

CRIMINAL COMPLAINT

STATE OF WISCONSIN

DA Case No.:2013ML022256

Plaintiff,

vs.

Complaining Witness:

Aldridge, Denitra T.
2200 W. Kilbourn Ave., Apt 317
Milwaukee, WI 53233
DOB: 07/18/1986

Court Case No.:

Curtis, Latoya
6254 N. Denmark Street
Milwaukee, WI 53225
DOB: 01/23/1975

Court Case No.:

Defendants,

THE ABOVE NAMED COMPLAINING WITNESS BEING DULY SWORN, ON INFORMATION AND BELIEF STATES THAT:

Count 1: CONSPIRACY TO COMMIT THEFT BY FRAUD (VALUE EXCEEDING \$10,000) (As to defendants Denitra T. Aldridge and Latoya Curtis)

The above-named defendants between January 2011 and February 2012, at Milwaukee County, in the City of Milwaukee, Milwaukee County, Wisconsin, conspired to obtain title to property of Wisconsin Dept. of Revenue, having a value exceeding \$10,000, by intentionally deceiving that person with a false representation known by defendants to be false, made with intent to defraud and which would have defrauded that person, and further that one or more of the defendants took steps in furtherance of the conspiracy, contrary to sec. 943.20(1)(d) and (3)(c), 939.50(3)(g), 939.31 Wis. Stats.

Upon conviction for this offense, a Class G Felony, the defendants may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 2: CONSPIRACY TO COMMIT FRAUDULENT CLAIM/INCOME TAX CREDIT (As to defendant Latoya Curtis)

The above-named defendant between January 2011 and February 2012, at Milwaukee County, in the City of Milwaukee, Milwaukee County, Wisconsin, conspired to file a claim or claims for credit under s 71.07 or subch. VIII that is false and filed with fraudulent intent, and further that the defendant or others took steps in furtherance of this conspiracy contrary to sec 71.83(2)(b)4, 939.31, 939.50(3)(h), Wis. Stats.

Upon conviction for this offense, a Class H Felony, the defendants may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

Your complaining witness states that he is a special agent employed by the State of Wisconsin Department of Revenue and that he makes this complaint based upon his own investigation, based upon statements made to him by adult citizens whom he believes to be reliable and based upon statements made by the defendant Denitra Aldridge. Complaining witness states that the statements made by Denitra Aldridge were made against her penal interest and are therefore presumed to be reliable.

Your complaining witness states that during the course of carrying out his duties as a special agent with the State of Wisconsin Department of Revenue he received information from investigators with the State of Wisconsin Department of Children and Families indicating that while investigating allegations of fraud against the Wisconsin Shares Program involving a day care named Stairway to Success run by defendant Latoya Curtis, Curtis was also fabricating W-2 wage statements for tax purposes. When he investigated these allegations he discovered that during the tax years 2010 and 2011 the defendant Denitra Aldridge prepared and/or filed fraudulent income tax returns for other persons (including returns for herself for the 2010 and 2011 tax years) by including fabricated, or altered wage and withholding information (forms W-2), or created fictitious Schedules C, (sole proprietorship business incomes) in electronic returns to cause these persons to receive refunds of tax money and refundable credits they were not entitled to. A number of the individuals for whom returns were filed were recruited by defendant Curtis to engage in this scheme. The inflated refunds and refundable credits would then be split among both defendants and the individual who was named in the return.

Based on his review of Department of Revenue records and bank records from Meta Bank, Wells Fargo Bank and other financial institutions he discovered that defendant Aldridge may have filed over 30 false returns. Bank records linked defendant Curtis to nine of these returns. Aldridge normally received a flat fee of around \$300 to prepare their returns in this fashion, Defendant Curtis would receive a much larger payout from each individual.

His review of these records showed that the following false returns could be connected to both Curtis and Aldridge:

NAME	YEAR	FALSE INFORMATION	AMOUNT	FRAUD	FRAUD	FED	FED REFUND SPLIT		
				REFUND REQUEST	REFUND PAID		SUBJECT	CURTIS	ALDRIDGE
Day, K	2010	Stairway to Success Court	\$11,102.00	\$2,775.00	\$0.00	\$7,868.00	\$3,568.00	\$4,000.00	\$300.00
French, L	2010	Stairway to Success Court	\$17,861.00	\$3,189.00	\$0.00	\$10,254.00	\$4,554.00	\$5,400.00	\$300.00
Sharp, S	2010	Sch C child care business	\$16,454.00	\$1,043.00	\$1,043.00	\$4,174.00	\$3,374.00	\$700.00	\$100.00
Taylor, Y	2010	Stairway to Success Court	\$13,269.00	\$2,949.00	\$2,154.00	\$9,177.00	\$4,977.00	\$4,000.00	\$200.00
Watson, L	2010	Sch C van driver	\$13,454.00	\$1,454.00	\$1,454.00	\$6,985.00	\$4,460.00	\$1,000.00	\$1,525.00
Gordon, F	2011	Stairway to Success Court	\$12,851.00	\$844.00	\$0.00	\$5,372.00	\$2,872.00	\$2,000.00	\$500.00
Kaquatosh, M	2011	Schicas	\$15,615.00	\$2,755.00	\$2,755.00	\$9,178.00	\$4,678.00	\$4,000.00	\$500.00
Sharp, S	2011	Stairway to Success Court	\$16,457.00	\$2,877.00	\$2,877.00	\$9,322.00	\$6,322.00	\$2,700.00	\$300.00
Slylundasi, T	2011	Stairway to Success	\$16,450.00	\$2,242.00	\$399.43	\$8,014.00	\$8,014.00	\$1,200.00	
				\$20,128.00	\$10,682.43		\$42,819.00	\$25,000.00	\$3,725.00

Your complaining witness states that businesses who pay wages to employees in the State of Wisconsin are required to report those wages on a quarterly basis to the State of Wisconsin Department of Workforce Development. Based on his review of those records as well as Department of Revenue records he knows that there was no such business as Stairway to Success Court and that the returns listed above from Day, French, Gordon, Taylor and Sharp are fraudulent because each contained a W-2 that purported to list wages paid and taxes withheld from this non-existing business. He knows that the W-2 connected to the Slylundasi

return is fraudulent because DCF, DWD and Revenue records show Slylundasi was not listed as an employee of the business and that no income was reported or taxes withheld on her behalf. Complaining witness also knows that Shicas is a day care center owned by a person named Yashica Highshaw who is an associate of both defendants. Kaquatosh was not reported as an employee of that business and no wages were reported and no taxes were withheld and therefore that return is also fraudulent.

Your complaining witness states that he spoke to Latoia French about her return listed above. The return contained a W-2 from Stairway to Success Court with a Federal Employer Identification Number (FEIN) of 020611327. This FEIN does not belong to any entity that has filed any tax returns in the State of Wisconsin. French told your complaining witness that she worked for defendant Curtis until May or June, 2010. In early 2011 she asked Curtis about her W-2 and Curtis told her that she had an accountant who could file her return and get more money back for her. Curtis told her that her accountant had filed returns for other people French knew. Curtis mentioned Slylundasi, Sharp and Day. In 2012 Curtis asked her if it was ok for her accountant to do French's taxes again and French gave her permission to do so.

Complaining witness spoke to Yokenia Taylor who told him that she worked for defendant Curtis in 2010. She indicated that she worked 2-3 hours per day at the rate of \$7.25 per hour. She subsequently admitted that she did not work at all. She stated that at tax time she told Curtis that she was going to go to H&R Block but that they were too expensive. Curtis told her that she could have her accountant do them. Taylor understood that by doing it this way she would get a lot of money she was not entitled to, but that she was a single mom and unemployed.

Taylor stated that Curtis promised to call when her return was done. Curtis told her that the refund would be around \$7,000- \$8,000. Curtis gave her a check for \$5000-\$6,000 which Taylor deposited into her account. Taylor did not know defendant Aldridge and never met with her to give her information for the tax return.

Your complaining witness spoke to defendant Aldridge and she informed him that she met defendant Curtis in 2009 when she was looking for day care for her children. Sometime after she enrolled her children at the day care Curtis told her that she was working with a man named Ellis who was getting good money fast by filing false tax returns. Curtis complained that Ellis was taking too large a cut of these returns. Aldridge told Curtis that she knew how to do returns and eventually Curtis agreed to pay her \$300 per return.

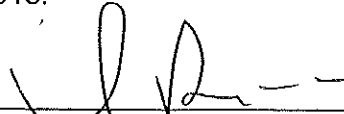
Aldridge stated that Curtis had a list of clients that she did returns for. Curtis had two FEIN numbers and would tell Aldridge which one to use on which returns. Aldridge remembered doing returns for Latoia French, Sylvia Sharp, Mary Kaquatosh, Tavaree Slylundasi and Jewel Gordon. Initially the monies would be sent to two bank accounts and then Curtis would pull money to pay the "client". They then started to use prepaid cards. Aldridge admitted that she received money from these fraudulent returns by having funds transferred into multiple bank accounts in her name, the names of her minor children and other individuals as well.

Your complaining witness states that on each of the fraudulent returns listed above the falsified documents filed with the returns caused the State of Wisconsin to issue refunds for taxes that were not paid. They also caused the State to pay monies in the form of refundable credits known as "Earned Income Credits". This happened because the inflated incomes listed caused the filers to be eligible for credits they were not actually entitled to. Based only on the returns for which your complaining witness found deposits into bank accounts held or controlled by

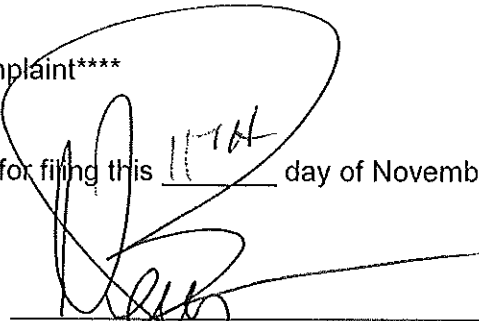
Curtis, the defendants conspired to steal more than \$20,000 from the State and received more than \$10,000. Had the State realized that all the returns were fraudulent it would not have paid these monies. Each of these returns was filed between January 2011 and February 2012. All of the returns were filed in Milwaukee County, Wisconsin.

****End of Complaint****

Subscribed and sworn to before me and approved for filing this 11th day of November, 2013.



David A. Feiss
Assistant District Attorney
1008600



Complaining Witness