

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 17A03259
Court File No. 27-CR-17-6558

State of Minnesota,

Plaintiff,

vs.

MARVIN WASHINGTON JR DOB: 10/25/1966

1010 CURRIE
Minneapolis, MN 55403

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: Murder - 2nd Degree - With Intent-Not Premeditated

Minnesota Statute: 609.19.1(1), with reference to: 609.19.1(1), 609.05.1, 609.05.2

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 10/03/2013

Control #(ICR#): 13327829

Charge Description: That between October 3, 2013 and October 4, 2013, in Hennepin County, Minnesota, MARVIN WASHINGTON Jr, while acting alone or by aiding and abetting another, caused the death of victim, a human being, with intent to effect the death of that person or another, but without premeditation.

STATEMENT OF PROBABLE CAUSE

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

That on October 4, 2013, at approximately 8:04 a.m., officers were dispatched to the area of 2633 Nicollet Avenue South in Minneapolis, Hennepin County, Minnesota, to investigate a report that a body had been discovered behind businesses near this address. Upon arrival, officers spoke with citizens who reported they came across a body while "scrapping" in the dumpsters. Officers observed a body lying on the ground by a dumpster. The body was that of an adult male. The adult male was deceased, unclothed, and had obvious signs of head trauma. During a subsequent autopsy, the medical examiner determined the cause of death was blunt force injury and the manner of death was ruled a homicide. An identification of the body was made to a known adult male, hereafter victim.

Officers learned victim and another identified adult male had a documented police contact the previous day (October 3, 2013 at 4:22 p.m.) for public consumption. Officers located this other adult male and confirmed he was with victim on October 3, 2013. This male reported he and victim parted ways after the police encounter and victim was not with anyone else at the time.

Officers located video surveillance cameras positioned on businesses in the area and secured video footage. Some of these cameras recorded activities near the location where victim's body was discovered. An analysis of relevant cameras showed that on October 4, 2013, at approximately 1:29 a.m., two individuals can be seen pushing a garbage can in the area.

Thereafter, no further leads surfaced.

In February 2017, officers received communication from a citizen indicating they had knowledge of the murder. This communication indicated the person responsible was MARVIN WASHINGTON, JR., hereafter defendant, identified a number of witnesses who were present during the murder, and indicated the murder occurred at an apartment located on the 2600 block of 2nd Avenue South in Minneapolis, Hennepin County, Minnesota. Officers learned the identity of these witnesses and interviewed them.

Officers spoke with an identified adult female, hereafter Witness #1. Witness #1 reported the murder was committed by defendant in an apartment at 2640 2nd Avenue South. Witness #1 reported that on the evening of October 3, 2013, she was with defendant and two other adult males, hereafter Witness #2 and Witness #3. Witness #1 reported they were walking to a liquor store when they came across victim near the 2200 block of 1st Avenue South. Witness #1 reported victim joined the group and they all went back to Witness #2's apartment which she indicated was located at 2640 2nd Avenue South, apartment #17. Once inside the apartment, victim consumed crack cocaine belonging to defendant. Victim did not have money to pay for the crack cocaine. Witness #1 reported defendant demanded payment for the drugs and victim provided his EBT card. Witness #1 reported they checked victim's EBT card balance (via a telephone call) but learned victim did not have an available balance. Witness #1 reported defendant became enraged and began beating victim. Witness #1 reported defendant repeatedly punched and kicked victim in the head and body. Witness #1 indicated Witness #3 had left the apartment prior to the beating. Witness #1 reported defendant beat victim unconscious and, while victim was lying motionless on the apartment floor, shoved a broomstick up victim's anus. Witness #1 reported defendant then left the apartment, leaving her and Witness #2 with the victim. Witness #1 reported defendant returned to the apartment later that evening with another adult male, hereafter Witness #4, and a garbage can. Witness #1 reported defendant removed victim's clothing, placed his body inside the garbage can, and left with it and Witness #4. Witness #1 was shown confirmatory photographs of defendant and the other witnesses and identified each involved

person.

Officers went to 2640 2nd Avenue South and spoke with building management. Officers confirmed Witness #2 was the tenant of apartment #17 at the time of the murder but had since moved out of the apartment. Officers learned the apartment's floor coverings had been changed and the walls had been painted since the date of the murder. Nonetheless, the Crime Lab processed the apartment for possible evidence.

Officers located and spoke with Witness #2. Witness #2 confirmed he resided at the above-listed apartment at the time of the murder. Witness #2 corroborated the account of Witness #1, indicating they met victim on the street and returned to his (Witness #2's) apartment. Witness #2 also confirmed defendant beat victim to death after victim consumed all of the crack cocaine. Witness #2 confirmed defendant inserted a broomstick into victim's anus after victim was unconscious and that defendant left the apartment but returned with Witness #4 and a garbage can. Witness #2 confirmed defendant removed victim's body from the apartment via the garbage can.

Officers located and spoke with Witness #4. Witness #4 reported he was contacted by defendant during the evening of October 3, 2013. Defendant informed Witness #4 that he "messed up and killed a man." Defendant also informed Witness #4 that he killed the man because the man consumed all of their drugs and did not have money to pay for them. Witness #4 reported he was present in the apartment when defendant placed victim's body into the garbage can and pushed it outside. Witness #4 showed officers on a map the path defendant pushed the garbage can before disposing of the body. Witness #4 was shown still images from the above-listed surveillance cameras and identified himself and defendant as the individuals pushing the garbage can.

Officers also spoke with an identified female, hereafter Witness #5. Witness #5 reported defendant spoke to her after the incident, admitted his involvement in the murder, and admitted victim's body was placed inside a garbage can and deposited elsewhere.

Officers confirmed that on October 3, 2013, at 5:14 p.m., an identified telephone number was used to inquire into victim's EBT card balance. This number has been linked to Witness #2.

Officers located and arrested defendant. During a post-Miranda interview, defendant denied involvement in the murder.

At present, 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

Chris Karakostas
Sgt
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 3636

Electronically Signed:
03/16/2017 09:00 AM
Hennepin County, Minnesota

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

Prosecuting Attorney

Darren Borg
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
03/16/2017 08:08 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: \$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: March 16, 2017.

Judicial Officer

Hilary Caligiuri
District Court Judge

Electronically Signed: 03/16/2017 09:13 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.

MARVIN WASHINGTON Jr

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: