

State of Minnesota
County of Blue Earth

District Court
5th Judicial District

Prosecutor File No. 0070114207
Court File No. 07-CR-26-4281

State of Minnesota,

Plaintiff,

vs.

KRISTIN HELEN BOTHUN DOB: 06/09/1972

1405 Squirrels Nest Rd. S.
Kasota, MN 56050

Defendant.

COMPLAINT

Summons

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 - DWI - Operate Motor Vehicle Under Influence of Alcohol

Minnesota Statute: 169A.20.1(1), with reference to: 169A.26.2

Maximum Sentence: 364 days or \$3,000 fine, or both.

Offense Level: Gross Misdemeanor

Offense Date (on or about): 09/06/2026

Control #(ICR#): 26201534

Charge Description: On or about September 6, 2026, in the County of Blue Earth, Minnesota, Kristin Helen Bothun, did drive, operate, or was in physical control of any motor vehicle when he/she was under the influence of alcohol, and one aggravating factor was present when the violation was committed.

COUNT II

Charge: Traffic - DWI - Operate Motor Vehicle - Alcohol Concentration 0.08 Within 2 Hours

Minnesota Statute: 169A.20.1(5), with reference to: 169A.26.2

Maximum Sentence: 364 days or \$3,000 fine, or both

Offense Level: Gross Misdemeanor

Offense Date (on or about): 09/06/2026

Control #(ICR#): 26201534

Charge Description: On or about September 6, 2026, in the County of Blue Earth, Minnesota, Kristin Helen Bothun, did, drive, operate, or was in physical control of any motor vehicle, when his/her alcohol concentration at the time, or as measured within two hours of the time, of driving, operating or being in physical control of the motor vehicle was 0.08 or more, and one aggravating factor was present when the violation was committed.

STATEMENT OF PROBABLE CAUSE

On September 6, 2026, Minnesota State Patrol Trooper Roseberry received a dispatch of a driving complaint on US Highway 14 within Blue Earth County. The complainant, Witness 1, called 911 and stated that there was a white Range Rover vehicle swerving and crossing over lane lines. It was later determined that Kristin Helen Bothun (DOB: 06/09/1972) was the driver of the white Range Rover.

Witness 1 provided Trooper Roseberry, through dispatch, updates on the vehicle's location. At one point, Witness 1 informed them that the vehicle was half of a vehicle width over the lane line while driving on US Highway 14. Trooper Roseberry arrived and he observed the suspect vehicle and Witness 1's vehicle pass by him.

Trooper Roseberry turned around and caught up to the vehicles. While behind Bothun's Range Rover, Trooper Roseberry observed her vehicle cross the fog line with its passenger tires. Trooper Roseberry attempted to initiate a traffic stop. Bothun did not react at first but later turned onto a shoulder and came to a stop.

Trooper Roseberry identified Bothun by her Minnesota Driver's License and noted that he immediately smelled a strong odor of an alcoholic beverage coming from Bothun's person. Bothun could not explain why there was a strong odor of alcohol coming from her person. Trooper Roseberry also observed that Bothun's speech was slow and slurred and that her eyes were watery/glassy and reddened.

Bothun stepped out of the vehicle so that Trooper Roseberry could conduct Standardized Field Sobriety Testing (SFSTs). Throughout the SFSTs, Bothun provided numerous indicators of impairment. As a result, Trooper Roseberry asked Bothun to provide a preliminary breath sample (PBT). Bothun's PBT results indicated a .273 BAC. Bothun admitted to having consumed wine prior to driving.

Bothun was placed under arrest and read the Implied Consent breath test advisory. Bothun was given attorney time and subsequently agreed to take the DMT breath test. Bothun's breath test resulted in a .22BAC. The advisory and test were administered within two hours of her driving conduct.

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

John Perrin
State Patrol Trooper
2171 Bassett Drive
Mankato, MN 56001-6888
Badge: SP8

Electronically Signed:
10/12/2026 10:58 AM
Blue Earth County, Minnesota

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

Prosecuting Attorney

Benjamin R. Chapman
Assistant County Attorney
401 Carver Road
PO Box 3129
Mankato, MN 56002
(507) 304-4600

Electronically Signed:
10/09/2026 12:13 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: October 12, 2026.

Judicial Officer

Bradley C Walker
District Court Judge

Electronically Signed: 10/12/2026 11:45 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.

Kristin Helen Bothun

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: