

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 20A03730
Court File No. 27-CR-20-7229

State of Minnesota,
Plaintiff,

COMPLAINT
Order of Detention

vs.

JASON RANDOLPH RYNDERS DOB: 08/05/1986

10560 97th Ave N
Maple Grove, MN 55369

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: Criminal Vehicular Homicide - Driver Who Causes Collision Leaves Scene

Minnesota Statute: 609.2112.1(a)(7), with reference to: 609.2112.1(a)

Maximum Sentence: 10 YEARS AND/OR \$20,000

Offense Level: Felony

Offense Date (on or about): 03/16/2020

Control #(ICR#): 20012230

Charge Description: That on or about 3/16/2020, in Hennepin County, Minnesota, JASON RANDOLPH RYNDERS did, by operating a motor vehicle, cause a collision that caused the death of D.L.D., and JASON RANDOLPH RYNDERS left the scene of that collision.

STATEMENT OF PROBABLE CAUSE

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

On March 16, 2020 at approximately 6:50 a.m., officers with the Brooklyn Park Police Department responded to the area of Humboldt Avenue North and Meadowwood Drive, Brooklyn Park, Hennepin County on a report of an unconscious person lying in the road and a school bus leaving the area.

Upon their arrival, officers spoke with K.B.L, who had called 911. K.B.L. was visibly upset. He stated that he was driving to work, traveling approximately 30 m.p.h. on Humboldt Avenue. He then saw a school bus stopped on the right side of the road. K.B.L. then felt his car hit something in the road. He got out and saw that he had hit a person. K.B.L. said the driver of the bus was standing outside for about five seconds. K.B.L. told the bus driver to call 911. Instead, the bus driver got back into the school bus and left the area. K.B.L. had to call 911.

The person struck was pronounced dead at the scene and was identified as D.L.D., an adult female. The medical examiner processed the scene as well as accident reconstruction experts. These reports are pending completion. However, preliminary analysis indicates that D.L.D. was hit by the front of the school bus and then again by the front axle, the rear tires, or possibly both.

Officers canvassed the neighborhood. Many homeowners did not witness the crash. However, one homeowner had a video surveillance system that captured part of the collision and aftermath. The video shows a bus turning westbound on Meadowwood Drive to Humboldt Avenue North. The collision and the sound of a voice is heard. The bus is then seen stopped. A male driver gets out of the bus and runs back toward the direction of the collision. A person, believed to be K.B.L., is heard yelling to call 911 repeatedly. This driver of the bus is then seen running back to the bus and leaving the area. The bus appears to be occupied by children.

After extensive investigation, officers identified the bus driver as JASON RANDOLPH RYNDERS (DOB: 08/05/1986; hereinafter "Defendant"). Defendant is a driver and trainer for NorthStar Bus Company. Investigators spoke with Defendant, who admitted to hearing a noise and exiting his bus but said he did not think he hit anyone.

The bus SD card was retrieved, retained, and reviewed. There are three camera angles covering the bus. Camera 1 covers the front of the bus and driver looking back. Camera 2 shows the rear of the bus looking forward, and Camera 3 shows the back of the bus looking down. Four to five children are shown on the bus at the time of the collision. At 6:41:21 a.m., the bus appears to shudder or hit something. Defendant pulls over and gets out of the bus. He comes running back at 6:42:22 a.m. At about 7:25 a.m., Defendant drops the children off at school. After all the children are off his bus, Defendant gets out and looks under the driver's side of the bus and then continues to walk around the bus.

Defendant is in-custody.

NOTE: THE STATE WILL SEEK AN AGGRAVATED SENTENCE FOR, INTER ALIA, THE PRESENCE OF CHILDREN.

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

Scott Parsons
Detective
5400 85th Ave N
Brooklyn Park, MN 55443
Badge: 102

Electronically Signed:
03/18/2020 11:29 AM
Hennepin County, Minnesota

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

Prosecuting Attorney

Leah Erickson
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
03/18/2020 11:22 AM

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 on _____, _____ at _____ AM/PM before the above-named court at the address listed on the attached court summons 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: \$150,000.00

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 18, 2020.

Judicial Officer

Tamara Garcia
District Court Judge

Electronically Signed: 03/18/2020 11:33 AM

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

**COUNTY OF HENNEPIN
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

JASON RANDOLPH RYNDERS

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:

DEFENDANT FACT SHEET

Name: JASON RANDOLPH RYNDERS
DOB: 08/05/1986
Address: 10560 97th Ave N
Maple Grove, MN 55369

Alias Names/DOB:

SID: MN20CC0647

Height:

Weight:

Eye Color:

Hair Color:

Gender: MALE

Race: White

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: Yes

Driver's License #:

SILS Person ID #: 878089

SILS Tracking No. 3164627

Alcohol Concentration:

STATUTE AND OFFENSE GRID

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	3/16/2020	609.2112.1(a)(7) Criminal Vehicular Homicide - Driver Who Causes Collision Leaves Scene	Felony	J1317		MN0270300	20012230
	Penalty	3/16/2020	609.2112.1(a) Criminal Vehicular Homicide - Penalty	Felony	J1317		MN0270300	20012230