

State of Minnesota County of Hennepin District Court

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CTY ATTY CONTROLLING
 FILE NO. AGENCY CONTROL NO.
 03-6387 0271100 03299833

COURT CASE NO. DATE FILED

01 JAN 13 PM 2:20

DEPT
 HENNEPIN CO. DISTRICT
 COURT ADMINISTRATOR

☐ if more than 6 counts (see attached) ☐ if Domestic Assault as defined by MS 518B01, sub2a,b

State of Minnesota,

PLAINTIFF,

VS.

☒ Amended ☐ Tab Charge Previously Filed
☒ SERIOUS FELONY ☐ SUMMONS
☐ FELONY ☒ WARRANT
☐ GROSS MISDM DWI ☐ ORDER OF DETENTION
☐ GROSS MISDM ☐ EXTRADITION

NAME: first, middle, last	SIP #	Date of Birth	LEGAL EDGE NUMBER
GEORGETTE STEPHANIE BYERS	03081218	09/04/81	03-54185
ROCHELLE LYNETTE CONEY	03082071	08/21/78	03-54328
MATTHEW LEE GLOVER	03082067	05/04/85	03-54322
KENNETH RAY DANIELS	03082069	09/17/77	03-54325
<u>DAVID JOHNSON</u>	<u>04002659</u>	<u>08/11/81</u>	<u>04-10605</u>

DEFENDANT(s)

COMPLAINT

The Complainant, being duly sworn, makes complaint to the above-named Court and states that there is probable cause to believe that the Defendant committed the following offense(s). The complainant states that the following facts establish PROBABLE CAUSE:

PROBABLE CAUSE PORTION REMAINS AS IS:

Your Complainant, Rick Sheldon, is a sergeant with the Minneapolis Police Department and in that capacity has investigated this matter by reading the reports of Officers Walker and Tucker and by talking to the victim.

Complainant has learned that on November 6, 2003 at approximately 10:15 p.m., Officers Walker and Tucker responded to a report of a shooting at 1710 Sheridan Avenue North in Minneapolis, Hennepin County, Minnesota. At the scene, officers observed a woman at the back of said building and noted that she was bleeding from her head and that her left arm appeared to have been shot, exposing the bone. Officers identified the victim as Jessica Reed. Medical personnel arrived and removed from the victim's neck a restraint that she said the assailants had placed on her. An ambulance took the victim to North Memorial Hospital where she underwent surgery. Officer Tucker observed the victim's car and noted what appeared to blood and bone marrow splattered over the driver side door, window and seat. He noted two expended 12 gauge shotgun shells lying outside the passenger door and an unexpended shot gun shell lying in the back seat.

Complainant talked to the victim on November 10th and learned that she had gone to a home near 17th and Emerson Avenue North and got into an argument with Georgette and Rochelle who began to beat her. They then tied her to a

AMENDED

chair with phone cords, duct tape and a towel and continued to beat her. They then put her in a closet for approximately two hours where she slipped in and out of consciousness. Someone she knew as G Baby removed her from the closet, kicked her in the face numerous times and demanded someone bring him a gun. Someone carried her to the trunk of a car and placed her in it. She explained that she heard several people talking about killing her and noted that Rochelle was driving the car and Georgette was in the front passenger seat. She later learned that the men were in another vehicle. When the car stopped and the front seat occupants exited the car, the victim came through the back seat in an attempt to get away. A person called "Money" opened the door and took the car keys from her. After Rochelle hit her again, G Baby held her by the shoulders and Dough Boy attempted to shoot her in the head. She was able to lift her arm so that she took the full force of the 12-gun blast in her forearm. The assailants left in the other vehicle, leaving the victim in the car. She was able to get out of the car and ask a woman for help. Complainant showed the victim a photo of DAVID JOHNSON and KENNETH RAY DANIELS, and noted that the victim stated that she knew them respectively as G Baby and Money.

On November 10th, Complainant talked to Kasterdell Thomas who stated that he was present after the shooting when "Dough Boy" bragged that he had shot said victim.

On November 11th, Complainant again talked to the victim. He showed her photos of MATTHEW LEE GLOVER and ROCHELLE LYNETTE CONEY, above-named Defendants, and heard her confirm that she knew the people as Dough Boy and Rochelle. Complainant confirmed that the home where the initial assault took place was 1825 Emerson Avenue North. Complainant drafted a search warrant that was signed by Judge Lucy Wieland. Complainant executed the warrant on November 13th. Officers found blood samples at various locations. Officer Martin advised her of the Miranda rights and heard her acknowledge that she was, in fact, the person who got into an argument with the victim. Officers arrested her and transported her to the Hennepin County Jail where Officer Martin again advised her of the Miranda rights. Defendant Byers stated that the victim arrived just after 4:00 p.m. and that she and the victim got into a fight. Defendant BYERS acknowledged that she gave the victim a beating and forced her to sit in a chair. She stated that Defendant DANIELS arrived and continued to severely beat the victim who went in and out of consciousness. Defendant DANIELS forced the victim to sit in a chair inside a closet for approximately one and one half-hours. Defendant BYERS heard Defendant DANIELS state that he wanted a gun to do in the victim. When Defendant DANIELS ordered her and Defendant CONEY to bring the victim to the trunk of a car, she complied. She and Defendant CONEY also complied when ordered to drive the victim's car with the victim locked in the trunk and to follow Defendant DANIELS who was in another car. She stated that when they stopped, Defendant DANIELS shot the victim who had put her arm in front of her face to protect herself. She admitted that they left the scene in Defendant DANIELS' car, leaving the victim in her car.

Defendant Byers is currently in custody. Defendants Coney, Glover and Daniels' are currently not in custody.

OFFENSE PORTION IS AMENDED TO ADD NAME OF ADDITIONAL DEFENDANT

O F F E N S E

COUNT 1: ATTEMPTED MURDER IN THE FIRST DEGREE (FELONY)
MINN. STAT. 2003 §609.185(a)(1); §609.11; §609.106, SUBD. 2(2); §609.17; §609.05
PENALTY: 0-20 YEARS

That on or about November 6, 2003, in Hennepin County, Minnesota, **GEORGETTE STEPANIE BYERS, ROCHELLE LYNETTE CONEY, MATTHEW LEE GLOVER, KENNETH RAY DANIELS, DAVID JOHNSON** acting alone or intentionally aiding, advising, hiring, counseling or conspiring with each other, while using a firearm, attempted to cause the death of J.R., a human being, with premeditation and with intent to effect the death of that person, or another.

AMENDED

COMPLAINT SUPPLEMENT

CCT	SECTION/Subdivision	M.O.C.	GOC

COUNT 2: KIDNAPPING (FELONY)
 MINN. STAT. 2003, §609.25, SUBD. 1(2), 2(2)
 PENALTY: 0-40 YEARS AND/OR \$50,000

That on or about November 6, 2003, in Hennepin County, Minnesota, **GEORGETTE STEPANIE BYERS, ROCHELLE LYNETTE CONEY, MATTHEW LEE GLOVER, KENNETH RAY DANIELS, DAVID JOHNSON** acting alone or intentionally aiding, advising, hiring, counseling or conspiring with each other confined and/or removed J.R. from one place to another without her consent, in order to facilitate commission of a felony or flight thereafter.

NOTICE: You must appear for every court hearing on this charge. A failure to appear for court on this charge is a criminal offense and may be punished as provided in Minn. Stat. § 609.49.

THEREFORE, Complainant requests that said 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'S NAME:

Sergeant Rick Sheldon

COMPLAINANT'S SIGNATURE:

[Signature]

Being duly authorized to prosecute the offense(s) charged, I hereby approve this Complaint.

DATE:

January 13, 2004

lfb

PROSECUTING ATTORNEY'S SIGNATURE:

[Signature]

PROSECUTING ATTORNEY:

NAME/TITLE:

Charles H. Salter (130655)
Assistant County Attorney

FORM I-2

ADDRESS/TELEPHONE:

C2100 Government Center, Minneapolis, MN 55487
Telephone: (612) 348-8197

Rev. 3/94

FORM-J

AMENDED

REV. 12/95

Court Case # _____
This COMPLAINT was subscribed and sworn to before the undersigned this _____ day of _____, 20____.
NAME _____ SIGNATURE _____
TITLE _____

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 his detention, if already in custody, pending further proceedings. The Defendant(s) is/are thereof charged with the above stated offense.

SUMMONS

☒ THEREFORE YOU, THE ABOVE-NAMED DEFENDANT(S), ARE HEREBY SUMMONED to appear on the _____ day of _____, 20____ at _____ AM/PM before the above-named court at _____ to answer this complaint.
☐ IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

WARRANT

☐ EXECUTE IN MINNESOTA ONLY

To the sheriff of the above-named county or other person authorized to execute this WARRANT, I hereby order, in the name of the State of Minnesota, that the above-named Defendant(s) be apprehended and arrested without delay and brought promptly before the above-named 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 thereafter as such Judge or Judicial Officer is available) to be dealt with according to law.

ORDER OF DETENTION

☒ Since the above-named Defendant(s) is already in custody, I hereby order, subject to bail or conditions of release, that the above-named Defendant(s) continue to be detained pending further proceedings.

Bail: \$500,000 - INTENSIVE CR

Conditions of Release: NO CONTACT WITH VICTIM, NO DRUGS OR ALCOHOL, RANDOM TESTING, TWICE WEEKLY REPORTING, NO WEAPONS.

This COMPLAINT - WARRANT duly subscribed and sworn to, is issued by the undersigned Judicial Officer this _____ day of _____, 20____.

NAME: **DIANA S. EAGON** SIGNATURE: *Diana S. Eagon*
TITLE: **Judge of District Court**

Sworn testimony has been given before the Judicial Officer by the following witnesses:

STATE OF MINNESOTA	COUNTY OF HENNEPIN	Clerk's Signature or File Stamp
STATE OF MINNESOTA		RETURN OF SERVICE I hereby Certify and Return that I have served a copy of this COMPLAINT - SUMMONS, WARRANT, ORDER OF DETENTION upon Defendant(s) herein-named. Signature of Authorized Service Agent: _____
Plaintiff		
Vs.		
GEORGETTE STEPANIE BYERS, ROCHELLE LYNETTE CONEY, MATTHEW LEE GLOVER, KENNETH RAY DANIELS Defendant(s).		