

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 16A12087
Court File No. 27-CR-16-26893

State of Minnesota,

Plaintiff,

vs.

JQUAN LEEARTHUR MCINNIS DOB: 03/17/1999

2915 3RD ST N #1
Minneapolis, MN 55411

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 -1st Degree - Premeditated

Minnesota Statute: 609.185(a)(1), with reference to: 609.11.5(a), 609.185

Maximum Sentence:

Offense Level: Felony

Offense Date (on or about): 10/09/2016

Control #(ICR#): 16367327

Charge Description: That on or about 10/9/2016, in Minneapolis, Hennepin County, Minnesota, JQUAN LEEARTHUR MCINNIS , caused the death of GC, a human being, with premeditation and with intent to effect the death of that person, or another, while using a firearm.

COUNT II

Charge: Murder -1st Degree - Premeditated

Minnesota Statute: 609.185(a)(1), with reference to: 609.11.5(a), 609.185

Maximum Sentence:

Offense Level: Felony

Offense Date (on or about): 10/09/2016

Control #(ICR#): 16367327

Charge Description: That on or about 10/9/2016, in Minneapolis, Hennepin County, Minnesota, JQUAN LEEARTHUR MCINNIS , caused the death of JR, a human being, with premeditation and with intent to effect the death of that person, or another, while using a firearm.

COUNT III

Charge: Murder-1st Degree - With Intent - While Committing a Felony

Minnesota Statute: 609.185(a)(3), with reference to: 609.11.5(a), 609.185

Maximum Sentence:
Offense Level: Felony

Offense Date (on or about): 10/09/2016

Control #(ICR#): 16367327

Charge Description: That on or about 10/9/2016, in Minneapolis, Hennepin County, Minnesota, JQUAN LEEARTHUR MCINNIS , caused the death of GC, a human being, with intent to effect the death of GC or another, while committing or attempting to commit the crime of drive-by shooting while using a firearm.

COUNT IV

Charge: Murder-1st Degree - With Intent - While Committing a Felony

Minnesota Statute: 609.185(a)(3), with reference to: 609.11.5(a), 609.185

Maximum Sentence:

Offense Level: Felony

Offense Date (on or about): 10/09/2016

Control #(ICR#): 16367327

Charge Description: That on or about 10/9/2016, in Minneapolis, Hennepin County, Minnesota, JQUAN LEEARTHUR MCINNIS , caused the death of JR, a human being, with intent to effect the death of JR or another, while committing or attempting to commit the crime of drive-by shooting while using a firearm.

STATEMENT OF PROBABLE CAUSE

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

On October 9, 2016, Minneapolis police were dispatched to a shooting at 26th Street East and 11th Avenue South, Minneapolis, Hennepin County, Minnesota.

Officers arrived and observed a male victim, subsequently identified as adult male GC, lying in a nearby driveway. Two paramedics had been nearby at the time of the shooting and had tried to render aid to GC, but GC was dead at the scene from apparent gunshot wounds.

GC was lying near a car that had the rear window shot out. Officers learned that an eight month old baby, subsequently identified as JR, had been sitting in a baby seat inside the car and had also been hit by gunshots. The baby's father had lifted the baby seat out of the car with JR in it and had taken the baby to Children's Hospital, which was just two blocks away.

Officers went to hospital and learned that JR had also died from apparent gunshot wounds.

Numerous witnesses reported that they had seen the shooter, described as a young black male wearing a blue hoodie. Witnesses reported that as GC was in the back of the car, the suspect wearing the blue hoodie started shooting into the back seat of the car and then walked around to the back of the car and fired again into the back window of the car.

Witnesses reported that gunman wearing a bright blue hoodie had run northbound in the alley after shooting into the car.

Officers walked the route that the gunman had run and found a blue hoodie in a garbage can near 25th Street East and 11th Avenue South.

Officers also recovered numerous discharged cartridge casings at the scene near the body of GC.

Based on witness interviews, officers developed JQUAN LEEARTHUR MCINNIS, hereinafter Defendant, as a suspect in the homicides.

Defendant was located and arrested. In a taped, post-Miranda statement, Defendant admitted that on October 9, 2016, he was in car in near 26th Street and 11th Avenue in Minneapolis when he saw adult male GC. Defendant stated he had a prior dispute with GC and circled the block. Defendant admitted that he got out of the car, crossed through some back yards and approached GC. Defendant admitted he had a gun and shot GC as GC was seated in the back of the car. Defendant stated he did not know there was a baby in the car at the time he shot GC. Defendant stated that after shooting GC he ran back through the yards to get to the car. Defendant admitted that he had been wearing a blue hoodie and had discarded it as he ran.

THE DEFENDANT IS SEVENTEEN (17) YEARS OF AGE. PURSUANT TO MINN. STAT. §609.055, SUBD. 2(b), AND MINN.R.JUV.PROC. 18.01, SUBD. 2, DEFENDANT IS AUTOMATICALLY SUBJECT TO ADULT COURT JURISDICTION.

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

Darcy Klund
SERGEANT
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 3728

Electronically Signed:
10/13/2016 12:05 PM
Hennepin County, MN

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

Prosecuting Attorney

Mark Griffin
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
10/13/2016 12:03 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 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: \$2,000,000.00
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: October 13, 2016.

Judicial Officer

Janet Poston
District Court Judge

Electronically Signed: 10/13/2016 12:08 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.

JQUAN LEEARTHUR MCINNIS

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: