

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 21A00798
Court File No. 27-CR-21-1605

State of Minnesota,

Plaintiff,

vs.

ANGELIQUE LESLIE SIMONS DOB: 01/10/1974

2007 Queen Ave N
Minneapolis, MN 55411

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: Murder - 2nd Degree - With Intent-Not Premeditated

Minnesota Statute: 609.19.1(1), with reference to: 609.11.4, 609.19.1, 609.11.9

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 01/22/2021

Control #(ICR#): 21014886

Charge Description: That on or about January 22, 2021, in Hennepin County, Minnesota, ANGELIQUE LESLIE SIMONS, 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 dangerous weapon.

Minimum Sentence: 1 YEAR AND 1 DAY

COUNT II

Charge: Murder - 2nd Degree - Without Intent - While Committing a Felony

Minnesota Statute: 609.19.2(1), with reference to: 609.19.2(1), 609.11.4, 609.11.9

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 01/22/2021

Control #(ICR#): 21014886

Charge Description: That on or about January 22, 2021, in Hennepin County, Minnesota, ANGELIQUE LESLIE SIMONS, did without intent to effect the death of any person, cause the death of Victim, a human being, while committing or attempting to commit the felony offense of Assault 2 while using a dangerous weapon.

Minimum Sentence: 1 YEAR AND 1 DAY

STATEMENT OF PROBABLE CAUSE

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

On or about January 22, 2021, at approximately 3:57 a.m., officers from the Minneapolis Police Department responded to a residence located on Queen Avenue North, in Minneapolis, Hennepin County, State of Minnesota, on a report of a stabbing.

Upon arrival, officers located a male identified as J.M.P. (DOB: 5/31/1980), Victim herein, laying in the kitchen area of the home with an apparent stab wound to the chest. Officers attempted to provide medical assistance to Victim. Victim was transported by ambulance to North Memorial Hospital but was pronounced deceased from his injury.

Officers spoke to witnesses and learned that ANGELIQUE LESLIE SIMONS (DOB: 1/10/1974), Defendant herein, had been at the residence. Officers learned through witness(es) that Defendant had called Victim and directed him to the residence where the two had a dispute over money (\$60) that Defendant claimed Victim owed her. Defendant was reportedly angry and demanded Victim to pay her the money he owed, or her son would "f*ck him up." Defendant then told Victim she would do it herself and pulled out a knife and stabbed Victim one time in the chest saying something like "you're gonna f*cking pay me now!" Victim reportedly started to spray blood and Defendant started to blame Victim for "walking into it." Officers further learned from a witness that Defendant and others in the home then left, taking the knife (which had been placed in a McDonald's bag) with them. Officers learned that Defendant deals heroin out of the residence and gets mad about her money, her dope and people stealing from her.

Officers searched for the knife in and around the residence but were unable to locate the knife.

Officers learned from another witness that the witness had dropped Defendant off at the residence on Queen Avenue on 1/21/21 and was going to pick her up later but because Defendant took so long, the witness left her there. The witness reported that she picked up Defendant on 1/22/21 at a gas station and Defendant was acting paranoid. When Defendant was asked why she was acting that way, Defendant told witness that Defendant had stabbed someone at "Queen" because he owed her money. Defendant then received a call from someone and learned the stabbing victim had died. Defendant asked the caller if they said who did it and was told they did not. Defendant then asked witness what Defendant should do.

Defendant was later arrested. After being read her rights, she was asked what she had been doing at the residence on the night of the stabbing. Defendant admitted that "I always go up to Queen." Defendant denied dealing heroin or getting into an altercation with Victim. When advised that officers had been told about Defendant admitting to stabbing Victim, Defendant responded by saying that that did not mean anything, and the person could be lying. Defendant then declined to speak further with officers.

Defendant is 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

Mark Suchta
Sergeant
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 6995

Electronically Signed:
01/25/2021 10:53 AM
Hennepin County, Minnesota

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

Prosecuting Attorney

Tara C. Ferguson Lopez
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
01/25/2021 10:35 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: \$1,000,000.00

Conditions of Release: No use of drugs/alcohol; Random UAs; No Possession of Weapons; Make All Appearances; Remain Law Abiding; No Contact with Witnesses

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 25, 2021.

Judicial Officer

Luis Bartolomei
District Court Judge

Electronically Signed: 01/25/2021 11:02 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.

ANGELIQUE LESLIE SIMONS

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: ANGELIQUE LESLIE SIMONS
DOB: 01/10/1974
Address: 2007 Queen Ave N
Minneapolis, MN 55411

Alias Names/DOB:

SID: MN97000675

Height:

Weight:

Eye Color:

Hair Color:

Gender: FEMALE

Race: American Indian

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: Yes

Driver's License #:

SILS Person ID #: 276335

SILS Tracking No. 3211766

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	1/22/2021	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2032		MN0271100	21014886
	Modifier	1/22/2021	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2032		MN0271100	21014886
	Penalty	1/22/2021	609.19.1 Murder - 2nd Degree	Felony	H2032		MN0271100	21014886
	Penalty	1/22/2021	609.11.4 Minimum Sentences of Imprisonment-Use Dangerous Weapon	Felony	H2032		MN0271100	21014886
2	Charge	1/22/2021	609.19.2(1) Murder - 2nd Degree - Without Intent - While Committing a Felony	Felony	H2832		MN0271100	21014886
	Modifier	1/22/2021	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2832		MN0271100	21014886
	Penalty	1/22/2021	609.11.4 Minimum Sentences of Imprisonment-Use Dangerous Weapon	Felony	H2832		MN0271100	21014886
	Penalty	1/22/2021	609.19.2(1) Murder - 2nd Degree - Without Intent - While Committing a Felony	Felony	H2832		MN0271100	21014886