

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 20A07761
Court File No. 27-CR-20-15172

State of Minnesota,

Plaintiff,

vs.

JEROME DRELL RANDLE DOB: 03/13/1991

1689 Edgemont
Maplewood, MN

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), 609.05.1, 609.05.2, 609.19.1, 609.11.9

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 06/21/2020

Control #(ICR#): 20167603

Charge Description: That on or about 6/21/2020, in Hennepin County, Minnesota, JEROME DRELL RANDLE, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another, or otherwise procuring the other to commit the crime 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 6/21/20, Minneapolis Police officers responded to a shooting that occurred in the area of the Habon Grille in South Minneapolis. In this incident, several people were hit by gunfire and transported to Hennepin Healthcare Hospital. An identified male, initials C.P., arrived at the hospital on that evening with a gunshot wound to his torso area. It was presumed at this time that he was one of the shooting victims from the Habon Grille incident, based on the timing of his arrival. Officers were not able to speak with C.P. since he went immediately into surgery, and died shortly afterwards.

Investigators learned that C.P. and a male initially identified as, "Greg," were fighting one on one and then, "Duggie" and, "G-Black" jumped in on Greg's behalf and assisted in assaulting C.P. Using social media photographs, informant(s), and known photographs from law enforcement data bases, "Greg," was identified as GREGORY EASLEY, DOB 7/27/89. "Duggie," was identified as SIRVONTE STEVIE VARNER, DOB 02/06/88, and "G-Black," was identified as JEROME RANDLE, DOB 01/13/91.

On 6/22/20, MPD investigators obtained a video posted on social media that captured most of the 6/21/20 assault on C.P. The video showed C.P. physically fighting with another black male at the Target Center at 600 1st Avenue North. There were multiple people standing around and watching the fight. C.P. appeared to be winning the fight, and EASLEY approaches C.P. and punched him in the head. RANDLE then approached C.P. and pistol whipped him in the back of the head.

The next portion of the video was a person recording from inside of a vehicle that C.P. approached. C.P. was bleeding, hunched over, and walked up to the driver and said, "I am hit bro, call the police bro."

Investigators also obtained surveillance video from nearby business that captured the incident. One video showed that at 12:38 a.m. (camera timestamp) at 6th Street and First Avenue North, C.P. was backed up against the wall of the Target center. EASLEY and VARNER were assaulting C.P and had him surrounded, and RANDLE continued to stay in the background. Investigators observed that RANDLE had his right hand over his front right pocket, consistent with possessing a firearm.

As C.P. continues to defend himself from the assault, and moved away from the three suspects, they continued to move towards C.P. The surveillance video captured what appeared to be a handgun grip protruding out of RANDLE's front right pocket.

The fight gradually moved towards 7th Street in front of the Target Center. Surveillance showed VARNER to have his right arm around C.P.'s neck, with VARNER trying to pull C.P. down to the ground. EASLEY punched C.P. twice in the back of head and neck. The fight moved off camera, with RANDLE still lagging behind, and appearing to have his right hand fully around the grip of the handgun in his front right pocket.

At 12:41 a.m., C.P. crossed First Avenue North near 7th Street, with the three suspects pursuing and assaulting him. At 12:42 a.m., the very large crowd that had gathered to witness the assault began to immediately disperse from the northeast corner of this intersection, consistent with how a crowd responds after hearing gunfire. Next, C.P. was seen crossing over to the southwest corner of the intersection and getting inside a vehicle which drives west bound on 7th Street.

Still shots of all suspects shown to officers from the St. Paul Gangs Unit. They corroborated the identification of the three male suspects as VARNER, EASLEY, and RANDLE.

On 6/23/20, police interviewed Witness 1. Witness 1 told them that on the night of the incident he was downtown with C.P. at a bar. They walked over to 6th Street, where they observed, "D.B." C.P told Witness 1 he took a, "lot of stuff," from, "D.B." Witness 2 went and sat down in a female's car who then told him that C.P. was in a physical fight. Witness 1 stated he did not intervene because C.P. knew that he had to fight "D.B."

Witness 1 observed the fight to go over to Target Center. Witness 1 attempted to help C.P., but the male who he saw pistol whip C.P. pulled out the gun, and said to Witness 1, "This isn't for you. But if you run up it will be." Witness 1 indicated that the man who pistol whipped C.P. had to be the person who shot him, and that was the only person who Witness 2 observed with a gun.

Witness 1 told investigators he had seen the Facebook video of the incident. Witness 1 was familiar with all three suspects, and he knew them as, "Duggie fresh," "DB the rapsta," and "G-Black." Confirmatory photos were sent to Witness 1 and he identified the males in the pictures as the three suspects he saw assaulting C.P.

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 02:41 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 02:33 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 Co-Defendant(s)

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
District Court Judge

Electronically Signed: 07/07/2020 02:49 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.

JEROME DRELL RANDLE

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: JEROME DRELL RANDLE
DOB: 03/13/1991
Address: 1689 Edgemont
Maplewood, MN

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 #: 699847

SILS Tracking No. 3178219

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	6/21/2020	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2012	X	MN0271100	20167603
	Penalty	6/21/2020	609.19.1 Murder - 2nd Degree	Felony	H2012	X	MN0271100	20167603
	Modifier	6/21/2020	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2012	X	MN0271100	20167603
	Modifier	6/21/2020	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	H2012	X	MN0271100	20167603
	Penalty	6/21/2020	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2012	X	MN0271100	20167603
	Modifier	6/21/2020	609.05.1 Liability for Crimes of Another-Intentional	No-Level	H2012	X	MN0271100	20167603