

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 20A08214
Court File No. 27-CR-20-15858

State of Minnesota,

Plaintiff,

vs.

SHI SHO DOB: 09/15/2001

4020 Hubbell, #211
Des Moines, IA 50317

Defendant.

COMPLAINT

Order of Detention

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: Assault-2nd Degree-Dangerous Weapon

Minnesota Statute: 609.222.1, with reference to: 609.222.1, 609.11.4, 609.101.2

Maximum Sentence: 7 YEARS AND/OR \$4,200-\$14,000

Offense Level: Felony

Offense Date (on or about): 07/16/2020

Control #(ICR#): 20200460

Charge Description: That on or about 7/16/2020, in Crystal, Hennepin County, Minnesota, SHI SHO, assaulted Victim, while using a dangerous weapon.

Minimum Sentence: 1 YEAR AND 1 DAY

COUNT II

Charge: Fleeing a Peace Officer in a Motor Vehicle

Minnesota Statute: 609.487.3, with reference to: 609.487.3

Maximum Sentence: 3 YEARS AND 1 DAY AND/OR \$5,000

Offense Level: Felony

Offense Date (on or about): 07/16/2020

Control #(ICR#): 20200460

Charge Description: That on or about 7/16/2020, in Hennepin County, Minnesota, SHI SHO did by means of a motor vehicle, flee or attempt to flee from a peace officer acting in the lawful discharge of an official duty, who SHI SHO knew or reasonably should have known was a peace officer.

STATEMENT OF PROBABLE CAUSE

Complainant, a licensed peace officer with the Minnesota BCA, has investigated the facts and circumstances of this offense and believes the following establishes probable cause:

On July 16, 2020, the Minnesota State Patrol attempted to conduct a traffic stop on a vehicle. However, the vehicle did not stop, leading to a police pursuit. The suspect vehicle entered into the city of Crystal, Hennepin County, Minnesota, at which time the Crystal Police joined the pursuit. Eventually, law enforcement was able to box in the suspect vehicle. As officers were trying to arrest the driver, the driver of the vehicle, later identified as SHI SHO, the defendant herein, started ramming squad cars with his vehicle. During this action, the defendant struck a Crystal Police Officer with his vehicle.

Law Enforcement located a witness who recorded a portion of the incident on their cell phone. Complainant viewed the video which showed the defendant's vehicle stopped with several uniformed officers around it, along with several police cars. One of the officers, in an attempt to effectuate an arrest, attempted to break the front driver side window. The vehicle then reversed and appeared to hit another car before pinning the victim up against a squad car. The suspect vehicle then started moving forward, knocking the victim officer to the ground before the vehicle appeared to run over the officer's legs.

The injured officer was transported to the hospital where it was determined that the officer's leg suffered a serious hematoma.

In a post-Miranda statement, the defendant initially provided a false name before acknowledging his true identity. The defendant admitted that he fled from police. The defendant admitted that he saw an officer, matching the description of the victim officer, standing next to his car when he was boxed in. The defendant stated that he continued to try and get away. The defendant claimed he was unaware that he struck the officer.

The defendant, who is from Iowa, is currently in custody.

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

Matthew Lund
Special Agent
1430 Maryland Avenue E
St. Paul, MN 55106
Badge: 1372

Electronically Signed:
07/17/2020 02:45 PM
Ramsey County, MN

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

Prosecuting Attorney

Dan Allard
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
07/17/2020 02:39 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: \$150,000.00

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 17, 2020.

Judicial Officer

Luis Bartolomei
District Court Judge

Electronically Signed: 07/17/2020 02:59 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.

SHI SHO

Defendant

*LAW ENFORCEMENT OFFICER RETURN OF SERVICE
I hereby Certify and Return that I have served a copy of this Order of
Detention upon the Defendant herein named.*

Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

Name: SHI SHO
DOB: 09/15/2001
Address: 4020 Hubbell, #211
Des Moines, IA 50317

Alias Names/DOB:

SID:

Height:

Weight:

Eye Color:

Hair Color:

Gender: MALE

Race: Asian

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: No

Driver's License #:

SILS Person ID #: 881867

SILS Tracking No. 3179532

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	7/16/2020	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2347		MNBCA0000	20200460
	Definition	7/16/2020	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A2347		MNBCA0000	20200460
	Penalty	7/16/2020	609.11.4 Minimum Sentences of Imprisonment-Use Dangerous Weapon	Felony	A2347		MNBCA0000	20200460
	Penalty	7/16/2020	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2347		MNBCA0000	20200460
2	Charge	7/16/2020	609.487.3 Fleeing a Peace Officer in a Motor Vehicle	Felony	E2700		MNBCA0000	20200460
	Penalty	7/16/2020	609.487.3 Fleeing a Peace Officer in a Motor Vehicle	Felony	E2700		MNBCA0000	20200460