BANK RECORDS/VIDEO

STATE OF IOWA,

HAMILTON COUNTY

	Subscribed and sworn to before me by the person(s) signing the Complaint and Affidavit(s) on 02/19/2020	
	Notary Name	JULIE RUNYON
	Commission Number	743126
	My Commission Expires	09/29/2021
		Signature of Verifying Party
		
		<input type="checkbox"/> Peace Officer <input checked="" type="checkbox"/> Notary <input type="checkbox"/> Prosecuting Attorney