THE STATE OF IOWA (OR) CITY OF PELLA	FILED	No. FECRO24752
vs Defendant: Patrick Edouard	11 MAR 24 PM 2: 26	CTT
Address: Previous address: 506 Brabant Laan Pella, Iowa, 50219	a coupt	
Current address: Unknown	CLERK DISTRICT COURT MARION COUNTY, IA.	COMPLAINT AND A FEID AVIT
DOB: 10-09-69	110	COMPLAINT AND AFFIDAVIT
The defendant is accused of the crime of Sexual Ab	ouse in the Third Degree, in vi	iolation of Section 709.4 of the Iowa Code (or
Ordinance No. of the City of Pella) in that the Defer	ndant, on or about early 2006,	at 22 Cedar Street, Pella, Iowa, performed a sex act
by force and/or against the will of the other person	on; Sexual Abuse in the	Third Degree is a class "C" felony.
Complainant Lieutenant John NanHaaften	614 Main, Pella, I Complainant	
STATE OF IOWA, COUNTY OF MARION, ss:	AFFIDAVIT	
I, the undersigned, being duly sworn, state that the my belief that the Defendant committed this crime.	following facts known by me,	or told to me by other reliable person, form the basis for
Patrick Edouard began hugging and kissing her of Edouard pulled her to the floor where he perform genitalia of another, knowing the act was against	ce and/or against her will. The came to meet him for prodespite her instruction to stop ned a sex act, which included her will. The act was coupled	tor of Covenant Reformed Church, Pella, Iowa, e sex act occurred in his former study in the rivate counseling. During that counseling session, o. Ignoring her unwillingness and resistance, Patrick contact between the genitalia of one person and the with and followed by warnings that if she raised an ual Abuse in the Third Degree, a class "C" felony.
		Lieutenant John Van Haaften
Subscribed and sworn to before me by the pay of Much 2011.	person signing this complaint a	Audition this 23rd Audition this 23rd Notary Public - (Deputy) Clerk - Magistrate
Complaint and affidavit filed thisday of	, 2011, a	nd probable cause found that the
Citation issued.		
P Commission	AH KINGREY on Number 733022 milesion Expires	Magistrate

THE STATE OF IOWA (OR) CITY OF PELLA	F/1_1_12	26	No. FECRO24752
vs Defendant: Patrick Edouard	11 MAR 24 PM 2: 6		No. FECRO24752
Address: Previous address: 506 Brabant L Pella, Iowa, 50 Current address: Unknown DOB: 10-09-69	0219 CLERK DISTRICT CO MARION COUNTY.	DURT IA. COM	MPLAINT AND AFFIDAVIT
The defendant is accused of the crime of So Ordinance No. of the City of Pella) in that			
performed a sex act by force and/or agai		350	
felony.		,	
Complainant Lieutenant John VanHaaften	614	Main, Pella, IA 50219-1718 Complainant's Address	
	AFFIDA	AVIT	
STATE OF IOWA, COUNTY OF MARION, se			
I, the undersigned, being duly sworn, stat my belief that the Defendant committed thi		nown by me, or told to me b	y other reliable person, form the basis for
On or about the latter part of Augus	t, 2007, Patrick Edouard	d, DOB, 10-09-69, then	pastor of Covenant Reformed
Church, Pella, Iowa, performed a sex			
included contact between the mouth	70 m		
The sex act included his overpowerin			The state of the s
was followed by repeated reminders forgive her if told. Patrick Edouard			
lorgive her it tolu. Tatrick Edouard	is charged with Sexual A	Lieutenant Joh	Souther
Subscribed and sworn to before m Day of Mach 2011.	e by the person signing this	complaint and affidavit on	this 23rd Lingley lic-(Deputy) Gerk – Magistrate
Complaint and affidavit filed this	day of	, 2011, and probable caus	e found that the
Citation issued.	SARAH KINGREY ommission Number 733022 My Commission Expires		Magistrate

THE STATE OF IOWA

(OR) CITY OF PELLA	1 1 2 25		No. FECRO 24752
vs Defendant: Patrick Edouard	11 MAR 24 PM 2: 25		No. FECRO 24752
Address: Previous address: 506 Brab Pella, Io Current address: Unknown	vant Laan wa, 50219 FRIK UISTROT COUR		CI III
DOB: 10-09-69	Mich	COM	IPLAINT AND AFFIDAVIT
	of Council Abuse in the Third l	Dogues in violetian of Section	on 700 A of the Jove Code (or
The defendant is accused of the crime Ordinance No. of the City of Pella) in			8, at 22 Cedar Street in Pella, Iowa,
performed a sex act by force and/or			
felony.		· 	
Complainant Lieutenant John Van Haaften	614	Main, Pella, IA 50219-1718 Complainant's Address	
		SEL MANUAL DISEASE OF THE CONTROL OF THE SELECTION OF THE	
On or about the latter part of April lowa, performed a sex act with contassement of 22 Cedar Street, Pella, counseling session, Patrick Edouard times. He ordered her to stay put a resistance, Patrick Edouard perfor	n, state that the following facts known and the color of	nown by me, or told to me by 10-09-69, then pastor of C gainst her will. The sex act thim at his request for pri er. tried to get away fr en she tried to evade him. contact between the genitali d with and followed by stere would make sure everyone	occurred in his former study in the vate counseling. During that form him and pushed him back several Ignoring her unwillingness and ia of one person and the genitalia of n warnings that if she raised an alarm
		Lieutenant John	van Haaften
Subscribed and sworn to bef Day of Mach 2011.	ore me by the person signing this	Xatak	this 23rd Lingue ic (Deputy) Clerk - Magistrate
Complaint and affidavit filed this_ Defendant committed the offense charged Warrant issued. Bail is set at \$, 2011, and probable cause	e found that the
Citation issued.			
Service Control	SARAH KINGREY Commission Number 733022 My Commission Expires		Magistrate

THE STATE OF IOWA

(OR) CITY OF PELLA	7.7	NO. FECRO24752
vs Defendant: Patrick Edouard	11 HAR 24 PM 2: 26	1 4102/102
Address: Previous address: 506 Brabant Laan Pella, Iowa, 50219 Current address: Unknown	CLERK LISTECT COURT MARION COUNTY, IA.	C7 1V
DOB: 10-09-69	Weter	COMPLAINT AND AFFIDAVIT
The defendant is accused of the crime of Sexual Explo	oitation by a Counselor, Therapist	or School Employee (including clergy), in
violation of Section 715.15 of the Iowa Code (or Ordin	nance No. of the City of Pella) in tha	t the Defendant, on or about the latter part of
August, 2007, within Marion County, Iowa, sexually	y exploited ., an emotionally	dependent congregant, while her pastor and
as part of a pattern or practice or scheme of conduc	ct to perpetrate sexual conduct wi	th her and others for the purpose of arousing
or satisfying his or her sexual desires. Such Sexual	Exploitation by a Counselor, The	rapist or School Employee (including clergy)
is a class "D" felony. Seen Man Hagten Complainant Lieutenant John YanHaaften	614 Main, Pella, IA 50219 Complainant's Address	
	AFFIDAVIT	
STATE OF IOWA, COUNTY OF MARION, ss:	ATIDATI	
I, the undersigned, being duly sworn, state that the fo my belief that the Defendant committed this crime.	ollowing facts known by me, or told	to me by other reliable person, form the basis for
On or about the latter part of August, 2007, Patrick Iowa, performed a sex act with congregant whad reason to know was emotionally dependent at the contact between the genitalia of one person and the pattern or practice or scheme by Patrick Edouard the emotionally dependent female congregants for the porthe other victims over a prolonged period of time position to learn and eventually exploit his victims' Counselor, Therapist, or School Employee (including	tho was the subject of his counseling the time. The sex act, which occurring genitalia of another person. This is to engage in sexual conduct which ourpose of arousing or satisfying the from 2003 through 2010. During individual circumstances and weating clergy) is a class "D" felony.	ng and pastoral care and whom he knew or red within Marion County, Iowa, included act of sexual exploitation was part of a he perpetrated against as well as other he sexual desires of Patrick Edouard, that time Patrick Edouard used his pastoral
Subscribed and sworn to before me by the per Day of Much 2011.	Sa	avit on this 33rd (a) Lingue Gotter Magistrate
Complaint and affidavit filed thisday of	, 2011, and proba	ible cause found that the
Citation issued.		
SAR/	AH KINGREY Ion Number 733022 Immission Expires	Magistrate

THE STATE OF IOWA

(OR) CITY OF PELLA	FILED	No. FECRO24752
Defendant: Patrick Edouard	0.05	CT V.
Address: Previous address: 506 Brabant Laan Pella, Iowa, 50219 Current address: Unknown DOB: 10-09-69	CLERK DISTRICT COURT MARION COUNTY, IA.	COMPLAINT AND AFFIDAVIT
The defendant is accused of the crime of Sexual Explo		t or School Employee (including clergy), in
violation of Section 715.15 of the Iowa Code (or Ordin	(3d) 7.	
within Marion County, Iowa, sexually exploited	, an emotionally dependent con	gregant, while her pastor and as part of a
pattern or practice or scheme of conduct to perpetr	ate sexual conduct with her and o	others for the purpose of arousing or satisfying
his or her sexual desires. Such Sexual Exploitation	by a Counselor, Therapist or Sch	ool Employee (including clergy) is a class "D"
Complainant Lieutenant John VanHaaften	614 Main, Pella, IA 5021 Complainant's Addres	
	AFFIDAVIT	
STATE OF IOWA, COUNTY OF MARION, ss:		
I, the undersigned, being duly sworn, state that the fo my belief that the Defendant committed this crime.	llowing facts known by me, or told	to me by other reliable person, form the basis for
On or about May of 2008, Patrick Edouard, DOB, 1 sex act with congregant who was the subject of was emotionally dependent at the time. The sex act, genitalia of one person and the genitalia of another, act of sexual exploitation was part of a pattern or properpetrated against as well as other emotional sexual desires of Patrick Edouard. or the other time Patrick Edouard used his pastoral position to I weaknesses. Such Sexual Exploitation by a Counselo	f his counseling and pastoral care which occurred within Marion C was accompanied by other sexua ractice or scheme by Patrick Edouly dependent female congregants r victims over a prolonged period earn and eventually exploit his vior, Therapist, or School Employed	and whom he knew or had reason to know founty, Iowa, included contact between the I conduct including kissing and touching. This ward to engage in sexual conduct which he for the purpose of arousing or satisfying the of time from 2003 through 2010. During that ctims' individual circumstances and
	,	
Subscribed and sworn to before me by the per- Day of Mach 2011.	Sac	Dayit on this 23rd Language Magistrate
Complaint and affidavit filed thisday of	, 2011, and prob	able cause found that the
Citation issued.		
SARAH KI Commission Nu My Commission	mber 733022	Magistrate

THE STATE OF IOWA	Before Magistrate ECRO24/52
THE STATE OF IOWA THE County OF MARION COURT VSERVE AND C	Criminal Number
VSERK COLINIA	
Edouard, Patrick MARILLA	CTVI
2555 76 th St.	O. VI
Byron Center, MI 49315	
	T AND AFFIDAVIT
The defendant is accused of the crime of sexual exploitation by 709.15 of the Iowa Criminal Code/2010 in that the defendant or in MARION County, did sexually exploit pastor and as part of a pattern or practice of conduct to perpetrator satisfying his or her sexual desires.	y a counselor or therapist(D Felony) in violation of Section or about May 2008 thru June 2010, at .(victim), an emotionally dependant congregant, while her te sexual conduct with her and others for the purpose of arousing
THEREFORE, Complainant requests that said Defendant, subjection (1) be arrested or that other lawful steps be taken to obtain December (2) be detained, if already in custody, pending further proceed and that said Defendant otherwise be dealt with according to law	fendants appearance in court; or ings;
	Complainant Signature of Complainant
STATE OF IOWA, MARION ss	
basis for my belief that the Defendant committed this crime. O pastor of Covenant Reformed Church in Pella, IA performed a counseling and pastoral care and whom he knew or had reason which occurred within Marion County, included contact between accompanied by other sexual conduct including kissing and tou sexual exploitation was part of a pattern or practice by Mr. Edo	to know was emotionally dependent at the time. The sex act, en the genitalia of one person and the genitalia of another, was ching. This conduct continued through June of 2010. This act of uard to engage in sexual conduct which he perpetrated against a for the purpose of arousing or satisfying the sexual desires of of time from 2003 to 2010. During that time Mr. Edourad used his
	Signature of Affiant
COMMISSION MY COMMI	JERKINS ON NO. 742784 SSION EXPIRES Signature of Notary
Complaint and arroadings/ med and products state found may	
	Signature of Magistrate

STATE OF IOWA, Plaintiff, PM 2: 27 Case # TECROZA152
vs. Patrick Edouard Defendant. UERK USTROT Indictable Charges MARION COUNTRICE
The Court finds probable cause on the following charge(s):
<u>Charges</u> <u>Bond or O.R.</u>
Sexual Exploitation by Coursels 3 Counts D Felony \$) 45,000
Sexual Exploitation by Counselos 3 Counts D. Felony \$) 45,000 Sexual abuse in 3rd Degree 3 Counts C. Felony \$
Defendant shall surrender his passport within \$ 45 hours
\$
Bond:
Defendant Information: Age 41 Address 2555 76 St SW
Employment: Byron Center Michigan 4931
On Probation or Parole: No Attorney: F. Montgowey Brown
V Preliminary Hearing set for 4 −1 − 11 at 9:30 Am
Other Proceedings set for at
To the Marion County Sheriff or other law enforcement agency:
✓ You are commanded to receive the defendant into your custody and detain the defendant in
jail until legally discharged. You are commanded to forthwith discharge the defendant from custody.
Dated: 3-24-11 Terry AWilson Judge
Copy given to the defendant. Copy given to Sheriff's Office or law enforcement officer. Copy given to County Attorney's Office. Wantgoweg Rower Copy given to County Attorney's Office.
ACCUSED PERSONS HAVE THESE AND OTHER RIGHTS: To retain counsel, and to request the appointment of counsel
To be admitted to pretrial release on reasonable terms
To have the conditions of release reviewed with assistance of counsel after 24 hours To make no statement (whatever you say may be used against you)
To have a preliminary hearing within 10 days if in custody (otherwise within 20 days)

<u>ADA ASSISTANCE</u>: If you require the assistance of auxiliary aids or services to participate in court because of a disability, immediately call your district ADA coordinator at 515-286-3394. (If you are hearing impaired, call Relay lowa TTY at 1-800-735-2942.)

To have a finding of probable cause made at initial appearance