

STATE OF MINNESOTA, COUNTY OF HENNEPIN

DISTRICT COURT

APPLICATION FOR SEARCH WARRANT

I, Brandon Johnson, a licensed peace officer in the State of Minnesota, make an application to this Court for a warrant to search the premises described below, for the property and thing(s) described below.

I know the content of this application and affirm that the statements contained in this application are true based on my own knowledge, or are believed to be true.

I believe that the following described property and thing(s), namely:

- I. Documents or items demonstrating the purchase or sale of firearms, ammunition, and items associated with the use and storage of firearms;**

Firearms or ammunition;

Packaging materials, both used and unused, for firearms, ammunition, and related accessories such as magazines or storage cases;

Books, records, receipts, notes, ledgers and other papers relating to the transportation, storage, ordering, purchase, or distribution of firearms, ammunition and related accessories, including such items in electronic format;

Notes, emails, letters, text messages, or other communications related to the purchase or sale of firearms, ammunition, and related accessories;

Photographs, including still photos, negatives, video tapes, films, slides; specifically photographs of co-conspirators, assets, firearms and ammunition, including such items in electronic format;

Indicia of ownership or control of the Subject Residence, including but not limited to papers, traffic tickets, receipts, and personal belongings.

is or are at the premises described as:

9961 Lee Drive, a single family residence

located in city or township of Eden Prairie, County of Hennepin, State of Minnesota.

I apply for a search warrant on the following grounds:

- The property or things above-described is in the possession of a person with intent to use such property as a means of committing a crime, or the property or things so intended to be used are in the possession of another to whom they have been delivered for the purpose of concealing them or preventing their being discovered.
- The property or things above-described constitutes evidence which tends to show a crime has been committed, or tends to show that a particular person has committed a crime.

The facts establishing the grounds for issuance of a search warrant are as follows:

Your affiant is a Special Agent with the Minnesota Bureau of Criminal Apprehension, and had been a peace officer in the State of Minnesota since 2005. Affiant has more than ten years of experience as a criminal investigator, most recently as a task force officer with the FBI's Twin Cities Safe Streets Task Force as a narcotics and violent crimes investigator.

Affiant has relied on several sources of information in obtaining the probable cause laid out below. Affiant has no reason to doubt the information provided him, and had relied on sources such as these in the past in obtaining information that constituted probable cause in other criminal investigations.

On the evening December 30, 2020, the members of the Minneapolis First Precinct

Community Response Team (CRT) were attempting to conduct a purchase of a handgun using a confidential informant (CI) from a person selling firearms illegally and prohibited from possessing firearms. Affiant learned from MPD Lt. Schoenberger that the CRT used the services of a CI in an attempt to purchase MAC-10 high capacity pistol from the suspect. According to Lt. Schoenberger, the CI stated the suspect had additional firearms at his residence.

The suspect arrived at the scene in a white Chevrolet Cobalt (Minn. AFW078) with a female passenger. When the team moved in to arrest the suspect, a gunfight ensued, and the suspect was killed at the scene. According to initial reports, the suspect fired at the officers. BCA crime scene personnel at the scene of the shooting observed a black and silver handgun between suspect's body and the center console of the vehicle.

BCA agents later interviewed the female passenger who is the owner of the vehicle. The passenger told investigators that she is the girlfriend of the suspect and only knows him as "Bird." The Eden Prairie Police crime analyst knows that Dolal Bayle Idd (DOB 7/18/1997) uses that nickname and has a weapons history. She said she has been to Idd's house in Eden Prairie. She indicated she and Idd would enter through the back where Idd lives in the basement of the house. The EPPD crime analyst told Affiant that Dolal Idd lives at 9961 Lee Drive, and his driver's license lists that same address.

Hennepin County property records show Bayle Gelle at the owner of the house. A call history for this address conducted by Eden Prairie Police shows several calls for service, including a weapons offense from 2018. 9961 Lee Drive is also the listed address of Mohamed Bayle Idd, who was recently arrested by Bloomington police for a homicide involving a firearm.

According to ATF reports, Dolal Idd is listed as a possessor of stolen 12-gauge shotgun in a 2018 case, he has a criminal history showing arrests for weapons violations and narcotics. Affiant believes based on the events of December 30, 2020, his weapons history and that of other residents, as well as his use of 9961 Lee Drive as his residence, weapons will likely be located inside the residence.

Based on the hour this information was received by Affiant, the ongoing nature of both the weapons investigation and the officer involved shooting, the likely presence of firearms, as well as the potential for evidence to be moved or destroyed when family learns of Idd's death, Affiant requests a nighttime warrant.

A nighttime search outside the hours of 7 a.m. to 8 p.m. is necessary to prevent the loss, destruction or removal of the objects of the search or to protect the searchers or the public because Based on the hour this information was received by Affiant, the ongoing nature of both the weapons investigation and the officer involved shooting, the likely presence of firearms, as well as the potential for evidence to be moved or destroy when family learns of Idd's death, Affiant requests a nighttime warrant.

I request a search warrant be issued, commanding Brandon Johnson, Jeff Kirchoff, Christian Jung, and other Hennepin County Sheriff's Office and BCA personnel, peace officers of the State of Minnesota, and any other authorized person, to enter and search between the hours of 7 a.m. and 8 p.m., and a nighttime search outside those hours, to search the above described premises for the described property and thing(s), and to seize and keep said property and thing(s) in custody until dealt with according to law.

I declare under penalty of perjury that everything stated in this document is true and correct.

Applicant: Brandon Johnson
Minnesota Bureau of Criminal
Apprehension
Electronically Signed
12/31/2020 12:13 AM
Hennepin County, Minnesota

STATE OF MINNESOTA, COUNTY OF HENNEPIN

DISTRICT COURT

SEARCH WARRANT

TO: BRANDON JOHNSON, JEFF KIRCHOFF, CHRISTIAN JUNG, AND OTHER HENNEPIN COUNTY SHERIFF'S OFFICE AND BCA PERSONNEL PEACE OFFICERS OF THE STATE OF MINNESOTA.

WHEREAS, Brandon Johnson has this day on oath made an application to this Court for a warrant to search the following described premises :

9961 Lee Drive, a single family residence

located in city or township of Eden Prairie, State of Minnesota for the following described property and thing(s):

- I. Documents or items demonstrating the purchase or sale of firearms, ammunition, and items associated with the use and storage of firearms;**

Firearms or ammunition;

Packaging materials, both used and unused, for firearms, ammunition, and related accessories such as magazines or storage cases;

Books, records, receipts, notes, ledgers and other papers relating to the transportation, storage, ordering, purchase, or distribution of firearms, ammunition and related accessories, including such items in electronic format;

Notes, emails, letters, text messages, or other communications related to the purchase or sale of firearms, ammunition, and related accessories;

Photographs, including still photos, negatives, video tapes, films, slides; specifically photographs of co-conspirators, assets, firearms and ammunition, including such items in electronic format;

Indicia of ownership or control of the Subject Residence, including but not limited to papers, traffic tickets, receipts, and personal belongings.

WHEREAS, the application of Brandon Johnson was duly presented and read by the Court, and being fully advised in the premises.

NOW, THEREFORE, the Court finds that probable cause exists for the issuance of a search warrant upon the following ground(s):

- The property or things above-described is in the possession of a person with intent to use such property as a means of committing a crime, or the property or things so intended to be used are in the possession of another to whom they have been delivered for the purpose of concealing them or preventing their being discovered.
- The property or things above-described constitutes evidence which tends to show a crime has been committed, or tends to show that a particular person has committed a crime.

The court further finds that probable cause exists to believe that the above-described property and thing(s) is or are at the above-described premises

(End of Page)

The court further finds that a nighttime search outside the hours of 7 a.m. to 8 p.m. is necessary to prevent the loss, destruction, removal of the objects of said search, or to protect the safety of the searchers or the public.

NOW, THEREFORE, you Brandon Johnson, Jeff Kirchoff, Christian Jung, and other Hennepin County Sheriff's Office and BCA personnel, peace officers of the State of Minnesota, and any other authorized person, are hereby commanded to enter and search between the hours of 7 a.m. and 8 p.m., and a nighttime search outside those hours, to search the above-described premises, for the described property and thing(s), and to seize and keep said property and thing(s) in custody until dealt with according to law.

BY THE COURT

ISSUED ON: 31 December, 2020

Judicial Officer: Peter A Cahill

Judge of District Court

Electronically Signed

12/31/2020 12:20 AM

