
State of Minnesota,

COMPLAINT

Plaintiff,

Warrant

vs.

TRACEE CHUNG DOB: 03/31/1982

8041 MORGAN CIRCLE
BROOKLYN PARK, MN 55444

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: Drugs - 1st Degree - Sale - 50 Kilos or More Marijuana/25 KG in Zone

Minnesota Statute: 152.021.1(4), with reference to: 152.021.3(b), 609.05.1, 609.101.3

Maximum Sentence: 40 YEARS AND/OR \$300,000-\$1,000,000

Offense Level: Felony

Offense Date (on or about): 06/20/2014

Control #(ICR#): 14029540

Charge Description: That on or about June 20, 2014, in Hennepin County, Minnesota, TRACEE CHUNG while acting alone or intentionally aiding, advising, hiring, counseling or conspiring with Sluem Prodfuang and Leslie Wayne Cambell, unlawfully sold, gave away, bartered, delivered, exchanged, distributed, disposed of to another, offered to sell, agreed to sell, manufactured or possessed with intent to sell one or more mixtures of a total weight of 50 kilograms or more containing marijuana or tetrahydrocannabinols, and TRACEE CHUNG has a prior disposition for a felony-level offense under section 152.18, subd. 1, or felony conviction under chapter 152 or similar statute of another jurisdiction.

Minimum Sentence: 4 YEARS

STATEMENT OF PROBABLE CAUSE

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

On June 19, 2014, Brooklyn Park Police officers were dispatched to a residence on the 8040 block of Morgan Circle North in Brooklyn Park, Hennepin County, Minnesota on the report of suspected narcotics activity by a concerned citizen whose identity is known to law enforcement. Officers were familiar with this address from prior narcotics complaints and related investigations. The concerned citizen saw excessive amounts of short term traffic occurring after a van bearing Washington license plates arrived at that residence. The concerned citizen also saw garbage bags that appeared to be filled with brick shaped objects being loaded into vehicles. Further, the concerned citizen reported that a white male, whom he has seen before, just left the residence carrying a duffel bag that he placed in the trunk of his vehicle. Officers arrived and saw two vehicles leaving the residence – a black sports car and a silver Cadillac.

A traffic stop was conducted on the silver Cadillac, and LESLIE WAYNE CAMPBELL, DEFENDANT CAMPBELL herein, was identified as the driver. In speaking with Defendant Campbell, officers noticed the odor of fresh marijuana coming from his vehicle. In a subsequent search of Defendant Campbell's vehicle, officers located a duffel bag in the trunk that contained 20 plastic bags of suspected marijuana. Defendant Campbell was placed under arrest.

While officers were conducting the stop of Defendant Campbell, SLEUM PRODFUANG, DEFENDANT PRODFUANG herein, drove towards the stop location, and then took off at a high rate of speed in a black sports car. A traffic stop was eventually conducted. As officers approached Defendant Prodfuang, he put his vehicle into reverse, and almost struck a police vehicle. A pat search of Defendant's person was conducted, and officers recovered \$8,691 cash from the Defendant's pocket. In a subsequent search of Defendant Prodfuang's vehicle, officers recovered an additional \$28,100 cash from the trunk. Defendant Prodfuang was also placed under arrest.

Subsequent to the arrest of Defendants Prodfuang and Campbell, officers executed a search warrant at the same address on the 8040 block of Morgan Circle North in Brooklyn Park, Hennepin County, Minnesota on June 20, 2014. While conducting surveillance prior to the execution of the warrant, TRACEE CHUNG, DEFENDANT CHUNG herein, arrived at the address. Defendants Prodfuang and Chung are residents of this address. Defendant Chung was detained, and provided officers with a key to enter the address. Pursuant to the search warrant, officers recovered 56 large plastic bags in the basement living room, 68 large plastic bags in the basement bedroom, 30 large plastic bags in the garage, and 69 large plastic bags in a rental van bearing Washington license plates in the garage all containing large quantities of suspected marijuana. An additional bag containing suspected marijuana wax was located in the garage. Officers also located a digital scale, packaging materials, drug note ledgers, documents bearing Defendants Prodfuang and Chung's names, and \$6,664 in cash in this residence.

The suspected marijuana located in Defendants Prodfuang and Chung's residence field tested positive for THC, weighing 103,416.6 grams (227.99 pounds or 103.42 kilograms). The suspected marijuana located in the trunk of Defendant Campbell's vehicle field tested positive for THC, weighing 9,022.3 grams (19.8 pounds or 9 kilograms). In Complainant's training and experience, these quantities of marijuana are inconsistent with personal use.

Defendant Campbell was advised of his rights pursuant to Miranda, and when asked what was recovered from the trunk of his vehicle, he stated, "20." He went onto tell officers that, "If I were to get out of here and have my things back, you'd never find anything like that again."

Defendant Prodfuang has a prior controlled substance crime conviction for Fifth Degree Sale from

September 2012 for which he is currently on probation (71-CR-11-1848).

Defendant Chung has a prior controlled substance crime conviction for Fifth Degree Possession from November 2011(71-CR-11-693).

Pursuant to Minnesota Rule of Criminal Procedure 3.01, the State is requesting that these complaints issue as warrants for the following reasons: 1) the current whereabouts of Defendants Prodfuang and Chung are unknown and thus, the State is unable to mail either a summons; 2) Defendant Campbell has three active warrants for failing to appear for court indicating an unwillingness to respond to a summons; and 3) given the severity of these offenses and the mandatory prison sentences for Defendants Prodfuang, and Chung, it is unlikely that these Defendants will respond to a summons.

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

Desmond Daniels
Detective
5400 85th Ave N
Brooklyn Park, MN 55443
Badge: 192

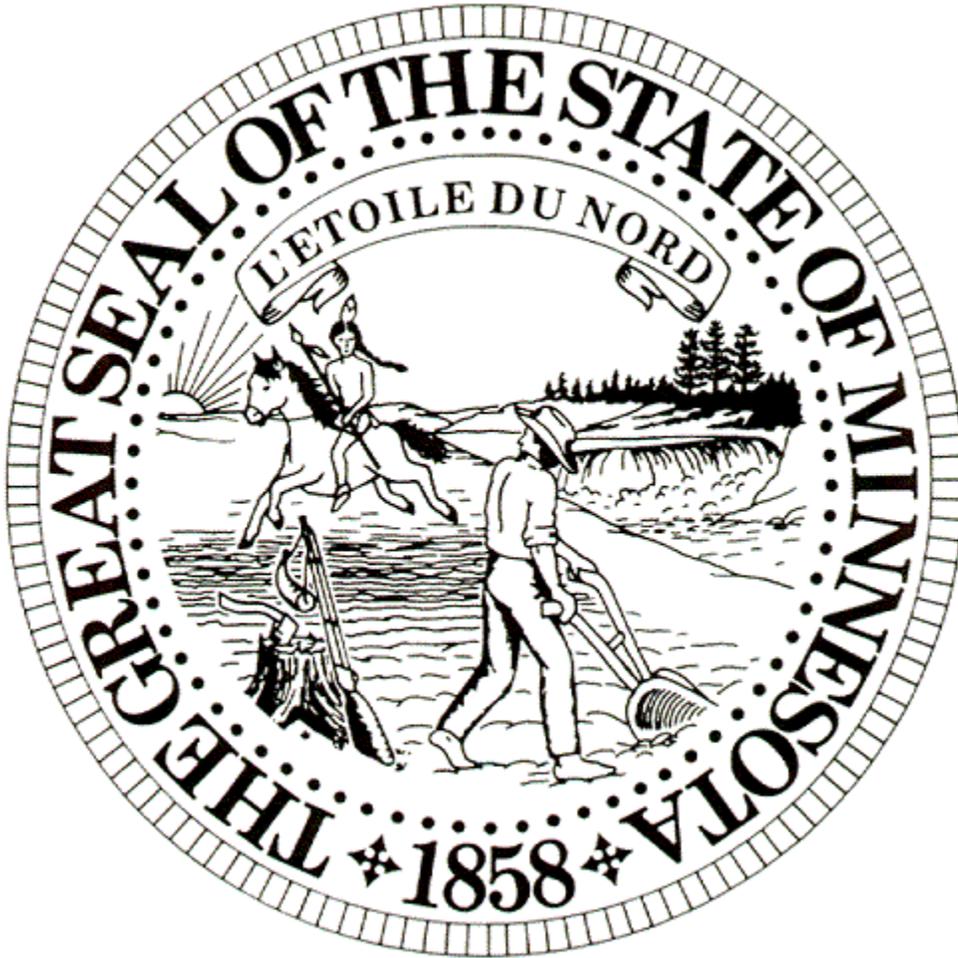
Electronically Signed:
07/18/2014 04:28 PM

Subscribed and

Notary Public (
Judicial Office

Being authorize

Prosecuting At



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: \$100,000.00

Conditions of Release:

This complaint is issued by the undersigned Judge as of the following date: July 21, 2014.

Judicial Officer

Ivy S. Bernhardson
Judge of District Court

Electronically Signed: 07/21/2014 07:50 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.

TRACEE CHUNG

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: