

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 20A12556
Court File No. 27-CR-20-23120

State of Minnesota,
Plaintiff,

COMPLAINT
Warrant

vs.

JOMOY TREMAYNE LEE DOB: 12/07/2002

1519 Girard 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 - 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, Jomoy Tremayne Lee, 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, 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. Eleven discharged cartridge casings were recovered from the scene and forensics determined that one weapon fired 7 rounds and the other weapon fired 4 rounds.

The investigation into this incident identified one of the two shooters as Jomoy Tremayne Lee (“Defendant” herein). In a post-Miranda statement, Defendant admitted that he was involved in the shooting. He admitted that he was there when the murder happened, that he fired his gun, and he was able to describe the guns that were used in the murder. When Defendant 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. A bullet fired from that gun resulted in the death of Victim.

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. Defendant’s height and build is consistent with that of the first shooter as seen in the video. As he approaches the Victims, as soon as he passes the row of bushes, Defendant raises his gun and fires multiple rounds at the group of people. One of the victim’s immediately falls to the ground and a medical examination would later determine he was shot in the head. The second shooter also fired his weapon. Defendant and the second shooter 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. Police were able to track the vehicle used during the murder and after the murder the car drives to the area of Defendant’s home.

ON OCTOBER 28, 2020, DEFENDANT WAIVED CERTIFICATION PROCEEDINGS IN FRONT OF THE HONORABLE FRANCIS J. MAGILL AND WAS THEREAFTER ORDERED TO STAND TRIAL AS AN ADULT.

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:
10/29/2020 04:21 PM
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:
10/29/2020 03:45 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:

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: October 29, 2020.

Judicial Officer

Luis Bartolomei
District Court Judge

Electronically Signed: 10/29/2020 04:46 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.

Jomoy Tremayne Lee

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: Jomoy Tremayne Lee
DOB: 12/07/2002
Address: 1519 Girard Ave N
Minneapolis, MN 55411

Alias Names/DOB:
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 #: 847061
SILS Tracking No. 3199781
Case Scheduling Information: First Appearance Oct 30, 2020, 1:30 PSF
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