State of Minnesota
County of Blue Earth

District Court
5th Judicial District

Prosecutor File No. 0070114616
Court File No. 07-CR-26-4820

**State of Minnesota,**

Plaintiff,

vs.

**ETHAN CHARLES WORLEY DOB: 07/14/2006**

400 W Hudson Avenue
Mankato, MN 56001

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: Fleeing a Peace Officer in a Motor Vehicle**
Minnesota Statute: 609.487.3
Maximum Sentence: 3 years and one day or $5,000 fine, or both
Offense Level: Felony

Offense Date (on or about): 10/30/2026

Control #(ICR#): 26035079

Charge Description: On or about October 30, 2026, in the County of Blue Earth, Minnesota, Ethan Charles Worley did by means of a motor vehicle, flee or attempt to flee a peace officer who is acting in the lawful discharge of an official duty, and the perpetrator knows or should reasonably know the same to be a peace officer.

**COUNT II**

**Charge: Traffic - Reckless driving; Drives Consciously Disregarding a Substantial or Unjustifiable Risk**
Minnesota Statute: 169.13.1(a)
Maximum Sentence: 90 days or $1,000 fine, or both.
Offense Level: Misdemeanor

Offense Date (on or about): 10/30/2026

Control #(ICR#): 26035079

Charge Description: On or about October 30, 2026, in the County of Blue Earth, Minnesota, Ethan Charles Worley, 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.

## COUNT III

**Charge: Traffic Regulation - Driver Must Carry Proof of Insurance when Operating Vehicle**
Minnesota Statute: 169.791.2(a)
Maximum Sentence: 90 days or $1,000 fine, or both.
Offense Level: Misdemeanor

Offense Date (on or about): 10/30/2026

Control #(ICR#): 26035079

Charge Description: On or about October 30, 2026, in the County of Blue Earth, Minnesota, Ethan Charles Worley did fail to produce, upon demand of a peace officer, proof of insurance in force at the time of the demand covering the vehicle being operated.

## COUNT IV

**Charge: Drivers' Licenses - Instruction Permit Violation - Under 18 Yrs - Possess Permit 6 Months-B4 Licens**
Minnesota Statute: 171.05.2a, with reference to: 171.241
Maximum Sentence: 90 days or $1,000, or both.
Offense Level: Misdemeanor

Offense Date (on or about): 10/30/2026

Control #(ICR#): 26035079

Charge Description: On or about October 30, 2026, in the County of Blue Earth, Minnesota, Ethan Charles Worley did, while being 18 years of age or more, operated a motor vehicle with an instruction permit and not a Class D driver's license without being accompanied by an adult licensed driver who is actually occupying a seat beside the driver.

## STATEMENT OF PROBABLE CAUSE

On October 30, 2026, at 10:21 PM, Sergeant Wood of the Mankato Department of Public Safety was on routine patrol in the City of Mankato. At that time, Sgt. Wood observed an oncoming vehicle driving without any lights on. Sgt. Wood also noted there was a significant amount of traffic in the area. Sgt. Wood immediately manually activated her squad vehicle's lightbar and conducted a U-turn to pull behind the vehicle. The sole occupant and driver, Ethan Charles Worley (DOB 07/14/2006), pulled to the right and came to a stop. Sgt. Wood exited her squad and began approaching the vehicle. Worley then drove away from the traffic stop. Worley approached an intersection and turned right on red without stopping and failing to yield to westbound traffic that had to stop in order to avoid a collision.

Worley then turned right and came to an abrupt stop. Worley rolled down is window. Sgt. Wood verbally instructed him to stay right there and not to drive away. As Sgt. Wood spoke with Worley, she noted an overwhelming odor consistent with raw marijuana emitting from the interior of the vehicle. Worley provided Sgt. Wood with a Minnesota Instruction Permit. Worley did not have a licensed adult in the vehicle as required by the Permit.

Worley was asked for proof of insurance but could not locate any. Worley called his dad. Worley's dad informed Sgt. Wood he was unaware that Worley had taken the vehicle and that the vehicle did not have any insurance.

Sgt. Wood then asked Worley about the marijuana odor and asked that Worley exit the vehicle. Worley then placed his left hand on the steering wheel and accelerated away from the traffic stop and fled at a high rate of speed, again nearly causing an accident. Sgt. Wood noted Worley was driving at an incredibly dangerous rate of speed and was crossing center and fog lanes to pass other vehicles. Sgt. Wood initially pursued Worley but lost visual of his vehicle. Due to losing visual of Worley and the high traffic in the area, the pursuit was discontinued.

Multiple citizens contacted dispatch to report observing Worley's vehicle traveling at a high rate of speed. On October 31, 2026, at 12:14 AM, Blue Earth County took a report of a vehicle crash near rural Mapleton. The 911 caller that reported that crash indicated an individual named Ethan rolled his car, and he took Ethan to an apartment in Mankato.

Worley could not be located following the incident.

## 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**

Ken Baker
Commander/Patrol Division
710 S Front St
Mankato, MN 56001-3803
Badge: 3144

Electronically Signed:
11/12/2026 11:00 AM
Blue Earth County, Minnesota

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

**Prosecuting Attorney**

Todd Coryell
Assistant County Attorney
401 Carver Road
PO Box 3129
Mankato, MN 56002
(507) 304-4600

Electronically Signed:
11/12/2026 10:43 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).

## [X] 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: November 12, 2026.

**Judicial Officer** Mark Betters
District Court Judge

Electronically Signed: 11/12/2026 12:16 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.

**Ethan Charles Worley**

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: