

State of Minnesota
County of Blue Earth

District Court
5th Judicial District

Prosecutor File No.
Court File No.

BEC-16-0152
07-CR-16-438

State of Minnesota,

Plaintiff,

vs.

RODRIGO IBARRA BOWMAN DOB: 09/15/1984

709 5th St NW
Waseca, MN 56093

Defendant.

COMPLAINT

Summons

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: Wrongfully Obtaining Assistance-Theft- By False Stmts,Concealment, Impersonation

Minnesota Statute: 256.98.1(1), with reference to: 609.52.3(3)(d)(iv)

Maximum Sentence: 5 years and/or \$10,000

Offense Level: Felony

Offense Date (on or about): 10/01/2015 to 11/30/2015

Control #(ICR#): 15016332

Charge Description: Rodrigo Ibarra Bowman

On or about and between October 1, 2015 and November 30, 2015, in the County of Blue Earth, said Defendant, Rodrigo Ibarra Bowman did, obtain or attempt to obtain, or aids or abets any person to obtain by means of a willfully false statement or representation, by intentional concealment of any material fact, or by impersonation or other fraudulent device, assistance or the continued receipt of assistance, to include child care assistance or vouchers produced according to sections 145.891 to 145.897 and MinnesotaCare services according to sections 256.9365, 256.94, and 256L.01 to 256L.15, to which the person is not entitled or assistance greater than that to which the person is entitled; and the property consists of public funds belonging to the state or to any political subdivision or agency thereof.

STATEMENT OF PROBABLE CAUSE

Investigator Ginger Peterson, a licensed peace officer in the State of Minnesota currently assigned as a welfare fraud investigator with the Blue Earth County Sheriff's Office, reports that between October 2015 and November 2015, she initiated a fraud investigation involving Rodrigo Bowman. Investigator Peterson learned that Bowman had applied for public assistance in the form of cash assistance on October 5, 2015. As part of that application, he needed to verify his residence for the cash assistance program. Bowman had to complete a 'Shelter Release Form,' which was completed. As part of that form, it had to be signed by the individual who owned the property Bowman resided at. That person was identified as Adult 1 by Bowman.

Investigator Peterson learned, through the course of her investigation, that Adult 1 had not signed that form. Additionally, Investigator Peterson reports that Adult 1 is a vulnerable adult and did not own the residence that Bowman was residing at.

Peterson then reviewed paperwork relating to Bowman's application for benefits and confirmed that Adult 1 did not sign the shelter form. Additionally, she learned from Adult 1 that Bowman was upset because Adult 1 refused to sign the form and her refusal would result in him not receiving approximately \$240.00 in public assistance.

Peterson also reports she compared the signatures of Adult 1 and Bowman on other applications and human services forms maintained by Blue Earth County Human Services and determined that Bowman had forged the signature of Adult 1 in an attempt to receive cash assistance benefits from Blue Earth County.

Peterson further reports that Bowman is knowledgeable of the reporting requirements for the programs that he is on and that he has applied for. Peterson notes that during the time he has been on assistance, he has turned in County forms and applications as well as having been involved in public assistance interviews with financial workers.

Peterson notes, as a matter of standard practice, financial workers advise all recipients of their reporting responsibilities along with supplying recipients with applications that clearly state the reporting responsibilities, penalties, and declarations in order to ensure that all information being reported by the recipients is true and correct the day the applications are turned into the County.

Agent Peterson notes that Bowman was aware that he needed to provide truthful and accurate information in order to remain compliant with the reporting requirements.

Peterson further notes that based on her investigation, Bowman willfully, knowingly, and/or intentionally failed to properly report and/or misrepresented the information he reported in reference to the forged 'Shelter Release Form' in order to receive public assistance benefits.

Specifically, Bowman turned into Blue Earth County Human Services a 'Shelter Release Form' which contained the signature he forged of Adult 1.

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:
02/03/2016 11:48 AM
Blue Earth County, MN

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

Prosecuting Attorney

Christopher Rovney
401 Carver Road
PO Box 3129
Mankato, MN 56002
(507) 304-4600

Electronically Signed:
02/03/2016 10:19 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 **February 25, 2016 at 2:30 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: February 4, 2016.

Judicial Officer Richard C. Perkins
Judge of District Court

Electronically Signed: 02/04/2016 12:11 PM

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.

RODRIGO IBARRA BOWMAN

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: