

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 19A11807  
Court File No. 27-CR-19-23718

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**State of Minnesota,**  
Plaintiff,

**COMPLAINT**  
Warrant

vs.

**HARLIN ST JOHN DOB: 08/11/1983**

2504 SOUTH 11TH AVE  
2 FLOOR  
MINNEAPOLIS, MN 55404

Defendant.

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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: Damage to Property - 1st Degree - Value Reduced Over \$1000**

Minnesota Statute: 609.595.1(4), with reference to: 609.595.1

Maximum Sentence: 5 YEARS AND/OR \$10,000

Offense Level: Felony

Offense Date (on or about): 09/18/2019

Control #(ICR#): 19283066

Charge Description: That on or about 9/18/2019, in Hennepin County, Minnesota, HARLIN ST JOHN intentionally caused damage to physical property belonging to victim, without victim's consent and such damage reduced the value of the property by more than \$1,000 as measured by the cost of repair and/or replacement.

**COUNT II**

**Charge: Damage Property - 2nd Degree - Because of Bias**

Minnesota Statute: 609.595.1a(a), with reference to: 609.595.1a(a)

Maximum Sentence: 1 YEAR AND A DAY AND/OR \$3,000

Offense Level: Felony

Offense Date (on or about): 09/18/2019

Control #(ICR#): 19283066

Charge Description: That on or about 9/18/2019, in Hennepin County, Minnesota, HARLIN ST JOHN intentionally damaged physical property belonging to victim without victim's consent because of the victim's actual or perceived race, color, religion, sex, sexual orientation, disability, age or national origin.

**COUNT III**

**Charge: Damage to Prop-3rd Deg-Bias-Value Reduced \$1-\$500**

Minnesota Statute: 609.595.2(b), with reference to: 609.595.2(b)

Maximum Sentence: 1 YEAR AND/OR \$3,000

Offense Level: Gross Misdemeanor

Offense Date (on or about): 09/18/2019

Control #(ICR#): 19283066

Charge Description: That on or about 9/18/2019, in Hennepin County, Minnesota, HARLIN ST JOHN intentionally caused damage to victim's physical property without victim's consent because of victim's actual or perceived race, color, religion, sex, sexual orientation, disability as defined in Minn. Stat. 363A.03, age or national origin, and the damage reduced the value of the property by \$450, not more than \$500.

## STATEMENT OF PROBABLE CAUSE

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

On September 18, 2019, at approximately 4 a.m., officers responded to a property damage report near the intersection of East Franklin Avenue and 24th Avenue South in the City of Minneapolis, Hennepin County, Minnesota. The initial call reported that a white male was throwing rocks through business windows.

Officers responded and observed the damage. Several large double pane windows covering business storefronts were shattered, with gaping holes in the center. Officers spoke with a witness, identified in police reports, who lives in the apartments above the row of businesses. She told officers that she heard glass breaking. When she looked out to see what happened, she saw a white male with a rock in his hand, throwing rocks at different businesses. Officers obtained and reviewed surveillance footage from the area showing the male throwing rocks at the businesses.

The following day, Hennepin County Security officers working on the Public Service Level of the Hennepin County Government Center recognized a male matching the description of the suspect, including the same clothing from the night before. Officers approached the male and though he initially gave them the name "Harlin Morris," officers eventually were able to identify him as HARLIN ST. JOHN, Defendant herein. While he spoke with officers, Defendant stated "I broke those windows and I will pay for them." Defendant was taken into custody, and was later released pending additional investigation.

Through follow-up investigation, officers identified a total of seven victim business owners, fully identified in police reports. Each business, located in the area of East Franklin Avenue, suffered broken windows overnight on September 18. Officers learned that the damage caused by Defendant is estimated to be in excess of eight thousand dollars. Victim 1 estimated the cost of replacement of the windows in his business to be \$5,400.00. Victim 2 estimated the cost of repair of the windows in her business to be \$2,600.00. Victim 3 provided a bill for repair to the windows of his business in the amount of \$450.00.

In a post-Miranda statement, Defendant admitted that he broke the windows. Defendant claimed that he broke them in retaliation for someone shooting at his family members, and then clarified that he believed that the people who shot at his family members were Somali because he couldn't think of anyone else who would. Defendant told officers that "Somali people are selling meth and heroin to Native people," and that he hates "the Somalis." Defendant also said he believes all of "the Somalis" are involved in some way or another, they are all connected to drug dealing and shooting, and with them all being connected he just directed his hate at "the Somalis" he knew.

The State is seeking an upward sentencing departure in this case, due to Defendant's selection of the victims, in whole or in part, based on the victims' actual or perceived race, ethnicity, religion, and/or national origin.

Based on Defendant's comments to law enforcement and demeanor during his interview with law enforcement, he is believed to be a threat to public safety, specifically the Somali community. Your Complainant therefore requests this complaint issue as a warrant.

## 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**

Nathan Johnson  
Police Officer  
350 S 5th St  
Minneapolis, MN 55415-1389  
Badge: 3465

Electronically Signed:  
09/24/2019 04:09 PM  
Hennepin County, Minnesota

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

**Prosecuting Attorney**

Morgan Lee Miller  
Assistant Hennepin County  
Attorney  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
09/24/2019 03:59 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 the address listed on the attached court summons 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: \$10,000.00

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, 2019.

**Judicial Officer**

M. Jacqueline Regis  
District Court Judge

Electronically Signed: 09/24/2019 04:11 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.

**HARLIN ST JOHN**

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:** HARLIN ST JOHN  
**DOB:** 08/11/1983  
**Address:** 2504 SOUTH 11TH AVE  
2 FLOOR  
MINNEAPOLIS, MN 55404

**Alias Names/DOB:** Harlin NMN St John DOB: 8/11/1983  
**SID:**  
**Height:**  
**Weight:**  
**Eye Color:**  
**Hair Color:**  
**Gender:** MALE  
**Race:** American Indian  
**Fingerprints Required per Statute:** Yes  
**Fingerprint match to Criminal History Record:** No  
**Driver's License #:**  
**SILS Person ID #:** 867552  
**SILS Tracking No.** 3129254  
**Alcohol Concentration:**

## STATUTE AND OFFENSE GRID

<b>Cnt Nbr</b>	<b>Statute Type</b>	<b>Offense Date(s)</b>	<b>Statute Nbrs and Descriptions</b>	<b>Offense Level</b>	<b>MOC</b>	<b>GOC</b>	<b>Controlling Agencies</b>	<b>Case Numbers</b>
1	Charge	9/18/2019	609.595.1(4) Damage to Property - 1st Degree - Value Reduced Over \$1000	Felony	P111H		MN0271100	19283066
	Penalty	9/18/2019	609.595.1 Damage to Property-1st Degree	Felony	P111H		MN0271100	19283066
2	Charge	9/18/2019	609.595.1a(a) Damage Property - 2nd Degree - Because of Bias	Felony	P4119		MN0271100	19283066
	Penalty	9/18/2019	609.595.1a(a) Damage Property - 2nd Degree - Because of Bias	Felony	P4119		MN0271100	19283066
3	Charge	9/18/2019	609.595.2(b) Damage to Prop-3rd Deg-Bias-Value Reduced \$1-\$500	Gross Misdemeanor	P5119		MN0271100	19283066
	Penalty	9/18/2019	609.595.2(b) Damage to Prop-3rd Deg-Bias-Value Reduced \$1-\$500	Gross Misdemeanor	P5119		MN0271100	19283066