

State of Minnesota  
County of OlmstedDistrict Court  
3rd Judicial DistrictProsecutor File No. 0550072410  
Court File No. 55-CR-23-50

State of Minnesota,

Plaintiff,

**COMPLAINT**

Order of Detention

vs.

**MUSTAFA RAHSHAD BUSH DOB: 05/26/1983**939 9 1/2 ST SE  
Rochester, MN 55904

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: Murder - 2nd Degree - With Intent-Not Premeditated**

Minnesota Statute: 609.19.1(1), with reference to: 609.11.5(a)

Maximum Sentence: 3 to 40 years

Offense Level: Felony

Offense Date (on or about): 12/25/2022

Control #(ICR#): 22932460

Charge Description: On or about December 25, 2022, in the County of Olmsted, Minnesota, Mustafa Rahshad Bush did cause the death of Victim with intent to effect the death of Victim and another but without premeditation.

**COUNT II****Charge: Murder - 2nd Degree - Without Intent - While Committing a Felony**

Minnesota Statute: 609.19.2(1), with reference to: 609.11.5a

Maximum Sentence: 3 to 40 years

Offense Level: Felony

Offense Date (on or about): 12/25/2022

Control #(ICR#): 22932460

Charge Description: On or about December 25, 2022, in the County of Olmsted, Minnesota, Mustafa Rahshad Bush did cause the death of Victim without intent to effect the death of any person, while committing or attempting to commit a felony.

**COUNT III****Charge: Drugs - 1st Degree - Possess 50 grams or more - cocaine or methamphetamine**

Minnesota Statute: 152.021.2(a)(1), with reference to: 152.021.3(a)

Maximum Sentence: 30 years or \$1,000,000 fine, or both

Offense Level: Felony

Offense Date (on or about): 12/25/2022

Control #(ICR#): 22932460

Charge Description: On or about December 25, 2022, in the County of Olmsted, Minnesota, Mustafa Rahshad Bush did possess one or more mixtures of a total weight of 50 grams or more containing cocaine, a schedule II controlled substance. Mustafa Rahshad Bush or an accomplice sold or possessed 100 or more gram or 500 or more dosage units of a mixture containing the controlled substance at issue.



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The Complainant states that the following facts establish probable cause:

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Your complainant is a licensed peace officer employed by the Olmsted County Sheriff's Office. In that capacity your Complainant has reviewed the police reports relating to Mustafa Rahshad Bush, the above-named defendant, and the allegations contained therein. Based upon that information, your complainant believes the following to be true and correct.

On 12/26/2022, at approximately 1624 hours, Olmsted County Sheriff's Deputy Heeren was dispatched to a Suspicious call. Witness 1, fully identified in the relevant police reports, called 911 to report that she located what she believed to be a deceased person near the intersection of River Bluff LN NW and West River Rd NW in the Township of Cascade, Olmsted County. Deputy Heeren arrived and observed an apparent deceased nude female located in the east ditch of West River Rd NW approximately 100-150 yards south of River Bluffs LN NW. The scene was secured.

Deputy Heeren conducted an interview with Witness 1. Witness 1 stated she was walking her dog on the east side of West River Road NW when the dog stopped and was tugging. She walked back a little and noticed what she believed to be was an arm from a human. She called her mother, who arrived on scene before deputies, and confirmed what they saw. Witness 1 called 911.

OCSO Investigator Thomas Olson responded to the scene along with other patrol and investigative members of the OCSO. Crime scene tape had been placed around an area from the roadway to the tree line starting about 50 yards south of River Bluff LN and extending roughly 75 yards south from there. The Bureau of Criminal Apprehension (BCA) was called to assist processing the scene and collect potential forensic evidence.

The weather during the past 24-48 hours and continuing in Rochester and Olmsted County was blizzard like conditions with intermittent snow, blowing and drifting snow and extreme wind chill temperatures.

Inv. Olson noted what appeared to be blood along the shoulder of the road. Some of the blood appeared to have been spread north along the shoulder by a snowplow. Inv. Olson created a walking path into the scene from the NW corner of the police tape to not disturb any evidence. Inv. Olson observed a nude female decedent in the supine position in the snow, approximately 7-10 yards down into the ditch from the roadway. The decedent was positioned with her head to the west and her feet to the east, perpendicular to the road. There was what appeared to be blood visible on the front of the decedent's neck and a light dusting of snow over parts of her body.

From the shoulder of the road to where the decedent was located, a continuous drag mark pattern was visible in the snow. The drag mark pattern suggests the decedent had been pulled feet first down into the ditch. Along the north side of the drag mark pattern were track marks in the snow consistent with a walking pattern that started at the decedent's feet and went back towards the road. The whole scene appeared to be within the public right-of-way. Blood was also observed in the drag mark pattern. While documenting the decedent in the scene, a penetrating impact mark was noted on the decedent's right forehead area. The decedent was left untouched until the Medical Examiner (ME) arrived.

When the BCA Crime Scene Team arrived, they began to process the scene. Once the BCA had completed scene photographs and scans, the Medical Examiner arrived to collect the body. When the decedent was brought up to the road for transport, Detective Johns believed she recognized the decedent's facial features. Detective Johns compared the decedent to in house information known to belong to Kimberly Ann Robinson (DOB 12/31/1980). The decedent appeared to match Kimberly Robinson.

Captain Schueller made notification to Robinson's brother at approximately 0005 hours on 12/27/2022. He provided Captain Schueller the phone number of \*\*\*-\*\*\*-6239 for Robinson. Robinson last sent her brother a text message at about 2140 hours on 12/24/2022.

Det. Johns ran the decedent's name and date of birth through state and local records. The decedent's address was 939 9 ½ ST SE in Rochester, MN 55904. Records indicate this home was lived in by **Mustafa Rahshad Bush**, DOB 5/26/1983, hereinafter Defendant. On 12/27/2022, at about 0030 hours, investigators from the Olmsted County Sheriff's Office attempted to make contact at that residence. No one was home.

On 12/27/2022, Inv. Olson conducted an interview with the decedent's mother PJW. PJW advised that Mustafa Bush was Robinson's current significant other and have been in an "on-again/off-again" relationship and provided the following statement (summarized):

Ms. Robinson had been living with Mustafa Bush at 939 9 ½ ST SE in Rochester, MN 55904. They had been dating for approximately 2 years. PJW was aware that Ms. Robinson and Bush had been recently arguing. Ms. Robinson came to PJW's house for Christmas Eve on 12/24/22. Ms. Robinson was there from approximately 6-9 p.m. and she left with her adult son. Ms. Robinson told her mother she had a recent fight with Mustafa Bush and was staying with a friend. Ms. Robinson was wearing a brown/tan coat. Ms. Robinson did not have a car.

Inv. Olson interviewed Ms. Robinson's adult son, CMVW. CMVW provided the following statement (summarized):

CMVW picked up Ms. Robinson at her boyfriend's house around 1730 hours. CMVW confirmed the boyfriend's identity as the Defendant and the same 9 ½ St. address. Defendant was there when CMVW picked up Ms. Robinson. CMVW left with Ms. Robinson and went to a Kwik Trip for gas. Defendant followed separately and paid for gas for CMVW. CMVW and Ms. Robinson left to go to the holiday celebration at PJW's home.

At approximately 2030 hours, CMVW drove Ms. Robinson to a friend's apartment in the 1600 block of 4<sup>th</sup> St. SE Rochester. During the drive, CMVW overheard Ms. Robinson on the phone asking for a "T-shirt". Investigators are aware that "T-shirt" is street slang for 1.75 g of methamphetamine. CMVW also noted that he frequently communicated with Ms. Robinson via text or phone calls using Facebook Messenger.

Investigators later retrieved surveillance video from the Kwik Trip that confirmed Defendant and Ms. Robinson were together at the store as noted. Defendant appeared to be driving a small dark colored 4-door sedan and investigators took note of the clothing he was wearing.

On 12/27/2022, at about 1034 hours, Detective D. Johnson reviewed phone records for 6239. Detective D. Johnson noted a text message consistent with that being reported above to decedent's brother. The last outgoing text message on the phone records from 6239 was sent to \*\*\*-\*\*\*-2481 on 12/24/2022 at 2343 hours. Inv Olson ran 2481 on a computer database and the number is associated to Defendant's sister TB. TB's listed address is in the 1500 block of 50<sup>th</sup> St. NW, Rochester, MN.

Detective D. Johnson also noted numerous communications in the records for 6239 to phone number \*\*\*-\*\*\*-1826. Investigators learned that 1826 is a phone number associated with JS with an address in the 1600 block of 4<sup>th</sup> St. SE, Rochester, MN.

Detective D. Johnson also located a Facebook account that appears to be associated with decedent. Johnson noted the last public post by Ms. Robinson on that account was placed on 12/24/2022 at 2201.

On 12/27/22 at approximately 2022 hours, Inv. Olson received a message from a caller with information regarding Kim Robinson. Inv. Olson returned the call and spoke with SC, a female fully identified in the relevant reports. SC provided the following information (summarized):

SC knows Defendant. SC was staying at 1403 Marion Rd. SE, #3, Rochester. On 12/25/22 at

approximately 2345 hours, Defendant knocked on the door and asked for help pushing his car out of the snow. His car was a blue 4-door sedan. SC and another person helped unstuck the car and Defendant drove off. At about 0330 hours on 12/26/22, Defendant returned. SC observed Defendant with a large suitcase in the front area of his car. SC was on the phone and passed her phone to Defendant. SC attempted to help pick up the suitcase, but it was too heavy for her. SC later went to the burn pit at that address and observed burnt clothing and glasses frames.

Investigators are aware that a burn pit is at the location described by SC and is commonly known by residents of the area as a place used to dispose of unwanted items.

On December 27, 2022, at approximately 1300 hours, members of the Southeast Minnesota Violent Crime Enforcement Team (SEMV CET) conducted surveillance of 939 9 ½ ST SE, Rochester, MN 55904. Investigators observed Defendant was carrying items from the residence to his vehicle, MN AUS069, a blue 2017 Kia Optima, and from the vehicle to his residence.

On December 28, 2022, investigators conducted surveillance on Defendant and related persons. Investigators observed Defendant and other persons transferring items between Defendant's car, AUS069, and other cars including MN Lic No. \*\*\*192 and MN Lic. No. \*\*\*WDZ (fully identified in the relevant police reports). Investigators also noted that the coat Defendant had been seen wearing was transferred to \*\*\*WDZ.

Following those interactions, Defendant came to the Law Enforcement Center with a family member, driven in \*\*\*192. Investigators contacted the driver who acknowledged that Defendant's belongings from AUS069 were in his vehicle. The driver consented to a search of \*\*\*192 and the bags/items identified as Defendant's were removed from \*\*\*192 by investigators.

Pursuant to a search warrant, investigators inspected the contents of the bags/items removed from \*\*\*192. In a bag investigators found clothing belonging to Defendant. Some of the clothing items were consistent with clothing seen on Defendant when he was seen with Ms. Robinson. In the same bag with Defendant's clothing, identification items of the defendant were found as well as credit/debit cards in Defendant's name. In the same bag was found approximately ½ pound of a substance field tested to be cocaine.

On December 29, 2022, Defendant's vehicle, AUS069 was searched pursuant to warrant. Blood evidence was found in several locations, particularly the front passenger area, and on the driver's seat belt as well. Investigators also noticed areas of pooling of blood in the passenger compartment. Forensic testing is not completed on the samples to determine source.



Women's lingerie, women's underwear and other items of women's clothing and makeup were found in Defendant's vehicle when searched. At Defendant's home, 939 9 ½ St. SE, pursuant to search warrant, investigators found women's clothing as well as a COVID test with Ms. Robinson's name on it.

On the afternoon of December 28, 2022, members of the SEMVCET drove to the area of 1401 Marion RD SE/1403 Marion RD SE and viewed the fire pit. Investigator J. Johnson advised the burn pit appeared to have had a recent fire(s) and noticed there was no snow around the fire pit, which is indicative of a recent fire.

On 12/28/22, Inv. Olson was made aware of an interaction Rochester Police Department officers had with TB, fully identified in the relevant police reports as the sister of Defendant. TB indicated to RPD officers she had called to talk to officers about her brother. Defendant was present as well and TB tried to be discrete from her brother as she spoke to officers. TB indicated that she believed her brother had been drinking and needed to go to jail. When asked why, TB indicated Defendant shared with her he had hurt his girlfriend. Because Defendant was close by, TB could not give any more information at that time. This interaction took place at the home address of TB in NW Rochester.

Det. D. Johnson received additional phone records for the phone number associated with Ms. Robinson (6239), as well as a phone associated with Defendant, \*\*\*-\*\*\*-0649. Using forensic technology, Det. D. Johnson was able to approximate recent device locations.

Det. D. Johnson's review of the device location information showed that during the morning and daytime of 12/24/22, Ms. Robinson's device locations are consistent with information provided by witnesses above through 2030 hours. At approximately 2215 hours this device appears to be around 939 9 ½ St. SE. At that approximate time, the device associated with Defendant, 0649, appears to be in the same location.

Det. D. Johnson noted that at approximately 2227 hours Ms. Robinson's device is moving north through Rochester. From 2242 hours to 2343 hours this device appears to be in the area of TB's home in NW Rochester. This device appears to stay in the area of TB's home until 0400 on 12/25/22. The device associated with Defendant appears to track the same path and times as if both are traveling together.

At approximately 0400 hours on 12/25/22, the devices appear to move to the area of 939 9 ½ St. SE. At approximately 2045 hours, the device associated with Defendant stops communicating with the service provider. Det. D. Johnson knows from training and experience that is likely because the device is somehow powered down or taken off service.

At about the same time, 2045 hours on 12/25/2022, the device associated with Ms. Robinson appears to

travel between 939 9 ½ St SE and the area around 1400 block of Marion Rd SE Rochester, MN. The device travels from SE Rochester east, northbound past the Silver Creek Reservoir, and west back towards NW Rochester until the device stops communicating at 2100 hours on 12/25/2022. The last communication from the device comes from the area near West River Road in NW Rochester.

On 12/28/22, investigators conducted surveillance on areas associated with other members of Defendant. Investigators observed Defendant and Defendant's blue vehicle in the 000 block of 7<sup>th</sup> St. NW, Rochester. Investigators observed Defendant moving multiple bags from his vehicle into another vehicle. Investigators further followed Defendant's vehicle to Defendant's address on 9 ½ St. SE. Local surveillance camera footage and surveillance indicates the Defendant appears to be moving several items/bags between the two locations using his vehicle and that of a family member.

On 12/30/22, investigators became aware of a suspicious social media conversation related to the death of Ms. Robinson. Investigators learned the identity of the poster, JTC, fully identified in the relevant police reports. JTC told investigators the following (summarized):

JTC met Defendant in prison. On 12/26/22, Defendant came to JTC's residence in the 400 block of 9<sup>th</sup> St. NW, Rochester. While there, Defendant washed an outfit of clothing, cut JTC's hair, picked up a laptop, and asked JTC to work on a small camera. Defendant also parked his car in the garage and appeared to be cleaning out his car in the garage. Defendant's car was full of stuff.

On 12/28/22, an autopsy was conducted on Ms. Robinson. Preliminary findings include that she suffered a through and through gunshot wound to her neck, traversing from left to right. This wound appears to have caused her death. Ms. Robinson also had a contusion on her forehead that appeared deep and to the bone of her skull with collateral markings along the bridge of her nose and surrounding tissues. Ms. Robinson also had bruising around her eye.

In a further interview, TB confirmed that Defendant and Ms. Robinson were together at her home in the 1500 block of 50<sup>th</sup> St. NW, Rochester, MN during the evening and early morning hours of Christmas Eve and Christmas Day.

In 2007, Mustafa Rahshad Bush was convicted of Murder in the Second Degree in Olmsted County District Court File No. 55-CR-06-4137. Having served 2/3 of his sentence in prison, he was placed on supervised release in Olmsted County on or about March 2020.



PLEASE TAKE NOTICE: YOU MUST APPEAR FOR EVERY COURT HEARING REGARDING THIS CASE. FAILURE TO APPEAR FOR COURT IS A CRIMINAL OFFENSE AND MAY RESULT IN ADDITIONAL CRIMINAL CHARGES BEING IMPOSED AND PUNISHED AS PROVIDED IN MINNESOTA STATUTES SECTION 609.49.



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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.

<b>Complainant</b>	James Schueller Captain 101 4th Street SE Rochester, MN 55904-3718 Badge: 1003	Electronically Signed: 01/03/2023 06:30 PM Olmsted County, Minnesota
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Being authorized to prosecute the offenses charged, I approve this complaint.

<b>Prosecuting Attorney</b>	Mark A. Ostrem Olmsted County Attorney 151 4th Street SE Government Center - 3rd Floor Rochester, MN 55904 (507) 328-7600	Electronically Signed: 01/03/2023 04:50 PM
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55-CR-23-50  
**FINDING OF PROBABLE CAUSE**

Filed in District Court  
State of Minnesota  
1/4/2023

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 as directed in the Notice of Hearing before the above-named court 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: \$  
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: January 4, 2023.

**Judicial Officer**

Joseph Bueltel  
Judge

Electronically Signed: 01/04/2023 08:13 AM

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

**COUNTY OF OLMSTED  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**Mustafa Rahshad Bush**

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:

55-CR-23-50  
**DEFENDANT FACT SHEET**

*Filed in District Court  
State of Minnesota  
1/4/2023*

**Name:** Mustafa Rahshad Bush  
**DOB:** 05/26/1983  
**Address:** 939 9 1/2 ST SE  
Rochester, MN 55904

**Alias Names/DOB:**

**SID:** MN02404774

**Height:**

**Weight:**

**Eye Color:**

**Hair Color:**

**Gender:**

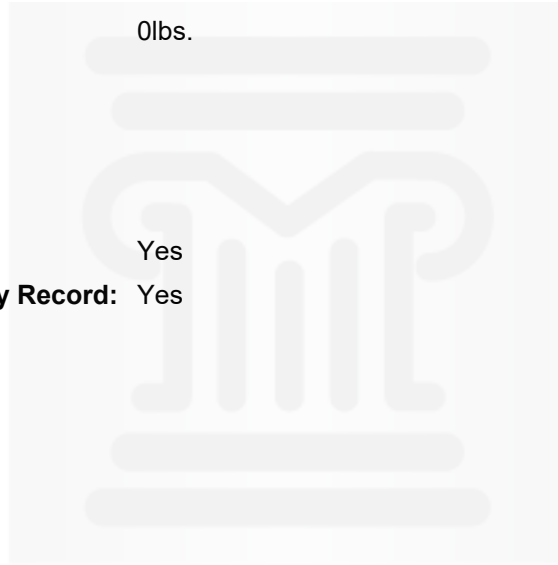
**Race:**

**Fingerprints Required per Statute:** Yes

**Fingerprint match to Criminal History Record:** Yes

**Driver's License #:**

**Alcohol Concentration:**



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55-CR-23-50  
**STATUTE AND OFFENSE GRID**

Filed in District Court  
 State of Minnesota  
 1/4/2023

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	12/25/2022	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2012		MN0550000	22932460
	Modifier	12/25/2022	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2012		MN0550000	22932460
2	Charge	12/25/2022	609.19.2(1) Murder - 2nd Degree - Without Intent - While Committing a Felony	Felony	H2H12		MN0550000	22932460
	Modifier	12/25/2022	609.11.5a Minimum Sentences of Imprisonment-Drug Offenses with Weapon	Felony	H2H12		MN0550000	22932460
3	Charge	12/25/2022	152.021.2(a)(1) Drugs - 1st Degree - Possess 50 grams or more - cocaine or methamphetamine	Felony	DD450		MN0550000	22932460
	Penalty	12/25/2022	152.021.3(a) Drugs - 1st Degree - Sale/Possession - Penalty - 30 Years/\$1,000,000.	Felony	DD450		MN0550000	22932460

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