STATE OF MINNESOTA
COUNTY OF DAKOTA

DISTRICT COURT
FIRST JUDICIAL DISTRICT

COURT FILE NO. _____
COUNTY ATTORNEY FILE NO. CA-2013-00264
CONTROLLING AGENCY: MN0190100
CONTROL NUMBER: 13-001026

State of Minnesota,

Plaintiff,

v.

ANDREA BEATRICE WRIGHT
2104 F 117TH ST
BURNSVILLE, MN 55337
(DOB: 6/9/66)

[ ] SUMMONS
[ ] WARRANT
[X] ORDER OF DETENTION
[ ] AMENDED

Defendant.

COMPLAINT

The Complainant, being duly sworn, makes complaint to the above-named Court and states that there is probable cause to believe that the Defendant committed the following offense(s):

COUNT 1: THEFT ($1,000 - $5,000)
Minnesota Statutes §609.52, Subd. 2(a)(1); 609.52, Subd. 3(3)(a); 609.101
PENALTY: 0-5 Years and/or $3,000.00 - $10,000.00
MOC: TT029 GOC: N
[X] Felony [ ] Gross Misdemeanor [ ] Misdemeanor [ ] Petty Misdemeanor

On or about February 7, 2013, in the County of Dakota, Minnesota, ANDREA BEATRICE WRIGHT 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, and the value of the property or services stolen is more than $1,000 but not more than $5,000.

STATEMENT OF PROBABLE CAUSE

Your Complainant is a licensed peace officer in the State of Minnesota. Acting in that capacity, I have reviewed the police reports and state that the following facts are true and establish probable cause.

On February 7, 2013, the Burnsville Police Department was called to a retail store in the City of Burnsville, Dakota County, Minnesota, on a report of an employee theft. When the officer arrived she spoke with a loss prevention employee who stated that employee, Andrea Beatrice Wright, date of birth 6/9/1966, has been stealing merchandise from the store since early January 2013. The store provided the officer with video surveillance showing Wright stealing merchandise on five different occasions between January 6, 2013 and January 29, 2013. The total value of all of the stolen merchandise is $1081.84. The store also provided the officer with video surveillance which shows Wright's husband returning some of the stolen merchandise for a cash refund. Wright is the employee issuing the refund.

The officer interviewed Wright at the Burnsville Police Department. Wright admitted to taking two of the items but indicated that they were under her cart and she forgot about them. Wright admitted to leaving the store with an HP laptop computer without paying for the computer but stated that the clerk did not ring up the computer and Wright was not aware that she did not pay for it. On that date Wright left the store paying only $78 for her purchases and the computer alone was priced at $428.00.

NOTICE: You must appear for every court hearing on this charge. A failure to appear for court on this charge is a criminal offense and may be punished as provided in Minn. Stat. §609.49.

Complaint requests that Defendant, Andrea Beatrice Wright, 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'S NAME: **COMPLAINANT'S SIGNATURE:**

Subscribed and sworn to before the undersigned this _____ day of _____, 2013.

NOTARY STAMP: **SIGNATURE:**

Notary Public

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

PROSECUTING ATTORNEY'S SIGNATURE:

Date:

(ajh)

Name: Heather Pipenhagen
Assistant Dakota County Attorney
Dakota County Judicial Center
1560 Highway 55
Hastings, MN 55033
(651) 438-4438
Attorney Registration No.: 0270076

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.

[ ] SUMMONS

THEREFORE YOU, THE ABOVE-NAMED DEFENDANT, ARE HEREBY SUMMONED to appear on _____, at _____ before the above-named court at the Dakota County Judicial Center 1560 Highway 55, Hastings, MN 55033 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 hereby order, in the name of the State of Minnesota, that the above-named Defendant be apprehended and arrested without delay and brought promptly before the above-named 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***

[X] ORDER OF DETENTION

Since the above-named Defendant is already in custody, I hereby order, subject to bail or conditions of release, that the above-named Defendant continue to be detained pending further proceedings.

Bail:
Conditions of Release:

This complaint, duly subscribed and sworn to, is issued by the undersigned Judicial Officer this __8th_ day of ____February_____, 2013.

JUDICIAL OFFICER:
NAME:
TITLE: Judge of District Court

SIGNATURE:

_____/s/_____
Judge

Sworn testimony has been given before the Judicial Officer by the following witnesses:

COUNTY OF DAKOTA
STATE OF MINNESOTA

STATE OF MINNESOTA

Plaintiff,

vs.

ANDREA BEATRICE WRIGHT

Defendant.

Clerk's Signature or File Stamp:

RETURN OF SERVICE
I hereby Certify and Return that I have served a copy of this COMPLAINT upon the Defendant herein named.

Signature of Authorized Service Agent:

_____