Filed in District Court

APR 24 2025

State of Minnesota

State of Minnesota
County of Carver

District Court
1st Judicial District

Prosecutor File No. 0100107436
Court File No. 10-CR-25-351

State of Minnesota,
Plaintiff,

vs.

JAMIE NICOLE HOLCOMBE DOB: 04/29/1996
114 Terrace Dr W
Watertown, MN 55388
Defendant.

COMPLAINT
Warrant
[X] 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: Bestiality-Carnally Know Dead Body/Animal/Bird-M
Minnesota Statute: 609.294, with reference to: 609.294
Maximum Sentence: 364 days and/or $3,000 fine
Offense Level: Gross Misdemeanor

Offense Date (on or about): 11/02/2024

Control #(ICR#): 25010268

Charge Description: On or about November 2, 2024, in the County of Carver, State of Minnesota, the defendant did carnally know an animal and the act was knowingly done in the presence of another.

COUNT II

Charge: Bestiality-Carnally Know Dead Body/Animal/Bird-M
Minnesota Statute: 609.294, with reference to: 609.294
Maximum Sentence: 90 days or $1,000 fine, or both.
Offense Level: Misdemeanor

Offense Date (on or about): 03/16/2025

Control #(ICR#): 25010268

Charge Description: On or about March 16, 2025, in the County of Carver, State of Minnesota, the defendant did carnally know an animal.

COUNT III

Charge: Obstruct Legal Process-Lawful Execution Legal Process
Minnesota Statute: 609.50.1(1), with reference to: 609.50.2(2)
Maximum Sentence: One year and/or $3,000 fine
Offense Level: Gross Misdemeanor

Offense Date (on or about): 04/18/2025

Control #(ICR#): 25010268

Charge Description: On or about April 18, 2025, within the County of Carver State of Minnesota, the defendant intentionally obstructed, hindered, or prevented the lawful execution of any legal process, civil or criminal, and the act was accompanied by force or violence or the threat thereof.

COUNT IV

Charge: Damage to Property-4th Deg-Intentional Damage-Other Circumstances
Minnesota Statute: 609.595.3, with reference to: 609.595.3
Maximum Sentence: 90 days or $1,000 fine, or both.
Offense Level: Misdemeanor

Offense Date (on or about): 04/18/2025

Control #(ICR#): 25010268

Charge Description: On or about April 18, 2025, in the County of Carver, Minnesota, State of Minnesota, defendant intentionally, without the consent of the owner or person in lawful possession, caused damage to physical property, and the damage reduced the value of the property by less than $500.

MINNESOTA JUDICIAL BRANCH

STATEMENT OF PROBABLE CAUSE

On April 10, 2025, a search warrant was executed on the residence of Jess Holcombe (hereinafter "Jess") and JAMIE NICOLE HOLCOMBE, DOB 04/29/1996, the defendant herein pursuant to a child pornography investigation. The defendant's residence is located at an identified address on Terrace Drive, in the City of Watertown, County of Carver. Electronic devices, including both Jess and the defendant's cell phones, were seized pursuant to the search warrant. While executing the search warrant, Carver County Sheriff's Detectives located a male dog, "Jax", present in the home. Forensic examination was completed on Jess's cell phone. Detective Cepuran located two images of apparent bestiality on Jess's phone. One image has a last written date of November 2, 2024. The image shows the defendant, nude from the waist down and identified via a unique tattoo. A dog, clearly identifiable as Jax, is licking the defendant's nude anus. The background of the image is the defendant and Jess's bedroom. It is clear from the angle of the image that the image was taken by a third party.

A second image was located that has a last written date of November 2, 2025. This image shows a dog, clearly identifiable as Jax, inserting his erect penis into the defendant's vagina. The defendant is identified due to a distinct tattoo, and the bedding /background of the image is the defendant and Jess's bedroom. It is clear from the angle of the image that the image was taken by a third party.

Forensic examination was completed on the defendant's cell phone. Detective Cepuran located a 10 second video with a last writen date of March 16, 2025, that had a file path of the camera roll of the phone. The video shows the defendant nude from the waist down with her legs spread open. The defendant can be identified in the video by a distinct tattoo. A dog, clearly identifiable as Jax, is performing cunnilingus on the defendant.

Due to the ongoing course of conduct, the State believes a warrant is necessary to prevent imminent harm to Jax.

In a post-Miranda interview, the defendant admitted that one of her sexual preferences is bestiality. When the defendant ended the interview, she was advised she was under arrest due to an arrest warrant. The defendant then began to actively resist, flailing her arms and dropping to the ground. The defendant then tried to roll away from detectives and pull her arms away from them. The defendant refused to put her hands behind her back when directed to do so by detectives. Due her to resistance she was placed on her stomach so detectives could place her in handcuffs. The defendant then began to forcefully bash her head into a wooden cabinet in the interview room of the Carver County Sheriff's Office, and also began kicking her legs. The defendant bashing of the wooden cabinet caused damage to the cabinet. The cost of the cabinet was $156.93. When handcuffed, the defendant continued to try to pull away and pull her hands out of the handcuffs.

The defendant was turned over to staff at the Carver County Jail for booking. While completing the

process, the defendant began bashing her head into a concrete wall.

PLEASE TAKE NOTICE: Pursuant to Minn. Stat. 609.49., intentional failure to appear for duly scheduled court appearances may result in additional criminal charges, and in addition to any arrest warrant that may otherwise be issued by the Court.

MINNESOTA JUDICIAL BRANCH

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

Pat Schwarzhoff
Deputy Sheriff
606 E 4th Street
Chaska, MN 55318
Badge: 863

Electronically Signed:
04/24/2025 11:22 AM
Carver County, Minnesota

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

Prosecuting Attorney

Angella Erickson
604 E Fourth Street
Chaska, MN 55318
(952) 361-1400

Electronically Signed:
04/22/2025 02:18 PM

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***

☒ ***This warrant may be executed at any time of the day or night and on Sundays or legal holidays.***

☐ 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: $50,000.00
Conditions of Release: tbd

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: April 24, 2025.

Judicial Officer Eric Braaten Electronically Signed: 04/24/2025 11:34 AM

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

COUNTY OF CARVER
STATE OF MINNESOTA

State of Minnesota
Plaintiff
vs.
Jamie Nicole Holcombe
Defendant

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

Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

Name:	Jamie Nicole Holcombe
DOB:	04/29/1996
Address:	114 Terrace Dr W Watertown, MN 55388
Alias Names/DOB:	
SID:	MN19BL2756
Height:	
Weight:	0lbs.
Eye Color:	
Hair Color:	
Gender:	
Race:	
Fingerprints Required per Statute:	Yes
Fingerprint match to Criminal History Record:	Yes
Driver's License #:	S839125116920 (MN)
Alcohol Concentration:	

MINNESOTA JUDICIAL BRANCH

STATUTE AND OFFENSE GRID

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	11/2/2024	609.294 Bestiality-Carnally Know Dead Body/Animal/Bird-M	Gross Misdemeanor	Z2800		MN0100000	25010268
	Penalty	11/2/2024	609.294 Bestiality-Carnally Know Dead Body/Animal/Bird-M	Gross Misdemeanor	Z2800		MN0100000	25010268
2	Charge	3/16/2025	609.294 Bestiality-Carnally Know Dead Body/Animal/Bird-M	Misdemeanor	Z3800		MN0100000	25010268
	Penalty	3/16/2025	609.294 Bestiality-Carnally Know Dead Body/Animal/Bird-M	Misdemeanor	Z3800		MN0100000	25010268
3	Charge	4/18/2025	609.50.1(1) Obstruct Legal Process-Lawful Execution Legal Process	Gross Misdemeanor	X2080		MN0100000	25010268
	Penalty	4/18/2025	609.50.2(2) Obstruct Legal Process-Force/Violence or Threat of	Gross Misdemeanor	X2080		MN0100000	25010268
4	Charge	4/18/2025	609.595.3 Damage to Property-4th Deg-Intentional Damage-Other Circumstances	Misdemeanor	P3100		MN0100000	25010268
	Penalty	4/18/2025	609.595.3 Damage to Property-4th Deg-Intentional Damage-Other Circumstances	Misdemeanor	P3100		MN0100000	25010268

MINNESOTA JUDICIAL BRANCH