

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 22A01997  
Court File No. 27-CR-22-3553

State of Minnesota,

Plaintiff,

vs.

**WILLIAM LEE NABORS DOB: 12/10/1970**

Defendant.

**COMPLAINT**

Summons

☒ Amended

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-1st Degree-Great Bodily Harm**

Minnesota Statute: 609.221.1, with reference to: 609.05.1, 609.05.2, 609.101.2, 609.221.1

Maximum Sentence: 20 YEARS AND/OR \$30,000

Offense Level: Felony

Offense Date (on or about): 02/22/2022

Control #(ICR#): 22038239

Charge Description: That on or about 2/22/2022, in Hennepin County, Minnesota, WILLIAM NABORS, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with ASHLEY OAKGROVE and SAMUEL HAWKINS, or otherwise procures the other to commit the crime, assaulted P.O.B. and inflicted great bodily harm.

**COUNT II**

**Charge: Assault-3rd Degree-Substantial Bodily Harm**

Minnesota Statute: 609.223.1, with reference to: 609.223.1, 609.05.1, 609.05.2, 609.101.2

Maximum Sentence: 5 YEARS AND/OR \$3,000-\$10,000

Offense Level: Felony

Offense Date (on or about): 02/22/2022

Control #(ICR#): 22038239

Charge Description: That on or about 2/22/2022, in Hennepin County, Minnesota, WILLIAM NABORS, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with ASHLEY OAKGROVE and SAMUEL HAWKINS, or otherwise procures the other to commit the crime, assaulted P.O.B. and inflicted substantial bodily harm.

## STATEMENT OF PROBABLE CAUSE

COMPLAINT AMENDED WITH ADDITIONAL PROBABLE CAUSE LANGUAGE TO SUPPORT THE CHARGES.

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

On February 22, 2022, at approximately 8:17 pm, officers were dispatched to an assault that occurred at a parking ramp located at 1001 2nd Avenue S. in Minneapolis, Hennepin County, Minnesota. Remarks of the call indicated that security staff observed a male getting assaulted while monitoring security cameras and that EMS was needed.

Officers arrived and were directed by staff to a lower level of the building. Officers observed the male victim on the ground being treated to by Fire Department personnel. Victim was unconscious and covered in his own blood from an apparent head injury.

Officers went to the camera room and spoke with the reporting party, L.M., who was locating footage of the assault. Officers reviewed the footage. The footage shows five individuals who appear to be looking for Victim. Victim can be seen looking around a corner, attempting to hide, before he eventually lays on the floor. Two parties, later identified as SAMUEL LEE HAWKINS (DOB 08/28/1981) and ASHLEY JEWEL OAKGROVE (DOB 08/02/1990), then find Victim.

The footage shows a male, later identified as SAMUEL LEE HAWKINS (DOB 08/28/1981), locate Victim then begin to stomp/kick him in the head approximately six times. HAWKINS then motions for someone to come over. A female, later identified as ASHLEY JEWEL OAKGROVE (DOB 08/02/1990) and a second male, later identified as WILLIAM LEE NABORS (DOB 12/10/1970), come over. HAWKINS then drags Victim out more towards the lobby where he kicks Victim in the head again. OAKGROVE is present during the assault and eventually takes Victim's boots off. Victim appears to be unconscious. HAWKINS kicks Victim in the head again as OAKGROVE is removing Victim's boots.

NABORS walks into the frame as HAWKINS stomps on Victim's head and OAKGROVE removes his boots. NABORS picks up Victim's boots and looks at Victim, whose head has begun bleeding. HAWKINS drags Victim more and leaves him facedown on the ground. OAKGROVE then kicks Victim in the head. HAWKINS and OAKGROVE then appear to be taking Victim's clothes off and going through his pockets as NABORS stands by. HAWKINS kicks Victim in the head one more time before the parties all leave.

Additional footage shows HAWKINS give the tan hat he was wearing to OAKGROVE to put in her backpack. HAWKINS is given a different hat by OAKGROVE.

Officers located the parties in the area and took them into custody. Officers observed fresh blood on HAWKINS's boots.

In a post-Miranda statement, OAKGROVE told officers that Victim had assaulted her in the past and on this day, HAWKINS beat up Victim. OAKGROVE also admitted to kicking Victim and taking his boots off and handing them to another party.

In a post-Miranda statement, HAWKINS told officers that Victim had assaulted OAKGROVE the day prior. HAWKINS stated that OAKGROVE called him and requested that he beat Victim up. HAWKINS admitted to kicking the Victim in the head multiple times. HAWKINS stated that he did not want to get in trouble, so he put a different hat on in the elevator.

VICTIM'S MEDICAL RECORDS SHOW THAT HE WAS UNRESPONSIVE WHEN HE ARRIVED AT HCMC ON FEBRUARY 22, 2022. VICTIM'S LEVEL OF CONSCIOUSNESS WAS MEASURED USING THE GLASGOW COMA SCALE ("GCS"). GCS IS THE SUMMATION OF SCORES FOR EYE, VERBAL, AND MOTOR RESPONSES. THE MINIMUM SCORE IS A 3, WHICH INDICATES DEEP DORMA OR A BRAIN-DEAD STATE. VICTIM SCORED A 3. VICTIM WAS INTUBATED.

IN ADDITION TO FACIAL TRAUMA, VICTIM WAS SUFFERED A TRAUMATIC BRAIN INJURY AND HAS HAD DELAYED COGNITIVE RECOVERY FOLLOWING EXTUBATION.

VICTIM REMAINED IN AN OBTUNDED STATE WITH A DECREASED LEVEL OF CONSCIOUSNESS OVER THE NEXT SEVERAL WEEKS. AS OF MARCH 3, 2022, VICTIM IS UNABLE TO SPEAK COHERENTLY, REQUIRES A FEEDING TUBE, AND IS INCONTINENT OF BOWEL AND BLADDER. AS OF MARCH 3, 2022, VICTIM REQUIRED 24 HOUR ASSISTANCE DUE TO HIS COGNITIVE AND PHYSICAL LIMITATIONS FOLLOWING THE ASSAULT.

CO-DEFENDANTS HAWKINS, OAKGROVE, AND NABORS ARE IN CUSTODY.



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## 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**

Bryce Robinson  
Sgt.  
350 S 5th St  
Minneapolis, MN 55415-1389  
Badge: 6062

Electronically Signed:  
03/17/2022 09:28 AM  
Hennepin County, Minnesota

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

**Prosecuting Attorney**

Natasha Yenina  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
03/16/2022 04:08 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).

### ☒ SUMMONS

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 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: \$150,000.00

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: March 17, 2022.

**Judicial Officer**

Thomas J Conley  
Judge

Electronically Signed: 03/17/2022 03:49 PM

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

COUNTY OF HENNEPIN  
STATE OF MINNESOTA

**State of Minnesota**

Plaintiff

vs.

**WILLIAM LEE NABORS**

Defendant

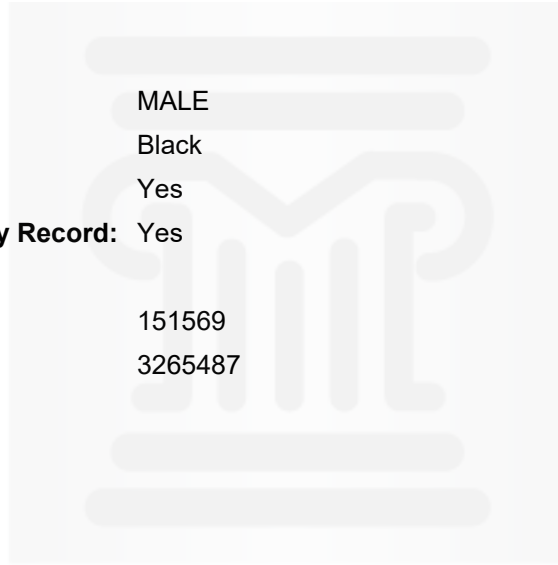
**LAW ENFORCEMENT OFFICER RETURN OF SERVICE**

*I hereby Certify and Return that I have served a copy of this  
Summons upon the Defendant herein named.*

Signature of Authorized Service Agent:

## DEFENDANT FACT SHEET

**Name:** WILLIAM LEE NABORS  
**DOB:** 12/10/1970  
**Address:**  
**Alias Names/DOB:**  
**SID:** MN91014326  
**Height:**  
**Weight:**  
**Eye Color:**  
**Hair Color:**  
**Gender:** MALE  
**Race:** Black  
**Fingerprints Required per Statute:** Yes  
**Fingerprint match to Criminal History Record:** Yes  
**Driver's License #:**  
**SILS Person ID #:** 151569  
**SILS Tracking No.** 3265487  
**Alcohol Concentration:**



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## STATUTE AND OFFENSE GRID

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	2/22/2022	609.221.1 Assault-1st Degree-Great Bodily Harm	Felony	A1151	X	MN0271100	22038239
	Modifier	2/22/2022	609.05.1 Liability for Crimes of Another-Intentional	No-Level	A1151	X	MN0271100	22038239
	Modifier	2/22/2022	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	A1151	X	MN0271100	22038239
	Definition	2/22/2022	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A1151	X	MN0271100	22038239
	Penalty	2/22/2022	609.221.1 Assault-1st Degree-Great Bodily Harm	Felony	A1151	X	MN0271100	22038239
2	Charge	2/22/2022	609.223.1 Assault-3rd Degree-Substantial Bodily Harm	Felony	A3251	X	MN0271100	22038239
	Penalty	2/22/2022	609.223.1 Assault-3rd Degree-Substantial Bodily Harm	Felony	A3251	X	MN0271100	22038239
	Modifier	2/22/2022	609.05.1 Liability for Crimes of Another-Intentional	No-Level	A3251	X	MN0271100	22038239
	Modifier	2/22/2022	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	A3251	X	MN0271100	22038239
	Definition	2/22/2022	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A3251	X	MN0271100	22038239

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