

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 21A07806  
Court File No. 27-CR-21-14209

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**State of Minnesota,**

Plaintiff,

vs.

**KEJUAN ANGELO HAYWOOD DOB: 11/11/2002**

4046 Lyndale Ave N Apt 203  
Minneapolis, MN 55412

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

Minnesota Statute: 609.19.1(1), with reference to: 609.11.5(a), 609.05.1, 609.05.2, 609.19.1, 609.11.9

Maximum Sentence:

Offense Level: Felony

Offense Date (on or about): 09/14/2020

Control #(ICR#): 20238443

Charge Description: That on or about 9/14/2020, in Minneapolis, Hennepin County, Minnesota, Kejuan Angelo Haywood, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another, or otherwise procures the other to commit the crime, caused the death of Victim 1, a 17-year-old known juvenile male, a human being, with intent to effect the death of that person or another, but without premeditation, and while using a firearm.

**COUNT II**

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

Minnesota Statute: 609.19.1(1), with reference to: 609.11.5(a), 609.17.4(2), 609.05.1, 609.05.2, 609.19.1, 609.11.9

Maximum Sentence:

Offense Level: Felony

Offense Date (on or about): 09/14/2020

Control #(ICR#): 20238443

Charge Description: That on or about 9/14/2020, in Minneapolis, Hennepin County, Minnesota, Kejuan Angelo Haywood, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another, or otherwise procures the other to commit the crime, attempted to cause the death of Victim 2, a 19-year-old known adult male, a human being, with intent to effect the death of that person or another, but

without premeditation, while using a firearm.

## STATEMENT OF PROBABLE CAUSE

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

On 9/14/2020, at about 4:30 p.m., the Minneapolis Police Department received reports of shots fired at a gas station located on Fremont Avenue North and Dowling Avenue North, located in Minneapolis, Hennepin County, Minnesota. When officers arrived, they observed two victims who had been struck by gunfire. Both victims were rushed to the hospital. Victim 1, a 17-year-old known juvenile male, was pronounced dead by medical staff at 5:09 p.m. He had been shot three times: once into the left cheek and outside the right eye, once into the chest, near the heart, and once in the arm. Victim 2, a 19-year-old known adult male, had a through-and-through gunshot injury on the right side of his torso.

The investigation into this incident identified the two shooters as J.T.L. and Kejuan Angelo Haywood ("Defendant" herein). Also involved was Known-Juvenile-Male-A, who was the driver of the car used in the murder. Both J.T.L. and Known-Juvenile-Male-A identified Defendant as one of the shooters in this murder.

Video surveillance from the gas station shows the victims standing outside the building talking with other individuals. The two shooters arrive in a red sedan, which is seen on traffic video pulling into the alley behind the store. The shooters are seen on video, approaching from the rear of the store, walking on a sidewalk with a row of bushes blocking them from view of the people standing outside the gas station. J.T.L. and Defendant's height and build are consistent with that of the shooters as seen in the video. Of the two shooters, J.T.L. is taller and has a skinnier build. Defendant is shorter and has a stockier build. As they approach the victims, as soon as they pass the row of bushes, J.T.L. raises his gun and fires multiple rounds at the group of people. Defendant fires second, while one victim is on the ground and other victims are running away. J.T.L. and Defendant then run back the way they came – down the sidewalk and into the alley behind the gas station. The car they arrived in is then seen leaving the area at a high rate of speed.

Through a license plate reader, investigators were able to identify the car which J.T.L. and Defendant used to flee the scene as registered to a parent of Known-Juvenile-Male-A.

In a post-Miranda statement, Known-Juvenile-Male-A gave a detailed account of what happened that day. He indicated that while he was driving around, he saw J.T.L. and picked him up. He said that Defendant called him and that he then went and picked him up. Cell phone records show Defendant calling Known-Juvenile-Male-A shortly before the murder. Known-Juvenile-Male-A says that after the murder he dropped Defendant off at his home. Cell phone records also show Known-Juvenile-Male-A's phone in the area of Defendant's house just after the murder. Known-Juvenile-Male-A also detailed his travel in the minutes and hours after the murder, and again cell phone data substantiates his statements. Known-Juvenile-Male-A's cell phone also shows more than 10 contacts (text, call, and data) between Defendant and himself on the day of the murder. There are no cell-phone contacts between Known-Juvenile-Male-A's cell phone and Defendant's cellphone during the time of the murder and the time when Known-Juvenile-Male-A said they were together.

In a post-Miranda statement, J.T.L. admitted that he was involved in the shooting. He also identified Defendant as the other shooter. When J.T.L. was apprehended, he threw a gun out of a car as he fled from police. Ballistics on that gun show a match with seven discharged cartridge casings recovered from the scene of the murder.

ON JULY 29, 2021, DEFENDANT WAS ORDERED TO STAND TRIAL AS AN ADULT AFTER PROCEEDINGS IN FRONT OF THE HONORABLE JEANNICE M. REDING.



## 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**

Scott A Olson  
Sergeant  
350 S 5th St  
Minneapolis, MN 55415-1389  
Badge: 5315

Electronically Signed:  
07/30/2021 10:06 AM  
Hennepin County, Minnesota

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

**Prosecuting Attorney**

Morgan D Kunz  
Senior Assistant Hennepin  
County Attorney  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
07/30/2021 09:43 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:

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 30, 2021.

**Judicial Officer**

Luis Bartolomei  
District Court Judge

Electronically Signed: 07/30/2021 10:53 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.

**Kejuan Angelo Haywood**

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:** Kejuan Angelo Haywood  
**DOB:** 11/11/2002  
**Address:** 4046 Lyndale Ave N Apt 203  
Minneapolis, MN 55412

**Alias Names/DOB:** KEJUAN A HAYWOOD DOB: 11/11/2002  
**SID:**  
**Height:**  
**Weight:**  
**Eye Color:**  
**Hair Color:**  
**Gender:** MALE  
**Race:** Black  
**Fingerprints Required per Statute:** Yes  
**Fingerprint match to Criminal History Record:** No  
**Driver's License #:**  
**SILS Person ID #:** 848476  
**SILS Tracking No.** 3237615  
**Case Scheduling Information:** Warrant. Court today at 1:30pm.  
**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	9/14/2020	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2016	X	MN0271100	20238443
	Penalty	9/14/2020	609.19.1 Murder - 2nd Degree	Felony	H2016	X	MN0271100	20238443
	Modifier	9/14/2020	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2016	X	MN0271100	20238443
	Modifier	9/14/2020	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	H2016	X	MN0271100	20238443
	Penalty	9/14/2020	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2016	X	MN0271100	20238443
	Modifier	9/14/2020	609.05.1 Liability for Crimes of Another-Intentional	No-Level	H2016	X	MN0271100	20238443
2	Charge	9/14/2020	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2013	A	MN0271100	20238443
	Modifier	9/14/2020	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	H2013	A	MN0271100	20238443
	Penalty	9/14/2020	609.19.1 Murder - 2nd Degree	Felony	H2013	A	MN0271100	20238443
	Modifier	9/14/2020	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2013	A	MN0271100	20238443
	Penalty	9/14/2020	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2013	A	MN0271100	20238443
	Penalty	9/14/2020	609.17.4(2) Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended	Felony	H2013	A	MN0271100	20238443
	Modifier	9/14/2020	609.05.1 Liability for Crimes of Another-Intentional	No-Level	H2013	A	MN0271100	20238443