

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No.  
Court File No.

20A12021  
27-CR-21-998

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**State of Minnesota,**

Plaintiff,

vs.

**THOMAS WILDER MOSELEY DOB: 08/23/1991**

2300 Nicollet Ave Apt 31  
Minneapolis, MN 55404

Defendant.

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**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: Drugs - 5th Degree - Possess Schedule 1,2,3,4 - Not Small Amount Marijuana**

Minnesota Statute: 152.025.2(1), with reference to: 609.11.5(a), 609.101.3, 152.025.4(b)

Maximum Sentence: 5 YEARS AND/OR \$3,000-\$10,000

Offense Level: Felony

Offense Date (on or about): 10/15/2020

Control #(ICR#): 20265423

Charge Description: That on or about 10/15/2020, in Hennepin County, Minnesota, Thomas Wilder Moseley, while possessing a firearm, unlawfully possessed one or more mixtures containing a Schedule I, II, III, or IV controlled substance, to-wit: cocaine.

Minimum Sentence: 3 YEARS

**COUNT II**

**Charge: Drugs - 5th Degree - Possess Schedule 1,2,3,4 - Not Small Amount Marijuana**

Minnesota Statute: 152.025.2(1), with reference to: 609.11.5(a), 609.101.3, 152.025.4(b)

Maximum Sentence: 5 YEARS AND/OR \$3,000-\$10,000

Offense Level: Felony

Offense Date (on or about): 10/15/2020

Control #(ICR#): 20265423

Charge Description: That on or about 10/15/2020, in Hennepin County, Minnesota, Thomas Wilder Moseley, while possessing a firearm, unlawfully possessed one or more mixtures containing a Schedule I, II, III, or IV controlled substance, to-wit: psilocyn.

Minimum Sentence: 3 YEARS

**COUNT III**

**Charge: Drugs - 5th Degree - Possess Schedule 1,2,3,4 - Not Small Amount Marijuana**

Minnesota Statute: 152.025.2(1), with reference to: 609.11.5(a), 609.101.3, 152.025.4(b)

Maximum Sentence: 5 YEARS AND/OR \$3,000-\$10,000

Offense Level: Felony

Offense Date (on or about): 10/15/2020

Control #(ICR#): 20265423

Charge Description: That on or about 10/15/2020, in Hennepin County, Minnesota, Thomas Wilder Moseley, while possessing a firearm, unlawfully possessed one or more mixtures containing a Schedule I, II, III, or IV controlled substance, to-wit: marijuana.

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 October 15, 2020, law enforcement personnel located THOMAS WILDER MOSELEY, "the Defendant," on the Public Service Level of the Hennepin County Government Center. The Defendant was present as part of a group protesting during a court appearance for the former Minneapolis Police officers involved in the death of George Floyd. Law enforcement was aware that the Defendant had a probable cause pick-up out for causing damage to the Minneapolis Police Department Fifth Precinct building on August 15th. The Defendant has since been charged with felony Criminal Damage to Property (see 27CR2022304) for that conduct. When arrested in the Government Center on October 15th, the Defendant was carrying a loaded Glock handgun in his waistband resulting in an additional charge of Possessing a Dangerous Weapon in a Courthouse (see 27CR2022184).

Following this arrest, officers located the Defendant's pickup truck in the area of 7th Street and 2nd Avenue, City of Minneapolis, County of Hennepin, State of Minnesota, two blocks from the Government Center. Officers noted the odor of marijuana coming from the vehicle and observed two red plastic gas containers in the bed of the truck. Officers also saw a black handgun case on the floor behind the front passenger seat. The vehicle was towed to the Minneapolis Impound Lot where a search warrant was executed on the truck.

A search of the truck revealed the following items:

- Taurus .38 special revolver, including ammunition
- Kel-Tec 9mm semi-auto pistol
- Ruger AR 5.556 rifle, including five magazines and 166 rounds of ammunition
- Savage Arms 775 shotgun, including 12-gauge shotgun shells
- Smith and Wesson 9mm handgun with loaded magazine and an additional three loaded magazines
- Speed loader for a revolver
- Two loaded Glock magazines
- Loaded 30 round extended magazine
- Bag of mushrooms, which was later tested by the Minnesota Bureau of Criminal Apprehension and found to be positive for the presence of psilocyn. The weight of the mushrooms was found to be 2.456 grams. This report was issued by the BCA on 1/10/2021.
- Glass jar containing a white powder, which was later tested by the BCA and found to be positive for cocaine and weighing 0.393 gram. This report was issued by the BCA on 1/10/2021.
- Suspected marijuana, a sample of which field tested positive for THC and weighed approximately 150 grams in total.
- Hatchet
- Crowbar
- Black bandana
- Tac pellets
- Gas mask
- Spray paint can
- Bulletproof vest ballistic panel
- Bullhorn

Officers also executed a search warrant at the Defendant's then residence in Anoka County and found a box for a Kel-Tec 9mm, a box for a Taurus .38 special, a box for a Smith and Wesson 9mm handgun, and a

box for a Ruger 5.56 rifle. An additional Remington rifle with scope and marijuana was recovered during that search as well.

Your Complainant requests an arrest warrant in this matter. The Defendant is presently out on unconditional bail. In the two previously mentioned cases, the Defendant was able to secure unconditional release after the Minnesota Freedom Fund posted \$5,000 cash in addition to a bond that had been previously secured. In a third now-pending case, the Defendant was then charged with Riot in the Second Degree from an event that occurred on December 31, 2020 (see 27CR21121). In that case, the court ordered bail of \$60,000 without conditional release or \$30,000 conditional release. Again, the Minnesota Freedom Fund secured the Defendant's unconditional release from custody after posting \$60,000. After that release, law enforcement was notified that the Defendant, with the assistance of two separate straw buyers, was suspected of attempting to buy a semi-automatic gun from a store in Anoka County on January 7th and January 12th. These incidents remain under investigation. The Defendant's persistent efforts to acquire firearms and continued engagement in criminal conduct especially dangerous to others raises significant concerns for public safety.

## 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**

Lindsey Marie Kortus  
Police Officer  
350 S 5th St  
Minneapolis, MN 55415-1389  
Badge: 3790

Electronically Signed:  
01/15/2021 10:16 AM  
Hennepin County, Minnesota

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

**Prosecuting Attorney**

Mike Radmer  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
01/15/2021 08:32 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 as directed in the Notice of Hearing before the above-named court 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: \$250,000.00  
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: January 15, 2021.

**Judicial Officer**                      Luis Bartolomei                      Electronically Signed: 01/15/2021 10:47 AM  
District Court Judge

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

**COUNTY OF HENNEPIN  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**Thomas Wilder Moseley**

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:** Thomas Wilder Moseley  
**DOB:** 08/23/1991  
**Address:** 2300 Nicollet Ave Apt 31  
Minneapolis, MN 55404

**Alias Names/DOB:**

**SID:**

**Height:**

**Weight:**

**Eye Color:**

**Hair Color:**

**Gender:** MALE

**Race:** Unknown

**Fingerprints Required per Statute:** Yes

**Fingerprint match to Criminal History Record:** No

**Driver's License #:**

**SILS Person ID #:** 884994

**SILS Tracking No.** 3198131

**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	10/15/2020	152.025.2(1) Drugs - 5th Degree - Possess Schedule 1,2,3,4 - Not Small Amount Marijuana	Felony	DH552		MN0271100	20265423
	Penalty	10/15/2020	152.025.4(b) Drugs - 5th Degree Controlled Substance - Sale or possession	Felony	DH552		MN0271100	20265423
	Definition	10/15/2020	609.101.3 Minimum Fines-Controlled Substance Offenses	No-Level	DH552		MN0271100	20265423
	Penalty	10/15/2020	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	DH552		MN0271100	20265423
2	Charge	10/15/2020	152.025.2(1) Drugs - 5th Degree - Possess Schedule 1,2,3,4 - Not Small Amount Marijuana	Felony	DH562		MN0271100	20265423
	Penalty	10/15/2020	152.025.4(b) Drugs - 5th Degree Controlled Substance - Sale or possession	Felony	DH562		MN0271100	20265423
	Definition	10/15/2020	609.101.3 Minimum Fines-Controlled Substance Offenses	No-Level	DH562		MN0271100	20265423
	Penalty	10/15/2020	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	DH562		MN0271100	20265423
3	Charge	10/15/2020	152.025.2(1) Drugs - 5th Degree - Possess Schedule 1,2,3,4 - Not Small Amount Marijuana	Felony	DH542		MN0271100	20265423
	Penalty	10/15/2020	152.025.4(b) Drugs - 5th Degree Controlled Substance - Sale or possession	Felony	DH542		MN0271100	20265423
	Definition	10/15/2020	609.101.3 Minimum Fines-Controlled Substance Offenses	No-Level	DH542		MN0271100	20265423
	Penalty	10/15/2020	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	DH542		MN0271100	20265423