
State of Minnesota,

Plaintiff,

vs.

JADE MICHAEL SALMONSON DOB: 08/31/1971

29844 - 152nd St NW
Zimmerman, MN 55398

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(4), with reference to: 609.52.3(2)

Maximum Sentence: 10 Years Imprisonment and/or \$20,000 Fine

Offense Level: Felony

Offense Date (on or about): 07/30/2012 to 11/29/2012

Control #(ICR#): 12001292

Charge Description: That on or about 7/30/2012 to 11/29/2012, in Sherburne County, Minnesota, the defendant, Jade Michael Salmonson, DOB: 8/31/1971 (43), by swindle whether by artifice, trick, device or other means, obtained property or services from another person, and the value of the property or services stolen exceeds \$5,000, or if the property stolen was an article representing a trade secret, an explosive or incendiary device, or a controlled substance listed in schedule I or II pursuant to section 152.02 with the exception of marijuana.

COUNT II

Charge: Insurance Fraud-Present False Representation/Conceals Facts-Claim for Payment

Minnesota Statute: 609.611.1(a)(2), with reference to: 609.52.3(2)

Maximum Sentence: 10 years Imprisonment and/or \$20,000 fine

Offense Level: Felony

Offense Date (on or about): 07/30/2012 to 11/29/2012

Control #(ICR#): 12001292

Charge Description: That on or about 7/30/2012 to 11/29/2012, in Sherburne County, Minnesota, the defendant, Jade Michael Salmonson, DOB: 8/31/1971 (43), did with the intent to defraud for the purpose of depriving another of property or for pecuniary gain, committed, or permitted its employees or its agents to present, cause to be presented, or prepared with knowledge or reason to believe that it will be presented, by or on behalf of an insured, claimant, or applicant to an insurer, insurance professional, or premium finance company in connection with an insurance transaction or premium finance transaction, any information that contained a false representation as to any material fact, or that concealed a material

fact concerning a claim for payment or benefit under an insurance policy, and the value of the property or services stolen exceeds \$5,000, or if the property stolen was an article representing a trade secret, an explosive or incendiary device, or a controlled substance listed in schedule I or II pursuant to section 152.02 with the exception of marijuana.

STATEMENT OF PROBABLE CAUSE

Your Complainant is an officer with the Minnesota Department of Commerce Fraud Bureau. In this capacity your Complainant believes the following to be true and correct.

On July 30, 2012 continuing through November 29, 2012, Jade Michael Salmonson, DOB 08/31/71, hereinafter referred to as the defendant, submitted a claim to American Security Insurance Company, also known as Assurant, stating that his roof, siding and windows on his home at 29844 152nd St. NW in the city of Zimmerman, Sherburne County, were damaged in a storm on May 1, 2012. The defendant was issued checks in the amount of \$9214.07 and \$12,111.95 to have the damage repaired. The company that repaired the roof, Kiser Construction, noted that the roof and the siding was more than 20 years old. On November 12, 2014, the defendant represented to an American Security Insurance Company employee that he had never previously made a claim for damage to his roof and siding since he moved into the home in 2005.

Investigation revealed that in September of 2007, the defendant submitted a claim to State Farm Insurance for damage to siding and roof from a storm on September 12, 2007. On September 25, 2007, State Farm issued checks in the amount of \$8,727.68, \$2,125.45, and \$170.40 to repair the damage.

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	Brandon Johnson Supervisory Special Agent 85 7th Place East Suite 500 St. Paul, MN 55101 Badge: 102	Electronically Signed: 08/27/2015 07:44 AM
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Subscribed and sworn to before the undersigned.

Notary Public or Judicial Official	Leslie Milan Analyst, County of Ramsey 85 7th Place East Suite 500 St. Paul, MN 55101 Notary ID: 31000914	Commission expires: 01/31/2020 Electronically Signed: 08/27/2015 08:05 AM
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Being authorized to prosecute the offenses charged, I approve this complaint.

Prosecuting Attorney	Leah G Emmans Assistant Sherburne County Attorney 13880 Business Center Drive Elk River, MN 55330-4601 (763) 765-4725	Electronically Signed: 08/26/2015 04:02 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 13880 Business Center Drive, Elk River, MN 55330-1692 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 is issued by the undersigned Judge as of the following date: _____, _____.

Judicial Officer <judge name>

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

**COUNTY OF SHERBURNE
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Jade Michael Salmonson

Defendant

Clerk's Signature or File Stamp:

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: