State of Minnesota
County of Blue Earth

District Court
5th Judicial District

Prosecutor File No. 0070112413
Court File No. 07-CR-26-4614

State of Minnesota,

Plaintiff,

vs.

MANUELA FRANCESCA OTTO DOB: 07/15/1988

332 S Crystal Street
PO Box 304
Lake Crystal, MN 56055

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: Aid and Abet Theft-Take/Use/Transfer Movable Prop-No Consent
Minnesota Statute: 609.52.2(a)(1), with reference to: 609.05.1, 609.52.3(5)
Maximum Sentence: 90 days or $1,000 fine, or both.
Offense Level: Misdemeanor

Offense Date (on or about): 10/23/2025

Control #(ICR#): 25001991

Charge Description: On or about October 23, 2025, in the County of Blue Earth, Minnesota, Manuela Francesca Otto did intentionally aid, advise, hire, counsel, or conspire with, or otherwise procure another to commit the crime, and/or did personally commit said crime; to wit: 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.

COUNT II

Charge: Aid and Abet Theft-Take/Use/Transfer Movable Prop-No Consent
Minnesota Statute: 609.52.2(a)(1), with reference to: 609.05.1, 609.52.3(5)
Maximum Sentence: 90 days or $1,000 fine, or both.
Offense Level: Misdemeanor

Offense Date (on or about): 11/11/2025

Control #(ICR#): 25001991

Charge Description: On or about November 11, 2025, in the County of Blue Earth, Minnesota, Manuela Francesca Otto did intentionally aid, advise, hire, counsel, or conspire with, or otherwise procure another to commit the crime, and/or did personally commit said crime; to wit: 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.

STATEMENT OF PROBABLE CAUSE

On October 23, 2025, Chief Honsey from the Mapleton Police Department responded to Business 1 in the City of Mapleton, Blue Earth County, following a theft report. Chief Honsey subsequently spoke with Witness 1, Witness 2, and Witness 3.

Witnesses 1 and 2 work at Business 1. Witness 3 was a customer there at the time of the alleged theft. Witness 3 said a female suspect had a white laundry basket on a cart and was filling it up with merchandise. When Witness 3 went to pay for her items, the female suspect walked right out the door with the merchandise and got into an SUV.

Witness 2 said the female suspect stole a “hamper-full” of merchandise. Witness 2 said a male suspect with the female suspect stole a Bluetooth speaker. They arrived together and left the property together.

The value of the merchandise reported stolen by the suspects was $215.55.

On November 4, 2025, Witness 1 provided to Chief Honsey surveillance video from Business 1 showing the male and female suspects. Honsey posted screen shots from the video on Facebook and asked for the public’s help with identifying the male and female suspects. Honsey reported that an anonymous tip identified the suspects as Jordy Earl Schultz (DOB: 09/17/1982) and Manuela Francesca Otto (DOB: 07/15/1988).

On November 11, 2025, Sergeant Bottelson from the Madelia Police Department was dispatched to Business 2 in the City of Madelia, following a theft complaint. Business 1 and Business 2 are part of the same franchise. Bottelson responded and met with Witness 4 and Witness 5 who reported a male and female had been in Business 2 for almost an hour before the male paid for some items, and when he left, held the door for the female who wheeled out a cart full of items without paying for them.

When Witness 4 left Business 2 to pursue the female, the male pointed to the other side of Business 2 and said, “she went that way,” before getting in a vehicle and leaving. Witness 5 noted the vehicle had the license plate number KDD704 and described the vehicle as a black Dodge “hatchback” style vehicle. The vehicle is registered to Schultz. Witness 4 provided a list of stolen items totaling $243.80.

Witness 4 provided Bottelson with security footage of the male and female entering Business 2.

Bottelson posted a screenshot from this footage on the Madelia Police Department’s Facebook page. Several people called in response and identified the male and female as Schultz and Otto.

Chief Honsey created two photo lineups of six photos each, one including Schultz and the other including Otto. Looking at the photo lineup of females, Witness 3 identified Otto as the female suspect from Business 1.

Chief Honsey sent the photo lineup to Bottelson. Bottelson showed the photo lineups to Witness 4 and Witness 5 who separately identified Schultz and Otto as the individuals who stole items from Business 2.

On November 28, 2025, Bottelson sent Gangelhoff surveillance footage from Business 2 and related screen shots. Gangelhoff was able to identify Schultz and Otto as the male and female suspects, based on Gangelhoff’s prior contacts with each.

On December 2, 2025, Chief Honsey contacted Gangelhoff and asked Gangelhoff to review surveillance

footage and screenshots relating to the October 23, 2025, theft at Business 1.

After reviewing the surveillance footage and screen shots, Gangelhoff identified the male and female suspect as Schultz and Otto, based on his prior contacts with both Schultz and Otto, including contact that same day. Gangelhoff knew Schultz and Otto to be in a significant romantic relationship.

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

Benjamin M Honsey
Chief of Police
104 2nd Ave NE
PO Box 342
Mapleton, MN 56065
Badge: 4871

Electronically Signed:
11/02/2026 01:22 PM
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:
11/02/2026 01:10 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).

[X] 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: November 2, 2026.

Judicial Officer Kristine Weeks
District Court Judge

Electronically Signed: 11/02/2026 01:44 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.

Manuela Francesca Otto

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: