

STATE OF WISCONSIN

CIRCUIT COURT

DODGE COUNTY

STATE OF WISCONSIN,

Plaintiff,

v.

Case No. 11-CF-_____

LISA A. HOPPER,
700 Macarthur Drive
Beaver Dam, WI
W/F DOB 12/21/1965,

Defendant.

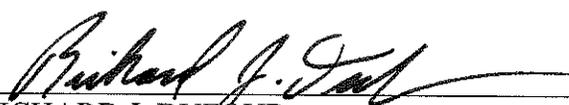
SUMMONS

THE STATE OF WISCONSIN TO SAID DEFENDANT:

The Complaint, a copy of which is attached, having been made before me accusing the defendant, Lisa A. Hopper, of the crimes of Theft, contrary to Wis. Stat. § 943.20(1)(b) and Fraudulent Writings, contrary to Wis. Stat. § 943.39(1).

You, Lisa A. Hopper, are, therefore, summoned to appear before Court Commission Steven Seim, Dodge County Justice Facility, 210 West Center Street, Juneau, Wisconsin, to answer said Complaint on Monday, November 21, 2011, at 10:30 a.m. In case of your failure to appear, a warrant for your arrest will be issued.

Dated this 9th day of November, 2011.



RICHARD J. DUFOUR
Assistant Attorney General and
Special Prosecutor for Dodge County
State Bar No. 1014811

STATE OF WISCONSIN,

Plaintiff,

v.

Case No. 11-CF-_____

LISA A. HOPPER,
700 Macarthur Drive
Beaver Dam, WI
W/F DOB 12/21/1965,

Defendant.

CRIMINAL COMPLAINT

I, Kyra M. Schallhorn, being first duly sworn, state upon information and belief that:

COUNT ONE (Theft): On or about the period between February 12, 2004, and May 14, 2007, in the City of Beaver Dam, Dodge County, Wisconsin, defendant did, by virtue of her employment at Carol's Tours, Inc., having custody of money belonging to Carol's Tours, Inc., intentionally transfer possession of money in an amount in excess of \$10,000.00, without the owner's consent, contrary to her authority, and with intent to convert the money to her own use. This act violates Wis. Stat. § 943.20(1)(b), a Class G felony, punishable by a fine not to exceed \$25,000, imprisonment not to exceed 10 years, or both.

COUNT TWO (Fraudulent Writings): On or about May 4, 2007, in the City of Beaver Dam, Dodge County, Wisconsin, defendant as an employee of Carol's Tours, Inc., with intent to defraud, falsified a record belonging to Carol's Tours, Inc. by false entry in the corporation's check register. This violates Wis. Stat. § 943.39(1), a Class H felony punishable by fine not to exceed \$10,000, imprisonment not to exceed six years or both.

FACTUAL BASIS

I am a Special Agent with the Wisconsin Department of Justice, Division of Criminal Investigation (DCI) and have been so employed since 1994. My primary duties involve investigating alleged violations of Wisconsin laws involving crimes against property.

Background facts

In November 2008, I met with Beaver Dam Police Department Lieutenant Joel Kiesow to discuss a financial investigation he was working on. The investigation involved Carol's Tours Inc., a travel agency owned by Deborah I. Paul. Carol's Tours had closed down in early 2008, and many customers had their trips cancelled and did not receive refunds. Paul came to Lt. Kiesow with allegations that her former office manager, Lisa A. Hopper, had been embezzling money from the company and that is the reason Paul had to close the business. Paul provided Lt. Kiesow with copies of several cancelled checks drawn on Carol's Tours account that she believed had gone to pay for Hopper's personal bills, contrary to Hopper's authority. Paul indicated to Lt. Kiesow that she had not given Hopper permission to use Carol's Tours checks to pay Hopper's personal bills.

As a part of his investigation, Lt. Kiesow subpoenaed documents from various entities regarding Carol's Tours, Inc. and/or Deborah Paul. He also obtained original corporate records from Carol's Tours, Inc. Lt. Kiesow received responsive documents from West Bend Savings Bank regarding account number 1110001452 in the name of Carol's Tours, Inc. These documents included copies of checks drawn on the account for the years 2006 and 2007. Lt. Kiesow also received responsive documents from Stephen M. Kjer, a certified public accountant used by Carol's Tours. The documents from Kjer included copies of handwritten check registers for the years 2006 and 2007 that were provided to him from Carol's Tours. The majority of the entries in the check register appear to have been made by Hopper.

Lt. Kiesow's investigation revealed the fact that in 2007 and 2008, Deborah Paul, Carol's Tours, Inc. and Lisa and Richard Hopper, had all filed for bankruptcy with the U.S. Bankruptcy Court for the Eastern District of Wisconsin. I subsequently received court records and information from Bankruptcy Analyst Mary Kay McSherry that had been provided to the Bankruptcy Court by Paul and by the Hoppers. The documents included lists of creditors for Paul, Carol's Tours, and the Hoppers. I believe the information contained in the bankruptcy records is accurate and reliable because the records are maintained by the bankruptcy court in the ordinary course of its operations and the information contained therein is relied upon by the court. In the bankruptcy court records, the Hoppers list debt for credit cards at \$50,000 as of November 1, 2007.

I believe the information provided by Lt. Kiesow because it was information he gathered during his employment as a law enforcement officer.

I have personally interviewed Deborah Paul on several occasions. During those interviews, she provided me with original checks that were returned to Carol's Tours by West Bend Savings Bank after the checks cleared through the Carol's Tours account. Paul indicated that she was frequently on the road on trips and that as a result Hopper came to run everything in the business. Paul indicated that as part of Hopper's duties, Hopper faxed a copy of the Carol's Tours check register to Stephen Kjer each month. Paul indicated Hopper had check-signing authority for the Carol's Tours checking account. I believe the information provided by Paul to be true and reliable to the extent that it is based upon personal knowledge and is independently verified by business and financial records kept in the ordinary course of business.

I have reviewed a copy of a videotaped interview of Lisa Hopper by Detective Ryan Klavekoske of the Beaver Dam Police Department in August, 2008. I believe the video is a true and accurate representation of that interview because it was produced and maintained by the Beaver Dam Police Department in the course of its operations as a law enforcement agency.

During that interview, Hopper indicated that she was employed as the office manager at Carol's Tours for six years and her last day was December 7, 2007. Hopper stated that Deborah Paul kept adding more and more responsibilities to Hopper's duties as office manager.

Based upon interviews conducted by law enforcement with Paul, Hopper and other Carol's Tours employees, I know that the general duties of the office manager at Carol's Tours included billing, taking in money from clients, writing checks and entering information in the corporation's check register, sending reports to the accountant, and making deposits.

When interviewed, Hopper was told that she was being interviewed about what had caused Carol's Tours to end its business. Hopper responded, "I probably know more than anybody." Hopper described how the business was run and the financial difficulties that Carol's Tours encountered after September 11, 2001. Later in the interview, Hopper said at times she used her personal credit card to pay for some of the expenses for the business. She stated that the business would get calls from agencies advising that if Carol's Tours did not pay for trip tickets immediately, the tickets would be canceled. Hopper said when that happened, she would call Deborah Paul and Paul would ask her to put it on Hopper's personal credit card to be reimbursed the following month. Several former employees of Carol's Tours indicated to law enforcement that on several occasions they witnessed Hopper using her own credit card to pay for a Carol's Tours business expense.

According to Hopper, Paul would not pay her back and Hopper got in way over her head and it got to the point where she could not make her house payments and almost lost her husband over it. Hopper said she had been using her personal credit cards to help out Carol's Tours for over four years. When asked how much she had incurred on her personal credit cards to assist Paul in the business, Hopper became hesitant to answer the question. She indicated they were her personal finances and she almost lost her marriage over the fact of using her credit cards to pay Carol's Tours expenses, her husband is a very private person, and she did not feel

comfortable sharing the information. When asked if she could estimate how much Paul had reimbursed her for business expenses paid for with Hopper's credit cards, Hopper said Paul reimbursed her approximately 60% to 70%, or at least over 50%.

Hopper said there were days when Paul would ask her to take Paul's mother, Carol Smith, shopping. Hopper indicated that Paul would ask Hopper to purchase items for Smith using Hopper's own credit cards. I know based upon information provided by Deborah Paul that Smith died in October, 2004.

Hopper stated that she had records to prove what expenses she paid on behalf of Carol's Tours. She then said, "Well, I don't personally have them but I can get them." She then went on to say, "I made damn sure when I used my credit card somebody was sitting there." She then said it didn't always happen as there was not somebody there but when there was somebody she made sure somebody was with her when she was using her personal credit card for business.

I have reviewed copies of bank statements for 2006 through 2007 for the accounts of Lisa and Richard Hopper at Dodge Central Credit Union which were provided pursuant to subpoena. I believe the records are accurate and reliable because they are maintained by Dodge Central Credit Union in the ordinary course of its business as a financial institution. Based upon my review of those records, I know that the Hoppers' had nearly 100 checks returned for non-sufficient funds between 2006 and 2007.

Based on my review of West Bend Savings bank and Carol's Tours records, I know that Carol's Tours had one business checking account and that account was at West Bend Savings Bank, in the city of Beaver Dam Wisconsin. In review of financial and business records, I found a pattern where some Carol's Tours checks were written to pay Lisa Hopper's bills but were entered into the check register as having been written to entities with which Carol's Tours did business. I further found that many of the checks that were used to pay Hopper's bills were altered after they cleared the bank and were returned to Carol's Tours. The alterations included

changes to the payee or additions to the memo lines to make them look as if they had been used to pay legitimate Carol's Tours expenses. Many of these altered checks appear to contain a signature that says "L. Hopper" or "Lisa Hopper." Others of these checks contain the signature "Debbie Paul" but Deborah Paul has indicated that those signatures are not hers.

The altered checks I found were all used to pay Hopper's bills, not Deborah Paul's or any other employee's bills. Based upon all of the records I reviewed in this case, the amount of Carol's Tours funds Hopper used for her own personal use exceeded \$90,000.00. The exact amount cannot be determined due to the number of transactions involved, the age of the transactions and the lack of records in certain circumstances.

Checks to Citi Mortgage

Based upon my review of records of the U.S. Bankruptcy Court, I know that Richard and Lisa Hopper listed one of their debts as a home mortgage with Citi Mortgage. The account number listed in those records is 00064264765. Based upon my review of bank records and Carol's Tours records, I know that between December 28, 2004, and May 4, 2007, there were approximately twenty checks paid from Carol's Tours checking account to the Hoppers' Citi Mortgage account number 00064264765. The total amount of those checks was \$23,425.00. Most of the checks were made payable to "Citi" but were listed in the Carol's Tours check register as having a different payee. For example, check number 13844 for \$1,090.00, which was dated May 4, 2007, was made payable to Citi and the cancelled check had the Hoppers' mortgage account number sprayed on the back. However, the Carol's Tours check register lists check number 13844 as payable to Drury Inn Hotel, a legitimate establishment with which Carol's Tours did business.

Checks to Capital One

Based upon my review of bankruptcy court records and records subpoenaed from Capital One Bank, I know that Richard and Lisa Hopper had credit cards with Capital One. I further know, based upon a review of those records and a review of bank records for Carol's Tours and other company records, that twenty-three checks were written from Carol's Tours checking account to pay one of the Hoppers' credit cards with Capital One. The checks ranged in date from February 12, 2004, to May 5, 2007. I received copies of credit card statements for the Hoppers from Capital One pursuant to a subpoena. Based upon my review of those statements, giving the benefit of the doubt to any purchases that might have arguably been made for Carol's Tours, I believe the amount of money used from the Carol's Tours bank accounts to pay Hoppers' personal credit card expenses with Capital One was \$14,823.74.

Checks to Bank of America

I have reviewed records produced by Bank of America pursuant to subpoena. I believe those records are accurate and reliable because they are maintained by Bank of America in the ordinary course of its business as a financial institution. Based upon those records and the records of the U.S. Bankruptcy Court, I know that Lisa and Richard Hopper had credit cards with Bank of America with an outstanding balance of \$14,809 at the time of the bankruptcy filing. I know, based upon a review of West Bend Savings Bank records that between September 26, 2005, and May 14, 2007, that nine checks from Carol's Tours checking account totaling \$23,085.00 were used to pay Lisa and Richard Hopper's Bank of America credit card. Each of the nine checks was listed in the Carol's Tours check register as having a different payee than Bank of America. For example, check number 12297 dated September 26, 2005, in the amount of \$4,500.00 and check number 12490 dated December 4, 2005, in the amount of \$5,000.00 were

both listed in the Carol's Tours check register as payable to Riteway, which is a bus company used by Carol's Tours. The signature on both checks is "L. Hopper."

A number of the other checks used to pay Hopper's Bank of America account also showed entries in the check register provided to Kjer that indicated they were made payable to entities other than Bank of America. These entities included EP Direct, WI Coach and Lamers, all companies with which Carol's Tours did legitimate business.

Giving Hopper the benefit of any purchases that might have arguably been made for Carol's Tours, I believe the amount of money used from the Carol's Tours bank accounts to pay Hopper's personal credit card expenses with Bank of America was \$14,255.55.

Checks for phone service

Based on my review of original checks provided by Deborah Paul and records provided by West Bend Savings Bank, I know that eight checks dated between December 16, 2002 and March 15, 2007 were drawn on Carol's Tours checking account and made out to Ameritech, SBC or AT&T. On the back of these checks was a spray code indicating what account was paid. On these eight checks, the account number sprayed on the back corresponded to Hopper's home telephone number. The checks total \$2,528.92.

Other miscellaneous checks

The checks described above do not constitute all of the checks that Hopper used to pay her personal expenses. I found numerous other checks to various payees that fit the same patterns described above.

For example, based on my review of West Bend Saving records, I know that in January 2006, check number 12460 was drawn on the Carol's Tours checking account. The copy of the check that is on file with West Bend Savings Bank appears to be dated January 23, 2006, and is made out to "MCPS" in the amount of \$1,600. The check purports to be signed by Debbie Paul. According to bank records, the check cleared the account on January 30, 2006. The back of the

check contains an endorsement from Midwestern Center for Plastic Surgery. I have reviewed the actual check that cleared, which was provided to me by Paul. On the cleared check, it appears that the number one has been added to the date to make it look as though the check was dated November 23, 2006. In addition, the payee line on the cleared check reads "(MCPS) Crowne Plaza Hotel," and the word "Balance" was added to the memo line, suggesting that someone altered the check after it cleared. I have interviewed Paul regarding this check. She indicated the signature on this check is not hers. She also indicated that she knows that Hopper had liposuction done previously. Hopper had told her that her husband had given her a choice between having liposuction or a "boob job" and that he had paid for it.

I have received records from the Midwestern Center for Plastic Surgery, which were produced pursuant to subpoena. Those records indicate that a payment of \$1,600 was made to MCPS on January 23, 2006, for patient Lisa Hopper. The records indicate payment was made by check number 5728. There is no check by that number in the Carol's Tours bank records for 2006. In light of the cancelled check for \$1,600.00 dated January 23, 2006, that was endorsed by MCPS, and the MCPS records showing a payment on that date in that amount for Lisa Hopper, I believe that Carol's Tours check number 12460 was used to pay for plastic surgery services for Lisa Hopper.

Based on my review of the Carol's Tours' check register, I know that the payee and amount was left blank for check 12460 in the register.

The additional checks I found that were used for Hopper's personal expenses total at least \$12,000.00.

Dated this 9th day of November, 2011.



KYRA M. SCHALLHORN
Special Agent, Division of Criminal Investigation
Wisconsin Department of Justice

Subscribed and sworn to before me,
and approved for filing,
this 9th day of November, 2011.



RICHARD J. DUFOUR
Assistant Attorney General and
Special Prosecutor for Dodge County
State Bar #1014811
My commission is permanent.

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