

State of Minnesota
County of Blue Earth

District Court
5th Judicial District

Prosecutor File No.
Court File No.

BEC-16-0610
07-CR-16-1560

State of Minnesota,

Plaintiff,

vs.

JAREN LEE ALLEN DOB: 09/15/1995

318 Hudson Ave S
Mankato, MN 56001

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: Drugs - Simulated - Manufacture/Sell/Transfer/Deliver-Represent Noncontrolled Subst as Narcotic

Minnesota Statute: 152.097.1(1), with reference to: 152.097.4

Maximum Sentence: 3 years and/or \$20,000

Offense Level: Felony

Offense Date (on or about): 03/08/2016

Control #(ICR#): 16006663

Charge Description: Jaren Lee Allen

On or about March 8, 2016, in the County of Blue Earth, said Defendant, Jaren Lee Allen did knowingly manufacture, sell, transfer, or deliver, or attempt to sell, transfer, or deliver a non-controlled substance upon the expressed representation that the non-controlled substance is a narcotic or non-narcotic controlled substance.

COUNT II

Charge: Drugs - Simulated - Lead to Believe is Controlled Substance - Packaged as Illegal Drug

Minnesota Statute: 152.097.1(3)(i), with reference to: 152.097.4

Maximum Sentence: 3 years and/or \$20,000

Offense Level: Felony

Offense Date (on or about): 03/08/2016

Control #(ICR#): 16006663

Charge Description: Jaren Lee Allen

On or about March 8, 2016, in the County of Blue Earth, said Defendant, Jaren Lee Allen did knowingly

manufacture, sell, transfer, or deliver, or attempt to sell, transfer, or deliver a non-controlled substance under circumstances which would lead a reasonable person to believe that the substance was a controlled substance and the noncontrolled substance was packaged in a manner normally used for the illegal delivery of controlled substances.

COUNT III

Charge: Drugs - Simulated - Amount Charged for Delivery Substantially Exceeds Value of Noncontrolled Subst

Minnesota Statute: 152.097.1(3)(ii), with reference to: 152.097.4

Maximum Sentence: 3 years and/or \$20,000

Offense Level: Felony

Offense Date (on or about): 03/08/2016

Control #(ICR#): 16006663

Charge Description: Jaren Lee Allen

On or about March 8, 2016, in the County of Blue Earth, said Defendant, Jaren Lee Allen did knowingly manufacture, sell, transfer, or deliver, or attempt to sell, transfer, or deliver a non-controlled substance under circumstances which would lead a reasonable person to believe that the substance was a controlled substance and the delivery or attempted delivery included an exchange of or demand for money or other valuable property as consideration for delivery of the noncontrolled substance, and the amount of the consideration was substantially in excess of the reasonable value of the noncontrolled substance.

COUNT IV

Charge: Drugs - Simulated - Appearance of Noncontrolled Substance Identical to Controlled Substance

Minnesota Statute: 152.097.1(3)(iii), with reference to: 152.097.4

Maximum Sentence: 3 years and/or \$20,000

Offense Level: Felony

Offense Date (on or about): 03/08/2016

Control #(ICR#): 16006663

Charge Description: Jaren Lee Allen

On or about March 8, 2016, in the County of Blue Earth, said Defendant, Jaren Lee Allen knowingly manufacture, sell, transfer or deliver, or attempt to sell, transfer, or deliver a non-controlled substance under circumstances which would lead a reasonable person to believe that the substance was a controlled substance and the physical appearance of the noncontrolled substance is substantially identical to specified controlled substance.

STATEMENT OF PROBABLE CAUSE

Agent Sam McGinnis, a licensed peace officer in the State of Minnesota currently assigned to the Minnesota River Valley Drug Task Force, reports that on March 8, 2016, he met with a confidential reliable informant (CRI) who, under his direction and control, contacted Jaren Lee Allen to purchase 1.5 grams of cocaine for \$150.00.

The CRI made contact with Allen via phone messaging and confirmed the purchase would take place. McGinnis reports he met the CRI at a predetermined location, at which time the CRI's person and vehicle, to include the trunk, were searched for illegal contraband and US currency, of which none was located. The CRI's person was then fitted with an electronic monitoring recording device. The CRI was also provided with \$150.00 of pre-recorded buy fund money for the purchase of 1.5 grams of cocaine.

The CRI then contacted Allen, and it was determined that the controlled purchase would take place at Smokes 4 Less on Stadium Road in the City of Mankato. McGinnis notes that he and Commander Wersal were able to follow the CRI the entire way without losing visual of the CRI. Once at the sale location, Agent Ruch was also able to make a constant visual of the CRI. The CRI then sent a text to Allen, letting him know that they were at the meeting location.

At approximately 8:43 p.m., a male dressed in a black hooded sweatshirt with the hood up started walking across the parking lot from the east and approaching the passenger's side of the CRI's car. The CRI noted on the wire that he's here. Allen then told the CRI that, "It's over. It's going to be a little bit over. I just don't feel comfortable here. That cool. Talk to you later." A moment later, the male left; and the CRI said on the wire, "We're done."

Agent McGinnis and Commander Wersal then followed the CRI back to a predetermined meeting location and took possession of a white-colored powdery substance wrapped in a small piece of plastic. McGinnis notes that, based on his training and experience, such packaging is routinely used during the transfer/sale of illegal controlled substances.

Agents then field tested the purported cocaine which was purchased for \$150.00 and did not receive a positive indication for cocaine. Agents tested it a second time and, once again, received a negative result for cocaine. Agents, at that time, determined they had been sold a fake controlled substance.

McGinnis notes he conducted a debrief with the CRI, who told McGinnis that they had arranged to buy 1.5 grams of cocaine for \$150.00 from Jaren Allen at the direction and control of Agent McGinnis. The CRI indicated they met Allen at the Smokes 4 Less on campus. Additionally, the CRI indicated they were positive that it was Jaren Allen they had met and purchased the purported cocaine from. The CRI also indicated they did not have any controlled substances or money on them and had been searched prior to the transaction.

More specifically, the CRI indicated that Allen had provided them with a small baggie with a white powder in it. The CRI also indicated they had similar dealings with Allen on past occasions.

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

Deborah McDermott
Patrol Commander
710 S Front St
Mankato, MN 56001-3803
Badge: 3143

Electronically Signed:
04/18/2016 11:15 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:
04/18/2016 09:50 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 **May 19, 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: April 18, 2016.

Judicial Officer

Krista J Jass
Judge of District Court

Electronically Signed: 04/18/2016 04:32 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.

JAREN LEE ALLEN

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: