

State of Minnesota  
County of Nicollet

District Court  
5th Judicial District

Prosecutor File No. 21CR00413  
Court File No. 52-CR-21-357

**State of Minnesota,**

Plaintiff,

vs.

**JEREMY ALAN GIEFER DOB: 12/16/1973**

322 W. Myrtle Street  
St. Peter, MN 56082

Defendant.

**COMPLAINT**

Warrant

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-2nd Degree-Victim 13-15-Position Authority**

Minnesota Statute: 609.343.1(b), with reference to: 609.343.2(a), 609.343.2(b), 609.343.2(c)

Maximum Sentence: 25 years and/or \$35,000 fine

Offense Level: Felony

Offense Date (on or about): 08/30/2021 to 08/31/2021

Control #(ICR#): 21005041

Charge Description: Then and there being, the above-named Defendant, namely Jeremy Alan Giefer, did wrongfully and unlawfully engage in sexual contact with Victim who is at least 13 but less than 16 years of age and Defendant is more than 48 months older than Victim and in a current or recent position of authority over the complainant, contrary to statutes in such case made and provided.

**COUNT II**

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

Minnesota Statute: 609.345.1(b), with reference to: 609.345.2

Maximum Sentence: 10 years and/or \$20,000 fine

Offense Level: Felony

Offense Date (on or about): 08/30/2021 to 08/31/2021

Control #(ICR#): 21005041

Charge Description: Then and there being, the above-named Defendant, namely Jeremy Alan Giefer, did wrongfully and unlawfully engage in sexual contact with Victim who is at least 13 but less than 16 years of age and Defendant is more than 48 months older than Victim, contrary to statutes in such case made and provided.

**COUNT III**

**Charge: Criminal Sex Conduct-4th Degree-Force or Coercion**

Minnesota Statute: 609.345.1(c), with reference to: 609.345.2

Maximum Sentence: 10 years and/or \$20,000 fine

Offense Level: Felony

Offense Date (on or about): 08/30/2021 to 08/31/2021

Control #(ICR#): 21005041

Charge Description: Then and there being, the above-named Defendant, namely Jeremy Alan Giefer, did wrongfully and unlawfully engage in sexual contact with another person, to-wit: Victim, using force or coercion to accomplish the contact, contrary to statutes in such case made and provided.

**COUNT IV****Charge: Criminal Sex Conduct-5th Degree-NonConsensual Sex Contact**

Minnesota Statute: 609.3451.1(1), with reference to: 609.3451.2

Maximum Sentence: 1 year, \$3,000 fine or both

Offense Level: Gross Misdemeanor

Offense Date (on or about): 08/30/2021 to 08/31/2021

Control #(ICR#): 21005041

Charge Description: Then and there being, the above-named Defendant, namely Jeremy Alan Giefer, did wrongfully, unlawfully, and willfully engage in nonconsensual sexual contact with another, contrary to statutes in such case made and provided.

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**STATEMENT OF PROBABLE CAUSE**

Your Complainant, of the St. Peter Police Department, has reviewed the reports in this matter and states upon further information, investigation, and belief as follows:

On September 1, 2021, law enforcement received a report that JEREMY ALAN GIEFER (hereinafter "DEFENDANT"), DOB: 12/16/1973, had sent inappropriate text messages to and had inappropriate conduct with Victim while Victim and Witness 1 spent the night at DEFENDANT's residence located in the City of St. Peter, County of Nicollet, State of Minnesota, from August 30, 2021 to August 31, 2021.

Both Victim and Witness 1 are thirteen years old. Witness 1 is a family or household member of DEFENDANT as defined by Minnesota Statutes. Victim and Witness 1 gave statements to law enforcement on September 1, 2021 as well as follow-up statements at the Child and Family Advocate Center on September 3, 2021.

Victim's statements indicated she had received text messages directly from DEFENDANT inviting her to come and see his new house, asking what she was doing, and asking why she had not come to see his house yet. Victim stated she eventually did go over to his house on August 30, 2021. Victim said DEFENDANT offered to pick her up and drive her to his residence himself, but she did not want to ride along with DEFENDANT so she arranged a ride herself.

A little while after she arrived, Victim was sitting on Witness 1's bed on the second floor of DEFENDANT's house. Victim stated the door was partially open and Witness 1 was on the main floor at the time. Victim stated DEFENDANT came into the bedroom, closed the door, and approached Victim. Victim reported DEFENDANT then pushed her over onto her back on the bed. Victim stated DEFENDANT's hand touched one of her breasts while he pushed her back. Victim said DEFENDANT then grabbed her thigh, rolled her lower body over, and slapped her butt twice. Victim reported that, while she was on her back, DEFENDANT straddled her while kneeling on the bed and sat on her stomach. Victim stated that throughout the encounter, she screamed Witness 1's name, "Stop," and "Help." Victim said she fought DEFENDANT throughout the encounter, and DEFENDANT was laughing throughout the encounter.

Witness 1's statements indicated that, around July 16, 2021, DEFENDANT began asking her more frequently about Victim and began texting Victim directly without Witness 1's knowledge. Witness 1 stated the messages included invitations for Victim to come and see DEFENDANT's new house. Witness 1 stated that on August 30, 2021 she was at DEFENDANT's house and there were plans for Victim come over and stay the night. Witness 1 stated that Victim received a ride to DEFENDANT's house. Witness stated that soon after Victim arrived, Witness 1 was in the kitchen on the main floor while Victim was in Witness 1's bedroom on the second floor. Witness 1 stated she heard Victim scream Witness 1's name and "Stop." Witness 1 stated she ran to the bedroom, threw the door open, and saw DEFENDANT on top of Victim. Witness 1 believed DEFENDANT may have been holding Victim's arms down. Witness 1 said that after she opened the door, DEFENDANT jumped off Victim and exited the room.

Later that night, DEFENDANT began texting Victim while Victim and Witness 1 were in Witness 1's room. Witness 1 and Victim locked and barricaded the door at the time. These messages included the following conversations:

\* After DEFENDANT texted "Go to bed" and "I can still here u lol," Victim by stating that Witness 1 "says to close your eyes," and DEFENDANT replied with "Come make me."

\* DEFENDANT sent an image with the caption "SO... BORED," Victim responded by messaging "Go to bed then lol," and DEFENDANT replied with "Not yet lol." After Victim asked why DEFENDANT was not

going to bed if he was bored, DEFENDANT replied with a “Shushing emoji” image and an emoji image with a zipper over its mouth.

\* DEFENDANT later texted “Visit.” After Victim questioned the message and said she did not understand, DEFENDANT sent the message “Bathroom.” When Victim asked why, DEFENDANT again sent a “Shushing emoji” image and an emoji image with a zipper over its mouth. When Victim again asked why, DEFENDANT sent the message “All talk lol.”

\* Victim eventually sent messages saying she was going to bed and DEFENDANT replied with “Come out.” When Victim asked why, DEFENDANT messaged “Door lock” and “I need help with my back.”

\* DEFENDANT later messaged “Step up” and, when Victim again questioned why, DEFENDANT sent a message “U see.”

\* DEFENDANT also messaged an emoji image of a lock, and when Victim asked why he wanted to get into the room, DEFENDANT replied with “U said.”

While DEFENDANT was texting Victim, Victim and Witness 1 noticed the bedroom door handle jiggle. Victim and Witness 1 believed DEFENDANT was attempting to get into the room. Witness 1 and Victim left the room once to use the bathroom that night. Victim said she took pepper spray with her while they did so.

Victim and Witness 1 also indicated that during a trip to Wisconsin in early August with DEFENDANT and others, DEFENDANT repeatedly walked into the bathroom while Victim and Witness 1 were changing, using the bathroom, and showering. Victim and Witness 1 estimated this occurred approximately six times to the point that Victim and Witness 1 alternated changing clothes while the other waited at the door to keep DEFENDANT from entering. Victim and Witness 1 also changed their clothes inside a closet area instead of in the bathroom.

Law enforcement met with DEFENDANT on September 7, 2021. When asked if he talked with Victim, DEFENDANT initially responded, “Not really,” but later added that he invited her over. He also stated that he texted Victim and Witness 1 to go to bed when they were over because they were arguing in the bedroom and he had to wake up early for work. DEFENDANT provided his phone to law enforcement, and law enforcement learned that he deleted the text conversation with Victim from August 30 and had also deleted Victim as a contact from the phone as well. Law enforcement noted that DEFENDANT’s denials were inconsistent with the content of DEFENDANT’S text messages to Witness 1 and Victim, including that DEFENDANT stated he only texted Witness 1 and Victim to go to bed. However, the text messages show the Victim told DEFENDANT to go to bed and DEFENDANT replied, “Not yet.”

The State is requesting that this complaint issue as a warrant.

**PLEASE TAKE NOTICE: YOU MUST APPEAR FOR EVERY COURT HEARING REGARDING THIS CASE. FAILURE TO APPEAR FOR COURT IS A CRIMINAL OFFENSE AND MAY RESULT IN ADDITIONAL CRIMINAL CHARGES BEING IMPOSED AND PUNISHED AS PROVIDED IN MINNESOTA STATUTE SECTION 609.49.**

**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**

David Krzmarzick  
Patrol Officer  
207 S Front Street  
St Peter, MN 56082-2592  
Badge: 1918

Electronically Signed:  
09/17/2021 03:11 PM  
Nicollet County, MN

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

**Prosecuting Attorney**

Daniel Robert Green  
501 S Minnesota Ave  
St Peter, MN 56082  
(507) 934-7890

Electronically Signed:  
09/17/2021 02:56 PM

**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: September 20, 2021.

**Judicial Officer**

Todd W. Westphal  
Judge of District Court

Electronically Signed: 09/20/2021 03:49 PM

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

**COUNTY OF NICOLLET  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**Jeremy Alan Giefer**

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:** Jeremy Alan Giefer  
**DOB:** 12/16/1973  
**Address:** 322 W. Myrtle Street  
St. Peter, MN 56082

**Alias Names/DOB:**

**SID:**

**Height:**

**Weight:**

**Eye Color:**

**Hair Color:**

**Gender:**

MALE

**Race:**

**Fingerprints Required per Statute:**

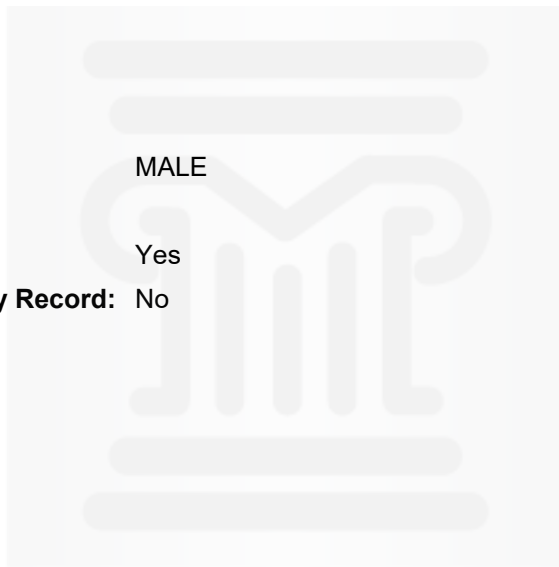
Yes

**Fingerprint match to Criminal History Record:**

No

**Driver's License #:**

**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	8/30/2021	609.343.1(b) Criminal Sex Conduct-2nd Degree-Victim 13-15-Position Authority	Felony	L3003	N	MN0520200	21005041
	Definition	8/30/2021	609.343.2(c) Criminal Sexual Conduct-2nd Degree-Subject to conditional release under 609.3455	No-Level	L3003	N	MN0520200	21005041
	Penalty	8/30/2021	609.343.2(b) Criminal Sexual Conduct-2nd Degree-Penalty-90 Mos. Presumptive Sentence	Felony	L3003	N	MN0520200	21005041
	Penalty	8/30/2021	609.343.2(a) Criminal Sexual Conduct-2nd Degree-Penalty-Stat. Max.	Felony	L3003	N	MN0520200	21005041
2	Charge	8/30/2021	609.345.1(b) Criminal Sex Cond-4th Degree-Victim 13-15-Act >48m Old	Felony	L7A03	N	MN0520200	21005041
	Penalty	8/30/2021	609.345.2 Criminal Sex Cond-4th Degree-Penalty	Felony	L7A03	N	MN0520200	21005041
3	Charge	8/30/2021	609.345.1(c) Criminal Sex Conduct-4th Degree-Force or Coercion	Felony	L7300	N	MN0520200	21005041
	Penalty	8/30/2021	609.345.2 Criminal Sex Cond-4th Degree-Penalty	Felony	L7300	N	MN0520200	21005041
4	Charge	8/30/2021	609.3451.1(1) Criminal Sex Conduct-5th Degree-NonConsensual Sex Contact	Gross Misdemeanor	LA000	N	MN0520200	21005041
	Penalty	8/30/2021	609.3451.2 Criminal Sex Cond-5th Deg-Nonconsensual Sexual Contact/Lewd Exhibition-Under 16 Present - Penalty	Gross Misdemeanor	LA000	N	MN0520200	21005041

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