

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 19A15687
Court File No. 27-CR-19-31316

State of Minnesota,
Plaintiff,

COMPLAINT
Order of Detention

vs.

JAMES TYJUAN MOORE DOB: 05/01/1998

3438 Morgan Ave N
Minneapolis, MN 55412

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 - With Intent-Not Premeditated

Minnesota Statute: 609.19.1(1), with reference to: 609.11.5(a), 609.19.1, 609.11.9

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 12/19/2019

Control #(ICR#): 19371533

Charge Description: That on or about 12/19/2019, in Hennepin County, Minnesota, James Tyjuan Moore, 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 December 19, 2019, Minneapolis police responded to a shooting on the 1700 block of Russell Avenue North. En route, police heard dispatch air that a caller also called to report gun shots at the corner of Golden Valley Road and Russell Avenue. The caller stated that he/she had seen two males firing a gun at a truck, and the truck and left south bound on Russell Avenue. The caller also stated that both males had run back into 2406 Golden Valley Road and into Apartment 104.

Police identified and contacted the 911 caller, hereinafter referred to as Witness 1. Officers verified with Witness 1 that no one had left Apartment 104 between when he/she observed the suspects enter and when police arrived.

Shortly after the shots fired call, at approximately 6:32 p.m., other officers who were responding to the shooting were directed to an SUV that had crashed into a tree in front of a residence on Russell Avenue North, a short distance from where Witness 1 observed the shooting. Further remarks indicated that there was one occupant, a subsequently identified male, ("victim,") in the vehicle with gunshot wounds to the back. Officers arrived and observed a white SUV that had struck a tree on the east side of Russell Avenue North.

The victim was laying across the center of the vehicle face down and blood rushing out of his mouth. The victim was removed from the vehicle, and officers began rendering aid. The victim had two gunshot wounds to his back. EMS personnel arrived and took over treatment of the victim. The victim would later be pronounced dead as a result of being shot in the back.

Back at 2406 Golden Valley Road, officers had "frozen" the premises, and obtained a search warrant for Apartment 104. Prior to executing the warrant, police cleared Apartment 104 of two females and two children.

Officers began to yell instructions for any other occupants of Apt 104 to come out and show their hands. After about 30 seconds, a male later identified at as TYREIK LAVEL PERKINS, DOB 3/20/1999, came out to the hallway and was detained.

After another short delay, a second male, identified as JAMES TYJUAN MOORE, DOB 5/01/1998, came to the door and was also detained.

During the execution of the search warrant, hidden in a couch, police located two handguns, a .22 and a 9mm, both semi-automatics. Inside a pair of blue jeans on the floor, police located a black wallet. The wallet contained a Wisconsin ID card in the name of TYREIK LAVEL PERKINS. Police located a gun magazine with live rounds on the floor of a bedroom closet, and a single live round on the closet floor approximately one foot away from the magazine.

Investigators subsequently interviewed Witness 1. Witness 1 told them he/she had observed the two male suspects walk out the front door at 2406 Golden Valley Road, then walk across Golden Valley Road towards Russell Avenue North. The suspects walked up to a white truck that was parked facing southbound on the east side of Russell Avenue.

Witness 1 described the first suspect as a dark-skinned black male, approximately 5'4" to 5'6" tall, wearing

a pink hoodie and red pants. (MOORE fits this description, and when police detained him at the apartment, he was wearing red pants. A pink jacket was later located inside the apartment). Witness 1 watched this suspect try to open the driver's door of the truck. This suspect pulled a gun out of his pocket and fired the gun two times at the driver's side of the truck. Witness 1 described the second suspect as standing behind the shooter when this happened.

Witness 1 indicated the second suspect was a heavy set, light-skinned black male, wearing a black jacket with the hood up. She also indicated he was slightly taller than the shooter. This fits the description of PERKINS, the only other male who was present with MOORE.

After the shots, the white truck drove off fast, southbound on Russell Avenue North. The suspects ran back to the apartment.

Witness 1 stated that the suspects returned to 2406 Golden Valley Road and entered the building through the back door. Once inside, Witness 1 heard the suspects enter Apartment #104, because he/she heard the door slam, and heard the suspects talking about what happened.

In a post-Miranda recorded interview, PERKINS admitted being at the apartment with MOORE on December 19, 2019. PERKINS indicated that MOORE lived there with his girlfriend. PERKINS claimed he and MOORE had been there for approximately two hours before the police arrived, and had not gone outside. PERKINS denied any knowledge of a shooting or any knowledge of the guns found in the apartment.

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

Chris Thomsen
Sergeant
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 7201

Electronically Signed:
12/20/2019 12:24 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:
12/20/2019 12:08 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: December 20, 2019.

Judicial Officer

Jay Quam
District Court Judge

Electronically Signed: 12/20/2019 01:45 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.

James Tyjuan Moore

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: James Tyjuan Moore
DOB: 05/01/1998
Address: 3438 Morgan Ave N
Minneapolis, MN 55412

Alias Names/DOB:

SID: MN15JA8156

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 #: 787608

SILS Tracking No. 3146805

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	12/19/2019	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2010		MN0271100	19371533
	Modifier	12/19/2019	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2010		MN0271100	19371533
	Penalty	12/19/2019	609.19.1 Murder - 2nd Degree	Felony	H2010		MN0271100	19371533
	Penalty	12/19/2019	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2010		MN0271100	19371533