

State of Minnesota
County of Dakota

District Court
1st Judicial District

Prosecutor File No. CA-2020-03306
Court File No. 19HA-CR-20-2956

State of Minnesota,
Plaintiff,

COMPLAINT
Warrant

vs.

JOSEPH JAVONTE WASHINGTON DOB: 10/06/1989


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: Criminal Sexual Conduct in the 1st Degree (Penetration) (Fear of Great Bodily Harm)

Minnesota Statute: 609.342.1(c), with reference to: 609.342.2(a), 609.342.2(b), 609.11.4

Maximum Sentence: 12-30 Years and/or \$12,000.00 - \$40,000.00

Offense Level: Felony

Offense Date (on or about): 11/28/2020 to 11/28/2020

Control #(ICR#): 20004076

Charge Description: On or about November 28, 2020, in the County of Dakota, Minnesota, JOSEPH JAVONTE WASHINGTON, did engage in sexual penetration with another person, and circumstances existing at the time of the act cause the complainant to have a reasonable fear of imminent great bodily harm to the complainant or another and at the time of offense, the Defendant or an accomplice did use a dangerous weapon, to wit: a knife.

COUNT II

Charge: Criminal Sexual Conduct in the 1st Degree (Penetration) (Dangerous Weapon)

Minnesota Statute: 609.342.1(d), with reference to: 609.342.2(a), 609.342.2(b), 609.11.4

Maximum Sentence: 12-30 Years and/or \$12,000.00 - \$40,000.00

Offense Level: Felony

Offense Date (on or about): 11/28/2020 to 11/28/2020

Control #(ICR#): 20004076

Charge Description: On or about November 28, 2020, in the County of Dakota, Minnesota, JOSEPH JAVONTE WASHINGTON, did engage in sexual penetration with another person, and the actor is armed with a dangerous weapon or any article used or fashioned in a manner to lead the complainant to reasonably believe it to be a dangerous weapon and use or threaten to use the weapon or article to cause the complainant to submit and at the time of offense, the Defendant or an accomplice did use a

dangerous weapon, to wit: a knife.

COUNT III

Charge: Criminal Sexual Conduct in the 1st Degree (Penetration) (Personal Injury) (Force or Coercion)

Minnesota Statute: 609.342.1(e)(i), with reference to: 609.342.2(a), 609.342.2(b), 609.11.4

Maximum Sentence: 12-30 Years and/or \$12,000.00 - \$40,000.00

Offense Level: Felony

Offense Date (on or about): 11/28/2020 to 11/28/2020

Control #(ICR#): 20004076

Charge Description: On or about November 28, 2020, in the County of Dakota, Minnesota, JOSEPH JAVONTE WASHINGTON, did engage in sexual penetration with another person, and the actor caused personal injury to the complainant and used force or coercion to accomplish the act and at the time of offense, the Defendant or an accomplice did use a dangerous weapon, to wit: a knife.

COUNT IV

Charge: Kidnapping (To Facilitate Felony or Flight) (Not Safe Release)

Minnesota Statute: 609.25.1(2), with reference to: 609.25.2(2), 609.11.4

Maximum Sentence: 0-40 Years and/or \$15,000.00 - \$50,000.00

Offense Level: Felony

Offense Date (on or about): 11/28/2020 to 11/28/2020

Control #(ICR#): 20004076

Charge Description: On or about November 28, 2020, in the County of Dakota, Minnesota, JOSEPH JAVONTE WASHINGTON, did confine or remove a person from one place to another, without the person's consent or, if the person is under the age of 16 years, without the consent of the person's parents or other legal custodian, to facilitate commission of a felony or flight thereafter, and the victim was not released in a safe place and at the time of offense, the Defendant or an accomplice did use a dangerous weapon, to wit: a knife.

COUNT V

Charge: Assault in the 2nd Degree (Dangerous Weapon)

Minnesota Statute: 609.222.1, with reference to: 609.11.4

Maximum Sentence: 0-7 Years and/or \$4,200.00 - \$14,000.00

Offense Level: Felony

Offense Date (on or about): 11/28/2020 to 11/28/2020

Control #(ICR#): 20004076

Charge Description: On or about November 28, 2020, in the County of Dakota, Minnesota, JOSEPH JAVONTE WASHINGTON, did assault another with a dangerous weapon and at the time of offense, the Defendant or an accomplice did use a dangerous weapon, to wit: a knife.

STATEMENT OF PROBABLE CAUSE

On November 28, 2020, Lakeville Police received a report of an assault that occurred in Lakeville, Dakota County, MN. The reporting party told police that her daughter (hereinafter Victim) had called her from an ambulance enroute to a hospital. Victim reported to her mother that her ex-boyfriend, Joseph Javonte Washington (DOB 10/6/1989)(hereinafter defendant), had attacked her. Defendant and victim dated on and off for two years. Law enforcement officers were called and talked to the victim at the hospital about what had occurred. Victim reported that she had returned home to her residence in the evening hours of November 28, 2020, to find that defendant was inside of her residence. Victim's residence is located in Lakeville, MN. Victim and defendant began talking. At some point, defendant began using victim's phone without her permission. When she asked for her phone back, defendant punched victim in the face and victim fell to the ground and hit her head on a tv stand. Defendant then grabbed victim by the hair, punched her in the face again, and dragged victim into her bathroom by her hair. Defendant then demanded that the victim perform oral sex on him.

When victim tried to leave the bathroom, defendant slammed the door shut and told victim she wasn't going anywhere. Defendant then brandished a knife from his pocket and threatened to stab and kill the victim if she tried to leave. Victim recognized the knife as being one from her own kitchen set.

Defendant again threatened to kill victim and demanded that victim get into the shower. When defendant ordered victim into the shower, he forcibly removed victim's diabetic pump. Defendant got into the shower with victim and again demanded that she perform oral sex on defendant. Throughout the assault, defendant repeatedly threatened to kill victim and told her she was going to die tonight, at one point saying, "you need to give me head like a fucking porn star or I'm going to fucking murder you". Defendant repeatedly punched victim while she was performing oral sex on him.

Defendant eventually pulled victim out of the bathroom by her hair and demanded that she get dressed. Victim was only able to put a robe on before defendant again grabbed her hair and dragged her out to the garage. After briefly entering the garage with victim, defendant dragged victim back into the kitchen, where he took two knives out of the kitchen and dragged her back into her garage. Defendant was still naked during this time.

Defendant demanded victim get into her car and start driving and the victim complied. While the victim drove, defendant demanded that she speed and not stop for any red lights. Defendant threatened to stab victim if she crashed the car and punched victim every time she attempted to slow down. Defendant had a knife at victim's throat at times throughout the drive. Defendant eventually grabbed the steering wheel and the car crashed in the City of St. Paul, Ramsey County. Defendant took off running, leaving victim in the crashed car. Victim was initially unable to get out of the car as her door was stuck, but she eventually was able to remove herself from the car and flag down a passing motorist for help.

During the sexual assault, defendant used victim's cell phone to record her and livestream the video on victim's Facebook and Snapchat accounts. Victim later provided police with two videos of the assault taken by the defendant. Defendant can be heard threatening to kill victim throughout the videos while she performed oral sex on him. At times during the video, the victim can be heard crying. Victim has visible injury to her eye in the video. Victim received multiple text messages from friends alerting her to the broadcast.

Police searched victim's apartment and observed knives on the floor and evidence of an altercation in the living room. Blood droplets were observed in the living room, near the bathroom, and in the bathroom. Soaking wet male and female clothing was found in the bathtub.

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

Troy J Hokanson
Detective
9237 183rd Street W
Lakeville, MN 55044
Badge: 4849

Electronically Signed:
12/01/2020 02:15 PM
Dakota County, Minnesota

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

Prosecuting Attorney

Emily Froehle
1560 Hwy 55
Hastings, MN 55033-2392
(651) 438-4438

Electronically Signed:
12/01/2020 01:50 PM

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 on _____, _____ at _____ AM/PM before the above-named court at 1560 W Highway 55 Dakota County Judicial Center, Hastings, MN 55033 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*

This warrant may be executed at any time of the day or night and on Sundays or legal holidays.

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: \$1,000,000.00

Conditions of Release: Do not leave MN w/o written court approval; Surrender all firearms, destructive devices or dang. weapons and do not live in a residence where others possess firearms; No contact with the victim, excluded from victim's residence and a 1 mile radius, No use/possession of firearms, ammunition, explosives or dangerous weapons; No use/possession of alcohol or controlled substances; Random chemical testing; Remain law abiding; Make all court appearances; Keep Court/Atty informed of current address

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: December 1, 2020.

Judicial Officer Arlene M. A. Perkkio
Judge of District Court

Electronically Signed: 12/01/2020 02:59 PM

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

**COUNTY OF DAKOTA
STATE OF MINNESOTA**

State of Minnesota

Plaintiff
vs.

Joseph Javonte Washington
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

Name: Joseph Javonte Washington
DOB: 10/06/1989
Address: [REDACTED]

Alias Names/DOB:

SID:

Height: 5' 5"

Weight: 150lbs.

Eye Color: Brown

Hair Color: Black

Gender: MALE

Race: Black

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: No

Driver's License #: [REDACTED] (MN)

Alcohol Concentration:

STATUTE AND OFFENSE GRID

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	11/28/2020	609.342.1(c) Criminal Sexual Conduct-1st Degree-Penetration - Fear Great Bodily Harm	Felony	L1217	N	MN0191100	20004076
	Modifier	11/28/2020	609.11.4 Minimum Sentences of Imprisonment-Use Dangerous Weapon	Felony	L1217	N	MN0191100	20004076
	Penalty	11/28/2020	609.342.2(b) Criminal Sexual Conduct-1st Degree-Penalty-Presumptive 144 mo.	Felony	L1217	N	MN0191100	20004076
	Penalty	11/28/2020	609.342.2(a) Criminal Sexual Conduct-1st Degree-Penalty-Stat Max	Felony	L1217	N	MN0191100	20004076
2	Charge	11/28/2020	609.342.1(d) Criminal Sexual Conduct-1st Degree-Penetration -Armed w/Danger Weapon	Felony	L2217	N	MN0191100	20004076
	Modifier	11/28/2020	609.11.4 Minimum Sentences of Imprisonment-Use Dangerous Weapon	Felony	L2217	N	MN0191100	20004076
	Penalty	11/28/2020	609.342.2(b) Criminal Sexual Conduct-1st Degree-Penalty-Presumptive 144 mo.	Felony	L2217	N	MN0191100	20004076
	Penalty	11/28/2020	609.342.2(a) Criminal Sexual Conduct-1st Degree-Penalty-Stat Max	Felony	L2217	N	MN0191100	20004076
3	Charge	11/28/2020	609.342.1(e)(i) Criminal Sexual Cond-1st Degree-Penetration/Contact - Injury - Use Force/Coerce	Felony	L2317	N	MN0191100	20004076
	Modifier	11/28/2020	609.11.4 Minimum Sentences of Imprisonment-Use Dangerous Weapon	Felony	L2317	N	MN0191100	20004076
	Penalty	11/28/2020	609.342.2(b) Criminal Sexual Conduct-1st Degree-Penalty-Presumptive 144 mo.	Felony	L2317	N	MN0191100	20004076
	Penalty	11/28/2020	609.342.2(a) Criminal Sexual Conduct-1st Degree-Penalty-Stat Max	Felony	L2317	N	MN0191100	20004076
4	Charge	11/28/2020	609.25.1(2) Kidnapping-To Facilitate Felony or Flight	Felony	K3231	N	MN0191100	20004076
	Penalty	11/28/2020	609.25.2(2) Kidnap-Not Release Safe Place-Great Bodily Harm or U/16 - Sentence	Felony	K3231	N	MN0191100	20004076
	Modifier	11/28/2020	609.11.4 Minimum Sentences of Imprisonment-Use Dangerous Weapon	Felony	K3231	N	MN0191100	20004076
5	Charge	11/28/2020	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2531	N	MN0191100	20004076
	Modifier	11/28/2020	609.11.4 Minimum Sentences of Imprisonment-Use Dangerous Weapon	Felony	A2531	N	MN0191100	20004076