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**State of Minnesota,**  
Plaintiff,

**COMPLAINT**  
Warrant

vs.

**VYSEAN IVORY JOHNSON DOB: 09/01/1988**

3917 26TH AVE S  
Minneapolis, MN 55406

Defendant.

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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: 609.19.1(1), 609.229.3(a), 609.11.5(a), 609.17.4(2)

Maximum Sentence: 25 YEARS

Offense Level: Felony

Offense Date (on or about): 08/26/2014

Control #(ICR#): 14302323

Charge Description: That on or about 8/26/2014, in Hennepin County, Minnesota, VYSEAN IVORY JOHNSON, attempted to cause the death of D.S., a human being, with intent to effect the death of that person or another, but without premeditation, while using a firearm for the benefit of, at the direction of, in association with or motivated by involvement with a criminal gang, with the intent to promote, further, or assist in criminal conduct by gang members.

Minimum Sentence: 3 YEARS

**COUNT II**

**Charge: Murder - 2nd Degree - With Intent-Not Premeditated**

Minnesota Statute: 609.19.1(1), with reference to: 609.19.1(1), 609.229.3(a), 609.11.5(a), 609.17.4(2)

Maximum Sentence: 25 YEARS

Offense Level: Felony

Offense Date (on or about): 08/26/2014

Control #(ICR#): 14302323

Charge Description: That on or about 8/26/2014, in Hennepin County, Minnesota, VYSEAN IVORY JOHNSON, attempted to cause the death of A.S., a human being, with intent to effect the death of that person or another, but without premeditation, while using a firearm for the benefit of, at the direction of, in association with or motivated by involvement with a criminal gang, with the intent to promote, further, or assist in criminal conduct by gang members.

Minimum Sentence: 3 YEARS

### COUNT III

**Charge: Murder - 2nd Degree - With Intent-Not Premeditated**

Minnesota Statute: 609.19.1(1), with reference to: 609.19.1(1), 609.11.5(a), 609.17.4(2)

Maximum Sentence: 20 YEARS

Offense Level: Felony

Offense Date (on or about): 08/26/2014

Control #(ICR#): 14302323

Charge Description: That on or about 8/26/2014, in Hennepin County, Minnesota, VYSEAN IVORY JOHNSON , attempted to cause the death of D.S., 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 IV

**Charge: Murder - 2nd Degree - With Intent-Not Premeditated**

Minnesota Statute: 609.19.1(1), with reference to: 609.19.1(1), 609.11.5(a), 609.17.4(2)

Maximum Sentence: 20 YEARS

Offense Level: Felony

Offense Date (on or about): 08/26/2014

Control #(ICR#): 14302323

Charge Description: That on or about 8/26/2014, in Hennepin County, Minnesota, VYSEAN IVORY JOHNSON , attempted to cause the death of A.S., 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 August 26, 2014, officers responded to a call of a shooting near 38th Street and Portland Avenue South, City of Minneapolis, County of Hennepin, State of Minnesota. Officers arrived and learned that two individuals, A.S. and D.S., had been shot. Officers noted that A.S. had a wound to his hand while D.S. had a wound to his lower back.

Officers spoke with A.S. A.S. told officers that he and D.S. were walking westbound on 38th Street and had just crossed Oakland Avenue when he heard a male yell, "What's up blood?" A.S. said he turned and saw a male, later identified as VYSEAN IVORY JOHNSON, "the Defendant" herein, in a red SUV pointing a silver handgun at him. A.S. told officers that the Defendant was in the driver's seat and pointing the handgun past the female passenger who was in the front seat. A.S. stated that the Defendant began to fire the handgun at him and D.S. A.S. said that he felt his hand get hit and noticed D.S. fall to the ground. A.S. told officers he thought the Defendant fired six to eight times before driving off down Oakland Avenue. A.S. stated that he helped D.S. get to a store near 38th Street and Portland Avenue and waited there for police.

Officers learned that D.S. required surgery for his injuries. D.S. said that he was walking down the street with A.S. and T.M. when he was shot. D.S. said the shooter was driving a bright red Tahoe. D.S. also noted that the front passenger was a female. D.S. told officers that he had heard the Defendant was the shooter.

Officers spoke to one witness who heard gunshots and observed a red Suburban driving fast southbound from 38th Street from Oakland Avenue. A second witness also observed a red Tahoe or Suburban driving down Oakland Avenue after hearing gunshots.

Officers learned that the Defendant's girlfriend was known to drive a red SUV, specifically a Yukon. Your Complaint is aware that the Yukon is similar in appearance to both the Suburban and Tahoe. Officers found photographs of the Defendant and his girlfriend with a red Yukon on the internet. Officers showed A.S. a series of photographs that contained a picture of the Defendant. A.S. viewed the photograph of the Defendant twice and initialed it to indicate that it was the photograph that most resembled the person who shot at him. A.S. would later tell officers that he knew who shot him, but did not want to provide the information out of concern for being labelled as a snitch.

Officers spoke with a known individual, "Witness A." Witness A told officers that s/he was at the scene when the shooting occurred. Witness A told officers that s/he observed the Defendant driving the red vehicle and saw the Defendant shoot at A.S. and D.S.

Your Complaint is aware that the area where this incident occurred is known as part of territory of the street gang "Bloods." Your Complainant is also aware that the Bloods are rivals of the "10s" street gang. D.S. told officers that he previously associated with the Bloods. D.S. also told officers that the Defendant is a member of the 10s. Witness A also told officers that the Defendant is one of the main "shooters" for the 10s. Your Complainant is aware that the 10s and Bloods both meet the statutory definition of a criminal street gang. The 10s are known to commit crimes of violence, including assault and weapons related offenses. Your Complainant is aware that this incident is of the type used by 10s to assert authority on the street and bolster their reputation as a street gang.

## 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**

Gregory Freeman  
Police Sergeant  
350 S 5th St  
Minneapolis, MN 55415-1389  
Badge: 2105

Electronically Signed:  
09/24/2014 12:01 PM

Subscribed and sworn to before the undersigned.

**Notary Public or  
Judicial Official**

Kristine Ann Phelps  
PST1, County of Hennepin  
350 S 5th St  
Minneapolis, MN 55415-1389  
Notary ID: 20283036

Commission expires: 01/31/2017  
Electronically Signed:  
09/24/2014 01:31 PM

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

**Prosecuting Attorney**

Mike Radmer  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
09/24/2014 11:58 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 on \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ **AM/PM** before the above-named court at 401 Fourth Avenue S, Minneapolis, MN 55415 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: \$1,000,000.00  
Conditions of Release:

This complaint is issued by the undersigned Judge as of the following date: September 24, 2014.

**Judicial Officer** Thomas M. Sipkins  
judge

Electronically Signed: 09/24/2014 02:01 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.

**VYSEAN IVORY JOHNSON**

Defendant

*Clerk's Signature or File Stamp:*

**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: