

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 18A07390
Court File No. 27-CR-18-16026

State of Minnesota,

Plaintiff,

vs.

SILAS TIMOTHY MCDOUGAL DOB: 11/10/1998

304 26th AVE N
Minneapolis, MN 55411

Defendant.

COMPLAINT

Warrant

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), 609.05.1, 609.05.2, 609.19.1

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 05/17/2018

Control #(ICR#): 18001688

Charge Description: That on or about 5/17/2018, in Richfield, Hennepin County, Minnesota, SILAS TIMOTHY MCDOUGAL, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another or otherwise procures the other to commit the crime caused the death of J.W., 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, a licensed peace officer with the Richfield Police Department, has investigated the facts and circumstances of this offense and believes the following establishes probable cause:

On May 17, 2018, Richfield Police Officers were dispatched to the parking lot of an apartment complex at 1318 E. 78th Street in Richfield, Hennepin County, Minnesota, on a suspicious vehicle call. Upon arrival, officers located an injured male inside the vehicle, who had been shot and was bleeding. The injured party was identified as J.W. J.W. was transferred to the hospital via ambulance. J.W. later died at the hospital as a result of the gunshot wound to the head.

Officers did a quick search of the vehicle and located blood, a discharged cartridge casing, and items consistent with the sale of marijuana. A canvas of the neighborhood led to the discovery of a witness, hereinafter referred to as Witness A. Witness A reported hearing a gun shot and then seeing two suspects on the passenger side of the vehicle. Witness A reported that two male suspects ran westbound through the parking lot towards the garages.

Another witness reported seeing four males near the dumpsters at Baymont Inn about 30 minutes before the shooting. Officers obtained surveillance video from the Baymont Inn. The video shows four males. Shortly after the 911 call, suspects 1 and 2 are observed jumping over the fence located between the hotel and the northwest side of the apartment complex. Moments later suspects 3 and 4 also jump the fence.

Officers searched the area of the shooting and located three backpacks under a stairwell in one of the apartment buildings. Officers located a credit card application in the name of SILAS TIMOTHY MCDUGAL, the defendant herein, in one of the backpacks.

As part of the investigation, Crime Lab collected latent prints from the victim's vehicle. A palm print was recovered from the outside of the front passenger door window. The palm print was a match for the defendant.

Investigation led to officers speaking with a known adult, Witness B. Witness B reported that on May 17, 2018, he met up with the defendant, along with Daniel Adams and T.B. Witness B reported they eventually headed toward the apartment complex in question. Witness B reported that the defendant said J.W. shorted him some marijuana and that he wanted to "beat his ass". Witness B stated that once they arrived, he dropped his backpack and the defendant and T.B. did so as well. Witness B reported that he was with T.B. and they started walking towards the victim's vehicle and he saw the defendant in the front passenger seat and the victim in the driver's seat. Witness B stated that he heard a gunshot, saw the defendant exit the vehicle and then Witness B ran towards the Baymont Inn. According to Witness B, he heard others running behind him.

Witness B reviewed the surveillance video and was able to identify himself, Adams, T.B. and the defendant as the individuals jumping the fence.

Text messages, from May 17th, between the defendant and Witness B appear to discuss finding individuals to rob.

The defendant is currently in custody on another matter.

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

Brian Rogge
Police Officer
6700 Portland Avenue S
Richfield, MN 55423
Badge: 148

Electronically Signed:
06/25/2018 06:59 AM
Hennepin County, Minnesota

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

Prosecuting Attorney

Dan Allard
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
06/22/2018 03:45 PM

DEFENDANT FACT SHEET

Name: SILAS TIMOTHY MCDUGAL
DOB: 11/10/1998
Address: 304 26th AVE N
Minneapolis, MN 55411

Alias Names/DOB:
SID:
Height:
Weight:
Eye Color:
Hair Color:
Gender: MALE
Race: Black
Fingerprints Required per Statute: Yes
Fingerprint match to Criminal History Record: No
Driver's License #:
SILS Person ID #: 810185
SILS Tracking No. 3019873
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	5/17/2018	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2012	X	MN0271800	18001688
	Modifier	5/17/2018	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	H2012	X	MN0271800	18001688
	Penalty	5/17/2018	609.19.1 Murder - 2nd Degree	Felony	H2012	X	MN0271800	18001688
	Penalty	5/17/2018	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2012	X	MN0271800	18001688
	Modifier	5/17/2018	609.05.1 Liability for Crimes of Another-Intentional	No-Level	H2012	X	MN0271800	18001688