

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 20A06640
Court File No. 27-CR-20-12859

State of Minnesota,

Plaintiff,

vs.

JALEEL KEVIN STALLINGS DOB: 08/10/1992

752 LAFOND
St. Paul, MN 55104

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

Minnesota Statute: 609.19.1(1), with reference to: 609.17.4(2), 609.19.1, 609.11.9

Maximum Sentence: HALF OF, 40 YEARS

Offense Level: Felony

Offense Date (on or about): 05/30/2020

Control #(ICR#): 20146953

Charge Description: That on or about May 30, 2020, in Hennepin County, Minnesota, JALEEL KEVIN STALLINGS attempted to cause the death of Officer A, a human being, with intent to effect the death of that person or another, but without premeditation.

COUNT II

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

Minnesota Statute: 609.19.1(1), with reference to: 609.17.4(2), 609.19.1, 609.11.9

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 05/30/2020

Control #(ICR#): 20146953

Charge Description: That on or about May 30, 2020, in Hennepin County, Minnesota, JALEEL KEVIN STALLINGS attempted to cause the death of Officer B, a human being, with intent to effect the death of that person or another, but without premeditation.

COUNT III

Charge: Assault-1st Degree-Use of deadly force against peace officer/prosecutor/judge or correction employee

Minnesota Statute: 609.221.2(a), with reference to: 609.17.4(2), 609.101.2, 609.221.2(a), 609.221.2(b)
Maximum Sentence: 20 YEARS AND/OR \$30,000, WITH NO SUPERVISED RELEASE
Offense Level: Felony

Offense Date (on or about): 05/30/2020

Control #(ICR#): 20146953

Charge Description: That on or about May 30, 2020, in Hennepin County, Minnesota, JALEEL KEVIN STALLINGS while using a dangerous weapon assaulted Officer A, a peace officer by attempting to use deadly force against the officer, while victim was engaged in the performance of his or her duties imposed by law, policy or rule.

Minimum Sentence: 10 YEARS

COUNT IV

Charge: Assault-1st Degree-Use of deadly force against peace officer/prosecutor/judge or correction employee

Minnesota Statute: 609.221.2(a), with reference to: 609.17.4(2), 609.101.2, 609.221.2(a), 609.221.2(b)
Maximum Sentence: 20 YEARS AND/OR \$30,000, WITH NO SUPERVISED RELEASE
Offense Level: Felony

Offense Date (on or about): 05/30/2020

Control #(ICR#): 20146953

Charge Description: That on or about May 30, 2020, in Hennepin County, Minnesota, JALEEL KEVIN STALLINGS while using a dangerous weapon assaulted Officer B, a peace officer by attempting to use deadly force against the officer, while victim was engaged in the performance of his or her duties imposed by law, policy or rule.

Minimum Sentence: 10 YEARS

COUNT V

Charge: Assault-2nd Degree-Dangerous Weapon

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

Offense Date (on or about): 05/30/2020

Control #(ICR#): 20146953

Charge Description: That on or about May 30, 2020, in Hennepin County, Minnesota, JALEEL KEVIN STALLINGS assaulted Officer A with a dangerous weapon, a firearm.

COUNT VI

Charge: Assault-2nd Degree-Dangerous Weapon

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

Offense Date (on or about): 05/30/2020

Control #(ICR#): 20146953

Charge Description: That on or about May 30, 2020, in Hennepin County, Minnesota, JALEEL KEVIN STALLINGS, assaulted Officer B with a dangerous weapon, a firearm

COUNT VII

Charge: Riot-2nd Degree-Armed w/Dangerous Weapon

Minnesota Statute: 609.71.2, with reference to: 609.71.2

Maximum Sentence: 5 YEARS AND/OR \$10,000

Offense Level: Felony

Offense Date (on or about): 05/30/2020

Control #(ICR#): 20146953

Charge Description: That on or about May 30, 2020, in Hennepin County, Minnesota, JALEEL KEVIN STALLINGS assembled with two or more other persons, disturbed the public peace by intentionally acting with unlawful force or violence to victims, and JALEEL KEVIN STALLINGS was armed with a dangerous weapon.

COUNT VIII

Charge: Dangerous Weapons-Intentional Discharge of Firearm That Endangers Safety

Minnesota Statute: 609.66.1a(a)(2)

Maximum Sentence: 2 YEARS AND/OR \$5,000

Offense Level: Felony

Offense Date (on or about): 05/30/2020

Control #(ICR#): 20146953

Charge Description: That on or about May 30, 2020 in Hennepin County, Minnesota, JALEEL KEVIN STALLINGS recklessly handled or used a gun or other dangerous weapon or explosive so as to endanger the safety of another.

STATEMENT OF PROBABLE CAUSE

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

On May 30, 2020, Minneapolis Police were working throughout the city due to civil unrest. Governor Walz instituted an 8:00 p.m. curfew in a number of cities, including Minneapolis. Around 10:54 p.m., Minneapolis Police Officers responded to the area of 15th Avenue South and Lake Street in the City of Minneapolis. There had been peaceful protests in the area. However, there had also been a great deal of property damage, including the burning of the Third Precinct Police Station. During these times, Officers had rocks and debris thrown at them, bottles of bodily fluids thrown at them, and shots fired at them. Shots were fired at officers around 4:00 a.m. on May 30, 2020

Officers were wearing their full uniforms and SWAT vest and helmet. Several SWAT Officers were in an unmarked white van being transported in the area. Two of the Officers in this unit were assigned to deploy 40-mm marking rounds. These were used to attempt to disperse crowds. The van was driving down Lake Street and flanked by two marked squad cars. The door of the van was open so that Officers could continue patrolling. As Officers approached 14th Avenue South, there was a group of people in the northeast corner of a parking lot.

Several people in the group ran away from law enforcement, but one male walked toward law enforcement from behind a full-sized white Chevy pickup truck. The male was a heavy-set African American wearing red shorts and a black face mask. The male, later identified as JALEEL KEVIN STALLINGS (D.O.B. 8-10-1992) (hereinafter "STALLINGS"), ran toward the driver's side door and crouched down as if to pick up something. Officers were concerned another rock or piece of debris was going to be thrown at them and deployed one 40-mm round at STALLINGS.

Almost immediately, Officer A saw three to four gunshot muzzle flashes from STALLINGS' chest toward law enforcement. One round sparked and ricocheted in front of officers. Officer A believed the officer in front of him had been hit. STALLINGS then ran and took cover behind the truck. Officers then exited the van and went to locate STALLINGS.

Officers fanned out and approached the truck from both sides. Officers treated this as a deadly force situation as they believed STALLINGS was still armed and could kill them. Officer A yelled for STALLINGS to stay on the ground. Officer A kicked him once he reached him as he did not know where the gun was located. Officer A did this in an attempt to gain control. STALLINGS did not stay on the ground and attempted to get up. Officer A continued to use physical force. STALLINGS did not comply and resisted. Eventually, Officer A was able to gain control of STALLINGS.

As STALLINGS was handcuffed, Officer A observed an AK-47 style Mini Draco Style pistol near the right bumper of the truck.

Officer A said after this incident, he had pain in his hand and foot. Officer A went for x-rays and learned nothing was broken. STALLINGS was also medically cleared before being transported to jail.

Officer B was also part of this same patrol. Officer B observed the individuals in the parking lot and observed STALLINGS near the truck, firing at Officers. Officer B also deployed one 40 mm shot at STALLINGS. Officer B observed STALLINGS fire three to four shots from hip level at law enforcement. Officer B saw STALLINGS being taken into custody. Officer B said he feared for his life during this incident and believed his partner had been shot.

Two other individuals were also located hiding near the truck. One of the other individuals was identified as KEARSTEN MARIE WALLIN (D.O.B. 10-2-1987) (hereinafter "WALLIN"). WALLIN gave a Mirandized statement to Sgts. Jensen and Heyer. WALLIN said she lives in St. Paul and came to Minneapolis around 4:00 p.m. to help with clean-up efforts. WALLIN said she was waiting in the area for a ride home and began to talk with several people she did not know. WALLIN said she was in the parking lot, heard gunfire and laid on the ground. WALLIN denied knowing anyone with a gun.

The other individual was identified as VIRGIL LEE JACKSON, JR. (D.O.B. 12-24-1993) (hereinafter "JACKSON"). Sgts. Jensen and Heyer took a Mirandized statement from JACKSON. JACKSON admitted violating the curfew order. JACKSON told law enforcement he was in the area checking on a school where he works. JACKSON later said he lives in St. Paul but has a business on Lake Street and wanted to get to the area to protect his business. JACKSON said he was hanging out in the area with 5 to 6 individuals that he did not know. JACKSON said he saw law enforcement come into the parking lot and heard the shots fired. JACKSON denied knowing anything about the gun or the person firing the gun. JACKSON said he observed a rifle type gun on the ground near the truck. Later on in the interview, JACKSON reported that he heard the shots while running away from the parking lot.

On May 31, 2020, Sgts. Jensen and Heyer took a Mirandized statement from STALLINGS. STALLINGS asked if anyone had been killed. STALLINGS was told no. STALLINGS then said he wanted to speak with a lawyer and the statement was ended.

Body worn camera footage was reviewed of the incident. The footage corroborates Officers A and B's statements to law enforcement. STALLINGS, WALLIN and JACKSON could all be identified in the video. Officers A and B also confirmed the identities of STALLINGS and WALLIN as being involved in this incident.

All of the above occurred in Hennepin County, Minnesota. STALLINGS, WALLIN and JACKSON are all 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

James R Jensen
Sergeant
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 3282

Electronically Signed:
06/02/2020 09:56 AM
Hennepin County, Minnesota

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

Prosecuting Attorney

Erin C. Stephens
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
06/02/2020 09:51 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 the address listed on the attached court summons 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: \$500,000.00

Conditions of Release: No Contact with Co-Defendant(s); No Possession of Weapons; Make All Appearances; Remain Law Abiding

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: June 2, 2020.

Judicial Officer

Luis Bartolomei
District Court Judge

Electronically Signed: 06/02/2020 10:02 AM

Sworn testimony has been given before the Judicial Officer by the following witnesses:

**COUNTY OF HENNEPIN
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

JALEEL KEVIN STALLINGS

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: JALEEL KEVIN STALLINGS
DOB: 08/10/1992
Address: 752 LAFOND
St. Paul, MN 55104

Alias Names/DOB:

SID: MN20CE1986

Height:

Weight:

Eye Color:

Hair Color:

Gender: MALE

Race: Black

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: Yes

Driver's License #:

SILS Person ID #: 880255

SILS Tracking No. 3174077

Case Scheduling Information: In Custody Co-Defendants:
WALLIN, KEARSTEN MARIE 20A06638
JACKSON, VIRGIL LEE Jr 20A06639
Complaints coming in addition to this complaint.

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	5/30/2020	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2817	A	MN0271100	20146953
	Modifier	5/30/2020	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2817	A	MN0271100	20146953
	Penalty	5/30/2020	609.19.1 Murder - 2nd Degree	Felony	H2817	A	MN0271100	20146953
	Penalty	5/30/2020	609.17.4(2) Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended	Felony	H2817	A	MN0271100	20146953
2	Charge	5/30/2020	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2817	A	MN0271100	20146953
	Modifier	5/30/2020	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2817	A	MN0271100	20146953
	Penalty	5/30/2020	609.19.1 Murder - 2nd Degree	Felony	H2817	A	MN0271100	20146953
	Penalty	5/30/2020	609.17.4(2) Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended	Felony	H2817	A	MN0271100	20146953
3	Charge	5/30/2020	609.221.2(a) Assault-1st Degree-Use of deadly force against peace officer/prosecutor/judge or correction employee	Felony	A1G27	A	MN0271100	20146953
	Penalty	5/30/2020	609.221.2(a) Assault-1st Degree-Use of deadly force against peace officer/prosecutor/judge or correction employee	Felony	A1G27	A	MN0271100	20146953
	Penalty	5/30/2020	609.221.2(b) Assault-1st Degree-Use of deadly force - mandatory minimum - penalty	Felony	A1G27	A	MN0271100	20146953
	Penalty	5/30/2020	609.17.4(2) Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended	Felony	A1G27	A	MN0271100	20146953
	Definition	5/30/2020	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A1G27	A	MN0271100	20146953
4	Charge	5/30/2020	609.221.2(a) Assault-1st Degree-Use of deadly force against peace officer/prosecutor/judge or correction employee	Felony	A1G27	A	MN0271100	20146953
	Penalty	5/30/2020	609.221.2(a) Assault-1st Degree-Use of deadly force against peace officer/prosecutor/judge or correction employee	Felony	A1G27	A	MN0271100	20146953
	Penalty	5/30/2020	609.221.2(b) Assault-1st Degree-Use of deadly force - mandatory minimum - penalty	Felony	A1G27	A	MN0271100	20146953
	Penalty	5/30/2020	609.17.4(2) Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended	Felony	A1G27	A	MN0271100	20146953
	Definition	5/30/2020	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A1G27	A	MN0271100	20146953
5	Charge	5/30/2020	609.222.1	Felony	A2327		MN0271100	20146953

	Definition	5/30/2020	Assault-2nd Degree-Dangerous Weapon 609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A2327	MN0271100	20146953
	Penalty	5/30/2020	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	A2327	MN0271100	20146953
	Penalty	5/30/2020	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2327	MN0271100	20146953
6	Charge	5/30/2020	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2327	MN0271100	20146953
	Definition	5/30/2020	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A2327	MN0271100	20146953
	Penalty	5/30/2020	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	A2327	MN0271100	20146953
	Penalty	5/30/2020	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2327	MN0271100	20146953
7	Charge	5/30/2020	609.71.2 Riot-2nd Degree-Armed w/Dangerous Weapon	Felony	N1010	MN0271100	20146953
	Penalty	5/30/2020	609.71.2 Riot-2nd Degree-Armed w/Dangerous Weapon	Felony	N1010	MN0271100	20146953
8	Charge	5/30/2020	609.66.1a(a)(2) Dangerous Weapons-Intentional Discharge of Firearm That Endangers Safety	Felony	W124A	MN0271100	20146953