

State of Minnesota,

Plaintiff,

vs.

PIERRE BARLEE COLLINS DOB: 03/15/1982

5450 Douglas Dr. N. #129
Crystal, MN 55429

Defendant.

COMPLAINT

Order of Detention

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): 03/18/2015

Control #(ICR#): 15005763

Charge Description: That on or about 3/18/2015, in Hennepin County, Minnesota, Pierre Barlee Collins, caused the death of B.C., 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 the morning of March 18, 2015, B.C. a known juvenile male, d.o.b. 11-10-2004, hereinafter "victim," left the Crystal, Hennepin County apartment he shared with his father, defendant PIERRE BARLEE COLLINS, stepmother Y.C., and two baby siblings and took the bus to school in Brooklyn Center. At 4:17 pm, the victim's school bus pulled into the parking lot and the victim said, "There's my dad." Then he said, "Oh, my uncle's here." The bus dropped him off. Rather than go to the main door and call his unit to have his stepmother buzz him into the building as was their custom, the victim stayed outside. The victim was captured on several different video cameras and had contact with at least one person not related to his eventual disappearance in the parking lot. Investigation has determined that no one other than the defendant ever saw the victim again. On April 11, 2015, the victim's body was recovered in the Mississippi River in Minneapolis near the intersection of 53rd and Lyndale Avenues North. The condition of his body was consistent with that of a person who had been in the water for several weeks. His feet were bound together with duct tape. A piece of duct tape was wrapped around his torso.

Investigation has revealed that the defendant left his home early on the morning of March 18th and told Y.C. he was going to work. Y.C. was under the impression that the defendant worked as a home health care aide. In fact, the defendant has not been employed for some time and has no apparent income. While the defendant was out of the home that morning, he attended a hearing in Hennepin County Family Court regarding his child support obligation to children from a prior relationship. Y.C. was unaware that the defendant had a court appearance that day.

Records obtained and analyzed regarding the use and location of the defendant's cell phone show that at 9:06 am on March 18th the defendant left court and the downtown area and headed north on I-94. At 9:10, he was in the area of West River Road and 66th Avenue North in Minneapolis. He then reversed course and headed south to the area of 53rd-56th and Lyndale Avenues North where he was from 9:22 to 9:29 am. This is the area along the river from which the victim's body was recovered. Records for the preceding 30 days show that the defendant's phone never registered to that area before and the defendant is not known to have any particular reason for being in this area on this or any other day.

At 12:04 pm, the defendant was at an Aldi Market in Crystal; store video shows him in a dark shirt.

At 1:39 pm, the defendant returned to the Crystal apartment.

At 4:17 pm, the victim's school bus pulled into the lot and video shows the victim say he saw his father. At this time, the defendant's silver Volkswagen Jetta was parked near the entrance to the parking lot where it could be seen from an approaching school bus. The parking space is not near the closer entrances to the defendant's apartment and was not a space regularly used by the defendant. While the Jetta was in that parking space, defendant's phone records show he was in the apartment. At 4:20, video shows the victim standing at the side of the Jetta in the parking lot. At 4:22, the victim is seen walking from the direction of the Jetta to the front door of the apartment building where he peered inside the window; he never entered the building. At this time, phone records show the defendant to still be in or near the apartment. At 4:23, the victim walked away from the door and back in the direction of the Jetta. In so doing, he stepped in front of a moving car whose occupants said something to the victim about not running in a parking lot and victim said he was sorry. In total, the victim was in the parking lot of his apartment building 6-7 minutes and never went inside.

At 4:25 pm, the defendant's cell phone shows he had left the apartment was near the Jetta.

At 4:26 pm, the Jetta pulled out of the parking lot and video shows it traveling north on Highway 81. The driver's window was open and an arm with a white sleeve is visible.

At 4:42 pm, the defendant was in the area of Lyndale and 55th Avenues North, his phone registering on the exact Wi-Fi instrument that it registered on at 9:27 am that morning.

From 4:42 until 5:41 pm the phone registers no voice or SMS activity; it was either turned off or in "airplane mode."

While the defendant's phone was off, he was detected on video at Cub Foods in Brooklyn Center at 5:17 pm wearing a white shirt. At 5:18 he checked his account balance on an ATM at TCF Bank. He left Cub at 5:23 pm.

At 5:41, the defendant's phone was turned back on. He called Y.C. who told him the victim did not come home after school. The defendant, traveling from Cub back to the apartment, called the school bus company.

At 5:51 pm, the defendant arrived home to the apartment. Y.C. told police the defendant came in in tears which she found odd because he rarely cries and the victim had only been missing a short time. Video shows the defendant leaving the apartment at 6:03 pm in the Jetta after changing out of his white shirt into a dark shirt and putting on a black baseball cap. At 6:24 pm, he returned to the building in the Jetta.

At 6:27 pm, the defendant called 911 from his cell phone at the apartment and reported the victim missing. He told police that after learning the victim had not returned home, he called the bus company and the operator told him the bus driver heard the victim say his uncle was there upon getting dropped off. He said he knew of no uncle who would be picking up the victim and that he had no idea who he would have been referring to. The defendant and Y.C. claimed no knowledge of the victim's whereabouts, and the defendant said he was not present when the bus dropped off the victim.

Police have interviewed the defendant several times. He denied ever being at the river and had no explanation for why his phone was tracked there. Police noted several key inconsistencies with the defendant's account of March 18th including what he did that day, where he was, what routes he took while driving, what he had been wearing, and even who his family members and siblings were.

Y.C. has also been interviewed several times. She told police that sometime around 4:15 pm on March 18th, the defendant was watching TV and suddenly got up and told her he had to go to the bank and the store. He then left the apartment and did not return until after she told him that the victim hadn't come home from school.

The victim's school backpack has not been located.

Investigation also revealed that the defendant had two life insurance policies on the victim. One is through Globe Insurance and has coverage of \$30,000. On March 16th, two days before the victim was last seen, the defendant made a payment on that policy. Also on that date he made a phone call to Globe, which was recorded. The defendant asked about raising the amount of coverage from \$30,000 to \$50,000. The second policy is through a different company and covers the defendant for \$100,000 and his dependents for \$20,000 each.

The defendant and Y.C. have considerable financial obligations, debt and no current income. Nevertheless,

when the defendant was offered a temporary job on March 17th that was to begin at 4:00 pm on March 18th, he turned down the job and said it was because he was unable to report on that date and time.

On April 13, 2015 police spoke to the defendant. He said that if they had enough, they should come and get him.

The defendant is 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	Julie Severson Police Officer 4141 Douglas Drive N Crystal, MN 55422 Badge: 331	Electronically Signed: 04/14/2015 12:02 PM
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Subscribed and sworn to before the undersigned.

Notary Public or Judicial Official	Derrick Hacker, Peace Officer License Number: 15020, Hennepin County, Minnesota. My license expires: 03/09/2016 Police Lieutenant 4141 Douglas Drive N Crystal, MN 55422	Electronically Signed: 04/14/2015 12:06 PM
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Being authorized to prosecute the offenses charged, I approve this complaint.

Prosecuting Attorney	Amy Sweasy 300 S 6th St Minneapolis, MN 55487 (612) 348-5550	Electronically Signed: 04/14/2015 12:01 PM
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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 401 Fourth Avenue S, Minneapolis, MN 55415 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: No Contact with Witnesses; No Contact with Minors/Males/Females under age of: Under 18; No Possession of Weapons; Other: Defendant has already surrendered passport

This complaint is issued by the undersigned Judge as of the following date: April 14, 2015.

Judicial Officer

Juan Hoyos
Judge

Electronically Signed: 04/14/2015 12:13 PM

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

**COUNTY OF HENNEPIN
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Pierre Barlee Collins

Defendant

Clerk's Signature or File Stamp:

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: