

CRIMINAL COMPLAINT

STATE OF WISCONSIN

DA Case No.:2015ML002535

Plaintiff,

vs.

Complaining Witness:

Special Agent Vern Barnes

Staten, Tawanda L.
5766 N. 76th Street
Milwaukee, WI 53218
DOB: 10/20/1979

Court Case No.:

Defendant,

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

Count 1: CONSPIRACY TO COMMIT UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS, REPEATER

The above-named defendant during January 1, 2011 to December 31, 2012, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, with intent that a crime be committed, did combine with another for the purpose of committing a crime, to wit:

Unauthorized Use of an Entity's Identifying Information, whereby one of the conspirators intentionally uses the identifying information of an entity, without the authorization or consent of the entity and by representing she is acting with the authorization or consent the entity, to obtain money.

and furthermore, one or more of the conspirators did an act to effect the conspiracy's object, contrary to sections 943.203(2)(a), 939.50(3)(h), 939.31, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 2: CONSPIRACY TO COMMIT FRAUDULENT CLAIM/INCOME TAX CREDIT, REPEATER

The above-named defendant during January 1, 2011 to December 31, 2012, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, with intent that a crime be committed, did combine with another for the purpose of committing a crime, to wit:

Filing a Fraudulent Claim for Credit, whereby one of the conspirators, with intent to defraud, files a claim for a Homestead Credit that is false,

and furthermore, one or more of the conspirators did an act to effect the conspiracy's object, contrary to sections 71.83(2)(b)(4), 939.50(3)(h), 939.31, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 3: THEFT BY FRAUD (VALUE EXCEEDING \$10,000) - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant during January 1, 2011 to December 31, 2012, at 777 East Wisconsin Ave., in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did obtain title to property of another person, exceeding \$10,000 in value, by intentionally deceiving that person with a false representation, which the defendant knew to be false and which the defendant made with intent to defraud, and which did defraud the person to whom it was made, contrary to sections 943.20(1)(d) & (3)(c), 939.50(3)(g), 939.05, 971.36(3), and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 4: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about April 18, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did, with intent to defraud, file a claim for a Homestead Credit that was false, contrary to sections 71.83(2)(b)(4), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 5: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about May 4, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did, with intent to defraud, file a claim for a Homestead Credit that was false, contrary to sections 71.83(2)(b)(4), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 6: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about March 16, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did, with intent to defraud, file a claim for a Homestead Credit that was false, contrary to sections 71.83(2)(b)(4), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 7: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about May 4, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did, with intent to defraud, file a claim for a Homestead Credit that was false, contrary to sections 71.83(2)(b)(4), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 8: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about May 4, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did, with intent to defraud, file a claim for a Homestead Credit that was false, contrary to sections 71.83(2)(b)(4), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 9: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about May 12, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did, with intent to defraud, file a claim for a Homestead Credit that was false, contrary to sections 71.83(2)(b)(4), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 10: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about May 9, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did, with intent to defraud, file a claim for a Homestead Credit that was false, contrary to sections 71.83(2)(b)(4), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 11: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about April 18, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did, with intent to defraud, file a claim for a Homestead Credit that was false, contrary to sections 71.83(2)(b)(4), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 12: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about April 18, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did, with intent to defraud, file a claim for a Homestead Credit that was false, contrary to sections 71.83(2)(b)(4), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 13: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about February 22, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did intentionally use the identifying information of an entity without the authorization or consent of the entity and by representing that she was acting with the authorization or consent of the entity, to obtain money, contrary to sections 943.203(2)(a), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 14: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about February 25, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did intentionally use the identifying information of an entity without the authorization or consent of the entity and by representing that she was acting with the authorization or consent of the entity, to obtain money, contrary to sections 943.203(2)(a), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 15: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about June 30, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did intentionally use the identifying information of an entity without the authorization or consent of the entity and by representing that she was acting with the authorization or consent of the entity, to obtain money, contrary to sections 943.203(2)(a), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 16: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about June 24, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did intentionally use the identifying information of an entity without the authorization or consent of the entity and by representing that she was acting with the authorization or consent of the entity, to obtain money, contrary to sections 943.203(2)(a), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period

immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 17: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about September 12, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did intentionally use the identifying information of an entity without the authorization or consent of the entity and by representing that she was acting with the authorization or consent of the entity, to obtain money, contrary to sections 943.203(2)(a), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 18: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about June 27, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did intentionally use the identifying information of an entity without the authorization or consent of the entity and by representing that she was acting with the authorization or consent of the entity, to obtain money, contrary to sections 943.203(2)(a), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 19: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about September 2, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did intentionally use the identifying information of an entity without the authorization or consent of the entity and by representing that she was acting with the authorization or consent of the entity, to obtain money, contrary to sections 943.203(2)(a), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 20: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about July 11, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did intentionally use the identifying information of an entity without the authorization or consent of the entity and by representing that she was acting with the authorization or consent of the entity, to obtain money, contrary to sections 943.203(2)(a), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 21: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about October 10, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did intentionally use the identifying information of an entity without the authorization or consent of the entity and by representing that she was acting with the authorization or consent of the entity, to obtain money, contrary to sections 943.203(2)(a), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 22: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about August 4, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did intentionally use the identifying information of an entity without the authorization or consent of

the entity and by representing that she was acting with the authorization or consent of the entity, to obtain money, contrary to sections 943.203(2)(a), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 23: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about July 26, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did intentionally use the identifying information of an entity without the authorization or consent of the entity and by representing that she was acting with the authorization or consent of the entity, to obtain money, contrary to sections 943.203(2)(a), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 24: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about January 28, 2011, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did intentionally use the identifying information of an entity without the authorization or consent of the entity and by representing that she was acting with the authorization or consent of the entity, to obtain money, contrary to sections 943.203(2)(a), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 25: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about April 5, 2012, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did, with intent to defraud, file a claim for a Homestead Credit that was false, contrary to sections 71.83(2)(b)(4), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 26: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about April 17, 2012, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did, with intent to defraud, file a claim for a Homestead Credit that was false, contrary to sections 71.83(2)(b)(4), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 27: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about April 17, 2012, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did, with intent to defraud, file a claim for a Homestead Credit that was false, contrary to sections 71.83(2)(b)(4), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

Count 28: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER

The above-named defendant, on or about May 29, 2012, at 5766 North 76th Street, in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as party to a crime, did, with intent to defraud, file a claim for a Homestead Credit that was false, contrary to sections 71.83(2)(b)(4), 939.50(3)(h), 939.05, and 939.62(1)(b), Wis. Stats.

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

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because the defendant is a repeater, having been convicted of at least three misdemeanors during the five year period immediately preceding the commission of this offense, which remain of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than two years, if the prior convictions were misdemeanors.

1. I have been employed with the Wisconsin Department of Revenue (WDOR) for 31 years. For the last 26 years, I have served as a special agent investigating tax crimes. I have conducted numerous criminal investigations of income tax, sales tax, corporate franchise tax, withholding tax, excise tax and homestead credit claims offenses. I am also a certified public accountant.

Overview

2. My official investigation determined that, from January 1, 2011 to December 31, 2012, defendant Tawanda Staten engaged in a tax fraud conspiracy that defrauded the State of Wisconsin out of **\$234,390**. Defendant Staten, together with her sisters Sharon Staten, Angela Staten, and other co-conspirators, stole these monies by filing over two thousand fraudulent income tax returns and fraudulent homestead credit claims with WDOR. The fraudulent income tax returns submitted fictitious wage and tax statements, that misappropriated identifying information of unwitting employers, to obtain refund of purportedly withheld taxes. The fraudulent homestead credit claims submitted fictitious rent payment certificates to obtain payment. **COUNTS 1-3**

3. Defendant Staten's tax fraud conspiracy also likely defrauded the United States Department of Treasury out of several hundred thousand dollars. Federal tax records, available to WDOR, show fraudulent federal income tax returns were concurrently filed with the fraudulent State of Wisconsin returns.

4. Defendant Staten filed the fraudulent income tax returns and homestead credit claims using identities of both complicit persons and unwitting victims. In many instances, defendant Staten filed returns using the identities of inmates incarcerated in the Mississippi prison system.

5. Defendant Staten filed the fraudulent income tax returns electronically through the internet. She filed the fraudulent homestead credit claims on paper forms via the U.S. mail.

6. On May 31, 2012, law enforcement agents with the Wisconsin Division of Criminal Investigation (WDCI) executed a search warrant at defendant Staten's residence at 5766 N. 76th Street, Milwaukee, WI.

a. WDCI agents found notebooks and scrap papers listing hundreds of stolen identities with names, dates of birth, and social security numbers. The seized papers also included lists

of employers with Federal Employer Identification Numbers (FEIN). Forensic examination identified defendant Staten's latent fingerprints on one of the notebooks containing fraud notes. WDOR records show that two hundred five fraudulent income tax returns and fraudulent homestead credit claims were filed using combinations of these employee and employer identities.

b. WDCI agents found an Apple computer. Forensic analysis determined the computer contained digital files of five State of Wisconsin income tax returns. These returns matched fraudulent income tax returns filed with WDOR. Forensic analysis further showed hundreds of internet contacts with the website <http://turbotax.intuit.com>. TurboTax is an internet service that tax filers use to electronically submit their income tax returns.

c. WDCI agents found twenty-six prepaid debit cards issued in the names of persons who do not live at the home. Fraudulent income tax returns were filed requesting electronic payment to many of these prepaid debit cards. Most of the cards were issued through TurboTax.

7. Defendant Staten's endorsement signature appears on eight fraudulently obtained homestead credit claim checks and two fraudulently obtained income tax refund checks. The check payees match identities from defendant Staten's notebooks and scrap papers.

8. I questioned defendant Staten about her fraudulent income tax and homestead credit claim scheme. Defendant Staten admitted writing the address information on several of the fraudulent homestead credit claims. She also admitted cashing some of the fraudulent homestead credit claim checks.

Search Warrant

9. On May 31, 2012, Special Agents Robin Broeske, Jon Culver, Lisa Kennedy, and Kristin Fanta, WDCI, executed a search warrant on defendant Staten's single family residence at 5766 N. 76th Street, Milwaukee, WI.

10. I spoke to SA Broeske about the search. She advised as follows.

a. Defendant Staten was present when WDCI agents arrived and attempted to flee. No one else was home.

b. WDCI agents found extensive documentation confirming defendant Staten resided at 5766 N. 76th Street. That documentation included current mail, invoices, and other documents addressed to defendant Staten at the home.

11. I reviewed the evidence seized during the search warrant execution. That evidence includes the items described in paragraphs 12-17 below.

12. SA Broeske found a black cloth book bag in the living room. The bag held the following items.

a. The bag contained an envelope, postmarked May 3, 2012, mailing a TurboTax prepaid debit card to Steven Knutkowski, 5762 N. 76th Street, Milwaukee, WI. This address is immediately next door to defendant Staten's home. WDOR records show a fraudulent income tax return was electronically filed under Mr. Knutowski's identity on May 1, 2012.

b. The bag contained an envelope mailing a TurboTax prepaid debit card to Andrew Sanders, 5762 N. 76th Street, Milwaukee, WI. WDOR records show a fraudulent income tax return was electronically filed under Mr. Sanders' identity on May 8, 2012.

c. The bag contained three spiral notebooks. Each notebook was filled with handwritten notes of hundreds of personal identities. The entries typically listed name, address, social security number, TurboTax user name and password, income information (eg. "gross – 9971, job – Capitol Food"), and the dollar amount of the requested tax refund. WDOR records show fraudulent income tax returns and homestead credit claims were filed under these identities.

d. The bag contained various loose note pages with employers' and individuals' personal identifying information and income tax return related data. WDOR records show fraudulent income tax returns and homestead credit claims were filed under these identities.

13. WDCI agents found a child's pink backpack. The backpack contained various loose note pages with employers' and individuals' personal identifying information. The front of one note page listed the employers Walmart, Capitol Food, Target, and PA Staffing with their Federal Employer Identification Numbers. The reverse listed a template of numbers corresponding to the earnings and withholding blocks on a wage and tax statement (Form W-2). WDOR records show fraudulent income tax returns were filed using combinations of these same tax filer names, employer identities, and earnings and withholding numbers.

14. WDCI agents found many loose note papers, throughout the home, bearing personal identifying information and income tax return related data.

15. WDCI agents found an Enterprise Rent-A-Car invoice addressed to defendant Staten at 5766 N. 76th Street.

a. The back of this invoice had a handwritten template for creating wage and tax statements (Form W-2.)

b. The template noted employer names "PA Staffing" and "Capitol Food" with their Federal Employer Identification Numbers (FEIN). The template further listed two columns of numbers: "9971.16, 1992.12, 618.21, 144.58, and 274.67" and "8893.54, 1979.35, 373.53, 128.96, and 225.10".

c. These two columns of figures match the wages, tips and other compensation (box 1), federal income tax (box 2), Social Security tax (box 4), Medicare tax (box 6) and state tax (box 17) entries on at least one hundred twenty fraudulent wage and tax statements (Form W-2) submitted in the Staten sisters' tax fraud scheme.

16. WDCI agents found, in a computer desk area, an Apple computer, a Cricket modem, and scrap papers with various persons identifying information. A Cricket modem is a thumb-sized device that plugs into a computer USB port and allows the user to make a wireless "cloud" connection to a remote internet computer server. Forensic computer analysts Mark Howard, WDCI, found extensive evidence that the computer had connected to internet tax websites such as <http://turbotax.intuit.com> and www.revenue.wi.gov. See paragraphs 25(b) and (c) below.

17. WDCI agents found, in the same computer desk area, twenty-four prepaid debit cards issued to names other than defendant Staten. Most of the cards were embossed with the corporate name, TurboTax. The remainder were Ready prepaid debit cards, Rush prepaid debit cards, and a UP prepaid debit card. WDOR records show fraudulent income tax refunds were wired to some of these cards.

Defendant Staten statements

18. Law enforcement agents interviewed defendant Staten on three occasions regarding her tax fraud scheme.

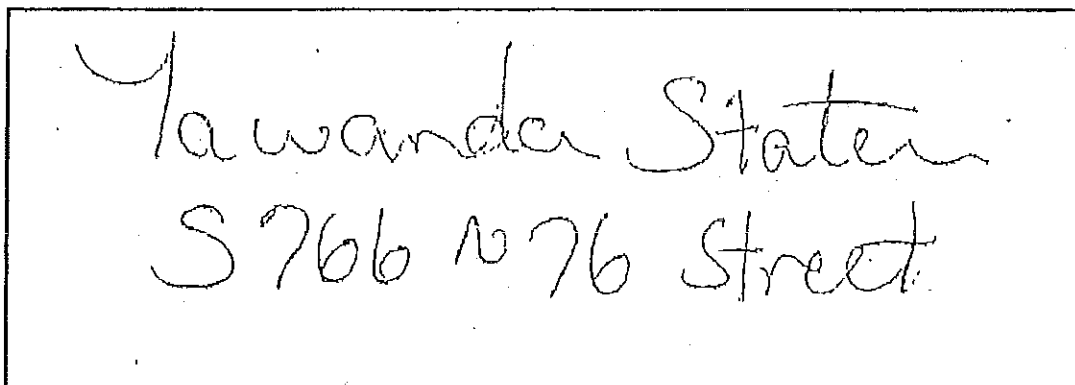
19. On May 31, 2012, defendant Staten told SA Broeske as follows. Defendant Staten claimed that all of the seized documents, bearing personal identifying information, belonged to Lakeisha Adams. Ms. Adams paid defendant Staten to store the documents in defendant Staten's home as a safe house. Ms. Adams dropped the documents off just five minutes before WDCI agents arrived to execute the search warrant. Defendant Staten denied filing any fraudulent tax returns.

20. On June 8, 2012, SA Gary Wachtl, WDOR, and I interviewed defendant Staten. Defendant Staten stated as follows. Ms. Adams files fraudulent tax returns. Ms. Adams pays defendant Staten to store the notes that Ms. Adams uses for her tax fraud scheme. Defendant Staten denied filing any fraudulent tax returns.

21. On November 15, 2012, SA Wachtl and I reinterviewed defendant Staten. Defendant Staten stated as follows.

a. I showed, to defendant Staten, fraudulently obtained homestead credit claim checks payable to Ronnie Vaughn and to Tam Tran. Forged payee signatures, followed by defendant Staten's endorsement signature, appear on the reverse of the checks. Defendant Staten admitted signing and cashing the checks. She claimed that Ms. Adams directed her to cash them and that the two split the proceeds.

b. Defendant Staten provided the below handwriting exemplar of her signature and home address.



Tawanda Staten
S 766 N 76 Street

I pointed out the distinctive manner that defendant Staten wrote, in superscript, the cardinal direction in her street address (ie. "5766^N: 76th St"). I then presented the fraudulent homestead credit claims (excerpts shown below) filed in the names of Ronnie Vaughn and Tam Tran.

H-EZ Wisconsin homestead credit *JS* Check here if an amended return L

Claimant's social security number redacted		Spouse's social security number	
Claimant's legal last name Vaughn	Legal first name Ronnie	M.I. D	
Spouse's legal last name	Spouse's legal first name	M.I.	
Home address (number and street) 5766 N 76th Street			Apt. no.
City or post office Milwaukee	State WI	Zip code 53218	

H-EZ Wisconsin homestead credit *CS* Check here if an amended return L

Claimant's social security number redacted		Spouse's social security number	
Claimant's legal last name Tran	Legal first name Tam	M.I. M	
Spouse's legal last name	Spouse's legal first name	M.I.	
Home address (number and street) 5766 N 76th Street			Apt. no.
City or post office Milwaukee	State WI	Zip code 53218	

I pointed out that the street address, handwritten on these documents, was in defendant Staten's distinctive style. Defendant Staten admitted filling out the address information on these fraudulent homestead credit claims and their accompanying rent certificates. She claimed that Ms. Adams wrote the income and rent payment numbers.

c. I presented a series of scrap papers, seized from defendant Staten's homes, listing personal identifying information. I pointed out that the street addresses were handwritten in defendant Staten's distinctive style. Defendant Staten admitted writing these notes. She claimed Ms. Adams directed her to write them.

d. Defendant Staten acknowledged she used the Apple computer that WDOR agents seized from her home. I informed Ms. Staten that five fraudulent income tax returns were found on the computer. See paragraph 25(a) below. Defendant Staten denied any knowledge of these tax returns.

22. Defendant Staten's blaming Ms. Adams is not credible. First, stolen identity notes were dispersed throughout defendant Staten's house. This dispersal is inconsistent with Ms. Adams recently dropping the documents off and with defendant Staten serving as a passive repository. Second, most of the notebook entries and scrap paper notes, of personal identity information, are written in defendant Staten's distinctive penmanship. It is not credible that Ms. Adams would have dictated so many notes to defendant Staten. Third, the tax fraud proceeds, in the form of checks and TurboTax prepaid debit cards, went to defendant Staten rather than to Ms. Adams. Fourth, multiple fraudulent income tax returns were found on defendant Staten's own computer.

Fingerprint evidence

23. SA Broeske submitted a small green spiral notebook, that she found in defendant Staten's black cloth book bag, to the Wisconsin State Crime Laboratory.

24. Forensic Analyst Adrianna Bast, Wisconsin State Crime Laboratory, is experienced and trained in the examination of fingerprint evidence. Ms. Bast forensically examined the notebook. Ms. Bast identified defendant Staten's latent fingerprints on multiple pages of the notebook. Ms. Bast also identified fingerprints of defendant Staten's sister, Sharon Staten, on the notebook.

Apple computer analysis

25. SA Mark Howard, WDOJ, is experienced and trained in forensic analysis of computers. He examined the Apple computer seized from defendant Staten's home and submitted his findings in a report dated October 30, 2102. SA Howard reported as follows.

a. SA Howard found five 2010 income tax returns saved as image files (.pdf files) in the names Linda Steigerwald, Emily Bauman, Wayzo Moore, Richard Mayberry, and Neil Zimmerman. WDOR records show these same income tax returns were electronically filed with WDOR. They were all fraudulent.

b. SA Howard found traces of hundreds of internet connections with <http://turbotaxonline.intuit.com> and <http://turbotax.intuit.com>. These websites are portals for electronically filing income tax returns.

c. SA Howard found a series of internet webpage captures from <http://turbotax.intuit.com> accessed on March 25, 2012. He also found a *Facebook.com* webpage capture, for the account of "Tawanda Staten," accessed that same day.

d. SA Howard found approximately ten internet webpage captures, from the time frame January-May 2012, of a *Yahoo.mail* account whose greeting was "Hi, Tawanda."

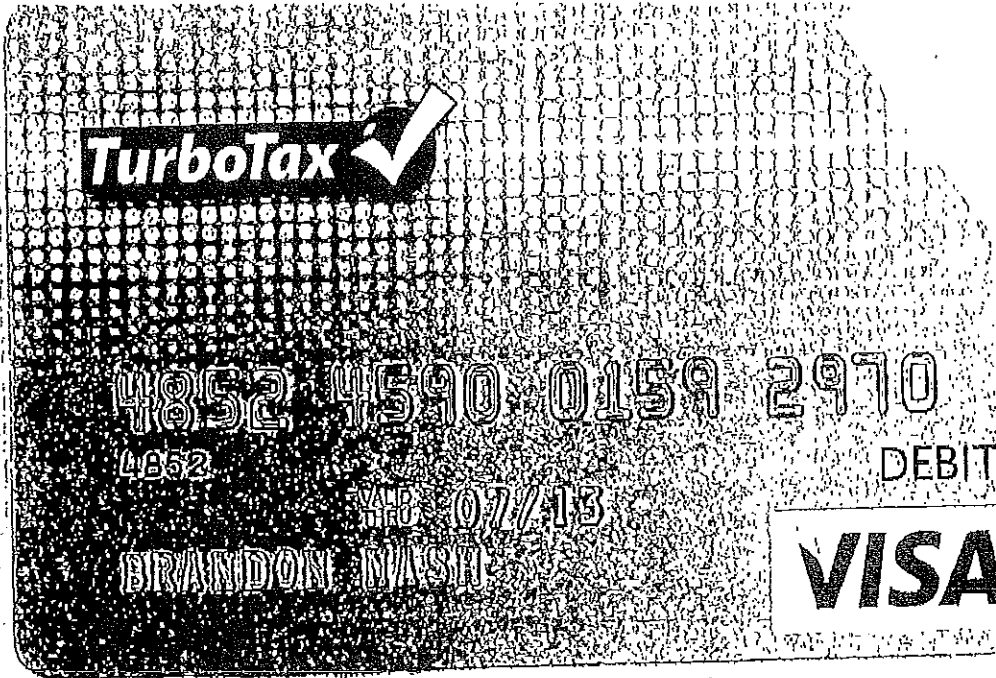
Fraudulent returns matching prepaid debit cards

26. WDCI agents seized twenty-six prepaid debit cards, bearing other persons' names, in defendant Staten's home. Most of the cards are imprinted with the corporate name, TurboTax. TurboTax issues prepaid debit cards to tax filers and routes tax refund monies to those debit card accounts.

27. I reviewed bank records, obtained by subpoena from Green Dot Bank, The Bancorps Bank, and Metabank, for the seized prepaid debit cards. The records show many of the prepaid debit cards received fraudulent income tax refunds from WDOR.

28. The following is an example of WDOR wiring a fraudulent income tax refund to one of the Green Dot Bank prepaid debit cards found in defendant Staten's home.

a. WDCI agents found the following prepaid debit card no. 4852-4590-0159-2970 in the name "Brandon Nash" in defendant Staten's home.



b. Green Dot Bank records show as follows. Account number 209992634565 was opened in the name of Brandon Nash on July 7, 2011. Prepaid debit card 4852-4590-0159-2970 was issued on this account. WDOR wired payment to the account of \$225 on July 15, 2011.

c. WDOR records show a fraudulent 2010 income tax return was electronically filed in the name of Brandon Nash on July 11, 2011. The return claimed refund of purportedly withheld state income taxes of \$225. A fraudulent wage and tax statement (Form W-2) was submitted in support of the claim purporting that Capitol Foods paid wages of \$8,894 to Mr. Nash and withheld states taxes of \$225 in 2010. WDOR approved the refund and wired this amount to the above Green Dot Bank account number 209992634565.

d. I spoke by telephone with Kozat Martin, Human Resources Manager, Capitol Foods. She reports that Capitol Foods did not employ Mr. Nash in 2010.

Fraudulent returns using identities found in defendant Staten's home

29. Law enforcement agents seized, from defendant Staten's home on May 31, 2012, notebooks and papers containing extensive personal identifying information. The majority of these notes are in defendant Staten's distinctive handwriting. I compiled this information into a master list. WDOR records show fraudulent income tax returns or homestead credit claims

were filed under two hundred five of these identities from January 1, 2011 through December 31, 2012.

Fraudulent returns and claims with defendant Staten's address

30. I researched WDOR records to identify income tax returns and homestead credit claims that were filed using 5766 N. 76th Street, Milwaukee, WI as the purported address of the tax filer. This address is defendant Staten's residence. Six fraudulent income tax returns and homestead credit claims, in other peoples' names, were filed under this address from January 1, 2011 through December 31, 2012.

Fraudulent returns and claims using 4968 N. 26th Street

31. Milwaukee County Register of Deeds filings show defendant Staten owned the property at 4968 N. 26th Street, Milwaukee, WI. By deed recorded April 9, 2012, defendant Staten, dba T & S Investment Properties, LLC received title to the property. By deed recorded June 11, 2012, defendant Staten transferred title to another owner.

32. I researched WDOR records to identify homestead credit claims filed using 4968 N. 26th Street as the purported address of the tax filer. Five fraudulent homestead credit claims, in names other than defendant Staten's, were filed under this address in April and May 2012.

33. Two of the above five fraudulent homestead credit claims used identities from the notes found in defendant Staten's home. Those claims were in the names Tracy Hayes and Crystal Harrell.

Checks endorsed by defendant Staten

34. Defendant Staten signed and cashed eleven fraudulently obtained homestead credit claim and income tax refund checks.

35. Homestead credit claim checks payable to Ronnie Vaughn (\$1,036), Tam M. Tran (\$852), and John Hodges, Jr. (\$1,076.00) were mailed to defendant Staten's home address at 5766 N. 76th Street during 2011. WDOR records show these claims were fraudulent. Defendant Staten's endorsement signature appears on the reverse of each check.

36. Homestead credit claim checks payable to Kendrick DuBose, Christopher Pounes (\$1,076.00), Jason Hines (\$900), Joshua Smith ((\$964), Derrick Stapleton (\$852), and Brian Webster (\$964) were mailed to various other addresses in Milwaukee, WI during 2011. WDOR records show these claims were fraudulent. Defendant Staten's endorsement signature appears on the reverse of each check.

37. Wisconsin income tax refund checks payable to Brian Webster (\$279) and Christopher George (\$284) were mailed to addresses in Milwaukee, WI during 2011. WDOR records show the refund claims were fraudulent. Defendant Staten's endorsement signature appears on the reverse of both checks.

38. The names and social security numbers of the above payees were all among the scrap notes and notebooks seized from defendant Staten's home

39. In her interview on November 15, 2012, defendant Staten admitted she signed and cashed the homestead credit claim checks payable to Ronnie Vaughn and Tam Tran. See paragraph 21(a) above.

Specific instances of fraud

Fraudulent claims where defendant Staten signed the payment checks

40. Defendant Staten participated in the filing of a fraudulent 2010 homestead credit claim in the name of **Derrick Stapleton** and endorsed the fraudulently obtained payment check.

COUNT 4

41. WDOR maintains a copy of the handwritten 2010 homestead credit claim form and supporting rent payment certificate filed in the name of Mr. Stapleton on April 18, 2011. The claim requested payment of \$852 and included the following false information.

a. Mr. Stapleton's income in 2010 was \$12,648.

b. Mr. Stapleton paid rent of \$500/month from January 1, 2010 to December 31, 2010 to live at 2461 N. 44th Street, Milwaukee, WI. The purported landlord was Radley Rowe.

c. Mr. Stapleton's current address was 4618 W. Rice Street, Milwaukee, WI.

42. The above rent payment certificate is fraudulent. I contacted the purported landlord, Mr. Rowe. He told me that he never had any tenant by the name of Derrick Stapleton.

43. The income figure, on the above homestead credit claim, is fraudulent. WDOR records show a 2010 income tax return was concurrently filed in Mr. Stapleton's name. That return includes a fraudulent wages and tax statement (Form W-2) purporting Mr. Stapleton earned \$12,648 from Temps Plus Temporary Service in 2010. I spoke with Alice Grant, Payroll Manager, Temps Plus Temporary Service. Ms. Grant stated Temps Plus Temporary Services did not employ Mr. Stapleton in 2010.

44. Certified records from the Mississippi Department of Corrections show this same Derrick Stapleton has been serving a fifteen year prison sentence since on July 21, 1999.

45. The street addresses on Mr. Stapleton's homestead credit claim form and rent payment certificate are handwritten in defendant Staten's distinctive manner. The cardinal directions are written in superscript.

46. WDOR mailed the below check dated May 5, 2011 for \$852 payable to Mr. Stapleton in payment of the fraudulent homestead credit claim. The reverse of the check bears defendant Staten's endorsement signature showing she negotiated it.

R 3952095 Department of Revenue PO Box 8903 Madison, WI 53708-8903		State of Wisconsin HOMESTEAD CREDIT REFUND Fund 100 Agency 688 Exp 000 Vendor 32351		R 3952095 U.S. BANK, Madison, WI 12/27/85 06/05/2011 \$1,862.00	
Pay to the order of:		DERRICK STAPLETON 4618 W RICE ST MILWAUKEE WI 53216-1430			
Pay Exactly: EIGHT HUNDRED FIFTY TWO AND 00/100 DOLLARS					
002647 DERRICK STAPLETON 4618 W RICE ST MILWAUKEE WI 53216-1430		32814375 MICHAEL KUBEL Secretary of Administration KEVIN W. SCHULZ State Treasurer			
⑈3952095⑈ ⑆075000022⑆ 111854445⑈					
JPTwiranChaseBank, 050907 620306 005420048047					
ENDORSE HERE Tawanda Staten DO NOT WRITE STAMP OR SIGN BELOW THIS LINE RESERVE FOR FRAUDULENT INSTITUTION USE					

47. Mr. Stapleton's personal identifying information appears on notes seized from defendant Staten's home. His address is handwritten in defendant Staten's distinctive style. The entry for Mr. Stapleton further lists "Homestead" and "accepted."

48. Defendant Staten participated in the filing of a fraudulent 2010 homestead credit claim in the name of **Ronnie Vaughn** and endorsed the fraudulently obtained payment check. **COUNT 5**

49. WDOR maintains a copy of the handwritten 2010 homestead credit claim form and supporting rent payment certificate filed in the name of Mr. Vaughn on May 4, 2011. The claim requested payment of \$1,036 and included the following false information.

a. Mr. Vaughn's income in 2010 was \$9,971.

b. Mr. Vaughn paid rent of \$500/month from January 1, 2010 to December 31, 2010 to live at 2802 N. 37th Street, Milwaukee, WI. The purported landlord was Joenette Kelly-Kidd.

c. Mr. Vaughn's current address was 5766 N. 76th Street, Milwaukee, WI.

50. The above rent payment certificate is fraudulent. I contacted the purported landlord, Joenette Kelly-Kidd. She told me that she never had any tenant by the name of Ronnie Vaughn.

51. The income figure, on the above homestead credit claim, is fraudulent. WDOR records show a 2010 income tax return was concurrently filed in Mr. Vaughn's name. That return includes a fraudulent wages and tax statement (Form W-2) purporting Mr. Vaughn earned \$9,971 from Target, Inc. in 2010.

I spoke with Mandy Crabbs, Asset Protection Manager, Target Corporation. Ms. Crabbs stated Target did not employ Mr. Vaughn in 2010.

52. The street addresses on Mr. Vaughn's homestead credit claim form and rent payment certificate are handwritten in defendant Staten's distinctive manner. The cardinal directions are written in superscript.

53. WDOR mailed the below check dated June 2, 2011 for \$1,036 payable to Mr. Vaughn in payment of the fraudulent homestead credit claim. The check was mailed to defendant Staten's home. The reverse of the check bears defendant Staten's endorsement signature showing she negotiated it. In her interview on November 15, 2012, defendant Staten admitted she cashed the check.

R 4084441 Department of Revenue PO Box 8903 Madison, WI 53708-8903	State of Wisconsin HOMESTEAD CREDIT REFUND Fund 100, Series 565 Sec 000 Voucher 32387	R 4084441 U.S. Bank (020400388) N.A. Milwaukee, WI 53223 06/02/2011 \$1,036.00
Pay-to-the-order-of: RONNIE D VAUGHN 5766 N 76TH ST MILWAUKEE WI 53218-2252	<i>Wanda</i>	<i>Wanda</i>
Pay Exactly: ONE THOUSAND THIRTY SIX AND 00/100 DOLLARS	002790 RONNIE D VAUGHN 5766 N 76TH ST MILWAUKEE WI 53218-2252	<i>Michael H. Hubel</i> Secretary of Administration <i>Kurt W. Schickel</i> State Treasurer 33062255
⑈408444⑈ ⑈07500002⑈ ⑈125⑈		
		ENDORSE HERE <i>Tawanda L. Staten</i> <i>Ronnie D. Vaughn</i>
		DO NOT WRITE STAMP OR SIGN BELOW THIS LINE RESERVED FOR FINANCIAL INSTITUTION USE

54. Mr. Vaughn's personal identifying information appears on notes seized from defendant Staten's home. The entry for Mr. Vaughn further lists "mail check" and "Homestead."

55. Defendant Staten participated in the filing of a fraudulent 2010 homestead credit claim in the name of Tam Tran and endorsed the fraudulently obtained payment check. **COUNT 6**

56. WDOR maintains a copy of the handwritten 2010 homestead credit claim form and supporting rent payment certificate filed in the name of Mr. Tran on March 16, 2011. The claim requested payment of \$852 and included the following false information.

a. Mr. Tran's income in 2010 was \$12,647.

b. Mr. Tran paid rent of \$500/month from January 1, 2010 to December 31, 2010 to live at 3024 N. 41st Street, Milwaukee, WI. The purported landlord was Lawanda Shaw.

c. Mr. Tran's current address was 5766 N. 76th Street, Milwaukee, WI.

57. The above rent payment certificate is fraudulent. I contacted the purported landlord, Ms. Shaw. She told me that she never had any tenant by the name of Tam Tran.

58. The income figure, on the above homestead credit claim, is fraudulent. WDOR records show a 2010 income tax return was concurrently filed in Mr. Tran's name. That return includes a fraudulent wages and tax statement (Form W-2) purporting Mr. Tran earned \$12,648 from Target, Inc. in 2010. I spoke with Mandy Crabbs, Asset Protection Manager, Target Corporation. Ms. Crabbs stated Target did not employ Mr. Tran in 2010.

59. The street addresses on Mr. Tran's homestead credit claim form and rent payment certificate are handwritten in defendant Staten's distinctive manner. The cardinal directions are written in superscript.

60. WDOR mailed the below check dated March 22, 2011 for \$852 payable to Mr. Tran in payment of the fraudulent homestead credit claim. The check was mailed to defendant Staten's home. The reverse of the check bears defendant Staten's endorsement signature showing she negotiated it. In her interview on November 15, 2012, defendant Staten admitted she cashed the check.

R 3548676 Department of Revenue PO Box 8903 Madison, WI 53708-8903	State of Wisconsin HOMESTEAD CREDIT REFUND <small>Fund 100 Agency 588 Ser 000 Voucher 32287</small>	R 3548676 U.S. Treasury Department Milwaukee, WI 53202 03/22/2011 \$**852.00
Pay to the order of: TAM M TRAN 5766 N 76TH ST MILWAUKEE WI 53218-2252		
Pay Exactly: EIGHT HUNDRED FIFTY TWO AND 00/100 DOLLARS		
005552 TAM M TRAN 5766 N 76TH ST MILWAUKEE WI 53218-2252	32236120 Michael Schulz Secretary of Administration Kurt W. Schulte State Treasurer	
# 3548676# 12075000022# 111851115#		
ENDORSE HERE x Tam Tran Tawanda Staten <small>DO NOT WRITE STAMP OR SIGN BELOW THIS LINE PRESERVE FOR FINANCIAL INSTITUTION USE</small>		

61. Mr. Tran's personal identifying information appears on notes seized from defendant Staten's home. The entry in Mr. Tran's name further lists "Homestead" and "accepted."

62. Defendant Staten participated in the filing of a fraudulent 2010 homestead credit claim in the name of **Christopher Pounes** and endorsed the fraudulently obtained payment check.

COUNT 7

63. WDOR maintains a copy of the handwritten 2010 homestead credit claim form and supporting rent payment certificate filed in the name of Mr. Pounes on May 4, 2011. The claim requested payment of \$1,076 and included the following false information.

a. Mr. Pounes' income in 2010 was \$8,893.

b. Mr. Pounes paid rent of \$475/month from January 1, 2010 to December 31, 2010 to live at 3140 N. 42nd Street, Milwaukee, WI. The purported landlord was Twill McCall.

c. Mr. Pounes' current address was 5344 N. 38th Street, Milwaukee, WI.

64. The above rent payment certificate is fraudulent. I contacted the purported landlord, Mr. McCall. He told me that he never had any tenant by the name of Christopher Pounes.

65. The income figure, on the above homestead credit claim, is fraudulent. WDOR records show a 2010 income tax return was concurrently filed in Mr. Pounes' name (misspelled as Pounces). That return includes a fraudulent wages and tax statement (Form W-2) purporting Mr. Pounes earned \$8,894 from Capitol Foods in 2010. I spoke with Kozat Martin, Human Resources Manager, Capitol Foods. Ms. Martin stated Capitol Foods did not employ Mr. Pounes in 2010.

66. The street addresses on Mr. Pounes' homestead credit claim form and rent payment certificate are handwritten in defendant Staten's distinctive manner. The cardinal directions are written in superscript.

67. WDOR mailed the below check dated June 1, 2011 for \$1,076 payable to Mr. Pounes in payment of the fraudulent homestead credit claim. The check was mailed to 5344 N. 38th Street. The reverse of the check bears defendant Staten's endorsement signature showing she negotiated it.

R 4075826 Department of Revenue PO Box 8900 Madison, WI 53709-8900	State of Wisconsin HOMESTEAD CREDIT REFUND Fund 100, Agency 586, Exp 000 Voucher 32385	R 4075826 U.S. BANK, Milwaukee, WI 10-2710 06/01/2011 \$**1,076.00
Pay to the order of: CHRISTOPHER POUNES 5344 N 38 ST APT LOWER MILWAUKEE WI 53209-0000		06/01/2011 \$**1,076.00
Pay Exactly: ONE THOUSAND SEVENTY SIX AND 00/100 DOLLARS		
002901 CHRISTOPHER POUNES 5344 N 38 ST APT LOWER MILWAUKEE WI 53209-0000	MICHAEL KUHLE SECRETARY OF REVENUE 33046939 KURT W. SCHULTE STATE TREASURER	
@4075826# @075000022# 14451115#		
(Empty space for stamp or additional information)		DO NOT WRITE STAMP OR SIGN BELOW THIS LINE RESERVED FOR FINANCIAL INSTITUTION USE Tawanda Staten Christopher Pounes
(Empty space for stamp or additional information)		(Empty space for stamp or additional information)

68. The above check was mailed to 5344 N. 38th Street. Sharon Staten controlled the residence at that address. See paragraph 193(b) below. Sharon Staten is defendant Staten's sister and a co-conspirator in the tax fraud scheme.

69. Mr. Pounes' personal identifying information appears on notes seized from defendant Staten's home. The entry in Mr. Pounes name further lists "gotta do Homestead."

70. Defendant Staten participated in the filing of a fraudulent 2010 homestead credit claim in the name of **John Hodges Jr.** and endorsed the fraudulently obtained payment check.
COUNT 8

71. WDOR maintains a copy of the handwritten 2010 homestead credit claim form and supporting rent payment certificate filed in the name of Mr. Hodges on May 4, 2011. The claim requested payment of \$1,076 and included the following false information.

- a. Mr. Hodges' income in 2010 was \$8,893.
- b. Mr. Hodges paid rent of \$475/month from January 1, 2010 to December 31, 2010 to live at 2804 N. 37th Street, Milwaukee, WI. The purported landlord was Joenette Kelly-Kidd.
- c. Mr. Hodges' current address was 5766 N. 76th Street, Milwaukee, WI.

72. The above rent payment certificate is fraudulent. I contacted the purported landlord, Ms. Kelly-Kidd. She told me that she never had any tenant by the name of John Hodges, Jr.

73. The income figure, on the above homestead credit claim, is fraudulent. WDOR records show a 2010 income tax return was concurrently filed in Mr. Hodges' name. That return includes a fraudulent wage and tax statement (Form W-2) purporting Mr. Hodges earned \$8,894 from PA Staffing in 2010. I spoke with Lynn Sheldon, Payroll Accounting Assistant, PA Staffing. Ms. Sheldon stated PA Staffing did not employ Mr. Hodges in 2010.

74. The street addresses on Mr. Hodges' homestead credit claim form and rent payment certificate are handwritten in defendant Staten's distinctive manner. The cardinal directions are written in superscript.

75. WDOR mailed the below check dated June 1, 2011 for \$1,076 payable to Mr. Hodges in payment of the fraudulent homestead credit claim. The check was mailed to defendant Staten's home. The reverse of the check bears defendant Staten's endorsement signature showing she negotiated it.

State of Wisconsin
HOMESTEAD CREDIT REFUND
 Fund 100 Agency 568 Ser. 000 Voucher 32385

H 4076445
 Department of Revenue
 PO Box 6903
 Madison, WI 53708-8903

R 4076445
 U.S. BANK
 12-07-20
 06/01/2011
 \$**1,076.00

Pay to the order of: JOHN HODGES JR
 8786 N76 ST
 MILWAUKEE WI 53218-0000

Pay Exactly: ONE THOUSAND SEVENTY SIX AND 00/100 DOLLARS

003520
 JOHN HODGES JR
 8766 N76 ST
 MILWAUKEE WI 53218-0000

33047558

ENDORSE HERE
 Tawanda L. Staten

DO NOT WRITE STAMP OR SIGN BELOW THIS LINE
 RESERVED FOR BANKAL INSTITUTION USE

76. Mr. Hodges' personal identifying information appears on notes seized from defendant Staten's home. The entry in Mr. Hodges' name further lists "Homestead" and "Accepted."

77. Defendant Staten participated in the filing of a fraudulent 2010 homestead credit claim in the name of **Kendrick DuBose** and endorsed the fraudulently obtained payment check.
COUNT 9

78. WDOR maintains a copy of the handwritten 2010 homestead credit claim form and supporting rent payment certificate filed in the name of Mr. Dubose on May 12, 2011. The claim requested payment of \$1,004 and included the following false information.

a. Mr. Dubose's income in 2010 was \$9,971.

b. Mr. Dubose paid rent of \$475/month from January 1, 2010 to December 31, 2010 to live at 3142 N. 42nd Street, Milwaukee, WI. The purported landlord was Twill McCall.

c. Mr. Dubose's current address was 5344 N. 38th Street, Milwaukee, WI.

79. The above rent payment certificate is fraudulent. I contacted the purported landlord, Mr. McCall. He told me that he never had any tenant by the name of Kendrick DuBose.

80. The income figure, on the above homestead credit claim, is fraudulent. WDOR records show a 2010 income tax return was concurrently filed in Mr. Dubose's name. That return includes a fraudulent wages and tax statement (Form W-2) purporting Mr. Dubose earned \$9,9971 from Human Resource Services, Inc. in 2010. I spoke with Matthew Bare, Chief Relationship Officer, Human Service Resources, Inc. Mr. Bare stated Human Service Resources, Inc. did not employ Mr. DuBose in 2010.

81. The street addresses on Mr. Dubose's homestead credit claim form and rent payment certificate are handwritten in defendant Staten's distinctive manner. The cardinal directions are written in superscript.

82. WDOR mailed the below check dated June 3, 2011 for \$1,004 payable to Mr. Dubose in payment of the fraudulent homestead credit claim. The check was mailed to 5344 N. 38th Street. The reverse of the check bears defendant Staten's endorsement signature showing she negotiated it.

R 4089717 Department of Revenue PO Box 8903 Madison, WI 53708-8903	State of Wisconsin HOMESTEAD CREDIT REFUND Fund 100 Agency 566 300 000 Voucher 32389	R 4089717 U.S. BANK OF WISCONSIN Milwaukee, WI 53201 Yield one year after date 09/09/2011 \$**1,004.00
Pay to the order of: KENDRICK L DUBOSE 5344 N 38 ST APT LOWER MILWAUKEE WI 53209-0000		\$**1,004.00
Pay Exactly: ONE THOUSAND FOUR AND 00/100 DOLLARS		
001840 KENDRICK L DUBOSE 5344 N 38 ST APT LOWER MILWAUKEE WI 53209-0000	33070328 Michael Hubel Director of Administration Kurt W. Schuler State Treasurer	THIS CHECK CONTAINS WATERMARKS WHICH ARE AN ANTI-COUNTERFEIT MEASURE
@4089717# 0075000022# 111851115#		
(Empty space for stamp or signature)		ENCLOSURE HERE Tawanda L. Staten DO NOT WRITE STAMP OR SIGN BELOW THIS LINE RESERVED FOR FINANCIAL INSTITUTION USE

83. The above check was mailed to 5344 N. 38th Street. Sharon Staten controlled the residence at that address. See paragraph 238 below. Sharon Staten is defendant Staten's sister and a co-conspirator in the tax fraud scheme.

84. Mr. Dubose' personal identifying information appears on notes seized from defendant Staten's home. The entry in Mr. DuBose's name further lists "Homestead" and "Accepted."

85. Defendant Staten participated in the filing of a fraudulent 2010 homestead credit claim in the name of **Jason Hines** and endorsed the fraudulently obtained payment check. **COUNT 10**

86. WDOR maintains a copy of the handwritten 2010 homestead credit claim form and supporting rent payment certificate filed in the name of Mr. Hines on May 9, 2011. The claim requested payment of \$900 and included the following false information.

a. Mr. Hines' income in 2010 was \$11,869.

b. Mr. Hines paid rent of \$500/month from January 1, 2010 to December 31, 2010 to live at 4430 N. 76th Street, Milwaukee, WI. The purported landlord was Lisa Robbins.

c. Mr. Hines' current address was 4469 N. 41st Street, Milwaukee, WI.

87. The above rent payment certificate is fraudulent. I contacted the purported landlord, Ms. Robbins. She told me that she never had any tenant by the name of Jason Hines.

88. The income figure, on the above homestead credit claim, is fraudulent. WDOR records show a 2010 income tax return was concurrently filed in Mr. Hines' name. That return includes a fraudulent wage and tax statement (Form W-2) purporting Mr. Hines earned \$11,869 from K-Mart in 2010. I spoke with Mary Smigielski, Assistant General Counsel, K-Mart. Ms. Smigielski stated K-Mart did not employ Mr. Hines in 2010.

89. The street addresses on Mr. Hines' homestead credit claim form and rent payment certificate are handwritten in defendant Staten's distinctive manner. The cardinal directions are written in superscript.

90. WDOR mailed the below check dated June 2, 2011 for \$900 payable to Mr. Hines in payment of the fraudulent homestead credit claim. The check was mailed to 4469 N. 41st Street, Milwaukee, WI. The reverse of the check bears defendant Staten's endorsement signature showing she negotiated it.

R 4083983 Department of Revenue PO Box 8903 Madison, WI 53708-8903		State of Wisconsin HOMESTEAD CREDIT REFUND Form 100 (9/10) 566 Sto 000 Voucher 32987		R 4083993 U.S. BANK (10/10/11) 12-27-10 06/02/2011 \$**900.00	
Pay to the order of: JASON HINES 4469 N 41ST ST MILWAUKEE WI 53209-5815					
Pay Exactly: NINE HUNDRED AND 00/100 DOLLARS		002342 JASON HINES 4469 N 41ST ST MILWAUKEE WI 53209-5815		33061807 Secretary of Administration State Treasurer	
4083993 120750000221 11185111511					
<div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p>DO NOT WRITE, STAMP, OR SIGN BELOW THIS LINE RESERVED FOR BANK/CLEARING HOUSE USE</p> </div> <div style="width: 35%;"> <p>ENDORSE HERE</p> <p><i>Tawanda L. Staten</i></p> <p><i>Jason Hines</i></p> </div> </div>					

91. Mr. Hines personal identifying information appears on notes seized from defendant Staten's home. The entry in Mr. Hines' name further list "Homestead" and "Accepted."

92. Defendant Staten participated in the filing of a fraudulent 2010 homestead credit claim in the name of **Joshua Smith** and endorsed the fraudulently obtained payment check. **COUNT 11**

93. WDOR maintains a copy of the handwritten 2010 homestead credit claim form and rent payment certificate filed in the name of Mr. Smith on April 18, 2011. The claim requested payment of \$964 and included the following false information.

a. Mr. Smith's income in 2010 was \$10,983.

b. Mr. Smith paid rent of \$500/month from January 1, 2010 to December 31, 2010 to live at 1953 N. 32nd Street, Milwaukee, WI. The purported landlord was Fawzi Abdu-Hamdan.

c. Mr. Smith's current address was 3520 N. 9th Street, Apartment A, Milwaukee, WI.

94. The above rent payment certificate is fraudulent. I contacted the owner of 1953 N. 32nd Street, Julie Abdu-Hamdan. Ms. Abdu Hamdan told me that she never had any tenant by the name of Joshua Smith.

95. The income figure, on the above homestead credit claim, is fraudulent. WDOR records show a 2010 income tax return was concurrently filed in Mr. Smith's name. That return includes a wages and tax statement (Form W-2) purporting Mr. Smith earned \$10,984 from K-Mart Corporation in 2010. I spoke with Mary Smigielski, Assistant General Counsel, K-Mart. Ms. Smigielski stated K-Mart did not employ Mr. Smith in 2010.

96. The street addresses on Mr. Smith's homestead credit claim form and rent payment certificate are handwritten in defendant Staten's distinctive manner. The cardinal directions are written in superscript.

97. WDOR mailed the below check dated May 26, 2011 for \$964 payable to Mr. Smith in payment of the fraudulent homestead credit claim. The check was mailed to 3520 N. 9th Street, Apartment A, Milwaukee, WI. The reverse of the check bears defendant Staten's endorsement signature showing she negotiated it.

H 4060492 Department of Revenue PO Box 8903 Madison, WI 53708-8903		State of Wisconsin HOMESTEAD CREDIT REPUND Fund 100 Agency 566 Sec 000 Voucher 32381		R 4060492 U.S. BANK, MILWAUKEE, WI 05/26/2011 \$964.00	
Pay to the order of: JOSHUA SMITH 3520 N 9TH ST APT A MILWAUKEE WI 53206-3308		Pay Exactly: NINE HUNDRED SIXTY FOUR AND 00/100 DOLLARS			
001694 JOSHUA SMITH 3520 N 9TH ST APT A MILWAUKEE WI 53206-3308		33021200 State Treasurer			
4060492 075000022* 111851115*					
DO NOT WRITE STAMP OR SIGN BELOW THIS LINE RESERVED FOR FINANCIAL INSTITUTION USE					
ENDORSE HERE Joshua Smith Tawanda Staten					

98. Mr. Smith's personal identifying information appears on notes seized from defendant Staten's home. The entry in Mr. Smith's name further lists "Homestead."

99. Defendant Staten participated in the filing of a fraudulent 2010 homestead credit claim in the name of **Brian Webster** and endorsed the fraudulently obtained payment check. **COUNT 12**

100. WDOR maintains a copy of the handwritten 2010 homestead credit claim form and supporting rent payment certificate filed in the name of Mr. Webster on April 18, 2011. The claim requested payment of \$964 and included the following false information.

a. Mr. Webster's income in 2010 was \$10,983.

b. Mr. Webster paid rent of \$550/month from January 1, 2010 to December 31, 2010 to live at 1937A N. 32nd Street, Milwaukee, WI. The purported landlord was Anita Johnson.

c. Mr. Webster's current address was 3520A N. 9th Street, Milwaukee, WI.

101. The above rent payment certificate is fraudulent. I contacted the purported landlord, Anita Johnson. She told me that she never had any tenant by the name of Brian Webster.

102. The income figure, on the above homestead credit claim, is fraudulent. WDOR records show a 2010 income tax return was concurrently filed in Mr. Webster's name. That return includes a fraudulent wages and tax statement (Form W-2) purporting Mr. Webster earned \$10,984 from K-Mart in 2010. I spoke with Mary Smigielski, Assistant General Counsel, K-Mart. Ms. Smigielski stated K-Mart did not employ Mr. Webster in 2010.

103. The street addresses on Mr. Webster's homestead credit claim form and rent payment certificate are handwritten in defendant Staten's distinctive manner. The cardinal directions are written in superscript.

104. WDOR mailed the below check dated May 26, 2011 for \$964 payable to Mr. Webster in payment of the fraudulent homestead credit claim. The check was mailed to 3520A N. 9th Street, Milwaukee, WI. The reverse of the check bears defendant Staten's endorsement signature showing she negotiated it.

R 4060491 Department of Revenue PO Box 0903 Madison, WI 53708-0903	State of Wisconsin HOMESTEAD CREDIT REFUND Fund 100 Agency 568 Reb. 000 Voucher 32381	R 4060491 U.S. BANK Milwaukee, WI 53202 05/26/2011 \$**964.00
Pay to the order of: BRIAN WEBSTER 3520A N 9TH ST MILWAUKEE WI 53206-3305		05/26/2011 \$**964.00
Pay Exactly: NINE HUNDRED SIXTY FOUR AND 00/100 DOLLARS		
001693 BRIAN WEBSTER 3520A N 9TH ST MILWAUKEE WI 53206-3305	33021199 <i>Michael Kubul</i> Secretary of Administration <i>Kenneth W. Schiller</i> State Treasurer	
@4060491# 10750000223 1118511151		
		DO NOT WRITE STAMP OR SIGN BELOW THIS LINE RESERVED FOR FINANCIAL INSTITUTION USE Tawanda Staten Tawanda Staten
		Tawanda Staten Tawanda Staten


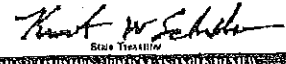


105. Mr. Webster's personal identifying information appears on notes seized from defendant Staten's home. The entry for Mr. Webster further lists "occup-Kmart," "gross - 10983.69," "Homestead," and "mailed check."

106. Defendant Staten participated in the filing of a fraudulent 2010 income tax return in the name of Brian Webster and endorsed the fraudulently obtained payment check.

107. WDOR records show an income tax return was electronically filed in the name of Mr. Webster on February 22, 2011. The return requested a refund of withheld taxes in the amount of \$279. The return included an electronically filed wages and tax statement (Form W-2) purporting that Mr. Webster earned \$10,984 dollars from K-Mart during 2010. The Form W-2 further purported the employer withheld \$323 of state income taxes. This wage and tax information was false.

108. I spoke with Mary Smigielski, Assistant General Counsel, K-Mart. Ms. Smigielski stated as follows. K-Mart did not employ Mr. Webster in 2010. K-Mart gave no one permission to use their company's identity to fabricate a wage and tax statement (Form W-2) in Mr. Webster's name. **COUNT 13**

109. WDOR mailed the below check dated March 4, 2011 for \$279 payable to Mr. Webster in payment of the fraudulent income tax refund. The check was mailed to 4618 W. Rice Street, Milwaukee, WI. The reverse of the check bears defendant Staten's endorsement signature showing she negotiated it.

R 3377413 Department of Revenue PO Box 8903 Madison, WI 53708-0803	State of Wisconsin INDIVIDUAL INCOME TAX REFUND Form 100 Agency 556 Sps 000 Voucher 32283	R 3377413 12-2010 U.S. BANK, Milwaukee, WI Madison, WI 53703 Valid one year after date 03/04/2011
Pay to the order of: BRIAN WEBSTER 4618 W RICE ST MILWAUKEE WI 53218-1430		\$**279.00
Pay Exactly: TWO HUNDRED SEVENTY NINE AND 00/100 DOLLARS		
003950 BRIAN WEBSTER 4618 W RICE ST MILWAUKEE WI 53216-1430	32009735	 
⑈ 3377413⑈ ⑆ 075000022⑆ 111851115⑈		
		ENDORSE HERE  

110. Defendant Staten participated in the filing of a fraudulent 2010 income tax return in the name of **Christopher George** and endorsed the fraudulently obtained payment check.

111. WDOR records show an income tax return was electronically filed in the name of Mr. George on February 25, 2011. The return requested a refund of withheld taxes in the amount of \$284. The return included an electronically filed wages and tax statement (Form W-2) purporting that Mr. George earned \$11,869 dollars from Target Corporation during 2010. The Form W-2 further purported the employer had withheld \$369 in state income taxes. This information was false.

112. I spoke with Mandy Crabbs, Asset Protection Manager, Target Corporation. Ms. Crabbs stated as follows. Target did not employ Mr. George in 2010. Target gave no one permission to use their company's identity to fabricate a wage and tax statement (Form W-2) in Mr. George's name. **COUNT 14**

113. WDOR mailed the below check dated March 4, 2011 for \$284 payable to Mr. George in payment of the fraudulent income tax refund. The check was mailed to 8525 W. Townsend Street, Milwaukee, WI. The reverse of the check bears defendant Staten's endorsement signature showing she negotiated it.

State of Wisconsin
INDIVIDUAL INCOME TAX REFUND
Field 100 Agency 668 Ser 000 Vershr 32269

R 3420553 12-2760
U.S. BANK NATIONAL ASSOCIATION
Milwaukee, WI 53202
Valid only for ATM use

Pay to the order of: CHRISTOPHER GEORGE
8525 W TOWNSEND ST
MILWAUKEE WI 53222-3761

03/09/2011
\$**284.00

Pay Exactly: TWO HUNDRED EIGHTY FOUR AND 00/100 DOLLARS

004282
CHRISTOPHER GEORGE
8525 W TOWNSEND ST
MILWAUKEE WI 53222-3761

32068454

Michaela Kubal
Secretary of Administration

Kurt W. Schulte
State Treasurer

ENCLOSURE CONTAINS WATERMARKS. HOLD AT AN ANGLE TO VIEW.

ENDORSE HERE
Christophor George
Tawanda Staten

DO NOT WRITE STAMP, OR SIGN BELOW THIS LINE
RESERVED FOR FINANCIAL INSTITUTION USE

@3420553# 00750000220 12511151#

114. Mr. George's personal identifying information appears on notes seized from defendant Staten's home. His address is handwritten in defendant Staten's distinctive style. The seized notes further indicate "occup-target" and "gross-11869.42."

Fraudulent income tax returns on defendant Staten's computer

115. Defendant Staten participated in the electronic filing, via her Apple computer, of a fraudulent 2010 income tax return in the name of Linda Steigerwald.

116. WDCI Special Agent Mark Howard found a digital image of a Wisconsin income tax return (Form 1A) for tax year 2010 in the name of Ms. Steigerwald, 8120 W. Bender, Apt No. 2, Milwaukee, WI on defendant Staten's computer.

117. WDOR records show a 2010 income tax return (Form 1A) was electronically filed in the name of Ms. Steigerwald, 8120 W. Bender, Apt No. 2, Milwaukee, WI on June 30, 2011. The

return requested a refund of withheld taxes in the amount of \$275. WDOR wired the refund to a prepaid debit card account.

118. The 2010 income tax return on defendant Staten's computer exactly matches the 2010 income tax return filed with WDOR in Ms. Steigerwald's name. They are the same document.

119. Ms. Steigerwald's 2010 income tax return, filed with WDOR, included an electronic wages and tax statement (Form W-2) purporting that Ms. Steigerwald earned \$9,971 dollars from Capitol Foods. The Form W-2 further purported the employer had withheld \$275 in state income taxes. This information was false.

120. I spoke with Kozat Martin, Human Resources Manager, Capitol Foods. Ms. Martin stated as follows. Capitol Foods did not employ Ms. Steigerwald in 2010. Capitol Foods gave no one permission to use their company's identity to fabricate a wage and tax statement (Form W-2) in Ms. Steigerwald's name. **COUNT 15**

121. Ms. Steigerwald's wage and tax statement (Form W-2) matches the template on the back defendant Staten's Enterprise Rent-A-Car invoice. See paragraphs 15(a)-(c) above.

122. I interviewed adult citizen Ellen Smith. Ms. Smith stated as follows. Ms. Smith is the sister of Linda Steigerwald. Ms. Steigerwald is mentally handicapped and unable to work. Ms. Steigerwald never worked at Capitol Foods and has never lived at 8120 W. Bender. Ms. Steigerwald never received a prepaid debit card with an income tax refund.

123. Ms. Steigerwald's personal identifying information appears on handwritten notes, in defendant Staten's distinctive style, seized from defendant Staten's home. Ms. Steigerwald's purported address of 8120 W. Bender is handwritten in defendant Staten's distinctive style. The seized notes further list Ms. Steigerwald's social security number, date of birth, purported wages ("gross-9971 job-Capitol Food"), and tax refund information ("Fed-2598-received State-275-recieved" *sic*).

124. Defendant Staten participated in the electronic filing, via her Apple computer, of a fraudulent 2010 income tax return in the name of **Wayzo Moore**.

125. WDCI Special Agent Mark Howard found a digital image of a Wisconsin income tax return (Form 1A) for tax year 2010 in the name of Mr. Moore, 3245 S. Indiana Avenue, Milwaukee, WI on defendant Staten's computer.

126. WDOR records show a 2010 income tax return (Form 1A) was electronically filed in the name of Mr. Moore, 3245 S. Indiana Avenue, Milwaukee, WI on June 24, 2011. The return claimed a refund of withheld taxes in the amount of \$225. WDOR wired the refund to a prepaid debit card account.

127. The 2010 income tax return on defendant Staten's computer exactly matches the 2010 income tax return filed with WDOR in Mr. Moore's name. They are the same document.

128. Mr. Moore's 2010 income tax return, filed with WDOR, included an electronic wages and tax statement (Form W-2) purporting that Mr. Moore earned \$8,894 dollars from Capitol Foods. The Form W-2 further purported the employer had withheld \$225 in state income taxes. This information was false.

129. I spoke with Kozat Martin, Human Resources Manager, Capitol Foods. Ms. Martin stated as follows. Capitol Foods did not employ Mr. Moore in 2010. Capitol Foods gave no one

permission to use their company's identity to fabricate a wage and tax statement (Form W-2) in Mr. Moore's name. **COUNT 16**

130. Mr. Moore's wage and tax statement (Form W-2) matches the template on the back defendant Staten's Enterprise Rent-A-Car invoice. See paragraphs 15(a)-(c) above.

131. Mr. Moore's personal identifying information appears on handwritten notes, in defendant Staten's distinctive style, seized from defendant Staten's home. The seized notes further list "gross-8893." This entry matches the gross wages submitted on Mr. Moore's fraudulent 2010 income tax return.

132. Defendant Staten participated in the electronic filing, via her Apple computer, of a fraudulent 2010 income tax return in the name of **Richard Mayberry**.

133. WDCI Special Agent Mark Howard found a digital image of a Wisconsin income tax return (Form 1A) for tax year 2010 in the name of Mr. Mayberry, 5677 N. 60th Street, Milwaukee, WI on defendant Staten's computer.

134. WDOR records show a 2010 income tax return (Form 1A) was electronically filed in the name of Mr. Mayberry, 5677 N. 60th Street, Milwaukee, WI on September 12, 2011. The return claimed a refund of withheld taxes in the amount of \$225. WDOR denied the claim.

135. The 2010 income tax return on defendant Staten's computer exactly matches the 2010 income tax return filed with WDOR in Mr. Mayberry's name. They are the same document.

136. Mr. Mayberry's 2010 income tax return, filed with WDOR, included an electronic wages and tax statement (Form W-2) purporting that Mr. Mayberry earned \$8,894 dollars from Capitol Foods. The Form W-2 further purported the employer had withheld \$225 in state income taxes. This information was false.

137. I spoke with Kozat Martin, Human Resources Manager, Capitol Foods. Ms. Martin stated as follows. Capitol Foods did not employ Mr. Mayberry in 2010. Capitol Foods gave no one permission to use their company's identity to fabricate a wage and tax statement (Form W-2) in Mr. Mayberry's name. **COUNT 17**

138. Mr. Mayberry's wage and tax statement (Form W-2) matches the template on the back defendant Staten's Enterprise Rent-A-Car invoice. See paragraphs 15(a)-(c) above.

139. Mr. Mayberry's personal identifying information appears on handwritten notes, in defendant Staten's distinctive style, seized from defendant Staten's home. The notations for Mr. Mayberry further list "gross-8893" and "Turbocard 204735595660." These entries match the gross wages and bank account number submitted on Mr. Mayberry's fraudulent 2010 income tax return.

140. Defendant Staten participated in the electronic filing, via her Apple computer, of a fraudulent 2010 income tax return in the name of **Emily Bauman**. Defendant Staten misappropriated an employer identity to create a fraudulent wage and tax statement supporting the fraudulent income tax return.

141. WDCI Special Agent Mark Howard found a digital image of a Wisconsin income tax return (Form 1A) for tax year 2010 in the name of Ms. Bauman, 2839 N. 35th Street, Milwaukee, WI on defendant Staten's computer.

142. WDOR records show a 2010 income tax return (Form 1A) was electronically filed in the name of Ms. Bauman, 2839 N. 35th Street, Milwaukee, WI on June 27, 2011. The return claimed a refund of withheld taxes in the amount of \$225. WDOR denied the claim.

143. The 2010 income tax return on defendant Staten's computer exactly matches the 2010 income tax return filed with WDOR in Ms. Bauman's name. They are the same document.

144. Ms. Bauman's 2010 income tax return, filed with WDOR, included an electronic wage and tax statement (Form W-2) purporting that Ms. Bauman earned \$8,894 dollars from K-Mart. The Form W-2 further purported the employer had withheld \$225 in state income taxes. This information was false.

145. I spoke with Mary Smigielski, Assistant General Counsel, K-Mart. Ms. Smigielski stated as follows. K-Mart did not employ Ms. Bauman in 2010. K-Mart gave no one permission to use their company's identity to fabricate a wage and tax statement (Form W-2) in Ms. Bauman's name. **COUNT 18**

146. Ms. Bauman's wage and tax statement (Form W-2) matches the template on the back defendant Staten's Enterprise Rent-A-Car invoice. See paragraphs 15(a)-(c) above.

147. Ms. Bauman's personal identifying information appears on notes, in defendant Staten's distinctive style, seized from defendant Staten's home. The entry in Ms. Bauman's name further lists "job- Kmart" and "gross-8893."

148. Defendant Staten participated in the electronic filing, via her Apple computer, of a fraudulent 2010 income tax return in the name of **Neil Zimmerman**.

149. WDCI Special Agent Mark Howard found a digital image of a Wisconsin income tax return (Form 1A) for tax year 2010 in the name of Mr. Zimmerman, 5173 N. 39th Street, Milwaukee, WI on defendant Staten's computer.

150. WDOR records show a 2010 income tax return (Form 1A) was electronically filed in the name of Mr. Zimmerman, 5173 N. 39th Street, Milwaukee, WI on September 2, 2011. The return claimed a refund of withheld taxes in the amount of \$183. WDOR denied the claim.

151. The 2010 income tax return on defendant Staten's computer exactly matches the 2010 income tax return filed with WDOR in Mr. Zimmerman's name. They are the same document.

152. Mr. Zimmerman's 2010 income tax return, filed with WDOR, included an electronic wages and tax statement (Form W-2) purporting that Mr. Zimmerman earned \$7,984 dollars from Human Resource Services, Inc. The Form W-2 further purported the employer had withheld \$183 in state income taxes. This information was false.

153. I spoke with Matthew Bare, Chief Relationship Officer, Human Service Resources, Inc. Mr. Bare stated as follows. Neil Zimmerman did not work for Human Service Resources, Inc. in 2010. Human Service Resources Inc. gave no one permission to use the company's identity to fabricate a wage and tax statement (Form W-2) in Mr. Zimmerman's name. **COUNT 19**

Fraudulent returns matching debit cards in defendant Staten's home

154. Defendant Staten participated in filing a fraudulent 2010 income tax return in the name of **Brandon Nash** on July 11, 2011.

a. WDOR records show a fraudulent 2010 income tax return was electronically filed in Mr. Nash's name requesting refund of \$225 on July 11, 2011. The income tax return included a fraudulent wage and tax statement in the name of employer Capitol Foods.

b. WDCI agents found a prepaid debit card in the name "Brandon Nash" in the defendant Staten's home. That prepaid debit card account received the refund of \$225 from the fraudulent 2010 income tax return in Mr. Nash's name. See paragraphs 28(a)-(e) above,

c. I spoke by telephone with Kozat Martin, Human Resources Manager, Capitol Foods. She reports that Capitol Foods did not employ Mr. Nash in 2010. Capitol Foods did not give anyone permission to use its entity identifying information to fabricate a 2010 wage and earning statement in Mr. Nash's name. **COUNT 20**

d. WDCI agents found notes in defendant Staten's home, in her distinctive handwriting style, listing Mr. Nash's name, date of birth, social security number, and Turbotax password. The notes further indicate "job-capitol food" and "state-\$225 -- recieved" (*sic*).

155. Defendant Staten participated in filing a fraudulent 2010 income tax return in the name of **Sade Willis** on October 10, 2011.

a. WDOR records show a fraudulent 2010 income tax was electronically filed in the name of Sade Willis on October 10, 2011. The return claimed refund of purportedly withheld state income taxes of \$91. A fraudulent wage and tax statement (Form W-2) was submitted in support of the claim purporting that Capitol Foods paid wages of \$5,986 to Ms. Willis and withheld \$91 in state taxes in 2010. The return requested the refund be wired to Green Dot Bank account number 20281872750. WDOR denied the refund.

b. WDCI agents found prepaid debit card no. 4852-4590-0187-8338 in the name "Sade Willis" in the defendant Staten's home.

c. Green Dot Bank records show as follows. Account number 20281872750 was opened in the name of Sade Willis on October 7, 2011. Prepaid debit card no. 4852-4590-0187-8338 was issued on this account and mailed to defendant Staten's home at 5788 N. 76th Street.

d. I spoke by telephone with Kozat Martin, Human Resources Manager, Capitol Foods. She reports that Capitol Foods did not employ Ms. Willis in 2010. Capitol Foods did not give anyone permission to use its entity identifying information to fabricate a 2010 wage and earning statement in Ms. Willis' name. **COUNT 21**

e. WDCI agents found notes in defendant Staten' home, in her distinctive handwriting, listing Ms. Willis' name, date of birth, social security number; and Turbotax password. The notes further indicate "\$5986" and "St - \$91".

156. Defendant Staten participated in filing a fraudulent 2010 income tax return in the name of **Geneva Loveless** on August 4, 2011.

a. WDOR records show a fraudulent 2010 income tax was electronically filed in the name of Geneva Loveless on August 4, 2011. The return claimed refund of purportedly withheld state income taxes of \$183. A fraudulent wage and tax statement (Form W-2) was submitted in support of the claim purporting that Human Resource Services, Inc., paid wages of

\$7,984 to Ms. Willis and withheld \$183 in state taxes in 2010. The return requested the refund be wired to Green Dot Bank account number 200074961638. WDOR denied the refund.

b. WDCI agents found prepaid debit card no. 4852-4590-165-5140 in the name "Geneva Loveless" in the defendant Staten's home.

c. Green Dot Bank records show as follows. Account number 200074961638 was opened in the name of Geneva Loveless on August 2, 2011. Prepaid debit card no. 4852-4590-0165-5140 was issued on this account and mailed to defendant Staten's home at 5766 N. 76th Street.

d. I spoke by telephone with Matthew Bare, Chief Relationship Officer, Human Resources Services, Inc. He reports that Human Resources Services, Inc. did not employ Ms. Loveless in 2010. Human Resources Services, Inc., did not give anyone permission to use its entity identifying information to fabricate a 2010 wage and earning statement in Ms. Loveless' name. **COUNT 22**

e. WDCI agents found notes in defendant Staten' home, in her distinctive handwriting, listing Ms. Loveless' name, date of birth, social security number, and related Turbotax password notes. The notes further indicate "Human Res." and "state -183".

157. Defendant Staten participated in filing a fraudulent 2010 income tax return in the name of **Melvenia Cobb** on July 26, 2011.

a. WDOR records show a fraudulent 2010 income tax was electronically filed in the name of Melvenia Cobb on July 26, 2011. The return claimed refund of purportedly withheld state income taxes of \$275. A fraudulent wage and tax statement (Form W-2) was submitted in support of the claim purporting that Human Resource Services, Inc., paid wages of \$9,971 to Ms. Cobb and withheld \$275 in state taxes in 2010. The return requested the refund be wired to Green Dot Bank account number 204498471844. WDOR denied the refund.

b. WDCI agents found prepaid debit card no. 4852-4590-0187-8338 in the name "Melvenia Cobb" in the defendant Staten's home.

c. Green Dot Bank records show as follows. Account number 204498471844 was opened in the name of Melvenia Cobb on July 24, 2011. Prepaid debit card no. 4852-4500-1694-1781 was issued on this account.

d. I spoke by telephone with Matthew Bare, Chief Relationship Officer, Human Resources Services, Inc. He reports that Human Resources Services, Inc. did not employ Ms. Cobb in 2010. Human Resources Services, Inc., did not give anyone permission to use its entity identifying information to fabricate a 2010 wage and earning statement in Ms. Cobb' name. **COUNT 23**

e. WDCI agents found notes in defendant Staten' home listing Ms. Cobb's name, date of birth, social security number, and Turbotax password. The notes further indicate "gross - 9971" and "State - 275."

Fraudulent returns and claims using defendant Staten's addresses

158. Defendant Staten participated in the filing of a fraudulent 2010 income tax return in the name of **Lonnie Holman** using defendant Staten's own home address of 5766 N. 76th Street.

159. WDOR records show an income tax return was electronically filed in the name of Mr. Holman on January 28, 2011. The return claimed a refund of withheld taxes in the amount of \$284. WDOR approved the claim and wired the refund to a prepaid debit card account. The return included an electronically filed wage and tax statement (Form W-2) purporting that Mr. Holman earned \$11,968 from Temps Plus Temporary Services, Inc. during 2010. The Form W-2 further purported the employer had withheld \$374 in state income taxes. This information was false.

160. I spoke with Alice Grant, Payroll Manager, Temps Plus Temporary Services, Inc. Ms. Grant stated that Lonnie Holman did not work for Temps Plus Temporary Services, Inc. in 2010. Temps Plus Temporary Services, Inc. did not give anyone permission to use the company's identity to fabricate a wage and tax statement (Form W-2) in Mr. Holman's name. **COUNT 24**

161. The income tax return listed Mr. Holman's address as 5766 N. 76th Street, Milwaukee, WI. This address is defendant Staten's home.

162. During their search of defendant Staten's home on May 31, 2012, WDCI agents found notes, in defendant Staten's distinctive handwriting style, listing Mr. Holman's name, date of birth, and social security number. The entry for Mr. Holman further listed "occup - Temp plus" and "gross - 11967."

163. Defendant Staten participated in the filing of a fraudulent 2011 homestead credit claim in the name of **Morris Flowers** using defendant Staten's home address of 5766 N. 76th Street. **COUNT 25**

164. WDOR records contain a copy of a 2011 homestead credit claim and supporting rent payment certificate filed on April 5, 2012 in the name of Mr. Flowers. The claim requested payment of \$1,076 and included the following false information.

a. Mr. Flowers' income in 2011 was \$9,436.

b. Mr. Flowers paid rent of \$500/month from January 1, 2011 to December 31, 2011 to live at 3806 N. 38th Street, Milwaukee, WI. The purported landlord was Tamora Perry.

c. Mr. Flowers' current address was 5766 N. 76th Street, Milwaukee, WI.

165. The above rent payment certificate is fraudulent. I spoke to Bruce Martin. Mr. Martin stated that he, and not Tamorra Perry, is the owner and landlord of 3806 N. 38th Street. Mr. Martin never had any tenant by the name of Morris Flowers.

166. The income figure, on the above homestead credit claim, is fraudulent. WDOR records show a 2011 income tax return was concurrently filed in Mr. Flowers' name. That return includes a fraudulent wage and tax statement (Form W-2) purporting Mr. Flowers earned \$9,437 from Capitol Food in 2011. I spoke with Kozat Martin, Human Resources Manager, Capitol Foods. Ms. Martin stated Capitol Foods did not employ Mr. Flowers in 2011.

167. The street addresses on Mr. Flowers's homestead credit claim form and rent payment certificate are handwritten in defendant Staten's distinctive manner. The cardinal directions are written in superscript.

168. WDOR mailed a check dated April 17, 2012 for \$1,076 payable to Mr. Flowers in payment of the homestead credit claim. The check was mailed to defendant Staten's home at 5766 N. 76th Street.

169. Mr. Flowers' personal identifying information appears on notes, in defendant Staten's distinctive handwriting style, seized from defendant Staten's home. The entry in Mr. Flowers name further lists "Do Homestead."

170. Defendant Staten participated in the filing of a fraudulent 2011 homestead credit claim in the name of **Terry Brooks** using the address of a property that defendant Staten owned at 4968 N. 26th Street. **COUNT 26**

171. WDOR records contain a copy of a 2011 homestead credit claim and supporting rent payment certificate filed on April 17, 2012. The claim requested payment of \$940 and included the following false information.

a. Mr. Brooks' income in 2011 was \$11,337.

b. Mr. Brooks paid rent of \$500/month from January 1, 2011 to December 31, 2011 to live at 4743 N. 52nd Street, Milwaukee, WI. The purported landlord was Ronald Prisuda.

c. Mr. Brooks' current address was 4968 N. 26th Street, Milwaukee, WI.

172. The above rent payment certificate is fraudulent. The purported landlord, Mr. Prisuda, told me that he never had any tenant by the name of Terry Brooks.

173. The income figure, on the above homestead credit claim, is fraudulent. WDOR records show a 2011 income tax return was concurrently filed in Mr. Brooks' name. That return includes a fraudulent wage and tax statement (Form W-2) purporting Mr. Brooks earned \$11,338 from Target, Inc. in 2011. I spoke with Mandy Crabbs, Asset Protection Manager, Target Corporation. Ms. Crabbs stated Target did not employ Mr. Brooks in 2011.

174. The street addresses on Mr. Brooks' homestead credit claim form and rent payment certificate are handwritten in defendant Staten's distinctive style.

175. WDOR mailed a check dated May 1, 2012 for \$940 payable to Mr. Brooks in payment of the homestead credit claim. The check was mailed to defendant Staten's property at 4968 N. 26th Street.

176. Mr. Brooks' personal identifying information appears on notes, in defendant Staten's distinctive handwriting style, seized from defendant Staten's home.

177. Defendant Staten participated in the filing of a fraudulent 2011 homestead credit claim in the name of **Benjamin White** using the address of a property that defendant Staten owned at 4968 N. 26th Street. **COUNT 27**

178. WDOR records contain a copy of a 2011 homestead credit claim and supporting rent payment certificate filed on April 17, 2012. The claim requested payment of \$996 and included the following false information.

a. Mr. White's income in 2010 was \$10,574.

b. Mr. White paid rent of \$500/month from January 1, 2011 to December 31, 2011 to live at 3524 N. 38th Street, Milwaukee, WI. The purported landlord was Digna Williams.

c. Mr. White's address was 4968 N. 26th Street, Milwaukee, WI.

179. The above rent payment certificate is fraudulent. The purported landlord, Ms. Williams, told me that she never had any tenant by the name of Benjamin White.

180. The income figure, on the above homestead credit claim, is fraudulent. WDOR records show a 2011 income tax return was concurrently filed in Mr. White's name. That return includes a fraudulent wage and tax statement (Form W-2) purporting Mr. White earned \$10,575 from PA Staffing in 2011. I spoke with Lynn Sheldon, Payroll Accounting Assistant, PA Staffing. Ms. Sheldon stated PA Staffing did not employ Mr. White in 2011.

181. The street addresses on Mr. White's homestead credit claim form and rent payment certificate are handwritten in defendant Staten's distinctive style.

182. WDOR mailed a check dated May 1, 2012 for \$996 payable to Mr. White in payment of the homestead credit claim. The check was mailed to defendant Staten's property at 4968 N. 26th Street.

183. Mr. White's personal identifying information appears on notes, in defendant Staten's distinctive handwriting style, seized from defendant Staten's home. The entry in Mr. White's name further lists "Homestead" and "Accepted."

184. Defendant Staten participated in the filing of a fraudulent 2011 homestead credit claim in the name of **Susan Fiedler** using the address of a property that defendant Staten owned at 4968 N. 26th Street. **COUNT 28**

185. WDOR records contain a copy of a 2011 homestead credit claim and supporting rental payment certificate filed on May 29, 2012. The claim requested payment of \$1,156 and included the following false information.

a. Ms. Fiedler's income in 2011 was \$8,274.

b. Ms. Fiedler paid rent of \$500/month from January 1, 2011 to December 31, 2011 to live at 827 W. Burleigh, Milwaukee, WI. The purported landlord was Saleem Abdullah.

c. Ms. Fiedler's address was 4968 N. 26th Street, Milwaukee, WI.

186. On November 9, 2012, I interviewed adult citizen Susan Fiedler. Ms. Fiedler stated as follows. She has resided at Waukesha Springs Health and Rehabilitation Center since 2004 and has never lived at 4968 N. 26th Street. Ms. Fiedler viewed the 2011 homestead credit claim filed in her name. She did not prepare or file the claim. The signature on the claim in her name is a forgery. She did not give anyone permission to file such a claim in her name.

187. The street addresses on Ms. Fiedler's homestead credit claim form and rent payment certificate are handwritten in defendant Staten's distinctive style.

188. WDOR mailed a check dated June 20, 2012 for \$1,156 payable to Ms. Fiedler in payment of the homestead credit claim. The check was mailed to defendant Staten's property at 4968 N. 26th Street.

189. Ms. Fiedler's personal identifying information appears on notes, in defendant Staten's distinctive handwriting style, seized from defendant Staten's home.

Conspiracy

190. Defendant Tawanda Staten acted in conspiracy with other persons, including her sisters Sharon Staten and Angela Staten, in perpetrating the tax fraud scheme described in this criminal complaint.

191. Defendant Tawanda Staten and Sharon Staten were jointly involved in the fraudulent homestead credit claims filed in the names of Kendrick DuBose and Christopher Pounes. The homestead credit claim checks were mailed to 5344 N. 38th Street, Milwaukee, WI. This address was Sharon Staten's home. Defendant Tawanda Staten signed and negotiated the checks. See paragraphs 62-69 and 78-85 above.

192. Defendant Tawanda Staten and Sharon Staten shared lists of personal identities used in their tax fraud scheme.

a. Forensic Analyst Bast found latent fingerprints of both defendant Staten and Sharon Staten on the same notebook containing tax fraud notes. Police found that notebook in defendant Staten's home. See paragraphs 23 and 24 above.

b. WDCI agents executed a search warrant on Sharon Staten's home at 5344 N. 38th Street on May 31, 2012. Agents seized notebooks and scrap papers listing other peoples' personal identifying information. In dozens of instances, WDCI agents found these same personal identities in notes seized from defendant Tawanda Staten's home. Numerous fraudulent income tax returns and homestead credit claims were filed under these shared personal identities.

193. Defendant Tawanda Staten, Angela Staten, and Sharon Staten, shared lists of employers for their tax fraud scheme.

a. Both defendant Tawanda Staten and Angela Staten participated in filing fraudulent income tax returns using the following purported employers: PA Staffing, Inc., and Capitol Food.

b. Both defendant Tawanda Staten and Sharon Staten participated in filing fraudulent income tax returns using the following purported employers: Capitol Foods, K-Mart Corporation, PA Staffing, Seek Careers/Staffing Inc., Spherion Staffing Inc., Temps Plus Temporary Services, Inc., U-Line Corporation, and Wal-Mart Associates, Inc.

194. I interviewed adult citizen, Lena Adams. Ms. Adams stated as follows. Ms. Adams is a close relative of Angela Staten, Sharon Staten, Shilda Staten, and defendant Tawanda Staten. The four women are sisters. They all file fraudulent tax returns. Defendant Tawanda Staten works most closely with Angela Staten in the fraud scheme. An inmate in the Mississippi prison system provides prisoner identities to defendant Tawanda Staten. Defendant Tawanda Staten uses these identities to file fraudulent tax returns.

195. I listened to recorded telephone calls that Anthony Coleman made to his girlfriend, Angela Staten, while he was imprisoned at Fox Lake Correctional Institution in February and March 2010. In those calls, Angela Staten discussed numerous fraudulent income tax returns that she was filing. On several occasions, Angela Staten states that she was receiving help from "her sisters" in filing fraudulent income tax returns.

196. Defendant Staten stated, in her interview on November 11, 2012, that she and Lakeisha Adams cooperate in filing fraudulent income tax returns. See paragraphs 18-21 above.

197. My investigation identified more than two thousand fraudulent income tax returns and homestead credit claims involving the Staten sisters. These fraudulent returns and claims resulted in the State of Wisconsin being defrauded out of \$234,390.

198. As described above, circumstantial and direct evidence specifically links defendant Tawanda Staten to two hundred five fraudulent income tax returns and fraudulent homestead credit claims. Those fraudulent returns and claims resulted in fraud losses of \$89,298.

199. All funds that the WDOR paid out in the above described fraud scheme were drawn on an account the State of Wisconsin holds with U.S. Bank, 777 East Wisconsin Ave., Milwaukee, WI.

Habitual criminality

200. Defendant Staten was convicted of three misdemeanors within five years of the presently charged offenses and is therefore an habitual criminal within the definition of section 939.62, Wis. Stats.

a. Official records maintained by the Clerk, Waukesha County Circuit Court, show defendant Staten was convicted, on July 8, 2010, of misdemeanor retail theft in *State v. Tawanda Staten, Case No. 09CM002448*.

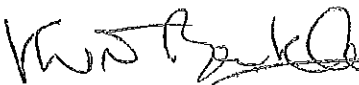
b. Official records maintained by the Clerk, Milwaukee County Circuit Court, show defendant Staten was convicted, on October 8, 2007, of misdemeanor retail theft *State v. Tawanda Staten, Case No. 07CM006674*.

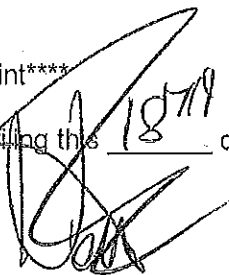
c. Official records maintained by the Clerk, Racine County Circuit Court, show defendant Staten was convicted, on November 13, 2007, of misdemeanor retail theft in *State v. Tawanda Staten, Case No. 07CM002051*.

These convictions remain unreversed and a matter of record. Certified copies of the judgments of conviction are attached and incorporated herein by reference.

****End of Complaint****

Subscribed and sworn to before me and approved for filing this 18th day of February, 2015.


Kurt B. Benkley
Assistant District Attorney
1021096


Complaining Witness