

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 20A06686  
Court File No. 27-CR-20-22533

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**State of Minnesota,**  
Plaintiff,

**COMPLAINT**  
Summons

vs.

**BOGDAN VECHIRKO DOB: 03/02/1985**

c/o Kevin W. DeVore, DeVore Law Office, P.A.  
724 Bielenberg Dr, Ste 110  
Woodbury, MN 55125

Defendant.

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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: Threats of Violence - Reckless Disregard Risk**  
Minnesota Statute: 609.713.1, with reference to: 609.713.1  
Maximum Sentence: 5 YEARS AND/OR \$10,000  
Offense Level: Felony

Offense Date (on or about): 05/31/2020

Control #(ICR#): 20200349

Charge Description: That on or about 5/31/2020, in Minneapolis, Hennepin County, Minnesota, BOGDAN VECHIRKO did threaten to commit a crime of violence with the purpose of terrorizing another, and/or in reckless disregard of the risk of causing terror in another.

**COUNT II**

**Charge: Criminal Vehicular Operation - Bodily harm - Gross Negligence**  
Minnesota Statute: 609.2113.3(1), with reference to: 609.2113.3  
Maximum Sentence: 1 YEAR AND/OR \$3,000  
Offense Level: Gross Misdemeanor

Offense Date (on or about): 05/31/2020

Control #(ICR#): 20200349

Charge Description: That on or about 5/31/2020, in Minneapolis, Hennepin County, Minnesota, BOGDAN VECHIRKO did, by operating a motor vehicle in a grossly negligent manner, cause bodily harm to A.W.

## STATEMENT OF PROBABLE CAUSE

Complainant, a licensed peace officer with the Bureau of Criminal Apprehension, has investigated the facts and circumstances of this offense and believes the following establishes probable cause:

On May 31, 2020, more than a thousand peaceful protestors were gathered on the I-35W bridge in the area over the river just east of downtown Minneapolis, Hennepin County, Minnesota. While the protestors were sitting and standing on the bridge, a semi-truck with a tanker trailer approached the bridge from the south. The truck was caught on traffic cameras driving directly into the crowd at a high rate of speed. The truck was observed failing to stop for the crowd until an individual stumbled and fell, compelling the driver, identified as BOGDAN VECHIRKO, the defendant herein, to stop.

In addition to traffic cameras, officers collected a number of cell phone videos that captured portions of the incident. Protestors can be seen screaming and fleeing the bridge in a panic, in order to avoid being struck by the vehicle. The videos show that the defendant did not stop his vehicle but continued into the area of the crowd at a high rate of speed. Various collected videos show that in addition to the large crowd, there were multiple vehicles stopped on I-35W northbound as the road approached the bridge and that a number of vehicles were driving the wrong-direction up an entrance ramp to the freeway; all indicators that something was occurring up ahead.

Investigators obtained and used a similar semi-truck in order to drive the road in question. The reenactment was video recorded. The video shows that the defendant's line of sight would have given him sufficient time to stop his truck after viewing the crowd.

Investigators spoke to numerous people who were on the bridge at the time the defendant's truck came driving into the crowd. Numerous people reported that they thought they were going to be struck and/or killed. In the recovered videos, people can be seen rushing to the outside portions of the bridge to avoid the truck and some even jump off the bridge into grassy areas below.

At least one individual, A.W., suffered injuries as a result of her attempts to get out of the way of the truck. A.W. reported that she fell and suffered scrapes and abrasions to her leg. The injuries were photographed.

In a post-Miranda statement, the defendant admitted that he was kind of in a hurry. The defendant stated that when he saw the crowd, he hoped that if he went slow the crowd would let him past. The defendant stated that he stopped when he saw someone fall. The defendant acknowledged that he saw cars pulling off to the right of the highway as he approached. The defendant acknowledged that he could have stopped the truck sooner.

The thorough investigation showed that the defendant wanted to scare the crowd out of his path.

The defendant is not currently in custody.

## 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**

Jakob Hodapp  
Special Agent  
1430 Maryland Avenue E  
St. Paul, MN 55106  
Badge: 1396

Electronically Signed:  
10/21/2020 03:16 PM  
Beltrami County, Minnesota

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

**Prosecuting Attorney**

Dan Allard  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
10/21/2020 03:10 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 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: \$0.00

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: October 21, 2020.

**Judicial Officer**

Luis Bartolomei  
District Court Judge

Electronically Signed: 10/21/2020 03:18 PM

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

**COUNTY OF HENNEPIN  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**BOGDAN VECHIRKO**

Defendant

**LAW ENFORCEMENT OFFICER RETURN OF SERVICE**  
*I hereby Certify and Return that I have served a copy of this  
Summons upon the Defendant herein named.*

Signature of Authorized Service Agent:

## DEFENDANT FACT SHEET

**Name:** BOGDAN VECHIRKO  
**DOB:** 03/02/1985  
**Address:** c/o Kevin W. DeVore, DeVore Law Office, P.A.  
724 Bielenberg Dr, Ste 110  
Woodbury, MN 55125

**Alias Names/DOB:**

**SID:** MN12FF2175

**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 #:** 477713

**SILS Tracking No.** 3174103

**Alcohol Concentration:**

## STATUTE AND OFFENSE GRID

<b>Cnt Nbr</b>	<b>Statute Type</b>	<b>Offense Date(s)</b>	<b>Statute Nbrs and Descriptions</b>	<b>Offense Level</b>	<b>MOC</b>	<b>GOC</b>	<b>Controlling Agencies</b>	<b>Case Numbers</b>
1	Charge	5/31/2020	609.713.1 Threats of Violence - Reckless Disregard Risk	Felony	A9C43		MNBCA0000	20200349
	Penalty	5/31/2020	609.713.1 Threats of Violence - Reckless Disregard Risk	Felony	A9C43		MNBCA0000	20200349
2	Charge	5/31/2020	609.2113.3(1) Criminal Vehicular Operation - Bodily harm - Gross Negligence	Gross Misdemeanor	J2A51		MNBCA0000	20200349
	Penalty	5/31/2020	609.2113.3 Criminal Vehicular Operation - Bodily Harm - Penalty	Gross Misdemeanor	J2A51		MNBCA0000	20200349