

State of Minnesota

County of Stearns
Complaint

District Court

<input checked="" type="checkbox"/>	DOMESTIC ASSAULT
<input type="checkbox"/>	AMENDED COMPLAINT
<input type="checkbox"/>	TAB CHARGE PREVIOUSLY FILED

DATE FILED	PROSECUTOR FILE NO.	COURT FILE NO.
	CR-2008-2665	

STATE OF MINNESOTA,

PLAINTIFF,

WARRANT

SERIOUS FELONY

VS.

NAME: First, Middle, Last Jerry Lee Thompson 37575 82nd Avenue St. Joseph, MN 56374
DEFENDANT

Date of Birth 02/24/1959

WRB:gml 8/11/08 dc

Ct	Statute Type	Offense Date	Statute Number & Description	Offense Level	MOC	GOC	Controlling Agencies	Control Numbers
1	Charge	8/5/08	609.185 Subd. (a)(1); 609.17, Subd. 1; 609.11, Subd. 5 Attempted Murder -1st Degree - Premeditated	SF	H1011	A	MN0730000 MNBCA0000 MN0860000	08042457 2008-301 08029993
	Penalty		609.185Murder - 1st Degree					
2	Charge	8/5/08	609.185 Subd. (a)(6); 609.17, Subd. 1; 609.11, Subd. 5 Attempted Murder - 1st Degree - While Committing Domestic Abuse with Past Pattern of Domestic Abuse	SF	H1211	A	MN0730000 MNBCA0000 MN0860000	08042457 2008-301 08029993
	Penalty		609.185Murder - 1st Degree					
3	Charge	8/5/08	609.185 Subd. (a)(3); 609.17, Subd. 1; 609.11, Subd. 5 Attempted Murder-1st Degree - With Intent - While Committing a Felony	SF	H1211	A	MN0730000 MNBCA0000 MN0860000	08042457 2008-301 08029993
	Penalty		609.185Murder - 1st Degree					
4	Charge	8/5/08	609.185 Subd. (a)(3); 609.17, Subd. 1; 609.11, Subd. 5 Attempted Murder-1st Degree - With Intent - While Committing a Felony	SF	H1411	A	MN0730000 MNBCA0000 MN0860000	08042457 2008-301 08029993
	Penalty		609.185Murder - 1st Degree					
5	Charge	8/5/08	609.25 Subd. 1(3); 609.11, Subd. 5 Kidnapping-To Commit Great Bodily Harm/Terrorize	F	K3321	N	MN0730000 MNBCA0000 MN0860000	08042457 2008-301 08029993
	Penalty		609.25 Subd. 2(2)Kidnap-Not Release Safe Place-Great Bodily Harm or U/16 - Sentence					
6	Charge	8/5/08	609.582 Subd. 1(c); 609.11, Subd. 5 Burglary-1st Deg-Assault Person In Build/On Property	F	B1111	N	MN0730000 MNBCA0000 MN0860000	08042457 2008-301 08029993
	Penalty		609.582 Subd. 1Burglary-1st Degree					
7	Charge	8/5/08	609.222 Subd. 1; 609.11, Subd. 5 Assault-2nd Degree-Dangerous	F	A2522	N	MN0730000 MNBCA0000	08042457 2008-301

	Penalty		Weapon 609.222 Subd. 1 Assault-2nd Degree- Dangerous Weapon				MN0860000	08029993
8	Charge	8/5/08	609.222 Subd. 1; 609.11, Subd. 5 Assault-2nd Degree-Dangerous Weapon	F	A2524	N	MN0730000 MNBCA0000 MN0860000	08042457 2008-301 08029993
	Penalty		609.222 Subd. 1 Assault-2nd Degree- Dangerous Weapon					
9	Charge	8/5/08	518B.01 Subd. 14(d)(2) Domestic Abuse - Violate OFP while Possessing a Dangerous Weapon	F	N1370	N	MN0730000 MNBCA0000 MN0860000	08042457 2008-301 08029993
	Penalty		518B.01 Subd. 14(d)(2) Domestic Abuse - Violate OFP while Possessing a Dangerous Weapon					

Complaint

Complainant, _____, is a _____ for the Stearns County Sheriff's Office, and makes this Complaint 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:

On August 5, 2008, at approximately 5:35 a.m., Stearns County law enforcement was dispatched to 4508 192nd Street in Fairhaven Township, in the County of Stearns, State of Minnesota, on a possible domestic in progress. While en route, law enforcement was advised that Jerry Lee Thompson, DOB: 2-24-59, the defendant herein, was at the residence in violation of an Order for Protection and that he was in possession of a firearm and the weapon had been discharged. Prior to arrival of law enforcement, defendant left the scene with J.L.T., DOB 7-12-63, defendant's estranged wife, in the motor vehicle owned by J.L.T. J.L.T. was taken from her home against her will at gunpoint. Said motor vehicle was subsequently located and pursued for an extended period of time by law enforcement before it came to a stop and caused a collision with a Stearns County deputy's motor vehicle. Upon exiting the motor vehicle, defendant attempted to grab a firearm and was fired upon and wounded by law enforcement. He is currently hospitalized as a result of those wounds.

J.L.T. fled from the vehicle and advised law enforcement that defendant had arrived at her home in the early morning hours as she prepared to leave for work. She advised that he was at her residence in violation of an Order for Protection dating from April of 2008 that was obtained based upon allegations of domestic abuse. Existence of the OFP has been confirmed by reference to Stearns County District Court File No. FA-08-4535 and said order remained in effect as of August 5, 2008. Furthermore, it is apparent that defendant also appeared at the residence in violation of a No Contact Order as a result of a violation of the Order for Protection as reflected in Stearns County District Court File No. CR-08-6882 that is currently pending before the court.

J.L.T. advised that defendant had a weapon and repeatedly ordered her to get in the car to leave the home with him or he would kill her. She screamed and attempted to gain entry into the home and defendant became concerned that other persons inside the home were calling law enforcement. Defendant forced the doorway between the garage and the kitchen and entered the residence and pursued J.L.T. to her bedroom where he located R.S.V., DOB: 9-02-81, fully identified in offense reports, and his daughter, J.L.T., DOB: 5-29-96, fully identified in offense reports, who was on the phone when observed by defendant. Defendant pointed his weapon at R.S.V. and at J.L.T., DOB: 5-29-96, advising both that law enforcement had best not be called or he would kill J.L.T., DOB: 7-12-63, and himself. Defendant grabbed J.L.T.'s hair and forcibly removed her from the home back to the motor vehicle in the garage.

J.L.T. got away from defendant and again attempted to enter the home. Defendant shot at her. The bullet struck the doorframe next to J.L.T. After entering the home, defendant grabbed J.L.T. again by the hair and drug her back to the motor vehicle, forced her in and left the scene with her in the passenger's seat. She escaped from defendant only after the collision with the squad car.

Defendant subsequently acknowledged that he intended to kill J.L.T. and then commit suicide.

Your complainant has reason to believe and does believe that all of the above information is true and correct.

The above facts constitute your complainant's basis for believing that the above-named defendant, on or about the 5th day of August, 2008, in the Township of Fairhaven, County of Stearns, State of Minnesota, committed the following described offenses:

Count 1

Charge: Attempted Murder -1st Degree - Premeditated
In Violation of: 609.185 Subd. (a)(1); 609.17, Subd. 1; 609.11, Subd. 5
Penalty: 12 3/4 to 18 years imprisonment

That the defendant, Jerry Lee Thompson, then and there being, did wrongfully, unlawfully, intentionally, and feloniously attempt to cause the death of a human being, to-wit: J.L.T., DOB: 7-12-63, with premeditation and with intent to effect the death of the person or another.

Count 2

Charge: Attempted Murder - 1st Degree - While Committing Domestic Abuse with Past Pattern of Domestic Abuse
In Violation of: 609.185 Subd. (a)(6); 609.17, Subd. 1; 609.11, Subd. 5
Penalty: 12 3/4 years to 18 years imprisonment

That the defendant, Jerry Lee Thompson, then and there being, did wrongfully, unlawfully, intentionally, and feloniously attempt to cause the death of a human being, to-wit: J.L.T., DOB: 7-12-63, while committing domestic abuse when the perpetrator has engaged in a past pattern of domestic abuse upon the victim or upon another family or household member occurred under circumstances manifesting an extreme indifference to human life.

Count 3

Charge: Attempted Murder-1st Degree - With Intent - While Committing a Felony
In Violation of: 609.185 Subd. (a)(3); 609.17, Subd. 1; 609.11, Subd. 5
Penalty: 12 3/4 to 18 years imprisonment

That the defendant, Jerry Lee Thompson, then and there being, did wrongfully, unlawfully, intentionally, and feloniously attempt to cause the death of a human being, to-wit: J.L.T., DOB: 7-12-63, with intent to effect the death of a person or another, while committing or attempting to commit burglary.

Count 4

Charge: Attempted Murder-1st Degree - With Intent - While Committing a Felony
In Violation of: 609.185 Subd. (a)(3); 609.17, Subd. 1; 609.11, Subd. 5
Penalty: 12 3/4 to 18 years imprisonment

That the defendant, Jerry Lee Thompson, then and there being, did wrongfully, unlawfully, intentionally, and feloniously attempt to cause the death of a human being, to-wit: J.L.T., DOB: 7-12-63, with intent to effect the death of a person or another, while committing or attempting to commit kidnapping.

Count 5

Charge: Kidnapping-To Commit Great Bodily Harm/Terrorize
In Violation of: 609.25 Subd. 1(3); 609.11
Penalty: Not less than 3 years to 40 years imprisonment and/or \$50,000 fine

That the defendant, Jerry Lee Thompson, then and there being, did wrongfully, unlawfully, intentionally, and feloniously, confine or remove from one place to another, any person without the person's consent, to-wit: J.L.T., DOB: 7-12-63, to commit great bodily harm or to terrorize the victim or another, and did not release J.L.T. in a safe place.

Count 6

Charge: Burglary-1st Deg-Assault Person In Build/On Property
In Violation of: 609.582 Subd. 1(c); 609.11, Subd. 5
Penalty: Not less than 3 years to 20 years imprisonment and/or \$35,000 fine

That the defendant, Jerry Lee Thompson, then and there being, did wrongfully, unlawfully, intentionally, and feloniously enter a building without consent and with intent to commit a crime, or entered a building without consent and committed a crime while in the building and said individual assaulted a person or persons within the building or on the building's appurtenant property.

Count 7

Charge: Assault-2nd Degree-Dangerous Weapon
In Violation of: 609.222 Subd. 1; 609.11, Subd. 5
Penalty: Not less than 3 years to 7 years imprisonment and/or \$14,000 fine

That the defendant, Jerry Lee Thompson, then and there being, did wrongfully, unlawfully, intentionally, and feloniously assault another, to-wit: R.S.V., DOB: 9-02-81, with a dangerous weapon, to-wit: a firearm.

Count 8**Charge: Assault-2nd Degree-Dangerous Weapon****In Violation of: 609.222 Subd. 1; 609.11, Subd. 5****Penalty: Not less than 3 years to 7 years imprisonment and/or \$14,000 fine**

That the defendant, Jerry Lee Thompson, then and there being, did wrongfully, unlawfully, intentionally, and feloniously assault another, to-wit: J.L.T., DOB: 5-29-96, with a dangerous weapon, to-wit: a firearm.

Count 9**Charge: Domestic Abuse - Violate OFP while Possessing a Dangerous Weapon****In Violation of: 518B.01 Subd. 14(d)(2)****Penalty: 5 years imprisonment and/or \$10,000 fine**

That the defendant, Jerry Lee Thompson, then and there being, did wrongfully, unlawfully, intentionally, and feloniously violate an order for protection issued by a judge while possessing a dangerous weapon, to-wit: a firearm.

<i>THEREFORE, Complainant requests that said Defendant, subject to bail or conditioned of release be:</i> (1) <i>arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or</i> (2) <i>detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.</i>	
COMPLAINANT'S NAME: Stearns County Sheriff's Office	COMPLAINANT'S SIGNATURE

This COMPLAINT was subscribed and sworn to before the undersigned this ____ day of _____, 20__.

NAME: Title:	Signature:
---------------------	------------

Being duly authorized to prosecute the offense(s) charged, I hereby approve this Complaint	
DATE: August 11, 2008	PROSECUTING ATTORNEY'S SIGNATURE

PROSECUTING ATTORNEY: NAME/TITLE Will R. Brost Assistant County Attorney Attorney Registration #: 0148957	PROSECUTING ATTORNEY: ADDRESS/TELEPHONE Administration Center, Room 448 705 Courthouse Square St. Cloud, MN 56303 320-656-3880
--	--

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. The Defendant(s) is/are thereof charged with the above stated offense(s)

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 Room #128, Courts Facility, 815 Courthouse Square, St. Cloud, Minnesota, 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 EXECUTE NATIONWIDE EXECUTE IN BORDER STATES
 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/are 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:
Conditions of Release:

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

NAME: _____ Signature: _____
TITLE: Judge of District Court

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

STATE OF MINNESOTA, COUNTY OF STEARNS

STATE OF MINNESOTA
Plaintiff

vs

Jerry Lee Thompson
Defendant(s)

Clerk's Signature or File Stamp:

RETURN OF SERVICE
I hereby Certify and Return that I have served a copy of this COMPLAINT upon then Defendant(s) herein-named.

Signature of Authorized Agent:

STATE OF MINNESOTA vs. Jerry Lee Thompson.

Court File Number:

Prosecutor File Number: CR-2008-2665

DEFENDANT FACT SHEET

- 1. Address: Jerry Lee Thompson
37575 82nd Avenue
St. Joseph, MN 56374
- 2. DOB: 02/24/1959
- 3. Race/Ethnicity: White
- 4. SID: MN81000728
- 5. Alias Information:
- 6. Fingerprinted: No
- 7. Handgun Permit:
- 8. Location of Violation: Fair Haven Township
- 9. Drivers License #: F761004592117/MN
- 10. Accident Type: No Injury/No Damage Property Damage
 Personal Injury Fatality
- 11. License Plate #: N/A
- 12. Alcohol Concentration: N/A