

State of Minnesota  
County of Blue Earth

District Court  
5th Judicial District

Prosecutor File No. 0070112293  
Court File No. 07-CR-25-4836

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**State of Minnesota,**

Plaintiff,

vs.

**JHOEL CHRISTOFFE DILLON DOB: 10/13/2006**

132 Panther Lane  
Mankato, MN 56001

Defendant.

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**COMPLAINT**

Summons

Amended

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: Aid and Abet Assault-2nd Degree-Dangerous Weapon**

Minnesota Statute: 609.222.1, with reference to: 609.05.1

Maximum Sentence: 7 years or \$14,000 fine or both.

Offense Level: Felony

Offense Date (on or about): 11/28/2025

Control #(ICR#): 25034237

Charge Description: On or about November 28, 2025, in the County of Blue Earth, Minnesota, Jhoel Christoffe Dillon, did intentionally aid, advise, hire, counsel or conspire with or otherwise procure another to commit the crime; to wit: did assault another with a dangerous weapon; to wit, a firearm or a BB gun.

**COUNT II**

**Charge: Aid and Abet Threats of Violence-Reckless Disregard Risk**

Minnesota Statute: 609.713.1, with reference to: 609.05.1

Maximum Sentence: 5 years or \$10,000 fine, or both

Offense Level: Felony

Offense Date (on or about): 11/28/2025

Control #(ICR#): 25034237

Charge Description: On or about November 28, 2025, in the County of Blue Earth, Minnesota, Jhoel Christoffe Dillon, did intentionally aid, advise, hire, counsel, or conspire with, or otherwise procure another to commit the crime, and/or did personally commit said crime; to wit: did , threaten, directly or indirectly, to commit any crime of violence with purpose to terrorize another, or in a reckless disregard of the risk of causing such terror.

**COUNT III**

**Charge: Aid and Abet Threats of Violence-Cause or Attempt Cause Terror**

Minnesota Statute: 609.713.3(a)(1), with reference to: 609.05.1

Maximum Sentence: 1 year and 1 day or \$3,000 fine, or both

Offense Level: Felony

Offense Date (on or about): 11/28/2025

Control #(ICR#): 25034237

Charge Description: On or about November 28, 2025, in the County of Blue Earth, Minnesota, Jhoel Christoffe Dillon did intentionally aid, advise, hire, counsel, or conspire with, or otherwise procure another to commit the crime, and/or did personally commit said crime; to wit: did display, exhibit, brandish, or otherwise employed a replica firearm or a BB gun in a threatening manner; and caused or attempted to cause terror in another person.

**COUNT IV**

**Charge: Riot-2nd Degree-Armed w/Dangerous Weapon**

Minnesota Statute: 609.71.2

Maximum Sentence: 5 years or \$10,000 fine, or both

Offense Level: Felony

Offense Date (on or about): 11/28/2025

Control #(ICR#): 25034237

Charge Description: On or about November 28, 2025, in the County of Blue Earth, Minnesota, Jhoel Christoffe Dillon did together with two or more other persons assembled, disturb the peace by an intentional act or threat of unlawful force or violence to person or property, knowing that any other participant was armed with a dangerous weapon.

## STATEMENT OF PROBABLE CAUSE

On November 28, 2025, at approximately 10:01 PM, officers from the North Mankato Police Department were dispatched on a report of several victims in a Chevrolet Malibu being followed by a car in North Mankato. North Mankato officers followed the complainant, who was in the Malibu with three other victims, back to his vehicle which was parked at a restaurant near the intersection of Highway 14 and Highway 169. North Mankato officers advised that two individuals that were suspected to be involved in following the complainant's vehicle were now fleeing on foot.

North Mankato officers advised they had one of the suspects in custody and were still searching for the second suspect. The suspect in custody would be identified as Salman Brain Ali.

The North Mankato officers advised that the complainant, Victim 2, stated that they (he and three other victims) were at the top level of the Mankato Place ramp hanging out when several individuals, including Ali, had assaulted them with guns.

Ofc. Maxwell Strong, with the Mankato Department of Public Safety, arrived at the scene and began interviewing the victims. Ofc. Strong first spoke with Victim 1.

Victim 1 stated that he and three other persons (Victim 2, Victim 3 and Victim 4), had driven to the top floor the Mankato Place ramp as it is a common hangout spot. Victim 1 stated that they were on the top floor of the ramp for approximate 15 minutes when a black car suddenly drove up behind them and approximately seven males approached their Chevrolet Malibu. Victim 1 reported that some of the males had handguns. Victim 1 stated that the males were wearing darker clothing and masks.

Victim 1 stated that the males were tapping on the windows of the car with handguns. Victim 1 advised that at least four of the males were in possession of handguns. Victim 1 stated that none of the males said anything, but Victim 1 stated they were pointing their guns at him. Victim 1 stated that he felt scared for his life and thought he was going to die.

Victim 1 stated that the incident lasted approximately 15 seconds at which point he and the other victims drove out of the ramp to get away from the group of males.

Ofc. Strong then spoke with Victim 2. Victim 2 stated that he had gone with the other victims to the Mankato Place ramp to hang out. Victim 2 stated that while they were on the top level of the ramp, he observed a black vehicle and a large group of individuals approach the Malibu that he and the other victims were in. Victim 2 stated he observed that some of the males had handguns and that the handguns appeared similar to that of Ofc. Strong's duty weapon.

Victim 2 stated that the males were tapping the window of the car with their handguns but that he was unable to tell if they were pointing their guns at him. Victim 2 stated he felt panicked during the situation and thought it was a robbery. Victim 2 stated that Victim 3, who was driving the Malibu, quickly backed up and drove out of the ramp. Victim 2 stated that he had to take over driving for Victim 3 as Victim 3 was so emotional from the incident.

Victim 2 stated that they drove to North Mankato when he realized that the vehicle he had observed at the ramp was following them. Victim 2 stated that they called 911 and met with North Mankato officers at a gas station in upper North Mankato.

Victim 2 stated that North Mankato officers followed the four victims back to the restaurant to retrieve

Victim 2's vehicle. Upon arrival at the restaurant, they observed two of the males believed to be involved in the incident at Victim 2's vehicle and the back window of Victim 2's vehicle had been broken out. One of the two males was Ali.

When Ali was arrested, he was found to be in possession of a black facemask. A show-up of Ali was conducted in front of Victim 1 and Victim 2. Victim 1 and Victim 2 believed that Ali was one of the involved males at the parking ramp and believed him to also have displayed a gun during the incident.

A review of Mankato City CCTV showed the incident on video. At approximately 9:40 PM the Chevrolet Malibu containing the victims is observed parked against the south wall on the top level of the ramp. Prior to the Malibu entering the ramp, a group of individuals with masks and darker clothing can be seen gathering in the stairwell of the ramp. A black Toyota Camry is then seen approaching the victim's vehicle with the group of males from the stairwell following on foot.

The Camry gets behind the victim's vehicle and blocks it against the wall. Three individuals, including Ali, are seen getting out of the Camry. The driver remains in the vehicle. Seven individuals (three from the Camry and four from the stairwell) then approached the victim's vehicle and appear to be pointing objects at the car and hitting the windows. The victim's Malibu's reverse lights then turn on and the Camry pulls forward. The victim's vehicle then quickly reverses out of the spot and drives toward the exit.

On the video Ali is observed exiting the front passenger seat of the Camry and approaching the passenger side of the victim's vehicle. Ali is observed hitting the window with an object that appeared similar to that of a gun. Ali is later seen pointing the gun at the victim's vehicle as it drives away.

Also shown on the CCTV from the ramp were two additional vehicles that were involved in the incident. One of the vehicles was a purple/black Mazda bearing Minnesota license plate SJN 892 and the other was a black Lincoln MKX bearing Minnesota license plate ZHE 157.

Ofc. Carver Christianson located the Toyota Camry in the City of Mankato. During a search of the Camry a BB gun handgun was located in the trunk of the vehicle.

On November 29, 2025, at approximately 9:50 PM, Ofc. Christianson observed the Mazda bearing Minnesota license plate SJN 892 turning northbound onto Hosanna Dr. from Hoffman Road. Ofc. Christianson immediately recognized this as one of the vehicles involved in the weapons incident at the parking ramp.

Ofc. Christianson effectuated a traffic stop of the vehicle. Ofc. Christianson approached the vehicle and directed the male driver to step out. The male driver would be identified as Jhoel Chistoffe Dillon. There was a female passenger in the car.

Dillon was transported to the Public Safety Center where Ofc. Christianson spoke with him. Dillon agreed to speak without an attorney present. Dillon stated that he picked up two individuals who he identified as "Six" and "Abdi" and drove to the parking ramp the night prior.

Dillon stated that once they were at the ramp, he and a group of other individuals went into the stairwell before going to the top of the ramp where the Malibu was parked. Dillon stated that he heard others in the group saying they wanted to speak with "that guy" and wanted to get something from him.

Dillon stated that he and the group ran up to the Malibu. Dillon stated that he began aggressively pulling on the rear driver's side door handle, but the door was locked. Dillon stated that he did not have a handgun.

Dillon stated that after the Malibu left the ramp, he returned to his car and left the ramp as well. Dillon stated that he followed the Malibu for a time wanting to see if he recognized anyone in the vehicle.

After following the Malibu, Dillon returned to the parking lot of the restaurant near the intersection of Highway 14 and Highway 169. Upon arriving at the parking lot he saw law enforcement officers. Dillon then stated he picked up "Six" and "Abdi" in a nearby parking lot and they all left the area in Dillon's vehicle.

Dillon stated that multiple persons involved in the assault had handguns including "Six."

## 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**

Brent Gagnon  
Police Officer  
710 S Front St  
Mankato, MN 56001-3803  
Badge: 3124

Electronically Signed:  
03/27/2026 11:24 AM  
Blue Earth County, Minnesota

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

**Prosecuting Attorney**

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

Electronically Signed:  
03/27/2026 11:06 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 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: March 27, 2026.

**Judicial Officer**

Bradley C Walker  
District Court Judge

Electronically Signed: 03/27/2026 11:34 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.

**Jhoel Christoffe Dillon**

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: