

State of Minnesota
County of St. Louis

District Court
6th Judicial District

Prosecutor File No. 19-07-155083
Court File No. 69DU-CR-19-2469

State of Minnesota,
Plaintiff,

COMPLAINT
Summons

vs.

MICHAEL CLARENCE BRYANT DOB: 12/15/1972

Wrenshall, MN 55797
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-Psychotherapist-During Session

Minnesota Statute: 609.344.1(h)(i), with reference to: 609.344.2(1)

Maximum Sentence:

Offense Level: Felony

Offense Date (on or about): 01/01/2017 to 02/05/2019

Control #(ICR#): 19018291

Charge Description: That the defendant, MICHAEL CLARENCE BRYANT, did engage in sexual penetration with another person, to-wit: A.J.C., and the defendant is a psychotherapist and the complainant is a patient of the psychotherapist, that being while acting as or purporting to be a social worker performing or purporting to perform psychotherapy for Victim during the psychotherapy session.

COUNT II

Charge: Criminal Sex Cond-3rd Degree-Psychotherap-Outside Session

Minnesota Statute: 609.344.1(h)(ii), with reference to: 609.344.2(1)

Maximum Sentence:

Offense Level: Felony

Offense Date (on or about): 01/01/2017 to 02/05/2019

Control #(ICR#): 19018291

Charge Description: That the defendant, MICHAEL CLARENCE BRYANT, did engage in sexual penetration with another person, to-wit: A.J.C., and the defendant is a psychotherapist and the complainant is a patient of the psychotherapist, that being while acting as or purporting to be a social worker performing or purporting to perform psychotherapy for Victim outside the psychotherapy session. Consent by the complainant is not a defense.

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

On or about February 5, 2019, investigators from the Duluth Police Department received a report of ongoing sexual abuse of a vulnerable adult, namely a female with the initials A.J.C., the Victim herein. The report indicated the Victim had an ongoing relationship with her social worker, MICHAEL CLARENCE BRYANT, the Defendant herein. The Defendant is a licensed social worker and purported to provide ongoing counseling services as part of his oversight of the Victim and her children.

The Victim also receives ongoing therapeutic care through North Homes. Her therapist reported the ongoing abuse after observing behavior she deemed as "odd" from the Defendant towards the Victim. Specifically, she noted the Defendant would make comments to the Victim about how she would wear her hair, nails, and make up. After the therapist reported said information to the Defendant's employer, the Victim advised that she and the Defendant had been having a sexual relationship for over one year. During that disclosure, the Victim told her therapist that the Defendant made her strip naked, get down on her knees, and beg for forgiveness. The Victim said this occurred at her residence located in St. Louis County, Minnesota. The Defendant had been assigned as the Victim's social worker for services received by the County for well over a year. The Victim also reported the Defendant would tell her if she did not have sex with him, he would take her children away and that if she reported the sexual relationship, he would ruin the Victim's life. The therapist further reported that the Defendant had tried to impede on the therapy the Victim was receiving telling her that the counseling through North Homes was not needed and that he could provide the correct therapy and treatment for the Victim.

Investigator Peterson met with the Victim. She reported that she had been working with the Defendant as her assigned social worker since 2017. The Victim said the sexual relationship began in approximately March, 2017 and continued through early 2019 when he was taken off of her case. According to the Victim, the Defendant began first touching her vaginally and eventually led to sexual intercourse. The Victim stated this would happen in her residence in the daytime hours. She said the Defendant would visit her at home and that he would stay there for at least three hours. The Victim estimated they had had sex more than fifty times and that the Defendant would make the Victim take the morning after pill. The Victim noted at first the sexual intercourse was what she would describe as consensual, but became forceful. The Victim detailed the Defendant would become demanding, did not like her seeing another therapist, and would make her strip down naked, get on her knees, and beg him for forgiveness. The Victim also noted the Defendant told her he would get in trouble if his job found out about the sexual relationship and set up rules for her. She said those were to always protect him, don't put themselves in a sexual situation where they could get caught, and never talk about it.

The Victim also reported she had told the Defendant on at least one occasion that she did not want to have sex, but the Defendant pushed her down, held her on the floor, and penetrated her vaginally with his penis. The Victim noted that while she was scared, she was more scared for her daughter who was eleven years old and home at the time.

The Victim also said that due to this relationship, she had no choices in regards to her children. The Victim elaborated that she was required to dress her eleven year old as the Defendant dictated and how to have her hair and make-up done. The Defendant would go to the child's school to ensure the Victim was being obedient. The Victim said she was threatened by the Defendant frequently that if she did not follow his rules, he would take her children away from her.

The Victim went on to report that the Defendant would text her and call her at all times of the day. At one point, he took her phone away and smashed it because he became concerned that their conversations would be retrievable from her phone.

Through their investigation, officers were able to confirm the Defendant was assigned to provide case management services to the Victim and her two children. In case notes by the Defendant, he represented that he was providing mental health services and counseling to the Victim as a social worker employed by St. Louis County. The Defendant was assigned to case management for the family between 2017 and 2019 when he was removed from the Victim's case due to concerns by other mental health professionals that the Defendant was crossing boundaries and behaving inappropriately towards the Victim.

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

Brent Peterson
Police Officer
2030 N Arlington Avenue
Duluth, MN 55811
Badge: 460

Electronically Signed:
07/15/2019 01:25 PM
St. Louis County, Minnesota

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

Prosecuting Attorney

Jessica J. Fralich
Assistant St. Louis County
Attorney
100 N 5th Avenue W
Duluth Courthouse, #501
Duluth, MN 55802
(218) 726-2323

Electronically Signed:
07/14/2019 04:18 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 on _____, _____ at _____ AM/PM before the above-named court at 100 N 5th Avenue W, Duluth, MN 55802-1285 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: July 15, 2019.

Judicial Officer

Sally L. Tarnowski
Judge of District Court

Electronically Signed: 07/15/2019 02:26 PM

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

COUNTY OF ST. LOUIS
STATE OF MINNESOTA

State of Minnesota

Plaintiff

vs.

MICHAEL CLARENCE BRYANT

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: