

State of Minnesota
County of Blue Earth

District Court
5th Judicial District

Prosecutor File No.
Court File No.

BEC-16-0016
07-CR-16-278

State of Minnesota,
Plaintiff,

COMPLAINT
Summons

vs.

CONSTANCE ANN KEIM DOB: 05/14/1957

1725 Bassett Drive
Mankato, MN 56001-6202

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: 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): 12/31/2015

Control #(ICR#): 15041332

Charge Description: Constance Ann Keim

On or about December 31, 2015, in the County of Blue Earth, said Defendant, Constance Ann Keim 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 driver's license, while her/his license or privilege was cancelled; 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.

COUNT II

Charge: Motor Vehicle Registration - Intent to Escape Tax

Minnesota Statute: 168.35

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

Offense Level: Gross Misdemeanor

Offense Date (on or about): 12/31/2015

Control #(ICR#): 15041332

Charge Description: Constance Ann Keim

On or about December 31, 2015, in the County of Blue Earth, said Defendant, Constance Ann Keim did with intent to escape payment of any tax on a motor vehicle, delayed or neglected to properly list and apply to register the same, or with intent to prevent the payment or collection of the proper tax, fee, or lien thereon, violated or neglected to comply with any of the provisions of MN Statute Section 168.

COUNT III

Charge: Traffic Regulation-Uninsured Vehicle-Owner Violation

Minnesota Statute: 169.797.2

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

Offense Level: Misdemeanor

Offense Date (on or about): 12/31/2015

Control #(ICR#): 15041332

Charge Description: Constance Ann Keim

On or about December 31, 2015, in the County of Blue Earth, said Defendant, Constance Ann Keim did, as an owner of a vehicle with respect to which security is required under sections 65B.41 to 65B.71, operated the vehicle or permitted it to be operated upon a public highway, street, or road in this state and knows or has reason to know that the vehicle does not have security complying with the terms of section 65B.48 operate a vehicle without insurance fail to produce, upon demand of a peace officer, proof of insurance in force at the time of the demand covering the vehicle being operated..

COUNT IV

Charge: Motor Vehicle Registration - Unregistered-Certificate Revoked

Minnesota Statute: 168.36.1

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

Offense Level: Misdemeanor

Offense Date (on or about): 12/31/2015

Control #(ICR#): 15041332

Charge Description: Constance Ann Keim

On or about December 31, 2015, in the County of Blue Earth, said Defendant, Constance Ann Keim did use or cause any motor vehicle to be used or operated while a certificate of registration of the motor vehicle issued to the person is suspended or revoked.

STATEMENT OF PROBABLE CAUSE

On December 31, 2015 at approximately 9:34 p.m., Officer Myers of the Mankato Department of Public Safety was on patrol in the City of Mankato, traveling on South Riverfront Drive. As Officer Myers approached the area of Stoltzman road, she observed a vehicle traveling northbound on Riverfront Drive. She was aware that the vehicle's registration was expired, the plates were impounded for alcohol, and that the registered owner was canceled as inimical to public safety. Officer Myers turned around and the vehicle turned right onto Marshall Street and then left onto South Front Street. Officer Myers ran the license plate on the vehicle and verified its status. She then initiated a traffic stop.

Officer Myers approached the driver's door of the vehicle and made contact with the driver, Constance Ann Keim, DOB 5-14-1957, the registered owner of the vehicle. When asked, Keim said she did not have a valid driver's license. She instead provided Officer Myers with a Minnesota Identification Card. Officer Myers then asked her if she had insurance on the vehicle and she said that she did not. Officer Myers notified her that the registration for the vehicle had expired in February of 2014 and that her license plates were impounded for alcohol. Officer Myers also requested a tow for the vehicle.

Keim was placed under arrest and walked to Officer Myers squad car without incident. Keim was then transported to the Blue Earth County Jail and provided with a license plate revocation notice. When Officer Myers advised Keim of the charges, Keim made a statement that she did not have the money to pay for the items required of her to drive her vehicle. A review of her driving record indicates that her driving privileges are canceled as inimical to public safety.

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:
01/22/2016 02:37 PM
Blue Earth County, Minnesota

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

Prosecuting Attorney

Ryan S. Hansch
401 Carver Road
PO Box 3129
Mankato, MN 56002
(507) 304-4600

Electronically Signed:
01/22/2016 01:20 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: January 22, 2016.

Judicial Officer

Krista J Jass
Judge of District Court

Electronically Signed: 01/22/2016 04:52 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.

CONSTANCE ANN KEIM

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: