

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 18A15381
Court File No. 27-CR-18-30779

State of Minnesota,

Plaintiff,

vs.

ANDRE DONNELL JACKSON DOB: 02/18/1987

6426 36TH AVE N
CRYSTAL, MN 55427

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: Kidnapping-To Facilitate Felony or Flight

Minnesota Statute: 609.25.1(2), with reference to: 609.25.2(2), 609.11.5(a)

Maximum Sentence: 40 YEARS AND/OR \$50,000

Offense Level: Felony

Offense Date (on or about): 12/16/2018

Control #(ICR#): 18410759

Charge Description: That on or about 12/16/2018, in Hennepin County, Minnesota, ANDRE DONNELL JACKSON confined victim from one place to another without her consent, in order to facilitate commission of a felony or flight thereafter, and D.F. was not released in a safe place while using a firearm.

Minimum Sentence: 3 YEARS

COUNT II

Charge: Kidnapping-To Commit Great Bodily Harm/Terrorize

Minnesota Statute: 609.25.1(3), with reference to: 609.25.2(2), 609.11.5(a)

Maximum Sentence: 40 YEARS AND/OR \$50,000

Offense Level: Felony

Offense Date (on or about): 12/16/2018

Control #(ICR#): 18410759

Charge Description: That on or about 12/16/2018, in Hennepin County, Minnesota, Andre Donnell Jackson confined D.F. from one place to another without her consent, in order to terrorize her, and D.F. was not released in a safe place, while using a firearm.

COUNT III

Charge: Assault-2nd Degree-Dangerous Weapon

Minnesota Statute: 609.222.1, with reference to: 609.222.1, 609.11.5(a), 609.101.2

Maximum Sentence: 7 YEARS AND/OR \$4,200-\$14,000

Offense Level: Felony

Offense Date (on or about): 12/16/2018

Control #(ICR#): 18410759

Charge Description: That on or about 12/16/2018, in Hennepin County, Minnesota, ANDRE DONNELL JACKSON, assaulted D.F., while using a firearm.

Minimum Sentence: 3 YEARS

STATEMENT OF PROBABLE CAUSE

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

On or about December 16, 2018, officers with the Minneapolis Police Department responded to a reported kidnapping. Upon arrival, officers spoke with witness K.R. K.R. informed officers that he was walking with the adult female victim D.F., Victim herein, near the intersection of Broadway and Emerson Avenue North, Minneapolis, Hennepin County, Minnesota when they noticed a blue Dodge Durango following them. K.R. and Victim got nervous because Victim feared retaliation due to a prior incident. K.R. and Victim began to walk to a nearby McDonalds because they knew McDonalds typically had a security guard working and video surveillance. Once in the parking lot of McDonalds, ANDRE DONNELL JACKSON JR., Defendant herein, and PATRICE MARIE THOMAS, Co-Defendant herein, exited the Durango and approached Victim. K.R. saw the Co-Defendant had a handgun in her waistband. Defendant immediately assaulted the victim by punching her in the head while the Co-Defendant yelled at Victim. Defendant and Co-Defendant then grabbed Victim and forcibly dragged Victim into the Durango. Defendant and Co-Defendant then drove off with Victim in the Durango.

Officers subsequently responded to a known address on Emerson Avenue, Minneapolis, Hennepin County, Minnesota on the report of an assault. Upon arrival, officers found Victim and observed she had a gunshot wound to her left shoulder and several injuries to her face and head. Victim identified Defendant and Co-Defendant as her assailants. Victim informed officers that she knows both Defendant and Co-Defendant. Victim was walking down the street with K.R. Victim noticed the Durango following them. Defendant and Co-Defendant exited the Durango and approached Victim. Defendant and Co-Defendant then forcibly placed Victim in the Durango. Victim reported that after she was in the Durango, Co-Defendant handed Defendant a handgun and Defendant began to strike Victim with the handgun in the face and head. Co-Defendant was driving the vehicle and yelling at Victim while the Defendant was assaulting her. Victim then jumped from the moving vehicle to escape.

Officers spoke to Victim at the hospital. Victim reported Defendant shot her as she was attempting to escape. Victim heard Co-Defendant yell to Defendant that he had to shoot her.

In a post Miranda interview, Defendant admitted punching Victim in the McDonalds parking lot, holding her down in the back of the Durango, pulling a handgun on her, and shooting her as she escaped the Durango.

In a post Miranda interview, Co-Defendant admitted Victim was in the Durango while she drove, that Codefendant Jackson had a gun when Victim was in the car, and hearing a gunshot.

Officers reviewed video surveillance footage that shows Defendant punch Victim and Defendant and Co-Defendant forcibly drag Victim into the Durango.

Your Complainant is aware Defendant is in custody.

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

Scott A Olson
Sergeant
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 5315

Electronically Signed:
12/19/2018 11:39 AM
Hennepin County, Minnesota

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

Prosecuting Attorney

Jason Heaser
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
12/19/2018 11:33 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 on _____, _____ at _____ AM/PM before the above-named court at 300 S Sixth Street, Minneapolis, MN 55487 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:

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 19, 2018.

Judicial Officer

Jeannice M. Reding
District Court Judge

Electronically Signed: 12/19/2018 11:52 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.

Andre Donnell Jackson

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:

DEFENDANT FACT SHEET

Name: Andre Donnell Jackson
DOB: 02/18/1987
Address: 6426 36TH AVE N
CRYSTAL, MN 55427

Alias Names/DOB: ANDRE DONNELL JR DONNELL JACKSON DOB: 2/18/1987
SID: MN06054997

Height:
Weight:
Eye Color:
Hair Color:

Gender: MALE
Race: Black
Fingerprints Required per Statute: Yes
Fingerprint match to Criminal History Record: Yes

Driver's License #:
SILS Person ID #: 547411
SILS Tracking No. 3072796
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	12/16/2018	609.25.1(2) Kidnapping-To Facilitate Felony or Flight	Felony	K3222		MN0271100	18410759
	Penalty	12/16/2018	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	K3222		MN0271100	18410759
	Penalty	12/16/2018	609.25.2(2) Kidnap-Not Release Safe Place-Great Bodily Harm or U/16 - Sentence	Felony	K3222		MN0271100	18410759
2	Charge	12/16/2018	609.25.1(3) Kidnapping-To Commit Great Bodily Harm/Terrorize	Felony	K3322		MN0271100	18410759
	Penalty	12/16/2018	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	K3322		MN0271100	18410759
	Penalty	12/16/2018	609.25.2(2) Kidnap-Not Release Safe Place-Great Bodily Harm or U/16 - Sentence	Felony	K3322		MN0271100	18410759
3	Charge	12/16/2018	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2222		MN0271100	18410759
	Definition	12/16/2018	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	A2222		MN0271100	18410759
	Penalty	12/16/2018	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	A2222		MN0271100	18410759
	Penalty	12/16/2018	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2222		MN0271100	18410759