

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No.
Court File No.

18A02178
27-CR-18-5059

State of Minnesota,

Plaintiff,

vs.

DEONTE DARNELL LAWSON DOB: 09/04/1994

2755 ALDRICH AVE S
MINNEAPOLIS, MN 55408

Defendant.

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: 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), 609.05.1, 609.05.2, 609.101.2, 609.342.2(c), 609.3455.10

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

Offense Level: Felony

Offense Date (on or about): 10/16/2017

Control #(ICR#): 17398878

Charge Description: That on or about 10/16/2017, in Hennepin County, Minnesota, DEONTE DARNELL LAWSON, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with others or otherwise procures the others to commit the crime, engaged in sexual penetration with VICTIM and circumstances existing at the time of the act caused the victim to have a reasonable fear of imminent great bodily harm to herself.

COUNT II

Charge: Criminal Sex Conduct-1st Degree-Penetration - Accomplice Uses/Force/Coerce

Minnesota Statute: 609.342.1(f)(i), with reference to: 609.342.2(a), 609.342.2(b), 609.05.1, 609.05.2, 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): 10/16/2017

Control #(ICR#): 17398878

Charge Description: That on or about 10/16/2017, in Hennepin County, Minnesota, DEONTE DARNELL LAWSON engaged in sexual penetration with VICTIM, and was aided or abetted by one or more accomplices, and an accomplice used force or coercion to cause the victim to submit.

COUNT III

Charge: Criminal Sex Conduct-2nd Degree-Fear Great Bodily Harm

Minnesota Statute: 609.343.1(c), with reference to: 609.05.1, 609.05.2, 609.101.2, 609.343.2(b), 609.343.2(a), 609.3455.10

Maximum Sentence: 25 YEARS AND/OR \$10,500-\$35,000

Offense Level: Felony

Offense Date (on or about): 10/16/2017

Control #(ICR#): 17398878

Charge Description: That on or about 10/16/2017, in Hennepin County, Minnesota, DEONTE DARNELL LAWSON, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with others or otherwise procures the others to commit the crime, engaged in sexual contact with VICTIM, and circumstances existing at the time of the act caused the victim to have a reasonable fear of imminent great bodily harm to herself.

COUNT IV

Charge: Criminal Sex Conduct-2nd Degree-Accomplice(s)-Force/Coerce

Minnesota Statute: 609.343.1(f)(i), with reference to: 609.05.1, 609.05.2, 609.101.2, 609.343.2(b), 609.343.2(a)

Maximum Sentence: 25 YEARS AND/OR \$10,500-\$35,000

Offense Level: Felony

Offense Date (on or about): 10/16/2017

Control #(ICR#): 17398878

Charge Description: That on or about 10/16/2017, in Hennepin County, Minnesota, DEONTE DARNELL LAWSON engaged in sexual contact with VICTIM, and was aided or abetted by one or more accomplices within the meaning of Minn. Stat. 609.05, and an accomplice used force or coercion to cause the victim to submit.

COUNT V

Charge: Criminal Sex Conduct-3rd Degree-Force or Coercion

Minnesota Statute: 609.344.1(c), with reference to: 609.05.1, 609.05.2, 609.101.2, 609.3455.7, 609.3455.10, 609.3455.6, 609.344.2(1)

Maximum Sentence: 15 YEARS AND/OR \$10,000-\$30,000 PLUS CONDITIONAL RELEASE

Offense Level: Felony

Offense Date (on or about): 10/16/2017

Control #(ICR#): 17398878

Charge Description: That on or about 10/16/2017, in Hennepin County, Minnesota, DEONTE DARNELL LAWSON, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with others or otherwise procures the others to commit the crime, engaged in sexual penetration with VICTIM, using force or coercion to accomplish the penetration.

COUNT VI

Charge: Kidnapping-To Facilitate Felony or Flight

Minnesota Statute: 609.25.1(2), with reference to: 609.25.2(2), 609.05.1, 609.05.2

Maximum Sentence: 40 YEARS AND/OR \$50,000

Offense Level: Felony

Offense Date (on or about): 10/16/2017

Control #(ICR#): 17398878

Charge Description: That on or about 10/16/2017, in Minneapolis, Hennepin County, Minnesota, DEONTE DARNELL LAWSON, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with others or otherwise procures the others to commit the crime, removed VICTIM from one place to another without her consent in order to facilitate commission of a felony or flight thereafter, and VICTIM was not released in a safe place.

COUNT VII

Charge: Theft-Take/Drive Motor Vehicle-No Owner Consent

Minnesota Statute: 609.52.2(a)(17), with reference to: 609.05.1, 609.05.2

Maximum Sentence: 3 years

Offense Level: Felony

Offense Date (on or about): 10/16/2017

Control #(ICR#): 17398878

Charge Description: That on or about 10/16/2017, in Minneapolis, Hennepin County, Minnesota, DEONTE DARNELL LAWSON, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with others or otherwise procures the others to commit the crime, took and/or drove a motor vehicle, Minnesota license plate 078PRT, without the consent of VICTIM, and he knew or had reason to know that the owner did not give consent.

STATEMENT OF PROBABLE CAUSE

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

On or about October 16, 2017, police detectives from Minneapolis Police Department were alerted to a sexual assault case that had occurred in Hennepin and Washington counties. The adult female victim in this matter, VICTIM, contacted 911 on October 16, 2017, at approximately 4:26 a.m., after escaping from her assailants in the town of Scandia, Washington County, Minnesota. VICTIM was transported to a nearby hospital in Stillwater, Minnesota. VICTIM told responding Washington County officers that in the late evening hours of October 15, 2017, or the early morning hours of October 16, 2017, she had been abducted by three unknown black males from the rear of her apartment building, located in Minneapolis, Hennepin County, Minnesota, while she was getting something out of the trunk of her vehicle, Minnesota license plate 087PRT. VICTIM stated that the males forced her into the backseat of her vehicle at gunpoint and took her credit cards. VICTIM stated that they drove around with her in the vehicle and used her credit card to buy food from White Castle.

At one point during her abduction, her assailants took her to a secluded, wooded area where she was forced to perform sexual acts on the assailants, including oral and vaginal penetration. VICTIM noted that one of the three males appeared to be the "leader." He told VICTIM, "Bitch, get on your knees," and VICTIM then gave oral sex to all three males. VICTIM stated that she was then held down by two of the males while the males vaginally raped her. VICTIM thought she was going to die and stated she was over-powered by the assailants during the entire sexual assault. VICTIM was unsure what city she was in during the sexual assaults but believed it to be in Minneapolis. After the sexual assaults, VICTIM was dragged by the assailants back into her vehicle and they drove to a rural area. VICTIM stated she was worried they were going to kill her and was fearful for her life as they were driving in a remote area, and she convinced the driver of the vehicle that they needed to stop for gas. The driver of the vehicle stopped at a gas station located at 19261 Manning Trail North, in Scandia, Minnesota. At this point, VICTIM was able to escape from the vehicle and run from her assailants into a nearby wooded area. VICTIM was barefoot and hid behind a tree until the assailants finally left in her vehicle, after one male attempted to look for her. The gas station was closed but VICTIM was able to contact persons, K.O. and D.L., living above the gas station, and they gave her their phone to call 911. During the interview, officers observed VICTIM was crying. Officers also observed that VICTIM's clothing was dirty, her bare feet were covered in mud, and that she had small cuts and scratches on her face and hands.

Officers spoke with K.O. and D.L. who reported that they were awoken by pounding on their front door. They could hear a female on the other side of the door crying and asking for help. When they opened the door, K.O. and D.L. stated that VICTIM told them she was sexually assaulted, observed she was crying and upset, and also noted she did not have any personal property, like a purse or phone, on her. K.O. and D.L. let VICTIM use their phone to contact the police.

A sexual assault examination (SAE) was conducted on VICTIM while she was at the hospital. The evidence from the examination was sent to the Bureau of Criminal Apprehension (BCA) forensic laboratory, which reported that semen was detected from VICTIM's cervical, perineal, pubic hair and rectal swabs. DNA was analyzed from the samples taken from VICTIM.

VICTIM was unable to clearly remember her assailants in detail but gave a brief description of the males. She stated the "leader" was the person driving her car and described him as a black male with longer dreadlocks. VICTIM stated that the black male who was in the backseat with her had a red hooded sweatshirt on. VICTIM also stated that the black male in the front passenger seat may have also had a

hooded sweatshirt on. VICTIM reviewed the purchases made on her credit cards over the relevant time period and noted unauthorized purchases to the following places: White Castle, Foot Locker, Walmart, Holiday gas station, and Super America. These unauthorized purchases occurred in Hennepin County, except for purchases from White Castle.

Officers were able to review surveillance footage from the above-noted Super America and got a still photograph of all three assailants. In the photograph, there are three black males: one has longer hair that is pulled back, one is wearing a green jacket, and one is wearing a red hooded sweatshirt. Officers also reviewed surveillance footage from the above-noted Walmart in Brooklyn Center and captured a still photograph depicting two black males leaving the building after using VICTIM's credit card. The video showed those two males getting into VICTIM's vehicle after leaving the store. Officers requested assistance from other law enforcement agencies in identifying the individual with the longer hair in the Walmart surveillance footage. At this point, investigators had already identified the person in the green jacket to be Respondent D.D.F. A Hennepin County Sheriff's Office deputy contacted the investigating officers to inform them he recognized the shoes on one of the males in the still photo and video from Walmart, as he had booked someone into jail approximately one week after the footage was taken who was wearing the same shoes. That male was identified as Defendant DEONTE DARNELL LAWSON (DOB 9/4/1994). After comparing a booking photo of Defendant to the still photos from Super America and Walmart, officers confirmed that the person in those photos was the above-named Defendant. Additionally, officers recovered the clothing worn by Defendant LAWSON when he was booked into the jail and noted that the clothing obtained appeared to be very similar to the clothing worn by him in the Walmart surveillance photos and video; specifically, his boots and a black jacket with contrasting piping around the wrist cuffs. Officers identified the third involved in the offenses through investigation, including DNA analysis, as Respondent W.A.

The BCA results from VICTIM's SAE exam were provided to officers on January 11, 2018, and noted that a mixture of three or more individuals had been developed from the samples. A DNA profile obtained from the perineal swab of VICTIM's SAE kit was a match to DNA found in the Minnesota Convicted Offender Database, which belonged to Defendant LAWSON. Officers received a confirmatory DNA sample from Defendant LAWSON pursuant to a search warrant. Analysis on the confirmatory DNA sample confirmed that Defendant LAWSON cannot be excluded as a contributor to the mixture of semen found on the following swabs taken from VICTIM during the SAE: perineal swab and cervical swab; 99.9% of the population CAN be excluded as a contributor to those samples.

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

Matt C Wente
Sgt.
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 7640

Electronically Signed:
02/23/2018 05:13 PM
Hennepin County, Minnesota

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

Prosecuting Attorney

Maximillia Utley
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
02/23/2018 12:45 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 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; No Contact with Co-Defendant(s); No Possession of Weapons; Remain Law Abiding

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 26, 2018.

Judicial Officer Susan M. Robiner Electronically Signed: 02/26/2018 04:16 PM
District Court Judge

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

**COUNTY OF HENNEPIN
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

DEONTE DARNELL LAWSON

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: DEONTE DARNELL LAWSON
DOB: 09/04/1994
Address: 2755 ALDRICH AVE S
MINNEAPOLIS, MN 55408

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 #: 749217
SILS Tracking No. 2996894
Case Scheduling Information: State is requesting a warrant due to the seriousness of the offenses.
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	10/16/2017	609.342.1(c) Criminal Sexual Conduct-1st Degree-Penetration - Fear Great Bodily Harm	Felony	L1287	X	MN0271100	17398878
	Definition	10/16/2017	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	L1287	X	MN0271100	17398878
	Definition	10/16/2017	609.342.2(c) Criminal Sexual Conduct-1st Degree-Subject to conditional release under section 609.3455	No-Level	L1287	X	MN0271100	17398878
	Definition	10/16/2017	609.3455.10 Dangerous Sex Offenders - Presumptive Executed Sentence for Repeat Sex Offenders	No-Level	L1287	X	MN0271100	17398878
	Modifier	10/16/2017	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	L1287	X	MN0271100	17398878
	Penalty	10/16/2017	609.342.2(a) Criminal Sexual Conduct-1st Degree-Penalty-Stat Max	Felony	L1287	X	MN0271100	17398878
	Penalty	10/16/2017	609.342.2(b) Criminal Sexual Conduct-1st Degree-Penalty-Presumptive 144 mo.	Felony	L1287	X	MN0271100	17398878
	Modifier	10/16/2017	609.05.1 Liability for Crimes of Another-Intentional	No-Level	L1287	X	MN0271100	17398878
2	Charge	10/16/2017	609.342.1(f)(i) Criminal Sex Conduct-1st Degree-Penetration - Accomplice Uses/Force/Coerce	Felony	L1687	X	MN0271100	17398878
	Modifier	10/16/2017	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	L1687	X	MN0271100	17398878
	Definition	10/16/2017	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	L1687	X	MN0271100	17398878
	Definition	10/16/2017	609.342.2(c) Criminal Sexual Conduct-1st Degree-Subject to conditional release under section 609.3455	No-Level	L1687	X	MN0271100	17398878
	Penalty	10/16/2017	609.342.2(a) Criminal Sexual Conduct-1st Degree-Penalty-Stat Max	Felony	L1687	X	MN0271100	17398878
	Penalty	10/16/2017	609.342.2(b) Criminal Sexual Conduct-1st Degree-Penalty-Presumptive 144 mo.	Felony	L1687	X	MN0271100	17398878
	Modifier	10/16/2017	609.05.1 Liability for Crimes of Another-Intentional	No-Level	L1687	X	MN0271100	17398878
3	Charge	10/16/2017	609.343.1(c) Criminal Sex Conduct-2nd Degree-Fear Great Bodily Harm	Felony	L3287	X	MN0271100	17398878
	Penalty	10/16/2017	609.343.2(b) Criminal Sexual Conduct-2nd Degree-Penalty-90 Mos. Presumptive Sentence	Felony	L3287	X	MN0271100	17398878
	Penalty	10/16/2017	609.343.2(a) Criminal Sexual Conduct-2nd Degree-Penalty-Stat. Max.	Felony	L3287	X	MN0271100	17398878
	Definition	10/16/2017	609.3455.10 Dangerous Sex Offenders -	No-Level	L3287	X	MN0271100	17398878

Presumptive Executed Sentence for Repeat Sex Offenders

Modifier	10/16/2017	609.05.1 Liability for Crimes of Another-Intentional	No-Level	L3287	X	MN0271100	17398878	
Modifier	10/16/2017	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	L3287	X	MN0271100	17398878	
Definition	10/16/2017	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	L3287	X	MN0271100	17398878	
4	Charge	10/16/2017	609.343.1(f)(i) Criminal Sex Conduct-2nd Degree-Accomplice(s)-Force/Coerce	Felony	L3687	X	MN0271100	17398878
	Penalty	10/16/2017	609.343.2(b) Criminal Sexual Conduct-2nd Degree-Penalty-90 Mos. Presumptive Sentence	Felony	L3687	X	MN0271100	17398878
	Penalty	10/16/2017	609.343.2(a) Criminal Sexual Conduct-2nd Degree-Penalty-Stat. Max.	Felony	L3687	X	MN0271100	17398878
	Definition	10/16/2017	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	L3687	X	MN0271100	17398878
	Modifier	10/16/2017	609.05.1 Liability for Crimes of Another-Intentional	No-Level	L3687	X	MN0271100	17398878
	Modifier	10/16/2017	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	L3687	X	MN0271100	17398878
5	Charge	10/16/2017	609.344.1(c) Criminal Sex Conduct-3rd Degree-Force or Coercion	Felony	L5387	X	MN0271100	17398878
	Definition	10/16/2017	609.3455.10 Dangerous Sex Offenders - Presumptive Executed Sentence for Repeat Sex Offenders	No-Level	L5387	X	MN0271100	17398878
	Definition	10/16/2017	609.3455.6 Dangerous Sex Offenders - Ten Year Conditional Release	No-Level	L5387	X	MN0271100	17398878
	Penalty	10/16/2017	609.344.2(1) Criminal Sexual Conduct-3rd Degree-Penalty	Felony	L5387	X	MN0271100	17398878
	Definition	10/16/2017	609.3455.7 Dangerous Sex Offenders - Lifetime Conditional Release	No-Level	L5387	X	MN0271100	17398878
	Modifier	10/16/2017	609.05.1 Liability for Crimes of Another-Intentional	No-Level	L5387	X	MN0271100	17398878
	Modifier	10/16/2017	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	L5387	X	MN0271100	17398878
	Definition	10/16/2017	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	L5387	X	MN0271100	17398878
6	Charge	10/16/2017	609.25.1(2) Kidnapping-To Facilitate Felony or Flight	Felony	K1213	X	MN0271100	17398878
	Modifier	10/16/2017	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	K1213	X	MN0271100	17398878
	Modifier	10/16/2017	609.05.1 Liability for Crimes of Another-Intentional	No-Level	K1213	X	MN0271100	17398878
	Penalty	10/16/2017	609.25.2(2)	Felony	K1213	X	MN0271100	17398878

Kidnap-Not Release Safe Place-Great
Bodily Harm or U/16 - Sentence

7	Charge	10/16/2017	609.52.2(a)(17) Theft-Take/Drive Motor Vehicle-No Owner Consent	Felony	V0021	X	MN0271100	17398878
	Modifier	10/16/2017	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	V0021	X	MN0271100	17398878
	Modifier	10/16/2017	609.05.1 Liability for Crimes of Another-Intentional	No-Level	V0021	X	MN0271100	17398878