

<b>State of Minnesota</b>	<b>County of Ramsey</b>	<b>District Court</b>
<b>Complaint</b>		

AMENDED COMPLAINT  
 TAB CHARGE PREVIOUSLY FILED

<b>DATE FILED</b>	<b>PROSECUTOR FILE NO.</b>	<b>Court File No.</b>
	CR-2017-351	

02-CR-17-1589

**STATE OF MINNESOTA,**

**PLAINTIFF,**

Order of Detention

**VS.**

NAME: First, Middle, Last Diamond Laray Reynolds 976 Robert Street S, #302 West St. Paul, MN 55118	DEFENDANT
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Date of Birth
07/14/1989

Ct	Statute Type	Offense Date	Statute Number & Description	Offense Level	MOC	GOC	Controlling Agencies	Control Numbers
1	Chrg/Penalty	2/28/17	609.222 Subd. 1; 609.11, subd. 4 Dangerous Weapon – Non-Firearm Assault-2nd Degree-Dangerous Weapon	F	A2342	N	MN0620900	17043498
2	Chrg/Penalty	2/28/17	609.223 Subd. 1 Assault-3rd Degree- Substantial Bodily Harm		A3242	N	MN0620900	17043498

**Complaint**

The Complainant being duly sworn states that the following facts establish PROBABLE CAUSE:

Your complainant is a licensed peace officer in the State of Minnesota, and is employed by the Washington County Sheriff's Office. In that capacity and upon review of the reports and attachments, your complainant states the following, involving DIAMOND LARAY REYNOLDS, DOB: 7-14-1989, DYAMOND CASYANA RICHARDSON, DOB: 6-21-1991, and CHNIKA CHATEISE BLAIR, DOB: 9-6-1998, to establish probable cause:

On February 28, 2017 at 10:30 a.m., Officers were called to the area of 1554 Jessamine Lane, St. Paul, Ramsey County on the report of an assault in progress. Dispatch reported that a group of females had "jumped" another female and struck her in the head with a hammer. While en route, officers learned the suspects had left in a white truck and a silver car. The victim had been transported to Regions Hospital.

Officers located the victim, (VICTIM DOB: 5-18-1992), at Regions Hospital. The victim had blood on her face that appeared to be coming from her forehead and blood on her shirt. The victim reported the following: Earlier that morning she was traveling east on Magnolia Avenue E. from Johnson Pkwy. As she approached the stop sign at Barclay Street she noticed a white SUV make a u-turn and follow her. She pulled into the parking lot on Jessamine Lane and exited her vehicle. As she did, she heard someone "holler" at her. The victim looked up and saw

DIAMOND LARAY REYNOLDS, DOB: 7-14-1989, (herein Defendant Reynolds) and another female (later identified as CHNIKA CHATEISE BLAIR, DOB: 9-6-1998, herein Defendant Blair), coming at her. Defendant Reynolds ran up to her and punched her in the head with a closed fist. Defendant Blair then grabbed the victim's hair. At one point during the struggle, Defendant Reynolds struck the victim in the head with a hammer knocking her to the ground. Once on the ground, Defendant Reynolds continued to strike her in the head with the hammer. The victim blacked out for a moment, but when she looked up she saw Defendant Reynolds holding a silver hammer. Defendant Reynolds then took the hammer and struck the victim's windshield on her vehicle in an attempt to smash the window. As the victim attempted to get off the ground, another vehicle, pulled up and a third female the victim knew as DYAMOND CASYANA RICHARDSON, DOB: 6-21-1991, (herein Defendant Richardson), got out of the car chased her down spraying bear mace at the victim. The females then left in two vehicles occupied by 7 or 8 people total and fled the scene.

The victim was presented with three different photo line ups and positively identified Defendants Reynolds, Richardson, and Blair as the three females that attacked her.

An eye witness, B.K., was located and interviewed. B.K. stated that he was visiting the area and had just woken up when he heard some yelling and screaming coming from behind the building. He went out the front door and saw the victim bleeding from her head walking from the parking lot towards him. As she approached him, he saw another female chasing after her spraying bear mace towards the victim. The females then hopped into a silver vehicle and fled. One of the females yelled that she had just broken a window. Officers later confirmed that victim's vehicle windshield was broken as a result of Defendant Reynolds smashing the glass with the hammer. The victim told B.K. she had been hit with a hammer and appeared dazed.

Defendant Richardson was interviewed under Miranda and provided the following information: That there was a continuing conflict between her and the victim's friend, Y.G.. On February 9<sup>th</sup> Y.G. and the victim had showed up at her place of employment and started a fight with Defendant Richardson. She added that Defendant Reynolds claimed that Y.G. had damaged her vehicle and that Y.G. was wanting to fight. Defendants Reynolds and Blair agreed to help Richardson find and fight Y.G. The three defendants then rode in two different cars to the victim's house in search of Y.G. When Defendant Richardson arrived, Reynolds and Blair were already there and the victim was getting up off the ground and was all "jacked up," as she was bleeding from the face and her hair was matted. Defendant Richardson then got out of the car and tried to mace the victim with a can of bear mace.

The victim provided officers with a Facebook post from Defendant Reynolds that was posted the same day as the incident at Defendant Richardson's place of employment wherein she specifically threatens to come after the victim.

The foregoing facts constitute your Complainant's basis for believing that on or about February 28, 2017 in Ramsey County, State of Minnesota, the defendant, **Diamond Laray Reynolds**, (DOB: 07/14/1989), did wrongfully, unlawfully,

**Count 1**

**Charge: Dangerous Weapon – Non-Firearm Assault-2nd Degree-Dangerous Weapon**  
**In Violation of: 609.222 Subd. 1; 609.11, subd. 4**  
**Penalty: 7 years and \$14,000**

assault another, to-wit: J.D., with a dangerous weapon, to wit: hammer

Count 2

**Charge:** Assault-3rd Degree-Substantial Bodily Harm  
**In Violation of:** 609.223 Subd. 1  
**Penalty:** 5 years and \$10,000

assault another, to wit: J.D., and inflict substantial bodily harm

*THEREFORE, Complainant requests that said Defendant, subject to bail or conditioned 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'S NAME:**

**COMPLAINANT'S SIGNATURE**

BRIAN R MUELLER



Being duly authorized to prosecute the offense(s) charged, I hereby approve this Complaint

**DATE:**

03/03/2017

**PROSECUTING ATTORNEY'S SIGNATURE**



**PROSECUTING ATTORNEY:  
NAME/TITLE**

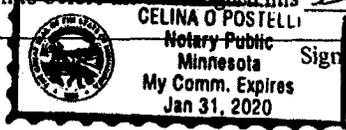
Siv Yurichuk  
Special Assistant Ramsey County Attorney  
Attorney Registration #: 034798X

**ADDRESS/TELEPHONE**

**PROSECUTING ATTORNEY'S SIGNATURE**  
Washington County Government Center, 15015 62nd Street  
North Stillwater, MN 55082  
(651)430-6115

Court Case #:

This COMPLAINT was subscribed and sworn to before the undersigned this 3rd day of March



NAME: Celina Postali  
Title: Legal Assistant

Signature: Celina Postali

**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. The Defendant(s) is/are thereof charged with the above stated offense(s)

**SUMMONS**

THEREFORE, You, THE ABOVE-NAMED DEFENDANT(S), ARE HEREBY SUMMONED to appear on the day of \_\_\_\_\_ at \_\_\_\_\_ AM/PM before the above-named court at \_\_\_\_\_ to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

**WARRANT**

EXECUTE IN MINNESOTA ONLY     EXECUTE NATIONWIDE     EXECUTE IN BORDER STATES  
 To the sheriff of the above-named county; or other person authorized to execute this WARRANT; I hereby order, in the name of the State of Minnesota, that the above-named Defendant(s) be apprehended and arrested without delay and brought promptly before the above-named 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 thereafter as such Judge or Judicial Officer is available) to be dealt with according to law.

**ORDER OF DETENTION**

Since the above-named Defendant(s) is/are already in custody; I hereby order; subject to bail or conditions of release, that the above-named Defendant(s) continue to be detained pending further proceedings.

Bail: 90,000  
Conditions of Release:

This Complaint is duly subscribed and sworn to, is issued by the undersigned Judicial Officer this 3rd day of March, 2017

NAME: Laura E. Nelson  
TITLE: Judge of District Court

Signature: [Signature]

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

STATE OF MINNESOTA, COUNTY OF RAMSEY  
  
STATE OF MINNESOTA  
Plaintiff  
vs  
Diamond Laray Reynolds  
Defendant(s)

Clerk's Signature or File Stamp:

**RETURN OF SERVICE**

I hereby Certify and Return that I have served a copy of this COMPLAINT upon the Defendant(s) herein-named.

Signature of Authorized Agent: