

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 22A00135
Court File No. 27-CR-22-353

State of Minnesota,

Plaintiff,

vs.

KAHLIL MARKELL WILEY DOB: 07/16/2003

286 Stinson St
St. Paul, MN 55117

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: Assault-2nd Degree-Dangerous Weapon

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

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

Offense Level: Felony

Offense Date (on or about): 12/31/2021

Control #(ICR#): 21012042

Charge Description: That on or about December 31, 2021, in the city of Bloomington, in Hennepin County, Minnesota, KAHLIL MARKELL WILEY, assaulted Victim 1, while using a firearm.

Minimum Sentence: 3 YEARS

COUNT II

Charge: Assault-2nd Degree-Dangerous Weapon

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

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

Offense Level: Felony

Offense Date (on or about): 12/31/2021

Control #(ICR#): 21012042

Charge Description: That on or about December 31, 2021, in the city of Bloomington, in Hennepin County, Minnesota, KAHLIL MARKELL WILEY, assaulted Victim 2, 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 December 31, 2021, officers with the Bloomington Police Department were dispatched to a report of shots fired on the 3rd floor of the Mall of America, located at 8100 24th Avenue South in the city of Bloomington, Hennepin County, Minnesota.

Upon arriving, officers located a known adult male, Victim 1, with a gunshot wound to his left leg. Victim 1 was treated by paramedics and transported to the Hennepin County Medical Center. In a subsequent statement, Victim 1 told investigators that he knew the suspect, later identified as KAHLIL MARKELL WILEY, DOB: 07/16/2003, Defendant herein. Victim 1 explained that he still was upset about a prior incident with Defendant. When Victim 1 and his friend, E.K.R., saw Defendant at the Mall of America, they started to chase him. Victim 1 stated that, while he was chasing Defendant, Defendant turned around, pulled out a "Glock 9," and shot him in the leg.

Another adult male, Victim 2, had a bullet-graze wound to his left shoulder. Victim 2 was treated by paramedics at the scene.

Officers recovered a single discharged shell casing at the scene. Officers also located a defect on the metal railing near the shooting scene. It was determined that Defendant fired a single gunshot. The bullet struck Victim 1's left leg, exited Victim 1's leg, ricocheted off the metal railing, and grazed Victim 2's left shoulder. Additionally, surveillance video showed that, at the time of the shooting, the mall was crowded with patrons, including children.

Using information gathered during the investigation, officers determined that Defendant was staying at 286 Stinson Street, in the city of St. Paul. While conducting surveillance on 286 Stinson Street, officers observed Defendant was seen leaving the residence in a Dodge sedan. A traffic stop was conducted, and Defendant was taken into custody. When Defendant was taken into custody, officers recovered a Polymer 80 9mm handgun on his person.

In a post-Miranda statement, Defendant admitted to shooting Victim 1 on December 31, 2021. Defendant explained that Victim 1 and E.K.R. started to chase Defendant and an associate of his. Defendant ran several laps around the corridor looking for an exit. Defendant got scared when Victim 1 started to close on him, so Defendant pulled out his handgun and fired at Victim 1. Defendant admitted that he purchased the handgun off the internet. The handgun recovered during his arrest was the same gun he used on December 31, 2021.

Defendant remains 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

Kerri Nolden
Detective
1800 W Old Shakopee Road
Bloomington, MN 55431
Badge: 237

Electronically Signed:
01/06/2022 11:48 AM
Hennepin County, Minnesota

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

Prosecuting Attorney

Joshua Larson
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
01/06/2022 11:38 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 as directed in the Notice of Hearing before the above-named court 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: \$250,000.00

Conditions of Release: No Contact with Victim; Remain Law Abiding; Make All Appearances; No Possession of Weapons; Random UAs; No use of drugs/alcohol

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: January 6, 2022.

Judicial Officer

Bridget A Sullivan
District Court Judge

Electronically Signed: 01/06/2022 12:02 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.

KAHLIL MARKELL WILEY

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: KAHILIL MARKELL WILEY
DOB: 07/16/2003
Address: 286 Stinson St
St. Paul, MN 55117

Alias Names/DOB: Khalil Markell Wiley DOB: 7/16/2003
SID: MN18B14083

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 #: 900821
SILS Tracking No. 3259179
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	12/31/2021	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2323		MN0270100	21012042
	Definition	12/31/2021	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A2323		MN0270100	21012042
	Penalty	12/31/2021	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	A2323		MN0270100	21012042
	Penalty	12/31/2021	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2323		MN0270100	21012042
2	Charge	12/31/2021	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2223		MN0270100	21012042
	Definition	12/31/2021	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A2223		MN0270100	21012042
	Penalty	12/31/2021	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	A2223		MN0270100	21012042
	Penalty	12/31/2021	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2223		MN0270100	21012042