

State of Minnesota  
County of Blue Earth

District Court  
5th Judicial District

Prosecutor File No.  
Court File No.

BEC-16-0603  
07-CR-16-167

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**State of Minnesota,**

Plaintiff,

vs.

**JAMIE ARTHUR LEYHE DOB: 05/15/1968**

724 11th St.  
Howard Lake, MN 55349

Defendant.

**COMPLAINT**

Summons

Tab Charge/Citation Previously Filed

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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-By Swindle**

Minnesota Statute: 609.52.2(a)(4)

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

Offense Level: Gross Misdemeanor

Offense Date (on or about): 11/12/2015 to 12/17/2015

Control #(ICR#): 15017017

Charge Description: Jamie Arthur Leyhe

On or between November 22, 2015 and December 27, 2015, in the County of Blue Earth, said Defendant, Jamie Arthur Leyhe did by swindling, whether by artifice, trick, device, or any other means, obtained property or services from another person and the value of the property or services stolen is more than \$500.00 but less than \$1,000.00.

## STATEMENT OF PROBABLE CAUSE

On December 22, 2015, Deputy Luanne Anderson, of the Blue Earth County Sheriff's Office, met with Victim 1 in the lobby of the Blue Earth Justice Center. Victim 1 stated that someone, a person later identified as Defendant Jamie Arthur Leyhe, paid a Mediacom bill through an EFT (Electronic Funds Transfer) from Victim 1's Pioneer Bank business account without the permission of Victim 1. Victim 1's bank, Pioneer Bank, is located in Blue Earth County, State of Minnesota. According to Victim 1's bank statements, the Defendant withdrew funds from Victim 1's bank account on November 12, 2015, for \$399.20; December 17, 2015, for \$225.12; and December 17, 2015, for \$342.55. Subsequently, a \$55.00 overdraft fee was charged to Victim 1's bank account due to the three electronic funds transfers. Victim 1 became aware of the theft situation when the overdraft fees were compounding.

Victim 1 later stated to Deputy Anderson that upon 'googling' the Defendant's name, Victim 1 recognized the Defendant's name to be a person Victim 1 hired to perform construction on a home Victim 1 was 'flipping' in St. Peter, Minnesota. Victim 1 stated at the time of the home improvement conducted by the Defendant, Victim 1 paid the Defendant via check. The Defendant therefore had access to the Victim 1's bank account and routing number.

According to Pioneer Bank, the three aforementioned transactions by the Defendant through EFT, were not merely attempts. Funds were withdrawn on all three transactions from the Victim's account. Pioneer Bank later refunded Victim 1's account in full, including the overdraft fee. The funds withdrawn by the Defendant from Victim 1's bank account totaled \$966.87, without the overdraft fee of \$55.00.

## 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:  
05/05/2016 01:17 PM  
Blue Earth County, MN

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

**Prosecuting Attorney**

Nicholas Boulieris  
Assistant County Attorney  
401 Carver Road  
PO Box 3129  
Mankato, MN 56002  
(507) 304-4600

Electronically Signed:  
05/05/2016 12:50 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: May 5, 2016.

**Judicial Officer**

Richard C. Perkins  
Judge of District Court

Electronically Signed: 05/05/2016 02:12 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.

**JAMIE ARTHUR LEYHE**

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: