

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 18A14684
Court File No. 27-CR-18-29562

State of Minnesota,
Plaintiff,

COMPLAINT
Order of Detention

vs.

NICHOLAS ALLAN YOUNG DOB: 04/27/1990

1918 PARK AVE S
#34
MINNEAPOLIS, MN 55404

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): 12/01/2018

Control #(ICR#): 18395664

Charge Description: That on or about 12/1/2018, in Hennepin County, Minnesota, NICHOLAS ALLAN YOUNG, 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.

STATEMENT OF PROBABLE CAUSE

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

On December 1, 2018 at approximately 5:20 PM, Minneapolis police and emergency medical services (EMS) responded to a multi-unit residential building in Minneapolis, Hennepin County, Minnesota on a report of an unresponsive man. EMS attempted life-saving measures on the forty-five-year-old man ("the victim"), but he was pronounced deceased on the scene.

While first responders attended to the victim, a man, later identified as Nicholas Allan Young, DOB: 04/27/1990, Defendant herein, arrived on the scene. Defendant had blood on his hands and his head and what appeared to be a fresh contusion on his left eye. Defendant told an officer that the victim had punched Defendant in the eye, and they began to fight and the victim became unconscious. Defendant claimed he attempted CPR on the victim and told someone else to call 911.

A witness who lives in the building told police that he saw Defendant in the hallway on the afternoon of December 1. Defendant told the witness that he "got into it" with the victim, and he did not think the victim was breathing. Defendant asked the witness to come to Defendant's apartment where Defendant gave the witness two laptops to "hold onto" for Defendant because Defendant thought he was in trouble. The witness reported that he thought there had been some tension or disagreement between the victim and Defendant recently.

Defendant was arrested and transported to the Hennepin County jail. In a Mirandized interview with investigators, Defendant told them that he has been friends with the victim for several years. Approximately 8 months ago, Defendant said he purchased a laptop which he then gave to the victim with an agreement that the victim would pay him monthly for it. On December 1, Defendant said he went to the victim's apartment to collect the money owed that month for the laptop. Defendant reported that the victim didn't have the money, so Defendant demanded the laptop back. Defendant said the victim then initiated a physical altercation, during which Defendant claimed he "blacked out." Defendant said he awoke next to the victim who was unresponsive and attempted CPR. Defendant said he left the victim's room and, when he returned, paramedics were on the scene.

Preliminary information from the medical examiner's office indicates that the victim sustained injuries to his face and head as well as a fractured hyoid bone and thyroid cartilage.

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 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

Robert Dale
Sergeant
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 1414

Electronically Signed:
12/04/2018 12:10 PM
Hennepin County, Minnesota

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

Prosecuting Attorney

Paige L Starkey
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
12/04/2018 12:08 PM

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: December 4, 2018.

Judicial Officer

Tamara Garcia
District Court Judge

Electronically Signed: 12/04/2018 12:16 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.

NICHOLAS ALLAN YOUNG

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: NICHOLAS ALLAN YOUNG
DOB: 04/27/1990
Address: 1918 PARK AVE S
#34
MINNEAPOLIS, MN 55404

Alias Names/DOB:

SID: MN08BF4452

Height:

Weight:

Eye Color:

Hair Color:

Gender: MALE

Race: White

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: Yes

Driver's License #:

SILS Person ID #: 754938

SILS Tracking No. 3069623

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	12/1/2018	609.19.2(1) Murder - 2nd Degree - Without Intent - While Committing a Felony	Felony	H2852		MN0271100	18395664
	Penalty	12/1/2018	609.223.1 Assault-3rd Degree-Substantial Bodily Harm	Felony	H2852		MN0271100	18395664
	Penalty	12/1/2018	609.19.2(1) Murder - 2nd Degree - Without Intent - While Committing a Felony	Felony	H2852		MN0271100	18395664