

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 22A02761  
Court File No. 27-CR-22-21091

**State of Minnesota,**

Plaintiff,

vs.

**JAMES ANDREW WORKS DOB: 05/17/1973**

2340 32nd St E  
#108  
Minneapolis, MN 55406

Defendant.

**COMPLAINT**

Warrant

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-1st Degree-Penetration -Armed w/Danger Weapon**

Minnesota Statute: 609.342.1(d), with reference to: 609.342.2(a), 609.342.2(b), 609.101.2, 609.342.2(c)  
Maximum Sentence: 30 YEARS AND/OR \$12,000-\$40,000, PLUS CONDITIONAL RELEASE  
Offense Level: Felony

Offense Date (on or about): 06/26/2010

Control #(ICR#): 10186270

Charge Description: That on or about 6/26/2010, in Hennepin County, Minnesota, JAMES ANDREW WORKS, engaged in sexual penetration with Victim 1, and JAMES ANDREW WORKS, while armed with a dangerous weapon or any article used or fashioned in a manner to lead the victim to reasonably believe it to be a dangerous weapon, used or threatened to use the weapon to cause the victim to submit, to wit: a fireram.

**COUNT II**

**Charge: Criminal Sexual Conduct-1st Degree-Penetration -Armed w/Danger Weapon**

Minnesota Statute: 609.342.1(d), with reference to: 609.11.5(a), 609.342.2(a), 609.342.2(b), 609.101.2, 609.342.2(c)  
Maximum Sentence: 30 YEARS AND/OR \$12,000-\$40,000, PLUS CONDITIONAL RELEASE  
Offense Level: Felony

Offense Date (on or about): 06/26/2010

Control #(ICR#): 10186270

Charge Description: That on or about 6/26/2010, in Hennepin County, Minnesota, JAMES ANDREW WORKS, engaged in sexual penetration with Victim 2, and JAMES ANDREW WORKS, while armed with a dangerous weapon or any article used or fashioned in a manner to lead the victim to reasonably believe

it to be a dangerous weapon, used or threatened to use the weapon to cause the victim to submit to wit  
a firearm.

Minimum Sentence: 3 YEARS

**COUNT III**

**Charge: Kidnapping-Confine/Remove Any Person-No Consent**

Minnesota Statute: 609.25.1, with reference to: 609.25.2, 609.25.2(1)

Maximum Sentence: 20 YEARS AND/OR \$35,000

Offense Level: Felony

Offense Date (on or about): 06/26/2010

Control #(ICR#): 10186270

Charge Description: That on or about 6/26/2010, in Hennepin County, Minnesota, JAMES ANDREW WORKS confined or removed Victim 1 from one place to another without her consent in order to facilitate commission of any felony or flight thereafter.

**COUNT IV**

**Charge: Kidnapping-Confine/Remove Any Person-No Consent**

Minnesota Statute: 609.25.1, with reference to: 609.25.2, 609.25.2(1)

Maximum Sentence: 20 YEARS AND/OR \$35,000

Offense Level: Felony

Offense Date (on or about): 06/26/2010

Control #(ICR#): 10186270

Charge Description: That on or about 6/26/2010, in Hennepin County, Minnesota, JAMES ANDREW WORKS confined or removed Victim 2 from one place to another without her consent in order to facilitate commission of any felony or flight thereafter.

**STATEMENT OF PROBABLE CAUSE**

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

On or about June 26, 2010, Minneapolis police officers received the report that two women were sexual assaulted by an unknown male in Minneapolis, Hennepin County, Minnesota. The females, Victim 1 and Victim 2 herein, reported that they were standing on the corner near a bus stop when they were approached by an unknown male, later identified as JAMES ANDREW WORKS, Defendant herein, with a gun. Defendant directed them to a secluded location behind a garage where he sexually assaulted them. Victim 1 reported that Defendant forced her to perform oral sex on him and digitally penetrated her vaginally. She stated he made the victims switch back and forth several times, making each victim engage in oral sex on the suspect. Victim 2 reported that he held a gun to them and threatened to shoot them if they screamed or tried to call for help. Defendant masturbated and ejaculated on the ground. He fled the area and the victims were able to call 911. When officers arrived at the scene, the victims directed them to the location of the assaults and where they observed him ejaculate on the ground. The MPD Crime lab processed the scene and swabbed what looked like semen on the ground.

Victims were taken to the hospital where sexual assault examinations were conducted. The sexual assault kits, including biological samples, sent to the Bureau of Criminal Apprehension (BCA) where they were processed for DNA testing. In 2010, the BCA issued a report requesting both victim's consensual sex partners submit a DNA sample due to the victims reporting recent sexual activity before they would continue DNA testing. The investigator assigned to the case at the time had been unable to reach the victims after the assault and therefore the requested samples were never obtained.

In 2021, as part of ongoing efforts to investigate previously untested sexual assault kits, the BCA agreed to complete the DNA testing on the victims' sexual assault kits without waiting for the previously requested DNA samples. In September 2021, the BCA completed the DNA testing and were able to identify the DNA profile from Victim 1's vaginal swab matched the DNA profile from Defendant's offender sample.

On June 25, 2021, Investigators met with Victim 1 who stated she spent years trying to forget about that assault. She provided a statement consistent with her initial report from more than ten years earlier. Victim 1 was later shown a photograph of Defendant and she identified him as the male who raped her. She also later admitted Defendant also penetrated her vagina with his penis.

On October 14, 2021, the investigator was able to identify and locate Victim 2 who reported that this sexual assault has bothered her for many years and that she never told anyone what had happened to her. She said that she did not understand why the police had not gotten ahold of her after the assault. Victim 2 admitted she had used a false name because she was afraid that she would have been in trouble. She recalled that night, Victim 1 invited her to go with her to meet up with a "party" in south Minneapolis and believed Victim 1 may have posted an ad online. Victim 2 recalled getting a ride to Minneapolis and talking to the male on the phone, who directed them where to stop. She stated she recalled they got out of the car and began walking around but did not see anyone matching the description of the man she thought they were going to meet. Victim 2 stated a heavy-set black male approached them with his hand in his waistband, which he then pointed at them. He told them to walk with him and cocked the gun when she resisted. She said that Victim 1 told her to comply and follow the suspect. She described how the suspect brought them behind a series of garages behind a townhouse complex where he made them take their underwear off and he put them in his pocket. She described how he took turns assaulting them while the other one was nearby. Victim 2 described how the suspect made each of them perform oral sex on him while he would put his fingers in their vaginas. She said at one point he made them walk across Nicollet to

a park area that is located on the southeast side of Nicollet Avenue near 63rd Avenue in Richfield. She said he walked them to a park bench where he sat down and made them sit on top of him and he would penetrate their vaginas with his penis. Victim 2 said that she did not think that the suspect ejaculated in her vagina. She said that at the park he moved them again to another location in the park where they were secluded by some bushes. She said that at one point the suspect started masturbating himself and ejaculated on the ground. She said that he then ran off. Victim 2 was shown a photograph of Defendant and she confirmed that he was the man who sexually assaulted them at gun point.

Victim 2's sexual assault kit was also examined at the BCA. They completed DNA profiling of the y-chromosome of the DNA profile identified from her chin swab. The y-chromosomal profile matches Defendant and neither him nor any of his paternally related male relatives can be excluded as the contributor of this male DNA.

The BCA completed DNA testing on the swab of the substance on the ground near the garage. It was determined that sperm cell fractions from the swab consisted of a single source of male DNA that matches Defendant. The match would not be expected to occur more than once among unrelated individuals in the world population. The DNA profile obtained from the sperm cell fractions from Victim 1's perineal swab and non-sperm cell fraction from her vaginal swab also matched Defendant's DNA profile and would not be expected to occur more than once among unrelated individuals in the world population.

Investigators learned Defendant was named as a suspect in several other sexual assault cases in Minneapolis in the past. In those cases, Defendant met women online and made arrangements to meet using false names such as "Jordan" or "Jason." On August 16, 2022, Investigators went to Defendant's residence, and he agreed to speak with them. Defendant conceded he previously met women in the past on Craigslist and Backpages but denied ever paying someone to sex with him. He claimed the reason women accused him of rape was because they were mad at him and wanted to get back at him. He admitted using false names in the past and responded to the name "Jason" during the conversation with investigators. Defendant was shown photographs of both Victim 1 and Victim 2 and denied having sex with either of them.

Defendant is not currently 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**

Christine Patino  
Sgt  
350 S 5th St  
Minneapolis, MN 55415-1389  
Badge: 5575

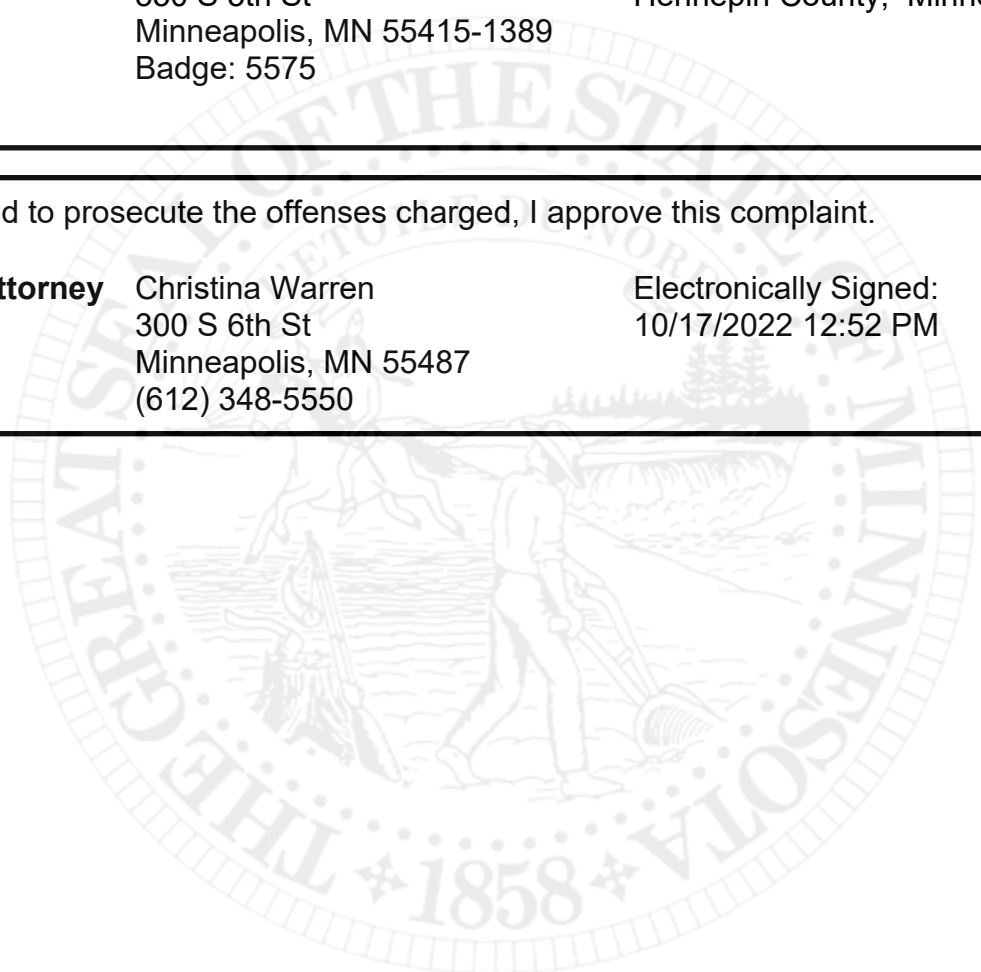
Electronically Signed:  
10/20/2022 12:37 PM  
Hennepin County, Minnesota

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

**Prosecuting Attorney**

Christina Warren  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
10/17/2022 12:52 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 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: \$1,000,000.00  
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: October 20, 2022.

**Judicial Officer**

Juan Hoyos  
District Court Judge

Electronically Signed: 10/20/2022 01:35 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.

**JAMES ANDREW WORKS**

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:

27-CR-22-21091  
**DEFENDANT FACT SHEET**

Filed in District Court  
State of Minnesota  
10/20/2022

**Name:** JAMES ANDREW WORKS  
**DOB:** 05/17/1973  
**Address:** 2340 32nd St E  
#108  
Minneapolis, MN 55406

**Alias Names/DOB:**

**SID:**

**Height:**

**Weight:**

**Eye Color:**

**Hair Color:**

**Gender:** MALE

**Race:** Black

**Fingerprints Required per Statute:** Yes

**Fingerprint match to Criminal History Record:** No

**Driver's License #:**

**SILS Person ID #:** 476683

**SILS Tracking No.** 3268459

**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	6/26/2010	609.342.1(d) Criminal Sexual Conduct-1st Degree-Penetration -Armed w/Danger Weapon	Felony	L2287		MN0271100	10186270
	Definition	6/26/2010	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	L2287		MN0271100	10186270
	Definition	6/26/2010	609.342.2(c) Criminal Sexual Conduct-1st Degree-Subject to conditional release under section 609.3455	No-Level	L2287		MN0271100	10186270
	Penalty	6/26/2010	609.342.2(a) Criminal Sexual Conduct-1st Degree-Penalty-Stat Max	Felony	L2287		MN0271100	10186270
	Penalty	6/26/2010	609.342.2(b) Criminal Sexual Conduct-1st Degree-Penalty-Presumptive 144 mo.	Felony	L2287		MN0271100	10186270
2	Charge	6/26/2010	609.342.1(d) Criminal Sexual Conduct-1st Degree-Penetration -Armed w/Danger Weapon	Felony	L2287		MN0271100	10186270
	Definition	6/26/2010	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	L2287		MN0271100	10186270
	Definition	6/26/2010	609.342.2(c) Criminal Sexual Conduct-1st Degree-Subject to conditional release under section 609.3455	No-Level	L2287		MN0271100	10186270
	Penalty	6/26/2010	609.342.2(b) Criminal Sexual Conduct-1st Degree-Penalty-Presumptive 144 mo.	Felony	L2287		MN0271100	10186270
	Penalty	6/26/2010	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	L2287		MN0271100	10186270
	Penalty	6/26/2010	609.342.2(a) Criminal Sexual Conduct-1st Degree-Penalty-Stat Max	Felony	L2287		MN0271100	10186270
3	Charge	6/26/2010	609.25.1 Kidnapping-Confine/Remove Any Person-No Consent	Felony	K4223		MN0271100	10186270
	Penalty	6/26/2010	609.25.2(1) Kidnapping-Released in Safe Place-No Great Bodily Harm - Sentence	Felony	K4223		MN0271100	10186270
	Penalty	6/26/2010	609.25.2 Kidnapping - Sentence	Felony	K4223		MN0271100	10186270
4	Charge	6/26/2010	609.25.1 Kidnapping-Confine/Remove Any Person-No Consent	Felony	K4223		MN0271100	10186270
	Penalty	6/26/2010	609.25.2(1) Kidnapping-Released in Safe Place-No Great Bodily Harm - Sentence	Felony	K4223		MN0271100	10186270
	Penalty	6/26/2010	609.25.2 Kidnapping - Sentence	Felony	K4223		MN0271100	10186270