
State of Minnesota,

Plaintiff,

vs.

MICHAEL BRUCE CAMERON DOB: 07/16/1962

1002 MARIAN ST
ST PAUL, MN 55110

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-3rd Degree-Victim Mental Impair/Helpless

Minnesota Statute: 609.344.1(d), with reference to: 609.101.2, 609.3455.6, 609.344.2(1)

Maximum Sentence: 15 YEARS AND/OR \$10,000-\$30,000 PLUS CONDITIONAL RELEASE

Offense Level: Felony

Offense Date (on or about): 02/13/2015

Control #(ICR#): 15009582

Charge Description: That on or about February 13-14, 2015, in Plymouth, Hennepin County, Minnesota, MICHAEL BRUCE CAMERON born 7/16/1962, engaged in sexual penetration with an adult female, knowing or having reason to know that the victim was mentally impaired, mentally incapacitated or physically helpless.

COUNT II

Charge: Criminal Sex Cond-4th Degree-Victim Mental Impair/Helpless

Minnesota Statute: 609.345.1(d), with reference to: 609.345.2, 609.101.2, 609.3455.6

Maximum Sentence: 10 YEARS AND/OR \$6,000-\$20,000 PLUS CONDITIONAL RELEASE

Offense Level: Felony

Offense Date (on or about): 02/13/2015

Control #(ICR#): 15009582

Charge Description: That on or about February 13-14, 2015, in Plymouth, Hennepin County, Minnesota, MICHAEL BRUCE CAMERON, born 7/16/1962, engaged in sexual contact with the an adult female knowing or having reason to know that the victim was mentally impaired, mentally incapacitated or physically helpless.

COUNT III

Charge: Criminal Sex Cond-4th Degree-Victim Mental Impair/Helpless

Minnesota Statute: 609.345.1(d), with reference to: 609.345.2, 609.101.2, 609.3455.6

Maximum Sentence: 10 YEARS AND/OR \$6,000-\$20,000 PLUS CONDITIONAL RELEASE

Offense Level: Felony

Offense Date (on or about): 04/01/2014

Control #(ICR#): 15009582

Charge Description: That on or about April 2014, in Plymouth, Hennepin County, Minnesota, MICHAEL BRUCE CAMERON, born 7/16/1962 engaged in sexual contact with an adult female, knowing or having reason to know that the victim was mentally impaired, mentally incapacitated or physically helpless.

STATEMENT OF PROBABLE CAUSE

Complainant has investigated the facts and circumstances of this offense and believes the following establishes probable cause:

On March 4, 2015, a known twenty year-old adult female, hereinafter referred to as Victim, contacted the Plymouth Police Department to report two separate instances of sexual assault. The suspect in both instances is the Defendant, Michael Bruce Cameron, DOB 7/16/62. Victim's family and Defendant's family have been mutual friends for over twenty years.

Victim reported that in April 2014, she slept over at the Defendant's residence in the city of Plymouth, Hennepin County, Minnesota, at the request of her friend, Witness A, the Defendant's twenty year-old daughter. Defendant has a bedroom upstairs in a split entry style home. Defendant's wife sleeps in a separate bedroom downstairs.

On that night in April 2014, in preparation for going to sleep in Defendant's home, Victim and Witness A laid blankets down on the floor of the lower level. Defendant brought them a snack of graham crackers with frosting. Victim and Witness A ate the snack. Defendant began to massage the feet of both girls. Victim recalled that she and Witness A both became very sleepy and quickly fell asleep that night.

Sometime later, Victim woke up in a groggy state to Defendant kissing her and whispering in her ear that he loved her. He rubbed his hand on her breasts underneath her clothing. Defendant placed Victim's hand on his penis and rubbed it up and down. Victim recalled feeling very confused and feeling like what was happening was all a dream. When Victim woke up the next morning, she noticed that the shirt she was wearing was misshapen and all stretched out. Victim divulged what happened to a male friend, but took no further action to report what happened to police authority at that time.

Then, on February, 13, 2015, Victim was again invited to spend the night at Defendant's residence in the City of Plymouth, Hennepin County, Minnesota. Just as before, she and Witness A prepared a bed by laying blankets on the floor of the downstairs room. Just like last April, Defendant brought them both graham crackers with frosting. Shortly after eating the graham crackers with frosting the girls started to watch a movie. Victim described how she and Witness A both discussed feeling very dizzy and they were stumbling around. They both became very tired. They fell asleep next to each other on the floor at around 11:00 pm.

Sometime later Victim was aware that Defendant was lying next to her on the floor. He was kissing her and whispering in her ear that he loved her. She recalled feeling "very fuzzy." Victim does not remember going upstairs to Defendant's bedroom, but she recalls being in that room, when Defendant removed a vibrator from a bag. He placed the vibrator into Victim's vagina, fondled her breasts and inserted his finger into her vagina. She also felt him penetrate her anus. Victim recalls having difficulty walking downstairs to return to the lower level, pushing the defendant away from her while she stumbled down the stairs.

In both these instances, Victim did not consent to sexual activity.

The next morning, Victim noticed that her glasses were not where she placed them the night before. Victim went into the bathroom and had a bowel movement, at which time she noticed that she was bleeding from her anus. Victim discussed with Witness A about how strange they both felt last night, but Victim did not reveal what happened to her at that time. She stated it all felt so surreal.

Victim eventually confided in her mother about what happened. Victim's mother revealed that a similar

incident happened to her a few years ago when she fell asleep after Defendant gave her a beverage to drink. The following day, Defendant apologized to Victim's mother for touching her breasts and buttocks without her consent.

During further investigation of this matter, police learned that Defendant confided in Victim's father, Witness B, that in the past, Defendant drugged his wife in order to engage in sexual activity with her. During a search of the Defendant's home, police recovered graham crackers and frosting. A Patient Rx History Report revealed that Defendant regularly fills a prescription for Triazolam, commonly referred to as sleeping pills, used to treat insomnia. Witness A refused to be interviewed by law enforcement. Defendant's arrest is necessary to prevent imminent harm to others. The investigation remains on-going.

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

Amy Goodwin
Patrol Officer
3400 Plymouth Blvd
Plymouth, MN 55447-1482
Badge: 87

Electronically Signed:
05/08/2015 02:07 PM

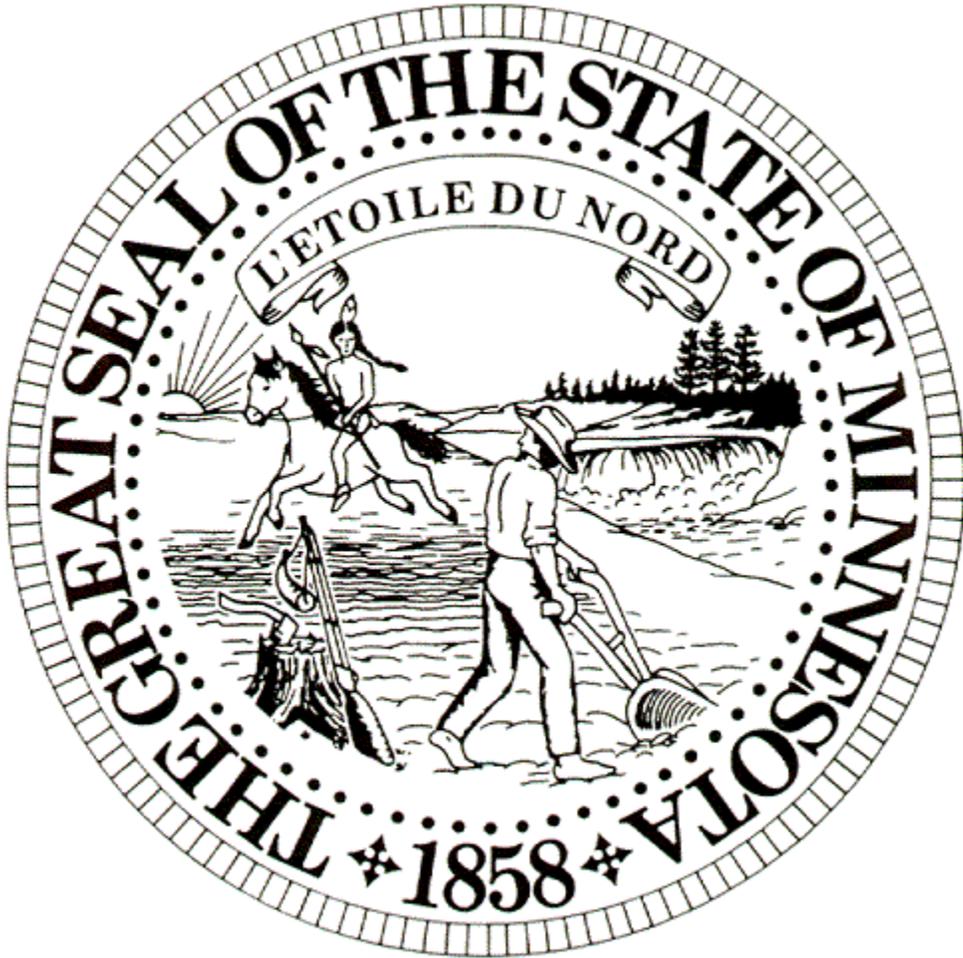
Subscribed and

Notary Public (
Judicial Officia

31/2020

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Prosecuting At



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 _____, _____ at _____ AM/PM before the above-named court at 401 Fourth Avenue S, Minneapolis, MN 55415 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: \$150,000.00

Conditions of Release: No Contact with Victim; No Contact with Witnesses; Make All Appearances; Remain Law Abiding;

Other: No unsupervised contact with his daughters

This complaint is issued by the undersigned Judge as of the following date: May 8, 2015.

Judicial Officer

Bev Benson

Electronically Signed: 05/08/2015 03:14 PM

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

**COUNTY OF HENNEPIN
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

MICHAEL BRUCE CAMERON

Defendant

Clerk's Signature or File Stamp:

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: