

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 20A07777  
Court File No. 27-CR-20-15214

---

**State of Minnesota,**

Plaintiff,

vs.

**ZACHARY VICTOR ROBINSON DOB: 02/16/1993**

951 Marion St Apt 1  
St. Paul, MN 55117

Defendant.

---

**COMPLAINT**

Warrant

Amended

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), 609.11.4, 609.19.1, 609.11.9

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 07/05/2020

Control #(ICR#): 20177599

Charge Description: That on or about 7/5/2020, within the city of Minneapolis, in Hennepin County, Minnesota, Zachary Victor Robinson 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 a firearm.

Minimum Sentence: 3 YEARS, 1 YEAR AND 1 DAY

**COUNT II**

**Charge: Murder-Unborn Child-2nd Deg-Not Premeditated**

Minnesota Statute: 609.2662(1), with reference to: 609.2662, 609.11.5(a)

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 07/05/2020

Control #(ICR#): 20177599

Charge Description: That on or about 7/5/2020, within the city of Minneapolis, in Hennepin County, Minnesota, Zachary Victor Robinson, caused the death of an unborn child, with intent to effect the death of that person, or another, without premeditation, while using a firearm.

Minimum Sentence: 3 YEARS

### COUNT III

**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): 07/05/2020

Control #(ICR#): 20177599

Charge Description: That on or about 7/5/2020, within the city of Minneapolis, in Hennepin County, Minnesota, Zachary Victor Robinson possessed ammunition or a firearm and Zachary Victor Robinson has been convicted or adjudicated delinquent in this state or elsewhere of a crime of violence for which the sentence or court supervision expired on or after August 1, 1993.

Minimum Sentence: 5 YEARS

### COUNT IV

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

Minnesota Statute: 609.222.2, with reference to: 609.222.2, 609.11.5(a), 609.11.4, 609.101.2

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

Offense Level: Felony

Offense Date (on or about): 07/05/2020

Control #(ICR#): 20177599

Charge Description: That on or about 7/5/2020, within the city of Minneapolis, in Hennepin County, Minnesota, Zachary Victor Robinson assaulted Victim 2 and inflicted substantial bodily harm, while using a firearm.

Minimum Sentence: 3 YEARS, 1 YEAR AND 1 DAY

## STATEMENT OF PROBABLE CAUSE

THE OFFENSE PORTION HAS BEEN AMENDED TO CHANGE COUNT TWO FROM ASSAULT OF UNBORN CHILD-1ST DEGREE TO MURDER-UNBORN CHILD-2ND DEG-NOT PREMEDITATED. THE PROBABLE CAUSE PORTION HAS BEEN AMENDED TO INCORPORATE FACTS PERTAINING TO THAT OFFENSE, IN ALL CAPS.

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

On July 5, 2020, Minneapolis Police were dispatched to a shooting at the George Floyd Memorial site at 38th Street East and Chicago Avenue South within the city of Minneapolis, Hennepin County, State of Minnesota. Officers arrived to find Victim 1, an unconscious pregnant female, removed from a vehicle with life-saving measures being performed by bystanders.

At the scene, police spoke with Witnesses 2 and 3, who saw Victim 1 arguing with someone outside of the vehicle at 37th Street East and Chicago Avenue. Witnesses heard approximately three gunshots, and Victim 1's vehicle traveled the one block distance to its stopping point at 37th Avenue and Elliot Avenue. When the vehicle stopped, witnesses saw Witness 1 get out of the passenger side screaming for help.

Victim 1 had been driving a Ford Explorer vehicle with one passenger, Witness 1, a family member. When officers approached the stopped vehicle they observed a bullet fragment on the driver's front seat. In addition, both sides of rear windows were shot out. Officers also observed the front driver's side tire was flat. EMS personnel transported Victim 1 to the hospital where doctors located a gunshot wound to her upper back torso area, and Victim 1 was pronounced dead. Victim 1 was approximately twenty weeks pregnant. Doctors were able to deliver the unborn child, who survived, but was in critical condition.

Victim 2 saw "Snoop" in the parking lot, who was later identified as ZACHARY VICTOR ROBINSON (DOB: 02/16/1993), the Defendant herein. Victim 2 described the Defendant as a black male, twenty to thirty years old, wearing a t-shirt and blue jeans.

Victim 2 arrived at the hospital shortly after with a gunshot wound to the right foot. Victim 2 had been working in a peacekeeping role at the memorial when the shooting occurred. Victim 2 saw the Defendant shooting at Victim 1's vehicle as it drove away from the parking lot. Victim 2 confronted the Defendant asking him what he was doing. Victim 2 described the Defendant's gun as a compact style handgun. The Defendant got upset at Victim 2, stating, "Fuck you too," and then shot him in the foot with the same gun.

A couple of days later, Minneapolis police investigators spoke with Witness 4 who was concerned for his safety as he witnessed the entire encounter. Witness 4 provided to police a photograph of the Defendant as the person he saw shooting to help investigators identify the Defendant. Witness 4 was sitting on the steps across the street when Victim 1's vehicle pulled out of a parking lot and traveled north on Chicago Avenue. The Defendant then steps out from the parking lot, shoots at the Victim's vehicle several times and then places the gun into his waistband. When the Defendant walks back to the parking lot he is confronted by Victim 2. Witness 4 watched the Defendant remove the gun from his waistband, heard him say, "Don't talk to me," and shoot Victim 2. The Defendant then fled the scene.

Minneapolis Police received written Crime Stopper tips that the shooter is the "father" of Victim 1's child and that the black male shot his "wife." The Defendant is the known significant other with Victim 1 and the father to her child.

Investigators obtained medical records for the baby girl victim (herein after "Baby Victim") who was delivered by hospital doctors based on the victim's fatal injury. The Baby Victim was born weighing only 891 grams and with only 26 weeks gestational period. The Baby Victim suffers from hypotension, neonatal seizures, neonatal jaundice, had a successful cardiopulmonary resuscitation, and continues to suffer from respiratory distress in critical condition. Withdrawal of medical treatment would result in organ failure and/or fatal deterioration.

ON AUGUST 5, 2020 BABY VICTIM WAS REMOVED FROM LIFE SUPPORT AFTER AN MRI SHOWED NO BRAIN ACTIVITY. BABY VICTIM PASSED AWAY AT 12:58 A.M. ON AUGUST 5, 2020.

The Defendant is prohibited from possession of a firearm due to the following prior felony convictions:

Felony 1st Degree Assault with conviction on April 20, 2010 in Hennepin County Court file 27-CR-10-3128;  
Felony 2nd Degree Assault with conviction on April 20, 2010 in Hennepin County Court file 27-CR-10-3128;

Felony 1st Degree Assault with certified adult conviction on January 17, 2009 in Hennepin County Court file 27-JV-09-11905;

Felony 2nd Degree Assault with certified adult conviction on January 17, 2009 in Hennepin County Court file 27-JV-09-11905;

Felony 2nd Degree Assault with certified adult conviction on January 17, 2009 in Hennepin County Court file 27-JV-09-11905.

The Defendant currently has the following pending cases:

Misdemeanor 5th Degree Assault in Hennepin County Court file 27-CR-19-27804; and

Felony 2nd Degree Assault with a Firearm in Hennepin County Court file 27-CR-19-30658;

Felony Possession of a Firearm with Prior Convictions for Crime of Violence in Hennepin Court file 27-CR-19-30658; and

Felony Possession of a Firearm with Prior Convictions for Crime of Violence in Hennepin Court file 27-CR-20-9345.

The Defendant REMAINS IN THE CUSTODY OF THE HENNEPIN COUNTY JAIL.

## 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**

Matt C Wentz  
Sgt.  
350 S 5th St  
Minneapolis, MN 55415-1389  
Badge: 7640

Electronically Signed:  
08/06/2020 12:08 PM  
Hennepin County, Minnesota

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

**Prosecuting Attorney**

Kali A. Gardner  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
08/06/2020 12:02 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: August 6, 2020.

**Judicial Officer**

Luis Bartolomei  
District Court Judge

Electronically Signed: 08/06/2020 12:11 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.

**Zachary Victor Robinson**

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:** Zachary Victor Robinson  
**DOB:** 02/16/1993  
**Address:** 951 Marion St Apt 1  
St. Paul, MN 55117

**Alias Names/DOB:** Zachary Victor Robinson Jr DOB: 2/16/1993  
**SID:** MN10CS7660

**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 #:** 672073  
**SILS Tracking No.** 3178239  
**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	7/5/2020	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2811		MN0271100	20177599
	Penalty	7/5/2020	609.19.1 Murder - 2nd Degree	Felony	H2811		MN0271100	20177599
	Modifier	7/5/2020	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2811		MN0271100	20177599
	Penalty	7/5/2020	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2811		MN0271100	20177599
	Penalty	7/5/2020	609.11.4 Minimum Sentences of Imprisonment-Use Dangerous Weapon	Felony	H2811		MN0271100	20177599
2	Charge	7/5/2020	609.2662(1) Murder-Unborn Child-2nd Deg-Not Premeditated	Felony	H2814		MN0271100	20177599
	Penalty	7/5/2020	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2814		MN0271100	20177599
	Penalty	7/5/2020	609.2662 Murder-Unborn Child-2nd Degree	Felony	H2814		MN0271100	20177599
3	Charge	7/5/2020	624.713.1(2) Possess Ammo/Any Firearm - Conviction or Adjudicated Delinquent for Crime of Violence	Felony	W1143		MN0271100	20177599
	Penalty	7/5/2020	624.713.2(b) Possesses any type of firearm/ammo - Crime of Violence - ineligible under 624.713.1(2)	Felony	W1143		MN0271100	20177599
	Penalty	7/5/2020	609.11.5(b) Minimum Sentences of Imprisonment-Firearm-Felon Convicted Crime of Violence	Felony	W1143		MN0271100	20177599
4	Charge	7/5/2020	609.222.2 Assault-2nd Degree-Dangerous Weapon-Substantial Bodily Harm	Felony	A2223		MN0271100	20177599
	Penalty	7/5/2020	609.11.4 Minimum Sentences of Imprisonment-Use Dangerous Weapon	Felony	A2223		MN0271100	20177599
	Definition	7/5/2020	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A2223		MN0271100	20177599
	Penalty	7/5/2020	609.222.2 Assault-2nd Degree-Dangerous Weapon-Substantial Bodily Harm	Felony	A2223		MN0271100	20177599
	Penalty	7/5/2020	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	A2223		MN0271100	20177599