

State of Minnesota
County of Dakota

District Court
1st Judicial District

Prosecutor File No. CA-2017-02777
Court File No. 19HA-CR-18-1571

State of Minnesota,
Plaintiff,

COMPLAINT
Summons

vs.

LORI JANINE HOEFS DOB: 09/16/1961

13047 25th Ave NW
Oronoco, MN 55960

Defendant.

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: Criminal Vehicular Homicide (Gross Negligence)

Minnesota Statute: 609.2112.1(a)(1)

Maximum Sentence: 0-10 Years and/or \$6,000.00 - \$20,000.00

Offense Level: Felony

Offense Date (on or about): 10/22/2016

Control #(ICR#): 16409017

Charge Description: On or about October 22, 2016, in the County of Dakota, Minnesota, LORI JANINE HOEFS, did cause the death of a human being not constituting murder or manslaughter as a result of operating a motor vehicle in a grossly negligent manner; to wit: BT

COUNT II

Charge: Criminal Vehicular Operation Resulting in Substantial Bodily Harm (Gross Negligence)

Minnesota Statute: 609.2113.2(1)

Maximum Sentence: 0-3 Years and/or \$3,000.00 - \$10,000.00

Offense Level: Felony

Offense Date (on or about): 10/22/2016

Control #(ICR#): 16409017

Charge Description: On or about October 22, 2016, in the County of Dakota, Minnesota, LORI JANINE HOEFS, did cause substantial bodily harm to another as a result of operating a motor vehicle in a grossly negligent manner; to wit: GT.

COUNT III

Charge: Criminal Vehicular Operation Resulting in Bodily Harm (Gross Negligence)

Minnesota Statute: 609.2113.3(1)

Maximum Sentence: 0-1 Year and/or \$900.00 - \$3,000.00

Offense Level: Gross Misdemeanor

Offense Date (on or about): 10/22/2016

Control #(ICR#): 16409017

Charge Description: On or about October 22, 2016, in the County of Dakota, Minnesota, LORI JANINE HOEFS, did cause bodily harm to another as a result of operating a motor vehicle in a grossly negligent manner; to wit: RP.

COUNT IV

Charge: Criminal Vehicular Operation Resulting in Bodily Harm (Gross Negligence)

Minnesota Statute: 609.2113.3(1)

Maximum Sentence: 0-1 Year and/or \$900.00 - \$3,000.00

Offense Level: Gross Misdemeanor

Offense Date (on or about): 10/22/2016

Control #(ICR#): 16409017

Charge Description: On or about October 22, 2016, in the County of Dakota, Minnesota, LORI JANINE HOEFS, did cause bodily harm to another as a result of operating a motor vehicle in a grossly negligent manner; to wit: EM.

STATEMENT OF PROBABLE CAUSE

On October 22, 2016, at approximately 10:24 a.m., troopers and deputies responded to a crash at Highway 56 and County Road 88 in Randolph Township, Dakota County, Minnesota. Upon arrival, they observed three vehicles that were involved in the crash: a silver Toyota, a silver GMC, and a black Ford. A fourth vehicle, parked in a nearby parking lot, also sustained damage from the crash debris.

The driver of the GMC was identified as Lori Janine Hoefs, DOB: 9/16/1961. Hoefs provided a statement. She said she was traveling westbound on County Road 88. She said she was unfamiliar with the area and she did not see the stop sign. She ran the stop sign and crashed into the Toyota that had been traveling northbound on Highway 56. She said she was on her phone at the time of the crash. She said she had the phone on speakerphone, but was holding it in her hand while talking to a friend.

The driver of the Toyota was identified as GT. GT said he was traveling northbound on Highway 56 when he was hit on the passenger side of his vehicle. He said he did not have a stop sign at the intersection. His sister, BT, was in the front passenger seat of the Toyota. BT sustained fatal injuries as a result of the crash. GT sustained broken ribs and a broken pelvis as a result of the crash.

When the GMC hit the Toyota, the Toyota was pushed into the southbound lanes and crashed into the black Ford. EM was the driver of the black Ford. RP was the front seat passenger in the Ford. EM sustained injuries to her ankle as a result of the crash. RP sustained a gash to her head as a result of the crash.

The crash reconstruction showed that the GMC did not stop, brake or make any evasive maneuvers prior to the crash. There is one sign warning westbound traffic on County Road 88 of the upcoming stop sign. The pavement is painted with "STOP AHEAD" for westbound traffic on County Road 88. At the intersection of County Road 88 and Highway 56, for westbound traffic on County Road 88, there is a stop sign.

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.

Complainant

Eric Zastrow
State Trooper
3489 Hadley Ave N
Oakdale, MN 55128
Badge: 85

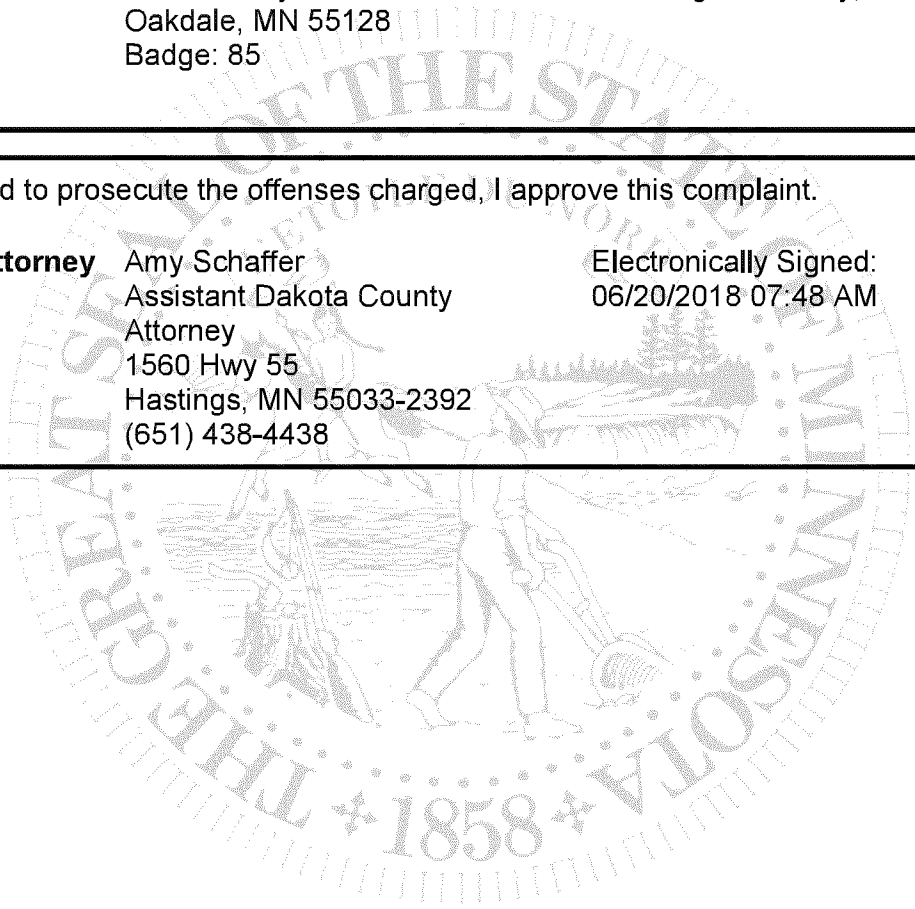
Electronically Signed:
06/20/2018 08:18 AM
Washington County, MN

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

Prosecuting Attorney

Amy Schaffer
Assistant Dakota County
Attorney
1560 Hwy 55
Hastings, MN 55033-2392
(651) 438-4438

Electronically Signed:
06/20/2018 07:48 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 **August 6, 2018 at 9:00 AM** 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: June 20, 2018.

Judicial Officer

Shawn M. Moynihan
Judge of District Court

Electronically Signed: 06/20/2018 08:37 AM

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

COUNTY OF DAKOTA
STATE OF MINNESOTA

State of Minnesota

Plaintiff

vs.

Lori Janine Hoefs

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: