

State of Minnesota  
County of DakotaDistrict Court  
1st Judicial DistrictProsecutor File No. CA-2024-01688  
Court File No. 19HA-CR-24-1543

State of Minnesota,

Plaintiff,

vs.

JA'JUAN ISAAH THOMAS DOB: 10/15/1999

236 Central Avenue  
Bayport, MN 55003

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: Controlled Substance Crime in the 1st Degree (Sale) (Heroin or Fentanyl) (10 or More Grams or 40 or More Dosage Units)**

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

Maximum Sentence: 0-30 Years and/or \$300,000.00 - \$1,000,000.00

Offense Level: Felony

Offense Date (on or about): 08/03/2024 to 08/03/2024

Control #(ICR#): 24003745

Charge Description: On or about August 3, 2024, in the County of Dakota, Minnesota, JA'JUAN ISAAH THOMAS, did on one or more occasions within a 90-day period unlawfully sell one or more mixtures of a total weight of ten grams or more, or 40 dosage units or more, containing heroin or fentanyl.

**COUNT II****Charge: Controlled Substance Crime in the 1st Degree (Possession) (Heroin or Fentanyl) (25 or More Grams or 100 or More Dosage Units)**

Minnesota Statute: 152.021.2(a)(3), with reference to: 152.021.3(a)

Maximum Sentence: 0-30 Years and/or \$300,000.00 - \$1,000,000.00

Offense Level: Felony

Offense Date (on or about): 08/03/2024 to 08/03/2024

Control #(ICR#): 24003745

Charge Description: On or about August 3, 2024, in the County of Dakota, Minnesota, JA'JUAN ISAAH THOMAS, did unlawfully possess one or more mixtures of a total weight of 25 grams or more or 100 dosage units or more, containing heroin or fentanyl.

On August 3, 2024, at approximately 7:07 a.m., officers with the Burnsville Police Department responded to Portland Avenue and 143rd Street East, Burnsville, Dakota County, Minnesota, for a suspicion call. Dispatched advised that there was someone observed inside a vehicle, possible with metal foil.

Upon arrival, an officer parked behind the vehicle, exited his squad vehicle, and walked up to the vehicle. When doing so, the officer noticed a rolled dollar bill and some powder of the male's lap, who was sitting in the front passenger seat. The officer also noticed a baggie hanging out of his sweatshirt pocket and metal foil near the male's feet.

The officer knocked on the vehicle's window and told the male, later identified as JA'JUAN ISIAH THOMAS (DOB: 10/15/1999), to exit. The officer then opened the vehicle's door and told THOMAS to exit. The officer grabbed THOMAS's wrist and instructed him to exit. THOMAS resisted. An assisting officer assisting in gaining control of THOMAS. Once outside the vehicle, THOMAS continued to struggle with the officers. While going to the ground, an officer saw a bag fall from THOMAS's person and onto the ground. The bag contained pills. In addition, officer also located \$4,770 in U.S. currency on THOMAS's person.

Following his arrest, THOMAS was able to slip out of one of his handcuffs and tried to run. Officers were able to regain custody of THOMAS.

Later, THOMAS advised that his name was Jacoby Chevell Dixon, with a date of birth of January 21, 1998.

During a search of the vehicle, officers located additional pills.

In total, officers collected approximately 1,501 small, blue pills. The pills contained the markings of "M30", indicative of counterfeit Oxycodone pills that commonly contain fentanyl, a Schedule II controlled substance. One of the pills later field tested positive for the presence of fentanyl.

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**

Colin Warnemunde  
Police Officer  
100 Civic Center Parkway  
Burnsville, MN 55337-3867  
Badge: 45162

Electronically Signed:  
08/06/2024 09:22 AM  
Dakota County, Minnesota

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

**Prosecuting Attorney**

Christopher A. Zielinski  
1560 Hwy 55  
Hastings, MN 55033-2392  
(651) 438-4438

Electronically Signed:  
08/06/2024 09:15 AM

MINNESOTA  
JUDICIAL  
BRANCH

**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: \$

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: August 6, 2024.

Judicial Officer

Krista Marks  
Judge

Electronically Signed: 08/06/2024 09:43 AM

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

COUNTY OF DAKOTA  
STATE OF MINNESOTA

**State of Minnesota**

Plaintiff

vs.

**Ja'Juan Isaiah Thomas**

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: