

STATE OF WISCONSIN CIRCUIT COURT RACINE COUNTY

STATE OF WISCONSIN
 Plaintiff,

DA Case No.: 2017RA005348
Court Case No.: 2018CF

vs.

THEODORE L LIGHTFIELD
424 Donald Drive
Burlington, WI 53105

CRIMINAL COMPLAINT

DOB: 03/06/1983
Sex/Race: M/W
Eye Color: Brown
Hair Color: Brown
Height: 5 ft 6 in
Weight: 152 lbs

Defendant.

For Official Use

Status: Summons for March 08, 2018 at 1:30 PM
Officer: Michael Austin, of the WI Dept of Revenue

The defendant did:

Count 1: FRAUD/RENDERING INCOME TAX RETURN OR OBTAIN REFUND WITH FRAUDULENT INTENT

The above-named defendant on or about Wednesday, January 28, 2015, in the City of Burlington, Racine County, Wisconsin, contrary to sec. 71.83(2)(b)1, 939.50(3)(h) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

Count 2: FRAUD/RENDERING INCOME TAX RETURN OR OBTAIN REFUND WITH FRAUDULENT INTENT

The above-named defendant on or about Tuesday, February 02, 2016, in the City of Burlington, Racine County, Wisconsin, contrary to sec. 71.83(2)(b)1, 939.50(3)(h) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

Count 3: FRAUD/RENDERING INCOME TAX RETURN OR OBTAIN REFUND WITH FRAUDULENT INTENT

The above-named defendant on or about Thursday, February 16, 2017, in the City of Burlington, Racine County, Wisconsin, contrary to sec. 71.83(2)(b)1, 939.50(3)(h) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

The official records and files of the Racine County District Attorney's Office, the Wisconsin Department of Justice and/or Department of Transportation reflect that the defendant has the following record of convictions:

- 02/12/2000 - 03/22/2000 OWI-1st Walworth Co. Z494899-6
- 05/01/2001 - 07/10/2001 OWI-2nd Racine Co. 01CT705
- 03/21/2005 - 09/27/2005 OWI-3rd Racine Co. 05CT775

The complainant, being first duly sworn on oath, on information and belief, alleges and states that in the County of Racine, State of Wisconsin, the defendant did commit the above described offense(s) and prays that said defendant be dealt with according to the laws of the State of Wisconsin.

The complainant states that he is an adult citizen and has reviewed the official law enforcement reports prepared under the above mentioned complaint numbers by the above stated officer, whose reports your complainant relies upon as truthful and accurate inasmuch as they were prepared during the course of an official law enforcement investigation. The complainant relies upon the statements of the mentioned witnesses inasmuch as they are citizens and their statements are based on personal knowledge or eyewitness observations; the complainant relies upon the statements of the defendant, if any, inasmuch as they are contrary to the defendant's penal interests and are, therefore, to be believed.

The complainant thereby informs the court that the basis for the above charges is as follows:

Agent Austin of the Wisconsin Department of Revenue reports that on March 15, 2017, an internal referral was made to the Office of Criminal Investigations regarding the tax returns of Theodore Lightfield, residing at 424 Donald Drive, Burlington, County of Racine, State of Wisconsin, for fraudulently inflating his State of Wisconsin withholding on his tax returns. On April 17, 2017, Agent Austin interviewed Lightfield who admitted to intentionally inflating his State of Wisconsin withholdings on his tax returns including the years 2014, 2015, and 2016.

Agent Austin reports that on January 28, 2015, Lightfield filed his 2014 State of Wisconsin income tax return by electronically filing it using Turbo Tax, and transmitting it to the State of Wisconsin Department of Revenue using his home internet service. Lightfield intentionally falsified his return by claiming \$4,721 in State of Wisconsin withholdings by his employer when they actually only withheld \$3,721. Lightfield stated he did this because he needed the money. The \$1,086 from this fraudulent return was deposited into Lightfield's Town Bank Account.

Agent Austin reports that on February 2, 2016, Lightfield filed his 2015 State of Wisconsin income tax return by electronically filing it using Turbo Tax, and transmitting it to the State of Wisconsin Department of Revenue using his home internet service. Lightfield intentionally falsified his return by claiming \$4,538 in State of Wisconsin withholdings by his employer when they actually only withheld \$3,838. Lightfield stated he did this because he needed the money. The \$1,850 from this fraudulent return was deposited into Lightfield's Town Bank Account.

Agent Austin reports that on February 16, 2017, Lightfield filed his 2016 State of Wisconsin income tax return by electronically filing it using Turbo Tax, and transmitting it to the State of Wisconsin Department of Revenue using his home internet service. Lightfield intentionally falsified his return by claiming \$6,267 in State of Wisconsin withholdings by his employer when they actually only withheld \$5,267. Lightfield stated he did this because he needed the money. The \$1,935 from this fraudulent return was directed to Lightfield's Town Bank Account but the refund was stopped by the State of Wisconsin Department of Revenue before being deposited.

Subscribed and sworn to before me on 02/09/18
Electronically Signed By:
Patricia J Hanson
District Attorney
State Bar #: 1021793

Electronically Signed By:
Dep. Kenneth Forray #6528
Complainant