

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 15A00724
Court File No. 27-CR-16-5340

State of Minnesota,
Plaintiff,

COMPLAINT
Warrant

vs.

DAVID JOHN VANZO DOB: 12/08/1958

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: Financial Exploitation-Vulnerable Adult-Breach of Fiduciary Obligation - Fail Provide Care

Minnesota Statute: 609.2335.1(1)(i), with reference to: 609.52.3(1)

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

Offense Level: Felony

Offense Date (on or about): 08/28/2012

Control #(ICR#): 15000669

Charge Description: That on or about August 28, 2012, through January 5, 2015, in Plymouth, Hennepin County, Minnesota, DAVID JOHN VANZO, in breach of a fiduciary obligation recognized by law, including pertinent regulations, contractual obligations, documented consent by a competent person, or the obligations of a responsible party under Minn. Stat. 144.6501, intentionally failed to use the real or personal property or other financial resources of a vulnerable adult to provide food, clothing, shelter, health care, therapeutic conduct or supervision for said vulnerable adult resulting in a loss to the vulnerable adult, C.V., and said loss had a value in excess of Thirty-Five Thousand Dollars (\$35,000.00).

COUNT II

Charge: Financial Exploitation-Vulnerable Adult- Uses/Manages or Takes Property For Benefit of Someone Else.

Minnesota Statute: 609.2335.1(1)(ii), with reference to: 609.52.3(1)

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

Offense Level: Felony

Offense Date (on or about): 08/28/2012

Control #(ICR#): 15000669

Charge Description: That on or about August 28, 2012, through January 5, 2015, in Plymouth, Hennepin County, Minnesota, DAVID JOHN VANZO, in breach of a fiduciary obligation recognized by law, including pertinent regulations, contractual obligations, documented consent by a competent person, or the obligations of a responsible party under Minn. Stat. 144.6501, intentionally used, managed, or took the

real or personal property or other financial resources of a vulnerable adult, whether held in the name of said vulnerable adult or a third party, for the benefit of someone other than said vulnerable adult, resulting in a loss to the vulnerable adult, C.V., and said loss had a value in excess of Thirty-Five Thousand Dollars (\$35,000.00).

COUNT III

Charge: Criminal Neglect - Knows/reason to know deprivation will result in substantial or great bodily harm

Minnesota Statute: 609.233.1a(1), with reference to: 609.233.3(2)

Maximum Sentence: 5 YEARS AND/OR \$5,000

Offense Level: Felony

Offense Date (on or about): 07/05/2014

Control #(ICR#): 15000669

Charge Description: That on or about July 5, 2014, through January 5, 2015, in Plymouth, Hennepin County, Minnesota, DAVID JOHN VANZO intentionally deprived a vulnerable adult of necessary food, clothing, shelter, health care, or supervision, while being reasonably able to make the necessary provisions, and knew or had reason to know the deprivation could likely result in substantial bodily harm to the vulnerable adult, C.V.

COUNT IV

Charge: Theft-By Swindle

Minnesota Statute: 609.52.2(a)(4), with reference to: 609.17.4(2), 609.52.3(1)

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

Offense Level: Felony

Offense Date (on or about): 01/13/2015

Control #(ICR#): 15000669

Charge Description: That on or about January 13, 2015, in Plymouth, Hennepin County, Minnesota, DAVID JOHN VANZO, attempted to obtain property or services from UBS Financial Services Inc. by swindling it using artifice, trick, device or other means, and the property or services had a value in excess of Thirty-Five Thousand Dollars (\$35,000.00).

STATEMENT OF PROBABLE CAUSE

Your complainant is a Detective at the Plymouth Police Department and has investigated allegations that David John Vanzo, DOB 12/08/1958, Defendant herein, financially exploited his 90-year old mother, C.V., from approximately August 2012 until her death on January 5, 2015, and simultaneously deprived C.V. of necessary health care causing C.V. substantial bodily harm. As part of this investigation, Complainant has reviewed reports from the Hennepin County Medical Examiner and Hennepin County Adult Protective Services, obtained and analyzed numerous bank records from various banking institutions, reviewed and conducted interviews of individuals with knowledge of the pertinent facts, obtained and reviewed medical records pertaining to C.V., and examined various other items of evidence obtained from numerous sources, including a search of Defendant's home executed pursuant to lawful warrant. Your complainant believes the following establishes probable cause that Defendant committed the offenses of financial exploitation of a vulnerable adult, felony deprivation by a caregiver, and attempted theft by swindle.

THE DEATH OF C.V.

Defendant resided with his mother, C.V., at 1720 Weston Lane N, Plymouth, Hennepin County, Minnesota, from 2007 until C.V.'s death in 2015. On January 5, 2015, at approximately 10:30 p.m., officers responded to a call reporting C.V.'s death. Defendant led the officers to C.V.'s body located in a bedroom on the upper level of the split-entry home. C.V. was not breathing, had no pulse, was cold to the touch, and her fingertips were starting to turn black. C.V. wore a fake fur jacket over a green robe and black boots, and was positioned with her head toward the foot of the bed. The bed on which C.V. was lying had no sheets or covers on it, was heavily soiled, and appeared to be soaked with urine or some other fluid. C.V.'s jacket was soiled and falling apart, the soles of her boots were peeling off and covered in feces, and C.V. wore no socks. The Medical Examiner arrived to inspect C.V.'s body and discovered C.V. had extreme bed sores and was covered in feces. The Medical Examiner advised the pain associated with the sores would have been excruciating and unbearable. The Medical Examiner estimated C.V. was deceased for 4-6 hours.

Officers noted C.V.'s room was covered in dirt and debris, and described the condition of the entire home as deplorable. There was trash throughout the living room and kitchen, holes in the walls, the carpet was almost black, and the house smelled overwhelmingly of urine and feces. Officers reported the kitchen was uninhabitable—completely soiled, covered in dust and layers of an undetermined substance.

In the lower level of the home, officers noted garbage and debris everywhere, and bloody rags and tissues covered in an unknown substance were located throughout the lower level. In the lower level living room there was a chair set up in front of a television and computer, both of which were covered in thick layers of dust, grime, and an unknown substance. The computer keyboard was completely covered in thick layers of undetermined substances, and the computer was playing pornographic material. Officers reported the lower level bathroom was incomprehensibly unsanitary. The toilet was covered in mold and appeared to be leaking onto the floor, and the bathroom sink was full of garbage and medication. Officers located Defendant's bedroom in the lower level and observed what appeared to be biological matter all over the walls as well as bloody tissues and paper covered in an unknown substance.

Officers began investigating the circumstances of C.V.'s death. Officers learned that around 4 p.m. on January 5, 2015—approximately six hours before Defendant reported C.V.'s death—Defendant and C.V. visited a Wells Fargo Bank branch and made a cash withdrawal in the amount of \$850 from C.V.'s account, of which she was the sole owner. Bank employees noted C.V. was slumped over and unresponsive in a wheelchair, with her feet dragging on the floor as Defendant wheeled her out of the bank after obtaining cash. Bank employees were familiar with Defendant and C.V.; they made frequent cash withdrawals from the branch and had caused issues at the branch previously. On one occasion, C.V. urinated on the floor. On

another occasion, Defendant become angry and belligerent when bank employees attempted to speak with C.V. separately from Defendant. Bank employees stated when Defendant and C.V. came in to cash checks, Defendant already had the checks and documentation prepared and produced the items directly to bank tellers without C.V.'s involvement.

Defendant and C.V. had been transported to Wells Fargo by M.J., a cab driver Defendant frequently called for transportation. M.J. confirmed he picked up Defendant and C.V., took them to Wells Fargo, and took them back to their home around 4:15 p.m. M.J. told officers C.V. was not doing well and appeared to be sleeping. M.J. further reported that for the approximate four or five months he had been driving Defendant and C.V., C.V. was never physically able to engage in conversation. M.J. stated that on January 5, 2015, after returning from Wells Fargo, Defendant took C.V. into the house and then had M.J. drop Defendant at Buffalo Wild Wings around 4:30 p.m. Defendant reported C.V.'s death approximately six hours later.

C.V.'s death and its circumstances prompted police to investigate the activity on C.V.'s financial accounts and C.V.'s medical care history. This investigation revealed Defendant financially exploited C.V. in the amount of approximately \$260,000 while failing to provide her with adequate care.

FINANCIAL EXPLOITATION

Activity on Victim's Bank Accounts

Complainant undertook a thorough review of C.V.'s financial accounts and made the following observations:

From January 2012 through August 2012, C.V. withdrew \$2,200 to \$2,750 every month by cashing one check for cash from her Anchor Bank account ending in 990. On August 28, 2012, Defendant became C.V.'s attorney-in-fact through the completion of a Power of Attorney (POA) form. Utilizing the POA, Defendant and C.V. promptly opened TCF Bank account ending in 4936 in C.V.'s name ("the TCF account"). The TCF account was not a joint account and Defendant had access to the funds solely through his appointment as C.V.'s attorney-in-fact.

Based on C.V.'s medical history and Defendant's own statements, both discussed below, there is doubt as to the validity of the POA. Nevertheless, Defendant used it to access and steal C.V.'s funds. Almost immediately after Defendant obtained power of attorney, the activity on C.V.'s financial accounts changed dramatically, resulting in large sums of money being funneled through and out of the TCF account.

Theft: Reverse Mortgage – \$115,655

In September 2012, a check in the amount of \$115,654.64 drawn from America's Reverse Title was deposited into the TCF account. The source of these funds was a reverse mortgage taken on C.V.'s home. In a series of cash withdrawals, Defendant fully depleted the funds obtained in the reverse mortgage within a mere 6 months.

Between October and December 2012, Defendant removed \$57,300 from the TCF account via checks for cash. Whereas the victim previously cashed one check per month, after Defendant became POA and opened the TCF account the pattern changed to two checks per month each written in the amount of \$9,500.

10/3/2012 – check #5003 cashed for \$9,500
10/16/2012 – check #5005 cashed for \$9,500
11/7/2012 – check #5004 cashed for \$9,500
11/20/2012 – check #5013 cashed for \$9,500

12/5/2012 – check #5017 cashed for \$9,500
12/19/2012 – check #5018 cashed for \$9,800

This pattern continued into 2013, at the increased amount of \$9,800 per check. In the first three months of 2013, Defendant removed \$78,400 from the TCF account.

1/11/2013 – check #5019 cashed for \$9,800
1/25/2013 – check #5024 cashed for \$9,800
2/15/2013 – check #5029 cashed for \$9,800
2/22/2013 – check #5030 cashed for \$9,800
3/1/2013 – check #5031 cashed for \$9,800
3/8/2013 – check #5026 cashed for \$9,800
3/15/2013 – check #5037 cashed for \$9,800
3/22/2013 – check #5038 cashed for \$9,800

By the end of March 2013, the \$115,655 obtained through the reverse mortgage just six months prior was more than fully depleted; between October 2012 and March 2013, Defendant withdrew \$135,700 in cash from C.V.'s account.

Theft: DWS Investment Account – \$77,885

On July 16, 2013, a deposit in the amount of \$77,885.72 was made into the TCF account. These funds were drawn from the victim's investment account maintained by Deutsche Asset and Wealth Management ("DWS") and the source was a single redemption check made payable to C.V. This redemption fully depleted the DWS account. Withdrawal activity on the TCF account immediately resumed at an accelerated rate. Nearly daily withdrawals were made for the rest of July 2013, until the DWS retirement funds were more than fully depleted. In the span of 22 days, Defendant withdrew \$88,600 from the TCF account:

7/10/2013 – check #5050 cashed for \$8,500
7/16/2013 – check #5051 cashed for \$3,000
7/19/2013 – check #5052 cashed for \$9,800
7/22/2013 – check #5062 cashed for \$9,800
7/23/2013 – check #5063 cashed for \$9,800
7/24/2013 – check #5064 cashed for \$9,800
7/25/2013 – check #5065 cashed for \$9,800
7/26/2013 – check #5066 cashed for \$9,800
7/29/2013 – check #5068 cashed for \$9,800
7/31/2013 – check #5070 cashed for \$8,500

Theft: Ford Motor Company Retirement Account – \$37,000

Defendant's pattern of accessing large sums of money from his mother's source accounts and subsequently converting the funds to cash through the use of the TCF account continued. On July 31, 2013, \$37,006.77 drawn from a Ford Motor Company General Retirement Plan account, of which the victim was the beneficiary, was deposited into the TCF account. Paperwork requesting the lump sum disbursement contained a handwritten note by Defendant directing how to address the check. Immediately following the Ford disbursement to the TCF account, withdrawal activity resumed. The Ford retirement funds were nearly fully depleted in a series of cash withdrawals made within a mere five days:

8/1/2013 – check #5071 cashed for \$6,500
8/2/2013 – check #5072 cashed for \$9,900
8/5/2013 – check #5073 cashed for \$9,900

8/5/2013 – check #5074 cashed for \$9,900

At this point, activity in the TCF account mostly ceased. One month later, on September 4, 2013, Defendant opened Wells Fargo account ending in 7451 in the victim's name ("the Wells Fargo account"). It was from this account that Defendant obtained \$850 cash the day of C.V.'s death.

Complainant has examined copies of the checks detailed above and notes the following: the checks are written in print handwriting and appear to be signed by C.V. Complainant compared the checks at issue above with checks drawn on C.V.'s accounts prior to the appointment of Defendant as attorney-in-fact. That comparison reveals that, prior to Defendant's appointment as attorney-in-fact, C.V. wrote checks in cursive—not print—and that cursive writing matches police reports and letters previously written and signed by C.V., including notarized documents. In contrast, the print handwriting on the checks at issue matches print handwriting identified as Defendant's. Complainant's observations corroborate statements by bank employees that Defendant presented pre-completed checks to withdraw funds from C.V.'s accounts.

Attempted Theft: UBS Investment Account – \$84,400

On January 13, 2015—eight days after C.V.'s death—Defendant contacted UBS Financial Services Inc. ("UBS") in a recorded phone call, represented himself as C.V.'s power of attorney, and closed C.V.'s UBS Investment Account. Defendant fully liquidated the account and obtained a check disbursement for the full remaining balance of \$84,396.03.

In the recorded phone call to UBS, Defendant stated, "We want to close the account . . . and get paid." Defendant failed to inform UBS that C.V. was deceased, which immediately terminated Defendant's power of attorney and left Defendant with no authority to direct transactions on the UBS account. Rather than informing UBS of C.V.'s death, Defendant asked if UBS could issue the check directly to him rather than C.V. When informed the check could only be issued to C.V., Defendant again questioned, "How would I get that to be sent to my name?" UBS informed Defendant the account belonged to C.V. and that Defendant had access to the account only through his appointment as attorney-in-fact. Defendant again failed to inform UBS he was no longer C.V.'s attorney-in-fact.

In response to Defendant's instructions to fully liquidate the account, and relying on Defendant's representation that he was C.V.'s attorney-in-fact, UBS issued and sent a check in the amount of \$84,396.03. UBS was subsequently informed of C.V.'s death by the administrator of C.V.'s estate and stopped payment of the check prior to its negotiation.

Defendant's Financial Activity / Use of C.V.'s Funds

For the entire offense period—from August 2012 until C.V.'s death in January 2015—Defendant was unemployed, earned no income, and contributed no money to the household. Thus, C.V.'s financial assets were the exclusive source of support for Defendant and C.V. Defendant confirmed as much in a non-custodial, recorded statement to police.

An examination of various records reveals where C.V.'s funds were ultimately distributed.

In a lawfully executed search of Defendant's and C.V.'s home, officers recovered several documents regarding Green Dot reloadable prepaid cards. A Green Dot card can be used like a debit card to make purchases and can also be used at an ATM to withdraw cash. A Green Dot card is not a line of credit, but rather is prepaid and may be reloaded with additional funds. Officers obtained and executed a search warrant for Green Dot records related to the cards and information recovered from Defendant's home, and learned the following:

Between September 2012 and November 2014, Green Dot cards linked to Defendant were funded with cash in the amount of \$51,220.87. Almost \$44,000 of those card reloads occurred in Plymouth at Walgreens store number 1002, located at 3255 Vicksburg Ln N; Walgreen store number 12510, located at 6025 Shenandoah Ln N; and CVS store number 6811, located at 4140 County Road 101. These three stores are located within 5 miles of where Defendant resided in his mother's house.

Green Dot records further indicate the cards were used to make payments at internet sites such as seekingarrangement.com; pay-lovbill.com; pay-vrnhelp.com, a website that processes payment for "Premium Niche Dating Sites"; cgxpay.com, which provides "discreet billing for adult dating websites"; and scbills.com, a site that processes payment for membership in "sugar daddy dating websites." Four cards were issued to women, at least one of whom Defendant met through the online dating site seekingarrangement.com. Evidence of Defendant's use of another prepaid card service, Netspend, was also recovered during the search of Defendant and C.V.'s home.

The computer located in the lower level of the home, and identified by Defendant as his, was seized during the search of Defendant's home. A forensic review of the computer revealed Defendant frequented a variety of dating, pornographic, and classified websites advertising "escort services," including backpage.com. Also recovered during the forensic review of the computer was a letter, later identified as having been written by L.B., to Defendant addressing money Defendant had provided to L.B. and asking for more. In a recorded interview with law enforcement, L.B. stated she met Defendant on seekingarrangement.com. L.B. confirmed that in July 2014 she emailed the letter to Defendant to account for \$5,000 he had provided to her in the past. In the letter, L.B. also asked Defendant to provide her via Green Dot an additional \$500 and send \$5,000 via FedEx. Evidence of other FedEx shipments was recovered during the execution of the search warrant at Defendant's residence.

Investigators also recovered from the computer Skype conversations between Defendant—holding himself out as "Tony Giovanzo"—and various individuals. On several occasions, Defendant stated he spent significant amounts of money on sports gambling. For example, on May 19, 2012, Defendant stated in a conversation with N.F. that he had "50k" on two NBA basketball games, and on May 22, 2012, Defendant stated he had "100 k on 2 bets." Investigators also recovered evidence of sports gambling during the search of Defendant's home. Two notebooks detailing bets were found on top of the keyboard in front of Defendant's computer; the computer was turned on and a pen was lying on top of the open notebooks.

In Defendant's Skype conversations, he also made statements about giving money to various women and his position as a "sugardaddy." For example, on June 25, 2012, Defendant stated, "I'm a sugardaddy till the day I die!" Additionally, the exchange of money for sex acts is mentioned in various conversations, including with T.B. on April 3, 2012; with R. on April 3, 2012; with A.Q. on April 21, 2012; with K.A. on April 30, 2012; with T. on June 5, 2012; and with J. on June 19, 2012. On August 12, 2014, Defendant asked L.L., "Can I send u money to see u on cam?" And on September 21, 2012, Defendant asked N.F. for her address and stated he was "sending \$\$\$."

While the investigation showed Defendant spent C.V.'s money on gambling and women and related activities, the investigation also revealed Defendant did not use C.V.'s funds to pay for C.V.'s expenses. For example, collection notices reveal that in 2013 and 2014 C.V. was past due on medical bills owed to Health Partners, North Memorial Health Care, North Memorial Ambulance Service, and Minneapolis Radiology in the amount of \$1,274.23. Additionally, between May 31, 2014, and C.V.'s death on January 5, 2015, C.V. accumulated outstanding debt to her homeowners' association in the amount of \$4,807.64. Finally, in the months preceding C.V.'s death, Defendant made no expenditures on medication, medical care, or therapeutic services for C.V. By Defendant's own statement, Defendant provided no such care to C.V. following her hospitalization in 2013, discussed below, until her death in 2015.

C.V. had two surviving children besides Defendant—L.V.G. and M.T. After Defendant moved to C.V.'s home in 2007, C.V. became isolated from her other children, family, and friends. But prior to C.V.'s health decline she had completed a Last Will and Testament, in which she directed her estate to pass to her three children in equal parts. Defendant successfully thwarted C.V.'s estate plan by accessing and draining C.V.'s accounts prior to her death, and attempting to liquidate the UBS account prior to the administration of C.V.'s estate, thereby financially exploiting and stealing from C.V. and usurping the inheritance C.V. intended for her other two children.

NEGLECT AND DEPRIVATION OF CARE

C.V.'s Medical History

On January 14, 2006, while living alone at the age of 81, C.V. called 911 and was admitted to North Memorial Hospital for four nights with a diagnosis of stroke. In the social history section of the physician notes, C.V. reported having two daughters who live far away. There is no mention of her son, Defendant. The Emergency Department notes indicate C.V. was alert and orientated, in agreement with the decision to admit her to the hospital, and "would like to find out what happened."

On March 5, 2006, C.V. was again seen in the Emergency Department after becoming faint at church. C.V. told doctors she had not eaten any breakfast and she did not take her blood pressure or any of her medicines, which was unusual for her. C.V. was not admitted to the hospital on this occasion.

Approximately one year later, Defendant started living in C.V.'s home. In the years that followed, C.V. became isolated from her friends and family, including her two daughters L.V.G. and M.T., both of whom lived out of state. L.V.G. and M.T. were unable to contact their mother by telephone, believed Defendant was preventing their contact and isolating C.V., and were concerned for C.V.'s safety and wellbeing. On numerous occasions, L.V.G. and M.T. requested that police check the welfare of C.V.

As early as 2008, C.V. was forgetful and confused. By 2012, C.V.'s cognitive impairment had significantly worsened. In Skype conversations between Defendant and various individuals, Defendant made statements regarding C.V.'s state of mind and cognitive impairments. For example, on May 3, 2012, Defendant told A.K., "Moms has no idea what's going on !" On May 4, 2012, Defendant told N.F. that C.V. had "Alz and cancer." Defendant stated, "she needs to pass...she is very miserable !" and said, "she is too hard to control ! wanders all the time !"

But Defendant did not seek medical care or assistance for Defendant. Rather, it was around this time Defendant fully inserted himself into C.V.'s finances. Defendant made the following statements to N.F. on May 4, 2012:

"I just got a letter from ford about my moms stock that she has with them and they are giving me the option to cash it all in now ! I called and found out its 330K !"

"My mom is 84 and makes 42K a year and has 525K in assets !"

"she has no idea at all !"

A few days later, on May 7, 2012, Defendant stated to N.F., "My mom has no clue ! I told her the other day that she is a millionaire and she had no idea what that meant !"

On July 9, 2012, Defendant told N.F. he was experiencing "red tape with [C.V.'s] Ford money !" The following month, Defendant executed the POA and gained full, unfettered access to C.V.'s accounts—

thereby eliminating any "red tape."

C.V. was next seen in the hospital on August 23, 2013. C.V.'s mental and physical health had markedly declined since her prior hospital visit, as had her appearance. When C.V. arrived to the Emergency Department, staff noted she smelled bad and her clothing was filthy. C.V. had moderate progressive dementia, was unable to stand alone, and was experiencing urinary incontinence. By this point, C.V. was allegedly under 24 hour care of her son, Defendant. Initial physician notes state, "at this time, I do not think C.V. can be cared for by her family members; they agree. I think she is vulnerable while at home."

Defendant reported to hospital staff that he was C.V.'s full-time caregiver. Due to C.V.'s dementia, she was unable to answer questions or provide her history. Thus, hospital staff relied on Defendant, representing himself as C.V.'s caregiver and power of attorney, to provide information and take part in decision making.

Defendant reported C.V.'s memory had worsened over the past few months. Defendant admitted C.V. was depressed, but refused medication or a psychiatric evaluation for her. Defendant insisted C.V. didn't want to take any medications, had repeatedly denied medical advice in the past, and did not want any type of medical treatment. Defendant's statements, however, were in sharp contrast to C.V.'s actions and statements made during prior hospitalizations. Moreover, during this hospital stay C.V. willingly took medications.

Although repeatedly offered and advised, Defendant refused all care options suggested for C.V., including home care options such as home physical and occupational therapy or home nursing visits; transfer to a transitional care unit, memory care unit, or skilled nursing facility; and any additional services. Per hospital discharge notes, Defendant and C.V. "feel her dementia is worsening and she is ready to die." Doctors discussed with Defendant the need for 24-hour care for C.V., but Defendant declined home care services, stated he wanted to remain primary caregiver, and denied the need for additional help. C.V. was discharged home in the care of Defendant.

C.V. lived for almost 18 months after her hospital discharge. During this time, C.V. was demented, incapable of providing her own care, and completely dependent on Defendant. Ultimately, C.V. died in her own home, in deplorable conditions, without any medical or comfort care.

Neglect and Deprivation of Care

The Medical Examiners found that C.V. died from dehydration and cachexia, also known as wasting and weakness of the body due to chronic illness. C.V. had stage I and II pressure lesions, also known as bedsores, on her back, buttocks, and thighs. She had one fractured rib and a subdural hematoma. The Medical Examiner also confirmed that C.V. had Alzheimer's Disease consistent with her documented history of dementia.

C.V.'s pressure lesions resulted from her lying in bed and not being turned regularly. Stage I and II bedsores develop over a period of weeks. Had CV received medical care for these bedsores, they could have been treated.

DEFENDANT'S WHEREABOUTS AND HISTORY OF FLEEING

Defendant has a history of stealing from C.V. and fleeing when discovered. In 1995, C.V. discovered Defendant had fraudulently opened several credit cards in C.V.'s name without her knowledge or consent. In sum, C.V. discovered \$26,710 of fraudulent charges. C.V. completed Affidavits of Forgery, closed the accounts, and ultimately filed a police report, opening case number 95101068 with the Plymouth Police Department. In C.V.'s hand-written report to police, she recalled conversations with Defendant in which

Defendant admitted he forged C.V.'s name to open credit cards and incurred tens of thousands of dollars of fraudulent charges.

Defendant was charged with five felony counts of financial transaction card fraud in court file number 27-CR-96-020936. Defendant failed to appear and a warrant was issued for his arrest. Defendant fled the state and avoided apprehension for approximately the next 10 years.

Defendant returned to Minnesota and C.V.'s home in 2007. A report was made to the Plymouth Police on C.V.'s behalf because C.V. wanted Defendant removed from her home, and Defendant was arrested on the outstanding warrant. Ultimately Defendant pleaded guilty and was convicted of one count of financial transaction card fraud. Upon Defendant's release from custody, he returned to C.V.'s home, where he stayed until C.V.'s death in 2015.

Defendant's last known address, as of December 2015, was a Super 8 Motel located at 4250 Koval Lane, Las Vegas, Nevada. Based on Defendant's history of fleeing and Complainant's knowledge that he is not currently located in the State of Minnesota, Complainant requests that a warrant be issued for his arrest.

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

Amy Goodwin
Patrol Officer
3400 Plymouth Blvd
Plymouth, MN 55447-1482
Badge: 87

Electronically Signed:
02/24/2016 03:03 PM
Hennepin County, Minnesota

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

Prosecuting Attorney

Erica Yarlagadda
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
02/24/2016 02:49 PM

