

State of Wisconsin

Circuit Court

Brown County

STATE OF WISCONSIN

DA Case No.: 2014BR004129
Assigned DA/ADA: Beau G. Liegeois
Agency Case No.:

-vs-

Plaintiff,

Court Case No.: 2014CF

WARRANT

Daniel D Steiner
W2860 Brookhaven Drive
Appleton, WI 54915
DOB: 06/23/1975
Sex/Race: M/W
Eye Color: Hazel
Hair Color: Brown
Height: 6 ft 1 in
Weight: 270 lbs
Alias:

Defendant,

THE STATE OF WISCONSIN TO ANY LAW ENFORCEMENT OFFICER:

A complaint, a copy of which is attached, having been made before me accusing the defendant of committing the crime(s) of:

THE CRIME(S) OF: DATE OF VIOLATION: CONTRARY TO WIS. STATUTE(S):
Theft by Contractor >\$2500 06/02/2011 779.02(5) and 943.20(3)(bf)
<=\$5000

And having found that probable cause exists that such violation was committed by the defendant, you are, therefore, commanded to arrest the defendant and bring him before me, or if I am not available, before some other judge of this county.

Dated this 17 day of June 2014.


Circuit Court Judge/Court Commissioner

EXTRADITION: Wisconsin Only: Nationwide: X Adjoining States:

State of Wisconsin

Circuit Court

Brown County

STATE OF WISCONSIN

-vs-

Plaintiff,

Court Case No.: 2014CF _____

Daniel D. Steiner
d/b/a Midwest Roofing Company
W2860 Brookhaven Dr.
Appleton, WI 54915
DOB: 6/23/1975
Sex/Race: M/W
Height: 6'1"
Weight: 270
Hair: Brown
Eyes: Hazel

CRIMINAL COMPLAINT

Defendant,

Complainant, an Assistant District Attorney, being first duly sworn on oath, deposes and says that:

COUNT 1: THEFT BY CONTRACTOR (\$2500 - \$5000)

The above-named defendant on or about June 2, 2011, in the City of Green Bay, Brown County, Wisconsin, did as one under an agreement for the improvement of land, receive money from the owner, Marita Vrba, and, without consent of the owners and contrary to his authority; intentionally used any of the money for any purpose other than the payment of claims due or to become due from the defendant for labor and materials used in the improvements before all claims were paid in full contrary to sec. 943.20(1)(b) Wis. Stats. and contrary to sec. 779.02(5) and 943.20(3)(bf), 939.50(3)(i) Wis. Stats.

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

PROBABLE CAUSE

Investigator Camellia Howe reports that she is employed in the Consumer Protection and Antitrust Unit of the Wisconsin Department of Justice and has investigated civil and criminal consumer protection complaints for the past four years. Investigator Howe was assigned to investigate numerous complaints of Theft by Contractor perpetrated by the defendant, Daniel Steiner, in Outagamie, Brown, and Dane Counties.

The Articles of Incorporation for "Midwest Roofing Corporation." filed with the Wisconsin Department of Financial Institutions, name the defendant, Daniel D. Steiner, as the registered agent. Those records are kept in the normal course of business.

On January 25, 2013, Investigator Howe was present at the Grand Chute Police Department for an interview with the defendant, during which he stated that Midwest Roofing was his business and that he did all of the deposits. The defendant stated that Midwest Roofing went bankrupt. The defendant described his situation as one of "cash flow." The defendant stated that he would use

funds from one client's project to "do the next person's job." The defendant stated that if a client did not pay, his hands were tied. The defendant stated that when money came in from one job he would use it to keep different jobs going.

Investigator Howe reports that she read court documents filed on September 16, 2011 in Brown County Circuit Court case no. 11-SC-5030, *Marita Vrba v. Midwest Roofing Corporation*. In that case, a judgment was entered against Midwest Roofing and the defendant for \$5,000, payable to Marita Vrba.

Investigator Howe spoke with Vrba on November 5, 2012. Vrba stated that on May 7, 2011 she signed a contract with the defendant to do roofing work at her residence, located in the City of Green Bay, Brown County, Wisconsin. Vrba stated that the defendant required half of the payment up front to cover building materials for the roof. Vrba stated that she had her bank issue a check to "Midwest Roofing Corp" in the amount of \$3,675.00. Vrba gave the check to the defendant and no work was ever performed.

Vrba a copy of the check she issued to the defendant from PCM Employees Credit Union. The copy shows the front and the back of the cashed check that was issued by PCM EMPLOYEE and made payable to "Midwest Roofing Corp" for the amount of \$3,675.00, dated June 2, 2011. The reverse side of the check contains the following information: "CREDITED TO THE ACCOUNT OF THE WITHIN PAYEE ANCHOR BANK," which cleared on June 9, 2011.

Vrba stated that not only did the defendant "steal" her money, but she had to pay higher insurance rates while she waited for him to finish her roof.

During his January 25, 2013 interview at the Grand Chute Police Department, the defendant stated that the money for the Vrba project was gone. The defendant stated that Vrba sued him and that he was making payments to her attorney.

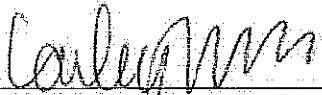
Your complainant is an Assistant District Attorney for the Brown County District Attorney's Office, who bases his/her knowledge of this complaint on:

- the official law enforcement agency reports, which reports were prepared in the normal course of law enforcement duties;
- statements by citizen informant(s), who are eyewitnesses to the facts they relate;
- statements by the defendant, which were made contrary to his penal interests;
- the official records of: the Circuit Court for Brown County; the Department of Transportation; the FBI Triple I Teletype; and the Wisconsin Circuit Court Automated Program, which records are maintained in the normal course of business duties.

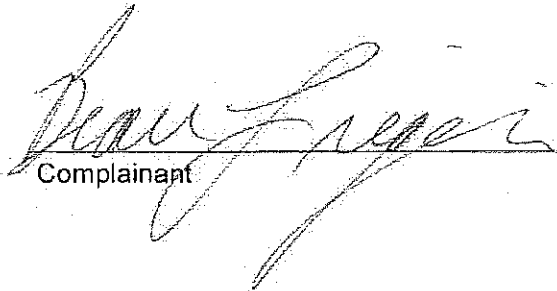
Based on the foregoing, the complainant believes this complaint to be true and correct.

Subscribed and sworn to before me,
and approved for filing on:

This 16 day of June, 2014.



Assistant District Attorney



Complainant