

State of Minnesota  
County of Dakota

District Court  
1st Judicial District

Prosecutor File No.  
Court File No.

CA-2016-00794

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State of Minnesota,

Plaintiff,

**COMPLAINT**

Warrant

vs.

**BRANDON LEE HAWLEY DOB: 09/20/1979**

2445 Acorn Run  
Victoria, MN 55386

Defendant.

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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): 07/01/2015 to 10/31/2015

Control #(ICR#): 15001539

Charge Description: On or about July 1, 2015 - October 31, 2015, in the County of Dakota, Minnesota, BRANDON LEE HAWLEY, 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.

**COUNT II**

**Charge: Identity Theft (Over \$2,500 or 4-7 Direct Victims) (Aggregating)**

Minnesota Statute: 609.527.2, with reference to: 609.527.3(4), 609.52.3(2)  
Maximum Sentence: 0-10 Years and/or \$6,000.00 - \$20,000.00  
Offense Level: Felony

Offense Date (on or about): 08/01/2015 to 10/01/2015

Control #(ICR#): 15001539

Charge Description: On or about August 1, 2015 - October 1, 2015, in the County of Dakota, Minnesota, BRANDON LEE HAWLEY, did transfer, possess, or use an identity that is not the person's own, with the intent to commit, aid, or abet any unlawful activity, and the offense involves more than three but not more than seven direct victims, or the aggregate total combined loss to the direct and indirect victims is more than \$2,500.

## STATEMENT OF PROBABLE CAUSE

In October of 2015, the Minnesota Commerce Fraud Bureau was contacted by A.C., a resident of West Saint Paul, Dakota County, who reported having been swindled out of a large amount of money.

AC had met an individual on Tinder in June of 2015, who identified himself as Brandon Joseph Cooltons to AC. It was not until October of 2015 that AC learned his real name was BRANDON LEE HAWLEY, the defendant. On 7/21/15, AC loaned HAWLEY (aka Cooltons) \$2500 that he claimed to need to go to a funeral, a promissory note was signed. HAWLEY gave AC a check to pay back \$2000 of the funds on 9/9/15 of 2015, however that check turned out to be counterfeit and was not honored by the bank.

In late July, HAWLEY asked AC if she would be his partner in a business selling custom golf carts 50/50. HAWLEY presented AC with a business plan, articles of organization and bylaws for the "Business"; all using his aka Cooltons. HAWLEY talked AC into using her personal credit to purchase things for the "business". HAWLEY put AC in touch with two of his associates named: Bradley Wasold and Timothy Schumann. Additional investigation revealed that both of these individuals are in fact HAWLEY. AC did not have the cash available to buy into the business, so HAWLEY (in person and acting through his fake personas) convinced AC to purchase a boat on credit and give it to him as her buy in to the business. AC financed a boat with a total cost of \$60,589.20 and gave it to HAWLEY. AC knew she would have difficulty applying for the loan for the boat, so HAWLEY created documents for AC to use in applying for the loan that showed she made more money than she did.

In August of 2015, HAWLEY convinced AC to apply for a personal loan in the amount of \$20,000 from a bank in Eagan. HAWLEY told AC that the money was for business space they would be leasing. Again AC did not have the correct documentation to qualify for a loan. She watched HAWLEY make fake documents for her to use to qualify for the loan at a nearby Starbucks. Those documents were submitted by email to the bank. HAWLEY had AC issue \$18,900 of those funds as a cashier's check made payable to MI. HAWLEY told AC that MI was the landlord for the business space they were leasing. However additional investigation reveals that MI is the owner of the home HAWLEY was residing in and the cashier's check was given to MI to pay for back rent owed on the home. HAWLEY continued to have AC purchase items with her personal credit cards, promising that the business would pay her back. AC never received any funds back. In total HAWLEY convinced AC to provide him with approximately \$46,000 in funds from her bank between July and September of 2015 for the "Business".

HAWLEY also convinced AC to get a credit card in his name on her account for "business" expenses. HAWLEY used the card and charged approximately \$26,800 between July and September of 2015. HAWLEY also convinced AC to put an additional \$9000 in charges on another credit card, but telling her she would be reimbursed by the "business".

After speaking with the agents from Commerce, AC discovered that HAWLEY had opened credit accounts with Super America and Lowes without her permission, both of these accounts were opened using HAWLEY's home address and email address, but using AC's name and date of birth. The total amount charged to these two accounts was approximately \$7200 between August and September of 2015.

Once AC realized she was being swindled, she confronted HAWLEY, and he prepared a settlement agreement which he presented to her, in an attempt to indemnify himself from claims of wrongdoing. However, when HALWEY learned that law enforcement had been contacted he ceased all contact.

Additional investigation showed that other than a few paper filings with the State of Minnesota, no "business" exists nor is there evidence that any of the funds taken by HAWLEY were used to further the non-existent business. Agents also reviewed a large number of emails between HAWLEY and AC.

A review of the records shows that HAWLEY currently has three felony warrants out for his arrest; two in Carver County and one in Hennepin County.

## 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.

<b>Complainant</b>	Sheila Owen 85 7th Place East Suite 500 St. Paul, MN 55101	Electronically Signed: 06/23/2016 11:03 AM Ramsey County, Minnesota
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Being authorized to prosecute the offenses charged, I approve this complaint.

<b>Prosecuting Attorney</b>	Dain L Olson Assistant Dakota County Attorney 1560 Hwy 55 Hastings, MN 55033-2392 (651) 438-4438	Electronically Signed: 05/19/2016 04:14 PM
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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 on \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ AM/PM before the above-named court at 1560 W Highway 55 Dakota County Judicial Center, Hastings, MN 55033 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: \_\_\_\_\_, \_\_\_\_\_.

Judicial Officer <judge name>

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

COUNTY OF DAKOTA  
STATE OF MINNESOTA

**State of Minnesota**

Plaintiff  
vs.

**Brandon Lee Hawley**

Defendant

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

Signature of Authorized Service Agent:

## DEFENDANT FACT SHEET

**Name:** Brandon Lee Hawley  
**DOB:** 09/20/1979  
**Address:** 2445 Acorn Run  
Victoria, MN 55386

**Alias Names/DOB:** Brandon Cooltons DOB:  
**SID:**  
**Height:**  
**Weight:**  
**Eye Color:**  
**Hair Color:**  
**Gender:** MALE  
**Race:** Unknown  
**Fingerprints Required per Statute:** Yes  
**Fingerprint match to Criminal History Record:** No  
**Handgun Permit:** No  
**Driver's License #:**  
**Alcohol Concentration:**

## 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	7/1/2015	609.52.2(a)(4) Theft-By Swindle	Felony	U1069		MN062095Y	15001539
	Penalty	7/1/2015	609.52.3(1) Theft-Firearm or Property Value Over \$35,000	Felony	U1069		MN062095Y	15001539
2	Charge	8/1/2015	609.527.2 Identity Theft-Transfers/Possesses/Uses Identity of Other Person	Felony	U1732		MN062095Y	15001539
	Penalty	8/1/2015	609.52.3(2) Theft-Value over \$5,000 or Trade Secret, Explosive, Controlled Substance I or II	Felony	U1732		MN062095Y	15001539
	Penalty	8/1/2015	609.527.3(4) Identity Theft-Penalties-3 But Not More Than 7 Direct Victims/Value More Than \$2,500	Felony	U1732		MN062095Y	15001539