

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 21A08685
Court File No. 27-CR-21-15679

State of Minnesota,

Plaintiff,

vs.

JAMAL L SMITH DOB: 01/25/1988

10552 S Normal Ave
Chicago, IL 60628

Defendant.

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: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 07/06/2021

Control #(ICR#): 21024312

Charge Description: That on or about 7/6/2021, in Plymouth, Hennepin County, Minnesota, Jamal L Smith,

acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another or otherwise procuring the other to commit the crime, 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

COUNT II

Charge: Aiding an Offender - Accomplice After the Fact

Minnesota Statute: 609.495.3, with reference to: 609.495.3

Maximum Sentence: 20 YEARS

Offense Level: Felony

Offense Date (on or about): 07/06/2021

Control #(ICR#): 21024312

Charge Description: That on or about 7/6/2021, in Plymouth, Hennepin County, Minnesota, Jamal L Smith aided another person who Jamal L Smith knew or had reason to know had committed a criminal act, by destroying or concealing evidence of that crime and/or obstructing the investigation or prosecution of that crime.

STATEMENT OF PROBABLE CAUSE

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

On July 6, 2021, Plymouth Police Officers and paramedics were dispatched to the area of Highway 169 and Rockford Road in Plymouth, Hennepin County, Minnesota, on a motor vehicle crash. Upon arrival, paramedics observed that the driver, hereinafter referred to as Victim, a known adult male, who suffered a gunshot wound to the head. Victim was transported to the hospital where it was determined that he was deceased.

Initial information revealed that Victim's teenage child, Witness A, was in the front passenger seat at the time of the shooting and subsequent crash. Further information showed that the shooting stemmed from a brief altercation between Victim and another vehicle on Highway 169. Witness A reported that there was a vehicle in the next lane that started moving toward them. Witness A indicated that Victim gestured to the other vehicle and that the suspect vehicle was next to their vehicle for about ten seconds before he heard a loud noise and saw that the driver's side window was shattered and had a small hole. Their vehicle then went off the road and crashed. Witness A observed that Victim was injured and bleeding and he called 911. Witness A did not observe the shooter.

Officers obtained MNDOT surveillance video of 169 and observed a silver SUV that had been traveling in the left lane directly next to Victim's vehicle just prior to Victim being shot. The suspect vehicle had its right turn signal on and was traveling at the same speed as Victim's vehicle in the area of the shooting. Officers traced the suspect vehicle back and observed it driving erratically and at a high rate of speed prior to it encountering Victim's vehicle. The suspect vehicle accelerated and paralleled Victim's vehicle and matched its speed for approximately .5 miles. After the shooting, the suspect vehicle continued to travel southbound at a high rate of speed and is believed to have exited from Hwy 169 onto Shelard Parkway as it was not observed on traffic cameras south of Hwy 55.

Officers were able to track the suspect vehicle back to the Blue Pearl Animal Hospital, located at Grey Fox Road and Snelling Avenue, approximately one minute prior to the vehicle being captured on MNDOT surveillance cameras at Snelling and I-694. Investigators reviewed all surveillance from Blue Pearl Animal Hospital and were able to determine the vehicle was a 2015-2020 Chevrolet Suburban LT with a moon roof and roof rack package. Officers were also able to determine that the driver at the time just before the shooting was wearing a white shirt with a strap across his chest.

On July 23rd, Plymouth Police received a tip from a towing company that had a vehicle in their impound they believed to be the suspect vehicle after employees saw a media release of the surveillance footage. The vehicle was a 2019 Chevrolet Suburban LT with Colorado license plate ABYV61. The vehicle was impounded and processed for evidence related to this investigation.

Investigation revealed that the recovered suspect vehicle was rented by Witness B in April of 2021 and had recently been reported stolen by the rental car company due to not being returned. Using a records database, investigators were able to determine a residence for Witness B which is on the 200 block of Shelard Parkway. Additional information from commercial license plate reader data showed the vehicle was parked in the parking lot of the Shelard Parkway address on July 9, 2021. This location is approximately .5 miles away from where the suspect vehicle was last seen on traffic cameras.

As part of the investigation, officers reviewed surveillance video for a gas station near Witness B's residence. Officers observed the suspect vehicle on that video. In one instance, a male was observed with

individuals known to be related to Witness B. The male was wearing a handbag with a strap going across his chest driving the suspect vehicle.

As noted above, the suspect vehicle was seized and searched. During the search, officers located a work ID as well as prescription paperwork for "Jamal Smith". Officers reviewed a public Facebook account for Witness B and located a "friend" with the name "Jamal Smith". Additional investigation revealed this account belongs to JAMAL L SMITH, Defendant herein.

The defendant also had a publicly available Facebook page. In reviewing the page, officers observed that a Facebook Live Video was posted on July 6, 2021, at 3:17 p.m. The video shows the defendant, who appeared to Complainant to be the same male from the gas station surveillance video, sitting in the passenger seat wearing a white shirt and similar handbag, with similar strap. In the video, the defendant is seen in the front passenger seat brandishing a semi-automatic handgun with an extended magazine. Upon enhancing an image from the video, investigators were able to obtain a serial number from the handgun. In comparing the image with other known images of handguns, it was believed that the handgun was most likely a Springfield XD.

Investigators contacted Springfield Armory and it was learned that the serial number was issued to a .45 caliber Springfield XD, manufactured in November of 2006. During the investigation a bullet was recovered from Victim's vehicle. This bullet was given to the BCA who subsequently identified it as a .45 caliber.

During the investigation, Officers were contacted by a person known to Witness B, hereinafter referred to as Witness C. Witness C reported that she knows the defendant and observed him with Witness B the day after the shooting. Witness C reported that the defendant was in possession of a handgun with an extended magazine that day.

Officers then met with Witness B who was in a romantic relationship with the defendant. Witness B stated that she became suspicious that her boyfriend, the defendant, was involved in this homicide after being sent a news clip on Facebook describing details. Witness B reported that the defendant told her he ditched the vehicle and was picked up by someone else prior to leaving town. Witness B stated this was suspicious as the defendant always drove the suspect vehicle. Witness B stated that she has confronted the defendant about his involvement in the crime and he will only state "the police don't have any evidence." Witness B reported that the defendant tried to talk her into going to Chicago after the news story was broadcast to avoid "people that will be coming to talk to you," referring to police.

Officers executed a search warrant at Witness B's residence where they located among the defendant's belongings, a satchel identical to the one worn by the defendant in numerous surveillance videos, a pistol holder, and a work ID for the defendant.

Two other individuals were observed in the Facebook Live. Those individuals were identified by law enforcement and investigation into their role in the shooting continues.

The defendant is not in custody. Law enforcement has credible information that shows the defendant is currently in Chicago. The defendant has prior violent convictions. The State requests a warrant issue for the defendant's arrest.

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

Det. Michael Passig
Detective
3400 Plymouth Blvd
Plymouth, MN 55447-1482
Badge: 94

Electronically Signed:
08/20/2021 04:20 PM
Hennepin County, Minnesota

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

Prosecuting Attorney

Dan Allard
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
08/20/2021 04:13 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 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: \$2,000,000.00
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: August 20, 2021.

Judicial Officer

Luis Bartolomei
District Court Judge

Electronically Signed: 08/20/2021 04:22 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.

Jamal L Smith

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: Jamal L Smith
DOB: 01/25/1988
Address: 10552 S Normal Ave
Chicago, IL 60628

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 #: 896067

SILS Tracking No. 3240693

Case Scheduling Information: This complaint should be filed under seal. An order to seal has been signed and sent to the CCU. Order to Seal is in process.

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	7/6/2021	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2013	X	MN0271700	21024312
	Penalty	7/6/2021	609.19.1 Murder - 2nd Degree	Felony	H2013	X	MN0271700	21024312
	Modifier	7/6/2021	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2013	X	MN0271700	21024312
	Modifier	7/6/2021	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	H2013	X	MN0271700	21024312
	Penalty	7/6/2021	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2013	X	MN0271700	21024312
	Modifier	7/6/2021	609.05.1 Liability for Crimes of Another-Intentional	No-Level	H2013	X	MN0271700	21024312
2	Charge	7/6/2021	609.495.3 Aiding an Offender - Accomplice After the Fact	Felony	E1B20		MN0271700	21024312
	Penalty	7/6/2021	609.495.3 Aiding an Offender - Accomplice After the Fact	Felony	E1B20		MN0271700	21024312