

State of Minnesota
County of Blue Earth

District Court
5th Judicial District

Prosecutor File No. 0070111962
Court File No. 07-CR-26-1444

State of Minnesota,
Plaintiff,

COMPLAINT
Summons

vs.

SAMUEL ROBERT SUMMERS DOB: 06/28/1979

115 Echo Street #105
Mankato, MN 56001

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-By Swindle

Minnesota Statute: 609.52.2(a)(4)

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

Offense Level: Felony

Offense Date (on or about): 01/01/2025 to 08/31/2025

Control #(ICR#): 25023081

Charge Description: On or between January 1, 2025 and August 31, 2025, in the County of Blue Earth, Minnesota, Samuel Robert Summers, did by swindling, whether by artifice, trick, device, or any other means, obtain property or services from another person and the value of the property or services stolen exceeds \$5,000.00.

STATEMENT OF PROBABLE CAUSE

In the morning on August 14, 2025, Officer Ellis from the Mankato Department of Public Safety spoke with Victim 1, who owns Business 1 in Blue Earth County. Victim 1 reported two employees, Kari Louise Albrecht (DOB: 06/17/1981) and Samuel Robert Summers (DOB: 06/28/1979) had been intentionally misreporting time worked on their timecards, receiving payment for work they did not complete.

Victim 1 said Summers was only approved to work on Tuesday, Thursday, and one hour on Monday. Instead, Summers had been reporting working everyday. While employees were expected to punch in on a timecard machine when they arrived, Summers failed to punch in for several months and wrote that he worked five days a week for 20-25 hours total.

Similarly, Albrecht was only assigned to work Monday, Wednesday, and Friday, but reported she worked every weekday, 20-25 hours per week total, and handwrote her timecards instead of time-stamping them as requested.

Both Albrecht and Summers also called in sick and requested days off, asking other employees to cover their shifts for them, but they still reported on their timecards that they worked. Victim 1 said Victim 1 had text messages that showed Albrecht and Summers requested time off but still reported working on those days.

For example, Victim 1 said, Summers reported working several hours the previous week but did not work at all. After further investigation, Victim 1 learned that Albrecht and Summers had been falsifying their timecards for almost a year.

Witness 1 is employed by Business 1 and provided calendars to law enforcement showing Summers' (1) normal scheduled workdays; (2) scheduled days Summers asked to take off; and (3) days Summers claimed he work but did not. The calendars showed a total of 335.50 hours Summers claimed he worked but did not, totaling \$6,039.00.

Witness 1 provided a similar calendar for Albrecht that showed a total of 236 hours Albrecht claimed she worked but did not, totaling \$4,248.00.

Victim 1 fired Albrecht and Summers after discovering what they had been doing. According to Victim 1, Albrecht and Summers admitted intentionally misreporting their hours worked, admitting it was "not fair" for them to do that.

Officer McClinton called Albrecht and Summers. Summers said he would go to speak with McClinton but did not. Albrecht did not return McClinton's call.

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

Adam Gray
Operations Commander
710 S Front St
Mankato, MN 56001-3803
Badge: 3117

Electronically Signed:
04/09/2026 09:52 AM
Blue Earth County, Minnesota

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

Prosecuting Attorney

Christopher K Lowe
Assistant County Attorney
401 Carver Road
PO Box 3129
Mankato, MN 56002
(507) 304-4600

Electronically Signed:
04/08/2026 03:31 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 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: April 9, 2026.

Judicial Officer

Kristine Weeks
District Court Judge

Electronically Signed: 04/09/2026 10:20 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.

Samuel Robert Summers

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: