

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 22A04702
Court File No. 27-CR-22-8318

State of Minnesota,

Plaintiff,

vs.

COLLEEN PURIFICACION LARSON DOB: 01/06/1998

801 CLAYLAND ST.
ST PAUL, MN 55104

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 -1st Degree - Premeditated

Minnesota Statute: 609.185(a)(1), with reference to: 609.11.5(a), 609.17.4(1), 609.05.1, 609.05.2, 609.185

Maximum Sentence: LIFE

Offense Level: Felony

Offense Date (on or about): 04/20/2022

Control #(ICR#): 22082640

Charge Description: That on or about April 20, 2022, in Hennepin County, Minnesota, COLLEEN PURIFICACION LARSON, acting alone or intentionally aiding and abetting another, attempted to cause the death of Victim, a human being, with premeditation and with intent to effect the death of that person, or another, with the use of a firearm.

Minimum Sentence: 3 YEARS

STATEMENT OF PROBABLE CAUSE

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

On or about April 20, 2022, at approximately 7:33 p.m., officers responded to a shooting at a supervised parenting center located on the 3000 block of University Avenue in Minneapolis, Hennepin County, Minnesota. When officers arrived in the parking lot, they observed Victim, a 33-year old female, with gunshot wounds to the right side of her neck and right forearm. A witness was present, helping Victim by using her coat to try to stop the bleeding.

The witness stated that the shooting happened in the parking lot. She saw the suspect run up behind Victim and put an object to Victim's neck, then she heard "two bangs." The suspect ran away as Victim staggered and grabbed her neck. The witness pointed to where the shooting occurred, and officers observed three .380 discharged cartridge cases and three .380 live rounds on the ground.

First responders took Victim to HCMC. Victim suffered a through and through gunshot to her arm, and the gunshot to her neck caused numerous internal injuries, including a perforated lung. She remains hospitalized, but it appears she will survive. When police attempted to interview her at the hospital, she could not communicate verbally due to her injuries but was able to provide information in writing.

Officers learned that Victim was at the supervised parenting center to pick up her 5-year-old child whom she shares with Defendant TIMOTHY AMACHER (03/20/1981), and that AMACHER and the child were inside the building when Victim was shot. Family court orders restrict AMACHER'S contact with the child to supervised visitation only and prohibit any contact between AMACHER and Victim.

Employees at the parenting center who are familiar with the family history of Victim and AMACHER told police that the shooter might be AMACHER's girlfriend, Defendant COLLEEN PURIFICACION LARSON (01/06/1998).

Officers obtained surveillance video from the parking lot. It shows Victim sitting in her vehicle waiting to pick up her son. A 2022 black Dodge Ram without a license plate arrives and parks south of the parking lot. A female, later identified as LARSON, wearing all black, a hood, gloves, and a medical mask, gets out of the truck and conceals herself behind a fence until Victim gets out of her vehicle. As Victim approaches the facility on foot, LARSON, holding a firearm, runs up behind Victim. The video shows LARSON raising the gun up at Victim, but the shooting happens just outside the camera view. Further examination of the video revealed that, approximately six minutes before the shooting, LARSON appears to be scouting out the scene by slowly driving, and later walking, by the parking lot.

Investigators learned that AMACHER owns four vehicles and had purchased a 2022 black Dodge Ram in January of this year.

Officers interviewed AMACHER out of custody that evening. He then spent a large portion of the interview describing how he is a victim of family court, MPD, and Victim's behavior. When asked if he had any idea who would have shot Victim, AMACHER said "absolutely." He claimed it must be related to Victim's job as a forensic scientist for the Minneapolis Police Department.

AMACHER was not arrested and officers drove him to the parenting center parking lot to retrieve the vehicle he had driven there, a Jeep. In the parking lot, an investigator asked him what vehicles he owns. AMACHER did not mention the Dodge Ram when talking about his vehicles.

Officers obtained a search warrant for the GPS data of the Dodge Ram registered to AMACHER. Coupled with AMACHER and LARSON's cell phone location data, officers were able to determine that AMACHER switched vehicles with LARSON at his place of business in White Bear Lake approximately three hours before the shooting. AMACHER then drove the Jeep to the parenting center as LARSON drove the Dodge Ram to their home in St. Paul, then drove directly to the parenting center. After the shooting, she drove the Dodge Ram back to the St. Paul home using a similar route. Surveillance footage along the route captured a female matching LARSON's description driving the truck. It also shows that the truck did not have a license plate at that time.

In an interview with investigators on April 28, 2022, Officers confronted AMACHER with stills from the surveillance footage showing his Dodge Ram. AMACHER denied that it was his truck because it did not have two decals on it. Officers had surveilled AMACHER's truck at his workplace parking lot on April 21, 2022, the day after the shooting, and at that time, the truck had a temporary license plate and the decals described by AMACHER, showing they were put on the truck after the shooting.

Investigators also learned that AMACHER applied for a new personalized license plate for the truck on April 19, 2022, the day before the shooting. He claimed in his April 28 interview that he was requesting the new plate on April 19 because his old one was stolen. DVS records show this is not true. AMACHER also stated that he immediately put the new license plate on the truck and never took it off. However, surveillance from earlier in the day on April 20 (before LARSON took custody of the truck) shows AMACHER driving the truck without a license plate.

Also on April 28, 2022, officers executed a search warrant at Defendants' residence in St. Paul and recovered multiple firearms, but no .380. However, they found several .380 discharged cartridge cases. The Hennepin County Crime Lab later determined that these were fired from the same gun as the .380 discharged cartridge cases at the scene of the shooting. In the April 28 interview with AMACHER, when asked what guns he owns, he at first did not mention a .380. When pressed, he said he used to have two .380 pistols.

Investigators also interviewed LARSON on April 28, 2022. She denied being involved and said she was at her home in St. Paul at the time of the shooting.

Investigators learned that Victim and AMACHER's relationship involved domestic violence and extreme harassment and stalking behavior by AMACHER over the last few years. Between 2019 and 2022, AMACHER made ten reports to police that Victim and her boyfriend were abusing the child. All the reports were deemed unfounded. During one investigation, the child told a social worker that AMACHER had instructed him to lie about being abused.

Investigators learned that Victim had full custody of the child. Court records from March of 2022 show that AMACHER'S visitation had been further restricted to supervised contact only, and he had been ordered to pay visitation costs.

Investigators also learned that in February of 2022, AMACHER propositioned one of his friends to kill Victim in exchange for \$50,000. Investigators corroborated that this conversation occurred through interviews of multiple witnesses and examination of phone records.

Both Defendants are in custody. The sophistication of Defendants' crimes, as well as AMACHER'S affinity for firearms, suggest that, if released, both Defendants would pose a significant risk to Victim and the public. As such, your complainant requests high bail be set on both Defendants.

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

Scott A Olson
Sergeant
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 5315

Electronically Signed:
05/02/2022 11:55 AM
Hennepin County, olsonsa1

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

Prosecuting Attorney

Patrick Lofton
Assistant County Attorney
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
05/02/2022 11:55 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 as directed in the Notice of Hearing before the above-named court 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: \$1,000,000.00
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: May 2, 2022.

Judicial Officer

Julia Dayton Klein
District Court Judge

Electronically Signed: 05/02/2022 12:02 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.

COLLEEN PURIFICACION LARSON

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: COLLEEN PURIFICACION LARSON
DOB: 01/06/1998
Address: 801 CLAYLAND ST.
ST PAUL, MN 55104

Alias Names/DOB:

SID: MN22DG4207

Height:

Weight:

Eye Color:

Hair Color:

Gender: FEMALE

Race: White

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: Yes

Driver's License #:

SILS Person ID #: 904604

SILS Tracking No. 3275115

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	4/20/2022	609.185(a)(1) Murder -1st Degree - Premeditated	Felony	H1H12	A	MN0271100	22082640
	Modifier	4/20/2022	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	H1H12	A	MN0271100	22082640
	Penalty	4/20/2022	609.185 Murder - 1st Degree	Felony	H1H12	A	MN0271100	22082640
	Modifier	4/20/2022	609.05.1 Liability for Crimes of Another-Intentional	No-Level	H1H12	A	MN0271100	22082640
	Penalty	4/20/2022	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H1H12	A	MN0271100	22082640
	Penalty	4/20/2022	609.17.4(1) Anticipatory Crimes-Attempts-Penalty-20 Years if Life for Intended	Felony	H1H12	A	MN0271100	22082640