Filed in District Court
State of Minnesota
4/16/2026

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 26A01457
Court File No. 27-CR-26-9656

**State of Minnesota,**

Plaintiff,

vs.

**GREGORY DONNELL MORGAN JR DOB: 02/22/1991**

2334 JAMESON ST
TEMPLE HILLS, MD 20748

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: Assault-2nd Degree-Dangerous Weapon**
Minnesota Statute: 609.222.1, with reference to: 609.222.1, 609.11.5(a)
Maximum Sentence: 7 YEARS AND/OR $4,200-$14,000
Offense Level: Felony

Offense Date (on or about): 02/05/2026

Control #(ICR#): 26401115

Charge Description: That on or about 2/5/2026, in Hennepin County, Minnesota, GREGORY DONNELL MORGAN Jr, assaulted Victim 1, while using a firearm.

**COUNT II**

**Charge: Assault-2nd Degree-Dangerous Weapon**
Minnesota Statute: 609.222.1, with reference to: 609.222.1, 609.11.5(a)
Maximum Sentence: 7 YEARS AND/OR $4,200-$14,000
Offense Level: Felony

Offense Date (on or about): 02/05/2026

Control #(ICR#): 26401115

Charge Description: That on or about 2/5/2026, in Hennepin County, Minnesota, GREGORY DONNELL MORGAN Jr, assaulted Victim 2, while using a firearm.

Filed in District Court
State of Minnesota
4/16/2026

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

On Thursday, February 5, 2026, at 4:22:50 PM, the Minnesota State Patrol received a report that the driver of a Ford Expedition had just pointed a gun at the occupants of another vehicle, identified as Victim 1 and Victim 2, on eastbound Minnesota State Highway 62 (Hwy 62) at the interchange with Interstate Highway 35W (I-35W), located in Hennepin County, Minnesota. Troopers investigated the incident; spoke to both victims; and identified the gunman as GREGORY DONNELL MORGAN, JR (DOB: 02/22/1991) ("Defendant" herein). At the time of the incident, Defendant was employed as a federal agent with Immigration and Customs Enforcement ("ICE") Enforcement Removal Operations ("ERO") and was detailed to the Minneapolis area.

Location of the Incident

Based on statements from Victim 1 and Victim 2, and a review of traffic camera video, Troopers determined that the incident occurred at the interchange of Hwy 62 and I-35W. Troopers are aware that at that interchange, eastbound Hwy 62 reduces from two lanes to one lane for a brief distance until traffic from southbound I-35W merges onto Hwy 62 and adds a second lane. Because of the large volume of vehicles that move through this interchange, especially during rush hour times, coupled with the reduction down to one lane, vehicles often must queue and reduce speed as they proceed, resulting in slower-moving, congested commuter traffic.

In the eastbound direction, the right shoulder is clearly marked as not a legal lane of traffic. The right lane of traffic exits Hwy 62 onto local streets. There are many signs leading up to that point that indicate the right lane must exit and that traffic continuing on eastbound Hwy 62 must be in the left lane. Solid white lines immediately following the exit indicate that the shoulder is not legal for driving.

Investigators are aware that occasionally at this interchange a driver will flout the need to merge into one-lane traffic, drive illegally on the right shoulder, pass slower-moving traffic, and then merge later, saving a few seconds on a commute while irritating other drivers on the roadway.

Statements of Victims

At the time of the incident, Victim 1 was driving east on Hwy 62 through the above-described I-35W interchange. Victim 2 was in the front-passenger seat. Victim 1 stated that they were queued with other vehicles in the single lane of traffic when they saw a black Ford Expedition approaching from behind, driving illegally on the right shoulder. Victim 1 moved their car partially onto the shoulder in front of the Expedition, attempting to "cut him off a little bit" and block the Expedition driver's effort to bypass traffic unlawfully. Victim 1 was unaware that the driver, later identified as Defendant, was associated with a law-enforcement agency. There were no markings on Defendant's vehicle that would identify it as law enforcement and the vehicle was not displaying or using lights or sirens.

After briefly using the vehicle to attempt to block Defendant from using the shoulder, Victim 1 returned the vehicle to the legal traffic lane. Defendant continued to travel on the shoulder but rather than continue to drive past the victims, he pulled alongside their vehicle, rolled down his window, and pointed a black handgun directly at Victim 1 and Victim 2. Victim 1 had a clear view of Defendant's appearance, saw that Defendant was wearing a black t-shirt, saw that the gun was pointed directly at their heads, saw that the gun was a Glock or Sig Sauer handgun with what appeared to be a red-dot sight, and noted that Defendant

yelled something indiscernible. The windows on Victim 1's car were closed, and the victims were not able to hear what Defendant was yelling. Victim 1 felt threatened for their safety and immediately called 911.

Victim 2 corroborated Victim 1's report. Victim 2 was in the front-passenger seat and saw the Expedition driving on the right shoulder of Hwy 62 "really, really fast." Victim 2 said that Victim 1 moved the car into the shoulder to "slow him down." Victim 2 explained that in response Defendant pulled alongside them, rolled down his window, and pointed his gun straight at Victim 2 and Victim 1. This caused Victim 2 to feel threatened and scared for their safety. As with Victim 1, Victim 2 was unaware that Defendant was a federal agent, noting that the Expedition had no markings to indicate it was being used by law enforcement.

Victim 2 shared with troopers two videos recorded with a cell phone after Defendant pointed his firearm at them. On the videos, Victim 1 and Victim 2 are driving behind Defendant and recording the back of the Expedition, which had an identifiable Utah license plate.

Statements of Defendant; Defendant's Partner; and Defendant's Supervisor

State Patrol investigators searched the Expedition's license plate in law-enforcement databases, determined that it was a rental vehicle, and learned that the vehicle had been leased to a male, M.V-C., who was later identified as an ICE employee. Troopers accessed license-plate-reader ("LPR") data, observed that the Expedition had passed by an LPR camera at the Federal Whipple Building recently, recognized that the Whipple Building is located on Hwy 62 near the location of the incident, and surmised that M.V-C. might travel back to the Whipple Building again. On Feb. 6, 2026, investigators learned that M.V-C. was at the Whipple building and that he was with his partner, who was later identified as Defendant. Investigators made arrangements to speak with M.V-C. and Defendant.

During his voluntary interview, Defendant admitted that he was driving the Expedition at the time of the encounter with the victims and that his partner, M.V-C., was in the backseat. Earlier in the day, he and his partner had been conducting surveillance on behalf of ICE in Minneapolis, but Defendant acknowledged that at the time of the encounter he was driving to the Whipple Building to end his shift and get gas. During his interview, Defendant made no claim that he was conducting any law-enforcement operation or activity or responding to any emergency situation during the incident. Defendant stated that he was driving on "the right" and that Victim 1 was driving on "the left." He stated that Victim 1 swerved over in front of him and cut him off. Defendant claimed that he feared for his safety and the safety of others so, in response, he pulled alongside Victim 1's vehicle, rolled down his window, drew his firearm, and yelled "Police Stop." He stated he was trying to get Victim 1 to "back up." Defendant acknowledged that his firearm was a Glock 19 with a laser light, which Defendant had holstered on his right hip at the time of the interview. Defendant stated that after he pulled the gun on Victim 1 and Victim 2 he got in front of their vehicle and drove to the Whipple Building.

M.V-C. confirmed that he was in the backseat of the Expedition at the time of the incident; that Defendant was driving; that they were traveling "back to base, last call;" and that the Expedition had no markings, decals, or lights to inform others that they were associated with law enforcement. He stated that Victim 1's vehicle was in the left lane, stopped in traffic, and that Defendant was driving on "the right." Victim 1 "[came] out" in front of them, requiring Defendant to slow down. In response, Defendant drove further to the right of Victim 1, drawing side-by-side; rolled down his window and yelled, "Police!" M.V-C. volunteered that by that point Defendant "already had the firearm with the window down."

Defendant's supervisor, an assistant field-office director for ICE, informed investigators that neither Defendant nor M.V-C. had reported this incident.

Filed in District Court
State of Minnesota
4/16/2026

Review of Footage from Traffic Cameras

Investigators reviewed footage from traffic cameras mounted on Hwy 62 from the time of the incident. The video shows slow moving traffic queued in the single lane of eastbound Hwy 62. At 4:21:54 PM, Victim 1's vehicle comes into view and is seen moving from the single traffic lane across a solid-white line and partially onto the right shoulder. At 4:21:56 PM, Defendant's vehicle comes into view. It is completely in the shoulder and appears to be slowing down. As the video continues, Victim 1 remained partially on the shoulder in front of Defendant until 4:22:01 PM, when Victims 1's vehicle returned to the traffic lane and Defendant veered further to the right and continued to drive fully in the shoulder. At that point, Defendant had an opportunity to proceed well past the victims or merge behind their vehicle. Rather than pass or merge, however, Defendant positioned his vehicle side-by-side with Victim 1's vehicle. Due to the angle of the camera and the distance from the incident, the traffic camera does not capture Defendant's gun-pointing conduct. But the footage does reveal that the two vehicles remained side-by-side from approximately 4:22:03 PM to 4:22:09 PM. At approximately 4:22:10, Defendant accelerated forward past Victims 1's vehicle, still driving illegally on the shoulder. Ahead of Defendant, the shoulder came to an end, requiring Defendant to finally merge into the traffic lane at 4:22:29 PM. At that time, Defendant merged directly in front of Victim 1's vehicle. At 4:22:50 PM, Victim 1 called 911 to report the gun pointing conduct. Defendant's vehicle then proceeded east on Hwy 62 in the direction of the Whipple Building.

Follow-up Interview with Victim 1

In a follow-up interview with investigators, after Victim 1 was informed that Defendant was an ICE agent, Victim 1 noted there were no markings on the Expedition or on Defendant's clothing to indicate that Defendant was affiliated with law enforcement. Instead, at the time of the incident, Victim 1 was led to believe only that there was a "crazy person driving down the road aiming guns at people, .... the type of individual that should [not] be out there but they are."

A warrant is necessary because there is a substantial likelihood that Defendant will fail to respond to a summons and because his present location is not reasonably discoverable.

MINNESOTA JUDICIAL BRANCH

## SIGNATURES AND APPROVALS

Filed in District Court
State of Minnesota
4/16/2026

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**

S. A. Schneider
Sergeant
3489 Hadley Ave N
Oakdale, MN 55128
Badge: 304

Electronically Signed:
04/16/2026 10:51 AM
Washington County, Minnesota

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

**Prosecuting Attorney**

Morgan D Kunz
Senior Assistant Hennepin County Attorney
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
04/16/2026 10:45 AM

MINNESOTA JUDICIAL BRANCH

Filed in District Court
State of Minnesota
4/16/2026

## 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: No Possession of Weapons; Remain Law Abiding; Make All Appearances

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: April 16, 2026.

**Judicial Officer** Paul R Scoggin
District Court Judge

Electronically Signed: 04/16/2026 11:09 AM

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

**COUNTY OF HENNEPIN**
**STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**GREGORY DONNELL MORGAN 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

Filed in District Court
State of Minnesota
4/16/2026

| | |
|---|---|
| **Name:** | GREGORY DONNELL MORGAN Jr |
| **DOB:** | 02/22/1991 |
| **Address:** | 2334 JAMESON ST<br>TEMPLE HILLS, MD 20748 |
| **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 #:** | 969851 |
| **SILS Tracking No.** | 3508265 |
| **Case Scheduling Information:** | Please process ASAP |
| **Alcohol Concentration:** | |

MINNESOTA JUDICIAL BRANCH

# STATUTE AND OFFENSE GRID

Filed in District Court
State of Minnesota
4/16/2026

| Cnt Nbr | Statute Type | Offense Date(s) | Statute Nbrs and Descriptions | Offense Level | MOC | GOC | Controlling Agencies | Case Numbers |
|---|---|---|---|---|---|---|---|---|
| 1 | Charge | 2/5/2026 | 609.222.1<br>Assault-2nd Degree-Dangerous Weapon | Felony | A2513 | | MNMHP0100 | 26401115 |
| | Penalty | 2/5/2026 | 609.11.5(a)<br>Minimum Sentences of Imprisonment-Firearm Use or Possession | Felony | A2513 | | MNMHP0100 | 26401115 |
| | Penalty | 2/5/2026 | 609.222.1<br>Assault-2nd Degree-Dangerous Weapon | Felony | A2513 | | MNMHP0100 | 26401115 |
| 2 | Charge | 2/5/2026 | 609.222.1<br>Assault-2nd Degree-Dangerous Weapon | Felony | A2513 | | MNMHP0100 | 26401115 |
| | Penalty | 2/5/2026 | 609.11.5(a)<br>Minimum Sentences of Imprisonment-Firearm Use or Possession | Felony | A2513 | | MNMHP0100 | 26401115 |
| | Penalty | 2/5/2026 | 609.222.1<br>Assault-2nd Degree-Dangerous Weapon | Felony | A2513 | | MNMHP0100 | 26401115 |

MINNESOTA JUDICIAL BRANCH