

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 15A51813
Court File No. 27-CR-15-35615

State of Minnesota,
Plaintiff,

COMPLAINT
Warrant

vs.

JAIME EDWARD MCCLELLAN DOB: 07/24/1984

8104 Zane Avenue North 104
Brooklyn Park, MN 55443

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 - 3rd Degree - Sell/Give/Distribute Controlled Substance - Schedules 1 & 2

Minnesota Statute: 609.195(b), with reference to: 609.195(b)

Maximum Sentence: 25 YEARS AND/OR \$40,000

Offense Level: Felony

Offense Date (on or about): 10/23/2015

Control #(ICR#): 15017478

Charge Description: That on or about 10/23/2015, in Hennepin County, Minnesota, JAIME EDWARD MCCLELLAN , did, without intent to cause death, proximately cause the death of victim, a human being, by directly or indirectly and unlawfully selling, delivering, or distributing a controlled substance classified in Schedule I or II.

STATEMENT OF PROBABLE CAUSE

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

That on October 24, 2015, at approximately 9:25 a.m., deputies were dispatched to a residence located at 492 Hamel Road in Medina, Hennepin County, on a medical call. Upon arrival, deputies learned an identified adult male, hereafter victim, was deceased in his bedroom. Deputies spoke with victim's girlfriend, hereafter Witness #1, and learned victim went to bed the prior evening and was found lying on the bedroom floor unresponsive this morning. Deputies located spoons, syringes, heroin, heroin residue, and heroin packaging within victim's residence. Victim was pronounced dead at the scene. An autopsy confirmed victim died as a result of a heroin overdose.

Deputies obtained a search warrant and seized two computers and an I-Phone identified as belonging to victim. Deputies conducted a forensic search of victim's computers and I-Phone. Deputies noted text dialogue with an identified contact, hereafter Witness #2, in the months of August-October 2015 that were consistent with narcotics transactions. Specifically, these text communications established victim obtained heroin with Witness #2. Deputies were subsequently able to identify Witness #2.

On October 30, 2015, deputies spoke with Witness #2. Witness #2 reported victim was a close friend and they purchased and injected heroin together. Witness #2 identified their supplier as "Red," an individual deputies subsequently identified as JAIME EDWARD MCCLELLAN, hereafter defendant. Witness #2 provided a physical description of defendant and identified vehicles defendant drives. Witness #2 reported he and victim purchased heroin from defendant and did so on the night of October 23, 2015. Witness #2 provided details of these heroin transactions with defendant. Witness #2 reported he warned victim to be careful while using the heroin they obtained from defendant on the night of October 23, 2015 as the heroin was "good stuff" (i.e. potent). Witness #2 indicated he and victim would contact defendant via telephone and indicated defendant's contact information was located in his cell phone. Deputies obtained Witness #2's cell phone.

Pursuant to search warrant, deputies conducted a forensic examination of Witness #2's cell phone. In the contacts section, deputies located a contact listed as "Red" with two associated telephone numbers. In the text message history, deputies located significant text communications between Witness #2 and "Red." The substance of these text communications was consistent with narcotics transactions.

Deputies obtained a photograph of defendant and showed it to Witness #2. Witness #2 positively identified the photograph as the person he knew as "Red" and as the person he and victim purchased heroin from on October 23, 2015.

During subsequent investigation, deputies learned defendant was a suspect in an on-going Anoka County death investigation wherein another individual died after injecting heroin purchased from defendant. Deputies began working with Anoka County law enforcement. That in November- December 2015, deputies used confidential reliable informants to make a number of controlled heroin purchases from defendant. During many of these transactions, defendant would be present but use "runners" to deliver the heroin. Deputies noted the heroin obtained during these controlled buys was packaged similar to the heroin packaging found in victim's residence.

That on December 16, 2015, deputies located and arrested defendant. Defendant was found to be in possession of heroin (15 grams) and a large amount of cash. During a post-Miranda interview, defendant denied knowing victim or Witness #2. Deputies advised defendant they had phone records detailing

volumes of communications between defendant and Witness #2. Defendant still denied knowing Witness #2.

Deputies executed a search warrant at defendant's addresses in Maple Grove and Elk River. During the searches, deputies recovered two handguns and packaging materials consistent with those found in victim's residence and those recovered during the above-described controlled buys.

Defendant was charged in Anoka County with Controlled Substance Crime in the First Degree. Heroin is a Schedule I controlled substance. At present, defendant remains in custody on that charge. Accordingly, your complainant hereby requests this complaint issue by warrant rather than by summons.

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

David Hall
Patrol Officer
350 S 5th St
Minneapolis, MN 55415

Electronically Signed:
12/21/2015 11:02 AM
Hennepin County, Minnesota

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

Prosecuting Attorney

Darren Borg
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
12/21/2015 10:59 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 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: \$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: December 21, 2015.

Judicial Officer Michael K. Browne Electronically Signed: 12/21/2015 04:22 PM
 Judge

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

<p>COUNTY OF HENNEPIN STATE OF MINNESOTA</p> <p>State of Minnesota Plaintiff vs. JAIME EDWARD MCCLELLAN Defendant</p>	<p><i>LAW ENFORCEMENT OFFICER RETURN OF SERVICE</i> <i>I hereby Certify and Return that I have served a copy of this Warrant upon the Defendant herein named.</i></p> <p>Signature of Authorized Service Agent:</p>
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