

FILED

MAR 31 2016

STATE OF SOUTH DAKOTA SOUTH DAKOTA UNIFIED JUDICIAL SYSTEM
5TH CIRCUIT CLERK OF COURT

IN CIRCUIT COURT

COUNTY OF BROWN

By



FIFTH JUDICIAL CIRCUIT

STATE OF SOUTH DAKOTA,
Plaintiff,

CRIM. NO. 16-383

vs.

COMPLAINT

JOOP BOLLEN,
DOB: 04/13/1963
Defendant.

The undersigned, being duly sworn upon oath charges that, in the County of Brown, State of South Dakota, Joop Bollen did commit the public offenses of:

Count 1

That on or about the 2nd day of February, 2012, in the County of Brown, State of South Dakota, Joop Bollen did commit the public offense of Unauthorized Disposal of Personal Property Subject to Security Interest (SDCL 44-1-12), in that Joop Bollen did willfully destroy, conceal, sell, or in any manner dispose of or materially injure any part of the property covered by such mortgage, conditional sales agreement, or security agreement without the written consent of the holder of such mortgage, conditional sales agreement, or security agreement to-wit: Joop Bollen disposed of \$300,000 from Indemnification Fund 2 not in accordance with the security agreement executed with the South Dakota Department of Tourism and State Development, and failing to notify the holder of the security agreement and not in accordance with the usual and customary use of the property while the

security agreement remained in force contrary to statute in such case made and provided against the peace and dignity of the State of South Dakota.

Count 2

That on or about the 30th day of April, 2012, in the County of Brown, State of South Dakota, Joop Bollen did commit the public offense of Unauthorized Disposal of Personal Property Subject to Security Interest (SDCL 44-1-12), in that Joop Bollen did willfully destroy, conceal, sell, or in any manner dispose of or materially injure any part of the property covered by such mortgage, conditional sales agreement, or security agreement without the written consent of the holder of such mortgage, conditional sales agreement, or security agreement to-wit: Joop Bollen disposed of \$370,000 from Indemnification Fund 2 not in accordance with the security agreement executed with the South Dakota Department of Tourism and State Development, and failing to notify the holder of the security agreement and not in accordance with the usual and customary use of the property while the security agreement remained in force contrary to statute in such case made and provided against the peace and dignity of the State of South Dakota.

Count 3

That on or about the 30th day of April, 2012, in the County of Brown, State of South Dakota, Joop Bollen did commit the public offense of Unauthorized Disposal of Personal Property Subject to Security Interest (SDCL 44-1-12), in that Joop Bollen did willfully destroy, conceal, sell, or in any manner dispose of or materially injure any part of the property covered by such

mortgage, conditional sales agreement, or security agreement without the written consent of the holder of such mortgage, conditional sales agreement, or security agreement to-wit: Joop Bollen disposed of \$96,838.74 from Indemnification Fund 2 not in accordance with the security agreement executed with the South Dakota Department of Tourism and State Development, and failing to notify the holder of the security agreement and not in accordance with the usual and customary use of the property while the security agreement remained in force contrary to statute in such case made and provided against the peace and dignity of the State of South Dakota.

Count 4

That on or about the 7th day of May, 2012, in the County of Brown, State of South Dakota, Joop Bollen did commit the public offense of Unauthorized Disposal of Personal Property Subject to Security Interest (SDCL 44-1-12), in that Joop Bollen did willfully destroy, conceal, sell, or in any manner dispose of or materially injure any part of the property covered by such mortgage, conditional sales agreement, or security agreement without the written consent of the holder of such mortgage, conditional sales agreement, or security agreement to-wit: Joop Bollen disposed of \$166,606.89 from Indemnification Fund 2 not in accordance with the security agreement executed with the South Dakota Department of Tourism and State Development, and failing to notify the holder of the security agreement and not in accordance with the usual and customary use of the property while the

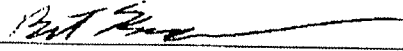
security agreement remained in force contrary to statute in such case made and provided against the peace and dignity of the State of South Dakota.

Count 5

That on or about the 19th day of June, 2012, in the County of Brown, State of South Dakota, Joop Bollen did commit the public offense of Unauthorized Disposal of Personal Property Subject to Security Interest (SDCL 44-1-12), in that Joop Bollen did willfully destroy, conceal, sell, or in any manner dispose of or materially injure any part of the property covered by such mortgage, conditional sales agreement, or security agreement without the written consent of the holder of such mortgage, conditional sales agreement, or security agreement to-wit: Joop Bollen disposed of \$310,000 from Indemnification Fund 2 not in accordance with the security agreement executed with the South Dakota Department of Tourism and State Development, and failing to notify the holder of the security agreement and not in accordance with the usual and customary use of the property while the security agreement remained in force contrary to statute in such case made and provided against the peace and dignity of the State of South Dakota. contrary to the statute in such case made and provided against the peace and dignity of the State of South Dakota.

That this Complaint is based on the Affidavit of Division of Criminal Investigation Special Agent Jon Bierne, a copy of which is attached hereto and fully incorporated herein.


Dated this 30th day of March, 2016, at Pierre, South Dakota.


BRENT KEMPEMA
Assistant Attorney General

Subscribed and sworn to before me, a Notary Public on this 30th day of March, 2016.

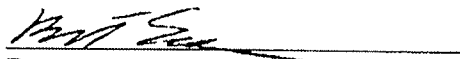
(SEAL)




Notary Public
My Commission expires: 9-12-2017

REQUEST FOR WARRANT OF ARREST

Brent Kempema, the undersigned Prosecuting Attorney, hereby requests that a Warrant of Arrest be issued based upon the Complaint set forth hereinabove.


Brent Kempema, Prosecuting Attorney
Assistant Attorney General