

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 17A11291
Court File No. 27-CR-17-22942

State of Minnesota,

Plaintiff,

vs.

DAVID EDWARD CAMPBELL DOB: 07/26/1958

NPA

Defendant.

COMPLAINT

Order of Detention

☒ Amended

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-3rd Degree-Force or Coercion

Minnesota Statute: 609.344.1(c), with reference to: 609.101.2, 609.3455.7, 609.3455.10, 609.3455.6, 609.344.2(1)

Maximum Sentence: 15 YEARS AND/OR \$10,000-\$30,000 PLUS TEN YEAR-LIFETIME CONDITIONAL RELEASE

Offense Level: Felony

Offense Date (on or about): 01/07/2017

Control #(ICR#): 17010592

Charge Description: That between the dates of January 7, 2017 and September 8, 2017, in Hennepin County, Minnesota, DAVID EDWARD CAMPBELL dob: 7/26/1958, engaged in sexual penetration with Victim, using force or coercion to accomplish the penetration.

COUNT II

Charge: Criminal Sex Conduct-3rd Degree-Significant Relationship-Vict 16-17

Minnesota Statute: 609.344.1(f), with reference to: 609.101.2, 609.3455.7, 609.3455.10, 609.3455.6, 609.344.2(1)

Maximum Sentence: 15 YEARS AND/OR \$10,000-\$30,000 PLUS MINIMUM TEN YEAR CONDITIONAL RELEASE

Offense Level: Felony

Offense Date (on or about): 01/07/2017

Control #(ICR#): 17010592

Charge Description: That between the dates of January 7, 2017 and September 8, 2017, in Hennepin County, Minnesota, DAVID EDWARD CAMPBELL DOB:07/26/1958, engaged in sexual penetration with Victim, a person at least sixteen (16) but under eighteen (18) years of age at the time of the sexual penetration, and DAVID EDWARD CAMPBELL, as defined in Minn. Stat. 609.341, Subd. 15(3), is an

adult who jointly resided intermittently or regularly in the same dwelling as the Victim.

COUNT III

Charge: Criminal Sex Conduct-3rd Degree-16-17-Act >48 old-Position Authority

Minnesota Statute: 609.344.1(e), with reference to: 609.101.2, 609.3455.7, 609.3455.10, 609.3455.6, 609.344.2(1)

Maximum Sentence: 15 YEARS AND/OR \$10,000-\$30,000 PLUS MINIMUM TEN YEAR CONDITIONAL RELEASE

Offense Level: Felony

Offense Date (on or about): 01/07/2017

Control #(ICR#): 17010592

Charge Description: That between the dates of January 7, 2017 and September 8, 2017, in Hennepin County, Minnesota, DAVID EDWARD CAMPBELL DOB: 07/26/1958, who was in a position of authority over the Victim, engaged in sexual penetration with Victim, a person at least sixteen (16) years but less than eighteen (18) years of age, and more than forty-eight months younger than DAVID EDWARD CAMPBELL.

COUNT IV

Charge: Criminal Sex Cond-4th Degree-Victim 16-17-Significant Relationship

Minnesota Statute: 609.345.1(f), with reference to: 609.345.2, 609.101.2, 609.3455.10, 609.3455.6

Maximum Sentence: 10 YEARS AND/OR \$6,000-\$20,000 PLUS TEN YEAR CONDITIONAL RELEASE

Offense Level: Felony

Offense Date (on or about): 01/07/2017

Control #(ICR#): 17010592

Charge Description: That between the dates of January 7, 2017 and September 8, 2017, in Hennepin County, Minnesota, DAVID EDWARD CAMPBELL DOB: 07/26/1958, engaged in sexual contact, to wit the touching of Victim's breast, with the Victim, a person at least sixteen years but under eighteen years of age at the time of the sexual contact, and DAVID EDWARD CAMPBELL is an adult who jointly resided intermittently or regularly in the same dwelling as the Victim.

COUNT V

Charge: Criminal Sex Cond-4th Degree-Victim 16-17-Significant Relationship

Minnesota Statute: 609.345.1(f), with reference to: 609.345.2, 609.101.2, 609.3455.10, 609.3455.6

Maximum Sentence: 10 YEARS AND/OR \$6,000-\$20,000 PLUS TEN YEAR CONDITIONAL RELEASE

Offense Level: Felony

Offense Date (on or about): 01/07/2017

Control #(ICR#): 17010592

Charge Description: That between the dates of January 7, 2017 and September 8, 2017, in Hennepin County, Minnesota, DAVID EDWARD CAMPBELL, born 07/26/1958, engaged in sexual contact, to wit: causing the Victim to touch his penis, with the victim, a person at least sixteen years but under eighteen years of age at the time of the sexual contact, and DAVID EDWARD CAMPBELL is an adult who jointly resided intermittently or regularly in the same dwelling as the Victim.

COUNT VI

Charge: Terroristic Threats-Reckless Disregard Risk

Minnesota Statute: 609.713.1, with reference to: 609.713.1

Maximum Sentence: 5 YEARS AND/OR \$10,000

Offense Level: Felony

Offense Date (on or about): 01/07/2017

Control #(ICR#): 17010592

Charge Description: That between the dates of January 7, 2017 and September 8, 2017, in Hennepin County, Minnesota, DAVID EDWARD CAMPBELL did threaten to commit a crime of violence with the purpose of terrorizing another, and/or in reckless disregard of the risk of causing terror in another, Victim.

COUNT VII

Charge: Stalking - Pattern of Stalking Conduct

Minnesota Statute: 609.749.5(a), with reference to: 609.749.5(a)

Maximum Sentence: 10 YEARS AND/OR \$20,000

Offense Level: Felony

Offense Date (on or about): 09/06/2017

Control #(ICR#): 17010592

Charge Description: That on or about 9/6/2017, in Hennepin County, Minnesota, DAVID EDWARD CAMPBELL engaged in a pattern of stalking conduct with respect to victim in a manner that would cause a reasonable person under the circumstances to feel terrorized or to fear bodily harm and that did cause this reaction on the part of the victim.

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STATEMENT OF PROBABLE CAUSE

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

On or about September 7, 2017, Detective Koosmann of the Bloomington Police Department was assigned a case involving suspected criminal sexual conduct of a minor female. Koosmann met with a sixteen year-old known female (DOB: 1/7/2001), Victim herein, and her boyfriend, a seventeen year-old known male (DOB: 1/3/2000), Witness herein, along with a social worker at a school located in St. Paul, Minnesota.

Koosmann learned that the school social worker received a report from Victim that she was being sexually abused by her boyfriend's father, identified as Defendant, DAVID EDWARD CAMPBELL (DOB: 7/26/1958), who is employed as a Minneapolis Police Officer. Koosmann further learned that some of the reported sexual abuse occurred within Bloomington, Hennepin County, State of Minnesota, including most recently at the La Quinta Hotel on Nicollet Ave South.

Koosmann learned that Victim lived with Defendant as she was dating his son, Witness herein, and that the family lived at the La Quinta Hotel for the past couple months. Prior to that, they lived at the Crown Plaza in Bloomington, the Radisson Hotel in Roseville and the Aloft Hotel in Minneapolis. Koosmann learned that Victim reported incidents occurring at several of these locations. It was learned that there were also incidents that occurred in Minneapolis during ride-alongs the Victim did with Defendant in his squad car while he was on duty.

On September 8, 2017, Victim was interviewed by Barbara Kern-Pieh, a forensic interviewer at CornerHouse. During that interview, Victim reported that she was living with Defendant, his wife, and several children, including Witness. Victim reported that beginning around February 2017, Defendant asked her about her bra size and bought her lace bras and underwear from Victoria's Secret at the Mall of America. Witness was present when this occurred and reported that he thought it was suspicious that Defendant purchased Victim these things.

Victim reported that Defendant began requesting photographs of her wearing the underwear he had purchased for her, and told her to take the photos on his phone while she was in the bathroom at the Radisson hotel where they lived for a period of time. Victim obeyed and Defendant told her that he placed the photos into a "Safe App" on his personal phone that only he could get to. At this same hotel, Defendant exposed his naked penis to her.

Victim reported that Defendant would take her on ride-alongs in his squad car when he worked. She reported that on one such ride-along in Minneapolis, he began touching her breasts and put his hand under her bra before then kissing her breasts. Victim reported being fearful of Defendant, and he told her to get out of the car, which she did. Defendant then continued to fondle her and then stuck his hands down her pants and put two fingers inside her vagina, telling her "you like it." Defendant also told Victim to "stop resisting" when she tried to push him away. Defendant would not stop despite the Victim repeatedly telling him to. Defendant then took Victim's hand and placed it on his erect penis over his Minneapolis Police uniform. Defendant was wearing his full duty belt at the time.

Victim reported another ride-along where Defendant took her into a dark city park area near railroad tracks in Northeast Minneapolis and touched and kissed her naked breasts. Victim drew a diagram of the area.

Victim reported that Defendant told her on one ride-along that if she told on him, that would get him in

trouble or get his kids taken away, he would have to shoot her in the head. Victim remains very fearful that Defendant will hurt her, especially now having reported what has been occurring.

Victim reported that Defendant, in March, approached her while she was sitting on a staircase at the La Quinta hotel, and moved her under the staircase. Defendant then told her to lift up her bra and he began touching and kissing her on her breasts.

Victim stated that she went with Defendant and the family to a Pow-Wow in South Dakota. Victim did not want to be alone with Defendant and she told Witness what Defendant had been doing to her. Witness confronted Defendant, who appeared very nervous and tried to get the two of them to a more private area to discuss the matter. Both she and Witness refused, fearing Defendant would hurt them.

Officers arrested Defendant on September 8, 2017, in his vehicle. During a search incident to arrest, officers located a large black fixed blade knife and a magazine containing six .45 caliber rounds in the center console of his personal vehicle. Officers also located "Freeze and P" in the glove box. Officers also seized two cellular devices.

On September 9, 2017, officers attempted to speak with Defendant, who declined to speak with officers. Officers then indicated they had a search warrant for Defendant's phones, including passcodes. Defendant provided the passcode to his work phone immediately. When asked for his passcode for his personal phone, he claimed he could not remember it and then refused to provide it.

Defendant is in custody.

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SIGNATURES AND APPROVALS

Complainant requests that Defendant, subject to bail or conditions of release, be:
(1) arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or
(2) detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.

Complainant declares under penalty of perjury that everything stated in this document is true and correct. Minn. Stat. § 358.116; Minn. R. Crim. P. 2.01, subds. 1, 2.

Complainant

Kerri Nolden
Detective
1800 W Old Shakopee Road
Bloomington, MN 55431
Badge: 237

Electronically Signed:
09/05/2018 12:22 PM
Hennepin County, Minnesota

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

Prosecuting Attorney

Thad Tudor
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
08/29/2018 08:27 AM

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FINDING OF PROBABLE CAUSE

From the above sworn facts, and any supporting affidavits or supplemental sworn testimony, I, the Issuing Officer, have determined that probable cause exists to support, subject to bail or conditions of release where applicable, Defendant's arrest or other lawful steps be taken to obtain Defendant's appearance in court, or Defendant's detention, if already in custody, pending further proceedings. Defendant is therefore charged with the above-stated offense(s).

☐ SUMMONS

THEREFORE YOU, THE DEFENDANT, ARE SUMMONED to appear 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: \$250,000.00

Conditions of Release: No Contact with Victim; No Contact with Witnesses; No Contact with Minors/Males/Females under age of: no contact with minors; No use of drugs/alcohol; Random UAs; No Possession of Weapons; Remain Law Abiding; Make All Appearances

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: September 5, 2018.

Judicial Officer

Edward Thomas Wahl
District Court Judge

Electronically Signed: 09/05/2018 02:02 PM

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

COUNTY OF HENNEPIN
STATE OF MINNESOTA

State of Minnesota

Plaintiff

vs.

DAVID EDWARD CAMPBELL

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: DAVID EDWARD CAMPBELL
DOB: 07/26/1958
Address: NPA

Alias Names/DOB:
SID: MN07675035
Height:
Weight:
Eye Color:
Hair Color:
Gender: MALE
Race: American Indian
Fingerprints Required per Statute: Yes
Fingerprint match to Criminal History Record: Yes
Driver's License #:
SILS Person ID #: 104961
SILS Tracking No. 2965804
Alcohol Concentration:

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STATUTE AND OFFENSE GRID

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	1/7/2017	609.344.1(c) Criminal Sex Conduct-3rd Degree-Force or Coercion	Felony	L5355		MN0270100	17010592
	Definition	1/7/2017	609.3455.6 Dangerous Sex Offenders - Ten Year Conditional Release	No-Level	L5355		MN0270100	17010592
	Penalty	1/7/2017	609.344.2(1) Criminal Sexual Conduct-3rd Degree-Penalty	Felony	L5355		MN0270100	17010592
	Definition	1/7/2017	609.3455.10 Dangerous Sex Offenders - Presumptive Executed Sentence for Repeat Sex Offenders	No-Level	L5355		MN0270100	17010592
	Definition	1/7/2017	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	L5355		MN0270100	17010592
	Definition	1/7/2017	609.3455.7 Dangerous Sex Offenders - Lifetime Conditional Release	No-Level	L5355		MN0270100	17010592
2	Charge	1/7/2017	609.344.1(f) Criminal Sex Conduct-3rd Degree-Significant Relationship-Vict 16-17	Felony	L5115		MN0270100	17010592
	Definition	1/7/2017	609.3455.6 Dangerous Sex Offenders - Ten Year Conditional Release	No-Level	L5115		MN0270100	17010592
	Penalty	1/7/2017	609.344.2(1) Criminal Sexual Conduct-3rd Degree-Penalty	Felony	L5115		MN0270100	17010592
	Definition	1/7/2017	609.3455.10 Dangerous Sex Offenders - Presumptive Executed Sentence for Repeat Sex Offenders	No-Level	L5115		MN0270100	17010592
	Definition	1/7/2017	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	L5115		MN0270100	17010592
	Definition	1/7/2017	609.3455.7 Dangerous Sex Offenders - Lifetime Conditional Release	No-Level	L5115		MN0270100	17010592
3	Charge	1/7/2017	609.344.1(e) Criminal Sex Conduct-3rd Degree-16-17-Act >48 old-Position Authority	Felony	L5155		MN0270100	17010592
	Definition	1/7/2017	609.3455.6 Dangerous Sex Offenders - Ten Year Conditional Release	No-Level	L5155		MN0270100	17010592
	Penalty	1/7/2017	609.344.2(1) Criminal Sexual Conduct-3rd Degree-Penalty	Felony	L5155		MN0270100	17010592
	Definition	1/7/2017	609.3455.10 Dangerous Sex Offenders - Presumptive Executed Sentence for Repeat Sex Offenders	No-Level	L5155		MN0270100	17010592
	Definition	1/7/2017	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	L5155		MN0270100	17010592
	Definition	1/7/2017	609.3455.7 Dangerous Sex Offenders - Lifetime Conditional Release	No-Level	L5155		MN0270100	17010592
4	Charge	1/7/2017	609.345.1(f) Criminal Sex Cond-4th Degree-Victim	Felony	L7115		MN0270100	17010592

			16-17-Significant Relationship				
	Definition	1/7/2017	609.3455.10 Dangerous Sex Offenders - Presumptive Executed Sentence for Repeat Sex Offenders	No-Level	L7115	MN0270100	17010592
	Definition	1/7/2017	609.3455.6 Dangerous Sex Offenders - Ten Year Conditional Release	No-Level	L7115	MN0270100	17010592
	Penalty	1/7/2017	609.345.2 Criminal Sex Cond-4th Degree-Penalty	Felony	L7115	MN0270100	17010592
	Definition	1/7/2017	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	L7115	MN0270100	17010592
5	Charge	1/7/2017	609.345.1(f) Criminal Sex Cond-4th Degree-Victim 16-17-Significant Relationship	Felony	L7115	MN0270100	17010592
	Definition	1/7/2017	609.3455.10 Dangerous Sex Offenders - Presumptive Executed Sentence for Repeat Sex Offenders	No-Level	L7115	MN0270100	17010592
	Definition	1/7/2017	609.3455.6 Dangerous Sex Offenders - Ten Year Conditional Release	No-Level	L7115	MN0270100	17010592
	Penalty	1/7/2017	609.345.2 Criminal Sex Cond-4th Degree-Penalty	Felony	L7115	MN0270100	17010592
	Definition	1/7/2017	609.101.2 Minimum Fines – Victim Assistance Programs	No-Level	L7115	MN0270100	17010592
6	Charge	1/7/2017	609.713.1 Terroristic Threats-Reckless Disregard Risk	Felony	A9522	MN0270100	17010592
	Penalty	1/7/2017	609.713.1 Terroristic Threats-Reckless Disregard Risk	Felony	A9522	MN0270100	17010592
7	Charge	9/6/2017	609.749.5(a) Stalking - Pattern of Stalking Conduct	Felony	N131E	MN0270100	17010592
	Penalty	9/6/2017	609.749.5(a) Stalking - Pattern of Stalking Conduct	Felony	N131E	MN0270100	17010592

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