

State of Minnesota  
County of Dakota

District Court  
1st Judicial District

Prosecutor File No. CA-2018-00562  
Court File No. 19HA-CR-18-806

**State of Minnesota,**  
Plaintiff,

**COMPLAINT**  
Warrant

vs.

**MARSHALL ANTHONY KNOLL DOB: 11/18/1958**

4322 145th St E  
Rosemount, MN 55068

Defendant.

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: 1st Degree Driving While Impaired (Schedule I or II Controlled Substance) (Prior Felony Conviction)**

Minnesota Statute: 169A.20.1(7), with reference to: 169A.24.1(2), 169A.24.2, 169A.276.1(a)  
Maximum Sentence: 3 to 7 years and/or \$4,200.00 - \$14,000.00  
Offense Level: Felony

Offense Date (on or about): 10/20/2017

Control #(ICR#): 17408959

Charge Description: On or about October 20, 2017, in the County of Dakota, Minnesota, MARSHALL ANTHONY KNOLL, did drive, operate or was in physical control of a motor vehicle within this state while the person's body contained any amount of a controlled substance listed in schedule I or II other than marijuana or tetrahydrocannabinols and the person has previously been convicted of a felony under this section.

**COUNT II**

**Charge: Criminal Vehicular Operation Resulting in Great Bodily Harm (Negligence and Sch I or II Controlled Substance Present)**

Minnesota Statute: 609.2113.1(6)  
Maximum Sentence: 0-5 Years and/or \$3,000.00 - \$10,000.00  
Offense Level: Felony

Offense Date (on or about): 10/20/2017

Control #(ICR#): 17408959

Charge Description: On or about October 20, 2017, in the County of Dakota, Minnesota, MARSHALL ANTHONY KNOLL, did cause great bodily harm to another not constituting attempted murder or assault as a result of operating a motor vehicle in a negligent manner while any amount of a controlled substance

listed in schedule I or II, or its metabolite, other than marijuana or tetrahydrocannabinols, is present in the person's body.

### COUNT III

**Charge: Criminal Vehicular Operation Resulting in Substantial Bodily Harm (Negligence and Sch I or II Controlled Substance Present)**

Minnesota Statute: 609.2113.2(6)

Maximum Sentence: 0-3 Years and/or \$3,000.00 - \$10,000.00

Offense Level: Felony

Offense Date (on or about): 10/20/2017

Control #(ICR#): 17408959

Charge Description: On or about October 20, 2017, in the County of Dakota, Minnesota, MARSHALL ANTHONY KNOLL, did cause substantial bodily harm to another as a result of operating a motor vehicle in a negligent manner while any amount of a controlled substance listed in schedule I or II, or its metabolite, other than marijuana or tetrahydrocannabinols, is present in the person's body.

### COUNT IV

**Charge: Driving After Cancelled Inimical to Public Safety**

Minnesota Statute: 171.24.5

Maximum Sentence: 0-1 Year and/or \$1,000.00 - \$3,000.00

Offense Level: Gross Misdemeanor

Offense Date (on or about): 10/20/2017

Control #(ICR#): 17408959

Charge Description: On or about October 20, 2017, in the County of Dakota, Minnesota, MARSHALL ANTHONY KNOLL, did willfully disobey an order canceling or denying the person's driver's license or driving privileges by operating a motor vehicle while the person's license or privileges were cancelled or denied under §171.04, subdivision 1, clause (10).

**STATEMENT OF PROBABLE CAUSE**

On October 20, 2017, law enforcement officers were dispatched to a four vehicle car accident that occurred in Vermillion Township, Dakota County, Minnesota.

M.L. provided that he was driving northbound on Highway 52 when a line of vehicles came to a complete stop in front of him. M.L. was at a complete stop when he was rear ended, causing his vehicle to collide with the vehicle in front of him. M.L. identified the vehicle that caused the crash as a truck. M.L. got out of his vehicle and observed the driver of the truck near his vehicle. The driver of the truck was later identified as MARSHALL ANTHONY KNOLL (DOB 11/18/1958). The truck was pulling a trailer at the time of the collision.

A.M. was also at a complete stop in the line of traffic when the vehicle behind him, traveling at a high rate of speed, failed to stop and rear ended his vehicle. A.M. provided that this truck did not show any indication of stopping and estimated that this truck rear ended his vehicle at highway speeds.

An officer spoke to a witness of the crash who was identified as M.H. She was driving northbound on Highway 52 when she observed a truck driving erratically. M.H. elected to drop behind the truck as she was concerned by the erratic driving. M.H. observed traffic slowing down. M.H. provided that the truck did not slow down and collided into the back of a car. M.H. did not see any brake lights on the truck. M.H. estimates the truck collided into the vehicle traveling approximately 50 miles per hour.

An officer made contact with KNOLL. In speaking with KNOLL, the officer observed that KNOLL had bloodshot and watery eyes, slurred speech, lethargic movements and he was unsteady on his feet. The officer asked KNOLL to complete standardized field sobriety tests (SFST). During the administration of those tests, KNOLL demonstrated signs of impairment. The officer subsequently drafted a search warrant for a blood sample, which was signed and executed and set to for further analysis at the Bureau of Criminal Apprehension (BCA). The results of the blood test revealed the presence of amphetamine and methamphetamine in KNOLL'S blood.

A.M. and K.M. were in the vehicle that KNOLL rear ended. K.M. sustained substantial injuries as a result of the collision including sternal fracture, fractured ribs, supracondylar humerus fracture and intraparenchymal hemorrhage (intracerebral bleeding).

A.M. sustained an injury to ligaments in his cervical spine that required surgical intervention for stabilization.

An inspection of KNOLL'S truck and trailer was completed. The front right and left turn lamps and hazard lamps on the truck were determined to be inoperable. The right front headlamp and right front clearance lamp were inoperable. The right and left turn lamps and hazard lamps on the rear of the truck were inoperable. The left rear lamp was mounted improperly and had a bungee holding it in place. The wiring harness for the trailer connection had two of seven wires removed that are required in order for the trailer lights and electric brakes to work properly. The power cord leading from the trailer to the truck had been cut and taped back together with electrical tape. The safety chains were held on to the trailer with a small broken piece of metal wire. The breakaway brakes on the truck were determined to be inoperable.

KNOLL was convicted of Felony DWI in violation of Minnesota Statutes § 169A.20, subdivision 2 on June 5, 2007. KNOLL'S driving status was determined to be cancelled as inimical to public safety.

KNOLL has 17 prior DWI convictions. A warrant is requested so that mandatory conditions of release pursuant to Minnesota Statutes § 169A.44, subdivision 2 can be established.

**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**

Brent Egan  
State Trooper  
3489 Hadley Ave N  
Oakdale, MN 55128  
Badge: 329

Electronically Signed:  
03/29/2018 12:27 PM  
Washington County, MN

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

**Prosecuting Attorney**

Cassandra Shepherd  
1560 Hwy 55  
Hastings, MN 55033-2392  
(651) 438-4438

Electronically Signed:  
03/29/2018 10:39 AM

