

State of Minnesota
County of Blue Earth

District Court
5th Judicial District

Prosecutor File No. 0070114082
Court File No. 07-CR-26-3571

State of Minnesota,

Plaintiff,

vs.

TODD RICHARD WYBERALA DOB: 02/18/1971

427 Whitfall St.
St. Paul, MN 55130

Defendant.

COMPLAINT

Order of Detention

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: Drugs - 3rd Degree - Poss. Sch 1 or 2 Narcotic, LSD, MDA, or MDMA in School/Park/Public Housing Zone

Minnesota Statute: 152.023.2(a)(4), with reference to: 152.023.3(a)

Maximum Sentence: 20 years or \$250,000, or both

Offense Level: Felony

Offense Date (on or about): 08/26/2026

Control #(ICR#): 26017943

Charge Description: On or about August 26, 2026, in the County of Blue Earth, Minnesota, Todd Richard Wyberala did on one or more occasions within a 90-day period the person unlawfully possesses any amount of a schedule I or II narcotic drug or five or more dosage units of lysergic acid diethylamide (LSD), 3,4-methylenedioxy amphetamine, or 3,4-methylenedioxymethamphetamine in a school zone, a park zone, a public housing zone, or a drug treatment facility.

COUNT II

Charge: Drugs - Store Meth Waste Products in the Presence of Child or Vulnerable Adult

Minnesota Statute: 152.137.2(a)(3), with reference to: 152.137.3

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

Offense Level: Felony

Offense Date (on or about): 08/26/2026

Control #(ICR#): 26017943

Charge Description: On or about August 26, 2026 in the County of Blue Earth, Minnesota, Todd Richard Wyberala, did, knowingly store any methamphetamine paraphernalia in the presence of a child or vulnerable adult; in the residence of a child or vulnerable adult; in a building, structure, conveyance or outdoor location where a child or vulnerable adult might reasonably be expected to be present; in a room

offered to the public for overnight accommodation; or in any multiple unit residential building.

COUNT III

Charge: Neglect or Endangerment of a Child/Neglect

Minnesota Statute: 609.378.1(a)

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

Offense Level: Gross Misdemeanor

Offense Date (on or about): 08/26/2026

Control #(ICR#): 26017943

Charge Description: On or about August 26, 2026, in the County of Blue Earth, Minnesota, Todd Richard Wyberala, did, as a parent, legal guardian, or caretaker, intentionally caused or permitted a child to be placed in a situation likely to substantially harm the child's physical, mental, or emotional health or cause the child's death.

STATEMENT OF PROBABLE CAUSE

Minnesota Bureau of Criminal Apprehension Special Agent Johnson was made aware by Homeland Security Investigations of a package that originated in mainland China bound for "Danny Boy, 125 North Agency St., Eagle Lake, MN" that contained an aluminum Glock conversion switch hidden within a keychain and necklace. A Glock conversion device is commonly referred to as a "switch" and is an illegal device that converts a semi-automatic Glock pistol to a full auto machine gun style weapon.

Agent Johnson learned that Daniel Russell Chevre (Dob 8/30/2007) listed 125 North Agency St. as his address on his driver's license. Agent Johnson also located a Facebook account associated with Chevre in which his vanity name was Danny Boy. Cassandra Lynn Letourneau (DOB 1/5/1989) also resides at 125 N. Agency St. Todd Richard Wyberala (DOB 2/18/1971) resides in the residence in a room, sharing a room with Letourneau. Agent Johnson also learned from St. Paul Police reports that Chevre previously utilized a Glock pistol in December 2024 during an incident in St. Paul in which a juvenile male was shot by Chevre in a drug related incident.

Based on this information, Agent Johnson obtained a Search Warrant for 125 N. Agency St. With the assistance of the Blue Earth County Sheriff's Office, Minnesota River Valley Drug Task Force, and Homeland Security Investigations.

The search warrant was executed at 12:15 PM on August 26, 2026, shortly after the package was delivered to the residence.

During the operation, Letourneau was stopped on a traffic stop after leaving the residence at 11:53 AM. Letourneau informed law enforcement that Chevre would not be cooperative and he would be in his bedroom in the house.

125 N. Agency St. is a public housing zone.

Chevre, Wyberala, Christina Joanne Pinc (DOB 2/7/1964), and four juveniles between the ages of 4 and 16, were located in the residence during the search warrant execution. Two of the children ages 4 and 7 are Wyberala and Letourneau's.

Chevre was located in his bedroom. Sitting in his lap was a loaded Glock .45. Installed in the Glock .45 was the machine gun conversion kit (the switch) that had just been delivered. The Glock .45 was confirmed to be stolen out of St. Paul. A second loaded Glock 27 40 S&W and drum style magazine (a drum style magazine is an extended capacity magazine) was located in Chevre's pocket.

During the subsequent search of Chevre's bedroom, law enforcement located the following pistols: a stolen Tactical assault rifled pistol confirmed to be stolen out of Dakota County, a loaded CZ 9mm handgun, a Glock 43X with a threaded barrel and drum magazine, a Beretta 9mm with magazine, a Glock 29 10mm, a Glock 22 40, a Glock 48 9mm, a Glock 30s .45, a Glock 27 40 with a machine gun conversion kit with a loaded magazine was on Chevre's bed. Two additional drum style high-capacity magazines, a magazine extender, a pistol carbine conversion kit (transforms a handgun to a shoulder-fired rifle), two 3D printed Glock style pistol frames and a 3D printer and filament, a box of 12 gauge shotgun slugs, multiple pistol parts including barrels and sights, 5.56 caliber magazines and ammunition, 10mm magazines and ammunition, 9mm magazines and ammunition, .40 caliber magazines and ammunition, and .45 caliber magazines and ammunition.

Law enforcement located 14 additional pieces of machine gun conversion devices in Chevre's bedroom. Agent Johnson noted these appeared to be components for four full switches with two additional parts of a

machine gun conversion kit.

Agent Johnson also located 6 empty bottles of promethazine, 33 suspected fentanyl pills – a Schedule II Controlled Substance – commonly referred to as M30s that field tested positive for fentanyl, and 97 suspected tramadol pills - a Schedule IV Controlled Substance, in Chevre's bedroom.

Law enforcement located methamphetamine pipes in various spots throughout the house.

During the execution of the search warrant, Chevre was in his bedroom. Officers noted Chevre began to stand up and that he was sitting on a pistol with a large magazine. Chevre was uncooperative and he initially began reaching into his groin area where the gun was located. He was actively resistant to law enforcement, thrashing around, and being verbally disruptive. While placing handcuffs on Chevre, law enforcement located another firearm in his right pant pocket. Chevre denied the switch on his gun was his and also stated "I just put this on the back of my gun". Chevre stated the first person he sees he is going to "bust on them" and that he hates the police. Another of the aforementioned pistols was located on the floor under the desk Chevre was sitting at.

Chevre was transported to the Blue Earth County Jail. Minnesota River Valley Drug Task Force (hereinafter "DTF") Agent Nelson and Homeland Security Investigations Special Agent Clifton conducted an interview of Chevre. Chevre was read his Miranda rights and agreed to speak. During the interview, Chevre admitted all of the guns and switches recovered belonged to him, and that he installed the switch delivered that day on the gun. He stated the gun he installed the switch on came from a guy "in the streets". He claimed the rest of the guns were legally purchased. Chevre stated he purchased all of the switches within the last year and he purchased them online from what he believed to be China. He admitted the 33 pills located belonged to him. Chevre stated the reason he did not shoot at law enforcement was because his mom and children were in the home, and had they not been there he would pulled the firearm in his lap on the officers (shot at them). Chevre made additional alarming comments that he would stab someone in the neck and watch that person die, and that doing so would not scare him as much as the time he is facing.

Wyberala was located in his bed in a bedroom watching pornography on his computer or television and the children were present while he was watching.

Located in Letourneau and Wyberala's bedroom law enforcement located a methamphetamine pipe containing a visible crystalline residue, multiple gem style baggies containing a crystalline residue that field tested positive for methamphetamine, and a 25mg fentanyl patch. Children's cups were located next to the gem baggies located in the room.

Wyberala spoke with Agent Nelson. Wyberala stated he stays at 125 North Agency more than his address in St. Paul. He stated he was aware Chevre had a firearm and does not let his children go in Chevre's room, and that he often hears Chevre yelling and/or threatening people online or on the phone. Wyberala also stated Chevre has threatened him with a firearm before and he believes Chevre gets his firearms through the mail. Wyberala admitted to using THC wax daily. His 4 year old and 7 year old children sleep in a makeshift bunkbed inside a closet in Wyberala and Letourneau's bedroom. He also stated he and Letourneau's drug of choice is methamphetamine and he estimated he had approximately 1 gram of methamphetamine in the residence and a fentanyl patch he got from someone who is deceased. He uses meth occasionally in the bathroom and the garage and picks up 1.75 grams at a time to use. Wyberala stated the children were sleeping while he was watching pornography "so it was alright". He also stated Pinc uses methamphetamine.

Letourneau spoke with Agents Date and Neudecker. She stated all of the guns in the residence were Chevre's. Letourneau stated Chevre smoked marijuana daily and denied knowledge of his use of other

narcotics. She stated her daughter and son sleep in the bedroom she has with Wyberala and had a bunk bed in the closet. She stated she smoked methamphetamine last week in the garage and refused to discuss Wyberala's drug use.

In a basement, which is occupied by Pinc, law enforcement located a methamphetamine pipe containing a visible crystalline residue and multiple gem style baggies containing crystalline residue that field tested positive for methamphetamine.

Pinc spoke to DTF Agent Fischbach. Pinc reported she has only lived at the residence for under 2 weeks.

The investigation is ongoing

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

Paul Barta
Captain
401 Carver Rd
Mankato, MN 56002-0228
Badge: 2721

Electronically Signed:
08/28/2026 07:56 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:
08/28/2026 07:33 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).

☐ 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 28, 2026.

Judicial Officer

Kristine Weeks
District Court Judge

Electronically Signed: 08/28/2026 08:25 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.

Todd Richard Wyberala

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: