

State of Minnesota
County of Anoka

District Court
10th Judicial District

Prosecutor File No.
Court File No.

CA-2017-00239

State of Minnesota,
Plaintiff,

COMPLAINT
Order of Detention

vs.

JAMES PAUL ALLEN DOB: 07/23/1964
11215 Terrace Road NE
Blaine, MN 55449
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 (Over \$35,000)
Minnesota Statute: 609.52.2(a)(4), with reference to: 609.52.3(1)
Maximum Sentence: 0-20 Years and/or \$30,000.00 - \$100,000.00
Offense Level: Felony

Offense Date (on or about): 07/01/2016

Control #(ICR#): 16275139

Charge Description: On or about July 1, 2016, in the County of Anoka, Minnesota, JAMES PAUL ALLEN, did by swindling, whether by artifice, trick, device, or any other means, obtain property or services from another person, and the value of the property or services stolen is more than \$35,000.

STATEMENT OF PROBABLE CAUSE

On January 10, 2017, D.O., treasurer of a local snowmobile club reported to Blaine Police Department that in early November 2016 she noticed several suspicious checks in their checking account. D.O. found the fraudulent checks were written to Good Steward Bookkeeping of Minnesota, LLC, a business owned and operated by **JAMES PAUL ALLEN (DOB 7/23/1964)**, hereinafter Defendant. Defendant was hired in April 2015 as bookkeeper for the snowmobile club. Defendant was given the club's only laptop, scanner, hard drive and check stock. Defendant was paid by the hour and would receive 1-2 paychecks per month for his services. Defendant would provide D.O. or J.M., the past treasurer and a member of the club, with invoices as well as a printed check that he printed on the check stock. If the check was less than \$1,000, only one of the club's authorized signers needed to endorse it. If the check was over \$1,000, two authorized signers would need to endorse it. D.O., J.M. and the president of the club were the only authorized signers.

D.O. found that checks were being written to Good Steward Bookkeeping of Minnesota, LLC on an almost daily basis from October 2015 to November 2016. All of the checks were deposited at Financial One Credit Union, 10210 Baltimore St. NE, Blaine, Anoka County, Minnesota into Good Steward Bookkeeping's account. The checks contained forged signatures from D.O. or J.M.

In November 2016, D.O. and J.M. went to Defendant's home. They recovered the club's computer, check stock, scanner and hard drive. Upon opening the laptop, D.O. went into the QuickBooks program and found the forged checks had been hidden in a general fund equity account. They were back dated to a previous fiscal year to prevent the forged checks from being discovered on the current fiscal year's report.

In total, 78 fraudulent checks totaling \$71,620.22 were forged with either D.O.'s or J.M.'s signature on the bottom of the checks from September 9, 2015 to November 1, 2016.

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

Joseph Matzke
Officer J. Matzke #161
10801 TOWN SQUARE DRIVE
NE
BLAINE, MN 55449
Badge: 161

Electronically Signed:
02/07/2017 08:55 AM
Anoka County, Minnesota

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

Prosecuting Attorney

Laura M. Schwartz
Assistant County Attorney
2100 3rd Ave
Anoka, MN 55303-2265
(763) 323-5550

Electronically Signed:
02/07/2017 08:32 AM

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 325 E Main Street, Anoka, MN 55303 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: \$

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: Feb 7, 2017

Signature: [Signature]

Date: Feb 7, 2017

Time: 9:08 am

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

COUNTY OF ANOKA
STATE OF MINNESOTA

State of Minnesota

Plaintiff

vs.

James Paul Allen

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: