

**STATE OF WISCONSIN****CIRCUIT COURT****SHEBOYGAN COUNTY**

STATE OF WISCONSIN

**CRIMINAL COMPLAINT**

-VS-

Kirk C Riddle  
N7017 Riverwoods Drive  
Sheboygan, WI 53083  
DOB: 07/26/1966  
Sex/Race: M/W  
Alias:

DA Case No.: 2013SB001904  
Assigned DA/ADA: Jennifer A Bork  
Agency Case No.: K13-00977  
Court Case No.: 2013CF

Defendant,

Officer Chad Gross, Kohler Police Department, being first duly sworn on oath deposes and says on information and belief:

**Count 1: THEFT - BUSINESS SETTING ( > \$2500 - \$5000 )**

The above-named defendant on or about May 10, 2013, in the Village of Kohler, Sheboygan County, Wisconsin, by virtue of his employment, having possession of negotiable instruments of another, did use such negotiable instruments without the owner's consent, contrary to the defendant's authority, and with intent to convert said property to his own use, contrary to sec. 943.20(1)(b) and (3)(bf), 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 - BUSINESS SETTING ( > \$2500 - \$5000 )**

The above-named defendant on or about May 15, 2013, in the Village of Kohler, Sheboygan County, Wisconsin, by virtue of his employment, having possession of negotiable instruments of another, did use such negotiable instruments without the owner's consent, contrary to the defendant's authority, and with intent to convert said property to his own use, contrary to sec. 943.20(1)(b) and (3)(bf), 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.**

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**Count 3: THEFT - BUSINESS SETTING ( > \$2500 - \$5000 )**

The above-named defendant on or about April 29, 2013 through May 17, 2013, in the Village of Kohler, Sheboygan County, Wisconsin, by virtue of his employment, having possession of negotiable instruments of another, did use such negotiable instruments without the owner's consent, contrary to the defendant's authority, and with intent to convert said property to his own use, contrary to sec. 943.20(1)(b) and (3)(bf), 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 4: THEFT - BUSINESS SETTING OVER \$10,000**

The above-named defendant on or about April 29, 2013, in the Village of Kohler, Sheboygan County, Wisconsin, by virtue of his employment, having possession of negotiable instruments having a value greater than \$10,000, of another did use such negotiable instruments without the owner's consent, contrary to the defendant's authority, and with intent to convert the property to his own use, 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 5: THEFT - BUSINESS SETTING OVER \$10,000**

The above-named defendant on or about April 29, 2013, in the Village of Kohler, Sheboygan County, Wisconsin, by virtue of his employment, having possession of negotiable instruments having a value greater than \$10,000, of another did use such negotiable instruments without the owner's consent, contrary to the defendant's authority, and with intent to convert the property to his own use, 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 6: THEFT - BUSINESS SETTING ( > \$2500 - \$5000 )**

The above-named defendant on or about December 2, 2012, in the Village of Kohler, Sheboygan County, Wisconsin, by virtue of his

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employment, having possession of negotiable instruments of another, did use such negotiable instruments without the owner's consent, contrary to the defendant's authority, and with intent to convert said property to his own use, contrary to sec. 943.20(1)(b) and (3)(bf), 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 7: THEFT - BUSINESS SETTING ( > \$5000 - \$10,000 )**

The above-named defendant on or about December 2, 2012, in the Village of Kohler, Sheboygan County, Wisconsin, by virtue of his employment, having possession of negotiable instruments of another, did use such negotiable instruments without the owner's consent, contrary to the defendant's authority, and with intent to convert said property to his own use, contrary to sec. 943.20(1)(b) and (3)(bm), 939.50(3)(h) Wis. Stats.

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

**Count 8: THEFT - BUSINESS SETTING ( > \$5000 - \$10,000 )**

The above-named defendant on or about December 2, 2012, in the Village of Kohler, Sheboygan County, Wisconsin, by virtue of his employment, having possession of negotiable instruments of another, did use such negotiable instruments without the owner's consent, contrary to the defendant's authority, and with intent to convert said property to his own use, contrary to sec. 943.20(1)(b) and (3)(bm), 939.50(3)(h) Wis. Stats.

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

**Count 9: THEFT - BUSINESS SETTING ( > \$2500 - \$5000 )**

The above-named defendant on or about December 2, 2012, in the Village of Kohler, Sheboygan County, Wisconsin, by virtue of his employment, having possession of negotiable instruments of another, did use such negotiable instruments without the owner's consent, contrary to the defendant's authority, and with intent to convert

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said property to his own use, contrary to sec. 943.20(1)(b) and (3)(bf), 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 10: THEFT - BUSINESS SETTING OVER \$10,000**

The above-named defendant on or about May 20, 2013, in the Village of Kohler, Sheboygan County, Wisconsin, by virtue of his employment, having possession of negotiable instruments having a value greater than \$10,000, of another did use such negotiable instruments without the owner's consent, contrary to the defendant's authority, and with intent to convert the property to his own use, 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 11: THEFT - BUSINESS SETTING ( > \$2500 - \$5000 )**

The above-named defendant on or about April 1, 2013 through May 15, 2013, in the Village of Kohler, Sheboygan County, Wisconsin, by virtue of his employment, having possession of negotiable instruments of another, did use such negotiable instruments without the owner's consent, contrary to the defendant's authority, and with intent to convert said property to his own use, contrary to sec. 943.20(1)(b) and (3)(bf), 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 12: THEFT - BUSINESS SETTING ( > \$2500 - \$5000 )**

The above-named defendant on or about April 1, 2013 through May 23, 2013, in the Village of Kohler, Sheboygan County, Wisconsin, by virtue of his employment, having possession of negotiable instruments of another, did use such negotiable instruments without the owner's consent, contrary to the defendant's authority, and with intent to convert said property to his own use, contrary to sec. 943.20(1)(b) and (3)(bf), 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.**

The basis of complainant's charge of such offense is: Official reports prepared by Officer Chad Gross of the Kohler Police Department, which reports indicate that on May 23, 2013, Patrick McCarthy, Director of Kohler Company Corporate Security, received information about a potential internal fraud involving associate Kirk Riddle, DOB 07/26/66, hereinafter the Defendant. The Defendant was a Communication Leader assigned at The Beacon, a building on the Kohler Company campus. Patrick McCarthy initiated an investigation and learned the following: That between April 16, 2013 and May 17, 2013, the Defendant used his corporate card to expend approximately \$17,100.00 and his purchase card to expend more than \$100,000.00, all in unauthorized transactions. The total of unauthorized transactions on both credit cards during the 30-day time period exceeded \$117,500.00.

During the investigation into the charges on the Defendant's Kohler Owner Corporate, Purchasing and Hospitality credit cards, Patrick McCarthy learned many of the \$117,500.00 mentioned were for illegal activities. Specifically, Patrick McCarthy learned that the Defendant spent \$72,000.00 (two separate \$36,000.00 purchases on or about April 29, 2013) to purchase advertising from a company called "Dex One". The Defendant paid for Internet and Yellow Page advertising with Dex One Advertising Services for "adult VIP entertainment" in Las Vegas, of which the Defendant was apparently the proprietor.

An additional purchase for \$15,000.00 was from a company called "DESP". That purchase was made on or about May 15, 2013. Patrick McCarthy called the telephone number associated with DESP and learned that it was a company that sold "female escort services".

Another unauthorized transaction was made on or about May 7, 2013 from Best Buy in Kohler, Wisconsin, for \$83.99.

Three separate unauthorized transactions were for AT&T in Grafton, also in connection with Best Buy on or about May 10, 2013, with Best Buy purchase being \$10,667.05; one AT&T Tablet in Grafton being \$443.45; one Tablet in AT&T in Grafton, Wisconsin, being \$412.83; and the third tablet at AT&T in Grafton, Wisconsin, being \$485.75.

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Patrick McCarthy indicates the purchases for mobile phones, cameras, and other electronic recording equipment and airplane travel from Las Vegas to Milwaukee for several women, including Courtney Hicks, Chelsey Colson, Tarnita Woodard, Madeleine Rainey, Christina Polous, Jacqueline Realegeno. Patrick McCarthy also indicates that there was associate hotel and motel lodging expenses, rental car expenses, and other similar unauthorized expenses associated with these women that accounted for several thousands of dollars in charges.

- On or about May 12, 2013, there was a Southwest Airlines transaction for Jacqueline Realegeno in the amount of \$426.90
- On or about May 12, 2013, there was a Southwest Airlines ticket for Christina Polous in the amount of \$426.90
- On or about May 12, 2013, there is an airline purchase from Southwest Airlines for Tarnita Woodard in the amount of \$425.90
- On or about May 14, 2013, there is a rental car Enterprise transaction in the amount of \$1,234.98
- On or about May 16, 2013, at the Hyatt Place in Milwaukee, there is a \$244.51 transaction
- On or about May 15, 2013, there is a Stadium Citgo Milwaukee charge for \$78.87
- On or about May 18, 2013, there is a Go Rite-Way Transportation transaction in the amount of \$57.05
- On or about May 18, 2013, there is a How-Dea Minimart transaction in Belgium, Wisconsin, in the amount of \$66.13
- On or about May 19, 2013, there is a How-Dea Minimart transaction in Belgium, Wisconsin, in the amount of \$48.47
- On or about May 16, 2013, there is a Best Western transaction in Milwaukee, Wisconsin, in the amount of \$264.71
- On or about May 17, 2013, there is a Super 8 Motel transaction in Saukville, Wisconsin, in the amount of \$76.57
- On or about May 17, 2013, there is a Southwest Airlines ticket purchase for Courtney Hicks, in the amount of \$426.90
- On or about May 17, 2013, there is a Southwest Airlines ticket transaction for Tarnita Wood for \$426.90
- On or about May 17, 2013, there is a Southwest Airlines ticket transaction for Christina Polous, for \$426.90
- On or about April 29, 2013, there is a Southwest Airlines ticket purchase for Courtney Hicks, for \$426.90
- On or about April 29, 2013, there is a Southwest Airlines ticket purchase for Chelsey Colson, for \$426.90
- On or about April 29, 2013, there is a Southwest Airlines ticket purchase for Tarnita Woodard for \$426.90

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- On or about April 29, 2013, there is a Hampton Inn transaction in Grafton, Wisconsin, for \$145.25
  - On or about April 30, 2013, there is a Hampton Inn transaction in Grafton, Wisconsin, for \$156.60
  - On or about May 1, 2013, there is a 525 Silver Spring BP transaction in Glendale, Wisconsin, for \$16.15
  - On or about April 30, 2013, there is a Shell Oil purchase in Milwaukee, Wisconsin, for \$66.20
  - On or about May 2, 2013, there is a Hyatt Place transaction in Milwaukee, Wisconsin, for \$384.07
  - On or about May 2, 2013, there is a purchase for Sprint Wireless for \$190.31
  - On or about May 4, 2013, there are two purchases from How-Dea Minimart in Belgium, Wisconsin; one for \$53.13 and the other for \$73.91
  - On or about May 2, 2013, there was a Southwest Airlines ticket purchase for Chelsey Colson, in the amount of \$437.80
  - On or about May 2, 2013, there was a Southwest Airlines ticket purchase for Madeleine Rainey, in the amount of \$426.90
  - On or about May 2, 2013, there was a Southwest Airlines ticket purchase for Christina Polous, for \$426.90
  - On or about May 4, 2013, there was a Southwest Airlines ticket purchase for Jacqueline Realegeno, for \$426.90
  - On or about May 5, 2013, there was a purchase from Marshall's Western Shrs, in Sheboygan, Wisconsin, for \$46.67
  - On or about May 7, 2013, there was a transaction from Exxon Mobile in Kohler, for \$69.51
  - On or about May 7, 2013, there were two purchases from AT&T Data for \$15.74 and \$31.50
  - On or about May 8, 2013, there was a Southwest Airlines ticket purchase for Madeleine Rainey in the amount of \$426.90
  - On or about May 11, 2013, there was a Go Rite-Way Transportation transaction in the amount of \$50.90
  - On or about May 11, 2013, there was a Kwik Trip purchase in Sheboygan, Wisconsin, for \$14.74
  - On or about May 12, 2013, there were two more Kwik Trip purchases in Sheboygan, Wisconsin; one for \$51.15 and the other for \$58.24
  - On or about May 12, 2013, there was a Southwest Airlines ticket purchase for Courtney Hicks in the amount of \$426.90
  - On or about April 23, 2013, there were two purchases for Centerfolds in Nevada for two transactions for \$10,000.00 each
  - On or about December 3, 2012, the Defendant also made transactions on PayPal on four separate transactions; one in

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the amount of \$5000.00; two in the amount of \$10,000.00; one in the amount of \$7000.00

- On or about May 13, 2013, the Defendant made a purchase at H & M clothing store in the purchase amount of \$687.30
- On or about May 15, 2013, the Defendant made a purchase at DSP, an online advertising agency for escort/massage services, in the amount of \$15,000.00
- On or about April 1, 2013 to May 12, 2013, the Defendant purchased on his hospitality card ending in 1994, in the amount of \$2589.40, at the American Club, a purchase that was not consented to by the Kohler Company.

All of the above transactions were made on credit cards that were provided to the Defendant through his course of employment and were made without the consent of his employer and outside the scope of his purchasing abilities per contract of his credit card use.

The Defendant had admitted to Patrick McCarthy that he had made several purchases on his corporate card that may not be authorized, that he put several women up in various Milwaukee area hotels and admitted that he also "managed" these women out of his home in Sheboygan. The Defendant declined to state how much money he made for this management activity.

On May 29, 2013, Officer Gross of the Kohler Police Department, made contact with the Defendant and asked to speak with him. The Defendant was mirandized and the Defendant was shown the detailed credit card billing statements for credit cards issued to him through the Kohler Company, ending in 2344 and 0239. The Defendant continued to refer back to charges that were not being disputed on the corporate cards. However, when confronted specifically with the charges that were being disputed, the Defendant indicated he was not aware of them. The Defendant admitted that the charges that were placed on his corporate card ending in 2344 at the AT&T Grafton store on May 10, 2013, as well as the charge at Best Buy Grafton store on May 10, 2013. Specifically referring to the Best Buy charge, the Defendant indicated that he had probably been drinking and had "fucked up". The Defendant stated he had been partying with some girls and bought some cameras and other things. The Defendant indicated that it wasn't an issue and that if Officer Gross would take him to his residence, the Defendant could get a check and the Defendant would be able to write a check to cover those charges. The Defendant would not admit to any of the other charges.

It should be noted that on the statement for the account ending in 0239, there are several plane tickets purchased under the name of



several females through Southwest Airlines on May 14 and May 20, 2013. The plane tickets were from Las Vegas to Milwaukee. Officer Gross showed the statement to the Defendant and the Defendant indicated that he did know the females who were named on the plane tickets. The Defendant indicated that they were friends of his and that he invited them to come here to "party".

During Officer Gross' conversation with Kohler Company Corporate Security Director Patrick McCarthy, Mr. McCarthy had indicated that the Defendant had spoken with Mr. McCarthy via phone on the morning of May 29, 2013, and had admitted that the Defendant was in the process of starting an escort company in Las Vegas, Nevada. Apparently, during this conversation with Mr. McCarthy, the Defendant had spoken of several of the charges on both of these card statements. When confronted with that information by Officer Gross, the Defendant indicated that he did not remember that conversation.

After the Defendant spoke with Officer Gross, the Defendant advised that he still had in his custody the Kohler Company credit cards in his wallet and turned over three Kohler Company Visa credit cards, two AT&T cards, and the Defendant's Kohler Company work ID card.

A Search Warrant was conducted of the Defendant's residence on May 29, 2013, at N7017 Riverwoods Drive, in Sheboygan, County of Sheboygan, and during the search warrant, one Southwest plane ticket for Christina Polous was found on a dresser drawer and was taken into evidence.

All of the above purchases included in the Criminal Complaint were on several Visa credit cards that were given to the Defendant through his company as a part of his employment. The Kohler Company did not give the Defendant consent to use the credit card in the fashion or manner as the Defendant did in the transactions as stated above. Kohler Company did pay Visa by electronic transfer from Kohler, Wisconsin, in the County of Sheboygan, to any Visa corporate offices for billing purposes.

Subscribed and sworn to before me  
this \_\_\_\_\_ day of June, 2013  
and approved for filing:

\_\_\_\_\_  
Assistant District Attorney  
Sheboygan County, Wisconsin

\_\_\_\_\_  
Complainant