

State of Minnesota  
County of Blue Earth

District Court  
5th Judicial District

Prosecutor File No.  
Court File No.

MAN-16-0561  
07-CR-16-2852

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**State of Minnesota,**

Plaintiff,

vs.

**MARIA CARMEN MENDOZA DOB: 02/28/1975**

120 Homestead Road #6  
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: Theft-Take/Use/Transfer Movable Prop-No Consent**

Minnesota Statute: 609.52.2(a)(1), with reference to: 609.52.3(4)

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

Offense Level: Gross Misdemeanor

Offense Date (on or about): 06/30/2016

Control #(ICR#): 16019295

Charge Description: Said Defendant, Maria Carmen Mendoza, did intentionally and without claim of right take, use, transfer, conceal or retain possession of movable property of another without the other's consent and with intent to deprive the owner permanently of possession of the property, such property being worth more than \$500 but less than \$1001.

## 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 Rick Wanderscheid and others identified herein.

On June 30, 2016, at approximately 10:00 p.m., Assets Protection Team Leader, Witness 1 of Target, located in the City of Mankato, County of Blue Earth, State of Minnesota, observed a female, later identified as Maria Carmen Mendoza, the Defendant herein, select various cosmetic items and place them in her Target shopping cart. At approximately 10:25, Witness1 observed the Defendant conceal various cosmetic items in a bag that she had not purchased in aisles G2 and G3. At approximately 10:40 p.m., the Defendant was seen leaving aisles G2 and G3 and walked to the front of the store. At approximately 10:43 p.m., the Defendant was seen in the self-checkout aisle where the Defendant purchased a few items in her cart, but not all of the items. During continued surveillance Witness1 noted the Defendant, when scanning the items, would take two to three items at a time, scan only one item, and place the non-scanned items back into the bag. After scanning a few items, Witness 1 observed the Defendant conceal fragrances and did not scan those items to purchase either. The Defendant was seen walking towards the front of the store, past all points of sale, without paying for non-scanned items and exited the store at approximately 10:59 p.m. Non-scanned and scanned items were located in the same bag upon exiting the store.

Witness1 stopped the Defendant and identified himself as Target security and asked the Defendant if she would walk to an office with Witness 1 to discuss the unpaid merchandise, and the Defendant agreed. The Defendant entered the Assets Protection Office where Witness 1 and Executive Team Leader, Witness 2, acted as a witness to the conversation. Witness 1 asked the Defendant if she knew of the unpaid items in her bag, to which the Defendant admitted she knowingly took the unpaid items past the point of sale. While in the office, Witness 1 observed the Target shopping cart the Defendant was seen pushing out of the store, and noted the presence of unpaid items. Witness 1 also looked at items in the bag to cross-reference what was purchased and not purchased, in order to obtain a total requisite dollar amount stolen. The unpaid and paid items were separated and Senior Team Leader, Witness 3, added unpaid merchandise to obtain a dollar amount. The amount stolen totaled: \$570.06.

Mankato Police were subsequently called at approximately 11:29 p.m. Officer Wanderscheid, of Mankato Police, responded to the Target location at the River Hills Mall and was briefed by Witness 1. Officer Wanderscheid was given a declaration of arrest report from Witness 1 regarding the Defendant. Officer Wanderscheid subsequently transported the Defendant to the Blue Earth County Justice Center where the Defendant was printed, photographed, and subsequently released. A letter of transmittal was completed and sent to the Blue Earth County Attorney's Office for Gross Misdemeanor Theft charges.

## 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  
Detective Commander  
710 S Front St  
Mankato, MN 56001-3803  
Badge: 3143

Electronically Signed:  
07/15/2016 12:16 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 56002-3129  
(507) 304-4600

Electronically Signed:  
07/14/2016 12:53 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 **August 11, 2016 at 8:15 AM** 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: July 15, 2016.

**Judicial Officer**

Krista J Jass  
Judge of District Court

Electronically Signed: 07/15/2016 01:07 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.

**MARIA CARMEN MENDOZA**

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: