

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 17A06439  
Court File No. 27-CR-17-12997

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**State of Minnesota,**  
Plaintiff,

**COMPLAINT**  
Order of Detention

vs.

**NICHOLAS ALONZO JEFFERSON DOB: 12/23/1985**

5760 33rd Ave S  
Apt 4  
Minneapolis, MN 55417

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: 609.11.5(a), 609.19.1

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 05/12/2017

Control #(ICR#): 17172827

Charge Description: That on or about 5/12/2017, in Hennepin County, Minnesota, NICHOLAS ALONZO JEFFERSON, caused the death of victim, 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:

That on May 12, 2017, at approximately 3:18 p.m., officers were dispatched to a parking lot located near Lyndale and Broadway Avenues in Minneapolis, Hennepin County, Minnesota, to investigate a shooting. Upon arrival, officers located an identified adult female, hereafter victim, lying on the pavement presenting with a gunshot wound. Victim was transported to a hospital where she was pronounced dead.

Officers spoke with numerous witnesses and learned victim had been feuding with her boyfriend, MARVEL GALVASTON WILLIAMS. Officers learned the confrontation took victim and WILLIAMS next to a vehicle where two acquaintances of WILLIAMS were present. These acquaintances were identified as NICHOLAS ALONZO JEFFERSON, hereafter defendant, and an identified adult male, hereafter Witness #3.

Officers spoke with an identified female, hereafter Witness #1. Witness #1 reported victim and WILLIAMS have dated and were feuding recently. Witness #1 reported she was with victim at a business near the above-described parking lot. Witness #1 reported WILLIAMS entered the business and began to argue with victim. Victim was holding an infant at the time. WILLIAMS demanded victim put down the infant. Victim refused, fearing she would be assaulted by WILLIAMS. Witness #1 reported WILLIAMS proceeded to punch victim in the face regardless and take victim's cell phone. Witness #1 reported victim put down the infant, pursued WILLIAMS into the parking lot, and maced him. Witness #1 reported this part of the confrontation took WILLIAMS and victim into the parking lot near a vehicle stopped in the aisles. Witness #1 reported she observed victim was shot from a party inside the stopped vehicle. Witness #1 indicated the shot came from the passenger side of the vehicle.

Officers spoke with an identified male, hereafter Witness #2. Witness #2 reported he is acquainted with WILLIAMS and victim. Witness #2 reported he observed WILLIAMS and victim feuding in the parking lot. He reported hearing victim demanding her phone back and observed WILLIAMS had been maced. Witness #2 reported hearing WILLIAMS inform victim he was going to shoot her. Witness #2 heard victim tell WILLIAMS he would go to jail if he did so. Witness #2 then heard WILLIAMS say "Man, shoot this bitch" as they were near a stopped vehicle in the parking lot. Witness #2 reported another individual inside the vehicle then shot victim from the passenger side.

Officers located and spoke with Witness #3. Witness #3 reported he contacted WILLIAMS to purchase narcotics. He indicated he met WILLIAMS in the above-described parking lot and observed defendant was also present in the vehicle. He indicated WILLIAMS left the vehicle and WILLIAMS directed him to conduct the narcotics transaction with defendant. Witness #3 reported defendant was now seated in the driver's seat of the vehicle and that he was in the front passenger seat. Witness #3 reported he observed WILLIAMS and victim go past the vehicle while arguing. Witness #3 reported he heard defendant ask WILLIAMS what WILLIAMS wanted him to do and WILLIAMS responded, shoot her. Witness #3 reported defendant then rolled down the front passenger window, reached across from the driver's seat, pointed a handgun out the front passenger window, and shot victim. Witness #3 reported that at the time of the shooting, only he and defendant were inside the vehicle.

Officers obtained and reviewed surveillance footage from a nearby business. This surveillance footage corroborated these witness accounts.

Officers located and spoke with defendant. Defendant admitted he arrived at the parking lot with WILLIAMS and that they went there so WILLIAMS could confront victim. Defendant admitted WILLIAMS

exited the vehicle and Witness #3 entered the vehicle for a narcotics transaction. Defendant admitted he moved to the driver's seat of the vehicle. Defendant also admitted hearing WILLIAMS say, "Pop that bitch" but claimed another individual inside the vehicle shot the victim.

At present, defendant is 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**

Chris Karakostas  
Sgt  
350 S 5th St  
Minneapolis, MN 55415-1389  
Badge: 3636

Electronically Signed:  
05/26/2017 12:24 PM  
Hennepin County, Minnesota

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

**Prosecuting Attorney**

Darren Borg  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
05/26/2017 12:20 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 300 S Sixth Street, Minneapolis, MN 55487 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, duly subscribed and sworn to or signed under penalty of perjury, is issued by the undersigned Judicial Officer as of the following date: May 26, 2017.

**Judicial Officer**

Liza K. Janzen  
District Court Judge

Electronically Signed: 05/26/2017 12:33 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.

**NICHOLAS ALONZO JEFFERSON**

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: