

STATE OF WISCONSIN

CIRCUIT COURT
CRIMINAL DIVISION

MILWAUKEE COUNTY

CRIMINAL COMPLAINT

STATE OF WISCONSIN

DA Case No.:2015ML000651

Plaintiff,

vs.

Complaining Witness:

Special Agent Vern Barnes

Staten, Angela L.
2317 W. Nash Street
Milwaukee, WI 53206
DOB: 07/04/1977

Court Case No.:

Coleman, Anthony A.
4160 N. Port Washington Road
Glendale, WI 53212
DOB: 09/25/1973

Court Case No.:

Defendants,

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 (As to defendants Angela L. Staten and Anthony A. Coleman)

The above-named defendants during January 1, 2010 to April 16, 2010, at 3129 West Garfield Ave., Milwaukee, 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 that he or she is acting with the authorization or consent of 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 defendants 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 defendants are repeaters, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 2: CONSPIRACY TO COMMIT UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS, REPEATER (As to defendant Angela L. Staten)

The above-named defendant during April 17, 2010 to December 31, 2012, at 3347 North 38th 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 that she is 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 3: THEFT BY FRAUD (VALUE EXCEEDING \$10,000) - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant during January 1, 2010 to December 31, 2012, at 777 East Wisconsin Ave., in the City of Milwaukee, and other locations within Milwaukee County, Wisconsin, as a party to a crime, did obtain title to property of Wisconsin Department of Revenue, having a value exceeding \$10,000, by intentionally deceiving that person with a false representation known by defendant to be false, made with intent to defraud and which did defraud that person, contrary to sec. 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 4: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendants Angela L. Staten and Anthony A. Coleman)

The above-named defendants, on or about February 16, 2010, at 3129 West Garfield Ave., in the City of Milwaukee, or some other location 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 he or 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 defendants 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 defendants are repeaters, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 5: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendants Angela L. Staten and Anthony A. Coleman)

The above-named defendants, on or about February 16, 2010, at 3129 West Garfield Ave., in the City of Milwaukee, or some other location 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 he or 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 defendants 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 defendants are repeaters, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 6: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendants Angela L. Staten and Anthony A. Coleman)

The above-named defendants, on or about February 16, 2010, at 3129 West Garfield Ave., in the City of Milwaukee, or some other location 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 he or 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 defendants 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 defendants are repeaters, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 7: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendants Angela L. Staten and Anthony A. Coleman)

The above-named defendants, on or about February 15, 2010, at 3129 West Garfield Ave., in the City of Milwaukee, or some other location 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 he or 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 defendants 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 defendants are repeaters, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 8: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendants Angela L. Staten and Anthony A. Coleman)

The above-named defendants, on or about February 17, 2010, at 3129 West Garfield Ave., in the City of Milwaukee, or some other location 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 he or 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 defendants 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 defendants are repeaters, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 9: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendants Angela L. Staten and Anthony A. Coleman)

The above-named defendants, on or about March 2, 2010, at 3129 West Garfield Ave., in the City of Milwaukee, or some other location 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 he or 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 defendants 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 defendants are repeaters, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 10: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendants Angela L. Staten and Anthony A. Coleman)

The above-named defendants, on or about February 26, 2010, at 3129 West Garfield Ave., in the City of Milwaukee, or some other location 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 he or 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 defendants 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 defendants are repeaters, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 11: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendants Angela L. Staten and Anthony A. Coleman)

The above-named defendants, on or about February 26, 2010, at 3129 West Garfield Ave., in the City of Milwaukee, or some other location 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 he or 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 defendants 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 defendants are repeaters, having been convicted of at least one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 12: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about April 4, 2011, at 2629 North 8th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 13: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about March 21, 2011, at 2629 North 8th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 14: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about January 27, 2011, at 2629 North 8th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 15: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about January 26, 2011, at 2629 North 8th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

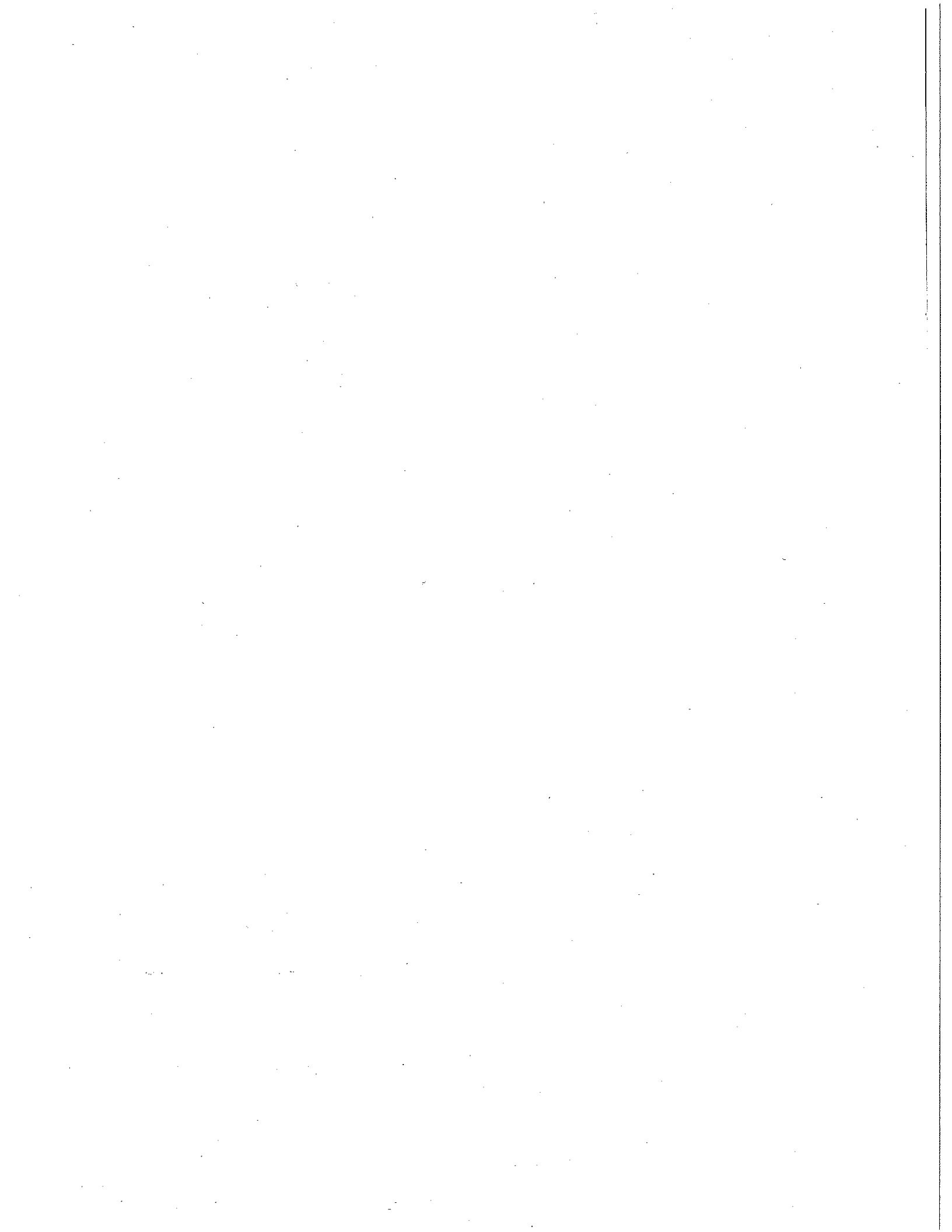
Count 16: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about July 1, 2011, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.





Count 17: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about January 19, 2012, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 18: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about January 26, 2011, at 2629 North 8th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 19: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about January 15, 2010, at 3139 West Garfield Ave., in the City of Milwaukee, or some other location 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 (As to defendant Angela L. Staten)

The above-named defendant, on or about January 19, 2012, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 21: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about October 3, 2011, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 22: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about January 20, 2012, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 23: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about October 3, 2011, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 24: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about January 19, 2012, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 25: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about July 7, 2011, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 26: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about January 19, 2012, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 27: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about September 12, 2011, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 28: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about January 23, 2012, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 29: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about January 19, 2012, at 2902 North 36th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 30: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about July 25, 2011, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 31: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about September 20, 2011, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 32: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about October 3, 2011, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 33: UNAUTHORIZED USE OF AN ENTITY'S IDENTIFYING INFORMATION OR DOCUMENTS - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about October 17, 2011, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 34: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about March 18, 2011, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 35: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about March 23, 2011, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 36: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about June 16, 2011, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 37: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about April 18, 2011, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 38: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about March 21, 2011, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 39: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about June 9, 2011, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

Count 40: FRAUDULENT CLAIM/INCOME TAX CREDIT - PTAC, AS A PARTY TO A CRIME, REPEATER (As to defendant Angela L. Staten)

The above-named defendant, on or about March 18, 2011, at 3347 North 38th Street, in the City of Milwaukee, or some other location 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 one felony during the five year period immediately preceding the commission of this offense, which remains of record and unreversed, the maximum term of imprisonment for this offense may be increased by not more than four years, if the prior conviction was a felony.

1. I have been employed with the Wisconsin Department of Revenue (WDOR) for thirty-one years. For the last twenty-six 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 2010 through 2012, defendant Angela Staten engaged in a tax fraud conspiracy that defrauded the State of Wisconsin out of more than **\$234,390**. Defendant Anthony Coleman participated until he withdrew from the conspiracy on April 16, 2010. Defendant Staten, together with defendant Coleman, her sisters Tawanda Staten and Sharon 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 statement (Form W-2)s, 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 likely also defrauded the United States Department of Treasury out 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. During February 2010, defendant Staten's boyfriend, defendant Coleman, was incarcerated at Fox Lake Correctional Institute. In recorded calls on the prisoner telephone system, defendant Coleman and defendant Staten extensively discussed using inmates' identities to file fraudulent income tax returns. Defendant Coleman provided fellow inmates' names and social security numbers to defendant Staten. Immediately after the calls, defendant Staten used these identities to file fraudulent income tax returns with WDOR. On or about April 16, 2010, defendant Coleman self-reported to prison officials that he and defendant Staten were engaged in this tax fraud scheme.

5. Defendant Staten electronically filed fraudulent income tax returns from computers identifiable to her. WDOR electronic tax filing system captures the internet protocol (IP) addresses of the computers used to file income tax returns. Time Warner Cable provided records listing defendant Staten's subscriber internet protocol addresses for Fall 2011. Six fraudulent income tax returns originated from defendant Staten's subscriber internet protocol addresses. In numerous other instances, fraudulent income tax returns were filed from internet protocol addresses circumstantially linked to defendant Staten.

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 3347 N. 38th Street, Milwaukee, WI, Milwaukee, WI. Agents found Internal Revenue Service letters addressed to seven persons and a WDOR letter addressed to an eighth person at 3347 N. 38th

Street, Milwaukee, WI. Fraudulent income tax returns and homestead credit claims for tax year 2011 were filed, with the WDOR, under all of these identities.

7. On November 12, 2012, East Troy Police arrested defendant Staten and defendant Coleman during a traffic stop. Police found handwritten notes, in defendant Staten's purse, of six State of Wisconsin and State of Mississippi prisoners' names, dates of birth, and social security numbers. These same prisoner identities were used to file fraudulent income tax returns with the WDOR.

8. I questioned defendant Staten about her fraudulent income tax and homestead credit claim scheme. She admitted as follows. Her boyfriend, defendant Coleman, provided the identities of at least three Fox Lake Correctional Institute prisoners, and, she filed fraudulent income tax returns in their names. Defendant Staten also participated in filing a fraudulent 2009 income tax return in her own name.

9. I questioned defendant Coleman about his involvement in the fraud scheme. Defendant Coleman admitted he provided Fox Lake Correctional Institution prisoner identities to defendant Staten so that she could file fraudulent income tax returns in their names.

Defendant Staten's residence

10. Wisconsin Department of Motor Vehicle (WDMV) provided motor vehicle driver records for defendant Staten. Those records include "Primary Address History" listing defendant Staten's residences as follows:

2317 W. Nash Street, Milwaukee, WI (3/22/07-1/20/10);

3129 W. Garfield Ave, Milwaukee, WI (1/20/10-10/31/10);

2629 N. 8th Street, Milwaukee, WI (10/31/10-5/20/11);

3129 W. Garfield Ave, Milwaukee, WI (5/20/11-6/29/11);

3347A N. 38th Street, Milwaukee, WI (6/29/11-10/1/13).

Many of the fraudulent income tax returns in this criminal complaint list defendant Staten's above addresses as the tax filers' home.

11. Defendant Staten electronically filed her own income tax return for tax year 2009 on January 15, 2010. That return lists defendant Staten's home address as 3129 W. Garfield Street, Milwaukee, WI.

Interview of defendant Anthony Coleman

12. On April 16, 2010, I interviewed defendant Anthony Coleman at the Fox Lake Correctional Institute, Fox Lake, WI. Defendant Coleman stated as follows.

a. Defendant Coleman had been incarcerated at Fox Lake Correctional Institute since February 2009.

b. Defendant Coleman is boyfriend to defendant Staten.

c. Defendant Coleman and defendant Staten worked together to file fraudulent income tax returns. Defendant Coleman provided defendant Staten with the identities of fellow prison inmates in the months prior to the interview. He provided this information by calls made on the prisoner telephone system. Defendant Staten filed fraudulent tax returns using these identities.

d. Defendant Coleman gave defendant Staten the identities of the following inmates: Robert Hruska, Bernell Kelly, Corey Porter, Michael St. Sauver. Some of these inmates spoke directly to defendant Staten on the telephone.

e. Defendant Coleman last spoke to defendant Staten in March 2010. At that time, she was living at 3129 W. Garfield Avenue, Milwaukee, WI.

Prison telephone calls

13. Captain Brian Schueler, Wisconsin Department of Correction (WDOC), works at the Fox Lake Correctional Institution. He provided recordings of all telephone calls that defendant Coleman placed on the prisoner telephone system from February 11, 2010 through March 7, 2010.

14. The telephone calls described in paragraphs 17-34 below were recorded on the Fox Lake Correctional Institution prisoner telephone system. The calls all were made from defendant Coleman's account to telephone number 414-449-3655.

15. During the execution of a search warrant on defendant Staten's home at 3347 N. 38th Street, Milwaukee, WI on May 31, 2012, police found an AT&T billing statement dated March 1, 2010 for the above telephone account number 414-449-3655. The bill is for a landline telephone account and is addressed to defendant Coleman at 3129 W. Garfield Avenue, Milwaukee, WI.

16. Milwaukee County Sheriff's Department records show defendant Staten served an incarceration sentence from January 27, 2010 through May 19, 2010. Inmate demographic data shows defendant Staten's home address as 3129 W. Garfield Avenue, Milwaukee, WI and her telephone number as 414-449-3655.

17. Milwaukee County Sheriff's Department released defendant Staten to serve her incarceration sentence at home on electronic monitoring bracelet. In many of the prisoner telephone system calls, defendant Staten complained about having to wear an electronic monitoring bracelet. The prisoner telephone system references these calls as nos. 1266072115 at minute 8:20 (2/13/10); 1266166535 at minute 4:02 (2/14/10); 266169963 at minute 7:22 (2/14/10); 1267108471 at minute 9:00 (2/25/10).

18. In several of the prisoner telephone system calls to 414-449-3655, defendant Coleman addressed defendant Staten by her first name, "Angela." See call no. 1266169963 at minute 1:29 (2/14/10).

19. Defendant Coleman and defendant Staten spoke on one hundred forty-five (145) occasions, via prisoner telephone system calls, during February 13-26, 2010. In many of those telephone calls, the defendants explicitly discussed filing fraudulent tax returns using prisoner identities.

20. Defendant Staten referred to her tax fraud scheme as obtaining money from "the tooth fairy." Call no. 1266077729 at 8:30 (2/13/10). She also referred to anticipated income tax refunds under prisoner identities as "free money." See call no. 1266177696 at minute 10:45 (2/14/10).
21. Defendant Staten repeatedly asked defendant Coleman to provide her with more inmate names and social security numbers. See call nos. 1266085108 at minute 2:02 (2/13/10); 1266176686 at minute 12:40 (2/14/10); 1266720380 at minute 7:05 (2/20/10).
22. Defendant Staten never asked for any wages and earnings information from the prisoners. In call no. 1266197106 on February 14, 2010, defendant Staten spoke directly to prisoner Bernell Kelly (at minute 1:20) and prisoner Corey Porter (at minute 5:00) about filing income tax returns in their names. In call no. 1266264198 (at minute 6:25) on February 14, 2010, defendant Staten spoke directly to prisoner Michael St. Sauver about filing an income tax return in his name. In each of these conversations, defendant Staten obtained the prisoners' social security numbers and promised to file tax returns in their names, but she never inquired about their income. This omission shows defendant Staten intended to falsify the income information on the income tax returns.
23. Defendant Staten repeatedly discussed manipulating income tax return data to avoid Internal Revenue Service scrutiny. She explained that she keeps income levels and tax refund claims low to increase the likelihood that income tax refunds would be approved.
- a. In call no. 1266283033 (at minute 2:40) on February 16, 2010, defendant Staten explained that she "learned not to go over certain gross amount" when filing income tax returns.
- b. In call no. 1266264778 (at minute 1:19) on February 16, 2010, defendant Staten referred to income tax refund amounts and said "she kept them all under three thousand because a lot of them don't have dependents and it make it look good for the IRS."
- c. In call no. 1266331802 (at minute 9:00) on February 16, 2010, defendant Staten stated that "her sister told her to keep it under a certain amount 'cause the IRS is getting strict."
24. Defendant Staten stated she would split the income tax refunds with each prisoner. See call nos. 1266197106 at minute 4:10 and minute 7:00 (2/14/10); 1266713862 at minute 15:00 (2/20/10). She would mail the prisoners' shares in the form of Western Union checks. She said she would put a fake name on the checks as remitter. Call no. 1266626895 at minute 11:15 (2/19/10).
25. Defendant Staten said she directs IRS and WDOR to wire income tax refunds to prepaid debit cards. Defendant Staten discussed her attempts to set up a prepaid debit card to receive an income tax refund for prisoner Bernell Kelly. Call no. 1266331802 at minute 10:30 (2/16/10); call no. 1266197106 at minute 3:25 (2/14/10); call no. 126628303 at minute 2:30 (2/15/10).
26. Defendant Staten discussed how her sister, Sheila Staten (aka Shelda Staten), was helping her file prisoner income tax returns.
- a. In call no. 1266283033 at minute 0:50 (2/15/10), defendant Staten said Sheila Staten "walked me through Hruska."

b. In call no. 1266245555 at minute 2:00 (2/15/10), defendant Staten described her problems filing prisoner income tax returns via computer. She "will have to have Sheila come over and do the state."

c. In call no. 1267150824 at minute 14:25 (2/25/10), defendant Staten said that she asked her sister to put in the income tax return for the "white dude" prisoner.

27. Defendant Staten and defendant Coleman worked together to file a fraudulent income tax return under the name of prisoner, **Robert Hruska**. Defendant Staten misappropriated an employer identity to create a fraudulent wage and tax statement (Form W-2) supporting the fraudulent income tax return. **COUNT 4**

a. In call no. 1266177696, defendant Coleman told defendant Staten that he had another name. The conversation proceeded as follows at minute 1:10 (2/14/10):

Staten: Spell the first name? I can't misspell nothing.

Coleman: Robert. R-O-B-E-R-T.

Staten: Hmm hmm.

Coleman: H-R-U-S-K-A.

Staten: H-R-U-S-K-A?

Coleman: Yeah.

Staten: This sound like a white person.

Coleman: I don't know, but birthday is [REDACTED].

Staten: Okay. Social?

Coleman: 388-90- [REDACTED]

Staten: Ask him how much he want.

Coleman: Man... [unintelligible]... the mom gave you that information.

Staten: Who's the mom?

Coleman: The one you doing this... the first one for... Doran [sic: Dorian]...

Staten: Where he get this from?

Coleman: From one of the guys he knows, man.

Staten: Where do I send they money?

Coleman: Just put it on they books.

Staten: If they want...if they want...ahh...If they...Tell them if they get accepted...And if they do get the money... 'Cause you can't get accepted and the IRS don't got to give you nothing. But if they get accepted ... umm...where do they want me to send they...I know I got to give his money to his girl.

* * *

Staten: 'Cause I'll send a cashier's check.

Coleman: [unintelligible]... you get your thirty-five... Can you [unintelligible] yours back?

Staten: Dude. What they all think this is? You all getting free money.

Coleman: [Aside] She says you all getting free money.

b. In call no. 1266342862 at minute 2:50 (2/16/2010), defendant Staten told defendant Coleman that she was typing information for "Robert Hurskey" (*sic: Robert Hruska*) as they spoke, and then, she orally recited bank routing number "0973972181" and account number "90102839859." The prison telephone system shows this call commenced at 11:54 a.m. on February 16, 2014.

c. The above information corresponds to the income tax return filed in the name of Robert Hruska for tax year 2009. WDOR records show Mr. Hruska's return was filed electronically at 12:03 p.m. on February 16, 2010. The return requested the refund be wired to account no. 90102839859 held at bank routing number 0973972181.

d. Bank routing number 0973972181 is assigned to Metabank. Metabank provides prepaid bank cards. The above account information corresponds to the format for a prepaid debit card.

e. The income tax return for Robert Hruska also included an electronically filed wages and tax statement (Form W-2) purporting income and withheld taxes from Custom Staffing Solutions, Inc.

f. I spoke with Bruce Chesshire, General Counsel, Custom Staffing Solutions. Mr. Chesshire stated that Robert Hruska did not work Custom Staffing Solutions in 2009. Custom Staffing Solutions, Inc. did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Mr. Hruska.

g. WDOC records show that Robert Hruska was incarcerated from March 19, 2009 to March 26, 2009 and from July 13, 2009 to September 30, 2010.

28. Defendant Staten and defendant Coleman worked together to file a fraudulent income tax return under the name of prisoner, **Bernell Kelly**. Defendant Staten misappropriated an employer identify to create a fraudulent wage and tax statement (Form W-2) supporting the fraudulent income tax return. **COUNT 5**

a. In call no. 1266197106 at minute 1:20 (2/14/10), defendant Coleman called defendant Staten. During that call, defendant Coleman passed the telephone receiver to Bernell Kelly. Mr. Kelly spoke directly with defendant Staten. Mr. Kelly and defendant Staten discussed filing

an income tax return in Mr. Kelly's name. In that conversation, Mr. Kelly spelled out his name and provided his birthdate and social security number (352-68-****).

b. WDOR records show an income tax return for tax year 2009 was electronically filed in the name of Bernell Kelly with the above social security number on February 16, 2010. The return included an electronically filed wages and earnings statement (Form W-2) purporting income and withheld taxes from Preferred Staffing, Inc.

c. I spoke with Bruce Chesshire, General Counsel, Preferred Staffing. Mr. Chesshire stated that Bernell Kelly did not work Preferred Staffing in 2009. Preferred Staffing did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Mr. Kelly.

d. The income tax return also listed Bernell Kelly's home address as 3129 W. Garfield Ave, Milwaukee, WI. As recited in paragraphs 10 and 11 above, defendant Staten resided at 3129 W. Garfield Ave, Milwaukee, WI when the return was filed.

e. In call no. 1266330183 at minute 8:10 (2/16/10), defendant Coleman and defendant Staten discussed the status of Mr. Kelly's income tax return. Defendant Coleman stated that Mr. Kelly has been "locked up since three years."

f. In call no. 1267108471 at minute 2:15 (2/25/10), Mr. Kelly talked directly with defendant Staten using defendant Coleman's prisoner telephone account. They discussed the federal and state income tax returns that defendant Staten filed in Mr. Kelly's name. During the conversation, defendant Staten called the Internal Revenue Service refund hotline in a three-way call with Mr. Kelly. Mr. Kelly recited his social security number when prompted by the automated system, but the system could not understand him.

g. WDOC records show that Bernell Kelly was incarcerated from April 6, 2009 to September 4, 2012. He was housed at the Fox Lake Correctional Institution throughout February 2010.

29. Defendant Staten and defendant Coleman worked together to file a fraudulent income tax return under the name of prisoner, **Dorian Harris**. Defendant Staten misappropriated an employer identity to create a fraudulent wage and tax statement (Form W-2) supporting the fraudulent income tax return. **COUNT 6**

a. In call no. 1266329185 at minute 0:40 (2/16/10), defendant Staten and defendant Coleman discussed income tax returns she had filed in the names of Dorian Harris, Robert Hruska, and Corey Porter. Defendant Staten stated "[t]he only person that accepted was Doran [sic: Dorian] Lamont Harris."

b. In call no. 1266342862 at minute 1:00 (2/16/10), defendant Staten again told defendant Coleman that "Doran [sic: Dorian] Lamont Harris got accepted."

c. WDOR records show an income tax return for tax year 2009 was electronically filed in the name of Dorian Lamont Harris on February 16, 2010. The return included an electronically filed wages and tax statement (Form W-2) purporting income and withheld taxes from Spherion Staffing, Inc.

d. I spoke with Nadine Nicholson, Payroll Tax Supervisor, Spherion Staffing. Ms. Nicholson stated that Dorian Harris did not work Spherion Staffing in 2009. Spherion Staffing

did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Mr. Harris.

e. The income tax return also listed Mr. Harris' home address as 3129 W. Garfield Ave., Milwaukee, WI. As recited in paragraphs 10 and 11 above, defendant Staten resided at 3129 W. Garfield Ave. when the return was filed.

f. Records maintained by the Wisconsin Department of Corrections show that Dorian Harris was incarcerated from February 23, 2009 to May 25, 2009, and January 21, 2010 to April 14, 2011. He was transferred to Fox Lake Correctional Institution on February 2, 2010.

30. Defendant Staten and defendant Coleman worked together to file a fraudulent income tax return under the name of prisoner, **Corey Porter**. Defendant Staten misappropriated an employer identity to create a fraudulent wage and tax statement (Form W-2) supporting the fraudulent income tax return. **COUNT 7**

a. In call no. 1266197106 at minute 5:10 (2/14/10), defendant Coleman passed the telephone receiver to Corey Porter. Mr. Porter spoke directly to defendant Staten. The conversation proceeded as follows.

Coleman: I got another...my other guy here.

Staten: Oh. Goodness gracious.

Coleman: Here you go.

Staten: Goodness.

Porter: How you doing?

Staten: I'm fine.

Porter: What you...

Staten: I just got me nine stack back. I'm trying to buy me...I'm fitting to buy me a Chrysler 300. I got me nine stack.

Porter: I'm saying...I'm saying what can I get? I'm saying what can I...It ain't got to be nothing...It ain't got to be too much.

Staten: Well. I'm going to get you like three or four thousand. And if the IRS accept you like I did one... that dude. He isn't got accepted. Now he isn't got accepted through the IRS.

Porter: Right.

Staten: So, now they just going to look over the paperwork or what. So...see what they owe. 'Cause they can ask for additional information. And they can...or they can...they...they probably not. But most likely if you don't owe, you should be good to go.

Porter: I don't owe nothing. I ain't got no child support. And I ain't got no kids or nothing.

Staten: Well. You should be good to go.

Porter: So what all you need from me?

Staten: Just your name and birthday and social security number on our end. And I just might send you all you all money.

Porter: You might?

Staten: Well, I all got to see you all you all money.

Porter: Well. My name is Corey Porter.

Mr. Porter then spelled out his full name and provided his date of birth and social security number (358-54-****).

Staten: Okay. I'll get you about three or four spot. We get half and half.

Porter: That's cool.

b. WDOR records show an income tax return for tax year 2009 was electronically filed in the name of Cory Porter on February 15, 2010. The return included an electronically filed wages and earnings statement (Form W-2) purporting income and withheld taxes from Preferred Staffing, Inc.

c. I spoke with Bruce Chesshire, General Counsel, Preferred Staffing. Mr. Chesshire stated that Mr. Porter did not work for Preferred Staffing in 2009. Preferred Staffing did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Mr. Porter.

d. The income tax return also listed Mr. Porter's home address as 3129 W. Garfield Ave., Milwaukee, WI. As recited in paragraphs 10 and 11 above, defendant Staten resided at 3129 W. Garfield Ave., Milwaukee, WI when the return was filed.

e. WDOC records show that Corey Porter was incarcerated from January 28, 2008 to April 11, 2011. He was transferred to Fox Lake Correctional Institution on February 2, 2010.

31. Defendant Staten and defendant Coleman worked together to file a fraudulent income tax return under the name of prisoner, **Michael St. Sauver**. Defendant Staten misappropriated an employer identity to create a fraudulent wage and tax statement (Form W-2) supporting the fraudulent income tax return. **COUNT 8**

a. In call no. 1266264198 at minute 6:25 (2/15/10), defendant Coleman passed the telephone receiver to Michael St. Sauver. Mr. St. Sauver spoke to defendant Staten. He spelled out his full name and provided his birthdate and social security number (468-17-****). Mr. St. Sauver and defendant Staten discussed child support that would offset Mr. St. Sauver's income tax refund. Defendant Staten stated that she would submit Mr. St. Sauver's income tax return to the IRS on the following day.

b. WDOR records show an income tax return for tax year 2009 was electronically filed in the name of Michael St. Sauver on February 17, 2010. The return included an electronically filed wages and earnings statement (Form W-2) purporting income and withheld taxes from Preferred Staffing, Inc.

c. I spoke with Bruce Chesshire, General Counsel, Preferred Staffing. Mr. Chesshire stated that Michael St. Sauver did not work Preferred Staffing in 2009. Preferred Staffing did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Mr. St. Sauver.

d. The income tax return also listed Mr. St. Sauver's home address as 3129 W. Garfield Ave., Milwaukee, WI. As recited in paragraphs 10 and 11 above, defendant Staten resided at 3129 W. Garfield Ave., Milwaukee, WI when the return was filed.

e. WDOC records show that Michael St. Sauver was incarcerated from December 12, 2009 to present. He was transferred to Fox Lake Correctional Institution on February 2, 2010.

32. Defendant Staten and defendant Coleman worked together to file a fraudulent income tax return under the name of prisoner, **Michael Evonovich**. Defendant Staten misappropriated an employer identity to create a fraudulent wage and tax statement (Form W-2) supporting the fraudulent income tax return. **COUNT 9**

a. In call no. 1267150824 at minute 11:30 (2/25/10), defendant Coleman passed the telephone receiver to Mr. Evonovich. Mr. Evonovich spoke to defendant Staten. He spelled out his full name and provided his birthdate and social security number (398-86-****). Defendant Staten stated that she would "put it in for you."

b. WDOR records show an income tax return for tax year 2009 was electronically filed in the name of Mr. Evonovich on March 3, 2010. The return included an electronically filed wages and tax statement (Form W-2) purporting income and withheld taxes from Wisconsin Hospitality Group.

c. I spoke with Colleen Zickert, Payroll Manager, Wisconsin Hospitality Group. Ms. Zickert stated that Michael Evonovich did not work Wisconsin Hospitality Group in 2009. Wisconsin Hospitality Group did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Mr. Evonovich.

d. WDOC records show that Mr. Evonovich was incarcerated from October 14, 2009 to November 9, 2010. He was transferred to Fox Lake Correctional Institution on February 8, 2010.

33. Defendant Staten and Defendant Coleman worked together to file a fraudulent income tax return under the name of prisoner **Taurus Bowdry**. Defendant Staten misappropriated an employer identity to create a fraudulent wage and tax statement (Form W-2) supporting the fraudulent income tax return. **COUNT 10**

a. In call no. 1266719105 at minute 2:12 (2/20/10), defendant Coleman told defendant Staten that he has another name. Defendant Coleman spelled out the full name of Taurus Bowdry. Defendant Coleman then passed the telephone receiver to Mr. Bowdry. Mr. Bowdry provided his birthdate and social security number (318-72-****) to defendant Staten.

b. WDOR records show an income tax return for tax year 2009 was electronically filed in the name of Taurus Bowdry February 26, 2010. The return included an electronically filed wages and tax statement (Form W-2) purporting income and withheld taxes from U-Line Corporation.

c. I spoke with Marissa Gasiorowski, Human Resources Administrator, U-Line Corporation. Ms. Gasiorowski advised that Mr. Bowdry did not work for U-Line Corporation in 2009. U-Line Corporation did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Mr. Bowdry.

d. The income tax return also listed Mr. Bowdry's home address as 3129 W. Garfield Ave., Milwaukee, WI. As recited in paragraphs 10 and 11 above, defendant Staten resided at 3129 W. Garfield Ave., Milwaukee, WI when the return was filed

e. WDOC records show Mr. Bowdry was incarcerated from January 9, 2009 to present. He was transferred to Fox Lake Correctional Institution on February 11, 2010.

34. Defendant Staten and defendant Coleman worked together to file a fraudulent income tax return under the name of **Karen Fleeman**. Defendant Staten misappropriated an employer identity to create a fraudulent wage and tax statement (Form W-2) supporting the fraudulent income tax return. **COUNT 11**

a. In call no. 1266719105 at minute 9:40 (2/20/10), defendant Coleman provided the name, date of birth and social security number (376-92-****) for Karen Fleeman. In an aside, defendant Coleman asked Mr. Bowdry about Ms. Fleeman's personal identifying information and tax filing history. Defendant Coleman then explained to defendant Staten that Mr. Bowdry is "on the move too," but that he does not have access to a computer in prison.

b. WDOR records show an income tax return for tax year 2009 was electronically filed in the name of Karen Fleeman on February 26, 2010. The return included an electronically filed wages and earnings statement (Form W-2) purporting income and withheld taxes from Staffworks, Inc.

c. I spoke with Bruce Chesshire, General Counsel, Staffworks, Inc. Mr. Chesshire stated that Ms. Fleeman did not work Staffworks Inc. in 2009. Staffworks, Inc., did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Ms Fleeman.

d. The income tax return also listed Ms. Fleeman's home address as 3129 W. Garfield Ave., Milwaukee, WI. As recited in paragraphs 10 and 11 above, defendant Staten resided at 3129 W. Garfield Ave., Milwaukee, WI when the return was filed.

Fraudulent 2010 income tax returns linked to Fox Lake Correctional scheme

35. The following year of 2011, defendant Staten participated in again filing fraudulent 2010 income tax returns using the identities from Fox Lake Correctional Institution. She again misappropriated employer identities to create fraudulent wage and tax statements (Form W-2) supporting the fraudulent income tax returns.

a. WDOR received an electronically filed 2010 income tax return in the name of **Dorian Harris** on April 4, 2011. The return listed Mr. Harris' home address as 2621 N. 15th Street, Milwaukee, WI. The return further included a wages and tax statement (Form W-2) claiming

income and withheld taxes from Buy Season, Inc. WDOC records show Mr. Harris was incarcerated from January 21, 2010 to April 13, 2011. I spoke with Mead Meaney, Human Resources Manager, Buy Season, Inc. Mr. Meaney stated that Dorian Harris did not work at Buy Season Inc. during 2010. Buy Season Inc. did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) (Form W-2) for Mr. Harris. **COUNT 12**

b. WDOC received an electronically filed 2010 income tax return in the name of **Michael Evonovich** on March 21, 2011. The return listed Mr. Evonovich's home address as 2621 N. 15th Street, Milwaukee, WI. The return further included a wages and tax statement (Form W-2) claiming income and withheld taxes from Seek Careers/Staffing, Inc. WDOC records show Mr. Evonovich was incarcerated from October 14, 2009 to November 9, 2010. I spoke with Lori Stuever, V.P. Human Resources, Seek Careers/Staffing Inc. Ms. Stuever stated that Seek/Careers/Staffing, Inc. did not employ Mr. Evonovich during 2010. Seek Careers/Staffing did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) (Form W-2) for Mr. Evonovich. **COUNT 13**

c. WDOC received an electronically filed 2010 income tax return in the name of **Corey Porter** on January 27, 2011. The return listed Mr. Porter's home address as 3162 N. 1st Street, Milwaukee, WI. The return further included a wages and tax statement (Form W-2) claiming income and withheld taxes from Wisconsin Hospitality Group. I spoke with Colleen Zickert, Payroll Manager, Wisconsin Hospitality Group. Ms. Zickert stated that Mr. Porter did not work at Wisconsin Hospitality Group in 2010. Wisconsin Hospitality Group did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) (Form W-2) for Mr. Porter. **COUNT 14**

d. WDOC received an electronically filed 2010 income tax return in the name of **Karen Fleeman** on January 26, 2011. The return listed Ms. Fleeman's home address as 3347A N. 38th Street, Milwaukee, WI. The return further included a wages and tax statement (Form W-2) claiming income and withheld taxes from Spherion Atlantic Enterprises. I spoke with Nadine Nicholson, Payroll Tax Supervisor, Spherion Atlantic Enterprises. Ms. Nicholson stated that Karen Fleeman did not work at Spherion Atlantic Enterprises in 2010. Spherion Atlantic Enterprises did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) (Form W-2) for Ms. Fleeman. **COUNT 15**

Search warrant on 3347A N. 38th Street, Milwaukee, WI

36. Ninety-one fraudulent income tax returns or fraudulent homestead credit claims list defendant Staten's residence of 3347 N. 38th Street, Milwaukee, WI as the tax filer's home address during June 29, 2011 to October 1, 2013.

37. On May 31, 2012, I participated in the execution of a search warrant on the upper flat of the duplex residence at 3347 N. 38th Street, Milwaukee, WI. Special Agent Mark Banks, Wisconsin Division of Criminal Investigation (WDCI), was the lead law enforcement officer conducting the search. Defendant Staten was physically present in the upper flat when law enforcement officers arrived to execute the search warrant.

38. Law enforcement agents found numerous documents during the search warrant execution showing that defendant Staten controlled the premises at 3347A N. 38th Street, Milwaukee, WI. Agents found current letters, bills, and receipts addressed to defendant Staten at 3347A N. 38th Street, Milwaukee, WI. They also found an automobile title listing defendant Staten's address as 3347A N. 38th Street, Milwaukee, WI.

39. Law enforcement agents found evidence confirming defendant Staten was the person talking to defendant Coleman on the Fox Lake Correctional Institute telephone calls. The agents found an AT&T billing statement to defendant Coleman at 3129 W. Garfield Avenue, Milwaukee, WI dated March 1, 2010 for telephone account number 414-449-3655. They also found Aurora clinic medical records listing defendant Staten's residence as 3129 W. Garfield Ave. during February-March 2010.

40. Law enforcement agents found a WDOR letter addressed to **Artis Batton** at 3347 N. 38th Street, Milwaukee, WI among defendant Staten's possessions. The letter notified Mr. Batton of an income tax refund for tax year 2010. Fraudulent income tax returns were filed using Mr. Batton's identity for tax years 2010 and 2011.

a. WDOR records show a Wisconsin income tax return for tax year 2010 was electronically filed in the name of Artis Batton claiming refund of purportedly withheld taxes. The income tax return and electronic filing data include the following:

Filing date: 7/1/2011;

Tax filer's address: 3347 N. 38th Street, Milwaukee, WI;

Employer: Wal-mart;

Refund payment: \$310.

b. WDOR records show that a Wisconsin income tax return for tax year 2011 was electronically filed in the name of Artis Batton claiming refund of purportedly withheld taxes. The income tax return and electronic filing data include the following:

Filing date: 1/19/2012;

Tax filer's address: 6241 W. Thurston Ave., Milwaukee, WI;

Employer: Wal-mart;

IP address: 184.58.158.162.

c. I spoke with Cari Lynn, Asset Market Protection Manager, Wal-Mart. Ms. Lynn stated that Artis Batton did not work Wal-Mart in 2010 or 2011. Wal-Mart did not give anyone permission to use their entity identifying information to fabricate wages and tax statements (Form W-2) for Mr. Batton. **COUNTS 16 & 17**

41. Law enforcement agents found a scrap of paper bearing handwritten notes for the identity, **Sylvestiana Williams**, among defendant Staten's possessions. The notes included name, date of birth, and social security number. A fraudulent Wisconsin income tax return for tax year 2010 was filed using Ms. Williams identity.

a. WDOR records show that a Wisconsin income tax return for tax year 2010 was electronically filed in the name of Sylvestiana Williams claiming refund of purportedly withheld taxes. The income tax return and electronic filing data include the following:

Filing date: 1/26/2011;

Tax filer's address: 3347 N. 38th Street, Milwaukee, WI;

Employer: Spherion Atlantic Enterprises.

b. I spoke with Nadine Nicholson, Payroll Tax Supervisor, Spherion Atlantic Staffing. Ms. Nicholson stated that Sylvestiana Williams did not work Spherion Atlantic Enterprises in 2010. Spherion Atlantic Staffing did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Ms. Williams. **COUNT 18**

42. Law enforcement agents found a Wisconsin Foodshares card (QUEST card) in the name of **Arthur Gonzalez** among defendant Staten's possessions. Fraudulent income tax returns were filed using Mr. Gonzalez' identity for tax years 2010 and 2011.

a. WDOR records show that a Wisconsin income tax return for tax year 2010 was electronically filed in the name of Arthur Gonzalez claiming refund of purportedly withheld taxes. The income tax return and electronic filing data include the following:

Filing date: 7/29/2011;

Tax filer's address: 3347 N. 38th Street, Milwaukee, WI;

Employer: Wal-mart.

b. I spoke with Cari Lynn, Asset Market Protection Manager, Wal-Mart. Ms. Lynn stated that Arthur Gonzalez did not work for Wal-Mart in 2010. Wal-Mart did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Mr. Gonzalez.

c. WDOR records show that a Wisconsin income tax return for tax year 2011 was electronically filed in the name of Arthur Gonzalez claiming refund of purportedly withheld taxes. The income tax return and electronic filing data include the following:

Filing date: 3/28/2012;

Tax filer's address: 3347A N.38th Street, Milwaukee, WI;

Employer: PA Staffing.

d. I spoke with Lynnè Sheldon, Payroll Accounting Assistant, PA Staffing. Ms. Sheldon stated that Arthur Gonzalez did not work at PA Staffing in 2011. PA Staffing did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Mr. Gonzalez.

43. Law enforcement agents found seven letters from the IRS addressed to tax filers at 3347A N. 38th Street, Milwaukee, WI. Fraudulent Wisconsin income tax returns were filed using these same identities. Those fraudulent returns are described in paragraphs 44-50 below.

44. Law enforcement agents found, among defendant Staten's possessions, an IRS letter addressed to **Reader Pennington** at 3347A N. 38th Street, Milwaukee, WI. Fraudulent Wisconsin income tax returns also were filed under this name for 2010 and 2011.

a. WDOR records show that a Wisconsin income tax return for tax year 2010 was electronically filed in the name of Ms. Pennington claiming refund of purportedly withheld taxes. The income tax return and electronic filing data include the following:

Filing date: 8/22/2011;

Tax filer's address: 2564 N. 38th Street, Milwaukee, WI;

Employer: Wal-Mart;

b. WDOR records show that a Wisconsin income tax return for tax year 2011 was electronically filed in the name of Ms. Pennington claiming refund of purportedly withheld taxes. The income tax return and electronic filing data include the following:

Filing date: 1/20/2012;

Tax filer's address: 3347 N. 38th Street, Milwaukee, WI;

Employer: Wal-Mart;

IP address: 184.58.158.162.

c. I spoke with Cari Lynn, Asset Market Protection Manager, Wal-Mart. Ms. Lynn stated that Reader Pennington did not work for Wal-Mart in 2010 or 2011. Wal-Mart did not give anyone permission to use their entity identifying information to fabricate wages and tax statements (Form W-2) for Ms. Pennington.

d. I interviewed Reader Pennington by telephone. Ms. Pennington stated as follows. She is a resident of Milwaukee. She has been disabled and unable to work for the past several years. She did not file a Wisconsin income tax return for tax year 2010 or 2011. Whoever filed such a return in her name did so without her authority or consent.

45. Law enforcement agents found, among defendant Staten's possessions, an IRS letter addressed to **Frank Bradley, Jr.** at 3347A N. 38th Street, Milwaukee, WI. A fraudulent Wisconsin income tax return also was filed under this name for 2011.

a. WDOR records show that a Wisconsin income tax return for tax year 2011 was electronically filed in the name of Frank Bradley Jr. claiming refund of purportedly withheld taxes. The income tax return and electronic filing data include the following:

Filing date: 4/19/2012;

Tax filer's address: 3347 N. 38th Street, Milwaukee, WI;

Employer: PA Staffing Service.

b. I spoke with Lynn Sheldon, Payroll Accounting Assistant, PA Staffing. Ms. Sheldon stated that Frank Bradley Jr. did not work for PA Staffing in 2011. PA Staffing did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Mr. Bradley.

46. Law enforcement agents found, among defendant Staten's possessions, an IRS letter addressed to **Debra Dunbar** at 3347A N. 38th Street, Milwaukee, WI. Fraudulent Wisconsin income tax returns also were filed under this name for 2010 and 2011.

a. WDOR records show that a Wisconsin income tax return for tax year 2010 was electronically filed in the name of Debra Dunbar claiming refund of purportedly withheld taxes. The income tax return and electronic filing data include the following:

Filing date: 9/12/2011;

Tax filer's address: 2130 N. 18th Street, Milwaukee, WI;

Employer: Wal-Mart.

b. WDOR records show that a Wisconsin income tax return for tax year 2011 was electronically filed in the name of Debra Dunbar claiming refund of purportedly withheld taxes. The income tax return and electronic filing data include the following:

Filing date: 1/23/2012;

Tax filer's address: 3347A N. 38th Street, Milwaukee, WI;

Employer: Wal-Mart;

IP address: 184.58.158.162.

c. I spoke with Cari Lynn, Asset Market Protection Manager, Wal-Mart. Ms. Lynn stated that Debra Dunbar did not work for Wal-Mart in 2010 or 2011. Wal-Mart did not give anyone permission to use their entity identifying information to fabricate wages and tax statements (Form W-2) for Ms. Dunbar.

47. Law enforcement agents found, among defendant Staten's possessions, an IRS letter addressed to **Stacy Scott** at 3347A N. 38th Street, Milwaukee, WI. Fraudulent Wisconsin income tax returns also were filed under this name for 2010 and 2011.

a. WDOR records show that a Wisconsin income tax return for tax year 2010 was electronically filed in the name of Stacy Scott claiming refund of purportedly withheld taxes. The income tax return and electronic filing data include the following:

Filing date: 2/25/2011;

Tax filer's address: 3347 N. 38th Street, Milwaukee, WI;

Employer: Wisconsin Hospitality Group;

Refund payment: \$212.

b. I spoke with Colleen Zickert, Payroll Manager, Wisconsin Hospitality Group. Ms. Zickert stated that Stacy Scott did not work Wisconsin Hospitality Group in 2010. Wisconsin Hospitality Group did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Ms. Scott.

c. WDOR records show that a Wisconsin income tax return for tax year 2011 was electronically filed in the name of Stacy Scott claiming refund of purportedly withheld taxes. The income tax return and electronic filing data include the following:

Filing date: 1/20/2012;

Tax filer's address: 3347 N. 38th Street, Milwaukee, WI, Apt A;

Employer: Wal-mart;

IP address: 184.58.158.162.

d. I spoke with Cari Lynn, Asset Market Protection Manager, Wal-Mart. Ms. Lynn stated that Stacy Scott did not work for Wal-Mart in 2011. Wal-Mart did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Ms. Scott.

48. Law enforcement agents found, among defendant Staten's possessions, an IRS letter addressed to **Bill Nash** at 3347A N. 38th Street, Milwaukee, WI. Fraudulent Wisconsin income tax returns also were filed under this name for 2010 and 2011.

a. WDOR records show that a Wisconsin income tax return for tax year 2010 was electronically filed in the name of Bill Nash claiming refund of purportedly withheld taxes. The income tax return and electronic filing data include the following:

Filing date: 6/6/2011;

Tax filer's address: 6241 W. Thurston Avenue, Milwaukee, WI;

Employer: Wal-Mart;

Refund payment: \$306.

b. WDOR records show that a Wisconsin income tax return for tax year 2011 was electronically filed in the name of Bill Nash claiming refund of purportedly withheld taxes. The income tax return and electronic filing data include the following:

Filing date: 1/19/2012;

Tax filer's address: 3347A N. 38th Street, Milwaukee, WI;

Employer: Wal-Mart;

IP address: 184.58.158.162.

c. I spoke with Cari Lynn, Asset Market Protection Manager, Wal-Mart. Ms. Lynn stated that Bill Nash did not work for Wal-Mart in 2010 or 2011. Wal-Mart did not give anyone permission to use their entity identifying information to fabricate wages and tax statements (Form W-2) for Mr. Nash.

49. Law enforcement agents found, among defendant Staten's possessions, an IRS letter addressed to **Don Dreifke** at 3347A N. 38th Street, Milwaukee, WI. A fraudulent Wisconsin income tax return was filed under this name for 2011.

a. WDOR records show that a Wisconsin income tax return for tax year 2011 was electronically filed in the name of Don Dreifke claiming refund of purportedly withheld taxes. The income tax return and electronic filing data include the following:

Filing date: 1/23/2012;

Tax filer's address: 3347A N. 38th Street, Milwaukee, WI;

Employer: Wal-Mart;

IP address: 184.58.158.162.

b. I spoke with Cari Lynn, Asset Market Protection Manager, Wal-Mart. Ms. Lynn stated that Don Dreifke did not work for Wal-Mart in 2011. Wal-Mart did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Mr. Dreifke.

50. Law enforcement agents found, among defendant Staten's possessions, an IRS letter addressed to **Terry LeFlore** at 3347A N. 38th Street, Milwaukee, WI. A fraudulent Wisconsin income tax return was filed under this name for 2011.

a. WDOR records show that a Wisconsin income tax return for tax year 2011 was electronically filed in the name of Terry LeFlore claiming refund of purportedly withheld taxes. The income tax return and electronic filing data include the following:

Filing date: 4/16/2012;

Tax filer's address: 3347A N. 38th Street, Milwaukee, WI;

Employer: PA Staffing.

b. I spoke with Lynn Sheldon, Payroll Accounting Assistant, PA Staffing. Ms. Sheldon stated that Terry LeFlore's did not work for PA Staffing in 2011. PA Staffing did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Mr. LeFlore.

51. The fraudulent income tax returns described in paragraphs 40-50 above share the following common ties to defendant Staten. All the tax filer identities match notes, benefits cards, IRS letters, or WDOR letters found in defendant Staten's home. Most of the tax returns listed defendant Staten's address of 3347A N. 38th Street, Milwaukee, WI as the tax filer's home address. Many of the income tax returns were filed from an internet protocol address common to defendant Staten's scheme (see paragraphs 77(a)-(c) below). These details, together with the entire facts and circumstances described within this complaint, show that defendant Staten participated in filing these fraudulent income tax returns.

Interview of defendant Staten

52. During the execution of the search warrant on May 31, 2012, Special Agent Banks and I interviewed defendant Staten. Defendant Staten signed an affidavit summarizing the interview. Defendant stated as follows.

a. Defendant Staten understood and waived her *Miranda* rights.

b. Defendant Staten claimed to live at 2667 N. 36th Street, Milwaukee, WI. She had no explanation why she was physically present at 3347A N. 38th Street, Milwaukee, WI.

c. Defendant Staten stated "During early 2010, I got the names of at least three persons from Anthony Coleman while he was at Fox Lake Corrections who were prisoners there. I passed them on to my sister Sharon to do fraudulent tax returns. I was supposed to get half of their refund."

d. Defendant Staten claimed Lakeisha Adams submitted defendant Staten's own income tax return for tax year 2009. Defendant Staten knew the return was fraudulent: "I knew that what she [Ms. Adams] was putting on the return regarding the W-2 form from Custom Staffing Solutions was false and I did this to get back a tax money that I knew I was not entitled to. The main thing that was false was the amounts listed as wages and withholding in the W-2."

e. Defendant Staten stated many of her other family members were also filing fraudulent income tax returns. Those persons included her sisters Sheila Staten and Sharon Staten.

Defendant Staten's 2009 Income Tax return

53. WDOR records show a 2009 income tax return was electronically filed in defendant Staten's name. That return shows as follows.

a. The return was electronically filed on January 15, 2010.

b. Defendant Staten listed her home address as 3129 W. Garfield Avenue, Milwaukee, WI.

c. The return included an electronic wages and tax statement (Form W-2) claiming defendant Staten earned \$12,803 from Custom Staffing Solutions, Inc. and that \$678 were withheld as State of Wisconsin income tax.

d. The return claimed an Earned Income Credit of \$704 based upon two dependent children.

e. The return claimed a total refund of \$1,382 based upon the purported withheld tax payments of \$678 and the Earned Income Credit of \$704.

f. The return requested the refund be directed to defendant Staten's account at Guaranty Bank.

g. Filing data showed the return was electronically sent from a computer with internet protocol number 65.25.179.248.

54. I spoke with Bruce Chesshire, General Counsel, Custom Staffing Solutions. Mr. Chesshire stated that defendant Staten did not work Custom Staffing Solutions in 2009. Custom Staffing Solutions, Inc. did not give anyone permission to use the company's entity

Identifying information to fabricate a wage and tax statement (Form W-2) (Form W-2) for defendant Staten.

55. Guaranty Bank account records for defendant Staten's checking account, obtained by subpoena, show defendant Staten received an electronic transfer from the WDOR on February 1, 2010 for \$1,317.45. This transfer was the adjusted refund payment for defendant Staten's income tax return for tax year 2009.

56. As recited in paragraph 52(d) above, defendant Staten admitted her 2009 income tax return was fraudulent. Defendant Staten misappropriated an employer identity to create a fraudulent wage and tax statement (Form W-2) supporting her fraudulent income tax return.
COUNT 19

Traffic stop of defendant Staten in East Troy, WI

57. I reviewed official reports of the East Troy Police Department concerning a traffic stop of defendant Staten on November 12, 2012. The reports are of a type that I have relied upon in the past and found to be truthful and accurate. The reports state as follows.

a. On November 12, 2012, Officer Jeff Price stopped an automobile travelling on Interstate Highway 43 in East Troy, WI. Defendant Coleman was the driver. Defendant Staten was a passenger.

b. Officer Price searched defendant Staten's purse. Officer Price found \$3,751 in cash, various Foodshares (Quest) cards in other persons' names, and handwritten notes of several persons' dates of birth and social security numbers. Defendant Staten told Officer Price that the purse and cash were hers.

58. The Foodshares (Quest) cards in defendant Staten's purse were in the names of Karen Fleeman, Tyrone Williams, and Gregory Matthews. WDOR records show fraudulent income tax returns were filed under each of these the identities.

a. As described in paragraphs 34 and 35(d) above, fraudulent 2009 and 2010 income tax returns were filed in the name of **Karen Fleeman**.

b. A fraudulent income tax return for tax year 2010 was filed in the name of **Tyrone Williams** listing his employer as Wal-Mart Associates, Inc. and claiming refund of purportedly withheld taxes. Cari Lynn, Asset Market Protection Manager, Wal-Mart stated that Tyrone Williams did not work for Wal-Mart in 2010. A fraudulent homestead credit claim for tax year 2010 was filed listing Mr. Williams' home address as 3347A N. 38th Street, Milwaukee, WI.

c. A fraudulent income tax return for tax year 2010 was filed in the name of **Gregory Matthews** listing his employer as Wal-Mart, Inc. and claiming refund of purportedly withheld taxes. Cari Lynn, Asset Market Protection Manager, Wal-Mart, stated that Gregory Matthews did not work for Wal-Mart in 2010. WDOR paid a refund of \$196 on the return.

59. The notes in defendant Staten's purse had the names, social security numbers, and dates of birth of the following persons: Terence Griffin, Sylvester Johnson, Charles McDaniels, Vincent Edwards, Sylvester Sutton, and Denzel Rivers. WDOR records show fraudulent income tax returns were filed under each of these identities.

60. Fraudulent 2010 and 2011 income tax returns were filed using the identity of **Terence Griffin** as listed in the notes in defendant Staten's purse.

a. Records maintained by the Mississippi Department of Corrections shows the above Terence Griffin commenced a sentence of fifteen years imprisonment on November 3, 2008.

b. WDOR records show a fraudulent income tax return for tax year 2011 was filed using Mr. Griffin's identity claiming refund of purportedly withheld taxes. The return and filing data contained the following information:

Filing date: 1/19/2012;

Tax filer's address: 3347A N. 38th Street, Milwaukee, WI;

Employer: Wal-mart ;

IP address: 184.58.158.162.

c. WDOR records show a fraudulent income tax return for tax year 2010 was also filed using Mr. Griffin's identity claiming refund of purportedly withheld taxes. The return and filing data contained the following information:

Filing date: 10/3/2011;

Tax filer's address: 4229 W. Beethoven Place, Milwaukee, WI;

Employer: Wal-mart;

IP address: 184.58.157.199.

d. The above internet protocol address 184.58.157.199 used to electronically file Mr. Griffin's 2010 income tax return was assigned to defendant Staten at 3347 N. 38th Street, Milwaukee, WI. See paragraph 68 below.

e. I spoke with Cari Lynn, Asset Market Protection Manager, Wal-Mart. Ms. Lynn stated that Terence Griffin did not work for Wal-Mart in 2010 or 2011. Wal-Mart did not give anyone permission to use their entity identifying information to fabricate wages and tax statements (Form W-2) for Mr. Griffin. **COUNTS 20 & 21**

61. Fraudulent 2010 and 2011 income tax returns were filed using the identity of **Sylvester Johnson** as listed in the notes in defendant Staten's purse.

a. Records maintained by the Mississippi Department of Corrections show the above Sylvester Johnson commenced a sentence of twenty years imprisonment on November 26, 2006.

b. WDOR records show a fraudulent income tax return for tax year 2011 was filed using Mr. Johnson's identity claiming refund of purportedly withheld taxes. The return and filing data contained the following information:

Filing date: 1/20/2012;

Tax filer's address: 4229 W. Beethoven Place, Milwaukee, WI;

Employer: Wal-mart;

IP address: 184.58.158.162.

c. WDOR records show a fraudulent income tax return for tax year 2010 was filed using Mr. Johnson's identity claiming refund of purportedly withheld taxes. The return and filing data contained the following information:

Filing date: 10/3/2011;

Tax filer's address: 4229 W. Beethoven Place, Milwaukee, WI;

Employer: Wal-mart;

IP address: 184.58.157.199.

d. The above internet protocol address 184.58.157.199 used to electronically file Mr. Johnson's 2010 income tax return was assigned to defendant Staten at 3347 N. 38th Street, Milwaukee, WI. See paragraph 68 below.

e. I spoke with Cari Lynn, Asset Market Protection Manager, Wal-Mart. Ms. Lynn stated that Sylvester Johnson did not work for Wal-Mart in 2010 or 2011. Wal-Mart did not give anyone permission to use their entity identifying information to fabricate wages and tax statements (Form W-2) for Mr. Johnson. **COUNTS 22 & 23**

62. Fraudulent 2010 and 2011 income tax returns were filed using the identity of **Charles McDaniels** as listed in the notes in defendant Staten's purse.

a. WDOC shows the above Charles McDaniels was incarcerated at Dodge County Correctional Institution when the below 2011 income tax return was filed in his name on January 19, 2012.

b. WDOR records show a fraudulent income tax return for tax year 2011 was filed using Mr. McDaniels' identity claiming refund of purportedly withheld taxes. The return and filing data contained the following information:

Filing date: 1/19/2012;

Tax filer's address: 3347A N. 38th Street, Milwaukee, WI;

Employer: Wal-mart;

IP address: 184.58.158.162.

c. WDOR records show a fraudulent income tax return for tax year 2010 was also filed using Mr. McDaniels' identity claiming refund of purportedly withheld taxes. The return and filing data contained the following information:

Filing date: 7/7/2011;

Tax filer's address: 3347A N. 38th Street, Milwaukee, WI;

Employer: Wal-mart.

d. I spoke with Cari Lynn, Asset Market Protection Manager, Wal-Mart. Ms. Lynn stated that Charles McDaniels did not work for Wal-Mart in 2010 or 2011. Wal-Mart did not give anyone permission to use their entity identifying information to fabricate wages and tax statements (Form W-2) for Mr. McDaniels. **COUNTS 24 & 25**

63. Fraudulent 2010 and 2011 income tax returns were filed using the identity of **Vincent Edwards** as listed in the notes in defendant Staten's purse.

a. WDOC shows the above Vincent Edwards was incarcerated during the majority of 2010.

b. WDOR records show a fraudulent income tax return for tax year 2011 was filed using Mr. Edwards' identity claiming refund of purportedly withheld taxes. The return and filing data contained the following information:

Filing date: 1/19/2012;

Tax filer's address: 6241 W. Thurston Ave., Milwaukee, WI;

Employer: Wal-mart;

IP address: 184.58.158.162.

c. WDOR records show a fraudulent income tax return for tax year 2010 was also filed using Mr. Edwards' identity claiming refund of purportedly withheld taxes. The return and filing data contained the following information:

Filing date: 9/12/2011;

Tax filer's address: 3347A N. 38th Street, Milwaukee, WI;

Employer: Wal-mart.

d. I spoke with Cari Lynn, Asset Market Protection Manager, Wal-Mart. Ms. Lynn stated that Vincent Edwards did not work for Wal-Mart in 2010 or 2011. Wal-Mart did not give anyone permission to use their entity identifying information to fabricate wages and tax statements (Form W-2) for Mr. Edwards. **COUNTS 26 & 27**

64. A fraudulent 2011 income tax return was filed using the identity of **Sylvester Sutton** as listed in the notes in defendant Staten's purse.

a. WDOR records show a fraudulent income tax return for tax year 2011 was filed using Mr. Sutton's identity claiming refund of purportedly withheld taxes. The return and filing data contained the following information:

Filing date: 1/23/2012;

Tax filer's address: 3347A N. 38th Street, Milwaukee, WI;

Employer: Wal-mart;

IP address: 184.58.158.162.

b. I spoke with Cari Lynn, Asset Market Protection Manager, Wal-Mart. Ms. Lynn stated that Sylvester Sutton did not work for Wal-Mart in 2011. Wal-Mart did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Mr. Sutton. **COUNT 28**

65. Fraudulent 2010 and 2011 income tax returns were filed using the identity of **Denzel Rivers** as listed in the notes in defendant Staten's purse.

a. WDOC shows the above Denzel Rivers was incarcerated from January 25, 2011 to September 14, 2012.

b. WDOR records show a fraudulent income tax return for tax year 2011 was filed using Mr. Rivers' identity claiming refund of purportedly withheld taxes. The return and filing data contained the following information:

Filing date: 1/19/2012;

Tax filer's address: 2829 N. 55th Street, Milwaukee, WI;

Employer: Capitol Foods;

Internet protocol address: 184.58.146.146.

c. The above internet protocol address 184.58.146.146 was assigned to customer Annie Staten, 2902 N. 36th Street, Milwaukee, WI. Annie Staten is mother of defendant Staten. See paragraph 74 below.

d. I spoke with Kozat Martin, Human Resource Manager, Capitol Foods. Ms. Martin stated that Denzel Rivers did not work for Capitol Foods in 2011. Capitol Foods did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Mr. Rivers. **COUNT 29**

e. WDOR records show a fraudulent income tax return for tax year 2010 was also filed using Mr. Rivers' identity claiming refund of purportedly withheld taxes. The return and filing data contained the following information:

Filing date: 7/25/2011;

Tax filer's address: 2564 N. 11th Street, Milwaukee, WI;

Employer: Wal-mart.

f. I spoke with Cari Lynn, Asset Market Protection Manager, Wal-Mart. Ms. Lynn stated that Denzel Rivers did not work for Wal-Mart 2010. Wal-Mart did not give anyone permission to use their entity identifying information to fabricate a wages and tax statement (Form W-2) for Mr. Rivers. **COUNT 30**

66. The fraudulent income tax returns described in paragraph 58 to 65 above share the following common ties to defendant Staten. All the tax filer identities were on a scrap paper or identity cards from defendant Staten's purse. Most of the 2011 tax returns listed defendant Staten's address of 3347A N. 38th Street, Milwaukee, WI as the tax filer's home address. Two of the 2010 fraudulent tax returns (Terence Griffin and Sylvester Johnson) were filed via defendant Staten's internet protocol number. These details, together with the entire facts and circumstances described within this complaint, show that defendant Staten participated in filing these fraudulent income tax returns.

Internet protocol address evidence

67. An internet protocol (IP) address is a unique number that identifies a customer accessing the internet. Internet service providers preserve, for several months, records of internet protocol address assignments. These records show what customer used what internet protocol address on a given date and time. When WDOR electronically receives an income tax return via the internet, WDOR records the internet protocol address of the computer submitting the income tax return.

68. I obtained, by subpoena, Time Warner Cable records for internet customer, defendant Staten. Those records show as follows:

Customer name: Angela Staten;

Service address: 3347A N. 38th Street, Milwaukee, WI;

Phone: 414-444-8377;

Service dates: 9/15/2011 to 11/30/2011;

Internet Protocol addresses: 184.58.145.209; 184.58.154.222; 184.58.157.199;
184.58.157.41.

Internet protocol address records were unavailable for service prior to September 15, 2011.

69. All of the above internet protocol addresses were simultaneously assigned to defendant Staten throughout the service date range of 9/15/2011 to 11/30/2011. Multiple internet protocol addresses may apply when multiple computerized devices (e.g., a television accessing Netflix online service, a desk top computer, an X-Box online gaming device, etc.) are routed through the same home internet access line.

70. WDOR records show the 2010 fraudulent income tax returns, under the identities **Terence Griffin** (paragraph 60(c) above) and **Sylvester Johnson** (paragraph 61(c) above) were filed on October 3, 2011 using defendant Staten's internet protocol address 184.58.157.199.

71. Defendant Staten participated in filing a fraudulent 2010 income tax return in the name of defendant **Antonio Robinson** claiming refund of purportedly withheld taxes. WDOR records show the return was filed via defendant Staten's internet protocol address 184.58.157.41 on September 20, 2011. The return includes an electronic wages and tax statement (Form W-2) claiming Mr. Robinson was employed by Wal-Mart. I spoke with Cari Lynn, Asset Market Protection Manager, Wal-Mart. Ms. Lynn stated that Antonio Robinson did not work for Wal-

Mart in 2010. Defendant Staten misappropriated this employer's identity to create a fraudulent wage and tax statement (Form W-2) supporting the fraudulent income tax return. **COUNT 31**

72. Defendant Staten participated in filing a fraudulent 2010 income tax return in the name of **Majido Franklin** claiming refund of purportedly withheld taxes. WDOR records show the return was filed on October 3, 2011 via defendant Staten's internet protocol address 184.58.145.209. The return includes an electronic wages and tax statement (Form W-2) claiming Majido Franklin was employed by Wal-Mart. I spoke with Cari Lynn, Asset Market Protection Manager, Wal-Mart. Ms. Lynn stated that Majido Franklin did not work for Wal-Mart in 2010. Defendant Staten misappropriated this employer's identity to create a fraudulent wage and tax statement (Form W-2) supporting the fraudulent income tax return. **COUNT 32**

73. Defendant Staten participated in filing a fraudulent 2010 income tax return in the name of **Davenote Bell** claiming refund of purportedly withheld taxes. WDOR records show the return was filed on October 17, 2011 via defendant Staten's internet protocol address 184.58.154.222. The return includes an electronic wages and earnings statement (Form W-2) claiming Mr. Bell was employed by Wal-Mmart Associates, Inc. I spoke with Cari Lynn, Asset Market Protection Manager, Wal-Mart. Ms. Lynn stated that Davenote Bell did not work for Wal-Mart in 2010. Defendant Staten misappropriated this employer's identity to create a fraudulent wage and tax statement (Form W-2) supporting the fraudulent income tax return. **COUNT 33**

74. I obtained, by subpoena, Time Warner Cable records for internet customer Annie Staten. Annie Staten is the mother of defendant Staten. Those records show as follows:

Customer name: Annie Staten;

Service address: 2902 N. 36th Street, Milwaukee, WI;

Phone: 414-988-5741;

Service dates: 3/16/2010 to 12/22/2011;

IP address: 184.58.146.146.

75. East Troy Police arrested defendant Staten with a scrap paper note of the identifying information of **Denzel Rivers**. A fraudulent 2011 income tax return was filed under that identity on January 19, 2012. See paragraph 65 above. That fraudulent income tax return was filed via Annie Staten's internet protocol address 184.58.146.146.

76. WDOR records show fraudulent income tax returns were similarly filed for tax years 2010 via Annie Staten's internet protocol address 184.58.146.146. The returns were filed under the following names: **Aliciona Brumfield; Lillie Clark; Christopher Davis; Jarvis Jackson; Harold Johnson; Corey McThune.**

77. More than 70 fraudulent income tax returns were filed with WDOR via an internet protocol address (184.58.158.162) that defendant Staten was using.

a. As recited in paragraphs 40-50 above, law enforcement agents found IRS and WDOR letters addressed to several different names at 3347A N. 38th Street, Milwaukee, WI. Six fraudulent income tax returns were filed, in those names, via internet protocol address 184.58.158.162 in January 2012.

b. As recited in paragraph 59 above, law enforcement agents seized, from defendant Staten's purse, personal identifying information for the following names: Terence Griffin, Sylvester Johnson, Charles McDaniels, Vincent Edwards, and Sylvester Sutton. Fraudulent income tax returns were filed in all five of these names via internet protocol address 184.58.158.162 in January 2012.

c. WDOR records show, that in addition to the above income tax returns, 61 other fraudulent income tax returns were filed via internet protocol address 184.58.158.162 in January 2012. Most of the fraudulent returns also listed the tax filer's home as defendant Staten's address of 3347 N. 38th Street, Milwaukee, WI.

Fraudulent homestead credit claims filed using defendant Staten's address

78. Defendant Staten filed numerous fraudulent homestead credit claims with WDOR using her home address of 3347A N. 38th Street, Milwaukee, WI as the claimant's home address. WDMV records show defendant Staten lived at this address from June 29, 2011 through October 1, 2013. See paragraph 10 above. The fraudulent claims were filed on paper forms via U.S. mail. The paper forms appear to have been completed in defendant Staten's distinctive handwriting. WDOR paid the claims by checks mailed to the defendant Staten's home address.

79. Handwriting evidence shows defendant Staten wrote the fraudulent homestead credit claims listed in paragraph 80-86 below.

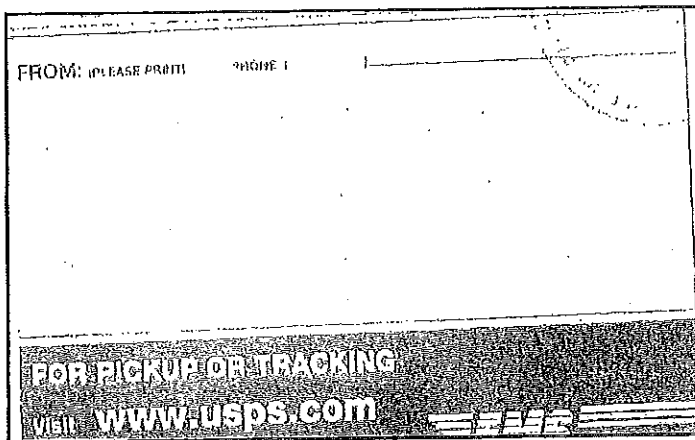
a. Under section 909.015(3), Wis. Stats., a jury may determine authorship through its own lay comparison of handwriting.

b. The 2011 homestead credit claims in paragraphs 80-86 below were all filled out in a similar handwriting style. The below excerpt from the 2011 homestead credit claim in the name of Tyrone Williams is an example.

Claimant's legal last name Williams	Legal first name Tyrone	M.I.	at the end
Spouse's legal last name	Spouse's legal first name	M.I.	City, village or town
Home address (number and street) 3347A North 38th street		Apt. no.	County of
City or post office Milwaukee	State WIS	Zip code 53216	Special condition

1 a What was your age as of December 31, 2010? (If you were under 18, you do not qualify for homestead)

c. The handwriting on the Tyrone Williams homestead credit claim form matches known handwriting of defendant Staten. Police seized a U.S. Postal Service express mail receipt from defendant Staten's home. The receipt includes the below handwriting of the sender, defendant Staten.



80. WDOR records show a fraudulent homestead credit claim was filed on March 18, 2011 in the name of **Yolanda Mabra**. **COUNT 34**

a. The homestead credit claim is completed in defendant Staten's distinctive handwriting.

b. The homestead credit claim listed Ms. Mabra's address as 3347A N. 38th Street, Milwaukee, WI.

c. The claim included a rent certificate purporting that Ms. Mabra had paid \$550 rent per month throughout 2010 to occupy the premises at 3066 N. 38th Street, Milwaukee, WI. A signature in the name of purported landlord, Irene Moore, appears on the Rent Certificate.

d. WDOR approved the claim and mailed a check for \$868 to Ms. Mabra at 3347A. N 38th Street, Milwaukee, WI.

e. On September 12, 2014, I spoke by telephone with adult citizen, Irene Moore. Ms. Moore stated as follows. Ms. Moore has lived at 3066 N. 38th Street for more than forty years. She has never rented to Yolanda Mabry. Ms. Moore does not know Ms. Mabry. The signature in Ms. Moore's name on the Rent Certificate is a forgery.

81. WDOR records show a fraudulent homestead credit claim was filed on March 23, 2011 in the name of **Rafael Thomas**. **COUNT 35**

a. The homestead credit claim is completed in defendant Staten's distinctive handwriting.

b. The homestead credit claim listed Mr. Thomas' address as 3347A N. 38th Street, Milwaukee, WI.

c. The claim included a rent certificate purporting that Mr. Thomas had paid \$550 rent per month throughout 2010 to occupy the premises at 3347A. N. 38th Street, Milwaukee, WI.

d. WDOR approved the claim and mailed a check for \$1,036 to Mr. Thomas at 3347A. N 38th Street, Milwaukee, WI.

e. On August 22, 2014, I interviewed Mr. Thomas in person. Mr. Thomas stated that he did not file the above homestead credit claim, did not receive the payment, and never lived at 3347A N. 38th Street, Milwaukee, WI. Mr. Thomas stated that he was the victim of identity theft.

82. WDOR records show a fraudulent homestead credit claim was filed on June 16, 2011 in the name of **Tyrone Williams**. **COUNT 36**

a. The homestead credit claim is completed in defendant Staten's distinctive handwriting.

b. The homestead credit claim listed Mr. Williams' address as 3347A N. 38th Street, Milwaukee, WI.

c. The claim included a rent certificate purporting that Mr. Williams had paid \$500 rent per month throughout 2010 to occupy the premises at 2130A. N. 18th Street, Milwaukee, WI. A signature in the name of purported landlord, Kim Robinson, appears on the Rent Certificate.

d. WDOR approved the claim and mailed a check dated July 5, 2011 for \$1,028 to Mr. Williams at 3347A. N. 38th Street, Milwaukee, WI.

e. I contacted the purported landlord, Kim Robinson. Mr. Robinson stated that he never rented the property at 2130A. N. 18th Street to Mr. Williams. The signature on the above Rent Certificate in Mr. Robinson's name is a forgery.

83. WDOR records show a fraudulent homestead credit claim was filed on April 18, 2011 in the name of **Freddie McDougal**. **COUNT 37**

a. The homestead credit claim is completed in defendant Staten's distinctive handwriting.

b. The homestead credit claim listed Mr. McDougal's address as 3347A N. 38th Street, Milwaukee, WI.

c. The claim included a rent certificate purporting that Mr. McDougal had paid \$650 rent per month throughout 2010 to occupy the premises at 3824. N. 39th Street, Milwaukee, WI. A signature in the name of purported landlord, Rosa Slater, appears on the Rent Certificate.

d. WDOR approved the claim and mailed a check dated May 26, 2011 for \$1,012 to Mr. McDougal at 3347A. N. 38th Street, Milwaukee, WI.

e. I contacted the purported landlord, Rosa Slater. Ms. Slater stated that she never rented the property at 3824. N. 39th Street to Mr. McDougal. The signature on the above Rent Certificate in her Ms. Slater's name is a forgery.

84. WDOR records show a fraudulent homestead credit claim was filed on March 21, 2011 in the name of **Betty Johnson**. **COUNT 38**

a. The homestead credit claim is completed in defendant Staten's distinctive handwriting.

b. The homestead credit claim listed Ms. Johnson's address as 3347A N. 38th Street, Milwaukee, WI.

c. The claim included a rent certificate purporting that Ms. Johnson had paid \$550 rent per month throughout 2010 to occupy unspecified premises. A signature in the name of purported landlord, Nancy Jackson, appears on the Rent Certificate.

d. WDOR approved the claim and mailed a check dated March 25, 2011 for \$892 to Ms. Johnson at 3347A N 38th Street, Milwaukee, WI.

e. I contacted the purported landlord, Nancy Mustafa (FKA Nancy Jackson). Ms. Mustafa stated that she never rented any property to Ms. Johnson. The signature on the above Rent Certificate in the name "Nancy Jackson" is a forgery.

85. WDOR records show a fraudulent homestead credit claim was filed on June 9, 2011 in the name of **Marshall Marfitt. COUNT 39**

a. The homestead credit claim is completed in defendant Staten's distinctive handwriting.

b. The homestead credit claim listed Ms. Marfitt's address as 3347A N, 38th Street, Milwaukee, WI.

c. The claim included a rent certificate purporting that Mr. Marfitt had paid \$500 rent per month throughout 2010 to occupy the premises at 2130 N, 18th Street, Milwaukee, WI. A signature in the name of purported landlord, Kim Robinson, appears on the Rent Certificate.

d. WDOR approved the claim for \$1,108 to Mr. Marfitt at 3347A N 38th Street, Milwaukee, WI. The State of Wisconsin redirected the refund to apply to Mr. Marfitt's unpaid obligations in Winnebago County.

e. I contacted the purported landlord, Kim Robinson. Mr. Robinson stated that he never rented the property at 2130 N, 18th Street to Mr. Marfitt. The signature on the above Rent Certificate in Mr. Robinson's name is a forgery.

86. WDOR records show a fraudulent homestead credit claim was filed on March 18, 2011 in the name of **Megan Postma. COUNT 40**

a. The homestead credit claim is completed in defendant Staten's distinctive handwriting.

b. The homestead credit claim listed Ms. Postma's address as 3347A N, 38th Street, Milwaukee, WI.

c. The claim included a rent certificate purporting that Ms. Postma had paid \$550 rent per month throughout 2010 to occupy the premises at 3054 S, 15th Place, Milwaukee, WI. A signature in the name of purported landlord, Artemio Callejas, appears on the Rent Certificate.

d. WDOR approved the claim and mailed a check dated March 29, 2011 for \$884 to Ms. Postma at 3347A N, 38th Street, Milwaukee, WI.

e. I contacted the purported landlord, Artemio Callejas. Mr. Callejas stated that he never rented the property at 3054 S, 15th Place to Ms. Postma. The signature on the above Rent Certificate in Mr. Callejas' name is a forgery.

87. WDOR records show fraudulent 2010 homestead credit claims in the names of **Christine Rodgers, Laura Brunner, and Jamie Rodee** were also filed and paid with 3347 N. 38th Street as the home address. The handwriting on these homestead credit claim forms appears to be that of some other person than defendant Staten.

88. WDOR records show more 2011 homestead credit claims were filed, but denied, using defendant Staten's address 3347A N. 38th Street, Milwaukee, WI as the claimants' purported home address. Those claims were filed in the following names: **Devine Burt** (filed on 5/8/2012); **Larry Harris** (filed on 3/26/2012); **Don Haskins** (filed on 5/8/2012); **Natasha King** (filed on 5/8/2012); **Andrew Sanders** (filed on 5/8/2012).

Citizen witness statements

89. On December 8, 2011, I interviewed adult citizen, Terrance Stokes. Mr. Stokes stated as follows. Mr. Stokes is nephew of defendant Anthony Coleman. Defendant Staten is the girlfriend of defendant Coleman. Defendant Staten lives at 3347A N. 38th Street, Milwaukee, WI. Defendant Staten has been electronically filing fraudulent income tax returns for approximately three years. Many of defendant Staten's sisters are also engaged in the fraud scheme. Defendant Staten asked Mr. Stokes to obtain other persons' identifying information to file fraudulent income tax returns in their names. She promised to give half the fraud profits to Mr. Stokes. Defendant Staten has a connection who obtains identities of prisoners in the Mississippi prison system. Defendant Staten files fraudulent income tax returns under these identities. Mr. Stokes has seen defendant Staten electronically filing income tax returns on her own computer and on other persons' computers. Defendant Staten receives her fraudulent income tax refunds on Green Dot and Net Spend prepaid debit cards. Mr. Stokes heard defendant Staten say that she would never be caught for income tax return fraud because "I am too slick for them."

90. On August 25, 2011 and April 18, 2012, I interviewed adult citizen, Lena Adams. Ms. Adams stated as follows. Ms. Adams is the aunt of defendant Staten and Sharon Staten. Four of the Staten sisters are involved in income tax refund fraud. Those sisters are defendant Staten, Sharon Staten, Shilda Staten, and Tawanda Staten. The Staten sisters work together on the fraud scheme. They file fraudulent income tax returns using the identities of Mississippi prison inmates. The Staten sisters have been engaged in the tax fraud scheme since 2000.

91. On September 1, 2011, I interviewed adult citizen, Candie Staten. She stated as follows. She is a cousin of defendant Staten. Defendant Staten is involved in income tax return fraud and Foodshares program fraud. Defendant Staten files fraudulent income tax returns using the identities of Mississippi prison inmates.

Conspiracy

92. Defendant Staten and defendant Coleman conspired to obtain and use identities of Fox Lake Correctional Institute inmates to file fraudulent income tax returns. The conspiracy is explicitly evidenced by the above prison telephone calls between defendant Staten and defendant Coleman.

93. Defendant Staten and her sisters shared employer identifying information for the purpose of fabricating wage and tax statements (Forms W-2). WDCI agents searched the homes of Tawanda Staten and Sharon Staten on May 31, 2012. Both homes contained identifying information notes for the following employers: PA Staffing, Inc., Capitol Food, Seek

Careers/Staffing Inc., and Wal-Mart. Both Defendant Staten and Tawanda Staten used these same employer identities when filing fraudulent income tax returns.

94. Defendant Staten and her sisters shared personal identifying information for the purpose of filing fraudulent income tax returns and fraudulent homestead credit claims. Defendant Staten provided prisoner identities, from her Fox Lake Correctional Institute scheme, to Sharon Staten. WDCI agents found notebooks and scrap notes listing the names, dates of birth, and social security numbers of hundreds of persons in Sharon Staten's home. These identities included Fox Lake Correctional Institute prisoners Dorian Harris, Corey Porter, and Michael Evonovich.

95. Defendant Staten and her sisters shared a common source who provided identities of Mississippi state prison inmates for the tax fraud scheme.

a. Lena Adams and Terrence Stokes both stated that a contact in Mississippi gives prisoner identities to the Staten sisters.

b. Defendant Staten filed fraudulent income tax returns using the identities of Mississippi prison inmates Terrence Griffin and Sylvester Johnson.

c. Tawanda Staten filed a homestead credit claim using the identity of Mississippi prison inmate Derrick Stapleton. The claim form is filled out in Tawanda Staten's distinctive handwriting. The homestead credit check, payable to Mr. Stapleton, bears the endorsement signature of Tawanda Staten. WDCI agents also found scrap notes listing Mr. Stapleton's name, date of birth, and social security number in Tawanda Staten's home.

d. Sharon Staten filed a fraudulent income tax return using the identity of Mississippi prison inmate Jeremy Faulkner. The return was filed on June 20, 2011. On May 31, 2012, WDCI agents found scrap notes listing Mr. Faulkner's name, date of birth, and social security number in Sharon Staten's home.

96. Defendant Staten and her sisters shared their expertise in committing income tax fraud.

a. In several of the Fox Lake Correctional Institution telephone calls, defendant Staten stated that she was receiving help from her sisters in filing fraudulent income tax returns.

b. In her interview on May 31, 2012, defendant Staten stated her sister, Sheila Staten, helps her file fraudulent income tax returns.

c. Ms. Adams and Mr. Stokes both state that defendant Staten jointly commits tax fraud with Tawanda Staten and Sharon Staten.

Total fraud loss to State of Wisconsin

97. 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.

98. As described above, circumstantial and direct evidence specifically links defendant Angela Staten to more than 225 fraudulent income tax returns and fraudulent homestead credit claims. Those fraudulent returns and claims resulted in fraud losses far in excess of \$10,000.

99. 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 E. Wisconsin Avenue, Milwaukee, WI.

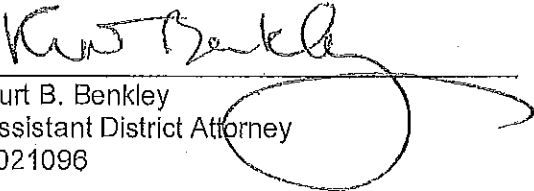
Habitual criminality

100. Official records that the Clerk, Milwaukee County Circuit Court, maintains for *State v. Angela Staten, Case No. 2006CF002354*, show defendant Staten was convicted of the three misdemeanor offenses on August 11, 2006. Official records that the Clerk, Sheboygan County Circuit Court, maintains for *State v. Angela Staten, Case No. 2009CF000728*, show defendant Staten was convicted of the felony offense of Failure to Report to County Jail on February 9, 2010. Those convictions remain unreversed and a matter of record, and render defendant Staten an habitual criminal within the definition of section 939.62, Wisconsin Stats. Certified copies of the judgments of conviction are attached and incorporated herein by reference.

101. Official records that the Clerk, Milwaukee County Circuit Court, maintains for *State v. Anthony Coleman, Case No. 2005CF005168* show defendant Coleman was convicted of the felony offense of substantial battery on May 31, 2006. The conviction remains unreversed and a matter of record, and renders defendant Coleman an habitual criminal within the definition of section 939.62, Wisconsin Stats. A certified copy of the judgment of conviction is 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