

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 15A50826  
Court File No. 27-CR-15-33518

**State of Minnesota,**

Plaintiff,

vs.

**JOSHUA LEWIS DUANE DOW DOB: 01/03/1984**

5746 33RD AVE S  
Minneapolis, MN 55417

Defendant.

**COMPLAINT**

Order of Detention

Amended

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: 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): 11/21/2015

Control #(ICR#): 15430383

Charge Description: That on or about 11/21/2015, in Hennepin County, Minnesota, JOSHUA LEWIS DUANE DOW, assaulted LJRJ, while possessing a firearm.

**COUNT II**

**Charge: Interference With Dead Body-Concealing Evidence**

Minnesota Statute: 609.502.1

Maximum Sentence: 1 year/\$3000

Offense Level: Gross Misdemeanor

Offense Date (on or about): 11/21/2015

Control #(ICR#): 15430383

Charge Description: That on or about 11/21/2015, in Hennepin County, Minnesota, JOSHUA LEWIS DUANE DOW intentionally interfered with the body of a deceased person, AKJ, and a scene of death with intent to mislead the coroner or conceal evidence.

**COUNT III**

**Charge: Drugs - 1st Degree - Sale - 10 Grams or More-Cocaine/Heroin/Meth w/in 90-Day Period**

Minnesota Statute: 152.021.1(1), with reference to: 609.101.3

Maximum Sentence: 30 years/\$1,000,000

Offense Level: Felony

Offense Date (on or about): 11/21/2015

Control #(ICR#): 15430383

Charge Description: That on or about 11/21/2015, in Hennepin County, Minnesota, JOSHUA LEWIS DUANE DOW unlawfully sold, gave away, bartered, delivered, exchanged, distributed, disposed of to another, offered to sell, agreed to sell, manufactured or possessed with intent to sell one or more mixtures of a total weight of 10 grams or more containing cocaine, heroin or methamphetamine.

## STATEMENT OF PROBABLE CAUSE

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

On November 18, 2015, two people reported their daughter, AKJ, missing in Carver County, Minnesota. They were directed to the Minneapolis police department, because AKJ lived in Minneapolis, Hennepin County, Minnesota where they filed a report on November 21, 2015. DJ and CGJ reported that their daughter had been missing since 4:30 on November 18, 2015. AKJ has a daughter with JOSHUA LEWIS DUANE DOW date of birth 1/3/1984 (defendant herein), and her parents reported it was unusual for her to be out of communication with her daughter or with them for such a long period of time. They indicated that the last time they had communicated with her was on November 18, 2015 and that AKJ typically communicated very regularly on Facebook or by phone.

The defendant came with DJ and CGJ to file the missing persons report with the Minneapolis Police Department, and told police that the last day he had seen AKJ was on Wednesday, November 18, 2015 when they had gone to Downtown Cabaret with her and his brother LJRD. After Downtown Cabaret closed, the defendant stated that he and his brother saw AKJ walking down the street and had asked her to get in the car with them but she had refused. At that time, the defendant told police that was the last time he had seen her.

After AKJ's parents left the station, the defendant came back and gave more information. He said that AKJ had left like this twice in the past- once in January and once a few weeks ago. He indicated that they had recently argued, because he was seeing someone else, that it had gotten physical, and that he had asked her to move out. The defendant participated in placing flyers with AKJ's image on them in his attempt to locate her.

On November 22, 2015, LJRD came into the Police Department to advise that AKJ was deceased and that he had assisted the defendant in moving the body out of their home on Vincent Avenue in Minneapolis, Hennepin County. LJRD said that on November 18, 2015, he heard a loud noise and the defendant came in and told him that he had dropped a gun, and it had gone off. Later that same day, the defendant came to him and told him that AKJ had shot herself and he needed help moving the body. LJRD said that the defendant put a gun to his head and said that he would kill LJRD if he did not help him, so he did help the defendant move her body to a warehouse in Minneapolis. LJRD did not see AKJ's condition, because she was already wrapped up in plastic and carpet before helping the defendant move her. He told police that he had also helped the defendant dispose of the couch where the defendant said AKJ had shot herself, and paint the walls in the area she shot herself to cover up the blood. LJRD also said that he had helped the defendant bury some drugs and a digital scale in a backyard in Minneapolis. Officers subsequently located a scale and approximately 3 grams of what field tested positive for cocaine in the yard where LJRD said they had buried the drugs.

LJRD brought police to the warehouse to show them where they had put AKJ's body. However, when they arrived, AKJ was no longer in the closet where they had put her. LJRD appeared very shocked to see that the closet where they had put AKJ was empty. When officers arrived on November 23, 2015, with LJRD, they smelled what their experience led them to believe was decomposing flesh. Officers subsequently followed up with warehouse personnel. One witness indicated that he had seen the defendant at the warehouse on Sunday, November 22, 2015, and that the defendant was washing off tarps and putting boxes on a cart.

Officers subsequently learned that the defendant was at an address in north Minneapolis and located him

in a garage there. Located in the garage with the defendant were plastic bags that field tested positive for cocaine and weighed 12.3 grams. There was also a gun nearby on the garage floor. The defendant was arrested with a large amount of cash on him.

The owner of the home, HM, was interviewed and indicated the defendant had picked her up earlier from work on November 23rd. They drove around for a period of time and when they pulled up to the defendant's mom's house, he saw that the police were there and he immediately left the home without getting out of the car. The defendant then began using what appeared to be cocaine from baggies he had gotten from the back of the truck and was upset. When HM asked him what was wrong, he said "she's gone." He then said "I did it, I did it." He then quickly said the victim had shot herself. He told her that he had dismembered the body and brought the body parts to several locations. The entire time the defendant was talking to HM, he had a silver handgun in his lap, and HM was shocked by what he said and extremely fearful. They went to pick up a friend and went back to HM's home. The defendant said he was going to go park his truck away from her house and that he would go into her garage. HM was very frightened after the defendant told her what he had done, and she called 911 when she got into the house. Police then arrived, arrested the defendant, and located the cocaine and the gun in the garage.

While in the squad car, the defendant stated that AKJ killed herself in front of him and that he panicked when she did that. He believed that she did it because they had been arguing, and she was going to get the last word by sending him to prison for her death. He also admitted to police that he had disposed of her body but did not disclose where AJK was located. The defendant subsequently told people that he had cocaine on him that he was going to sell at the time of his arrest, and that he sells drugs to pay his bills.

Numerous witnesses indicated the defendant and the victim argued frequently. One witness indicated that the defendant would come to work angry and say that the victim was cheating on him. Another witness indicated that they had seen the defendant and the victim arguing, but had not seen any physical abuse. However, that same witness had seen the victim with bruises. The defendant admitted to police early in the investigation that he and the victim had gotten into a fight that had turned physical recently. The defendant said that the victim had hit him and slapped him, and he had knocked the victim down and had split her lip.

## 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**

Robert Dale  
Sergeant  
350 S 5th St  
Minneapolis, MN 55415-1389  
Badge: 1414

Electronically Signed:  
01/14/2016 03:54 PM  
Hennepin County, Minnesota

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

**Prosecuting Attorney**

Cheri Townsend  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
01/14/2016 03:48 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 401 Fourth Avenue S, Minneapolis, MN 55415 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: \$500,000.00

Conditions of Release: No Possession of Weapons; No Contact with Address; No Contact with Witnesses; No Internet Use; Random UAs

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: January 14, 2016.

**Judicial Officer**

Jamie Anderson  
judge

Electronically Signed: 01/14/2016 04:31 PM

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

**COUNTY OF HENNEPIN  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**JOSHUA LEWIS DUANE DOW**

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: