

STATE OF SOUTH DAKOTA  
: SS  
COUNTY OF MINNEHAHA

IN CIRCUIT COURT  
SECOND JUDICIAL CIRCUIT  
MAGISTRATE DIVISION

STATE OF SOUTH DAKOTA,  
Plaintiff  
vs.  
MANDRE CLOWN ADAMS,  
Defendant.

PD22-008705

**COMPLAINT**

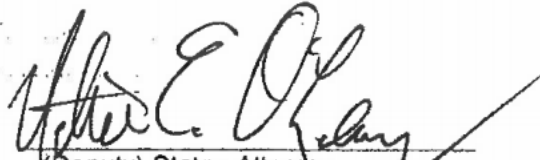
CR23-900

COUNT 1: RAPE (SECOND DEGREE) – CLASS 1 FEL as to MCA

The undersigned being first duly sworn on oath complains and charges:

COUNT 1

That the Defendant, MANDRE CLOWN ADAMS, in Minnehaha County, State of South Dakota, on or about the 27th day of April, 2022, did commit the public offense of Rape in the Second Degree (SDCL 22-22-1(2)) in that the Defendant did accomplish an act of sexual penetration with [REDACTED] through the use of force, coercion, or threats of immediate and great bodily harm against the victim or other persons within the victim's presence, accompanied by apparent power of execution, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of South Dakota.

  
(Deputy) States Attorney  
Minnehaha County, South Dakota

Subscribed and sworn to before me this 8th day of February, 2023.

  
My commission expires: 10/27/2028

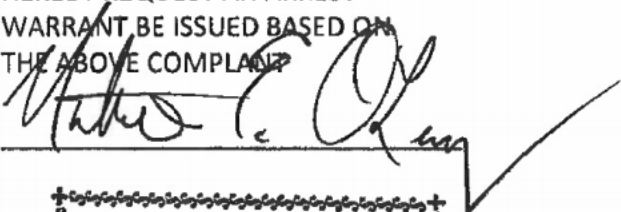
Initial Appearance Date:

DOB: [REDACTED] (MCA)

Address:  
TRANSIENT SIOUX FALLS, SD 57012 (MCA)

Arresting Officer: KASEY LANNING

REQUEST FOR ARREST WARRANT  
THE UNDERSIGNED ATTORNEY  
HEREBY REQUEST AN ARREST  
WARRANT BE ISSUED BASED ON  
THE ABOVE COMPLAINT



**FILED**  
FEB 13 2023

Minnehaha County, S.D.  
Clerk Circuit Court

ALEX BUSS  
NOTARY PUBLIC  
SOUTH DAKOTA



4. The victim went on to say that the suspect would not take no for an answer. During the interaction he kept asking if 'she trusted him' and at one point asked if he could be her boyfriend. The victim said during the whole interaction by the crates, she felt unsafe.
5. The victim stated that they arrived to the crate area around 2120 hours. While there she and the suspect were kissing, during this the suspect kept trying to put his hand in her pants and she told him no. The victim told the suspect "this is as far as it can go".
6. The suspect then grabbed the victim's head and forced it down to his penis and made her perform oral sex on him. The suspect had already asked her for oral sex and she had refused. The victim said she did not know how he had exposed his penis, but it was already out and erect. At this time the victim informed Officer Lanning that she was fearful of him and stopping things because he is stronger than she is.
7. The suspect then grabbed a yellow blanket to cover them up and he put his hand down the victim's pants. The victim informed him that she was on her period and had a tampon in. The suspect instructed her to remove her tampon, the victim removed it and layed it on the ground.
8. The suspect then inserted his penis into the victim's vagina, he did not wear and condom and ejaculated inside of her vagina. The victim stated that she was frozen in fear during and after the incident. After the suspect ejaculated he rolled over and went to sleep.
9. Officers went to the area the victim had described to attempt to find the suspect and any additional evidence. Officer Pollema and Office Millard checked the area. Officer Pollema observed a male wearing black pants, red long sleeve shirt, with paint-covered shoes laying on his side on a blue colored wood pallet with a dirty white colored fitted mattress sheet over him near him an Adidas gray and black colored backpack was laying on the ground. This individual was identified as the defendant.
10. Officer Millard said "Dre" which woke the defendant up. The defendant sat up and Officer Millard and observed that the defendant was covered in black tattoos, including a small cross along his left inner wrist, which would be consistent with the information provided by the victim. Officer Millard could see a pair of blue jeans laying across from the defendant's location to the North.

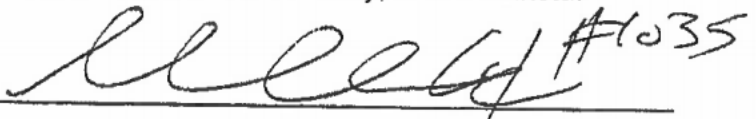
11. Officer Millard detained the defendant and read him his Miranda Rights and the defendant waved his rights and agreed to speak with Officer Millard. The defendant stated that he met a woman at The Banquet and that they had consensual sex. The defendant stated that the sexual encounter was the victim's idea and that he did not wear a condom and did not ejaculate.

12. The defendant also denied that oral sex had taken place. Buccal swabs were collected from the defendant.

13. The victim went to Avera McKennan Hospital to have a sexual assault kit completed.

14. The kit and buccal swabs were sent to the South Dakota Forensic Lab for testing. The results were "The DNA profile obtained from the sperm cell fraction of item 2.02/2.03 (internal genitalia/cervical swabs - [REDACTED]) is consistent with being a mixture of DNA from two individuals. The major contributor profile was able to be distinguished at some loci and is consistent with originating from Mandre Adams." "The DNA profile obtained from the sperm cell fraction of item 2.05 (perineal swabs - [REDACTED]) is consistent with being a mixture of DNA from two individuals. The major contributor profile was able to be distinguished, matches the DNA profile obtained from the known sample of Mandre Adams."

15. All these events took place in Sioux Falls, Minnehaha County, South Dakota.

 #1035

M.Black #1035

Subscribed and sworn before me

This 3<sup>rd</sup> day of November, 2022.



Notary Public

My Commission Expires 12/22/27

