

CRIMINAL COMPLAINT

**STATE OF MIDSTATE
COUNTY OF DARROW**

**SECOND JUDICIAL DISTRICT
COURT FILE NO. 1467**

State of MIDSTATE,
Plaintiff,

CRIMINAL COMPLAINT

v.

Agnes Olafson
and Luther
Becklund
Defendants

COMPLAINT

The Complainant, being duly sworn to the above-named Court states that there is probable cause to believe that the defendant committed the following offense(s). The complainant states that the following facts establish PROBABLE CAUSE:

OFFENSE

This is a very interesting part of the criminal complaint. In most jurisdictions in the United States there must be probable cause to both arrest a defendant and to charge the defendant with the crime. Probable cause means that there is probable cause that a crime was committed and the defendant committed a crime. This section of the complaint tells a condensed story so that the reader: the judge the defense counsel and the defendant can understand the factual basis for the statutory section of this document.

In some jurisdictions the prosecution (the prosecuting authority) prepares a condensed version of the facts. In other jurisdictions the prosecution attaches portions of the police reports.

In this probable cause section the facts must demonstrate Agnes and Luther, working together, committed a variety of offenses. For purposes of this demonstration we have put Agnes and Luther together in the charging document there are strategic To put the two defendants in the same complaint or two charge them with crimes in two separate complaints

This COMPLAINT was subscribed and sworn to before the undersigned this ____ of _____, 2022.

JUDICIAL OFFICER: Allen Smithe

SIGNATURE NAME: *Allen Smithe*

TITLE: District Court Judge

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 arrest or other lawful steps be taken to obtain Defendant(s) appearance in Court, or his detention, if already in custody, pending further proceedings. The Defendant(s) is/are thereof charged with the following felony offenses:

We will now exam Midstate statutes. Compare the statutes with those in your own jurisdiction.

Although this seems to be a simple statute under which to charge Agnes and Luther it is not. Because of the multiple victims, the long occurrence of the theft, the actual value of the property stolen, and other difficulties of proof.

On and between January 1, 2018 and June 5, 2022 in the county of Darrow and the state of Midstate, Agnes and Luther, them and there being, each aiding each other committed the crimes of:

Count 1

609.52 Theft. Whoever does any of the following, commits theft:

- (1) intentionally and without claim of right takes, uses, transfers, conceals or retains possession of movable property of another without the other's consent and with the intent to deprive the owner permanently of possession of the property; or**
- (2) obtains for the actor custody of property by intentionally deceiving the third person with a false representation which is known to be false, made with intent to defraud and which does defraud the person to whom it is made; or**
- (3) by swindling, whether by artifice, trick, device or any other means, obtains property of another person**

609.05 Liability for crimes of another: A person is criminally liable for a crime committed by another if the person intentionally aids, advises, hires, counsels or conspires with or otherwise procures the other to commit the crime

Count 2

609.17 Attempted Theft. Whoever with intent to commit a crime, doesn't act which is a substantial step toward in more than preparation but the Commission of a crime.

609.05 Liability for crimes of another. A person is criminally liable for a crime committed by another if the person intentionally aids, advises, hires, counsels or conspires with or otherwise procures the other to commit the crime

Count 3

609.175 Conspiracy to commit Theft. Whoever conspires with another to commit a crime and in furtherance of the conspiracy one or more of the parties does some overt act in furtherance of such conspiracy.

THEREFORE, Complainant requests that said 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'S NAME: Maddie Skaar **COMPLAINANT'S SIGNATURE:** *Maddie Skaar*

TITLE: Detective Inspector

Being duly authorized to prosecute the offense(s) charged, I hereby approve the Complaint.

DATE: _____ **PROSECUTING ATTORNEY'S SIGNATURE:** *Deborah Barker*

PROSECUTING ATTORNEY: Deborah Barker

TITLE: Assistant County Attorney, Darrow County Attorney Registration# 654321

SUMMONS

THEREFORE You, THE ABOVE-NAMED DEFENDANT(S), ARE HEREBY SUMMONED to appear on the _____ day of _____ at _____ AM/PM before the above-named court at _____ to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

WARRANT
EXECUTE IN STATE OF MIDSTATE

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 MIDSTATE, that the above-named Defendant(s) be apprehended and arrested without delay and brought promptly before the above-named Court (!fin session, and I/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 thereafter as such Judge or Judicial Officer is available) to be dealt with according to law.

ORDER OF DETENTION

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

Bail: Released

Conditions of Release:

Defendant to remain within the state, continue to be employed and attend college and have no contact with the victims.

This COMPLAINT (SUMMONS, WARRANT, ORDER OF DETENTION) duly subscribed and sworn to, is issued by the undersigned Judicial Officer this _____ day of _____.

JUDICIAL OFFICER: Mabel Lindgren

SIGNATURE: *Mabel Lindgren*

TITLE: District Court Judge

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

STATE OF MIDSTATE, COUNTY OF DARROW

Clerk's Signature or File Stamp:

State of MIDSTATE
Plaintiff

RETURN OF SERVICE

v.

I hereby Certify and Return that I have served a copy of this COMPLAINT - SUMMONS, WARRANT, ORDER OF DETENTION upon the Defendant herein Named

Agnes Olafson and
Luther Becklund
Defendant(s).

Signature of Authorized Service Agent:
