

State of Minnesota
County of Olmsted

District Court
3rd Judicial District

Prosecutor File No. 0550065342
Court File No. 55-CR-21-1290

State of Minnesota,
Plaintiff,
vs.

COMPLAINT
Summons
 Amended

QUENTIN TERRELL TOWNSELL DOB: 04/21/1988
2709 2nd St SW
Rochester, MN 55902
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 Sexual Conduct-1st Degree-Penetration or Contact with Person Under 13
Minnesota Statute: 609.342.1, with reference to: 609.342.2(a)
Maximum Sentence: 30 years or \$40,000 fine or both
Offense Level: Felony

Offense Date (on or about): 03/03/2021

Control #(ICR#): 21009113

Charge Description: On or about March 3, 2021, in the County of Olmsted, Minnesota, Quentin Terrell Townsell did wrongfully, unlawfully and feloniously engage in sexual penetration with another person, to-wit: Victim, or in sexual contact with a person under 13 years of age as defined in section 609.341, subdivision 11, paragraph (c) and the Victim is under 13 years of age and Quentin Terrell Townsell is more than 36 months older than Victim.

COUNT II

Charge: Criminal Sexual Conduct-1st Degree-Penetration or Contact with Person Under 13
Minnesota Statute: 609.342.1, with reference to: 609.342.2(a)
Maximum Sentence: 30 years or \$40,000 fine or both
Offense Level: Felony

Offense Date (on or about): 03/03/2021

Control #(ICR#): 21009113

Charge Description: On or about March 3, 2021, in the County of Olmsted, Minnesota, Quentin Terrell Townsell did wrongfully, unlawfully and feloniously engage in sexual penetration with another person, to-wit: Victim, or in sexual contact with a person under 13 years of age as defined in section 609.341, subdivision 11, paragraph (c) and the Victim is under 13 years of age and Quentin Terrell Townsell is more than 36 months older than Victim.

COUNT III

Charge: Criminal Sexual Conduct-1st Degree-Penetration or Contact with Person Under 13

Minnesota Statute: 609.342.1, with reference to: 609.342.2(a)

Maximum Sentence: 30 years or \$40,000 fine or both

Offense Level: Felony

Offense Date (on or about): 03/03/2021

Control #(ICR#): 21009113

Charge Description: On or about March 3, 2021, in the County of Olmsted, Minnesota, Quentin Terrell Townsell did wrongfully, unlawfully and feloniously engage in sexual penetration with another person, to-wit: Victim, or in sexual contact with a person under 13 years of age as defined in section 609.341, subdivision 11, paragraph (c) and the Victim is under 13 years of age and Quentin Terrell Townsell is more than 36 months older than Victim.

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

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 QUENTIN TERRELL TOWNSELL (DOB 4/21/88) the above-named defendant, and the allegations contained therein. Based upon that information, your complainant believes the following to be true and correct.

On Friday, March 5, 2021, officers from the Rochester Police Department were dispatched to a residence in northeast Rochester, Olmsted County, State of Minnesota, for a reported sexual assault of a child or children. Upon arrival, Ofc. Tan spoke with adult female (hereinafter "Victims' mother"). Victims' mother reported that two of her three children had just reported sexual abuse by her domestic partner, QUENTIN TERRELL TOWNSELL (DOB 4/21/88). Victims' mother reported her three children were all under age 13 and the older two children had disclosed conduct that sounded like sexual penetration. Officers transported Victims' mother and her children to St. Mary's Emergency Department.

VICTIM 1

At the hospital, it was decided that an interview would be conducted with the second-oldest child (hereinafter "Victim 1"). Victim 1, who is 10 years old, was interviewed by Inv. C. Jacobsen. Victim 1 disclosed that Townsell has been touching her privates for about two years. Specifically, Victim 1 described the most recent incident that occurred approximately two nights before when Victim 1 was lying in her bed. Townsell came into her bedroom and closed the door. Townsell then came over to Victim 1's bed and took off Victim 1's pants. Townsell then pulled his pants down to his ankles and lay down beside Victim 1. According to Victim 1, Townsell used a sexual lubricant and engaged in sexual penetration with Victim 1. Victim 1 stated that she felt significant pain. When Townsell L was done, he got up and left twenty dollars for Victim 1. Victim 1 described the conduct occurring at the residence in northeast Rochester.

Investigators and other professionals decided to conduct structured forensic interviews with the other two children at the Mayo Clinic Child and Family Advocacy Program later during the week of March 8, 2021.

VICTIM 2

On March 10th, Inv. Jacobsen of the Rochester Police Department sat in on the forensic interview of the oldest girl, Victim 2, who is 11 years old. In sum, Victim 2 disclosed that Townsell had, in recent weeks, engaged in acts of sexual penetration with her. Specifically, she stated that Townsell would use his mouth to lick her breasts, followed by attempting to put his penis in her mouth. Victim 2 stated that she "would not let" Townsell insert his penis into her mouth. She said that Townsell would lubricate his penis with "KY" brand petroleum jelly and then penetrate her "butt," with his penis. She stated that Townsell would then "move up and down" when he was "inside" her butt, and she would close her eyes and cry as he did so.

In addition to the sexual assault, Victim 2 also reported that Townsell had non-sexually assaulted her by choking her with his hand, which caused her to have difficulty breathing. Townsell also slammed her head into a doorknob, which she said it "hurt a lot."

VICTIM 3

Victim 3 was interviewed by Inv. Sherry Bush-Seim at the Child Advocacy Center in Rochester on March 9th, 2021. Victim 3 is the youngest of the three sisters and is 8 years of age.

Victim 3 reported that Townsell would force her to "suck on his pee pee." She also stated that Townsell

would use “gel stuff” that he would put on his “wee wee” before he would “stick in in her butt.” Inv. Bush-Seim had Victim 3 identify the “wee wee,” “private” and “butt” on diagrams of male and female anatomy, respectively. Victim 3 identify the “wee wee” as the penis, the “private” as the vagina and the “butt” as the anus.

Victim 3 disclosed that Townsell would place a condom on his penis and force it into her mouth when it was “soft.” She reported that Townsell would grab her by the head and attempt to force his penis further into her mouth, which would make her gag and in one instance, caused her to vomit.

Victim 3 further disclosed that, on some mornings before school, Townsell would lubricate his penis and force into her vagina. She reported that it was “slippery and it hurt,” and that sometimes “white stuff” would come out of Townsell’s penis. When asked how many times the vaginal assaults had occurred, Victim 3 stated “I did not count how many times, but it has been a long time.” Victim 3 stated Townsell would penetrate her vagina with his penis “three times a week.”

ARREST

On Sunday, March 7, 2021, Victims' mother advised officers that Townsell was in her residence hiding from the police. Due to Townsell being a continuing threat to the safety of Victims' mother and the children, officers decided to arrest Townsell at Victims' mother's residence. Townsell did not respond to numerous announcements/requests for him to come outside. Officers tried to use a garage security code, but it was apparent that TOWNSELL had removed batteries from the utility door lock. Officers made entry to the residence and arrested Townsell.

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

Andrea Burdick
Officer
101 4th Street SE
Rochester, MN 55904-3761
Badge: 2309

Electronically Signed:
03/15/2021 09:34 AM
Olmsted County, Minnesota

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

Prosecuting Attorney

Brian Warner Hagen
Senior County Attorney
151 4th Street SE
Government Center - 3rd Floor
Rochester, MN 55904
(507) 328-7600

Electronically Signed:
03/15/2021 09:33 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: March 16, 2021.

Judicial Officer

Jacob C Allen
Judge

Electronically Signed: 03/16/2021 08:25 AM

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

**COUNTY OF OLMSTED
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Quentin Terrell Townsell

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: Quentin Terrell Townsell
DOB: 04/21/1988
Address: 2709 2nd St SW
Rochester, MN 55902

Alias Names/DOB:

SID: MN07091435

Height:

Weight: 245lbs.

Eye Color:

Hair Color:

Gender:

Race:

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: Yes

Driver's License #: W793277255119 (MN)

Case Scheduling Information: Added Counts 2 and 3 (MOC for both: L1B41).

Alcohol Concentration:

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	3/3/2021	609.342.1 Criminal Sexual Conduct-1st Degree-Penetration or Contact with Person Under 13	Felony	L1B41		MN0550100	21009113
	Penalty	3/3/2021	609.342.2(a) Criminal Sexual Conduct-1st Degree-Penalty-Stat Max	Felony	L1B41		MN0550100	21009113
2	Charge	3/3/2021	609.342.1 Criminal Sexual Conduct-1st Degree-Penetration or Contact with Person Under 13	Felony	L1B41		MN0550100	21009113
	Penalty	3/3/2021	609.342.2(a) Criminal Sexual Conduct-1st Degree-Penalty-Stat Max	Felony	L1B41		MN0550100	21009113
3	Charge	3/3/2021	609.342.1 Criminal Sexual Conduct-1st Degree-Penetration or Contact with Person Under 13	Felony	L1B41		MN0550100	21009113
	Penalty	3/3/2021	609.342.2(a) Criminal Sexual Conduct-1st Degree-Penalty-Stat Max	Felony	L1B41		MN0550100	21009113