

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 21A02042
Court File No. 27-CR-21-3953

State of Minnesota,
Plaintiff,

COMPLAINT
Order of Detention

vs.

TIMOTHY LEE HELLER DOB: 05/10/1978

NPA

Defendant.

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 - Without Intent - While Committing a Felony

Minnesota Statute: 609.19.2(1), with reference to: 609.19.2(1)

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 02/20/2021

Control #(ICR#): 21006179

Charge Description: That on or about February 20, 2021, in Hennepin County, Minnesota, TIMOTHY LEE HELLER, did without intent to effect the death of any person, assault Victim causing substantial bodily harm which subsequently caused the death of Victim.

STATEMENT OF PROBABLE CAUSE

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

On February 21, 2021, a 911 call was placed in the City of Saint Paul reporting an unresponsive female, hereinafter Victim. Saint Paul Fire and Rescue responded to a residence located on the 1500 block of Jackson Street in Saint Paul. Immediately upon observing Victim, first responders suspected she had been recently assaulted and requested police assistance. Victim had obvious signs of inflicted trauma on her face including two black eyes, multiple lacerations and extensive swelling to her face. Witnesses on scene indicated that Victim had used controlled substances prior to becoming unresponsive. Victim did not regain consciousness and was pronounced dead.

Saint Paul Police initiated an investigation into the death. Witnesses at the residence reported Victim was dropped off at the residence during the evening on February 20, 2021. Witnesses told officers that Victim was severely beaten and injured upon her arrival. Victim told residents that she had been assaulted by her boyfriend, TIMOTHY LEE HELLER, DOB: 5/10/78, the Defendant herein. The witnesses tried to convince Victim to seek medical attention, but she refused. While at the residence, Victim complained of stomach pain prior to being found unresponsive.

Through investigation police learned that Victim and Defendant had been staying at a residence located on the 7500 block of Brunswick Avenue in the City of Brooklyn Park, Hennepin County. Police responded to the Brooklyn Park address and confirmed with owners of the residence that Victim and Defendant had in fact been staying there. The owners, Witness 1 and Witness 2, stated that Defendant was homeless and that they opened their home to Defendant two weeks earlier due to the very cold temperatures. After one week, Defendant asked if his girlfriend, Victim, could also stay at the house and the witnesses agreed. Witness 1 and Witness 2 stated that during Victim's short stay they did not observe that Victim had suffered any injuries.

On February 20, 2021, Victim and Defendant were informed by Witness 1 and Witness 2 that they needed to leave the house by the next day. Later on February 20th, Witness 2 observed Victim walking toward the home with Defendant. Witness 2 observed that at that time Victim had extensive visible injuries to her face. Victim told Witness 2 that Defendant had caused her injuries. Witness 1 then confronted Defendant about Victim's injuries and began to physically fight Defendant. Defendant fled on foot and both Witness 1 and Witness 2 attempted to convince Victim to go to the hospital. Victim did not want to go to the hospital but requested a ride to Saint Paul to stay with friends at the residence on the 1500 block of Jackson Street. Witness 1 and Witness 2 drove Victim to get something to eat and dropped her off at her request. Prior to dropping Victim off, the witnesses took a photograph of Victim's injury. Both witnesses reported that they were familiar with Defendant long history of prior assaultive behavior.

Witness 1 and Witness 2 provided police with access to the bedroom where Victim and Defendant were staying. The bedroom walls had visible blood spatter and there was a large dent in the drywall that the homeowners stated was not there prior to Defendant's stay.

The Ramsey County Medical Examiner's Office performed an autopsy on Victim on February 21, 2021. Victim was found to have numerous traumatic injuries consistent with inflicted assault including numerous contusions, abrasions and hemorrhages covering her entire face, torso and extremities. Notably, Victim had observable bruising and hemorrhages present in her neck area that appeared indicative of manual strangulation. Victim's most serious injuries were located in her abdominal area. The Medical Examiner noted a contusion of the epigastric area of the abdomen and a large gaping laceration of the smaller

curvature of the stomach. These injuries reflected a ruptured stomach which resulted in acute peritonitis causing Victim's death. The Medical Examiner indicated these injuries were caused by blunt trauma to the abdominal area. The Medical Examiner ruled Victim's death a homicide.

Defendant was apprehended by police on February 22, 2021. During a Mirandized interview, Defendant denied being responsible for Victim's death but did admit to punching Victim in the face and blackening both of her eyes. He also admitted to headbutting her and causing a variety of other injuries. Defendant confirmed police would find blood in the bedroom he and Victim stayed in at the Brooklyn Park residence. Without being told about Victim's abdominal injuries, Defendant spontaneously told police that Victim had been assaulted by another boyfriend four weeks earlier who stomped on her stomach.

Defendant has been convicted of the following Qualified Domestic Violence Related Offenses:

62-CR-18-8725- Felony Violation of No Contact Order – convicted 1/2/2019;
62-SU-CR-16-1347- DANCO Violation – convicted 5/19/2016;
62-CR-16-1076- GM- DANCO- convicted 6/14/2016;
62-CR-16-819- Felony 3rd Degree Assault – convicted 6/8/2016;
62-SU-CR-125- Domestic Assault – convicted 1/3/2012;
62-K2-05-003193- Domestic by Strangulation- convicted 1/26/2006;
62-K5-00-000088- Domestic Assault /2 within 5 years – convicted 5/3/2000;
62-K5-97-000404- Violation of Protection Order- convicted 4/15/1997;
62-K8-96-002945- Assault 5th Degree- convicted on 1/7/1997 (convicted on 2 counts);
62-K7-97-002705- (OFP Violation) – convicted 2/10/1998; and
1997-CF-000171 Substantial Battery- Intent (Felony) – Found Guilty 12/15/2000.

Defendant is currently in custody.

PLEASE TAKE NOTICE that the State will pursue an aggravated sentence in this case based on the particular cruelty and gratuitous violence with which Defendant treated Victim and based on Defendant's status as a Career Offender pursuant to Minn. Stat. 609.1095.

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

Shawn Fricke
Detective
5400 85th Ave N
Brooklyn Park, MN 55443
Badge: 191

Electronically Signed:
02/26/2021 11:43 AM
Hennepin County, Minnesota

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

Prosecuting Attorney

Rachel Kraker
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
02/26/2021 11:29 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: \$2,000,000.00

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: February 26, 2021.

Judicial Officer

Luis Bartolomei
District Court Judge

Electronically Signed: 02/26/2021 11:49 AM

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

**COUNTY OF HENNEPIN
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

TIMOTHY LEE HELLER

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:

DEFENDANT FACT SHEET

Name: TIMOTHY LEE HELLER
DOB: 05/10/1978
Address: NPA
Alias Names/DOB:
SID: MN96014498
Height:
Weight:
Eye Color:
Hair Color:
Gender: MALE
Race: Black
Fingerprints Required per Statute: Yes
Fingerprint match to Criminal History Record: Yes
Driver's License #:
SILS Person ID #: 433833
SILS Tracking No. 3216197
Alcohol Concentration:

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	2/20/2021	609.19.2(1) Murder - 2nd Degree - Without Intent - While Committing a Felony	Felony	H2851		MN0270300	21006179
	Penalty	2/20/2021	609.19.2(1) Murder - 2nd Degree - Without Intent - While Committing a Felony	Felony	H2851		MN0270300	21006179