

State of Minnesota
County of Hennepin

District Court
Fourth Judicial District

CCT	LIST CHARGE STATUTE ONLY	MOC	GOC
1	§609.185	H1042	X
2	§609.185	H1342	X
3	§609.185	H1045	X
4	§609.185	H1345	X

CTY ATTY
FILE NO.
08-4913

CONTROLLING
AGENCY
MN0271100

CONTROL NO.
08173807

COURT CASE NO.

DATE FILED

HOMICIDE

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

State of Minnesota,

PLAINTIFF,

VS.

NAME: first, middle, last
STAFON EDWARD THOMPSON

Date of Birth
5/2/91

MNCIS #:

LE#: 08-28714
SILS ID: 633214
TRACK ID: 2245931

725 ALDRICH AVE N #102
MINNEAPOLIS, MN 55411

DEFENDANT,

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.

Your complainant, Sergeant Gerald Wallerich, is a homicide investigator with the Minneapolis Police Department. In that capacity, he has investigated the facts and circumstances in this matter and believes the following to be true:

On June 12, 2008, just after 7:00 a.m., Minneapolis police responded to a report of a double homicide at a residence in the 3600 block of 1st Avenue South, Minneapolis, Hennepin County, Minnesota. J.W. reported that he had arrived home from working the night shift at his job. J.W. reported that he entered his house and found his girlfriend, K.D., and his ten-year-old stepson, R.S., both dead, covered in blood. J.W. reported that he also found his one-year-old daughter in the house; she had blood on her clothes and body, but had no physical injuries that he could see.

Minneapolis police entered the residence and found K.D. dead in the bathroom and R.S. dead in one of the front bedrooms. Blood spatter was found throughout the house, including the living room, the dining room, the hallway, the back bedroom, and the two rooms in which the victims were found. Police recovered two knives, a golf club and a television set from the house, all of which are believed to have been used as murder weapons. Police recovered another knife in a garbage can in the alley behind the house, which is also believed to have been used as a murder weapon. Bloody footprints, handprints and fingerprints were found throughout the house.

J.W. provided police with K.D.'s cell phone number; police investigators were unable to locate the cell phone in the house. Police later recovered K.D.'s cell phone in a garbage can approximately two blocks from the crime scene.

Investigators determined that the last number called from K.D.'s cell phone was made to the telephone of T.S. T.S. was interviewed by investigators the morning of June 13, 2008. T.S. reported that at approximately 10:00 p.m. on

June 11, 2008, she drove **STAFON EDWARD THOMPSON**, defendant herein, and **BRIAN LEE FLOWERS**, defendant herein, to the victims' residence. T.S. reported that both of the defendants were acquainted with K.D., because they are friends with K.D.'s son, who is presently in Chicago. She reported that she picked up Defendant Thompson a few hours later near 38th and 1st Avenue South. She reported that she did not see Defendant Flowers at that time.

Investigators interviewed Defendant Thompson and Defendant Flowers on June 13, 2008. Defendant Thompson initially claimed that he and Defendant Flowers had only been at the victims' home from approximately 10:00 p.m. until midnight on June 11, 2008 and that he had no knowledge of the victims' murders. When asked about the injuries on his hands, he claimed that the injuries were from cat scratches. Initially, Defendant Flowers also claimed that he and Defendant Thompson had only been at the victims' house for a couple of hours on the evening of June 11th and that he had no knowledge of the victims' murders.

Investigators then spoke to a witness who told police that a friend of T.S. had provided him with information about the murders. T.S. was then interviewed a second time. During this interview, T.S. confirmed that she had driven both defendants to the victims' residence at approximately 10:00 p.m. on June 11, 2008. However, she now admitted that she picked up both Defendant Thompson and Defendant Flowers at approximately 3:00 a.m. on June 12, 2008, at a residence on 38th Street and 1st Avenue South, after receiving a telephone call from Defendant Thompson. T.S. reported that she drove both defendants back to her apartment. T.S. reported that Defendant Thompson's clothes were covered in blood and that he had cuts on his hands. T.S. reported that Defendant Thompson told her that some unknown gang members broke into the victims' house while they were there and that he had been fighting with them. T.S. reported that Defendant Flowers told her the same story. T.S. also reported that Defendant Thompson put some of his bloody clothes into a bag and left her apartment.

Defendant Thompson was then arrested. In a post-Miranda, taped statement, Defendant Thompson claimed that he and Defendant Flowers had been at the victims' house, when some unknown gang members entered the residence. He claimed that he fought with these unknown people. Defendant subsequently admitted that there were no unknown intruders. Defendant Thompson then claimed that Defendant Flowers told him that he wanted money and that he was going to rob K.D. He claimed that Defendant Flowers attacked and killed K.D., using a knife and a golf club. He claimed that Defendant Flowers said that R.S. had to be killed so that there would be no witness. He claimed that he did not know how R.S. was killed, as he ran from the house while Defendant Flowers was still inside. He claimed that he got the cuts on his hands while trying to prevent Defendant Flowers from attacking K.D. He admitted that he threw his bloody clothes away; however, he provided several untrue statements about the location where he disposed of the clothes. Defendant Thompson admitted that he wore gloves for a period of time while he was in the victims' house.

Defendant Flowers was also arrested. In a post-Miranda, taped statement, Defendant Flowers claimed that Defendant Thompson decided he wanted K.D.'s car. He claimed that Defendant Thompson attacked and killed K.D., using a knife and a golf club. He claimed that he kept R.S. in the bedroom to prevent him from seeing what was happening. He claimed that Defendant Thompson said that R.S. had to be killed so that there would be no witness. He claimed Defendant Thompson killed R.S. by assaulting him, including smashing a television set on the child's head. Defendant Flowers admitted that he and Defendant Thompson ran into the alley behind the house, where they disposed of a bloody knife. Defendant Flowers also admitted that he took K.D.'s cell phone from the house and later threw it in a garbage can a few blocks away.

At 2:56 a.m. on June 12, 2008, a person residing across the alley from the victim's residence contacted police. The person reported seeing two persons, matching the description of the defendants, acting in a suspicious manner in the alley.

Some of the clothing worn by Defendant Thompson and Defendant Flowers, identified as having blood-like substance, was recovered from T.S.'s residence as well as from a garbage can near T.S.'s residence. Officers also

located two rubber gloves with blood- like substance, as well as a single glove, from a garbage can in the alley behind the crime scene. PAGE 3

The medical examiner determined that K.D.'s manner of death was homicide and that the cause of death was multiple sharp force injuries. She suffered over one hundred separate sharp force and blunt force injuries to her body. The medical examiner determined that R.S.'s manner of death was homicide and that the cause of death was complex homicidal injuries.

Defendant Thompson and Defendant Flowers are both in custody.

ACCORDING TO MINN. STAT. §609.055, SUBD. 2(b), AND MINN.R.JUV.PROC. 18.01, SUBD. 2, DEFENDANT STAFON EDWARD THOMPSON IS AUTOMATICALLY SUBJECT TO ADULT COURT JURISDICTION.

O F F E N S E

COUNT 1: MURDER IN THE FIRST DEGREE (FELONY)

MINN. STAT. § 609.185(a)(1); § 609.11; § 609.106, SUBD. 2(1); §609.05

PENALTY: LIFE

That on or about June 11-12, 2008, in Hennepin County, Minnesota, **STAFON EDWARD THOMPSON**, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another and while using a dangerous weapon, caused the death of K.D., a human being, with premeditation and with intent to effect the death of that person, or another.

COUNT 2: MURDER IN THE FIRST DEGREE (FELONY)

MINN. STAT. § 609.185(a)(3); § 609.11; §609.05

PENALTY: LIFE

That on or about June 11-12, 2008, in Hennepin County, Minnesota, **STAFON EDWARD THOMPSON**, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another and while using a dangerous weapon, caused the death of K.D., a human being, with intent to effect the death of K.D. or another, while committing or attempting to commit the crime of aggravated robbery.

OFFENSES CONT. ON NEXT PAGE

COMPLAINT SUPPLEMENT

CCT	SECTION/Subdivision	M.O.C.	GOC

COUNT 3: MURDER IN THE FIRST DEGREE (FELONY)

MINN. STAT. § 609.185(a)(1); § 609.11; § 609.106, SUBD. 2(1); §609.05

PENALTY: LIFE

That on or about June 11-12, 2008, in Hennepin County, Minnesota, **STAFON EDWARD THOMPSON**, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another and while using a dangerous weapon, caused the death of R.S., a human being, with premeditation and with intent to effect the death of that person, or another.

COUNT 4: MURDER IN THE FIRST DEGREE (FELONY)

MINN. STAT. § 609.185(a)(3); § 609.11; §609.05

PENALTY: LIFE

That on or about June 11-12, 2008, in Hennepin County, Minnesota, **STAFON EDWARD THOMPSON**, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another and while using a dangerous weapon, caused the death of R.S., a human being, with intent to effect the death of R.S. or another, while committing or attempting to commit the crime of aggravated robbery.

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 Gerald Wallerich

COMPLAINANT'S SIGNATURE:



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

DATE:

June 17, 2008

ad

PROSECUTING ATTORNEY'S SIGNATURE:



PROSECUTING ATTORNEY:

NAME/TITLE:

MARLENE E SENECHAL (9917x)**Assistant County Attorney**

ADDRESS/TELEPHONE:

C2100 Government Center, Minneapolis, MN 55487**Telephone: 612-348-7927**

Court Case # _____

his 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: **ONE MILLION DOLLARS**

Conditions of Release:

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

NAME: _____

SIGNATURE _____

TITLE: **JUDGE OF DISTRICT COURT**

/S/ PATRICIA L. BELOIS
Judge of District Court

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

JUN 17 2008

STATE OF MINNESOTA

COUNTY OF HENNEPIN

Clerk's Signature or File Stamp:

STATE OF MINNESOTA

Plaintiff

vs.

STAFON EDWARD THOMPSON,

Defendant(s).

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: