

State of Minnesota  
County of Blue Earth

District Court  
5th Judicial District

Prosecutor File No. 0070108788  
Court File No. 07-CR-24-3803

---

**State of Minnesota,**

Plaintiff,

**COMPLAINT**

Summons

vs.

**RODNEY WAYNE LYON DOB: 01/01/1982**

340 Neubert Lane  
Mankato, MN 56001

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: Dangerous Weapons-Intentional Discharge of Firearm That Endangers Safety**

Minnesota Statute: 609.66.1a(a)(2), with reference to: 609.66.1a(b)(1)

Maximum Sentence: 2 years and/or \$5,000 fine

Offense Level: Felony

Offense Date (on or about): 03/30/2024

Control #(ICR#): 24005169

Charge Description: On or about March 30, 2024, in the County of Blue Earth, Minnesota, Rodney Wayne Lyon did intentionally discharge a firearm under circumstances that endanger the safety of another.

**COUNT II**

**Charge: Overwork/Mistreat Animals-Torture**

Minnesota Statute: 343.21.1, with reference to: 343.21.9(d)

Maximum Sentence: 2 yrs and/or \$5,000 fine

Offense Level: Felony

Offense Date (on or about): 03/30/2024

Control #(ICR#): 24005169

Charge Description: On or about March 30, 2024, in the County of Blue Earth, said Defendant, Rodney Wayne Lyon, did, overdrive, overload, torture, cruelly beat, neglect or unjustifiably injure, maim, mutilate, or kill any animal, or cruelly work any animal when it is unfit for labor, whether it belongs to that person or another person.

**COUNT III**

**Charge: Harassment - Reasonable fear of substantial bodily harm**

Minnesota Statute: 609.749.2(b)(1)

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

Offense Level: Gross Misdemeanor

Offense Date (on or about): 03/01/2024 to 03/14/2024

Control #(ICR#): 24005169

Charge Description: On or about between March 1, 2024, and March 14, 2024, in the County of Blue Earth, said Defendant, Rodney Wayne Lyon 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.

#### COUNT IV

**Charge: Harassment - Reasonable fear of substantial bodily harm**

Minnesota Statute: 609.749.2(b)(1)

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

Offense Level: Gross Misdemeanor

Offense Date (on or about): 03/01/2024 to 03/14/2024

Control #(ICR#): 24005169

Charge Description: On or about between March 1, 2024 and March 14, 2024, in the County of Blue Earth, said Defendant, Rodney Wayne Lyon 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.

#### COUNT V

**Charge: Harassment - Reasonable fear of substantial bodily harm**

Minnesota Statute: 609.749.2(b)(1)

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

Offense Level: Gross Misdemeanor

Offense Date (on or about): 06/08/2023

Control #(ICR#): 24005169

Charge Description: On or about June 28, 2023, in the County of Blue Earth, said Defendant, Rodney Wayne Lyon 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.

#### COUNT VI

**Charge: Harassment - Reasonable fear of substantial bodily harm**

Minnesota Statute: 609.749.2(b)(1)

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

Offense Level: Gross Misdemeanor

Offense Date (on or about): 01/01/2022 to 12/31/2023

Control #(ICR#): 24005169

Charge Description: On or about between January 1, 2022 and December 31, 2023, in the County of Blue Earth, said Defendant, Rodney Wayne Lyon 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.

## STATEMENT OF PROBABLE CAUSE

On March 30, 2024, at approximately 6:28 PM, Witness 1 called 911 and reported that someone had just shot their dog in rural Blue Earth County. Witness 1 reported that the dog was outside on the second level deck of their residence. Witness 1 reported that she lives at the residence with Witness 2 and Witness 2's two sons (13-year-old Witness 3 and 10-year-old Witness 4). It was reported that Witness 3 and Witness 4 were home at the time the dog was shot and that Witness 3 was near the deck when the dog was shot.

Witness 3 reported that the dog was out on the deck, which is attached to Witness 3's bedroom, and that he heard a bang or pop. The deck was separated from Witness 3's bedroom by only a glass door. Witness 3 observed the dog laying on the deck bleeding and began screaming.

A later examination of the dog's body by a forensic veterinarian showed that the dog died from a through-and-through gunshot wound.

Deputies from the Blue Earth County Sheriff's Office began an investigation into the death of the dog.

At approximately 6:35 PM on March 30, 2024, Witness 7 called 911 and reported hearing gunshots from the general area of the driveway of a nearby home. The nearby home belongs to, and is occupied by, Rodney Wayne Lyon. Witness 7, while speaking to law enforcement, pointed to the area from which she heard the gunshots. Witness 7 pointed almost directly at the residence of Lyon.

In speaking with Witness 2, the owner of the dog, law enforcement learned that Witness 2 had called 911 on March 14, 2024, and reported that he found a handwritten note on the ground under a small rock near his garage. Written on the note was the following: "If your dogs are out barking 1 more fucking time, they are DEAD! You disrespectful ignorant ASSHOLE!!!"

On that same date, March 14, 2024, Witness 5 and Witness 6, who live close to Witness 2 and Lyon, also located a handwritten note outside of their home. Written on the note was the following: "loose dogs/barking dogs are illegal. Shut the fuckers up + keep them in the house or move. Neighborhood is sick + fucking tired of it. If you don't listen they are DEAD!!! You ignorant disrespectful assholes!" Witness 5 and Witness 6 also reported that on March 16, 2024, one of their vehicles was keyed.

During the investigation law enforcement was made aware of two additional threatening notes.

On April 9, 2024, Detective Justin Lindmeyer spoke with Witness 8 and Witness 9. Witness 8 reported to law enforcement on June 30, 2023, that they received a note the day prior on the porch at their residence in the City of Mankato. The note stated: "If you stupid ignorant fuckheads put that God damn annoying fucking barking dog out unattended to bark again it will get a bullet in the head you dumb fucks!" Witness 8 told Detective Lindmeyer that the note really scared her and made her afraid that her dog would be killed. Law enforcement learned that Lyon lived near Witness 8 and Witness 9 in June of 2023.

On April 15, 2024, Detective Chris Welle spoke with Witness 10. Witness 10 stated that he had received a note at his residence in the City of Mankato a couple of years ago. Witness 10 stated that the note was placed under the windshield wiper of his vehicle. The note stated: "Keep your barking dogs in the house you disrespectful asshole! Or they are DEAD!" Witness 10 also stated that vehicles that were parked in his driveway at the time were keyed. Law enforcement learned that Lyon lived near Witness 10 at the time the note was discovered.

Law enforcement made contact with Lyon. Detective Steinbach spoke with Lyon. Lyon stated that he was at

home on the evening of March 30, 2024. Lyon stated that a person had come over to examine some motorcycle parts that Lyon was selling. Lyon stated that the person arrived at his residence at approximately 6:00 PM and left approximately 25 to 30 minutes later. The 911 call regarding the gunshots was received at 6:35 PM on March 30, 2024.

During the conversation with Detective Steinbach, Lyon admitted to writing the threatening notes to the owners of the dogs in rural Blue Earth County as well as a threatening note to another dog owner in Mankato in 2023. Lyon denied shooting Witness 1's dog.

Detective Lindmeyer drafted a search warrant for Lyon's residence. The search warrant was reviewed and signed by a judge of the Fifth Judicial District. During execution of the search warrant law enforcement collected numerous firearm related items including gun cases, instructional manuals for rifles and ammunition.

On April 25, 2024, Detective Lindmeyer spoke with a coworker (Witness 11) of Lyon's. Witness 11 stated that Lyon told him, approximately four months ago, that he wanted to shoot his neighbor's dogs because they were barking.

## 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:  
10/01/2024 01:07 PM  
Blue Earth County, MN

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

**Prosecuting Attorney**

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

Electronically Signed:  
10/01/2024 01:05 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 1, 2024.

**Judicial Officer**

Mark Betters  
District Court Judge

Electronically Signed: 10/01/2024 01:33 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.

**Rodney Wayne Lyon**

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: