

State of Minnesota
County of Nobles

District Court
5th Judicial District

Prosecutor File No. 18CR00465
Court File No. 53-CR-18-547

State of Minnesota,

Plaintiff,

vs.

RICHARD DAVID BRUNS DOB: 07/20/1974

28 Oklahoma Avenue
Adrian, MN 56110

Defendant.

COMPLAINT

Order of Detention

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: Assault-2nd Degree-Dangerous Weapon

Minnesota Statute: 609.222.1, with reference to: 609.222.1

Maximum Sentence: 7 years in prison, a \$14,000 fine, or both

Offense Level: Felony

Offense Date (on or about): 06/15/2018

Control #(ICR#): 18003770

Charge Description: That on or about 6/15/2018, in Nobles County, Minnesota, the defendant, Richard David Bruns, DOB: 7/20/1974 (43), assaulted another with a dangerous weapon, to-wit: Dolly Amanda Bruns.

COUNT II

Charge: Threats of Violence - intent to terrorize

Minnesota Statute: 609.713.1, with reference to: 609.713.1

Maximum Sentence: 5 years imprisonment and \$10,000 fine

Offense Level: Felony

Offense Date (on or about): 06/15/2018

Control #(ICR#): 18003770

Charge Description: That on or about 6/15/2018, in Nobles County, Minnesota, the defendant, Richard David Bruns, DOB: 7/20/1974 (43), threatened, directly or indirectly, to commit any crime of violence with purpose to terrorize another or to cause evacuation of a building, place of assembly, vehicle or facility of public transportation or otherwise to cause serious public inconvenience, or in a reckless disregard of the risk of causing such terror or inconvenience.

COUNT III

Charge: Domestic Assault-Misdemeanor-Commits Act to Cause Fear of Immediate Bodily Harm or Death

Minnesota Statute: 609.2242.1(1), with reference to: 609.2242.1(1)

Maximum Sentence: 90 Days in Jail and/or \$1,000 Fine

Offense Level: Misdemeanor

Offense Date (on or about): 06/15/2018

Control #(ICR#): 18003770

Charge Description: That on or about 6/15/2018, in Nobles County, Minnesota, the defendant, Richard David Bruns, DOB: 7/20/1974 (43), committed an act with intent to cause fear in another of immediate bodily harm or death against a family or household member as defined by Minn. Stat. 518B.01 subd. 2 (b), to-wit: Dolly Amanda Bruns.

COUNT IV**Charge: Domestic Assault-Misdemeanor-Commits Act to Cause Fear of Immediate Bodily Harm or Death**

Minnesota Statute: 609.2242.1(1), with reference to: 609.2242.1(1)

Maximum Sentence: 90 Days in Jail and/or \$1,000 Fine

Offense Level: Misdemeanor

Offense Date (on or about): 06/15/2018

Control #(ICR#): 18003770

Charge Description: That on or about 6/15/2018, in Nobles County, Minnesota, the defendant, Richard David Bruns, DOB: 7/20/1974 (43), committed an act with intent to cause fear in another of immediate bodily harm or death against a family or household member as defined by Minn. Stat. 518B.01 subd. 2 (b), to-wit: The defendant's twelve-year-old son.

The Complainant states that the following facts establish probable cause:

The complainant, a licensed peace officer in the state of Minnesota, is aware of the following through the complainant's own investigation and experience and that of fellow peace officers.

On June 15, 2018, Nobles County Deputies were dispatched to a residence in Adrian, Minnesota in Nobles County to investigate a report of threats of violence. Sergeant Ryan Kruger arrived on scene and met Adrian Police Chief Shawn Langseth in the driveway of the home with Richard Bruns (DOB: 7/20/1974). Kruger met with the victim, Dolly Bruns, at the house across the street. The victim was upset and crying.

The victim told Kruger that she and her husband, Bruns, had been drinking earlier that evening. She believed she had three beers and that Bruns had consumed eight beers. She said that when she got home, Richard Bruns was "snippy" with her and their two kids and that they had been arguing both inside and outside of the house.

When Bruns came back inside the house, the victim stated that he was "raging mad". Richard Bruns then asked her and his 12-year-old son to fight him. Their son then "smarted off" to Bruns and he ran after him. The victim said that she heard a loud noise come from the front porch and then she heard her son crying.

The victim then ran over to her son and Bruns met her in the doorway and began pushing her and bumping into her with his chest or stomach. The victim's daughter then came into the room and the victim told her to run across the street to her grandmother's house and call 911.

The victim stated that after the kids left, she and Bruns continued to argue. Bruns told the victim to call her mother and tell her not to call 911. The victim told Bruns it was too late and that the call was already made.

The victim was hesitant to tell Kruger more about what happened because she was worried about Bruns losing the income from his job and health insurance. However, the victim eventually revealed that the entire incident was audio-recorded on her cell phone.

Kruger and Muehe listened to the recording. They overheard Bruns yelling, swearing and screaming at his wife and children. Several minutes into the recording, Bruns told the victim to "stop the phone call", referring to the 911 call.

The victim repeatedly stated words to the effect that it had already been done. Kruger could then overhear what he believed to be the sound of keys and door opening. Kruger believed it to be the sound of a gun safe being opened.

At that point, the victim's tone changed from attempting to calm Bruns to being panicked. The victim can be overheard saying "oh my god" and repeatedly yelling at Bruns to put his gun away and get it away from her. Bruns refused, stating that if he was going to go to jail he was going to "earn it". Bruns further stated "cops come knocking on my door you're dead" and repeated words to that effect. At another point Bruns stated: "all they have to do is coming banging on the door and 'boom-boom'" to illustrate what would happen if the cops arrived.

At other points during the recording the victim can be overheard pleading and crying that she did not want

to die and begging Bruns to put away the gun. Bruns stated several times that the victim should "make the phone call" in a manner that suggested that was the only way the victim was going to avoid consequences.

6/18/2019 11:00:23 AM
Nobles County, MN

After further pleas from the victim, Bruns can be overheard shutting and locking a door that was believed to be the door to the gun safe. At that point, the victim's pleas stopped and Bruns can be overheard leaving the immediate area of the recording. The officers believed that was when Bruns re-locked his handgun into a gun safe.

Later, Bruns was interviewed by Kruger after receiving his Miranda warning. Bruns admitted that he and the victim had been having issues for a long time. Bruns admitted to opening his gun safe but stated he did not know if he took out a handgun. Bruns stated the victim probably saw the gun. Bruns stated that he had gone too far in this incident. He later stated that he did grab the gun but did not think he pointed it at the victim. Bruns later stated he did not know why he took the gun out.

Kruger and Muehe located and seized multiple firearms from the home, including handguns, a rifle, and a shotgun. A lockbox-style gun safe was also located in the home that held two handguns and two loaded magazines.

Kruger and Deputy Ryan Muehe later met with the 12-year-old male. The juvenile corroborated what the victim had stated up until the point that he had left the home. The juvenile said that Bruns had chased after him and his younger sister came down the stairs crying. He further stated that Bruns never actually touched him and he was able to run out of the house.

NOTICE: You are hereby notified that failure to appear for court when required to do so is a criminal offense in the State of Minnesota, pursuant to Minn. Stat. 609.49. If you are charged with or have been convicted of a felony offense, an intentional failure to appear for a court appearance is a felony offense, which is punishable by one-half the statutory maximum term of imprisonment, fine, or both for the underlying crime for which you fail to appear and is to be no less than one (1) year and one (1) day in prison, a \$1,500.00 fine, or both, pursuant to Minn. Stat. 609.49, Subd. 1(a). If you are charged with a gross misdemeanor or misdemeanor offense, an intentional failure to appear for trial is a misdemeanor offense and may be punished by imprisonment for up to ninety (90) days in jail, a \$1,000.00 fine, or both, pursuant to Minn. Stat. 609.49, Subd. 2. If convicted of Failure to Appear, you may also be ordered to pay costs incurred by the prosecuting agency or governmental authority due to your failure to appear.

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

Chris Dybevic
Chief Deputy
1530 Airport Road
Suite 100
Worthington, MN 56187
Badge: 5301

Electronically Signed:
06/18/2018 11:20 AM
Nobles County, Minnesota

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

Prosecuting Attorney

Adam E. Johnson
Assistant Nobles County
Attorney
1530 Airport Road
Suite 400, PO Box 337
Worthington, MN 56187
(507) 295-5298

Electronically Signed:
06/18/2018 11:14 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 on _____, _____ at _____ AM/PM before the above-named court at 1530 Airport Road P.O. Box 547, Worthington, MN 56187 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: Bail Study Required

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: June 18, 2018.

Judicial Officer

Gordon L Moore III
Judge of District Court

Electronically Signed: 06/18/2018 11:35 AM

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

**COUNTY OF NOBLES
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Richard David Bruns

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:

53-CR-18-547
DEFENDANT FACT SHEET

Filed in Fifth Judicial District Court
6/18/2018 11:39:23 AM
Nobles County, MN

Name: Richard David Bruns
DOB: 07/20/1974
Address: 28 Oklahoma Avenue
Adrian, MN 56110

Alias Names/DOB:

SID: MN18AX0619

Height:

Weight:

Eye Color:

Hair Color:

Gender: MALE

Race:

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: Yes

Driver's License #:

Alcohol Concentration:

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	6/15/2018	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2521	N	MN0530000	18003770
	Penalty	6/15/2018	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2521	N	MN0530000	18003770
2	Charge	6/15/2018	609.713.1 Terroristic Threats-Reckless Disregard Risk	Felony	A9B21	N	MN0530000	18003770
	Penalty	6/15/2018	609.713.1 Terroristic Threats-Reckless Disregard Risk	Felony	A9B21	N	MN0530000	18003770
3	Charge	6/15/2018	609.2242.1(1) Domestic Assault-Misdemeanor-Commits Act to Cause Fear of Immediate Bodily Harm or Death	Misdemeanor	AL451	N	MN0530000	18003770
	Penalty	6/15/2018	609.2242.1(1) Domestic Assault-Misdemeanor-Commits Act to Cause Fear of Immediate Bodily Harm or Death	Misdemeanor	AL451	N	MN0530000	18003770
4	Charge	6/15/2018	609.2242.1(1) Domestic Assault-Misdemeanor-Commits Act to Cause Fear of Immediate Bodily Harm or Death	Misdemeanor	AL454	N	MN0530000	18003770
	Penalty	6/15/2018	609.2242.1(1) Domestic Assault-Misdemeanor-Commits Act to Cause Fear of Immediate Bodily Harm or Death	Misdemeanor	AL454	N	MN0530000	18003770