

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No.
Court File No.

19A03741
27-CR-19-7715

State of Minnesota,

Plaintiff,

vs.

MATTHEW GORDON BOWERS DOB: 02/08/1984

311 VAN BUREN AVENUE NORTH
HOPKINS, MN 55343

Defendant.

COMPLAINT

Order of Detention

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 Conduct-5th Degree-Lewd Exhibition-Under 16 Present

Minnesota Statute: 609.3451.1(2), with reference to: 609.3451.2

Maximum Sentence: 1 YEAR AND/OR \$3,000

Offense Level: Gross Misdemeanor

Offense Date (on or about): 12/01/2018

Control #(ICR#): 19012464

Charge Description: That between December 1, 2018 and December 25, 2018, in Hennepin County, Minnesota, Matthew Gordon Bowers engaged in masturbation or lewd exhibition of the genitals in the presence of a minor under the age of 16, knowing or having reason to know the minor was present.

COUNT II

Charge: Indecent Exposure/Lewdnessor procure another to expose in presence of minor under 16

Minnesota Statute: 617.23.2(1), with reference to: 617.23.2

Maximum Sentence: 1 YEAR AND/OR \$3,000

Offense Level: Gross Misdemeanor

Offense Date (on or about): 12/01/2018

Control #(ICR#): 19012464

Charge Description: That between December 1, 2018 and December 25, 2018 in Hennepin County, Minnesota, in a public place or a place where others were present, Matthew Gordon Bowers willfully and lewdly exposed his body or private parts thereof or engaged in open or gross lewdness or lascivious behavior or other public indecency in the presence of a minor under the age of 16.

COUNT III

Charge: Criminal Sex Conduct-5th Degree-Lewd Exhibition-Under 16 Present

Minnesota Statute: 609.3451.1(2), with reference to: 609.3451.2

Maximum Sentence: 1 YEAR AND/OR \$3,000

Offense Level: Gross Misdemeanor

Offense Date (on or about): 03/19/2019

Control #(ICR#): 19012464

Charge Description: That on or about 3/19/2019, in Hennepin County, Minnesota, Matthew Gordon Bowers engaged in masturbation or lewd exhibition of the genitals in the presence of a minor under the age of 16, knowing or having reason to know the minor was present.

COUNT IV

Charge: Indecent Exposure/Lewdnessor procure another to expose in presence of minor under 16

Minnesota Statute: 617.23.2(1), with reference to: 617.23.2

Maximum Sentence: 1 YEAR AND/OR \$3,000

Offense Level: Gross Misdemeanor

Offense Date (on or about): 03/19/2019

Control #(ICR#): 19012464

Charge Description: That on or about 3/19/2019, in Hennepin County, Minnesota, in a public place or a place where others were present, Matthew Gordon Bowers willfully and lewdly exposed his/her body or private parts thereof or engaged in open or gross lewdness or lascivious behavior or other public indecency in the presence of a minor under the age of 16.

STATEMENT OF PROBABLE CAUSE

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

On March 22, 2019, Plymouth Police began an investigation into indecent exposure by an employee at an elementary school in Plymouth, Hennepin County, Minnesota. The employee was identified as MATTHEW GORDON BOWERS, DOB: 02/08/1984, Defendant herein.

After she was picked up from the afterschool program, a seven-year-old student, "Child 1," reported to her mother that she had seen "Mr. B's penis" at school. Child 1 reported that two other girls, eight-year-old "Child 2" and seven-year-old "Child 3," also saw Defendant's penis.

Child 1 and Child 2 were forensically interviewed at CornerHouse. Both children reported that they, along with Child 3, had been on a large swing on the playground, and Defendant was pushing them on "pajama day" (identified as March 19, 2019) at school. Defendant was wearing red pajamas with zippers. Child 1 said that "it felt to us like he wanted us to unzip it," and the girls unzipped the bottom zipper of Defendant's pajamas. Defendant was not wearing any underwear, and Child 1 and Child 2 both reported that they saw his penis as well as his pierced bellybutton. Child 1 stated that, when they unzipped his pajamas, Defendant "didn't say anything and didn't stop doing what he was doing, he just kept pushing the swing" with his penis exposed. Both Child 1 and Child 2 described seeing Defendant's penis moving around as he pushed them on the swing.

Child 1 and Child 2 both described a previous incident that happened in the school library "a little before winter break." Child 1 said that they pulled Defendant's pants down "only a little bit," and Defendant then "pulled them down farther." Child 1 described Defendant being "in a squat position" and seeing Defendant's "butt" and penis. After Child 2 described the incident on the swing, the interviewer asked if she had seen Defendant's private parts any other times, and Child 2 said "yeah" and described being in the same area of the library that Child 1 described. Child 2 also said Defendant was "squatting" during that incident.

In an earlier conversation with school district administration, Defendant said that he had been pushing the girls on a swing on March 19th and that they were grabbing at the zipper on his pajamas. Defendant said that one of the children unzipped his pajamas. Defendant claimed he immediately stopped pushing them and told them that was inappropriate and then walked away from them.

On April 1, 2019, Plymouth Police executed a search warrant on Defendant's home and recovered pajamas and other clothing that matched the children's descriptions. Police also seized a piece of body jewelry matching the shape and color described by Child 1 and Child 2. Defendant declined to give a statement to investigators.

Defendant is in custody.

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

Amy Goodwin
Patrol Officer
3400 Plymouth Blvd
Plymouth, MN 55447-1482
Badge: 87

Electronically Signed:
04/03/2019 11:52 AM
Hennepin County, Minnesota

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

Prosecuting Attorney

Paige L Starkey
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
04/03/2019 11:40 AM

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 on _____, _____ at _____ AM/PM before the above-named court at 300 S Sixth Street, Minneapolis, MN 55487 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: \$6,000.00

Conditions of Release: No Contact with Minors/Males/Females under age of 18; No Contact with Address; No Possession of Weapons; Make All Appearances; Remain Law Abiding; No Contact with Witnesses

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 3, 2019.

Judicial Officer

Ivy S. Bernhardson
District Court Judge

Electronically Signed: 04/03/2019 11:56 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.

Matthew Gordon Bowers

Defendant

*LAW ENFORCEMENT OFFICER RETURN OF SERVICE
I hereby Certify and Return that I have served a copy of this Order of
Detention upon the Defendant herein named.*

Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

Name: Matthew Gordon Bowers
DOB: 02/08/1984
Address: 311 VAN BUREN AVENUE NORTH
HOPKINS, MN 55343

Alias Names/DOB:

SID: MN19BJ8857

Height:

Weight:

Eye Color:

Hair Color:

Gender: MALE

Race: White

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: Yes

Driver's License #:

SILS Person ID #: 779817

SILS Tracking No. 3092380

Alcohol Concentration:

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	12/1/2018	609.3451.1(2) Criminal Sex Conduct-5th Degree-Lewd Exhibition-Under 16 Present	Gross Misdemeanor	LAC51		MN0271700	19012464
	Penalty	12/1/2018	609.3451.2 Criminal Sex Cond-5th Deg-Nonconsensual Sexual Contact/Lewd Exhibition-Under 16 Present - Penalty	Gross Misdemeanor	LAC51		MN0271700	19012464
2	Charge	12/1/2018	617.23.2(1) Indecent Exposure/Lewdnessor procure another to expose in presence of minor under 16	Gross Misdemeanor	O2691		MN0271700	19012464
	Penalty	12/1/2018	617.23.2 Indecent Exposure-Gross Misdemeanor	Gross Misdemeanor	O2691		MN0271700	19012464
3	Charge	3/19/2019	609.3451.1(2) Criminal Sex Conduct-5th Degree-Lewd Exhibition-Under 16 Present	Gross Misdemeanor	LAC51		MN0271700	19012464
	Penalty	3/19/2019	609.3451.2 Criminal Sex Cond-5th Deg-Nonconsensual Sexual Contact/Lewd Exhibition-Under 16 Present - Penalty	Gross Misdemeanor	LAC51		MN0271700	19012464
4	Charge	3/19/2019	617.23.2(1) Indecent Exposure/Lewdnessor procure another to expose in presence of minor under 16	Gross Misdemeanor	O2691		MN0271700	19012464
	Penalty	3/19/2019	617.23.2 Indecent Exposure-Gross Misdemeanor	Gross Misdemeanor	O2691		MN0271700	19012464