

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 21A11589
Court File No. 27-CR-21-20794

State of Minnesota,

Plaintiff,

vs.

TOMASA LESHAE MARTINEZ DOB: 07/14/1991

3200 4th Ave S
Minneapolis, MN 55408

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: Kidnapping-Confine/Remove Any Person-No Consent

Minnesota Statute: 609.25.1, with reference to: 609.05.1, 609.05.2

Maximum Sentence: imprisonment for not more than 40 years or to payment of a fine of not more than \$50,000, or both.

Offense Level: Felony

Offense Date (on or about): 03/27/2021

Control #(ICR#): 21069862

Charge Description: That on or about March 27, 2021 to March 29, 2021, in Minneapolis in Hennepin County, Minnesota, TOMASO LESHAE MARTINEZ, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another removed victim M.M. from one place to another without his consent, in order to facilitate commission of any felony or flight thereafter or to commit great bodily harm or to terrorize the victim or another.

STATEMENT OF PROBABLE CAUSE

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

On April 4, 2021, family members of victim M.M. walked into the Minneapolis Police Department Fifth Precinct to report that he was missing. According to his family, M.M. was last seen at approximately 6:00 p.m. on March 27, 2021. The family had been told by people at a homeless camp that M.M. had gotten into a fight with another male and was hit over the head with a shovel, killing him.

On April 26, 2021, M.M.'s body was found in a farming culvert in Dakota County. M.M.'s hands were bound behind his back and a nail was observed in the back heel of one of his feet.

Subsequent investigation showed that on March 29, 2021 at approximately 8:28 p.m. a cell phone owned by Ivan Contreras-Sanchez had been in the immediate area of the culvert where M.M.'s body was found. The cell phone information also showed the cell phone at the Speedway gas station in Inver Grove Heights at approximately 7:36 p.m. that same day. Investigators reviewed video from the Speedway and observed two vehicles arriving at the gas station together, a light colored Honda CRV and a black Chevrolet Malibu Maxx. Court records show that Contreras-Sanchez was cited for driving without a license in February of 2021 in a dark colored Chevrolet Maxx. Officers located and towed a black Chevrolet Malibu Maxx from the rear of 3214 Irving Avenue North in Minneapolis. At the time, Contreras-Sanchez was also present and had gutted the interior of the vehicle. Contreras-Sanchez was taken into custody on November 2, 2021, and in a post-Miranda, taped statement he admitted that he was present at 425 36th Street in Minneapolis, Hennepin County, Minnesota, with victim M.M. and observed several people beating victim M.M. Contreras-Sanchez identified one of the males who were beating M.M. as ARTURO MORALES-CERAS (defendant Morales-Ceras hereinafter). There were also several others present at the residence, including Morales-Ceras' girlfriend, TOMASO LESHAE MARTINEZ, Defendant "Martinez" herein.

On November 5, 2021, Defendant Martinez and Defendant Morales-Ceras were both located and taken into custody. In a post-Miranda, taped statement, Defendant Morales-Ceras admitted to investigators that he went to a tent encampment at 5th Avenue South and Lake Street in Minneapolis with Ivan Contreras-Sanchez and that they located victim M.M. there. Contreras-Sanchez then forced victim M.M. into his black Chevrolet Malibu Maxx at gunpoint. Defendant Morales-Ceras suggested taking victim M.M. to the residence at 425 36th Street in Minneapolis. When they arrived, victim M.M. was taken into the basement. Both Defendant Morales-Ceras and Contreras-Sanchez were present in the basement along with several other people. Defendant Morales-Ceras admitted that he kicked victim M.M. and stated that everyone in the basement kicked and hit victim M.M. at the direction of Contreras-Sanchez. Defendant Morales-Ceras admitted that while in the basement he used a hammer to pound a roofing nail into the bone of victim M.M.'s foot/heel. Victim M.M. was then taken to the main floor of the residence where Defendant Morales-Ceras and Contreras-Sanchez interrogated him about working with the police and being a snitch. While this was happening, Defendant Morales-Ceras was holding a hammer and using it to intimidate victim M.M. Victim M.M. was then moved to the second floor of the residence and Defendant Morales-Ceras admitted that after some time he and Defendant Martinez brought him out of the house. According to Defendant Morales-Ceras, victim M.M. was in very bad shape and had a hard time walking, but he was still alive. Victim M.M. was wrapped in plastic and placed in the way back hatch area of the Malibu Maxx. Defendant Morales-Ceras, Contreras-Sanchez and Defendant Martinez all got in the vehicle and drove south. Defendant Martinez was driving. At some point while they were driving, Contreras-Sanchez, who was in the back seat, told them that victim M.M. had died.

Defendant Morales-Ceras told investigators that they then met up with another vehicle. The occupants of

that vehicle were “Miestro” and “old man Victor” (Victor Manuel Gurrero). At that point, there were two vehicles, the Malibu Maxx and a silver Honda CRV. They then drove around looking for a place where there was water and talked about finding a place to dump victim M.M.’s body.

During the course of this investigation, officers were provided three videos by Contreras-Sanchez. In one video an unknown person can be seen with their arm wrapped around victim M.M.’s neck. The person is identified by Contreras-Sanchez as Defendant Morales-Ceras. In another video, a male in a sweatshirt comes into camera view and waives a hammer at victim M.M. That male is also identified as Defendant Morales-Ceras.

Defendant Martinez can be seen in one video sitting by looking at her cell phone while victim M.M. is beaten and tortured. She did not call 911 or make any effort to intervene. Defendant Martinez later drives the vehicle that victim M.M. was put into while he was still alive.

An autopsy was performed on M.M.’s body at the Hennepin County Medical Examiner’s Office. According to their findings, M.M. had trauma to his face as lacerations. He also had fractured ribs on both sides of his body, a fractured left hand and a nail in his heel that went into the bone. The Medical Examiner’s Office concluded that M.M.’s cause of death was blunt trauma and his manner of death was homicide.

Defendant Martinez 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:
11/08/2021 12:03 PM
Hennepin County, Minnesota

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

Prosecuting Attorney

Krista White
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
11/08/2021 11:53 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: November 8, 2021.

Judicial Officer

Anna Andow
District Court Judge

Electronically Signed: 11/08/2021 01:14 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.

TOMASA LESHAE MARTINEZ

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: TOMASA LESHAE MARTINEZ
DOB: 07/14/1991
Address: 3200 4th Ave S
Minneapolis, MN 55408

Alias Names/DOB:

SID: MN12FC3621

Height:

Weight:

Eye Color:

Hair Color:

Gender: FEMALE

Race: White

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: Yes

Driver's License #:

SILS Person ID #: 725624

SILS Tracking No. 3251932

Case Scheduling Information: CO-DEFENDANTS:

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	3/27/2021	609.25.1 Kidnapping-Confine/Remove Any Person-No Consent	Felony	K1342	X	MN0271100	21069862
	Modifier	3/27/2021	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	K1342	X	MN0271100	21069862
	Modifier	3/27/2021	609.05.1 Liability for Crimes of Another-Intentional	No-Level	K1342	X	MN0271100	21069862