

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 26A01295
Court File No. 27-CR-26-5757

State of Minnesota,
Plaintiff,

COMPLAINT
Summons

vs.

JADYN MARIE LITTLE DOB: 01/16/2003

2528 Highway 100 S
#212
St. Louis Park, MN 55416

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: Contributes to need for child protection or services
Minnesota Statute: 260C.425.1(a), with reference to: 260C.425.1(a)
Maximum Sentence: 364 DAYS AND/OR \$3,000
Offense Level: Gross Misdemeanor
Offense Date (on or about): 03/15/2025
Control #(ICR#): 25002843

Charge Description: That between 3/15/2025 and 5/26/2025, in Hennepin County, Minnesota, Jadyne Marie Little, by act, word, or omission encouraged, caused or contributed to the need for child protection or services.

STATEMENT OF PROBABLE CAUSE

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

On April 2, 2025, Hennepin County Child Protection Services (CPS) received a report expressing concern for the safety of a 2-year-old child, Victim herein, while in the care of his mother, JADYN LITTLE (DOB 1/16/03), Defendant herein. The reporting party, Victim's father, reported that on 3/31/25, Victim arrived at his home with three burn marks on his arm, a black eye, and a bruise on the top of his head. Victim's father stated that his 4-year-old daughter, Victim's sister, told him that Defendant's boyfriend, ALEXANDER COLE HOUSTON (DOB 3/13/97), had hit Victim. Victim's father further reported that he asked Defendant about the injuries and she, too, stated HOUSTON had hit Victim.

On April 3, 2025, Victim was seen at the Center for Safe and Healthy Children, where it was determined that his injuries were indicative of child abuse. During the examination, Victim's sister told the doctor that Victim's father had struck Victim. Based on this, a new CPS report was made.

St. Louis Park police began investigating and, along with CPS, followed up with Defendant. Defendant provided conflicting information about the dates of Victim's injuries but ultimately stated the injury to Victim's forehead was sustained prior to his father watching him, the burn marks were sustained while in HOUSTON'S care on 3/15/25, the black eye was sustained when Victim fell at the park while in HOUSTON'S care on 3/15/25, and the mark on Victim's right cheek was sustained while Victim was again in HOUSTON'S care at the park on 3/21/25.

On April 8, 2025, Victim's sister was taken to CornerHouse for a forensic interview; however, she did not want to stay in the interview room and kept asking for Defendant, so the interview was terminated.

On May 26, 2025, CPS received another report expressing concerns for the physical abuse of Victim after Victim was seen in the emergency room at St. John's Hospital with bruising and swelling around both eyes and his left eye swollen shut. Defendant reported that Victim's injuries occurred on 5/24/25 when Victim's sister hit him with a toy that she said weighed approximately fifteen pounds. Hospital staff noted that it seemed unlikely Victim's 4-year-old sister would be able to lift a 15-pound toy with enough force to cause the bruising on Victim's face, and that they suspected Victim's injuries were not consistent with Defendant explanation.

St. Louis Park police and CPS again began investigating. CPS spoke to Defendant, who stated Victim's sister had struck Victim three times with a unicorn toy. CPS was able to locate a toy matching the description Defendant provided online and Defendant confirmed it was the same toy but a different color. The toy specifications indicated it was made of plastic and weighed approximately two pounds, not fifteen.

On May 27, 2025, Victim was seen at Midwest Children's Resource Center (MCRC). The MCRC doctor performing the examination found Victim had extensive ecchymosis (bruising/bleeding under the skin) that was likely the result of a large subgaleal hemorrhage (bleeding between the skull and scalp). The doctor concluded that subgaleal hemorrhages are traumatic injuries that may be caused by several types of trauma, but that it was implausible that Victim's injuries resulted from his 4-year-old sister hitting him with a toy, even if she hit him multiple times.

On May 30, 2025, Victim's sister was again taken to CornerHouse for a forensic interview. She stated that she lives with her "mommy," but when asked to talk more about her mother, she stated, "I can't." She was then asked about her brother, and she stated that she can't talk about family members.

Defendant's cellphone was obtained pursuant to a search warrant and was physically searched and forensically duplicated. Police observed that Defendant had deleted 7,747 text messages between herself and HOUSTON; however, they were able to recover them. Police observed several messages between Defendant and HOUSTON about "marks" or "bruises" on Victim that were exchanged both prior to April 2, 2025, and between May 5 and May 26, 2025 (the dates of the CPS reports). These include exchanges where Defendant tells HOUSTON Victim "can't have any more marks" and that Victim "better not come back with no marks," indicating Victim had suffered several unreported injuries.

Notably, on May 17, 2025, (one week before Defendant reported Victim's sister struck him with the toy), the following exchange was observed:

DEFENDANT - "idk how u could let that happen to [Victim]. He's so miserable dude. Ik my son more then anyone he is not okay."

HOUSTON - "Jadyn you act like I intentionally let anything happen to him on purpose dude like seriously? You think I would've wanted any of this shit to happen absolutely not I feel fucking sick about it. My depression is so fucking bad you just don't know. I stg you have no idea."

DEFENDANT - "U totally said fuck what I gotta say n brought him over there again !!! I do not want him over at ur cousins or by there at the neighbors cuz looo. Look. I gotta miss money just to be here for [Victim] cuz how miserable he is n he needs me. Idk anymore idk if I can trust ts anymore. But if ts happened to ur real son. U would cry to. Ik it. I'm more depressed Alex !!!! He's my kid bro tf I do not like seeing him like this !!! You weren't watching him or that little girl hit him. N i promise u I will be a 12 bitch. Cuz ts isn't ok. Not on u. But the neighbors."

HOUSTON - "Wtf why would you say that to me Jadyn especially rn. Please ur words are so powerful dude they hold so much weight when there being thrown at me & really fucking hurt me more than you know my love.. it hurst me so bad beautiful girl.."

DEFENDANT - "I'll never forgive u for this one especially. Maybe you can't get sober I'll never judge u for that ever cuz idk how addiction feels but I can't keep seein [Victim] like this"

HOUSTON - "Man ur right Jadyn. Ur 1000000% fucking right.. I'm so fucking sorry baby I'm so so so aooooooo sorry my erythang"

DEFENDANT - "Plz quit acting like ts hurts u. If u loved [Victim] u wouldn't have let it happen. You don't love myu kids so stop acting like u do. If I ever had ur kid in my care I'm watching that kid all all times no matter tf what !!!"

In addition, on May 22, 2025, Defendant texted HOUSTON stating, "yeah my gms said it's weird how there's no mark on his nose n sms. She believes me type shii I hate lien to her" ... "Cuz I said [Victim's sister] hit him with toy type shii." Notably, Defendant reported that Victim's sister struck him with the toy on May 24, 2025.

Due to the actions of Defendant, such as continuing to leave Victim in HOUSTON'S care where Victim was repeatedly injured, Child Protection opened an investigation and determined Victim was in need of protection and/or services.

At all relevant times, Victim resided with Defendant at her residence in St. Louis Park, Hennepin County, Minnesota.

Defendant is not in custody.



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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

Allie Dansby
Police Officer
3015 Raleigh Ave S
St Louis Park, MN 55416
Badge: 311

Electronically Signed:
03/03/2026 05:34 PM
Hennepin County, Minnesota

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

Prosecuting Attorney

Evan Powell
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
03/03/2026 04:12 PM

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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: \$0.00

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: March 4, 2026.

Judicial Officer

Jennifer Olson

Electronically Signed: 03/04/2026 10:28 AM

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

**COUNTY OF HENNEPIN
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Jadyn Marie Little

Defendant

LAW ENFORCEMENT OFFICER RETURN OF SERVICE

I hereby Certify and Return that I have served a copy of this Summons upon the Defendant herein named.

Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

Name: Jadyn Marie Little
DOB: 01/16/2003
Address: 2528 Highway 100 S
 #212
 St. Louis Park, MN 55416

Alias Names/DOB:

SID:

Height:

Weight:

Eye Color:

Hair Color:

Gender:

Race:

Fingerprints Required per Statute:

Fingerprint match to Criminal History Record:

Driver's License #:

SILS Person ID #:

SILS Tracking No.

Alcohol Concentration:

FEMALE

White

Yes

No

969689

3507625

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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	3/15/2025	260C.425.1(a) Contributes to need for child protection or services	Gross Misdemeanor	I2000		MN0272100	25002843
	Penalty	3/15/2025	260C.425.1(a) Contributes to need for child protection or services	Gross Misdemeanor	I2000		MN0272100	25002843



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