STATE OF MINNESOTA
COUNTY OF DAKOTA

DISTRICT COURT
FIRST JUDICIAL DISTRICT

COURT FILE NO. _19HA-CR-12-129__
COUNTY ATTORNEY FILE NO. CA-12-0065
CONTROLLING AGENCY: MN0190100
CONTROL NUMBER: 12000226

State of Minnesota,

Plaintiff,

[ ] SUMMONS
[ ] WARRANT
[ ] ORDER OF DETENTION
[X] AMENDED

v.

JAVED MOOKHTR MOBIN
12850 W Frontage Rd – Room 209
Burnsville MN 55337
DOB: 11-30-92

Defendant.

COMPLAINT

The Complainant, being duly sworn, makes complaint to the above-named Court and states that there is probable cause to believe that the Defendant committed the following offense(s):

COUNT I

SOLICITATION OF PROSTITUTION
M.S. § 609.322, subd. 1a(2); 609.101
0-15 years and/or $12,000 - $40,000
MOC: Z1180 GOC: N
[X] Felony [ ] Gross Misdemeanor [ ] Misdemeanor [ ] Petty Misdemeanor

That on or about January 11, 2012, in Dakota County, Minnesota, JAVED MOOKHTR MOBIN, while acting other than as a prostitute or patron, did intentionally promote the prostitution of an individual.

COUNT II

DOMESTIC ASSAULT BY STRANGULATION
M.S. § 609.2247, subd. 2; 609.101
0-3 years and/or $1,500 - $5,000
MOC: AN051 GOC: N
[X] Felony [ ] Gross Misdemeanor [ ] Misdemeanor [ ] Petty Misdemeanor

That on or about January 1, 2012 through January 11, 2012, in Dakota County, Minnesota, JAVED MOOKHTR MOBIN did assault a family or household member by strangulation, i.e., intentionally impeded normal breathing or circulation of the blood by applying pressure on the throat or neck or by blocking the nose or mouth of another person.

COUNT III

SOLICITATION OF PROSTITUTION
M.S. § 609.322, subd. 1a(1); 609.101
0-15 years and/or $12,000 - $40,000
MOC: Z1180 GOC: N
[X] Felony [ ] Gross Misdemeanor [ ] Misdemeanor [ ] Petty Misdemeanor

That on or about January 11, 2012, in Dakota County, Minnesota, JAVED MOOKHTR MOBIN, did solicit or induce an individual to practice prostitution.

COUNT IV

SOLICITATION OF PROSTITUTION
M.S. § 609.322, subd. 1a(3); 609.101
0-15 years and/or $12,000 - $40,000
MOC: Z1180 GOC: N
[X] Felony [ ] Gross Misdemeanor [ ] Misdemeanor [ ] Petty Misdemeanor

That on or about January 11, 2012, in Dakota County, Minnesota, JAVED MOOKHTR MOBIN, did receive profit, knowing or having reason to know that it is derived from the prostitution, or the promotion of the prostitution.

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Your Complainant is a police officer with the Burnsville Police Department. In that capacity I have reviewed the police reports and believe the following to be true.

On January 11, 2012, officers arrested a female victim A.T., for prostitution at a hotel in the City of Burnsville, Dakota County, Minnesota. The victim reported that she was forced to become a prostitute by Javed Mookhtr Mobin, date of birth: 11/30/1992, and that Mobin had assaulted her in the past and told her she cannot leave him.

The officers sought to arrest the victim for prostitution after observing recent ads on Backpages.com which advertised the victim under the escort section, which the officers know from their training and experience to be a website commonly used to view or post ads for prostitution. The officers were concerned for the victim's safety because in the pictures of her that were posted to the ads, she appeared to be pregnant and under the influence of illegal drugs. Further, the officers have had previous contact with the victim and Mobin, and were aware of Mobin's violent history towards the victim.

On January 11, 2012, an officer conducting guest registry checks at a hotel in the City of Burnsville discovered that the victim was the registered occupant of room 209. The front desk employee told the officer that the victim was with a male in the room. On the same day an undercover officer contacted the phone number posted to the Backpages ad promoting the victim as an "escort", numerous times but was unable to get through. The phone number was run through an in-house law enforcement database and came back as registered to Mobin. At approximately 6:41 p.m. that same day, the undercover officer received a phone call from the number registered to Mobin. A female, later determined to be the victim, asked if someone had

called from this number. The officer asked the victim if she was the individual advertised on the Backpages ad, and she confirmed that she was. The victim told the officer that her "donation" would be $250.00 for an hour and $150.00 for a half an hour. The officer told the victim he would like a half hour. The victim told the officer to start heading towards Burnsville and she would text the officer the address. The officer subsequently received a text from Mobin's phone with the address of the hotel where the victim was a registered occupant.

At approximately 7:11 p.m., the officer called Mobin's phone and told the victim that he was pulling into the parking lot. The officer asked the victim if she was ok using his condoms, and she said she was. The victim told the officer to go to a side door where she would meet him shortly. At 7:16 p.m., the officer called Mobin's phone as the victim had still not come to the door. The officer then observed a male exit the hotel and walk past him. The officer recognized the male as Mobin from a past contact and from recently viewing his driver's license photo. As Mobin walked past the officer, the officer could hear a phone ringing as he was still trying to call the victim. No one answered the phone which confirmed the officer's suspicion that Mobin was working as a pimp for the victim. The officer called the phone again and the phone was answered. The officer heard severe wind blowing into the phone. On this evening, it was extremely cold out with high winds. The officer looked around the corner and observed Mobin standing near the trees between the hotel and a gas station.

A minute or so later the victim came down the stairs wearing no shoes or socks and a low cut t-shirt. The officer asked the victim if she was the female in the ad, and she confirmed she was. The officer then informed the victim that he was a police officer and placed her under arrest.

Officers then located Mobin sitting on the stairs near the side entrance and asked him if he was staying at the hotel with the victim. Mobin denied knowing the victim and was unable to explain why he was at the hotel. Mobin was placed under arrest and searched. Officers located $565.00 in cash on Mobin's person as well as three cell phones. The officer called the number registered to Mobin that was used to set up the sexual encounter with the victim, and one of the three phones began to ring.

After being arrested, the victim reported that Mobin "strangled" her four to five days prior, after Mobin grew angry with her because of the way she was answering questions. Mobin slapped her on the left side of her face which caused her to hit her head against the wall. A struggle ensued, at which point Mobin pushed the victim onto the bed and began to choke her by squeezing her neck with both hands. The victim stated that she was unable to breathe and felt as though she was going to pass out. Mobin told the victim that he stopped choking her when he saw that her face was turning blue. The victim reported that her voice was raspy after the incident. The officer observed a bruise on the victim's right shoulder, scratch marks and bruising on her upper chest and a scratch on her neck.

In July of 2011, officers spoke to Mobin's mother, who called the police to report that Mobin is very physically abusive toward the victim. Mobin's mother reported that the victim had black eyes and a concussion and she was concerned for the victim's well-being. At that time, officers located the victim and Mobin and observed that the victim had a black eye.

The victim stated that Mobin has been prostituting her since July of 2011 and that all monetary compensation goes to Mobin from the prostitution. She stated that Mobin is physically abusive to her and she is in fear of him. The victim stated that Mobin placed the ad of her on Backpage.com for the purpose of prostituting her. The victim stated that she is seven months

pregnant with Mobin's child. The victim reported that Mobin has threatened to kill her on numerous occasions if she ever hid money from him, went to the police or did "business" behind his back. The victim stated that Mobin has drugged her in the past by placing sleeping pills in her drinks. The victim stated that she feels as though she is a slave to Mobin and Mobin rarely lets her speak with her family. The victim reported that she was recently in the hospital for a vaginal infection which she believed was from having sexual intercourse without a condom on several occasions. The victim was afraid to turn away a customer just because they did not have a condom because Mobin would get angry over missed money.

NOTICE: You must appear for every court hearing on this charge. A failure to appear for court on this charge is a criminal offense and may be punished as provided in Minn. Stat. §609.49.

Complainant requests that Defendant, JAVED MOOKHTR MOBIN, 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'S NAME

_____

COMPLAINANT'S SIGNATURE

_____

Subscribed and sworn to before the undersigned this _____ day of _____, 2012.

NOTARY STAMP:

SIGNATURE

_____
Notary Public

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

Date: _____(rac)

PROSECUTING ATTORNEY SIGNATURE:

_____
Name: Tricia A. Loehr
Assistant Dakota County Attorney
Dakota County Judicial Center
1560 Highway 55
Hastings MN 55033
(651) 438-4438
Attorney Registration No.: 0388027

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.

[ ] SUMMONS

THEREFORE YOU, THE ABOVE-NAMED DEFENDANT, ARE HEREBY SUMMONED to appear on the date stated on the attached Notice of Hearing before the above-named court at Dakota County Judicial Center, 1560 Highway 55, Hastings, Minnesota, 55033 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 hereby order, in the name of the State of Minnesota, that the above-named Defendant be apprehended and arrested without delay and brought promptly before the above-named 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 MN and Border States

[X] ORDER OF DETENTION

Since the above-named Defendant is already in custody, I hereby order, subject to bail or conditions of release, that the above-named Defendant continue to be detained pending further proceedings.

Bail: $
Conditions of Release:

This complaint, duly subscribed and sworn to, issued by the undersigned Judicial Officer this
_13__ day of _____January_____, 2012.

JUDICIAL OFFICER:
NAME:

TITLE: JUDGE OF DISTRICT COURT

SIGNATURE:

/s/_____
Judge

COUNTY OF DAKOTA
STATE OF MINNESOTA

STATE OF MINNESOTA
Plaintiff,

vs.

JAVED MOOKHTR MOBIN
Defendant.

Clerk's Signature or File Stamp

RETURN OF SERVICE
I hereby Certify and Return that I have served a copy of this COMPLAINT upon the Defendant herein named.

Signature of Authorized Service Agent:

_____