

State of Minnesota
County of Carver

COPY

District Court
1st Judicial District

Prosecutor File No.
Court File No.

0100105525

State of Minnesota,

Plaintiff,

vs.

PATRICK DARRYL WILL DOB: 08/24/1968

14975 142nd St
Norwood Young America, MN 55368

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: Overwork/Mistreat Animals-Torture

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

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

Offense Level: Felony

Offense Date (on or about): 06/15/2024

Control #(ICR#): 24016218

Charge Description: On or about June 15, 2024, in the County of Carver, Minnesota, defendant overdrove, overloaded, tortured, cruelly beat, neglected, or unjustifiably injured, maimed, mutilated, or killed any animal, or cruelly worked any animal when it was unfit for labor, whether it belonged to that person or to another person and it resulted in death or great bodily harm to the pet or companion animal.

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

On June 15, 2024, Deputy Hendricks of the Carver County Sheriff's Office received a report from A.B. indicating that her dog, Gus, had been shot somewhere near her residence in Young America Township, Carver County. A.B. had taken Gus to the Blue Pearl Pet Hospital in Golden Valley, where the veterinarian recovered a gold colored .22 caliber bullet and noted at least one other gunshot wound. Gus was euthanized due to the extent of its injuries.

Detective Cepuran later reviewed Ring footage from A.B.'s residence and confirmed that Gus had walked down the driveway with A.B.'s son at 11:48 AM and returned bleeding at 12:08 PM. A.B. indicated Gus is a certified therapy dog for her sons.

Detective Cepuran spoke with neighbors, one of which was Patrick Darryl Will (DOB 08/24/1968), hereinafter Defendant. During their first conversation Defendant avoided eye contact and claimed he had been away from the residence around noon on June 15.

On June 20, Detective Cepuran spoke with Defendant's mother, L.F. who indicated she had seen what she believed was Gus on her property multiple times. L.F. stated she had told Defendant "if something happens or a dog comes out here then get rid of it." L.F. stated Defendant had not discussed with her if he had done anything to Gus, but she had believed that Gus was a stray.

Later that day Detective Cepuran spoke with Defendant at Defendant's workplace. Prior to asking any questions Defendant stated "I did it... it was on my yard. I shot the damn thing." Defendant then stated "I've had so many dogs that been running out there everybody drops (inaudible) off in town, that dogs been on the yard ten, twelve times, and I think my mother had made an attempt to go up there and tell them people nobody ever comes to the door."

Defendant later stated he had originally thought Gus was a coyote and went to retrieve his rifle. After obtaining the rifle, Defendant realized the animal was a dog that he believed he had seen on the property previously. Defendant indicated he shot at Gus, attempting to aim above its head. Gus then ran into some brush and Defendant shot into the area.

PLEASE TAKE NOTICE: Pursuant to Minn. Stat. 609.49., intentional failure to appear for duly scheduled court appearances may result in additional criminal charges, and in addition to any arrest warrant that may otherwise be issued by the Court.

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

Logan Wehner
Deputy Sheriff
606 E 4th Street
Chaska, MN 55318
Badge: 848

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

Prosecuting Attorney

Kevin A Hill
Assistant County Attorney
604 E 4th Street
Chaska, MN 55318-2102
(952) 361-1400

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: _____, _____.

Judicial Officer <judge name>

Sworn testimony has been given before the Judicial Officer by the following witnesses:

COUNTY OF CARVER
STATE OF MINNESOTA

State of Minnesota

Plaintiff

vs.

Patrick Darryl Will

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: