

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 20A08472  
Court File No. 27-CR-20-16374

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**State of Minnesota,**

Plaintiff,

vs.

**JACOB DANIEL MCPHEETERS DOB: 07/24/1992**

8601 Elliot Ave S  
Bloomington, MN 55420

Defendant.

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**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), 609.17.4(2), 609.19.1, 609.11.9

Maximum Sentence: HALF OF 40 YEARS

Offense Level: Felony

Offense Date (on or about): 07/24/2020

Control #(ICR#): 20006466

Charge Description: That on or about 7/24/2020, in Hennepin County, Minnesota, JACOB DANIEL MCPHEETERS attempted to cause 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

**COUNT II**

**Charge: Assault-1st Degree-Great Bodily Harm**

Minnesota Statute: 609.221.1, with reference to: 609.221.1, 609.11.5(a), 609.101.2

Maximum Sentence: 20 YEARS AND/OR \$30,000

Offense Level: Felony

Offense Date (on or about): 07/24/2020

Control #(ICR#): 20006466

Charge Description: That on or about 7/24/2020, in Hennepin County, Minnesota, JACOB DANIEL MCPHEETERS assaulted Victim and inflicted great bodily harm, while using a firearm.

Minimum Sentence: 3 YEARS

**COUNT III**

**Charge: Assault-2nd Degree-Dangerous Weapon-Substantial Bodily Harm**

Minnesota Statute: 609.222.2, with reference to: 609.222.2, 609.11.5(a), 609.101.2

Maximum Sentence: 10 YEARS AND/OR \$6,000-\$20,000

Offense Level: Felony

Offense Date (on or about): 07/24/2020

Control #(ICR#): 20006466

Charge Description: That on or about 7/24/2020, in Hennepin County, Minnesota, JACOB DANIEL MCPHEETERS assaulted Victim and inflicted substantial bodily harm, while using a firearm.

Minimum Sentence: 3 YEARS

#### **COUNT IV**

**Charge: Possess Ammo/Any Firearm - Conviction or Adjudicated Delinquent for Crime of Violence**

Minnesota Statute: 624.713.1(2), with reference to: 609.11.5(b), 624.713.2(b)

Maximum Sentence: 15 YEARS AND/OR \$30,000

Offense Level: Felony

Offense Date (on or about): 07/24/2020

Control #(ICR#): 20006466

Charge Description: That on or about 7/24/2020, in Hennepin County, Minnesota, JACOB DANIEL MCPHEETERS possessed ammunition or a firearm and JACOB DANIEL MCPHEETERS has been convicted or adjudicated delinquent in this state or elsewhere of a crime of violence, Third Degree Controlled Substance Offense on 2/11/19, for which the sentence or court supervision expired on or after August 1, 1993.

Minimum Sentence: 5 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 July 24, 2020, at approximately 3:15 a.m., Bloomington police officers responded to a shooting that occurred outside the Days Inn Hotel located on Normandale Boulevard, in Bloomington, Hennepin County, Minnesota. Upon arrival, officers met with a hotel employee. The employee stated earlier, he was outside the hotel when he heard a gunshot coming from the north end of the parking lot. He looked over and saw several people gathered around a camper near a couple vehicles. The people were yelling, and it appeared one of the people had been shot because she was leaning on another person. The people all got into the vehicles and left the area. Officers proceeded to the trailer and observed a pool of blood on the ground outside the trailer.

As officers were investigating, they received reports that a female was brought to the Fairview Southdale Hospital emergency room with a gunshot wound. Officers proceeded to the hospital and met with female Victim. Victim was receiving treatment for a significant gunshot wound. Officers observed two very large holes in Victim's upper torso/chest area that appeared to be an entry wound and exit wound. Victim stated she was shot by her boyfriend, identified as JACOB DANIEL MCPHEETERS (DOB: 7/24/92), hereinafter "Defendant." Victim stated she was at the camper outside the Days Inn earlier with Defendant when they got into an argument. During the argument, Defendant shot Victim in the chest once with a revolver handgun. Victim stated Defendant had two handguns with him at the time. Due to the severity of the injuries, Victim had to be transported to Hennepin County Medical Center (HCMC) for treatment. Doctors indicated the bullet entered Victim's torso, broke several ribs, struck a part of her lungs and broke more ribs as it exited her torso. Victim is currently in the Intensive Care Unit at HCMC and in critical condition.

At the hospital, officers spoke with two witnesses to the shooting, a male and female. The witnesses are boyfriend/girlfriend and were staying in the camper parked outside the Days Inn hotel that night. The witnesses stated Defendant and Victim are their friends. Earlier that night, Defendant and Victim came to their camper. When they arrived, Defendant and Victim were already arguing, and Victim was crying. Defendant told them he was angry because he was going to prison and could not trust Victim. The witnesses were aware Defendant had pending drug charges in the State of Wisconsin. The witnesses indicated Defendant came into their camper holding a semi-automatic handgun and started grabbing Victim. Defendant then pointed the gun at Victim and tried to drag her out of the camper. At one point, Defendant put the gun in his pocket and started choking Victim by putting his arm around her throat. One of the witnesses took this opportunity to take the gun from Defendant. The witness put the gun in her car but believed Defendant took it back at some point.

Moments later, Defendant went to his car and came back with another gun, a revolver this time. Defendant walked up to Victim, who was standing outside the camper with the witnesses, and shot Victim one time in the torso from "point blank" range. After the shot, Defendant continued to yell at Victim and told her to get in his car. The witnesses told Defendant to take Victim to the hospital. Defendant then left in his vehicle with Victim. The witnesses believed Defendant may have fled to Wisconsin. Defendant has pending drug charges in Wisconsin and had talked about "taking care" of someone who was involved in that case. The witnesses also believed Defendant has pipe bombs in his vehicle.

Later that morning, investigators used Defendant's cell phone to locate Defendant. Defendant was arrested and his vehicle was impounded. During a search of Defendant's vehicle, officers located a semi-automatic handgun and a .44 caliber revolver handgun inside the vehicle. Officers also found what appeared to be three pipe bombs inside the vehicle. Defendant is currently being held in Wisconsin on

pending charges.

Defendant has several prior felony convictions, including a Third Degree Controlled Substance Offense on February 11, 2019, in Hennepin County File No. 27-CR-18-19693; Fifth Degree Controlled Substance Offense on February 11, 2019, in Hennepin County File No. 27-CR-18-29762; and Fourth Degree Assault on February 19, 2019, in Hennepin County File No. 27-CR-18-31112. Defendant has a pending Fourth Degree Assault charge in Hennepin County File No. 27-CR-19-14114, and several pending felony charges in Wisconsin. The State does not believe Defendant will appear for court voluntarily and Defendant poses a threat to public safety. The State respectfully requests a warrant issue with this complaint.

## 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**

George Harms  
Detective  
1800 W Old Shakopee Road  
Bloomington, MN 55431  
Badge: 241

Electronically Signed:  
07/24/2020 03:00 PM  
Hennepin County, Minnesota

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

**Prosecuting Attorney**

Kevin C Lin  
Assistant County Attorney  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
07/24/2020 02:54 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 Contact with Victim; No Contact with Witnesses; No use of drugs/alcohol; Random UAs; No Possession of Weapons

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 24, 2020.

**Judicial Officer**                      Luis Bartolomei                      Electronically Signed: 07/24/2020 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.

**JACOB DANIEL MCPHEETERS**

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:** JACOB DANIEL MCPHEETERS  
**DOB:** 07/24/1992  
**Address:** 8601 Elliot Ave S  
Bloomington, MN 55420

**Alias Names/DOB:**

**SID:**

**Height:**

**Weight:**

**Eye Color:**

**Hair Color:**

**Gender:** MALE

**Race:** White

**Fingerprints Required per Statute:** Yes

**Fingerprint match to Criminal History Record:** No

**Driver's License #:**

**SILS Person ID #:** 821872

**SILS Tracking No.** 3180483

**Case Scheduling Information:** WARRANT: Defendant is currently being held in Wisconsin on pending charges; Defendant has several prior felony convictions in this State (see complaint) and several pending felony charges in Wisconsin. The State does not believe Defendant will appear for court voluntarily and Defendant poses a threat to public safety. The State respectfully requests a warrant issue with this complaint.

**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       | 7/24/2020       | 609.19.1(1)<br>Murder - 2nd Degree - With Intent-Not Premeditated                                      | Felony        | H2011 | A   | MN0270100            | 20006466     |
|         | Penalty      | 7/24/2020       | 609.19.1<br>Murder - 2nd Degree  | Felony        | H2011 | A   | MN0270100            | 20006466     |
|         | Modifier     | 7/24/2020       | 609.11.9<br>Minimum Sentences of Imprisonment - Applicable Offenses                                    | No-Level      | H2011 | A   | MN0270100            | 20006466     |
|         | Penalty      | 7/24/2020       | 609.11.5(a)<br>Minimum Sentences of Imprisonment-Firearm Use or Possession                             | Felony        | H2011 | A   | MN0270100            | 20006466     |
|         | Penalty      | 7/24/2020       | 609.17.4(2)<br>Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended                                    | Felony        | H2011 | A   | MN0270100            | 20006466     |
| 2       | Charge       | 7/24/2020       | 609.221.1<br>Assault-1st Degree-Great Bodily Harm  | Felony        | A1121 |     | MN0270100            | 20006466     |
|         | Definition   | 7/24/2020       | 609.101.2<br>Minimum Fines – Victim Assistance Programs  | No-Level      | A1121 |     | MN0270100            | 20006466     |
|         | Penalty      | 7/24/2020       | 609.11.5(a)<br>Minimum Sentences of Imprisonment-Firearm Use or Possession                             | Felony        | A1121 |     | MN0270100            | 20006466     |
|         | Penalty      | 7/24/2020       | 609.221.1<br>Assault-1st Degree-Great Bodily Harm  | Felony        | A1121 |     | MN0270100            | 20006466     |
| 3       | Charge       | 7/24/2020       | 609.222.2<br>Assault-2nd Degree-Dangerous Weapon-Substantial Bodily Harm                               | Felony        | A2221 |     | MN0270100            | 20006466     |
|         | Definition   | 7/24/2020       | 609.101.2<br>Minimum Fines – Victim Assistance Programs  | No-Level      | A2221 |     | MN0270100            | 20006466     |
|         | Penalty      | 7/24/2020       | 609.11.5(a)<br>Minimum Sentences of Imprisonment-Firearm Use or Possession                             | Felony        | A2221 |     | MN0270100            | 20006466     |
|         | Penalty      | 7/24/2020       | 609.222.2<br>Assault-2nd Degree-Dangerous Weapon-Substantial Bodily Harm                               | Felony        | A2221 |     | MN0270100            | 20006466     |
| 4       | Charge       | 7/24/2020       | 624.713.1(2)<br>Possess Ammo/Any Firearm - Conviction or Adjudicated Delinquent for Crime of Violence  | Felony        | W1623 |     | MN0270100            | 20006466     |
|         | Penalty      | 7/24/2020       | 624.713.2(b)<br>Possesses any type of firearm/ammo - Crime of Violence - ineligible under 624.713.1(2) | Felony        | W1623 |     | MN0270100            | 20006466     |
|         | Penalty      | 7/24/2020       | 609.11.5(b)<br>Minimum Sentences of Imprisonment-Firearm-Felon Convicted Crime of Violence             | Felony        | W1623 |     | MN0270100            | 20006466     |