

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 16A07318
Court File No. 27-CR-17-11117

State of Minnesota,
Plaintiff,

COMPLAINT
Order of Detention

vs.

NICHOLAS LANCE LARSON DOB: 03/10/1990

1120 Pierce Street S
Shakopee, MN 55379

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): 12/22/2015

Control #(ICR#): 15461936

Charge Description: That on or about 12/22/2015, in Minneapolis, Hennepin County, Minnesota, Nicholas Lance Larson, did without intent to effect the death of any person, cause the death of Victim, a human being, while committing or attempting to commit the felony offense of Assault in the Third Degree.

STATEMENT OF PROBABLE CAUSE

Complainant, a licensed peace officer with the Minneapolis Police Department, has investigated the facts and circumstances of this offense and believes the following establishes probable cause:

On December 22, 2015, Minneapolis Police Officers and emergency medical personnel were dispatched to a known residence located in Minneapolis, Hennepin County, Minnesota, regarding a one-year-old child, hereinafter referred to as Victim, who had sustained serious injuries. Victim was immediately transported to the hospital.

Investigation revealed that Victim's parents left Victim in the care of her nanny, A.F., at Victim's home. Investigation also revealed that A.F.'s husband, NICHOLAS LANCE LARSON, the defendant herein, was present at Victim's home at the time of the injury and 911 call, as was A.F. and the defendant's children. A.F. and the defendant were the only adults present at the time officers arrived at the home.

Doctor Marjorie Hogan, a child abuse physician, saw Victim at Hennepin County Medical Center and diagnosed Victim with suffered a subdural brain bleed, primarily on the left side, bi-lateral retinal hemorrhages and cerebral edema as a result of a traumatic brain injury. Victim also suffered injuries to her ears that were from pulling the external part of her ears. Dr. Hogan stated that the injuries to the ears were "specific for abuse" and that all of Victim's injuries were consistent with Child Abuse.

Complainant spoke to Victim's pediatrician, who saw Victim on December 21, 2015 for a cough and fever. Victim's pediatrician stated that she did not observe any bruising on Victim's body, including her ears.

S.E., Victim's father, was interviewed. S.E. reported that Victim was behaving normally in the morning before he left for work and left Victim in the care of A.F. S.E. reported that he received a call from A.F. around 2:40 in the afternoon and A.F. stated that Victim was having trouble breathing. S.E. stated that he did not observe any injuries to Victim's head, neck or ears prior to leaving for work.

A.E., Victim's mother, confirmed that she also did not observe any injuries to Victim's head, neck, or ears that morning before she went to work.

On December 23, 2015, Victim died as a result of her injuries. An autopsy was performed. The Medical Examiner concluded that Victim suffered Blunt Force Injuries.

Dr. Mark Hudson, a child abuse specialist, was also consulted regarding this case. Dr. Hudson noted the injuries to Victim as listed above and concluded that he agreed with the child abuse assessment. Dr. Hudson specifically noted that the bilateral ear injuries were very significant. Dr. Hudson noted that there was no prior history of trauma to account for her injuries. Dr. Hudson stated that Victim's presentation was consistent with the injuries occurring shortly before presentation at the hospital and certainly after 8:30 a.m. when Victim was left in the care of A.F. and Defendant.

Swabs were taken from Victim's ears and compared to a known DNA sample from the defendant. The results showed that DNA located on Victim's right ear matched the Y-chromosomal DNA profile of the defendant. The DNA located on Victim's right ear does not match either parent or A.F.

A.F. was interviewed and reported that the defendant was alone with Victim for a period of time before she became symptomatic. A.F. reported that after the ambulance took Victim to the hospital, the defendant told her that she needed to lie to the police and tell them that he never touched Victim that day. A.F. reported that she did as the defendant told. A.F. reported that she is afraid of the defendant.

The defendant is currently in custody.

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

Twila Kay Vilella
Sergeant Investigator
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 7418

Electronically Signed:
05/05/2017 09:01 AM
Hennepin County, Minnesota

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

Prosecuting Attorney

Dan Allard
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
05/05/2017 08:21 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 _____, _____ at _____ AM/PM before the above-named court at 300 S Sixth Street, Minneapolis, MN 55487 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: \$1,000,000.00

Conditions of Release: No Contact with Witnesses

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: May 5, 2017.

Judicial Officer

Tanya Bransford
District Court Judge

Electronically Signed: 05/05/2017 10:07 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.

Nicholas Lance Larson

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: