

IN THE IOWA DISTRICT COURT FOR WOODBURY COUNTY

THE STATE OF IOWA,  Plaintiff,  vs.  BROOKS ROBERT OLSON,  Defendant.	CRIMINAL NO.   COMPLAINT and AFFIDAVIT
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Count 1

Said Defendant is accused of the crime of THEFT IN THE SECOND DEGREE, a Class D Felony, in violation of Iowa Code section 714.1(1) and 714.2(2), in that the Defendant on or about the first week of September, 2012, in Woodbury County, Iowa, took possession or control of the property of another, or property in the possession of another, with the intent to deprive the other of the property, the property having a value exceeding \$1,000.00, but not exceeding \$10,000.00.

Count 2

Said Defendant is accused of the crime of THEFT IN THE SECOND DEGREE, a Class D Felony, in violation of Iowa Code section 714.1(1) and 714.2(2), in that the Defendant on or about September 11, 2012, in Woodbury County, Iowa, took possession or control of the property of another, or property in the possession of another, with the intent to deprive the other of the property, the property having a value exceeding \$1,000.00, but not exceeding \$10,000.00.

Count 3

Said Defendant is accused of the crime of THEFT IN THE FIRST DEGREE, a Class C Felony, in violation of Iowa Code section 714.1(1) and 714.2(1), in that the Defendant on or about September 19 or 20, 2012, in Woodbury County, Iowa, took possession or control of the property of another, or property in the possession of another, with the intent to deprive the other of the property, the property having a value exceeding \$10,000.00.

Count 4

Said Defendant is accused of the crime of THEFT IN THE FIRST DEGREE, a Class C Felony, in violation of Iowa Code section 714.1(1) and 714.2(1), in that the Defendant on or about September 25 or 26, 2012, in Woodbury County, Iowa, took possession or control of the

property of another, or property in the possession of another, with the intent to deprive the other of the property, the property having a value exceeding \$10,000.00.

Count 5

Said Defendant is accused of the crime of BURGLARY IN THE THIRD DEGREE, a Class D Felony, in violation of Iowa Code section 713.1 and 713.6A(1), in that the Defendant on or about September 24, 2012, in Woodbury County, Iowa, while having the intent to commit a theft, assault and/or a felony therein, and while having no right, license or privilege to do so, entered or broke an occupied structure not open to the public and/or remained therein after it was closed to the public or after the defendant's right, license or privilege to be there had expired.

Count 6

Said Defendant is accused of the crime of BURGLARY IN THE THIRD DEGREE, a Class D Felony, in violation of Iowa Code section 713.1 and 713.6A(1), in that the Defendant on or about September 24, 2012, in Woodbury County, Iowa, while having the intent to commit a theft, assault and/or a felony therein, and while having no right, license or privilege to do so, entered or broke an occupied structure not open to the public and/or remained therein after it was closed to the public or after the defendant's right, license or privilege to be there had expired.

Count 7

Said Defendant is accused of the crime of THEFT IN THE THIRD DEGREE, a Aggravated Misdemeanor, in violation of Iowa Code section 714.1(1) and 714.2(3), in that the Defendant on or about September 24, 2012, in Woodbury County, Iowa, took possession or control of the property of another, or property in the possession of another, with the intent to deprive the other of the property, the property having a value exceeding \$500.00, but not exceeding \$1,000.00.

Count 8

Said Defendant is accused of the crime of BURGLARY IN THE THIRD DEGREE, a Class D Felony, in violation of Iowa Code section 713.1 and 713.6A(1), in that the Defendant on or about October 10, 2012, in Woodbury County, Iowa, while having the intent to commit a theft, assault and/or a felony therein, and while having no right, license or privilege to do so, entered or broke an occupied structure not open to the public and/or remained therein after it was closed to the public or after the defendant's right, license or privilege to be there had expired.

Count 9

Said Defendant is accused of the crime of BURGLARY IN THE THIRD DEGREE, a Aggravated Misdemeanor, in violation of Iowa Code section 713.1 and 713.6A(2), in that the Defendant on or about October 10, 2012, in Woodbury County, Iowa, while having the intent to commit a theft assault and/or a felony therein, and while having no right, license or privilege to do so, entered or broke an occupied structure which was an unoccupied motor vehicle not open to the public.

Count 10

Said Defendant is accused of the crime of THEFT IN THE SECOND DEGREE, a Class D Felony, in violation of Iowa Code section 714.1(1) and 714.2(2), in that the Defendant on or

about October 10, 2012, in Woodbury County, Iowa, took possession or control of the property of another, or property in the possession of another, with the intent to deprive the other of the property, the property having a value exceeding \$1,000.00, but not exceeding \$10,000.00.

Count 11

Said Defendant is accused of the crime of BURGLARY IN THE THIRD DEGREE, a Class D Felony, in violation of Iowa Code section 713.1 and 713.6A(1), in that the Defendant on or about October 13 or 14, 2012, in Woodbury County, Iowa, while having the intent to commit a theft, assault and/or a felony therein, and while having no right, license or privilege to do so, entered or broke an occupied structure not open to the public and/or remained therein after it was closed to the public or after the defendant's right, license or privilege to be there had expired.

Count 12

Said Defendant is accused of the crime of THEFT IN THE SECOND DEGREE, a Class D Felony, in violation of Iowa Code section 714.1(1) and 714.2(2), in that the Defendant on or about October 13 or 14, 2012, in Woodbury County, Iowa, took possession or control of the property of another, or property in the possession of another, with the intent to deprive the other of the property, the property having a value exceeding \$1,000.00, but not exceeding \$10,000.00.

Count 13

Said Defendant is accused of the crime of BURGLARY IN THE THIRD DEGREE, a Class D Felony, in violation of Iowa Code section 713.1 and 713.6A(1), in that the Defendant on or about October 13-15, 2012, in Woodbury County, Iowa, while having the intent to commit a theft, assault and/or a felony therein, and while having no right, license or privilege to do so, entered or broke an occupied structure not open to the public and/or remained therein after it was closed to the public or after the defendant's right, license or privilege to be there had expired.

Count 14

Said Defendant is accused of the crime of THEFT IN THE SECOND DEGREE, a Class D Felony, in violation of Iowa Code section 714.1(1) and 714.2(2), in that the Defendant on or about October 13-15, 2012, in Woodbury County, Iowa, took possession or control of the property of another, or property in the possession of another, with the intent to deprive the other of the property, the property having a value exceeding \$1,000.00, but not exceeding \$10,000.00.

Count 15

Said Defendant is accused of the crime of BURGLARY IN THE THIRD DEGREE, a Class D Felony, in violation of Iowa Code section 713.1 and 713.6A(1), in that the Defendant on or about October 13-15, 2012, in Woodbury County, Iowa, while having the intent to commit a theft, assault and/or a felony therein, and while having no right, license or privilege to do so, entered or broke an occupied structure not open to the public and/or remained therein after it was closed to the public or after the defendant's right, license or privilege to be there had expired.

Count 16

Said Defendant is accused of the crime of THEFT IN THE SECOND DEGREE, a Class D Felony, in violation of Iowa Code section 714.1(1) and 714.2(2), in that the Defendant on or about October 13-15, 2012, in Woodbury County, Iowa, took possession or control of the

property of another, or property in the possession of another, with the intent to deprive the other of the property, the property having a value exceeding \$1,000.00, but not exceeding \$10,000.00.

Count 17

Said Defendant is accused of the crime of THEFT IN THE SECOND DEGREE, a Class D Felony, in violation of Iowa Code section 714.1(1) and 714.2(2), in that the Defendant on or about October 13-15, 2012, in Woodbury County, Iowa, took possession or control of the property of another, or property in the possession of another, with the intent to deprive the other of the property, the property having a value exceeding \$1,000.00, but not exceeding \$10,000.00.

Count 18

Said Defendant is accused of the crime of BURGLARY IN THE THIRD DEGREE, a Aggravated Misdemeanor, in violation of Iowa Code section 713.1 and 713.6A(2), in that the Defendant on or about October 17, 2012, in Woodbury County, Iowa, while having the intent to commit a theft (assault)(felony) therein, and while having no right, license or privilege to do so, entered or broke an occupied structure which was an unoccupied motor vehicle not open to the public.

Count 19

Said Defendant is accused of the crime of BURGLARY IN THE THIRD DEGREE, a Aggravated Misdemeanor, in violation of Iowa Code section 713.1 and 713.6A(2), in that the Defendant on or about October 22, 2012, in Woodbury County, Iowa, while having the intent to commit a theft (assault)(felony) therein, and while having no right, license or privilege to do so, entered or broke an occupied structure which was an unoccupied motor vehicle not open to the public.

Count 20

Said Defendant is accused of the crime of THEFT IN THE FOURTH DEGREE, a Serious Misdemeanor, in violation of Iowa Code section 714.1(1) and 714.2(4), in that the Defendant on or about October 22, 2012, in Woodbury County, Iowa, took possession or control of the property of another, or property in the possession of another, with the intent to deprive the other of the property, the property having a value exceeding \$200.00, but not exceeding \$500.00.

Count 21

Said Defendant is accused of the crime of THEFT IN THE THIRD DEGREE, a Aggravated Misdemeanor, in violation of Iowa Code section 714.1(1) and 714.2(3), in that the Defendant on or about October 31, 2012, in Woodbury County, Iowa, took possession or control of the property of another, or property in the possession of another, with the intent to deprive the other of the property, the property having a value exceeding \$500.00, but not exceeding \$1,000.00.

Count 22

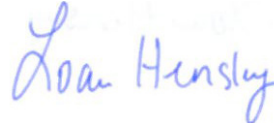
Said Defendant is accused of the crime of BURGLARY IN THE THIRD DEGREE, a Class D Felony, in violation of Iowa Code section 713.1 and 713.6A(1), in that the Defendant on or about November 4, 2012, in Woodbury County, Iowa, while having the intent to commit a

theft, assault and/or a felony therein, and while having no right, license or privilege to do so, entered or broke an occupied structure not open to the public and/or remained therein after it was closed to the public or after the defendant's right, license or privilege to be there had expired.

Count 23

Said Defendant is accused of the crime of THEFT IN THE FOURTH DEGREE, a Serious Misdemeanor, in violation of Iowa Code section 714.1(1) and 714.2(4), in that the Defendant on or about November 4, 2012, in Woodbury County, Iowa, took possession or control of the property of another, or property in the possession of another, with the intent to deprive the other of the property, the property having a value exceeding \$200.00, but not exceeding \$500.00.

THEREFORE, complainant requests that the Defendant, subject to bail or conditions of release, (1) be arrested or that other lawful steps be taken to obtain the Defendant's appearance in court or (2) be detained, if already in custody, pending further proceedings, and that the Defendant otherwise be dealt with according to law.



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Complainant  
Woodbury County Attorney's Office

AFFIDAVIT

I, the undersigned complainant, being first duly sworn on oath, do hereby depose and state that I believe the above-named Defendant committed the above-named public offense based upon the following facts known by me or told to me by other reliable persons: On or about the first week of September 2012, the defendant took a Polaris Razor ATV style vehicle belonging to Pat Luse from his residence on Derocher Path in Sioux City, Woodbury County Iowa. On or about September 11, 2012 the defendant took a Polaris Sportsman ATV belonging to Mark Richardson from his residence in Lawton, Woodbury County, Iowa. The Defendant did not have permission to take these ATVs and intended to permanent deprive the owners of them. The total value of the ATVs exceeded \$1000 but did not exceed \$10,000. On or about the 19<sup>th</sup> or 20<sup>th</sup> day of September 2012, the defendant took a trailer along with all the items inside from a locked gated lot in Luton, Woodbury County, Iowa. On or about the 25<sup>th</sup> or 26<sup>th</sup> day of September 2012, the defendant took another trailer with all its contents from a lot near 2523 Port Neal Road, in Woodbury County, Iowa. The defendant did not have permission to take either of these trailers and the value of the trailers and its contents exceeded \$10,000. On or about the 24<sup>th</sup> day of September 2012, the defendant broke the padlock and went into an outbuilding located at 2523 Port Neal Road in Woodbury County, Iowa. The Defendant stole beer and food items from this building. On or about the 24<sup>th</sup> day of September 2012, the defendant broke off the padlock of a building located near 2523 Port Neal Road in Woodbury County, Iowa and took chainsaws, acetylene tanks, and craftsman drills. The value of these items exceeded \$500 but did not exceed \$1000. On or about the 10<sup>th</sup> day of October 2012, the defendant broke into a storage unit and three vehicles located at 1889 Highway 20 in Woodbury County, Iowa. The

defendant took from the storage unit a diamond plated toolbox that goes on the back of a pickup truck and took from the vehicles jumper cables, signs, ammunition, and bolts. The value of the items taken exceeded \$1000 but did not exceed \$10,000. On or about the 13<sup>th</sup> and 14<sup>th</sup> day of October 2012, the defendant broke into a construction trailer owned by RJ Tide Construction parked at the Pilot Center in Sioux City, Woodbury County, Iowa. The defendant took from this trailer a Husqvarna buddy saw, a Hilti skill saw, a Hilti 18 volt impact drill, a Hitachi impact drill driver, and a five gallon gas can filled with gas. The value of these items taken exceeded \$1000 but did not exceed \$10,000. On or about the 14<sup>th</sup> and 15<sup>th</sup> day of October 2012, the defendant broke the lock and went into a construction trailer owned by Nelson Engineering parked at 7101 Southbridge Road in Woodbury County. The defendant took from this trailer two Honda generators, three battery operated impacts with chargers, two battery operated drills with chargers, four packs of drill bits and drivers sets, and one Sawsall. The total value of items taken exceeded \$1000 but did not exceed \$10,000. On or about the 14<sup>th</sup> and 15<sup>th</sup> day of October 2012, the defendant broke into two construction trailers owned by Laser Pro that were parked at 7101 Southbridge Road in Woodbury County, Iowa. The defendant took from the trailers five dewalt cordless screw guns and one Hilti electric hammer drill. The total value of the items taken exceeded \$1000 but did not exceed \$10,000. On or about the 14<sup>th</sup> and 15<sup>th</sup> day of October 2012, the defendant took from a trailer owned by Bedrock Gravel parked at 7101 Southbridge Road in Woodbury County, Iowa, 1000 gallons of diesel fuel, and air compressor, and various other construction items. The value of these items taken exceeded \$1000 but did not exceed \$10,000. On or about the 17<sup>th</sup> day of October 2012, the defendant broke into a Suburban work truck located at 1889 Highway 20 in Woodbury County and took from it a fire extinguisher, jumper cables, and a first aid kit. On or about the 22<sup>nd</sup> day of October 2012, the defendant broke into a work truck belonging to Elmquist towing that was parked at 1903 Highway 20 in Woodbury County and took from it GPS used for their towing service. The value of the GPS exceeded \$200 but does not exceed \$500. On or about the 31<sup>st</sup> day of October 2012, the defendant had stolen tires from a business in South Dakota and sold these tires to John Stewart. The defendant knew the tires were stolen and the total value exceeded \$500 but did not exceed \$1000. On or about the 4<sup>th</sup> day of November 2012 the defendant broke the lock on a trailer belonging to Gregory Thode located at 1603 Buchanan Avenue in Woodbury County, Iowa. The defendant took from this trailer approximately 18 duck decoys. The value of the duck decoys taken exceeded \$200 but did not exceed \$500. The defendant did not have permission to be in any of the locations listed above and did not have permission to take any of the items taken. He took all these items with the intent to permanently deprive the owners of the items.

*Loan Hensley*

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Complainant

SUBSCRIBED and SWORN to before me by the person signing this Complaint and  
Affidavit on \_\_\_\_\_, 20\_\_\_\_.

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Notary Public



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