

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 22A02003
Court File No. 27-CR-22-4908

State of Minnesota,

Plaintiff,

vs.

LAVELL JACVON PIGGIE DOB: 09/15/2002

3920 Bales Ave
Kansas City, MO 64130

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), 609.19.1, 609.11.9

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 02/10/2022

Control #(ICR#): 22029088

Charge Description: That on or about February 10, 2022, in Minneapolis, Hennepin County, Minnesota, Lavell Jacvon Piggie, caused the death of Victim 1, 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: Murder - 2nd Degree - With Intent-Not Premeditated

Minnesota Statute: 609.19.1(1), with reference to: 609.11.5(a), 609.19.1, 609.11.9

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 02/10/2022

Control #(ICR#): 22029088

Charge Description: That on or about February 10, 2022, in Minneapolis, Hennepin County, Minnesota, Lavell Jacvon Piggie, caused the death of Victim 2, 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

STATEMENT OF PROBABLE CAUSE

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

On Feb. 10, 2022, at 3:43 p.m., officers responded to a report of gunshots near 2031 Sheridan Ave. N in Minneapolis, Hennepin County, Minnesota. Upon arrival, officers observed a four-door sedan which had jumped the curb and come to a stop in a snowbank. The rear passenger-side door was open, but the vehicle was running and shifted into drive. Officers observed two males with gunshot wounds in the front seat. Officers attempted life-saving measures but soon recognized that each male was deceased. The male in the driver's seat was identified as Victim 1, and the male in the front passenger seat was identified as Victim 2. The Hennepin County Medical Examiner later determined that Victim 1 suffered four gunshot wounds to his head and that Victim 2 suffered four gunshot wounds (two to his head, a third to his neck, and a fourth to his left forearm). For each victim, the gunshot wounds caused his death, and the manner of death was homicide.

The vehicle was registered to Victim 2. The vehicle contained considerable personal property, allowing room for only a single individual to sit in the backseat, specifically on the passenger side. Officers collected eight .40 caliber discharged cartridge casings (DCCs) from the passenger-side area of the backseat. A forensic examination of the DCCs revealed the presence of matching features, consistent with having been fired from the same handgun.

Officers recovered Victim 1's cell phone from his body. Phone data established that, from 2:05 p.m. to 3:34 p.m., Victim 1 was located at 1818 Bryant Ave. N.; that Victim 2 and Victim 1 coordinated a plan for Victim 2 to drive to Victim 1's location and give Victim 1 a ride; and that, at 3:30 p.m., Victim 2 reported that he had arrived.

Officers met an individual, identified as Witness 1, who reported that she had been with Victim 1 and an adult male nicknamed "Trig" in an apartment located at 1818 Bryant Ave. N. prior to the murder. Surveillance video from that location revealed that Victim 1 was with an adult male wearing a black and gray coat, who Victim 1 identified as "Trig." The video revealed Victim 2's vehicle pulling up to the location; Victim 1 and "Trig" approaching the vehicle; Victim 2 exiting the vehicle to re-position himself in the passenger seat; Victim 1 getting into the driver's seat; and "Trig" getting into the rear passenger seat. The vehicle then left the area at 3:34:41 p.m.

Officers recovered data on Victim 1's phone showing that, from 3:34 to 3:42 p.m., Victim 1 steadily traveled across North Minneapolis from 1818 Bryant Ave. to the location of the shooting. Officers recovered video footage from cameras positioned along Broadway Ave. and Golden Valley Rd. which captured Victim 2's vehicle traveling along the same course without interruption during the same timeframe.

Recovered data from Victim 1's phone revealed that, at 3:42 p.m., he received a phone call from Witness 1. Witness 1 explained to officers that she placed that call to inform Victim 1 that he left his keys at her apartment and that Victim 1 responded that he would return to her residence to retrieve them.

Officers obtained surveillance footage from a residence near 2031 Sheridan Ave which captured the sound of eight gunshots at 3:42:41 p.m. Officers encountered an eyewitness, identified as Witness 2, who reported that he heard gunfire, turned his attention to Victim's 2 vehicle, and then observed a lone adult male wearing dark clothing exit the vehicle's passenger side and flee on foot south down the alley between Sheridan Ave. and Russell Ave. Witness 2 then saw the vehicle roll to a stop and the victims' bodies

slumped over inside. Officers encountered another eyewitness, identified as Witness 3, who reported that she saw the same lone male run down the same alley at that time and observed that he was in possession of a firearm. Officers encountered another witness, identified as Witness 4, who reported seeing a black male wearing a waist-length grey coat fleeing east on foot between houses on Russell Ave, approximately one block southeast of the shooting scene.

Officers obtained surveillance footage from a residence on Penn Ave. which captured a black male wearing a waist-length black and grey coat fleeing east on foot between houses on Penn Ave., approximately three blocks southeast of the shooting scene, at 3:45:17 p.m. Officers observed that the male captured in this video was the same male identified as "Trig" who left 1818 Bryant Ave. with Victim 1 and Victim 2 at 3:34:41 p.m.

Officers received information that Victim 1 had an associate nicknamed "Trig" whose phone number was saved in Victim 1's cell-phone contacts. Officers located that number, which has a 402 area-code, and received information that it was utilized by an individual identified as Lavell Piggie, the defendant in this case. Officers again met with Witness 1, who was shown a photograph of Defendant. Defendant was identified as "Trig."

Officers asked Witness 1 what happened to Victim 1's keys. Witness 1 explained that, on the evening of Feb. 10, before she learned of Victim 1's murder, she received multiple electronic communications from Defendant and his close associate; that the communications pertained to Victim 1's keys; that Defendant asked her for Victim 1's keys, and that Defendant then personally retrieved the keys from her at 1818 Bryant Ave.

Surveillance video reveals that Defendant returned to 1818 Bryant Ave. with his close associate at 8:46 p.m.; walked directly to Witness 1's apartment, and left immediately afterwards.

Officers received records derived from Defendant's phone use. The records establish that the phone was near 2031 Sheridan Ave. at 3:44 p.m., which was approximately one minute after the murders and during the shooting suspect's apparent flight on foot. The records also establish that the phone was near 1818 Bryant Ave. at 8:46 p.m., which was when Defendant was captured on surveillance video retrieving Victim 1's keys from Witness 1.

On Feb. 17, 2022, officers executed a search warrant on Defendant's residence and located significant amounts of suspected crack cocaine, marijuana, fentanyl, and various other narcotics; over \$3000 in cash; and a baggie filled with .40 caliber live rounds of ammunition. Officers noted that the live rounds were the same caliber and were from the same manufacturer as the DCCs located in the backseat of Victim 2's vehicle.

On Feb. 22, 2022, officers received information that Defendant's phone was in Brooklyn Center. Officers responded to the area and located a vehicle associated with Defendant. Officers attempted to stop the vehicle, but the vehicle fled from officers at high speed. Officers pursued the vehicle and were compelled to utilize multiple PIT maneuvers to stop the vehicle. After stopping the vehicle, officers identified the driver as Defendant and arrested him. In Defendant's possession, officers located the phone which utilized Defendant's 402 area-code phone number.

In a Mirandized statement, Defendant denied knowing Witness 1; being at Witness 1's apartment on Feb. 10; being captured on surveillance video with Victim 1 prior to the murder; knowing Victim 2; entering Victim 2's vehicle on Feb. 10; having the nickname "Trig," and using the 402 area-code phone number.

Officers subsequently spoke to multiple witnesses; reviewed recorded conversations; and recovered

phone data which establish that Defendant knew and communicated with Witness 1 on Feb. 10; that he was the individual who left 1818 Bryant Ave. with Victim 1 before the murder; that he went by the nickname "Trig;" and that he regularly used the 402 area-code phone number.

The investigation is ongoing. Forensic testing is pending.

A warrant is necessary because Defendant is in custody on unrelated charges.



MINNESOTA
JUDICIAL
BRANCH

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: 03/16/2022 01:43 PM Hennepin County, suchtmj0
--------------------	--	--

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

Prosecuting Attorney	Joshua Larson 300 S 6th St Minneapolis, MN 55487 (612) 348-5550	Electronically Signed: 03/16/2022 01:39 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: No Possession of Weapons; Make All Appearances; Remain Law Abiding; No use of drugs/alcohol; Random UAs; No Contact with Address

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: March 16, 2022.

Judicial Officer

Shereen Askalani
District Court Judge

Electronically Signed: 03/16/2022 01:54 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.

Lavell Jacvon Piggie

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: Lavell Jacvon Piggie
DOB: 09/15/2002
Address: 3920 Bales Ave
Kansas City, MO 64130

Alias Names/DOB: Lavell Piggie DOB: 2/15/2002
SID: MN22DC6682

Height:

Weight:

Eye Color:

Hair Color:

Gender:

Race:

Fingerprints Required per Statute:

Fingerprint match to Criminal History Record:

Driver's License #:

SILS Person ID #:

SILS Tracking No.

Alcohol Concentration:

MALE

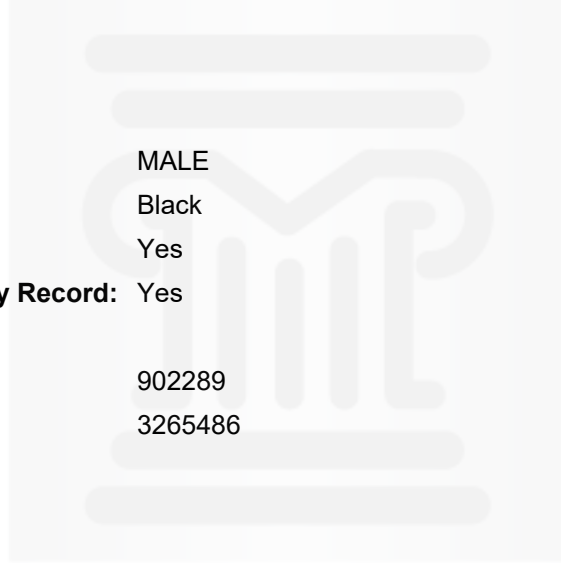
Black

Yes

Yes

902289

3265486



MINNESOTA
JUDICIAL
BRANCH

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	2/10/2022	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2012		MN0271100	22029088
	Modifier	2/10/2022	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2012		MN0271100	22029088
	Penalty	2/10/2022	609.19.1 Murder - 2nd Degree	Felony	H2012		MN0271100	22029088
	Penalty	2/10/2022	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2012		MN0271100	22029088
2	Charge	2/10/2022	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2012		MN0271100	22029088
	Modifier	2/10/2022	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2012		MN0271100	22029088
	Penalty	2/10/2022	609.19.1 Murder - 2nd Degree	Felony	H2012		MN0271100	22029088
	Penalty	2/10/2022	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2012		MN0271100	22029088

MINNESOTA
JUDICIAL
BRANCH