

State of Minnesota
County of Blue Earth

District Court
5th Judicial District

Prosecutor File No.
Court File No.

BEC-16-1650-02
07-CR-16-3984

State of Minnesota,

Plaintiff,

vs.

SYMONE LASHON CAUSEY DOB: 12/02/1996

615 3rd Ave. SE
Rochester, MN 55904

Defendant.

COMPLAINT

Order of Detention

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: Assault - 4th Degree - Peace Officer - Physically Assaults

Minnesota Statute: 609.2231.1(b)

Maximum Sentence: 1 year and/or \$3,000

Offense Level: Gross Misdemeanor

Offense Date (on or about): 10/09/2016

Control #(ICR#): 16030636

Charge Description: Symone Lashon Causey

On or about October 9, 2016, in the County of Blue Earth, said Defendant Symone Lashon Causey did, physically assault a peace officer when that officer was effecting a lawful arrest or executing any other duty imposed by law.

COUNT II

Charge: Obstruct Legal Process-Interfere w/Peace Officer

Minnesota Statute: 609.50.1(2), with reference to: 609.50.2(2)

Maximum Sentence: 1 year and/or \$3,000

Offense Level: Gross Misdemeanor

Offense Date (on or about): 10/09/2016

Control #(ICR#): 16030636

Charge Description: Symone Lashon Causey

On or about October 9, 2016, in the County of Blue Earth, said Defendant, Symone Lashon Causey did, intentionally, obstruct, resist, or interfere with a peace officer while the officer was engaged in the performance of official duties and the act was accompanied by force or violence or the threat thereof.

COUNT III

Charge: Liquor-Consumption by persons under 21

Minnesota Statute: 340A.503.1(a)(2), with reference to: 340A.703

Maximum Sentence: 90 days and/or \$1,000

Offense Level: Misdemeanor

Offense Date (on or about): 10/09/2016

Control #(ICR#): 16030636

Charge Description: Symone Lashon Causey

On or about October 9, 2016, in the County of Blue Earth, said Defendant, Symone Lashon Causey did, while under the age of 21 years, consume an alcoholic beverage.

STATEMENT OF PROBABLE CAUSE

Mankato Department of Public Safety Police Officer Jacob Price states that on October 9, 2016, at approximately 12:57 a.m., he and Officers Dan Grassmann and Kelly Wood were on downtown foot patrol when they were approached by security personnel from Rounders who provided information that an individual, later identified as Anthony Charles Andrews, had presented a fictitious Minnesota identification card. Andrews became upset when it was confiscated. With Andrews were two females, subsequently identified as Brittany Brenae Hodges and Symone Lashon Causey. All three individuals were under 21 years of age.

Rounders security personnel escorted the officers to the three individuals and when they arrived in the area, Andrews began walking away. Officers were able to catch up with Andrews. The Minnesota I.D. card presented the name of a different individual with an age over 21 years of age.

Andrews was escorted from the entrance of Rounders and asked to have a seat in the courtyard area. Officer Grassmann noted that there were numerous facial differences along with height and weight differences from Andrews and the person listed on the I.D. card. Officer Grassmann asked Andrews for his name and date of birth, and he provided no response. He asked a second time and after a five-second delay, he responded, 'Anthony.' When he asked for his last name, he responded with 'Andrews.' When he asked for his date of birth, there was no response. It appeared that Andrews was being deceptive in his answers and looking around.

Officer Grassmann asked Andrews to stand up, and he complied but he immediately crossed his hands together in front of him. Andrews was asked to put his hands behind his back, but he refused to do so. While holding onto Andrews' right arm, Officer Grassmann felt that he was tense and rigid in nature and was applying pressure towards his hands and forearm areas. Andrews was told to stop tensing and told to put his hands behind his back, and he refused.

Officer Grassmann instructed Officers Wood and Price to assist in taking Andrews to the ground to assist in detaining him. Upon hearing this, Andrews took a step forward and tried to break free from the grasp of Officer Grassmann. Andrews was taken to the ground, and Officer Grassmann ended up on his right side with Officer Price over the top of him. Upon landing on the ground, Officer Grassmann observed a female, subsequently identified as Causey, in the corner of his eye, trying to kick and grab at Officer Grassmann. He instructed her to stay back, at which time Officer Price intervened and took hold of her.

Officer Grassmann attempted to get Andrews' arm behind his back, but he was able to shift his weight of his full body towards his direction, which caused him to lose his grip on his arm. Andrews then, from his knees, lunged forward and grabbed on to Officer Grassmann's upper body. Officer Grassmann noted he was in a kneeling position with one leg on the ground when Andrews lunged at him. As a result, Officer Grassmann was knocked backwards onto his back with Andrews landing on top of him. Andrews placed his right forearm into the chest area of Officer Grassmann and he could hear him grunting. Based upon his location and the position he was in, Officer Grassmann felt threatened. With his left hand free, he started punching Andrews about the face and head region with his left hand while he tried to pull out his taser with his right hand. As this was taking place, other Rounders staff assisted in trying to get Andrews off of Officer Grassmann. The two staff members were able to get Andrews' body somewhat off of Officer Grassmann's person, and Officer Grassmann placed him in a headlock as he waited for other officers to arrive. Andrews was advised several times to stop resisting and fighting.

During his contact with Andrews, Officer Grassmann smelled the odor of an alcoholic beverage coming from his person and noted that his eyes were dilated in nature. In addition, Officer Grassmann received

injury to his left knuckles, including middle and ring finger and right elbow.

Officer Price noted that while they were attempting to detain Andrews on the ground, Causey proceeded to push him. Doing so forced him to move forward onto Andrews and forced him to loosen his grip. Causey also grabbed onto Officer Grassmann's shoulder in an attempt to pull him off of Andrews. Officer Price observed a Rounders staff member pull Causey back from Officer Grassmann. Officer Price proceeded to get up and grabbed onto Causey and told her she was under arrest. Causey attempted to pull away several times and did not listen to verbal commands.

As he was escorting Causey, Officer Price noted that Hodges grabbed onto his chest and shoulder and she also grabbed onto Causey. When Hodges grabbed onto officer's chest and shoulder, she pushed him back in an attempt to stop them from walking. Officer Price then grabbed hold of Hodges and informed her that she was under arrest as well. While escorting both Causey and Hodges, they attempted to break free from Officer Price's grip and tried to walk away several times. Officer Price was able to get them to the squad car and force them up against the squad car and waited for additional units.

While dealing with Causey and Hodges, Officer Price detected a strong odor of an alcoholic beverage emitting from their breath. He noted that some of their words were slurred and both of their eyes were watery. Causey submitted to a preliminary breath test which resulted in a reported reading of 0.107. Hodges and Andrews both refused to provide a preliminary breath sample.

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

Craig Frericks
Commander
710 S Front St
Mankato, MN 56001-3803
Badge: 3102

Electronically Signed:
10/10/2016 11:52 AM
Blue Earth County, Minnesota

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

Prosecuting Attorney

Michael Hanson
Assistant County Attorney
401 Carver Road
PO Box 3129
Mankato, MN 56002
(507) 304-4600

Electronically Signed:
10/10/2016 11:43 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 401 Carver Rd, Mankato, MN 56002-0347 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: \$
Conditions of Release:

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: October 10, 2016.

Judicial Officer

Bradley C Walker
District Court Judge

Electronically Signed: 10/10/2016 12:56 PM

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

**COUNTY OF BLUE EARTH
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

SYMONE LASHON CAUSEY

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: