

**State of Minnesota
County of Hennepin**

**District Court
Fourth Judicial District**

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|----------|------------------------------------|--------------|----------|---------------------------------|--|-------------------------------------|
| CCT 1 | LIST CHARGE STATUTE ONLY 609.53 | MOC Q114C | GOC X | CTY ATTY FILE NO. 13-2708 | CONTROLLING AGENCY MN0270000, MN0273400 | CONTROL NO 13026826, 13008758 |
|----------|------------------------------------|--------------|----------|---------------------------------|--|-------------------------------------|

COURT CASE NO. DATE FILED

✓if more than 6 counts (see attached) ✓if Domestic Assault as defined by MS 518B01, sub2a,b

Amended Tab Charge Previously Filed

State of Minnesota,

PLAINTIFF,

VS.

| | |
|--|---|
| <input type="checkbox"/> SERIOUS FELONY | <input checked="" type="checkbox"/> SUMMONS |
| <input checked="" type="checkbox"/> FELONY | <input type="checkbox"/> WARRANT |
| <input type="checkbox"/> GROSS MISDM DWI | <input type="checkbox"/> ORDER OF DETENTION |
| <input type="checkbox"/> GROSS MISDM | <input type="checkbox"/> EXTRADITION |

NAME: first, middle, last
CHAD STEVEN HOVDE

DEFENDANT,

| | | |
|----------------|------------------|---------------|
| Date of Birth | MNCIS #: | 27-CR- |
| 6/20/76 | LE#: | 13-24462 |
| | SILS ID: | 365068 |
| | TRACK ID: | 2684575 |

3139 23RD AVE S
MINNEAPOLIS, MN 55407

COMPLAINT

The Complainant, being duly sworn, makes complaint to the above-named Court and states that there is probable cause to believe that the Defendant committed the following offense(s). The complainant states that the following facts establish PROBABLE CAUSE:

Your Complainant, Detective Ramone Walton, is an Investigator with the Hennepin County Sheriff's Office. In that capacity he has reviewed the facts and circumstances of this matter and believes the following establishes probable cause:

On or about August 15, 2013, Rogers Police Officers were dispatched to a business called Enviro-Chem located at 11915 Brockton Lane, within the City of Rogers, Hennepin County, regarding a reported theft. Enviro-Chem Manager, C.S., reported that a male he identified as prior customer **BRADLEY SANFORD ODELL II**, defendant Odell herein, brought in a huge amount of copper weighing approximately 4,000 pounds for recycling. The copper was magnetic copper wiring on spools that is generally used for transformers. C.S. stated that the copper was accepted by another employee, N.A.W., for which defendant Odell was paid with two checks – one for \$5,250.24 and another for \$6,266.88 representing the scrap value of the copper wire. Defendant Odell used false names on two different forms when he was getting the checks. When C.S. went outside and saw the spools of copper wire in brand new condition stacked on pallets, he became suspicious that it had been stolen. C.S. immediately called the bank and stopped payment on the two checks and reported the incident to police. Surveillance video of the transaction at Enviro-Chem shows defendant Odell riding up on a motorcycle at the same time as another male, subsequently identified as **CHAD STEVEN HOVDE**, defendant Hovde herein, who was transporting the copper spools and pallets in a white pickup truck. In addition, surveillance photographs of defendant Odell and defendant Hovde, as well as a copy of defendant Odell's driver's license and additional personal information provided by Odell, were obtained from Highland Bank in Maple Grove, Hennepin County, where they attempted to cash the two

Enviro-Chem checks. A bank employee, J.A.P., noted that defendant Odell and defendant Hovde had arrived in a white Chevrolet pickup truck bearing license plate no. 500GHA.

When Rogers Police Officers observed the magnetic copper wire on the spools, they noted that the shipping labels were partially destroyed so that they were unable to identify the business to which the copper spools were delivered. A Tri-County alert was issued regarding the copper salvaging transaction in an attempt to locate defendant Odell and the driver of the white Chevrolet pick-up, who remained unidentified at that time. A Brooklyn Center detective recognized the white Chevrolet pickup truck and license plate, and identified the male driver as defendant Hovde, who was known from prior contact. Subsequently a state-wide alert was issued through the Minnesota Crime Alert Network seeking additional information as to how defendant Odell and defendant Hovde came into possession of the spools of copper wire. Officers obtained information that a company, Jordan Transformer, located within the City of Jordan, Scott County, Minnesota, was a business that used the type of magnetic copper wiring brought for salvage to Enviro-Chem. When contacted, the owner of the Jordan Transformer, M.S.K., told Officers that he would be surprised if any copper wiring was missing since their inventory was locked in protective storage containers. However, when checking the inventory, Jordan Transformer personnel found that one of their van trailers had been entered and all of the spools of copper wire and pallets from that container had been removed. The padlocks that had been on the storage container were cut and left on the ground along with crowbars. Surveillance video showed two individuals breaking into the storage container on August 11, 2013. A police report was filed with the Jordan Police Department regarding the theft of the magnetic copper wire spools. The copper wire spools that defendant Odell and defendant Hovde attempted to salvage at Enviro-Chem matched the copper wire spools missing from Jordan Transformer's inventory. Jordan Transformer did not give anyone permission to take any of the magnetic copper wire spools from their inventory.

In a post-*Miranda* statement, defendant Odell stated that he agreed to help out defendant Hovde scrap the copper spools since defendant Hovde did not have any identification. Defendant Odell said he agreed to do so because he had two vehicles in impound that was going to cost him \$1,500.00 to retrieve. Defendant Odell admitted that he should have known that the copper spools were stolen, but he agreed to help defendant Hovde scrap the copper in exchange for defendant Hovde getting his vehicles out of impound. Defendant Odell further admitted that he went with defendant Hovde to Enviro-Chem in Rogers and signed the invoices in the names of "Rick James" and "Big Dick Bill", and later attempted to cash the two checks he was given for the copper at Highland Bank.

The scrap value of the copper wiring is approximately \$4.00 per pound; however the magnetic copper wiring retails for approximately \$6.00 to \$8.00 per pound.

Defendant Odell is not in custody.

Defendant Hovde is not in custody.

COMPLAINT SUPPLEMENT

| CCT | SECTION/Subdivision | M.O.C. | GOC |
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OFFENSE

COUNT 1: RECEIVING STOLEN PROPERTY (FELONY)
MINN. STAT. § 609.53, SUBD. 1; § 609.52, SUBD. 3(2); § 609.05
PENALTY: 0-10 YEARS AND/OR \$20,000

That on or about August 15, 2013, at 11915 Brockton Lane, within the City of Rogers, in Hennepin County, Minnesota, **CHAD STEVEN HOVDE**, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with **BRADLEY SANFORD ODELL II**, received, possessed, transferred, bought or concealed stolen property or property obtained by robbery that had a value in excess of Five Thousand Dollars (\$5,000.00), and they knew or had reason to know the property was stolen or obtained by robbery.

NOTICE: You must appear for every court hearing on this charge. A failure to appear for court on this charge is a criminal offense and may be punished as provided in Minn. Stat. § 609.49.

| | |
|--|---|
| <i>THEFORE, Complainant requests that said Defendant, subject to bail or conditions of release be:</i> | |
| 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; | |
| <i>and that said Defendant otherwise be dealt with according to law.</i> | |
| COMPLAINANT'S NAME: Ramone Walton | COMPLAINANT'S SIGNATURE: |
| <i>Being duly authorized to prosecute the offense(s) charged, I hereby approve this Complaint.</i> | |
| DATE: rew | PROSECUTING ATTORNEY'S SIGNATURE: |
| <i>PROSECUTING ATTORNEY:</i> | |
| NAME/TITLE: LEA M DE SOUZA (163958) Assistant County Attorney | ADDRESS/TELEPHONE: C2100 Government Center, Minneapolis, MN 55487 Telephone: 612-596-0952 |

Court Case # _____

This COMPLAINT was subscribed and sworn to before the undersigned this ____ day of _____, 20____.

NAME:

SIGNATURE:

TITLE:

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 his detention, if already in custody, pending further proceedings. The Defendant(s) is/are thereof charged with the above-stated offense.

SUMMONS

THEREFORE YOU, THE ABOVE-NAMED DEFENDANT(S), ARE HEREBY SUMMONED to appear on the _____ day of _____, 20____ at _____ AM/PM before the above-named court at _____ to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

WARRANT

EXECUTE IN MINNESOTA ONLY

To the sheriff of the above-named county; or other person authorized to execute this WARRANT; I hereby order, in the name of the State of Minnesota, that the above-named Defendant(s) be apprehended and arrested without delay and brought promptly before the above-named 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 thereafter as such Judge or Judicial Officer is available) to be dealt with according to law.

ORDER OF DETENTION

Since the above-named Defendant(s) is already in custody; I hereby order, subject to bail or conditions of release, that the above-named Defendant(s) continue to be detained pending further proceedings.

Bail: NBR (\$ 10,000.00 if Defendant fails to appear on Summons)

Conditions of Release: No contact with victims, Enviro-Chem, Rogers, MN and Jordan Transformer, Jordan, MN, **No contact with victim(s); No contact with witness(es); No contact with address of the offense or home/work of victim(s) and witness(es)**

This COMPLAINT- **SUMMONS** duly subscribed and sworn to, is issued by the undersigned Judicial Officer this ____ day of _____, 20____.

NAME:

SIGNATURE

TITLE: **JUDGE OF DISTRICT COURT**

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

STATE OF MINNESOTA

COUNTY OF HENNEPIN

Clerk's Signature or File Stamp:

STATE OF MINNESOTA

Plaintiff

vs.

CHAD STEVEN HOVDE

Defendant(s).

RETURN OF SERVICE

I hereby Certify and Return that I have served a copy of this COMPLAINT – SUMMONS, WARRANT, ORDER OF DETENTION upon Defendant(s) herein-named.

Signature of Authorized Service Agent: