

State of Minnesota
County of Blue Earth

District Court
5th Judicial District

Prosecutor File No. 0070114096
Court File No. 07-CR-26-3618

State of Minnesota,
Plaintiff,

COMPLAINT
Order of Detention

vs.

KELLI JO BLACK DOB: 03/28/1980

122 N Murphy Street
PO Box 301
Lake Crystal, MN 56055

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: Assault-2nd Degree-Dangerous Weapon

Minnesota Statute: 609.222.1, with reference to: 609.11.4

Maximum Sentence: 7 years or \$14,000 fine or both.

Offense Level: Felony

Offense Date (on or about): 08/30/2026

Control #(ICR#): 26027847

Charge Description: On or about August 30, 2026, in the County of Blue Earth, Minnesota, Kelli Jo Black, did assault another with a dangerous weapon.

COUNT II

Charge: Threats of Violence-Reckless Disregard Risk

Minnesota Statute: 609.713.1

Maximum Sentence: 5 years or \$10,000 fine, or both

Offense Level: Felony

Offense Date (on or about): 08/30/2026

Control #(ICR#): 26027847

Charge Description: On or about August 30, 2026, in the County of Blue Earth, Minnesota, Kelli Jo Black, did, threaten, directly or indirectly, to commit any crime of violence with purpose to terrorize another, or in a reckless disregard of the risk of causing such terror.

COUNT III

Charge: Harassment - Reasonable fear of substantial bodily harm

Minnesota Statute: 609.749.2(b)(1)

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

Offense Level: Gross Misdemeanor

Offense Date (on or about): 08/30/2026

Control #(ICR#): 26027847

Charge Description: On or about August 30, 2026, in the County of Blue Earth, Minnesota, Kelli Jo Black, did, directly or indirectly, or through third parties, manifest a purpose or intent to injure the person, property or rights of another by the commission of an unlawful act, and did place the other person in reasonable fear of substantial bodily harm.

COUNT IV

Charge: Assault-5th Degree-Fear of Bodily Harm or Death

Minnesota Statute: 609.224.1(1)

Maximum Sentence: 90 days or \$1,000 fine, or both.

Offense Level: Misdemeanor

Offense Date (on or about): 08/30/2026

Control #(ICR#): 26027847

Charge Description: On or about August 30, 2026, in the County of Blue Earth, Minnesota, Kelli Jo Black, did commit an act with intent to cause fear in another of immediate bodily harm or death.

COUNT V

Charge: Traffic - Reckless driving; Drives Consciously Disregarding a Substantial or Unjustifiable Risk

Minnesota Statute: 169.13.1(a), with reference to: 169.13.1(c)

Maximum Sentence: 90 days or \$1,000 fine, or both.

Offense Level: Misdemeanor

Offense Date (on or about): 08/30/2026

Control #(ICR#): 26027847

Charge Description: On or about August 30, 2026, in the County of Blue Earth, Minnesota, Kelli Jo Black, did drive any vehicle or light rail transit vehicle while aware of and consciously disregarding a substantial and unjustifiable risk that the driving may result in harm to another or another's property and that risk was of such a nature and degree that disregard of it constituted a significant deviation from the standard of conduct that a reasonable person would observe in the situation.

STATEMENT OF PROBABLE CAUSE

On August 30th, 2026, Detective Lopez of the Mankato Department of Public Safety witnessed a road rage incident that occurred within the City of Mankato. Detective Lopez reported that a Maroon Ford Explorer, operated by Kelli Jo Black (DOB: 03/28/1980), was chasing a red Chevrolet Tahoe on Madison Avenue. Detective Lopez reported that the vehicle operated by Black had been chasing the Tahoe, which was being drove by Victim 1 and also included Victim 2 as a passenger, and that Black had repeatedly swerved at Victim 1 and Victim 2's vehicle on Madison Avenue as the two vehicles were driving, putting Black, Victim 1, Victim 2, and others on the road at risk.

Victim 1 and Victim 2 stopped at Business 1 near Madison Avenue and Detective Lopez reported that Black had also stopped her vehicle at Business 1. Black exited her vehicle with a wooden club or bat in her hands and was advancing toward Victim 1 and Victim 2 in the parking lot. Detective Lopez intervened and told Black to drop the wooden club/bat.

Officer McGuire arrived on scene and spoke with Victim 1 and Victim 2. Victim 1 indicated that he had been in a significant romantic relationship with Black for approximately 6 years and that they have been working through a break-up. Victim 1 confirmed that Black was swerving at his vehicle with her vehicle while driving and that she exited the vehicle with a wooden bat or club. Victim 1 indicated that he believed Black did this because she saw him with another woman in his vehicle.

Victim 2 told Officer McGuire that she did not know Black. Victim 2 also stated that Black pulled up behind them while at Business 2 on Riverfront Drive in Mankato. Victim 2 stated that Black then followed them along Riverfront Drive and on to Madison Avenue. Victim 2 stated that Black swerved at them multiple times and that Victim 2 was afraid during the incident. Victim 2 stated that she initially tried to lock the doors to avoid being harmed because she was afraid and alarmed by Black and her actions.

Victim 2 also told Officer McGuire that she witnessed Black pull out the wooden club or bat once they were in the parking lot of Business 1. Victim 2 stated that when Black was advancing toward Victim 1 and Victim 2 with the wooden bat in her hands, Victim 2 was afraid that Black was going to beat her up or assault Victim 1. Black's actions during the drive and her subsequent actions with the wooden bat in the parking lot caused Victim 2 to be afraid for her safety and of being beat-up or attacked by Black.

Detective Lopez and Officer Christianson spoke with Black. Black admitted to following Victim 1 and Victim 2 and stated that she did it because Victim 1 was harassing her.

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

Jesse Gilbertson
Patrol Sergeant
710 S Front St
Mankato, MN 56001-3803
Badge: 3126

Electronically Signed:
08/31/2026 03:19 PM
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:
08/31/2026 01:53 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: August 31, 2026.

Judicial Officer

Mark Betters
District Court Judge

Electronically Signed: 08/31/2026 03:45 PM

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.

Kelli Jo Black

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: