

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 22A11499
Court File No. 27-CR-22-21567

State of Minnesota,

COMPLAINT

Plaintiff,

Summons

vs.

SAMUEL OTIS BRINTON DOB: 09/11/1987

752 College Pkwy
Rockville, MD 20850

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: Theft-Take/Use/Transfer Movable Prop-No Consent

Minnesota Statute: 609.52.2(a)(1)

Maximum Sentence: 5 years, \$10,000 or both

Offense Level: Felony

Offense Date (on or about): 09/16/2022

Control #(ICR#): 22006792

Charge Description: That on or about 9/16/2022, in Hennepin County, Minnesota, Samuel Otis Brinton intentionally and without claim of right, took, used, transferred, concealed or retained possession of movable property belonging to Victim without consent and with the intent to deprive the owner/entity permanently of possession of the property, and the property

Complainant has investigated the facts and circumstances of this offense and believes the following establishes probable cause:

On September 16, 2022, law enforcement at the Minneapolis St. Paul (MSP) Airport, which is located in Hennepin County, Minnesota, were alerted to a missing suitcase in the baggage claim area. The victim, a known adult female, stated she and her son flew into MSP on a Delta flight from New Orleans. Victim proceeded to baggage Carousel 7 to claim her checked bag, which is a navy blue hard-sided Vera Bradley 26-inch roller bag. The bag was scanned as arriving at 16:40 hours at the MSP Airport but was missing from the carousel.

Law enforcement obtained the video surveillance for Carousel 7. At 16:45 hours, officers observe the suspect, who was later identified as SAMUEL OTIS BRINTON, DEFENDANT herein, remove a navy blue hard-sided roller bag from the rear of Carousel 7. DEFENDANT removed the blue bag's tag and put the bag tag in the handbag they were carrying. DEFENDANT then left the area at a quick pace. Police took a digital photo of the bag removed by DEFENDANT and showed it to Victim who confirmed it was her bag.

Law enforcement confirmed DEFENDANT arrived at MSP Airport on an American-Airlines flight at 16:27 hours from Washington D.C. They were able to track DEFENDANT'S movements throughout the airport. After DEFENDANT took the blue bag from Carousel 7, DEFENDANT is observed leaving the airport in a Rideshare vehicle with the blue bag. Records from American-Airlines confirmed that DEFENDANT did not check a bag when DEFENDANT departed Washington D.C. to MSP Airport.

Law enforcement learned DEFENDANT stayed at the InterContinental St. Paul Riverfront hotel. Video surveillance from the hotel showed DEFENDANT checking in with the blue bag.

DEFENDANT returned to the MSP Airport on September 18. Video surveillance shows DEFENDANT checking the blue bag for a departing flight back to Washington D.C. Victim subsequently provided an itemized list for the contents of the bag and their value. The total estimated value of the contents and the bag came to \$2325.00.

Your Complainant obtained video surveillance of DEFENDANT traveling on October 9, 2022 at the Washington Dulles Airport on a return trip from Europe. DEFENDANT was carrying a navy blue hard-sided roller bag. Your Complainant showed a close-up picture of the bag to Victim who confirmed it was her missing bag.

On October 9, 2022, your Complainant called DEFENDANT to speak about the incident. Your Complainant asked DEFENDANT if they took anything that did not belong to them, and DEFENDANT responded "Not that I know of." DEFENDANT later admitted to taking the bag but denied that clothes for another individual were inside. DEFENDANT said "If I had taken the wrong bag, I am happy to return it, but I don't have any clothes for another individual. That was my clothes when I opened the bag." DEFENDANT confirmed still having the blue bag.

Approximately two hours later, DEFENDANT called your Complainant. DEFENDANT apologized for not being "completely honest". DEFENDANT admitted to taking the blue bag, but stated they were tired and took the suitcase thinking it was theirs. DEFENDANT said when they opened the bag at the hotel, they realized it was not theirs. DEFENDANT got nervous people would think they stole the bag and did not know what to do. DEFENDANT stated they left the clothes from the bag inside the drawers in the hotel room. DEFENDANT admitted to taking the blue bag back to the airport on September 18 and checking

the bag that did not belong to DEFENDANT. Your Complainant further questioned DEFENDANT on why check the bag on September 18, and DEFENDANT responded they did not want to leave the bag in the hotel room, reasoning it was “weirder” to leave a bag than the clothes.

Your Complainant instructed DEFENDANT on how they could return the bag to Delta at the Washington DC Airport to ensure its return to Victim. As of the date of filing this complaint, Victim has not received the bag back. Your Complainant learned no clothing was recovered from the hotel room.



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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

Anne Katchmark
Police Officer
4300 Glumack Drive
Suite 3255
St Paul, MN 55111
Badge: 61

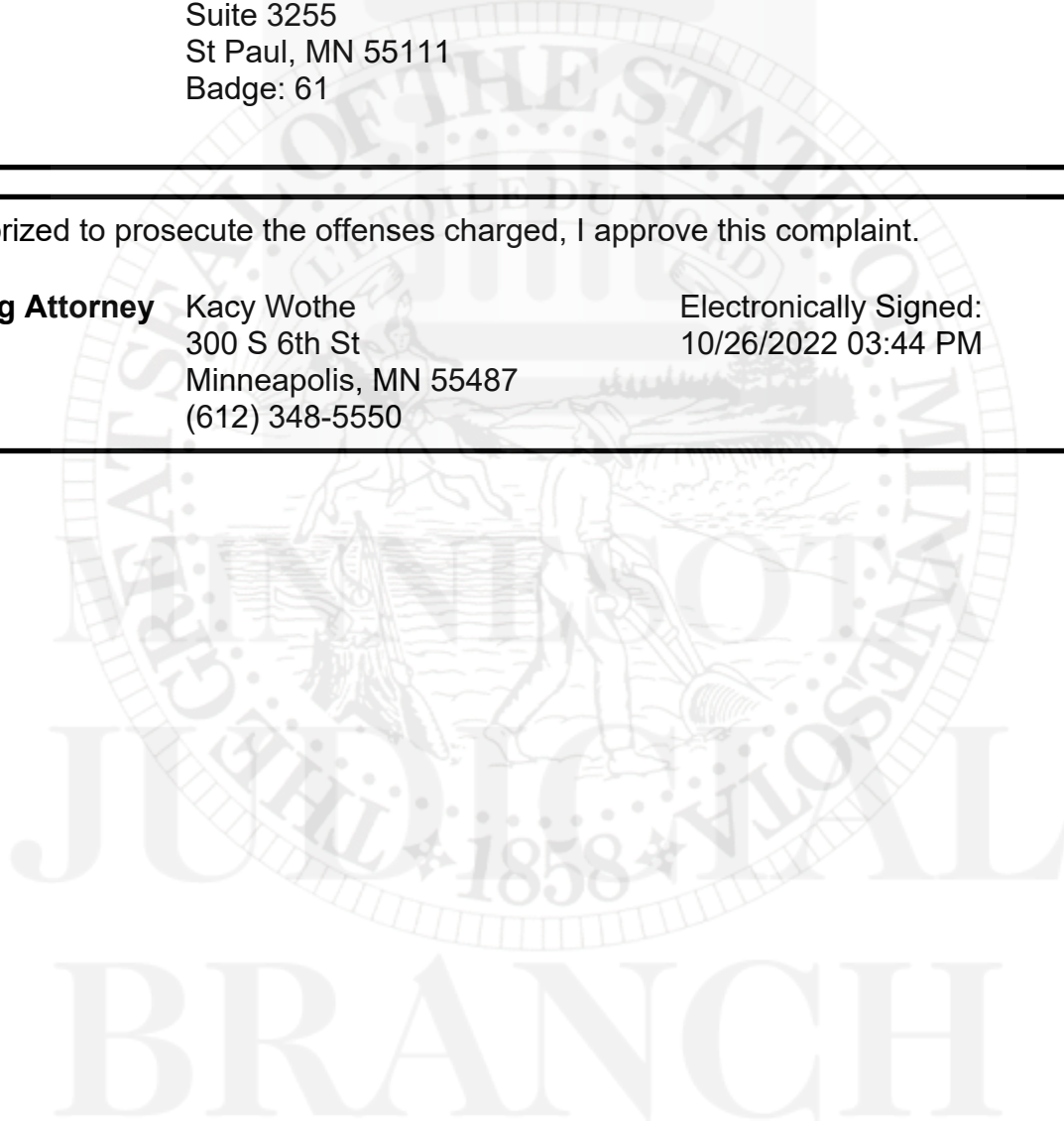
Electronically Signed:
10/26/2022 04:13 PM
Hennepin County, Minnesota

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

Prosecuting Attorney

Kacy Wothe
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
10/26/2022 03:44 PM



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 as directed in the Notice of Hearing before the above-named court 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: \$0.00

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 26, 2022.

Judicial Officer

Marta M. Chou
District Court Judge

Electronically Signed: 10/26/2022 04:13 PM

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

**COUNTY OF HENNEPIN
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Samuel Otis Brinton

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:

27-CR-22-21567
DEFENDANT FACT SHEET

Filed in District Court
State of Minnesota
10/27/2022

Name: Samuel Otis Brinton
DOB: 09/11/1987
Address: 752 College Pkwy
Rockville, MD 20850

Alias Names/DOB:

SID:

Height:

Weight:

Eye Color:

Hair Color:

Gender:

Race:

Fingerprints Required per Statute:

Fingerprint match to Criminal History Record:

Driver's License #:

SILS Person ID #:

SILS Tracking No.

Alcohol Concentration:

UNKNOWN -

White

Yes

No

911970

3302253

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STATUTE AND OFFENSE GRID

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	9/16/2022	609.52.2(a)(1) Theft-Take/Use/Transfer Movable Prop-No Consent	Felony	TC019		MN0272500	22006792



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