

INFORMATION

JD-CR-71 Rev. 3-11

**STATE OF CONNECTICUT
SUPERIOR COURT**

Disposition date

Police Case number
2011-00295

Agency name
Division of Criminal Justice

Agency number
5700
Title, Allegation and Counts

State of Connecticut vs. (Name of accused) McKinnie, Sandra, R. DOB 05/14/1963		Residence (Town) of accused New Haven	Docket number
Address 699 Fountain Street, New Haven, CT		Date of birth 05/14/63	The undersigned Prosecuting Authority of the Superior Court of the State of Connecticut charges that:
To be held at (Town) New Haven		Geographical area number 23	
Count One — Did commit the offense of: Larceny in the first degree by embezzlement/public community		Continued to	Purpose
At (Town) New Haven	On or about (Date) 8/12/2008 - 10/28/2008	In violation of General Statute number 53a-122(a(4))	Reason
Count Two — Did commit the offense of: Improper payment from campaign treasury			
At (Town) New Haven	On or about (Date) 8/12/2008 - 10/12/2008	In violation of General Statute number 9-623/9-607(e)	
Count Three — Did commit the offense of: Failure to preserve campaign treasury records for required period			
At (Town) New Haven	On or about (Date) 02/09/2012	In violation of General Statute number 9-623/9-607(f)	

☐ See other sheet for additional counts Date **9/18/2012** Signed (Prosecuting Authority) **Jamboungue, S.A.S.A.**

Court Action

Defendant advised of rights before plea		Bond	Surety	<input type="checkbox"/> 10 %	Election (Date)
(Judge)	(Date)			<input type="checkbox"/> Cash	<input type="checkbox"/> CT <input type="checkbox"/> JY
<input type="checkbox"/> Attorney <input type="checkbox"/> Public defender	Guardian	Bond change		Seized property inventory number	

Count	Plea date	Plea	Plea withdrawn		Verdict finding	Fine	Remit	Additional disposition
			Date	New plea				
1						\$	\$	
2						\$	\$	
3						\$	\$	

Date	Other Court Action	Judge

Receipt number	Cost <input type="checkbox"/> IMP <input type="checkbox"/> NCI	Bond information <input type="checkbox"/> Bond forfeited <input type="checkbox"/> Forfeiture vacated <input type="checkbox"/> Forfeiture vacated and bond reinstated
Application fee - receipt number if paid	Circle one W I Q	Program fee - receipt number if paid
Prosecutor on original disposition	Reporter/monitor on original disposition	Signed (Clerk)
		Signed (Judge)

ARREST WARRANT APPLICATIONJD-CR-64b Rev. 3-11
C.G.S. § 54-2a
Pr. Bk. Sec. 36-1, 36-2, 36-3**STATE OF CONNECTICUT
SUPERIOR COURT**
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For Court Use Only

Supporting Affidavits sealed

☐ Yes ☐ No

Police Case number 2011-00295	Agency name Division of Criminal Justice	Agency number 5700
Name (Last, First, Middle Initial) McKinnie, Sandra, R. DOB 05/14/1963	Residence (Town) of accused New Haven	Court to be held at (Town) New Haven
		Geographical Area number 23

Application For Arrest Warrant

To: A Judge of the Superior Court

The undersigned hereby applies for a warrant for the arrest of the above-named accused on the basis of the facts set forth in the: ☒ Affidavit Below. ☐ Affidavit(s) Attached.

Date 9/18/12	Signed (Prosecuting authority) <i>Tamberlyn Conopack</i>	Type/print name of prosecuting authority Tamberlyn Conopack
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Affidavit

The undersigned affiant, being duly sworn, deposes and says:

1. The affiant, Inspector Gregory Zigmont, is assigned to the Financial Crimes Bureau of the Office of the Chief State's Attorney and has more than twenty nine years experience in law enforcement and criminal investigations. The affiant has received specialized training in forensic science and criminal investigation and has investigated cases similar to the one set forth below.
2. During December, 2011, the Division of Criminal Justice, Office of the Chief State's Attorney received a letter of complaint from the Connecticut State Elections Enforcement Commission, (SEEC). The letter, authored by Legal Program Director Shannon Kief, was a referral, for criminal prosecution into the activities of Sandra McKinnie. McKinnie was the committee treasurer of record for the campaign of then candidate Gary Holder-Winfield for the 94th state assembly district seat in the August 11, 2008 primary and the November 4, 2008 election. The campaign was titled "Winfield 2008." The letter of complaint states that the Commission's Campaign Disclosure and Audit Unit had performed a post-election audit and then made a referral for investigation. Pursuant to the subsequent investigation by the State Elections Enforcement Commission, the commission believed that McKinnie wrongfully took, obtained or withheld public funds that were under her care, and also violated campaign finance statutes. The public funds were from a Citizen's Election Fund campaign grant from the State of Connecticut, in the amount of \$24,977.44, received by the "Winfield 2008" campaign on 7/24/2008. An audit report, summary of investigation, as well as supporting documents were included with the letter of complaint.
3. Kief's letter states that Staff Attorney Kevin Ahern and Lead Legal Investigator Charles Urso conducted the investigation for the SEEC. Their investigation included the examination of campaign documents, including financial disclosure statements required by section 9-608 of the Connecticut General Statutes, submitted for "Winfield 2008," interviewing Gary Holder-Winfield,

(This is page 1 of a 6 page Affidavit.)

Date 9/12/12	Signed (Affiant) <i>Gregory Zigmont, Inspector</i>
Jurat Subscribed and sworn to before me on (Date) 09-12-2012	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <i>Sup. J. Bannan</i>

Finding

The foregoing Application for an arrest warrant, and affidavit(s) attached to said Application, having been submitted to and considered by the undersigned, the undersigned finds from said affidavit(s) that there is probable cause to believe that an offense has been committed and that the accused committed it and, therefore, that probable cause exists for the issuance of a warrant for the arrest of the above-named accused.

Date and Signature <i>[Signature]</i>	Signed at (City or town) New Haven	On (Date) 9/18/12	Signed (Judge/Judge Trial Referee) <i>[Signature]</i>	Name of Judge/Judge Trial Referee Keegan
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ARREST WARRANT APPLICATION

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Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
McKinnie, Sandra, R. DOB 05/14/1963	New Haven	New Haven	23

Affidavit - Continued

acquiring the bank statements for the campaign account, as well as attempting to interview Sandra McKinnie.

4. One of the documents included in the complaint packet, was the "Recommendation of Counsel," which was based on the investigative findings of Attorney Ahern and Investigator Urso. Contained within the recommendation document were findings of violations of the state's election regulations. Most significant among these findings were forty three cash transactions totalling \$4,270 listed on the bank statements. These forty three transactions were not listed on the financial disclosure statement that was submitted after the August 11, 2008 primary. These transactions consisted of ATM and over the counter cash withdrawals between the dates of 8/12/2008 and 10/28/2008. The amount of the withdrawals ranged from \$20.00 to \$1,500.00.
5. The SEEC investigators, through their investigation, established that the "Winfield 2008 " campaign was in a party dominant district and that once Winfield won the party primary, no more campaign activities were necessary. Although eligible for more State of CT campaign grant funds, Winfield did not request or receive any more funds. The SEEC investigator also established through existing documentation and investigation, that Sandra McKinnie initialed and signed as the campaign's treasurer, a notarized Treasurer Certification form (SEEC FORM CEP10) on July 14, 2008. The Treasurer Certification form details specific obligations under law of the campaign treasurer. By signing and initialing the form, the treasurer certifies that he/she will abide by these specific requirements.
6. The SEEC investigation, as well as bank records of the campaign account reveal the following: the campaign account# [REDACTED] at Wachovia/ Wells Fargo was opened on 3/24/2008. The campaign account received the campaign grant deposit of \$24,977.44 of public funds on 7/25/ 2008.
7. SEEC investigators Urso and Cascudo interviewed Gary Winfield as part of their investigation. Winfield told the SEEC personnel that he didn't have any indications that there was trouble with the treasurer functions until he was alerted by the SEEC that his campaign treasurer had not made the appropriate filings. Winfield told the SEEC that he met with McKinnie and started to "pull things together to respond to SEEC concerns," but in early 2009, McKinnie became unresponsive to him and he heard that she had moved south. According to the SEEC investigation, Winfield was cooperative and assisted them in their efforts, including signing a consent for bank records.
8. On 03/22/12, the affiant and Supervisory Inspector Charles Coffey interviewed Gary Holder Winfield. Winfield was questioned relative to his knowledge of the treasury for his campaign, as

(This is page 2 of a 6 page Affidavit.)

Date	9/12/12	Signed (Affiant)	[Signature]
Jurat	Subscribed and sworn to before me on (Date) 09-12-2012	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	[Signature]
Reviewed (Prosecutorial Official)	Date	Reviewed (Judge/Judge Trial Referee)	Date
Jambalyn [Signature]	9/18/12	[Signature]	9/18/12

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Affidavit - Continued

well as the actions of Sandra McKinnie in relation to that treasury. Winfield said that he had difficulty finding a treasurer, knew McKinnie and therefore asked her to be the treasurer. Winfield said that as his campaign went on, McKinnie became flustered, that her filings were late and that the campaign paid fines. He said that the Elections Enforcement Commission called and said that they didn't have all of the proper documentation with the filings. The affiant asked Winfield how the campaign handled its expenditures. Winfield said that it was most often by check, but at times, such as the night of the primary, he instructed McKinnie to pull cash to pay certain campaign workers who he believed wouldn't be in a position to negotiate checks. Winfield said that any cash that was left over was to be redeposited.

9. The affiant asked Winfield to tell me how he outlined the expectations that he had of McKinnie as treasurer and how he instructed her. Winfield said that he downloaded the proper forms from the Elections Enforcement site. Winfield said that he sat down with McKinnie, reviewed the forms with her and they completed them together. Winfield said that he did the actual writing on the forms, but that he and McKinnie did it together and he made sure that McKinnie understood, especially the certification form. The affiant showed Winfield a copy of the certification form and he identified it. Winfield said McKinnie told the SEEC investigator Cascudo that she knew what she was doing. Winfield said that Sandra got a booklet (handbook) from the SEEC and she said that she was not going to read it. Winfield said that he did pay McKinnie to be his treasurer. Winfield said that there was a contract for compensation of McKinnie and that he completed a form which outlined the payment schedule to McKinnie. Winfield said that payments to Sandra as compensation for being treasurer should have been made by check.
10. Winfield said that his instructions to McKinnie, were for McKinnie to use checks for expenditures, but that the ATM card was used for food and there was one instance where he authorized the withdrawal of cash to pay campaign workers. Winfield said that he did not instruct McKinnie to use any specific system of accounting, but told McKinnie that it had to be accurate. The affiant told Winfield that during an interview, McKinnie said that she kept track of expenditures using various pieces of paper. Winfield said that at least at one point, she had been using the checkbook register, but may have also used various pieces of paper. Winfield said that when the financial reports were done, he and McKinnie completed them together. He said that the handwriting on the reports was his, however, McKinnie signed the reports when she was comfortable. Winfield said that withdrawals from the checking account would be made if funds were needed for reimbursements, checks, or ATM withdrawals for food for a fundraiser. Winfield said that periodic reports in April, August and October were done, but the October report covered almost everything. He said that he couldn't close out the campaign because of problems with the report as well as missing documentation. He said that he couldn't find McKinnie when everything "blew up."

(This is page 3 of a 6 page Affidavit.)

Date	9/12/12	Signed (Affiant)	<i>[Signature]</i> Inspector
Jurat	Subscribed and sworn to before me on (Date) 09-12-2012	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	<i>[Signature]</i> Insp. R. Banerjee
Reviewed (Prosecutorial Official)	Date	Reviewed (Judge/Judge Trial Referee)	Date
<i>[Signature]</i> Sambalynne C. SAsA	9/18/12	<i>[Signature]</i>	9/18/12

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Affidavit - Continued

11. Winfield said that he had no idea that any monies were unaccounted for. Winfield said that he didn't know that there was a problem until he was contacted by Urso at the SEEC who told him how much money was unaccounted for. Winfield said that he initially gave the SEEC what he obtained from McKinnie, believing that it was complete. Winfield said that his reaction to hearing that there were \$4,720.00 in ATM withdrawals from the campaign account was: "No way." Winfield said that he had gone to McKinnie's Hubinger Street apartment to attempt to locate documents after he was made aware of a problem. He said that he never had the opportunity to confront McKinnie because he only saw her in public. Winfield also said that he was unaware that McKinnie had left New Haven, or later returned.
12. Winfield told the affiant that he himself had no access to the funds of the campaign treasury, including not personally having an ATM card for the account. Winfield also said that he had some difficulty in helping the SEEC obtain the bank records of the account. He said that although the title of the account was "Winfield 2008," the bank was reluctant to allow him to sign an authorization to release records because he wasn't a person who was authorized to use the account.
13. The affiant interviewed Sandra McKinnie on two occasions, the first being on February 9, 2012. During nearly every line of questioning, McKinnie would at first appear to know nothing or little about what was being asked, but would gradually admit knowledge of the subject, but only to the extent that the affiant's knowledge was revealed. The affiant asked McKinnie some basic questions about her role in Gary Holder-Winfield's campaign, her knowledge of her duties, as well as if her official title was that of treasurer. McKinnie hesitated before answering, but did say that treasurer was her title. McKinnie said that she only did the treasurer job because Holder-Winfield was her friend, but she said that she didn't know anything about it. She said that Winfield just told her that he "knew it and that he would help her through." McKinnie said that she remembered some issue with Winfield's wife making purchases. McKinnie said that she was supposed to pay people and that Winfield said for her to "just be my treasurer." McKinnie said that a book had come to her from the Elections Enforcement Committee, but that she would be lying if she said that she read it. McKinnie said: "I wasn't diligent." She said that she remembered looking in the book for dates when expense reports were due. McKinnie said that she did reports on expenses because Winfield told her to do them. She said that she wouldn't have known to do the reports if Winfield hadn't told her to do them. McKinnie referred to herself as the "Piss Girl," and repeatedly told the affiant: "You're probably looking at me like I'm stupid."
14. The affiant showed McKinnie a copy of the official Treasurer Certification form that had been signed Sandra McKinnie, initialed with "SM" in seven places, and notarized. The date of the

(This is page 4 of a 6 page Affidavit.)

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Reviewed (Prosecutorial Official)	Date	Reviewed (Judge/Judge Trial Referee)	Date
[Signature]	9/18/12	[Signature]	9/18/12

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Affidavit - Continued

notarization and signature was 7/14/08. McKinnie examined the form and said that the initials and the signature were hers

15. McKinnie was asked to describe the method by which she handled the funds for the campaign. McKinnie, after some hesitation, said that the campaign had a bank account. She then said that she actually opened the account, but didn't remember if Winfield was also on the account. At first, McKinnie acted as if she didn't know what bank the account was in, but eventually said it was at Wachovia (now Wells Fargo). McKinnie, said that she went to the Hamden Plaza branch on Dixwell Avenue and went there with Gary (Winfield) in his truck. McKinnie started to add other small details of the visit to the branch - details that were irrelevant to the question being asked.
16. McKinnie was asked if she kept any type of ledger or register for the account. McKinnie at first acted as if she did not understand what a ledger or register was. She then said that she would write transactions down on one piece of paper until it was filled up. The affiant asked McKinnie if it was she who obtained cash from the account. McKinnie said that it was she who got the cash most of the time, but she didn't know if Winfield "never" obtained cash - "he could have." McKinnie said that she would walk two blocks to the nearest branch to obtain cash when it was needed. She said that sometimes she would write a check and that sometimes she would use the ATM to obtain cash.. McKinnie said that she believed that there were two ATM cards activated. The affiant asked McKinnie if she knew if Winfield ever wrote a check and she said that she didn't know. The affiant asked McKinnie if she was the person who received the bank statements for the account. McKinnie said that the statements had first been mailed to Winfield's home, so she didn't get them at first, but that she got them after the address had been corrected. She said that after the address had been corrected, she received them at her home at 117 Hubinger Street, New Haven, CT. She said that she kept the bank documents for three years after the election, but can't remember where they are. She said that she believes that she brought them to the basement of her parent's home, but can't find them.
17. The affiant asked McKinnie who prepared the financial reports for the campaign. At first she said that someone else did, then she said that she and Winfield prepared only the final report together. McKinnie then changed to: "we would get together, sir." McKinnie identified the signature at the bottom of the July, 2008 report. She said that she and Winfield did it together, but she didn't read it. McKinnie was asked if she had been arrested. McKinnie said that her only arrests were for her part in a radical protest at Howard University in 1983 and for Breach of peace, following a domestic dispute with her sister.

(This is page 5 of a 6 page Affidavit.)

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Reviewed (Prosecutorial Official)	Date	Reviewed (Judge/Judge Trial Referee)	Date
<i>[Signature]</i> ECC, SABA	9/18/12	<i>[Signature]</i>	9/18/12

ARREST WARRANT APPLICATION

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Affidavit - Continued

18. The affiant and Inspector Jack Bannan interviewed McKinnie for a second time on July 19, 2012. McKinnie was informed that investigation had found that there had only been one ATM card that had been activated and used for the account. McKinnie first tried to hint that there was another card by stating that bank statements were at first mistakenly sent to Gary Winfield's home. During the interview, McKinnie said that she still could not locate the financial documents for the campaign that she said she kept for a "length of time." The affiant confronted McKinnie with the missing \$4,270.00 and ATM cash withdrawals that are not documented. The affiant and Inspector Bannan explained to McKinnie, that existing documentation puts the missing \$4,270.00 in her possession. McKinnie didn't offer an explanation for the missing funds. The affiant then asked McKinnie if she used the funds for personal use or for any other reason than the campaign. McKinnie said that she hadn't. McKinnie declined to give a written statement attesting to her claim that she hadn't used the money personally.
19. The affiant checked Sandra McKinnie's criminal history and found that McKinnie has one conviction for Larceny in the fifth degree.

WHEREFORE: The affiant states that he has probable cause to believe that Sandra McKinnie, DOB 05/14/63, committed the offenses of: Larceny in the first degree in violation of section 53a-122(a (4)) of the General Statutes of Connecticut, by embezzling \$4,270.00 belonging to a public community; Improper method of payment by campaign treasurer, in violation of section 9-623/9-607(e) of the General Statutes of Connecticut, by completing forty three undisclosed and unreported cash withdrawals from the "Winfield 2008" campaign treasury account; Failure of campaign treasurer to preserve internal records for four years, in violation of section 9-623/9-607(f) of the General Statutes of Connecticut.

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Date	9/12/12	Signed (Affiant)	<i>Inspector Jack Bannan</i>
Jurat	Subscribed and sworn to before me on (Date) 09-12-2012	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	<i>Inspector Jack Bannan</i>
Reviewed (Prosecutorial Official)	Date	Reviewed (Judge/Judge Trial Referee)	Date
<i>Jambaliga JEC, SAs</i>	9/18/12	<i>[Signature]</i>	9/18/12