

State of Minnesota
County of Carlton

District Court
6th Judicial District

Prosecutor File No. 33.EY79.0209
Court File No. 09-CR-23-1226

State of Minnesota,

COMPLAINT

Plaintiff,

Summons

vs.

LACI MARIE SILGJORD DOB: 03/02/1988



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: Financial Exploitation of a Vulnerable Adult (over \$35,000)

Minnesota Statute: 609.2335.1(2)(i), with reference to: 609.52.3(1)

Maximum Sentence: Imprisonment of no more than 20 years, or payment of a fine of no more than \$100,000, or both.

Offense Level: Felony

Offense Date (on or about): 09/21/2020 to 10/28/2020

Control #(ICR#): 20200124

Charge Description: On or about September 21, 2020 through October 28, 2020, in Carlton County, State of Minnesota, Defendant LACI MARIE SILGJORD (dob 03/02/1988), in the absence of legal authority acquired possession or control of an interest in real or personal property or other financial resources of a vulnerable adult, whether held in the name of the vulnerable adult or a third party, through the use of undue influence, harassment, or duress and the value of the of the property or resources obtained was over \$35,000, to wit: SILGJORD, in the absence of legal authority, acquired control of a vulnerable adult's bank accounts that contained \$43,120.57 through the use of undue influence, harassment, or duress.

COUNT II

Charge: Financial Exploitation of a Vulnerable Adult

Minnesota Statute: 609.2335.1(2)(iii), with reference to: 609.2335.3

Maximum Sentence:

Offense Level: Gross Misdemeanor

Offense Date (on or about): 09/21/2020 to 10/28/2020

Control #(ICR#): 20200124

Charge Description: On or about September 21, 2020 through October 28, 2020, in Carlton County, State

of Minnesota, Defendant LACI MARIE SILGJORD (dob 03/02/1988), in the absence of legal authority established a relationship with a fiduciary obligation to a vulnerable adult by use of undue influence, harassment, duress, force, compulsion, coercion, or other enticement to wit: SILGJORD, in the absence of legal authority, acquired control of a vulnerable adult's bank accounts and established a fiduciary relationship with the vulnerable adult through the use of undue influence, harassment, duress, force, compulsion, coercion, or other enticement.

COUNT III

Charge: Attempted Theft by Swindle (over \$35,000)

Minnesota Statute: 609.52.2(a)(4), with reference to: 609.52.3(1), 609.17.1

Maximum Sentence: Imprisonment of no more than 10 years, or payment of a fine of no more than \$50,000, or both.

Offense Level: Felony

Offense Date (on or about): 09/21/2020 to 04/29/2022

Control #(ICR#): 20200124

Charge Description: On or about September 21, 2020 through April 29, 2022 in Carlton County, State of Minnesota, Defendant LACI MARIE SILGJORD (dob 03/02/1988), attempted to obtain property from another person by swindling, whether by artifice or trick, device, or any other means, and the value of the property she attempted to obtain was over \$35,000, to wit: SILGJORD, while having guardianship of a vulnerable adult, made opportunistic bedside recordings of the vulnerable adult, lied to the vulnerable adult's husband about her legal authority over the vulnerable adult and the vulnerable adult's estate, petitioned for inflated guardianship compensation from the vulnerable adult's estate, petitioned for guardianship compensation for tasks for which she had already been compensated, petitioned to obtain the vulnerable adult's entire estate valued at \$158,213.28, and used the opportunistic bedside recordings of the vulnerable adult to achieve this objective.



STATEMENT OF PROBABLE CAUSE

Your affiant, Diane Castro, is an investigator with the Medicaid Fraud Control Unit (MFCU) of the Minnesota Attorney General's Office. As an investigator for the MFCU, I investigate allegations of Medicaid fraud as well as neglect, abuse, and financial exploitation of vulnerable adults. In this capacity, I investigated allegations that Laci Silgjord (SILGJORD), while employed as an officer with the Cloquet Police Department (Cloquet PD) financially exploited a vulnerable adult, Joan Kay Arney (Joan).^[1]

My investigation into SILGJORD involved obtaining and reviewing Joan's medical and banking records. In addition, I obtained and reviewed court records from the district court guardianship and probate proceedings concerning Joan. The court filings included recordings that SILGJORD made of conversations she had with Joan and Joan's husband in the weeks and months before and after Joan's death. I also obtained and reviewed records from the Cloquet PD relating to SILGJORD's employment and the Cloquet's PD's investigation into suspected misconduct involving SILGJORD as it relates to Joan. I spoke with Police Chief Derek Randall of the Cloquet PD, staff at Joan's bank, and an attorney that represented Joan's husband in the probate proceeding.

Based on my investigation, I determined that in the months leading up to Joan's death, SILGJORD used undue influence, coercion, and other enticements to establish a fiduciary relationship with Joan, including being appointed as her guardian. Further, in the weeks leading up to Joan's death SILGJORD financially exploited Joan by using her position as a police officer and Joan's guardian to acquire control of Joan's bank accounts in the absence of legal authority to do so.

In addition, I determined that SILGJORD attempted to exploit Joan and swindle Joan's husband and Joan's estate by: (1) making bedside recordings of Joan in the weeks before her death, while Joan was incapacitated and under SILGJORD's guardianship, where Joan told SILGJORD that she loved her and wanted to take care of her, (2) not telling Joan's husband about Joan's death and lying to him about her legal authority over Joan and Joan's estate, (3) seeking compensation for inflated guardianship fees, (4) seeking guardianship compensation for tasks for which she had already been paid by the Cloquet PD while on duty as an officer, and (5) seeking to obtain Joan's entire estate, and using the opportunistic bedside recordings of Joan in an attempt to achieve this goal.

I. Guardianship and Conservatorship

Minnesota courts have the authority to appoint guardians and conservators for an incapacitated person residing in the state. An incapacitated person is defined as an individual who, for reasons other than being a minor, is impaired to the extent of lacking sufficient understanding or capacity to make or communicate responsible personal decisions, and who has demonstrated deficits in behavior which evidence an inability to meet personal needs for medical care, nutrition, clothing, shelter, or safety. Guardians and conservators are granted limited power to exercise authority over the incapacitated person, and guardians and conservators are subject to the control and direction of the court.

A guardian is appointed to perform duties related to personal care, custody, and control. The guardian has the authority to make decisions such as where the incapacitated person will live and what medical treatment they will receive. In addition, a guardian has the duty to take reasonable care of the clothing, furniture, vehicles, and other personal effects of the person subject to guardianship. Under Minnesota law, a guardianship terminates upon the death of the incapacitated person.

A conservator is appointed to make financial decisions for a protected person. A conservator typically has the power to collect all the conserved assets, pay bills, make investments and perform other financial functions, as well as engage in estate planning, including the right to amend or revoke the protected

person's will. However, a conservator must seek court approval for transactions such as the purchase or sale of real property, gifting of assets, or engaging in estate planning for the protected person.

II. Probate and Intestacy

Probate is the legal process of getting court authority to transfer property of a person after death. To start a probate case, a petition or application must be filed with the court and a personal representative must be appointed by a court order. The personal representative is responsible for collection, inventory, and appraisal of assets of the person who has died; protection of the estate's assets; payment of the debts of the person who has died; and distribution of the remaining assets to the proper parties as provided by law.

When a person dies without a will, they are said to have died "intestate." If a person dies intestate their heirs are entitled to receive their property. If a married person dies without any surviving children, their estate goes to their spouse. However, a decedent's surviving spouse does not have priority to receive certain property that the decedent may have owned jointly with others, such as jointly held bank accounts or jointly held real estate. A will is necessary if a person wants to leave property to a friend or a charity, to give certain items to certain people, or to leave someone out who would otherwise inherit from them.

III. Referral from the Carlton County Attorney's Office and the Cloquet Police Department.

On April 30, 2021, the MFCU received a referral from Chief Randall with the Cloquet PD about a complaint they received about SILGJORD. On May 5, 2021, the MFCU accepted the referral from the Carlton County Attorney's Office. I spoke to Chief Randall about the referral. In a letter dated April 19, 2021, Roger Arney (Roger), the estranged husband of Joan, submitted a complaint to the Cloquet PD. Roger's complaint stated, among other things, that: (1) SILGJORD became Joan's guardian a few months before Joan died, (2) Joan had health problems including suffering from dementia, paranoia, and anxiety attacks, (3) SILGJORD did not notify Roger of Joan's death, (4) SILGJORD had Joan cremated without authority to do so, and (5) SILGJORD knew that Joan was set to inherit money and SILGJORD petitioned the probate court to obtain the entire estate.

Chief Randall informed the MFCU that the Cloquet PD would be conducting an internal investigation of SILGJORD, and to avoid any conflict, was seeking the Attorney General's Office's assistance to review and investigate the allegations.

IV. SILGJORD'S background and training and experience working with vulnerable adults.

I obtained records and information from Chief Randall regarding SILGJORD's background and training. SILGJORD was hired by Cloquet PD in April 2015 and served as an officer with the department until being placed on paid administrative leave on May 12, 2021. SILGJORD was involved with numerous police calls involving vulnerable adults, fraud, and people with mental and physical health concerns. Chief Randall provided me with information about SILGJORD's call history. According to Chief Randall, SILGJORD handled 27 calls where the person associated with the call was determined to be vulnerable. In addition, SILGJORD was involved in at least eight Adult Abuse calls for service. According to Chief Randall, most of these Adult Abuse calls were associated with reports from the Minnesota Adult Abuse Report Center (MAARC). MAARC is operated by the Department of Human Services and MAARC receives reports from people through the state that have information about the maltreatment of vulnerable adults.

Records from the Cloquet PD show that SILGJORD was familiar with MAARC. Chief Randall provided me with several communications that SILGJORD received concerning MAARC reports and how to handle cases involving vulnerable adults. In addition, Chief Randall provided me with the Cloquet PD's current policy manual. Of note, the policy manual contains provisions about financial exploitation, adult abuse, and special considerations officers should take when interviewing vulnerable adults. In addition, the manual

states: “[t]o avoid actual or perceived conflicts of interest members of this department shall refrain from developing or maintaining personal or financial relationships with victims, witnesses or other individuals during the course of, or as a direct result of, any official contact.”

V. Joan's background

Joan Arney lived in Cloquet, and she and Roger Arney were married on April 30, 1976. In an interview conducted as part of the City of Cloquet’s investigation of SILGJORD, Roger said that he and Joan began living apart in 2013, but they never divorced and remained legally married.

Roger was born in 1941 and lives in Wrenshall, which is near Cloquet. In an interview Roger said that he saw Joan occasionally after they separated. Roger also said that in 2013 Joan had anxiety attacks to the point she thought she was having heart attacks, and that she became belligerent and argumentative. Roger said that Joan was hospitalized due to an anxiety attack. Court records show that Joan obtained an order for protection against Roger in 2013. Roger said that he and Joan continued to jointly own land and a home even though they were separated.

Joan died on October 28, 2020 at the age of 78 without a will and with no surviving children. As detailed below, law enforcement, medical, and court records show that Joan had severe physical and mental health problems, including dementia, in the months leading up to her death.

VI. SILGJORD's financial exploitation of Joan.

A. SILGJORD met Joan through her duties as a police officer and learned that Joan was a vulnerable adult.

In a recorded conversation, SILGJORD said that she met Joan during calls for service, and I reviewed reports from the calls for service that Joan made to the Cloquet PD in the year before she died.

On October 6, 2019 Joan called the Cloquet PD to report that she had been “scammed” by an attorney. SILGJORD spoke to Joan on the phone about this issue. The report for this call indicates that Joan had memory issues. SILGJORD met Joan in-person for the first time on May 5, 2020. On that day, Joan called the Cloquet PD to report that her purse was stolen. The report for this call shows that SILGJORD and another officer responded to Joan’s home.

On June 2, 2020, Joan’s half-brother called the Cloquet PD and asked to have someone check on her, because he had been unable to reach her. The report for this call shows that SILGJORD responded to Joan’s home and advised Joan that her half-brother was looking to get in contact with her about “inheritance paperwork”.

On August 25, 2020, SILGJORD and other officers checked in on Joan at her home because she mistakenly sent mail to Cloquet PD. Joan did not answer the door. Officers found her alive, but in very poor condition. Hospital records note that Joan was down in her home for “approximately 4 days” and was found naked and “covered head to toe in feces and urine.” Joan was transported from her home to Community Memorial Hospital in Cloquet. Records from Community Memorial state that Joan was unable to communicate and had abrasions and ulcers on her skin. Joan was hospitalized continuously from August 25, 2020 until she died on October 28, 2020.

B. Joan's hospitalization and diminished capacity.

On August 26, 2020, Joan was transferred from Community Memorial to St. Luke’s Hospital in Duluth. I obtained and reviewed Joan’s medical records as part of my investigation. Records from St. Luke’s show

that Joan had a severely diminished capacity. An August 28, 2020 progress note states that Joan suffered a stroke and had “deficits in attention and memory.” A September 1, 2020 progress note states that Joan did not know the current year and “states that we are at her house which is where the houses are located.” A September 2, 2020 progress note states that Joan did not know why she was in the hospital and believed that she was “at the place where trains switch cars.” A September 4, 2020 progress note states that Joan “refers to multiple people in the room when that is not the case” and she did not know the year or where she was.

C. SILGJORD’S appointment as Joan’s guardian.

On September 4, 2020, St. Luke’s petitioned the St. Louis County District Court for an order appointing an emergency guardian for Joan. I reviewed filings from the guardianship case as part of my investigation. The Guardianship Petition states, among other things, that Joan needed a guardian because she had “severe memory and orientation deficits which make her unable to make higher level decisions about her medical care.” SILGJORD visited Joan in the hospital and SILGJORD said in a court hearing that a social worker at St. Luke’s asked her to be Joan’s guardian.

By order dated September 11, 2020, SILGJORD was appointed Joan’s emergency guardian. The Guardianship Order noted that Joan’s health, safety, and welfare were at risk, in part, because she had a stroke, continued to be confused, had memory and orientation deficits, and “was unable to make higher level decisions about medical care.” The order also stated that a medical test administered to Joan showed she had severe cognitive deficits.

SILGJORD was not appointed conservator, and a petition was never filed for Joan to have a conservator. The Emergency Letters of Guardianship issued by the court on September 11, 2020 is a check the box form with boxes for guardianship and conservatorship, and only the box for guardianship is checked on this form. SILGJORD received a copy of this document, which also notes that the guardianship was temporary and expired on November 11, 2020.

D. SILGJORD’s recorded bedside conversations with Joan.

SILGJORD recorded several conversations that she had with Joan at St. Luke’s. I obtained and reviewed these recordings as part of my investigation. For instance, I reviewed a recorded conversation that SILGJORD claimed to have had with Joan on September 23, 2020. During this conversation, Joan said she did not know where she was, did not know her maiden name, did not know her father’s name, and did not remember how old her son was when he died. SILGJORD also showed Joan a photograph of Joan when she was younger, but Joan said that she did not recognize herself in the photograph. During this conversation, SILGJORD told Joan that she was her “new grandma” and that she loved Joan. Joan told SILGJORD that she loved her also and that she wanted to take care of SILGJORD.

I reviewed another recorded conversation that SILGJORD claimed to have had with Joan on September 30, 2020. During this conversation, Joan also told SILGJORD that she “loved” SILGJORD and wanted to take care of SILGJORD and her family. As noted earlier, hospital and court records show that Joan was confused and had severe memory and cognitive deficits when SILGJORD made these bedside recordings. An October 2, 2020 progress note from St. Luke’s states that Joan was “tearful this [morning] and asking for her mother.” An October 4, 2020 progress note states that Joan was “asking for her mom and dad.” An October 8, 2020 progress note states, “patient restless this morning. Hallucinating.” An October 10, 2020 progress note states, “patient is still very confused. Has been hallucinating.”

E. Without legal authority SILGJORD acquired control of Joan’s bank accounts.

As noted earlier, SILGJORD was not appointed Joan’s conservator, and the guardianship court order did

not authorize SILGJORD to take control over Joan's bank accounts. Nevertheless, an employee with Members Cooperative Credit Union (Members Cooperative) told me that on September 21, 2020 SILGJORD provided guardianship paperwork to Members Cooperative and was granted access to Joan's bank accounts. A search warrant was obtained for Joan's bank records. On September 23, 2020, SILGJORD signed a Members Cooperative form titled Fiduciary Accounts Application & Agreement, wherein she represented to the bank that she was Joan's fiduciary and had authority to access Joan's accounts. Joan's bank statement ending September 30, 2020 shows that Joan had three separate accounts at Members Cooperative containing with a combined total of \$43,120.57 at the time SILGJORD gained access to the accounts.

After obtaining access to Joan's bank accounts, SILGJORD transferred tens of thousands of dollars between the accounts. Bank records obtained from Members Cooperative show that SILGJORD wrote a check from Joan's checking account dated October 26, 2020 to Atkin's Funeral Home in the amount of \$6,000 which cleared Joan's account on October 29, 2020. SILGJORD also stated that on November 1, 2020 she used money from Joan's account to pay Joan's power bill.

VII. SILGJORD'S Attempt to Swindle Roger and Joan's Estate.

A. SILGJORD did not notify Roger about Joan's death or cremation.

Records from St. Luke's state that Joan was transferred to hospice on October 21, 2020. A few days later, Joan died at St. Luke's on October 28, 2020 without a will or any surviving children. SILGJORD's first meeting with Joan was 113 days prior to Joan being found on the floor in her home covered in feces and urine, and 177 days prior to Joan's death. SILGJORD was Joan's guardian for a total of 48 days prior to her death.

Roger is listed as Joan's husband on Joan's death certificate, which lists Joan's cause of death as stroke and vascular dementia. As noted earlier, Roger and Joan were married in 1976, had been separated since 2013, but never divorced.

Records from St. Luke's contained conflicting information about Joan's marital status. A September 28, 2020 St. Luke's record states that Joan has a "living, estranged husband." However, an October 19, 2020 progress note states that Joan "was married," and her "ex-husband was abusive." Nevertheless, Joan and Roger were married when Joan died.

SILGJORD did not notify Roger about Joan's death. Roger said in his complaint to the Cloquet PD that he learned about Joan's death from seeing her obituary in the newspaper. Roger also said that he first heard about SILGJORD when the funeral home informed him that SILGJORD was taking care of Joan's arrangements.

B. SILGJORD lied to Roger about her legal authority over Joan and Joan's estate and refused to give Roger access to Joan's property.

As noted earlier, under Minnesota law guardianship terminates upon the death of the incapacitated person. Under Minnesota law, a will is necessary if a person wants to leave property to a friend or a charity, to give certain items to certain people, or to leave someone out who would otherwise inherit from them. Minnesota law also provides that if a married person dies without a will and without surviving children, their entire estate goes to their surviving spouse, subject to limited exceptions. SILGJORD's guardianship expired upon Joan's death on October 28, 2020, and Roger was entitled to receive the entirety of Joan's estate other than property that Joan may have owned jointly with others.

In the month after Joan's death, and after learning from the funeral home that SILGJORD was involved with

his wife, Roger met with SILGJORD at a Perkins restaurant. SILGJORD recorded this meeting. At the outset of the meeting SILGJORD informed Roger that she was a police officer. Roger asked SILGJORD whether the guardianship had ended now that Joan was dead. In response, SILGJORD said that she was "in charge" and ensuring that Joan's wishes were being carried out. SILGJORD did not tell Roger that the guardianship had ended.

Roger also asked SILGJORD for the keys to Joan's home. Later in the conversation, SILGJORD said that she had the keys to Joan's house. Roger told SILGJORD that he was going to submit paperwork to get access to Joan's bank accounts and asked SILGJORD whether this could be done. SILGJORD responded, "probably not because I am on the account," but added that she was willing to work with Roger.

On November 24, 2020, Roger went to Joan's house where he encountered SILGJORD. SILGJORD recorded their interactions. Roger again asked SILGJORD for a key to the house. SILGJORD refused and said that she would not give him a key "until the courts make me sign it over." In an effort to prevent Roger from taking control over the property of his late wife, SILGJORD told Roger, "I have guardianship and conservatorship," and "until the courts release me I am still on the guardianship and conservatorship paperwork." As noted earlier, SILGJORD's guardianship expired upon Joan's death and she was never appointed conservator. During this encounter, SILGJORD also threatened to call the police to have Roger removed from his wife's home and alleged that Roger had committed a crime by taking a laptop computer that belonged to Joan from the home.

C. SILGJORD attempted to obtain excessive fees for her guardianship tasks and compensation for time she did not spend on guardianship tasks.

On December 18, 2020, SILGJORD filed a petition in Carlton County District Court seeking to be appointed personal representative of Joan's estate. In her petition, SILGJORD claimed that Joan's estate was indebted to SILGJORD for guardianship expenses in the amount of \$7,454. SILGJORD met Joan for the first time just 199 days prior to petitioning to become personal representative.

An evidentiary hearing was held in the probate case on October 28, 2021 in Carlton County District Court (the probate hearing). As part of my investigation, I reviewed the court filings, and both attended and obtained the transcript from the probate hearing. Filings and testimony from that hearing show that SILGJORD sought excessive fees and exaggerated the time she spent on guardianship tasks. Before filing the petition, SILGJORD was told by Roger's attorney that \$20 per hour was a "good average hourly rate" for guardianship services. SILGJORD, however, petitioned Joan's estate for reimbursement at a rate of \$50 per hour. SILGJORD testified that this was the hourly rate she received from the Cloquet PD for overtime.

SILGJORD created a log detailing the time she allegedly spent on guardianship tasks, and the log was admitted into evidence at the probate hearing. The log shows that SILGJORD sought reimbursement for more time than she actually spent on guardianship tasks. For example, SILGJORD watched a video for guardianship training on September 11, 2020. The video was 34 minutes and 5 seconds long, but SILGJORD sought reimbursement from Joan's estate for one hour of time.

SILGJORD also sought reimbursement for one hour of guardianship for phone calls that lasted just a few minutes. On November 4, 2020, SILGJORD had a phone call with Roger that lasted 9 minutes and 28 seconds. On November 10, 2020, SILGJORD had a phone call with Roger that lasted 4 minutes and 38 seconds. On November 23, 2020, SILGJORD had a phone call with Roger that lasted 2 minutes and 3 seconds. SILGJORD sought reimbursement from Joan's estate for one hour of time at the rate of \$50 per hour for each one of these three short calls.

D. SILGJORD attempted to obtain compensation from Joan's estate for tasks for which she had already been compensated by the Cloquet PD.

A comparison of SILGJORD's time records from the Cloquet PD with her guardianship log shows that SILGJORD sought guardianship compensation for tasks for which she had already been paid by the Cloquet PD. For example, SILGJORD's Cloquet PD timesheet shows she was on duty from 6:00 pm on September 3 until 6:00 am on September 4, 2020. SILGJORD created a call-for-service log entry timestamped from 6:02 pm until 6:21 pm on September 3 that states: "Checking on residence of Joan Arney, in hospital and asking for assistance in feeding cat and attempt to secure the house." Silgjord made an entry in her guardianship log where she sought compensation for one hour of time on September 3, 2020, stating "checked the residence and fed cat's [sic]."

SILGJORD's Cloquet PD timesheet shows that she was on duty from 6:00 am to 6:00 pm on September 11, 2020. SILGJORD attended a court hearing via zoom that day at 9:45 am on the petition to appoint SILGJORD as Joan's guardian. SILGJORD's Cloquet PD timesheet reflects that she was paid 12 hours for this date, and it does not show any reduction for the time she missed to attend the hearing. SILGJORD made an entry in her guardianship log where she sought compensation for one hour of time on for September 11, 2020. She wrote, "Guardianship Hearing."

SILGJORD's Cloquet PD timesheets include a breakdown of "paid time off," including sick leave and vacation time. SILGJORD used 12 hours of sick leave on October 28, 2020, the day Joan died. SILGJORD made an entry in her guardianship log where she sought compensation for 12 hours on October 28, 2020. She wrote, "Missed work due to Joan's Death [sic]."

SILGJORD's Cloquet PD timesheet shows she was on duty from 6:00 am until 6:00 pm on November 15, 2020. SILGJORD created a call-for-service log entry timestamped from 7:59 am until 8:01 am for checking Joan's house and shoveling the sidewalks. SILGJORD made an entry in her guardianship log where she sought compensation for 1 hour on November 15, 2020. She wrote, "Shoveled [sic] sidewalks, fed cats, and took photo's [sic] of house."

E. SILGJORD attempted to obtain all of the assets from Joan's estate.

In addition to the false and excessive guardianship fees, court records show that SILGJORD attempted to obtain an additional \$158,213.28 from Joan's estate. On January 28, 2021 SILGJORD filed a claim against Joan's estate in the amount of \$71,601.58, which she estimated to be the estate's total value. In describing her claim, SILGJORD wrote "Prior to Joan's death she told me she loved me & wanted to take care of me & my family. I was Joan's friend & court appointed guardian."

On March 9, 2021, SILGJORD filed a second claim seeking an additional \$86,611.70 from Joan's estate. This sum represented the amount of money Joan was set to inherit from her late stepmother's estate. In describing this claim SILGJORD wrote, "I was Joan's court appointed guardian & took care of her prior to her death. There is no formal will but Joan told me & my husband she loved us and wanted to take care of us. I have this recorded on my cell phone."

SILGJORD filed a letter with the court dated January 27, 2021 outlining her reasons why the estate should be awarded to her as opposed to Roger, including her belief that it was "in Joan's best interest to donate the proceeds of her estate to build a dog park or community garden in her honor." SILGJORD offered the recordings she made of Joan, when Joan was incapacitated in the few weeks prior to her death, at the probate hearing in an attempt to achieve her objectives in relation to Joan's estate. As noted earlier, SILGJORD also referenced the recordings on her petition seeking to obtain Joan's inheritance.

By order dated April 29, 2022, the probate court granted SILGJORD \$1,000 as compensation for being Joan's guardian and \$259 as reimbursement for expenses she incurred for cleaning Joan's house and shoveling the snow. In all other respects, SILGJORD's claims for guardianship compensation and for money from Joan's estate were denied. The court found that SILGJORD's guardianship rate of \$50 per hour was "unreasonable," and that the 138 hours of guardianship tasks that SILGJORD alleged to have completed was likewise "unreasonable."

SILGJORD'S employment with Cloquet PD ended on June 7, 2022. I attempted to interview SILGJORD, but she refused to speak with me.

VIII. Conclusion

In the months leading up to her death, Joan had a severely diminished capacity. SILGJORD financially exploited Joan by using her position as a police officer and guardian of Joan to obtain control of Joan's bank accounts in the absence of legal authority to do so.

In addition, SILGJORD attempted to exploit Joan and swindle Roger and Joan's estate. SILGJORD used her position as guardian of Joan to make bedside recordings of Joan in the weeks before her death, while Joan was incapacitated. SILGJORD then lied to Roger about her legal authority over Joan and Joan's estate and sought to obtain inflated fees and compensation from Joan's estate for tasks for which she had already been paid by the Cloquet PD. SILGJORD also attempted to obtain Joan's entire estate, and used the opportunistic bedside recordings she made of Joan while Joan was incapacitated to try to achieve this goal.

[1] For clarity, and because they have the same last name, Joan Arney and Roger Arney are referred to herein by their first names.

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

Diane Castro
Investigative Auditor
445 Minnesota Street
Suite 1400
St. Paul, MN 55101
Badge: 031017-38

Electronically Signed:
07/20/2023 12:36 PM
Ramsey County, Minnesota

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

Prosecuting Attorney

James H. Clark III
Assistant Attorney General
445 Minnesota Street
Suite 1400
St. Paul, MN 55101
(651) 297-1075

Electronically Signed:
07/20/2023 12:27 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: \$
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: July 21, 2023.

Judicial Officer

Amy Lukasavitz

Electronically Signed: 07/21/2023 07:28 AM

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

**COUNTY OF CARLTON
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Laci Marie silgjord

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:

09-CR-23-1226
DEFENDANT FACT SHEET

Filed in District Court
State of Minnesota
7/21/2023

Name: Laci Marie silgjord
DOB: 03/02/1988
Address: 3419 Riviera Road
Sartell, MN 56337

Alias Names/DOB:

SID:

Height:

Weight:

Eye Color:

Hair Color:

Gender:

FEMALE

Race:

Fingerprints Required per Statute:

Yes

Fingerprint match to Criminal History Record:

No

Driver's License #:

Case Scheduling Information:

Prosecutor unavailable for first appearance on the following dates: 8/3,
8/7-8/11, 8/15, 9/1-9/5

Alcohol Concentration:



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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	9/21/2020	609.2335.1(2)(i) Financial Exploitation-Vulnerable Adult-Undue Influence/Harassment/Duress	Felony	U1701		MN062015A	20200124
	Penalty	9/21/2020	609.52.3(1) Theft - Firearm or property value over \$35,000	Felony	U1701		MN062015A	20200124
2	Charge	9/21/2020	609.2335.1(2)(iii) Financial Exploitation-Vulnerable Adult-Establish Fiduciary Obligation by Duress/Force/Coercion/Other	Gross Misdemeanor	U2700		MN062015A	20200124
	Penalty	9/21/2020	609.2335.3 Financial Exploitation of a Vulnerable Adult-609.2335, subd. 1(2)(ii) or (iii) Penalty. Ref 609.52	Gross Misdemeanor	U2700		MN062015A	20200124
3	Charge	9/21/2020	609.52.2(a)(4) Theft-By Swindle	Felony	U1069		MN062015A	20200124
	Penalty	9/21/2020	609.52.3(1) Theft - Firearm or property value over \$35,000	Felony	U1069		MN062015A	20200124
	Modifier	9/21/2020	609.17.1 Anticipatory Crimes-Attempts	No-Level	U1069		MN062015A	20200124

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