

**FILED**  
**09-07-2021**  
**John Barrett**  
**Clerk of Circuit Court**  
**2021CF003810**  
**Honorable Danielle L.**  
**Shelton-40**  
**Branch 40**

**STATE OF WISCONSIN      CIRCUIT COURT      MILWAUKEE COUNTY****STATE OF WISCONSIN**

Plaintiff,

DA Case No.: 2021ML021218

Court Case No.:

vs.

**CRIMINAL COMPLAINT**

LEWIS, CHANTIA A  
7025 WEST HUMMINGBIRD COURT  
MILWAUKEE, WI 53233  
DOB: 01/05/1980

**Defendant(s).***For Official Use*

THE BELOW NAMED COMPLAINANT BEING DULY SWORN, ON INFORMATION AND BELIEF STATES THAT:

**Count 1: MISCONDUCT IN PUBLIC OFFICE (ACT IN EXCESS OF LAWFUL AUTHORITY)**

The above-named defendant between April of 2016 and July of 2020, at 200 East Wells Street and other locations, in the City of Milwaukee, Milwaukee County, Wisconsin, in her capacity as a public officer, did an act which she knew was forbidden by law to do in her official capacity, contrary to sec. 946.12(2), 939.50(3)(i) Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

**Count 2: THEFT (EMBEZZLEMENT) (VALUE EXCEEDING \$10,000)**

The above-named defendant between April of 2016 and June of 2020, at 8237 West Brown Deer Road and other locations, in the City of Milwaukee, Milwaukee County, Wisconsin, as trustee, having possession of money of Chantia 4 Progress, having a value exceeding \$10,000, did use such money without the owner's consent, contrary to the defendant's authority, and with intent to convert said property to her own use or to the use of any other person except the owner, contrary to sec. 943.20(1)(b) and (3)(c), 939.50(3)(g) 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.

**Count 3: THEFT BY FRAUD (VALUE NOT EXCEEDING \$2,500)**

The above-named defendant between November of 2016 and August of 2019, at 200 East Wells Street and other locations, in the City of Milwaukee, Milwaukee County, Wisconsin, did obtain title to property of City of Milwaukee, having a value not exceeding \$2,500, 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) and (3)(a), 939.51(3)(a) Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

**Count 4: CAMPAIGN FINANCE - INTENTIONALLY FILE FALSE REPORT OR STATEMENT**

The above-named defendant between January of 2017 and July of 2020, at 200 East Wells Street and other locations, in the City of Milwaukee, Milwaukee County, Wisconsin, did intentionally prepare or submit a false report to a filing officer under Chapter 11 of the Wisconsin Statutes where the intentional violation does not involve a specific figure or the intentional violation concerns a figure which exceeds \$100 in amount or value, contrary to sec. 11.1201 and 11.1401(1)(b), 939.50(3)(i), 11.1401(3)(a) Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

And furthermore, invoking the provisions of Wisconsin Statute 11.1401(3)(a), upon conviction for any violation of sub. (1)(a) or (b) committed during their candidacy, the court shall enter a supplemental judgment declaring a forfeiture of the candidate's right to office.

**Count 5: CAMPAIGN FINANCE - INTENTIONALLY ACCEPT UNLAWFUL DISBURSEMENT**

The above-named defendant between November of 2016 and February of 2020, at 8237 West Brown Deer Road and other locations, in the City of Milwaukee, Milwaukee County, Wisconsin, did intentionally receive anything of value or any promise or pledge thereof, constituting a disbursement made or obligation incurred contrary to Chapter 11 of the Wisconsin Statutes where the intentional violation does not involve a specific figure or the intentional violation concerns a figure which exceeds \$100 in amount or value, contrary to sec. 11.1208(1) and 11.1401(1)(b), 939.50(3)(i), 11.1401(3)(a) Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

And furthermore, invoking the provisions of Wisconsin Statute 11.1401(3)(a), upon conviction for any violation of sub. (1)(a) or (b) committed during their candidacy, the court shall enter a supplemental judgment declaring a forfeiture of the candidate's right to office.

**Probable Cause:**

Complainant is an Investigator with the Milwaukee County District Attorney's Office and bases this complaint upon his own investigation, as well as witness interviews and documentary evidence.

## OVERVIEW<sup>1</sup>

Chantia Lewis is an Alderwoman for the 9<sup>th</sup> Aldermanic District in the City of Milwaukee. She was first elected to that position in 2016. She was reelected in 2020. As an alderwoman for Milwaukee, Lewis is a member of the Common Council, which is tasked with exercising the policy-making and legislative powers of the city. In her role as a public official and candidate for public office, Lewis filed false campaign finance reports, in which she provided inaccurate information regarding her campaign account balances and her contributions and disbursements. She misappropriated funds belonging to her campaign by depositing campaign contributions into her personal bank accounts, as well as using campaign funds to pay for personal expenses. Lewis further falsely represented to the City of Milwaukee that she was owed reimbursement for expenses incurred on City-travel, when in fact she paid for those expenses out of her campaign account. All of these behaviors were in excess of her authority and were done without consent.

Lewis also committed several violations of campaign finance laws. In addition to filing false campaign finance reports, Lewis failed to accurately reports different contributions and disbursements. She structured a campaign contribution to avoid the contribution limit requirements. She misappropriated campaign funds by disbursing such funds for her personal use. All of these behaviors were done intentionally.

As a result of Lewis's malfeasance, she defrauded the City of Milwaukee and her campaign, collectively, of at least \$21,666.70.

## CAMPAIGN FINANCE RULES<sup>2</sup>

As an individual holding local office, Lewis is a candidate under Wis. Stat. § 11.0101(1)(c). Her candidate committee was the committee authorized to receive contributions and make disbursements to bring upon her election. See WIS. STAT. § 11.101(2). This committee was named Chantia4Progress and was controlled by Lewis. As a candidate committee, Lewis was subject to the campaign finance rules and reporting requirements set forth in Chapter 11 of the Wisconsin Statutes. See WIS. STAT. § 11.0103(1)(a). Lewis was required to file a campaign finance report (CFR), which must include all contributions received, disbursements made, and obligations incurred during the report period. See WIS. STAT. § 11.0103(1) and (3)(a). These CFRs are filed with the filing officer, meaning "the commission, board of election commissioners or official assigned to a committee or conduit under s. 11.0102." WIS. STAT. 11.0101(10)(14). Contributions include any "gift, subscription, loan, advance, or transfer of money to a committee." WIS. STAT. § 11.0101(8)(a)(1). All disbursements from a campaign finance account must be made by negotiable instrument; debit card and cash disbursements are prohibited. See WIS. STAT. § 11.0106. A disbursement includes any expenditures from the committee's depository account. WIS. STAT. § 11.0101(10)(a)(1).

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<sup>1</sup> This complaint alleges a continuing course of theft, occurring from April of 2016 until June of 2020. Wisconsin Statute § 971.36 allows these thefts to be prosecuted as a single crime because the property belonged to a single owner and the thefts were committed as part of a single deceptive scheme. WIS. STAT. § 971.36(3)(A). In alleging a continuing offense, it is sufficient to "allege generally a theft of property to a certain value committed between certain dates, without specifying any particulars." WIS. STAT. § 971.36(4). Further, the offense is not completed until the last act is completed and thus the statute of limitations does not begin to run until that time. See *State v. Elverman*, 2015 WI App 91, ¶ 30, 32, 367 Wis. 2d 126, 876 N.W.2d 511.

<sup>2</sup> In 2015, the Wisconsin Legislature repealed and created the campaign finance laws via 2015 Wisconsin Act 117. That Act was enacted on December 16, 2015, and became effective on December 18, 2015. No changes have been made since the enactment of Act 117. All of the offenses alleged within this complaint occurred after the effective date of the Act 117 and thus are governed by the current statutes.

A candidate must either designate a campaign treasurer or act as their own treasurer and, in either case, is obligated to comply with the registration and reporting requirements of Chapter 11, subchapter II. See WIS. STAT. § 11.0201(1). Either the candidate or the treasurer must certify the correctness of each report. WIS. STAT. § 11.0132(3)(c). All finance records must be maintained for a period of not less than three years after the date of the election the candidate participates in. WIS. STAT. § 11.0201(4). CFRs must itemize all contributions (including loans) and disbursements. WIS. STAT. § 11.0204(1)(a).

A candidate for local office may not accept individual contributions exceeding the statutory limits, between \$500 and \$6,000 depending on district size multiplied by two cents. See WIS. STAT. § 11.1101(1)(h)(2).<sup>3</sup> Any contributions greater than \$100 must be made by negotiable instrument or receipted credit card. See WIS. STAT. § 11.107. No campaign may accept any anonymous contribution greater than \$10.

Chapter 11 also provides prohibitions on different actions in relation to campaign financing. False campaign finance reports are prohibited. WIS. STAT. § 11.1201. The candidate and campaign are obligated to accurately report all contributions, disbursements, and obligations received, made, and incurred. See WIS. STAT. §§ 11.0103 and 11.0204(1)(a). A campaign may not disburse campaign funds for an individual's personal use, including the candidate's own personal use. See WIS. STAT. § 11.1208(2)(a).

A negligent violation of any of the provisions of Chapter 11 is a civil forfeiture offense. See WIS. STAT. § 11.1400. In contrast, an intentional violation of certain provisions of Chapter 11 is a criminal offense.<sup>4</sup>

### INVESTIGATION<sup>5</sup>

In May of 2020, the Milwaukee County District Attorney's Office conducted a review of the campaign finance reports (CFRs) and reimbursement for city-approved travel for the different alderpersons of Milwaukee. Complainant then conducted this review of the different alderpersons in Milwaukee to determine whether there were any improprieties in CFR filings and travel reimbursements. Complainant obtained copies of alderpersons' CFRs on file with the Milwaukee City Clerk, as well as copies of City of Milwaukee Common Council approved travel reimbursements through the Comptroller's office. A review of the documents for all of the alderpersons showed material inconsistencies in Lewis's filings as well as in her reimbursement for city approved travel. In particular, they showed that Lewis had received reimbursement from the City of Milwaukee for travel, which travel she then paid for out of her campaign account, Chantia 4 Progress, keeping the reimbursement for herself. A review also showed that Lewis would commingle her personal and campaign accounts; she would deposit campaign donations into her personal bank account and would use campaign funds for personal expenses. She would transfer funds directly from her campaign account to her personal account and then spend the money on personal items. She paid personal expenses directly from donations in her campaign finance account. Lewis repeatedly withdrew cash from her campaign

<sup>3</sup> In 2010, the federal census reflected that the population of Aldermanic District 9 was 40,807. As such, the maximum contribution allowed was \$816.14 (\$0.02\*40,087). See <https://city.milwaukee.gov/ImageLibrary/Groups/ccCouncil/2011-PDF/AD91.pdf>. The 2010 census was the most recent census at the time of these incidents.

<sup>4</sup> The provisions that lead to criminal liability are § 11.1204 (unlawful political contributions), provisions relating to registration or reporting requirements, subchapter XI (dealing with contributions), § 11.1201 (false reports and statements), § 11.1208 (unlawful political disbursements and obligations), or § 11.1303 (attribution of political contributions, disbursements, and communications).

<sup>5</sup> This investigation involved gathering significant amounts of personal identifying information for individuals, including addresses and financial account numbers. Complainant is aware that such information can be used to steal an individual's identity as well as financially exploit them. As such, this complaint has been redacted to remove addresses and financial account information from attached checks and CFRs. Unredacted copies are in Complainant's possession and Complainant has reviewed and relied upon such information in developing this investigation.

finance account via ATM with no documented campaign expenditures on her CFR. Throughout this time, Lewis filed inaccurate CFRs.

### LEGAL PROCESS

As part of this investigation, Complainant applied for and received subpoenas for multiple financial institutions and other businesses. These records helped to establish a pattern of Lewis using campaign funds to finance her personal expenses. In this investigation, Complainant located the following financial accounts connected to Lewis:

- USAA Federal Savings Bank Acct ending 80-8 – This account was in the name of Lewis and her husband, Anthony Lewis. It was active from 12/16/15 thru 9/17/20.
- USAA Acct ending 34-6 – This account was in the name of Lewis and her husband. It was active from 12/31/15 thru 9/28/20
- USAA Acct ending 52-8 – This account was in the name of Anthony Lewis. It was active from 12/12/17 thru 8/31/20
- Educators Credit Union (EDCU) Acct ending 8060 – This account was in the name of Lewis. It was active from 2/15/19 thru 10/31/20
- EDCU Acct ending – In the name of Chantia 4 Progress
  - Active from 1/1/16 thru 6/30/20
- Chase Bank Acct ending 3851

In addition, subpoenas and/or warrants were issued for Agape Love Bible College, Eagle Management, Explore America, Facebook, New York New York Las Vegas Hotel and Casino, Southwest Airlines, Square, Inc., US Bank, GM Financial, the Hilton Hotels, Marriott Hotels, and the City of Milwaukee. Complainant reviewed the records provided by each of these organizations. This review consisted of analyzing the relevant records and cross-referencing charges, deposits, and other financial transactions that occurred throughout the various accounts. All of this information was used in developing Complainant's basis of knowledge for this investigation.

This review and investigation revealed that Lewis engaged in multiple different fraudulent schemes, resulting in numerous campaign finance violations, as well as thefts from her campaign and the City of Milwaukee.

### VENUE

All of the offenses in this complaint occurred throughout Milwaukee County, as discussed throughout this complaint. At all times in this complaint, Lewis was a City of Milwaukee Alderperson, representing the City. According to Lewis's CFRs, during the time period covered by her January 2017 Continuing Report until her July 2019 Continuing Report, her campaign committee, Chantia 4 Progress was located at 6570 N. 73<sup>rd</sup> Street, in the City and County of Milwaukee. During the time period covered by her January 2020 July 2020 Continuing Reports, her committee was located at 8237 West Brown Deer Road, in the City and County of Milwaukee. Further, all CFRs were sent to the Elections Commission at Elections Commission, 200 East Wells Street, in the City and County of Milwaukee. This is also the location of the Office of the City Clerk, which processed and paid all travel reimbursements. In addition, Lewis made multiple ATM withdrawals of campaign money at the Educators Credit Union, located at 10811 West Park Place, in the City and County of Milwaukee. Lewis misappropriated campaign funds by spending them on multiple Milwaukee area businesses, including Matt's Foreign Car Specialists, and Agape Love Bible College. Finally, she misappropriated campaign contribution checks from multiple Milwaukee individuals and Milwaukee businesses, as discussed above.

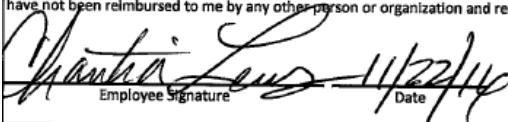

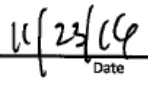


### LEWIS CLAIMED REIMBURSEMENT FOR CITY OF MILWAUKEE TRAVEL WHILE PAYING FOR THAT TRAVEL FROM HER CAMPAIGN ACCOUNT

As an elected official for the City of Milwaukee, Lewis was entitled to received reimbursement for expenses incurred while traveling on City business under City of Milwaukee Ordinance § 350-181(6). As noted by §350-181(6), reimbursement is allowed for those actual expenses directly related to the employee's job-related travel. In each of the instances below, Lewis engaged in "double-dipping." She requested reimbursement from the City for expenses she purported to have incurred. However, she did not spend her personal funds on those expenses; she expended campaign funds. As such, Lewis used campaign funds to pay her City of Milwaukee expenses. She then received reimbursement from the City and deposited that in her personal accounts, not repaying the campaign in any way. In each of these instances, Lewis was able to obtain money from the City of Milwaukee by falsely representing she personally incurred expenses on City of Milwaukee travel. This was done with the intent to defraud, and did defraud, the City of such funds. Between 2016 and 2020, Lewis participated in numerous City-sponsored travel in which she engaged in this double-dipping. Complainant reviewed the travel reimbursement paperwork Lewis provided to the City of Milwaukee, as well as her personal and campaign depository accounts, and other subpoenaed records to form the basis of knowledge for the below investigation.

#### 1. November of 2016 – Pittsburgh, Pennsylvania

Lewis traveled to Pittsburgh, Pennsylvania in November of 2016 for the National League of Cities 2016 City Summit. This travel occurred from November 15, 2016, thru November 19, 2016. This was approved City of Milwaukee travel for which Lewis would qualify for reimbursement. As part of her reimbursement request, Lewis was required to file a Statement of Expenses Incurred for the City of Milwaukee. In that statement, Lewis listed for reimbursement, among other expenses, her hotel stay, baggage fees, taxi services, and \$50 in dues. In her statements, Lewis personally certified that all of the expenses listed were actual expenses incurred by her and were not reimbursed by any other organization.

EMPLOYEE CERTIFICATION			
I hereby certify that the expenses listed on this statement represent actual expenses incurred by me in conjunction with my duties and responsibilities. I further warrant these expenses have not been reimbursed to me by any other person or organization and request reimbursement in accordance with ordinance §350-181.			
			
Employee Signature	Supervisor Signature	Date	

That certification was not true. In actuality, the expenses noted above were paid in whole or in part by the use of campaign funds. The below bank records from Lewis's campaign depository account show that campaign funds were used to pay these expenses:

11/17	Withdrawal Debit Card	50.00-
	11/16 632225133224 5942 NATL LEAGUE ONLINE 202-6263080 DC	
11/21	Withdrawal Debit Card	41.69-
	11/19 632420000674 4121 SQ *GOSQ.COM JANELLE CASEY Coraopolis PA	
11/21	Withdrawal Debit Card	25.00-
	11/19 632525000157 3000 UNITED 0162606647636 800-932-2732 TX	
11/21	Withdrawal Debit Card	1013.77-
	11/20 632520000222 3530 RENAISSANCE PITTSBURGH 412-562-1200 PA	

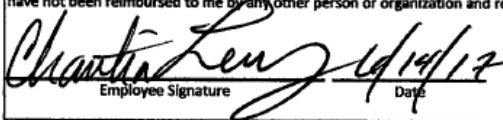
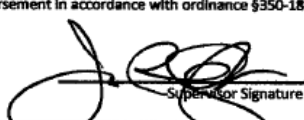

All of these expenses were paid for by the campaign. Lewis listed each of these four payments on her CFR as campaign expenditures.

As part of her reimbursement request, the City of Milwaukee issued a check to Lewis in the amount of \$988.32 on November 11, 2016. On November 14, 2016, Lewis deposited the entire amount via

mobile deposit in her personal USAA account. At no point was any corresponding amount deposited into her campaign account. As such, Lewis paid for City of Milwaukee expenses using her campaign account. She used these campaign funds in excess of her authority and without consent, as she was statutorily prohibited from using such funds for personal reasons. She then falsely represented to the City of Milwaukee that she was entitled to reimbursement for those funds. She received such reimbursement and deposited it into her personal accounts, never repaying the campaign. As such, Lewis defrauded the City of Milwaukee of \$988.32. She defrauded her campaign of \$1,130.46.

## 2. May of 2017 – Las Vegas, Nevada

Lewis traveled to Las Vegas, Nevada in May of 2017 for the ICSC RECon Global Retail Real Estate Convention.<sup>6</sup> The travel occurred from May 22, 2017, through May 25, 2017. This was approved City of Milwaukee travel for which Lewis would qualify for reimbursement. As part of her reimbursement request, Lewis was required to file a Statement of Expenses Incurred for the city of Milwaukee. In that statement, Lewis listed for reimbursement, among other expenses, taxi expenses, in the amount of \$37.58 (an Uber charge for \$11.37 and a taxi charge for 26.21). In her statements, Lewis personally certified that all of the expenses listed were actual expenses incurred by her and were not reimbursed by any other organization.

EMPLOYEE CERTIFICATION		
I hereby certify that the expenses listed on this statement represent actual expenses incurred by me in conjunction with my duties and responsibilities. I further warrant these expenses have not been reimbursed to me by any other person or organization and request reimbursement in accordance with ordinance §350-181.		
		
Employee Signature	Supervisor Signature	Date

That certification was not true. Lewis paid for both those expenses using campaign funds. Lewis listed these payments on her CFR as campaign expenditures. In addition, Lewis made multiple other expenditures while in Las Vegas and listed them on her CFR as campaign expenditures. The below shows the different expenditures she listed on her CFR:

05/22/17	Uber	Las Vegas	NV	Travel/Cab	\$17.48
05/22/17	Westgate Hotel	Las Vegas	NV	Travel/Food	\$50.00
05/22/17	Taxi	Las Vegas	NV	Travel/Cab	\$12.72
05/23/17	Uber	Las Vegas	NV	Travel/Cab	\$11.34
05/23/17	Uber	Las Vegas	NV	Travel/Cab	\$6.60
05/24/17	Uber	Las Vegas	NV	Travel/Cab	\$8.58
05/24/17	Taxi	Las Vegas	NV	Travel/Cab	\$26.21
05/24/17	Uber	Las Vegas	NV	Travel/Cab	\$6.60
05/24/17	Westgate Buffet	Las Vegas	NV	Travel/Food	\$28.98
05/24/17	Strip Burger	Las Vegas	NV	Travel/Food	\$33.07
05/25/17	Uber	Las Vegas	NV	Travel/Cab	\$11.37

These different expenditures were all done while on City of Milwaukee business. These were not campaign expenses. There is no documentary support for any of these expenses being related to the campaign. There is no reason that a local public official who deals solely with City of Milwaukee issues would need to expend campaign funds while in Las Vegas. In total, Lewis misappropriated \$212.95 of campaign funds to finance her time in Las Vegas on City business.

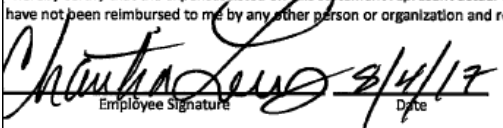

As part of her reimbursement request, the City of Milwaukee issued a check to Lewis in the amount of \$388.79 on May 11, 2017. On May 12, 2017, Lewis deposited the entire amount via mobile deposit into her personal USAA account. At no point was any corresponding amount deposited into her campaign

<sup>6</sup> The International Council of Shopping Centers' (ICSC) RECon Conference is a global conference for the shopping center industry to provide networking and educational opportunities to the industry. See <https://www.icsc.com/who-we-are/our-mission>.

account. As such, Lewis paid for City of Milwaukee expenses, in part, using her campaign account. She used these campaign funds in excess of her authority and without consent, as she was statutorily prohibited from using such funds for personal reasons. She then falsely represented to the City of Milwaukee she was entitled to reimbursement for those funds. She received such reimbursement and deposited it into her personal accounts, never repaying the campaign. As such, Lewis defrauded the City of Milwaukee of \$37.58.

### 3. July of 2017 – Houston, Texas

Lewis traveled to Austin, Texas in July of 2017 for the Local Progress 6<sup>th</sup> Annual Convening. The travel occurred from July 27, 2017, through July 29, 2017. This was approved City of Milwaukee travel for which Lewis would qualify for reimbursement. As part of her reimbursement request, Lewis was required to file a Statement of Expenses Incurred for the City of Milwaukee. In that statement, Lewis listed for reimbursement, amongst other expenses, reimbursement for Uber (\$50.36) and for baggage (\$50.00). In her statements, Lewis personally certified that all of the expenses listed were actual expenses incurred by her and were not reimbursed by any other organization.

EMPLOYEE CERTIFICATION		
I hereby certify that the expenses listed on this statement represent actual expenses incurred by me in conjunction with my duties and responsibilities. I further warrant these expenses have not been reimbursed to me by any other person or organization and request reimbursement in accordance with ordinance §350-181.		
		
Employee Signature	Supervisor Signature	
8/4/17	8/4/17	
Date	Date	

This certification was not true. Lewis paid for these expenses using campaign funds. Lewis's campaign depository account records show the below payments in Texas at the time of Lewis's trip:

07/28	Withdrawal Debit Card	22.47-
	07/28 720920000937 5812 SHADY GROVE AUSTIN TX	
07/28	Withdrawal Debit Card	29.90-
	07/27 720821100898 4121 SQ *GOSQ.COM ALTAF HUSSAI Austin TX	
07/31	Withdrawal Debit Card	25.54-
	07/29 721026004718 5812 HOOVERS COOKING AUSTIN TX	
07/31	Withdrawal Debit Card	15.99-
	07/27 720923937360 5812 AT T EXECUTIVE13199203 AUSTIN TX	
07/31	Withdrawal Debit Card	25.00-
	07/29 721128978000 3001 AMERICAN AIR0010288852447 FORT WORTH TX	
07/31	Withdrawal Debit Card	28.98-
	07/29 721120978000 3001 AMERICAN AIR0010655191193 FORT WORTH TX	
07/31	Withdrawal Debit Card	14.57-
	07/29 721020715896 4121 UBER TRIP GWVQW HELP.UBER.COM CA	
07/31	Withdrawal Debit Card	20.46-
	07/29 721022719913 4121 UBER TRIP IIWTQ HELP.UBER.COM CA	
07/31	Withdrawal Debit Card	2.00-
	07/29 721124713926 4121 UBER TIP IIWTQ HELP.UBER.COM CA	
07/31	Withdrawal Debit Card	1.00-
	07/29 721026100982 4121 UBER TECHNOLOGIES INC 866-576-1039 CA	
07/31	Withdrawal Debit Card	27.00-
	07/28 720929042462 8651 ACTBLUE*STEPHANIMORALES actblueecc.com MA	

On July 31, \$25 of the baggage fee was charged to the campaign. The other \$25 was paid for through Lewis's personal USAA account. The Uber charges were all paid for by the campaign. Lewis listed these payments on her CFR as campaign expenditures. In addition, Lewis made multiple other expenditures while in Austin and listed them on her CFR as campaign expenditures. The below shows the different expenditures she listed on her CFR:



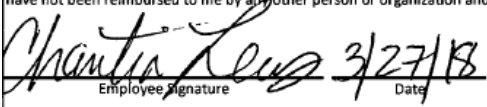

07/31/17	Uber				Travel/Cab	\$22.46
07/31/17	Uber				Travel/Cab	\$14.57
07/31/17	American Airlines				Travel	\$53.98
07/31/17	T Executive				Food/Travel	\$15.99
07/31/17	Hoovers Cooking				Food/Travel	\$25.54

These different expenditures were all done while on City of Milwaukee business. These were not campaign expenses. There is no documentary support for any of these expenses being related to the campaign. There is no reason that a local public official who deals solely with City of Milwaukee issues would need to expend campaign funds while in Texas. In total, Lewis misappropriated \$132.54 of campaign funds to finance her time in Texas on City business.

As part of her reimbursement request, the City of Milwaukee issued a check to Lewis in the amount of \$171.00 on July 20, 2017. On July 25, 2017, Lewis deposited the entire amount via mobile deposit into her personal USAA account. At no point was any corresponding amount deposited into her campaign account. As such, Lewis paid for City of Milwaukee expenses, in part, using her campaign account. She used these campaign funds in excess of her authority and without consent, as she was statutorily prohibited from using such funds for personal reasons. She then falsely represented to the City of Milwaukee she was entitled to reimbursement for those funds. She received such reimbursement and deposited it into her personal accounts, never repaying the campaign. As such, Lewis defrauded the City of Milwaukee of \$75.36.

#### 4. March of 2018 – Washington D.C.

Lewis traveled to Washington DC in March of 2018 for the 2018 NLC Congressional City Conference. The travel occurred from March 10, 2018, through March 14, 2018. This was approved City of Milwaukee travel for which Lewis would qualify for reimbursement. As part of her reimbursement request, Lewis was required to file a Statement of Expenses Incurred for the City of Milwaukee. In that statement, Lewis listed for reimbursement, amongst other expenses, reimbursement for taxi expenses in the amount of \$24.08. In her statements, Lewis personally certified that all of the expenses listed were actual expenses incurred by her and were not reimbursed by any other organization.

EMPLOYEE CERTIFICATION			
I hereby certify that the expenses listed on this statement represent actual expenses incurred by me in conjunction with my duties and responsibilities. I further warrant these expenses have not been reimbursed to me by any other person or organization and request reimbursement in accordance with ordinance §350-181.			
	3/27/18		3/27/18
Employee Signature	Date	Supervisor Signature	Date

This certification was not true. Lewis paid for these expenses using campaign funds. Lewis's campaign depository account records show the below payment in DC at the time of Lewis's trip:

03/12

Withdrawal Debit Card

24.08-

03/10 807028100662 4121 SQ \*DC VIP CAB WASHINGTON DC

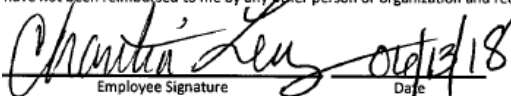

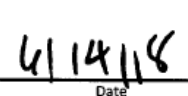
Further, Lewis listed this payment on her CFR as campaign expenditures. This expenditures was done while on City of Milwaukee business. It was not a campaign expense. There is no documentary support for this expense being related to the campaign. There is no reason that a local public official who deals solely with City of Milwaukee issues would need to expend campaign funds while in Washington DC.

As part of her reimbursement request, the City of Milwaukee issued a check to Lewis in the amount of \$1,034.00 on March 2, 2018. On March 5, 2018, Lewis deposited the entire amount via mobile deposit into her personal USAA account. At no point was any corresponding amount deposited into her

campaign account. As such, Lewis paid for City of Milwaukee expenses, in part, using her campaign account. She used these campaign funds in excess of her authority and without consent, as she was statutorily prohibited from using such funds for personal reasons. She then falsely represented to the City of Milwaukee she was entitled to reimbursement for those funds. She received such reimbursement and deposited it into her personal accounts, never repaying the campaign. As such, Lewis defrauded the City of Milwaukee and her campaign each of \$24.08.

### 5. May of 2018 – Las Vegas, Nevada

Lewis traveled to Las Vegas, Nevada in May of 2018 for the ICSC RECon Global Retail Real Estate Convention.<sup>7</sup> The travel occurred from May 19, 2018, through May 23, 2018. This was approved City of Milwaukee travel for which Lewis would qualify for reimbursement. As part of her reimbursement request, Lewis was required to file a Statement of Expenses Incurred for the city of Milwaukee. In that statement, Lewis listed for reimbursement, among other expenses, her flight (\$225.98) and Uber charges (\$49.35). In her statements, Lewis personally certified that all of the expenses listed were actual expenses incurred by her and were not reimbursed by any other organization.

EMPLOYEE CERTIFICATION			
I hereby certify that the expenses listed on this statement represent actual expenses incurred by me in conjunction with my duties and responsibilities. I further warrant these expenses have not been reimbursed to me by any other person or organization and request reimbursement in accordance with ordinance §350-181.			
			
Employee Signature	Supervisor Signature	Date	

That certification was not true. Lewis paid for both those expenses using campaign funds. She paid the flight fees and \$38.34 of the Uber charges. Lewis listed these payments on her CFR as campaign expenditures. In addition, Lewis made multiple other expenditures while in Las Vegas and listed them on her CFR as campaign expenditures. The below shows the different expenditures she listed on her CFR:

5/21/2018	EXPEDIA				Travel	\$610.21
5/21/2018	UBER				Travel	\$15.53
5/21/2018	Uber				Travel	\$33.68
5/21/2018	Uber				Travel	\$38.34
5/21/2018	New York New York Hotel	Las Vegas	NV		Travel/Convention Fees	\$167.80
5/21/2018	Uber				Travel	\$11.83
5/23/2018	Hooters Saloon	Las Vegas	NV		Food	\$53.60

These different expenditures were all done while on City of Milwaukee business. These were not campaign expenses. There is no documentary support for any of these expenses being related to the campaign. There is no reason that a local public official who deals solely with City of Milwaukee issues would need to expend campaign funds while in Las Vegas. In total, Lewis misappropriated \$930.99 of campaign funds to finance her time in Las Vegas on City business.


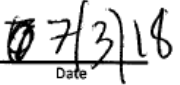
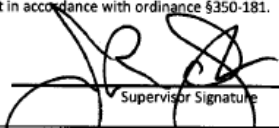

As part of her reimbursement request, the City of Milwaukee issued a check to Lewis in the amount of \$2,007.52 on May 8, 2018. On May 14, 2018, Lewis deposited the entire amount via mobile deposit into her personal USAA account. At no point was any corresponding amount deposited into her campaign account. As such, Lewis paid for City of Milwaukee expenses, in part, using her campaign account. She used these campaign funds in excess of her authority and without consent, as she was

<sup>7</sup> The International Council of Shopping Centers' (ICSC) RECon Conference is a global conference for the shopping center industry to provide networking and educational opportunities to the industry. See <https://www.icsc.com/who-we-are/our-mission>.

statutorily prohibited from using such funds for personal reasons. She then falsely represented to the City of Milwaukee she was entitled to reimbursement for those funds. She received such reimbursement and deposited it into her personal accounts, never repaying the campaign. As such, Lewis defrauded the City of Milwaukee of \$264.32.

## 6. June of 2018 – Little Rock, Arkansas

Lewis traveled to Little Rock, Arkansas in June of 2018 for the NLC Summer Board and Leadership Meeting. This travel occurred from June 25, 2018, through June 27, 2018. This was approved City of Milwaukee travel for which Lewis would qualify for reimbursement. As part of her reimbursement request, Lewis was required to file a Statement of Expenses Incurred for the City of Milwaukee. In that statement, Lewis listed for reimbursement, among other expenses, her baggage fees in the amount of \$85.00. In her statements, Lewis personally certified that all of the expenses listed were actual expenses incurred by her and were not reimbursed by any other organization.

EMPLOYEE CERTIFICATION			
I hereby certify that the expenses listed on this statement represent actual expenses incurred by me in conjunction with my duties and responsibilities. I further warrant these expenses have not been reimbursed to me by any other person or organization and request reimbursement in accordance with ordinance §350-181.			
 Employee Signature	 Date	 Supervisor Signature	 Date

That certification was not true. In actuality, the baggage fees noted above were paid in whole by the use of campaign funds. The below bank records from Lewis's campaign depository account show that campaign funds were used to pay these expenses:

06/27	Withdrawal Debit Card	25.00-
06/25	817720978001 3001 AMERICAN AIR0010289547575 FORT WORTH TX	
06/27	Withdrawal Debit Card	35.00-
06/25	817727978001 3001 AMERICAN AIR0010626955886 FORT WORTH TX	
06/29	Withdrawal Debit Card	25.00-
06/27	817920871791 3058 DELTA AIR Baggage Fee LITTLE ROCK AR	

All of these expenses were paid for by the campaign. Lewis listed each of these payments on her CFR as campaign expenditures. She included one of the \$25 fees as \$35 on her CFR. These different expenditures were all done while on City of Milwaukee business. These were not campaign expenses. There is no documentary support for any of these expenses being related to the campaign. There is no reason that a local public official who deals solely with City of Milwaukee issues would need to expend campaign funds while in Arkansas. In total, Lewis misappropriated \$85 of campaign funds to finance her time in Las Vegas on City business.

As part of her reimbursement request, the City of Milwaukee issued a check to Lewis in the amount of \$482.10 on June 20, 2018. On June 21, 2018, Lewis deposited the entire amount via mobile deposit into her personal USAA account. At no point was any corresponding amount deposited into her campaign account. As such, Lewis paid for City of Milwaukee expenses, in part, using her campaign account. She used these campaign funds in excess of her authority and without consent, as she was statutorily prohibited from using such funds for personal reasons. She then falsely represented to the City of Milwaukee she was entitled to reimbursement for those funds. She received such reimbursement and deposited it into her personal accounts, never repaying the campaign. As such, Lewis defrauded the City of Milwaukee of \$85.00.

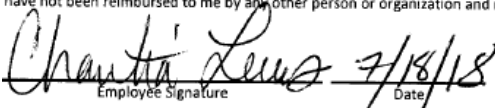
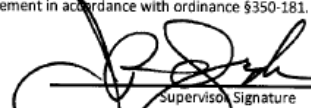

**7. July of 2018 – Minneapolis, Minnesota**

Lewis traveled to Minneapolis, Minnesota in July of 2018 for the 2018 Local Progress Convening. This travel occurred from July 11, 2018, through July 13, 2018. This was approved City of Milwaukee travel for which Lewis would qualify for reimbursement. As part of her reimbursement request, Lewis was required to file a Statement of Expenses Incurred for the City of Milwaukee. In that statement, Lewis listed for reimbursement, among other expenses, her hotel stay in the amount of \$157.85.

Lodging

10. Total \$ 157.85

In her statements, Lewis personally certified that all of the expenses listed were actual expenses incurred by her and were not reimbursed by any other organization.

EMPLOYEE CERTIFICATION		
I hereby certify that the expenses listed on this statement represent actual expenses incurred by me in conjunction with my duties and responsibilities. I further warrant these expenses have not been reimbursed to me by any other person or organization and request reimbursement in accordance with ordinance §350-181.		
		
Employee Signature	Supervisor Signature	Date

That certification was not true. In actuality, the hotel fee noted above was paid in whole by the use of campaign funds. The below bank records from Lewis's campaign depository account show that campaign funds were used to pay this expense:

07/16 Withdrawal Debit Card 157.85-  
07/12 819428261940 3504 HILTON HOTELS MINNEAPOLIS MN

This expense was paid for by the campaign. However, Lewis did not list this as an expenditure on her CFR. This hotel stay occurred while on City of Milwaukee business. It was not campaign expenses. There is no documentary support for this expense being related to the campaign. There is no reason that a local public official who deals solely with City of Milwaukee issues would need to expend campaign funds while in Minnesota on City business. In total, Lewis misappropriated \$157.85 of campaign funds to finance her time in Minnesota on City business.

As part of her reimbursement request, the City of Milwaukee issued a check to Lewis in the amount of \$365.00 on July 6, 2018. On July 10, 2018, Lewis deposited the entire amount via mobile deposit into her personal USAA account. At no point was any corresponding amount deposited into her campaign account. As such, Lewis paid for City of Milwaukee expenses, in part, using her campaign account. She used these campaign funds in excess of her authority and without consent, as she was statutorily prohibited from using such funds for personal reasons. She then falsely represented to the City of Milwaukee she was entitled to reimbursement for those funds. She received such reimbursement and deposited it into her personal accounts, never repaying the campaign. As such, Lewis defrauded the City of Milwaukee of \$157.85.

**8. July of 2018 – Hollywood, Florida**

Lewis traveled to Hollywood, Florida in July of 2018 for the National League of Cities NBC LEO 2018 Summit. This travel occurred from July 25, 2018, through July 28, 2018. This was approved City of Milwaukee travel for which Lewis would qualify for reimbursement. As part of her reimbursement request, Lewis was required to file a Statement of Expenses Incurred for the City of Milwaukee. In that

Chantia A Lewis, DOB: 01/05/1980

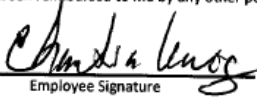
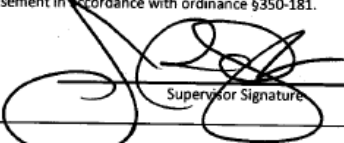
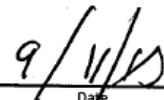
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13

statement, Lewis listed for reimbursement, among other expenses, her hotel stay and transportation expenses in the amount of \$409.76 and 93.04.

## B. Other (List Below)

a. Urber & Taxi	\$	93.04
<u>Lodging</u>		
10. Total	\$	809.76 <sup>8</sup>

In her statements, Lewis personally certified that all of the expenses listed were actual expenses incurred by her and were not reimbursed by any other organization.

EMPLOYEE CERTIFICATION			
I hereby certify that the expenses listed on this statement represent actual expenses incurred by me in conjunction with my duties and responsibilities. I further warrant these expenses have not been reimbursed to me by any other person or organization and request reimbursement in accordance with ordinance §350-181.			
			
Employee Signature	Date	Supervisor Signature	Date

That certification was not true. In actuality, the fees noted above was paid in whole by the use of campaign funds. The below bank records from Lewis's campaign depository account show that campaign funds were used to pay these expenses:

07/27	Withdrawal Debit Card	27.90-
	07/25 820726262788 4121 TAXI SVC FORT LAUDERDA FT LAUDERDALE FL	
07/30	Withdrawal Debit Card	43.75-
	07/28 820920715309 4121 UBER TRIP XV7D2 HELP.UBER.COM CA	
07/30	Withdrawal Debit Card	21.39-
	07/29 821024715317 4121 UBER TRIP DXZQG HELP.UBER.COM CA	
07/30	Withdrawal Debit Card	409.76-
	07/28 821023732109 3504 HILTON DIPLOMAT RESORT HOLLYWOOD FL	

These expenses were paid for by the campaign. However, Lewis did not list them as expenditures on her CFR. These expenses occurred while on City of Milwaukee business. They were not campaign expenses. There is no documentary support for these expenses being related to the campaign. There is no reason that a local public official who deals solely with City of Milwaukee issues would need to expend campaign funds while in Florida on City business. In total, Lewis misappropriated \$502.80 of campaign funds to finance her time in Florida on City business.

As part of her reimbursement request, the City of Milwaukee issued a check to Lewis in the amount of \$1,237.56 on July 20, 2018. On July 24, 2018, Lewis deposited the entire amount via mobile deposit into her personal USAA account. At no point was any corresponding amount deposited into her campaign account. As such, Lewis paid for City of Milwaukee expenses, in part, using her campaign account. She used these campaign funds in excess of her authority and without consent, as she was statutorily prohibited from using such funds for personal reasons. She then falsely represented to the City of Milwaukee she was entitled to reimbursement for those funds. She received such reimbursement and deposited it into her personal accounts, never repaying the campaign. As such, Lewis defrauded the City of Milwaukee of \$502.80.

<sup>8</sup> Lodging was listed as \$809.76. However, there was a \$400 advanced cash deposit paid. As such, the total cost of lodging the City reimbursed to Lewis was \$409.76.

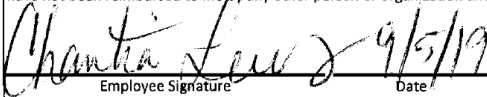
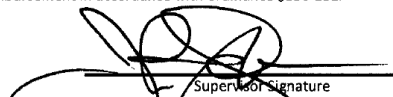



**9. August of 2019 – Miami, Florida**

Lewis traveled to Miami, Florida, in August of 2019 for the YEO Network National Convening 2019.<sup>9</sup> This conference occurred from August 1, 2019, until August 4, 2019. This was approved City of Milwaukee travel to which Lewis would qualify for reimbursement under City of Milwaukee Ordinance § 350-181(6). As part of her reimbursement request, Lewis was required to file a Statement of Expenses Incurred for the City of Milwaukee. In that statement, Lewis listed for reimbursement, among other expenses, expenses for parking, Uber travel, and baggage.

a. Airport parking	\$	52.71
b. Uber	\$	31.73
c. Baggage	\$	60.00

In that statement, Lewis personally certified that all of the expenses listed were actual expenses incurred by her and were not reimbursed by any other organization.

EMPLOYEE CERTIFICATION		
I hereby certify that the expenses listed on this statement represent actual expenses incurred by me in conjunction with my duties and responsibilities. I further warrant these expenses have not been reimbursed to me by any other person or organization and request reimbursement in accordance with ordinance §350-181.		
		
Employee Signature	Supervisor Signature	Date

That certification was not true. In actuality, the expenses noted above were paid in whole or in part by the use of campaign funds. The below bank records from Lewis's campaign depository account show that campaign funds were used to pay these expenses.

08/02	Withdrawal Debit Card	52.71-
	08/01 921323637805 7523 WAY - PARKING 4085983338 CA	
08/02	Withdrawal Debit Card	16.56-
	08/01 921322717712 4121 UBER TRIP HELP.UBER.COM CA	
08/05	Withdrawal Debit Card	30.00-
	08/01 921427978001 3001 AMERICAN AIR0010268531477 FORT WORTH TX	
08/05	Withdrawal Debit Card	15.17-
	08/04 921623713938 4121 UBER TRIP HELP.UBER.COM CA	

These expenses were paid by the campaign. The parking was paid for completely by the campaign. Lewis listed Uber payments of \$31.73 on her reimbursement form. Adding together the Uber payments from 8/2 and 8/5 gives exactly \$31.73. The 8/5 payment to American Airline reflects half of the baggage expenses. None of these expenses were listed on Lewis's CFRs. These expenses all occurred while on City of Milwaukee business. They were not campaign expenses. There is no documentary support for these expenses being related to the campaign. There is no reason that a local public official who deals solely with City of Milwaukee issues would need to expend campaign funds while in Florida on City business.

<sup>9</sup> The YEO Network is a nonpartisan program to provides support for elections leaders under the age of 35 with a focus on community building. See <https://www.yeonetwork.org/about-us>.

As part of her reimbursement request, the City of Milwaukee issued a check to Lewis in the amount of \$207.00 on July 26, 2019. On August 2, 2019, Lewis deposited that entire amount via mobile deposit in her personal USAA account. At no point was any corresponding amount deposited into her campaign account. As such, Lewis paid for City of Milwaukee expenses using her campaign account. She used these campaign funds in excess of her authority and without consent, as she was statutorily prohibited from using such funds for personal reasons. She then falsely represented to the City of Milwaukee that she was entitled to reimbursement for those funds. She received such reimbursement and deposited it into her personal accounts, never repaying the campaign. As such, Lewis defrauded both her campaign and the City of Milwaukee of \$114.44 each.

#### Total Misappropriation Through Fraudulent Reimbursements

Lewis was able to obtain reimbursement funds from the City of Milwaukee by falsely representing that she had personally incurred expenses while on City-sponsored business. As a result of these false representations, the City issued reimbursement checks to Lewis for expenses that did not qualify for reimbursement. Further, in her role as trustee of the campaign funds, Lewis intentionally used such funds for her own benefit. This was contrary to her authority and without the campaign's consent. As a result of Lewis's misappropriation, the following amounts were lost:

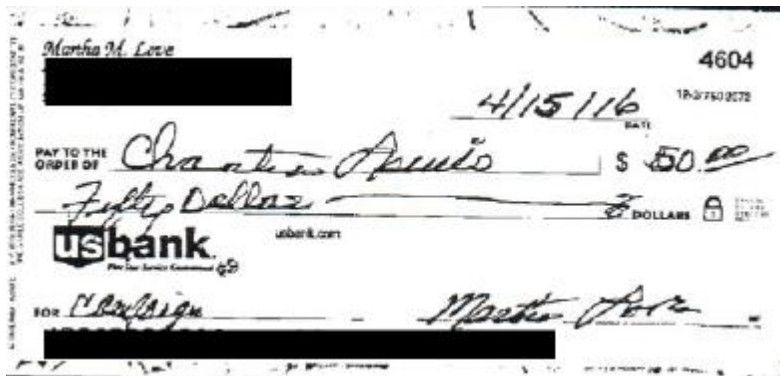
Date	Trip	Loss to City	Loss to Campaign
11/21/16	Pittsburgh	\$988.32	\$1,130.46
05/24/17	Las Vegas	\$37.58	\$212.95
07/29/17	Houston	\$75.36	\$132.54
03/12/18	Washington DC	\$24.08	\$24.08
05/21/18	Las Vegas	\$264.32	\$930.99
06/25/18	Little Rock	\$85.00	\$85.00
07/12/18	Minneapolis	\$157.85	\$157.85
07/25/18	Florida	\$502.80	\$502.80
08/02/19	Florida	\$114.44	\$114.44
<b>Total:</b>		<b>\$2,249.75</b>	<b>\$3,291.11</b>

#### **LEWIS INTENTIONALLY FAILED TO DEPOSIT AND REPORT CAMPAIGN CONTRIBUTIONS**

As a candidate for public office, Lewis would frequently receive checks for donations to her campaign and checks from fundraisers to support her campaign. Those donations were intended for the campaign and were not Lewis's personal property; she held those funds in trust for the campaign and only possessed them by virtue of her role as trustee for the campaign contributions. Once the contributions were under Lewis's control, at that point they were considered received by the campaign and were campaign property. See WIS. STAT. § 11.0103(2)(a)(1). Despite that, on multiple occasions Lewis deposited contributions that were intended for her campaign into her personal depository accounts. This was all done without consent, as Lewis was legally proscribed from engaging in such behavior and forbidden statutorily from making any personal disbursements from the campaign to herself. See WIS. STAT. § 11.1208(2)(a). Complainant reviewed Lewis's campaign and personal depository accounts, as well as copies of contribution checks and campaign records to form the basis of knowledge for the below investigation.

##### **1. Martha Love Check**

On April 15, 2016, Lewis received a check from Martha Love in the amount of \$50 dollars. Love lived at 1846 W. Cherry Street, in the City and County of Milwaukee. While payable to Chantia Lewis, the memo line noted that the check was for the campaign.



Further, Complainant interviewed Martha Love, who stated that this check was written for campaign purposes, not a personal gift to Lewis. Despite being written for the campaign, Lewis failed to list this contribution on her July 2016 Continuing CFR. There was no corresponding deposit of this check into Lewis campaign account. On April 18, 2016, Lewis deposited this campaign contribution into her personal USAA account. By April 27, 2016, Lewis's USAA account had a zero balance. There were no deposits into Lewis's campaign account between the time the contribution check was deposited into Lewis's personal account and the time her personal account reached a zero balance. There were no deposits from Lewis's personal accounts into her campaign account to pay back the misappropriated contribution check. This demonstrates that the entirety of the campaign funds that were deposited into Lewis's personal account had been misappropriated by April 27, 2016. This further demonstrates that Lewis intentionally took the funds, as absent those funds her personal account would have been overdrawn by April 27, 2016.

In depositing this contribution check into her personal account and failing to list it on her CFR, Lewis failed to make a full report of all contributions received under Chapter 11. Further, as these funds were intended for her campaign, she received them in trust. It was contrary to her authority to deposit such funds in her personal account and then use those funds for her own benefit. This was all done without consent, as Lewis was legally proscribed from engaging in such behavior and forbidden statutorily from making any personal disbursements.

## 2. Virani Inc Check

On April 6, 2017, Lewis received a check from Mohammed Ghaffar in the amount of \$100.00. This check from written on behalf of Ghaffar's business, Virani, Inc. This business was located at 7965 North 76<sup>th</sup> Street, in the City and County of Milwaukee. While payable to Chantia Lewis, the memo line noted that the check was for fundraising.



Further, Complainant interviewed Mohammed Ghaffar, who stated that this check was written for campaign purposes, not a personal gift to Lewis. Ghaffar stated gave his check to Lewis at a lunch fundraiser for her campaign. Lewis listed this contribution on her July 2017 Continuing CFR with a date of April 6, 2017:

04/06/17	Chantia	Mohammed	[REDACTED]	Alwaukee	WI	51223 EF Gas Station 7045 N 74th St	\$100
				Alwaukee	WI	51204 Elm Northside	\$100

This further provides support that this was a campaign contribution and thus belonged to the campaign. Despite that, there was no corresponding deposit of this check into Lewis's campaign account. On May 11, 2017, Lewis deposited this campaign contribution into her personal USAA account. By May 25, 2017, that account was overdrawn. The only deposits into Lewis's campaign account between the time the contribution check was deposited into her personal account and the time her personal account became overdrawn were checks from ActBlue Non-Federal and from Toor Retail LLC, totaling \$248.02. Neither of these checks were drawn from any of Lewis's personal accounts; they were separate contribution checks and thus do not replace the misappropriated Virani check. There were no deposits from Lewis's personal accounts into her campaign account to pay back the misappropriated contribution check. Altogether, this demonstrates that the entirety of the campaign funds that were deposited into Lewis's personal account had been misappropriated by May 25, 2017. This further demonstrates that Lewis intentionally took the funds, as those funds were needed to cover her expenses.

In depositing this contribution check into her personal account while listing it on her CFR, Lewis failed to make a full report of all contributions received under Chapter 11, as she falsely certified that money was deposited into her campaign account when it was not. Further, as these funds were intended for her campaign, she received them in trust. It was contrary to her authority to deposit such funds in her personal account and then use those funds for her own benefit. This was all done without consent, as Lewis was legally proscribed from engaging in such behavior and forbidden statutorily from making any personal disbursements.

### 3. Annette Bhatia Check

On August 5, 2017, Lewis received a check from Annette Bhatia in the amount of \$100.00. While payable to Chantia Lewis, the memo line noted that the check was a donation.



Further, Complainant interviewed Annette Bhatia, who stated that this check was written for campaign purposes, not a personal gift to Lewis. Lewis listed this contribution on her January 2018 Continuing CFR with a date of August 5, 2017:

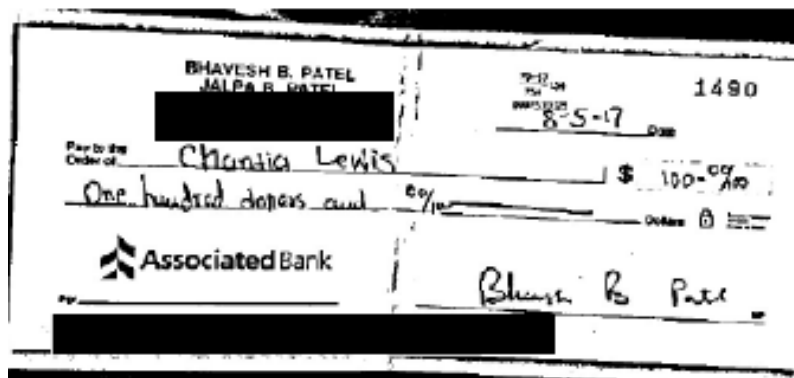
CHANTIA A LEWIS	Bhatia	Anette	[REDACTED]	Brookfield	WI	53006/Self Employed	\$100
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This further provides support that this was a campaign contribution and thus belonged to the campaign. Despite that, there was no corresponding deposit of this check into Lewis's campaign account. On or about August 11, 2017, Lewis deposited this campaign contribution into her personal USAA account. By August 28, 2017, that account was overdrawn. The only deposits into Lewis's campaign account between the time the contribution check was deposited into her personal account and the time her personal account became overdrawn were checks were other contribution checks; nothing was transferred from Lewis's personal accounts to the campaign account. Altogether, this demonstrates that the entirety of the campaign funds that were deposited into Lewis's personal account had been misappropriated by August 28, 2017. This further demonstrates that Lewis intentionally took the funds, as those funds were needed to cover her expenses.

In depositing this contribution check into her personal account while listing it on her CFR, Lewis failed to make a full report of all contributions received under Chapter 11, as she falsely certified that money was deposited into her campaign account when it was not. Further, as these funds were intended for her campaign, she received them in trust. It was contrary to her authority to deposit such funds in her personal account and then use those funds for her own benefit. This was all done without consent, as Lewis was legally proscribed from engaging in such behavior and forbidden statutorily from making any personal disbursements.

#### 4. Bhavesh Patel Check

On August 5, 2017, Lewis received a check from Bhavesh Patel in the amount of \$100.00. The check was payable to Chantia Lewis and the memo line was blank.



Despite the lack of a memo entry, it is clear this check was intended for a campaign contribution. Complainant interviewed Bhavesh Patel, who stated that this check was written for campaign purposes, not a personal gift to Lewis. Patel gave Lewis his check at a fundraiser she held for business owners. Further, Lewis listed this contribution on her January 2018 Continuing CFR with a date of August 5, 2017:



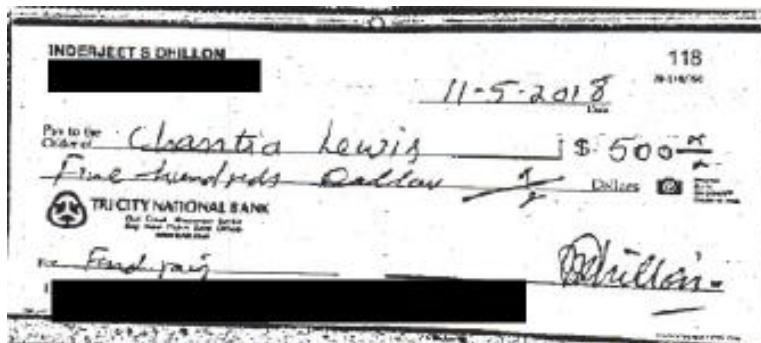
08/05/17	Patel	Shavesh	[REDACTED]	Germanown	IN	53022	Self Employed	\$100
08/05/17	Patel	Shavesh	[REDACTED]					

This further provides support that this was a campaign contribution and thus belonged to the campaign. Despite that, there was no corresponding deposit of this check into Lewis's campaign account. On or about August 11, 2017, Lewis deposited this campaign contribution into her personal USAA account. By August 28, 2017, that account was overdrawn. The only deposits into Lewis's campaign account between the time the contribution check was deposited into her personal account and the time her personal account became overdrawn were checks were other contribution checks; nothing was transferred from Lewis's personal accounts to the campaign account. Altogether, this demonstrates that the entirety of the campaign funds that were deposited into Lewis's personal account had been misappropriated by August 28, 2017. This further demonstrates that Lewis intentionally took the funds, as those funds were needed to cover her expenses.

In depositing this contribution check into her personal account while listing it on her CFR, Lewis failed to make a full report of all contributions received under Chapter 11, as she falsely certified that money was deposited into her campaign account when it was not. Further, as these funds were intended for her campaign, she received them in trust. It was contrary to her authority to deposit such funds in her personal account and then use those funds for her own benefit. This was all done without consent, as Lewis was legally proscribed from engaging in such behavior and forbidden statutorily from making any personal disbursements.

### 5. Inderjeet Dhillon Check

On November 5, 2018, Lewis received a check from Inderjeet Dhillon in the amount of \$500.00. While the check was payable to Chantia Lewis, the memo line noted that the check was for fundraising:

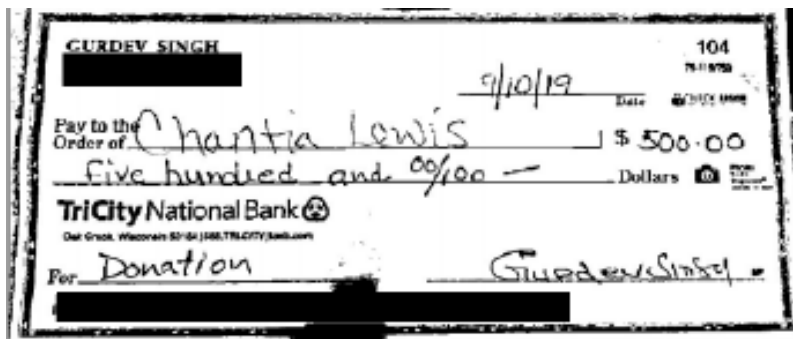


Further, Complainant interviewed Inderjeet Dhillon, who stated that this check was written for campaign purposes, not a personal gift to Lewis. Despite being written for the campaign, Lewis failed to list this contribution on her January 2019 Continuing CFR. There was no corresponding deposit of this check into Lewis campaign account. On or about November 5, 2018, Lewis deposited this campaign contribution into her personal USAA account. By November 23, 2018, Lewis's USAA account had a zero balance. There were no deposits into Lewis's campaign account between the time the contribution check was deposited into Lewis's personal account and the time her personal account reached a zero balance. There were no deposits from Lewis's personal accounts into her campaign account to pay back the misappropriated contribution check. This demonstrates that the entirety of the campaign funds that were deposited into Lewis's personal account had been misappropriated by November 23, 2018. This further demonstrates that Lewis intentionally took the funds, as absent those funds her personal account would have been overdrawn.

In depositing this contribution check into her personal account and failing to list it on her CFR, Lewis failed to make a full report of all contributions received under Chapter 11. Further, as these funds were intended for her campaign, she received them in trust. It was contrary to her authority to deposit such funds in her personal account and then use those funds for her own benefit. This was all done without consent, as Lewis was legally proscribed from engaging in such behavior and forbidden statutorily from making any personal disbursements.

#### 6. Gurdev Singh Check

On September 10, 2019, Lewis received a check from Gurdev Singh in the amount of \$500.00. Singh lived at 7823 North 53<sup>rd</sup> Street, in the City and County of Milwaukee. While the check was payable to Chantia Lewis, the memo line noted that the check was a donation.



Further, Complainant interviewed Gurdev Singh, who stated that this check was written for campaign purposes, not a personal gift to Lewis. Despite being written for the campaign, Lewis failed to list this contribution on her January 2020 Continuing CFR. There was no corresponding deposit of this check into Lewis campaign account. On or about September 11, 2019, Lewis deposited this campaign contribution into her personal USAA account. Prior to that deposit, Lewis's personal account balance was \$133.17. By September 27, 2019, Lewis's USAA account had a balance of \$29.02. There were no deposits into Lewis's campaign account between the time the contribution check was deposited into Lewis's personal account and the time her personal account reached \$29.02. There were no deposits from Lewis's personal accounts into her campaign account to pay back the misappropriated contribution check. This demonstrates that the entirety of the campaign funds that were deposited into Lewis's personal account had been misappropriated by September 27, 2019. This further demonstrates that Lewis intentionally took the funds, as absent those funds her personal account would have been overdrawn.

In depositing this contribution check into her personal account and failing to list it on her CFR, Lewis failed to make a full report of all contributions received under Chapter 11. Further, as these funds were intended for her campaign, she received them in trust. It was contrary to her authority to deposit such funds in her personal account and then use those funds for her own benefit. This was all done without consent, as Lewis was legally proscribed from engaging in such behavior and forbidden statutorily from making any personal disbursements.

#### 7. Wisconsin People Conference, AFSCME Council 32 Check

On February 20, 2020, a check was written by the AFSCME Council to Chantia 4 Progress in the amount of \$775.00. The memo line on this check was blank.



Chantia 4 Progress is Lewis's campaign depository account, indicating that the purposes behind this check was for campaign purposes. Further, Lewis listed this contribution on her July 2020 CFR with a date of March 23, 2020:

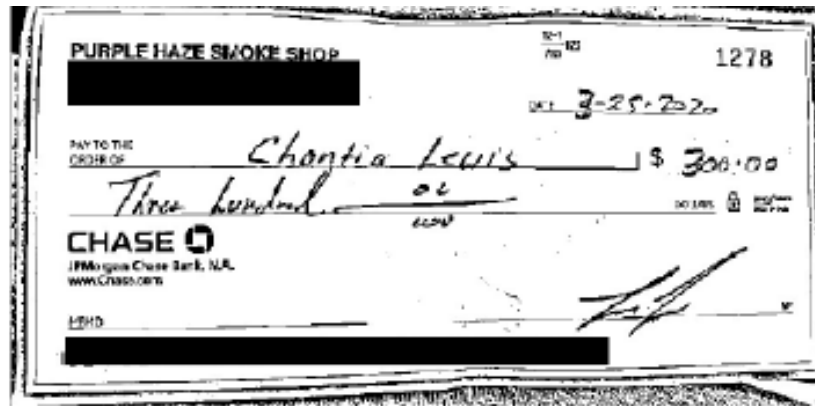
DATE	COMMITTEE NAME	Ethics ID#	ADDRESS	CITY	ST	ZIP	AMOUNT
03/23/20	AFSME			Milwaukee	WI	53207	\$775

This further provides support that this was a campaign contribution and thus belonged to the campaign. Despite that, there was no corresponding deposit of this check into Lewis's campaign account. On June 5, 2020, Lewis deposited that check in her personal Educators Credit Union account. Prior to that deposit, Lewis's EDCU account had a balance of \$4.99. By July 11, 2020, Lewis's EDCU account had a balance of \$6.34. There were no deposits into Lewis's campaign account after the contribution check was deposited into Lewis's personal account. There were no deposits from Lewis's personal accounts into her campaign account to pay back the misappropriated contribution check. This demonstrates that the entirety of the campaign funds that were deposited into Lewis's personal account had been misappropriated by July 11, 2020. This further demonstrates that Lewis intentionally took the funds, as absent those funds her personal account would have been overdrawn.

In depositing this contribution check into her personal account while listing it on her CFR, Lewis failed to make a full report of all contributions received under Chapter 11, as she falsely certified that money was deposited into her campaign account when it was not. Further, as these funds were intended for her campaign, she received them in trust. It was contrary to her authority to deposit such funds in her personal account and then use those funds for her own benefit. This was all done without consent, as Lewis was legally proscribed from engaging in such behavior and forbidden statutorily from making any personal disbursements.

## 8. Purple Haze Smoke Shop Check

On March 25, 2020, Lewis received a check from the Purple Haze Smoke Shop, which is owned by Farooqui, in the amount of \$300.00. This business was located at 1653 North Farwell Avenue, in the City and County of Milwaukee. The check was payable to Chantia Lewis and the memo line was blank:

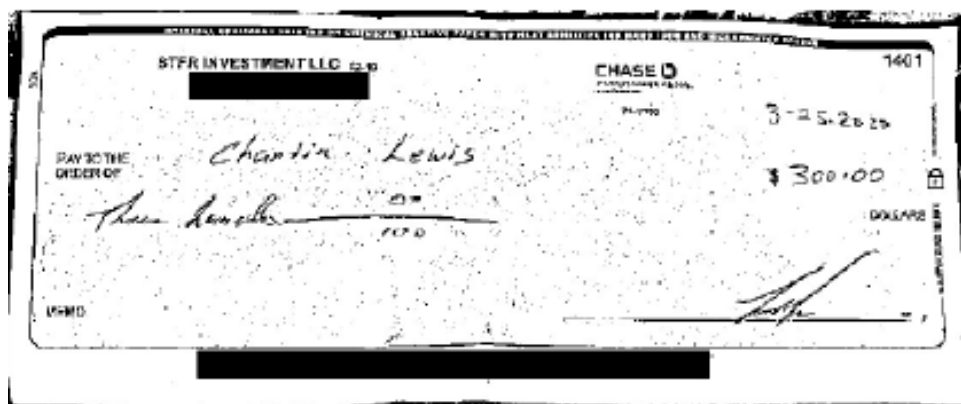


Despite the lack of a memo entry, it is clear this check was intended for a campaign contribution. Complainant interviewed Farooqui, who stated that this check was written for campaign purposes. It was not a personal gift to Lewis. He stated that he had been contacted by Lewis via phone or text that she was collecting for her campaign and thus presented a check for the campaign. Despite being written for the campaign, Lewis failed to list this contribution on her July 2020 Continuing CFR. There was no corresponding deposit of this check into Lewis campaign account. On or about March 25, 2020, Lewis deposited this campaign contribution into her personal USAA account. By April 10, 2020, Lewis's USAA account balance was \$0.22. There were no deposits into Lewis's campaign account between the time the contribution check was deposited into Lewis's personal account and the time her personal account reached a zero balance. There were no deposits from Lewis's personal accounts into her campaign account to pay back the misappropriated contribution check. This demonstrates that the entirety of the campaign funds that were deposited into Lewis's personal account had been misappropriated by April 10, 2020. This further demonstrates that Lewis intentionally took the funds, as absent those funds her personal account would have been overdrawn.

In depositing this contribution check into her personal account and failing to list it on her CFR, Lewis failed to make a full report of all contributions received under Chapter 11. Further, as these funds were intended for her campaign, she received them in trust. It was contrary to her authority to deposit such funds in her personal account and then use those funds for her own benefit. This was all done without consent, as Lewis was legally proscribed from engaging in such behavior and forbidden statutorily from making any personal disbursements.

#### 9. STFR Investment LLC Check

On March 25, 2020, Lewis received a check from STFR Investment LLC, which is owned by Rebhi Kayed, in the amount of \$300.00. This business was located at 9026 West Brown Deer Road, in the City and County of Milwaukee. The check was payable to Chantia Lewis and the memo line was blank:



Despite the lack of a memo entry, it is clear this check was intended for a campaign contribution. Complainant interviewed Rebhi Kayed, who stated that this check was written for campaign purposes. It was not a personal gift to Lewis.

Despite being written for the campaign, Lewis failed to list this contribution on her July 2020 Continuing CFR. There was no corresponding deposit of this check into Lewis campaign account. On or about March 25, 2020, Lewis deposited this campaign contribution into her personal USAA account. By April 10, 2020, Lewis's USAA account balance was \$0.22. There were no deposits into Lewis's campaign account between the time the contribution check was deposited into Lewis's personal account and the time her personal account reached a zero balance. There were no deposits from Lewis's personal accounts into her campaign account to pay back the misappropriated contribution check. This demonstrates that the entirety of the campaign funds that were deposited into Lewis's personal account had been misappropriated by April 10, 2020. This further demonstrates that Lewis intentionally took the funds, as absent those funds her personal account would have been overdrawn.

In depositing this contribution check into her personal account and failing to list it on her CFR, Lewis failed to make a full report of all contributions received under Chapter 11. Further, as these funds were intended for her campaign, she received them in trust. It was contrary to her authority to deposit such funds in her personal account and then use those funds for her own benefit. This was all done without consent, as Lewis was legally proscribed from engaging in such behavior and forbidden statutorily from making any personal disbursements.

#### Total Misappropriation of Campaign Contribution Checks

Lewis received campaign contributions on behalf of her campaign. She held those funds in trust for her campaign. Despite that, she deposited those checks into her personal accounts and used those funds for her own benefit. This was contrary to her authority and without the campaign's consent. As a result of Lewis's misappropriation, the following amounts where lost:

Check Dated	Amount	Pay to the Order Of	Memo Line	Where Deposited	When Deposited	Listed on the CFR
04/15/16	\$50.00	Chantia Lewis	Campaign	Personal USAA Acct	04/18/18	No
04/06/17	\$100.00	Chantia Lewis	Fundraising	Personal USAA Acct	05/11/18	Yes



08/05/17	\$100.00	Chantia Lewis	Donation	Personal USAA Acct	08/11/17	Yes
08/05/17	\$100.00	Chantia Lewis	[Blank]	Personal USAA Acct	08/11/17	Yes
11/05/18	\$500.00	Chantia Lewis	Fundraising	Personal USAA Acct	11/05/18	No
09/10/19	\$500.00	Chantia Lewis	Donation	Personal USAA Acct	09/11/19	No
02/20/20	\$775.00	Lewis, Chantia 4 Progress	[Blank]	Personal EDCU Acct	06/05/20	Yes
03/25/20	\$300.00	Chantia Lewis	[Blank]	Personal USAA Acct	03/25/20	No
03/25/20	\$300.00	Chantia Lewis	[Blank]	Personal USAA Acct	03/25/20	No
<b>Total:</b>	<b>\$2,725.00</b>					

Each of the contributions discussed above was intended to be a transfer of money to the Chantia 4 Progress campaign account. Complainant confirmed by speaking with the check-writers that these checks were for the purposes of the campaign and not personal gifts to Lewis. By receiving contributions and failing to document them on her CFR, Lewis failed to make a full report of all contributions received by her campaign. She misappropriated the contributions. In addition to the unreported funds misappropriated, by documenting funds on her CFR, but then depositing the funds into her personal accounts and spending the money, Lewis intentionally used the campaign's money contrary to her authority and with the intent to convert it to her own use. This was all done without consent, as Lewis was legally proscribed from engaging in such behavior and forbidden statutorily from making any personal disbursements. See WIS. STAT. § 11.1208(2)(a). Further, by failing to list on her CFR the contributions she received, Lewis did intentionally fail to make a full report of all contributions in violation of § 11.0204(1)(a).

#### **LEWIS PAID FOR PERSONAL EXPENSES WITH MISAPPROPRIATED CAMPAIGN FUNDS**

As a candidate for public office, Lewis had unfettered access to her campaign depository account. The funds in this account belonged to the campaign; they were not Lewis's personal property. She held those funds in trust for the campaign and only possessed them by virtue of her role as trustee for the campaign funds. Once funds were under Lewis's control, at that point they were considered received by the campaign and were campaign property. See WIS. STAT. § 11.0103(2)(a)(1). Any funds in the campaign account were only for use for campaign purposes.

Despite that, on multiple occasions Lewis used campaign funds to pay for personal expenses. Lewis intentionally received money from her campaign account when she used campaign funds to pay for trips, car care, credit cards, and other expenses. These constituted disbursements made, as they were expenditures from the campaign's depository account. These disbursements were contrary to law, as a campaign may not make a disbursement for an individual's personal use. See WIS. STAT. §

11.1208(2)(a). All of the transactions below were done in excess of her authority. As she was statutorily prohibited from making any disbursements for personal benefits, these transactions were all without consent. Complainant reviewed Lewis's campaign and personal depository accounts, as well as subpoenaed records from multiple businesses to form the basis of knowledge for the below investigation.

### **Fraudulent Campaign Fund Use Related to Travel**

#### **1. November of 2016 – Family Trip to Georgia**

In November of 2016, Lewis went on a family trip to Marietta, Georgia. While there, she used funds from her campaign account to finance her trip.

11/25	Withdrawal Debit Card 11/23 632923258006 5541 PILOT 00006536 HEBRON IN	37.42-
11/28	Withdrawal Debit Card 11/26 633123200488 5812 WAFFLE HOUSE 2050 SANDY SPRINGS GA	45.34-
11/28	Withdrawal Debit Card 11/27 633326200488 5814 CHIPOTLE 1464 MARIETTA GA	41.18-
11/28	Withdrawal Debit Card 11/27 633228000654 7278 LIVINGSOCIAL* 202-400-2100 DC	41.99-
11/29	Withdrawal Debit Card 11/27 633321100256 7999 X-DRENALINE MARIETTA GA	6.33-
11/30	Withdrawal Debit Card 11/28 633424500476 5814 WENDYS #45 MARIETTA GA	24.13-
11/30 11/29	Withdrawal at ATM #700291 CHASE 3615 SANDY PLAINS R MARIETTA GA	203.00-

Some of these expenses she falsely listed on her CFR as campaign expenditures; others she did not include at all. There is no documentary support for any of these expenses being related to the campaign. There is no reason that a local public official who deals solely with City of Milwaukee issues would need to campaign in Georgia, approximately 800 miles away.

Based on the nature of some of these expenses (i.e. a trampoline park, ATM withdrawals), there is no way these could be considered as campaign related expenses. As part of Complainant's investigation, records were received from Facebook via warrant. Those records show that on November 29, 2016, Lewis was posting pictures with her family in Marietta, Georgia. This further supports the position that this was a family trip and not campaign business. In total, Lewis misappropriated \$399.39 in campaign funds to fund her personal travel and expenses in Georgia.

#### **2. August of 2017 – Family Trip to Wisconsin Dells**

In August of 2017, Lewis went on a family trip to Wisconsin Dells. While there, she used funds from her campaign account to finance her trip. The below documents the different expenses she used campaign funds to finance:

Chantia A Lewis, DOB: 01/05/1980

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08/26	Withdrawal at ATM #632482 Outlets At The Dells 1 210 GASSER RD WISCONSIN DEL WI	203.00-	1094.75
08/26	Withdrawal at ATM #633535 Outlets At The Dells 1 210 GASSER RD WISCONSIN DEL WI	203.00-	891.75
08/26	Withdrawal at ATM #634495 Outlets At The Dells 1 210 GASSER RD WISCONSIN DEL WI	103.00-	788.75
08/28	Withdrawal Debit Card 08/25 723823200888 7011 MT. OLYMPUS RESORTS WISCONSIN DEL WI	56.08-	732.67
08/28	Withdrawal Debit Card 08/26 723925200188 7994 MT. OLYMPUS ARCADE WISCONSIN DEL WI	30.00-	702.67
08/28	Withdrawal Debit Card 08/26 723928200588 5812 MT OLYMPUS CONCESSIONS WISCONSIN DEL WI	36.65-	666.02
08/28	Withdrawal Debit Card 08/26 723924286188 7996 MT OLYMPUS WATER & THEME WISC DELLS WI	26.70-	639.32
08/28	Withdrawal Debit Card 08/26 723925100542 7996 KNUCKLEHEADS WISCONSIN WISCONSIN DEL WI	29.46-	609.86

None of these expenses were listed on Lewis's CFR. There is no documentary support for any of these expenses being related to the campaign. There is no reason that a local public official who deals solely with City of Milwaukee issues would need to expend campaign funds at Mt. Olympus Resort or the arcade there. Further, as part of Complainant's investigation, records were received from Facebook via warrant. Those records show that on August 27, 2017, Lewis posted a picture of herself and her family at Mt. Olympus amusement park, in Lake Delton, Wisconsin. This further supports the position that this was a family trip and not campaign business. In total, Lewis misappropriated \$687.89 of campaign funds to finance her trip to Wisconsin Dells.

### 3. May of 2018 – City Travel to Las Vegas

Lewis travelled to Las Vegas, Nevada, from May 19, 2018, through May 23, 2018, to attend the ICSC RECon Conference of 2018. This was approved City of Milwaukee travel to which Lewis would qualify for reimbursement under City of Milwaukee Ordinance § 350-181(6). As noted by §350-181(6), reimbursement is allowed for those actual expenses directly related to the employee's job-related travel. This complaint previously discussed certain double-dipping Lewis engaged in during this trip, where she claimed reimbursement from the City for expenses paid by her campaign. The resort fees discussed in this section were not reimbursed by the City of Milwaukee, and thus are a pure theft from the campaign.

As part of her travel to Las Vegas, Lewis incurred certain resort fees at the New York New York Las Vegas Hotel & Casino. These fees were not included in her initial booking and thus were not part of her City reimbursement.

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Chantia Lewis  
7013 W Green Brook Ct.  
Milwaukee, WI 53223

Room No. 2327  
Conf No. 779073524  
Arrival 05/19/18  
Departure 05/23/18

DATE	DESCRIPTION	CHARGES	CREDITS
05/19/18	Visa XXXXXXXXXXXX6344 XX/XX		167.80
05/19/18	***DNU***Resort Fee	37.00	
05/19/18	***DNU***Resort Fee Tax	4.95	
05/20/18	***DNU***Resort Fee	37.00	
05/20/18	***DNU***Resort Fee Tax	4.95	
05/21/18	***DNU***Resort Fee	37.00	
05/21/18	***DNU***Resort Fee Tax	4.95	
05/22/18	***DNU***Resort Fee	37.00	
05/22/18	***DNU***Resort Fee Tax	4.95	
<b>Total</b>		<b>167.80</b>	<b>167.80</b>

Lewis used her campaign depository account to pay for those fees:

05/21 Withdrawal Debit Card 167.80-  
05/19 814020698960 3774 NYNY - FRONT DESK LAS VEGAS NV

Lewis then listed these fees on her CFR as "Travel/Convention Fees." This resort stay was solely related to City of Milwaukee approved travel for City of Milwaukee approved business. This was not a campaign event and no campaign expenses would have been incurred. By listing these fees on her CFR and using campaign funds to pay for them, Lewis misappropriated those funds.

#### 4. February of 2020 – Worship Conference in Orlando

In February of 2020, Lewis went on a trip to Orlando, Florida. Complainant reviewed records received via warrant from Facebook. Those records reflect that Lewis traveled to Orlando for a worship conference at the Deeper Fellowship Church.

**Page** Orlando, Florida (108288992526695)  
**Author** Chantia Lewis (1780263085)  
**Id** 10213782550036205  
**Time** 2020-02-26 21:19:45 UTC  
**Message** Getting started... worship conference at Pastor William McDowell's church.

This trip was for personal reasons and not related to campaign business. While in Florida, Lewis used campaign funds to finance her expenses. The below records show the different expenses she used campaign funds to pay:

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02/26	Withdrawal Debit Card	27.15-
	02/26 005700832056 5411 WM SUPERCENTER Wal-Mart Super Cen ORLANDO	
02/27	Withdrawal Debit Card	58.44-
	02/26 005778069389 7011 LAKES ORLANDO FL	
02/27	Withdrawal Debit Card	45.00-
	02/26 005709015308 8661 SQ *DEEPER FELLOWSHIP Orlando FL	
02/27	Withdrawal Debit Card	53.88-
	02/26 005743694592 5812 TGI FRIDAYS 2633 ORLANDO FL	
02/27	Withdrawal Debit Card	37.26-
	02/26 005703452986 5812 WAFFLE HOUSE 2350 ORLANDO FL	
02/28	Withdrawal Debit Card	24.55-
	02/27 005859312602 5812 WAFFLE HOUSE 2350 ORLANDO FL	
02/28	Withdrawal Debit Card	18.30-
	02/26 005778261228 5814 MCDONALDS F23547 ORLANDO FL	
02/29	Withdrawal Debit Card	46.25-
	02/27 005872393188 5812 APPLEBEES 139 64677602 ORLANDO FL	

None of these expenditures were listed on Lewis's CFRs. There is no documentary support for any of these expenses being related to the campaign. There is no reason that a local public official who deals solely with City of Milwaukee issues would need to expend campaign funds at a worship conference in Orlando, Florida. Further, Lewis's Facebook postings reflect that this conference was regarding worship and religious matters, not campaign matters. This further supports the position that this was a personal trip and not campaign business. In total, Lewis misappropriated \$310.83 from her campaign account on this trip.

### **Fraudulent Campaign Fund Use at EF Explore America<sup>10</sup> and Other Withdrawals**

On April 6, 2019, Lewis withdrew \$3,182 from her campaign depository account. This withdrawal was not listed on her CFR. She then deposited that money into her personal Educators Credit Union (EDCU) account. At the time of the deposit, Lewis's personal account had \$818.99 in it. After the deposit, she immediately made multiple withdrawals, including ATM withdrawals on April 6 and April 13 at the EDCU located at 10811 West Park Place, in the City and County of Milwaukee. Also, Lewis made a debit card payment to Explore America on April 9, 2019, in the amount of \$500. A review of records received via subpoena from Explore America showed an invoice from June 19, 2019, listing a payment due from April 7, 2019, in the amount of \$500. The invoice was addressed to Chantia Lewis. The traveler listed was Lewis's child, JDL. This further demonstrates that this expense was not campaign-related, but a personal expense. By April 13, 2021, the balance on Lewis's personal EDCU account was 18.99. There were no legitimate deposits into Lewis's account after the deposit of the misappropriated campaign funds. As such, she had misappropriated the entire amount of campaign funds she deposited into her account.

On April 9, 2019, Lewis made a debit card payment from her campaign account to Explore America. This payment was in the amount of \$523. The expenditure was not listed on her CFR. A review of records received via subpoena from Explore America showed an invoice from June 19, 2019, listing a payment due from April 7, 2019, in the amount of \$523. The invoice was addressed to Chantia Lewis. The traveler listed was Lewis's child, JDL. Paying a monies for education travel for a student is not related to campaign expenses and thus any disbursements for such would be a misappropriation of campaign funds. This further demonstrates that this expense was not campaign-related, but a personal expense.

<sup>10</sup> EF Explore America is a program that arranges travel and designs tours to help educators teach and student to promote learning more about different cultures and environments through travel. See <https://www.efexploreamerica.com/our-story>. This is not an expense that should be paid using campaign funds, as it has no relationship with campaign expenses.



In total, Lewis misappropriated \$3,705 on April 6, 2019, and April 9, 2019.

**Fraudulent Campaign Fund Use at Eagle Management RE, LLC<sup>11</sup>**

On January 13, 2020, Lewis signed a lease to rent an apartment at 7025 West Hummingbird Ct, in the City and County of Milwaukee. The management agent for that lease was Eagle Management RE, LLC.

On January 13, 2020, Lewis withdrew \$4,200.13 from her campaign account and received a cashier's check payable to Eagle Management. This expenditure was not listed on her CFR. The below receipt shows a check was disbursed from her campaign account in the amount of \$4,200.13.

EDUCATORS CREDIT UNION  
PARK PLACE OFFICE  
10811 W PARK PLACE  
MILWAUKEE WI 53225-3618  
Inquiries Call: 262-886-5900

Acct XXXXXX871 CHANTIA 4 PROGRE  
Eff: 01/13/20 Date: 01/13/20  
Tlr: 0081 10:46am  
Served by: ZEREK  
Doc Number: 27321259

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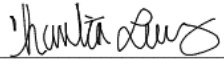
Deposit to NON PROFIT CHECKING 08  
Prev Bal: 193.67  
Amount: 4,609.32  
New Bal: 4,802.99  
Seq: #687278

Withdraw from NON PROFIT CHECKING 08  
Prev Bal: 4,802.99  
Amount: 4,200.13  
New Bal: 602.86  
Seq: #687279

Acct XXXXXX871  
Avail Bal S08 602.86

---

Check Received	100.00
Check Received	500.00
Check Received	500.00
Check Received	500.00
Check Received	1,500.00
Check Received	48.02
Check Received	187.29
Check Received	24.01
Check Received	500.00
Cash Received	750.00
Check Disbursed	-4,200.13
Ref number:	00 3209542



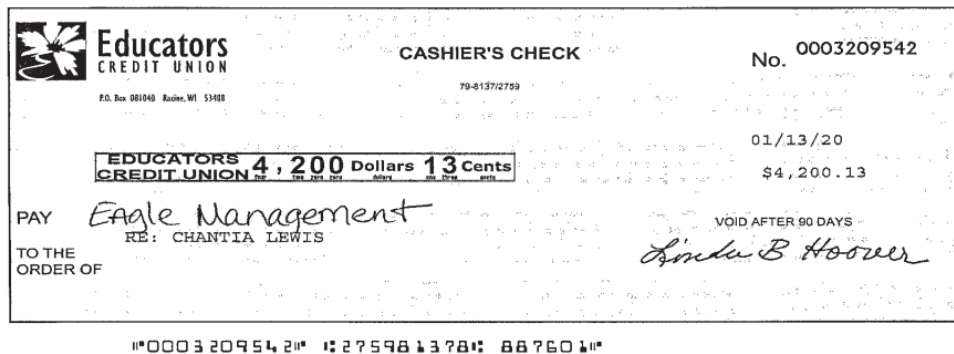
Authorized by

ID Source:  
☒ Driver's License

A copy of the check is shown below. Complainant notes that the cashier's check number corresponds exactly with the reference number of the check that was disbursed from Lewis's campaign account.

<sup>11</sup> Eagle Management RE, LLC is a property management company that manages residential properties in Illinois and in Milwaukee.

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Lewis then used those campaign funds to make a payment to Eagle Management on January 13, 2020. A review of records received via subpoena from Eagle Management shows a payment was received from Lewis on January 13, 2020, in the amount of \$4,200.13. Paying a monies for a personal apartment is not related to campaign expenses and thus any disbursements for such monies would be a misappropriation of campaign funds. Based on the fact that Eagle Management manages personal residential properties and that Lewis made this payment the same day she signed a lease to rent an apartment from Eagle Management, this further demonstrates that this expense was not campaign-related, but a personal expense.

On February 5, 2020, Lewis made two \$500 ATM withdrawals from her personal USAA account. She then withdrew \$684 from her campaign depository account. This expenditure was not recorded on her CFR.

| 02/05

Withdrawal by Check

684.00-

33.93

Lewis then proceeded to combine the \$1,000 she withdrew from her personal account with the \$684 she withdrew from her campaign account. She then had a cashier's check issued. The below receipt shows a check was disbursed from her campaign account in the amount of \$1,684.

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EDUCATORS CREDIT UNION  
PARK PLACE OFFICE  
10811 W PARK PLACE  
MILWAUKEE WI 53225-3618  
Inquiries Call: 262-886-5900

Acct XXXXXX871      CHANTIA 4 PROGRE  
Eff: 02/05/20      Date: 02/05/20  
Tlr: 0089      6:00pm  
Served by: C  
Doc Number: 27460460

Withdraw from NON PROFIT CHECKING 08  
Prev Bal: 717.93  
Amount: 684.00  
New Bal: 33.93  
Seq: 1406601

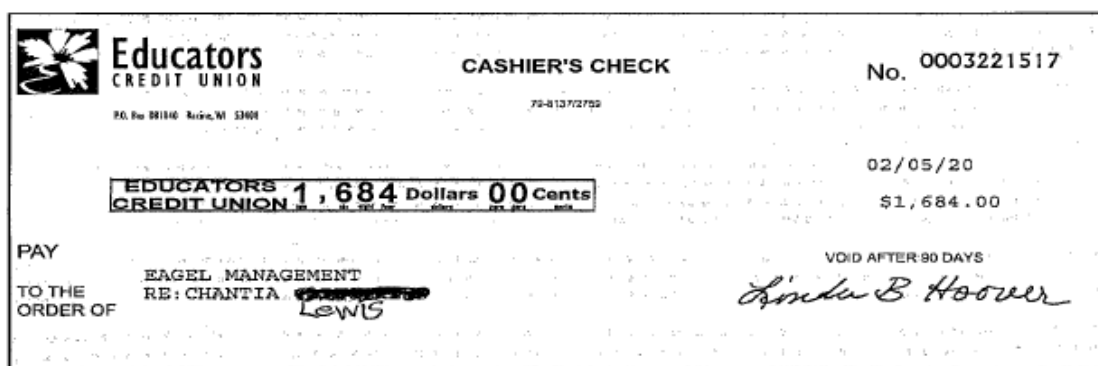
Acct XXXXXX871  
Avail Bal S08 33.93

Check Disbursed -1,684.00  
EAGEL MANAGEMENT  
Ref number: 00 3221517  
Cash Received 1,000.00  
Twenties Received 1,000.00

Authorized by

ID Source:  
☐ Driver's License  
☒ Synergy  
☐ Known

A copy of the check is shown below. As above, this check was payable to Eagel (sic) Management. Complainant notes that the cashier's check number corresponds exactly with the reference number of the check that was disbursed from Lewis's campaign account.



Complainant notes that the rental agreement with Eagle Management listed Lewis's rent as \$1,684. The agreement notes that rent is due by the fifth day of the month. As such, this cashier's check matches exactly the amount of a rental payment and the date the payment would be due. Paying a rent for a personal apartment is not related to campaign expenses and thus any disbursements for such rent would be a misappropriation of campaign funds. Based on the fact that Eagle Management manages personal residential properties and that Lewis made this payment the same day that her rent

was due and in the same amount, this further demonstrates that this expense was not campaign-related, but a personal expense.

In total, Lewis misappropriated \$4,884.13 of campaign funds that she put towards payments to Eagle Management.

### **Fraudulent Campaign Fund Use for Other Personal Expenses**

#### **1. August 2017 Payment to Matt's Foreign Car Specialists**

On August 17, 2017, Lewis withdrew via debit card \$528.02 from her campaign depository account. This expenditure was not listed on her CFR. The withdrawal was listed as going to Matt's Foreign Car Specialists, which is located at 5519 W Vliet St, in the City and County of Milwaukee.

```
08/17      Withdrawal Debit Card      528.02-   1054.61
08/16 722823003233 7538 MATTS FOREIGN CAR SPECIAL MILWAUKEE WI
```

Matt's Foreign Car Specialists is a car repair business, focusing on servicing foreign vehicles. There is no reason any campaign expenditures would go to such a business. Further, Lewis made a previous payment to Matt's Foreign Car Specialists on June 29, 2017, from her personal USAA bank account in the amount of \$1,633.07. Complainant notes that, at the time Lewis used campaign funds to pay her car expenses, the balance on all of her personal USAA accounts totaled over \$190.36. This shows that, but for Lewis misappropriating campaign funds, she would not have been able to pay this expense. This provides further evidence that the payment made from the campaign account was a misappropriation of campaign funds to pay a personal expense.

#### **2. February 2018 Payment to Agape Love Bible College**

On February 17, 2018, Lewis withdrew via debit card \$252.75 from her campaign depository account. This expenditure was not listed on her CFR. The withdrawal was listed as going to Agape Love Bible College.

```
02/20      Withdrawal Debit Card      252.75-   871.49
02/17 804827100534 8299 SQ *AGAPE LOVE BIBLE COLL Milwaukee WI
```

Agape Love Bible College, located at 4716 West Lisbon Ave, in the City and County of Milwaukee, is an educational institute focused on training in theological and divinity studies. Records received via subpoena from Agape Love Bible College reflected that on February 17, 2018, a payment was received, bearing Lewis's signature, in the amount of \$252.75. These records further demonstrate that the payments were specifically for tuition. Tuition at an education institute is not related to campaign expenses and thus any disbursements for such tuition would be a misappropriation of campaign funds.

Complainant further notes that, at the time of this disbursement, the balance on all of Lewis's personal USAA accounts totaled only \$73.69. This shows that, but for Lewis misappropriating campaign funds, she would not have been able to pay this expense. This further demonstrates that Lewis intentionally took the funds to pay a personal expense due to her lack of personal funds to cover the expense.

### 3. July 2018 Payments on Personal USAA Credit Card

On July 19, 2018, and July 24, 2018, Lewis withdrew funds via ACH withdrawal<sup>12</sup> in the amounts of \$176.68 and \$242.85. The withdrawals were used as payments on a USAA credit card. These expenditures were not listed on Lewis's CFR.

07/19	Withdrawal ACH USAA.COM PAYMNT TYPE: CREDIT CRD CO: USAA.COM PAYMNT	176.68-	2673.76
07/24	Withdrawal ACH USAA.COM PAYMNT TYPE: CREDIT CRD CO: USAA.COM PAYMNT	242.85-	562.69

Records received via subpoena from USAA reflected that, in the past, Lewis had made these payments from her personal USAA account. A review of Lewis's personal USAA credit card records shows that on July 16, 2018, there was a payment made in the amount of \$176.68. On July 22, 2018, there was a payment made in the amount of \$242.85. The fact these withdrawals and payment occurred at nearly the same time and in the exact same amount shows that Lewis used her campaign account to pay her personal USAA credit card. There were no receipts to support that these payments were expenses for the campaign. There was no documentation to show these were any kind of reimbursement. No reimbursement checks for these charges were ever issued. There was nothing on Lewis's CFR to support that these charges related in any way to campaign expenses.

Complainant further notes that, at the time of these charges, the balance on Lewis's USAA accounts on July 17, 2018, was overdrawn at -\$1,136.49. This indicates that, but for misappropriating campaign funds, Lewis would not have been able to pay this expense. This further demonstrates that Lewis intentionally took the funds to pay a personal expense due to her lack of personal funds to cover the expense. As to the July 24, 2018, charge, the misappropriation is shown by the lack of any legitimate campaign need for the expense, the fact that these charges were historically drawn from Lewis's personal account, and the fact that there was no documentary support for the charge.

### 4. July 2018 Payment to GM Financial

On July 21, 2018, Lewis withdrew \$2,045.50 from her campaign depository account. The withdrawal was listed as a Bill Payment for GM Financial. This expenditure was not listed on Lewis's CFR. Records received via subpoena from GM Financial reflected that on July 21, 2018, Lewis made a payment of \$2,038 to GM financial to reinstate her vehicle loan. The below documents the breakdown of how the payment was assessed:

07/21/18	Fee Payment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$100.00	\$100.00
07/21/18	Fee Payment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$410.00	\$410.00
07/21/18	Late Fee Payment	\$0.00	\$0.00	\$0.00	\$80.00	\$0.00	\$0.00	\$80.00
07/21/18	Payment	\$1,167.37	\$280.63	\$0.00	\$0.00	\$0.00	\$0.00	\$1,448.00

In addition, a fee of \$7.50 was also included. As such, Lewis in total made a payment of \$2,045.50, which was derived directly from campaign funds.

Jul 21, 2018 10:44 AM	etlbatch	111003906056	WU Notification	DeskXFR-Payment submitted by customer using DeskXFR/ATM : DT: 2018-07-21 00:00: 00 AMT: 2038 CONF #: 85409742 FEE AMT: 7.5
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<sup>12</sup> ACH withdrawals are electronic money transfers directly from one bank to another via the Automated Clear House Network. See <https://www.investopedia.com/ach-transfers-what-are-they-and-how-do-they-work-4590120>.



Paying a personal car loan is not related to campaign expenses and thus any disbursements for such loan would be a misappropriation of campaign funds. At the time of this payment, Lewis's personal USAA account had a balance of \$5.04, indicating that, but for misappropriating campaign funds, Lewis would not have been able to pay this expense. This demonstrates that Lewis intentionally took the funds to pay a personal expense due to her lack of personal funds to cover the expense.

In total, Lewis misappropriated \$3,299.80 in campaign funds through miscellaneous personal expenses.

#### Total Misappropriation of Campaign Funds on Personal Expenses

These are not all the instances of Lewis misappropriation of campaign funds, but only illustrative of her actions. Lewis held funds in trust for her campaign. Despite that, she abused that trust and her authority by spending campaign funds for purely personal expenses. This was contrary to her authority and without the campaign's consent. The below chart details the different occasions where Lewis misappropriated campaign funds and the personal use those funds went to.

Date	Amount	Use
11/24/16	\$399.39	Family Trip to Georgia
08/17/17	\$528.02	Matt's Foreign Car Specialists
08/25/17	\$687.89	Family Trip to Wisconsin Dells
02/17/18	\$252.75	Agape Love Bible College
05/21/18	\$167.80	NY NY Hotel
07/19/18	\$176.68	USAA Credit Card
07/21/18	\$2,045.50	GM Financial
07/24/18	\$242.85	USAA Credit Card
04/06/19	\$3,182.00	Withdrawals and Explore America
04/09/19	\$523.00	Explore America
01/13/20	\$4,200.13	Eagle Management
02/05/20	\$684.00	Eagle Management
02/26/20	\$310.83	Trip to Florida
<b>Total:</b>	<b>\$13,400.84</b>	

By using campaign funds for personal expenses, Lewis was receiving disbursements from her campaign's depository account.<sup>13</sup> These disbursements came from the campaign depository account and were of value, as they were financial payments used to pay Lewis's personal obligations. Lewis intentionally used this money to pay her expenses. Further, Lewis failed to make any record of these disbursements for personal expenses in the CFRs. None of the above-mentioned payments for personal expenses was reported. Lewis only had possession of those funds due to her role as trustee to the campaign. Her use of the funds was contrary to her authority and with the intent to be used for personal gain. This was all done without consent, as Lewis was legally proscribed from engaging in such behavior and forbidden statutorily from making any personal disbursements. See WIS. STAT. § 11.1208(2)(a).

<sup>13</sup> Disbursements include any "expenditure by a committee from the committee's depository account." WIS. STAT. 11.0101(10)(a)(1).

### **Lewis Repeatedly Filed False Campaign Finance Reports**

Complainant obtained copies of Lewis CFRs from 2016 until 2020. Complainant compared Lewis's CFRs against her Educators Credit Union campaign depository account. This comparison showed that Lewis habitually filed false CFRs. She entered false information for the starting and ending cash balances on numerous reports. She also failed to include contributions and disbursements on many occasions. In addition, Lewis's CFRs show that she structured a campaign contribution to avoid the statutory contribution limits. Complainant searched all CFRs from the January 2017 Continuing Report until the July 2020 Continuing Report. In addition to filing inaccurate CFRs, Lewis consistently filed her CFRs late, as statutorily they are required to be filed by the "last day of the immediately preceding month in the case of a continuing report . . . ." Wis. STAT. §11.0103(3)(a)(2). If a CFR is accurately reporting all financial transactions, the ending cash balance for a reporting period should always be the same for the starting balance for the succeeding period.

For each of the CFRs discussed below, Lewis submitted a false report to the Elections Commission, which is the designated filing officer under Wis. Stat § 11.0101(10)(14). All of the false balances reported involves figures and discrepancies in excess of \$100.

#### **January 2017 Continuing Report**

Lewis filed a January 2017 Continuing CFR with the Elections Commission, 200 East Wells Street, in the City and County of Milwaukee. The CFR is dated January 17, 2016. Complainant believes this to be a typographical mistake and the correct date to be January 17, 2017. This is because all of the contributions and disbursements occurred after January 17, 2016, throughout the second half of 2016. Complainant would also note that Schedule 4 is dated as January 17, 2017, and signed by Lewis's former campaign treasurer, Solana Patterson-Ramos. Lewis electronically signed and certified this CFR as true, correct, and complete. The report covers the time period July 1, 2016 through December 31, 2016.

Complainant compared the cash balance at the beginning and end of this CFR against the actual cash balance from Lewis campaign depository account for the same reporting period. Those comparisons showed that Lewis consistently reported false amounts in her CFRs. The chart below shows the amounts Lewis reported on her CFR in comparison to the actual amount of funds located in her campaign depository account, as well as the discrepancy between those amounts.

	Reported on CFR	Actual Amounts	Discrepancy
Starting Balance	\$455.75	\$79.55	\$376.20
Ending Balance	\$1,584.82	(\$65.94)	\$1,650.76

No documentary support exists to substantiate the numbers Lewis used to report her cash balances. The actual amounts were drawn directly from the depository statements for Lewis's campaign account and thus accurately reflect the true cash on hand at any given moment.

#### **July 2017 Continuing Report**

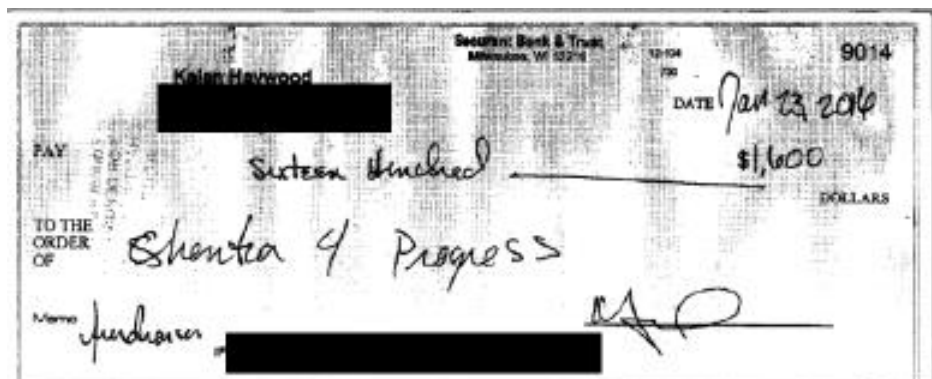
Lewis filed a July 2017 Continuing CFR with the Elections Commission, 200 East Wells Street, in the City and County of Milwaukee. The CFR it dated July 17, 2017. Lewis electronically signed and certified this CFR as true, correct, and complete. The report covers the time period January 1, 2017 through June 30, 2017.

Complainant compared the cash balance at the beginning and end of this CFR against the actual cash balance from Lewis campaign depository account for the same reporting period. Those comparisons showed that Lewis consistently reported false amounts in her CFRs. The chart below shows the amounts Lewis reported on her CFR in comparison to the actual amount of funds located in her campaign depository account, as well as the discrepancy between those amounts.

	Reported on CFR	Actual Amounts	Discrepancy
Starting Balance	\$455.75	(\$65.94)	\$521.69
Ending Balance	\$1,929.44	\$0.00	\$1,929.44

No documentary support exists to substantiate the numbers Lewis used to report her cash balances. The actual amounts were drawn directly from the depository statements for Lewis's campaign account and thus accurately reflect the true cash on hand at any given moment.

In addition, Complainant's investigation revealed that Lewis illegally structured a campaign contribution to avoid the statutory contribution limitations. As noted above, the statutory contribution limit was Aldermanic district 9 was \$816.14. Lewis received a campaign contribution on January 23, 2017.<sup>14</sup> The check was in the amount of \$1,600 from Kalan Haywood. It written to Lewis's campaign depository account, Chantia 4 Progress, and the memo line stated "fundraiser." A copy of the check is below:



The donation of \$1,600 exceeds the statutory limit for campaign donations. Despite that, a review of Lewis's campaign depository account shows a deposit of \$1,600 on January 24, 2017. Lewis did not list this donation on her CFR contributions schedule. Instead, Lewis reported this donation as three separate donations, all totaling \$1,600. Below is a portion of the contribution schedule from Lewis's July 2017 Continuing Report:

DATE	NAME	ADDRESS	CITY	STATE	ZIP	AMOUNT	CITY
01/24/17	Haywood	Kalan	Milwaukee	WI	City of Milwaukee	\$534	\$534
01/24/17	Wade	Mark	Milwaukee	WI	Self Employed	\$533	\$533
01/24/17	Islam	Rashaun	Milwaukee	WI	Self Employed	\$533	\$533

This shows that Lewis split the \$1,600 donation into three separate donations. Complainant reviewed all of the contribution checks going into Lewis's campaign account. There were no contribution checks from anyone with the names of Mark Wade or Rashaun Islam. The only check from Kalan Haywood

<sup>14</sup> The actual check is dated January 23, 2016. However, based on the fact that it was deposited on January 23, 2017, and that the CFR filed in July of 2017 lists the donation from Kalan Haywood as occurring on January 23, 2017, it appears that the 2016 date is a mistake and the court year is 2017. Further, there are no entries for contributions from Kalan Haywood on Lewis 2016 CFRs.

was the check for \$1,600. As such, the only reasonable explanation is that Lewis structured the Haywood donation so as to avoid the statutory reporting requirements, thus providing false information on the contribution schedule of her CFR.

### **January 2018 Continuing Report**

Lewis filed a January 2018 Continuing CFR with the Elections Commission, 200 East Wells Street, in the City and County of Milwaukee. The CFR is dated January 17, 2018. Lewis electronically signed and certified this CFR as true, correct, and complete. The report covers the time period July 1, 2017 through December 31, 2017.

Complainant compared the cash balance at the beginning and end of this CFR against the actual cash balance from Lewis campaign depository account for the same reporting period. Those comparisons showed that Lewis consistently reported false amounts in her CFRs. The chart below shows the amounts Lewis reported on her CFR in comparison to the actual amount of funds located in her campaign depository account, as well as the discrepancy between those amounts.

	Reported on CFR	Actual Amounts	Discrepancy
Starting Balance	\$3,058.51	\$0.00	\$3,058.51
Ending Balance	\$3,752.34	\$22.71	\$3,729.63

No documentary support exists to substantiate the numbers Lewis used to report her cash balances. The actual amounts were drawn directly from the depository statements for Lewis's campaign account and thus accurately reflect the true cash on hand at any given moment.

### **July 2018 Continuing Report**

Lewis filed a July 2018 Continuing CFR with the Elections Commission, 200 East Wells Street, in the City and County of Milwaukee. The CFR is dated July 15, 2018. Lewis electronically signed and certified this CFR as true, correct, and complete. This report covers the time period January 1, 2018 through June 30, 2018.

Complainant compared the cash balance at the beginning and end of this CFR against the actual cash balance from Lewis campaign depository account for the same reporting period. Those comparisons showed that Lewis consistently reported false amounts in her CFRs. The chart below shows the amounts Lewis reported on her CFR in comparison to the actual amount of funds located in her campaign depository account, as well as the discrepancy between those amounts.

	Reported on CFR	Actual Amounts	Discrepancy
Starting Balance	\$3,752.34	\$22.71	\$3,729.63
Ending Balance	\$5,190.04	\$3,356.41	\$1,833.63

No documentary support exists to substantiate the numbers Lewis used to report her cash balances. The actual amounts were drawn directly from the depository statements for Lewis's campaign account and thus accurately reflect the true cash on hand at any given moment.

### **January 2019 Continuing Report**

Lewis filed a January 2019 Continuing CFR with the Elections Commission, 200 East Wells Street, in the City and County of Milwaukee. The CFR is dated January 15, 2019. Lewis electronically signed

and certified this CFR as true, correct, and complete. This report covers the time period July 1, 2018 through December 31, 2018.

Complainant compared the cash balance at the beginning and end of this CFR against the actual cash balance from Lewis campaign depository account for the same reporting period. Those comparisons showed that Lewis consistently reported false amounts in her CFRs. The chart below shows the amounts Lewis reported on her CFR in comparison to the actual amount of funds located in her campaign depository account, as well as the discrepancy between those amounts.

	Reported on CFR	Actual Amounts	Discrepancy
Starting Balance	\$918.32	\$3,356.41	(\$2,438.09)
Ending Balance	\$2,093.32	\$4.32	\$2,089.00

No documentary support exists to substantiate the numbers Lewis used to report her cash balances. The actual amounts were drawn directly from the depository statements for Lewis's campaign account and thus accurately reflect the true cash on hand at any given moment.

### **July 2019 Continuing Report**

Lewis filed a July 2019 Continuing CFR with the Elections Commission, 200 East Wells Street, in the City and County of Milwaukee. The CFR is dated July 24, 2019. Lewis electronically signed and certified this CFR as true, correct, and complete. This report covers the time period January 1, 2019 through June 30, 2019.

Complainant compared the cash balance at the beginning and end of this CFR against the actual cash balance from Lewis campaign depository account for the same reporting period. Those comparisons showed that Lewis consistently reported false amounts in her CFRs. The chart below shows the amounts Lewis reported on her CFR in comparison to the actual amount of funds located in her campaign depository account, as well as the discrepancy between those amounts.

	Reported on CFR	Actual Amounts	Discrepancy
Starting Balance	\$2,093.32	\$4.32	\$2,089.00
Ending Balance	\$3,752.92	\$4,087.34	(\$334.42)

No documentary support exists to substantiate the numbers Lewis used to report her cash balances. The actual amounts were drawn directly from the depository statements for Lewis's campaign account and thus accurately reflect the true cash on hand at any given moment.

### **January 2020 Continuing Report**

Lewis filed a January 2020 Continuing CFR with the Elections Commission, 200 East Wells Street, in the City and County of Milwaukee. The CFR is dated January 20, 2020. Lewis electronically signed and certified this CFR as true, correct, and complete. This report covers the time period July 1, 2019 through December 31, 2019.

Complainant compared the cash balance at the beginning and end of this CFR against the actual cash balance from Lewis campaign depository account for the same reporting period. Those comparisons showed that Lewis consistently reported false amounts in her CFRs. The chart below shows the amounts Lewis reported on her CFR in comparison to the actual amount of funds located in her campaign depository account, as well as the discrepancy between those amounts.



	Reported on CFR	Actual Amounts	Discrepancy
Starting Balance	\$3,752.92	\$4,087.34	(\$334.42)
Ending Balance	\$1,812.84	\$300.90	\$1,639.18

No documentary support exists to substantiate the numbers Lewis used to report her cash balances. The actual amounts were drawn directly from the depository statements for Lewis's campaign account and thus accurately reflect the true cash on hand at any given moment.

### **July 2020 Continuing Report**

Lewis filed a July 2020 Continuing CFR with the Elections Commission, 200 East Wells Street, in the City and County of Milwaukee. The CFR is dated July 14, 2020. Lewis electronically signed and certified this CFR as true, correct, and complete. This report covers the time period January 1, 2020 through June 30, 2020.

Complainant compared the cash balance at the beginning and end of this CFR against the actual cash balance from Lewis campaign depository account for the same reporting period. Those comparisons showed that Lewis consistently reported false amounts in her CFRs. The chart below shows the amounts Lewis reported on her CFR in comparison to the actual amount of funds located in her campaign depository account, as well as the discrepancy between those amounts.

	Reported on CFR	Actual Amounts	Discrepancy
Starting Balance	\$1,812.84	\$300.90	\$1,511.94
Ending Balance	\$260.00	\$0.00	\$260.00

No documentary support exists to substantiate the numbers Lewis used to report her cash balances. The actual amounts were drawn directly from the depository statements for Lewis's campaign account and thus accurately reflect the true cash on hand at any given moment.

### **LEWIS'S ACTIONS WERE INTENTIONAL**

Lewis's actions were intentional. Intentional acts require that the "actor either has a purpose to do the thing or cause the result specified, or is aware that his or her conduct is practically certain to cause that result." WIS. STAT. §939.23(3). In this instance, Lewis intentionally submitted these reports. On every CFR, Lewis electronically signed the CFR, certifying that it was true, correct, and complete. She did this knowing they were false. This is shown by the pervasiveness of the false assertions throughout multiple years of CFRs. Further, this is shown by the structuring Lewis engaged in to avoid campaign contributions limits, as the only reason to falsely report a single donation as three separate donations was to avoid contribution limitations. Lewis had to be practically certain her CFRs were false, as, even using her false balances, the different reporting periods had wildly different numbers. The fact that the ending balance for one period and the starting balance for the next period were not the same provides additional circumstantial evidence that these were not negligent mistakes in bookkeeping, but were intentional attempts to falsify the records.

### **LEWIS FALSELY REPORTED A PERSONAL LOAN TO HER CAMPAIGN**

Complainant's review of Lewis's CFRs and banking records revealed additional campaign finance misconduct. For example, on March 3, 2019, Lewis recorded a loan of \$2,400.00 to her campaign on her CFR.

## SCHEDULE 3-B

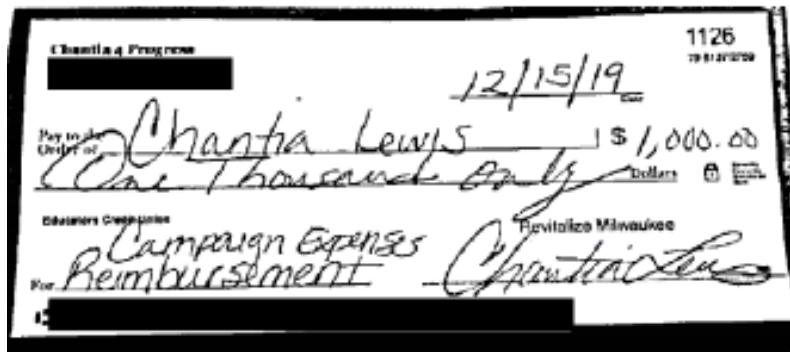
## Loans: Individual, Committee or Commercial

DATE	NAME	ADDRESS	CITY	ST	ZIP	Outstanding Balance Beg of Period	New Loans This Period	Cumulative Payments This Period	Outstanding Balance End of Period
03/03/19	Chantia Lewis	6670 N 73rd St	Milwaukee	WI	53223		\$2,400.00		\$ 2,400.00

However, this loan never occurred. There are no corresponding deposits into Lewis campaign depository account. The only deposit in that time frame is a \$260.00 deposit on March 1, 2019. Further, on or about March 1, 2019, there are no \$2,400 withdrawals from any of Lewis's personal account. However, there is an ATM withdrawal for \$260 on March 1, 2019 from Lewis's personal USAA account:

03/01                      260.00 ATM DB NONLOCAL                      030119                      6011030119  
U.S. BANKUS BANK GOOD HOPMILWAUKEE                      WI

As such, it appears that Lewis falsely entered a loan of \$2,400 to her campaign, when the actual loan was only \$260. In addition to falsely reporting the loan on her CFR, Lewis purported to pay herself back. On December 15, 2019, Lewis wrote herself a check against her campaign account in the amount of \$1,000, purportedly for Campaign Expenses Reimbursement:



This check was deposited into Lewis's personal account on December 16, 2019. Neither this check nor the original \$260 loan were reported on Lewis's CFR. By reimbursing herself \$1,000 on a loan that was at most \$260, Lewis defrauded her campaign of \$740. By falsely reporting the loan amount on her CFR and failing to report the \$1000 reimbursement, Lewis intentionally failed to make a full report of all contributions, disbursements, and obligations received, made, and incurred. She filed a false CFR by misreporting the relevant loan and not reporting the reimbursement expense.

## UNACCOUNTED FOR ATM WITHDRAWALS

In addition to the misappropriation discussed above, Lewis also engaged in inappropriate cash withdrawals from her campaign account. Under Wis. Stat. § 11.0106, every disbursement from a campaign depository account must be made by negotiable instrument (i.e. check). Despite this restriction, Lewis made numerous cash withdrawals from ATMs over multiple years. The chart below shows the different amounts of unaccounted for ATM withdrawals:

<b>Date</b>	<b>Amount</b>	<b>Location<sup>15</sup></b>
1/4/2016	\$300.00	Educators Credit Union @ 6131 W. Center St
1/25/2016	\$40.00	Educators Credit Union @ 10811 W. Park Place
4/16/2016	\$400.00	Educators Credit Union @ 2243 N. Prospect
4/18/2016	\$200.00	Educators Credit Union @ 10811 W. Park Place
11/30/2016	\$203.00	Chase in Marietta, Georgia
12/13/2016	\$180.00	Educators Credit Union @ 10811 W. Park Place
12/23/2016	\$300.00	Educators Credit Union @ 10811 W. Park Place
3/14/2017	\$402.50	Spire Credit Union - Minnesota
7/25/2017	\$80.00	Educators Credit Union @ 10811 W. Park Place
8/21/2017	\$23.00	211 W. Capitol Dr.
8/26/2017	\$203.00	Wisconsin Dells
8/26/2017	\$203.00	Wisconsin Dells
8/26/2017	\$130.00	Wisconsin Dells
9/23/2017	\$603.50	Washington DC
9/25/2017	\$200.00	Washington DC
9/25/2017	\$60.00	Washington DC
9/29/2017	\$600.00	Educators Credit Union @ 10811 W. Park Place
9/30/2017	\$600.00	Educators Credit Union @ 10811 W. Park Place
3/17/2018	\$100.00	Educators Credit Union @ 10811 W. Park Place
3/18/2018	\$160.00	Educators Credit Union @ 10811 W. Park Place
8/12/2019	\$502.50	Weatherstone Bank @ 5607 N. Port Wash Rd
1/13/2020	\$100.00	Educators Credit Union @ 10811 W. Park Place
<b>Total:</b>	<b>\$5,590.50</b>	

Due to the fact that ATM transactions are cash transactions, it is difficult to establish what purpose the withdrawn money was used for. Complainant notes, however, that each of these transactions, even if used for legitimate campaign purposes, still was a violation of Wis. Stat. § 11.0106. Further, several of these withdrawals occurred in Wisconsin Dells, as well as one in Georgia.. Complainant's investigation revealed that the withdrawals in Wisconsin Dells and in Georgia all occurred during family trips Lewis took. As such, there should have been no campaign related expenses.

<sup>15</sup> Each of these locations, unless otherwise specified, is in the City and County of Milwaukee.

These unaccounted for ATM withdrawals provide further support for Lewis's disregard for campaign finance laws and her malfeasance in managing her campaign account.

#### **REPAYMENT OF FUNDS**

Lewis did make some payments to her campaign account, as well as loan her campaign funds on occasion. However, that is not a justification or excuse for misappropriation campaign funds. The conversion of funds is complete upon the taking; repayment does not negate the thefts. Complainant notes that repayment of money unlawfully converted is not a defense in a theft prosecution, even if such intent existed contemporaneously with the act of conversion; such repayment is only relevant where it bears upon the intent to convert without authority. See *McGeever v. State*, 239 Wis. 87, 300 N.W. 485 (1941), and also *Boyd v. State*, 217 Wis. 149, 258 N.W. 300 (1935). An individual is not relieved of prosecution and punishment for theft even where full restitution is made. See *State ex. rel. Kropf v. Gilbert*, 213 Wis. 196, 251 N.W. 478 (1933). Lewis's misappropriation was complete the moment she took or used funds for illicit purposes. The fact she may have intended to repay those funds is not relevant to whether the conversion occurred.

#### **MISCONDUCT IN PUBLIC OFFICE**

At all times discussed in this complaint, Lewis was an Alderwoman for District 9 of the City of Milwaukee. An Alderwoman is a public officer. See WIS. STAT. § 939.22(30). In her capacity as a public officer, Lewis misappropriated funds belonging to her campaign by spending campaign funds on personal expenses, as well as by depositing campaign contributions into her personal accounts. She filed reimbursement requests from the City of Milwaukee for expenses she did not personally incur. She filed false CFRs, in which she misstated the amount of funds in her campaign accounts and falsely reported different contributions and expenditures. All of this conduct was in excess of her lawful authority and was conduct she was forbidden by law to engage in. Campaign finance laws specifically prohibit the filing of false CFRs, as well as using campaign funds for personal expenses. See WIS. STAT. §§ 11.1201 and 11.1208. Lewis knew this conduct was in excess of her lawful authority and was conduct she was forbidden by law from engaging in. This is demonstrated by the pervasive nature of the false assertions throughout her CFRs, as well as the fact that Lewis certified twice each year on her CFRs that she was in compliance with the campaign finance rules. Further, Lewis's knowledge is shown from her actions, including by depositing checks designated for her campaign into her personal accounts and spending campaign funds on purely personal expenses.

#### **AS TO ALL COUNTS**

The facts alleged in this entire complaint shall serve as the factual basis for all counts alleged herein. The headings contained are solely to provide guidance and do not limit the factual basis to only those facts underneath the specific heading.

**CONCLUSION<sup>16</sup>**

Chantia Lewis was an Alderwoman for the City of Milwaukee during all times in this complaint. She held a position of trust, where it was her responsibility to act for the common good of the City of Milwaukee. She violated that trust by filing false CFRs, defrauding the City of reimbursement monies, and misappropriating money belonging to her campaign account. All these actions were in violation of that position of trust. As a result of Lewis actions, she obtained a total benefit in excess of \$20,000. She received \$2,249.75 from the City of Milwaukee in false travel reimbursement. She received \$19,416.95 from her campaign, through depositing campaign checks in her personal accounts and misusing campaign funds.

Category of Loss	Cause of Loss	Loss
City Travel Reimbursement Fraud		\$2,249.75
Misuse of Campaign Funds	Misuse on City Travel	\$3,291.11
	Deposit Campaign Checks into Personal Acct	\$2,725.00
	Misuse on Personal Expenses	\$13,400.84
	<b>Total:</b>	<b>\$21,666.70</b>

\*\*\*\*End of Complaint\*\*\*\*

**Electronic Filing Notice:**

This case was electronically filed with the Milwaukee County Clerk of Circuit Court office. The electronic filing system is designed to allow for fast, reliable exchange of documents in court cases. Parties who register as electronic parties can file, receive and view documents online through the court electronic filing website. A document filed electronically has the same legal effect as a document filed by traditional means. You may also register as an electronic party by following the instructions found at <http://efiling.wicourts.gov/> and may withdraw as an electronic party at any time. There is a \$ 20.00 fee to register as an electronic party. If you are not represented by an attorney and would like to register an electronic party, you will need to contact the Clerk of Circuit Court office at 414-278-4120. Unless you register as an electronic party, you will be served with traditional paper documents by other parties and by the court. You must file and serve traditional paper documents.

Criminal Complaint prepared by Matthew Richard Westphal.

Subscribed and sworn to before me on 09/01/21

Electronically Signed By:

Electronically Signed By:

Thomas Meverden

Matthew Richard Westphal

Complainant

Assistant District Attorney

State Bar #: 1071292

<sup>16</sup> The charges listed in this complaint are not the extent of potential charges that may be brought. The State provides notice that additional charges relating to Lewis's fraudulent activity and her false CFR reporting may be brought. These include, without limitation, additional counts of Theft (§ 943.20), Fraudulent Writings (§ 943.39), Fraudulent Data Alteration (§ 943.392), Misconduct in Public Office (§ 946.12), Unauthorized Use of an Entity's Identifying Information or Documents (§ 943.203), as well as counts relating to additional campaign finance violations under Chapter 11.