

State of Minnesota
County of Blue Earth

District Court
5th Judicial District

Prosecutor File No. 0070105552
Court File No. 07-CR-24-1008

State of Minnesota,

Plaintiff,

vs.

DANIELLE JANIS STEVENSON DOB: 02/23/1993

86 Balsam Circle
Madison Lake, MN 56063

Defendant.

COMPLAINT

Summons

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(2)

Maximum Sentence: 10 years or \$20,000, or both (over \$5,000)

Offense Level: Felony

Offense Date (on or about): 05/01/2022 to 03/01/2023

Control #(ICR#): 23004016

Charge Description: Between May 1, 2022 and March 1, 2023, in the County of Blue Earth, Minnesota, Danielle Janis Stevenson, did, intentionally and without claim of right take, use, transfer, conceal or retain possession of the movable property of another without the other's consent and with intent to deprive the owner permanently of possession of the property and the value of the property or services stolen exceeded \$5,000.00.

COUNT II

Charge: Theft-By Swindle

Minnesota Statute: 609.52.2(a)(4), with reference to: 609.52.3(2)

Maximum Sentence: 10 years or \$20,000 fine

Offense Level: Felony

Offense Date (on or about): 05/01/2022 to 03/01/2023

Control #(ICR#): 23004016

Charge Description: Between May 1, 2022 and March 1, 2023, in the County of Blue Earth, Minnesota, Danielle Janis Stevenson, did by swindling, whether by artifice, trick, device, or any other means, obtained property or services from another person and the value of the property or services stolen exceeds \$5,000.00

STATEMENT OF PROBABLE CAUSE

On March 16, 2023, Victim 1 reported that his Business was missing a substantial amount of money. An audit revealed \$15,070.90 was missing.

Investigation revealed that \$14,795.93 was missing from actual cash payments made by customers for money owed to the business. \$274.16 was missing from petty cash. Danielle Janis Stevenson (DOB 02/23/1993) worked for the business from May 16, 2022 through February 8, 2023. Stevenson's job was tending to accounts payable/human resources. When cash payments were made by customers, the money was counted by two employees verifying the transaction. Victim 1 would be the final person to handle the cash before it being deposited in the bank. Victim 1 noticed that Stevenson was entering the payments into QuickBooks, but the money was not being posted to the bank account.

On November 2, 2022, Stevenson created a fictitious deposit slip of cash payments totaling \$11,157.10 – the exact amount believed to be unaccounted for around that time. Fictitious entries were made into the Victim 1's business accounts which showed the \$11,157.10 moving from one business account to another. Neither bank had any record of the amount of money being deposited or transferred between the banks. Stevenson used 21 cash transactions of customers. It was also clear that random digits were being entered as part of established accounts and checks.

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

Paul Barta
Captain
401 Carver Rd
Mankato, MN 56002-0228
Badge: 2721

Electronically Signed:
03/21/2024 09:29 AM
Blue Earth County, MN

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

Prosecuting Attorney

Todd Kosovich
401 Carver Road
PO Box 3129
Mankato, MN 56002
(507) 304-4600

Electronically Signed:
03/21/2024 08:26 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 as directed in the Notice of Hearing before the above-named court 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 21, 2024.

Judicial Officer

Krista J Jass
Judge of District Court

Electronically Signed: 03/21/2024 09:41 AM

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.

Danielle Janis Stevenson

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: