

State of Minnesota
County of Blue Earth

District Court
5th Judicial District

Prosecutor File No.
Court File No.

BEC-15-1600
07-CR-15-4986

State of Minnesota,
Plaintiff,

COMPLAINT
Summons

vs.

KASHIF HUSSAIN KHAN DOB: 01/12/1981

20499 555th Lane
Mankato, MN 56001

Defendant.

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: Motor Vehicle Registration - Intent to Escape Tax

Minnesota Statute: 168.35, with reference to: 609.05.1

Maximum Sentence: 1 year and/or \$3,000

Offense Level: Gross Misdemeanor

Offense Date (on or about): 10/25/2015

Control #(ICR#): 15014315

Charge Description: Kashif Hussain Khan

On or about October 25, 2015, in the County of Blue Earth, said Defendant, Kashif Hussain Khan did intentionally aid, advise, hire, counsel, or conspire with, or otherwise procure another to commit the crime, and/or did personally commit said crime; to wit: did with intent to escape payment of any tax on a motor vehicle, delayed or neglected to properly list and apply to register the same, or with intent to prevent the payment or collection of the proper tax, fee, or lien thereon, violated or neglected to comply with any of the provisions of MN Statute Section 168.

STATEMENT OF PROBABLE CAUSE

On October 25, 2015, at approximately 4:01 p.m., Deputy Welle, of the Blue Earth County Sheriff's Office, was patrolling westbound on County Road 90 in Blue Earth County when Deputy Welle ran a random license plate check of a vehicle that passed Deputy Welle heading east. The registration of the vehicle came back as September 2014. Deputy Welle turned around and caught up with the vehicle and initiated a traffic stop.

Deputy Welle noticed that the registration sticker on the vehicle showed 2016 but came back in the State system as 2014. Deputy Welle approached the vehicle and contacted the driver, T.F., an adult male. Deputy Welle advised T.F. for the reason of the stop, and T.F. informed Deputy Welle that the vehicle belonged to T.F.'s cousin. T.F.'s cousin was identified as Kashif Hussain Khan (D.O.B. 01/12/1981). T.F. told Deputy Welle that T.F. was just using the vehicle to go to Mankato to get food. T.F. further stated that Khan was letting T.F. use the vehicle. Deputy Welle ran a sticker check on the 2016 registration sticker and was informed by Dispatch that the 2016 sticker belonged on a 1981 trailer that was recently sold. Deputy Welle learned that the trailer the sticker came from was registered to Khan. Deputy Welle saw that the vehicle that Deputy Welle had just stopped also belonged to Khan. Deputy Welle noted that it appeared that the 2016 registration sticker was used on the vehicle to avoid having to buy new registration for it. Deputy Welle also noted that trailers have only one license plate and motor vehicles have two, which takes away the possibility that the sticker was just accidentally mixed up with others.

Deputy Welle informed T.F. that since T.F. was not the registered owner Deputy Welle was not going to give T.F. a citation at this time. Deputy Welle instead intended to follow up with the registered owner, Khan. Deputy Welle took the 2016 registration sticker off of the vehicle and told T.F. to drive straight back to Khan's house.

On November 8, 2015, Deputy Welle met with Khan and spoke about the registration discrepancy. Deputy Welle recognized Khan from a previous traffic stop where Khan did not have a front license plate on an SUV Khan was driving. Deputy Welle informed Khan of why Deputy Welle was there and Khan got very defensive and noticeably nervous. Khan said that Khan would never do something like switch the tabs. Khan said that Khan is a very respected member of society and Khan did not like the fact that Deputy Welle came to Khan's house and was accusing Khan of things. Khan stated that when Deputy Welle stopped the vehicle that T.F. was driving, that Khan still owned it but that Khan sold the vehicle to T.F. the following day. Deputy Welle asked Khan about putting the trailer registration on the vehicle, and Khan said Khan did not know anything about it and did not know how it could have happened. Khan went on to say that Khan has a lot of vehicles and they are all legal. Deputy Welle looked and saw the SUV that Deputy Welle had previously stopped and asked Khan about the front license plate on it. Khan said that Khan has not put the front plate on yet, which Deputy Welle noted rendered the vehicle still illegal to drive on public roads.

Deputy Welle contacted T.F. and again asked T.F. about the vehicle's registration. T.F. reaffirmed that T.F.'s cousin, Khan, let T.F. drive it and the 2016 sticker was already on the vehicle when T.F. used it.

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

Richard Murry
Captain
401 Carver Rd
Mankato, MN 56002-0228
Badge: 2708

Electronically Signed:
12/07/2015 11:41 AM
Blue Earth County, MN

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

Prosecuting Attorney

Ryan S. Hansch
401 Carver Road
PO Box 3129
Mankato, MN 56002
(507) 304-4600

Electronically Signed:
12/07/2015 11:08 AM

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 **January 7, 2016 at 2:00 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: December 8, 2015.

Judicial Officer

Krista J Jass
Judge of District Court

Electronically Signed: 12/08/2015 11:19 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.

KASHIF HUSSAIN KHAN

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: