

State of Minnesota
County of St. Louis

District Court
6th Judicial District

Prosecutor File No. 0690212470
Court File No. 69DU-CR-23-2646

State of Minnesota,

COMPLAINT

Plaintiff,

Warrant

vs.

JACKSON MICHAEL GATLIN DOB: 05/11/1988

4501 Pitt Street
Duluth, MN 55804

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: Criminal Sex Cond-4th Degree-Victim 13-15-Act >48m Old

Minnesota Statute: 609.345.1(b)

Maximum Sentence: 10 years or \$20,000 or both

Offense Level: Felony

Offense Date (on or about): 01/01/2008 to 12/31/2009

Control #(ICR#): 23029312

Charge Description: on or between January 1, 2008 and December 31, 2009, in the County of St Louis, Minnesota, Jackson Michael Gatlin engage in sexual contact with another person, and the complainant was at least 13 but less than 16 years of age and the defendant is more than 48 months older than the complainant or in a position of authority over the complainant, to wit: Victim #3.

COUNT II

Charge: Criminal Sex Cond-4th Degree-16-17-Actor>48m old/Position of Authority

Minnesota Statute: 609.345.1(e)

Maximum Sentence: 10 years or \$20,000 or both

Offense Level: Felony

Offense Date (on or about): 01/01/2008 to 12/31/2009

Control #(ICR#): 23029312

Charge Description: on or between January 1, 2008 and December 31, 2009, in the County of St Louis, Minnesota, Jackson Michael Gatlin did engage in sexual contact with another person and the victim was at least 16 but less than 18 years of age and the defendant was more than 48 months older than the victim and in a position of authority over the victim, to wit: Victim #3.

The Complainant states that the following facts establish probable cause:

Complainant is a duly licensed peace officer and a member of law enforcement and knows the content of this Complaint to be true of his/her own knowledge and/or based on the reports of other peace officers. All of the conduct described herein occurred within the County of St. Louis, State of Minnesota, unless otherwise noted.

The following probable cause statement is offered to support charges against the Defendant as they relate to Victim 3.

The allegations in this complaint involve a religious institution with locations on West Arrowhead Road and East Superior Street. (Hereinafter "the Church") Both locations of the Church are within the City of Duluth, Saint Louis County. During the time period at issue, Michael Gatlin was the lead pastor at the Church. Michael Gatlin's wife, Brenda Gatlin, was also a senior pastor at the Church. Jackson Michael Gatlin, DOB 05/11/1988, Defendant herein, is the son of Michael and Brenda Gatlin. Defendant was involved with the Church in various capacities as a youth pastor from approximately 2006 to his suspension and termination in early 2023.

On October 6, 2022, C.C., a member of senior church leadership was approached by a former member of Defendant's youth group. This former youth group member informed C.C. that approximately 10 years prior, Defendant had been having sex with underage students in the youth group.

On October 11, 2022, C.C. brought this report to other senior members of church leadership.

On November 7, 2022, church leadership contacted an organization titled Godly Response to Abuse in the Christian Environment (GRACE). GRACE holds itself forth as an independent investigative organization that contracts with churches to investigate allegations of abuse.

On January 29, 2023, church leaders informed membership of the investigation into Defendant.

On January 30, 2023, local media outlets reported on the investigation into Defendant.

On January 31, 2023, C.C. made a report to the Duluth Police Department. Subsequent investigation by the Duluth Police Department revealed the following:

Victim 1

On January 31, 2023, Sergeant Hurst spoke to Victim 1, YOB 1991. Victim 1 reported that Defendant sexually assaulted her in the fall of 2007. At the time Victim 1 was 16 years old and Defendant was 19 years old. In the fall of 2007, Victim 1 had recently moved to Duluth with her family and began attending the Church. On the day in question, Defendant asked Victim 1 to come over to his house to watch football. Defendant assured Victim 1 his parents would be at the house as well. When they arrived at the house, Victim 1 noticed Defendant's parents were not home. Defendant told Victim 1 his parents must have gotten busy at the Church. Defendant brought Victim 1 upstairs to his bedroom. Once inside, Defendant locked the door behind him. Defendant took Victim 1's phone out of her hand and placed it on a high shelf out of reach. Victim 1 told Defendant she needed her phone because her mother might call her. Defendant laughed and told Victim 1 "they don't need to get a hold of you right now." Defendant pushed Victim 1 down onto a futon and pinned Victim 1's arms above her head with his left hand. Defendant used both of his

knees to hold Victim 1's hips and thighs down. Victim 1 described struggling with Defendant to get free while he held her down. Using his free hand, Defendant unzipped Victim 1's pants and penetrated her vagina with his fingers. Victim 1 told Defendant "No" and "I don't want this" while he was penetrating her. Defendant ignored her and laughed. Defendant only stopped when Victim 1 told him she needed something to drink. Defendant left the room, and Victim 1 ran out of the house. Victim 1 left her shoes behind, running barefoot down the street before hiding. Victim 1 called her mother to come pick her up.

During the week of February 6, 2023, Investigator Gonnerman spoke to Victim 1's mother. Victim 1's mother recalled Victim 1 asking to go to a "football watching thing" at the pastor's house. Approximately an hour later, Victim 1 called screaming and crying. Victim 1 told her mother that "the pastor's son attacked me" and "he tried to rape me." Victim 1 told her mother Defendant had held her down. Victim 1's mother found Victim 1 barefoot in the street crying. Victim 1's mother called Brenda Gatlin. Victim 1's mother told Brenda Gatlin that Defendant had just sexually assaulted Victim 1. Brenda Gatlin responded by saying "We know your daughter has issues" and hanging up the phone.

Victim 1's allegation is included to provide notice of the State's intent to offer it to show absence of mistake, intent, opportunity, and motive pursuant to *State v. Spreigl* and Minn. R. Evid. 404(b).

Victim 2

On February 2, 2023, Investigator Gonnerman met with Victim 2, YOB 1993. Victim 2 told Investigator Gonnerman about Defendant sexually assaulting her in April of 2009. In April of 2009, Defendant was 20 years old and Victim 2 was 16 years old. Defendant was aware of Victim 2's age and that Victim 2 was in 10th grade. Victim 2 met Defendant through a mutual friend, and initially spent time with him in group settings. Victim 2 and Defendant began flirting through text messages. On the day in question, Victim 2 and Defendant made plans to spend time at Defendant's house. Defendant picked Victim 2 up from her high school and drove her to his parents home in east Duluth. Victim 2 later confirmed with Investigator Gonnerman that the address of the home was on Pitt Street within the City of Duluth, Saint Louis County.

When Defendant and Victim 2 arrived at the Pitt Street address, Defendant took Victim 2 upstairs to a bedroom. Based upon the décor, Victim 2 believed this bedroom to be Defendant's parents' bedroom. Defendant and Victim 2 began kissing on the bed. After kissing for a short time Defendant left and returned with shoelaces, which Defendant used to tie Victim 2 to the bed. Defendant tied Victim 2's arms above her head, spaced slightly apart. After tying her hands, Defendant pulled Victim 2's pants down. Victim 2 told Defendant "No." Defendant smiled at Victim 2 and laughed. Defendant ignored Victim 2 telling him "No" and attempted to penetrate her vagina with his penis. Victim 2 had never had sexual intercourse before and recalled that this attempted penetration caused intense pain. Victim 2 was unsure if Defendant was successful in penetrating her vagina with his penis. Victim 2 eventually convinced Defendant to untie her to go to the bathroom, and he gave her a ride home.

Victim 2's allegation is included to provide notice of the State's intent to offer it to show absence of mistake, intent, opportunity, and motive pursuant to *State v. Spreigl* and Minn. R. Evid. 404(b).

Victim 3

On March 2, 2023, Investigator Gonnerman met with Victim 3, YOB 1993. Victim 3 told Investigator Gonnerman about a series of sexual interactions she had with Defendant during 2008 and 2009, when Victim 3 was 15-16 years old and Defendant was 20-21 years old. When Victim 3 was in 10th grade, she was a member of the Church youth group overseen by Defendant. Defendant would give Victim 3 rides to her home after youth group. When Defendant was driving Victim 3 home, they would be alone in his car. Defendant and Victim 3 would "make out" and Defendant would also fondle Victim 3's breasts and buttocks during these rides. Victim 3 recalled one ride in particular when Defendant fondled her breasts

and buttocks. Victim 3 was certain she was 15 years old during this ride.

Victim 4

On February 4, 2023, Investigator Gonnerman spoke to Victim 4, YOB 1996. Victim 4 was a member of the Church from the beginning of middle school to the end of high school. Victim 4 met Defendant in 2007 when she and participating in Defendant's youth group. Defendant began texting sexual messages to Victim 4. Defendant told Victim 4 that if she told anyone about these messages they would both be in trouble, that the police would talk to her, and that Defendant would get to jail and it would be her fault. When Victim 4 would question what was going on Defendant would tell her it was his role as a leader at the Church to teach her and show her the love of God.

Defendant would call and text Victim 4 late at night. Victim 4's parents found these messages, and brought them to Michael and Brenda Gatlin. The Gatlin's dismissed their concerns, accusing Victim 4's parents of being overprotective.

On multiple occasions, Defendant required Victim 4 to touch and stroke his erect penis with her bare feet. This touching occurred over Defendant's clothes.

Victim 4 described an assault that occurred during "The Big One," an annual youth group trip to the Twin Cities. On the bus, Defendant pulled Victim 4 away from her friends and made her sit with him at the back of the bus. Victim 4 was sitting by the window, with Defendant blocking her exit to the aisle. Defendant put his hands under Victim 4's shorts and penetrated her vagina with his fingers. Defendant took Victim 4's hand and put it on his erect penis under his shorts. Defendant made Victim 4 rub his penis with her hand, telling her she could get out of the seat "once you do this." Victim 4 believed this happened during the summer before or after the 7th grade.

On May 4, 2023, Investigator Gonnerman executed a search warrant at the Church. One of the documents Investigator Gonnerman collected and reviewed was a spreadsheet documenting registration and payment by youth group students for "The Big One" for the years 2010 and 2011. Victim 4 and Defendant's names are both found on this spreadsheet. In the summer of 2010, Victim 4 was 12 years old and Defendant was 22 years old.

Victim 4's allegation is included to provide notice of the State's intent to offer it to show absence of mistake, intent, opportunity, and motive pursuant to *State v. Spreigl* and Minn. R. Evid. 404(b).

Victim 5

On February 5, 2023, Officer Renier spoke to Victim 5, YOB 1995. Victim 5 told Officer Renier about a consensual sexual relationship she had with Defendant in 2009 and 2010. Victim 5 was 14-15 years old and Defendant was 21-22 years old during their relationship. Victim 5 attended the youth group at the Church. Victim 5 believed Defendant was the leader of that youth group. Within several weeks of Victim 5 joining the youth group, Defendant began messaging her and asking her to spend time with him. Defendant would sneak Victim 5 into the basement of his parents home. Victim 5 recalled the first time they had sexual intercourse was in the basement of Defendant's parents home on Pitt Street. Victim 5 and Defendant were watching TV and kissing. Defendant began touching Victim 5, and Victim 5 consented to sexual intercourse with Defendant. Defendant did not wear a condom. Victim 5 was 14 years old and Defendant was 21 years old during this first sexual encounter. Defendant and Victim 5 had consensual sexual intercourse several more times during their relationship. After several months, Victim 5 broke up with Defendant after she looked through his phone and found Defendant messaging and flirting with other girls in the youth group.

Victim 5's allegation is included to provide notice of the State's intent to offer it to show absence of

mistake, intent, opportunity, and motive pursuant to *State v. Spreigl* and Minn. R. Evid. 404(b).

Defendant's Status Within the Church

Multiple victims and witnesses described the culture of the Church as insular and controlling, with the Gatlins exerting a great deal of influence. There was a consistent impression that Defendant was immune from consequence because of his status as the pastor's child.

Investigator Gonnerman spoke to J.P. on multiple occasions. J.P. worked for the Church as a youth pastor during the time in question, running the junior high youth groups. Defendant was a volunteer youth leader on J.P.'s team. J.P. informed Investigator Gonnerman that Defendant received special privileges because of his parents status within the Church. Normally a volunteer youth leader would be subject to a vetting process before being allowed to work with youth. This process involved multiple meetings with J.P., a background check, and training. Defendant was not subject to this vetting process, instead being placed in a "lead" position within the youth group.

J.P. confirmed Defendant had authority over the students in the group. In regular youth group and on field trips like "The Big One," the students would have to listen to the volunteer leaders. If a student didn't listen to a volunteer leader, they would get in trouble.

J.P. recalled arriving to the church before youth group and finding Defendant and Victim 4 in private and secluded rooms on multiple occasions. The Church had rules prohibiting being alone with members of the opposite sex.

Investigator Gonnerman also spoke to K.S., the senior high youth group leader at the Church from 2004 to 2015. K.S. recalled Defendant being placed on the youth team over K.S.'s objection by Brenda Gatlin. K.S. caught Defendant giving young girls rides in his car on multiple occasions.

Investigator Gonnerman also spoke to B.M., a youth pastor at the Church during the time in question. B.M. recalled Defendant being moved from the senior high youth group to the junior high youth group for inappropriate behavior. B.M. recalled Defendant frequently giving young girls rides to and from youth group. When asked if he remembered any girls in particular, B.M. provided the name of Victim 5.

PLEASE TAKE NOTICE: Pursuant to Minn. Stat. 609.49., intentional failure to appear for duly scheduled court appearances may result in additional criminal charges, and in addition to any arrest warrant that may otherwise be issued by the Court.

SIGNATURES AND APPROVALS

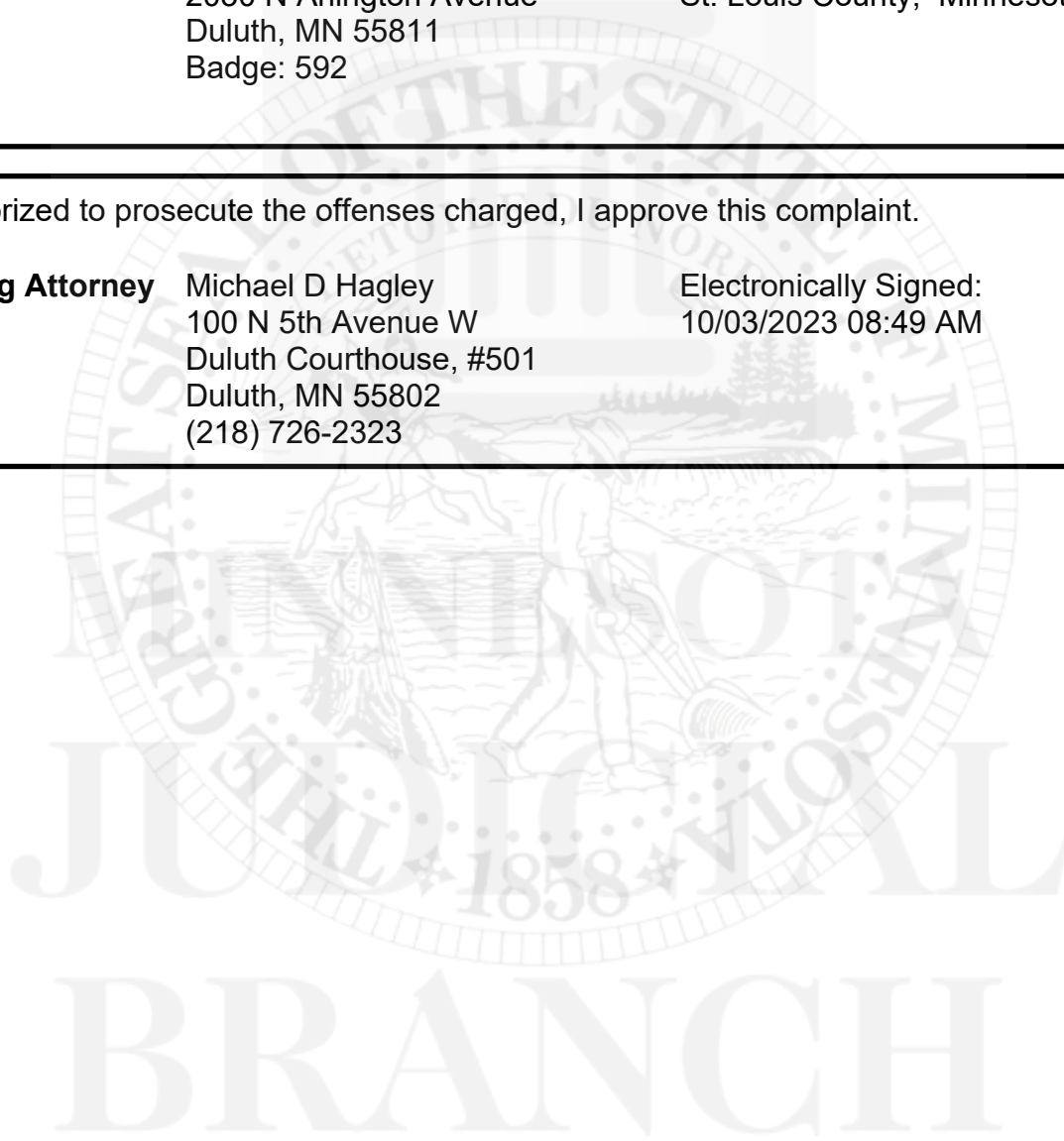
Complainant requests that Defendant, subject to bail or conditions of release, be:
(1) arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or
(2) detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according 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	Adam Gonnerman	Electronically Signed:
	Police Officer	10/03/2023 09:12 AM
	2030 N Arlington Avenue	St. Louis County, Minnesota
	Duluth, MN 55811	
	Badge: 592	

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

Prosecuting Attorney	Michael D Hagley	Electronically Signed:
	100 N 5th Avenue W	10/03/2023 08:49 AM
	Duluth Courthouse, #501	
	Duluth, MN 55802	
	(218) 726-2323	



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: \$
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: October 3, 2023.

Judicial Officer

Mark M Starr
Judge

Electronically Signed: 10/03/2023 09:45 AM

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

**COUNTY OF ST. LOUIS
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Jackson Michael Gatlin

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:

69DU-CR-23-2646
DEFENDANT FACT SHEET

Filed in District Court
State of Minnesota
10/3/2023

Name: Jackson Michael Gatlin
DOB: 05/11/1988
Address: 4501 Pitt Street
Duluth, MN 55804

Alias Names/DOB:

SID:

Height:

Weight:

Eye Color:

Hair Color:

Gender:

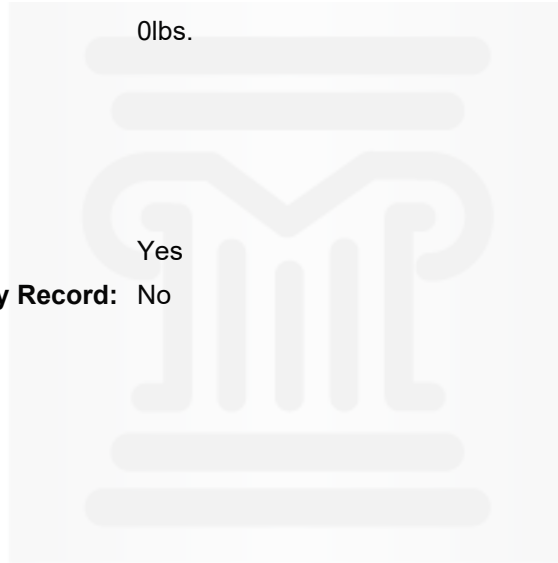
Race:

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: No

Driver's License #:

Alcohol Concentration:



MINNESOTA
JUDICIAL
BRANCH

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	1/1/2008	609.345.1(b) Criminal Sex Cond-4th Degree-Victim 13-15-Act >48m Old	Felony	L7000		MN0690600	23029312
2	Charge	1/1/2008	609.345.1(e) Criminal Sex Cond-4th Degree-16-17-Actor>48m old/Position of Authority	Felony	L7000		MN0690600	23029312



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