

APPENDIX A TO MINN. R. CRIM. P. 15

**State of Minnesota**

**District Court**

County of
WINONA

Judicial District:	Third
Court File Number:	85-CR-25-771
Case Type:	Criminal

State of Minnesota  
Plaintiff

vs.

**Petition to Enter Plea of Guilty  
in Felony Case Pursuant to Rule 15**

Jennifer Nichole Baechle  
Defendant

TO THE ABOVE-NAMED COURT

I Jennifer Nichole Baechle, Defendant in the above-entitled action, do respectfully represent and state as follows:

1. My full name is Jennifer Nichole Baechle. I am 44 years old, my date of birth is March 29, 1982. The last grade that I went through in school is Twelfth Grade.
2. If filed in my case, I have received, read and discussed a copy of the Complaint.
3. I understand the charge(s) made against me in this case.
4. Specifically, I understand that I have been charged with the crime(s) of Second Degree Manslaughter-Commit Violation of M.S. 609.378.  
-M.S. Sec. 609.205(5)  
and  
Second Degree Manslaughter-Culpable Negligence Create Unreasonable Risk.  
-M.S. Sec. 609.205(1)  
committed on or about September 5, 2011 in Winona County,  
Minnesota.
5. I am represented by two attorneys whose names are Kurt J. Knuesel and David R. Lundgren and:
  - a. I feel that I have had sufficient time to discuss my case with my attorneys.
  - b. I am satisfied that my attorneys are fully informed as to the facts of this case.
  - c. My attorneys have discussed possible defenses to the crime that I might have.
  - d. I am satisfied that my attorneys have represented my interests and has fully advised me.

6. I  have /  have never been a patient in a mental hospital.
7. I  have /  have not talked with or been treated by a psychiatrist or other person for a nervous or mental condition.
8. I  have /  have not been ill recently.
9. I  have /  have not recently been taking pills or other medicines.
10. I  do /  do not make the claim that I was so drunk or so under the influence of drugs or medicine that I did not know what I was doing at the time of the crime.
11. I  do /  do not make the claim that I was acting in self-defense or merely protecting myself or others at the time of the crime.
12. I do not make the claim that the fact I have been held in jail since my arrest and could not post bail caused me to decide to plead guilty in order to get the thing over with rather than waiting for my turn at trial.
13. I was represented by an attorney when I had a probable cause hearing. I understand that my probable cause motion is currently pending. I understand that:
  - a. I have moved that the complaint against me be dismissed for lack of probable cause and I know that if I go ahead with entering my plea of guilty, I waive all right to successfully object to the absence of a probable cause hearing as raised in my probable cause motion.
  - b. I waive all right to successfully object to any errors in the probable cause hearing when I enter my plea of guilty.
14. My attorney has told me and I understand:
  - a. That the prosecutor for the case against me, has:
    - i. physical evidence obtained as a result of searching for and seizing the evidence;
    - ii. evidence in the form of statements, oral or written that I made to police or others regarding this crime;
    - iii. evidence discovered as a result of my statements or as a result of the evidence seized in a search;
    - iv. identification evidence from a line-up or photographic identification;
    - v. evidence the prosecution believes indicates that I committed one or more other crimes.
  - b. That I have a right to a pre-trial hearing before a judge to determine whether or not the evidence the prosecution has could be used against me if I went to trial in this case.
  - c. That if I requested such a pre-trial hearing I could testify at the hearing if I wanted to, but my testimony could not be used as substantive evidence against me if I went to trial and could only be used against me if I was charged with the crime of perjury. (Perjury means testifying falsely).
  - d. That I do not now request such a pre-trial hearing and I specifically do now waive my right to have such a pre-trial hearing.
  - e. That whether or not I have had such a hearing I will not be able to object tomorrow or any other time to the evidence that the prosecutor has.

15. I have been told by my attorneys and I understand:
- That if I wish to plead not guilty I am entitled to a trial by a jury on the issue of guilt, and all jurors would have to agree I was guilty before the jury could find me guilty.
  - That if I plead guilty I will not have a trial by either a jury or by a judge without a jury.
  - That with knowledge of my right to a trial on the issue of guilt, I now waive my right to a trial.
16. I have been told by my attorneys, and I understand that if I wish to plead not guilty and have a trial by jury or trial by a judge I would be presumed innocent until my guilt is proved beyond a reasonable doubt.
17. I have been told by my attorneys and understand that:
- If I wish to plead not guilty and have a trial the prosecutor would be required to have the witnesses testify against me in open court in my presence and that I would have the right, through my attorney, to question these witnesses.
  - With knowledge of my right to have the prosecution's witnesses testify in open court in my presence and questioned by my attorney, I now waive this right.
18. I have been told by my attorneys and I understand that:
- If I wish to plead not guilty and have a trial I would be entitled to require any witnesses that I think are favorable to me to appear and testify at trial.
  - With knowledge of my right to require favorable witnesses to appear and testify at trial I now waive this right.
19. I have been told by my attorneys and I understand that:
- A person who has prior convictions or a prior conviction can be given a longer prison term because of this.
  - The maximum penalty that the court could impose for this crime (taking into consideration any prior conviction or convictions) is imprisonment for Ten (10) years. That if a minimum sentence is required by statute the court may impose a sentence of imprisonment of not less than \_ months for this crime.
  - For felony driving while impaired offenses and most sex offenses, a mandatory period of conditional release will follow any executed prison sentence that is imposed. Violating the terms of this conditional release may increase the time I serve in prison. In this case, the period of conditional release is N/A years.
  - A person who participates in a crime by intentionally aiding, advising, counseling and conspiring with another person or persons to commit a crime is just as guilty of that crime as the person or persons who are present and participating in the crime when it is actually committed.
  - My present probation or parole could be revoked because of the plea of guilty to this crime.
  - The prosecutor was seeking an aggravated sentence, but has since agreed to the disposition described in Exhibit A.

20. I have been told by my attorneys and understand that:
- a. My attorneys discussed this case with the prosecuting attorneys and that my attorneys and the prosecuting attorneys agreed that if I entered a plea of guilty, the prosecutors will do the following: \_\_\_\_\_  
\_\_\_\_\_  
See Attached Exhibit A  
\_\_\_\_\_
  - b. If the court does not approve this agreement:
    - i. I have an absolute right to then withdraw my plea of guilty and have a trial.
    - ii. Any testimony that I have given concerning the guilty plea could not be used against me unless I am charged with the crime of perjury based on this testimony.
21. That except for the agreement between my attorneys and the prosecuting attorneys:
- a. No one – including my attorneys, any police officer, prosecutor, judge, or any other person - has made any promises to me, to any member of my family, to any of my friends or other persons, in order to obtain a plea of guilty from me.
  - b. No one – including my attorneys, any police officer, prosecutor or judge, or any other person – has threatened me, or any member of my family or my friends or other persons, in order to obtain a plea of guilty from me.
22. My attorneys have told me, and I understand that if my plea of guilty is for any reason not accepted by the court, or if I withdraw the plea with the court's approval, or if the plea is withdrawn by court order on appeal or other review:
- a. I would then stand trial on the original charge(s).
  - b. The prosecution could proceed against me just as if there had been no plea of guilty and no plea agreement.
23. My attorneys have told me and I understand that if my plea of guilty is accepted by the judge I have the right to appeal, but that any appeal or other court action I may take claiming error in the proceedings probably would be useless and a waste of my time and the court's.
24. My attorneys have told me, and I understand that a judge will not accept a plea of guilty for anyone who claims to be innocent.
25. I now make no claim that I am innocent.
26. I have been told by my attorneys, and I understand that if I wish to plead not guilty and have a jury trial:
- a. I could testify at trial if I wanted to but I could not be forced to testify.
  - b. If I decided not to testify neither the prosecutor nor the judge could comment on my failure to testify.
  - c. With knowledge of my right not to testify and that neither the judge nor the prosecutor could comment on my failure to testify at trial I now waive (give up) this right and I will tell the judge the facts of the crime.
27. My attorneys have told me, and I understand that if I am not a citizen of the United States this plea of guilty may result in deportation, exclusion from admission to the United States of America or denial of citizenship.

28. That in view of all above facts and considerations I wish to enter a plea of guilty to the offense(s) of Interference With a Dead Body-A Gross Misdemeanor in violation of M.S. Section 609.502, Subd. 1.(2011)

Dated: 5/5/2026

J. N. Baechle  
Signature

Name: Jennifer N. Baechle

Street Address: 79 West 5<sup>th</sup> Street

City/State/Zip: Winona, MN 55987



MINNESOTA  
JUDICIAL  
BRANCH

## EXHIBIT A

- **Plead Guilty to one count of Gross Misdemeanor Interference with a Dead Body, in violation of Minn. Stat. Sec. 609.502.1(2011).**
  - **I agree to waive any protection under the Statute of Limitations (M.S. Sec. 628.26) in order to facilitate this plea.**
- **Balance Dismissed (It is the intention of the parties that this agreement, if accepted by the Court, would preclude the State from further prosecution of Defendant for any crimes related to the discovery of a deceased infant in the Mississippi River near Winona, MN on September 5, 2011, including but not limited to the manslaughter charges contained in the Complaint).**
- **Stay of imposition for two (2) years.**
- **Supervised probation.**
- **Provide a full and complete factual basis in open court and in conjunction with a plea hearing.**
- **Complete forty (40) hours of community work service within one (1) year.**
- **No probationary jail.**
- **No restitution.**
- **Remain Law Abiding, No same or similar offenses.**
- **Fine left to discretion of the Court following arguments of counsel.**

### **Standard Probation Conditions**

- **Follow all State and Federal criminal laws.**
- **Contact your probation officer as directed.**
- **Sign a probation agreement within 14 days or as directed by agent.**
- **Tell your probation officer within 72 hours if you have contact with law enforcement.**
- **Tell your probation officer within 72 hours if you are charged with any new crime.**
- **Tell your probation officer within 72 hours if you change your address, employment, or telephone number.**
- **Cooperate with the search of your person, residence, vehicle, workplace, property, and things as directed by your probation officer.**
- **Sign releases of information as directed.**