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STATE OF MINNESOTA DISTRICT COURT

COUNTY OF HENNEPIN FOURTH JUDICIAL DISTRICT

Court File No.: 27-CR-98-60512

Bryan Keith Hooper,

Petitioner,

v.

State of Minnesota,

Respondent.

MEMORANDUM OF LAW IN SUPPORT OF PETITION FOR POST-CONVICTION RELIEF

I publicly lied on you and will do all it takes to fix it so that you to[o] may know the truth. I hurt you so bad and you can't get back that time I stole from you but I can now tell the truth so that all will know that you truly was innocent. I pray you have found God during this time and can forgive me, please forgive me [Bryan] Hooper!

-Chalaka Young, July 18, 2025

[T]hey might give me the 25 years that he has done, they may give me an additional 30 years. They may give me the electric chair, they may give me whatever, it doesn't matter.

-Chalaka Young, July 23, 2025

INTRODUCTION

Bryan Hooper has spent nearly three decades in prison for a murder he has always insisted he did not commit. Now, in a remarkable act of conscience, the key witness against Mr. Hooper comes forward to attest to the devastating lie that led to the conviction of an innocent man. Chalaka Young (formerly Chalaka Lewis) confesses she, not Bryan Hooper, killed Ann Prazniak. She admits her trial testimony was false. She affirms Mr. Hooper had nothing whatsoever to do with the crime she committed. Ms. Young's decision to speak out was prompted by nothing but her newfound sobriety, her

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spiritual awakening, and the crushing weight of a secret she has carried for 27 years.

These extraordinary circumstances demand swift and decisive relief. Bryan Hooper, ***anticipating the full support of the Hennepin County Attorney's Office***, urges this Court to convene the earliest possible hearing, vacate his conviction, and send him home to his family—at long last.

FACTUAL AND PROCEDURAL BACKGROUND

A. The Murder and The Trial Evidence.

The story of Bryan Hooper's wrongful conviction began with a brutal and senseless killing. On April 15, 1998, Minneapolis police found the body of 77-year-old Ann Prazniak inside a cardboard box in her bedroom closet in the apartment complex at 1818 Park Avenue in Minneapolis. *State v. Hooper*, 620 N.W.2d 31, 33 (Minn. 2000) ("*Hooper I*"). Ms. Prazniak's body was wrapped in garbage bags, blankets, and other bedding. *Id.* at 34. She was bound with an electrical cord and layers of tape had been wrapped around her head. *Id.* Ms. Prazniak had a broken rib as well as injuries to her knees and wrists. *Id.* Her cause of death was asphyxiation. *Id.*

The medical examiner estimated that Ms. Prazniak was killed two weeks to one month before the discovery of her body. *Hooper I*, 620 N.W.2d at 34. During those weeks, neighbors observed multiple people coming in and out of the apartment, which appeared to have been used as a haven for drug use and prostitution after Ms. Prazniak's death. *Id.*

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Among those who had reportedly entered the apartment were Chalaka Young[1] (then nicknamed "Shay"), Vonda Quass, and Bryan Hooper (then nicknamed "Brome"). *Hooper I*, 620 N.W.2d at 34. Police found Chalaka Young's fingerprints on pieces of tape stuck to the floor of the apartment, similar to the tape removed from Ms. Prazniak's body. *Id*. Police found the fingerprints of Vonda Quass (who admitted to smoking crack in the apartment) on a garbage bag similar to the ones used to wrap the body. *Id*.

Mr. Hooper's fingerprints were found on two sandwich baggies and a beer can in the living room. Unlike Ms. Young, however, Mr. Hooper's fingerprints were not found on any objects with a direct link to Ms. Prazniak's murder. *Hooper I*, 620 N.W.2d at 34. In interviews with police, Mr. Hooper described Ms. Prazniak as a "nice little old lady" whom he had met once when he helped her take out her garbage. *Id*. Mr. Hooper admitted having been in the apartment, but denied involvement in or knowledge about Ms. Prazniak's death. *Id*. at 35.

The State's case against Bryan Hooper hinged on Chalaka Young. Police interviewed her at least seven times in the weeks following Ms. Prazniak's death. In the first several interviews, Ms. Young denied any knowledge of the murder. When police came to her a sixth time, on May 16, 1998, she changed her story and crafted a narrative, pointing the finger at Mr. Hooper.

Ms. Young told police that on the day of the murder she was smoking crack in the

[1] At the time, Ms. Young went by the name Chalaka Lewis. For clarity, she is referred to throughout this memorandum as Chalaka Young, the name she currently uses.

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apartment building. *Hooper I*, 620 N.W.2d at 35. Ms. Young reported that while she was in the hallway, she saw Mr. Hooper standing near Ms. Prazniak's apartment with a woman named Tammy and two other people. *Id*. She claimed that later she saw Mr. Hooper in Ms. Prazniak's apartment and he offered her drugs in exchange for serving as a lookout for him. *Id*. According to Ms. Young's story, she watched out the door as Mr. Hooper went into a back room. Ms. Young claimed that while he was back there, she heard a woman's voice say "help." *Id*.

Later, Ms. Young said, Mr. Hooper ordered her to tear off strips of packing tape that he would take into the bedroom. *Hooper I*, 620 N.W.2d at 35. Ms. Young claimed she believed Mr. Hooper had done something to Tammy in the bedroom.[2] Ms. Young said Mr. Hooper ordered her to straighten up the apartment (while plying her with more drugs), and threatened to kill her and her unborn child (she was five months pregnant) if she told anyone what happened. *Id*. Finally, Ms. Young told police she did not enter the bedroom closet, because a knife was wedged between the door and the door jamb, and because Mr. Hooper told her to leave the closet alone. *Id*.

In addition to Ms. Young, who essentially repeated this story at Mr. Hooper's trial, four additional witnesses testified that Mr. Hooper made incriminating statements after Ms. Prazniak's death. *Hooper I*, 620 N.W.2d at 36. Calvin King testified that, while using drugs together, Mr. Hooper had confessed to killing an old woman. *Id*. In exchange for his testimony, the prosecutor told King he would assist King in getting

[2] The investigation never turned up anyone named Tammy. *Hooper I* at 35. As further discussed herein, Ms. Young now admits that, like the rest of her story, Tammy was a fabrication.

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credit for time served for an unrelated offense. *Id.*

Cardnel Brown testified that, while at the Hennepin County Workhouse, Mr. Hooper confessed to pushing a lady in the face, knocking her unconscious, then wrapped her in bedding and plastic and put her in a box in a closet. *Hooper I*, 620 N.W.2d at 36. Brown acknowledged at trial he had received $30 from a police officer but denied that the money was paid in exchange for his testimony. *Id.* Brown would later concede that a detective had promised to pay him $800 in exchange for his testimony against Mr. Hooper, although he never received that money. *See Hooper v. State*, 838 N.W.2d 775, 789 (Minn. 2013).

Lucas James testified that, like Cardnel Brown, he discussed the case with Mr. Hooper at the Hennepin County Workhouse. *Hooper I*, 620 N.W.2d at 36. James testified that during those conversations Mr. Hooper admitted being involved in "Annie's" murder, that Ms. Prazniak had confronted Mr. Hooper for using her apartment for prostitution without paying her, and that Ms. Prazniak had pushed Mr. Hooper to the door, causing him to "snap" and start "swinging on her," ultimately killing her. *Id.* In exchange for his testimony, Mr. James received a reduced sentence for an unrelated crime. *Id.*

Lolita Fairley first told police Mr. Hooper confided in her that he had killed Ms. Prazniak in front of a group of people getting high in her apartment. *Hooper I*, 620 N.W.2d at 36. Ms. Fairley threw in a baseless accusation that Mr. Hooper had killed someone else in an unrelated incident. *Id.* At trial, however, she testified Mr. Hooper merely said he had "accidentally killed her," without identifying who was "her." *Id.*

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The jury convicted Mr. Hooper of three counts of first-degree murder, and he received three concurrent life sentences.[3] As of the date of this Petition, Bryan Hooper has been in prison for more than 27 years.

B. Recantations and Efforts at Post-Conviction Relief.

On March 11, 2003, Mr. Hooper filed a petition for post-conviction relief, his second.[4] Mr. Hooper's petition was based on, among other things, recantations by Cardnel Brown and Calvin King. On January 10, 2003, Mr. Brown swore in an affidavit that his trial testimony against Mr. Hooper was false—Mr. Hooper had never admitted any connection to Ms. Prazniak's murder. *Hooper v. State*, 680 N.W.2d 89, 95 (Minn. 2004) ("*Hooper II*"). Rather, Mr. Hooper merely said he had gotten high in Ms. Prazniak's apartment, without knowing there was a dead body there. *Id.*

Calvin King, in a conversation with defense counsel and a defense investigator, had nodded his head when confronted with counsel's belief that Mr. King's trial testimony was false. *See Hooper II*, 680 N.W.2d at 94. Mr. King further promised to provide a written statement confirming the falsity of his trial testimony once pending charges against him were resolved, but no such statement was submitted. *Id.*

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[3] While Mr. Hooper was convicted of first-degree premeditated murder under Minn. Stat. § 609.185(a)(1), that conviction came before the 2005 amendment to Section 609.106 making first-degree premeditated murder subject to an automatic sentence of life in prison without the possibility of release. Therefore, Mr. Hooper's sentence does carry the possibility of release.

[4] Mr. Hooper stayed his direct appeal to file his first petition for post-conviction relief, seeking a new trial based on newly discovered evidence of a witness who claimed that Vonda Quass had admitted that she and Chalaka Young had killed Ms. Prazniak. The trial court denied the petition, finding that the witness lacked credibility, and the Minnesota Supreme Court affirmed both the conviction and the denial of post-conviction relief. *See Hooper I*, 620 N.W.2d at 41.

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The district court denied the petition without a hearing. The Minnesota Supreme Court affirmed, holding that no hearing was warranted because, even without Mr. Brown's testimony, "the strength of the other evidence presented at trial was such that the jury would not likely have reached a different conclusion." *See Hooper II*, 680 N.W.2d at 95. As for Mr. King, the Court held that his body language did not constitute a sufficient recantation to warrant relief. *Id.* In denying the petition, the Court relied on the testimony of Lucas James, Lolita Fairley, and, most notably, Chalaka Young. *See id.*

Years later, Mr. Hooper filed a third petition for post-conviction relief. The petition was based on, among other things, the recantations of Mr. King and Mr. Brown, as well as a recantation by Lucas James. *See Hooper v. State*, 838 N.W.2d 775, 779 (Minn. 2013) ("*Hooper III*"). Mr. Hooper further based the petition on evidence from a new witness, Andre Agee. *Id.* at 779.

The district court granted an evidentiary hearing on the Lucas James recantation and the new witness, but summarily denied relief on all other claims under *Knaffla*. *Hooper III*, 838 N.W.2d at 780–81 (citing *State v. Knaffla*, 243 N.W.2d 737 (Minn. 1976)). Mr. James testified at the hearing that—contrary to what he said at trial—Mr. Hooper had never said anything to him about killing Ms. Prazniak. *Id.* at 784. Andre Agee also testified that Chalaka Young told him in 1999 that she "had killed an old lady before." *Id.* at 783.

As for the Lucas James recantation, the district court determined that Mr. James' testimony was not credible, because his grand jury testimony had been consistent with

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his trial testimony, and because his recent convictions (controlled substance in 2006, theft by swindle in 2010) undermined his claim to being a reformed man, the purported reason for his recantation. *See Hooper III*, 838 N.W.2d at 784.

The district court further held that Andre Agee's testimony was doubtful and would not have produced a more favorable result at trial. *Hooper III*, 838 N.W.2d at 780. The Minnesota Supreme Court affirmed the denial of post-conviction relief. *See id.* at 790.

In July 2015, Mr. Hooper filed his fourth petition for post-conviction relief. In addition to the recantations of Mr. Brown, Mr. King, and Mr. James, Mr. Hooper offered the recantation of Lolita Fairley. *Hooper v. State*, 888 N.W.2d 133, 141 (Minn. 2016) ("*Hooper IV*"). In an affidavit, Ms. Fairley admitted that she lied about Mr. Hooper's supposed confession in the hope of receiving reward money. *Hooper IV*, 888 N.W.2d at 141. Again, the Court denied relief without a hearing, holding that the recantations of Brown, King, and James were *Knaffla* barred, and that the claim based on Ms. Fairley's recantation was time barred. *Id.*

Mr. Hooper argued his claim qualified for the interests-of-justice exception to the procedural bars, noting that "the recantation of [Lolita Fairley], corroborated by the recantations of C. K. [Calvin King], C.B. [Cardnel Brown], and L.J. [Lucas James] and the unreliability of C.L.'s [Chalaka Young's] accomplice testimony, establish that he is entitled to a new trial." *Hooper IV*, 888 N.W.2d at 142. The district court disagreed, and the Supreme Court affirmed, holding that "even without all of the allegedly recanted confession testimony, there remained compelling evidence of Hooper's guilt."

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Id. at 143.

On November 25, 2019, Mr. Hooper filed a fifth petition for post-conviction relief, this time proceeding *pro se*. Index No. 87. In his petition and supporting memorandum [Index No. 90], Mr. Hooper alleged, among other things, that "the postconviction statute and procedures are unconstitutional because they create a 'Hobson's Choice' (or impermissible 'Catch-22') because a petitioner must bring claims within two years or they will be barred, but if the claims are brought, they may not be considered again later." Index No. 120, p. 7.

As accurately pointed out by Mr. Hooper in his astonishingly well-crafted *pro se* memorandum, "a defendant is forced to bring a claim within two years even if by itself it is insufficient to obtain relief or its outlines are not yet clear, but in avoiding the time bar they are barred from having the claim considered later even if the combined issues would be enough to demand relief or if the claim is now fully developed, curing past flaws." Index No. 90, p. 101.

The district court denied Mr. Hooper's fifth petition (as well as his related motion for DNA testing [Index No. 106]), holding that the post-conviction claims were procedurally barred and that trial and appellate counsel were not constitutionally ineffective. Index No. 120, pp. 8–19. The district court denied Mr. Hooper's request for DNA testing, holding that such testing "would not demonstrate Petitioner's actual innocence." *Id*., p. 22. In so holding, the district court relied on the damning trial testimony from Chalaka Young:

As the state proved at trial, Petitioner had an accomplice (C.L.) [Chalaka

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> Young], and Petitioner directed [Ms. Young] to handle various items, including tape that was similar to tape found covering the victim, along with garbage and Christmas lights that [Chalaka Young] removed at Petitioner's direction from the victim's bedroom.

Id., p. 22.

C. Chalaka Young Confesses.

Following the denial of his fifth petition, Mr. Hooper languished in prison for the next five, waiting for a miracle. The miracle materialized just weeks ago, when Chalaka Young—serving a 10-year sentence in a Georgia prison for aggravated battery and now newly sober and devout—was gripped by a crisis of conscience. In a signed, handwritten statement offered with no prompting, Ms. Young now unburdens herself and finally tells the truth about what happened to Ann Prazniak, stating, "I am not okay any longer with [an] innocent man sitting in prison for a crime he did not commit…." Petition, Ex. A, p. 1.

Explaining that her "soul [sic] purpose here is not to make any excuse but to take responsibility for two innocent lives that I have destroyed and . . . to make true amends for once in my life," Ms. Young recounts the events surrounding Ms. Prazniak's death:

> I was five month[s] pregnant and I was in this apartment building sitting on the stairway smoking crack[.] A white lady came up with bags in her hand as if she had just come from the store, I asked her if she had something to drink she said yes come on and we went to her apartment where she gave me a full cup of some sort of [g]in, the next thing I remember after that is walking towards her but waking up on the couch crying asking God to forgive me . . .
>
> ***
>
> I walked toward the back area and just in the doorway on the floor laying was Ms. Ann I didn't know that was her name at the time. I couldn't understand what had happen[ed] so I became very scared and checked her and she was dead and I started again crying asking God to forgive me and

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forgive her sins.

Petition, Ex. A, pp. 2–3. Ms. Young describes panicking and leaving the apartment to get more drugs before returning alone to dispose of the body:

> [I] went back to the apartment to figure out what to do. I felt like an evil presence was in me. As I sat back on the couch my mind beg[an] to plot what I can do to get out of this. But I needed more dope to do it. So I pulled the door close[d] to the back room and found the key and locked the door because I needed more dope . . . I stayed as high as I could because to come down was to[o] devastating for my mind. I had only been in the state for a couple of months for my husband and child had abandon[ed] me and I had abandon[ed] them, and now I had accidentally killed this woman and didn't know how. I was so consumed with fear and evil, all I thought about was how can I not get caught . . . [E]ach time I would take a hit of dope I would get ideas. Tape up the body put it in a box and shove it in the closet, and that's what I did.

Id., pp. 4–5. Ms. Young then explains how she came to falsely accuse Bryan Hooper:

> [W]hen I was picked up off the streets as to be question[ed] about the body that was found in the apartment, I was named as the person who had been there and I was found by two detectives walking the streets in search for more dope, when they begin to ask me about what I knew about the apartment, I became fearful and lied and said a man named Brome took me over there, which was lie, I had met a man named Brome one time . . . So I made up the whole story about Brome and anything with his name in it, I continued on with the lie . . .

Id., p. 6.

Ms. Young feels compelled to directly address Mr. Hooper:

> [I] desire for Brome to know I have found life in Christ Jesus and I'm so sorry it has taken me so long[,] you deserve justice. I publicly lied on you and will do all it takes to fix it so that you to[o] may know the truth. I hurt you so bad and you can't get back that time I stole from you but I can now tell the truth so that all will know that you truly was innocent. I pray you have found God during this time and can forgive me, please forgive me Brome Hooper!

Id., p. 2. Mr. Young concludes as follows:

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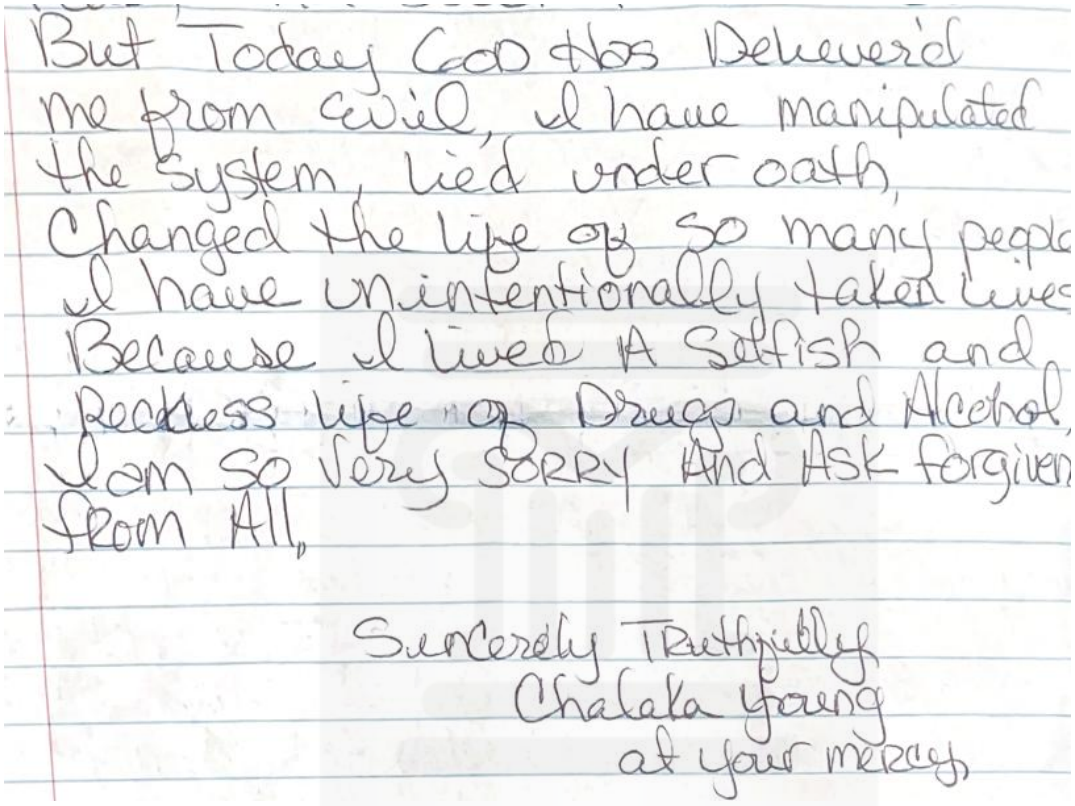
But Today God has Delivered
me from evil, I have manipulated
the System, lied under oath,
Changed the life of so many people
I have unintentionally taken lives
Because I lived A Selfish and
Reckless life of Drugs and Alcohol,
I am so very SORRY And ASK forgiven
from All,

Sincerely Truthfully
Chalaka Young
at your mercy,

Id., p. 7.

D. Chalaka Young Confesses a Second Time.

Ms. Young was not satisfied merely writing her confession—she took affirmative steps to remedy the harm caused by her lie. Ms. Young reported to Chaplain Janine Davis of Emanuel Women's Facility that "she committed a murder 25 years ago and wanted to confess." Petition, Ex. B. Pursuant to a request from Ms. Young to speak to someone in law enforcement, Special Agent Ashley Jay of the Georgia Department of Corrections interviewed Ms. Young on July 23, 2025. *Id.*

In her two interviews with Agent Jay, Ms. Young confirms the substance of her written statement—she caused Ms. Prazniak's death, she disposed of the body, and she falsely implicated "Brome" Hooper—and provides some additional details: when hiding

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the body she used a picture frame to assist in moving the body; she allowed other people in the apartment but kept everyone out of the back room; she placed a knife in the bottom of the closet, and; she had invented "Tammy," the white woman that was supposedly in the apartment with Mr. Hooper. Petition, Exs. B, C, & D.[5] According to Agent Jay, "Young expressed remorse for her actions and stated she is now four years sober. She indicated a desire to clear the wrongfully convicted man's name and face consequences for her actions." *Id.*, Ex. B.

During the interviews with Agent Jay, Ms. Young tearfully explains that the secret has been eating away at her, that she has now been sober for four years, and that she has found God. Petition, Exs. C & D. Ms. Young makes clear to Agent Jay that she does not know whether Mr. Hooper is still incarcerated (Ex. C, pp. 2–3), but states, "I don't care. But I know even if he has been released out of there, there's still stuff on the internet that could possibly prevent him from getting a good job." *Id.*, Ex. C, p. 3. Ms. Young explains to Agent Jay how years earlier Mr. Hooper's attorney had come to speak to her and she "didn't say right then and there when I should have said it . . . I'm guilty. I'm the one who did it. Your client is innocent." *Id.*, p. 5.

Additionally, during the interview with Agent Jay, Ms. Young confirms her understanding that by coming forward and making these admissions, she is putting herself at significant risk of criminal prosecution and punishment:

> Even if I, even if it doesn't matter, they might give me the 25 years that he has done, they may give me an additional 30 years. They may give me the

[5] Recordings of the Chalaka Young interviews cited herein will be submitted to the Court on a flash drive as Exhibit M. For the Court's convenience, transcripts of these interviews are also being submitted as Exhibits C, D, F, & G.

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electric chair, they may give me whatever, it doesn't matter.

Petition, Ex. D, p. 18.

E. Chalaka Young Confesses a Third Time.

Given the significance of Ms. Young's revelations, the Georgia Department of Corrections reached out the Minneapolis Police Department. Petition, Ex. E. Ms. Young then repeated her confession and recantation in a July 28, 2025 telephone interview with Sergeant Mark Suchta of the Minneapolis Police Department. Petition, Ex. F. Ms. Young confirms her account of Mr. Prazniak's death and her false testimony against Mr. Hooper. *Id.* She also confirms she only has four to five years left to serve on her assault conviction. *See id.*, pp. 1–2.

F. Chalaka Young Confesses a Fourth Time.

Even prior to Ms. Young's confession, the Hennepin County Attorney's Office had begun investigating this case through its Conviction Integrity Unit ("CIU"). In an effort to further test the genuineness of Ms. Young's confession and recantation, the CIU procured recordings of recent calls placed by Ms. Young to family and friends. In those calls, Ms. Young confides in loved ones about coming forward, her guilt over Ms. Prazniak's death, her false testimony against Mr. Hooper, and her efforts to make things right. For example, on July 31, 2025, Ms. Young placed a call to a loved one, apparently the father of one of her children. Petition, Ex. G. In this call, Ms. Young candidly explains her recent change of heart and warns him of the likely consequences:

> [T]here's some things that have happened in my life, this was way before I even met you. So I'm going back and I'm trying to just, you know, just make some amends in my life because of the things that I've done and, it

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> could possibly, um, I could possibly not even get out of prison, ever get out of prison because of what has happened in, happened in the past . . .
>
> ***
>
> . . . I just, you know, just had a spiritual awakening. The way that I lived my life, it was just so reckless, you know? And, and people lost their life, you know? And so, um, and then there's an innocent man did time for a crime that he didn't even commit . . .
>
> ***
>
> I was intoxicated. All I know is that, uh, I tried to hide it and, and then I blamed it on somebody. This dude named Brome . . . And this man was sentenced to 30 years in prison for a crime I know he didn't commit 'cause I was, I was the only one there.

Id., pp. 1; 2; 4.

G. Chalaka Young Confesses a Fifth Time.

The CIU interviewed Ms. Young on August 6, 2025. *See* Petition, Ex. H. In the course of that interview, Ms. Young repeated the admissions that she made in her handwritten letter, in the interviews with Agent Jay, in the interview with Sgt. Suchta, and in her private phone calls—her trial testimony was false, she alone was responsible for Ms. Prazniak's death, and Mr. Hooper had nothing to do with the crime. *Id.*

H. Chalaka Young's Confessions are Well Corroborated.

Ms. Young's account finds ample support in evidence known at the time trial and in additional evidence that has come to light since then. At the time of the initial investigation, police recovered a check from Ms. Prazniak's account dated March 23, 1998, which had been cashed by Ms. Young around the time of Ms. Prazniak's death. *Hooper I*, 620 N.W.2d at 40. As noted by the Minnesota Supreme Court, this "evidence supported [Mr. Hooper's] theory that [Ms. Young] was implicated in the murder." *Id.* Physical evidence also tied Ms. Young not only the crime scene but to Ms. Prazniak's

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death. As noted above, Ms. Young's fingerprints were on the tape in Ms. Prazniak's apartment, the same tape used in the murder.

In addition, during the initial investigation, a man named Terry Edwards reported to a Minneapolis police officer that Chalaka Young told him she had accidentally killed Ms. Prazniak. *See Hooper III*, 838 N.W.2d at 786. The officer testified he had no reason to believe Mr. Edwards was lying. *Id*. As further referenced above, Mr. Edwards signed an affidavit in 2011, confirming what Ms. Young had told him. Petition, Ex. J.

Details provided in Ms. Young's confessions, made 27 years after the fact, line up with the evidence. In addition to remembering writing a check from Ms. Prazniak's checkbook and referring to the knife she left in the closet, Ms. Young provides a previously unknown detail: "I had to use like a, a picture frame or something to help me put it [the body] in a box." Petition, Ex. D, p. 4. This incongruous assertion is backed up by a photograph of the crime scene, which shows a painting with a large frame leaning against the wall of the bedroom:

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Petition, Ex. I.

As part of its investigation, the CIU set out to interview all the principal trial witnesses. While the CIU has not yet been successful in interviewing Lolita Fairley, and Calvin King is now deceased, the CIU investigator did interview Terry Edwards, Cardnel Brown, and Lucas James. *See* Petition, Exs. J–L. Edwards confirmed again that Ms. Young had confessed to killing Ms. Prazniak, and re-signed his 2010 affidavit to affirm its accuracy. *See* Ex. J. Brown and James confirmed again that their testimony implicating Mr. Hooper was false, and each re-affirmed the accuracy of their previous affidavits. *See* Exs. K; L.

In sum, the following chart summarizes the state of witness accounts regarding Bryan Hooper's involvement in the death of Ann Prazniak:

WITNESS	**ACCOUNT AT TIME OF TRIAL**	**ACCOUNT AFTER TRIAL**
Bryan Hooper	Maintained his innocence.	Maintains his innocence.
Chalaka Young	Bryan Hooper made her stand lookout while he killed a woman.	Chalaka Young killed Ann Prazniak; Bryan Hooper is innocent.
Terry Edwards	Chalaka Young confessed to killing Ann Prazniak.	Chalaka Young confessed to killing Ann Prazniak.
Cardnel Brown	Bryan Hooper confessed to killing Ann Prazniak.	Bryan Hooper never confessed to killing Ann Prazniak (reaffirmed in 2025).
Lucas James	Bryan Hooper confessed to killing Ann Prazniak.	Bryan Hooper never confessed to killing Ann Prazniak (reaffirmed in 2025).

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Calvin King	Bryan Hooper confessed to killing Ann Prazniak.	Interviewed before his death, responded affirmatively to accusation of false testimony.
Lolita Fairley	Bryan Hooper confessed to killing Ann Prazniak.	Bryan Hooper never confessed to killing Ann Prazniak.[6]

ARGUMENT

Bryan Hooper's conviction cannot stand as a matter of Minnesota law and fundamental principles of justice. New testimonial evidence not previously presented to any court now confirms not only that Mr. Hooper was convicted based on false evidence, but that he is factually innocent.

A. False Evidence Tainted Bryan Hooper's Conviction.

A criminal defendant "has a right to be tried, insofar as possible, on the basis of true and correct evidence; to deny him this right is to deny him a fair trial." *State v. Caldwell*, 322 N.W.2d 574, 586 (Minn. 1982). Under Minnesota law, a new trial is appropriate where:

(a) The court is reasonably well satisfied that the testimony given by a material witness is false.

(b) Without it the jury *might* have reached a different conclusion.

[6] In the interest of full candor to the Court, the State has disclosed a police interview with Ms. Fairley from September 14, 2015, shortly after Mr. Hooper filed his 2015 post-conviction petition that included a claim based on her recanting affidavit dated October 23, 2013. In that interview, Ms. Fairley equivocated on the substance of her recantation, indicated that she signed the recantation in order to get Mr. Hooper's investigator to stop bothering her, and expressed suspicion that Mr. Hooper was the killer since he had been at the apartment. It appears, however, that Ms. Fairley did not expressly revoke the core substance of her recantation, and she told the officer that she originally spoke to the police in hopes of getting reward money.

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> (c) The party seeking the new trial was taken by surprise when the false testimony was given and was unable to meet it or did not know of its falsity until after the trial.

Id. at 584–85 (*emphasis in original*); see also *Ferguson v. State*, 645 N.W.2d 437, 442 (Minn. 2002). Minnesota courts refer to this as the *Larrison* test. *See Caldwell*, 322 N.W.2d at 584–85 (citing *Larrison v. U.S.*, 24 F.2d 82 (7th Cir. 1928)).

The third prong (surprise) is relevant but is not an "absolute condition precedent to a new trial." *Id.* at 559. The third prong is generally unnecessary in cases where an alleged co-conspirator offered the false testimony that the defendant would have known was false at the time of trial but had no satisfactory way to counter that lie in real time—as was the case here.

1. Several Prosecution Witnesses Testified Falsely at Mr. Hooper's Trial.

As discussed in detail above, the primary witnesses against Mr. Hooper were Chalaka Young, Calvin King, Cardnel Brown, Lucas James, and Lolita Fairley, all of whom have now admitted that their trial testimony was false.

a. *Chalaka Young Has Provided a Genuine Recantation of Her Trial Testimony.*

Chalaka Young has now given half a dozen statements in which she has unequivocally recanted her trial testimony against Mr. Hooper. She admits that she is solely responsible for the death and concealment of Ann Prazniak's body:

- Handwritten statement dated July 19, 2025 (Ex. A);
- July 23, 2025 statement to Georgia Special Agent Ashley Jay (Ex. C);

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- July 23, 2025, again to Special Agent Jay following a *Miranda* warning (Ex. D);
- July 28, 2025 statement to Minneapolis Police Department Sergeant Suchta (Ex. E);
- July 31, 2025 recorded telephone call to her daughter's father (Ex. G); and
- August 6, 2025 statement to Hennepin County Attorney's Office's Conviction Integrity Unit Investigator Julia Merritt (Ex. H).

In each of these accounts, Ms. Young provides a consistent, credible, and unprompted account of what happened to Ms. Prazniak; an account that exonerates Mr. Hooper.

In her statements, Ms. Young recalls that at the time of the incident, she was smoking crack cocaine in an apartment building in Minneapolis, when she encountered Ms. Prazniak. Ms. Young asked Ms. Prazniak for some alcohol. The two women entered Ms. Prazniak's apartment, where Ms. Prazniak provided Young with some gin. Shortly thereafter, Ms. Young states she lost consciousness for some time and woke up in Ms. Prazniak's apartment, where she discovered Ms. Prazniak's body on the floor. Ms. Young recalls believing Ms. Prazniak was deceased based on her appearance.

Ms. Young told Special Agent Jay that, sometime following the discovery of Ms. Prazniak's body, she: used multiple rolls of tape to bind the Ms. Prazniak's hands, legs, and body; used a picture frame to push the body into a cardboard box; placed the cardboard box in a closet alongside a knife; stole and cashed checks belonging to Ms. Prazniak; left Ms. Prazniak's apartment to purchase drugs, and; allowed others to enter the apartment (while restricting access to the back room). Throughout her statements,

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Ms. Young is steadfast in maintaining that Mr. Hooper was not present for, and played no role in, the murder of Ms. Prazniak, nor the concealment of her body. Several factors combine such that any reasonable factfinder would be reasonably satisfied that Ms. Young's trial testimony was false.

i. The recordings of the recantations are highly compelling.

Ms. Young speaks with moral conviction and sincere emotion. The recorded statements show Ms. Young has experienced a very real crisis of conscience (spurred by sobriety and faith) and feels a strong need to make amends for a crime and a lie that have long burdened her. There is simply no reason to believe her spiritual awakening and desire to reveal the truth are anything but genuine.

ii. Ms. Young's statements are against her own self-interest.

Ms. Young has now confessed to homicide four times directly to various law enforcement agents. By her own account, Ms. Young has gotten away with murder for 27 years. As such, there is simply no reason for Ms. Young to come forward in this manner unless it is to tell the truth. She has nothing to gain personally and a great deal to lose, a fact of which she is quite aware. At several points in her recorded statements, she acknowledges that her decision to come clean could result in more prison time. Indeed, she actually appears to overestimate the downside risk: at one point, she speculates that she could receive the death penalty, apparently unaware that Minnesota (unlike Georgia, where she has lived for many years) does not have the death penalty. Notably, although she is currently serving a prison sentence in Georgia for aggravated battery, she is set to be released within four to five years. In other words, this is not a

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case in which a recanting witness serving a life sentence has nothing to lose by confessing. In addition to obvious criminal consequences, Ms. Young also recognizes that her confession is likely to wreak havoc in her personal and family life.

iii. Ms. Young's statements are consistent with the material, undisputed facts of the case.

While some of the details Ms. Young provides have long been public, she does offer at least one new detail of interest: her use of a large, framed picture to assist her in moving Ms. Prazniak's body into the box. As discussed above, the crime scene photos corroborate the existence of the large picture frame and its proximity to where the body was recovered. The large picture was leaning against the wall in the bedroom that Ms. Young claimed at trial never to have entered.

Ms. Young's statements are also compatible with the medical examiner's testimony concerning the cause of death, although her account omits the critical details that would explain exactly how Ms. Prazniak was asphyxiated. Dr. Davis testified at trial that there were three potential mechanisms of asphyxia: (1) the gag around her mouth and nose made of tape, (2) pressure on her chest, as evidenced by the broken left rib, or (3) positional asphyxia from being placed upside down in the box (T.[7] 309–10).

Options (1) and (3) would seem to be inconsistent with Ms. Young's account, since she claims that Ms. Prazniak was (or at least appeared to be) dead before she wrapped up the body and put it in the box. Option (2), however, leaves open the possibility that some earlier event caused Ms. Prazniak's death. Determining what that event may have

[7] Citations to "T." refer to page numbers in Mr. Hooper's trial transcript.

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been leads us immediately into the realm of speculation, since Ms. Young claims to have blacked out such that she cannot remember the killing itself; nonetheless, the point remains that her story is at least compatible with the medical evidence.

To that end, this Court should not be troubled with the fact that Ms. Young cannot provide a detailed account of how Ms. Prazniak died. Given her credible claim of having been severely intoxicated on a mix of alcohol and crack, a blackout is entirely plausible. Ms. Young is not claiming a blackout to avoid responsibility. She insists that, even though she cannot remember it, she must have caused Ms. Prazniak's death since she was the only other person in the apartment at the time. The most cynical reading of this part of her story is that she is using the blackout narrative to introduce ambiguity as to whether she intentionally caused Ms. Prazniak's death. She does speculate at various points in her statement that she must have "accidentally" killed Ms. Prazniak. Even if that were true, however, that concern goes more toward what charges she could face in a future prosecution, and does not negate the credibility of her assertion that Mr. Hooper had no involvement.

The only point in Ms. Young's narrative that is in tension with the known facts is her insistence that Mr. Hooper was never in the apartment at all, even in the period following Ms. Prazniak's death when several individuals were using the apartment to use and sell drugs. This is not so. Mr. Hooper freely admitted to being in the apartment following Ms. Prazniak's death to police, and his fingerprints were found on baggies and beer cans in the apartment (T. 587, 828).

Ms. Young's statements remain credible, despite this inconsistency. These events

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occurred 27 years ago at a time when Ms. Young was using drugs and alcohol heavily. It is reasonable to believe that she remembers more important facts (like whether she alone concealed Ms. Prazniak's body) while forgetting less important facts (like who was hanging around, smoking crack after the fact). She also noted in her interview with the CIU investigator that there were times when she was absent from the apartment while others remained there. It is entirely possible that some or all of the time Mr. Hooper spent in the apartment occurred in her absence. In any event, what is abundantly clear is that Ms. Young knows Mr. Hooper had no involvement in the crime for which he was wrongly convicted.

iv. Even before Ms. Young's recent statements, there were plenty of reasons to doubt her original trial testimony.

Given her own criminal exposure, Ms. Young had an obvious incentive to deflect the blame toward someone else. In exchange for her cooperation in the case against Mr. Hooper, Ms. Young was able to plead guilty to one count of first-degree burglary, for which she was sentenced to 31 months. The State agreed not to charge Ms. Young for forging Ms. Prazniak's checks. The State granted Ms. Young immunity for her testimony in Mr. Hooper's trial proceedings. In short, for someone who easily could have faced first-degree murder charges, Ms. Young had maximal incentives to point the finger at Bryan Hooper.

In addition to those incentives, the details of her trial account never made sense on their face. Ms. Young testified that she saw Mr. Hooper standing in the doorway of Ms. Prazniak's apartment and that he affirmatively asked her to stand lookout for him, offering to give her crack in exchange (T. 393–95). But if Mr. Hooper was about to

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commit a murder, why go out of his way to create a witness to the crime? Why would he even need a lookout when he could have just locked the door?

Ms. Young's account at trial of what happens next is similarly hard to believe. She testified Mr. Hooper found a roll of tape and forced her to tear off strips for him while he was going back and forth between the bedroom and the living room, where Ms. Young was purportedly standing (T. 403–04). While Ms. Young claimed not to have seen what Mr. Hooper was doing with that tape, the obvious implication was that this was the tape that was wrapped around Ms. Prazniak's head and body. This is equally confusing. Why would Mr. Hooper have her tear off strips of tape in the other room, shuffling back and forth? Why wouldn't he just use the roll himself to tightly wind long strips around the victim? In fact, the evidence suggests the actual perpetrator did just that. The medical examiner described having to cut through multiple layers of tightly bound packing tape (T. 299). The idea that Ms. Young was tearing off very long strips of tape one at a time (not knowing what they are being used for, by the way) is hard to credit.

Ms. Young's story of the tape becomes even harder to believe in light of the information she gave the police, which would seem to be inconsistent with her insistence that she never saw Ms. Prazniak's body. Specifically, she told officers that she thought Mr. Hooper had taped up the victim's mouth, legs, and arms, in the latter instance demonstrating with the position of her wrists (T. 479–81). On cross-examination, when confronted with how she could have known this information since it was not publicly known, she insisted that these were just conclusions she drew but that

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she did not actually see anything (T. 480).

The simplest explanation is that Ms. Young was solely responsible for taping Ms. Prazniak's body. That is why her fingerprints were found on the tape. That is also why Mr. Hooper's fingerprints were absent from the tape (T. 821–22). And because Ms. Young knew she handled the tape, she needed to come up with some story as to how and why she would have done so, no matter how fanciful. That she is now admitting that story was a lie is, conversely, much more believable.

v. Ms. Young's statements to law enforcement are consistent with statements she has made recently in her recorded phone conversations with loved ones.

The substance of the prison call recordings from the Georgia Department of Corrections corroborates everything Ms. Young recently confessed to law enforcement. In those ostensibly private calls, she openly recognized that her choice to come clean could result in new criminal charges, that this case would likely receive substantial public attention, and that all of this is likely to be painful for her daughters. The contents of those calls further burnish the sincerity and truthfulness of Ms. Young's confessions.

vi. Ms. Young's confessions are corroborated by the recantations of Mr. Hooper's confession witnesses.

Several of the other witnesses against Mr. Hooper have reaffirmed their recantations from years prior, confirming Mr. Hooper did not admit to killing Ms. Prazniak. For example, Lucas James re-signed his 2011 affidavit on August 1, 2025, which, in addition to recanting his trial testimony, he offered the following personal note:

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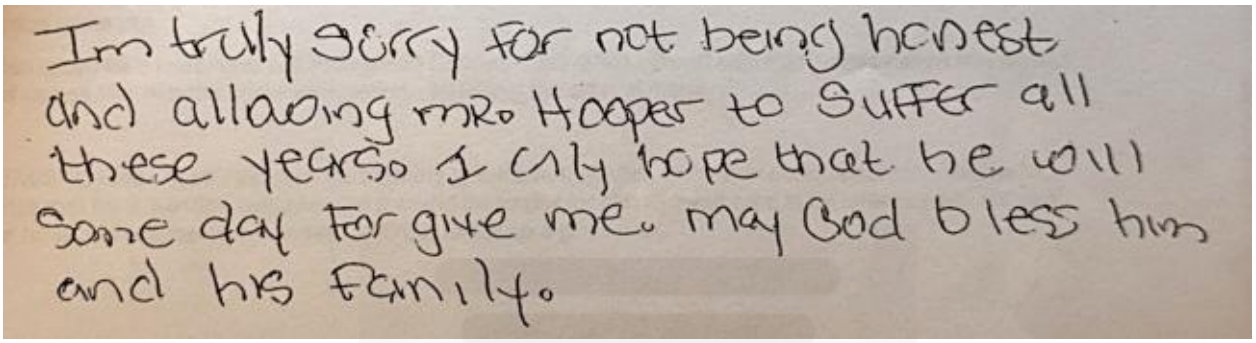

See Ex. K. Cardnel Brown also affirmed the truth of his prior recanting affidavits. *See* Ex. J. Terry Edwards reaffirmed his prior statements that Ms. Young confessed to him shortly after Ms. Prazniak's murder when interviewed on August 1, 2025. *See* Ex. I.

Of course, none of the recantations are new evidence. Yet, this Court can and should consider their collective statements when assessing the credibility and genuineness of Ms. Young's recantation. All told, nothing remains of the evidence used to connect Mr. Hooper to the killing of Ann Prazniak.

2. Without the False Testimony, The Outcome Might Have Been Different.

Without Ms. Young's false testimony, the jury might have reached a different conclusion. The prejudice standard in claims of false evidence is not onerous; "might" has been defined as "something more than an outside chance, although much less than . . . 'would probably.'" *Caldwell*, 322 N.W.2d at 585 n.8 (*citing Kyle v. U.S.*, 297 F.2d 507, 512 (2d Cir. 1961)). That modest standard is easily satisfied here.

While Ms. Young was not the only witness the State called, her testimony was indisputably the strongest piece of evidence against Mr. Hooper. She was the only person who claimed to have directly observed any of the key events. Indeed, the Supreme Court repeatedly relied on the damning nature of Ms. Young's testimony in

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denying post-conviction relief based on the recantations of the secondary witnesses. This is materially analogous to several prior Minnesota cases in which the Supreme Court found the second *Larrison* prong to be satisfied based on recantations from key prosecution witnesses. *See, e.g., Martin v. State*, 825 N.W.2d 734, 744 (Minn. 2013) (holding the second prong was satisfied where allegedly false testimony constituted the "only direct evidence" identifying defendant as one of the shooters); *Dobbins v. State*, 788 N.W.2d 719, 735 (Minn. 2010) (noting that the State had "little other direct evidence" beyond testimony of recanting witness); *Ferguson v. State*, 779 N.W.2d 555, 561 (Minn. 2010) (noting the recanting witness was the only eyewitness to the shooting who testified).

Absent Ms. Young's testimony, the case against Bryan Hooper is drastically undermined. Indeed, the remaining evidence against Mr. Hooper amounts merely to evidence of his presence in the apartment at some point, which he freely admitted, and the four confession witnesses, each and every one of whom has since recanted.

Even at the time of trial, however, there was reason to be suspicious of those witnesses. At least two of them had clear incentives to testify against Mr. Hooper. Specifically, Calvin King was serving a 39-month sentence on a drug offense, but the State agreed to support efforts to get him credit for nine months previously served (T. 515, 530). Lucas James was facing a potential 48-month sentence on robbery charges, but the State agreed to 12 months in the workhouse with electronic home monitoring (T. 354–55). Additionally, the four confession witnesses provided details about the crime that were already publicly disseminated in the media, and the details of their accounts

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contradicted each other in material ways.

Even if one assumes that each of the confession witnesses' recantations are not genuine, the State's case still would have been extremely weak if it relied wholly on their original trial testimonies in the absence of Ms. Young's significantly more incriminating testimony. It bears repeating that Mr. Hooper need only show whether, without Ms. Young's testimony, the jury might have acquitted him. *See State v. Turnage*, 729 N.W.2d 593, 598 (Minn. 2007). Assuming Ms. Young's recanting statements are credited, the answer to this question is plainly yes.

B. Mr. Hooper's *Larrison* Claim is Not *Knaffla*-Barred.

In Minnesota, the *Knaffla* rule bars "all claims that the appellant should have known of at the time of direct appeal." *Koskela v. State*, 690 N.W.2d 133, 134 (Minn. 2004); *see also State v. Knaffla*, 243 N.W.2d 737, 741 (Minn. 1976). Mr. Hooper's *Larrison* claim is not procedurally barred under the *Knaffla* rule. There was no way to present a recantation by Chalaka Young at the time of Mr. Hooper's trial, direct appeal, or previous petitions for post-conviction relief. By her own account, Ms. Young continued to hold on to this lie until sobriety and faith led her to come forward, mere weeks before the filing of this Petition.

Even if *Knaffla* did apply to these circumstances, this case would qualify for an exception. "There are two exceptions to the *Knaffla* rule: (1) if a novel legal issue is presented, or (2) if the interests of justice require review." *Taylor v. State*, 691 N.W.2d 78, 79 (Minn. 2005). Mr. Hooper's claim meets the "interests of justice" exception to *Knaffla*.

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The Court may consider the merits of a petitioner's claim where "a conviction appears to be so improper and unjust as to demand relief" and where it "presents an obvious question of fundamental fairness." *Whitten v. State*, 690 N.W.2d 561, 564 (Minn. 2005). Ms. Young's genuine recantation and confession to the crime, at the very least, demand this Court to examine the merits of Mr. Hooper's post-conviction claims and his overwhelming showing of factual innocence. If *Knaffla* applied here, this case would be the poster child for the "interests of justice" exception.

CONCLUSION

This extremely unusual case warrants immediate relief. Thanks to Chalaka Young's singular act of courage, we now know the identity of Ann Prazniak's killer. It was not Bryan Hooper. It is anticipated that even the prosecution will agree that Bryan Hooper is innocent and that it is long past time for him to go home. Mr. Hooper respectfully requests that the Court convene the earliest possible hearing and enter an order vacating his conviction and discharging him from the shackles of confinement.

Dated: August 12, 2025

s/ James R. Mayer

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