

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 20A09702
Court File No. 27-CR-20-18441

State of Minnesota,
Plaintiff,

COMPLAINT
Order of Detention

vs.

CHRISTOPHER MALIK TODD DOB: 10/07/2000

1717 Thomas Ave N
Minneapolis, MN 55411

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 - Drive-by Shooting

Minnesota Statute: 609.19.1(2), with reference to: 609.17.4(2), 609.19.1

Maximum Sentence: HALF OF, 40 YEARS

Offense Level: Felony

Offense Date (on or about): 08/21/2020

Control #(ICR#): 20217812

Charge Description: That on or about August 21, 2020, in Hennepin County, Minnesota, Christopher Malik Todd, attempted to cause the death of victim, a human being, while Christopher Malik Todd committed or attempted to commit a drive-by shooting in violation of Minn. Stat. 609.66, Subd. 1e.

STATEMENT OF PROBABLE CAUSE

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

On Friday, August 21, 2020, at approximately 3:19 p.m., Minneapolis police were dispatched to a shots fired incident and motor vehicle chase that took place in St. Anthony, County of Hennepin. Police would later learn that an agent from the Minnesota Department of Corrections Fugitive Apprehension Unit ("victim") was conducting surveillance at a funeral, when occupants of a black Dodge Charger fired multiple rounds at the vehicle that the agents were using. Civilian witnesses at the scene also described a black charger driving recklessly around the cemetery and firing multiple shots at the agents' vehicle.

A vehicle pursuit ensued, with the Dodge Charger eventually crashing near the intersection of 39th Avenue East and Stinson Blvd. DOC agents indicated that the suspect Dodge Charger had been occupied by three males. One of the males was apprehended near the scene of the crash, and was identified as ZEONTAE EZEKIEL TODD, DOB 10/16/1996. ZEONTAE TODD made a spontaneous statement to the arresting offices that he was just lighting up a cigarette when he saw two "dudes" jump out of a car and start running. ZEONTAE TODD indicated that he jumped into the bushes, and watched one of the "dudes" remove a white jacket and throw it onto the ground. ZEONTAE TODD was adamant that he did not know anything about the shooting that had just taken place.

The driver of the Dodge Charger was apprehended running from the vehicle after a short foot chase. He was identified as MAURICE NMN JUNE, DOB 11/19/1988.

An MPD K-9 unit was called to assist in tracking the other suspect. One of them was described as a black male, approximately 180 pounds, with his hair in a bun. The K-9 tracked to a nearby apartment building, where officers observed a male matching this description sitting on a rear patio. This male was detained and identified as CHRISTOPHER MALIK TODD, DOB 10/07/2000, the brother of ZEONTAE TODD. CHRISTOPHER TODD was identified as the suspect who was riding in the front passenger seat of the Dodge Charger, and actually fired the handgun at the DOC agents.

Officers walked the path of the K-9 track and located a semi-automatic handgun with an extended magazine laying in the grass. The handgun appeared clean, as if it had been recently placed in this location and had a live round of ammunition in the chamber.

CHRISTOPHER TODD has been charged with a murder that took place on August 14, 2020 (See MNCIS No. 27-CR-20-18328). The black Dodge Charger referenced in this incident had been recently purchased by the victim of the August 14, 2020 murder.

While CHRISTOPHER TODD was seated in the rear of an MPD squad car, he uttered that he only ran from the vehicle because his cousin and everyone else did as well. He added that his cousin was involved in a high-speed chase, and that his cousin instructed TODD to run to his apartment building. These statements were not in response to any questioning by police.

In a post-Miranda, recorded interview, CHRISTOPHER TODD gave multiple versions of what had occurred. He did state that he was at the funeral when one of his "homies" began shooting at a Jeep. He identified this "homie" as MAURICE JUNE and gave an accurate physical description of JUNE. CHRISTOPHER TODD indicated that JUNE was using a .45 with a, "green beam," (lazer sight). TODD admitted that he had "touched," the .45 that he claimed JUNE used to shoot at the Jeep.

CHRISTOPHER TODD admitted that he is a member of the "Scarface" criminal street gang. He has a criminal history outside of the aforementioned pending murder charges. Additionally, on his person he possessed a cell phone that he admitted belonged to the victim of another recent homicide. That victim was a known member of the "Native Mob" criminal street gang.

In a post-Miranda, recorded interview, MAURICE JUNE stated that on Friday, August 21, 2020, he met up with CHRISTOPHER TODD and ZEONTAE TODD at a Holiday Gas Station. ZEONTAE TODD was driving the black Dodge Charger, and they told JUNE that the vehicle belonged to them. The three discussed attending the funeral in St. Anthony and decided to do so.

At the funeral, JUNE, the TODD brothers, and other individuals noticed the Jeep (that the victim was in) and discussed driving up to it. Individuals believed that the Jeep may contain members of a rival criminal street gang, and the Native Mob was specifically discussed.

At one point, MAURICE JUNE drove the Dodge Charger up close to the Jeep, and the Jeep began moving. Then, JUNE heard gunshots and looked at his front seat passenger, observing CHRISTOPHER TODD to be holding a handgun. JUNE indicated that ZEONTAE TODD was in the rear seat during the incident.

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

Justin Merten
Sergeant
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 4752

Electronically Signed:
08/25/2020 10:44 AM
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:
08/25/2020 10:31 AM

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); No Contact with Victim

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 25, 2020.

Judicial Officer

Luis Bartolomei
District Court Judge

Electronically Signed: 08/25/2020 10:48 AM

Sworn testimony has been given before the Judicial Officer by the following witnesses:

**COUNTY OF HENNEPIN
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Christopher Malik Todd

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: Christopher Malik Todd
DOB: 10/07/2000
Address: 1717 Thomas Ave N
Minneapolis, MN 55411

Alias Names/DOB: Christopher M Todd DOB: 10/7/2000
Christopher Todd DOB: 10/7/2000
Christopher Malik Todd DOB: 10/1/2000

SID: MN18A44283

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 #: 844862
SILS Tracking No. 3184246

Case Scheduling Information: Co-Defendants:
Maurice June
Zeontae Ezekiel Todd

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	8/21/2020	609.19.1(2) Murder - 2nd Degree - Drive-by Shooting	Felony	H2F13	A	MN0271100	20217812
	Penalty	8/21/2020	609.19.1 Murder - 2nd Degree	Felony	H2F13	A	MN0271100	20217812
	Penalty	8/21/2020	609.17.4(2) Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended	Felony	H2F13	A	MN0271100	20217812