

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 16A09472
Court File No. 27-CR-16-21351

State of Minnesota,

Plaintiff,

vs.

CHERYLE LYNN MAUPIN DOB: 07/25/1969

8540 BURTON PLACE
Rice, MN 56367

Defendant.

COMPLAINT

Order of Detention

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), with reference to: 609.52.3(5), 609.52.3(1)

Maximum Sentence: 20 YEARS AND/OR \$100,000

Offense Level: Felony

Offense Date (on or about): 03/15/2016

Control #(ICR#): 16006661

Charge Description: That on or about 3/7/2016, in Hennepin County, Minnesota, CHERYLE LYNN MAUPIN obtained property or services from Innovative Building Concepts (IBC) (victim) by swindling them using artifice, trick, device or other means, and the property or services had an aggregate had a value in excess of Thirty-Five Thousand Dollars (\$35,000.00).

COUNT II

Charge: Theft-By Swindle

Minnesota Statute: 609.52.2(a)(4), with reference to: 609.52.3(2), 609.52.3(5)

Maximum Sentence: 10 YEARS AND/OR \$20,000

Offense Level: Felony

Offense Date (on or about): 01/01/2016

Control #(ICR#): 16006661

Charge Description: That on or about 1/1/2016, in Hennepin County, Minnesota, CHERYLE LYNN MAUPIN obtained property or services from Innovative Building Concepts (IBC) (victim) by swindling them using artifice, trick, device or other means, and the property or services had an aggregate value in excess of Five Thousand Dollars (\$5,000.00).

STATEMENT OF PROBABLE CAUSE

Complainant has investigated the facts and circumstances of this offense and believes the following establishes probable cause:

On July 18, 2016, Bloomington Police received a report of theft by swindle at 849 80th St. W, Bloomington, Hennepin County. Police spoke to J.S., who said that he hired CHERYLE MAUPIN ("Defendant") as an office manager at Innovative Building Concepts ("IBC") in November of 2015. Defendant identified herself as "Cheryle Lynn" and presented an altered Minnesota driver's license for employment. As office manager, Defendant had access to IBC's assets including checking accounts, credit cards, and payroll.

On or around July 4, 2016, J.S. learned that Defendant was using a false name and had previously been convicted of theft. Acting on this information, J.S. conducted an audit IBC's financial records, noticing many irregularities. In particular, J.S. discovered:

1. Unauthorized charges on two company credit cards totaling \$50,529.84.
 2. A fraudulent check drawn on the account of IBC, numbered 41170, dated June 30, 2016, and made payable to Miller Auto in St. Cloud, Minnesota, in the amount of \$7,475.00.
 3. \$600.00 in missing petty cash.
 4. Unauthorized payroll increases to Defendant's salary totaling \$4,640.00.
- J.S. told Police that Defendant was not authorized to use IBC's assets for personal use, including the credit cards and checks. J.S. further told Police that Defendant was never given a raise and did not have consent to alter her payroll.

The check numbered 41170 was a down payment on a 2017 GMC Terrain bearing MN Lic. 859UTT. Police executed a search warrant at Defendant's home on August 11, 2016. Police recovered the GMC Terrain as well as many items purchased via the fraudulent transactions identified above. One of the credit cards was found in the GMC Terrain. The other credit card was found in Defendant's home.

Defendant was in the home when the search warrant was executed and was found hiding in the master bathroom after multiple announcements.

Between March 15, 2016, and July 6, 2016, Defendant stole at least \$38,557.48 via unauthorized use of company credit cards, unauthorized use of company checks, and unauthorized payroll increases.

Between January 1, 2016 and March 14, 2016, Defendant stole at least \$5,320.14 via unauthorized use of company credit cards, unauthorized use of company checks, and unauthorized payroll increases.

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

Donald Rix
Police Officer
1800 W Old Shakopee Rd
Bloomington, MN 55431
Badge: 256

Electronically Signed:
08/12/2016 03:26 PM
Hennepin County, Minnesota

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

Prosecuting Attorney

Zachary Stephenson
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
08/12/2016 03:24 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 on _____, _____ at _____ AM/PM before the above-named court at 401 Fourth Avenue S, Minneapolis, MN 55415 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: \$35,000.00

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: August 12, 2016.

Judicial Officer

Dennis Murphy

Electronically Signed: 08/12/2016 03:34 PM

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

**COUNTY OF HENNEPIN
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

CHERYLE LYNN MAUPIN

Defendant

*LAW ENFORCEMENT OFFICER RETURN OF SERVICE
I hereby Certify and Return that I have served a copy of this Order of
Detention upon the Defendant herein named.*

Signature of Authorized Service Agent: