

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 24A04054  
Court File No. 27-CR-24-20556

State of Minnesota,

Plaintiff,

vs.

**CURTIS EDWARD JACKSON** DOB: 08/08/1996

8120 Zane Ave N  
Brooklyn Park, MN 55443

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), 609.19.1

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 04/05/2024

Control #(ICR#): 24087402

Charge Description: That on or about April 5, 2024, in Minneapolis, Hennepin County, Minnesota, CURTIS EDWARD JACKSON, 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

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

On April 5, 2024, at approximately 12:13 AM, officers responded to the sound of gunfire near a residence located at 818 Russell Avenue North in Minneapolis, Hennepin County, Minnesota.

Officers soon learned that two men suffered gunshot wounds. One male, identified as Victim, was transported from the scene by a private vehicle to HCMC, where he was pronounced deceased by medical staff. The other male, identified as Curtis Jackson, the defendant in this case, was located down the alley from 818 Russell and was transported to HCMC, where he was treated for his injuries and survived. While receiving assistance, Defendant acknowledged that he and Victim shot each other in the backyard of 818 Russell and that Victim was his cousin.

Officers responded to the scene and located numerous discharged cartridge casings (DCCs) in the rear driveway, blood spatter on the ground, and multiple surveillance cameras which were pointed toward the driveway. Officers located a total of 13 DCCs. Subsequent forensic testing revealed that there were seven 9mm DCCs that were fired from a single gun and six .45-caliber DCCs that were fired from a second gun. The firearms were not recovered.

Officers spoke to multiple witnesses who acknowledged that 27-year-old Defendant and 28-year-old Victim were biological cousins and knew each other well.

According to accounts from witnesses, earlier in the evening, Defendant, Victim, Witness A, and Witness B were together at 818 Russell, which is the home of Victim's mother, stepfather, and siblings, and then went downtown together. Witness A explained that he drove; Witness B was in the front passenger seat; and Victim and Defendant were in the backseat. Witness A and Witness B stated that Defendant was in possession of a 9mm handgun. Witness B clarified that Defendant's firearm was a Glock with a laser sight and that Defendant also brought along a backpack.

Witness A and Witness B stated that, while parked in a surface lot downtown, Defendant and Victim had a verbal dispute in the vehicle and then a physical altercation which migrated outside of the vehicle. Victim ended the altercation by re-entering the vehicle. In response, Defendant pulled out a firearm and fired a gunshot. Witness A and Witness B separately explained that Defendant's aggressive behavior and gunfire prompted Victim, Witness A, and Witness B to drive off, leaving Defendant by himself. Witness B recalled hearing Victim comment that Defendant left his backpack in the car and that he was not going to give it back immediately. Witness A and Witness B separately recalled Victim later explain that he and Defendant would need to finish their fight before he returned the backpack.

Investigators obtained surveillance video of this altercation between Victim and Defendant downtown, which corroborates Witness A's and Witness B's accounts that, while in downtown Minneapolis, Defendant got into a fight with Victim. The video also reveals that Victim remained by the rear passenger door of the vehicle when Defendant pulled out his firearm, pointed it in the air, and fired it. Following the gunfire, the vehicle drove away from Defendant.

Witness A explained that, after leaving Defendant downtown, he drove Victim and Witness B to another bar and then back to 818 Russell Avenue. When they arrived, Witness A parked his vehicle facing the rear of the house and observed that Defendant had returned to the residence on his own. Witness A observed that Defendant walked to the driver's side of the vehicle and asked for his backpack. Witness A stated that,

although Victim conveyed to Defendant that he would not give Defendant the backpack, Victim made no threatening remarks, gestures, or movements toward Defendant. Defendant then walked around the rear of the vehicle to the passenger side and immediately shot Victim without warning. Witness A observed that Victim was not facing Defendant at the time; that Victim's body was not in a position to enable him to shoot at Defendant at that time; and that Defendant did not give Victim a chance to protect himself before shooting him.

Witness B reported that he was in the front passenger seat at the time of the shooting. He acknowledged that he had been drinking alcohol during the day and that he was "drunk" at the time of the shooting. He nevertheless was aware of the circumstances of the shooting; the states of mind of Defendant and Victim; and corroborated Witness A's account that Defendant was the aggressor and provocateur before and during Defendant's encounter with Victim.

Investigators searched the vehicle driven by Witness A and located a backpack which contained a quantity of marijuana.

Investigators obtained surveillance video of the shooting. It reveals that, after Defendant exited the rear door of 818 Russell, he walked to the driver's side of the vehicle before anyone exited the vehicle. Defendant opened the rear driver's-side door and reached into the vehicle. Meanwhile, Victim exited the rear passenger-side door and closed it, and Defendant asked Victim where the "weed" was. Defendant then walked around the rear of the vehicle, asking again about the "weed." Victim responded verbally to Defendant, but his specific comment was not captured audibly.

Victim then turned away from Defendant, stepping toward the front passenger door of the vehicle. In so doing, Victim turned his back to Defendant. The door to the front passenger seat, where Witness B was located, opened, and Victim turned and faced the vehicle, with the left side of his body now facing Defendant.

As Defendant cleared the back of the vehicle, in a single motion and without hesitation, Defendant turned toward Victim and raised a firearm equipped with a laser sight directly at Victim from several feet away. The beam from the laser sight placed a glowing dot on Victim's left shoulder and head, evidencing an intent to shoot Victim in vital areas as Victim stood perpendicular to Defendant. Then, multiple gunshots occurred.

Based on the surveillance video, it is apparent that, after the gunfire started, Victim turned toward Defendant and fired a handgun, held in his right hand, back at Defendant. Following this, Defendant turned his body and lunged for cover behind the vehicle while continuing to fire additional shots at Victim until Victim began to fall to the ground.

When the shooting stopped, other individuals became aware that Victim was injured and verbally confronted Defendant, who ran away down the alley. Individuals placed Victim back in the vehicle and drove off.

The Hennepin County Medical Examiner performed an autopsy which determined that Victim's death was caused by multiple gunshot wounds and that the manner of death was homicide. Autopsy photos reveal that Victim suffered three gunshot wounds to the left side of his body. The Medical Examiner determined the trajectory of all three gunshot wounds: (1) left upper arm: left to right, back to front; (2) left forearm: left to right, back to front; and (3) left chest/abdomen: left to right, front to back. The bullet that struck Victim's left chest traveled across Victim's chest, perforated major organs and vertebra, and came to a stop in Victim's right paraspinal soft tissue. These injuries are consistent with Defendant's gunfire striking Victim while Victim was turned away from/perpendicular to Defendant, still facing the vehicle.

Investigators spoke to Defendant. Defendant acknowledged that he went with Victim, Witness A, and Witness B to downtown Minneapolis earlier in the night and parked in a surface parking lot. Defendant acknowledged that he had with him a 9mm handgun with a laser sight and a bag containing approximately one pound of marijuana. Defendant acknowledged that, at around 10:30 or 11:00 PM, he and Victim got into an argument which turned into a physical fight outside of the vehicle. Victim then reentered the vehicle, and Victim and the other males drove off, leaving him alone in the parking lot. Defendant admitted that, once Victim got into the car and he believed they were going to drive away, he pulled out and fired his handgun one time as a “warning shot” to the men because they were driving off with his marijuana.

Defendant stated that he got a ride back to 818 Russell, at which point he entered the residence, spoke to multiple individuals and told them that Victim, Witness A, and Witness B drove off with his “stuff.” Upon his request, Victim’s mother called Victim, and Victim indicated that he would not be giving anything to Defendant. Defendant acknowledged that he told the family members that it was going to be a “problem” if he did not get what he believed was his property. Defendant acknowledged to investigators that, while in the residence, he made statements about killing Victim.

Defendant then provided an account of the shooting which suggested that he and Victim stood next to each other on the passenger side of the vehicle; that he grabbed the bag of marijuana directly from Victim’s hand; that Victim then raised his gun and shot him first; and then, only after he felt Victim’s bullets striking him, Defendant pulled out his gun and shot victim in “fear.”

Investigators observed that Defendant’s account was directly contradicted by surveillance video in multiple ways. Most importantly, as Defendant walked around to the passenger side of the car, he was several feet away from Victim, clearly had his firearm out already, never reached for a bag, and clearly pointed his firearm (evidenced by a laser dot) at Victim’s shoulder and face at that point, just as the gunfire began.

Investigators confirmed that, prior to the shooting, Defendant had interactions with Victim’s mother, stepdad, and sister inside 818 Russell. Victim’s mother and stepdad separately acknowledged that, when Defendant entered, he addressed them, stating, “I am going to kill your son.” Victim’s mother said that Defendant was “mad” because he and Victim got into a fight. Victim’s mother then called Victim’s cell phone and asked Victim why he and Defendant were fighting. In response, Victim calmly asked his mother how she knew they were fighting. She explained that Defendant had come to the house and told her. Victim responded by asking his mother to tell Defendant to shut up and then hung up the phone. Victim’s sister stated that, before Victim arrived back at 818 Russell, she heard Defendant saying repeatedly, “Yeah, he think I won’t shoot him, he think I won’t shoot him, but I will, he think somebody scared of him.” Victim’s stepdad recalled that, after their interaction with Defendant, Defendant left the residence, and then they heard gunshots. Victim’s stepdad exited the home and saw Victim on the ground.

A warrant is necessary because Defendant is a danger to public safety, including family members.

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:  
09/09/2024 10:46 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:  
09/09/2024 10:00 AM

MINNESOTA  
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BRANCH

**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: \$1,000,000.00

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

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: September 9, 2024.

**Judicial Officer**

Ronald L. Abrams  
District Court Judge

Electronically Signed: 09/09/2024 10:53 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.

**CURTIS EDWARD JACKSON**

Defendant

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

Signature of Authorized Service Agent:



27-CR-24-20556  
**DEFENDANT FACT SHEET**

*Filed in District Court  
State of Minnesota  
9/9/2024*

**Name:** CURTIS EDWARD JACKSON  
**DOB:** 08/08/1996  
**Address:** 8120 Zane Ave N  
Brooklyn Park, MN 55443

**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 #:**

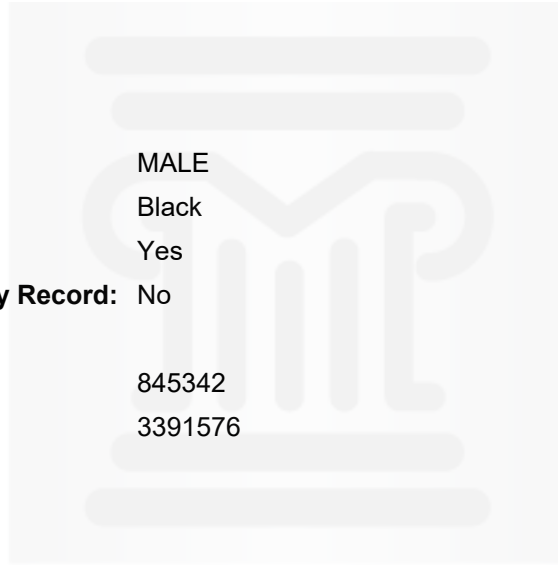
**SILS Person ID #:**

845342

**SILS Tracking No.**

3391576

**Alcohol Concentration:**



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27-CR-24-20556  
**STATUTE AND OFFENSE GRID**

Filed in District Court  
 State of Minnesota  
 9/9/2024

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	4/5/2024	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2011		MN0271100	24087402
	Penalty	4/5/2024	609.19.1 Murder - 2nd Degree	Felony	H2011		MN0271100	24087402
	Penalty	4/5/2024	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2011		MN0271100	24087402



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