

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 19A13308  
Court File No. 27-CR-19-26682

---

**State of Minnesota,**

Plaintiff,

vs.

**SERENITY JOY JONES DOB: 09/03/1991**

1112 RHODE ISLAND AVE N  
GOLDEN VALLEY, MN 55427

Defendant.

---

**COMPLAINT**

Order of Detention

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: Burglary-1st Deg-Dwelling-Occupied-Non-Accomplice Present**

Minnesota Statute: 609.582.1(a), with reference to: 609.582.1, 609.582.1a, 609.05.1, 609.05.2

Maximum Sentence: 20 YEARS AND/OR \$35,000

Offense Level: Felony

Offense Date (on or about): 10/23/2019

Control #(ICR#): 19319673

Charge Description: That on or about 10/23/2019, in Hennepin County, Minnesota, SERENITY JOY JONES, either directly or as an accomplice, entered a dwelling, without consent and with intent to commit a crime or committed a crime while in the dwelling and another person, Victim, who was not an accomplice, was in the dwelling at any time while SERENITY JOY JONES was in the dwelling.

Minimum Sentence: 6 MONTHS

**COUNT II**

**Charge: Deprive-Custody/Parent Rights-Violation Court Order -Take Minor**

Minnesota Statute: 609.26.1(3), with reference to: 609.26.6(a)(1)

Maximum Sentence: 2 YEARS AND/OR \$4,000

Offense Level: Felony

Offense Date (on or about): 10/23/2019

Control #(ICR#): 19319673

Charge Description: That on or about 10/23/2019, in Hennepin County, Minnesota, SERENITY JOY JONES took, obtained, retained or failed to return a minor child from or to the child's parent, in violation of a court order, and intended to deprive the parent of parental rights.

## STATEMENT OF PROBABLE CAUSE

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

On the evening of October 23, 2019, Minneapolis police responded to a 911 call from a residence in Minneapolis, Hennepin County, Minnesota. The caller reported that he had been at home with his five-year-old daughter, hereafter "Victim," when Victim's mother came to the door with an unknown man and pounded on the door. The mother was identified as SERENITY JOY JONES, and the man with her was later identified as DENNIS MICHAEL BRANN.

Victim's father stated that Defendants JONES and BRANN eventually forced the front door of the home open and came inside. JONES picked up Victim and left with her while BRANN stood inside the front door.

On March 29, 2019, a Hennepin County district court judge awarded sole legal and physical custody of Victim to her father. In approximately September, Defendant JONES began having parenting time with Victim on weekends, including the weekend of October 19 and 20. On October 20, Defendant JONES refused to return Victim to her father's care and did not take Victim to school the next day. Victim's father sought and received an ex parte order from the Court requiring Victim to be returned to him and directing law enforcement to assist, if necessary. Coon Rapids police assisted Victim's father in retrieving Victim from Defendant JONES on October 21.

Law enforcement undertook a search for Victim at addresses associated with Defendant JONES and identified Defendant BRANN as the likely person who had assisted JONES in taking Victim. Surveillance video from a parking lot outside Victim's father's residence confirmed that BRANN was the man who accompanied JONES on October 23. Law enforcement obtained a court order to access location data for BRANN's phone and tracked it to a residence on Pillsbury Avenue South in Minneapolis. BRANN and JONES were located at the residence along with Victim.

Defendant is in custody.

## 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**

Kristina Schmidt  
Sergeant  
350 S 5th St  
Minneapolis, MN 55415-1389  
Badge: 006371

Electronically Signed:  
10/28/2019 02:00 PM  
Hennepin County, Minnesota

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

**Prosecuting Attorney**

Paige L Starkey  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
10/28/2019 11:56 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 the address listed on the attached court summons 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: \$100,000.00

Conditions of Release: No Contact with Victim; No Contact with Co-Defendant(s); No Possession of Weapons; Make All Appearances; 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: October 28, 2019.

**Judicial Officer**

Susan Burke  
District Court Judge

Electronically Signed: 10/28/2019 02:14 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.

**SERENITY JOY JONES**

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:

## DEFENDANT FACT SHEET

**Name:** SERENITY JOY JONES  
**DOB:** 09/03/1991  
**Address:** 1112 RHODE ISLAND AVE N  
GOLDEN VALLEY, MN 55427

**Alias Names/DOB:**

**SID:** MN18A83376

**Height:**

**Weight:**

**Eye Color:**

**Hair Color:**

**Gender:** FEMALE

**Race:** Black

**Fingerprints Required per Statute:** Yes

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

**Driver's License #:**

**SILS Person ID #:** 870942

**SILS Tracking No.** 3136053

**Case Scheduling Information:** Co-defendant DENNIS MICHAEL BRANN

**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	10/23/2019	609.582.1(a) Burglary-1st Deg-Dwelling-Occupied-Non-Accompl ce Present	Felony	B1193	X	MN0271100	19319673
	Modifier	10/23/2019	609.05.1 Liability for Crimes of Another-Intentional	No-Level	B1193	X	MN0271100	19319673
	Modifier	10/23/2019	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	B1193	X	MN0271100	19319673
	Penalty	10/23/2019	609.582.1 Burglary-1st Degree	Felony	B1193	X	MN0271100	19319673
	Penalty	10/23/2019	609.582.1a Burglary-1st Deg-Occupied Dwelling-Mandatory Minimum	Felony	B1193	X	MN0271100	19319673
2	Charge	10/23/2019	609.26.1(3) Deprive-Custody/Parent Rights-Violation Court Order -Take Minor	Felony	K6C94		MN0271100	19319673
	Penalty	10/23/2019	609.26.6(a)(1) Deprive Another of Custodial or Parental Rights-2Yr Penalty	Felony	K6C94		MN0271100	19319673