

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No.

18A09358

Court File No.

27-CR-18-23849

State of Minnesota,

COMPLAINT

Plaintiff,

Warrant

vs.

JENNIFER LYNN BALDWIN DOB: 12/14/1980

6400 FREMONT AVE N
BROOKLYN CENTER, MN 55430

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), 609.223.1

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 03/15/2018

Control #(ICR#): 18001042

Charge Description: That on or about 3/15/2018, in Hennepin County, Minnesota, JENNIFER LYNN BALDWIN , did without intent to effect the death of any person, cause the death of the victim, a human being, while committing or attempting to commit the felony offense of Assault in the Third Degree - Substantial Bodily Harm.

COUNT II

Charge: Murder - 2nd Degree - Without Intent - While Committing a Felony

Minnesota Statute: 609.19.2(1), with reference to: 609.19.2(1), 609.223.3

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 03/15/2018

Control #(ICR#): 18001042

Charge Description: That on or about 3/15/2018, in Hennepin County, Minnesota, JENNIFER LYNN BALDWIN , did without intent to effect the death of any person, cause the death of the victim, a human being, while committing or attempting to commit the felony offense of Assault in the Third Degree - Victim Under Four.

STATEMENT OF PROBABLE CAUSE

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

On March 15, 2018 at approximately 11:48 AM, police and paramedics responded to a residence in Brooklyn Center, Hennepin County, Minnesota on a report of an infant in need of medical attention. Upon arrival, officers observed the nine-month-old baby, hereafter "the victim," to be lethargic and laboring to breathe. JENNIFER LYNN BALDWIN, DOB: 12/14/1980, Defendant herein, was the only adult present at the address and told first-responders that the victim's mother had dropped the victim off for Defendant to babysit approximately an hour earlier. The victim was transported by ambulance to the hospital where he was treated for a severe head injury, including intracranial bleeding and swelling. Despite lifesaving efforts, the victim suffered brain death and passed away on March 20, 2018. The victim was 9 months and 13 days old at his death.

The victim's mother told investigators that she and the victim woke up between 7:30 and 8:30 AM on March 15, 2018. The victim's mother took him to a friend's home nearby where the friend's mother watched and played with the victim while the victim's mother showered and got ready for work. Both women reported that the victim appeared uninjured and was acting normally during the morning, although he had spit up formula in the car before arriving at the friend's home. The victim and his mother were at the friend's home from approximately 8:45 AM until just after 10:00 AM. The victim's mother drove directly from the friend's home in Blaine to Defendant's home in Brooklyn Center, arriving at approximately 10:30 AM. At the time she arrived at Defendant's home and when she left, the victim appeared uninjured and physically fine.

At 11:39 AM, Defendant called the victim's mother and told her that she needed to come get the victim because "something's not right." The victim's mother told Defendant to call 911. The victim's mother then called the victim's father. The victim's father also called Defendant and told her to call 911. Defendant called 911 at 11:46 AM.

The Hennepin County Medical Examiner's Office conducted an autopsy and observed evidence of blunt force head injury, including: a subdural hematoma, subdural and subarachnoid hemorrhage, brain damage and cell death caused by oxygen and blood deprivation, and contusions on the left scalp and right ear. In addition, examination of the victim's eyes revealed retinal hemorrhages in both eyes extending through all retinal layers, retinal folds, and hemorrhages surrounding the optic nerves. The cause of death was blunt force head injury, and the manner of death was homicide.

A pediatric child abuse specialist from Midwest Children's Resource Center was consulted regarding the victim's injuries. The specialist opined that a child who had sustained the injuries the victim had sustained would manifest symptoms such as lethargy and unresponsiveness immediately after the infliction of the injury.

Defendant was questioned by investigators and initially relayed the following: The victim's mother had dropped him off between approximately 10:30 and 10:45 AM. After the victim arrived, Defendant said she sat the victim down on the living room floor and the victim played with Defendant's two-year-old son for "maybe 20 minutes or so." Defendant then noticed that the victim had taken her son's bottle and was drinking his milk, so Defendant made a bottle for the victim and laid him on a pillow on the floor to drink it. Defendant said the victim then fell asleep in less than 5 minutes and slept for 20-30 minutes. Defendant reported that the victim was "fussing" when he woke up, so she picked him up and went to retrieve a dry outfit for him. When Defendant laid the victim down on the floor to change him, she noticed his eyes "would roll back" and he looked like "he was in a different world."

Defendant was interviewed once again by an investigator after the autopsy was complete and the pediatric child abuse specialist had been consulted. When the investigator confronted Defendant with the medical evidence of blunt force trauma, Defendant admitted that she had handled the victim "aggressively" and "roughly" on the morning of March 15, 2018. Defendant admitted that she has never handled a child as "roughly" as she did the victim that day. Defendant acknowledged that, when the victim arrived at her home, he had been able to sit, play with toys, interact with her children, and hold his own bottle to drink. Defendant admitted to the investigator that she had not gotten much sleep the night before, and she had not taken her medications for anxiety and mood disorder that morning. She recently regained custody of her children from Child Protection, and she was experiencing financial problems. Defendant said that she noticed the concerning changes in the victim's appearance and behavior immediately after handling him in a rough and aggressive manner.

Defendant is not in custody. The State requests this case issue as a warrant in the interest of public safety and because bail and/or conditions of release are necessary to assure Defendant's reappearance due to the serious nature of the charges.

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.

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| Complainant | Terry Olson Detective 6645 Humboldt Avenue N Brooklyn Center, MN 55430 Badge: 114 | Electronically Signed: 09/24/2018 09:03 AM Hennepin County, Minnesota |
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Being authorized to prosecute the offenses charged, I approve this complaint.

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| Prosecuting Attorney | Paige L Starkey 300 S 6th St Minneapolis, MN 55487 (612) 348-5550 | Electronically Signed: 09/24/2018 08:57 AM |
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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: \$500,000.00

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: September 24, 2018.

Judicial Officer

Toddrick Barnette

Electronically Signed: 09/24/2018 11:07 AM

District Court Judge

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

COUNTY OF HENNEPIN
STATE OF MINNESOTA

State of Minnesota

Plaintiff

vs.

JENNIFER LYNN BALDWIN

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: JENNIFER LYNN BALDWIN
DOB: 12/14/1980
Address: 6400 FREMONT AVE N
BROOKLYN CENTER, MN 55430

Alias Names/DOB:

SID:

Height:

Weight:

Eye Color:

Hair Color:

Gender: FEMALE

Race: Unknown

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: No

Driver's License #:

SILS Person ID #: 448435

SILS Tracking No. 3027700

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 | 3/15/2018 | 609.19.2(1) Murder - 2nd Degree - Without Intent - While Committing a Felony | Felony | H2855 | | MN0270200 | 18001042 |
| | Penalty | 3/15/2018 | 609.223.1 Assault-3rd Degree-Substantial Bodily Harm | Felony | H2855 | | MN0270200 | 18001042 |
| | Penalty | 3/15/2018 | 609.19.2(1) Murder - 2nd Degree - Without Intent - While Committing a Felony | Felony | H2855 | | MN0270200 | 18001042 |
| 2 | Charge | 3/15/2018 | 609.19.2(1) Murder - 2nd Degree - Without Intent - While Committing a Felony | Felony | H2855 | | MN0270200 | 18001042 |
| | Penalty | 3/15/2018 | 609.223.3 Assault-3rd Degree-Victim Under Four | Felony | H2855 | | MN0270200 | 18001042 |
| | Penalty | 3/15/2018 | 609.19.2(1) Murder - 2nd Degree - Without Intent - While Committing a Felony | Felony | H2855 | | MN0270200 | 18001042 |