

UNITED STATES DISTRICT COURT
for the
District of Minnesota

UNITED STATES OF AMERICA

v.

Case No. 22-mj-286 BRT

DOVYION DAQUAY GLASS

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about March 23, 2022, in Ramsey County, in the State and District of Minnesota, defendant,

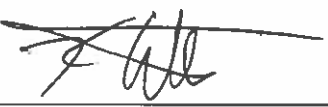
having previously been convicted of at least one crime punishable by a term of imprisonment exceeding one year, and knowing he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, that is, a Glock model 42 .380 caliber semiautomatic pistol bearing serial number AFSA330,

in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

I further state that I am a Special Agent of the Bureau of Alcohol, Tobacco, Firearms and Explosives and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: Yes No



Complainant's signature

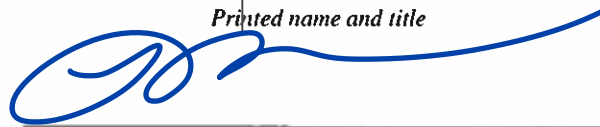
SUBSCRIBED and SWORN before me
by reliable electronic means via FaceTime, Zoom,
and email pursuant to Fed. R. Crim. P. 41(d)(3).

Kylie Williamson
ATF Special Agent

Printed name and title

Date:

April 7, 2022



Judge's Signature

City and State: St. Paul, MN

Becky R. Thorson
United States Magistrate Judge

Printed Name and Title

UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

v.

Case No. 22-mj-286 BRT

DOVYION DAQUAY GLASS

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) DOVYION DAQUAY GLASS,

who is accused of an offense or violation based on the following document filed with the court:

Indictment Superseding Indictment Information Superseding Information Complaint
 Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

On or about March 23, 2022, in Ramsey County, in the State and District of Minnesota, defendant, having previously been convicted of at least one crime punishable by a term of imprisonment exceeding one year, and knowing he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, that is, a Glock model 42 .380 caliber semiautomatic pistol bearing serial number AFSA330, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

Date: APRIL 9, 2022



Issuing officer's signature

City and State: St. Paul, MN

Becky R. Thorson
United States Magistrate Judge

Printed Name and Title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

STATE OF MINNESOTA)
)
COUNTY OF HENNEPIN) ss. AFFIDAVIT OF KYLIE WILLIAMSON

1. I am employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”), and am thus an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18 of the United States Code. I have been employed as a Special Agent by the ATF since August of 2007. Prior to that, I was employed by ATF for two years as an Industry Operations Investigator.

2. I am currently assigned to the Saint Paul Field Office. In my capacity as a Special Agent with the ATF, I have participated in numerous criminal investigations of individuals and entities related to violations of Federal Laws, particularly those under Titles 18 and 21 of the United States Code. I have received on-going training related to criminal investigations, gang investigations, drug trafficking, money laundering, undercover operations, Title III wiretaps, as well as electronic and physical surveillance procedures. I work with various law enforcement agencies and drug task forces throughout the state of Minnesota and have supervised, led, and/or otherwise been a part of hundreds of arrests and search warrants during my years as a law enforcement officer.

3. This affidavit is submitted for the limited purpose of establishing probable cause in support of issuing a complaint and arrest warrant for Dovyion Daquay GLASS for possession of a firearm by a convicted felon in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

4. This affidavit is based on my personal knowledge, as well as information I have learned from other law enforcement officers and the review of reports, written

materials, and recordings. This affidavit does not include all of the details I have learned regarding this investigation. Rather, it only includes information believed to be sufficient to establish probable cause.

PROBABLE CAUSE

5. On March 23, 2022, at approximately 7:00 a.m., officers of the St. Paul Police Department executed a state warrant to search GLASS'S residence, located at XXX Marion Street in St. Paul, Minnesota. GLASS was present during the search. GLASS had an outstanding gross misdemeanor arrest warrant from Hennepin County for violating an order of protection. There was also an outstanding Probable Cause Pick-Up order for aiding and abetting murder. St. Paul police officers arrested GLASS at his home during the execution of the warrant. Officers transported GLASS to the St. Paul Police Department.

6. At about 7:20 a.m. on the same day, officers interviewed GLASS. They first advised GLASS of his *Miranda* rights. GLASS initialed and signed the form indicating that he understood his rights, and agreed to speak to investigators. Investigators began by asking GLASS about the murder of a man named Regis Jones on March 3, 2022. GLASS denied involvement in the homicide, and indicated to investigators that he thought they were there to talk to him about something else. At about 7:42 a.m., GLASS reiterated that he did not have anything to do with a murder, but acknowledged that he did shoot a man he identified as "cuz" at a bar. GLASS said that his gun that he used was at his house (the Marion Street address that officers were searching), in his jacket pocket. GLASS said that officers had probably already found it by that point. GLASS described the gun as a "380

Glock,” and said it was in the pocket of a red Chief’s jacket by the bathroom. Investigators provided this information to the officers and investigators who were searching GLASS’s residence.

7. Officers and investigators searching the Marion Street address located a red Kansas City Chiefs jacket hanging in the hallway on the main level of the home, between the basement door and the bathroom. From the right pocket of that jacket, officers recovered a Glock pistol matching the description GLASS had provided. The firearm was a Glock model 42 .380 caliber pistol semiautomatic pistol bearing serial number AFSA330.

8. The interview continued, and GLASS made several additional statements about shooting the man at the bar. GLASS described standing in the alley across the street from Billy’s on Grand, and using the .380 that was at the house to shoot at several people as they stood in the entryway.

9. The shooting GLASS described near Billy’s on Grand (857 Grand Avenue, St. Paul, Minnesota) occurred on March 5, 2022, at about 1:44 a.m. In the incident, one man was shot in the chest. St. Paul homicide investigators obtained a warrant to obtain GLASS’s DNA. At the same time, the investigator assigned to the Billy’s on Grand shooting continued to interview GLASS. GLASS provided additional details about the shooting, and again said that his .380 Glock that officers recovered from his house was the firearm he had used during the shooting. GLASS stated that he had not intended to hit the man in the chest, but admitted that he had fired five or six rounds in the direction of three or four people who were standing near the door.

10. GLASS indicated that he had purchased the .380 Glock from someone whom

he did not identify. When the investigator asked GLASS if GLASS was legally able to carry a gun, GLASS responded that he was not.

11. I have consulted with an ATF Interstate Nexus Expert, who has determined that the Glock model 42 .380 caliber pistol semiautomatic pistol bearing serial number AFSA330 was not manufactured in the State of Minnesota. As a result, the firearm had to travel in interstate and/or foreign commerce prior to arriving in the State and District of Minnesota on March 23, 2022.

12. A DNA analysis of the firearm is pending.

13. I have researched certain available criminal history records for Dovyion Daquay GLASS. Based on my review of those records, I believe that GLASS had at least the following felony convictions prior to March 23, 2022, each of which was punishable by a term of imprisonment exceeding one year:

Offense	Place of Conviction	Date of Conviction (On or About)
Theft	Ramsey County, MN	November 17, 2009
1 st Degree Aggravated Robbery	Ramsey County, MN	July 22, 2010
Terroristic Threats	Ramsey County, MN	November 15, 2013
Attempted 1 st Degree Aggravated Robbery	Ramsey County, MN	November 15, 2013
Fleeing Police in a Motor Vehicle	Dakota County, MN	June 25, 2015
Theft of a Motor Vehicle and Fleeing Police in a Motor Vehicle	Ramsey County, MN	August 8, 2019

14. I note that these records indicated that GLASS has served prior sentences of more than one year imprisonment for an individual conviction, and therefore knew he had

been convicted of at least one offense punishable by imprisonment for a term exceeding one year.

15. Based on the information set forth above, there is probable cause to believe that Dovyion Daquay GLASS violated Title 18, United States Code, Sections 922(g)(1) and 924(a)(2), by possessing in and affecting interstate commerce a firearm after having been convicted of at least one offense punishable by imprisonment for a term exceeding one year.

Further your Affiant sayeth not.



Kylie Williamson
Special Agent, ATF

SUBSCRIBED and SWORN before me
by reliable electronic means via FaceTime and
email pursuant to Fed. R. Crim. P. 41(d)(3) on
April 4, 2022:



BECKY R. THORSON
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF MINNESOTA

