

State of Minnesota
County of Blue Earth

District Court
5th Judicial District

Prosecutor File No.
Court File No.

MAN-16-0493-02
07-CR-16-2485

State of Minnesota,

Plaintiff,

vs.

JACQUELINE ANN BATSON DOB: 07/25/1964

200 Willard St #201
Mankato, MN 56001

Defendant.

COMPLAINT

Summons

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: Disorderly Conduct-Brawling or Fighting

Minnesota Statute: 609.72.1(1)

Maximum Sentence: 90 days and/or \$1,000

Offense Level: Misdemeanor

Offense Date (on or about): 05/28/2016

Control #(ICR#): 16015814

Charge Description: Said Defendant, Jacqueline Ann Batson, did in a public or private place, knowing, or having reasonable grounds to know that it will, or will tend to, alarm, anger or disturb others or provoke an assault or breach of the peace, engaged in brawling or fighting.

STATEMENT OF PROBABLE CAUSE

Complainant is an Officer with the Mankato Police Department who believes the information set out below is true and accurate based on reports and information submitted to the Officer by Officer Jessica Ellis and others identified herein.

On May 28, 2016, at approximately 10:15 p.m., officers were dispatched to a disturbance that occurred at the 200 block of Willard Street in the City of Mankato, County of Blue Earth, State of Minnesota. Officers were dispatched to the Law Enforcement Center where a male, later identified as Jason Allen Hubbard, Defendant Hubbard herein was at the Law Enforcement Center and called from the lobby phone. Girlfriend of Defendant Hubbard, Witness 1, was waiting in the lobby as well.

Officer Ellis arrived and spoke with Witness 1 about the incident. Witness 1 advised that her vehicle window was smashed out by a group of people. Officer Ellis noted that Witness 1 was bleeding from her cheek and covered in glass. Witness 1 stated she's known Defendant Hubbard for a very long time and arrived to Mankato with her son to celebrate Defendant's Hubbard's family carnival at Madison East Mall. Witness 1 was unaware of events that transpired the evening prior to her contact with Defendant Hubbard on May 28, 2016, but on May 28, 2016 Defendant Hubbard asked Witness 1 to drive him to a residence so he could speak with the mother of another child to whom Defendant believed assaulted his son.

Witness 1 was provided direction to a residence; and upon arrival, Defendant Hubbard exited the vehicle. Defendant Hubbard came running back to the vehicle a few minutes later and said to Witness 1, "Let's go, let's go!" Witness 1 then observed several people of various ages banging and pounding on her vehicle. The driver's side window of Witness 1's vehicle was struck and broken into; and glass was sprayed into the vehicle, cutting Witness 1's face. Witness 1 stated that she drove carefully out of the area because she did not want to hit anyone who was pounding on the vehicle; however, the suspects that were damaging her vehicle continued to follow the vehicle down the block. Witness 1's infant son was located in the back seat at the time of incident, but was uninjured. Witness 1 stated that if she knew what was going to happen, she would have never taken Defendant Hubbard to the person's residence. Photographs of Witness 1, the vehicle, and Defendant Hubbard were taken and placed into evidence. Witness 1 felt scared and threatened by all of approximately five people that were hitting and kicking her vehicle.

Contact was made with Defendant Hubbard by Officer Grassmann of Mankato police. Defendant Hubbard was very excited in nature, spoke fast, flailed his arms, paced back and forth, and explained the situation to Officer Grassmann. It should be noted that Officer Terry was able to record information with Defendant Hubbard regarding the incident on his squad video/audio. Defendant Hubbard stated to Officer Grassmann that his son was at a residence on Willard Street with Witness 2 the previous evening. Defendant Hubbard stated that his son was assaulted/beaten up by some of the individuals at a residence the previous evening. Upon knowledge of this information, the Defendant found out where the alleged assaulter lived and proceeded to his residence. The alleged assaulter is hereinafter known as Suspect 1. After a confrontation ensued on May 28, 2016 at the residence where Suspect 1 was located, Defendant Hubbard retreated back to his vehicle where Witness 1 was in the driver's seat. At that point, a group of people surrounded the vehicle, began hitting the car with objects, and broke the driver's side window. Defendant Hubbard and Witness 1 drove away from the scene and proceeded to the Public Safety Center. After gathering more information from Defendant Hubbard and Witness 1, officers proceeded to the address on Willard Street to make contact with the other people associated in the event.

Upon arrival by Officer Grassmann, Officer Terry, and Officer Ellis of Mankato Police, officers met with various individuals involved in the incident. Officer Terry spoke with a female, later identified as Jacqueline Ann Batson, Defendant Batson herein. Defendant Batson indicated she was located inside the residence

and was not a witness to the initial confrontation between her sons and Defendant Hubbard, as she was located in the bathroom. Defendant Batson stated her sons went outside to confront Defendant Hubbard, and Defendant Batson chased after them. Defendant Batson stated that Defendant Hubbard attempted to hit her son, Suspect 2, and that Defendant Batson's other son, Suspect 1, broke the window on the vehicle driven by Witness 1. Defendant Batson stated she did not touch the car driven by Witness 1.

Officer Grassmann spoke with Suspect 1, who admitted to being involved in a verbal altercation and admitted to breaking the window of the vehicle after Defendant Hubbard attempted to punch Suspect 2 in the face. Suspect 1 admitted to kicking Defendant Hubbard's son in the chest to get him to calm down and stop his actions inside the residence on the previous evening. Suspect 1 also admitted to using swear words and profanity when confronting Defendant Hubbard. Suspect 1 stated that Defendant Hubbard attempted to punch Suspect 2 in the face from within the vehicle. Suspect 1 admitted to kicking the vehicle a few times and punched the driver's side window, which caused it to break. Suspect 2 indicated the same information to Officer Grassmann as presented by Suspect 1 and admitted to going outside with Suspect 1 to confront Defendant Hubbard.

Officer Ellis spoke with another party at the residence, who wished to remain anonymous due to fear of retaliation. This person will be hereinafter known as Anon. Anon observed a vehicle pull up into the street and noticed Defendant Hubbard exit the driver's seat and approach the apartment complex. Anon could hear a lot of yelling and screaming coming from Apartment 201. A few minutes passed, and Anon noted that Defendant Hubbard was seen entering the vehicle again and saw approximately five people ranging in age from pre-teen to adult banging and kicking the vehicle. Anon observed one of the males punching the window and shattering it. Anon stated that Defendant Hubbard, not Witness 1, started to drive away from the area and that the group of people continued to follow and yell in a threatening manner. Anon advised that he had recorded the video and thereafter played the video for Officer Ellis. Officer Ellis noted the vehicle was pretty dark in the video, but was able to identify a vehicle parked in the roadway and several people around the vehicle. Officer Ellis noted the video is clear enough that one can hear the window break and other damage being done to the car as well as various people yelling. The aforementioned video was downloaded and placed onto a DVD by Officer Terry for evidence purposes. After further review of the video, Officer Ellis noted that Suspect 2 can be heard shouting, "I'm going to kill you," along with other non-yelling. Defendant Hubbard is seen entering the driver's seat and drove out of the area with the group of people following and yelling. Officer Ellis noted that Defendant Batson was obviously intoxicated while she spoke to Officer Terry and Officer Grassmann. Her speech was slurred and had an unsteady gait. Defendant Batson stated that even though five people were located inside her apartment on the date of incident, only three people were present when the disturbance occurred; including herself and her two children, Suspect 1 and Suspect 2.

All criminal charges were assessed through Letters of Transmittal to the Blue Earth County Attorney's Office based on the gross misdemeanor charge of Criminal Damage to Property and misdemeanor charges to juvenile males.

Defendant Hubbard was convicted of Felony Domestic Assault in 2015 (70-CR-15-19719) and Misdemeanor Domestic Assault in 2013 (70-CR13-16373). Defendant Hubbard currently has six pending cases (one felony and five misdemeanor pending dispositions)(27-VB-15-271215205704; 07-CR-16-347; 02-VB-16-2191; 07-CR-16-659; 07-CR-16-791; and 07-VB-16-2553)

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

Daniel Schisel
Police Commander
710 S Front St
Mankato, MN 56001-3803
Badge: 3135

Electronically Signed:
06/17/2016 08:54 AM
Blue Earth County, Minnesota

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

Prosecuting Attorney

Nicholas Boulieris
Assistant County Attorney
401 Carver Road
PO Box 3129
Mankato, MN 56002-3129
(507) 304-4600

Electronically Signed:
06/15/2016 10:59 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 **July 14, 2016 at 8:15 AM** before the above-named court at 401 Carver Rd, Mankato, MN 56002-0347 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: June 17, 2016.

Judicial Officer

Bradley C Walker
District Court Judge

Electronically Signed: 06/17/2016 09:50 AM

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

**COUNTY OF BLUE EARTH
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

JACQUELINE ANN BATSON

Defendant

LAW ENFORCEMENT OFFICER RETURN OF SERVICE
*I hereby Certify and Return that I have served a copy of this
Summons upon the Defendant herein named.*

Signature of Authorized Service Agent: