

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No.
Court File No.

24A11227

State of Minnesota,

Plaintiff,

vs.

DALE ANTHONY MASSIE JR DOB: 10/18/1974

1788 Case Ave E
St Paul, MN 55119

Defendant.

COMPLAINT

Warrant

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: Racketeering-Enterprise-Employed/Assoc/Participate

Minnesota Statute: 609.903.1(1), with reference to: 609.904.1

Maximum Sentence: 20 YEARS AND/OR \$1,000,000.00

Offense Level: Felony

Offense Date (on or about): 03/06/2023

Control #(ICR#): 20230377

Charge Description: That on or about March 6, 2023, through February 22, 2024, in Hennepin County, Minnesota, DALE ANTHONY MASSIE Jr was employed by or associated with an enterprise and intentionally conducted or participated in the affairs of the enterprise by participating in a pattern of criminal activity.

STATEMENT OF PROBABLE CAUSE

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

As described below, investigators developed substantial evidence that ARRON SCOTT KING SR. (DOB 2/21/1975); ARRON SCOTT KING JR. (DOB 2/5/1999); CORY JAY ROSILLO (DOB 4/12/1971); TYLER NICOLAUS PAANANEN-BERNECHE (DOB 4/4/1994); EMONDRE JAMES MORRISON (DOB 12/28/1996); SEAN CHARLES FIKES (DOB 10/2/1976); DALE ANTHONY MASSIE JR. (DOB 10/18/1974); and JAWAN EDWARD JACKSON (DOB 3/17/1991) committed the offense of racketeering between March 6, 2023, and February 22, 2024, through criminal acts (burglaries and thefts) committed in Hennepin County and elsewhere in Minnesota.

SUMMARY OF RACKETEERING CHARGE

The racketeering enterprise involved in this case (the “Enterprise”) is the association-in-fact of a group of persons led by KING SR. and including his seven co-defendants and others. Complainant, a special agent with Alcohol & Gambling Enforcement (AGE) in the Minnesota Department of Public Safety, investigated the Enterprise because its burglaries routinely target charitable gambling funds. The Enterprise used KING SR.’s residence on Arbor Street in Saint Paul as a hub and had as its purpose the coordination and commission of burglaries of businesses, primarily bars that reliably kept cash on site because of pull tab charitable gambling operations, but also sometimes golf courses with cash kept in safes. There is evidence that the Enterprise’s pattern of criminal activity goes back several years. The period charged as racketeering in this complaint included 44 felony second-degree and attempted second-degree burglaries and/or thefts occurring between March 6, 2023, and February 22, 2024, including 10 in Hennepin County.

Each charged member of the Enterprise is a principal with respect to conduct constituting at least three acts of felony second-degree burglary, attempted felony second-degree burglary, and/or theft included in the pattern of criminal activity. In general, the criminal acts in this complaint involved KING SR. selecting burglary targets and relaying them to other members of the Enterprise; members of the Enterprise casing and/or otherwise obtaining information about the target businesses; members of the Enterprise gathering at KING SR.’s Arbor Street residence before and/or after burglaries; the use of one or more known vehicles associated with members of the Enterprise to travel to and/or from burglary locations; and the use of tools such as sledgehammers and pry bars to force entry into buildings and to access pull tab booths and safes. Suspects who conducted the break-ins were typically (though not always) wearing ski masks and gloves.

The Enterprise’s ties to individual burglaries were discovered by means including review of evidence and reports from investigations of individual burglaries by local law enforcement agencies, sometimes in coordination with one another and/or AGE; execution of search warrants (including for the Arbor Street residence, vehicles and electronics belonging to members of the Enterprise, and phone company, Facebook, and Google records for members of the Enterprise); review of footage from a law enforcement pole camera posted outside the Arbor Street residence and recording during part of May 2023 and again between August 10, 2023, and March 4, 2024; and interviews with members or associates of the Enterprise.

BURGLARY #1: WILD BOAR, HOPKINS (HENNEPIN COUNTY), 3/6/2023—KING SR. and JACKSON

On March 6, 2023, at approximately 2:56 A.M., Wild Boar in Hopkins, Hennepin County, was burglarized. Security camera footage showed two men with masks, each carrying a prying tool, breaking into the

building and leaving with a safe containing \$21,741 in cash, charitable gambling funds belonging to the Hopkins Raspberry Association organization. The suspects also took a pre-signed blank check written on the Hopkins Raspberry Festival Gaming Account checking account. They left the scene in a Chevrolet Impala matching one registered to JACKSON. Hopkins police investigated and identified the suspects as JACKSON and ROGER LEE TRICE (DOB 5/26/1978) (who is charged individually in a separate complaint with this burglary).

Further investigation indicated the Enterprise had a role in the burglary. TRICE admitted his and JACKSON's involvement and told officers that KING SR. would direct surveillance, hold planning meetings, and handle splitting the proceeds from burglaries. He said KING JR. often conducted surveillance. KING SR. told him specifically how far to go into the Wild Boar to find the cash safe and told him that he would have two minutes from the alarm going off until the police arrived. KING SR.'s cell phone, reviewed pursuant to search warrant, had a photo with a capture time stamp about four hours after the Wild Boar burglary that showed KING SR. holding a stack of cash. KING SR.'s Trustone bank records, reviewed pursuant to search warrant, also showed that he deposited \$2,000 in cash later that morning.

BURGLARY #2: COWBOY JACK'S, OTSEGO, 3/16/2023—KING SR. and PAANANEN-BERNECHE

On March 16, 2023, at approximately 3:15 A.M., Cowboy Jack's in Otsego was burglarized. A window was broken and a safe containing \$17,781 in cash (belonging to the Rogers Youth Hockey Association) was stolen. Security camera footage showed two men with a sledgehammer in the building, and a prybar was also found at the scene. The Wright County Sheriff's Office investigated and identified PAANANEN-BERNECHE (who has been charged with second-degree burglary arising from this incident in case 86-CR-24-860) as one of the two men. Google location data revealed that after the burglary, PAANANEN-BERNECHE went to KING SR.'s residence on Arbor Street in Saint Paul.

Further investigation indicated the Enterprise had a role in the burglary. A search warrant for KING SR.'s Google account showed that he had searched for directions to 9010 Quantrelle Ave in Otsego (the address of Cowboy Jack's) at 2:07 A.M., the morning of the burglary. Photos on KING SR.'s phone, timestamped approximately six hours after the burglary, showed him carrying a large amount of cash. Shortly thereafter, KING SR. deposited \$2,000 in cash in his Trustone bank account. A Toyota RAV4, consistent with one that investigators learned KING SR. had rented on March 14, 2023, was observed on security camera footage near Cowboy Jack's at the time of the burglary.

BURGLARY #3: AMERICAN LEGION, ST. LOUIS PARK (HENNEPIN COUNTY), 3/22/2023—KING SR. and ROSILLO

On March 22, 2023, at approximately 3:26 A.M., the American Legion in St. Louis Park, Hennepin County, was burglarized. Two glass doors were broken, apparently with a tool, and security camera footage showed the two men who broke in inside the bar area. Nothing was reported stolen. St. Louis Park police learned from witness accounts and security camera footage that a person matching ROSILLO's description had been seen in the bar at about 6:30 the previous evening, walking around aimlessly and acting suspiciously.

Further investigation indicated the Enterprise had a role in the burglary. The evening before the break-in, at about 6:00 P.M., KING SR. conducted Google searches for the American Legion in St. Louis Park, both by name and by address. Data from KING SR.'s electronic home monitoring (EHM) equipment established that he was in the area of the American Legion from about 6:35 P.M., to 6:45 P.M., contemporaneously with the time ROSILLO was observed inside the bar acting suspiciously.

BURGLARY #4: WILDCATS, EAGAN, 3/25/2023—KING SR., ROSILLO, and PAANANEN-BERNECHE

On March 25, 2023, at approximately 5:09 A.M., Wildcats in Eagan was burglarized. Security camera footage shows two men breaking in using a sledgehammer and rummaging inside the building. Nothing was reported stolen. Eagan police investigated and learned that individuals matching ROSILLO's and PAANANEN-BERNECHE's description had been seen in the establishment, appearing to case the pull tab area, earlier in the week.

Further investigation indicated the Enterprise had a role in the burglary. Minutes before the break-in, KING SR. conducted a Google search for directions to 1448 Yankee Doodle Road in Eagan (the address of Wildcats).

BURGLARY #5: BROADWAY BAR & PIZZA, ELK RIVER, 3/31/2023—KING SR. and PAANANEN-BERNECHE

On March 31, 2023, at approximately 2:34 A.M., Broadway Bar & Pizza in Elk River was burglarized. Security camera footage showed two men entering the business after breaking the glass out of a door, taking a safe (which contained \$13,807 in cash belonging to the Elk River Lions Club) from the pull tab area, and leaving. Elk River police investigated and noted that one of the men appeared to match PAANANEN-BERNECHE's description but closed the investigation without any suspects positively identified.

Further investigation indicated the Enterprise had a role in the burglary. Per KING SR.'s EHM data, he was in the parking lot outside Broadway Bar & Pizza on the afternoon of March 29, 2023. KING SR.'s phone contained photos timestamped 4:21 A.M., on March 31, 2023, depicting him with KING JR. and ROSILLO. KING SR. and KING JR. are holding wads of cash. Later that day, KING SR. deposited \$1,430 in his Trustone bank account.

BURGLARIES #6, 7: VFW, ROCHESTER; FULL TILT, BLOOMINGTON (HENNEPIN COUNTY), 4/4/2023—KING SR. and PAANANEN-BERNECHE

On April 4, 2023, at approximately 1:46 A.M., VFW Post #1215 in Rochester was burglarized. Security camera footage showed three suspects, who arrived in a white sedan, using a sledgehammer to break the front glass door and entering the building. Nothing was reported stolen. Rochester police investigated and learned that minutes after the burglary, PAANANEN-BERNECHE was pulled over for speeding on Highway 52 north of Rochester while driving a white Volkswagen Passat with two unidentified male passengers. The clothing on the vehicle's occupants matched the burglary suspects' clothing. PAANANEN-BERNECHE was charged with third-degree burglary and first-degree criminal damage to property in Olmsted County (55-CR-24-2138).

Also on April 4, 2023, at approximately 3:42 A.M., Full Tilt in Bloomington, Hennepin County, was burglarized. A large window had been smashed and a safe in the pull tab area had been opened, apparently by prying off the dial. Cash belonging to the Jefferson Athletic Foundation in the amount of \$18,367 was stolen. Security camera footage was of poor quality but appeared to show three men committing the burglary, just as in the burglary earlier that morning in Rochester. Bloomington police investigated but were unable to immediately identify any suspects.

Further investigation indicated the Enterprise had a role in both burglaries. Investigators learned the Passat was rented by KING SR. and had been observed at the Arbor Street house days earlier, on March 30, 2023. KING SR.'s EHM data indicates he was at the Rochester VFW on the afternoon of March 26, 2023. On the evening of April 3, 2023, KING SR. conducted a Google search for directions to the VFW.

On KING SR.'s phone, investigators found photos of KING SR. and PAANANEN-BERNECHE posing with cash. The photos had been taken about three hours after the Full Tilt burglary. KING SR.'s phone also contained pictures of a third male taken at around the same time; this third male appeared to be one of the unidentified passengers in the white Passat that PAANANEN-BERNECHE had been driving when he was pulled over north of Rochester earlier the same morning. PAANANEN-BERNECHE also posted a picture of cash on Facebook just before 5:00 A.M., with the caption, "Happy birthday to myself." April 4 is PAANANEN-BERNECHE's birthday.

At around noon on April 4, 2023, KING SR. deposited \$1,700 in his Trustone bank account. KING SR.'s EHM data indicates he had been in the area of Full Tilt on March 25, 26, and 28, 2023.

BURGLARY #8: AMERICAN LEGION, CHANHASSEN, 4/6/2023—KING SR.

On April 6, 2023, at approximately 3:20 A.M., the American Legion in Chanhassen was burglarized. The glass on the main door had been smashed and a door to the pull tab area was damaged. Nothing was reported stolen. Security camera footage showed four suspects in the building. The Carver County Sheriff's Office investigated and reviewed footage from the building and from nearby Minnesota Department of Transportation cameras showing that the suspects appeared to have arrived and left in a white sedan but were not able to immediately identify any suspects.

Further investigation indicated the Enterprise had a role in the burglary. The white sedan observed on camera appeared to be the same Passat in which PAANANEN-BERNECHE had been pulled over two days earlier. KING SR. had conducted a Google Maps search for directions to the 290 Lake Drive E in Chanhassen, the American Legion's address, on March 21, 2023. During a search warrant executed at the Arbor Street residence on May 9, 2023, investigators found a handwritten list of bars with addresses and closing times, including the Chanhassen American Legion. This list was written on a piece of mail addressed to KING SR.

BURGLARY #9: AMERICAN LEGION, MONTICELLO, 4/7/2023—KING SR. and JACKSON

On April 7, 2023, at approximately 3:49 A.M., the American Legion in Monticello was burglarized. The glass door was smashed with a green pry bar that was left at the scene, and the pull tab booth was accessed using a pickaxe and sledgehammer. Nothing was reported stolen. Security camera footage showed two suspects in the building. The Wright County Sheriff's Office investigated and took DNA swabs from the pry bar, which were tested and came back as an unconfirmed match to JACKSON's profile in a convicted offender database.

Further investigation indicated that the Enterprise had a role in the burglary. The address and closing time of the Monticello American Legion was on the handwritten list recovered at the Arbor Street residence. KING SR. had conducted a Google Maps search for directions to the American Legion at 304 Elm in Monticello on April 5, 2023.

BURGLARY #10: WILDCATS, EAGAN, 4/7/2023—KING SR.

On April 7, 2023, at approximately 5:20 A.M., Wildcats in Eagan was burglarized again. The front glass door was broken, and the pull tab booth was pulled to the side. Security camera footage showed two suspects who arrived in a white sedan consistent with the Passat in which PAANANEN-BERNECHE had been pulled over on April 4. One of the suspects smashed the door glass with a pickaxe-like tool and the other entered the business, then left it at around 5:24 A.M., At 5:42 A.M., the same suspects returned; once again entered the business, leaving about five minutes later. Nothing was reported stolen. Eagan police investigated but were not able to confirm the identity of either suspect.

Further investigation indicated that the Enterprise had a role in the burglary. As noted above, KING SR. had recently conducted a Google search for directions to the address of Wildcats, and the white Passat was rented by KING SR., observed at the Arbor Street residence, and driven by PAANANEN-BERNECHE. A search warrant for cell phone tower data also revealed that a tower near Wildcats had been used at about 5:30 A.M., on April 7 (between the first and second entries to Wildcats that morning) for a phone call between a phone number ending in 0414 and a phone number known to belong to KING SR. KING SR.'s phone included text messages with this number from later in April 2023 that appear to discuss prospective burglaries.

BURGLARY #11: SPORTS PAGE, BLOOMINGTON (HENNEPIN COUNTY), 4/8/2023—KING SR., PAANANEN-BERNECHE, and JACKSON

On April 8, 2023, at approximately 4:47 A.M., Sports Page in Bloomington, Hennepin County, was burglarized. Bloomington police dispatch observed on camera a suspicious gray sedan rolling around the parking lot of the business and saw what appeared to be flashlights inside the building. Bloomington police responded and found a large window at Sports Page broken out. A set of wooden sliding closet doors was also damaged. Nothing was reported stolen. Police later pulled over the gray sedan, which turned out to be JACKSON's Chevrolet Impala. JACKSON, PAANANEN-BERNECHE, and one other person were inside. Bloomington police reviewed security camera footage and saw that the one person who appeared to have run up to the building had been riding in a white sedan consistent with the Passat, rather than in JACKSON's Impala. Police obtained and executed a search warrant for the Impala and found, among other things, a pry bar, an axe and gloves. The Hennepin County Attorney's Office declined to file charges against PAANANEN-BERNECHE, JACKSON, and one other suspect (C.M.) related to this burglary.

Further investigation indicated that the Enterprise had a role in the burglary. JACKSON was later arrested (on May 9, 2023; BURGLARY #21, below) and interviewed. he admitted being at Sports Page on April 8, 2023, with PAANANEN-BERNECHE and C.M. He said he participates in burglaries because KING SR. pays him \$500 each time.

BURGLARY #12: AMERICAN LEGION, HOWARD LAKE, 4/13/2023—KING SR.

On April 13, 2023, at approximately 3:24 A.M., the American Legion in Howard Lake was burglarized. A window was broken and a safe containing \$11,853 in cash was taken from the pull tab booth. Security camera footage showed two suspects walking to the building after having parked a white sedan, consistent with the Passat, across the street. Footage shows one suspect using a sledgehammer on the safe. Howard Lake police and the Wright County Sheriff's Office investigated but were unable to positively identify the suspects.

Further investigation indicated that the Enterprise had a role in the burglary. The address and closing time of the Howard Lake American Legion was on the handwritten list recovered at the Arbor Street residence. KING SR. conducted a Google Maps search for directions to 616 7th Avenue in Howard Lake, the address of the American Legion, less than two hours before the burglary.

BURGLARY #13: AMERICAN LEGION, STILLWATER, 4/17/2023—KING SR., KING JR., and MASSIE

On April 17, 2023, at approximately 3:03 A.M., the American Legion in Stillwater was burglarized. The front door was pried open and the pull tab safe containing \$3,270 in cash was taken. Security camera footage from across the street shows a white sedan consistent with the Passat parking on the street in front of the American Legion, shortly after a black vehicle that appeared to be operating as a lookout drove past it. Two suspects exited the white sedan, and using a tool, forced open the door and entered the building. Less

than a minute later they exited the building carrying the safe and drove away, followed quickly by the black vehicle.

Stillwater police investigated and obtained Google location data indicating that MASSIE was in the black vehicle as well as cell phone location data indicating that KING JR. was one of the two suspects who entered the business. KING JR. and MASSIE were each convicted of second-degree burglary for this incident (82-CR-22-4691 and 82-CR-22-4690, respectively).

Further investigation indicated that the Enterprise had a role in this burglary. KING SR.'s phone included text messages to KING JR. reading "Dales coming" and "Get up" approximately two hours before the burglary, as well as text messages minutes after the burglary reading "Go to dales," "Dales," and "Asap." KING SR.'s EHM data showed that he was at the Stillwater American Legion's address on April 14, 2023, and that he was at MASSIE's residence in Saint Paul from about 3:24 A.M., until about 3:49 A.M., on April 17.

BURGLARY #14: BLAINBROOK BOWL, BLAINE, 4/21/2023—KING SR., KING JR., and FIKES

On April 21, 2023, at approximately 3:03 A.M., Blainbrook Bowl in Blaine was burglarized. A large side window was broken, an interior door forced open, and a pull tab safe damaged. Interior and exterior security camera footage showed three suspects entering the building using a sledgehammer. Two of the suspects came from a white sedan (consistent with the Passat) and one from a dark SUV that appeared to be a Chevrolet Tahoe. Nothing was reported stolen. Blaine police investigated but were unable to specifically identify the suspects on the scene.

Further investigation indicated that the Enterprise had a role in this burglary. KING SR. searched for directions to 12000 Central Avenue NE, the address of Blainbrook Bowl, at 2:07 A.M., the morning of April 21. A handwritten note of locations photographed during execution of the Arbor Street residence warrant included a partially obscured entry reading "NBROOK OWL" (with one of the words written above the other; the entire entry likely read "BLAINBROOK BOWL") and "27 minutes"; a Google Maps search for directions from the Arbor Street residence to Blainbrook Bowl indicates that it is a 27-minute drive. FIKES was arrested on August 27, 2023, driving a black Tahoe consistent with the one seen in security footage. KING SR. texted FIKES at 12:05 A.M., on April 21 with an address immediately across the street from the Arbor Street residence in Saint Paul, to which FIKES responded, "Yup." FIKES and KING JR.'s cell data records indicated they were in the area of Blainbrook Bowl at the time of the burglary. KING SR. made calls to both KING JR. and FIKES between 2:35 A.M., and 3:05 A.M., the morning of April 21.

BURGLARY #15: STOUT'S, FALCON HEIGHTS, 4/22/2023

On April 22, 2023, at approximately 2:39 A.M., Stout's in Falcon Heights was burglarized. A window was smashed and a safe containing \$7,888 in charitable gambling funds belonging to the Roseville Youth Hockey Association was stolen. Exterior security camera footage showed a white sedan consistent with the Passat parking outside the building; three suspects emerge from the car, one carrying a tool. The Ramsey County Sheriff's Office investigated but was unable to positively identify any suspects.

Further investigation indicated that the Enterprise had a role in the burglary. KING SR. searched for directions to Stout's on the afternoon of April 21, 2023. Phone records indicated KING SR. called FIKES at 2:36 A.M., on April 22. FIKES' phone data indicated he was in the area of Stout's at the time of the burglary. One of the suspects on the security camera footage was wearing a hooded sweatshirt with a Pittsburgh Penguins logo on it, consistent with one that was found during execution of the search warrant for JACKSON's Impala in connection with the Sports Page burglary in Bloomington.

BURGLARY #16: BIG LOUIE'S, NEW BRIGHTON, 4/25/2023—KING SR. and FIKES

On April 25, 2023, at approximately 3:23 A.M., Big Louie's in New Brighton was burglarized. A window was broken and drawers in the pull tab area forced open. Security camera footage showed a white sedan consistent with the Passat parking outside the business. Two suspects exit the vehicle and one smashes the window with a sledgehammer and enters the building. The sledgehammer was left behind. Nothing was reported stolen. New Brighton police investigated but could not identify a known suspect.

Further investigation indicated that the Enterprise had a role in the burglary. KING SR. searched for directions to Big Louie's on the morning of April 23. FIKES was in the area of the burglary at the time it occurred per cell phone data, and had calls to and from KING SR. leading up to and following the burglary.

BURGLARY #17: BOGART'S, APPLE VALLEY, 4/29/2023—KING SR. and KING JR.

On April 29, 2023, at approximately 1:42 A.M., Bogart's in Apple Valley was burglarized. The front double doors were damaged and a pull tab safe containing \$14,224 in charitable gambling funds belonging to the Eastview Hockey Association was taken. Security camera footage showed two suspects inside the building. Apple Valley police investigated but were unable to positively identify a suspect.

Further investigation indicated that the Enterprise had a role in the burglary. KING SR. and KING JR. exchanged text messages on the evening of April 28 in which KING SR. expresses impatience for KING JR. to be "ready." KING SR. searched for directions to 14917 Garrett Avenue (the address of Bogart's) approximately 23 minutes before the burglary. KING SR. called KING JR. at 1:41 A.M., KING JR.'s phone data indicates he was in the area of Bogart's at the time of the call. KING SR.'s phone contained photos of himself holding a large amount of cash taken at 4:37 A.M., 10:13 A.M., and 10:53 A.M., the day of the burglary.

BURGLARIES #18, 19: MAMA G'S, CORCORAN (HENNEPIN COUNTY); VFW, NORTH ST. PAUL, 5/3/2023—KING SR., KING JR., and JACKSON

On May 3, 2023, at approximately 3:30 A.M., Mama G's in Corcoran was burglarized. The front door glass was broken and the door to the pull tab booth was damaged. Nothing was reported stolen. Security camera footage showed a white sedan, consistent with the Passat, used by two suspects who went inside the building. One of the suspects was wearing a Champion sweatshirt. Corcoran police investigated but were unable to positively identify any suspects.

Also on May 3, 2023, at approximately 4:32 A.M., the VFW in North St. Paul was burglarized. The front door was pried open and a door to the pull tab area was damaged. Nothing was reported stolen. Security camera footage showed two suspects, one wearing a Champion sweatshirt, who arrived in a white sedan consistent with the Passat and used a pry bar and sledgehammer to force entry into the building and the pull tab door. North St. Paul police investigated but were unable to positively identify any suspects.

Further investigation indicated that the Enterprise had a role in both burglaries. KING SR. searched for directions to 9705 County Road 101 (the address of Mama G's) about an hour and fifteen minutes before it was burglarized. KING JR. texted KING SR. a photo of Mama G's, with a black truck parked in front of it, at 5:57 A.M., on May 2 (the day before the burglary). Immediately before sending the photo, KING JR. texted KING SR., "The owner just pulled in there..." KING SR. replied, "Fuck it tonight fasho." DVR footage from security cameras at the Arbor Street residence, obtained and reviewed pursuant to search warrant, showed KING JR. putting a sledgehammer and a crowbar-type tool into the white Passat and then driving away with JACKSON in the passenger seat approximately 1:24 A.M., The footage showed the Passat returning at about 5:23 A.M., and KING JR. and JACKSON getting out. JACKSON is wearing a Champion

sweatshirt in the Arbor Street security camera footage consistent with the one in the security camera footage from the businesses.

BURGLARY #20: THE CLOVER, ROSEMOUNT, 5/4/2023—KING SR., KING JR., JACKSON, and MASSIE

On May 4, 2023, at approximately 2:39 A.M., The Clover in Rosemount was burglarized. The front door appeared to have been pried open, the pull tab station door was open, and a safe containing \$24,083 in charitable gambling funds belonging to Irish Football Boosters had been stolen. Rosemount police investigated but were unable to positively identify a suspect.

Further investigation indicated that the Enterprise had a role in the burglary. Several agencies were conducting surveillance near the Arbor Street residence the night of May 3. Officers observed the Passat and MASSIE's blue Impala leaving the Arbor Street residence early in the morning on May 4. Video from a pole camera placed by law enforcement near the Arbor Street residence, and from the residence's security camera footage, showed that this occurred at approximately 2:02 A.M., KING SR. was in the Impala, and KING JR. and JACKSON were in the Passat; JACKSON had put a sledgehammer and pry bar-type tool in the trunk. Officers attempted to follow the vehicles when they left Arbor Street but lost them.

The Passat returned to Arbor Street at 4:31 A.M., with the driver identifiable on video as JACKSON, and the Impala returned at 4:52 A.M., with the driver identifiable as MASSIE and passengers identifiable as KING SR. and KING JR. KING SR. searched for directions to The Clover at 12:41 A.M., on May 4, about two hours before the burglary. KING JR.'s phone data indicated he was in the area of The Clover at the time of the burglary. At 3:30 A.M., KING SR. received a text asking what he was doing, and he replied, "Getting \$\$\$." Photos on KING SR.'s phone taken at 7:09 A.M., on May 4, shortly after the burglary, showed him holding a large amount of cash.

BURGLARY #21: AMERICAN LEGION, NORTH ST. PAUL, 5/9/2023—KING SR. and JACKSON

On May 9, 2023, at approximately 2:30 A.M., the American Legion in North St. Paul was burglarized. Several agencies conducting surveillance of the Arbor Street residence that night followed members of the Enterprise (including JACKSON and KING SR.) in two vehicles (a black Honda Odyssey and a black Infiniti sedan) to the American Legion in North St. Paul. There, law enforcement arrested JACKSON and another person who attempted to break into the American Legion using tools. Nothing was stolen. KING SR. left the American Legion in the Infiniti before the break-in began. He was arrested back at the Arbor Street residence.

Later in the morning on May 9, law enforcement from several agencies searched the Arbor Street residence pursuant to warrant and obtained evidence relevant to the burglaries committed as of and before that date.

JACKSON and the other person arrested breaking into the American Legion pleaded guilty to third-degree burglary relating to this incident (62-CR-23-2670, 62-CR-23-2663). KING SR. has a pending third-degree burglary charge for this incident (62-CR-23-2672).

BURGLARY #22: FARMINGTON LANES, FARMINGTON, 7/4/2023—KING SR. and MORRISON

On July 4, 2023, at approximately 1:46 A.M., Farmington Lanes in Farmington was burglarized. Security camera footage showed two suspects using a pry bar to force open a door, heading directly to the pull tab area (in a manner that suggested they knew where they were going), and leaving shortly thereafter. The footage showed that the suspects were traveling in a 2003 Lincoln sedan with Minnesota license plate

GTD180 and a burned-out right taillight. Nothing was reported stolen. Farmington police investigated but were unable to positively identify any suspects.

Further investigation indicated that the Enterprise had a role in the burglary. KING SR. searched for directions to Farmington Lanes on July 3, 2023. KING SR.'s phone contained a photo taken inside a car on July 3, 2023; the photo showed a gauge cluster consistent with that of a 2003 Lincoln with an illuminated warning light reading "CHECK RIGHT BRAKE LAMP." KING SR.'s phone also contained a casing video taken on June 23, 2023, which begins with KING SR. holding the phone inside MASSIE's Impala. KING SR. hands the phone to MORRISON, who keeps the phone recording as he walks into and around Farmington Lanes. Call detail records showed that MORRISON was in the area of Farmington Lanes at the time of the burglary.

BURGLARY #23: JOHNNY KITCHEN & BAR, MAPLEWOOD, 7/4/2023—KING SR., KING JR., and MORRISON

On July 4, 2023, Johnny Kitchen & Bar in Maplewood was burglarized. A glass door was shattered and the pull tab area disturbed. Nothing was reported stolen. Security camera footage was not made available to law enforcement. The burglary occurred between 11:00 P.M., on July 3 (when the business closed) and 10:00 A.M., on July 4 (when staff observed the broken door). Maplewood police investigated but were unable to positively identify any suspects.

Further investigation indicated that the Enterprise had a role in the burglary. Commercial license plate reader data indicated that the Lincoln (used in the Farmington Lanes burglary the same night) and MASSIE's Impala were traveling together on Highway 61 in Maplewood, near Johnny Kitchen & Bar, at approximately 12:15 A.M., on July 4. KING SR. searched for directions to Johnny Kitchen & Bar on June 21, 2023. Call detail records showed that MORRISON and KING JR. were in the area of Johnny Kitchen & Bar during the timeframe of the burglary on July 4.

BURGLARY #24: HUDY'S CAFÉ, CHAMPLIN, 7/10/2023—KING SR. and MORRISON

On July 10, 2023, at approximately 1:01 A.M., Hudy's Café in Champlin was burglarized. The door was forced open pull tab safe containing \$12,384 in charitable gambling funds belonging to the Champlin-Dayton Athletic Association was stolen. Security camera footage showed that four suspects arrived in a Lincoln consistent with the one used in the Farmington Lanes and Johnny Kitchen & Bar burglaries. Three of them entered the business, one carrying a sledgehammer, and took the safe. Champlin police investigated and discovered evidence that the Lincoln's registered owner, D.B., had connections to ROSILLO. D.B. told police he had sold the Lincoln to someone named "Andre" and provided a bill of sale indicating that it had been sold to "Andre Olson" on June 24, 2023. Police learned that this person did not exist. Champlin police ultimately found the Lincoln in the parking lot of a Cub Foods in Maplewood and impounded it but were unable to positively identify any suspects in the burglary.

Further investigation indicated that the Enterprise had a role in the burglary. KING SR. searched for directions to 11350 Aquila Drive N, Suite 100, the address of Hudy's, on July 8, 2023. Photos on KING SR.'s phone, taken at 5:08 P.M., on the date of the burglary and at 10:20 A.M., the following day, showed KING SR. with cash held in his teeth and spread on a bed behind him, respectively. KING SR. deposited \$1,410 in cash to his Trustone bank account the same day. MORRISON's call detail records showed that he was in the area of Hudy's at the time of the burglary.

BURGLARY #25: WILD BOAR, OAKDALE, 7/15/2023—KING SR., KING JR., and MORRISON

On July 15, 2023, at approximately 1:52 A.M., Wild Boar in Oakdale was burglarized. A door was pried

open and cabinet doors in the pull tab booth were broken. Nothing was reported stolen. Security camera footage showed two suspects breaking in, one carrying a tool. Oakdale police investigated but were unable to positively identify any suspects.

Further investigation indicated that the Enterprise had a role in the burglary. KING SR. searched for 950 Helena Avenue North, the address of the Oakdale Wild Boar, on July 11, 2023. KING SR.'s phone contained a photo of KING JR. taken the night of July 14 and showed that he had calls with KING JR. and MORRISON the night of July 14 into the early morning of July 15. KING JR.'s and MORRISON's call detail records showed that they were in the area of Wild Boar at the time of the burglary.

BURGLARY #26: CROOKED PINT, MAPLEWOOD, 7/17/23

On July 17, 2023, at approximately 1:38 A.M., Crooked Pint in Maplewood was burglarized. The front door and all of the drawers and cabinets in the pull tab booth were pried open. No security camera footage was available and nothing was reported stolen. Maplewood police investigated but were unable to positively identify any suspects.

Further investigation indicated that the Enterprise had a role in the burglary. KING SR.'s call detail records showed that he was in the area of Crooked Pint around the time of the burglary, and had a call with KING JR. around that time. Call detail records also showed that KING JR. and MORRISON were in the area of Crooked Pint around the time of the burglary.

BURGLARY #27: BUNGALOW INN, LAKELAND, 7/24/2023—KING SR.

On July 24, 2023, at approximately 2:50 A.M., Bungalow Inn in Lakeland was burglarized. The door was forced open and a safe containing \$17,707 in charitable gambling funds belonging to American Legion Post #491, Bayport, was stolen. Security camera footage showed a suspect who arrived in a light-colored sedan, possibly a silver Impala, using a mining axe-like tool using it to pop the deadbolt on the door and head to the pull tab booth. The Washington County Sheriff's Office investigated but was unable to positively identify any suspects.

Further investigation indicated that the Enterprise had a role in the burglary. KING SR. had Internet activity relating to the Bungalow Inn, including a search for directions, on the evening of July 23, 2023. Shortly after midnight on July 24, he had text messages with ROSILLO's daughter trying to locate ROSILLO, including one in which KING SR. says, "Tell your dad there's 20 plus +." At approximately 2:00 A.M., on July 24, KING SR. had text messages with another person in which he appears to be trying to get her to drive him somewhere, including ones in which he says "u don't understand its so much money" and "there's bands in here its clear let's get it." KING SR.'s phone contained a selfie-style picture taken at 4:39 A.M., in which KING SR. is holding a wad of cash to his ear as though it were a phone. KING SR. deposited \$2,380 in cash to his Trustone bank account later on the morning of July 24.

BURGLARY #28: WELSCH'S BIG TEN TAVERN, ARDEN HILLS, 7/27/2023—KING SR. and MORRISON

On July 27, 2023, at approximately 3:35 A.M., Welsch's Big Ten Tavern in Arden Hills was burglarized. A glass door was smashed and the pull tab safe damaged, apparently with a sledgehammer. Cleaners arrived at the property and scared off two suspects who fled out the broken door and drove off in a dark sedan. Nothing was reported stolen. Security camera footage showed one suspect with a white mask and another in a Champion sweatshirt (consistent with the one JACKSON had worn for the Mama G's and North St. Paul VFW burglaries). The Ramsey County Sheriff's Office investigated but was unable to positively identify any suspects.

Further investigation indicated that the Enterprise had a role in the burglary. KING SR.'s and MORRISON's

call detail records indicated they were in the area at the time of the burglary and exchanged calls. KING SR.'s phone contained selfie-style pictures of a person appearing to be KING SR. wearing a white mask, consistent with the one worn by one of the suspects in security camera footage, taken on the same day as the burglary.

BURGLARY #29: McCARRON'S PUB & GRILL, MAPLEWOOD, 8/6/2023—KING SR., FIKES, and MORRISON

On August 6, 2023, at approximately 5:00 A.M., McCarron's Pub & Grill in Maplewood was burglarized. A window was smashed and the pull tab booth damaged. Security camera footage showed two suspects arriving in a dark vehicle that appeared to be a black Chevrolet Tahoe or GMC Denali. The suspects attempted to break in through the door, were unsuccessful, and used a sledgehammer to break in through the window. Nothing was reported stolen. Maplewood police investigated but were unable to positively identify any suspects.

Further investigation indicated that the Enterprise had a role in the burglary. The black vehicle used for the burglary is consistent with one belonging to FIKES, including a missing front passenger side hubcap on both vehicles. KING SR.'s, FIKES', and MORRISON's call detail records indicated they were in the area at the time of the burglary. KING SR. texted FIKES at 4:00 A.M., "Come 2 cub the last 2 people r in the lot it's clearing." (There is a Cub Foods immediately north of McCarron's.) There were calls between KING SR. and FIKES, KING SR. and MORRISON, and FIKES and MORRISON around the time of the burglary.

BURGLARY #30: DUNHAM'S, WEST ST. PAUL, 8/7/2023—KING SR., FIKES, and MASSIE

On August 7, 2023, at approximately 5:55 A.M., Dunham's in West St. Paul was burglarized. The exterior door for the smoking area was pried open and the pull tab booth damaged. Security camera footage two suspects getting out of a dark SUV (consistent with FIKES' Tahoe, including the missing hubcap) and entering the bar. Nothing was reported stolen. West St. Paul police investigated but were unable to positively identify any suspects.

Further investigation indicated that the Enterprise had a role in the burglary. KING SR. had Internet activity relating to Dunham's on August 6, 2023. FIKES' and MASSIE's call detail records indicated that they were in the area at the time of the burglary. There were calls between KING SR. and FIKES and between MASSIE and MORRISON around the time of the burglary. Text messages between FIKES and KING SR. on the night of August 6 and early morning of August 7 appear to be setting up a meeting.

BURGLARY #31: VFW, FOREST LAKE, 8/13/2023—KING SR., FIKES, MASSIE, and MORRISON

On August 13, 2023, at approximately 4:10 A.M., the VFW in Forest Lake was burglarized. The front glass door was smashed and a safe containing \$25,513 belonging to VFW Post 4210 Forest Lake was stolen. Security camera footage showed two masked suspects entering the building with a sledgehammer and taking the safe away. Forest Lake police investigated and spoke with a witness who had seen a masked man in a black SUV near the VFW shortly before the burglary. Police referred one person, D.S., for charges, which the Washington County Attorney's Office declined to file.

Further investigation indicated that the Enterprise had a role in the burglary. Pole camera video at the Arbor Street residence showed FIKES' black Tahoe leaving with passengers inside at about 1:15 A.M., the morning of the burglary. FIKES', MASSIE's, and MORRISON's call detail records indicated that they were in the area at the time of the burglary. KING SR.'s phone contained a video he recorded of himself approximately three hours after the burglary, with cash spread on a bed behind him. In the video, KING SR. says, "Early bird get the first worm." FIKES played \$1,940 at Running Aces Casino the day after the

burglary.

BURGLARY #32: COUNTRY LOUNGE, GEM LAKE, 8/18/2023—KING SR., ROSILLO, and MORRISON

On August 18, 2023, at approximately 2:35 A.M., Country Lounge in Gem Lake was burglarized. A window was smashed and the pull tab safe damaged. Security camera footage showed two suspects using a sledgehammer to get into the building and to repeatedly hit the safe. Security camera footage showed two suspect vehicles, a dark sedan and a dark SUV. Nothing was reported stolen. White Bear Lake police investigated and ultimately referred ROSILLO for charging based on evidence including that his electronic home monitor data placed him at the scene; ROSILLO pleaded guilty to second-degree burglary for this matter in case 62-CR-23-7544.

Further investigation indicated that the Enterprise had a role in the burglary. Pole camera video from the Arbor Street residence showed vehicles consistent with KING SR.'s BMW sedan and FIKES' Tahoe leaving at approximately 2:19 A.M., about fifteen minutes before the burglary, and returning at 3:06 A.M., and 3:10 A.M., ROSILLO's EHM data also showed him leaving Arbor Street at around 2:19 A.M., at the Country Lounge at around 2:37 A.M., and back at Arbor Street at around 3:07. ROSILLO's phone contained a video that appeared to be taken by him inside the Country Lounge showing the location of the pull tab safe and asking a person at the pull tab booth what time they close. KING SR. had calls around the time of the burglary with FIKES, MASSIE, MORRISON, and ROSILLO. MORRISON's call detail records indicated he was in the area at the time of the burglary.

BURGLARY #33: KELLER GOLF COURSE, MAPLEWOOD, 8/19/2023—KING SR., FIKES, MASSIE, MORRISON, and ROSILLO

On August 19, 2023, at approximately 1:43 A.M., Keller Golf Course in Maplewood was burglarized. A glass door to the clubhouse was smashed and an ATM moved to the middle of a room inside. Security camera footage showed two suspects walking toward the building in the parking lot. Nothing was reported stolen. Maplewood police investigated but were unable to positively identify any suspects.

Further investigation indicated that the Enterprise had a role in the burglary. Pole camera video from the Arbor Street residence showed vehicles consistent with KING SR.'s BMW and FIKES' Tahoe leaving at approximately 1:13 A.M., and returning at approximately 2:01 and 2:07 A.M., Both KING SR.'s and ROSILLO's phones contained videos that appeared to show ROSILLO casing the business. ROSILLO's phone contained an additional video appearing to show him pushing on an ATM inside the Keller Golf Course building, as if to see if it was secured to the floor or wall. ROSILLO's EHM data indicated he was in the area of Keller Golf Course for almost an hour on the afternoon of August 17, 2023. KING SR. had calls and texts with MASSIE, MORRISON, FIKES, and ROSILLO the night before and/or morning of the burglary, including one text in which he instructs MORRISON to "Call Cory." KING SR.'s, MASSIE's, MORRISON's, and FIKES' call detail records indicated they were in the area at the time of the burglary. ROSILLO was not in the area, according to his EHM data.

BURGLARY #34: FARIBAULT COUNTRY CLUB, FARIBAULT, 8/20/2023—KING SR., MORRISON, and ROSILLO

On August 20, 2023, at approximately 1:09 A.M., Faribault Country Club in Faribault was burglarized. A window was broken using a tool and approximately \$2,000 in cash stolen. Security camera footage showed three suspects, who used tools to enter the building and what appeared to be a strong magnet to bypass the electronic safe. Cables outside had been cut. Faribault police investigated and ultimately referred ROSILLO for charging based on evidence including that his electronic home monitor data placed him at the scene; ROSILLO pleaded guilty to second-degree burglary for this matter in case 66-CR-23-

Further investigation indicated that the Enterprise had a role in the burglary. Pole camera video from the Arbor Street residence showed vehicles consistent with KING SR.'s BMW and FIKES' Tahoe leaving at about 12:11 A.M., on August 20 and returning at about 2:00 A.M., KING SR.'s phone included an outgoing text sent at 8:26 P.M., on August 19, hours before the burglary, in which he said, "I'm gonna be in Faribault for a few hours tonight." ROSILLO's EHM data and MORRISON's call record data indicated they were in the area at the time of the burglary, and ROSILLO's EHM data is consistent with having traveled from Arbor Street to Faribault in the BMW or Tahoe observed on pole camera video. KING SR.'s phone had calls and text messages with FIKES, MORRISON, and MASSIE in the hours leading up to the burglary. It also had two photos taken at 11:56 P.M., on August 19, 2023, showing MASSIE, MORRISON, ROSILLO, and unidentified individuals, including one holding a sledgehammer. FIKES' phone had calls and texts with KING SR before and after midnight on August 19 and 20 seeming to indicate he was on his way to Arbor Street.

BURGLARIES #35, 36: KELLY'S KORNER, CENTERVILLE; SPRING STREET TAVERN, MINNEAPOLIS (HENNEPIN COUNTY), 8/25/2023—KING SR. and FIKES

On August 25, 2023, at approximately 2:41 A.M., Kelly's Korner in Centerville was burglarized. The door glass was smashed and the pull tab safe damaged. Security camera footage showed two men arriving in what appeared to be a dark SUV and breaking into the building. Centennial Lakes and Anoka County law enforcement investigated and took samples of blood that appeared to be from one of the suspects cutting himself on the door glass but were unable to positively identify any suspects.

Also on August 25, 2023, at approximately 4:23 A.M., Spring Street Tavern in Minneapolis was burglarized. The door glass was shattered and the pull tab booth ransacked. Security camera footage showed two suspects attempting to break in using sledgehammers at 4:06 A.M., then returning at 4:23 A.M., and breaking in through the door glass. Nothing was reported stolen. Minneapolis police investigated but were unable to positively identify any suspects.

Further investigation indicated that the Enterprise had a role in both burglaries. Pole camera video from the Arbor Street residence showed a vehicle consistent with KING SR.'s BMW leaving at 1:23 A.M., and returning at 3:02 A.M., then leaving again at 3:29 A.M., and returning at 5:13. It also shows a vehicle consistent with FIKES' Tahoe arriving at 3:28 A.M. and leaving a minute later. KING SR. had Internet activity relating to Spring Street Tavern on August 23, 2023, and searched for directions to Centerville about half an hour before the Kelly's Korner burglary. Investigators searched the phone of a juvenile who was arrested leaving the scene of a burglary on August 27 and found text messages with KING SR. from the evening of August 24, in which KING SR. indicates he won't be "making moves" until after 12:30 A.M., and asks if the juvenile has a "shistie mask." KING SR.'s and FIKES' call detail records indicated that they were in the area of each burglary at the time it occurred.

BURGLARY #37, 38, 39: BROADWAY BAR & PIZZA, PLYMOUTH (HENNEPIN COUNTY); GALLAGHER'S BAR, WEST ST. PAUL; CHERRY PIT, SAINT PAUL, 8/27/2023—KING SR. and FIKES

During the evening of August 26, 2023, and morning of August 27, 2023, investigators were in the area of the Arbor Street residence conducting surveillance. Investigators observed FIKES' Tahoe and KING SR.'s BMW leave the area at approximately 1:02 A.M., on August 27, but lost sight of the vehicles due to their erratic driving and unsafe speeds.

On August 27, 2023, at approximately 2:04 A.M., Broadway Bar & Pizza in Plymouth was burglarized. The front door glass was smashed and an electronic pull tab machine damaged. Security camera footage

showed three suspects entering the building and hitting the pull tab machine with a sledgehammer. Cables outside had been cut. Nothing was reported stolen. A Plymouth police officer noticed FIKES' Tahoe leaving the area at approximately 2:20 A.M.,

Also on August 27, 2023, between 2:00 A.M., and 4:00 A.M., Gallagher's Bar in West St. Paul was burglarized. A window was smashed and the pull tab area ransacked. Cables outside had been cut. Security camera footage was of poor quality but showed one suspect inside the building. Nothing was reported stolen.

Also on August 27, 2023, at approximately 4:42 A.M., Cherry Pit in Saint Paul was burglarized. A glass door was smashed and the pull tab area disturbed. Security camera footage showed two suspects inside the building after using a sledgehammer to shatter the door. Footage showed one of the suspects leaving a sledgehammer on top of a cabinet, where officers later found it. Nothing was reported stolen. Investigators located FIKES' Tahoe leaving the area of the burglary and arrested FIKES and three passengers.

Investigation the night of the burglaries and thereafter indicates the Enterprise had a role in these burglaries. KING SR.'s phone included two videos taken inside the Cherry Pit on August 3, 2023, showing the pull tab area. Call detail records indicate that KING SR. and FIKES were each in the area of all three burglaries. KING SR. had Internet activity for Broadway Pizza in Plymouth on August 26 and for Gallagher's at about 3:30 A.M., on August 27. KING SR. also texted FIKES photos of the Cherry Pit at 3:23 A.M., on August 27. FIKES' phone indicated he had search for directions from the Arbor Street residence to the Cherry Pit at about 4:25 A.M., on August 27. Pole camera video and law enforcement observations at the Arbor Street residence showed KING SR.'s BMW and FIKES' Tahoe coming and going at times consistent with their presence at all three burglaries.

The three suspects arrested with FIKES were charged in Ramsey County.

BURGLARY #40: MONIE'S BAR, MAPLE PLAIN (HENNEPIN COUNTY), 9/8/2023—KING SR. and MORRISON

On September 8, 2023, at approximately 5:47 A.M., Monie's Bar in Maple Plain was burglarized. The glass door was shattered and a cabinet damaged. A phone line outside was cut. Security camera footage showed two men using a sledgehammer to break into the building. Nothing was reported stolen. West Hennepin police investigated but were unable to positively identify any suspects.

Further investigation indicated that the Enterprise had a role in the burglary. KING SR. had Internet activity relating to Monie's on the evening of September 7. KING SR.'s and MORRISON's call detail records indicated they were in the area at the time. MORRISON sent text messages to KING SR. leading up to the burglary, including one at 12:42 A.M., saying, "call me when you're ready to go." Pole camera video from the Arbor Street residence shows KING SR.'s BMW leaving at 4:15 A.M., on September 8 and returning at 6:38 A.M., three individuals then got out of the car, one of whom appeared to be MORRISON.

BURGLARY #41: HAWKS SPORTS BAR & GRILL, MONTICELLO, 9/10/2023—KING SR. and MORRISON

On September 10, 2023, at approximately 2:00 A.M., Hawks Sports Bar & Grill in Monticello was burglarized. The front door was pried open and \$10,095 in charitable gambling funds belonging to the Monticello Youth Hockey Program was taken from the pull tab safe. Phone and internet cables were cut. Security camera footage showed three suspects arriving in a vehicle consistent with KING SR.'s BMW. Two of them entered the building after forcing the door using a pry bar and accessed the safe.

The Wright County Sheriff's Office investigated and developed evidence that KING SR. was among the burglars. His Facebook page contained a picture of him on May 5, 2023, wearing a camouflage-patterned mask consistent with one worn by a suspect during the burglary. Additional evidence that the Enterprise had a role in the burglary included that KING SR. had Internet activity relating to Hawks on September 7 and shortly after midnight on September 10, 2023; that MORRISON's call detail records indicated he was in the area of the burglary at the time; that pole camera video from the Arbor Street residence showed the BMW leaving before the burglary and arriving after it; and that KING SR.'s phone contained a photo of himself, taken at 3:19 A.M., the morning of the burglary, holding a large stack of cash next to his ear.

BURGLARY #42: WILLY McCOY'S, BLOOMINGTON (HENNEPIN COUNTY), 1/29/2024—KING SR. and MORRISON

On January 29, 2024, at approximately 1:38 A.M., Willy McCoy's in Bloomington was burglarized. A glass door was smashed and the pull tab safe damaged. Security camera footage showed two suspects using a sledgehammer to break the door and entering the building, where they unsuccessfully tried to remove the safe. Nothing was reported stolen. Bloomington police were unable to positively identify any suspects on initial investigation and alerted AGE of another burglary fitting the pattern of the Enterprise.

Further investigation indicated that the Enterprise had a role in the burglary. MORRISON's call detail records indicated he was in the area at the time. KING SR. had text messages with a person who lived with ROSILLO, close by Willy McCoy's, including one shortly before the burglary in which KING SR. says, "Let us know when it's clear." KING SR. also had phone contact with MORRISON leading up to the burglary. The Arbor Street pole camera had intermittent outages but showed KING SR.'s BMW arriving at approximately 2:05 A.M.,

BURGLARY #43: AMERICAN LEGION, APPLE VALLEY, 2/15/2024—KING SR., PAANANEN-BERNECHE, and MORRISON

On February 15, 2024, at approximately 12:44 A.M., there was an attempted burglary at the American Legion in Apple Valley. Security camera footage showed two suspects trying unsuccessfully to break through the glass door with a sledgehammer, without causing obvious damage, then leaving. Investigation indicated the Enterprise had a role in this attempted burglary. A tracker had been placed on KING SR.'s BMW pursuant to search warrant and showed that it was in the area of the burglary at the time. Investigators conducting surveillance observed the BMW traveling in tandem with a black Jeep registered to ROSILLO's daughter. The suspects on video attempting to break into the American Legion wore clothing consistent with clothing worn by PAANANEN-BERNECHE and MORRISON when they were arrested a week later. PAANANEN-BERNECHE's and MORRISON's call detail records indicated they were in the area of the burglary at the time. Pole camera video at the Arbor Street residence showed KING SR.'s BMW and ROSILLO's daughter's Jeep leaving at 11:02 P.M., on February 14 and returning at 1:29 A.M., and 2:28 A.M., respectively, on February 15.

BURGLARY #44: JJ'S CLUBHOUSE, GOLDEN VALLEY (HENNEPIN COUNTY), 2/22/2024

On February 22, 2024, at approximately 1:58 A.M., JJ's Clubhouse in Golden Valley was burglarized. A glass door was smashed and the pull tab area disturbed. Law enforcement was tracking KING SR.'s BMW and ROSILLO's daughter's Jeep, which were observed to be in the area of the burglary. Tracker data on the BMW indicated it was also used to case the area of the business ahead of time.

KING SR., ROSILLO, PAANANEN-BERNECHE, and MORRISON were each arrested in connection with this burglary. ROSILLO (27-CR-24-4338), PAANANEN-BERNECHE (27-CR-24-4343), and MORRISON (27-CR-24-4339) each pleaded guilty to second-degree burglary in connection with this incident. KING SR.

(27-CR-24-4337) had charges dismissed as part of a global resolution with a case in Washington County.

WARRANT REQUESTS

PAANANEN-BERNECHE and ROSILLO are currently incarcerated in Minnesota Department of Corrections custody and the State is requesting warrants to secure their appearance.

KING SR. was released from prison in January 2025. Since then, more burglaries consistent with those involving the Enterprise have occurred, including another burglary of JJ's Clubhouse in Golden Valley. KING SR., KING JR., and other associates were arrested leaving a burglary in Blaine on April 11, 2025. Because of the evidence that the Enterprise's activities are continuing, the State is requesting warrants for KING SR., KING JR., MORRISON, FIKES, MASSIE, and JACKSON.

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

Michael Miller
Special Agent
445 Minnesota Street
Suite 1600
St Paul, MN 55101
Badge: 778

Electronically Signed:
04/18/2025 03:47 PM
Hennepin County, Minnesota

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

Prosecuting Attorney

Zachary Brennan DesAutels
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
04/18/2025 03:42 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).

☐ 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: \$100,000.00

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: _____, _____.

Judicial Officer

<judge name>

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

COUNTY OF HENNEPIN
STATE OF MINNESOTA

State of Minnesota

Plaintiff

vs.

DALE ANTHONY MASSIE Jr

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: DALE ANTHONY MASSIE Jr
DOB: 10/18/1974
Address: 1788 Case Ave E
St Paul, MN 55119

Alias Names/DOB:
SID:
Height:
Weight:
Eye Color:
Hair Color:
Gender: MALE
Race: Black
Fingerprints Required per Statute: Yes
Fingerprint match to Criminal History Record: No
Driver's License #:
SILS Person ID #: 354387
SILS Tracking No. 3422953
Case Scheduling Information: Complex Crime case, please schedule on Felony A
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	3/6/2023	609.903.1(1) Racketeering-Enterprise-Employed/Ass oc/Participate	Felony	X1300		MNGED0000	20230377
	Penalty	3/6/2023	609.904.1 Racketeering-Penalty	Felony	X1300		MNGED0000	20230377