

State of Minnesota  
County of Waseca

District Court  
3rd Judicial District

Prosecutor File No. 18CR00442  
Court File No. 81-CR-18-816

**State of Minnesota,**

Plaintiff,

vs.

**RACHELLE LYNN SCHOKNECHT DOB: 11/08/1970**

1517 Marsh Street  
Mankato, MN 56001

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(a)(4), with reference to: 609.52.3(3)(a)

Maximum Sentence: Five Years, \$10,000 fine, or both

Offense Level: Felony

Offense Date (on or about): 09/07/2018

Control #(ICR#): 18006325

Charge Description: On or about August 14, 2018 through September 7, 2018, in the City and County of Waseca, defendant swindled, whether by artifice, trick, device or any other means, and obtained property or services from another person, to-wit: defendant refused to give Waseca Hockey Association funds obtained from pull tab sales belonging to Waseca Hockey Association totaling \$6,263.96.

**STATEMENT OF PROBABLE CAUSE**

Your Complainant is Kris Markeson, Captain of the Waseca Police Department. In that capacity, Complainant has read the reports of Officer Arik Matson and Officer Nicholas Wellman and believes the following to be true and correct.

On September 7, 2018, Officer Matson received a call from Josh Lynch. Josh explained that he serves on the Waseca Hockey Association board. Josh explained that they have contracted with Nashville Saloon, 108 South State Street in the City and County of Waseca, as an establishment where they are offering pull tabs and e-tabs gambling to help generate funds for the Waseca Hockey Association. He stated that he has been communicating with one of the owners at Nashville Saloon, Rachelle Schoknecht. Josh said that he has been trying to access the funds and audit them to ensure the numbers are correct and the funds are secure. Josh said that Rachelle claims funds for the Waseca Hockey Association is secured in a safe and the lock is currently non-operational and cannot be accessed. Josh said that Rachelle has been working on getting a locksmith for more than a few days and is worried the money has been stolen or misappropriated.

Josh asked if the Waseca Police Department could be present when they remove the remaining pull tabs, 2 boxes, and tablets that offer e-tabs. Josh and other members of the Waseca Hockey Association removed 2 boxes of pull tabs, the audit logs, and all of the tablets that offered e-tabs for gambling. Josh explained that they will do a complete audit of the proceeds and get a final number on what dollar amount should be in the safe. Josh pointed out just looking at the logs, they were not documented properly. Josh also wanted it noted that the start-up money that should be in the bottom drawer of each pull tab box was missing. Josh also informed Rachelle, that the hockey association was not paying Nashville Saloon the fee's for having the boxes at their establishment until their funds were received.

Officer Wellman and Officer Matson spoke to both Rachelle and John Schoknecht, owners and part of a group of owners. Rachelle has been the main contact with the Waseca Hockey Association. Officer Wellman and Officer Matson explained that the membership from the Waseca Hockey Association just wants to ensure the funds are secure and want access to the safe that Rachelle is claiming the funds are locked in. Rachelle told officers that the money for the hockey association is in the safe and that somehow the key she uses broke off in the lock and the locksmith who can open it has been unavailable until next week. Officer Wellman and Officer Matson asked to see the safe that is not accessible due to the broken key lock. Rachelle and John walked us to a near the back of the bar. Rachelle stated the upright safe in the corner is the one that has a portion of her key broken off in the lock. The safe is roughly 4 feet tall and has a digital keypad and barrel lock on the front of the safe. Officer Matson touched the digital keypad and confirmed the keypad was still operational. Rachelle said that both the keypad and the lock need to be unlocked in order to access the inside of the safe. Rachelle said that once she gets a total as to how much is missing from the Waseca Hockey Association gambling proceeds, she will have that amount of cash ready for them to pick up. Rachelle said that John could go to Madison Lake, MN and talk to his boss to get money to pay the Hockey Association back. Rachelle wants the matter solved and stated she will pay them back in full.

Josh Lynch offered to call an alternate locksmith and even offered to pay the alternate locksmith for their services. Rachelle stated she did not want this done and that she would have access to the safe next week and get the funds out of the safe for the Waseca Hockey Association to retain.

On September 13, 2018, Officer Matson received an email from Josh Lynch, advising that the total missing was \$6,263.96. Starting cash banks on site \$4800.00; Missing Etab deposit for the month of August 2018 of \$817.96; Box 1 behind the bar had a final audit of \$256 profit from game Crazy 8's serial number 8145446; Box 2 behind the bar had a final audit of \$390 profit from game Big Dog serial number 5273266. These boxes started on August 14, 2018.

On September 13, 2018, Officer Wellman and Officer Matson returned to Nashville Saloon to speak to Rachelle Schoknecht. Rachelle stated that the safe lock had been fixed on September 11, 2018 and was now operational. Rachelle stated that she had just received a text from Josh Lynch regarding the audit and the total amount of money that is missing from the pull tabs and e-tabs proceeds. Rachelle stated the total amount missing after the audit is \$6263.96. Rachelle stated that the amount in the safe and the amount alleged by the hockey association is roughly \$2100.00 different. Officer Matson confirmed with Rachelle that there was roughly \$4000.00 in the safe, she stated this was correct. Rachelle said she told Josh she intends to get all of the money back to the Waseca Hockey Association before the end of September. Rachelle claimed former employees had been stealing money. On September 13, 2018, Officer Wellman met with Jeanne Hanson, another member of the Waseca Hockey Association, and attempted to collect the money from Rachelle, who told them she now gave all the money to their lawyer to build a civil case against the employees. Rachelle claimed to be using Farrish Johnson law firm in Mankato. None of the alleged employee thefts were ever reported to the Waseca Police Department.

On September 14, 2018, Officer Matson spoke again with Rachelle if she had any bill for the locksmith to confirm that they were there on September 11, 2018 to fix the safe. Rachelle stated that she did not receive any bill. She said that the locksmith used a small tweezers to fix the lock, and did not charge her for his locksmith services. Rachelle said that he just had a beer at the bar and did not charge her.

On September 14, 2018, Officer Matson spoke to Staci Laffrey, a former Nashville Saloon employee. Staci is one of the former employees that Rachelle claiming took some of the missing gambling funds that belong to the Waseca Hockey Association. Ms. Laffrey worked at Nashville Saloon for roughly six months and ended her employment mid-August, 2018. Ms. Laffrey said that when she used to work nights and business would slow down, Rachelle would tell Ms. Laffrey to just leave and that she would close out her till and count the boxes out for the night. Ms. Laffrey said she was in the safe maybe twice in the six months she worked there. Ms. Laffrey made the statement that Rachelle, and maybe John, were the only people who accessed the safe. Officer Matson again asked Ms. Laffrey about her access to the safe where the gambling funds are supposedly secured. Ms. Laffrey said she never knew the code, Rachelle would tell her the code, and then she would access it in front of her only. Staci again stated that the business does not use the safe. Ms. Laffrey further advised that one night she went into Nashville with her boyfriend, and there was a band playing. Staci said Rachelle stated she was unsure what she was going to do because she did not have money to pay the band. Staci said Rachelle followed up by saying "I guess I will take it out of the pull tab money." Staci said she is unsure if Rachelle did this, but this is what she stated. She was not able to recall the date or band name, just said that she knew it was an expensive band.

On September 17, 2018, Officer Wellman spoke with Jeanne Hansen. Ms. Hansen informed him that she called Farrish Johnson Law Office in Mankato and spoke with Paul Moosbrugger, an attorney with the firm. Jeanne recorded her conversation with Mr. Moosbrugger, who advised that he did discuss representation with Rachelle, but had not received a retainer, does not represent Rachelle, nor did she drop any money off at their office.

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 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, subs. 1, 2.

**Complainant**

Kris Markeson  
 Captain  
 303 South State Street  
 Waseca, MN 56093  
 Badge: 237

Electronically Signed:  
 10/10/2018 08:39 AM  
 Waseca County, Minnesota

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

**Prosecuting Attorney**

Rachel Cornelius  
 Assistant County Attorney  
 307 N State St  
 Waseca, MN 56093  
 (507) 835-0520

Electronically Signed:  
 10/10/2018 08:35 AM

**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 **October 30, 2018 at 10:00 AM** before the above-named court at 307 N State St, Waseca, MN 56093 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: October 10, 2018.

**Judicial Officer**Carol M Hanks  
District Court Judge

Electronically Signed: 10/10/2018 09:28 AM

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

**COUNTY OF WASECA  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**Rachelle Lynn Schoknecht**

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:

81-CR-18-816  
**DEFENDANT FACT SHEET**

Filed in District Court  
State of Minnesota  
10/10/2018

**Name:** Rachelle Lynn Schoknecht  
**DOB:** 11/08/1970  
**Address:** 1517 Marsh Street  
Mankato, MN 56001

**Alias Names/DOB:**

**SID:**

**Height:**

**Weight:**

**Eye Color:**

**Hair Color:**

**Gender:** FEMALE

**Race:**

**Fingerprints Required per Statute:** Yes

**Fingerprint match to Criminal History Record:** No

**Driver's License #:**

**Alcohol Concentration:**

**STATUTE AND OFFENSE GRID**

<b>Cnt Nbr</b>	<b>Statute Type</b>	<b>Offense Date(s)</b>	<b>Statute Nbrs and Descriptions</b>	<b>Offense Level</b>	<b>MOC</b>	<b>GOC</b>	<b>Controlling Agencies</b>	<b>Case Numbers</b>
1	Charge	9/7/2018	609.52.2(a)(4) Theft-By Swindle	Felony	TT999	N	MN0810300	18006325
	Penalty	9/7/2018	609.52.3(3)(a) Theft-Value of Property or Services \$1001-\$5,000	Felony	TT999	N	MN0810300	18006325