

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 23A04198
Court File No. 27-CR-23-7968

State of Minnesota,

COMPLAINT

Plaintiff,

Warrant

vs.

JAYQUANN LEON KENNEDY DOB: 12/22/1998

1621 Timberlake Road
Apt B
St. Paul, MN 55117

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: Aggravated Robbery-1st Degree

Minnesota Statute: 609.245.1, with reference to: 609.245.1, 609.11.5(a), 609.17.4(2), 609.05.1, 609.05.2
Maximum Sentence: 20 YEARS AND/OR \$35,000
Offense Level: Felony

Offense Date (on or about): 04/11/2023

Control #(ICR#): 23012648

Charge Description: That on or about 4/11/2023, in Brooklyn Park, Hennepin County, Minnesota, JAYQUANN LEON KENNEDY, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another, or otherwise procuring another to commit the crime, attempted to take personal property from the person or in the presence of Victim 2, knowing that he was not entitled to the property and used and/or threatened the imminent use of force against Victim 2 to overcome his resistance or powers of resistance or to compel acquiescence in the taking or carrying away of the property, while using a firearm.

Minimum Sentence: 3 YEARS

COUNT II

Charge: Assault-2nd Degree-Dangerous Weapon

Minnesota Statute: 609.222.1, with reference to: 609.222.1, 609.11.5(a), 609.05.1, 609.05.2, 609.101.2
Maximum Sentence: 7 YEARS AND/OR \$4,200-\$14,000
Offense Level: Felony

Offense Date (on or about): 04/11/2023

Control #(ICR#): 23012648

Charge Description: That on or about 4/11/2023, in Brooklyn Park, Hennepin County, Minnesota, JAYQUANN LEON KENNEDY, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another or otherwise procuring the other to commit the crime, assaulted Victim 1, while using a firearm.

Minimum Sentence: 3 YEARS

COUNT III

Charge: Assault-2nd Degree-Dangerous Weapon

Minnesota Statute: 609.222.1, with reference to: 609.222.1, 609.11.5(a), 609.05.1, 609.05.2, 609.101.2

Maximum Sentence: 7 YEARS AND/OR \$4,200-\$14,000

Offense Level: Felony

Offense Date (on or about): 04/11/2023

Control #(ICR#): 23012648

Charge Description: That on or about 4/11/2023, in Brooklyn Park, Hennepin County, Minnesota, JAYQUANN LEON KENNEDY, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another or otherwise procuring the other to commit the crime, assaulted Victim 2, while using a firearm.

Minimum Sentence: 3 YEARS



STATEMENT OF PROBABLE CAUSE

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

On April 11, 2023, officers with the Brooklyn Park police department responded to the area of 3553 Brookdale Drive North in Brooklyn Park, Hennepin County, Minnesota. This response was a result of multiple 911 calls reporting a shooting in the area.

Upon arrival, officers located and identified a male gunshot wound victim (herein Victim 1). Victim 1 was suffering from four gunshot wounds. His condition was later determined to be serious, but non-life threatening. Victim 1 explained that he and his friend (herein Victim 2) came to the area in Victim 2's red Ford 500 sedan because Victim 2 was planning on selling a pair of shoes to someone that Victim 2 had been talking to on the phone. Victim 2 then drove them to the area and Victim 1 sat in the front passenger seat. They arrived in the area and parked. Shortly thereafter, a white sedan pulled in very close behind the red sedan, blocking the red sedan in its parking spot. A male wearing a black mask got out of the white sedan and then entered the rear passenger seat of the red sedan. The man in the mask and Victim 2 began talking and Victim 2 handed over a pair of shoes to the man. After that, two more men wearing masks exited the white sedan and approached either side of the red sedan. Victim 1 observed the masked man on the passenger side of the car pull out a firearm with an extended magazine. Victim 1 put his hands in the air expecting to be robbed. The man in the back seat then began asking Victim 2 if he owed anything to the people outside. Suddenly, as Victim 1's hands remained in the air, at least one of the men began shooting into the car. Victim 1 was struck by gunfire but was able to exit the car and run away. He ran up to multiple townhomes and banged on the doors begging for someone to call 911. Meanwhile Victim 2 drove the red sedan away from the area, and the three men got back into the white sedan and drove away.

Multiple eyewitnesses were also able to describe what they saw. Witness 1 told police that she observed a red car, a white car, and a black car all parked near each other. Suddenly she heard several pops going off which drew her attention to the area. She looked over and saw that a man was outside of the white car and was "scooting" or crawling around on the ground. She also saw two other men from the white sedan running towards the townhomes. One of the men had a gun in his hand and appeared to be reinserting a magazine into the gun. Witness 2 told police that when the loud popping noises started, the red sedan backed up and collided with the white sedan. Witness 2 saw two men running from the white sedan towards the townhomes and these men were both wearing what looked like black ski masks. One of the men was holding a gun. The men eventually came back to the white sedan, helped a third male into the back of the white sedan, and drove away from the area. Witness 3 stated that he didn't see the shooting, but he believed that he heard both automatic and semi-automatic gunfire coming from the area of the shooting.

Officers quickly began looking for a white sedan that would be damaged and possibly covered in blood. A 911 caller reported that her vehicle was nearly struck by a damaged white sedan with the rear passenger door wide open and what appeared to be a person's foot sticking out of the rear passenger door. The caller also reported that there appeared to be blood on the vehicle.

Officers searching the area located a white sedan matching the description of the vehicle they were looking for. This vehicle was parked in the driveway of a residence near 4900 Brookdale Drive North. This residence is known to be the residence of suspect Demaj Miles. As officers approached, they were able to observe a man in the driver's seat, a man laying across the rear passenger seats, and a man standing outside of the car near the rear-driver's side door. The man standing just outside of the car was identified as DENEKO LAMONT PLENTYHORSE; DOB: 6/20/2000 (herein Defendant Plentyhorse). The man in the

driver's seat was noted to have a gunshot wound to his right hand. He was identified as COREY CORTEZ STEWART; DOB: 8/28/1998 (herein Defendant Stewart). The male laying in the rear passenger seat was found to have a gunshot wound to his leg. This man was identified as JAYQUANN LEON KENNEDY; DOB: 12/22/1998 (herein Defendant Kennedy). Defendant Stewart was wearing a black mask at the time that police located him. A black mask was also found among Defendant Kennedy's personal belongings. Officers attempted to gain information about how Defendant Kennedy and Defendant Stewart were shot, however they were unwilling to provide any details.

Officers noted that all three Defendants were yelling towards the house that they were parked in front of and were trying to get the attention of the people in the house. Police subsequently obtained a search warrant to search the address. In a basement bedroom, police recovered a firearm with a clear extended magazine partially concealed under some clothing. Officers also lifted the mattress in the bedroom and located two more firearms which both had extended magazines. One of the Glock 19 firearms found under the mattress had an auto sear or a "switch" which allows the semi-automatic handgun to fire fully automatic.

Officers recovered the red sedan which was located inside of Victim 2's garage. The vehicle was heavily damaged with three of the four windows shattered and damage to the rear-end of the vehicle. In addition, there was a significant amount of blood in the vehicle. Victim 2 was located and had not suffered any gunshot wounds.

Defendant Plentyhorse is currently on supervised release from the Department of Corrections as a result of a conviction in court file 27-CR-20-25177 for Aggravated Robbery in the First Degree.

All three Defendants were placed under arrest and are currently in custody. DNA samples were collected from all three Defendants and from several other witnesses. These samples will be compared against DNA swabs taken from the firearms recovered in this case. Additionally, several cell phones were collected which will likely contain information of evidentiary value. Investigation is ongoing.

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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

Ryan Hjelm
Sergeant
5400 85th Ave N
Brooklyn Park, MN 55443
Badge: 184

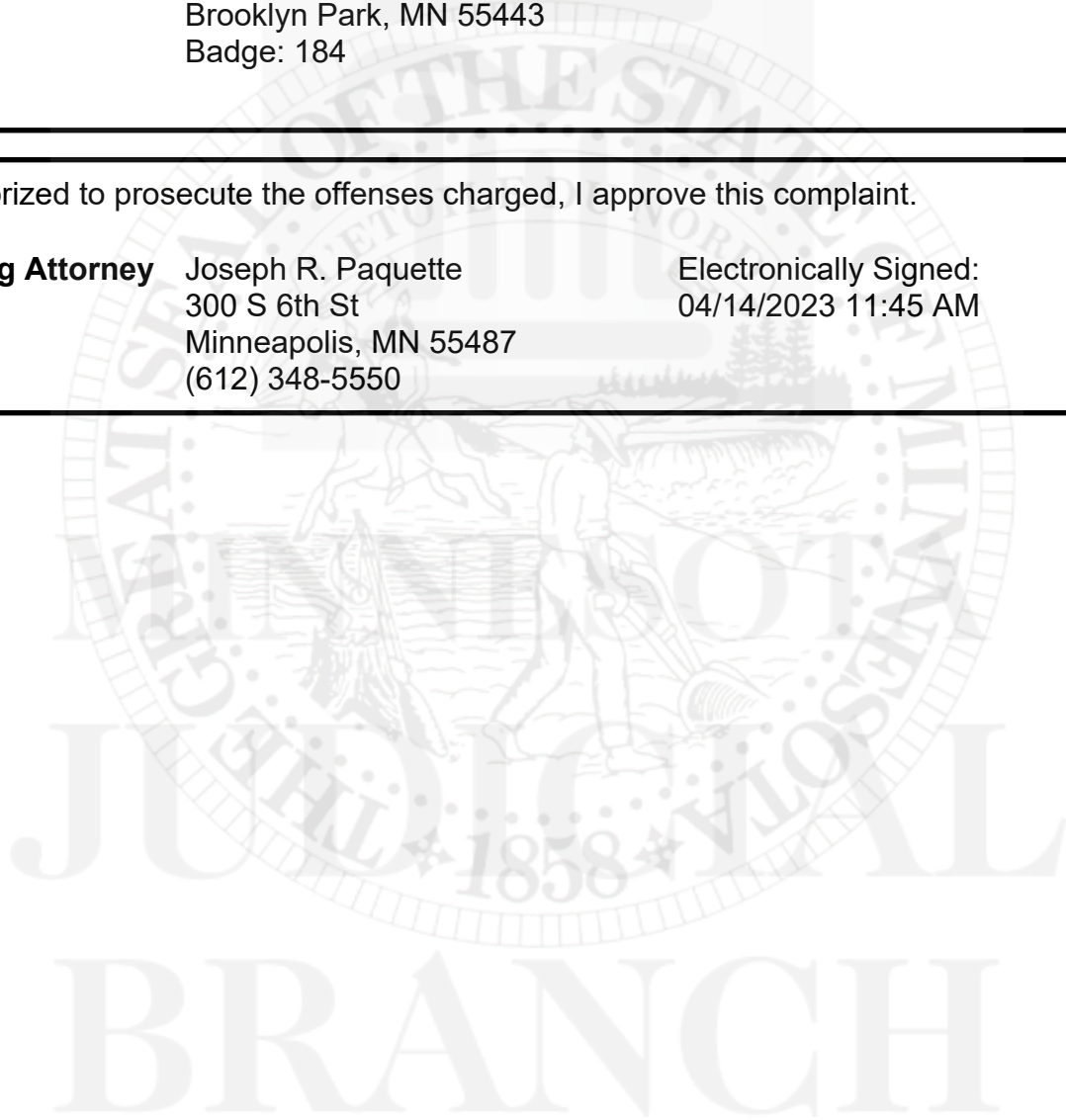
Electronically Signed:
04/14/2023 11:53 AM
Hennepin County, MN

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

Prosecuting Attorney

Joseph R. Paquette
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
04/14/2023 11:45 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: \$100,000.00

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: April 14, 2023.

Judicial Officer

Juan Hoyos
District Court Judge

Electronically Signed: 04/14/2023 02:14 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.

JAYQUANN LEON KENNEDY

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:

27-CR-23-7968
DEFENDANT FACT SHEET

Filed in District Court
State of Minnesota
4/14/2023

Name: JAYQUANN LEON KENNEDY
DOB: 12/22/1998
Address: 1621 Timberlake Road
Apt B
St. Paul, MN 55117

Alias Names/DOB: Jayquann Leon Harris Kennedy DOB: 12/22/1998

SID:

Height:

Weight:

Eye Color:

Hair Color:

Gender:

Race:

Fingerprints Required per Statute:

Fingerprint match to Criminal History Record: No

Driver's License #:

SILS Person ID #:

SILS Tracking No.

Alcohol Concentration:

MALE

Black

Yes

896039

3329611

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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	4/11/2023	609.245.1 Aggravated Robbery-1st Degree	Felony	R1122	A	MN0270300	23012648
	Modifier	4/11/2023	609.05.1 Liability for Crimes of Another-Intentional	No-Level	R1122	A	MN0270300	23012648
	Modifier	4/11/2023	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	R1122	A	MN0270300	23012648
	Penalty	4/11/2023	609.17.4(2) Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended	Felony	R1122	A	MN0270300	23012648
	Penalty	4/11/2023	609.245.1 Aggravated Robbery-1st Degree	Felony	R1122	A	MN0270300	23012648
	Penalty	4/11/2023	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	R1122	A	MN0270300	23012648
2	Charge	4/11/2023	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2323	X	MN0270300	23012648
	Modifier	4/11/2023	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	A2323	X	MN0270300	23012648
	Definition	4/11/2023	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A2323	X	MN0270300	23012648
	Modifier	4/11/2023	609.05.1 Liability for Crimes of Another-Intentional	No-Level	A2323	X	MN0270300	23012648
	Penalty	4/11/2023	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2323	X	MN0270300	23012648
	Penalty	4/11/2023	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	A2323	X	MN0270300	23012648
3	Charge	4/11/2023	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2422	X	MN0270300	23012648
	Modifier	4/11/2023	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	A2422	X	MN0270300	23012648
	Definition	4/11/2023	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A2422	X	MN0270300	23012648
	Modifier	4/11/2023	609.05.1 Liability for Crimes of Another-Intentional	No-Level	A2422	X	MN0270300	23012648
	Penalty	4/11/2023	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2422	X	MN0270300	23012648
	Penalty	4/11/2023	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	A2422	X	MN0270300	23012648