STATE OF MINNESOTA
COUNTY OF DAKOTA

DISTRICT COURT
FIRST JUDICIAL DISTRICT

COURT FILE NO. _____
COUNTY ATTORNEY FILE NO. CA-2013-01168
CONTROLLING AGENCY: MN0191000
CONTROL NUMBER: 13-003319

State of Minnesota,

Plaintiff,

v.

RYAN MICHAEL MARONEY
12790 GERMANE AVE
APT 302
APPLE VALLEY, MN 55124
(DOB: 2/20/84)

[ ] SUMMONS
[X] WARRANT
[ ] 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 (MOTOR VEHICLE USE WITHOUT CONSENT)
Minnesota Statutes §609.52, Subd. 2(a)(17); 609.52, Subd. 3(3)(d)(v); 609.101
PENALTY: 0-5 Years and/or $3,000.00 - $10,000.00
MOC: V0071 GOC: N
[X] Felony [ ] Gross Misdemeanor [ ] Misdemeanor [ ] Petty Misdemeanor

On or about June 2, 2013, in the County of Dakota, Minnesota, RYAN MICHAEL MARONEY, did take or drive a motor vehicle without the consent of the owner or an authorized agent of the owner, knowing or having reason to know that the owner or an authorized agent of the owner did not give consent.

COUNT 2: DRIVING AFTER REVOCATION
Minnesota Statutes §171.24, Subd. 2; 609.101
PENALTY: 0-90 Days and/or $300.00 - $1,000.00
MOC: J3901 GOC: N
[ ] Felony [ ] Gross Misdemeanor [X] Misdemeanor [ ] Petty Misdemeanor

On or about June 2, 2013, in the County of Dakota, Minnesota, RYAN MICHAEL MARONEY, did willfully disobey an order revoking the person's driver's license or driving privileges by operating a motor vehicle within this state while the person's driver's license or driving privileges were revoked.

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 June 2, 2013, Officer Nicholas Wolf of the Apple Valley Police Department responded to a residence located in the City of Apple Valley, Dakota County, Minnesota, on a report of a stolen motor vehicle. Upon reaching the residence, Officer Wolf spoke to D.P., the owner of the motor vehicle who reported the following. D.P. had been working on his 1992 Ford Taurus wagon in front of his residence on that date. D.P. went inside his residence for a brief period of time and when he returned outside, the vehicle was gone. D.P. had left the keys inside the vehicle.

D.P. reported that his neighbor M.C. may have witnessed the theft. Officer Wolf interviewed M.C. who reported the following. Ryan Michael Maroney, born February 20, 1984, is homeless and had been staying with friends. Defendant had been staying at M.C.'s residence recently. On June 2, 2013, M.C. kicked Defendant out of her residence. When Defendant left the residence, M.C. saw Defendant enter D.P.'s vehicle and drive off. A review of Defendant's driving record shows that his driving privileges were revoked.

The vehicle was subsequently located in Dunn County, Wisconsin on June 4, 2013. The vehicle was unoccupied and the whereabouts of Defendant are currently unknown.

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, Ryan Michael Maroney, 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:

(mcn)

Name: Kathryn M. Keena
Assistant Dakota County Attorney
Dakota County Judicial Center
1560 Highway 55
Hastings, MN 55033
(651) 438-4438
Attorney Registration No.: 020092X

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.

[X] 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* **[X]** ***Execute Nationwide*** [ ] *Execute in Border States*

[ ] 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 _10th_ day of ____July_____, 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	*Clerk's Signature or File Stamp:*
STATE OF MINNESOTA Plaintiff, vs. **RYAN MICHAEL MARONEY** Defendant.	*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: _____