

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 20A07755
Court File No. 27-CR-20-15170

State of Minnesota,
Plaintiff,

COMPLAINT
Warrant

vs.

DONELL DEON FLOWERS DOB: 09/01/1995
NPA - IN FEDERAL CUSTODY
Defendant.

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: 609.229.3(a), 609.11.5(a), 609.05.1, 609.05.2, 609.19.1, 609.11.9

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 06/04/2020

Control #(ICR#): 20152372

Charge Description: That on or about 6/4/2020, in Hennepin County, Minnesota, DONELL DEON FLOWERS, acting alone or intentionally aiding, advising, hiring, or conspiring with another, or otherwise procured the other to commit the crime, for the benefit of, at the direction of, in association with or motivated by involvement with a criminal gang, with the intent to promote, further, or assist in criminal conduct by gang members, caused the death of victim, a human being, with intent to effect the death of that person or another, but without premeditation, 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 June 4, 2020, at approximately 9:11 p.m., Minneapolis Police (MPD) responded to a report of a shooting at North Memorial Medical Center / Hospital (NMMC). Further information received was that a male was found to be DOA in a white vehicle. No other information.

A Shot Spotter activation at 34th Avenue and Dupont Avenue North recorded multiple shots just prior to officers receiving the dispatch to NMMC. Upon arriving at the hospital, police learned that a nurse came to work and observed a white SUV with someone inside. Hospital security went out to the car, and initially thought that the motionless male inside (hereinafter, "victim") had overdosed, so he administered Narcan to the victim. Security then noticed a gunshot wound to the back of the victim's head, and the victim was pronounced dead at the scene.

Police noticed that the rear window of the white SUV ("Jeep") was shattered, and there appeared to be a number of bullet defects to the body of the vehicle.

Subsequent investigation revealed that prior to the shooting, the victim was in the front passenger seat of the white Jeep. The driver was an identified male, referred to as Witness 1. Witness 1 and victim drove through the intersection of 34th Avenue North and Dupont Avenue North and observed a black Tahoe that was parked there.

Witnesses at the scene of the shooting observed the white Jeep slow down, and there appeared to be a verbal exchange with four males who were standing outside the Tahoe. Witnesses heard a couple of gunshots and ducked down. There was then a "rain" of multiple gunshots, and the four males who were standing outside the Tahoe all appeared to be shooting at the white Jeep as it drove away westbound on 34th Avenue North. Shot Spotter recorded the gunfire to occur at 7:49 p.m. Thirty-six (36) gunshots were recorded. Fifty-one (51) shell casings were later recovered by MPD's Crime lab.

The victim was driven to NMMC and found dead inside the vehicle with a gunshot wound to the back of his head.

Three of the male shooters were identified through confirmatory photos. One of the males was identified as Defendant, DONELL DEON FLOWERS, DOB 9/1/95 (herein referred to as FLOWERS). Two others were identified as an EDWARD LEE, DOB 8/6/88 ("Rocky"), and TYLAN DEAONTAE BLAND, DOB 10/11/87 ("Man -Man").

Investigation revealed that the victim and Witness 1 were Low-End gang members and were reportedly driving through the area of the shooting. This neighborhood is known by law enforcement to be frequented by members of the Tre Tre Crips criminal street gang. Tre Tre Crips are rivals to the "Lows" or Low-End gang members, and this rivalry manifests itself in assaults, drive-by shootings, and murder.

An identified individual, referred to hereinafter as "Witness 2," stated that there had been a group of males near the area of 36th and Colfax Avenue North watching every vehicle that drove by, and looking for the "ops." "Ops" is a street term to describe rival gang members. When the group saw the white Jeep drive by more than once, they got into their vehicles and drove to 34th and Dupont Avenue North, where they appeared to wait for the vehicle to return. Witness 2 entered a house, and shortly thereafter heard dozens of gunshots.

Before the shooting took place, Witness 2 observed FLOWERS with a "Tech-9" or similar type firearm, EDWARD LEE had an extended magazine handgun, and TYLAN DEAONTAE BLAND appeared to have a .357 or similar handgun.

A police report was made by an identified female, hereinafter "Witness 3." Witness 3 told police that on the night of this shooting, FLOWERS retrieved his baby and placed the baby in the vehicle he was using. Witness 3 indicated it was a black Chevy Yukon. This occurred at the intersection of 35th and Emerson Avenue North, which is two blocks from the scene of the shooting. Witness 3 gave police the cell phone number for FLOWERS, which police confirmed through FLOWERS's probation officer. Search warrants for his cell service provider were executed, and his cell site tower information was mapped out by the F.B.I. This information showed FLOWERS's phone to be in the area of the crime at the time of the murder.

FLOWERS was taken into custody on July 6, 2020 at a convenience store on the 3600 Block of Penn Avenue North. He dropped a loaded .380 handgun onto the ground before he was taken into custody. In the vehicle that he arrived in was a 9mm handgun with two other males.

In post-Miranda, recorded interview, FLOWERS first denied being in the area of the murder on that day at all and stated that was a "fact." When he was shown the cell phone mapping reports that placed his phone in the area of the crime at the time it occurred, FLOWERS changed his story and said he may have been in the area. Later he stated that he was in the area only after the shooting took place. When he was told about the report that he picked up his child two blocks away from where the murder occurred, before the murder happened, he again changed his story and now agreed that he was in the area just before the shooting happened but would not admit to being in the immediate area when the shooting happened or being one of the shooters.

FLOWERS admitted that he is a member of the Tre Tre Crips, and that he has been a member since 2012. FLOWERS also admitted that the victim was a part of rival gang that is the Tre Tre Crips primary "ops." He admitted to possessing the .380 extended magazine handgun that was found when he was arrested and also admitted to recklessly shooting it off on three separate occasions two days ago.

FLOWERS remains in custody on Federal probation for a weapons offense.

Manner of death for the victim was ruled a homicide by the Hennepin County Medical Examiner. The cause of death was a gunshot wound to the head.

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

Mark Suchta
Sergeant
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 6995

Electronically Signed:
07/07/2020 02:24 PM
Hennepin County, Minnesota

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

Prosecuting Attorney

Thad Tudor
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
07/07/2020 02:11 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:

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: July 7, 2020.

Judicial Officer Luis Bartolomei Electronically Signed: 07/07/2020 02:31 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.

DONELL DEON FLOWERS

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: DONELL DEON FLOWERS
DOB: 09/01/1995
Address: NPA - IN FEDERAL CUSTODY

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 #: 749736
SILS Tracking No. 3178176
Case Scheduling Information: WARRANT REQUEST: FLOWERS remains in custody on Federal probation for a weapons offense. Warrant for service purposes, as in custody elsewhere.

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	6/4/2020	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2812	X	MN0271100	20152372
	Modifier	6/4/2020	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	H2812	X	MN0271100	20152372
	Penalty	6/4/2020	609.19.1 Murder - 2nd Degree	Felony	H2812	X	MN0271100	20152372
	Modifier	6/4/2020	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2812	X	MN0271100	20152372
	Penalty	6/4/2020	609.229.3(a) Crime Committed for Benefit of Gang-Commit Felony	Felony	H2812	X	MN0271100	20152372
	Penalty	6/4/2020	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2812	X	MN0271100	20152372
	Modifier	6/4/2020	609.05.1 Liability for Crimes of Another-Intentional	No-Level	H2812	X	MN0271100	20152372