

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No.
Court File No.

20A14265
27-CR-21-1977

State of Minnesota,

Plaintiff,

vs.

ANGELIC DENISE NUNN DOB: 01/28/1978

740 E 17th St
Minneapolis, MN 55404

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-Take/Use/Transfer Movable Prop-No Consent

Minnesota Statute: 609.52.2(a)(1), with reference to: 609.52.3(3)(a)

Maximum Sentence: 5 YEARS AND/OR \$10,000

Offense Level: Felony

Offense Date (on or about): 12/05/2020

Control #(ICR#): 20004112

Charge Description: That on or between 12/5/2020 and 12/12/2020, at Target, located at 6445 Richfield Parkway, Richfield, in Hennepin County, Minnesota, ANGELIC DENISE NUNN intentionally and without claim of right, took, used, transferred, concealed or retained possession of movable property belonging to Target without consent and with the intent to deprive the owner/entity permanently of possession of the property, and the property had an aggregate value of more than One Thousand Dollars (\$1,000.00) but less than 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 December 5, 2020, at approximately 12:52 p.m., police responded to a theft report at Target, located at 6445 Richfield Parkway, Richfield, in Hennepin County. A few days later, police also investigated a theft at the same Target on December 12, 2020.

Loss prevention employee, J.L., told police that a female, later identified as ANGELIC DENISE SCHAEFFER aka NUNN (DOB 01/28/1978), DEFENDANT SCHAEFFER herein, and a male suspect, stole merchandise from the store on 12/5/2020. J.L. advised that DEFENDANT SCHAEFFER and the male selected bedding merchandise totaling \$1,156.89, and exited the store, passing all points of sale without offering payment. DEFENDANT SCHAEFFER and the male loaded the items into a vehicle and left the lot. Police viewed and obtained video surveillance of the incident.

On December 12, 2020, while en route to the same Target for another reported shoplifting, dispatch aired that DEFENDANT had walked out of Target with bedding merchandise without offering payment. DEFENDANT was described as wearing a black jacket, black beanie, black shoes, and a black backpack. Police located DEFENDANT sitting at a bus stop near Target. DEFENDANT could not provide police with proof of purchase. DEFENDANT told police, "yeah, I stole some shit." DEFENDANT admitted she was going to sell the comforters for cash. Police viewed and obtained video surveillance from the incident. Surveillance showed DEFENDANT bypass all checkout lanes without attempting to pay for the merchandise. The total loss from this incident was \$249.97.

The total aggregated loss from the two theft incidents on 12/5/2020 and 12/12/2020 was \$1,406.86.

DEFENDANT SCHAEFFER was identified by law enforcement and Target employees familiar with her.

DEFENDANT is out of custody.

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

Amanda Johnson
Police Officer
6700 Portland Avenue S
Richfield, MN 55423
Badge: 186

Electronically Signed:
01/28/2021 02:26 PM
Hennepin County, MN

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

Prosecuting Attorney

Mehek Masood
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
01/28/2021 02:23 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 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: \$0.00

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: January 28, 2021.

Judicial Officer

Luis Bartolomei
District Court Judge

Electronically Signed: 01/28/2021 03:43 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.

ANGELIC DENISE NUNN

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:

DEFENDANT FACT SHEET

Name: ANGELIC DENISE NUNN
DOB: 01/28/1978
Address: 740 E 17th St
Minneapolis, MN 55404
Alias Names/DOB: ANGELIC DENISE SCHAEFFER DOB: 1/28/1978
ANGELIC DENISE SCHAEFER DOB: 1/28/1978
SID:
Height:
Weight:
Eye Color:
Hair Color:
Gender: FEMALE
Race: Black
Fingerprints Required per Statute: Yes
Fingerprint match to Criminal History Record: No
Driver's License #:
SILS Person ID #: 346774
SILS Tracking No. 3206346
Alcohol Concentration:

MINNESOTA
JUDICIAL
BRANCH

STATUTE AND OFFENSE GRID

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	12/5/2020	609.52.2(a)(1) Theft-Take/Use/Transfer Movable Prop-No Consent	Felony	U128H		MN0271800	20004112
	Penalty	12/5/2020	609.52.3(3)(a) Theft - Value of property or services \$1001 - \$5,000	Felony	U128H		MN0271800	20004112



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