

State of Minnesota  
County of Blue Earth

District Court  
5th Judicial District

Prosecutor File No.  
Court File No.

MAN-16-0164  
07-CR-16-1115

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**State of Minnesota,**

Plaintiff,

vs.

**SHAREE TASHA NOLAN DOB: 10/02/1985**

321 N. Broad Street  
Mankato, MN 56001

Defendant.

**COMPLAINT**

Summons

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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: Traffic-DL-Driving after cancellation-inimical to public safety**

Minnesota Statute: 171.24.5

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

Offense Level: Gross Misdemeanor

Offense Date (on or about): 02/18/2016

Control #(ICR#): 16004599

Charge Description: Said Defendant, Sharee Tasha Nolan, Also Known As Sharee Tasha Noland And Sharee Nolan, did after being given notice, or reasonably should have known of the cancellation, disobeyed the order by operating in this state any motor vehicle, the operation of which requires a valid driver's license, while her/his license or privilege was canceled; and the Commissioner of the Department of Public Safety has determined that the operation of a motor vehicle on the highways by the person would be inimical to the public safety or welfare.

## 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 Matthew Vitale and others identified herein.

On February 18, 2016 at approximately 12:47 p.m., Officer Vitale was in a fully marked MDPS squad vehicle, driving eastbound on Madison Avenue approached the intersection of Victory Drive and Madison Ave, in the City of Mankato, County of Blue Earth, State of Minnesota. While in the left lane of traffic, Officer Vitale observed a greenish 2004 Chrysler Pacifica bearing a whiskey Minnesota plates, pass him in the right lane. Officer Vitale was aware that the registered owner of the vehicle, bearing the aforementioned license plate, was Sharee Tasha Nolan, the defendant herein. Officer Vitale was aware that the defendant's driving status was canceled inimical to public safety (IPS); however, as of more recently, Officer Vitale was aware that the defendant's driving status was limited. After running the license plate number, Officer Vitale concluded that the defendant's license was again cancelled IPS. Both Officer Vitale and the defendant proceeded eastbound through the aforementioned intersection. The defendant took an immediate right onto Holly Lane.

Officer Vitale ran the plates in state and records indicated the defendant was again cancelled IPS. Officer Vitale turned right before Indigo Organic and drove south through an alleyway/parking lot towards Belle Avenue. Upon approach of Belle Avenue, Officer Vitale turned right (westbound) onto Belle Avenue. He observed the defendant drive eastbound on Belle Avenue towards him. Officer Vitale observed the driver of the Pacifica and visually identified her as Sharee Nolan, the defendant, who he is familiar with from previous contacts. Officer Vitale turned his vehicle around and caught up to the vehicle as it was turning into the Kwik Trip parking lot. He activated his emergency lights and initiated a traffic stop.

The defendant pulled into a parking space in front of the store. Officer Vitale approached the vehicle and asked the defendant if her license was valid. The defendant stated she had a valid license. The defendant stated her license was good because she had her ignition interlock, which she began blowing into. Officer Vitale informed the defendant that her license was cancelled IPS again. The defendant became upset and told the officer she was never notified of this change in her license status. Officer Vitale informed the defendant that he would not be taking her to jail for this suspected violation but would complete a report and a letter of transmittal for review for charges. He drove the defendant home. The defendant's vehicle was locked and left in the Kwik Trip parking lot. The defendant stated she would arrange for a friend to drive the vehicle back to her house.

Defendant also received a Stay of Adjudication for a 2015 Driving After Cancellation-Inimical to Public Safety charge (Please see 07-CR-15-2047).

## 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**

Craig Frericks  
Commander  
710 S Front St  
Mankato, MN 56001-3803  
Badge: 3102

Electronically Signed:  
03/24/2016 12:52 PM  
Blue Earth County, Minnesota

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 56002-3129  
(507) 304-4600

Electronically Signed:  
03/24/2016 11:48 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 \_\_\_\_\_, \_\_\_\_\_ 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 24, 2016.

**Judicial Officer** Greg Anderson  
District Court Judge

Electronically Signed: 03/24/2016 01:11 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.

**SHAREE TASHA NOLAN**

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: