

FILED

08-27-2025

Clerk of Circuit Court

Waukesha County

2025CF001435

STATE OF WISCONSIN**CIRCUIT COURT****WAUKESHA COUNTY**

STATE OF WISCONSIN

Plaintiff,

vs.

DA Case No.: 2025WK003538

Assigned DA/ADA: Jack Rieder

Agency Case No.: B25007859

Court Case No.:

ATN: 68011000092995

CRIMINAL COMPLAINT

Mathew K Yang
11011 W North Ave #237
Wauwatosa, WI 53226
DOB: 07/16/1994
Sex/Race: M/A
Eye Color: Brown
Hair Color: Black
Height: 5 ft 6 in
Weight: 150 lbs
Alias:

Defendant.

The undersigned, of the Waukesha County District Attorney's Office being first duly sworn on oath, upon information and belief, states that:

Count 1: MISDEMEANOR THEFT

The above-named defendant Between March 1, 2024 and March 31, 2024, at Milwaukee Tool located at 13135 Lisbon Road, in the City of Brookfield, Waukesha County, Wisconsin, did intentionally retain possession of the movable property of Milwaukee Tool, without consent and with intent to permanently deprive the owner of possession of the property, contrary to sec. 943.20(1)(a) and (3)(a), 939.51(3)(a), 973.076(2m) Wis. Stats., a Class A Misdemeanor, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

And furthermore, invoking the provisions of section 973.076(2m) and 973.075, Wisconsin Statutes, upon conviction the court shall order the defendant to forfeit \$602.91 U.S. Currency used in the course of, intended for use in the course of, or directly or indirectly derived from or realized through the commission of any crime.

Count 2: MISDEMEANOR THEFT

The above-named defendant between April 1, 2024 and April 30, 2024, at Milwaukee Tool located at 13135 Lisbon Road, in the City of Brookfield, Waukesha County, Wisconsin, did intentionally retain possession of the movable property of Milwaukee Tool, without consent and with intent to permanently deprive the owner of possession of the property, contrary to sec. 943.20(1)(a) and (3)(a), 939.51(3)(a), 973.076(2m) Wis. Stats., a Class A Misdemeanor, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

STATE OF WISCONSIN - VS - Mathew K Yang

And furthermore, invoking the provisions of section 973.076(2m) and 973.075, Wisconsin Statutes, upon conviction the court shall order the defendant to forfeit \$575.15 U.S. Currency used in the course of, intended for use in the course of, or directly or indirectly derived from or realized through the commission of any crime.

Count 3: THEFT - MOVABLE PROPERTY (> \$5000 - \$10,000)

The above-named defendant between May 1, 2024 and May 31, 2024, at Milwaukee Tool located at 13135 Lisbon Road, in the City of Brookfield, Waukesha County, Wisconsin, did intentionally retain possession of movable property of Milwaukee Tool, having a value greater than \$5000 but less than \$10,000, without consent, and with intent to permanently deprive the owner of possession of the property, contrary to sec. 943.20(1)(a) and (3)(bm), 939.50(3)(h), 973.076(2m) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

And furthermore, invoking the provisions of section 973.076(2m) and 973.075, Wisconsin Statutes, upon conviction the court shall order the defendant to forfeit \$9,662.59 U.S. Currency used in the course of, intended for use in the course of, or directly or indirectly derived from or realized through the commission of any crime.

Count 4: THEFT - MOVABLE PROPERTY (> \$10,000 - \$100,000)

The above-named defendant between June 1, 2024 and June 30, 2024, at Milwaukee Tool located at 13135 Lisbon Road, in the City of Brookfield, Waukesha County, Wisconsin, did intentionally retain possession of movable property of Milwaukee Tool, having a value greater than \$10,000 but does not exceed \$100,000, without consent, and with intent to permanently deprive the owner of possession of the property, contrary to sec. 943.20(1)(a) and (3)(c), 939.50(3)(g), 973.076(2m) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

And furthermore, invoking the provisions of section 973.076(2m) and 973.075, Wisconsin Statutes, upon conviction the court shall order the defendant to forfeit \$19,599.85 U.S. Currency used in the course of, intended for use in the course of, or directly or indirectly derived from or realized through the commission of any crime.

Count 5: MISDEMEANOR THEFT

The above-named defendant between July 1, 2024 and July 31, 2024, at Milwaukee Tool located at 13135 Lisbon Road, in the City of Brookfield, Waukesha County, Wisconsin, did intentionally retain possession of the movable property of Milwaukee Tool, without consent and with intent to permanently deprive the owner of possession of the property, contrary to sec. 943.20(1)(a) and (3)(a), 939.51(3)(a) Wis. Stats., a Class A Misdemeanor, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

And furthermore, invoking the provisions of section 973.076(2m) and 973.075, Wisconsin Statutes, upon conviction the court shall order the defendant to forfeit \$1,378.58 U.S. Currency

STATE OF WISCONSIN - VS - Mathew K Yang

used in the course of, intended for use in the course of, or directly or indirectly derived from or realized through the commission of any crime.

Count 6: THEFT - MOVABLE PROPERTY (> \$10,000 - \$100,000)

The above-named defendant between August 1, 2024 and August 31, 2024, at Milwaukee Tool located at 13135 Lisbon Road, in the City of Brookfield, Waukesha County, Wisconsin, did intentionally retain possession of movable property of Milwaukee Tool, having a value greater than \$10,000 but does not exceed \$100,000, without consent, and with intent to permanently deprive the owner of possession of the property, contrary to sec. 943.20(1)(a) and (3)(c), 939.50(3)(g), 973.076(2m) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

And furthermore, invoking the provisions of section 973.076(2m) and 973.075, Wisconsin Statutes, upon conviction the court shall order the defendant to forfeit \$30,397.75 U.S. Currency used in the course of, intended for use in the course of, or directly or indirectly derived from or realized through the commission of any crime.

Count 7: THEFT - MOVABLE PROPERTY (> \$10,000 - \$100,000)

The above-named defendant between September 1, 2024 and September 30, 2024, at Milwaukee Tool located at 13135 Lisbon Road, in the City of Brookfield, Waukesha County, Wisconsin, did intentionally retain possession of movable property of Milwaukee Tool, having a value greater than \$10,000 but does not exceed \$100,000, without consent, and with intent to permanently deprive the owner of possession of the property, contrary to sec. 943.20(1)(a) and (3)(c), 939.50(3)(g), 973.076(2m) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

And furthermore, invoking the provisions of section 973.076(2m) and 973.075, Wisconsin Statutes, upon conviction the court shall order the defendant to forfeit \$19,119.51 U.S. Currency used in the course of, intended for use in the course of, or directly or indirectly derived from or realized through the commission of any crime.

Count 8: THEFT - MOVABLE PROPERTY (> \$5000 - \$10,000)

The above-named defendant between October 1, 2024 and October 31, 2024, at Milwaukee Tool located at 13135 Lisbon Road, in the City of Brookfield, Waukesha County, Wisconsin, did intentionally retain possession of movable property of Milwaukee Tool, having a value greater than \$5000 but less than \$10,000, without consent, and with intent to permanently deprive the owner of possession of the property, contrary to sec. 943.20(1)(a) and (3)(bm), 939.50(3)(h), 973.076(2m) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

And furthermore, invoking the provisions of section 973.076(2m) and 973.075, Wisconsin Statutes, upon conviction the court shall order the defendant to forfeit \$5,405.05 U.S. Currency

STATE OF WISCONSIN - VS - Mathew K Yang

used in the course of, intended for use in the course of, or directly or indirectly derived from or realized through the commission of any crime.

Count 9: THEFT - MOVABLE PROPERTY (> \$10,000 - \$100,000)

The above-named defendant between November 1, 2024 and November 30, 2024, at Milwaukee Tool located at 13135 Lisbon Road, in the City of Brookfield, Waukesha County, Wisconsin, did intentionally retain possession of movable property of Milwaukee Tool, having a value greater than \$10,000 but does not exceed \$100,000, without consent, and with intent to permanently deprive the owner of possession of the property, contrary to sec. 943.20(1)(a) and (3)(c), 939.50(3)(g), 973.076(2m) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

And furthermore, invoking the provisions of section 973.076(2m) and 973.075, Wisconsin Statutes, upon conviction the court shall order the defendant to forfeit \$48,463.11 U.S. Currency used in the course of, intended for use in the course of, or directly or indirectly derived from or realized through the commission of any crime.

Count 10: THEFT - MOVABLE PROPERTY (> \$10,000 - \$100,000)

The above-named defendant between December 1, 2024 and December 31, 2024, at Milwaukee Tool located at 13135 Lisbon Road, in the City of Brookfield, Waukesha County, Wisconsin, did intentionally retain possession of movable property of Milwaukee Tool, having a value greater than \$10,000 but does not exceed \$100,000, without consent, and with intent to permanently deprive the owner of possession of the property, contrary to sec. 943.20(1)(a) and (3)(c), 939.50(3)(g), 973.076(2m) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

And furthermore, invoking the provisions of section 973.076(2m) and 973.075, Wisconsin Statutes, upon conviction the court shall order the defendant to forfeit \$54,740.57 U.S. Currency used in the course of, intended for use in the course of, or directly or indirectly derived from or realized through the commission of any crime.

Count 11: THEFT - MOVABLE PROPERTY (> \$10,000 - \$100,000)

The above-named defendant between January 1, 2025 and January 31, 2025, at Milwaukee Tool located at 13135 Lisbon Road, in the City of Brookfield, Waukesha County, Wisconsin, did intentionally retain possession of movable property of Milwaukee Tool, having a value greater than \$10,000 but does not exceed \$100,000, without consent, and with intent to permanently deprive the owner of possession of the property, contrary to sec. 943.20(1)(a) and (3)(c), 939.50(3)(g), 973.076(2m) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

And furthermore, invoking the provisions of section 973.076(2m) and 973.075, Wisconsin Statutes, upon conviction the court shall order the defendant to forfeit \$96,253.46 U.S.

STATE OF WISCONSIN - VS - Mathew K Yang

Currency used in the course of, intended for use in the course of, or directly or indirectly derived from or realized through the commission of any crime.

Count 12: THEFT - MOVABLE PROPERTY (> \$10,000 - \$100,000)

The above-named defendant between February 1, 2025 and February 28, 2025, at Milwaukee Tool located at 13135 Lisbon Road, in the City of Brookfield, Waukesha County, Wisconsin, did intentionally retain possession of movable property of Milwaukee Tool, having a value greater than \$10,000 but does not exceed \$100,000, without consent, and with intent to permanently deprive the owner of possession of the property, contrary to sec. 943.20(1)(a) and (3)(c), 939.50(3)(g), 973.076(2m) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

And furthermore, invoking the provisions of section 973.076(2m) and 973.075, Wisconsin Statutes, upon conviction the court shall order the defendant to forfeit \$89,829.41 U.S. Currency used in the course of, intended for use in the course of, or directly or indirectly derived from or realized through the commission of any crime.

Count 13: THEFT - MOVABLE PROPERTY (>\$100,000)

The above-named defendant between March 1, 2025 and March 31, 2025, at Milwaukee Tool, located at 13135 Lisbon Road, in the City of Brookfield, Waukesha County, Wisconsin, did intentionally retain possession of movable property of Milwaukee Tool, having a value that exceeds \$100,000, without consent, and with intent to permanently deprive the owner of possession of the property, contrary to sec. 943.20(1)(a) and (3)(cm), 939.50(3)(f), 973.076(2m) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

And furthermore, invoking the provisions of section 973.076(2m) and 973.075, Wisconsin Statutes, upon conviction the court shall order the defendant to forfeit \$710,235.91 U.S. Currency used in the course of, intended for use in the course of, or directly or indirectly derived from or realized through the commission of any crime.

Count 14: COMPUTER CRIMES - MODIFY DATA

The above-named defendant between March 1, 2024 and April 1, 2025, at Milwaukee Tool, located at 13135 Lisbon Road, in the City of Brookfield, Waukesha County, Wisconsin, to defraud or obtain property, did willfully, knowingly and without authorization, modify data, contrary to sec. 943.70(2)(a)1 and (2)(b)2, 939.50(3)(i) Wis. Stats., a Class I Felony, and upon conviction 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.

PROBABLE CAUSE:

And prays that the defendant be dealt with according to law; that the basis for complainant's charge of such offense is: Relying on the investigative reports of various officers with the City of Brookfield Police Department.

STATE OF WISCONSIN - VS - Mathew K. Yang

On April 4, 2025, at approximately 2:50 PM, Officer Lauda made telephone contact with Kristen Spaight—a representative of Milwaukee Tool—who wanted to report a theft of product from the business by a former employee. Milwaukee Tool is headquartered at 13135 W. Lisbon Road in Brookfield. The former employee allegedly responsible for the theft was identified as Mathew Yang: the above-defendant.

Spaight informed Officer Lauda that the defendant had been terminated on April 1, 2025 after the company learned he had been falsifying records by creating work orders for the delivery of Milwaukee Tool products and then manually deleting the orders from the company system. Spaight claimed the defendant had been doing this over the preceding year and claimed the company had been deprived of at least 1.3 million dollars in product as a result. Spaight indicated the company became aware of the issue after a carrier contacted Milwaukee Tool to inquire about the delivery of 9,000 pounds of product to a residential address in Wauwatosa. The residential address in question was later identified as the defendant's listed residential address with the Wisconsin Department of Transportation.

After taking Spaight's initial statement, Officer Lauda responded directly to Milwaukee Tool where he spoke further with Spaight as well as the Ashley Becker, a senior vice president. According the these two individuals, the defendant had been with Milwaukee Tool for approximately 8 years. The defendant began working in the supply line aspect of the company before moving into the IT department in 2023.

Milwaukee Tool launched an internal investigation after being contacted by the forementioned carrier and being unable to locate the associated order in their ordering system. That internal investigation revealed the defendant had placed more than 110 separate orders using his personal customer account number which he later deleted from Milwaukee Tool system. These orders were sent to various addresses including the defendant's residential address as well as at least one other address associated with the defendant's sister.

Spaight and Becker were able to provide Officer Lauda with excel spreadsheets documenting all of the fraudulent orders linked to the defendant as a result of Milwaukee Tool's internal investigation. While looking through the excel files, Officer Lauda observed that the number of fraudulent ordered increased significantly between January and March of 2025. When asked about this, Spaight and Becker indicated it may because, around that time, Milwaukee Tool had announced that a company employee discount system would be shutting down in April of 2025.

Subsequent Investigation

Detective Skemp was tasked with conducting follow-up investigation into this matter. On May 16, 2025, Detective Skemp met with Spaight and Becker as well as a Milwaukee Tool accounting specialist (Conor Clair) and an IT specialist (Adam Staude) who were involved in investigating the thefts.

STATE OF WISCONSIN - VS - Mathew K Yang

The investigating team reiterated that the defendant had originally worked in the Customer Supply Chain which gave him intimate knowledge of the company's ordering system. The defendant then transitioned to the IT team where he worked with other Customer Supply Chain team members. The investigating team advised that, because of his level of access and extensive knowledge of the company's ordering system, the defendant had been able to manipulate the ordering system to create orders that would then be fulfilled and prepared by the warehouse for shipping. Company computer records confirmed the defendant would then delete the order information prior to any payments being processed, so no payment was ever rendered for the orders the defendant placed. Staude was able to confirm that Milwaukee Tool's internal computer system logs cannot be modified. These computer logs detailed that the defendant was responsible for both creating and then deleting the orders in question.

The investigating team confirmed that the defendant had created and deleted 115 orders between late March of 2024 and March of 2025. Your complainant's review of Milwaukee Tool's records revealed the first fraudulent order was placed on March 26, 2024. Of those orders, 109 shipments were delivered. Milwaukee Tool had been able to cancel and recover six of the shipments. In total, the defendant ordered \$1,443,948.46 worth of product; however, Milwaukee Tool was able to cancel and recoup \$357,684.61 worth of product resulting in a total loss of \$1,086,263.85. A breakdown of the defendant's aggregate thefts by month is included below. Forfeiture amounts for each count are based on the value of the stolen merchandise according to Milwaukee Tool.

Month	Number of Orders	Aggregate Loss
March-2024	1	\$602.91
April-2024	2	\$575.15
May-2024	3	\$9,662.59
June-2024	6	\$19,599.85
July-2024	5	\$1,378.58
August-2024	10	\$30,397.75
September-2024	9	\$19,119.51
October-2024	11	\$5,405.05
November-2024	6	\$48,463.11
December-2024	11	\$54,740.57
January-2025	13	\$96,253.46
February-2025	11	\$89,829.41
March-2025	27	\$710,235.91

In addition to the internal logs of the defendant's ordering activity, the investigating team advised they had located a separate excel spreadsheet entitled "selling list" on the defendant's company laptop following his termination. That spreadsheet included a breakdown of the retail costs of various Milwaukee Tool products, the "myconnect price" of the products, and then the "selling price" of the products. Spaight confirmed that "myconnect" is the name Milwaukee Tool

STATE OF WISCONSIN - VS - Mathew K Yang

uses for its employee discount program. There were also tabs in the defendant's spreadsheet identified as "order tabs" which contained pricing and totals for various orders.

Because of the defendant's employment position, the investigative team confirmed he would have had direct access to and, at times, direct contact with Milwaukee Tool's legitimate customer base. This fact, in conjunction with the quantity of tools involved in the theft and the excel spreadsheet located on the defendant's company laptop, led the investigative team to conclude the defendant may have been selling the stolen products directly to Milwaukee Tool business customers.

Defendant's Bank Account

Spaight provided Detective Skemp with the Associated Bank account number the defendant had on file for direct deposit. Detective Skemp subsequently obtained copies of bank records detailing the defendant's transaction history and account balance between March 11, 2024 and June 9, 2025. Those bank records also confirmed the defendant is the named account holder.

Your complainant's review of the defendant's bank records revealed that while perpetrating the forementioned thefts between March of 2024 and March of 2025, the defendant's bank account balance rose at a commensurate rate. For instance, between March 11, 2024 and April 1, 2024, the defendant's average account balance was \$2,044.04. The following year, between March 3, 2025 and April 1, 2025, that number had risen to \$130,914.38.

Potawatomi Casino Records

On June 25, 2025, Detectives Skemp and Behnke made contact with the defendant at his listed residential address in Wauwatosa. Of note, this is one of the various addresses the defendant fraudulently ordered products on multiple occasions. The defendant was ultimately placed under arrest for theft.

During a search incident to arrest of the defendant, Detective Skemp located a Potawatomi Casino "Blaze" rewards card in the defendant's wallet. Detective Skemp was able to confirm that "Blaze" is the second highest rewards level offered by Potawatomi Casino just below the "Invitation Only" level. Detective Skemp also located a membership card for American Place Casino in Waukegan, Illinois in the defendant's wallet.

Detective Skemp was able to obtain the defendant's player records from Potawatomi Casino. A review of those records revealed the defendant visited Potawatomi Casino on 140 separate days between January 1, 2024 and June 7, 2025. During that period, the defendant lost \$67,016.40. Additionally, during that period, the amount the defendant was wagering increased significantly. For instance, on January 18, 2024, the aggregate amount of "coin" wagered by the defendant at Potawatomi Casino slot machines was \$212.00. On January 18, 2025, that number was \$86,318.00.

STATE OF WISCONSIN - VS - Mathew K Yang

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

JR/hs/ap

EXT=CODE 1

Subscribed and sworn to before me on
08/27/25

Electronically Signed By:

Vivien Morris

Assistant District Attorney

State Bar #: 1124481

Electronically Signed By:

ADA Jack Rieder

Complainant