

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 19A15420
Court File No. 27-CR-19-30898

State of Minnesota,

Plaintiff,

vs.

GIOVANNI VERNELL WILLIAMS DOB: 07/10/1996

1219 OLIVER AVE N
MINNEAPOLIS, MN 55411

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: 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): 12/11/2019

Control #(ICR#): 19005550

Charge Description: That on or about 12/11/2019, in Hennepin County, Minnesota, GIOVANNI VERNELL WILLIAMS, caused the death of Victim D.M.S, a human being, with intent to effect the death of that person or another while using 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 December 11, 2019, at approximately 9:15 p.m., officers were dispatched on a shooting call to the "Pump n' Munch" gas station located at 1505 69th Avenue North in Brooklyn Center, Hennepin County, Minnesota.

When officers arrived, they located an adult male, later identified as Victim D.M.S., who had an apparent gunshot wound to his head. Victim was in the passenger seat of a 2002 Chevy Blazer. An adult female, later identified as Victim's girlfriend and referred to herein as Witness 1, was screaming and holding an article of clothing to Victim's gunshot wound. Despite lifesaving measures by officers and paramedics, Victim died at the scene. There was a handgun on the ground a few feet from Victim's vehicle. There was also a handgun on the passenger floorboard where Victim was sitting. Witness 1 reported that a man named "Giovanni," later identified as Defendant GIOVANNI VERNELL WILLIAMS (07/10/1996) had shot Victim in the head in the course of a drug robbery.

Witness 1 reported that earlier that day, Witness 1 had arranged through a third party ("Witness 2") to sell an ounce of marijuana for \$300. Witness 2 put Witness 1 in touch with Defendant. Witness 1 drove with Victim to meet Defendant at the Pump n' Munch. Defendant arrived shortly thereafter in a black Chrysler 200 with two other males inside. The Chrysler backed into the parking spot next to Victim's vehicle. Defendant then got into the backseat of Victim's vehicle.

Victim had a conversation about the marijuana, then Defendant asked if he could smell it. Once Defendant had the marijuana in his hand, he said, "You know what this is" and fired one shot into Victim's head. Defendant then fled the scene in the Chrysler 200, taking the marijuana with him.

Officers interviewed Witness 2, the person who had set up the drug deal. He confirmed that he had put Witness 1 in touch with Defendant. He stated he had no idea that Defendant was going to rob Witness 1 or Victim.

Officers viewed surveillance footage from the gas station that corroborated Witness 1's account of events. They were able to identify the owner of the Chrysler 200 Defendant had arrived in, and later found out that the owner's son, Witness 3, had the vehicle at the time. Officers located Witness 3 and interviewed him post-Miranda. He confirmed that after they parked the Chrysler, Defendant exited his car and got into someone else's car. He then heard a gunshot and Defendant returned with a bag of marijuana. Witness 3 asked Defendant if he shot someone, and Defendant said no, that someone had shot at him.

Defendant is not in custody, and officers have been looking for him since December 11, 2019. Additionally, Defendant was a suspect in another drug robbery in Moorhead, MN in 2017. He is a risk to public safety and has not turned himself in. His whereabouts are unknown. As such, your complainant requests that complaint issue via warrant.

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

Charles Valleau
Detective
6645 Humboldt Avenue N
Brooklyn Center, MN 55430
Badge: 141

Electronically Signed:
12/16/2019 03:07 PM
Hennepin County, Minnesota

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

Prosecuting Attorney

Leah Erickson
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
12/16/2019 02:59 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: \$2,000,000.00

Conditions of Release: No Possession of Weapons; Remain Law Abiding; Make All Appearances; Surrender Passport; No Contact with Witnesses;

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 16, 2019.

Judicial Officer Jay Quam Electronically Signed: 12/16/2019 03:14 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.

GIOVANNI VERNELL WILLIAMS

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: GIOVANNI VERNELL WILLIAMS
DOB: 07/10/1996
Address: 1219 OLIVER AVE N
MINNEAPOLIS, MN 55411

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 #: 778100

SILS Tracking No. 3145864

Case Scheduling Information: This case is DESIGNATED CONFIDENTIAL by Order of the Court.

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	12/11/2019	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2012		MN0270200	19005550
	Modifier	12/11/2019	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2012		MN0270200	19005550
	Penalty	12/11/2019	609.19.1 Murder - 2nd Degree	Felony	H2012		MN0270200	19005550
	Penalty	12/11/2019	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2012		MN0270200	19005550