

State of Minnesota  
County of Carlton

District Court  
6th Judicial District

Prosecutor File No. 0090029823  
Court File No. 09-CR-21-708

**State of Minnesota,**  
Plaintiff,

**COMPLAINT**  
Warrant

vs.

**MICHELLE DAWN BROWNFIELD DOB: 06/15/1982**

606 Spears Ave  
Duluth, MN 55803

Defendant.

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-Correctional/Secure Treatment or other Treatment Employee**

Minnesota Statute: 609.344.1(m)  
Maximum Sentence: 15 Years or \$30,000 fine or both.  
Offense Level: Felony

Offense Date (on or about): 01/01/2016 to 06/20/2017

Control #(ICR#): 20000247

Charge Description: On or about between January 1, 2016 and June 20, 2017, in the County of Carlton, Minnesota, Michelle Dawn Brownfield did engage in sexual penetration with another person while an employee of a secure treatment facility providing services to clients civilly committed as sexually dangerous persons or sexual psychopathic personalities and the complainant D.B. was a resident of the secure treatment facility.

**COUNT II**

**Charge: Criminal Sex Conduct-3rd Degree-Correctional/Secure Treatment or other Treatment Employee**

Minnesota Statute: 609.344.1(m)  
Maximum Sentence: 15 Years or \$30,000 fine or both.  
Offense Level: Felony

Offense Date (on or about): 02/01/2018 to 02/28/2018

Control #(ICR#): 20000247

Charge Description: On or about between February 1, 2018 and February 28, 2018 in the County of Carlton, Minnesota, Michelle Dawn Brownfield did engage in sexual penetration with another person while an employee of a secure treatment facility providing services to clients civilly committed as sexually

dangerous persons or sexual psychopathic personalities and the complainant E.P. was a resident of the secure treatment facility.

**STATEMENT OF PROBABLE CAUSE**

The Complainant states that the following facts establish probable cause:

---

In October of 2020, the Moose Lake Police Department began an investigation after receiving a report from the Minnesota Sex Offender Program (MSOP) in Moose Lake, within Carlton County, Minnesota. The report involved an allegation that a staff member, Michelle Dawn Brownfield, d.o.b. 6/15/1982 (hereinafter Defendant) had a sexual relationship with a client at the facility. MSOP is a secure treatment facility serving clients committed as sexually dangerous persons and sexually psychopathic personalities.

Defendant is a Minnesota licensed psychologist. Prior to obtaining full licensure, Defendant worked under another Psychologist's license at the facility and performed the same duties. Defendant's duties at MSOP included performing psychological assessments and evaluations of clients at the facility.

In September of 2020, D.B. a client at the facility reported that he had been engaged in a long relationship with Defendant. D.B. was referred to Defendant for assessments in 2016. Over time, a relationship developed which included sexual contact and sexual penetration in the assessment office. In 2017, D.B. was transferred to the Department of Correction (DOC) and was out of the facility until 2019. While at the DOC, D.B. communicated with Defendant using his sister as a go between. During that period, Defendant and D.B.'s sister developed a friendly relationship where they were in regular communication. Upon return to the facility, D.B. and Defendant would talk but sexual activity did not resume.

Officers also learned that, E.P., a client at the facility reported to his primary therapist that he had been engaged in a sexual relationship with Defendant beginning in approximately the fall of 2017. E.P. disclosed that he was aware of Defendant's relationship with D.B. and that Defendant approached him and they discussed that relationship then began discussing sex. E.P. and Defendant met in an assessment room on multiple occasions and would engage in sexual discussions and masturbate. In February of 2018, Defendant met E.P. in a polygraph room and solicited sexual intercourse. E.P. and Defendant engaged in sexual penetration including intercourse and fellatio. E.P. stated that was the only occasion they physically engaged in sexual activity. In the course of Defendant's relationship with E.P., they would use E.P.'s girlfriend outside the facility as a go between. Officers collected text communication between E.P.'s girlfriend and Defendant and D.B.'s sister and Defendant.

In the collected text communication between Defendant and D.B.'s sister, spanning from October of 2018 until August of 2020, Defendant makes multiple statements about strong romantic feelings for D.B. She also states that she loves him and that her relationship with D.B., "is a true Romeo and Juliet scenario." She discusses the emotional toll when D.B. went to DOC and the stress of leading a double life and putting her career in jeopardy. In the text conversations, Defendant references a relationship with another person that began around winter time, the end of 2017 and ended before June of 2018. Defendant also references a ring and necklace that correspond to a pet name in the relationship.

In Defendant's text communication with E.P.'s girlfriend, Defendant references D.B. and E.P. by initials and discusses an ongoing investigation. After being contacted by Moose Lake Police Department, Defendant continued to engage in text communication discussing the ongoing investigation and excuses she made to law enforcement to avoid a meeting.

Officers collected Defendant's phone, which was analyzed by the Minnesota BCA. The phone contained a great deal of sexually explicit material including sexually explicit photos of Defendant. Data on the phone corroborated a statement by D.B. that Defendant has a piercing on an intimate part. The phone also

contained text communication matching what officers were previously provided, a booking photo of D421/2021 and written entries describing sexual arousal during assessment of sexual offenders.

**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**

Raymond Couture  
Officer  
600 Highway 73  
#2  
Moose Lake, MN 55767  
Badge: 3869

Electronically Signed:  
04/21/2021 10:43 AM  
Carlton County, Minnesota

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

**Prosecuting Attorney**

Jeffrey Boucher  
301 Walnut Street  
P.O. Box 300  
Carlton, MN 55718  
(218) 384-9166

Electronically Signed:  
04/21/2021 10:25 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 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: April 21, 2021.

**Judicial Officer**                      Robert Macaulay  
District Court Judge

Electronically Signed: 04/21/2021 11:03 AM

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

**COUNTY OF CARLTON  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**Michelle Dawn Brownfield**

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:** Michelle Dawn Brownfield  
**DOB:** 06/15/1982  
**Address:** 606 Spears Ave  
Duluth, MN 55803

**Alias Names/DOB:**

**SID:**

**Height:**

**Weight:** 160lbs.

**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	1/1/2016	609.344.1(m) Criminal Sex Conduct-3rd Degree-Correctional/Secure Treatment or other Treatment Employee	Felony	L51E8		MN0090200	20000247
2	Charge	2/1/2018	609.344.1(m) Criminal Sex Conduct-3rd Degree-Correctional/Secure Treatment or other Treatment Employee	Felony	L51E8		MN0090200	20000247