

State of Minnesota  
County of Olmsted

District Court  
3rd Judicial District

Prosecutor File No. 0550020898  
Court File No. 55-CR-20-7121

**State of Minnesota,**

Plaintiff,

vs.

**BRADLEY JOHN DORSHER DOB: 01/16/1983**

16840 Sunset Tr NW  
Branson, MN 56315

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

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

Maximum Sentence: 25 years or \$35,000 fine or both (MSG SL D)

Offense Level: Felony

Offense Date (on or about): 01/07/2018 to 08/07/2018

Control #(ICR#): 20025385

Charge Description: On or about January 1, 2018 through August 7, 2018, in the County of Olmsted, Minnesota, Bradley John Dorsher did wrongfully, unlawfully and feloniously engage in sexual contact with another person, to-wit: Victim, who was at least 13 but less than 16 years of age, and Bradley John Dorsher is more than 48 months older than Victim and in a position of authority over Victim.

**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 or \$20,000 or both (MSG SL F)

Offense Level: Felony

Offense Date (on or about): 01/01/2018 to 08/07/2018

Control #(ICR#): 20025385

Charge Description: On or about January 1, 2018 through August 7, 2018, in the County of Olmsted, Minnesota, Bradley John Dorsher did wrongfully and unlawfully engage in sexual contact with another person, to-wit: Victim, and Victim was at least 13 but less than 16 years of age and Bradley John Dorsher is more than 48 months older than Victim or is in a current or recent position of authority over Victim.

**STATEMENT OF PROBABLE CAUSE**

The Complainant states that the following facts establish probable cause:

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Your complainant is a licensed peace officer employed by the Rochester Police Department. In that capacity your Complainant has reviewed the police reports relating to Bradley John Dorsher, the above-named defendant, and the allegations contained therein. Based upon that information, your complainant believes the following to be true and correct.

On June 12, 2020, at 4:57 PM, Officer Hulshizer of the Rochester Police Department was dispatched to a sexual assault complaint that had occurred in 2018 at an athletic club in Rochester, Olmsted County, Minnesota. Officer Hulshizer spoke with Witness 1. Witness 1 reported that her daughter, Victim- a juvenile female fully identified in police reports, disclosed to her that Victim had been touched sexually by her boss, Bradley John Dorsher (1/16/1983), Defendant herein. Victim disclosed that starting in May of 2017, while Victim was 14 years old, Defendant had began making sexual comments to Victim. The sexual comments continued and in the spring of 2018, when Victim was 15 years old, Defendant began touching Victim. Victim had never disclosed to Witness 1, but Victim had been working with a therapist and had disclosed to her.

The case was referred to Inv. Caban for further investigation. On June 15, 2020, Inv. Caban conducted an interview with Victim. Victim told Inv. Caban that she first met Defendant when she was taking tennis lessons at the athletic club. In January or February of 2017, Victim started to work with Defendant teaching lessons. Initially, Defendant would make comments to Victim about the appearance of other women. In the summer of 2017, Defendant began making direct comments to Victim about Victim's appearance. In January or February of 2018, Victim confided in Defendant about a relationship fallout she had with a high school friend because she thought Defendant was supportive. Defendant then began to talk about his sex life and tell Victim how he would like to have sex. At one point, Victim told Defendant that she started taking belly dancing classes and Defendant said, "that really turns me on." In the spring of 2018, Defendant began touching Victim. At first Defendant pretended to accidentally brush against Victim and would touch her buttocks and breasts with his hand. Defendant would come up to her and give her unwanted hugs while pressing his body on her body. Defendant would put his arm around Victim at times and would put his hands on Victim's breast.

On one occasion, Victim went to an office Defendant was working in. Defendant stayed seated but rolled over to Victim who was standing. Defendant gave Victim a hug while facing her and pressed his head on Victim's breasts. Defendant would routinely tell Victim that he "should not have done that" or "that crossed the line." The last incident that Victim could remember with Defendant took place at the end of July in 2018. Defendant cornered Victim in an office and gave Victim a hug from behind. Victim pushed Defendant away and he grabbed Victim's buttocks as he moved away. Victim estimated that Defendant touched her breasts approximately five times during the summer in 2018. Victim originally told her mom about the verbal sexual harassment but not about the physical assaults.

On June 16, 2020, Inv. Caban spoke with Defendant by phone. Defendant told Inv. Caban that he was Victim's tennis coach and they had a professional relationship. Defendant said he resigned from the athletic club for personal reasons. A few minutes after speaking with Inv. Caban, Defendant called again to correct his statement. Defendant stated that Victim made a complaint against him for comments he had made. After the complaint Defendant resigned.

On June 17, 2020, Inv. Caban spoke with Witness- the human resources director at the athletic club. Witness indicated that he was made aware of verbal harassment from Defendant to Victim which were reported on August 7, 2020. Defendant admitted that he made comments about Victim's butt and a bra she wore.

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 STATUTES 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**

Anne M. Johnson  
Investigator  
101 4th Street SE  
Rochester, MN 55904-3761  
Badge: 2302

Electronically Signed:  
12/09/2020 11:22 AM  
Olmsted County, Minnesota

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

**Prosecuting Attorney**

Joseph K Rosholt  
151 4th Street SE  
Government Center - 3rd Floor  
Rochester, MN 55904  
(507) 328-7600

Electronically Signed:  
12/09/2020 09:45 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 **January 13, 2021 at 9:00 AM** before the above-named court at 151 Fourth Street SE, Rochester, MN 55904 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: December 12, 2020.

**Judicial Officer**

Lisa R Hayne

Electronically Signed: 12/12/2020 10:44 PM

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

**COUNTY OF OLMSTED  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**Bradley John Dorsher**

Defendant

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

Signature of Authorized Service Agent:

**DEFENDANT FACT SHEET**

**Name:** Bradley John Dorsher  
**DOB:** 01/16/1983  
**Address:** 16840 Sunset Tr NW  
Branson, MN 56315

**Alias Names/DOB:**

**SID:**

**Height:**

**Weight:** 0lbs.

**Eye Color:**

**Hair Color:**

**Gender:**

**Race:**

**Fingerprints Required per Statute:** Yes

**Fingerprint match to Criminal History Record:** No

**Driver's License #:**

**Alcohol Concentration:**

**STATUTE AND OFFENSE GRID**

<b>Cnt Nbr</b>	<b>Statute Type</b>	<b>Offense Date(s)</b>	<b>Statute Nbrs and Descriptions</b>	<b>Offense Level</b>	<b>MOC</b>	<b>GOC</b>	<b>Controlling Agencies</b>	<b>Case Numbers</b>
1	Charge	1/7/2018	609.343.1(b) Criminal Sex Conduct-2nd Degree-Victim 13-15-Position Authority	Felony	L3855		MN0550100	20025385
	Penalty	1/7/2018	609.343.2(a) Criminal Sexual Conduct-2nd Degree-Penalty-Stat. Max.	Felony	L3855		MN0550100	20025385
2	Charge	1/1/2018	609.345.1(b) Criminal Sex Cond-4th Degree-Victim 13-15-Act >48m Old	Felony	L7053		MN0550100	20025385
	Penalty	1/1/2018	609.345.2 Criminal Sex Cond-4th Degree-Penalty	Felony	L7053		MN0550100	20025385