

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 16A05408
Court File No. 27-CR-16-12885

State of Minnesota,

Plaintiff,

COMPLAINT

Warrant

vs.

JAWAN CONTRAIL CARROLL DOB: 05/23/1997

1920 BRUNSWICK AVE N
GOLDEN VALLEY, MN 55422

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: Terroristic Threats-Reckless Disregard Risk

Minnesota Statute: 609.713.1, with reference to: 609.229.3(a), 609.713.1, 609.05.1, 609.05.2

Maximum Sentence: 10 YEARS AND/OR \$10,000

Offense Level: Felony

Offense Date (on or about): 01/01/2016

Control #(ICR#): 16166544

Charge Description: That on or between January 1, 2016 and January 8, 2016, in Hennepin County, Minnesota, JAWAN CONTRAIL CARROLL, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another or otherwise procured the other to commit the crime, did threaten to commit a crime of violence with the purpose of terrorizing another, and/or in reckless disregard of the risk of causing terror in another, and did so for the benefit of, at the direction of, in association with or motivated by involvement with a criminal gang, with the intent to promote, further, or assist in criminal conduct by gang members.

COUNT II

Charge: Terroristic Threats-Reckless Disregard Risk

Minnesota Statute: 609.713.1, with reference to: 609.713.1, 609.05.1, 609.05.2

Maximum Sentence: 5 YEARS AND/OR \$10,000

Offense Level: Felony

Offense Date (on or about): 01/01/2016

Control #(ICR#): 16166544

Charge Description: That on or between January 1, 2016 and January 8, 2016, in Hennepin County, Minnesota, JAWAN CONTRAIL CARROLL, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another or otherwise procured the other to commit the crime, did threaten to

commit a crime of violence with the purpose of terrorizing another, and/or in reckless disregard of the risk of causing terror in another.

COUNT III

Charge: Terroristic Threats-Reckless Disregard Risk

Minnesota Statute: 609.713.3(a)(2), with reference to: 609.229.3(a), 609.05.1, 609.05.2, 609.713.3(a)(2)

Maximum Sentence: 5 YEARS AND 1 DAY AND/OR \$3,000

Offense Level: Felony

Offense Date (on or about): 01/01/2016

Control #(ICR#): 16166544

Charge Description: That on or between January 1, 2016 and January 8, 2016, in Hennepin County, Minnesota, JAWAN CONTRAIL CARROLL, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another or otherwise procured the other to commit the crime, displayed, exhibited, brandished, or otherwise employed a replica firearm or a BB gun in a threatening manner, acting in reckless disregard of the risk of causing terror in another, and did so for the benefit of, at the direction of, in association with or motivated by involvement with a criminal gang, with the intent to promote, further, or assist in criminal conduct by gang members.

COUNT IV

Charge: Terroristic Threats-Reckless Disregard Risk

Minnesota Statute: 609.713.3(a)(2), with reference to: 609.05.1, 609.05.2, 609.713.3(a)(2)

Maximum Sentence: 1 YEAR AND 1 DAY AND/OR \$3,000

Offense Level: Felony

Offense Date (on or about): 01/01/2016

Control #(ICR#): 16166544

Charge Description: That on or between January 1, 2016 and January 8, 2016, in Hennepin County, Minnesota, JAWAN CONTRAIL CARROLL, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another or otherwise procured the other to commit the crime, displayed, exhibited, brandished, or otherwise employed a replica firearm or a BB gun in a threatening manner, acting in reckless disregard of the risk of causing terror in another.

COUNT V

Charge: Carry/Possess Pistol w/out Permit - Public Place - Gross Misdemeanor; Second or Subsequent - Felony

Minnesota Statute: 624.714.1a, with reference to: 609.229.3(c), 609.03.2, 624.714.1a

Maximum Sentence: 3 YEARS AND/OR \$15,000

Offense Level: Gross Misdemeanor

Offense Date (on or about): 01/01/2016

Control #(ICR#): 16166544

Charge Description: That on or between January 1, 2016 and January 8, 2016, in Hennepin County, Minnesota, JAWAN CONTRAIL CARROLL held or possessed in a motor vehicle, snowmobile, or boat, or on or about his clothes or person, or otherwise possessed or controlled in a public place or area, a pistol, without first having obtained a permit to carry a pistol, and did so for the benefit of, at the direction of, in association with or motivated by involvement with a criminal gang, with the intent to promote, further, or assist in criminal conduct by gang members.

COUNT VI

Charge: Carry/Possess Pistol w/out Permit - Public Place - Gross Misdemeanor; Second or Subsequent - Felony

Minnesota Statute: 624.714.1a, with reference to: 609.03.2, 624.714.1a

Maximum Sentence: 1 YEAR AND/OR \$3,000

Offense Level: Gross Misdemeanor

Offense Date (on or about): 01/01/2016

Control #(ICR#): 16166544

Charge Description: That on or between January 1, 2016 and January 8, 2016, in Hennepin County, Minnesota, JAWAN CONTRAIL CARROLL held or possessed in a motor vehicle, snowmobile, or boat, or on or about his clothes or person, or otherwise possessed or controlled in a public place or area, a pistol, without first having obtained a permit to carry a pistol.

STATEMENT OF PROBABLE CAUSE

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

Since at least early January 2016, multiple videos have been posted to the internet and social media that are gang related, show gang members possessing firearms, and threatening violence to rival gangs and gang members. Law enforcement officials and lay witnesses believe that these videos contribute to the on-going rivalry and marked escalation of gun related violence between the criminal street gangs.

The Tre Tre is one of the gangs that is making and posting the videos. Law enforcement officials know that the Tre Tre meet the definition of criminal street gang. The Tre Tre are a criminal street gang that mainly operates in north Minneapolis. They make money through robberies, drug sales and illegal activity. They enforce rules through the use and threat of violence, including, but not limited to murders, assaults, shootings, narcotics crimes, robberies, and illegal weapons possession. The Tre Tre have a geographic area that encompasses an area of north Minneapolis centered around 33rd Avenue North. This is where the Tre Tre draws their name from. The Tre Tre have several rivals. One of these rivals is the Skitz Squad. The Tre Tre are also aligned with other gangs and this alliance is referred to as the "highs" or "high end". The Skitz Squad also have an alliance; this is referred to as the "Lows", "Ls" or "Low end". The highs and Lows refer to geographic areas of north Minneapolis where the gangs operate. The Lows operate or control the lower end of north Minneapolis and the Highs control the upper end.

On January 2, 2016, a video was posted using the social media site Snap Chat. This video has been titled "Jawan Vs Jrock 1-2-2016 snap chat video". Jrock is the street name for Defendant Jawan Contrail Carroll. In this video, Co-Defendant Brian Kavell Edwards and Co-Defendant Elijah Khari Edwards are both holding firearms. One of the guns appears to be a Ruger P89. Co-Defendant Dayshane Antonio Cochran also holds what appears to be firearm; a revolver.

On January 8, 2016, a video entitled "Fed Up x Lijah Loc x Bj Lord" was posted online. The video shows Co-Defendant Dayshane Antonio Cochran, Co-Defendant Brian Kavell Edwards and Co-Defendant Elijah Khari Edwards in the same or similar clothing to the January 2 snap chat video. "Fed Up x Lijah Loc x Bj Lord" appears to have been filmed largely in and around 1001 North Seventh Street in Minneapolis, Hennepin County, Minnesota. In "Fed Up x Lijah Loc x Bj Lord" known Tre Tre members and associates, including but not limited to Co-Defendant Dayshane Antonio Cochran, Defendant Jawan Contrail Carroll, Co-Defendant Brian Kavell Edwards and Co-Defendant Elijah Khari Edwards, are filmed holding, pointing and displaying what appear to be firearms. One of the firearms appears to be a Ruger P89 and a second appears to be the same revolver that Co-Defendant Dayshane Antonio Cochran possessed in the January 2nd snap chat video. Co-Defendant Dayshane Antonio Cochran, and others in the "Fed Up x Lijah Loc x Bj Lord" video also display the Tre Tre hand sign.

The "Fed Up" video also shows the front door of 2954 Dupont Avenue North in Minneapolis, Minnesota. This is significant in that on September 19, 2011, Juwon Osborne was killed at this address. Osborne had the street name of "Skitz". This Skitz Squad is named after Osborne.

The audio in this "Fed Up" video are gang related and contains explicit threats of violence toward the rival gangs. In this audio, those recorded tell the listeners:

1. "You ain't hit squad; you ain't doing no hit squad. Fuck the Skitz Squad; nigga ya'all some skid marks." (Law enforcement officers know that calling members of the Skitz Squad "skid marks" is meant to demean members of the Skitz Squad.)

2. "You all look down on me; Beretta knock you head off." (Law enforcement officers know that a Beretta is a brand of firearm. The term "knock your head off" is meant to threaten death with the Beretta.)

3. "Ya'all better get your lead up; Haji stop that rat beefing; (inaudible) make it clap season; when I up that pole it ain't no (inaudible) stop breathing; hood nigga your aim off; come holler at me when your shots decent; I'm pulling up on that A-block; and my shot (inaudible)" (Law enforcement officers know that the term "get your lead up" is meant to mean arm yourself. The term "clap" is a term used to describe the discharge of a firearm. The term "pole" is a term used to describe a firearm. Haji is likely O.C.W. (6/7/1996), a rival Skitz Squad member. "A-Block" is a term that is used to describe Aldrich Avenue North in Minneapolis. O.C.W. reports his address as 4XXX Aldrich Avenue North in three 2016 Minneapolis police reports.)

4. "Fuck a Skitz Squad; 30 to a hit squad (this is said as Co-Defendant Brian Kavell Edwards is holding a firearm with an extended magazine); don't like to miss shit; bitch I don't shoot from distance; boy I get on your ass; and no line up for missing. Eat the lead up, eat the lead up. I got my Glock and Lijah Loc got the Beretta. Shots to your face..." (Law enforcement officers know that the term "30" refers to the extended magazine on the Ruger P89 Co-Defendant Brian Kavell Edwards is holding. "Lijah Loc" is a street name for Co-Defendant Elijah Khari Edwards. The term "Loc" is a term used to describe a member of a Crip affiliated gang.)

5. "You little niggas need to really need to stop; so when I catch nigga; Glock put you to rest nigga; 29- duce six, don't be on them blocks nigga (this is said as the address "2954" is shown); Golden Valley; don't get caught in the (inaudible); blue and red- they on every block; (inaudible) we got us a dead opp." (Law enforcement officers know that the address "2954" is significant as Juan "Skitz" Osborne was murdered at this address. Blue is a color associated with Crip affiliated gangs. Red is associated with Vice Lord affiliated gangs. Co-Defendant Elijah Khari Edwards uses the street name of "Lijah Loc" and Co-Defendant Brian Kavell Edwards uses "BJ Lord". The term "Loc" and "Lord" are terms used to describe Crip and Vice Lord gang affiliated members. The term "opp" is a term used to describe the opposition, in this case the Skitz Squad criminal street gang.)

On January 8, 2016, law enforcement officials were conducting simultaneous surveillance of social media and the address 1001 North Seventh Street, Minneapolis, Hennepin County, Minnesota. Officers received information that the Tre Tre gang members and associates had gathered at the location to film a video, "Fed Up x Lijah Loc x Bj Lord", and were in possession of firearms. Officers observed Co-Defendant Brian Kavell Edwards and Romelle Edwards arrive in a vehicle, and enter the residence. Shortly after, officers observed that a video entitled "Facebook BJ Lord" was posted to social media. Officers recognized Co-Defendant Brian Kavell Edwards, Romelle Edwards and their mother in the video. In the "Facebook BJ Lord" video, Co-Defendant Brian Kavell Edwards stated that he has two firearms and notes that he is being driven to north Minneapolis.

Officers observed multiple individuals exit the residence, and enter two vehicles. Officers stopped the vehicles. Co-Defendant Brian Kavell Edwards and Co-Defendant Elijah Khari Edwards were in one vehicle. Defendant Jawan Contrail Carroll was the front seat passenger in the second vehicle. Officers recovered a handgun from Defendant Jawan Contrail Carroll's pocket, and a handgun from under the front passenger seat. The handgun in Defendant Jawan Contrail Carroll's pocket was a Ruger, and appears to be the same firearm that is displayed in the "Jawan Vs Jrock snap chat video" from January 1, 2016 and the "Fed Up x Lijah Loc x Bj Lord" video on January 8, 2016.

Defendant Jawan Contrail Carroll is not a police officer, and does not have a permit to carry a pistol in public.

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

John Biederman
Sergeant
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 0548

Electronically Signed:
05/13/2016 03:34 PM
Hennepin County, Minnesota

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

Prosecuting Attorney

Vicki Vial-Taylor
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
05/13/2016 03:32 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: \$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: May 13, 2016.

Judicial Officer

Bev Benson
Judge

Electronically Signed: 05/13/2016 04:37 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.

JAWAN CONTRAIL CARROLL

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: