

State of Minnesota
County of Chisago

District Court
10th Judicial District

Prosecutor File No.
Court File No.

CR-2024-87
13-CR-24-298

State of Minnesota,

Plaintiff,

vs.

ROBERT JOHN MANUEL DOB: 08/02/1976

7525 Fourth Avenue
Lino Lakes, MN 55014

Defendant.

COMPLAINT

Warrant

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 Sex Conduct-3rd Degree-Victim 13-15 Actor greater than 24m older

Minnesota Statute: 609.344.1(b), with reference to: 609.344.2(1)

Maximum Sentence: 15 years and \$30,000

Offense Level: Felony

Offense Date (on or about): 03/17/2018 to 03/17/2020

Control #(ICR#): 23005249

Charge Description: On or about Saturday, March 17, 2018 to Tuesday, March 17, 2020 the defendant engage in sexual penetration with another person at least 13 but less than 16 years of age, to wit: X.X., said defendant being more than 24 months older than the victim. The offense occurred in Chisago County, Minnesota.

On November 21, 2023, a Lakes Area Police Officer met with X.X., now 20 years old, who wished to report prior sexual assaults that occurred when she was a teenager. X.X. stated when she was in 7th or 8th grade, she started talking explicitly with an older man she met online. X.X. stated she met the man on an app called Whisper, where you can post your feelings anonymously and other people can respond. X.X. stated when she started talking to this man, she was between 12 and 14 years old and believed he was in his 20s. X.X. stated she chatted with him online for about six months before meeting him in person. X.X. stated the first time she met him in person was her 14th birthday, which was 03/17/2018. X.X. stated the man called himself Robert Nofsinger. X.X. stated they started talking on Snapchat and his username was random_target. X.X. stated the man told her he lived in Coon Rapids with his elderly mother.

X.X. stated she soon began a romantic and sexual relationship with him until her 16th birthday. X.X. stated she would sneak out of her house or tell her parents she was staying at a friend's house. X.X. stated they had sexual intercourse in vehicles he would pick her up in, at her home in Chisago City, Chisago County Minnesota, and at his mother's house in Coon Rapids, MN. X.X. stated this included penile-vaginal intercourse and she would give him oral sex. X.X. stated some of the sex would be consensual and some he coerced her into doing it. X.X. stated the man would give her marijuana and other drugs when they were together. X.X. stated she stopped seeing the man when she was about 16 because she had met another boy her own age.

The Lakes Area Police Department applied for and obtained a search warrant to obtain Snapchat records for username random_target. The records returned showed significant conversations with the Snapchat account of X.X. and random_target. The phone number associated with Snapchat user random_target showed as 763-458-3493. Using law enforcement databases, law enforcement learned this phone number is attached to ROBERT JOHN MANUEL (DOB: 08/02/1976), herein Defendant, with an address of 12074 Evergreen Street NW in the City of Coon Rapids, Minnesota. In comparing DVS photos of Defendant, to those on the Snapchat profile for random_target, the officer believed the individuals were one in the same. Defendant is required to register as a predatory offender.

On April 5, 2024, a Lakes Area Police Officer met with X.X. to complete a photo lineup. X.X. was told the suspect in her sexual assault may, or may not, be listed in the lineup. The Officer then provided a photo, one at a time, to X.X. to review. When X.X. saw photo #4, the Officer observed X.X. began to look away from the photo and start crying. X.X. put her face in her shirt and continued crying. After a period of time, X.X. stated photo number #4 is the man. When asked how sure she was, X.X. stated "I'm positive." X.X. stated she wish she wasn't, and stated she sees him in her flashbacks and wishes she could stop seeing that face.

Defendant is currently incarcerated at MCF-Lino Lakes serving a sentence for dissemination of child pornography.

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

William Schlumbohm
Chief of Police
13292 Sylvan Ave
Lindstrom, MN 55045
Badge: 301

Electronically Signed:
04/27/2024 04:41 PM
Chisago County, Minnesota

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

Prosecuting Attorney

David W Hemming
Assistant Chisago County
Attorney
313 N Main St
Center City, MN 55012
(651) 213-8400

Electronically Signed:
04/26/2024 02:50 PM

13-CR-24-298
FINDING OF PROBABLE CAUSE

Filed in District Court
State of Minnesota
4/29/2024

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: \$50,000.00

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: April 29, 2024.

Judicial Officer

Bridgid Dowdal
Judge

Electronically Signed: 04/29/2024 02:52 PM

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

**COUNTY OF CHISAGO
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Robert John Manuel

Defendant

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

Signature of Authorized Service Agent:

13-CR-24-298
DEFENDANT FACT SHEET

*Filed in District Court
State of Minnesota
4/29/2024*

Name: Robert John Manuel
DOB: 08/02/1976
Address: 7525 Fourth Avenue
Lino Lakes, MN 55014

Alias Names/DOB:

SID:

Height:

Weight:

Eye Color:

Hair Color:

Gender:

MALE

Race:

Fingerprints Required per Statute:

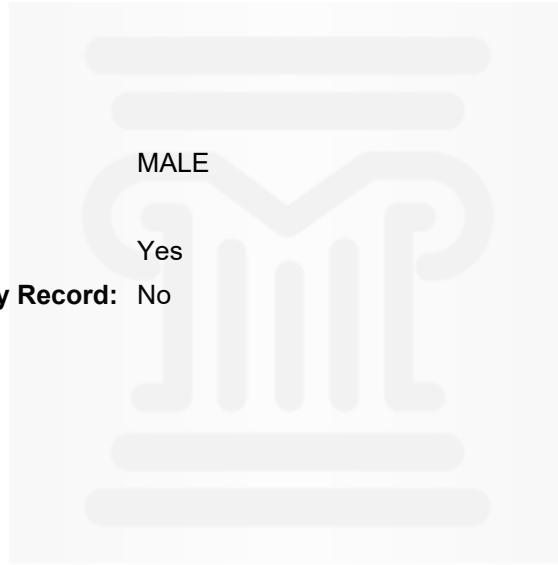
Yes

Fingerprint match to Criminal History Record:

No

Driver's License #:

Alcohol Concentration:



MINNESOTA
JUDICIAL
BRANCH

13-CR-24-298
STATUTE AND OFFENSE GRID

Filed in District Court
 State of Minnesota
 4/29/2024

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	3/17/2018	609.344.1(b) Criminal Sex Conduct-3rd Degree-Victim 13-15 Actor >24m older	Felony	L5103	N	MN0130900	23005249
	Penalty	3/17/2018	609.344.2(1) Criminal Sexual Conduct-3rd Degree-Penalty	Felony	L5103	N	MN0130900	23005249



MINNESOTA
 JUDICIAL
 BRANCH