

State of Minnesota,

Plaintiff,

vs.

BRUCE DOUGLAS KONOLD DOB: 07/01/1961

500 Chapel Court
Eagan, MN 55121

Defendant.

COMPLAINT

Warrant

Amended

Filed in District Court
State of Minnesota

04/08/24 -05:00

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 Sexual Conduct in the 4th Degree (Clergy) (Ongoing Religious Advice)

Minnesota Statute: 609.345.1(I)(ii), with reference to: 609.345.2

Maximum Sentence: 0-10 Years and/or \$6,000.00 - \$20,000.00

Offense Level: Felony

Offense Date (on or about): 10/22/2020

Control #(ICR#): 22001265

Charge Description: On or about October 22, 2020, in the County of Dakota, Minnesota, BRUCE DOUGLAS KONOLD did engage in sexual contact with another person, and the actor was or purported to be a member of the clergy, the complainant was not married to the actor, and the sexual contact occurred during a period of time in which the complainant was meeting on an ongoing basis with the actor to seek or receive religious or spiritual advice, aid, or comfort in private.

COUNT II

Charge: Criminal Sexual Conduct in the 4th Degree (Clergy) (Ongoing Religious Advice)

Minnesota Statute: 609.345.1(I)(ii), with reference to: 609.345.2

Maximum Sentence: 0-10 Years and/or \$6,000.00 - \$20,000.00

Offense Level: Felony

Offense Date (on or about): 03/10/2021

Control #(ICR#): 22001265

Charge Description: On or about March 10, 2021, in the County of Dakota, Minnesota, BRUCE DOUGLAS KONOLD did engage in sexual contact with another person, and the actor was or purported to be a member of the clergy, the complainant was not married to the actor, and the sexual contact occurred during a period of time in which the complainant was meeting on an ongoing basis with the actor to seek or receive religious or spiritual advice, aid, or comfort in private.

COUNT III

Charge: Criminal Sexual Conduct in the 3rd Degree (Clergy) (Ongoing Meeting for Advice)

Minnesota Statute: 609.344.1(l)(ii), with reference to: 609.344.2(1)

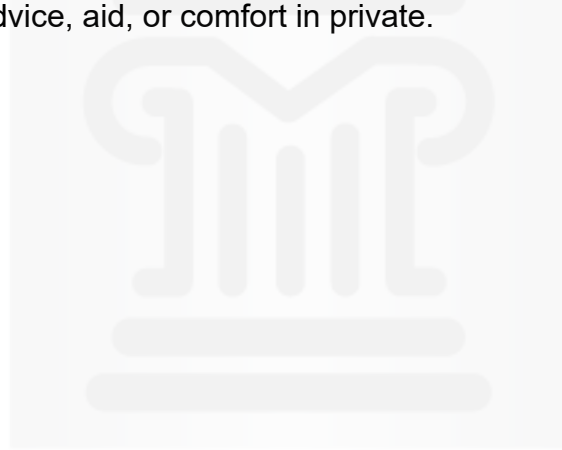
Maximum Sentence: 0-15 Years and/or \$9,000.00 - \$30,000.00

Offense Level: Felony

Offense Date (on or about): 05/27/2021

Control #(ICR#): 22001265

Charge Description: On or about May 27, 2021, in the County of Dakota, Minnesota, BRUCE DOUGLAS KONOLD did engage in sexual penetration with another person, and the actor was or purported to be a member of the clergy, the complainant is not married to the actor, and the sexual penetration occurred during a period of time in which the complainant was meeting on an ongoing basis with the actor to seek or receive religious or spiritual advice, aid, or comfort in private.



MINNESOTA
JUDICIAL
BRANCH

STATEMENT OF PROBABLE CAUSE

On March 11, 2022, a 20-year old female (herein Victim 1) provided a statement to law enforcement where she disclosed being sexually assaulted by her pastor, BRUCE DOUGLAS KONOLD, dob: 07/01/1961 (herein Defendant). For approximately 30 years, Defendant was a pastor of an Eagan church in Dakota County, Minnesota. Victim 1 began attending the church on January 31, 2021. After the first service, Defendant started regularly inviting Victim 1 to his Eagan home with other church members.

In February of 2021, Defendant brought Victim 1 out to his garage. Defendant told Victim 1 that he knew she needed a father figure and that he would like to be that for her. Defendant started providing spiritual counseling and guidance to Victim 1 on a regular basis. During Victim 1's college break in March of 2021, Defendant suggested that Victim 1 stay at their home. On March 10, 2021, Defendant provided Victim 1 several drinks. Victim 1 was under the legal drinking age at the time and had never consumed alcohol. Victim 1 recalls feeling foggy and had difficulty walking. Defendant suggested that they watch television. While Victim 1 was sitting on the couch, Defendant started touching the outside of her genitals. When Victim 1 tried to go to bed, Defendant followed her into her bedroom and tried multiple times to remove her clothing. After Victim 1 pushed Defendant away several times he finally left. Following that incident, Defendant started to regularly message Victim 1 sexual messages.

Towards the end of the 2021 school year, Defendant suggested that Victim 1 move into their home and obtained her a cleaning job at the church. On May 27, 2021, Defendant vaginally penetrated Victim 1 for the first time. Defendant then started regularly engaging in sex acts with Victim 1. The acts included vaginal penetration, digital penetration, and oral sex. The acts occurred at Defendant's home, the church, Defendant's vehicle, and hotels. The acts continued regularly until December of 2021.

Victim 1 described conflicting emotions about the incidents explaining that there were certain incidents that didn't feel consensual. Defendant began telling Victim 1 that if she ever came forward about what was happening that it would be because she hated him or wanted to destroy him. Defendant started regularly making comments about him wanting to commit suicide and would send photos of him holding his gun and several times brought his gun with him while he was driving Victim 1 around. One time, Defendant told Victim 1 "what if we both just died and that would take care of it."

In December of 2021, Victim 1 stopped attending the church after Defendant's wife, approached Victim 1 and told her to never show her face again at the church and to disappear completely.

On March 1, 2022, defendant's wife sent Victim 1 the following message: "Bruce told me everything. I already knew lots of it. His phone is shut off and he will no longer respond to you. I suggest you find someone to help you through this. Do not contact me or MY husband."

On March 9, 2022, a 30-year old female (herein Victim 2) contacted the Eagan Police Department to report a sexual assault. On March 15, 2022, law enforcement spoke to Victim 2 who reported the following facts. Victim 2 and her husband attended Defendant's church for approximately 10 years. In 2020, Defendant offered Victim 2 a personal assistant position at the church.

On October 22, 2020, while at Victim 2's home, Defendant told her he was smitten with her. While they were seated on the couch, Defendant reached up under Victim 2's clothing and started rubbing her breasts. After Victim 2 told Defendant that they each should work on their respective marriages, Defendant left.

Soon afterwards in November of 2020, Defendant started pressuring Victim 2 for a kiss and later for sex. Defendant started begging Victim 2 not to leave the church or tell the church elders. Defendant started making suicidal comments when Victim 2 would reject him. Defendant would text Victim 2 that he was looking for sharp knives in the kitchen or staring at his loaded gun at the church office or at home. Defendant told Victim 2 that she was selfish because he had been meeting her emotional needs, but she was refusing to meet his needs.

After promising to leave Victim 2 alone afterwards, she agreed to have sex. Victim 2 and Defendant met at a hotel out of town on November 23, 2020 and had sexual intercourse.

Later that same month, Defendant and Victim 2 went hunting. While on the way to the hunting cabin, Defendant pulled the vehicle over and Defendant and Victim 2 had sexual intercourse for a second time. While at the hunting site, Defendant and Victim had sexual intercourse for a third time.

Victim 2 described numerous instances of sexual contact including Defendant fondling Victim 2's genital areas. These instances would usually occur in Defendant's vehicle around the area of the church, in Lebanon Hills park, a dirt road in Rosemount, and in the Victim 2's home. The acts continued until January of 2021. Victim 2 reported that between July of 2020-October of 2020, she and defendant met regularly to discuss issues of faith, as well as issues related to her marriage.

On March 27, 2022, law enforcement spoke to Defendant. Defendant admitted engaging in a sexual relations with Victim 2 approximately 15 times between November of 2020 and January of 2021. Defendant admitted engaging in

sexual relations with Victim 2 at both Victim 2's home and on the hunting trip. Defendant expressed concerns about the church supporting Victim 2's current mission work saying that "it was not right that they continue to support an adulteress" and quoted a bible verse regarding adulterous women being "stoned".

Defendant described his relationship with Victim 1 as "another adulterous relationship" and stated that he had sexual intercourse with her over 100 times during a 9 to 10-month period. Defendant did not answer the question of whether he considered Victim 1 as someone seeking spiritual counseling directly but admitted that Victim 1 thought of him as a father figure and explained that his conversations are spiritual given that he is considered one of the foremost experts in world religions.

On April 6, 2022, Victim 1 left a message for law enforcement indicating that she had felt pressured to come forward and was no longer sure about whether she had been sexually abused.

On April 29, 2022, Victim 1's new pastor contacted law enforcement and stated that Defendant had been aggressively pursuing Victim 1 by showing up at her home, work, and school. The pastor explained that Defendant had been leaving Victim 1 notes and texting her constantly and reported that Defendant had been using threats of suicide to manipulate Victim 1 into continuing a sexual relationship.

Law enforcement then spoke to Victim 1 who confirmed that Defendant had been regularly harassing her after learning about the police report. Victim 1 described an incident where Defendant approached her car and asked why she wanted him to go to jail and kept talking about how he had lost everything. Defendant told Victim 1 that she could tell the police that it wasn't abuse. Law enforcement contacted Defendant who admitted being in contact with Victim 1.

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

Steve Lounsbury
Officer
3830 Pilot Knob Rd
Eagan, MN 55122
Badge: 82

Electronically Signed:
04/05/2024 03:49 PM
Dakota County, Minnesota

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

Prosecuting Attorney

Emily Froehle
attorney
1560 Hwy 55
Hastings, MN 55033-2392
(651) 438-4438

Electronically Signed:
04/05/2024 03:15 PM

MINNESOTA
JUDICIAL
BRANCH

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: bail already posted with conditions

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: April 5, 2024.

Judicial Officer

Timothy J. McManus
Judge of District Court

Electronically Signed: 04/05/2024 03:53 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.

Bruce Douglas Konold

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.*

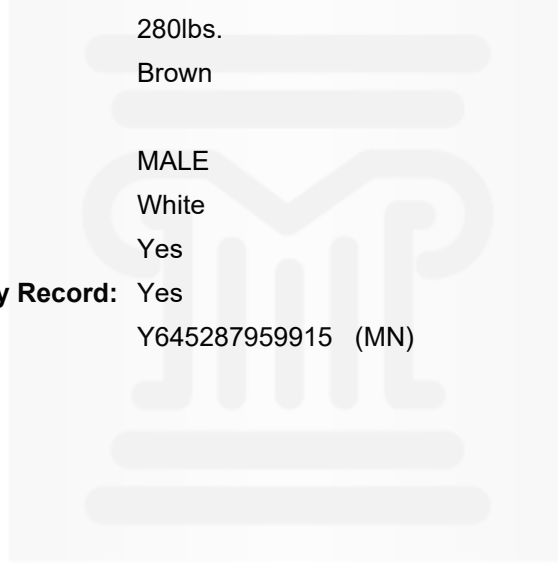
Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

Name: Bruce Douglas Konold
DOB: 07/01/1961
Address: 500 Chapel Court
Eagan, MN 55121

Alias Names/DOB:

SID: MN22DQ6061
Height: 6' 2"
Weight: 280lbs.
Eye Color: Brown
Hair Color:
Gender: MALE
Race: White
Fingerprints Required per Statute: Yes
Fingerprint match to Criminal History Record: Yes
Driver's License #: Y645287959915 (MN)
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	10/22/2020	609.345.1(l)(ii) Criminal Sex Cond-4th Degree-Clergy-Ongoing Religious Advice	Felony	L70A7	N	MN0190800	22001265
	Penalty	10/22/2020	609.345.2 Criminal Sex Cond-4th Degree-Penalty	Felony	L70A7	N	MN0190800	22001265
2	Charge	3/10/2021	609.345.1(l)(ii) Criminal Sex Cond-4th Degree-Clergy-Ongoing Religious Advice	Felony	L70A7	N	MN0190800	22001265
	Penalty	3/10/2021	609.345.2 Criminal Sex Cond-4th Degree-Penalty	Felony	L70A7	N	MN0190800	22001265
3	Charge	5/27/2021	609.344.1(l)(ii) Criminal Sex Cond-3rd Degree-Clergy-Ongoing Meet f/Advice	Felony	L51A7	N	MN0190800	22001265
	Penalty	5/27/2021	609.344.2(1) Criminal Sexual Conduct-3rd Degree-Penalty	Felony	L51A7	N	MN0190800	22001265

MINNESOTA
 JUDICIAL
 BRANCH