

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No.  
Court File No.

17A09303  
27-CR-18-4536

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**State of Minnesota,**

Plaintiff,

vs.

**JERRY LEE CURRY DOB: 02/25/1966**

4216 17TH AVE S  
MINNEAPOLIS, MN 55407

Defendant.

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**COMPLAINT**

Warrant

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: Stalking - Pattern of Stalking Conduct**

Minnesota Statute: 609.749.5(a), with reference to: 609.749.5(a)

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

Offense Level: Felony

Offense Date (on or about): 05/09/2012

Control #(ICR#): 17242608

Charge Description: That on or about 5/9/2012 through 05/09/2017, in Hennepin County, Minnesota, JERRY LEE CURRY engaged in a pattern of stalking conduct with respect to Victim A and/or members of the victim's household in a manner that would cause a reasonable person under the circumstances to feel terrorized or to fear bodily harm and that did cause this reaction on the part of the victim.

**COUNT II**

**Charge: Assault-1st Degree-Great Bodily Harm**

Minnesota Statute: 609.221.1, with reference to: 609.221.1, 609.101.2

Maximum Sentence: 20 YEARS AND/OR \$30,000

Offense Level: Felony

Offense Date (on or about): 02/21/2017

Control #(ICR#): 17242608

Charge Description: That on or about 2/21/2017 to 05/01/2017, in Hennepin County, Minnesota, JERRY LEE CURRY, assaulted Victim A and inflicted great bodily harm, blindness in left eye.

**COUNT III**

**Charge: Assault-1st Degree-Great Bodily Harm**

Minnesota Statute: 609.221.1, with reference to: 609.221.1, 609.101.2

Maximum Sentence: 20 YEARS AND/OR \$30,000

Offense Level: Felony

Offense Date (on or about): 02/21/2017

Control #(ICR#): 17242608

Charge Description: That on or about 2/21/2017 through 05/01/2017, in Hennepin County, Minnesota, JERRY LEE CURRY, assaulted Victim A and inflicted great bodily harm, disfigured ear.

#### COUNT IV

**Charge: Criminal Abuse-by Caregiver-Vulnerable Adult**

Minnesota Statute: 609.2325.1(a), with reference to: 609.2325.3(a)(2)

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

Offense Level: Felony

Offense Date (on or about): 02/20/2015

Control #(ICR#): 17242608

Charge Description: That on or about 2/20/2015 through 05/01/2017, in Hennepin County, Minnesota, JERRY LEE CURRY, a caregiver who, with intent to produce physical or mental pain or injury to a vulnerable adult, subjected a vulnerable adult, Victim A, to any aversive or deprivation procedure, unreasonable confinement, or involuntary seclusion, and the act resulted in great bodily harm.

#### COUNT V

**Charge: Criminal Sexual Cond-1st Degree-Penetration - Injury - Use Force/Coerce**

Minnesota Statute: 609.342.1(e)(i), with reference to: 609.342.2(a), 609.342.2(b), 609.101.2, 609.342.2(c)

Maximum Sentence: 30 YEARS AND/OR \$12,000-\$40,000, PLUS CONDITIONAL RELEASE

Offense Level: Felony

Offense Date (on or about): 01/01/2017

Control #(ICR#): 17242608

Charge Description: That on or about 1/1/2017, in Hennepin County, Minnesota, JERRY LEE CURRY engaged in sexual penetration with Victim B, and caused personal injury to her using force or coercion to accomplish sexual penetration.

#### COUNT VI

**Charge: Criminal Sexual Conduct-1st Degree-Penetration - Fear Great Bodily Harm**

Minnesota Statute: 609.342.1(c), with reference to: 609.342.2(a), 609.342.2(b), 609.101.2, 609.342.2(c)

Maximum Sentence: 30 YEARS AND/OR \$12,000-\$40,000, PLUS CONDITIONAL RELEASE

Offense Level: Felony

Offense Date (on or about): 01/01/2017

Control #(ICR#): 17242608

Charge Description: That on or about 1/1/2017, in Hennepin County, Minnesota, JERRY LEE CURRY engaged in sexual penetration with Victim B, and circumstances existing at the time of the act caused the victim to have a reasonable fear of imminent great bodily harm to herself or another.

#### COUNT VII

**Charge: Criminal Abuse-by Caregiver-Vulnerable Adult**

Minnesota Statute: 609.2325.1(a), with reference to: 609.2325.3(a)(2)

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

Offense Level: Felony

Offense Date (on or about): 02/20/2015

Control #(ICR#): 17242608

Charge Description: That on or about 2/20/2015 through 05/09/2017, in Hennepin County, Minnesota, JERRY LEE CURRY, a caregiver who, with intent to produce physical or mental pain or injury to a vulnerable adult, subjected a vulnerable adult, Victim B, to any aversive or deprivation procedure, unreasonable confinement, or involuntary seclusion, and the act resulted in great bodily harm.

**COUNT VIII**

**Charge: Assault-2nd Degree-Dangerous Weapon**

Minnesota Statute: 609.222.1, with reference to: 609.222.1, 609.11.4, 609.101.2

Maximum Sentence: 7 YEARS AND/OR \$4,200-\$14,000

Offense Level: Felony

Offense Date (on or about): 02/01/2014

Control #(ICR#): 17242608

Charge Description: That on or about 2/1/2014 through 2/1/2016, in Hennepin County, Minnesota, JERRY LEE CURRY, assaulted Victim C, while using a dangerous weapon.

Minimum Sentence: 1 YEAR AND 1 DAY

**COUNT IX**

**Charge: Endanger Child-Situation Could Cause Harm or Death-G**

Minnesota Statute: 609.378.1(b)(1), with reference to: 609.378.1(b)(1)

Maximum Sentence: 1 YEAR AND/OR \$3,000

Offense Level: Gross Misdemeanor

Offense Date (on or about): 02/20/2015

Control #(ICR#): 17242608

Charge Description: That on or about 2/20/2015 through 5/9/2017, in Hennepin County, Minnesota, JERRY LEE CURRY, a parent, endangered a child's person or health by intentionally or recklessly causing or permitting a child, Victim C, to be placed in a situation likely to substantially harm the child's physical, emotional, mental health or cause the child's death.

## STATEMENT OF PROBABLE CAUSE

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

On April 25, 2017, Minneapolis Police were dispatched to a residence on 15th Ave. S. in the City of Minneapolis, County of Hennepin, and State of Minnesota in response to a domestic abuse complaint. Upon arrival, officers spoke with SHEILA MACHELLE WILSON, DOB 02/11/1970, and JERRY LEE CURRY, DOB 2/25/66, the defendant herein. WILSON and CURRY lived at the residence with their 20-year-old twin daughters, Victim A and Victim B (DOB 9/96, fully identified in the police reports), and their 10-year-old daughter, Victim C (DOB 2/2007, fully identified in the police reports).

Victim A and Victim B are vulnerable adults. In August 2014, WILSON petitioned for and was appointed a limited guardianship of Victim A and Victim B. The district court determined that Victim A and Victim B were incapacitated persons whose needs could not be met by less restrictive means. The appointment granted WILSON the power to (1) determine where Victim A and Victim B lived; (2) consent to or withhold consent for medical care, counseling, or treatment; (3) exercise supervision authority over Victim A and Victim B; and (4) apply for financial benefits or other government assistance. SHEILA WILSON renewed the limited guardianship in September 2016.

Victim A's cognitive and emotional functioning was subsequently assessed in June 2017 by a clinical psychologist. The doctor concluded that Victim A had a Neurodevelopment/Cognitive Disorder with intellectual skills ranging from the deficient to the Borderline range (a grade equivalent of first to third grade) and an adaptive behavior composite of approximately 6.8 years. The psychologist determined that Victim A met the criteria for the Developmental Disabilities waiver and required adult supervision.

Victim B's cognitive and emotional functioning was also assessed in February 2017 by a clinical psychologist. The psychologist concluded that Victim B's intellectual functioning is in the mild to moderate intellectual disability range. Victim B's adaptive behavior composite score placed her in the mild to moderate developmental disability range. The psychologist opined that Victim B is not capable of fully independent or semi-independent living.

On May 1, 2017, WILSON reported Victim A missing, and Minneapolis Police initiated an investigation into Victim A's whereabouts. On May 2, 2017, the Minnesota Adult Abuse Reporting Center (MAARC) received a report from the Salvation Army Harbor Lights Center that Victim A was at their facility and a physical examination revealed significant injuries consistent with abuse. Minneapolis Police responded to Harbor Lights and spoke with Victim A, who indicated that she was afraid of returning home, but did not wish to discuss it further. On May 9, 2017, Hennepin County Human Services removed Victim B and Victim C from WILSON and CURRY's Minneapolis residence. Victim A subsequently left the Harbor Lights Shelter and was not found until June 7, 2017 when she arrived at the Women of Nations Shelter in St. Paul.

### VICTIM A

Victim A underwent a forensic interview at CornerHouse on June 12, 2017 where she disclosed physical abuse by CURRY. According to Victim A, CURRY repeatedly struck her and Victim B with bats and paddles on their arms, legs, and heads. When Victim A was 15 years old, CURRY and WILSON became aware that Victim A was sexually active. In response, CURRY restrained Victim A by putting a dog chain around one or both of her ankles and connecting the other end to CURRY and WILSON's bedroom door. CURRY repeatedly restrained Victim A with the chain to prevent her from seeing men or to prevent her from acquiring food. Victim A described being chained to the bedroom door for multiple days at a time, often

with her hands tied behind her back. CURRY struck Victim A while she was chained until her wounds would bleed. At that point, WILSON would remove the chains. Victim A noted that she had received medical care for her wounds, but did not disclose the nature of her injury. Victim A further disclosed that CURRY repeatedly chained Victim B to a door and once struck Victim C with a golf club on Victim C's head.

On June 15, 2017, Victim A was examined at the Center for Safe and Healthy Children. The examination revealed multiple injuries to Victim A. The top of Victim A's left ear was largely detached. Victim A had scars on her forehead including (1) two four-centimeter horizontal scars above each eyebrow, (2) a mid-scalp Y-shaped scar approximately seven centimeters in length on her scalp line, and (3) a seven-centimeter scar on her scalp line extending backward on her scalp. Victim A had significant linear and patterned scarring on her back. Victim A told her medical providers that her scars and detached ear occurred when CURRY struck her with a bat and paddle.

The examination also revealed injuries to Victim A consistent with having been chained. Victim A had healed circumferential scars on both wrists. Victim A's right ankle has a deep, healed divot with three linear scars extending around the ankle. Victim A's left ankle was swollen, with a circumferential scar extending around the entire ankle. Victim A described being chained until the wounds were bleeding and infected. Her medical providers noted that these injuries will continue to affect her gait and mobility.

Victim A also reported that she could not see out of her left eye after CURRY stomped on her head. The examination revealed that Victim A's left pupil was completely gray and slightly protruded. Victim A was subsequently examined by ophthalmologists at Hennepin County Medical Center (HCMC) who diagnosed a complete funnel retinal detachment consistent with trauma with a very low possibility of rehabilitation.

The Center for Safe and Healthy Children concluded that Victim A's injuries were clinically diagnostic of torture, or a severe type of vulnerable adult abuse that places a vulnerable adult at risk for significant physical and psychological morbidity and mortality. A review of Victim A's medical records reveals that Victim A was admitted at HCMC from February 8, 2017 to February 21, 2017 for the excision of a wound and a skin graft on her right ankle. There is no reference within those records to a detached ear or loss of vision in her left eye. Both injuries are first observed by medical providers at the Harbor Lights Center in May 2017.

## VICTIM B

On May 9, 2017, Hennepin County Human Services transported Victim B to HCMC where she was admitted. Victim B was pregnant. Victim B underwent a CornerHouse interview on May 25, 2017. At that time, Victim B denied physical abuse by CURRY and WILSON and stated that visible scars on her person were dog scratches or mosquito bites. Victim B stated that the father of her unborn child was an unknown male.

On June 14, 2017, a nurse at HCMC entered Victim B's room and found Victim B crying. At that time, Victim B disclosed that she was raped by CURRY and that CURRY was the father of her unborn child. Victim B stated that CURRY routinely raped her at their Minneapolis residence when WILSON was not home. Victim B disclosed that both CURRY and WILSON would chain Victim B and Victim A to the door of their parents' bedroom for days at a time. CURRY would also beat Victim B and Victim A if they misbehaved. Victim B described being struck with fists, bats, and brooms. Victim B recalled observing CURRY stomp on Victim A's head and Victim A losing part of her ear as a result. Victim B stated that CURRY would strike Victim C, but Victim C was considered too young to be chained to the door.

Victim B was examined by providers with the Center for Safe and Healthy Children on September 5, 2017 where it was determined that the history of physical abuse, sexual abuse, and medical neglect described

was clinically diagnostic of torture. Victim B had numerous linear and patterned scars over her entire body including her face, arms, wrists, and back as well as one chipped tooth. Victim B also had circumferential scarring on both ankles.

Investigators submitted a known DNA sample from CURRY and Victim B to the BCA for DNA analysis. The DNA profiling results indicate that CURRY could not be excluded from being the biological father or Victim B. It is estimated that 99.9999% of the general population can be excluded. Victim B gave birth to a baby girl in October 2017. Investigators submitted a known DNA sample from the infant to the BCA for DNA analysis. The DNA profiling results indicate that CURRY cannot be excluded from being the biological father of Victim B's infant daughter. It is estimated that 99.9999% of the general population can be excluded.

#### VICTIM C

On May 9, 2017, Hennepin County Human Services transported Victim C to HCMC. Victim C's physical examination did not reveal any injury or signs of physical abuse. HCMC discharged Victim C on 5/12/2017 to St. Joseph's Emergency Shelter for Children. Victim C underwent a forensic interview with CornerHouse on May 22, 2017 in which Victim C denied experiencing or observing any physical abuse in her home. On June 23, 2017, Victim C disclosed that CURRY had struck her with a golf club in the head when she was in second or third grade. Victim C stated that she observed CURRY strike Victim A with a bat and disclosed that CURRY made Victim C strike her sisters with a stick. Victim C stated that Victim A and Victim B were not allowed to leave the house. If Victim A or Victim B misbehaved, CURRY would chain them to a door.

The defendant is not in custody. Due to the serious nature of the offense and the threat posed to public safety, the State respectfully requests that a warrant issue with this complaint.

## 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**

Phillip Gangnon  
Sgt.  
350 S 5th St  
Minneapolis, MN 55415-1389  
Badge: 2195

Electronically Signed:  
02/20/2018 12:39 PM  
Hennepin County, Minnesota

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

**Prosecuting Attorney**

Sarah Hilleren  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
02/20/2018 11:48 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 300 S Sixth Street, Minneapolis, MN 55487 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: \$750,000.00

Conditions of Release: No Contact with Victim

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: February 20, 2018.

**Judicial Officer**

Nancy Brasel  
District Court Judge

Electronically Signed: 02/20/2018 01:43 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.

**JERRY LEE CURRY**

Defendant

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

Signature of Authorized Service Agent:



## DEFENDANT FACT SHEET

**Name:** JERRY LEE CURRY  
**DOB:** 02/25/1966  
**Address:** 4216 17TH AVE S  
MINNEAPOLIS, MN 55407

**Alias Names/DOB:**

**SID:**

**Height:**

**Weight:**

**Eye Color:**

**Hair Color:**

**Gender:** MALE

**Race:** Black

**Fingerprints Required per Statute:** Yes

**Fingerprint match to Criminal History Record:** No

**Driver's License #:**

**SILS Person ID #:** 183716

**SILS Tracking No.** 2957000

**Case Scheduling Information:** RUSH WARRANT REQUESTED: The defendant is not in custody. Due to the serious nature of the offense and the threat posed to public safety, the State respectfully requests that a warrant issue with this complaint.

**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	5/9/2012	609.749.5(a) Stalking - Pattern of Stalking Conduct	Felony	N131E		MN0271100	17242608
	Penalty	5/9/2012	609.749.5(a) Stalking - Pattern of Stalking Conduct	Felony	N131E		MN0271100	17242608
2	Charge	2/21/2017	609.221.1 Assault-1st Degree-Great Bodily Harm	Felony	A1151		MN0271100	17242608
	Definition	2/21/2017	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A1151		MN0271100	17242608
	Penalty	2/21/2017	609.221.1 Assault-1st Degree-Great Bodily Harm	Felony	A1151		MN0271100	17242608
3	Charge	2/21/2017	609.221.1 Assault-1st Degree-Great Bodily Harm	Felony	A1141		MN0271100	17242608
	Definition	2/21/2017	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A1141		MN0271100	17242608
	Penalty	2/21/2017	609.221.1 Assault-1st Degree-Great Bodily Harm	Felony	A1141		MN0271100	17242608
4	Charge	2/20/2015	609.2325.1(a) Criminal Abuse-by Caregiver-Vulnerable Adult	Felony	I1141		MN0271100	17242608
	Penalty	2/20/2015	609.2325.3(a)(2) Criminal Abuse-Caregiver-Great Bodily Harm-Vulnerable Adult	Felony	I1141		MN0271100	17242608
5	Charge	1/1/2017	609.342.1(e)(i) Criminal Sexual Cond-1st Degree-Penetration - Injury - Use Force/Coerce	Felony	L1327		MN0271100	17242608
	Definition	1/1/2017	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	L1327		MN0271100	17242608
	Definition	1/1/2017	609.342.2(c) Criminal Sexual Conduct-1st Degree-Subject to conditional release under section 609.3455	No-Level	L1327		MN0271100	17242608
	Penalty	1/1/2017	609.342.2(a) Criminal Sexual Conduct-1st Degree-Penalty-Stat Max	Felony	L1327		MN0271100	17242608
	Penalty	1/1/2017	609.342.2(b) Criminal Sexual Conduct-1st Degree-Penalty-Presumptive 144 mo.	Felony	L1327		MN0271100	17242608
6	Charge	1/1/2017	609.342.1(c) Criminal Sexual Conduct-1st Degree-Penetration - Fear Great Bodily Harm	Felony	L1227		MN0271100	17242608
	Definition	1/1/2017	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	L1227		MN0271100	17242608
	Definition	1/1/2017	609.342.2(c) Criminal Sexual Conduct-1st Degree-Subject to conditional release under section 609.3455	No-Level	L1227		MN0271100	17242608
	Penalty	1/1/2017	609.342.2(a) Criminal Sexual Conduct-1st Degree-Penalty-Stat Max	Felony	L1227		MN0271100	17242608
	Penalty	1/1/2017	609.342.2(b) Criminal Sexual Conduct-1st Degree-Penalty-Presumptive 144 mo.	Felony	L1227		MN0271100	17242608
7	Charge	2/20/2015	609.2325.1(a)	Felony	I1141		MN0271100	17242608

Criminal Abuse-by  
Caregiver-Vulnerable Adult

	Penalty	2/20/2015	609.2325.3(a)(2) Criminal Abuse-Caregiver-Great Bodily Harm-Vulnerable Adult	Felony	I1141	MN0271100	17242608
8	Charge	2/1/2014	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2344	MN0271100	17242608
	Definition	2/1/2014	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A2344	MN0271100	17242608
	Penalty	2/1/2014	609.11.4 Minimum Sentences of Imprisonment-Use Dangerous Weapon	Felony	A2344	MN0271100	17242608
	Penalty	2/1/2014	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2344	MN0271100	17242608
9	Charge	2/20/2015	609.378.1(b)(1) Endanger Child-Situation Could Cause Harm or Death-G	Gross Misdemeanor	I2104	MN0271100	17242608
	Penalty	2/20/2015	609.378.1(b)(1) Endanger Child-Situation Could Cause Harm or Death-G	Gross Misdemeanor	I2104	MN0271100	17242608