

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 19A14779  
Court File No. 27-CR-19-29686

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**State of Minnesota,**  
Plaintiff,

**COMPLAINT**  
Order of Detention

vs.

**RANDALL JERMAINE WATKINS DOB: 11/12/1978**

2653 JAMES AVE N  
MINNEAPOLIS, 55411

Defendant.

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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), 609.19.1, 609.11.9

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 11/28/2019

Control #(ICR#): 19353971

Charge Description: That on or about 11/28/2019, in Hennepin County, Minnesota, Randall Jermaine Watkins, caused the death of Victim 1, a human being, with intent to effect the death of that person or another, but without premeditation, while using and/or possessing a firearm.

Minimum Sentence: 3 YEARS

## STATEMENT OF PROBABLE CAUSE

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

On or about November 28, 2019, officers from the Minneapolis Police Department were dispatched to a 911 call involving a domestic in progress which turned into a shooting call at 2653 James Avenue North, in Minneapolis, Hennepin County, State of Minnesota.

Upon arrival at the residence, officers observed an adult male later identified as RANDALL JERMAINE WATKINS (DOB: 11/12/1978), Defendant herein, at the door to the residence before coming outside and being taken into custody by officers.

Upon entering the residence, officers observed an adult female who was later identified as R.B.G. (DOB: 8/7/1992), Victim 1, laying on her back in the doorway between the kitchen and dining room of the home. Victim 1 was bleeding from what appeared to be a gunshot wound to her left side shoulder area. Officers began life-saving measures on Victim 1.

Officers observed a female child later identified as R.M.W. (DOB: 8/8/2017), Victim 2, in the dining room. When asked where her mom was at, Victim 2 said "she's on the floor." Defendant identified Victim 2 as his child.

Victim 1 was transported to the hospital where she was pronounced deceased.

Officers retrieved a firearm from Defendant's person. The firearm was loaded and was seized as evidence.

Officers spoke with a male witness, Witness A, who arrived at the scene, who advised that Victim 1 was his daughter and that she had called him at 10:08 p.m. advising that Defendant had her trapped and would not let her out of the house.

An autopsy was performed and revealed that Victim 1 died as a result of a single gun shot to the left back, as the bullet traveled through the left lung and heart. The bullet was recovered from Victim 1's body.

Officers spoke with witnesses who were familiar with the "tumultuous" relationship of Defendant and Victim 1. They advised officers that Victim 1 had been attempting to get away from Defendant, and had been staying with Victim 2, at her parents' home most recently. Witnesses advised that Defendant had previously beaten Victim 1, giving her two black eyes and other injuries. Witness A advised that he had previously tried to confront Defendant about the injuries to Victim 1, but that Defendant had shot at him, hitting him in the back with a bullet, on the occasion he attempted to do so. Witnesses advised that Defendant had taken all of Victim 1 and Victim 2's clothing and would not give it back. They advised that earlier on November 28, Defendant had called Victim 1 telling her that she could meet him at the house at 9:30 p.m. and could have her "shit" back. Victim 1 had gotten Victim 2 ready and returned to the James Avenue residence to collect their belongings, after which time the shooting occurred.

Defendant declined to speak with officers.

\*Please be advised that the State will seek an enhanced sentence in this case due to the presence of the child and any other such grounds as may be noticed as required by the rules.

## 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**

Scott A Olson  
Sergeant  
350 S 5th St  
Minneapolis, MN 55415-1389  
Badge: 5315

Electronically Signed:  
12/02/2019 03:34 PM  
Hennepin County, Minnesota

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

**Prosecuting Attorney**

Tara C. Ferguson Lopez  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
12/02/2019 03:14 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 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: \$1,000,000.00

Conditions of Release: No Possession of Weapons; Remain Law Abiding; Make All Appearances; No use of drugs/alcohol;

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: December 2, 2019.

**Judicial Officer**

Ivy S. Bernhardson  
District Court Judge

Electronically Signed: 12/02/2019 03:40 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.

**Randall Jermaine Watkins**

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:** Randall Jermaine Watkins  
**DOB:** 11/12/1978  
**Address:** 2653 JAMES AVE N  
MINNEAPOLIS, 55411

**Alias Names/DOB:**

**SID:** MN17KP9830

**Height:**

**Weight:**

**Eye Color:**

**Hair Color:**

**Gender:** MALE

**Race:** Black

**Fingerprints Required per Statute:** Yes

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

**Driver's License #:**

**SILS Person ID #:** 678501

**SILS Tracking No.** 3142848

**Alcohol Concentration:**

## STATUTE AND OFFENSE GRID

<b>Cnt Nbr</b>	<b>Statute Type</b>	<b>Offense Date(s)</b>	<b>Statute Nbrs and Descriptions</b>	<b>Offense Level</b>	<b>MOC</b>	<b>GOC</b>	<b>Controlling Agencies</b>	<b>Case Numbers</b>
1	Charge	11/28/2019	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2011		MN0271100	19353971
	Modifier	11/28/2019	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2011		MN0271100	19353971
	Penalty	11/28/2019	609.19.1 Murder - 2nd Degree	Felony	H2011		MN0271100	19353971
	Penalty	11/28/2019	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2011		MN0271100	19353971