State of Minnesota County of Hennepin

District Court 4th Judicial District

Prosecutor File No. Court File No.

22A01846 27-CR-22-3358

State of Minnesota,

COMPLAINT

Plaintiff,

Warrant

VS.

DPREE SHAREEF ROBINSON DOB: 08/09/2002

2001 Glenwood Ave #1 Minneapolis, MN 55405

Defendant.

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, 609.11.9

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 05/15/2021

Control #(ICR#): 20210609

Charge Description: That on or about 5/15/2021, in Hennepin County, Minnesota, DPREE SHAREEF ROBINSON, 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

STATEMENT OF PROBABLE CAUSE

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

On May 15, 2021, at approximately 8:32 PM, Minneapolis police responded to a shot spotter activation on the 2200 block of Ilion Avenue North, in the City of Minneapolis, County of Hennepin. This was a drive-by shooting that was captured on surveillance video. A juvenile female, "victim," who was jumping on a trampoline in a residential backyard was struck and killed by the gunfire. Video showed that the victim and two other juveniles who were on the trampoline were directly between the shooter and the intended targets, who appeared to be three males on the side porch of the residence, dressed in dark clothing. One of the three on the porch could be observed chasing after the suspect vehicle on foot and appeared to return fire three times.

Three 9mm discharged cartridge casings (DCC's) were subsequently located in the alley, consistent with having come from the individual who had shot at the suspect vehicle.

Through video surveillance and License Plate Reader (LPR) technology, the vehicle used for the drive-by was determined to be a 2014 Ford Fusion, MN plates 720 XRP. Aside from the positive LPR identification, the vehicle had other distinguishing characteristics.

Investigators determined that that this vehicle had been purchased on May 12, 2021, by a DPREE SHAREEF ROBINSON, DOB 08/09/2002. ROBINSON purchased the vehicle from an identified male, initials Z.G. ROBINSON instructed Z.G. not to let anyone know he had the Ford Fusion, and Z.G. acknowledged that he would not.

At all relevant times the vehicle could be located by LPR or surveillance video on 5/14/21 and 5/15/21, to include the time of the murder, ROBINSON's known cell phone was in the same geographical vicinity as the suspect Ford Fusion.

On his social media accounts, ROBINSON has touted himself as an active shooter for the Black Disciples Criminal Street Gang, making repeated references to firearms, shooting, the "opps," (street slang for opposition or rival gangs), and other comments like, "Never stand down b!tch my mama raised a gangsta," and, "I know how to shoot and I know how to fight." ROBINSON also refers to himself as "GDK," or "Gangster Disciple Killer," which refers to a rival gang of the Black Disciples.

Subsequent investigation revealed that in February, 2021, ROBINSON had been engaging in threatening social media communications with a male resident of 2211 Ilion Avenue, initials W.J. W.J. has never directly answered the question of whether he was present at the time of the shooting. However, witness accounts of the scene indicate that both W.J. and the vehicle he drove were present at 2211 Ilion at the time of the gunfire.

The communications between ROBINSON and W.J. were aggressive and indicative of the kind that result in shootings between rival gang members. For context, ROBINSON had a number of previous posts that insinuated he was out looking for "opps," but they were afraid to come outside and face him. A pertinent example is, "The opps be tuff up onna net they don't even be outside."

It is known by law enforcement that criminal street gangs often use drive-by shootings against their rivals as a means to obtain "respect," or fear, which helps them promote their criminal activities.

In the texts between ROBINSON and W.J., ROBINSON dared W.J. to "pop out," or come outside. W.J. responds, "I'm always outside you gone(sic) see me stop texting me like my bitch."

Additionally, ROBINSON had apparently been romantically involved with W.J.'s sister. The two obviously had a bad break up, and W.J.'s sister had hostile communications with ROBINSON on 5/12/21, three days before the shooting, accusing him of cheating on her and lying to her.

Approximately thirty minutes after the 5/15/21 murder of the victim, ROBINSON conducted three internet searches related to changing the paint on a 2014 Ford Fusion, then quit using this cell phone forever. The thirteen calls he received at this number after the shooting went straight to voicemail. Further, despite an extensive, nation-wide search, the 2014 Ford Fusion that ROBINSON purchased on 5/12/21 and was last seen on 5/15/21 committing the drive-by shooting appears to have vanished.

Both W.J. and the homeowner at 2211 Ilion Ave North have been deceptive with law enforcement since the shooting. W.J. and his colleagues are part of a criminal street gang, "MCD," or Money Chasing Demons. MCD is associated with the "Highs" affiliation of criminal street gangs. As such, they are rivals to the Black Disciples, who are associated with the "Lows" affiliation of criminal street gangs.

Evidence at the scene of the victim's murder appears to have been tampered with. For example, a colleague of W.J., initials A.S., who was present (with a bag) at the murder scene when police arrived on 5/15/21, was arrested in Eagan on 10/11/21. He was in possession of a handgun at the time. Ballistics examination matched the 9mm possessed by A.S. on 10/11/21 to the DCC's located in the alley in this case. (i.e., A.S. or someone he knew was the person who shot back at the maroon Fusion).

Search warrants executed on ROBINSON's social media uncovered a Facebook conversation he had with his girlfriend, "A.H.," in June, 2021. In this conversation, A.H. was upset with ROBINSON over a physical altercation the two had during which ROBINSON apparently broke A.H.'s cell phone.

A.H. repeatedly (eight times) made reference to or directly called ROBINSON, a "child killer," and at one point tells him, "i hope you die for killin that lil girl." ROBINSON responded, "Idgaf ("I don't give a f***") what we go threw (sic) you don't ever wanna see me in that cell."

In February, 2022, investigators spoke with an identified individual, referred to hereinafter as "Witness 1." Witness 1 is a documented acquaintance of ROBINSON. Witness 1 described to investigators how ROBINSON admitted to being present at the 5/15/21 murder of the victim.

According to Witness 1, ""Um. He (ROBINSON) had told me that he was in a – like – sh – clap out... (with the "opps"). Witness 1 clarified that clap out meant shoot out and that the "opps" were rival gang members. Witness 1 said, "...he said the next day, he seen that a girl had, um, had been shot in the head. But he said, he—he—he basically was telling me in a way he was confused. He didn't know if it was them, or it could have been him."

A review of the surveillance footage, some of which included audio recordings of the incident, revealed that the victim was shot prior to the three shots of return fire from the individual from the side porch of the residence. Further, the return fire took place after that shooter ran past the victim's location and was in the alley pointing his gun at the suspect Ford Fusion, which was traveling away from where the victim was shot.

ROBINSON's whereabouts are currently unknown. The State is seeking high bail to ensure his appearance and for purposes of public safety. Further, because making this complaint public may cause ROBINSON to flee, hide evidence, and endanger the safety of potential witnesses, the State is asking it be sealed until ROBINSON's arrest.

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 Robert Santoro

Special Agent

1430 Maryland Avenue E

St. Paul, MN 55106

Badge: 1360

Electronically Signed: 02/22/2022 12:12 PM

Ramsey County, Minnesota

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

Prosecuting Attorney Thad Tudor

300 S 6th St

Minneapolis, MN 55487

(612) 348-5550

Electronically Signed: 02/22/2022 12:10 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).											
	Sur	MMONS									
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 APPEA	R in response to this SUMMONS, a	WARRANT FOR YOUR ARREST shall be issued.									
X WARRANT											
of Minnesota, that the D session), and if not, befo	efendant be apprehended and arr	uthorized to execute this warrant: I order, in the name of the State ested without delay and brought promptly before the court (if in court without unnecessary delay, and in any event not later than Officer is available to be dealt with according to law.									
☐ Execute	in MN Only X 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:											
This complaint, duly subs as of the following date: I		penalty of perjury, is issued by the undersigned Judicial Officer									
Judicial Officer	udicial Officer Gina Brandt Electronically Signed: 02/22/2022 12:26 PM District Court Judge										
Sworn testimony has bee	en given before the Judicial Officer b	y the following witnesses:									
	COUNTY OF HENNEPI STATE OF MINNESOT										
State	of Minnesota										
	Plaintiff	LAW ENFORCEMENT OFFICER RETURN OF SERVICE I hereby Certify and Return that I have served a copy of this Warrant									

VS.

DPREE SHAREEF ROBINSON

Defendant

upon the Defendant herein named.

Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

DPREE SHAREEF ROBINSON

DOB:	08/09/2002
Address:	2001 Glenwood Ave #1 Minneapolis, MN 55405
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 #:	880800
SILS Tracking No.	3265329
Case Scheduling Information:	Rush Warrant We are submitting a Motion/Order to Seal Complaint.

Name:

Alcohol Concentration:

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STATUTE AND OFFENSE GRID

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC G	ОС	Controlling Agencies	Case Numbers
1	Charge	5/15/2021	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2F12		MNBCA0000	20210609
	Modifier	5/15/2021	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2F12		MNBCA0000	20210609
	Penalty	5/15/2021	609.19.1 Murder - 2nd Degree	Felony	H2F12		MNBCA0000	20210609
	Penalty	5/15/2021	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2F12		MNBCA0000	20210609