

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 19A14637  
Court File No. 27-CR-19-29252

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**State of Minnesota,**

Plaintiff,

vs.

**JASON ROMAN GERARDY DOB: 10/05/1980**

99 BIRNAMWOOD DR  
BURNSVILLE, MN 55337

Defendant.

**COMPLAINT**

Order of Detention

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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: Threats of Violence - Reckless Disregard Risk**

Minnesota Statute: 609.713.1, with reference to: 609.713.1

Maximum Sentence: 5 YEARS AND/OR \$10,000

Offense Level: Felony

Offense Date (on or about): 11/23/2019

Control #(ICR#): 19011582

Charge Description: That on or about 11/23/2019, in Bloomington, Hennepin County, Minnesota, JASON ROMAN GERARDY did threaten to commit a crime of violence with the purpose of terrorizing another, and/or in reckless disregard of the risk of causing terror in another, specifically J.C.

**COUNT II**

**Charge: Damage to Property - 1st Degree - Value Reduced Over \$1000**

Minnesota Statute: 609.595.1(4), with reference to: 609.595.1

Maximum Sentence: 5 YEARS AND/OR \$10,000

Offense Level: Felony

Offense Date (on or about): 11/23/2019

Control #(ICR#): 19011582

Charge Description: That on or about 11/23/2019, in Bloomington, Hennepin County, Minnesota, JASON ROMAN GERARDY intentionally caused damage to physical property belonging to J.G. and M.A., without either victim's consent and such damage reduced the value of the property by more than \$1,000 as measured by the cost of repair and/or replacement.

## STATEMENT OF PROBABLE CAUSE

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

On November 23, 2019, at approximately 10:18 p.m., officers of the Bloomington Police Department were dispatched to an apartment building in the area of 9100 Old Cedar Avenue in Bloomington, Hennepin County, Minnesota. Witnesses at the scene indicated to dispatch that a male was in the parking lot and was smashing the windows on multiple vehicles.

Upon arrival, officers located an individual matching the description of the suspect walking on Old Cedar Avenue near the apartment building. The individual was bleeding profusely from his right hand and was yelling profanities at officers. The individual was eventually stopped and identified as JASON ROMAN GERARDY (DOB: 10/5/1980) (hereinafter "Defendant"). Defendant told officers at the scene that he had damaged three cars. Two of the cars belonged to his father and Defendant damaged those cars because he had argued with his father that evening. Defendant stated that he also broke out "some Somalian's windows" because "he's a [racial slur] and does not pay taxes."

Officers went to the parking lot of the apartment building and saw the three heavily damaged vehicles. M.A.'s vehicle is a 2017 black Toyota C4E. The rear windshield of this vehicle was completely broken and a repair estimate of \$427 was provided. M.A. told police that he is afraid of Defendant as Defendant has made comments to neighbors in the apartment building in the past that he does not like Muslims. It should be noted that M.A. is both Somali and Muslim. J.G., Defendant's father, had two vehicles that were seriously damaged by Defendant. A repair estimate of \$4,844 was provided for J.G.'s two vehicles.

Officers also spoke with witnesses at the apartment building. J.C. told police that he was visiting his girlfriend at the apartment that evening. When J.C. and his girlfriend heard Defendant smashing vehicles in the parking lot they walked out to the first-floor balcony to see what was happening. J.C. said that when Defendant saw him, he ran up towards the first-floor balcony, cocked back what was described as a large piece of metal, and yelled, "I'm going to kill you, you fucking [racial slur]." J.C. said that Defendant ran up to the balcony and threatened him at least twice. Defendant's father told police that Defendant occasionally goes into fits of rage. J.G. is afraid that someday Defendant will kill someone.

Defendant is currently 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**

Tracie Lee-Faust  
Police Officer  
1800 W Old Shakopee Road  
Bloomington, MN 55431  
Badge: 342

Electronically Signed:  
11/26/2019 09:33 AM  
Hennepin County, Minnesota

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

**Prosecuting Attorney**

Joseph R. Paquette  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
11/26/2019 09:27 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 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: \$30,000.00

Conditions of Release: No Contact with Victim; 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: November 26, 2019.

**Judicial Officer**

Edward Thomas Wahl  
District Court Judge

Electronically Signed: 11/26/2019 09:45 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.

**JASON ROMAN GERARDY**

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:** JASON ROMAN GERARDY  
**DOB:** 10/05/1980  
**Address:** 99 BIRNAMWOOD DR  
BURNSVILLE, MN 55337

**Alias Names/DOB:**

**SID:** MN99012322

**Height:**

**Weight:**

**Eye Color:**

**Hair Color:**

**Gender:** MALE

**Race:** White

**Fingerprints Required per Statute:** Yes

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

**Driver's License #:**

**SILS Person ID #:** 583783

**SILS Tracking No.** 3141989

**Alcohol Concentration:**

## STATUTE AND OFFENSE GRID

<b>Cnt Nbr</b>	<b>Statute Type</b>	<b>Offense Date(s)</b>	<b>Statute Nbrs and Descriptions</b>	<b>Offense Level</b>	<b>MOC</b>	<b>GOC</b>	<b>Controlling Agencies</b>	<b>Case Numbers</b>
1	Charge	11/23/2019	609.713.1 Threats of Violence - Reckless Disregard Risk	Felony	A9B43		MN0270100	19011582
	Penalty	11/23/2019	609.713.1 Threats of Violence - Reckless Disregard Risk	Felony	A9B43		MN0270100	19011582
2	Charge	11/23/2019	609.595.1(4) Damage to Property - 1st Degree - Value Reduced Over \$1000	Felony	P111H		MN0270100	19011582
	Penalty	11/23/2019	609.595.1 Damage to Property-1st Degree	Felony	P111H		MN0270100	19011582