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STATE OF MINNESOTA  
COUNTY OF DAKOTA

DISTRICT COURT  
FIRST JUDICIAL DISTRICT

COURT FILE NO. \_\_\_\_\_  
COUNTY ATTORNEY FILE NO. CA-09-714  
CONTROLLING AGENCY: MN062095Y  
CONTROL NUMBER: 09000223

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State of Minnesota,

Plaintiff,

SUMMONS  
 WARRANT  
 ORDER OF DETENTION  
 AMENDED

v.

KUNTEE SINGRAMDOO  
16351 Holbrook Ave  
Lakeville MN 55044  
DOB: 5-27-60

Defendant.

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**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):

**COUNT I**

**THEFT (AGGREGATING)**

M.S. § 609.52, subd. 2(1), subd. 3(3)(a); 609.101

0-5 years and/or \$3,000-\$10,000

MOC: TC111

GOC: N

Felony

Gross Misdemeanor

Misdemeanor

Petty Misdemeanor

That on or about February 9, 2004, in Dakota County, Minnesota, KUNTEE SINGRAMDOO, did intentionally and without claim of right take, use, transfer, conceal or retain possession of movable property of another without the other's consent and with intent to deprive the owner permanently of possession of the property, and the value of the property stolen is more than \$500 but not more than \$2,500.

COUNT II

THEFT (AGGREGATING)

M.S. § 609.52, subd. 2(1), subd. 3(2); 609.101

0-10 years and/or \$6,000-\$20,000

MOC: TB111 GOC: N

Felony                     Gross Misdemeanor                     Misdemeanor                     Petty Misdemeanor

That between December 3, 2004 through April 28, 2005, in Dakota County, Minnesota, KUNTEE SINGRAMDOO, did intentionally and without claim of right take, use, transfer, conceal or retain possession of movable property of another without the other's consent and with intent to deprive the owner permanently of possession of the property, and the value of the property stolen is in excess of \$2,500.

COUNT III

THEFT BY SWINDLE (AGGREGATING)

M.S. § 609.52, subd. 2(4), subd. 3(1); 609.101

0-20 years and/or \$30,000-\$100,000

MOC: TA111 GOC: N

Felony                     Gross Misdemeanor                     Misdemeanor                     Petty Misdemeanor

That between May 3, 2005 and October 26, 2005, in Dakota County, Minnesota, KUNTEE SINGRAMDOO did obtain property or services from another person by swindling, whether by artifice, trick, device, or any other means, and the value of the property is in excess of \$35,000.

COUNT IV

THEFT BY SWINDLE (AGGREGATING)

M.S. § 609.52, subd. 2(4), subd. 3(1); 609.101

0-20 years and/or \$30,000-\$100,000

MOC: TA111 GOC: N

Felony                     Gross Misdemeanor                     Misdemeanor                     Petty Misdemeanor

That between November 4, 2005 and April 20, 2005, in Dakota County, Minnesota, KUNTEE SINGRAMDOO did obtain property or services from another person by swindling, whether by artifice, trick, device, or any other means, and the value of the property is in excess of \$35,000.

COUNT V

THEFT BY SWINDLE (AGGREGATING)

M.S. § 609.52, subd. 2(4), subd. 3(1); 609.101

0-20 years and/or \$30,000-\$100,000

MOC: TA111 GOC: N

Felony  Gross Misdemeanor  Misdemeanor  Petty Misdemeanor

That between April 25, 2006 and October 18, 2006, in Dakota County, Minnesota, KUNTEE SINGRAMDOO did obtain property or services from another person by swindling, whether by artifice, trick, device, or any other means, and the value of the property is in excess of \$35,000.

COUNT VI

THEFT (AGGREGATING)

M.S. § 609.52, subd. 2(1), subd. 3(2); 609.101

0-10 years and/or \$6,000-\$20,000

MOC: TB111 GOC: N

Felony  Gross Misdemeanor  Misdemeanor  Petty Misdemeanor

That between October 25, 2006 and March 2, 2007, in Dakota County, Minnesota, KUNTEE SINGRAMDOO, did intentionally and without claim of right take, use, transfer, conceal or retain possession of movable property of another without the other's consent and with intent to deprive the owner permanently of possession of the property, and the value of the property stolen is in excess of \$2,500.

COUNT VII

THEFT (AGGREGATING)

M.S. § 609.52, subd. 2(1), subd. 3(3)(a)

0-5 years and/or \$3,000-\$10,000

MOC: TC111 GOC: N

Felony  Gross Misdemeanor  Misdemeanor  Petty Misdemeanor

That during June 2007, in Dakota County, Minnesota, KUNTEE SINGRAMDOO, did intentionally and without claim of right take, use, transfer, conceal or retain possession of movable property of another without the other's consent and with intent to deprive the owner permanently of possession of the property, and the value of the property stolen is more than \$500 but not more than \$2,500.

COUNT VIII

THEFT (AGGREGATING)

M.S. § 609.52, subd. 2(1), subd. 3(3)(a)

0-5 years and/or \$3,000-\$10,000

MOC: TT111                      GOC: N

Felony                       Gross Misdemeanor                       Misdemeanor                       Petty Misdemeanor

That during February 2008, in Dakota County, Minnesota, KUNTEE SINGRAMDOO, did intentionally and without claim of right take, use, transfer, conceal or retain possession of movable property of another without the other's consent and with intent to deprive the owner permanently of possession of the property, and the value of the property stolen is more than \$1,000 but not more than \$5,000.

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Your Complainant is an Investigator with the Minnesota Department of Commerce. In that capacity I have reviewed the police reports and believe the following to be true.

The Minnesota Department of Commerce (MNDOC) received information about a possible insurance fraud case involving Kuntée Singramdoo. The records from MNDOC show that on November 5, 1999, the MNDOC issued Singramdoo a real estate closing license. MNDOC records also show that on January 29, 2007, Singramdoo was issued a resident insurance producer license. MNDOC records show that on February 7, 1997, Singramdoo was commissioned as a notary public. At the time of the alleged offenses Singramdoo's licenses and commissions were all active.

Singramdoo worked as an independent closer at Walsh Title & Real Estate Services, Inc., (Walsh) located in Burnsville, Dakota County, Minnesota, during the time period February 2004 through February 2008. Singramdoo also resided at a home in Lakeville, Dakota County, Minnesota. Singramdoo performed real estate closing services at Walsh incident to real estate transactions, including preparing and distributing checks from Walsh's trust account and title insurance. Through investigation it was determined that Singramdoo engaged in a pattern of insurance/mortgage fraud, (by using proceeds intended for mortgage insurance or title

insurance) by misappropriating, converting and/or embezzling those proceeds by issuing checks for her own benefit or the benefit of her family members from Walsh's trust and title insurance accounts.

Walsh first learned of the defalcations (the fraudulent appropriation of funds or property entrusted to a person's care but actually owned by someone else), after a party to a real estate transaction performed by Singramdoo, inquired about discrepancies between his HUD-1 Settlement Statement and the actual disbursements made by Singramdoo. Walsh subsequently discovered that Singramdoo misappropriated or converted or embezzled monies that should have been disbursed as part of real estate closings.

Singramdoo used one of several methods to accomplish her thefts. For example, Singramdoo would write checks for her own personal bills or her family members bills out of a closing and then entered those payments directly on the HUD-1 as if the obligation was owned by the buyer or seller involved in the transaction. Another method used by Singramdoo, was to accurately prepare the HUD-1 for purposes of the real estate closing and then would subsequently change the HUD-1 at a later date to reflect the fraudulent payments. Singramdoo would also validly issue checks and then never tender them to the payee and subsequently re-issue the checks to pay her own or her family member's creditors.

During a phone call on January 8, 2008, as well as in a statement taken under oath on May 8th and September 10, 2008, Singramdoo admitted to the Minnesota Department of Commerce that she misappropriated, converted and/or embezzled her client's funds by issuing checks for her own benefit or the benefit of her family members. Singramdoo stated she had overwhelming personal debts and swindled her client's money to cover those debts.

The investigation and examination of the records of various real estate closings conducted by Singramdoo revealed the following thefts:

On February 9, 2004 Singramdoo stole funds in the amount of \$656.09 from clients during the course of her employment as a closer at Walsh Title & Real Estate Services Inc.

During the time period from December 3, 2004 through April 28, 2005 Singramdoo stole approximately \$19,300 from clients during the course of her employment as a closer at Walsh Title & Real Estate Services Inc.

During the time period of May 3, 2005 through October 26, 2005, Singramdoo stole approximately \$64,900 from clients during the course of her employment as a closer at Walsh Title & Real Estate Services Inc.

During the time period of November 4, 2005 through April 20, 2006, Singramdoo stole approximately \$52,400 from clients during the course of her employment as a closer at Walsh Title & Real Estate Services Inc.

During the time period of April 25, 2006 through October 18, 2006, Singramdoo stole approximately \$60,800 from clients during the course of her employment as a closer at Walsh Title & Real Estate Services Inc.

During the time period of October 25, 2006 through March 2, 2007, Singramdoo stole approximately \$22,500 from clients during the course of her employment as a closer at Walsh Title & Real Estate Services Inc.

During the time period of June 2007, Singramdoo stole approximately \$1,400 from clients during the course of her employment as a closer at Walsh Title & Real Estate Services Inc.

During the time period of February 2008, Singramdoo stole approximately \$1,400 from clients during the course of her employment as a closer at Walsh Title & Real Estate Services Inc.

***NOTICE: You must appear for every court hearing on this charge. A failure to appear for court on this charge is a criminal offense and may be punished as provided in Minn. Stat. §609.49.***

Complainant requests that Defendant, KUNTEE SINGRAMDOO, 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

COMPLAINANT'S SIGNATURE

\_\_\_\_\_

\_\_\_\_\_

Subscribed and sworn to before the undersigned this \_\_\_\_ day of \_\_\_\_\_, 2009.

NOTARY STAMP:

SIGNATURE

\_\_\_\_\_  
Notary Public

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

Date: \_\_\_\_\_ (rac)

PROSECUTING ATTORNEY SIGNATURE:

\_\_\_\_\_  
Name: Helen R. Brosnahan  
Assistant Dakota County Attorney  
Dakota County Judicial Center  
1560 Highway 55  
Hastings MN 55033  
(651) 438-4438  
Attorney Registration No.: 0266887

**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.

**[ ] SUMMONS**

THEREFORE YOU, THE ABOVE-NAMED DEFENDANT, ARE HEREBY SUMMONED to appear on the date stated on the attached Notice of Hearing before the above-named court at Dakota County Judicial Center, 1560 Highway 55, Hastings, Minnesota, 55033 to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

**[X] WARRANT**

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 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 as such Judge or Judicial Officer is available to be dealt with according to law.

*[ ] Execute in MN Only    [ ] Execute Nationwide    [ ] Execute in MN and Border States*

**[ ] ORDER OF DETENTION**

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

Bail: \$  
Conditions of Release:

This complaint, duly subscribed and sworn to, issued by the undersigned Judicial Officer this  
22 day of June, 2009.

**JUDICIAL OFFICER:  
NAME:**

**SIGNATURE:**

**TITLE: JUDGE OF DISTRICT COURT**

/s/ \_\_\_\_\_  
Judge

COUNTY OF DAKOTA  
STATE OF MINNESOTA

*Clerk’s Signature or File Stamp*

**STATE OF MINNESOTA**

Plaintiff,

vs.

Kuntée Singramdoo

Defendant.

**RETURN OF SERVICE**  
*I hereby Certify and Return that I have served a copy of this  
COMPLAINT upon the Defendant herein named.*

Signature of Authorized Service Agent:  
\_\_\_\_\_

