

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 23A08768  
Court File No. 27-CR-23-16124

**State of Minnesota,**  
Plaintiff,

**COMPLAINT**  
Order of Detention

vs.

**BARONITA ROSTAS DOB: 10/23/1998**

Unknown

Defendant.

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(2), 609.52.3(5)

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

Offense Level: Felony

Offense Date (on or about): 03/11/2023

Control #(ICR#): 23001454

Charge Description: That on or between 3/11/2023 and 07/27/2023, in Hennepin County, Minnesota, BARONITA ROSTAS obtained property or services from the victim by swindling him/her 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:

Your Complainant is a Special Agent with the Minnesota Department of Commerce Fraud Bureau, tasked with investigating financial crimes.

In June 2023, CFB agents began investigating members of a Roma organized crime group who are involved in “quick change” or “sleight of hand” distraction thefts occurring at retail stores all around the United States. Your Complainant began this investigation after receiving information from Organized Retail Crime Investigators with TJX Companies who operate T.J. Maxx, Marshalls, Homegoods, Sierra and other retail stores around the country. TJX investigators have identified several members of the Roma organized crime group involved in these schemes, including Defendant herein BARONITA ROSTAS. The investigation showed that Defendant ROSTAS has traveled around the country and successfully engaged in this retail fraud scheme for several years, along with other members of the Roma organized crime group.

TJX Organized Retail Crime Investigators familiar with the investigation describe the “sleight of hand” or “quick change” scheme used by Defendant ROSTAS and others as follows:

Subject(s) enter the Register Queue with selected merchandise

Subject(s) approach a Register with a cashier that is deemed vulnerable, present the selected merchandise for purchase, and begin to converse with the cashier

Subject(s) display multiple stacks of \$100.00 in \$20.00 bills of U.S. currency.

Subject(s) retrieve the payment tender for a “re-count”

Subject(s) strategically place a finger within the stack of U.S. currency and ask the cashier for the total amount due from the register screen.

While the cashier is looking at the screen, Subject(s) conduct a sleight of hand scheme and remove a portion of the U.S. currency.

Subject(s) provide the remainder of the U.S. currency to the cashier and take full possession of the bills removed from the stack during the sleight of hand scheme.

Subject(s) receive the proper amount of change based on the original transaction and the transaction receipt from the cashier, and take possession of the merchandise.

Subject(s) exit the store and later present the merchandise for return at a different store for its full value.

The investigation showed that Defendant ROSTAS and others travelled to Minnesota several times over a period of approximately six months and engaged in successful or attempted “sleight of hand” quick change schemes at multiple Twin Cities retail establishments. Each of these transactions was documented on surveillance video and/or through store transaction details and imagery. Information from TJX investigators and an international criminal analyst who has been documenting the Roma criminal organization for many years shows that Defendant ROSTAS has engaged in the quick change scheme around the United States

since at least 2018.

CFB Investigators have reviewed surveillance video and other documentation in the current case and learned the following:

On March 14, 2023, Defendant ROSTAS entered the Marshalls store in the City of Eagan, Dakota County, Minnesota. Defendant ROSTAS approached the register and provided \$1,240.00 in U.S. currency, placing the cash in multiple stacks in front of the cashier. Defendant ROSTAS collected the cash and placed two fingers within the stack removing all but \$240.00 of the cash which she presented to the cashier to complete the transaction. This incident caused a total loss of \$1,000.00.

On March 14, 2023, Defendant ROSTAS entered the Marshall's store in the City of Roseville, Ramsey County, Minnesota. Defendant ROSTAS approached the register and engaged in an identical scheme causing a loss of \$900.00.

TJX Investigators later made contact with Asset Protection personnel at the Gap Inc. who provided documentation of Defendant ROSTAS engaging in multiple quick change schemes at their stores between March 13 and March 14, 2023. These thefts occurred at the Old Navy store in the City of Albertville, the Athleta store in the City of Maple Grove, Hennepin County, Minnesota, and the Old Navy store in the City of St. Louis Park, Hennepin County, Minnesota, resulting in a loss of over \$1,800.00. Information provided by Gap Inc. also showed that Defendant ROSTAS engaged in the identical scheme at their stores in the State of Iowa multiple times between March 11-12, 2023, prior to traveling to Minnesota.

On May 2, 2023, Defendant ROSTAS entered the Sierra store in the City of Richfield, Hennepin County, Minnesota. Defendant ROSTAS conducted two separate "sleight of hand" schemes causing an overall loss of \$1,800.00.

The investigation further showed that Defendant ROSTAS continued to engage in these retail schemes starting again on July 21, 2023, in a Gap store in Gaston, North Carolina.

By July 26, 2023, Defendant ROSTAS had traveled to West Des Moines, Iowa, where she successfully completed a quick change scheme at a Marshall's store. The investigation later showed that Defendant ROSTAS completed a receipt return of the merchandise purchased in West Des Moines through the scheme at the Marshall's store in the City of Minnetonka, Hennepin County, Minnesota on July 27, 2023.

On July 27, 2023, TJX Investigators were alerted in real time that Defendant ROSTAS attempted a quick change scheme at the T.J. Maxx in the City of Eagan but was unsuccessful. Investigators initiated surveillance of Defendant ROSTAS as she left the Eagan T.J. Maxx. Investigators observed Defendant ROSTAS and her husband drive to multiple retail stores throughout the metro area. Defendant ROSTAS attempted a quick change scheme at the Burlington store in the City of Richfield but was unsuccessful. Defendant ROSTAS and her husband also made several returns of merchandise which were documented and held.

Investigators learned that prior to their surveillance on July 27, 2023, Defendant ROSTAS successfully engaged in a quick change scheme at the Sierra Store in the City of Woodbury, Washington County, Minnesota, resulting in \$780.00 in loss.

Defendant ROSTAS was arrested by St. Louis Park Police on July 28, 2023, near the Hilton Double Tree Hotel where she had been staying along with her husband.

During a search of Defendant ROSTAS' vehicle and person, officers recovered large amounts of cash and

extensive retail merchandise, receipts, and gift cards.

In total, the Defendant's ongoing "sleight of hand" quick change scheme that was documented throughout the metro area resulted in \$6,280.00 in loss between March 14, 2023 and July 27, 2023. The investigation is ongoing.

Defendant ROSTAS is currently in custody. Defendant ROSTAS is a Romanian national, is transient and is a significant flight risk.



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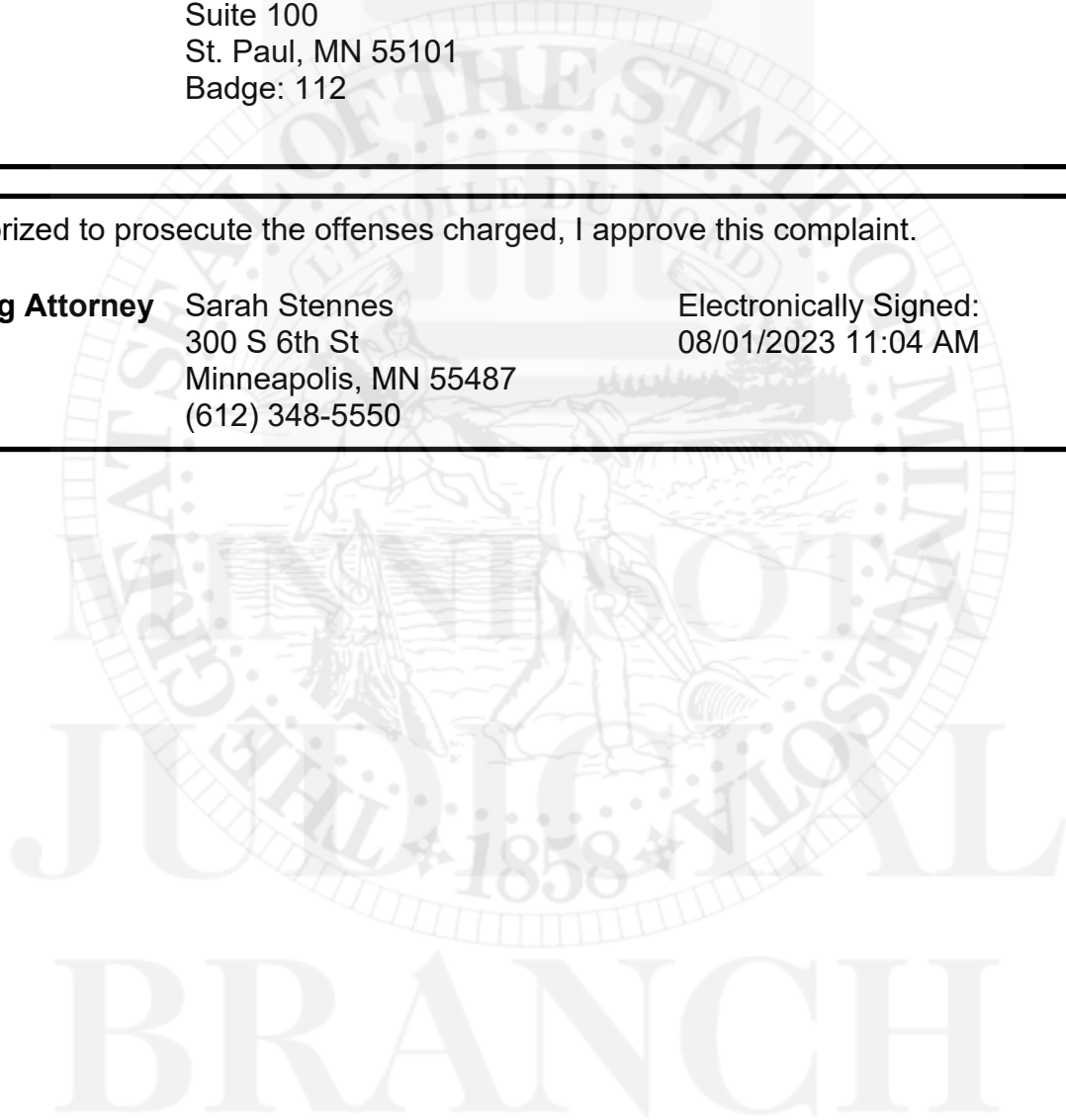
Complainant requests that Defendant, subject to bail or conditions of release, be:  
(1) arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or  
(2) detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according 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.

<b>Complainant</b>	Markham L Stock Supervisory Special Agent 85 7th Place East Suite 100 St. Paul, MN 55101 Badge: 112	Electronically Signed: 08/01/2023 11:19 AM Ramsey County, MN
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Being authorized to prosecute the offenses charged, I approve this complaint.

<b>Prosecuting Attorney</b>	Sarah Stennes 300 S 6th St Minneapolis, MN 55487 (612) 348-5550	Electronically Signed: 08/01/2023 11:04 AM
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**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 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: \$100,000.00

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 1, 2023.

**Judicial Officer**

Tamara Garcia  
District Court Judge

Electronically Signed: 08/01/2023 11:25 AM

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

**COUNTY OF HENNEPIN  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**BARONITA ROSTAS**

Defendant

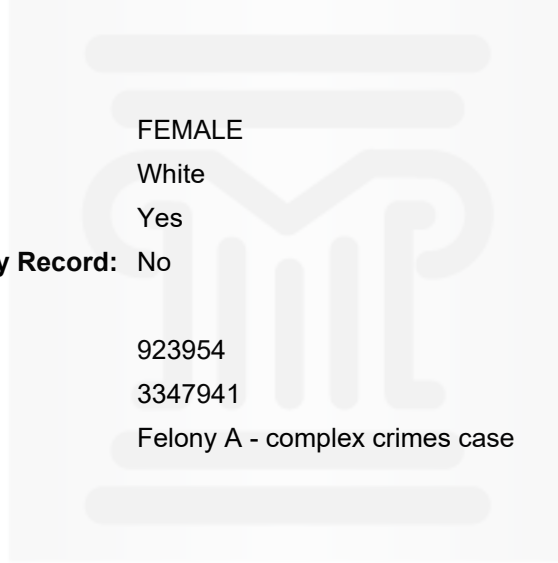
**LAW ENFORCEMENT OFFICER RETURN OF SERVICE**  
*I hereby Certify and Return that I have served a copy of this Order of Detention upon the Defendant herein named.*

Signature of Authorized Service Agent:

27-CR-23-16124  
**DEFENDANT FACT SHEET**

Filed in District Court  
State of Minnesota  
8/1/2023

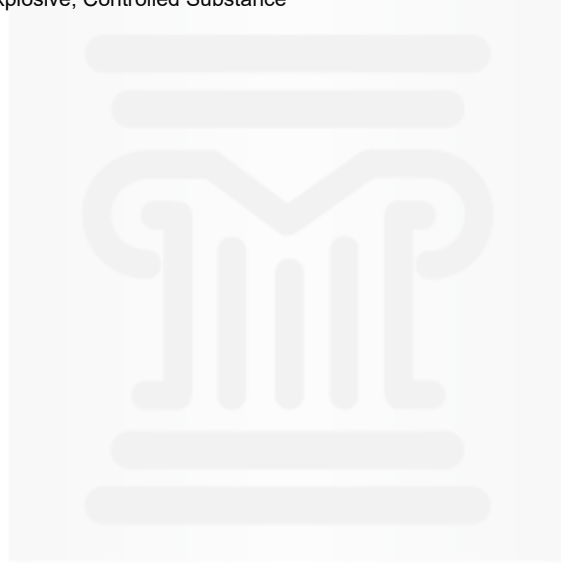
**Name:** BARONITA ROSTAS  
**DOB:** 10/23/1998  
**Address:** Unknown  
**Alias Names/DOB:**  
**SID:**  
**Height:**  
**Weight:**  
**Eye Color:**  
**Hair Color:**  
**Gender:** FEMALE  
**Race:** White  
**Fingerprints Required per Statute:** Yes  
**Fingerprint match to Criminal History Record:** No  
**Driver's License #:**  
**SILS Person ID #:** 923954  
**SILS Tracking No.** 3347941  
**Case Scheduling Information:** Felony A - complex crimes case  
**Alcohol Concentration:**



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**STATUTE AND OFFENSE GRID**

<b>Cnt Nbr</b>	<b>Statute Type</b>	<b>Offense Date(s)</b>	<b>Statute Nbrs and Descriptions</b>	<b>Offense Level</b>	<b>MOC</b>	<b>GOC</b>	<b>Controlling Agencies</b>	<b>Case Numbers</b>
1	Charge	3/11/2023	609.52.2(a)(4) Theft-By Swindle	Felony	U1062		MN062095Y	23001454
	Modifier	3/11/2023	609.52.3(5) Theft - Theft-Value \$500 or less or aggregate subd. 2, clauses (1), (2), (3), (4), (13) or (19)	No-Level	U1062		MN062095Y	23001454
	Penalty	3/11/2023	609.52.3(2) Theft - Value over \$5,000 or trade secret, explosive, Controlled Substance I or II	Felony	U1062		MN062095Y	23001454



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