

State of Minnesota,

Plaintiff,

vs.

REGGIE DELANIE HARPER DOB: 04/29/1991

2101 74th Crt N
Brooklyn Park, MN 55444

Defendant.

COMPLAINT

Warrant

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: Murder - 2nd Degree - With Intent-Not Premeditated

Minnesota Statute: 609.19.1(1), with reference to: 609.19.1(1)

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 12/09/2014

Control #(ICR#): 14059704

Charge Description: That on or about 12/9/2014, in Hennepin County, Minnesota, REGGIE DELANIE HARPER, caused the death of (victim), a human being, with intent to effect the death of that person or another, but without premeditation.

STATEMENT OF PROBABLE CAUSE

Complainant has investigated the facts and circumstances of this offense and believes the following establishes probable cause:

On December 9, 2014, Brooklyn Park police officers were dispatched to a Brooklyn Park Hennepin County address on a report of an unconscious infant. Dispatch indicated that a one-year-old at the residence was not breathing.

Officers arrived on scene, knocked on the door of the residence, and made contact with CAP, who was holding her one-year-old son, KRH (Victim 1 herein). CAP was crying and asking for help from police. CAP laid Victim 1 on the floor so officers could provide medical attention to him. While Victim 1 was lying on the floor, officers checked to see if he was breathing and were unable to find a pulse.

Officers could see that Victim 1's chest had red marks and bruises around his neck area. After observing those marks officers began chest compressions and paramedics arrived to assist with providing medical treatment. Victim 1 was transported to the hospital.

Officers spoke with CAP, who said that Victim 1's biological father, Reggie Delanie Harper, DOB 4/21/1991 (defendant herein) assaulted Victim 1 and left the residence to an unknown location. Officers spoke with CAP to get more details about what occurred and learned the following:

The defendant had arrived to stay with CAP, Victim 1, and their other biological son, ADH, age 3 (Victim 2 herein) approximately 3 weeks ago. They reside in the lower level of the home. There is a current order for protection in place prohibiting the defendant from having contact with CAP, Victim 1 and Victim 2. At approximately 7 pm, the defendant laid Victim 1 down in a crib in the living room to go to sleep for the evening. Victim 1 started to fuss and cry, so CAP got up to hold him. The defendant told CAP that Victim 1 was a child and he didn't care what the child wanted, so CAP needed to sit down. The defendant then picked up Victim 1 from the crib grabbing him by the neck and shoulder. He took Victim 1 out of the crib and put him on the floor. CAP then saw the defendant punch Victim 1 multiple times in the chest because he was crying. CAP wanted the defendant to stop hurting Victim 1 and tried grabbing him to get him to stop. The defendant shrugged her off and stated "shut the fuck up and sit the fuck down or you'll be next." After the defendant punched Victim 1 multiple times in the chest he threw him back into the crib.

CAP had previously been assaulted by the defendant in Michigan when the defendant had assaulted Victim 1 and CAP tried to intervene and stop him. CAP tried to check on Victim 1 in the crib because he wasn't making any noise and the defendant prevented her from checking on him. Instead, the defendant walked over to the crib and picked Victim 1 up. CAP's friend, AM came home during this time, and CAP alerted AM that Victim 1 was not breathing. AM attempted CPR on Victim 1, and called 911 to get help. The defendant became very nervous and told CAP that he was going to jail if she told police what happened. The defendant then fled the scene.

CAP went to the hospital with police and her mother and was informed that medical personnel could not revive Victim 1 and he was deceased. Victim 1 had bruises in multiple places on his body, with a concentration of bruising on the chest, neck and shoulders. An autopsy revealed that Victim 1 died from multiple blunt force injuries, including a tear in the lungs that caused bleeding into the lung cavities, and a lacerated liver, which caused an excessive amount of bleeding into the abdomen.

On December 11, police found the defendant hiding under a bed in the home. CAP and Victim 2 were not present; Victim 2 had been admitted to North Memorial Medical Center on December 9th with medical

conditions and injuries highly suspicious for child abuse.

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

Scott Parsons
Detective
5400 85th Ave N
Brooklyn Park, MN 55443
Badge: 102

Electronically Signed:
12/12/2014 11:05 AM

Subscribed and

Notary Public (
Judicial Officer

Being authorized

Prosecuting At



