

State of Minnesota
County of Rice

District Court
3rd Judicial District

Prosecutor File No. 0660041536
Court File No. 66-CR-17-2939

State of Minnesota,
Plaintiff,

COMPLAINT
Order of Detention

vs.

ANTONIO LEVELL WASHINGTON DOB: 07/02/1984

903 First Ave NW
Faribault, MN 55021

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: Drugs - 1st Degree - Sale - 10 grams or more heroin

Minnesota Statute: 152.021.1(3), with reference to: 152.021.3(e)

Maximum Sentence: up to 30 years prison, or \$1,000,000 fine, or both

Offense Level: Felony

Offense Date (on or about): 11/21/2017 to 11/29/2017

Control #(ICR#): 17001107

Charge Description: On or between November 21, 2017 and November 29, 2017, in Rice County, Minnesota, Antonio Washington did, on one or more occasions within a 90 day period with at least one sale occurring in Rice County, unlawfully sell one or more mixtures containing Heroin with a total weight of 10 grams or more.

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Complainant and/or Signing Officer designated below, declares under penalty of perjury, that he/she has reviewed police reports relating to the above-named Defendant and the allegations contained herein, and/or has spoken with peace officers having knowledge of the incident, and based upon that information, believes the following to be true and correct.

For the last several months the Cannon River Drug and Violent Offender Task Force conducted an investigation into the main source of heroin, an opiate, into Rice County. Through the investigation, the Task Force identified Antonio Levell Washington, DOB: 07/02/1984 (hereinafter the defendant) as the main source of heroin into Rice County.

Agents from the task force, utilizing an undercover agent (hereinafter UC) from the BCA, successfully completed two undercover buys from the defendant in the month of November.

On or about November 21, 2017, agents conducted an undercover buy from the defendant. On that date, the UC was going to buy 10 grams of heroin from the defendant in exchange for \$1500. The buy was supposed to happen at the Flying J near Northfield in Rice County. When the UC arrived at the Flying J, the defendant contacted the UC and changed the buy location to the Wal-Mart parking lot in Lakeville, which is in Dakota County. The UC arrived at the Wal-Mart parking lot and a short time later the defendant arrived. The defendant parked near the UC. The UC went into the defendant's vehicle, they conducted a hand to hand transaction. The UC gave the defendant \$1500 and the defendant gave the UC approximately 10 grams of suspected heroin. The UC exited the vehicle. Both the Defendant and the UC left the parking lot. The UC then turned over the suspected heroin to agents. The suspected heroin tested positive for heroin and weighed 10.23 grams with packaging.

On or about November 29, 2017, agents conducted an undercover buy from the defendant. On that date, the UC was going to buy 12 grams of heroin from the defendant in exchange for \$1800. The buy was arranged to happen at the Flying J near Northfield in Rice County. When the UC arrived at the Flying J, the defendant pulled in almost immediately behind the UC. The UC got into the defendant's SUV. Driving the SUV was Karen Joy Selden DOB: 07/19/1985 (hereinafter the female defendant). The defendant was seated in the front passenger seat. The UC got into the backseat of the defendant's SUV. The exchange of the money and heroin happened over the center console of the vehicle. The female defendant, who drove to the location, watched the entire drug deal occur. The UC provided the defendant with \$1800 and the defendant provided approximately 12 grams of suspected heroin to the UC. The UC, the defendant, and female defendant then exited the SUV. The UC brought the defendant over to the undercover vehicle to look at a TV. The female defendant went into the store to buy cigarettes. At this time, agents moved in and placed the defendant under arrest. Agents entered the Flying J and placed the female defendant under arrest. The UC turned over the suspected heroin to agents. The suspected heroin tested positive for heroin and weighed 12 grams with packaging.

After the arrests, agents searched the SUV, driven by the female defendant, where the drug transaction took place. Agents found the buy money in the center console. Also in the center console was approximately 2 grams of heroin. The heroin was packaged for resale.

Found in possession of the female defendant was a purse. Agents searched the purse. Inside the purse, agents located a large amount of cash totaling \$1,865. Of that money, \$660 was identified by the serial numbers as the government buy money used in the November 21, 2017 drug transaction.

Agents conducted a post *Miranda* interview of the female defendant. During the statement, the female defendant admitted seeing the defendant pull the heroin out of his pocket. The female defendant admitted to seeing the defendant hand the heroin to the UC. The female defendant admitted to seeing the UC hand the defendant the money. The female defendant admitted the money was then placed in the center console. The female defendant admitted to being present at a prior drug transaction involving the defendant.

Combined, the defendant sold over 22 grams of heroin. The female defendant was involved in the sale of over 12 grams of heroin.

Agents knew the residence of the female defendant prior to the transaction. The residence is located in Eagan, Minnesota. Knowing the transaction was to take place and believing the defendant lived there as well, agents were positioned at the residence to see if the defendant left from that residence. Agents watched the defendant and female defendant leave the residence. Agents followed the defendant and female defendant from the residence to the Flying J. The defendant and female defendant never made any stops on the way to the Flying J. Later agents executed a search warrant on the residence known to be where the defendant and female defendant were immediately prior to the drug transaction. During the search, agents found two loaded firearms in the bedroom believed to be occupied by the defendant and female defendant. The guns were found one on each side of the bed. Also located during the search were several more grams of heroin in the bedroom believed occupied by the defendant and female defendant.

PLEASE TAKE NOTICE: Pursuant to Minn. Stat. 609.49., intentional failure to appear for duly scheduled court appearances may result in additional criminal charges, and in addition to any arrest warrant that may otherwise be issued by the Court.

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

Ross Spicer
Patrol Sergeant
118 NW 3rd Street
Faribault, MN 55021
Badge: 1109

Electronically Signed:
11/30/2017 10:59 AM
Rice County, MN

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

Prosecuting Attorney

Brian M Mortenson
218 NW 3rd Street
Faribault, MN 55021
(507) 332-6103

Electronically Signed:
11/30/2017 10:14 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 218 NW 3rd Street, Faribault, MN 55021 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: November 30, 2017.

Judicial Officer

John T Cajacob

Electronically Signed: 11/30/2017 11:21 AM

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

**COUNTY OF RICE
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Antonio Levell Washington

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: Antonio Levell Washington
DOB: 07/02/1984
Address: 903 First Ave NW
Faribault, MN 55021

Alias Names/DOB:

SID: MN02411478

Height:

Weight: 215lbs.

Eye Color:

Hair Color:

Gender:

Race:

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: Yes

Handgun Permit: No

Driver's License #: R838102746419 (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	11/21/2017	152.021.1(3) Drugs - 1st Degree - Sale - 10 grams or more heroin	Felony	DD218		MN0660000	17001107
	Penalty	11/21/2017	152.021.3(e) Drugs - 1st Degree - Sale by Same Person-2/More Counties within 90 Days - Combined Prosecution	Felony	DD218		MN0660000	17001107