



STATE OF MINNESOTA
COUNTY OF RAMSEY

DISTRICT COURT
SECOND JUDICIAL DISTRICT

COURT FILE NO.: _____
PROSECUTOR FILE NO.: 2138468

State of Minnesota,

Plaintiff,

v.
Natasha Howard
(DOB: 09/12/1978)
1591 Germain Landing
St. Paul, MN 55106,

**FELONY
CRIMINAL COMPLAINT**
 Summons Warrant
 Order of Detention

 Amended
 Certified Juvenile
 EJJ

Defendant.

The Complainant, being duly sworn, makes complaint to the above-named Court and states that there is probable cause to believe that the Defendant committed the following offense(s):

COUNT 1

On or about the 10th day of April, 2015, in Ramsey County, Minnesota, the defendant, **NATASHA HOWARD**, did unlawfully and with intent to defraud, falsely make or alter a writing or object so that it purports to have been made by another or by the maker or alterer under an assumed or fictitious name, or at another time, or with different provisions, or by authority of one who did not give such authority, which writing or object whereby, when genuine, legal rights, privileges, or obligations are created, terminated, transferred, or evidenced, or a writing normally relied upon as evidence of debt or property rights.

Said acts constituting the offense of **Aggravated Forgery of Document** in violation of MN Statute: §609.625.1(1)
Maximum Sentence: 10 years or \$20,000 fine, or both.

COUNT 2

On or about the 5th day of May, 2015, in Ramsey County, Minnesota, the defendant, **NATASHA HOWARD**, did unlawfully and with intent to defraud, falsely make or alter a writing or object so that it purports to have been made by another or by the maker or alterer under an assumed or fictitious name, or at another time, or with different provisions, or by authority of one who did not give such authority, which writing or object whereby, when genuine, legal rights, privileges, or obligations are created, terminated, transferred, or evidenced, or a writing normally relied upon as evidence of debt or property rights.



Said acts constituting the offense of **Aggravated Forgery of Document** in violation of MN Statute:

§609.625.1(1)

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



STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Your complainant is a sworn peace officer and Special Agent with the Commerce Fraud Bureau of the Minnesota Department of Commerce and bases this complaint on witness interviews, insurance reports and his own investigation:

On April 22, 2015, special agents from the Department of Commerce – Fraud Bureau met with supervisors at the City of St. Paul Department of Safety and Inspections after receiving a tip that one of its employees, **NATASHA HOWARD (D.O.B. 9/12/1978)**, may be selling false insurance documents from the City of St. Paul Department of Safety and Inspections, located at 375 Jackson Street, St. Paul, Ramsey County.

HOWARD worked as a customer service specialist, meaning that her job was to assist customers at the front counter in obtaining permits and licenses. Her coworkers became suspicious when people would ask for HOWARD by name or stand in a longer line just to see HOWARD. At least one coworker had witnessed HOWARD speak with people on different occasions in the office lobby and then meet them near the lobby elevator where she exchanged what appeared to be an insurance card for cash.

Based on this information, HOWARD's supervisor examined HOWARD's trash can at the end of the work day on March 26, 2015 after HOWARD had left for the day. The supervisor discovered several pieces of torn-up paper containing names, descriptions of cars and the cars' vehicle identification numbers ("VINs"). The supervisor also noted that HOWARD kept a box of card stock paper next to her desk, although HOWARD's job did not require the use of such paper. The supervisor photographed these items and provided the photographs to this investigator.

On April 10, 2015, HOWARD and another coworker tried to print documents to a shared printer at the same time. The coworker's print job ended up being printed to card stock that HOWARD had fed into the printer, and HOWARD refused to give the coworker the card stock. HOWARD's supervisor again examined HOWARD's garbage at the end of a work day and discovered post-it notes with a person's name, address, car description and VIN. The supervisor also discovered card stock among HOWARD's papers. One side of the card stock contained a coworker's print job dated April 10, 2015 at 4:33 PM, and the other side contained insurance information purporting to be from Meridian Security Insurance Company for R.D.K.

Further investigation revealed that R.D.K. had had her 2002 Chevy Impala towed on April 9, 2015. On April 10, 2015 at 9:51 PM, R.D.K. provided a copy of her driver's license and an insurance card purporting to be from Meridian Security Insurance Company to the tow company in order to retrieve her Impala. This was an exact copy of the insurance card found among the defendant's papers by her supervisor.

This investigator spoke with representatives from State Auto Insurance Company on April 29, 2015, which bought out Meridian Security Insurance Company approximately five years ago. Their records indicate that they have never insured R.D.K., the policy number contained on the card used by R.D.K. was not a valid policy number, and the defendant has never been authorized to sell policies for State Auto Insurance Company or Meridian Security Insurance Company.

Based on the information gathered during the investigation, a Special Agent with the Commerce Fraud Bureau contacted the defendant and posed as someone trying to purchase a false insurance card. The undercover agent met with the defendant at her place of employment on the afternoon of May 5, 2015. HOWARD agreed to



provide the false insurance card to the undercover agent in exchange for \$60. After the agent gave her the money and received the false insurance card purporting to be from Meridian Security Insurance Company, other agents from the Commerce Fraud Bureau met with the defendant in a conference room and placed her under arrest. During a search incident to arrest, agents recovered the \$60 from the defendant's bra. This entire transaction was captured by a hidden video camera carried by the undercover agent.

After being arrested and advised of her rights, the defendant made a lengthy statement to this agent wherein she denied any wrongdoing or ever providing anyone with false insurance documents. At the time of the statement, HOWARD had not been told that the person she had just sold a fake insurance card to was an undercover peace officer.



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'S NAME:

COMPLAINANT'S SIGNATURE:

Scott Wilson

Subscribed and sworn to before the undersigned this 6 day of May, 2015.

NAME/TITLE:

SIGNATURE:

Joseph H. Boche peace officer

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

Date: 05/06/2015

PROSECUTING ATTORNEY'S SIGNATURE:

Name: John Ristad
Assistant Ramsey County Attorney
345 Wabasha Street North, Suite 120
St. Paul, MN 55102
651-266-3222/jh
Attorney Registration #387580



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.

SUMMONS

THEREFORE YOU, THE ABOVE-NAMED DEFENDANT, ARE HEREBY SUMMONED to appear on the ____ day of _____, 20__ at _____ before the above-named court at _____ to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

WARRANT

Execute in MN Only *Execute Nationwide* *Execute in Border States*

To the Sheriff of the above-named county; or other person authorized to execute this warrant: I hereby order, in the name of the State of Minnesota, that the above-named Defendant be apprehended and arrested without delay and brought promptly before the above-named 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.

ORDER OF DETENTION

Since the above-named Defendant is already in custody, I hereby order, subject to bail or conditions of release, that the above-named Defendant continue to be detained pending further proceedings.

Bail: \$10,000.00

Conditions of Release:

This complaint, duly subscribed and sworn to, is issued by the undersigned Judicial Officer this ____ day of _____, 20__.

JUDICIAL OFFICER: **JENNIFER L. FRISCH**
NAME: Judge of District Court
TITLE: **MAY - 6 2015**

SIGNATURE:

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

COUNTY OF RAMSEY
STATE OF MINNESOTA

STATE OF MINNESOTA
vs.

NATASHA HOWARD

Plaintiff,

Defendant.

Clerk's Signature or File Stamp:

RETURN OF SERVICE
I hereby Certify and Return that I have served a copy of this COMPLAINT upon the Defendant herein named.

Signature of Authorized Service Agent:



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.

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JUDICIAL OFFICER:
NAME:
TITLE:

SIGNATURE:

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

COUNTY OF RAMSEY STATE OF MINNESOTA STATE OF MINNESOTA vs. NATASHA HOWARD	<p style="text-align: center;"><i>Clerk's Signature or File Stamp:</i></p> <p style="text-align: center;"><i>RETURN OF SERVICE</i></p> <p style="text-align: center;"><i>I hereby Certify and Return that I have served a copy of this COMPLAINT upon the Defendant herein named.</i></p> <p style="text-align: center;">Signature of Authorized Service Agent:</p>
Plaintiff, Defendant.	



FINDINGS OF FACT

Probable cause found that defendant committed the offenses charged.

Ordered defendant's motion to dismiss denied.

Plea of not guilty to all counts entered.

Trial and hearing on all issues set.

Dated: _____

JUDGE OF DISTRICT COURT



DEFENDANT DATA / CHARGE SHEET – ATTACHMENT A

DEFENDANT NAME: NATASHA HOWARD		DOB: 09/12/1978
Defendant alias name(s):		Alias DOB(s):
Defendant last known address:	1591 Germain Landing St. Paul, MN 55106	
State ID:		
Fingerprint ID:		
FBI ID:		
St. Paul PD ID:		
Offender ID:		

OTHER DEFENDANT / CASE IDENTIFIERS:		
Fingerprinted?	<input type="checkbox"/> No	<input type="checkbox"/> Yes
Handgun permit?	<input type="checkbox"/> No	<input type="checkbox"/> Yes (Issuing Agency:)
Location of violation:		
IF DRIVING OFFENSE:		
Driver's License	Number:	Issuing State:
License Plate	Number:	Issuing State:
Accident Type:	<input type="checkbox"/> No injury/no damage	<input type="checkbox"/> Property Damage
<i>check all that apply</i>	<input type="checkbox"/> Personal Injury	<input type="checkbox"/> Fatality
Blood Alcohol Concentration (BAC):		



FELONY WARRANT AND ORDER OF DETENTION COMPLAINT

CT NO	OFFENSE DATE	STATUTE TYPE	STATUTE NBR	STATUTE DESCRIPTION	OFFENSE LEVEL	MOC	G O C	AGENCY ORI CN NBR FUNCTION
1	04/10/2015	Charge	609.625.1(1)	Aggravated Forgery-Legal Rights Created/Terminated	F	C1130	N	MN Dept. of Commerce ORI - MN062095Y CN - 1500576 Charging
2	05/05/2015	Charge	609.625.1(1)	Aggravated Forgery-Legal Rights Created/Terminated	F	C1130	N	MN Dept. of Commerce ORI - MN062095Y CN - 1500576 Charging



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Scott Wilson

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PROSECUTING ATTORNEY'S SIGNATURE:

Name: John Ristad
Assistant Ramsey County Attorney
345 Wabasha Street North, Suite 120
St. Paul, MN 55102
651-266-3222/jh
Attorney Registration #387580