State of Minnesota County of Hennepin

District Court 4th Judicial District

Prosecutor File No.
Court File No.

22A01997 27-CR-22-3553

State of Minnesota,

COMPLAINT

Plaintiff,

Order of Detention

VS.

WILLIAM LEE NABORS DOB: 12/10/1970

Defendant.

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

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 see 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 HWAKINS stomps on Victim's head and OAKGROVE removes his boots. NABORS picks up Victim's boots and loots 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.

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: 02/24/2022 12:11 PM

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: 02/24/2022 12:09 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)

pending further proceedings. Defendant is the	refore charged with the above-s	stated offense(s).				
	SUMMONS					
THEREFORE YOU, THE DEFENDANT, AF above-named court to answer this complaint.	RE SUMMONED to appear a	s directed in the Notice of Hearing before the				
IF YOU FAIL TO APPEAR in response to this	SUMMONS, a WARRANT FOR	R YOUR ARREST shall be issued.				
	WARRANT					
of Minnesota, that the Defendant be apprehe	ended and arrested without d	cute this warrant: I order, in the name of the State elay and brought promptly before the court (if ir innecessary delay, and in any event not later than able to be dealt with according to law.				
Execute in MN Only	Execute Nationwide	Execute in Border States				
X	ORDER OF DETENTIO	N				
Since the Defendant is already in custody, I detained pending further proceedings.	order, subject to bail or condition	ons of release, that the Defendant continue to be				
Bail: \$150,000.00 Conditions of Release:						
This complaint, duly subscribed and sworn to as of the following date: February 24, 2022.	or signed under penalty of perju	ury, is issued by the undersigned Judicial Officer				
Judicial Officer Gina Brandt District Court	Electronically Signed: 02/24/2022 12:19 PM					
Sworn testimony has been given before the Ju	udicial Officer by the following w	vitnesses:				
	OF HENNEPIN OF MINNESOTA					
State of Minnesota						
Plaintiff vs.	I hereby Certi	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.				
WILLIAM LEE NABOR	RS —	Signature of Authorized Service Agent:				
Defendant						

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

Black Race: **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:

STATUTE AND OFFENSE GRID

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	мос	GOC	Controlling Agencies	Case Numbers
1	Charge	2/22/2022	609.221.1 Assault-1st Degree-Great Bodily Harm	Felony	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	Х	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	Х	MN0271100	22038239
2	Charge	2/22/2022	609.223.1 Assault-3rd Degree-Substantial Bodily Harm	Felony	A3251	Х	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
	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

MINNESOTA JUDICIAL BRANCH