

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

State of Minnesota,

Plaintiff,

**REQUEST TO RETURN BAIL TO A  
THIRD PARTY**

vs.

Richard Raynell Kelley  
Defendant.

Court File: 27-CR- 20-12167

I, Richard Raynell Kelley, am the defendant in this case.

I understand bail money may be posted on my behalf in this case.

I understand that any bail money posted belongs to me according to Minn. Stat. § 629.53.

I understand the Court must return any refunded bail to me, unless I make a written request for the bail money to be returned to someone else.

I am asking the Court to return any refunded bail in this case to:

Name: Minnesota Freedom Fund  
Address: Minnesota Freedom Fund  
PO Box 6398  
Minneapolis, MN, 55406-0398

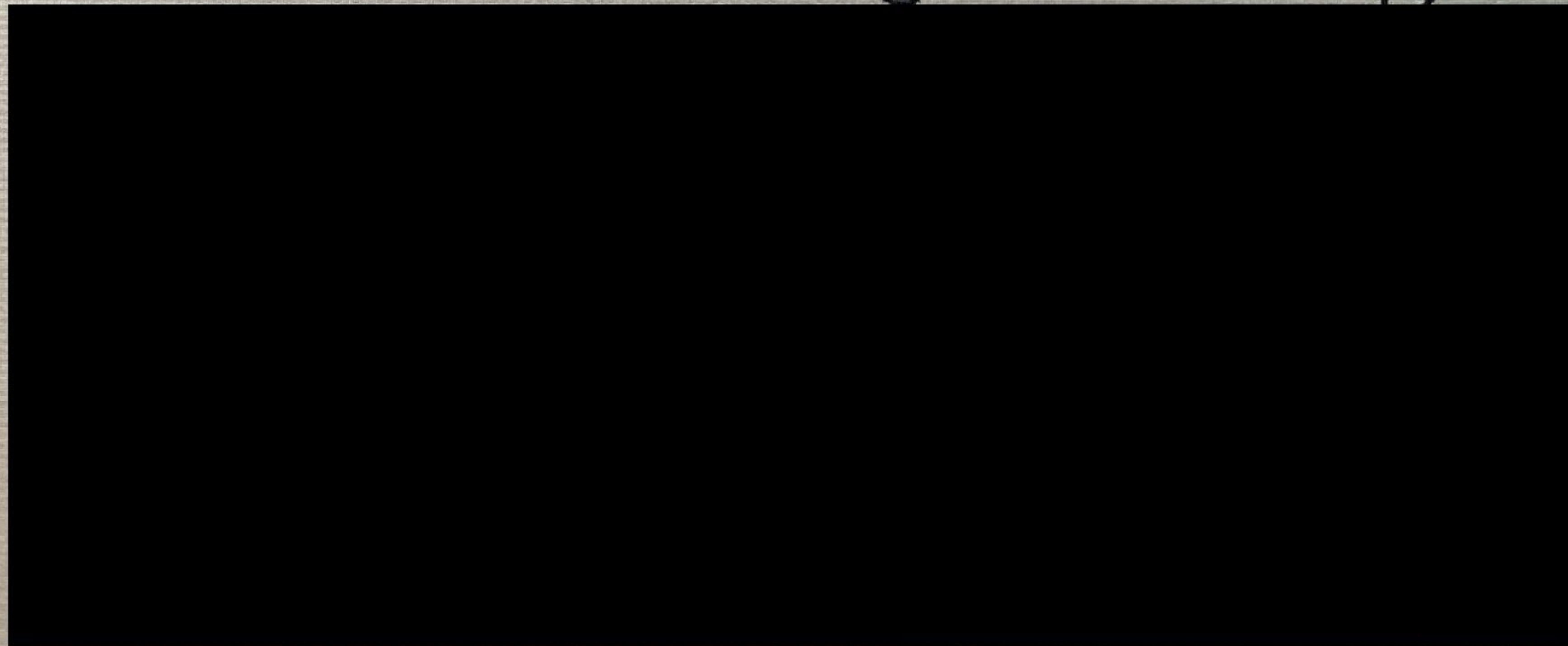
I declare under penalty of perjury that everything I have stated in this document is true and correct. Minn. Stat. § 358.116.

Dated: 8/10/2020

[Handwritten Signature]  
Signature

Hennepin County, Minnesota  
County and State where signed

Name: Richard Raynell Kelley







State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 20A05375  
Court File No. 27-CR-20-12167

State of Minnesota,  
Plaintiff,

**COMPLAINT**  
Warrant

vs.

**RICHARD RAYNELL KELLEY** DOB: 09/15/1967



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: Burglary-1st Deg-Assault Person In Build/On Property**

Minnesota Statute: 609.582.1(c), with reference to: 609.582.1

Maximum Sentence: 20 YEARS AND/OR \$35,000

Offense Level: Felony

Offense Date (on or about): 04/17/2020

Control #(ICR#): 20103067

Charge Description: That on or about 4/17/2020, in Minneapolis, Hennepin County, Minnesota, RICHARD RAYNELL KELLEY, either directly or as an accomplice, entered a dwelling, without consent and with intent to commit a crime or committed a crime, while in the dwelling and assaulted Victim, a person within the dwelling.

Minimum Sentence: SIX MONTHS

**COUNT II**

**Charge: Domestic Abuse - Violate Order for Protection**

Minnesota Statute: 518B.01.14(a), with reference to: 518B.01.14(b)

Maximum Sentence: 90 DAYS AND/OR \$1,000

Offense Level: Misdemeanor

Offense Date (on or about): 04/17/2020

Control #(ICR#): 20103067

Charge Description: That on or about 4/17/2020, in Minneapolis, Hennepin County, Minnesota, RICHARD RAYNELL KELLEY violated a protective order pursuant to Minn. Stat. 518B.01.



STATEMENT OF PROBABLE CAUSE

Complainant has investigated the facts and circumstances of this offense and believes the following establishes probable cause:

On April 20, 2020, Officers responded to a domestic abuse call at a home on [REDACTED] in Minneapolis, Minnesota, in Hennepin County. On arrival, Officers encountered a 71-year-old female who will be referred to hereafter as Victim. Victim had apparent injuries, including a swollen eye that was completely red/bloodshot, and bruises on her chest, shoulders, back, and legs. Officers observed a pool of blood at the bottom of the staircase. Victim was transported by ambulance to obtain medical care.

Victim told Officers that she has an active order for protection against her son, identified as Richard Raynell Kelley, DOB 9/15/1967 ("Defendant"). Despite the OFP, Victim reported that Defendant continues to break into her home. Victim told Officers that on or about Friday, April 17, 2020, Defendant came to her home. Victim confronted him about why he was there. As she tried to walk away from him up the stairs, Defendant grabbed Victim by her shoulders from behind, and pulled Victim down the stairs. Defendant then began hitting and beating Victim, punching and kicking her in the ribs, back, and right eye.

Defendant then taped Victim's ankles and wrists together. He left Victim duct taped, laying on the floor at the foot of the stairs, in the area where Officers later found a pool of blood. Defendant proceeded to run up and down the stairs multiple times, stepping on Victim each time he passed her. Defendant then told Victim he was going to kill her and went outside. Apparently frustrated in this plan, Defendant then returned to the house, made food, and sat on a couch near the front door where he could keep an eye on Victim, who was still laying, duct taped, at the bottom of the stairs. Defendant fell asleep. After a period of time, he got up, made food, and fell asleep again on the couch.

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After Defendant fell asleep a second time, Victim slid her way up the wall and was able to get into the kitchen, grabbed a blade from a blender, and returned to the foot of the staircase. Using the blender blade, Victim began trying to cut the duct tape from her wrists and ended up cutting her hands. Defendant woke up and pushed her to the side, asking her what she was doing. He then released Victim and left the house.

Victim explained that she did not seek medical attention or report the assault immediately because she feared leaving the house due to the coronavirus outbreak. However, she ultimately reported when she became afraid that Defendant would return to the house. Victim told officers that she lost consciousness at times during the assault. She preserved the duct tape that was used to tie her up and provided it to Officers.

Victim has an active order for protection against Defendant, which was served on April 15, 2014, and is valid until 2051. (27-FA-14-1760.) This OFP admonishes Defendant to stay away from Victim and stay at least two blocks away from Victim's address. In bold, all-caps language, the order states that Defendant shall not enter or stay at Victim's home, even if invited.

Defendant is not in custody and the State has concerns about public safety due to the seriousness offense. In addition, conditions of release will be needed to protect the public and the victim in this case, particularly given Defendant's history of failing to follow the conditions of the order for protection. Therefore, a warrant complaint is requested.



STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

State of Minnesota, Plaintiff.

**ORDER REVOKING CONDITIONAL  
RELEASE AND APPEARANCE**

vs.

Richard Raynell Kelley, Defendant.  
Dist Ct File 27-CR-20-12167

On August 17, 2020, the Department of Community Corrections and Rehabilitation filed a Conditional Release Violation Report, alleging under penalty of perjury that Defendant violated the following interim conditions in this case:

**1. Remain on Electronic Home Monitoring (EHM) and follow EHM rules**

The court finds that there is probable cause to believe Defendant has violated the interim conditions, so the Conditional Release is hereby set aside and vacated. Defendant is ordered to appear before a Judicial Officer of the District Court so that a final determination may be made as to whether Defendant has violated the interim conditions.

**SUMMONS**

I order court administration to summons the defendant to appear before a Judicial Officer.

**WARRANT**

It is further ordered that a bench warrant shall be issued for the defendant's apprehension.

Bail: \$100,000.00 (Note: Hold without bail cannot be ordered unless a guilty plea/finding has been entered and the defendant is awaiting sentencing.)

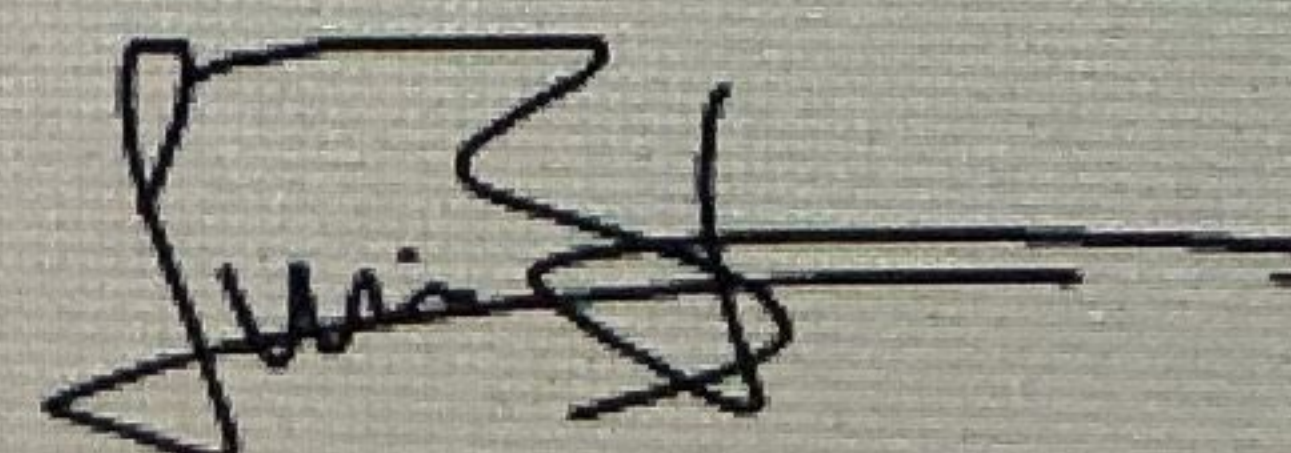
**ORDER OF DETENTION**

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: \_\_\_\_\_ (Note: Hold without bail cannot be ordered unless a guilty plea/finding has been entered and the defendant is awaiting sentencing.)

Aug 18, 2020

BY THE COURT:



Bartolomei, Luis

2020.08.18

15:05:13 -05'00'

Judge of District Court

