

State of Minnesota  
County of Blue Earth

District Court  
5th Judicial District

Prosecutor File No.  
Court File No.

BEC-20-0888  
07-CR-20-3354

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**State of Minnesota,**

Plaintiff,

vs.

**JACK ALAN ROBB DOB: 08/15/1994**

411 James Ave.  
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: Pharmacy - Possess/Control/Manufacture/Sell/Furnish/Dispense/Dispose of Hypodermic Syringes/Needles**

Minnesota Statute: 151.40.1, with reference to: 151.29

Maximum Sentence: 90 days and/or \$1,000

Offense Level: Misdemeanor

Offense Date (on or about): 07/11/2020

Control #(ICR#): 20015996

Charge Description: Jack Alan Robb

On or about July 11, 2020, in the County of Blue Earth said Defendant, Jack Alan Robb did, unlawfully possess, control, manufacture, sell, furnish, dispense, or otherwise dispose of hypodermic syringes or needles or any instrument or implement which can be adapted for subcutaneous injections.

## STATEMENT OF PROBABLE CAUSE

On July 11, 2020, at approximately 1:22 a.m., Officer Honetschlager of the Mankato Department of Public Safety was on patrol in the City of Mankato when he was dispatched to respond to a driving complaint. Dispatch indicated there was a 911 caller behind a vehicle which was driving erratically. The caller stated the car was stopping in the roadway and swerving. Dispatch was also informed the driver was hitting his head on the steering wheel. Officer Honetschlager responded to the area in which the vehicle was reportedly being followed.

Officer Honetschlager located the suspect vehicle in the area of Lafayette Street and Broad Street. Officer Honetschlager observed the vehicle swerve from side to side and stop erratically in the middle of the roadway. Officer Honetschlager followed the car as it continued eastbound on Lafayette Street into the 600-block, which ends in a cul-de-sac. As the car reached the end of the roadway, Officer Honetschlager activated his squad's emergency lights and conducted a traffic stop.

Officer Honetschlager approached the vehicle and identified the driver as Jack Alan Robb, DOB 8-15-1994. Robb appeared to be extremely jittery and was moving from side to side in his seat, rapidly looking around all the car. Officer Honetschlager approached Robb and noticed he was sweating heavily despite his vehicle's air conditioner running. Robb was unable to answer basic questions, such as where he lived, where he was coming from, and what he had been doing that evening. Robb appeared not to comprehend these basic questions. Robb appeared to be sincerely attempting to answer Officer Honetschlager's questions but seemed unable to come up with an understandable answer. Robb appeared incapable of focusing on Officer Honetschlager or his questions. Robb fumbled for documents and lost track of his wallet despite it being in the vehicle. Officer Honetschlager did not detect any odor of alcohol or obvious signs of alcohol intoxication. Robb displayed signs that Officer Honetschlager knew through training and experience to be consistent with narcotics intoxication.

Officer Honetschlager had Robb exit the car and conduct field sobriety tests. During the field sobriety testing, Officer Honetschlager observed the following. On the HGN test, Officer Honetschlager saw a lack of smooth pursuit in both eyes, Robb's eyes were moving rapidly, and he was unable to detect HGN. Robb appeared to be unable to focus on or follow Officer Honetschlager's finger despite saying he understood the directions and that he could see Officer Honetschlager's finger. During the walk and turn test, Robb failed to stay in position for instructions, took an incorrect number of steps, made an incorrect turn, and did not return down the line. On the one-legged stand test, Officer Honetschlager observed Robb failed to stay in place for instructions, he lifted his left leg and almost immediately put it down, he then lifted the other foot and put it down, and then just stood there looking around.

Based on Officer Honetschlager's observations during field sobriety testing, he administered a preliminary breath test on Robb and received a result indicating 0.000 alcohol content. Officer Honetschlager noted this confirmed his suspicions that Robb was under the influence of something other than alcohol. Robb was placed under arrest for driving while impaired.

Officer Honetschlager located a box containing 89 new 3-cc syringes with needles attached, one box containing 80 needles, and five loose syringes with needles attached.

Officer Honetschlager sought and obtained a warrant to complete a blood draw on Robb. The warrant was signed and executed at 3:24 a.m. The blood draw kit has been submitted to the Bureau of Criminal Apprehension for additional testing and analysis. The blood test results did not detect anything.

## 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**

Daniel Schisel  
Police Commander  
710 S Front St  
Mankato, MN 56001-3803  
Badge: 3135

Electronically Signed:  
10/13/2020 03:43 PM  
Blue Earth County, Minnesota

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

**Prosecuting Attorney**

Ashley Jean Liestman  
Assistant County Attorney  
401 Carver Road  
PO Box 3129  
Mankato, MN 56002  
(507) 304-4600

Electronically Signed:  
10/13/2020 01:56 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: October 13, 2020.

**Judicial Officer** Krista J Jass  
Judge of District Court

Electronically Signed: 10/13/2020 04:24 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.

**JACK ALAN ROBB**

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: