## State of Minnesota County of Hennepin

### District Court 4th Judicial District

Prosecutor File No.
Court File No.

21A04372 27-CR-21-8343

State of Minnesota,

COMPLAINT

Plaintiff,

Order of Detention

VS.

CAMERON ONEAL CLARK DOB: 01/11/1991

1818 Bryant Ave N Apt 7 Minneapolis, MN 55411

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: Murder-Unborn Child-2nd Deg-Not Premeditated

Minnesota Statute: 609.2662(1), with reference to: 609.2662, 609.11.5(a), 609.17.4(2)

Maximum Sentence: 40 YEARS, HALF OF

Offense Level: Felony

Offense Date (on or about): 04/16/2021

Control #(ICR#): 21079430

Charge Description: That on or about April 16, 2021, in Hennepin County, Minnesota, Cameron Oneal Clark, attempted to cause the death of an unborn child, with intent to effect the death of that person, or another, without premeditation, while possessing a firearm.

Minimum Sentence: 3 YEARS

#### **COUNT II**

Charge: Aggravated Robbery-1st Degree

Minnesota Statute: 609.245.1, with reference to: 609.245.1, 609.11.5(a), 609.05.1, 609.05.2

Maximum Sentence: 20 YEARS AND/OR \$35,000

Offense Level: Felony

Offense Date (on or about): 04/16/2021

Control #(ICR#): 21079430

Charge Description: That on or about April 16, 2021, in Hennepin County, Minnesota, Cameron Oneal Clark, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another, or otherwise procures the other to commit the crime, took personal property from the person or in the presence of known-adult Victim, knowing that he was not entitled to the property and used and/or threatened the imminent use of force against Victim to overcome her resistance or powers of resistance to

State of Minnesota or to compel acquiescence in the taking or carrying away of the property, and inflicted bodily harmy/24/2002/1 Victim while possessing a firearm.

Minimum Sentence: 3 YEARS



#### STATEMENT OF PROBABLE CAUSE

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

On April 16, 2021, officers with the Minneapolis Police Department received a walk-in report of an aggravated robbery that occurred at an apartment complex, located at 12XX Banneker Avenue, Minneapolis, Hennepin County, Minnesota.

Specifically, a known-adult Victim told officers that she went to meet up with the father of her unborn child, identified as CAMERON ONEAL CLARK (DOB: 1/11/1991; hereinafter "Defendant Clark"), when she was maced by a woman, subsequently identified as TANISHA AMIEA MARIE DUNN (DOB: 7/15/1984; "Defendant Dunn"). After being maced, Victim grabbed for her firearm in an attempt to defend herself, but Defendant Clark then came up from behind her and tased Victim on the left side of her abdomen. Both Defendants began to beat Victim. They punched and kicked her, targeting Victim's abdomen. Victim is 6 months pregnant.

After they were done beating her, Defendants stole Victim's firearm and cell phone before fleeing out of the apartment. Victim walked to a nearby store and called her uncle for a ride to the police precinct. Victim received medical care and was diagnosed with a broken rib. Her baby still appeared to have a heartbeat, and no ruptures or internal bleeding were noted. Medical records were requested.

Officers obtained video surveillance of the assault. The video has good resolution and shows events consistent with Victim's report. The video also shows Defendant Clark methodically circle around Victim, so he faces her stomach. Once her stomach is exposed, he braces himself against the wall and kicks her directly in the stomach. Defendants strike Victim an innumerable number of times with their fists, feet, and eventually a taser.

Law enforcement executed a search warrants for Defendants' apartments and Defendant Clark's vehicle. Numerous items were seized, including a large amount of US currency and two bottles of mace.

In subsequent interviews, Victim stated she met Defendant Clark in approximately February of 2019. The two had a sporadic sexual relationship until November 2020 when Victim became pregnant with Defendant Clark's child. After learning of the pregnancy, Defendant Clark constantly pressured Victim to have an abortion. He would also make threats about having people jump her to make her lose the baby. Victim recalled him saying, "I'm gonna get somebody to stomp that baby out of you."

Defendants are in custody.

Defendant Clark has a lengthy criminal history, including four open drug cases (See Court File Numbers: 27-CR-20-6193, 27-CR-19-5275, 27-CR-18-30152 and 27-CR-18-29983) During the execution of the search warrant at his home, officers also located contraband and items associated with drug sale. The firearm was not located. Given the severity of the offense and Defendant Clark's risk to public safety, the State is requesting high bail.

#### 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

Christopher Flack

Officer

350 S 5th St

Minneapolis, MN 55415-1389

Badge: 2021

Electronically Signed:

04/29/2021 03:17 PM

Hennepin County, MN

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

**Prosecuting Attorney** 

Leah Erickson

300 S 6th St

Minneapolis, MN 55487

(612) 348-5550

Electronically Signed: 04/29/2021 03:10 PM



#### Filed in District Court State of Minnesota 4/29/2021

#### 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,

•		efore charged with the above	ve-stated offense(s).
		SUMMONS	
THEREFORE YOU, TH above-named court to an		E SUMMONED to appea	r as directed in the Notice of Hearing before the
IF YOU FAIL TO APPEA	R in response to this S	SUMMONS, a WARRANT F	FOR YOUR ARREST shall be issued.
		WARRANT	
of Minnesota, that the D session), and if not, before	efendant be appreher re a Judge or Judicial	nded and arrested withou Officer of such court witho	execute this warrant: I order, in the name of the State at delay and brought promptly before the court (if in ut unnecessary delay, and in any event not later than railable to be dealt with according to law.
☐ Execute	in MN Only	Execute Nationwide	Execute in Border States
	X	ORDER OF DETENT	TION
Since the Defendant is a detained pending further		rder, subject to bail or con	ditions of release, that the Defendant continue to be
		No Contact with Co-Defer ing; Make All Appearances	ndant(s); No Possession of Weapons; No use of s; Other: DANCO
This complaint, duly subs		r signed under penalty of p	erjury, is issued by the undersigned Judicial Officer
Judicial Officer	Officer Luis Bartolomei District Court Judge		Electronically Signed: 04/29/2021 03:33 PM
Sworn testimony has bee	en given before the Jud	licial Officer by the followin	g witnesses:
		OF HENNEPIN F MINNESOTA	
State	of Minnesota		
	Plaintiff vs.		NFORCEMENT OFFICER RETURN OF SERVICE Certify and Return that I have served a copy of this Order of Detention upon the Defendant herein named.

Detention upon the Defendant herein named.

Signature of Authorized Service Agent:

**Cameron Oneal Clark** 

Defendant

#### **DEFENDANT FACT SHEET**

Name: Cameron Oneal Clark

**DOB**: 01/11/1991

Address: 1818 Bryant Ave N

Apt 7

Minneapolis, MN 55411

Alias Names/DOB: Cameron Oneal Esaw Clark DOB: 1/11/1991

Cameron O'Neal Esaw Clark DOB: 1/11/1991

Cameron Oneil Clark DOB: 1/11/1991

SID: MN11EK3416

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 #:
 708542

 SILS Tracking No.
 3224887

Case Scheduling Information: \* Co-Defendant: Tanisha Amiea Dunn.

\*Defendants are in custody.

\*Defendant Clark has a lengthy criminal history, including four open drug cases (See Court File Numbers: 27-CR-20-6193, 27-CR-19-5275,

27-CR-18-30152 and 27-CR-18-29983)

**Alcohol Concentration:** 

# JUDICIAI BRANCH

#### **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	4/16/2021	609.2662(1) Murder-Unborn Child-2nd Deg-Not Premeditated	Felony	H2029	Α	MN0271100	21079430
	Penalty	4/16/2021	609.17.4(2) Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended	Felony	H2029	Α	MN0271100	21079430
	Penalty	4/16/2021	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2029	A	MN0271100	21079430
	Penalty	4/16/2021	609.2662 Murder-Unborn Child-2nd Degree	Felony	H2029	Α	MN0271100	21079430
2	Charge	4/16/2021	609.245.1 Aggravated Robbery-1st Degree	Felony	R1511	Х	MN0271100	21079430
	Modifier	4/16/2021	609.05.1 Liability for Crimes of Another-Intentional	No-Level	R1511	X	MN0271100	21079430
	Modifier	4/16/2021	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	R1511	X	MN0271100	21079430
	Penalty	4/16/2021	609.245.1 Aggravated Robbery-1st Degree	Felony	R1511	Х	MN0271100	21079430
	Penalty	4/16/2021	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	R1511	X	MN0271100	21079430

# MINNESOTA JUDICIAL BRANCH