

State of Minnesota  
County of Blue Earth

District Court  
5th Judicial District

Prosecutor File No.  
Court File No.

MAN-15-0279  
07-CR-15-1850

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**State of Minnesota,**

Plaintiff,

vs.

**KRISTIE LYNN HARROUN DOB: 07/21/1978**

2009 Hoffman Road  
Mankato, MN 56001

Defendant.

**COMPLAINT**

Summons

Amended

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The Complainant submits this complaint to the Court and states that there is probable cause to believe Defendant committed the following offense(s):

**COUNT I**

**Charge: Theft-Take/Use/Transfer Movable Prop-No Consent**

Minnesota Statute: 609.52.2(a)(1)

Maximum Sentence: 90 days and/or \$1,000

Offense Level: Misdemeanor

Offense Date (on or about): 02/14/2015

Control #(ICR#): 15004619

Charge Description: Said Defendant, Kristie Lynn Haroun, did unlawfully and without claim of right, take, use, transfer, conceal, or retain possession of the movable property of another without the other's consent and with intent to deprive the owner permanently of possession of the property, to-wit: the value of the property or services is less than \$500.

## STATEMENT OF PROBABLE CAUSE

Complainant is an Officer with the Mankato Police Department who believes the information set out below is true and accurate based on reports and information submitted to the Officer by Officer Wayne Terry and others identified herein.

Michael Rieken, HR Director of the YMCA, 1401 South Riverfront Drive in the city of Mankato, Blue Earth County, Minnesota, reported the theft of batteries from that location on February 14, 2015. Rieken reported to Officer Terry that Kristie Lynn Haroun, the defendant herein, had entered the YMCA at approximately 5:10 pm and while there had checked out and returned equipment. At approximately 6:13 pm, the defendant is seen on video in the hallway outside of the racketball courts examining a shipment of supplies stacked in the hallway. The defendant is seen on video examining a case of Duracell Procell Batteries, looking inside another box on top of the stack and then taking the case of batteries and concealing them in her large handbag. The defendant is then seen leaving the hallway and exiting the YMCA at 6:17 pm. Rieken stated he is confident the suspect seen on surveillance taking the batteries is the same person he spoke with when she entered the building as well as when she both checked out and returned equipment. Officer Terry states he attempted contacting the defendant at several phone numbers and addresses. On March 5, 2015, he went to 2009 Hoffman Road and knocked on the door and rang the doorbell several times; however no one answered the door. Officer Terry states there were two vehicles at the residence, one being a Chevrolet Impala registered to the defendant.

The case of Duracell Procell batteries taken by the defendant is valued at \$66.91. Restitution is requested.

## SIGNATURES AND APPROVALS

Complainant requests that Defendant, subject to bail or conditions of release, be:  
(1) arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or  
(2) detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.

Complainant declares under penalty of perjury that everything stated in this document is true and correct. Minn. Stat. § 358.116; Minn. R. Crim. P. 2.01, subds. 1, 2.

**Complainant**

Justin Neumann  
Sergeant  
710 S Front St  
Mankato, MN 56001-3803  
Badge: 3110

Electronically Signed:  
03/16/2016 05:07 PM  
Blue Earth County, Minnesota

Being authorized to prosecute the offenses charged, I approve this complaint.

**Prosecuting Attorney**

Christopher Cain  
Assistant Blue Earth County  
Attorney  
401 Carver Road  
PO Box 3129  
Mankato, MN 56002-3129  
(507) 304-4600

Electronically Signed:  
03/15/2016 01:58 PM

**FINDING OF PROBABLE CAUSE**

From the above sworn facts, and any supporting affidavits or supplemental sworn testimony, I, the Issuing Officer, have determined that probable cause exists to support, subject to bail or conditions of release where applicable, Defendant's arrest or other lawful steps be taken to obtain Defendant's appearance in court, or Defendant's detention, if already in custody, pending further proceedings. Defendant is therefore charged with the above-stated offense(s).

**SUMMONS**

THEREFORE YOU, THE DEFENDANT, ARE SUMMONED to appear on \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ AM/PM before the above-named court at 401 Carver Rd, Mankato, MN 56002-0347 to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

**WARRANT**

To the Sheriff of the above-named county; or other person authorized to execute this warrant: I order, in the name of the State of Minnesota, that the Defendant be apprehended and arrested without delay and brought promptly before the court (if in session), and if not, before a Judge or Judicial Officer of such court without unnecessary delay, and in any event not later than 36 hours after the arrest or as soon as such Judge or Judicial Officer is available to be dealt with according to law.

*Execute in MN Only*

*Execute Nationwide*

*Execute in Border States*

**ORDER OF DETENTION**

Since the Defendant is already in custody, I order, subject to bail or conditions of release, that the Defendant continue to be detained pending further proceedings.

Bail: \$  
Conditions of Release:

This complaint, duly subscribed and sworn to or signed under penalty of perjury, is issued by the undersigned Judicial Officer as of the following date: March 17, 2016.

**Judicial Officer**

Richard C. Perkins  
Judge of District Court

Electronically Signed: 03/17/2016 08:52 AM

Sworn testimony has been given before the Judicial Officer by the following witnesses:

**COUNTY OF BLUE EARTH  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**KRISTIE LYNN HARROUN**

Defendant

**LAW ENFORCEMENT OFFICER RETURN OF SERVICE**  
*I hereby Certify and Return that I have served a copy of this  
Summons upon the Defendant herein named.*

Signature of Authorized Service Agent: