

State of Minnesota  
County of Blue Earth

District Court  
5th Judicial District

Prosecutor File No. 0070104230  
Court File No. 07-CR-23-1176

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**State of Minnesota,**

Plaintiff,

vs.

**CONNER LEE HOEFT DOB: 01/08/2002**

835 Center Street  
North Mankato, MN 56003

Defendant.

**COMPLAINT**

Order of Detention

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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: Aid and Abet Murder - 3rd Degree - Sell/Give/Distribute Controlled Substance - Schedules 1 & 2**

Minnesota Statute: 609.195(b), with reference to: 609.05.1

Maximum Sentence: 25 years or \$40,000 fine, or both

Offense Level: Felony

Offense Date (on or about): 11/30/2022 to 12/01/2022

Control #(ICR#): 22028481

Charge Description: On or between November 30, 2022 and December 1, 2022, in the County of Blue Earth, Minnesota, Conner Lee Hoeft, did intentionally aid, advise, hire, counsel, or conspire with or otherwise procures another to, without intent to cause death, proximately cause the death of a human being by, directly or indirectly, unlawfully selling, giving away, bartering, delivering, exchanging, distributing, or administering a controlled substance classified in Schedule I or II.

## STATEMENT OF PROBABLE CAUSE

On December 1, 2022 at 11:47 AM, officers of the Mankato Department of Public Safety were dispatched to a suspected overdose at a residence located in Blue Earth County. Haley Marie Ross (DOB 11/9/1999) called 911 and reported her roommate, who was later identified as Victim, and her roommate's boyfriend had overdosed. Dispatch advised responding officers one of the overdose victims was not breathing, both patients were unresponsive and lying on top of each other, and Victim was cold.

Detective Sergeant Knutson arrived on scene where Ross let him into the apartment and directed him to the rear bedroom. Detective Knutson observed Victim and Connor Lee Hoeft (DOB 01/08/2002). Victim was cold to the touch and lying face down. Detective Knutson could hear Hoeft breathing and snoring loudly with what appeared to be agonal breaths. Detective Knutson noted Victim was deceased; rigor had set in and Detective Knutson observed lividity on Victim's side. Detective Knutson attempted to wake Hoeft who was unresponsive. As Detective Knutson was attempting to give Hoeft Narcan, Hoeft opened his eyes and sat up. Hoeft was disoriented and did not understand what was going on. Hoeft denied taking any drugs but was otherwise generally unable to respond to questions. Paramedics transported Hoeft to a hospital.

Officer Wood spoke with Ross who stated she is a tenant of the apartment and Victim was her roommate and friend. Ross reported Victim was in a relationship with Hoeft who was not a tenant of the apartment, but Hoeft had stayed the night regularly over the past couple of months. Ross reported Victim and Hoeft are known to use narcotics and stated their drug of choice was cocaine. Ross noted when they use they use in Victim's room. Ross denied any knowledge of recent drug use by Hoeft or Victim and claimed she last saw Hoeft and Victim on December 1 at between 12:30 AM and 1 AM. Ross stated when she got up for the day she approached Victim's bedroom door and knocked because some tapestry was damaged by Victim's cat. She received no answer so Ross jimmed the lock open with her fingernail and after she entered she realized she had heard choking noises. Ross stated she was shocked by what she observed and called 911.

Agent Gagnon of the Minnesota River Valley Drug Task Force responded. In Victim's bedroom, Agent Gagnon observed multiple pieces of tinfoil with burnt markings that through his training and experience he recognized as paraphernalia consistent with controlled substance use; specifically, the ingestion of fentanyl pills often referred to as "Percs," "Blues," or "30s." In addition, officers located a rolled up dollar bill with a white substance that field-tested positive for cocaine, a gray hollowed pen that appeared to be used as a smoking device, Hoeft's phone, and Victim's phone. A smoking straw/device was also located in the common area of the apartment on the kitchen counter.

Agent Nelson of the Minnesota River Valley Drug Task Force responded and conducted a follow up interview with Ross. Ross told Agent Nelson on November 30th Victim returned to the apartment from work at approximately 7 PM. Ross's friend came over to the apartment between 6 and 7 PM. Ross now indicated she contacted Kueth Pamier Ruae (11/25/1997) via Snapchat to purchase marijuana and Ruae dropped off some marijuana and left. Ross told Agent Nelson Hoeft arrived at the apartment between 9 and 10 PM and he and Victim went into Victim's bedroom and she had minimal contact with them that night. Ross now stated when she woke up she heard an alarm going off in Victim's bedroom so she opened the door and found victim unresponsive and Hoeft nearly unresponsive so she called 911 for help.

Ross then revealed Victim had been asking for "Blues" recently. Ross denied knowing what blues were but suspected they were fentanyl laced pills. Ross claimed Hoeft could have gotten pills from Witness 1. Ross stated Kueth provided her information about Witness 1.

Search warrants were obtained for Ross, Hoeft, and Victim's cell phones. Agent Gagnon observed multiple

messages between Ross and Hoeft talking about the purchase of pills. The messages were sent via Snapchat. Agent Gagnon also observed financial transactions via Venmo on Hoeft's phone indicating he transferred money to Ross on multiple occasions on November 30 and December 1.

On December 21st, Ross spoke with Agent Gagnon to report information she remembered. Ross now indicated Ruae stopped by her apartment to bring her a marijuana joint, but claimed he lost the joint. Ruae then asked Ross if they wanted to try "Percs." Ross stated she and Victim said ok and they tried the pills via smoking it with an empty straw. Ross stated Ruae had called using Witness 1's phone to let them know he was at their apartment. Ross now stated Hoeft was jealous Ross and Victim had taken a hit of the pill and said he wanted some. Ross then gave Hoeft her phone so he could contact Witness 1 to see if Witness 1 had more pills. Ross indicated Ruae stopped by at around 9:00 p.m. and she observed Witness 1 around midnight in the apartment, but Ross stated she did not see any pills. Ross identified Ruae as someone that has sold her marijuana in the past. Although Ross claimed she did not pay for the pills, she believed they sell for \$10-\$15. Ross also claimed Hoeft had sent her \$30 via Venmo that night for money for drinks right before she went to bed. When asked if she had Venmo usernames for Victim and Hoeft, Ross claimed she lost her password and cannot log in. When asked if her email has Venmo transaction receipts, Ross accessed her email account and when multiple Venmo transaction receipts populated she quickly turned off the screen and then claimed she had deleted Venmo entirely.

Ross told officers that Ruae had spoken to her since Victim's death and told her not to use his name. Ross also told officers that she believed Ruae was with Witness 1 as she communicated with Ruae using Witness 1's phone.

Agent Gagnon observed CCTV footage from the apartment complex Ross and Victim lived. It shows Victim arrive November 30 at 7:21 p.m. Ruae arrives at 7:44 p.m and leaves at 8:02 p.m. Hoeft arrives at 10:19 p.m. On December 1, Hoeft exits at 12:54 a.m. and reenters at 1:06 a.m. Witness 1 enters the apartment complex at 1:40 a.m. and exists at 1:43 a.m.

Hoeft was interviewed on December 29, 2022. Hoeft told law enforcement on November 30 that Victim sent him money via Venmo so they could combine their money and send a Venmo transaction to Ross for the purchase of 6 Percocet pills, 2 for each of them. Hoeft believed they were purchasing the "percs" from a drug dealer Ross knew. Hoeft stated he gave Ross the money so she could get the stuff before he was off work. He sent Ross \$90. Hoeft stated when he arrived home he, Ross, and Victim smoked the pills in Victim's room using a pen and tinfoil. The next thing he remembers was being at the hospital.

Ross's phone records indicate she had phone calls with Witness 1's phone number on 5 occasions November 30th at 7:33 p.m., 7:40 p.m., December 1 at 12:43 a.m., 12:53 a.m., and at 1:05 a.m. Ross also sent and received multiple texts between 12:53 a.m. and 1:40 p.m. with Witness 1's phone asking him to let her know when he arrives and confirming he is coming up when he arrives at the apartment. Ross's cell phone and associated content records show Ross deleted her Snapchat and Venmo apps and almost all of the text messages in her phone that occurred between November 30 and December 1.

A search warrant for Witness 1's cell phone known location data was obtained. A review of the data received indicates the phone was located in the immediate area of Victim and Ross's apartment between 1:34 a.m. and 1:51 a.m.

Hoeft's Snapchat records were also investigated. Hoeft and Ross's Snapchat account conversation shows Hoeft sent Ross a message on November 30, 2022 that stated "percs tn" (tn is short for tonight). Ross asks Hoeft when he will be here and Ross indicates he will "Venmo you and make [Victim] go get show with you." Hoeft also sends Ross a message that stated "but just text em and see if we can get shit then I'll Venmo you so you can get shit before I get off just to make sure." Ross responds "Ok bet," followed

by “he’s messaging me rn.” Hoefft messages Ross stating “[Victim] wants 2 I guess I want 3 so I’ll Venmo you 75.” The messages continue to discuss purported drug use. At one point Ross messages Hoefft “Can u Venmo me the 75 plus my 15 then after I get cash out I’ll pay you back.” Later in the day, Ross sends Hoefft a message that states “We got em” and “he let us hit some of his lol.” This last message is consistent with the time Kueth is shown on the surveillance video entering the apartment complex.

A search warrant was obtained for the Venmo accounts of Ross, Hoefft, and Victim. The account records show Hoefft sent Ross \$90 on November 30, 2022 at with a message that stated “Blue.”

Ross also sends Hoefft a message on December 31 at 12:42 a.m. that stated “R u wanting to do anymore? If u do I’ll just do one more little bit then I’m done” and “I’m just asking if y’all r gonna do more or if ur saving them cuz I’d do one more baby hit then I’ll be done.”

At 5:17 a.m. on December 31, Hoefft asks Ross “can I buy one of your percs” and then he states “I’ll pay you 20.” Ross responds “Yes” and Hoefft indicates he’ll pay \$10 cash and \$10 via Venmo. Ross responds “okok”...”be careful please.” Ross’s Venmo account records show Hoefft paid Ross \$10.00 at 5:21 a.m.

Victim’s cellphone device data shows Victim’s phone was actively unlocked at 5:06 a.m. and active at 5:19 a.m. on December 1st.

An autopsy was performed at the Ramsey County Medical Examiner’s Office. The final autopsy protocol indicated Victim’s cause of death was fentanyl toxicity.

## 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**

Matthew Huettl  
Police Officer  
710 S Front St  
Mankato, MN 56001-3803  
Badge: 3142

Electronically Signed:  
04/04/2023 09:23 AM  
Blue Earth County, Minnesota

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

**Prosecuting Attorney**

Todd Coryell  
Assistant County Attorney  
401 Carver Road  
PO Box 3129  
Mankato, MN 56002  
(507) 304-4600

Electronically Signed:  
04/04/2023 09:06 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 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: \$  
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 4, 2023.

**Judicial Officer**

Kristine Weeks  
District Court Judge

Electronically Signed: 04/04/2023 09:59 AM

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

**COUNTY OF BLUE EARTH  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**Conner Lee Hoefft**

Defendant

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

Signature of Authorized Service Agent: