

State of Minnesota
County of Blue Earth

District Court
5th Judicial District

Prosecutor File No.
Court File No.

BEC-15-1512
07-CR-15-4989

State of Minnesota,
Plaintiff,

COMPLAINT
Summons

vs.

BILLY JO ROBINSON DOB: 05/26/1960

615 South Oak Avenue
Owatonna, MN 55060

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: Traffic Regulation - Littering-Dangerous Object on Highway

Minnesota Statute: 169.42.1

Maximum Sentence: 90 days and/or \$1,000

Offense Level: Misdemeanor

Offense Date (on or about): 10/22/2015

Control #(ICR#): 15014138

Charge Description: Billy Jo Robinson

On or about October 22, 2015, in the County of Blue Earth, said Defendant Billy Jo Robinson did throw, deposit, place or dump, or cause to be thrown, deposited, placed or dumped upon any street or highway or any public or privately owned land adjacent thereto without the owner's consent any snow, ice, glass bottle, glass, nails, tacks, wire, cans, garbage, swill, papers, ashes, cigarette filters, debris from fireworks, refuse, carcass of any dead animal, offal, trash or rubbish or any other form of offensive matter or any other substance likely to injure any person, animal or vehicle upon such street or highway.

STATEMENT OF PROBABLE CAUSE

On October 22, 2015, Deputy Tom Cusey of the Blue Earth County Sheriff's Office was informed by a complainant that the complainant had found garbage dumped in a ditch near his residence in rural Blue Earth County. The complainant stated that he looked through the items and found a pill bottle with the name of Billy Jo Robinson (D.O.B. 5/26/60) on the pill bottle. The complainant reported finding other items, such as a twin-size bed, exercise equipment, fluorescent lightbulbs, and various other items.

Deputy Cusey attempted to make contact with Robinson and was eventually able to speak to him over the phone. Deputy Cusey informed Robinson of the reason for the contact. Robinson admitted that the items that were located in the ditch in Blue Earth County belonged to his daughter. Robinson stated that there was one bag of items that belonged to him, which was the bag that contained the pill bottle with his name on it. Robinson stated he went to Alexandria, Minnesota, over the weekend with his truck to move his daughter. Robinson stated that his nephew, Aaron Robinson, asked to borrow his truck so Billy Robinson told Aaron Robinson to dispose of the items first and then Aaron Robinson could use the truck.

Billy Robinson stated that he thought Aaron Robinson was going to dispose of the items legally. Billy Robinson claimed that he did not know Aaron Robinson was going to dump the items in the ditch on a township road in Blue Earth County. Deputy Cusey asked for Aaron Robinson's contact information. Billy Robinson stated that he would get back to Deputy Cusey.

Deputy Cusey later contacted Billy Robinson who stated that he was unable to find any contact information for his nephew, Aaron Robinson. Billy Robinson stated that he would take responsibility for the illegal dumping because the items that were illegally dumped belonged to him.

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

Richard Murry
Captain
401 Carver Rd
Mankato, MN 56002-0228
Badge: 2708

Electronically Signed:
12/08/2015 08:58 AM
Blue Earth County, MN

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

Prosecuting Attorney

Steven Kelm
401 Carver Road
PO Box 3129
Mankato, MN 56002
(507) 304-4600

Electronically Signed:
12/07/2015 03:31 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 on **January 7, 2016 at 8:15 AM** before the above-named court at 401 Carver Rd, Mankato, MN 56002-0347 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: December 8, 2015.

Judicial Officer

Krista J Jass
Judge of District Court

Electronically Signed: 12/08/2015 11:15 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.

BILLY JO ROBINSON

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: