

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 18A15380  
Court File No. 27-CR-18-30778

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**State of Minnesota,**

Plaintiff,

vs.

**PATRICE MARIE THOMAS DOB: 11/22/1988**

6426 36th Ave N  
Minneapolis, MN 55427

Defendant.

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**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: Kidnapping-To Facilitate Felony or Flight**

Minnesota Statute: 609.25.1(2), with reference to: 609.25.2(2), 609.11.5(a)

Maximum Sentence: 40 YEARS AND/OR \$50,000

Offense Level: Felony

Offense Date (on or about): 12/16/2018

Control #(ICR#): 18410759

Charge Description: That on or about 12/16/2018, in Hennepin County, Minnesota, PATRICE MARIE THOMAS confined victim from one place to another without her consent, in order to facilitate commission of a felony or flight thereafter, and D.F. was not released in a safe place while using a firearm.

**COUNT II**

**Charge: Kidnapping-To Commit Great Bodily Harm/Terrorize**

Minnesota Statute: 609.25.1(3), with reference to: 609.25.2(2), 609.11.5(a)

Maximum Sentence: 40 YEARS AND/OR \$50,000

Offense Level: Felony

Offense Date (on or about): 12/16/2018

Control #(ICR#): 18410759

Charge Description: That on or about 12/16/2018, in Hennepin County, Minnesota, PATRICE MARIE THOMAS confined D.F. from one place to another without her consent, in order to terrorize her, and D.F. was not released in a safe place, while using a firearm.

Minimum Sentence: 3 YEARS

**COUNT III**

**Charge: Assault-2nd Degree-Dangerous Weapon**

Minnesota Statute: 609.222.1, with reference to: 609.222.1, 609.11.5(a), 609.05.1, 609.05.2, 609.101.2

Maximum Sentence: 7 YEARS AND/OR \$4,200-\$14,000

Offense Level: Felony

Offense Date (on or about): 12/16/2018

Control #(ICR#): 18410759

Charge Description: That on or about 12/16/2018, in Hennepin County, Minnesota, PATRICE MARIE THOMAS, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with A.J. or otherwise procures the other to commit the crime, assaulted D.F., 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:

On or about December 16, 2018, officers with the Minneapolis Police Department responded to a reported kidnapping. Upon arrival, officers spoke with witness K.R. K.R. informed officers that he was walking with the adult female victim D.F., Victim herein, near the intersection of Broadway and Emerson Avenue North, Minneapolis, Hennepin County, Minnesota when they noticed a blue Dodge Durango following them. K.R. and Victim got nervous because Victim feared retaliation due to a prior incident. K.R. and Victim began to walk to a nearby McDonalds because they knew McDonalds typically had a security guard working and video surveillance. Once in the parking lot of McDonalds, ANDRE DONNELL JACKSON JR., Co-Defendant herein, and PATRICE MARIE THOMAS, Defendant herein, exited the Durango and approached Victim. K.R. saw the Defendant had a handgun in her waistband. Co-Defendant immediately assaulted the victim by punching her in the head while the Defendant yelled at Victim. Defendant and Co-Defendant then grabbed Victim and forcibly dragged Victim into the Durango. Defendant and Co-Defendant then drove off with Victim in the Durango.

Officers subsequently responded to a known address on Emerson Avenue, Minneapolis, Hennepin County, Minnesota on the report of an assault. Upon arrival, officers found Victim and observed she had a gunshot wound to her left shoulder and several injuries to her face and head. Victim identified Defendant and Co-Defendant as her assailants. Victim informed officers that she knows both Defendant and Co-Defendant. Victim was walking down the street with K.R. Victim noticed the Durango following them. Defendant and Co-Defendant exited the Durango and approached Victim. Defendant and Co-Defendant then forcibly placed Victim in the Durango. Victim reported that after she was in the Durango, Defendant handed Co-Defendant a handgun and Co-Defendant began to strike Victim with the handgun in the face and head. Defendant was driving the vehicle and yelling at Victim while the Co-Defendant was assaulting her. Victim then jumped from the moving vehicle to escape.

Officers spoke to Victim at the hospital. Victim reported Co-Defendant shot her as she was attempting to escape. Victim heard Defendant yell to Co-Defendant that he had to shoot her.

In a post Miranda interview, Co-Defendant admitted punching Victim in the McDonalds parking lot, holding her down in the back of the Durango, pulling a handgun on her, and shooting her as she escaped the Durango.

In a post Miranda interview, Defendant admitted Victim was in the Durango while she drove, that Co-Defendant had a gun when Victim was in the car, and hearing a gunshot.

Officers reviewed video surveillance footage that shows Co-defendant punch Victim and Defendant and Co-Defendant forcibly drag Victim into the Durango.  
Your Complainant is aware 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**

Scott A Olson  
Sergeant  
350 S 5th St  
Minneapolis, MN 55415-1389  
Badge: 5315

Electronically Signed:  
12/19/2018 11:40 AM  
Hennepin County, Minnesota

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

**Prosecuting Attorney**

Jason Heaser  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
12/19/2018 11:35 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 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: \$100,000.00

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: December 19, 2018.

**Judicial Officer**

Jeannice M. Reding  
District Court Judge

Electronically Signed: 12/19/2018 11:52 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.

**PATRICE MARIE THOMAS**

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:** PATRICE MARIE THOMAS  
**DOB:** 11/22/1988  
**Address:** 6426 36th Ave N  
Minneapolis, MN 55427

**Alias Names/DOB:**

**SID:** MN12F03548

**Height:**

**Weight:**

**Eye Color:**

**Hair Color:**

**Gender:** FEMALE

**Race:** Black

**Fingerprints Required per Statute:** Yes

**Fingerprint match to Criminal History Record:** Yes

**Driver's License #:**

**SILS Person ID #:** 662620

**SILS Tracking No.** 3072800

**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	12/16/2018	609.25.1(2) Kidnapping-To Facilitate Felony or Flight	Felony	K1222		MN0271100	18410759
	Penalty	12/16/2018	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	K1222		MN0271100	18410759
	Penalty	12/16/2018	609.25.2(2) Kidnap-Not Release Safe Place-Great Bodily Harm or U/16 - Sentence	Felony	K1222		MN0271100	18410759
2	Charge	12/16/2018	609.25.1(3) Kidnapping-To Commit Great Bodily Harm/Terrorize	Felony	K3322		MN0271100	18410759
	Penalty	12/16/2018	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	K3322		MN0271100	18410759
	Penalty	12/16/2018	609.25.2(2) Kidnap-Not Release Safe Place-Great Bodily Harm or U/16 - Sentence	Felony	K3322		MN0271100	18410759
3	Charge	12/16/2018	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2222	X	MN0271100	18410759
	Modifier	12/16/2018	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	A2222	X	MN0271100	18410759
	Definition	12/16/2018	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A2222	X	MN0271100	18410759
	Modifier	12/16/2018	609.05.1 Liability for Crimes of Another-Intentional	No-Level	A2222	X	MN0271100	18410759
	Penalty	12/16/2018	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2222	X	MN0271100	18410759
	Penalty	12/16/2018	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	A2222	X	MN0271100	18410759