

State of Minnesota  
County of Ramsey

District Court  
2nd Judicial District

Prosecutor File No.  
Court File No.

17-320241

---

**State of Minnesota,**

Plaintiff,

**COMPLAINT**

Summons

vs.

**STARR ANTOINETTE VANN-JACKSON DOB: 08/04/1996**

179 N. Kent Street  
St. Paul, MN 55104

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: Use Tear Gas/Stun Gun**

Minnesota Statute: 624.731.4(b)

Maximum Sentence:

Offense Level: Gross Misdemeanor

Offense Date (on or about): 03/04/2017

Control #(ICR#): 17401974

Charge Description: Defendant did use tear gas, a tear gas compound, an authorized tear gas compound, or an electronic incapacitation device.

**COUNT II**

**Charge: Riot 3rd Degree**

Minnesota Statute: 609.71.3

Maximum Sentence: 0 to 1 year imprisonment; \$0 to \$1000 fine.

Offense Level: Gross Misdemeanor

Offense Date (on or about): 03/04/2017

Control #(ICR#): 17401974

Charge Description: Defendant did participate in an assembly of three or more persons and defendant or a member of the assembly did disturb the public peace by an intentional act or threat of unlawful force or violence to person or property.

## STATEMENT OF PROBABLE CAUSE

The Complainant having reviewed the applicable reports believes the following facts to be true:

---

On March 4, 2017 at approximately 12:00 p.m., a rally in support of President Trump was held at the State Capitol, 75 Rev. Dr. Martin Luther King, Jr. Blvd., St. Paul, Ramsey County, MN. As the rally was starting, approximately 75-125 anti-Trump protesters gathered at Leif Erickson Park, just south of University Avenue and east of Rice Street, near the light rail station. At approximately 12:15 p.m., the protesters began to march toward the south side of the Capitol. Approximately ten minutes later, the protesters arrived at the Capitol and entered the building. Officers observed that at least 5-7 of the protesters were dressed all in black and had their faces covered with masks or black cloth. Some were also wearing goggles or other eye coverings. Capitol Security Officers monitoring video cameras also observed and recorded at least five individuals entering the Capitol who were dressed in black, with hoods over their heads, goggles covering their eyes, and their faces covered with masks or black cloth.

The protesters began chanting, yelling, blowing whistles, using air horns, and confronting the Trump supporters. At approximately 12:30 p.m., Capitol Security Officers Roger Dirks and Doug Porath both saw smoke near the hallway north of the west steps. Security Officer Dirks described that a Trump supporter pointed out a person in all black with goggles on and stated that the person had thrown a smoke bomb into the crowd of Trump supporters.

As officers followed and ultimately arrested those suspected of being involved in throwing the smoke bomb, other protesters moved to the stairs on the west side of the building that went from the second floor to the rotunda. As the protesters came down the stairs, rally participants formed a wall at the bottom of the stairway to stop the protesters from going into the rotunda. Tensions escalated, with both sides chanting and yelling at each other. Some of the protesters were continually trying to push their way past the wall of rally participants. A protester sprayed mace at rally participants, ran up the stairs, ran back down when he saw a trooper, pushed his way through both groups on the stairs, and fought with the trooper who caught him as he tried to flee, breaking the trooper's thumb.

According to witnesses, some protesters on the stairs had their faces covered with masks or cloth. One of the protesters was a young African American person wearing goggles and a dark jacket with white sleeves. Police officers later analyzed photos of the protesters on the stairs and identified that person as Starr Antoinette Vann-Jackson (dob 8-4-96, aka Austin Marcus Jackson), the defendant herein.

As tensions continued at the base of the stairs, a protester sprayed mace into the face of a rally participant. As that rally participant bent over, another rally participant, T.P., was sprayed by a different protester, later identified as Francis Sager-Merek (dob 1-27-98). T.P. described that he went backward down a step or two then was stunned by a stun gun on the shoulder by a person matching the description of the defendant. T.P. stated that the defendant had pushed and held the stun gun against T.P.'s shoulder and that it had left a red mark. At least four other witnesses also saw the defendant with the stun gun, and video has the sound of a stun gun sparking before the video moves to show the defendant holding a stun gun and withdrawing it from the direction of a rally participant as the stun gun sparks. The first protester who sprayed a rally participant, Sager-Merek, and the defendant all used their chemical spray or stun gun within moments of each other and all three were in close proximity with each other on the first few steps of the stairway when they did so. Each also used their spray or stun gun directly against at least one of the rally participants blocking their way to the rotunda of the Capitol.

## 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**

Eric Zastrow  
State Trooper  
3489 Hadley Ave N  
Oakdale, MN 55128  
Badge: 85

Electronically Signed:  
05/26/2017 08:25 AM  
Washington County, MN

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

**Prosecuting Attorney**

Tamara Larsen  
Assistant City Attorney  
15 Kellogg Blvd W., Suite 500  
St Paul, MN 55102  
(651) 266-8740

Electronically Signed:  
05/26/2017 08:05 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 **August 10, 2017 at 12:30 PM** before the above-named court at 15 W Kellogg Blvd, St Paul, MN 55102 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: May 26, 2017.

**Judicial Officer**

Laura Nelson

Electronically Signed: 05/26/2017 10:04 AM

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

**COUNTY OF RAMSEY  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**Starr Antoinette Vann-Jackson**

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: