

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 22A08367
Court File No. 27-CR-22-15418

State of Minnesota,
Plaintiff,

COMPLAINT
Warrant

vs.

CHRISTOPHER LEE KEYES DOB: 09/06/1977

6753 Black Oaks Ct
Corcoran, MN 55340

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: Criminal Vehicular Homicide - Operate Motor Vehicle in Grossly Negligent Manner

Minnesota Statute: 609.2112.1(a)(1), with reference to: 609.2112.1(a)

Maximum Sentence: 10 YEARS AND/OR \$20,000

Offense Level: Felony

Offense Date (on or about): 05/06/2022

Control #(ICR#): 22015284

Charge Description: That on or about 5/6/2022, in Plymouth, Hennepin County, Minnesota, CHRISTOPHER LEE KEYES, did by operating a motor vehicle in a grossly negligent manner, cause the death of Victim.

STATEMENT OF PROBABLE CAUSE

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

On May 6, 2022, Plymouth Police Officers were dispatched to a two car crash scene at 38th Ave. and County Road 101 in Plymouth, Hennepin County, Minnesota. Upon arriving on scene, North Memorial paramedics were actively working the crash scene. Officers observed a grey Lexus sedan with heavy front-end damage in the intersection, partially on the northeast sidewalk. The driver of the Lexus, later identified as CHRISTOPHER LEE KEYES, DOB 09/06/1977, hereinafter "Defendant," was sitting in his vehicle and the side curtain airbags were deployed. During this initial contact, Defendant appeared dazed and officers did not observe any indicia of impairment. He stated that he was driving home and the other driver turned in front of him.

Officers also observed a black Hyundai that had severe passenger side damage and was pressed up against the west/back portion of a townhome. Paramedics were providing emergency aid to the unconscious female driver, hereinafter "Victim," on the grass outside the driver's door. Both Defendant and Victim were taken to North Memorial by ambulance for further medical treatment.

Officers collected statements from three witnesses who observed Defendant's driving conduct immediately preceding the crash. They all stated they first saw the Lexus in the area of County Road 101 and County Road 24, just south of the crash site. These three witnesses were traveling northbound on County Road 101 in three separate vehicles when they each noticed the Lexus approach at a fast speed from behind. The Lexus nearly struck two of the witness's vehicles when it changed lanes between the two vehicles within feet of them. When the signal light turned green at County Road 24, all three stated the Lexus accelerated quickly and all three believed the Lexus traveling was over 100 mph. Due to the speed the Lexus was traveling, none of the witnesses were able to see how the crash occurred just ahead of them.

Sgt. Dixon, Minnesota State Patrol Crash Reconstruction Specialist, was called to the scene to conduct an investigation into the cause of the crash. Dixon collected photographs and measurements at the scene. On May 9, 2022, a Plymouth detective obtained a signed search warrant for the data that the Lexus saved in its Airbag Control Module (ACM).

On July 28, 2022, Dixon prepared a Crash Reconstruction Report for this incident. He used energy and momentum equations to attempt to calculate the speed of each vehicle throughout the crash sequence. He determined the impact speed range for the Hyundai to be between 17 and 19 mph. He calculated the impact speed for the Lexus to be between 68 and 77 mph. He found evidence that the Lexus was in threshold braking prior to impact with the Hyundai. When adding back in the energy from the threshold braking prior to impact, the speed the Lexus was traveling when it started to show evidence of braking was between 87 and 97 mph. This was 42 to 52 mph over the posted speed limit in this area of 45 mph.

Dixon also analyzed the data imaged from the memory of the ACM in the Lexus. This showed the Lexus was traveling at 95.7 mph at 4.6 seconds prior to impact. He calculated that the Lexus was 608 feet away from the Hyundai at 4.6 seconds prior to impact. He concluded that if the Lexus was traveling at the speed limit of 45 mph, it would travel 303 feet in 4.6 seconds. Using the slowest speed calculated for the Hyundai, the Hyundai would have continued an additional 115 feet. He concluded that the Hyundai would have cleared the intersection and this crash would never have occurred. Dixon opined further, "the driver of the Hyundai likely perceived the Lexus at a distance that would normally be safe to turn left. The driver did not realize the Lexus was traveling twice as fast as normal traffic in the area would be traveling." Dixon ultimately determined the primary contributing factor in this crash was the Lexus and its excessive speed at

two times the speed limit.

Victim later died as a result of injuries sustained in the crash. The Hennepin County Medical Examiner listed her immediate cause of death as multiple blunt force trauma injuries due to the crash.

Since November 2019, Defendant has had seven speeding convictions. The latest conviction was for an incident on June 3, 2022, where he drove 88 mph in a 60 mph zone---less than one month after the crash causing Victim's death. At the time of the crash, the Defendant's driving privileges in Minnesota had been revoked due to driving violations. The State is requesting a warrant due to the nature of this offense and concerns for public safety.

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

Jeff Dorfsman
Investigator
3400 Plymouth Blvd
Plymouth, MN 55447-1482
Badge: 90

Electronically Signed:
08/05/2022 12:21 PM
Hennepin County, Minnesota

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

Prosecuting Attorney

Brian Duginske
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
08/05/2022 10:45 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 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: No Driving without a License; Make All Appearances; Remain Law Abiding

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: August 5, 2022.

Judicial Officer

Mary R. Vasaly
District Court Judge

Electronically Signed: 08/05/2022 01:32 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.

CHRISTOPHER LEE KEYES

Defendant

*LAW ENFORCEMENT OFFICER RETURN OF SERVICE
I hereby Certify and Return that I have served a copy of this Warrant
upon the Defendant herein named.*

Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

Name: CHRISTOPHER LEE KEYES
DOB: 09/06/1977
Address: 6753 Black Oaks Ct
Corcoran, MN 55340

Alias Names/DOB:

SID:

Height:

Weight:

Eye Color:

Hair Color:

Gender: MALE

Race: White

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: No

Driver's License #:

SILS Person ID #: 522504

SILS Tracking No. 3289351

Alcohol Concentration:

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	5/6/2022	609.2112.1(a)(1) Criminal Vehicular Homicide - Operate Motor Vehicle in Grossly Negligent Manner	Felony	J1A11		MN0271700	22015284
	Penalty	5/6/2022	609.2112.1(a) Criminal Vehicular Homicide - Penalty	Felony	J1A11		MN0271700	22015284