

State of Minnesota
County of Dakota

District Court
1st Judicial District

Prosecutor File No. CA-2016-01194
Court File No. 19HA-CR-16-3812

State of Minnesota,

Plaintiff,

vs.

JACOB ANDREW BERTRAND DOB: 01/01/1983

11333 Creciente Ct
San Diego, CA 92128

Defendant.

COMPLAINT

Summons

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 3rd Degree (Clergy) (During Religious Advice Meeting)

Minnesota Statute: 609.344.1(l)(i), with reference to: 609.344.2
Maximum Sentence: 0-15 Years and/or \$9,000.00 - \$30,000.00
Offense Level: Felony

Offense Date (on or about): 06/20/2010 to 07/30/2010

Control #(ICR#): 16000322

Charge Description: On or about June 20, 2010 - July 30, 2010, in the County of Dakota, Minnesota, JACOB ANDREW BERTRAND did engage in sexual penetration with another person, and the actor is or purports to be a member of the clergy, the complainant is not married to the actor, and the sexual penetration occurred during the course of a meeting in which the complainant sought or received religious or spiritual advice, aid, or comfort from the actor in private.

COUNT II

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

Offense Date (on or about): 06/20/2010 to 07/30/2010

Control #(ICR#): 16000322

Charge Description: On or about June 20, 2010 - July 30, 2010, in the County of Dakota, Minnesota, JACOB ANDREW BERTRAND did engage in sexual penetration with another person, and the actor is or purports 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.

STATEMENT OF PROBABLE CAUSE

On April 28, 2016, the Mendota Heights Police Department received a report from a 30-year-old female, hereinafter "victim." The victim contacted the police department to report sexual contact between the victim and Jacob Andrew Bertrand, DOB 1/1/1983, who was an ordained catholic priest at the time of this sexual contact. The victim reported the following facts:

In 2009, the victim moved to Rome, Italy, to study spirituality at a university. While studying at the university, she met Bertrand, who was also a student studying spirituality. Bertrand was also a deacon at a Catholic Church at that time. The victim reported that she and Bertrand were drawn to each other, but she believed it was in a spiritual way. The victim asked Bertrand to be her spiritual guide, and Bertrand agreed. The victim and Bertrand began to meet every Wednesday for "holy conversation."

In the fall of 2009, Bertrand told the victim that the Holy Spirit was compelling him to tell her about his sexual past. Bertrand then spoke with the victim about his previous sexual experiences and provided her with two of his journals. In exchange, the victim provided Bertrand with her journals, in which she wrote about her hopes of finding a husband while in Rome. After reading the victim's journals, Bertrand told the victim that he was the individual she was sent to Rome to meet, and the victim reported that she believed this. While at a church in Rome, Bertrand held the victim's hand and "mystically proposed" to her. Around this same time period, while Bertrand was praying in church, Bertrand told the victim that "the Lord" had imprinted a vision in his mind of the victim naked and straddling him.

In June of 2010, the victim and Bertrand flew to San Diego, California, where Bertrand was ordained as a catholic priest. While the victim and Bertrand were in San Diego together, they kissed on multiple occasions. In July of 2010, Bertrand flew to Minnesota and spent approximately a week staying at the home of the victim and her family in Mendota Heights, Dakota County, Minnesota. During that stay at the victim's home, Bertrand ministered to the victim's family, offered the "Sacrifice of the Mass" in their living room, and heard their confessions.

During his stay at the victim's residence, Bertrand accompanied the victim to her grandmother's home in Wisconsin. While at that cabin, Bertrand inserted [REDACTED] during a private mass in which he wore his priestly stole. During this sexual contact Bertrand ejaculated. Later that week, back at the victim's residence, the victim and Bertrand engaged in another private mass in the basement of her residence. During this private mass, Bertrand again wore his stole, and had candles burning. During this mass, the victim straddled Bertrand while he performed the Sacrifice of the Mass. During this ceremony Bertrand [REDACTED] on the victim, penetrating her [REDACTED]. Bertrand also ejaculated during this ceremony. After this ceremony Bertrand told the victim that

they had “fulfilled the second holiest sacrifice next to Jesus and Mary on Calvary.” Bertrand told the victim that what happened between them was so “mystical” no one else would understand it so they must not talk about it.

Later that summer Bertrand sent the victim a check for \$1,000.00, telling her that God told him to give the victim this money to use for her studies. The victim spoke with Bertrand by telephone in approximately December of 2011. In that conversation, Bertrand told the victim that “The devil tempts me to think that you will tell someone and ruin my ministry.”

In 2012 and in 2014, the victim reported the sexual contact with Bertrand to officials of the Catholic church. In 2014, the victim’s report was forwarded to officials in the San Diego Diocese for investigation. The victim provided an investigator with a November 30, 2014 Bulletin from the church where Bertrand was assigned. In this Bulletin, Bertrand told his parishioners that he had undergone a psychological evaluation and was taking a leave to seek treatment in a residential program. The victim reported that a few months later Bertrand was re-assigned to a new church in the San Diego Diocese and is currently serving as a priest at that church at this time.

The victim provided an investigator with a letter that Bertrand sent to the victim after she reported their sexual contact to the church in 2014. In this letter, Bertrand apologized to the victim for “the many injustices and scandals to your faith caused by the fault that lies on me.” In this letter Bertrand also told the victim that he had destroyed the journals they had shared, and had prayed for their “release from any demonic attachments that were leading me into such a folly and were keeping me from protecting you as a true priest should have.”

MINNESOTA
JUDICIAL
BRANCH

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

Chad Willson
Investigator
1101 Victoria Curve
Mendota Heights, MN 55118
Badge: 2238

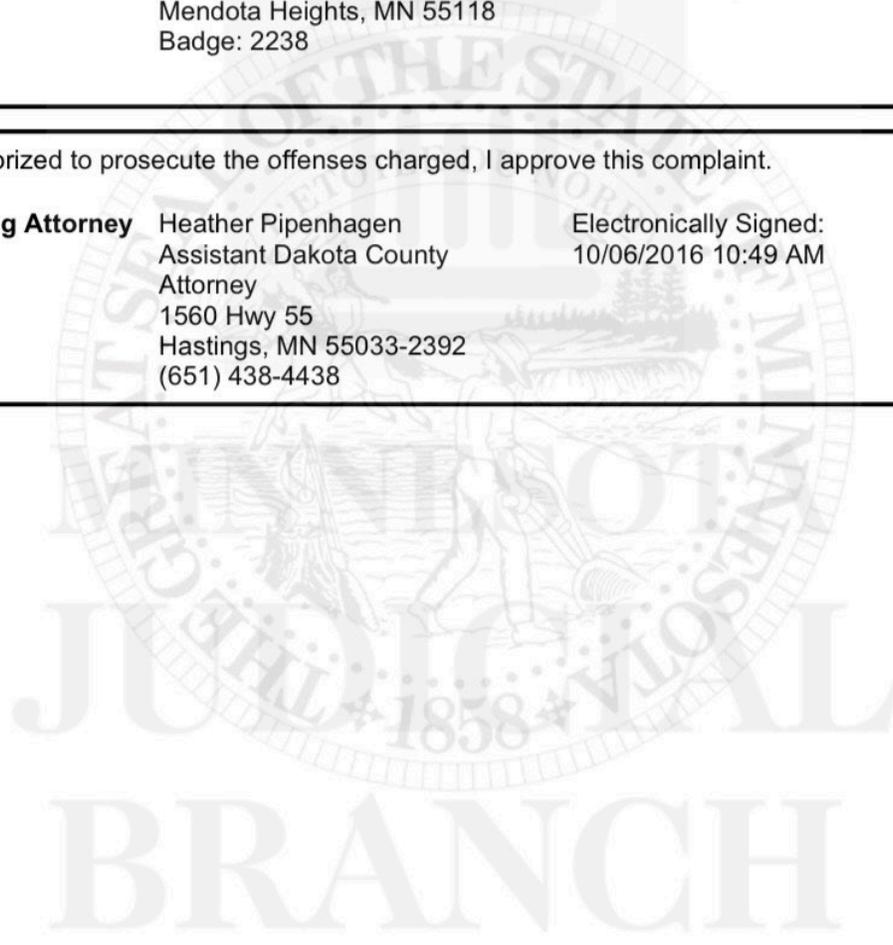
Electronically Signed:
10/06/2016 11:14 AM
Dakota County, Minnesota

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

Prosecuting Attorney

Heather Pipenhagen
Assistant Dakota County
Attorney
1560 Hwy 55
Hastings, MN 55033-2392
(651) 438-4438

Electronically Signed:
10/06/2016 10:49 AM



SIGNATURES AND APPROVALS

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Complainant	Chad Willson Investigator 1101 Victoria Curve Mendota Heights, MN 55118 Badge: 2238	Electronically Signed: 10/06/2016 11:14 AM Dakota County, Minnesota
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Being authorized to prosecute the offenses charged, I approve this complaint.

Prosecuting Attorney	Heather Pipenhagen Assistant Dakota County Attorney 1560 Hwy 55 Hastings, MN 55033-2392 (651) 438-4438	Electronically Signed: 10/06/2016 10:49 AM
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