

CCT LIST CHARGE STATUTE ONLY

M.O.C.

GOC

CTY. ATTY.

CONTROLLING

CONTROL NO.

I. MSS 609.745, subd. 1(c)

N2080

FILE NO. 027-2500

AGENCY

07002008

II. MSS 609.72, subd. 1(3)

M3030

COURT CASE NO.

DATE FILED

07 JUL -2 PM 3:56

Amended

Tab Charge Previously Filed

✓ If more than 6 counts (see attached)

✓ If domestic assault as defined by MS 518B.01, subd. 5

## State of Minnesota

VS.

PLAINTIFF.

SERIOUS FELONY

SUMMONS

FELONY

WARRANT

GROSS MISDM DWI

ORDER OF DETENTION

GROSS MISDM

Date of Birth

SJS COMPLAINT NUMBER

NAME: first, middle, last

LARRY EDWIN CRAIG

WASHINGTON DC 20025

DEFENDANT.

M.A.C.

DLN #.

PLATE #.

## COMPLAINT

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). The complainant states that the following facts establish PROBABLE CAUSE:

Your Complainant is a Sergeant with the Metropolitan Airports Commission Police Department who alleges the following:

On June 11, 2007, at approximately 12:00 p.m., Sergeant Karsnia entered the main men's public restroom of the North Star Crossing in the Lindbergh Terminal, at the Minneapolis-St. Paul International Airport, County of Hennepin, State of Minnesota. Sergeant Karsnia was in plain clothes for the purpose of investigating allegations of sexual conduct in the public bathroom. Sergeant Karsnia observed that there were numerous persons in the bathroom appearing to use the bathroom for its intended purposes and some but not all, of the bathroom stalls were occupied. Sergeant Karsnia entered an unoccupied bathroom stall at the back of the restroom, the third stall from the back wall. Sergeant Karsnia observed the shoes and ankles of unidentified people in each of the bathroom stalls adjacent to his.

At approximately 12:13 p.m., Sergeant Karsnia observed an older white male, later identified as the above-named Defendant, standing outside of the stall occupied by Sergeant Karsnia. Sergeant Karsnia observed the Defendant look through the crack between the stall door and its frame into the stall that Sergeant Karsnia was occupying. Sergeant Karsnia observed the Defendant appear to look at his own fidgeting fingers and then return again to gazing into the stall of Sergeant Karsnia through the crack. Sergeant Karsnia observed the Defendant repeat this conduct in the same pattern for approximately two minutes. The Defendant peered long enough that Sergeant Karsnia was able to observe that the Defendant had blue eyes.

At approximately 12:15 p.m. Sergeant Karsnia observed that the individual occupying the stall to the left of Sergeant Karsnia flushed the toilet and exited the stall. Sergeant Karsnia observed the Defendant enter the stall and could see that the Defendant had placed his roller bag against the front of the stall door, which Sergeant Karsnia's experience has indicated is used to attempt to conceal sexual conduct by blocking the view from the front of the stall. Sergeant Karsnia observed the Defendant's shoes and ankles. Sergeant Karsnia observed the Defendant tap his right foot, which Sergeant Karsnia recognized as a signal often used by persons communicating a desire to engage in sexual conduct. Sergeant Karsnia observed the Defendant tap his foot several more times and move his foot closer to the stall occupied by Sergeant Karsnia. Sergeant Karsnia moved his own foot up and down slowly. Sergeant Karsnia observed the Defendant move his right foot so that it touched Sergeant Karsnia's left foot, at which point the Defendant's foot was

THEREFORE, Complainant requests that said 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:

Sergeant David Karsnia

COMPLAINANT'S SIGNATURE:

Being duly authorized to prosecute the offense(s) charged, I hereby approve this Complaint.

PROSECUTING ATTORNEY'S SIGNATURE:

DATE:

PROSECUTING ATTORNEY:

NAME TITLE:

ADDRESS/TELEPHONE:

Christopher P. Renz, 3300 Edinborough Way, Suite 600, Edina, MN 55435 (952)835-7000

FORM B

Rev. 12/95

within the stall area of the stall occupied by Sergeant Karsnia. Sergeant Karsnia could hear other people using the restroom and observed that the bathroom stall to his right was occupied.

Sergeant Karsnia then observed the Defendant swipe his hand under the stall divider for a few seconds, swiping from the front of the stall back towards the back wall, which was done with the Defendant's hand palm-up and guiding it along the stall divider. Sergeant Karsnia observed the Defendant again swipe his hand in the same motion and manner. Sergeant Karsnia observed the Defendant make the same motion for a third time. Sergeant Karsnia observed that it was the Defendant's left hand due to the Defendant's thumb position. Sergeant Karsnia also observed a gold ring on the Defendant's ring finger.

At approximately 12:19 p.m., Sergeant Karsnia showed the Defendant his police identification under the stall and pointed towards the exit, at which time the Defendant exclaimed "No!" Sergeant Karsnia again pointed to the exit. Sergeant Karsnia observed the Defendant exit the stall with his bag and without flushing the toilet. Sergeant Karsnia observed that not all of the stalls were occupied.

### OFFENSE

Based on the above, Complainant alleges that on June 11, 2007, at the Minneapolis-St. Paul International Airport, County of Hennepin, State of Minnesota, Larry E. Craig, then and there being, violated the provisions of:

COUNT I      **PEEP:** Interference with Privacy: Minn. Stat. Sec. 609.746, subd. 1(c), by surreptitiously gazing, staring, or peeping in the window or other aperture of a sleeping room in a hotel, as defined in section 327.70, subd. 3; a tanning booth, or other place where a reasonable person would have an expectation of privacy and has exposed or is likely to expose their intimate parts, as defined in section 609.341, subd. 5, or the clothing covering the immediate area of the intimate parts and doing so with the intent to intrude upon or interfere with the privacy of the occupant; a Gross Misdemeanor.

COUNT II      **DISOR:** Disorderly Conduct: Minn. Stat. Sec. 609.72, subd. 1(3), by engaging in offensive, obscene, abusive, boisterous, or noisy conduct or in offensive, obscene, or abusive language tending reasonably to arouse alarm, anger or resentment in others, in a public or private place, knowing, or having reasonable grounds to know that it will, or will tend to, alarm, anger or disturb others or provoke an assault or breach of the peace, a Misdemeanor.



This COMPLAINT was subscribed and sworn to before the undersigned this \_\_\_\_\_ day of \_\_\_\_\_

NAME:

SIGNATURE:

TITLE:

**FINDING OF PROBABLE CAUSE**

From the above sworn facts, 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. The Defendant (s) is/are thereof charged with the above-stated offense.

**SUMMONS**

**X** THEREFORE You, THE ABOVE-NAMED DEFENDANT(S), ARE HEREBY SUMMONED to appear on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ AM/PM 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 MINNESOTA ONLY**

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 (s) 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 thereafter as such Judge or Judicial Officer is available) to be dealt with according to law.

**ORDER OF DETENTION**

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

Bail:

Conditions of Release:

This COMPLAINT - SUMMONS, WARRANT, ORDER OF DETENTION, duly subscribed and sworn to, is issued by the undersigned Judicial Officer this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

NAME:

SIGNATURE:

TITLE:

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

STATE OF MINNESOTA COUNTY of \_\_\_\_\_

Hennepin

**State of Minnesota**

Plaintiff

vs.

Larry Edwin Craig

Defendant (s)

Clerk's Signature or File Stamp:

**RETURN OF SERVICE**

I hereby Certify and Return that I have served a copy of this COMPLAINT - SUMMONS, WARRANT, ORDER OF DETENTION upon the Defendant (s) herein-named.

Signature of Authorized Service Agent: