

State of Minnesota  
County of Dakota

District Court  
1st Judicial District

Prosecutor File No. CA-2018-01916  
Court File No. 19HA-CR-18-1951

---

**State of Minnesota,**

Plaintiff,

vs.

**ROMAN ALEXANDER ADAMS DOB: 09/25/1999**

11967 87th PI N  
Maple Grove, MN 55369

Defendant.

**COMPLAINT**

Warrant

---

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: Assault in the 3rd Degree (Substantial Bodily Harm)**

Minnesota Statute: 609.223.1

Maximum Sentence: 0-5 Years and/or \$3,000.00 - \$10,000.00

Offense Level: Felony

Offense Date (on or about): 07/31/2018 to 07/31/2018

Control #(ICR#): 18004159

Charge Description: On or about July 31, 2018, in the County of Dakota, Minnesota, ROMAN ALEXANDER ADAMS, did assault another and inflict substantial bodily harm.

## STATEMENT OF PROBABLE CAUSE

8/1/2018 02:33:56 PM  
Dakota County, MN

Your Complainant is a licensed peace officer with the Apple Valley Police Department. In that capacity, I have reviewed the police reports and believe the following to be true.

On July 31, 2018, at approximately 1:35 p.m., officers of the Apple Valley Police Department were dispatched to the Apple Valley Aquatic Center located in the City of Apple Valley, Dakota County, Minnesota, for a medical call involving an 8-year-old child with a broken leg. Upon reaching the scene, officers observed the child lying on the concrete sidewalk below a waterslide.

Through investigation it was determined that the child had been standing on the platform at the top of the waterslide when a male picked the child up and threw the child over the railing encircling the platform. The platform is 28.1 feet from the ground; and the top of the railing is 31.9 feet from the ground. The male who threw the child was located at the waterpark and was identified as Roman Alexander Adams, DOB: 09/25/1999 ("Defendant").

While at the waterpark, an officer questioned Defendant as to what happened. Defendant stated that he was waiting in line to use the slide and that it was taking a long time. Defendant admitted that he threw the child from the platform. Defendant was later interviewed by a detective of the Apple Valley Police Department during which he stated that the line was taking too long so he "pushed" the child over the railing and saw him fall.

The child was admitted to a hospital. It was determined that the child sustained numerous fractures to both his feet, a broken femur in one leg, and shattered bones in a shoulder.

**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, subs. 1, 2.

**Complainant**

Nick Francis  
Captain  
7100 147th St W  
Apple Valley, MN 55124  
Badge: 903

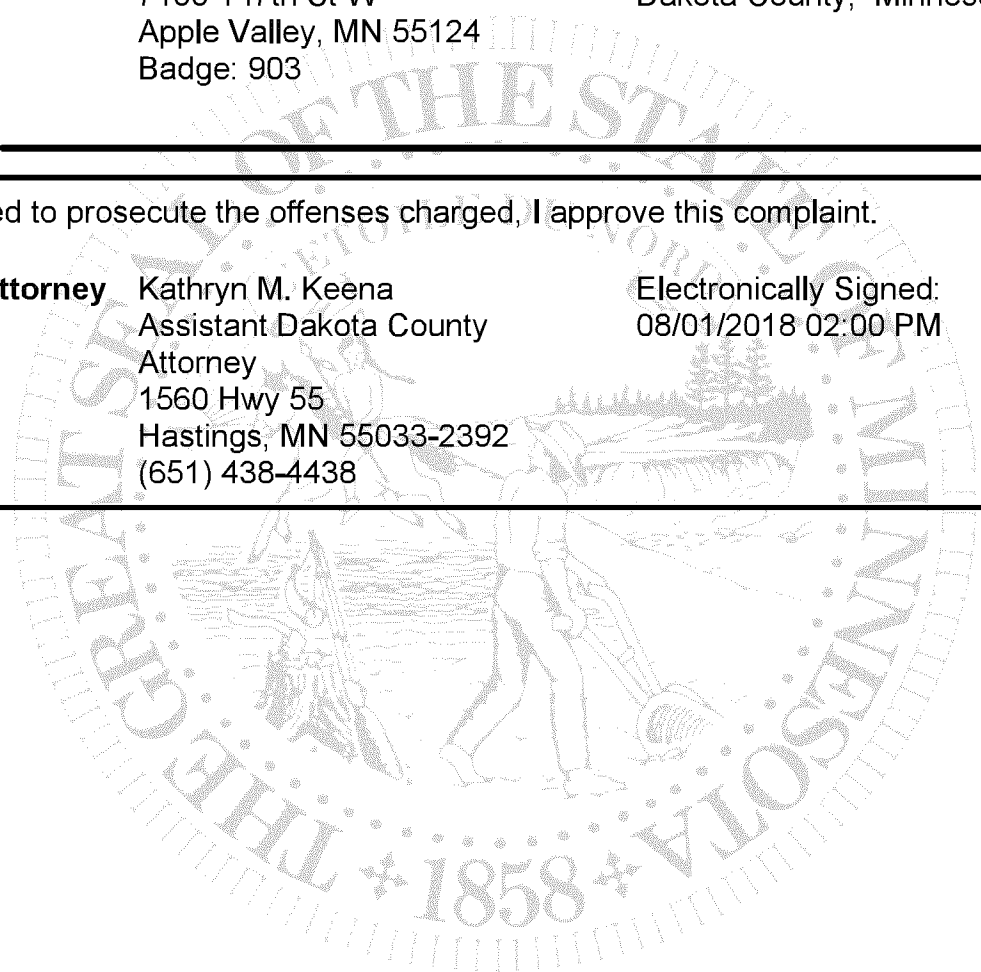
Electronically Signed:  
08/01/2018 02:04 PM  
Dakota County, Minnesota

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

**Prosecuting Attorney**

Kathryn M. Keena  
Assistant Dakota County  
Attorney  
1560 Hwy 55  
Hastings, MN 55033-2392  
(651) 438-4438

Electronically Signed:  
08/01/2018 02:00 PM



**FINDING OF PROBABLE CAUSE**

8/1/2018 02:33:56 PM  
Dakota County, MN

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 1560 W Highway 55 Dakota County Judicial Center, Hastings, MN 55033 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: \$50,000.00

Conditions of Release: No contact with minors; Excluded from Apple Valley Aquatic Center and all other similar type facilities; No possession of firearms or other dangerous weapons; Remain law abiding; Make all future court appearances; Keep court informed of address

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: August 1, 2018.

Judicial Officer

Michael Baxter  
District Court Judge

Electronically Signed: 08/01/2018 02:27 PM

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

**COUNTY OF DAKOTA  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**Roman Alexander Adams**

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: