

State of Minnesota
County of Blue Earth

District Court
5th Judicial District

Prosecutor File No.
Court File No.

MAN-16-0090
07-CR-16-529

State of Minnesota,
Plaintiff,

COMPLAINT
Warrant

vs.

DANIELLE ISABEL VASQUEZ DOB: 11/18/1981

unknown

Defendant.

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): 01/21/2016

Control #(ICR#): 16001966

Charge Description: Said Defendant, Danielle Isabel Vasquez, 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 Timothy Spellacy and others identified herein.

On January 21, 2016, at approximately 3:00 p.m., Officer Spellacy responded to a report of a theft from the Herberger's store in the City of Mankato, Blue Earth County, Minnesota. Officer Spellacy identified a witness as W1. W1 reported that two female individuals had stolen a number of items from the store without paying for them. The two females were later identified as Paula Marie Clay and Danielle Isabel Vasquez, the Defendant herein.

Clay and the Defendant fled the store and entered a vehicle bearing Minnesota license plate 715 RLD. A computer check of the vehicle's license plates lists to Clay. W1 reported that the individuals fled at a high rate of speed from the parking lot of the store. Officer Spellacy contacted Clay regarding the theft of the merchandise. Clay denied having anything to do with the theft. Clay said that she always drives at a high rate of speed, which is why they left the parking lot in that manner. Clay said that the Defendant kept all of the merchandise. Clay indicated that she did not know where the Defendant was living and did not have a good telephone number for her.

On January 22, 2016, at approximately 1:30 p.m., Clay came to the Public Safety Center with some of the stolen property. Clay said that the Defendant had been located at Jackpot Junction Casino. Clay told Officer Spellacy that she tried to get the Defendant to come with her. Clay returned four rollerball bottles of perfume and four cards of earrings. One rollerball of perfume costs \$35.00 each. It was alleged that the Defendant took eight rollerballs of perfume. When Clay returned some of the merchandise to the Public Safety Center, she returned four rollerballs of perfume. In addition to perfume and earrings, the Defendant took miscellaneous children's clothing as well.

A computer check of the defendant's prior criminal history indicates that she has two prior convictions for Receiving Stolen Property and Theft. The defendant has bench warrant for her arrest for a pending theft offense in Blue Earth County. See Blue Earth County District Court file 07-CR-15-5130.

The total of merchandise taken was valued at \$557.00. Restitution is requested.

A warrant is requested in this matter as the defendant's address is unknown.

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:
02/10/2016 09:51 AM
Blue Earth County, mn

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

Prosecuting Attorney

Linda B. Hilligoss
Assistant Mankato City Attorney
10 Civic Center Plaza
PO Box 3368
Mankato, MN 56002-3368
(507) 387-8559

Electronically Signed:
02/10/2016 08:43 AM

