

**FILED**  
**11-08-2024**  
**Ozaukee County, WI**  
**Connie Mueller CoCC**  
**2024CF000412**  
**Honorable Steven M. Cain**  
**Branch 2**

**STATE OF WISCONSIN                      CIRCUIT COURT                      OZAUKEE COUNTY**

STATE OF WISCONSIN  
Plaintiff,                      DA Case No.: 2024OZ002215  
Assigned DA/ADA: Kristian K. Lindo

vs.

Court Case No.: 2024CF

GUANGGUO ZHU

Chicago, IL 60616  
DOB: /1971  
Sex/Race: M/A  
Alias:

**CRIMINAL COMPLAINT**

Defendant(s).

*For Official Use*

The undersigned law enforcement officer being first duly sworn, states that:

**Count 1: UTTERING A FORGERY**

The above-named defendant on or about Thursday, November 7, 2024, in the Village of Grafton, Ozaukee County, Wisconsin, did possess with intent to utter as genuine, any forged or altered writing or writing of a kind whereby legal rights and obligations are created, knowing the writing to have been falsely altered, contrary to sec. 943.38(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 2: UTTERING A FORGERY**

The above-named defendant on or about Thursday, November 7, 2024, in the Village of Grafton, Ozaukee County, Wisconsin, did possess with intent to utter as genuine, any forged or altered writing or writing of a kind whereby legal rights and obligations are created, knowing the writing to have been falsely altered, contrary to sec. 943.38(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 3: UTTERING A FORGERY**

The above-named defendant on or about Thursday, November 7, 2024, in the Village of Grafton, Ozaukee County, Wisconsin, did possess with intent to utter as genuine, any forged or altered writing or writing of a kind whereby legal rights and obligations are created, knowing the writing to have been falsely altered, contrary to sec. 943.38(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 4: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS**

The above-named defendant on or about Thursday, November 7, 2024, in the Village of Grafton, Ozaukee County, Wisconsin, did possess with intent to use identifying information or documents, of Visa to obtain money without the entity's authorization or consent by representing that he was the entity or was acting with the authorization or consent of the entity, contrary to sec. 943.203(2)(a), 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 5: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS**

The above-named defendant on or about Thursday, November 7, 2024, in the Village of Grafton, Ozaukee County, Wisconsin, did possess with intent to use identifying information or documents, of Macy's to obtain money without the entity's authorization or consent by representing that he was the entity or was acting with the authorization or consent of the entity, contrary to sec. 943.203(2)(a), 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 6: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS**

The above-named defendant on or about Thursday, November 7, 2024, in the Village of Grafton, Ozaukee County, Wisconsin, did possess with intent to use identifying information or documents, of Amazon to obtain money without the entity's authorization or consent by representing that he was the entity or was acting with the authorization or consent of the entity, contrary to sec. 943.203(2)(a), 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 7: FINANCIAL TRANSACTION CARD - FORGERY (ALTERATION, ETC.)**

The above-named defendant on or about Thursday, November 7, 2024, in the Village of Grafton, Ozaukee County, Wisconsin, did with intent to defraud the purported issuer a person or organization providing money, goods, services or anything else of value or any other person possess a financial card or purported financial card with the knowledge that it has been altered or counterfeited. The possession of a person other than the purported issuer of two or more financial transaction cards which have been altered or counterfeited as prima facie evidence that the person intended to defraud or that the person knew the financial transaction cards to have been so altered or counterfeited, contrary to sec. 943.41(4)(a), 939.50(3)(i) 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.

**PROBABLE CAUSE**

I am an Ozaukee County Sheriff's Deputy and base this complaint upon my review of Grafton Police Department incident reports whose reports are of the type I have relied upon in the past and found to be truthful and reliable. Said reports state as follows:

On November 7, 2024, Village of Grafton Police Officer Melissa Brandt was dispatched to the Walgreens, located at 1915 Wisconsin Avenue, in the Village of Grafton, Ozaukee County, for a fraud complaint.

The store manager reported a middle aged Asian male, came into the store and placed several forged/altered gift cards onto the gift card rack. The male, later identified as the above named defendant, walked around the store and entered a gray Lexus SUV, with Illinois plates DQ48893.

Officer Brandt met with the manager who identified the gift cards placed on the rack by the defendant. The manager stated due to widespread fraud and scams involving gift cards, Walgreens did a reset of the gift cards issued for sale. The manager showed Officer Brandt the backs of the valid gift cards, which were different than the backs of the cards the defendant put on the rack. The cards put on the rack by the defendant were no longer in circulation or sold by Walgreens.

Officer Brandt was notified the Walgreens in Cedarburg, located at W62N190 Washington Avenue, in the City of Cedarburg, Ozaukee County, also reported the defendant was at their store. Cedarburg

Police Officers Thomas Develice and Samuel Peters were able to initiate a traffic stop as the defendant was leaving the property. Officer Brandt responded to the traffic stop.

The defendant did not speak English so Officer Develice used a translating system to attempt to communicate with the defendant in Mandarin. Using the translating device, Officer Brandt informed the defendant he was going to be arrested and to get out of the car. The defendant denied doing anything wrong. When told to exit again, the defendant did so and was placed into custody.

When the defendant was getting out of the car, Officer Brandt noted several gift cards in the driver's door pocket.

Officers Jonathan Schemenauer and Peters searched the vehicle and recovered the gift cards in the driver's side door, various identification cards with the defendant's name on it, and two duffle bags filled with gift cards.

Officer Brandt reviewed surveillance from the Walgreens in Grafton. That video showed the Lexus pulling into the parking lot at 1:12 pm. At 1:14 pm, the defendant enters the store and walks to the racks of gift cards. At 1:15 pm, the defendant places several gift cards onto one of the lower racks. At 1:19 pm, the defendant leaves the store.

Cedarburg officers found similar, out of circulation, gift cards on the rack at the Cedarburg Walgreens.

Officer Brandt discovered the defendant had 1,807 gift cards in his possession. Many of the gift cards were in bundles, wrapped in rubber bands

Duffle Bag 1 contained:

- 122 Visa gift cards with a value of \$100.00
- 154 Visa gift cards with a value of \$50.00
- 143 Visa gift cards with a value of \$20.00 - \$500.00
- 14 Visa gift cards with a value of \$20.00 - \$100.00
- 92 Nike gift cards with a value of \$25.00 - \$500.00
- 10 Apple gift cards with a value of \$10.00 - \$500.00
- 12 Razor gift cards with a value of \$10.00 - \$200.00
- 56 Macy's gift cards with a value of \$25.00 - \$200.00
- 6 Sephora gift cards with a value of \$25.00 - \$200.00
- 21 Nordstrom gift cards with a value of \$25.00 - \$500.00

Duffle Bag 2 contained:

- 14 Visa gift cards with a value of \$100.00
- 20 Visa gift cards with a value of \$50.00
- 17 Visa gift cards with a value of \$20.00 - \$500.00
- 2 Visa gift cards with a value of \$20.00 - \$100.00
- 29 Xbox gift cards with a value of \$10.00 - \$250.00
- 26 Xbox gift cards with a value of \$100.00
- 26 Xbox gift card with a value of \$50.00
- 50 Nike gift cards with a value of \$25.00 - \$500.00
- 52 Dicks gift cards with a value of \$25.00 - \$200.00
- 4 eBay gift cards with a value of \$25.00 - \$200.00
- 47 eBay gift cards with a value of \$25.00 - \$500.00
- 56 Nordstrom gift cards with a value of \$25.00 - \$500.00
- 26 Amazon gift cards with a value of \$100.00
- 42 Amazon gift cards with a value of \$50.00
- 53 Amazon gift cards with a value of \$25.00 - \$500.00
- 65 Bath and Body Works gift cards with a value of \$25.00 - \$500.00

65 Sephora gift cards with a value of \$25.00 - \$250.00  
47 Home Depot gift cards with a value of \$25.00 - \$500.00  
31 Home Depot gift cards with a value of \$100.00  
65 Macy's gift cards with a value of \$25.00 - \$200.00

In the driver's door:

4 Nike gift cards with a value of \$25.00 - \$500.00  
4 Nordstrom gift cards with a value of \$25.00 - \$500.00  
4 Dick's gift cards with a value of \$25.00 - \$500.00  
2 Xbox gift cards with a value of \$50.00  
2 Xbox gift cards with a value of \$100.00  
2 Xbox gift cards with a value of \$10.00 - \$250.00

Upon information and belief, none of the gift cards have yet been loaded with money.

Grafton Police Detective Justin Gehm is aware of a common gift card scam in which nefarious parties are able to obtain gift cards, either via theft or inside sources. The packaging for the gift cards is meticulously cut open and the gift card is removed. The parties then remove the "scratch off" coating to reveal the gift cards identification numbers. Once the numbers are documented, the identification number is covered back up and the gift card is reinserted into the packaging. Finally, the packaging is sealed. Once prepared and ready, the cards are re-stocked onto gift card racks, waiting for customers to purchase the gift cards.

When the cards are purchased, they are either loaded with the set amount of funds or the customer can choose how much money, within the range, to load the card with. The scammers are then able to obtain the funds loaded onto the card for their own benefit. The party receiving the gift card will learn their card has no funds on it, when they ultimately try to use the gift card.

Walgreens corporate is well aware of this scam, which is why they took the older gift cards out of circulation.

Grafton Police Detective Sergeant Dustin Cline reports that, at the time of this complaint, approximately sixty (60) of the recovered gift cards have been opened and officers confirmed the packaging has been tampered with and the "scratch off" coating on the identification numbers has been removed.

Cedarburg Police Detective Nathan Butzler ran a Flock search of the defendant's vehicle. The Flock revealed that, in the past 30 days, the defendant's vehicle was located in the Chicagoland area, Green Bay, Appleton, Oshkosh, Sheboygan, South Bend, and Indianapolis. Officers impounded the defendant's vehicle and noted it was manufactured in 2022 and the odometer showed 99,590 miles on it.

Officers learned the defendant currently resides in Chicago and is a Chinese citizen.

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

Subscribed and sworn to before me on 11/08/24

Electronically Signed By:

Kristian K. Lindo

Assistant District Attorney

State Bar #: 1089021

Electronically Signed By:

Deputy Paul D. Neumyer

Complainant