

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 19A15688
Court File No. 27-CR-19-31321

State of Minnesota,

Plaintiff,

vs.

TYREIK LEVEL PERKINS DOB: 03/20/1999

2755 Rice St Apt 330
Roseville, MN 55113

Defendant.

COMPLAINT

Summons

Amended

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: Aiding an Offender - Accomplice After the Fact

Minnesota Statute: 609.495.3, with reference to: 609.495.3

Maximum Sentence: 20 YEARS

Offense Level: Felony

Offense Date (on or about): 12/19/2019

Control #(ICR#): 19371533

Charge Description: That on or about 12/19/2019, in Hennepin County, Minnesota, Tyreik Larel Perkins aided James Tyjuan Moore, a person Tyreik Larel Perkins knew or had reason to know had committed a felony, byproviding false or misleading information about that crime.

COUNT II

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, 609.11.9

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 12/19/2019

Control #(ICR#): 19371533

Charge Description: That on or about 12/19/2019, in Hennepin County, Minnesota, Tyreik Lavel Perkins, 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 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

AMENDED COMPLAINT: THE OFFENSE PORTION HAS BEEN AMENDED TO ADD COUNT 2, MURDER – 2ND DEGREE – WITH INTENT--NOT PREMEDITATED. ADDITIONAL PROBABLE CAUSE LANGUAGE CAPITALIZED BELOW.

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

On December 19, 2019, Minneapolis police responded to a shooting on the 1700 block of Russell Avenue North. ShotSpotter recorded twelve shots. En route, police heard dispatch air that a caller also called to report gun shots at the corner of Golden Valley Road and Russell Avenue. The caller stated that he/she had seen two males firing a gun at a truck, and the truck and left south bound on Russell Avenue. The caller also stated that both males had run back into 2406 Golden Valley Road and into Apartment 104.

Police identified and contacted the 911 caller, hereinafter referred to as Witness 1. Officers verified with Witness 1 that no one had left Apartment 104 between when he/she observed the suspects enter and when police arrived.

Shortly after the shots fired call, at approximately 6:32 p.m., other officers who were responding to the shooting were directed to an SUV that had crashed into a tree in front of a residence on Russell Avenue North. Further remarks indicated that there was one occupant, a subsequently identified male, ("victim,") in the vehicle with gunshot wounds to the back. Officers arrived from the south of the incident location and observed a white SUV that had struck a tree on the east side of Russell Avenue North.

The victim was laying across the center of the vehicle face down and blood rushing out of his mouth. The victim was removed from the vehicle, and officers began rendering aid to the victim. The victim had two gunshot wounds to his back. EMS personnel arrived and took over treatment of the victim. The victim would later be pronounced dead as a result of being shot in the back.

Back at 2406 Golden Valley Road, officers had "frozen" the premises, and obtained a search warrant for Apartment 104. Prior to executing the warrant, police cleared Apartment 104 of two females and two children.

Officers began to yell instructions for any other occupants of Apt 104 to come out and show their hands. After about 30 seconds, a male later identified as TYREIK LAVEL PERKINS, DOB 03-20-99, came out to the hallway and was detained.

After another short delay a second male, later identified JAMES TYJUAN MOORE, DOB 5/01/1998, also came to the door and was also detained.

During the execution of the search warrant, hidden in a couch, police located two handguns, a .22 and a 9mm. They also located a pair of blue jeans on the floor with a black wallet. Inside the wallet officers located a Wisconsin ID card in the name of TYREIK LAVEL PERKINS. Police located a gun magazine with live rounds on the floor of a bedroom closet, and a single live round on the closet floor approximately one foot away from the magazine.

Investigators subsequently interviewed Witness 1. Witness 1 told them he/she had observed the two male suspects walked out the front/south door at 2406 Golden Valley Road, walked south across Golden Valley Road towards Russell Avenue North. The suspects walked up to a white truck that was parked facing

southbound on the east side of Russell Avenue North.

Witness 1 described the first suspect as a dark-skinned black male, approximately 5'4" to 5'6" tall, wearing a pink hoodie and red pants. (MOORE fits this description, and when police detained him at the apartment, he was wearing red pants. A pink jacket was later located inside the apartment). Witness 1 watched this suspect try to open the driver's door of the truck. This suspect pulled a gun out of his pocket and fired the gun two times at the driver's side of the truck. Witness 1 described the second suspect as standing behind the shooter when this happened.

Witness 1 indicated the second suspect was a heavy set, light-skinned black male, wearing a black jacket with the hood up. She also indicated he was slightly taller than the shooter. This fits the description of PERKINS, the only other male who was present with MOORE.

After the shots, the white truck drove off fast, southbound on Russell Avenue North. The Suspects ran back to the apartment.

Witness 1 stated that the Suspects returned to 2406 Golden Valley Road and entered the building through the front/south or back/north door. Once inside, Witness 1 heard the suspects enter Apartment #104, because he/she heard the door slam, and heard the suspects talking about what happened.

ON DECEMBER 22, 2019, INVESTIGATORS SPOKE WITH AN IDENTIFIED FEMALE, WITNESS 2. WITNESS 2 STATED THAT SHE RECEIVED INFORMATION ABOUT THIS HOMICIDE DIRECTLY FROM DESTINY BRADSHAW, A/K/A DESTINY LUCRETIA BRADSHAW.

BRADSHAW TOLD WITNESS 2 "EVERYTHING." WITNESS 2 INDICATED THAT BRADSHAW TALKED TO MOORE ABOUT ROBBING PEOPLE TO MAKE MONEY. BRADSHAW WAS GOING TO INBOX PEOPLE OFF OF BRADSHAW'S FACEBOOK PAGE AND ASK FOR MARIJUANA. THEIR THINKING WAS THAT SINCE BRADSHAW WAS A FEMALE, IT WOULD BE EASIER TO LURE MALES INTO THE AREA. BRADSHAW PROVIDED WITNESS 2 WITH SEVERAL OF THE NAMES OF THE MALES BRADSHAW MESSAGED, INCLUDING VICTIM'S NAME.

BRADSHAW DESCRIBED TO WITNESS 2 HOW, AFTER THE SHOOTING, PERKINS AND MOORE RAN BACK TO HER APARTMENT, WHERE BRADSHAW ASSISTED IN HIDING EVIDENCE.

PERKINS WAS INTERVIEWED AND admitted being at the apartment with MOORE, and claimed that MOORE lived there with his girlfriend. PERKINS claimed he and MOORE had been there for approximately two hours before the police arrived. PERKINS denied any knowledge of a shooting or any knowledge of the guns found in the apartment.

LATER, WITNESS 2 NOTIFIED INVESTIGATORS THAT PERKINS WISHED TO SPEAK WITH THEM A SECOND TIME. THIS TIME, PERKINS WAIVED HIS MIRANDA RIGHTS AND CONFIRMED THAT HE WAS WITH MOORE AT THE TIME OF THE SHOOTING BUT DID NOT FIRE A GUN. HOWEVER, PERKINS ADMITTED THAT HE WAS AWARE OF THE ROBBERY PLAN.

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

Charles D Green IV
Sergeant-Criminal Investigation
Division
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 2429

Electronically Signed:
06/17/2020 03:41 PM
Hennepin County, Minnesota

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

Prosecuting Attorney

Jacob Carl Fischmann
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
06/17/2020 03:35 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 the address listed on the attached court summons 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: \$5,000,000.00

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: June 17, 2020.

Judicial Officer

Luis Bartolomei
District Court Judge

Electronically Signed: 06/17/2020 03:55 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.

Tyreik Level Perkins

Defendant

LAW ENFORCEMENT OFFICER RETURN OF SERVICE
*I hereby Certify and Return that I have served a copy of this
Summons upon the Defendant herein named.*

Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

Name: Tyreik Lavel Perkins
DOB: 03/20/1999
Address: 2755 Rice St Apt 330
Roseville, MN 55113

Alias Names/DOB: Tyreik Larel Perkins DOB: 3/20/1999
SID: MN18AL7884

Height:
Weight:
Eye Color:
Hair Color:

Gender: MALE
Race: Black
Fingerprints Required per Statute: Yes
Fingerprint match to Criminal History Record: Yes

Driver's License #:
SILS Person ID #: 853243
SILS Tracking No. 3146741

Case Scheduling Information: AMENDED COMPLAINT: NEXT HEARING DATE: 6/22/20 9:00 AM [Person
Felony Omnibus - Omnibus Hearing GC-C1553] DEFENDANT
CURRENTLY OUT OF CUSTODY
date of next hearing w/in two weeks, can the court serve amended
Summons complaint at next court appearance upon defendant/defense
counsel

co-defendant is Moore, James Tyjuan 19A15687 Next Hearing Date
7/27/20 at 9:00 a.m. Contested Omnibus

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 | 12/19/2019 | 609.495.3 Aiding an Offender - Accomplice After the Fact | Felony | E1920 | | MN0271100 | 19371533 |
| | Penalty | 12/19/2019 | 609.495.3 Aiding an Offender - Accomplice After the Fact | Felony | E1920 | | MN0271100 | 19371533 |
| 2 | Charge | 12/19/2019 | 609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated | Felony | H2313 | X | MN0271100 | 19371533 |
| | Penalty | 12/19/2019 | 609.19.1 Murder - 2nd Degree | Felony | H2313 | X | MN0271100 | 19371533 |
| | Modifier | 12/19/2019 | 609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses | No-Level | H2313 | X | MN0271100 | 19371533 |
| | Modifier | 12/19/2019 | 609.05.2 Liability for Crimes of Another-Reasonably Forseeable | No-Level | H2313 | X | MN0271100 | 19371533 |
| | Penalty | 12/19/2019 | 609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession | Felony | H2313 | X | MN0271100 | 19371533 |
| | Modifier | 12/19/2019 | 609.05.1 Liability for Crimes of Another-Intentional | No-Level | H2313 | X | MN0271100 | 19371533 |