

State of Minnesota
County of Blue Earth

District Court
5th Judicial District

Prosecutor File No. 0070114122
Court File No. 07-CR-26-3926

State of Minnesota,
Plaintiff,

COMPLAINT
Summons

vs.

RICHARD LEE HOLSTON JR DOB: 10/20/1979

435 Van Buren Avenue #1
St Paul, MN 55103

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: Burglary-2nd Deg-Building-Possess Tool

Minnesota Statute: 609.582.2(a)(4)

Maximum Sentence: 10 years or \$20,000 or both

Offense Level: Felony

Offense Date (on or about): 08/06/2026

Control #(ICR#): 26024718

Charge Description: On or about August 6, 2026, in the County of Blue Earth, Minnesota, Richard Lee Holston Jr did enter a building without consent and with intent to commit a crime, or entered a building without consent and committed a crime while in the building, either directly or as an accomplice and the burglar, when entering or while in the building, possessed a tool to gain access to money or property.

COUNT II

Charge: Theft-Take/Use/Transfer Movable Prop-No Consent

Minnesota Statute: 609.52.2(a)(1), with reference to: 609.52.3(2)

Maximum Sentence: 10 years or \$20,000, or both

Offense Level: Felony

Offense Date (on or about): 08/06/2026

Control #(ICR#): 26024718

Charge Description: On or about August 6, 2026, in the County of Blue Earth, Minnesota, Richard Lee Holston Jr, did, intentionally and without claim of right take, use, transfer, conceal or retain possession of the movable property of another without the other's consent and with intent to deprive the owner permanently of possession of the property and the value of the property or services stolen exceeded \$5,000.00.

COUNT III

Charge: Possession of Burglary or Theft Tools

Minnesota Statute: 609.59

Maximum Sentence: 3 years or \$5,000 fine, or both

Offense Level: Felony

Offense Date (on or about): 08/06/2026

Control #(ICR#): 26024718

Charge Description: On or about August 6, 2026, in the County of Blue Earth, Minnesota, Richard Lee Holston Jr did have in his/her possession any device, explosive, or other instrumentality with intent to use or permit the use of the same to commit burglary or theft.

COUNT IV

Charge: Damage to Property - 3rd Degree - Reduce Value \$501-\$1000

Minnesota Statute: 609.595.2(a)(1)

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

Offense Level: Gross Misdemeanor

Offense Date (on or about): 08/06/2026

Control #(ICR#): 26024718

Charge Description: On or about August 6, 2026, in the County of Blue Earth, said Defendant, Richard Lee Holston Jr., did intentionally cause damage to another person's physical property without the other person's consent, and the damage reduced the value of the property by more than \$500.00 but no more than \$1,000.00 as measured by the cost of repair and replacement.

STATEMENT OF PROBABLE CAUSE

On August 6, 2026, officers from the Mankato Department of Public Safety responded to a report of a burglary at a business, Business 1, within the City of Mankato. The complainant, Witness 1, reported that Business 1 had been broken into with the front door's glass having been broken out of it.

Officer McClinton arrived at Business 1 and spoke with Witness 1. Witness 1 stated that he arrived to open up the store for the day and found that it had been broken into. Witness 1 reported that a large amount of cash had been taken from the cash till and that a safe with money inside of it had also been stolen. The owner of Business 1, Witness 2, arrived and spoke with Officer McClinton.

Witness 2 showed Officer McClinton surveillance footage from Business 1 which showed the suspects, later identified as Richard Lee Holston, Jr., (DOB: 10/20/1979) and Co-Defendant 1, break out the glass of the front door with a screwdriver. Co-Defendant 1 carries a crow bar with him into Business 1 while Holston has a screwdriver. Both Holston and Co-Defendant 1 were seen wearing gloves in the video. Holston and Co-Defendant 1 then go directly to where the cash register and other cash is located within Business 1. Holston and Co-Defendant 1 take the cash from the till. Holston and Co-Defendant 1 then go to the back where the safe is located and Co-Defendant 1 pushes the safe out towards the front door as Holston uses his cell phone for a light.

After viewing the surveillance footage, Officer McClinton spoke with Witness 2 who stated that Business 1 also does money transfers and payroll cashing, which is why they have large amounts of cash on hand and in the safe. Witness 2 described the safe as a 3' x 2' x 3' black safe. Witness 2 stated that there was \$30,000 in cash in the safe. Witness 2 stated that there was \$15,500 in cash in the till.

Officer McClinton viewed a local surveillance camera from Business 2 and was able to observe Holston and Co-Defendant 1 arrive in a 2014 Cadillac SRX SUV. Officer McClinton observed Holston and Co-Defendant 1 load the safe up in the rear hatchback of the vehicle before driving off. Officer Pike was later able to identify the license plate number attached to the vehicle utilized by Holston and Co-Defendant 1. A law enforcement alert was entered regarding the vehicle and license plate number.

On August 9, 2026, officers from the Dakota County Sheriff's Office and Hastings Police Department conducted a traffic stop on the vehicle. When they conducted the traffic stop Co-Defendant 1 was driving and Holston was the passenger. After placing Co-Defendant 1 and Holston under arrest law enforcement conducted a search of the vehicle pursuant to a signed search warrant.

During the search of the vehicle, Detective Sack of the Mankato Department of Public Safety located a pair of gloves and a red and black standard screwdriver in the vehicle. Detective Sack also found a wallet with credit cards belonging to Co-Defendant 1 in the center console of the vehicle, along with three cell phones. In the glove compartment Detective Sack located an iPhone and a wallet for the registered owner of the vehicle, Witness 3.

Pursuant to a search warrant, Detective Sack conducted a forensic extraction of Holston's cell phone. On Holston's cell phone Detective Sack observed regular phone calls and text messages between Holston and Co-Defendant 1 from August 1, 2026, through August 7, 2026. Detective Sack also observed a text message sent by Holston to Witness 4 that included a selfie picture of Holston inside the Cadillac SRX with the safe from Business 1 in the back of the vehicle. The picture was taken on the same day as the burglary at Business 1.

Officer McClinton also spoke with Witness 3 who confirmed that Holston and Co-Defendant 1 had

possession of his vehicle while Witness 3 is in the Polk County Jail in Iowa.

The estimate to replace the door/glass is more than \$501 but less than \$1000 in value. Witness 2 indicated that Holston and Co-Defendant 1 stole approximately \$45,500 in cash from Business 1 between the cash taken from the till and the cash inside the safe that was stolen. Holston and Co-Defendant 1 did not have permission to enter Business 1 and/or take the cash.

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

Matthew Huettl
Patrol Sergeant
710 S Front St
Mankato, MN 56001-3803
Badge: 3142

Electronically Signed:
09/17/2026 04:45 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:
09/17/2026 04:14 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: September 18, 2026.

Judicial Officer

Susan DeVos

Electronically Signed: 09/18/2026 09:48 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.

Richard Lee Holston Jr

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: