FILED 06-25-2024 Anna Maria Hodges Clerk of Circuit Court

2024CF003028 Honorable Kori Ashley-19

Branch 19

CIRCUIT COURT MILWAUKEE COUNTY

STATE OF WISCONSIN

STATE OF WISCONSIN

Plaintiff,

DA Case No.: 2024ML015798 Court Case No.:

VS.

CRIMINAL COMPLAINT

CARR, AISHA D 960 NORTH 34TH STREET MILWAUKEE, WI 53208 DOB: 10/02/1987

Defendant(s).

For Official Use

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

Count 1: MISCONDUCT/OFFICE-ACT/INCONSISTENT DUTY

The above-named defendant April 26, 2021 to May 1, 2024, at 2819 North 2nd Street, in the City of Milwaukee, Milwaukee County, Wisconsin, while employed as a public employee and who, in her capacity as a public employee exercised a discretionary power in a manner inconsistent with the duties of her employment and with intent to obtain a dishonest advantage for another., contrary to sec. 946.12(3), 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 - FALSE REPRESENTATION (> \$10,000 - \$100,000)

The above-named defendant April 26, 2021 to May 1, 2024, at 5225 West Vliet Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did obtain title to property of the City of Milwaukee, having a value greater than \$10,000 but does not exceed \$100,000, by intentionally deceiving the person with a false representation which she knew to be false, made with intent to defraud and which defrauded the person, contrary to sec. 943.20(1)(d) 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.

Probable Cause:

Complainant is a Milwaukee County District Attorney's Office Deputy Chief Investigator and bases this complaint upon his own investigation which revealed the above named defendant an elected member of the Milwaukee Public School Board, falsified records to make it appear as though she lived inside the district she represented during the time she was elected to represent said district. This began on April 26, 2021 in Milwaukee County, when the defendant took office which she maintained until her resignation on May 1, 2024 of the position she was not able to lawfully take. Further the defendant's falsified records that allowed her to be paid for this position she was not legally able to hold.

More specifically this complaint is based on the following information which complainant obtained in the normal course of police business:

In the fall of 2023 the Milwaukee County District Attorney's Office Investigators received information that Milwaukee Public School Board Member Aisha Carr was living outside of the district in which she was representing.

Public records show that Carr was elected to represent MPS Fourth District on April 6, 2021. Media reported that Carr lived outside of the MPS Fourth District at that time she was elected. This is allowed by law. Carr acknowledged this at the time. Media reported that Carr stated she would move into the district if she won the election. After the election, Media reported Carr produced an updated Driver's License on April 26, 2021 showing an address within the MPS Fourth District, was certified and joined the board.1

Complainant reviewed the first campaign finance report filed on February 2, 2021 by Carr for her MPS School Board Campaign for district #4. According to the report, Carr listed her address as 2819 N. 2nd street. This address is outside district #4. This is consistent with an address listing Carr's residence complainant retrieved from DOT and Accurant which are databases complainant has used in investigations previously and known to be true and correct. The database reported Carr using this address from roughly February of 2018 through March of 2023. According to City of Milwaukee database "MyMilwaukeeHome"

(https://itmdapps.milwaukee.gov/MyMilwaukeeHome/indexSidebarNew.jsp) 2819 N. 2nd Street is in the MPS School Board District #5 not District #4. District 4 is the district to which Carr was elected.

CARR TAKES OFFICE

Complainant received a form from the Milwaukee Teacher's Education Association. The form showed Carr updated the Milwaukee Public School system with her new address as 2209 W. Brown ST. Milwaukee, WI. Carr needed to live in the district in order to take office and to receiver benefits and payroll. "MYMilwaukeeHome" showed this address as being in District #4 of the MPS School Board. It also showed this address as being with in the 15th Aldermanic District. Carr also now listed 2209 W. Brown St. Milwaukee as her address on her campaign finance report dated 08/10/2021 and all subsequent reports.

According to MPS on April 26, 2021 Carr took the office to become the MPS District #4 school board representative. This is a position as a public officer or employee that is in Milwaukee County. Complainant reviewed information from the Wisconsin Department of Transportation showing that same day Carr obtained a new Wisconsin Driver's License with the address of 2209 W. Brown St on April 26, 2021 and that same day she submitted it to MPS as proof she had moved into the district to legally represent it MPS central office is located at 5225 W Vliet St. Milwaukee. WI 53208. The previously referenced database showed Carr used the address for one event in April of 2021. According to utilities providers however which ones continued to list to Carr at 2819 N. 2nd street during this timeframe.

Carr sent the below email at 2:27 pm sending along false information regarding her place of residence in order to obtain the position. The email indicates that she had to get a new driver's license printed. Not only did she obtain a new driver's license but it was only on this day that she updated her address with the Department of Transportation to the address inside district #4.

¹ UPDATE: Aisha Carr reports move into MPS District 4 after living outside the area during school board race | Milwaukee Neighborhood News Service (milwaukeenns.org)

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From: Aisha Carr <

Sent: Monday, April 26, 2021 2:27 PM

To: Mann, Jacqueline M <

Subject: Proof of residency documentation

Caution External Source

Hello!

I apologize for the delay. I couldn't find my last printout for my drivers license so I had to go back to the DMV to purchase another because of the tight timeline. I'm attaching the photo copy and my phone bill. Please confirm that you received it.

Thank you for your time and patience. I look forward to working with you all.

Aisha C.

(414) 326-7939

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Aisha Carr, M.Ed.

Milwaukee, WI.

CARR VOTES IN AREA THAT WOULD BE ILLEGAL FOR HER TO VOTE IN BASED ON WHERE SHE CLAIMS TO HAVE LIVED AFTER TAKING OFFICE

Complainant reviewed information from My Vote Wisconsin (https://myvote.wi.gov/en-us/), a publicly accessible database showing voter history. Complainant entered Carr's name under "My voter info." According to that database, Carr voted at the Clinton Rose Senior Center, 3045 N. Martin Luther King Drive, Milwaukee, WI 53212 in the April 6th, 2021 Election, when she was a candidate for MPS Board District #4. According to "MYMilwaukeeHome" this would be the correct place to vote if she were living at 2819 N. 2nd St. Milwaukee. Carr continued to vote at that same election site in the February 15, 2022, November 8, 2022 and April 4, 2023 elections. However Carr reported to MPS that she had moved away from 2819 N. 2nd St. to 2209 W. Brown St. and had a DOT an address of 2209 W. Brown St. This Brown St address would require Carr to vote in the 15th Aldermanic District at Francis Starms Disc Learning School located at 2035 N. 25th St. Milwaukee. In short, Carr could not have legally voted at the Clinton Rose Senior Center and live in MPS School Board District #4, which is where she claimed to have lived during the times she voted in February and November of 2022 and April of 2023.

In addition complainant reviewed tax records that showed the owner of the house at 2209 W. Brown is owned by MW. Complainant reviewed the Campaign Finance Report for Aisha Carr for the January

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2021 continuing period. According to the report Carr submitted, on 02/02/2021, MW donated \$25.00 to Carr's campaign. On the report MW's address was listed as 2209 W. Brown St.

REVIEW OF VARIOUS RECORDS

Complaint learned from MPS that in her elected position, Carr earns approximately \$18,900 in compensation and qualifies for city of Milwaukee provided health insurance. Carr has been paid this after taking Office on April 26, 2021. MPS did not consent to paying anyone money for occupying an office or holding a position that was unlawful for such person to hold.

Complainant has reviewed records from MPS which indicated Carr provided documentation for payroll in benefits when she took office on or about April 26, 2021, that indicated she lived at the Brown St. Adress. This document is required to facilitate being paid and for benefits.

Complainant further reviewed Carr's campaign finance forms, Carr listed a phone number of **(414) 326-7939).** Complaint obtained records from WE Energies that showed the utility services for 2819 N. 2nd St were listed under the name "Aisha Carr" with the same social security number and phone number as MPS Board member Aisha Car. We Energies record showed Carr as responsible for utilities at 2819 N. 2nd Street from 2/01/2018 until 04/13/2023

In addition Complainant obtained records from Charter Communications that showed the Internet and cable services were listed for 2819 N. 2nd St under the name "Aisha Carr" with the phone number as MPS Board member Aisha Car. We Energies record showed Carr as responsible for cable service at 2819 N. 2nd Street from 2/06/2018 until 03//20/2023.

In short Carr was responsibility for the utilities at a residence outside the district she claimed to have lived in until Spring of 2023, almost two years after she took office.

CELL PHONE RECORDS INCONSISENT WITH CARR EVER LIVING AT BROWN ST ADDRESS

Under a signed search warrant, complainant obtained cell phone tower data. An Milwaukee County District Attorney analyst used software known to take cell phone tower data and approximate locations of the phone user to create a set of maps for each month between April of 2021 and November of 2023. The maps depicted the locations between the times of 10:00 p.m. and 5:00 a.m., Complainant stated that these times were selected as they are consistent with someone with Carr's known employment to most likely be at their residence. An analysis of Carr's cell phone records showed that that from April of 2021 through March of 2023, Carr spent the significant amount of time during those hours at 2819 N. 2nd street outside District #4. After March of 2023, the data changed to show the most significant amount of time at 960 N. 34th St. This is consistent with the change in utility service. At no time did the records indicate Carr's cell phone was connected to a tower consistent with her living at an Address in MPS District #4 until March of 2023.

INTERVIEW OF AISHA CARR

On Friday, March 8, 2024, the affiant and MCDA Investigator Michael Sarenac interviewed Aisha Carr. In that interview Carr set forth the following timeline for her official residence:

- a. 2819 N. 2nd street from 2018- April of 2021
- b. 2209 W. Brown from April of 2021 to 6 to 9 months later.
- c. 3413 N. 34th St from the time she left 2209 W Brown St until Jan of 2023
- d. 960 N. 34th St from January of 2023 until the present.

cousin.

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Carr stated that while she lived at 2209 W. Brown she paid no rent, as the home is owned by her

During Carr's interview she stated that despite moving to set up residence at the three addresses after April of 2021, she continued to pay rent and utilities at 2819 N 2nd street until March of 2023 even though she had not lived there since April of 2021. Carr claimed to still have property at 2819 N. 2nd street. Carr stated she used the apartment to conduct MPS zoom meetings and other research for her role as a school board member, despite that address being outside of her district and not where she claimed to reside.

Carr stated she used 2819 N. 2nd street for work on her campaign functions after being elected to her post, However a review of Brown's campaign finance reports shows she listed the 2209 W. Brown St. Address as her campaign address from Fall of 2021 through December of 2023.

Carr also claimed she maintained 2819 N. 2nd street for a place to conduct work for her business. In addition Carr made a statement to complainant and Investigator Sarenac that she "does not take the pay that" that MPS provides her for working on the school board. She stated she has the money go into an account that she is building for a charitable foundation she wishes to create. She stated she does not use that money for living expenses.

Carr presented several documents to the affiant and Investigator Sarenac to prove he history of residences. On item she presented was a bank statement form PNC BANK in her name bearing. The statement was dated showing the activity from November 10, 2022 through December 08, 2022. It listed her address as 2209 W. Brown, despite Carr stating she would have lived at 3413 W. Highland Blvd at the time. The bank statement showed a deposit in the amount of \$983.74 which is consistent with her payment from MPS she would have received from the time she took office until present per MPS records.

Carr also provided an I-9 form where she lists her address as 2819 N. 2nd, which is outside district #4 and signs and dates the form more than a year after she took office for District #4. On this form per Carr signature she acknowledged that False information on said form could result in imprisonment. The portion of her address and signature and warning is excerpted below.

V

Section 1. Employee Information than the first day of employment, but no				st complete and	sign Section 1	of Form I-9 no later	
Last Name (Family Name) Carr	First Name (Gir Aisha	ven Name,)	Middle Initial D.	Other Last Names Used (if any)		
Address (Street Number and Name) 2819 North 2nd Street		lumber	City or Town Milwaukee		State WI	ZIP Code 53212	
Date of Birth (mm/dd/yyyy) U.S. Social Se	ocial Security Number Employee's E-mail Address				Employee	s's Telephone Number	
I am aware that federal law provides for imprisonment and/or fines for false statements or use of false documents in connection with the completion of this form. I attest, under penalty of perjury, that I am (check one of the following boxes):							
X 1. A citizen of the United States							
2. A noncitizen national of the United States (See instructions)							
3. A lawful permanent resident (Alien Registration Number/USCIS Number):							
4. An alien authorized to work until (expiration date, if applicable, mm/dd/yyyy): Some aliens may write "N/A" in the expiration date field. (See instructions)							
Aliens authorized to work must provide only one of the following document numbers to complete Form I-9: An Alien Registration Number/USCIS Number OR Form I-94 Admission Number OR Foreign Passport Number.						QR Code - Section 1 o Not Write In This Space	
Alien Registration Number/USCIS Number OR	·			_			
2. Form I-94 Admission Number: OR				_			
Foreign Passport Number:				_			
Country of Issuance:							
Signature of Employee				Today's Date 05/02/2	(mm/dd/yyyy) 022		

RENTAL HISTORY FOR CARR

The day before Carr was interviewed as just mentioned, on March, 8 2024 Investigators interviewed MW on March 7, 2024, the cousin of Carr, and owner of the 2209 W. Brown St. Address, MW. MW was at that same location and M.W. stated Carr has never lived nor had a long term stay at the 2209 W. Brown address.

Complaint interviewed JP, the owner of the property located 2819 N. 2nd street. JP indicated that he had signed a lease with Carr on 01/18/2018, shortly after he took ownership of the home. The lease was good for one year and after that Carr continued to rent the apartment on a month to month basis. JP stated Carr lived in the apartment until March of 2023. JP stated he asked Carr to move out so he could allow his adult daughter to live there. This is consistent with the cell phone records and the statement of MW as well as utility records.

CONCLUSION

Carr did not move into MPS District 4 by the time she needed to take office. Complainant knows that WI State Statute Chapter 119 sets rules for First Class City Schools Systems. Milwaukee is a First Class City. According to WI State Statute 119.08 (1)(c)

A person elected to represent a district shall reside within the boundaries of the district, except that if a person ceases to reside within the district because the boundaries of the district are changed during the person's term of office, the person may continue to serve for the balance of the

term for which he or she was elected for so long as the person resides in the school district. Before taking office, the members of the board shall take the official oath of office and file it, duly certified by the officer administering the oath, with the city clerk."

Complainant has reviewed information that shows Carr was paid in access of 10,000 dollars for this position on the MPS Board that she was not eligible for. Carr obtained this money by lying about being able to take the District #4 position. This is theft by fraud. Carr should not have ever taken any money let alone continue to accept payment for holding a position she could not lawfully hold.

Because Carr 's address was false on her driver's license Carr uttered a forged application to the Wisconsin Department of Transportation as she lied about her residence to get the driver's license with a false address.

Carr also committed Misconduct in public office, because while not legally abled to obtain the office she was employed as a public employee. While employed as such she, either by commission or omission exercised a discretionary power in a manner inconsistent with the duties of her officer's by accepting and continuing to accept payment for this position for which she was not eligible, which is a dishonest advantage for herself.

This all occurred between the above dates and in Milwaukee County Wisconsin.

This does not exhaust all the information presently available at this time.

****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 Nicolas J Heitman. ADA Assigned Email Address: Nicolas.Heitman@da.wi.gov

Subscribed and sworn to before me on 06/25/24 Electronically Signed By: Nicolas J Heitman Assistant District Attorney

State Bar #: 1070560

Electronically Signed By: Thomas Meverden Complainant