

State of Minnesota  
County of DakotaDistrict Court  
1st Judicial DistrictProsecutor File No. CA-2024-01406  
Court File No. 19HA-CR-24-1328

State of Minnesota,

Plaintiff,

vs.

SEBASTIAN CALDERON-GAMBOA DOB: 01/12/2001

Defendant.

**COMPLAINT**

Order of Detention

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: Criminal Vehicular Operation Resulting in Substantial Bodily Harm (Gross Negligence)**

Minnesota Statute: 609.2113.2(1)

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

Offense Level: Felony

Offense Date (on or about): 06/30/2024 to 06/30/2024

Control #(ICR#): 24404362

Charge Description: On or about June 30, 2024, in the County of Dakota, Minnesota, SEBASTIAN CALBERON-GAMBOA, did cause substantial bodily harm to another as a result of operating a motor vehicle in a grossly negligent manner.

**COUNT II****Charge: Criminal Vehicular Operation Resulting in Substantial Bodily Harm (Causes Collision and Leaves Scene)**

Minnesota Statute: 609.2113.2(7)

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

Offense Level: Felony

Offense Date (on or about): 06/30/2024 to 06/30/2024

Control #(ICR#): 24404362

Charge Description: On or about June 30, 2024, in the County of Dakota, Minnesota, SEBASTIAN CALBERON-GAMBOA, did cause substantial bodily harm to another as a result of operating a motor vehicle and left the scene of the collision in violation of Minn. Stat. 169.09, subd. 1 or 6.

On June 30, 2024, at approximately 1:25 a.m., Victim, a Dakota County Park Ranger, was driving his squad car southbound on Hwy 52 in the City of Inver Grove Heights, Dakota County, Minnesota, when he was struck from behind by another vehicle which fled the scene. The squad car came to rest in the center median against the cable barrier. The squad car sustained heavy damage and all the airbags deployed. There were long skid marks on the roadway leading to the area of impact between the vehicles on the roadway.

Another Dakota County Park Ranger, Witness 1, was driving southbound on Hwy 52 at the time of the crash. Witness 1 was driving in the right lane while Victim was driving in the left lane. Witness 1 observed two vehicles, a grey sedan, and a black Ford Focus (KSA954) approach from behind at a high rate of speed. The vehicles appeared to be racing and were tailgating each other. As the vehicles approached Witness 1, they moved into the left lane and passed Witness 1's squad car at a high rate of speed before moving back into the right lane. The vehicles were still tailgating each other when they collided with each other causing the black Focus to lose control and hit Victim's squad car. Victim's squad car then hit the center median guardrail head on. The grey sedan continued driving without stopping. The black Focus pulled over briefly before driving away. Witness 1 estimated the vehicles were travelling upwards of 90 MPH. MNDOT camera footage from before the crash is consistent with the two vehicles racing and shows them travelling at high speeds, passing traffic, and lane splitting.

The Focus was found abandoned in an apartment complex parking lot in Inver Grove Heights. The CarFax for the Focus showed it was serviced at an Inver Grove Heights auto shop on 6/7/2024. The repair order listed the customer as "Oscar Smith."

Law enforcement executed a search warrant at an apartment associated with the Focus. Residents reported that the driver of the Focus was Oscar Smith Molina Leguizamon (DOB: 9/29/2003) and provided text messages from MOLINA LEGUIZAMON discussing the crash. When Molina Leguizamon and the driver of the other vehicle, SEBASTIAN CALDERON-GAMBOA (1/12/2001), returned to the apartment law enforcement interviewed them.

Molina Leguizamon said he and CALDERON-GAMBOA were racing on Hwy 52 at high speeds,

and he crashed. Molina Leguizamon admitted he knew he hit a car and that it went into the ditch. Molina Leguizamon said he did not stop to see if anyone was injured. Rather, he fled because he was scared and did not have a license or insurance. Molina Leguizamon did not call 911 to report the crash. Molina Leguizamon said he was driving 110 MPH.

CALDERON-GAMBOA admitted he and Molina Leguizamon were driving on Hwy 52 on June 30, 2024, and that he was driving a grey Camry. CALDERON-GAMBOA denied racing Molina Leguizamon but admitted he was speeding. CALDERON-GAMBOA saw Molina Leguizamon crash and did not stop to see if anyone was injured and did not call 911.

Victim suffered a laceration to his left arm and complained of a bad headache and a stiff neck while with EMS at the scene. Victim refused additional medical care immediately following the crash and attempted to go to work the next day. Victim had to leave work early due to head pain, tiredness, dizziness, and confusion. Victim went to the emergency room on July 2, 2024, and was diagnosed with a concussion. Victim missed additional work shifts due to his symptoms.

Neither Molina Leguizamon nor CALDERON-GAMBOA have a valid driver's license.

MINNESOTA  
JUDICIAL  
BRANCH

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:  
07/05/2024 10:32 AM  
Washington County, MN

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

**Prosecuting Attorney**

Casey Schofield-Mork  
1560 Hwy 55  
Hastings, MN 55033-2392  
(651) 438-4438

Electronically Signed:  
07/05/2024 10:29 AM

**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: \$

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: July 5, 2024.

**Judicial Officer**

Ann M Offermann

Electronically Signed: 07/05/2024 11:12 AM

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

**COUNTY OF DAKOTA  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**Sebastian Calderon-Gamboa**

Defendant

**LAW ENFORCEMENT OFFICER RETURN OF SERVICE**  
I hereby Certify and Return that I have served a copy of this Order of Detention upon the Defendant herein named.

Signature of Authorized Service Agent: