

State of Minnesota
County of Rice

District Court
3rd Judicial District

Prosecutor File No. 0660040966
Court File No. 66-CR-17-2144

State of Minnesota,

Plaintiff,

vs.

PATRICIA DONNA MAE CARON DOB: 06/28/1961

309 11th St NW
Faribault, MN 55021

Defendant.

COMPLAINT

Summons

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)

Maximum Sentence: 10 years or \$20,000 fine, or both

Offense Level: Felony

Offense Date (on or about): 10/26/2016

Control #(ICR#): 16019284

Charge Description: Between August 30, 2014 and February 28, 2015, in the County of Rice, Minnesota, Patricia Donna Mae Caron did obtain possession of property or services from another person of a value more than \$5,000 by means of swindle.

COUNT II

Charge: Theft-By Swindle

Minnesota Statute: 609.52.2(a)(4)

Maximum Sentence: 10 years or \$20,000 fine, or both

Offense Level: Felony

Offense Date (on or about): 10/26/2016

Control #(ICR#): 16019284

Charge Description: On or about Between December 23, 2015 and May 12, 2016, in the County of Rice, Minnesota, Patricia Donna Mae Caron did obtain possession of property or services from another person of a value more than \$5,000, by means of swindle,

COUNT III

Charge: Taxes-false or fraudulent returns-file with commissioner

Minnesota Statute: 289A.63.2(a)

Maximum Sentence: Up to 5 years in prison and/or a fine.

Offense Level: Felony

Offense Date (on or about): 10/26/2016

Control #(ICR#): 16019284

Charge Description: On or about April 15, 2017, in the County of Rice, Minnesota, Patricia Donna Mae Caron did make false statements on her 2016 tax return.

COUNT IV

Charge: Taxes-false or fraudulent returns-file with commissioner

Minnesota Statute: 289A.63.2(a)

Maximum Sentence: Up to 5 years in prison and/or a fine.

Offense Level: Felony

Offense Date (on or about): 10/26/2016

Control #(ICR#): 16019284

Charge Description: On or about On or about April 2016 in the County of Rice, Minnesota, Patricia Donna Mae Caron did make false statements on her 2015 tax return.

COUNT V

Charge: Taxes-false or fraudulent returns-file with commissioner

Minnesota Statute: 289A.63.2(a)

Maximum Sentence: Up to five years in prison and/or a fine.

Offense Level: Felony

Offense Date (on or about): 10/26/2016

Control #(ICR#): 16019284

Charge Description: On or about April 2015, in the County of Rice, Minnesota, Patricia Donna Mae Caron did make false representations on her 2014 tax return

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Complainant and/or Signing Officer designated below, declares under penalty of perjury, that he/she has reviewed police reports relating to the above-named Defendant and the allegations contained herein, and/or has spoken with peace officers having knowledge of the incident, and based upon that information, believes the following to be true and correct.

In late 2016, the Faribault Police Department was contacted by concerned citizens who alleged that the Defendant herein, Patricia Donna Mae Caron, (DOB 6-28-1961) was diverting funds given to a charity SAFE Sanctuary for personal use.

During the investigation of these complaints, the Faribault Police Department reviewed bank, tax, and other records of SAFE Sanctuary and Patricia Caron and determined the following:

SAFE Sanctuary was a Minnesota Corporation organized as a non-profit and it had obtained 501(c)3 status from the IRS.

In the three years reviewed, \$394,611.19 was credited to the SAFE Sanctuary Account.

Over three years Patricia Caron was paid a total of \$18,400 in 16 different checks, some of the checks indicate they were to pay rent from Safe Sanctuary to Patricia Caron for the use of her home as the office of SAFE Sanctuary.

\$4,972.75 was paid out from SAFE Sanctuary as Cash.

Verizon was paid \$3,742.43 by SAFE Sanctuary, an investigation by the Minnesota Attorney General's Office determined this was for an account belonging to Caron's' son, not a business account for SAFE Sanctuary.

\$1,925 was paid to Patricia Caron's daughter from SAFE Sanctuary accounts, though she was not an employee or contractor.

\$1,332.00 was paid by SAFE Sanctuary for student loans.

\$1,196.89 was paid to Steam Games, an online gaming company.

Other vendors paid by SAFE Sanctuary included Ashley Furniture, Slumberland, Fit for Life, Ancestry.com, Maurices, Netflix, Nails by Jordan, Famous Footwear and numerous restaurants.

An Investigator from the Minnesota Department of Commerce reviewed the charges that were made to Amazon.com by SAFE Sanctuary and determined that \$42,623.64 was spent at Amazon.com, and of that, at least \$25,271.19 were personal expenses not related to the business of SAFE Sanctuary.

SAFE Sanctuary claims no employees and did not issue 1099s or W-2 for money paid.

A review of the 2014, 2015, and 2016 tax returns filed by Caron show that she did not claim compensation from SAFE Sanctuary as income from an employer or as an independent contractor.

SAFE Sanctuary had several fundraisers, and charged fees for the adoption of dogs. These funds were not clearly accounted for and were often paid to Caron in cash or by check.

Between August 30, 2014 and February 28, 2015, Caron spent \$6,226.61 in SAFE funds to buy personal items at Amazon.com.

Between December 23, 2015 and May 12, 2016, \$7,000 was paid directly to Patricia Caron from SAFE's checking account, some of which was recorded as rent.

In 2016, Patricia Caron reported \$10,000 in income from rent of her home, during that time period, \$11,500 was paid to her by SAFE, \$9,500 of which was recorded as rent. Caron also claimed the property was used 366 days for business purposes in 2016 and 0 days for personal purposes, but used the property as her residence.

When asked about the conduct of SAFE, Caron responded that she does not "have the best record keeping...." and that "SAFE doesn't make any money."

PLEASE TAKE NOTICE: Pursuant to Minn. Stat. 609.49., intentional failure to appear for duly scheduled court appearances may result in additional criminal charges, and in addition to any arrest warrant that may otherwise be issued by the Court.

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

Brandon Gliem
Detective Sergeant
25 NW 4th Street
Faribault, MN 55021
Badge: 207

Electronically Signed:
08/28/2017 04:39 PM
Rice County, MN

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

Prosecuting Attorney

John Fossum
Rice County Attorney
218 NW 3rd Street
Faribault, MN 55021
(507) 332-6103

Electronically Signed:
08/28/2017 04:19 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 **September 28, 2017 at 10:00 AM** before the above-named court at 218 NW 3rd Street, Faribault, MN 55021 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: August 29, 2017.

Judicial Officer

Christine A Long
Judge

Electronically Signed: 08/29/2017 09:07 AM

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

**COUNTY OF RICE
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Patricia Donna Mae Caron

Defendant

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

Signature of Authorized Service Agent: