HMJ:hcs

AO 91 (Rev. 11/11) Criminal Complaint 2025R00345

UNITED STATES DISTRICT COURT for the

District of Minnesota

UNITED STATES OF AMERICA

Case No. 25-mj-376 (JFD)

v.

FILED UNDER SEAL PURSUANT TO COURT ORDER

VANCE LUTHER BOELTER

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

COUNT ONE

(Stalking of Melissa Hortman – Use of Interstate Facilities)

On or about June 14, 2025, in the State and District of Minnesota and elsewhere, VANCE LUTHER BOELTER, the defendant, with the intent to kill, injure, harass, intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate another person, used an interactive computer service, electronic communication service, and electronic communication system of interstate commerce, and a facility of interstate or foreign commerce, to engage in a course of conduct that placed that person in a reasonable fear of the death of and serious bodily injury to that person and that person's spouse, and in the course of engaging in such conduct caused the death of that person and that person's spouse, to wit, BOELTER used a GPS navigation system, interstate wires, and the Internet to plan and carry out the stalking, shooting, and killing of Melissa Hortman and Mark Hortman in Brooklyn Park, Minnesota, all in violation of Title 18, United States Code, Sections 2261A(2)(A) and 2261(b)(1).

COUNT TWO

(Stalking of John Hoffman – Use of Interstate Facilities)

On or about June 14, 2025, in the State and District of Minnesota and elsewhere, VANCE LUTHER BOELTER, the defendant, with the intent to kill, injure, harass, intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate another person, used an interactive computer service, electronic communication service, and electronic communication system of interstate commerce, and a facility of interstate or foreign commerce, to engage in a course of conduct that placed that person in a reasonable

fear of the death of and serious bodily injury to that person, that person's spouse, and that person's immediate family member, and in the course of engaging in such conduct caused permanent disfigurement and life threatening bodily injury to that person and that person's spouse, to wit, BOELTER used a GPS navigation system, interstate wires, and the Internet to plan and carry out the stalking, shooting, and attempted killing of John Hoffman and Yvette Hoffman in Champlin, Minnesota, all in violation of Title 18, United States Code, Sections 2261A(2)(A) and 2261(b)(2).

COUNT THREE

(Murder of Melissa Hortman Through Use of a Firearm)

On or about June 14, 2025, in the State and District of Minnesota and elsewhere, VANCE LUTHER BOELTER, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the stalking offense charged in Count One, knowingly used and carried a firearm, and in furtherance of such crimes, possessed a firearm, and in the course of that crime caused the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, BOELTER shot and killed Melissa Hortman in Brooklyn Park, Minnesota, all in violation of Title 18, United States Code, Section 924(j).

COUNT FOUR

(Murder of Mark Hortman Through Use of a Firearm)

On or about June 14, 2025, in the State and District of Minnesota and elsewhere, VANCE LUTHER BOELTER, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the stalking offense charged in Count One, knowingly used and carried a firearm, and in furtherance of such crimes, possessed a firearm, and in the course of that crime caused the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, BOELTER shot and killed Mark Hortman in Brooklyn Park, Minnesota, all in violation of Title 18, United States Code, Section 924(j).

COUNT FIVE

(Shooting of Melissa and Mark Hortman - Firearms Offense)

On or about June 14, 2025, in the State and District of Minnesota and elsewhere, VANCE LUTHER BOELTER, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the stalking offense charged in Court One, knowingly used and carried a firearm, and in furtherance of such crimes, possessed a firearm, which was brandished and discharged, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i), (ii), (iii).

COUNT SIX

(Shooting of John and Yvette Hoffman - Firearms Offense)

On or about June 14, 2025, in the State and District of Minnesota and elsewhere, VANCE LUTHER BOELTER, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the stalking offense charged in Count Two, knowingly used and carried a firearm, and in furtherance of such crimes, possessed a firearm, which was brandished and discharged, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i), (ii), (iii).

I further state that I am an FBI Special Agent and that this complaint is based on the following facts: SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: \(\subseteq Yes \) \(\subseteq No

Complainant's signature

SUBSCRIBED and SWORN before me by reliable electronic means (FaceTime and email) pursuant to Fed. R. Crim. P. 41(d)(3).

Terry A. Getsch

FBI

Printed name and title

June 15, 2025

City and State: St. Paul, MN

The Honorable John F. Docherty United States Magistrate Judge

Printed Name and Title

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

Case No. 25-mj-376 (JFD)

V.

VANCE LUTHER BOELTER

FILED UNDER SEAL PURSUANT TO COURT ORDER

AFFIDAVIT OF TERRY GETSCH

- I am a Special Agent of the United States Department of Justice, Federal Bureau of Investigation (FBI), and have been so employed since 2018. I am currently assigned to the Minneapolis Field Office under the Violent Crime Squad where my investigative responsibilities include the criminal investigation of federal violent crimes. Prior to my assignment in the Minneapolis Field Office, for four years I was assigned to the Seattle Field Office where I investigated violent crime in Indian Country among other FBI firearms-related investigations. I have completed the FBI Academy, Indian Country Basic Investigators Training Program, and a Georgia Peace Officer's Academy in addition to being previously employed as a municipal police officer and detective in the State of Georgia from 2014 to 2018.
- 2. I am an "investigative or law enforcement officer" of the United States within the meaning of 18 U.S.C. § 2510(7), and I am empowered by 18 U.S.C §§ 3052 and 3107 to conduct investigations of, and to make arrests for, violations of federal criminal statutes.

3. I make this affidavit for the limited purpose of establishing probable cause in support of issuing a complaint and arrest warrant for Vance Luther Boelter for: stalking, in violation of 18 U.S.C. § 2261A(2)(A); use of a firearm to murder during and in relation to stalking, in violation of 18 U.S.C. § 924(j); and discharge of a firearm during and in relation to stalking, in violation of 18 U.S.C. § 924(c).

PROBABLE CAUSE

4. As described below, Vance Luther Boelter embarked on a planned campaign of stalking and violence, designed to inflict fear, injure, and kill members of the Minnesota state legislature and their families. After taking deliberate steps to research his victims and prepare for that campaign, Boelter traveled to the homes of at least four public officials during the early morning hours of June 14, 2024. Disguised as a police officer, and heavily armed with firearms and body armor, Boelter approached those officials' homes under the guise of lawful authority. That morning, Boelter murdered two people and seriously injured two others.

I. Boelter's Preparation for His Stalking and Murderous Campaign

5. Evidence uncovered in this investigation indicates that Boelter extensively planned his stalking, murders, and attempted murders. As discussed below, Boelter's preparation efforts included identifying several websites that allow users to search for the personal information of others, like home addresses and family member names. Boelter also made lists containing the names and home addresses of many Minnesota public officials, mostly or all Democrats.

- 6. He found websites that sold hyper-realistic silicone masks, which look like the mask Boelter wore during, at least, his shooting of John Hoffman, a Senator in the Minnesota State Senate, and his wife. And he purchased materials from Fleet Farm for use in his shootings, including flashlights and resources that could be used to create the type of fake "POLICE" license plate found on Boelter's SUV. Boelter drove that SUV to the home of Minnesota House of Representatives Speaker Emerita Melissa Hortman, where Boelter shot and killed Representative and Mr. Hortman.
- 7. As described below, Boelter undertook these acts and others in preparation for, in furtherance of, and with the intent to kill, injure, harass, and intimidate Minnesota elected officials.

II. Champlin, Minnesota: Attempted Murder of State Senator John Hoffman

- 8. In the early morning hours of June 14, 2025, Boelter drove in a black SUV, equipped with law-enforcement style emergency lights, to the home of Minnesota State Senator John Hoffman in Champlin, Minnesota.
- 9. Video footage from Senator Hoffman's home depicted Boelter approaching the front door dressed to impersonate a law enforcement officer, wearing a black tactical vest and holding a flashlight. He wore a flesh-colored mask covering his entire head.



Boelter knocking on the front door of the Hoffman household

- 10. As shown in that footage, and as described later by multiple members of the Hoffman family, Boelter knocked on the door. He shouted repeatedly, "This is the police. Open the door."
- 11. In response to Boelter's shouting, one or both of Senator and Mrs. Hoffman answered the door. According to a statement later provided to law enforcement by Mrs. Hoffman, Boelter said there had been a shooting reported inside the house and he asked whether the Hoffmans had any guns. Senator Hoffman responded that there were, but that all firearms were locked away.
- 12. According to Mrs. Hoffman, at some point in this exchange, she realized that Boelter—who had been shining a flashlight toward the Hoffmans, impairing their view of Boelter—was wearing a mask. Upon realizing this, one or both of the

Hoffmans told Boelter that Boelter was not a real police officer. Boelter responded by saying something like: "this is a robbery." Mrs. Hoffman reported that Senator Hoffman tried to push Boelter backward through the front door, at which point Boelter shot Senator Hoffman repeatedly. Mrs. Hoffman attempted to shut Boelter outside the home by shutting the door on him, but Boelter then shot Mrs. Hoffman repeatedly.

- 13. At approximately 2:06 a.m., Senator Hoffman's daughter called 911 to report that her parents had been shot.
- 14. Law enforcement responded and provided medical aid to Senator and Mrs. Hoffman, who were transported to a local hospital with multiple gunshot wounds. Although they suffered critical gunshot wounds, Senator and Mrs. Hoffman were stabilized.

III. Maple Grove, Minnesota: Home of Minnesota Public Official 1

15. After repeatedly shooting the Hoffmans, Boelter traveled to the home of another Minnesota elected representative, Public Official 1, in Maple Grove, Minnesota.

16. Video footage from surveillance cameras at Public Official 1's home showed Boelter repeatedly ringing the home's doorbell at approximately 2:24 a.m. Boelter wore a black tactical vest bearing a badge resembling those worn by law enforcement. While ringing the doorbell, Boelter loudly said, "This is the police. Open the door. This is the police. We have a warrant." He repeated the command several times.





Boelter knocking on the front door of Public Official 1's home

17. Public Official 1 and her family were not at home and did not answer the door. Boelter left the residence.

IV. New Hope, Minnesota: Home of Public Official 2

18. Later that night, local law enforcement in New Hope, Minnesota, learned of the shooting at Senator Hoffman's home and dispatched an officer to the

New Hope home of another Minnesota elected representative, Public Official 2, to conduct a safety check.

19. At approximately 2:36 a.m., an officer encountered a man, now believed to have been Boelter, sitting in the driver's side seat of a black SUV parked down the street from Public Official 2's home. The officer believed that the SUV, which resembled a squad car and was equipped with a police-style light bar, was in fact a law enforcement officer providing protection for Public Official 2.



Image from New Hope Police Department dash camera footage

20. The officer reported that the individual sitting in the black SUV was a bald, white male, staring straight ahead. The officer tried to speak with that man, but he continued staring straight ahead and did not respond. The officer drove the rest of the distance to Public Official 2's residence, saw no signs of distress, and waited there until additional law enforcement officers joined her. By the time they did, the dark SUV had left the area.

V. Brooklyn Park, Minnesota: Murder of Minnesota State Representative Melissa Hortman and Her Husband

- 21. Around 3:30 a.m., local law enforcement, having learned of the shooting at Senator Hoffman's home in Champlin, went to the home of Minnesota State Representative Melissa Hortman in Brooklyn Park, Minnesota, to conduct a safety check.
- 22. Upon arriving, law enforcement saw a black Ford Explorer SUV parked outside the home. The black SUV resembled a law enforcement squad car and was equipped with police-style lights. Those lights were on and flashing.



Image from law enforcement footage upon their arrival at the Hortman household

23. The SUV's license plate had been replaced with a fake "POLICE" license plate.



License plate on Boelter's SUV

24. Law enforcement arriving at Representative Hortman's home saw Boelter dressed in dark colors and standing near the front door, facing the house.



Image from law enforcement footage depicting Boelter outside the Hortman home

- 25. Moments after their arrival on scene, Boelter fired several gunshots into the house as he moved forward, entering the Hortmans' home.
- 26. In dashcam footage from the scene, moments after Boelter fired those shots as he moved into the house, a second set of gunshots can be heard. At the same time, several flashes appear in the entryway windows.
- 27. About the same time, officers moved forward to the home's front doorway, where they saw Mr. Hortman, lying on the floor. Law enforcement approached the fallen Mr. Hortman, who had been struck by multiple gunshots, to try to provide medical assistance.
- 28. When officers entered the home, they found Representative Hortman suffering from multiple gunshot wounds. Officers also found inside the home the Hortman family dog, gravely injured. Representative and Mr. Hortman died from their injuries.
- 29. Boelter fled the Hortmans' home, leaving behind Boelter's 2015 Ford Explorer SUV that was parked outside the house. After obtaining a warrant, officers searched that vehicle. I know from my training and experience that Ford did not manufacture 2015 Explorers in the state of Minnesota.
- 30. Officers found evidence tying Boelter to the SUV, including a bill for a storage unit with Boelter's name. Officers also found the license plates for the SUV Boelter drove that night. Public records show the SUV is registered to Boelter and his wife.

31. Officers also found approximately five firearms in the SUV, including semi-automatic, assault-style rifles, as well as a large quantity of ammunition organized into loaded magazines. They also found a medical kit containing wound-treatment supplies and several eye masks of the kind that might be worn while sleeping.

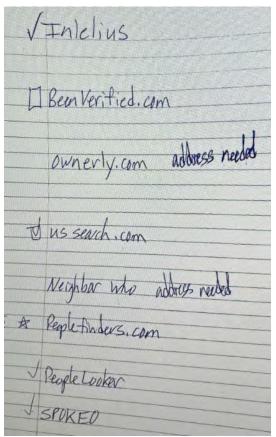


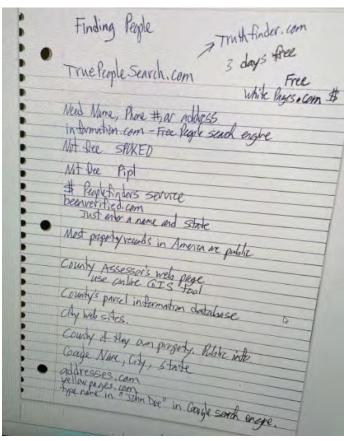


Interior of Boelter's abandoned SUV

32. From the SUV, officers recovered several notebooks full of hand-written notes. Listed among the pages of those notebooks were the names of more than 45 Minnesota state and federal public officials, including Representative Hortman, whose home address was written next to her name.

33. One of those notebooks contained lists of internet-based people search engines including Truepeoplesearch, Spokeo, Pipl, Peoplefinders, Beenverified, Whitepages, Truthfinder, Intelius, Ownerly, USsearch, and Peoplelooker. I know from my training and experience, and the training and experience of other officers and agents involved in this investigation, that these websites aggregate data from various online and offline sources to provide the querying user details about the searched-for person, such as home addresses, phone numbers, and information about family members.





 $Pages\ from\ Boelter's\ notebook$

- 34. In addition, officers found a Garmin GPS navigation device in the SUV. That device's "trip history" included the addresses of Representative Hortman's home in Brooklyn Park, Public Official 1's home in Maple Grove, and Senator Hoffman's home in Champlin. The trip history also included the home addresses for at least two other state officials.
- 35. Upon searching the surrounding area, law enforcement found components of a disassembled Beretta 92 9mm semiautomatic handgun and at least three magazines strewn across the ground a few blocks from Representative Hortman's home. Rounds contained in one or more of those magazines bore the same headstamp on the discharged cartridge casings found within or in the immediate vicinity of Representative Hortman's home. Records accessible to law enforcement indicate this Beretta was purchased by Boelter in or about January 2000.





Components of recovered Beretta 92 9mm handgun

36. In the same general area, law enforcement also found a flashlight, a tactical body armor vest, and a mask, all consistent with those Boelter can be seen wearing earlier in the morning.



Recovered facemask

37. According to records obtained by law enforcement, Boelter purchased three Beretta handguns, as well as many other firearms.

VI. Subsequent Investigation and Boelter's Apprehension

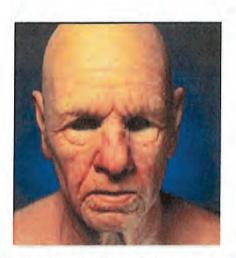
38. Law enforcement obtained information to track the locations of cell phones known to be used by Boelter and his wife. Law enforcement used the resulting data to locate Mrs. Boelter.

- 39. Mrs. Boelter consented to a law enforcement search of her phone. That search revealed that, around 6:18 am, Mrs. Boelter and other family members received a group text message from Boelter. In that text, Boelter wrote, among other things: "Dad went to war last night . . . I don't wanna say more because I don't wanna implicate anybody."
- 40. Around the same time, Mrs. Boelter received a text message from Boelter stating, among other things: "Words are not gonna explain how sorry I am for this situation. . . . there's gonna be some people coming to the house armed and trigger-happy and I don't want you guys around."
- 41. Mrs. Boelter consented to a search of her car. From the car, law enforcement recovered two handguns, approximately \$10,000 in cash, and passports for Mrs. Boelter and her children, who were in the car with Mrs. Boelter at the time.
- 42. Law enforcement obtained cell phone location information for multiple phones known to be associated with Boelter. That location data led law enforcement to a residence on Fremont Avenue in north Minneapolis. Law enforcement also found this same Fremont Avenue address in the Garmin's "trip history" described above. At the Fremont home, law enforcement encountered and interviewed a man who said he lives in the Fremont residence and, he explained, shares it with Boelter at least part time.
- 43. Officers conducted a warranted search of the Fremont Avenue residence.

 Officers found a handwritten list of names containing many of those same public officials named in the notebooks found in Boelter's SUV, as described above. Officers

also found a purchase receipt from Fleet Farm, dated about June 9, 2025, which documented the purchase of, among other things, a flashlight, a tactical rifle case, two types of firearm ammunition, and the materials believed to have been used to create the fake "POLICE" license plate attached to Boelter's SUV.

- 44. Law enforcement also found several notebooks containing handwritten notes. These notebooks were in addition to those recovered from the SUV. Among the pages of those various notebooks, officers found listed the names, and often home addresses, of numerous Minnesota public officials, including Representative Hortman—one of the people Boelter shot and murdered on June 14. Beneath her name, a notation reads, "married Mark 2 children 11th term." Mark was the name of Representative Hortman's husband. Another notation in one of the recovered notebooks names Hortman, her address, and her spouse again, with the added notation: "Big house off golf course 2 ways in to watch from one spot." That is an apt description of the Hortman home, which backs up to a golf course.
- 45. Another notebook notation lists three websites for companies that sell facemasks similar to the one Boelter wore. One of those websites describes itself as "your premier destination for high-end, hyper-realistic silicone masks." Another of those websites asserts that it "set[s] a new standard in hyper realistic silicone masks."





Mask advertised on one of the websites noted in notebook (left); Boelter wearing mask immediately prior to his shooting of Senator and Mrs. Hoffman (right)

- 46. In video footage from the area of the Fremont Avenue residence obtained by law enforcement, Boelter can be seen returning to that residence in the morning after his murder of the Hortmans and his shooting of the Hoffmans.
- 47. According to an interview later conducted by law enforcement with Witness 1, at approximately 7:00 a.m. on June 14, Boelter met Witness 1 at a bus stop at 48th Avenue North and North Lyndale Avenue in north Minneapolis. Witness 1 reported to law enforcement that he had no prior connection with Boelter prior to meeting at the bus stop. According to Witness 1, Boelter had two duffel bags with him. Boelter asked to purchase an electronic bike from Witness 1. After Witness 1 agreed, they together boarded a bus and traveled to Witness 1's residence. After arriving at Witness 1's residence, Boelter asked to purchase Witness 1's Buick sedan as well. Witness 1 agreed.
- 48. Around this time, Boelter and Witness 1 drove in the Buick to a U.S. Bank branch location in Robbinsdale, Minnesota, where Boelter withdrew \$2,200

from, and thereby emptied, an account in his name. Cameras at U.S. Bank captured Boelter wearing a cowboy hat.





Images from U.S. Bank security footage

- 49. Boelter reportedly provided about \$900 to Witness 1 to complete the purchase of the e-bike and Buick.
- 50. Around 2:30 a.m. on June 15, law enforcement received information about a possible sighting of an individual riding an e-bike approximately two miles northeast of Boelter's family home in Green Isle, Minnesota. However, law enforcement was unable to locate Boelter at that time.
- 51. Law enforcement investigated further and discovered the Buick that Boelter purchased from Witness 1 abandoned on Highway 25, close to the location of the reported e-bike sighting.



Map showing approximate locations described above

52. Law enforcement approached the vehicle using a drone to check for explosives or other potential safety concerns.



Law enforcement drone approaching abandoned Buick

53. A search of that vehicle uncovered, among other things, what appeared to be the cowboy hat Boelter wore when captured in the U.S. Bank security footage,

as well as a handwritten letter directed to the FBI. In that letter, the writer, who claimed his name was "Dr. Vance Luther Boelter," admitted to being "the shooter at large in Minnesota involved in the 2 shootings the morning of Saturday June 15th."

54. At approximately 9:10 p.m. on June 15, 2025, law enforcement located Boelter in a field in Green Isle, Minnesota, approximately one mile from his family residence. Officers took Boelter into custody.

CONCLUSION

55. Based on the foregoing, I submit there is probable cause to believe that, in or about June 2025, in the State and District of Minnesota, VANCE LUTHER BOELTER committed stalking in violation of 18 U.S.C. § 2261A(2)(A), use of a firearm to murder during and in relation to stalking, in violation of 18 U.S.C. § 924(j), and discharge of a firearm during and in relation to stalking, in violation of 18 U.S.C. § 924(c).

Special Agent Terry Getsch United States Department of Justice Federal Bureau of Investigation

SUBSCRIBED and SWORN before me by reliable electronic means (FaceTime and email) pursuant to Fed. R. Crim. P. 41(d)(3) on June 15, 2025

THE HONORABLE JOHN F. DOCHERTY UNITED STATES MAGISTRATE JUDGE