

P E T I T I O N

STATE OF MINNESOTA

DISTRICT COURT – JUVENILE DIVISION

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

27-JV-22-5

IN THE MATTER OF THE WELFARE OF

Child: Jayce Nasir Cuff, (4/17/2005)
Jayce Cuff, (4/18/2006)
2220 42nd St E
Minneapolis, MN 55407

SILS ID: 886341
Family ID:
C.A. Case No: 22J00003

CA of Record: Shirin Johnson
(0400127)

Mother: Angel Dionne Adams
(Same as Child)

**Juvenile Felony Delinquency Age 16 Or Older
FIREARM
Presumptive Certification**

Father: Unknown

PO:

The Juvenile Court has jurisdiction by reason of the following allegations: The above-named juvenile is alleged to be delinquent pursuant to Minn. Stat. § 260B.007, Subd. 6(1) because said child has violated a state/local law as follows:

Count 1: R1323 Aggravated Robbery-1st Degree (Felony) (Aid/Abet)
MINN. STAT. 609.245.1, 609.245.1, 609.11.5(a), 609.05.1, 609.05.2

That on or about December 29, 2021, in Minneapolis, Hennepin County, Minnesota, Jayce Nasir Cuff, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another, using a firearm, took personal property from the person or in the presence of victim, knowing that he was not entitled to the property and used and/or threatened the imminent use of force against victim to overcome her resistance or powers of resistance to or to compel acquiescence in the taking or carrying away of the property, and inflicted bodily harm upon victim.

Count 2: A2223 Assault-2nd Degree-Dangerous Weapon-Substantial Bodily Harm (Felony) (Aid/Abet)
MINN. STAT. 609.222.2, 609.222.2, 609.05.1, 609.05.2, 609.101.2

That on or about December 29, 2021, in Minneapolis, Hennepin County, Minnesota, Jayce Nasir Cuff, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another, assaulted victim and inflicted substantial bodily harm.

PROBABLE CAUSE STATEMENT

Your Petitioner is an Assistant County Attorney. In that capacity, Petitioner believes the facts and circumstances recited below establish probable cause:

On December 29, 2021, at approximately 11:31 a.m., officers were dispatched to a robbery of a business at Bryn Mawr Market, 412 Cedar Lake Road South, Minneapolis, Hennepin County, Minnesota.

The investigation into this incident involved review of surveillance video, execution of search warrants, and interviews with witnesses. The investigation determined that the robbery was committed by 4 juvenile males:

Co-Respondent 1 - identified as a known 17-year-old male;
Co-Respondent 2 – identified as a known 14-year-old male;
Co-Respondent 3 - identified Jayce Cuff, a 16-year-ols male;
Co-Respondent 4 – identified as a known 15-year-old male.

Surveillance video of the incident showed that Co-Respondent 1, pointed a black semi-automatic handgun at the cashier, victim herein, while the other three males went around the counter to where the victim was standing. Once behind the counter, Co-Respondent 2 took the gun from Co-Respondent 1 and pointed the gun at the cashier's head and Co-Respondent 3, identified as Jayce Cuff ("Co-Respondent 3" herein after), sat on the counter and tried to get the cash register open. While this was happening, Co-Respondent 4 was going through drawers behind the victim.

In the video, Co-Respondent 1 is wearing a black jacket, black hooded sweatshirt with white writing across chest, dark colored pants, and a black balaclava. Co-Respondent 2 is wearing light colored pants, a black jacket with white stripes on the arm and a yellow design on the back, a yellow hooded sweatshirt, a light colored balaclava with a design, and white and yellow tennis shoes. Co-Respondent 3 is wearing blue jeans with rips with a dark blue cloth underneath, black with blue striped shoes, and a black shiny/puffy style jacket. Co-Respondent 4 is wearing a black jacket with gray on the sleeves, dark pants with a stripe down the side, a black balaclava, and dark tennis shows.

When the victim tried to open the cash register, but could not, Co-Respondent 2 hit the victim in the head with the handgun, then shoved the barrel of the gun into the side of the victim's head. Co-Respondent 4, who had been going through the drawers behind the counter, grabbed the handgun from Co-Respondent 2, stepped back and shot the victim in the foot. Co-Respondent 2 then punched the victim in the face. As the four suspects ran from the store, Co-Respondent 4 turned and shot the victim in the stomach. Video surveillance from inside the store shows the incident in its entirety. The four suspects ran north in the alley, got into a vehicle and fled the scene. The victim was transported by ambulance to the hospital where she was immediately taken into surgery. Her condition is not known at this time.

Surveillance video from the area shows that one of the suspects later identified as Co-Respondent 2 walked into and out of the store with a limp. Investigators were aware that Co-Respondent 2 was recently involved in a serious accident and was injured.

On December 29, 2021, at 1:32 p.m., about two hours after the shooting/robbery, officers located a live-stream video posted to Co-Respondent 2's social media account. In that video, Co-Respondent 2 tagged Co-Respondent 1, Co-Respondent 3, and Co-Respondent 4. In the video the suspects are wearing some of the same clothing as they were wearing during the robbery. Co-Respondent 2 is wearing a yellow hooded sweatshirt, and a light-colored balaclava with a design. Co-Respondent 3 is wearing a black shiny puffy style jacket, black hooded sweatshirt, and a black balaclava. Co-Respondent 1 wearing a black hooded sweatshirt with white writing across the chest and a black balaclava. Co-Respondent 4 is wearing a black and gray jacket and a black balaclava. This clothing appears to be the same clothing worn by each suspect at the time of the robbery.

Surveillance video from the Bryn Mawr Market shows the four suspects arrived at the Market and likely fled from the Market in a red Mazda that had been stolen from St. Paul. The vehicle had a unique turtle

shaped sticker/logo on the driver side rear window. Shortly after the robbery/shooting at the Bryn Mawr Market, officers located this stolen vehicle, which had the sticker. It was found around the corner from Co-Respondent 2's residence in Minneapolis. Officers had the vehicle towed.

A short time later, three black males walked out of Co-Respondent 2's residence, walked to where the carjacked vehicle had been parked, stopped and looked around for the car. The three male suspects returned to Co-Respondent 2's residence and went inside. At approximately 7:39 p.m. several males and two females exited Co-Respondent 2's residence. One of the males got into a vehicle that had pulled up in front of the residence. The rest of the group walked toward Olson and Penn in Minneapolis. The group was stopped. Two of the males stopped were Co-Respondent 3 and Co-Respondent 4. A 9mm gun was found close to Co-Respondent 4. The Hyundai vehicle the male got into was also stopped. Co-Respondent 2 was found inside. Co-Respondent 1 was arrested later in connection with a separate case.

Co-Respondent 2 residence was searched per a search warrant. Two rifle rounds were found in Co-Respondent 2's bedroom. A yellow sweatshirt similar to what Co-Respondent 2 was wearing in the video was found in Co-Respondent 2's bedroom.

Multiple aggravating factors exist in this case including (1) the victim was treated with particular cruelty and (2) the respondent committed the crime as part of a group of three or more offenders who all actively participated in the crime.

The offenses enumerated in Counts 1 and 2 are felonies that involve the use of a firearm.

The offense enumerated in Count 1 is a presumptive prison offense.

PURSUANT TO M.S. 260B.125, THE STATE IS MOVING, BY SEPARATE MOTION, THAT THIS PROCEEDING BE CERTIFIED TO THE DISTRICT COURT FOR ACTION UNDER THE CRIMINAL LAWS.

I endorse this Petition as to form and verify that the contents are true to the best of my information and belief pursuant to MRJDP 6.03, Subd. 3.

I DECLARE UNDER PENALTY OF PERJURY THAT EVERYTHING I HAVE STATED IN THIS DOCUMENT IS TRUE AND CORRECT.

Shirin Johnson 01/03/2022

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