

State of Minnesota  
County of Blue Earth

District Court  
5th Judicial District

Prosecutor File No. 0070113115  
Court File No. 07-CR-26-1186

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**State of Minnesota,**

Plaintiff,

vs.

**JACKDAK JOHN KULANG DOB: 02/19/2008**

700 Elwood Court  
Nicollet, MN 56074-2093

Defendant.

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**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: Aid and Abet Assault-2nd Degree-Dangerous Weapon**

Minnesota Statute: 609.222.1, with reference to: 609.05.1, 609.11.5(a)

Maximum Sentence: Not less than 36 months nor more than 7 years or \$14,000 fine or both.

Offense Level: Felony

Offense Date (on or about): 02/20/2026

Control #(ICR#): 26005300

Charge Description: On or about February 20, 2026, in the County of Blue Earth, Minnesota, Jackdak John Kulang, did intentionally aid, advise, hire, counsel, or conspire with, or otherwise procure another to commit the crime, and/or did personally commit said crime; to wit: assault another with a firearm.

**COUNT II**

**Charge: Carry/Possess Pistol w/out Permit - Public Place - Gross Misdemeanor; Second or Subsequent - Felony-G**

Minnesota Statute: 624.714.1a

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

Offense Level: Gross Misdemeanor

Offense Date (on or about): 02/20/2026

Control #(ICR#): 26005300

Charge Description: On or about February 20, 2026, in the County of Blue Earth, Minnesota, Jackdak John Kulang did, did carry, hold or possess a pistol in a motor vehicle, snowmobile, or boat or on or about the person's clothes or the person or was otherwise in possession or control in a public place, as defined in section 624.7181, subdivision 1, paragraph (c), without first having obtained a permit to carry the pistol.

**COUNT III**

**Charge: Carry/Possess Pistol w/out Permit - Public Place - Gross Misdemeanor; Second or Subsequent - Felony-G**

Minnesota Statute: 624.714.1a

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

Offense Level: Gross Misdemeanor

Offense Date (on or about): 02/03/2026 to 03/04/2026

Control #(ICR#): 26005300

Charge Description: On or between February 3, 2026 and March 4, 2026, in the County of Blue Earth, Minnesota, Jackdak John Kulang did, did carry, hold or possess a pistol in a motor vehicle, snowmobile, or boat or on or about the person's clothes or the person or was otherwise in possession or control in a public place, as defined in section 624.7181, subdivision 1, paragraph (c), without first having obtained a permit to carry the pistol.

## STATEMENT OF PROBABLE CAUSE

On February 20, 2026, at 9:06 PM, officers of the Mankato Department of Public Safety were dispatched to a weapons complaint at a location in the City of Mankato. Victim reported to dispatch two males pointed a gun at him, and the two males exited the vehicle and began to run. Victim provided a description of the two males, two black males and a description of the clothing he observed them wearing. In addition, Victim provided a description of the vehicle and its license plate number. Officers contacted the registered owner of the vehicle, Witness 2, who was surprised Jackdak John Kulang (DOB 02/19/2008) was not home and told officers Kulang must have taken the vehicle without her permission.

Officers arrived on scene, spoke to Victim, and canvassed the area. Victim reported he works for a food delivery service and did a delivery at the apartment complex where the incident occurred. After delivering the food and returning to his vehicle, Victim noticed the vehicle parked in the lot. The vehicle then pulled up next to his and the passenger extended his body out of the window and pointed a handgun at his head. Victim described the handgun as silver. The vehicle then left the parking lot and Victim followed to get a license plate number. Victim indicated the vehicle then returned the apartment complex and the two males exited and fled towards one of the apartment buildings. Witness 1, who was in Victim's vehicle, indicated she did not see the gun, but saw Victim duck his head and Victim told her that someone pointed a gun at him.

Officers located a phone in the suspect's vehicle and the number associated with the phone is listed as Kulang's. Also located in the vehicle was a paystub listed to Kulang. Officers located a 9mm Blazer brand unspent bullet on the passenger side floor board. Officers collected DNA samples from the vehicle.

Kulang and the other male were not located at the scene. Surveillance camera footage from the apartment complex the incident occurred was located and reviewed by officers. The video shows Kulang's vehicle arrive at 8:30 PM and park in the parking lot. The front right passenger is seen exiting and running towards one of the apartments, then returning and getting back in the vehicle. Victim's vehicle then arrives and parks. Kulang's vehicle then circles the parking lot three times. At 9:01 PM, as Kulang's vehicle passes by Victim, the passenger aims both arms out of the window and appears to point something at Victim. Both vehicles then leave the parking lot. Approximately 6 minutes later Kulang's vehicle arrives back in the parking lot and the driver and passenger exit the vehicle and run towards one of the apartment buildings at the complex.

Officers spoke to Witness 2 and Witness 3. They indicated Kulang had returned home. Witness 2 told officers Kulang indicated he had went to hang out with "Nyal", who lives at the apartment complex, because Nyal owed him money. Kulang told Witness 2 he was the one driving the vehicle. Witness 2 asked Kulang how he was able to call his friend and Kulang stated Nyal called a friend. Kulang declined to speak with officers and refused a request for consent to provide a DNA sample.

Witness 4, the property manager for the apartment complex, advised officers he was almost certain the two males entered an apartment in which Nhial Kier Deng (DOB 12/09/2007) resides. Witness 4 also told law enforcement a maintenance worker observed 4 9mm Blazer brand bullets (the same brand that was located in the bullet in Kulang's vehicle) located next to a dumpster by the garages near Deng's apartment building. Witness 4 collected those bullets and provided them to law enforcement.

Detective Hulloper conducted a manual review and forensic extraction of Kulang's phone. Videos recovered from the phone show a male in the driver's seat of Kulang's vehicle holding a P80 handgun (ghost gun) that had a weapon light or laser affixed to it. The male passenger in the vehicle observed on the video was Deng. Deng is captured in the video holding a semi-automatic handgun with an extended

magazine, the slide of which appeared to be tan or silver. The male driver was wearing a sweatshirt that matched the sweatshirt Kulang was wearing when he spoke with Detective Hullopeter on February 24, 2026. A second video showed the driver standing on a roadway firing a handgun several times and Kulang's vehicle license plates are visible in the video. The person taking the video could be heard, and Detective Hullopeter noted the voice sounded like Deng's. The video captured the person taking the video holding the same gun Deng possessed in the first video.

The metadata attached to the video identified the times the videos were taken as 7:46 PM on February 20, 2026, and the location it was taken as on Pohl Rd.

A third video was located that was time stamped 8:14 PM on February 20, 2026. The video showed a male dressed in clothes identical to the clothing Deng had on in the first video firing a handgun several times.

Detectives searched the area the video was taken and located 2 spent 9mm Blazer brand shell casings.

A fourth video was located on the phone time stamped February 10, 2026 at 9:15 PM. The video showed a male standing on a road firing a handgun several times in the dark. Numerous photographs dated February 10, 2026 were also located showing Deng holding two handguns consistent with the two guns observed in the videos.

Additional videos and photos were located and time stamped February 3 and 4, 2026 capturing additional incidents in which a male is seen firing a handgun in the air near Pohl Rd and showing Deng in the vehicle holding a handgun with an extended magazine, flashing hand signals at a panhandler, and showing a gun to the panhandler. Kulang is also observed holding a handgun with a silver barrel while in his vehicle.

On March 24, 2026, officers executed a search warrant at Deng's residence. Deng was taken into custody. Detective Knutson located in Deng's bedroom, under a mattress, a Ziploc bag contained 40-100 rounds of 9mm Blazer ammunition.

Neither Kulang nor Deng have valid permits to carry a handgun.

## 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**

Jeff Knutson  
Sergeant  
710 S Front St  
Mankato, MN 56001-3803  
Badge: 3148

Electronically Signed:  
03/25/2026 01:48 PM  
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:  
03/25/2026 01:33 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: March 25, 2026.

**Judicial Officer**

Bradley C Walker  
District Court Judge

Electronically Signed: 03/25/2026 02:12 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.

**Jackdak John Kulang**

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: