

IN THE IOWA DISTRICT COURT IN AND FOR MARION COUNTY

THE STATE OF IOWA  
(OR)  
CITY OF PELLA

vs  
Defendant: Patrick Edouard

Address: Previous address: 506 Brabant Laan  
Pella, Iowa, 50219  
Current address: Unknown

DOB: 10-09-69

FILED

11 MAR 24 PM 2:26

CLERK DISTRICT COURT  
MARION COUNTY, IA.

No. FECRO24752  
CTI

COMPLAINT AND AFFIDAVIT

The defendant is accused of the crime of **Sexual Abuse in the Third Degree**, in violation of Section 709.4 of the Iowa Code (or Ordinance No. of the City of Pella) in that the Defendant, 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; **Sexual Abuse in the Third Degree** is a class "C" felony.

John Van Haften  
Complainant Lieutenant John VanHaften

614 Main, Pella, IA 50219-1718

Complainant's Address

AFFIDAVIT

STATE OF IOWA, COUNTY OF MARION, ss:

I, the undersigned, being duly sworn, state that the following facts known by me, or told to me by other reliable person, form the basis for my belief that the Defendant committed this crime.

On or about the early part of 2006, Patrick Edouard, DOB, 10-09-69, then pastor of Covenant Reformed Church, Pella, Iowa, performed a sex act with congregant **██████████** by force and/or against her will. The sex act occurred in his former study in the basement of 22 Cedar Street, Pella, Iowa, where **██████████** came to meet him for private counseling. During that counseling session, Patrick Edouard began hugging and kissing her despite her instruction to stop. Ignoring her unwillingness and resistance, Patrick Edouard pulled her to the floor where he performed a sex act, which included contact between the genitalia of one person and the genitalia of another, knowing the act was against her will. The act was coupled with and followed by warnings that if she raised an alarm he would say she initiated the act. Patrick Edouard is charged with Sexual Abuse in the Third Degree, a class "C" felony.

John Van Haften  
Lieutenant John Van Haften

Subscribed and sworn to before me by the person signing this complaint and affidavit on this 23rd  
Day of March 2011.

Sarah Kingrey  
Notary Public - (Deputy) Clerk - Magistrate

Complaint and affidavit filed this \_\_\_\_\_ day of \_\_\_\_\_, 2011, and probable cause found that the Defendant committed the offense charged.

Warrant issued. Bail is set at \$ \_\_\_\_\_.

Citation issued.

Magistrate



IN THE IOWA DISTRICT COURT IN AND FOR MARION COUNTY

THE STATE OF IOWA  
(OR)  
CITY OF PELLA  
vs  
Defendant: Patrick Edouard

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CLERK DISTRICT COURT  
MARION COUNTY, IA.

No. FECRO24752

CT II

Address: Previous address: 506 Brabant Laan  
Pella, Iowa, 50219  
Current address: Unknown

COMPLAINT AND AFFIDAVIT

DOB: 10-09-69

The defendant is accused of the crime of **Sexual Abuse in the Third Degree**, in violation of Section 709.4 of the Iowa Code (or Ordinance No. of the City of Pella) in that the Defendant, on or about the latter part of August, 2007, within Marion County, Iowa, performed a sex act by force and/or against the will of the other person, [REDACTED] Sexual Abuse in the Third Degree is a class "C" felony.

John Van Haften  
Complainant Lieutenant John VanHaften

614 Main, Pella, IA 50219-1718  
Complainant's Address

AFFIDAVIT

STATE OF IOWA, COUNTY OF MARION, ss:

I, the undersigned, being duly sworn, state that the following facts known by me, or told to me by other reliable person, form the basis for my belief that the Defendant committed this crime.

On or about the latter part of August, 2007, Patrick Edouard, DOB, 10-09-69, then pastor of Covenant Reformed Church, Pella, Iowa, performed a sex act with congregant [REDACTED] by force and/or against her will. The sex act, which included contact between the mouth of one person and the genitalia of another, occurred within Marion County, Iowa. The sex act included his overpowering her while ignoring her stated refusal and her physical resistance. The incident was followed by repeated reminders that no one could be told about it and that her husband and family would not forgive her if told. Patrick Edouard is charged with Sexual Abuse in the Third Degree, a class "C" felony.

John Van Haften  
Lieutenant John Van Haften

Subscribed and sworn to before me by the person signing this complaint and affidavit on this 23rd  
Day of March 2011.

Sarah Kingrey  
Notary Public - (Deputy) Clerk - Magistrate

Complaint and affidavit filed this \_\_\_\_\_ day of \_\_\_\_\_, 2011, and probable cause found that the Defendant committed the offense charged.  
Warrant issued. Bail is set at \$ \_\_\_\_\_.

Citation issued.



\_\_\_\_\_  
Magistrate



IN THE IOWA DISTRICT COURT IN AND FOR MARION COUNTY

THE STATE OF IOWA  
(OR)  
CITY OF PELLA

vs  
Defendant: Patrick Edouard

Address: Previous address: 506 Brabant Laan  
Pella, Iowa, 50219  
Current address: Unknown

FILED  
11 MAR 24 PM 2:25  
CLERK DISTRICT COURT  
MARION COUNTY IA

No. FECRO 24752  
CT III

COMPLAINT AND AFFIDAVIT

DOB: 10-09-69

The defendant is accused of the crime of **Sexual Abuse in the Third Degree**, in violation of Section 709.4 of the Iowa Code (or Ordinance No. of the City of Pella) in that the Defendant, on or about the latter part of April, 2008, at 22 Cedar Street in Pella, Iowa, performed a sex act by force and/or against the will of the other person, [REDACTED] Sexual Abuse in the Third Degree is a class "C" felony.

John Van Haaften  
Complainant Lieutenant John VanHaaften

614 Main, Pella, IA 50219-1718  
Complainant's Address

AFFIDAVIT

STATE OF IOWA, COUNTY OF MARION, ss:

I, the undersigned, being duly sworn, state that the following facts known by me, or told to me by other reliable person, form the basis for my belief that the Defendant committed this crime.

On or about the latter part of April, 2008, Patrick Edouard, DOB, 10-09-69, then pastor of Covenant Reformed Church, Pella, Iowa, performed a sex act with congregant [REDACTED] by force and/or against her will. The sex act occurred in his former study in the basement of 22 Cedar Street, Pella, Iowa, where [REDACTED] came to meet him at his request for private counseling. During that counseling session, Patrick Edouard began hugging and kissing her. [REDACTED] tried to get away from him and pushed him back several times. He ordered her to stay put and be quiet and said, "No!" when she tried to evade him. Ignoring her unwillingness and resistance, Patrick Edouard performed a sex act, which included contact between the genitalia of one person and the genitalia of another, knowing the act was against her will. The act was coupled with and followed by stern warnings that if she raised an alarm it would be her word against his, she would not be believed and he would make sure everyone knew she was crazy. Patrick Edouard is charged with Sexual Abuse in the Third Degree, a class "C" felony.

John Van Haaften  
Lieutenant John Van Haaften

Subscribed and sworn to before me by the person signing this complaint and affidavit on this 23rd  
Day of March 2011.

Sarah Kingrey  
Notary Public - (Deputy) Clerk - Magistrate

Complaint and affidavit filed this \_\_\_\_\_ day of \_\_\_\_\_, 2011, and probable cause found that the Defendant committed the offense charged.

Warrant issued. Bail is set at \$ \_\_\_\_\_.

Citation issued.



\_\_\_\_\_  
Magistrate

IN THE IOWA DISTRICT COURT IN AND FOR MARION COUNTY

THE STATE OF IOWA  
(OR)  
CITY OF PELLA

vs  
Defendant: Patrick Edouard

Address: Previous address: 506 Brabant Laan  
Pella, Iowa, 50219  
Current address: Unknown

DOB: 10-09-69

FILED  
11 MAR 24 PM 2:26  
CLERK DISTRICT COURT  
MARION COUNTY, IA.

No. FECRO24752  
CT IV

COMPLAINT AND AFFIDAVIT

The defendant is accused of the crime of Sexual Exploitation by a Counselor, Therapist or School Employee (including clergy), in violation of Section 715.15 of the Iowa Code (or Ordinance No. of the City of Pella) in that the Defendant, on or about the latter part of August, 2007, within Marion County, Iowa, sexually exploited [REDACTED], an emotionally dependent congregant, while her pastor and as part of a pattern or practice or scheme of conduct to perpetrate sexual conduct with her and others for the purpose of arousing or satisfying his or her sexual desires. Such Sexual Exploitation by a Counselor, Therapist or School Employee (including clergy) is a class "D" felony.

John Van Haaften  
Complainant Lieutenant John VanHaaften

614 Main, Pella, IA 50219-1718

Complainant's Address

AFFIDAVIT

STATE OF IOWA, COUNTY OF MARION, ss:

I, the undersigned, being duly sworn, state that the following facts known by me, or told to me by other reliable person, form the basis for my belief that the Defendant committed this crime.

On or about the latter part of August, 2007, Patrick Edouard, DOB, 10-09-69, then pastor of Covenant Reformed Church, Pella, Iowa, performed a sex act with congregant [REDACTED] who was the subject of his counseling and pastoral care and whom he knew or had reason to know was emotionally dependent at the time. The sex act, which occurred within Marion County, Iowa, included contact between the genitalia of one person and the genitalia of another person. This act of sexual exploitation was part of a pattern or practice or scheme by Patrick Edouard to engage in sexual conduct which he perpetrated against [REDACTED] as well as other emotionally dependent female congregants for the purpose of arousing or satisfying the sexual desires of Patrick Edouard, [REDACTED] or the other victims over a prolonged period of time from 2003 through 2010. During that time Patrick Edouard used his pastoral position to learn and eventually exploit his victims' individual circumstances and weaknesses. Such Sexual Exploitation by a Counselor, Therapist, or School Employee (including clergy) is a class "D" felony.

John Van Haaften  
Lieutenant John Van Haaften

Subscribed and sworn to before me by the person signing this complaint and affidavit on this 23rd  
Day of March, 2011.

Sarah Kingrey  
Notary Public - (Deputy) Clerk - Magistrate

Complaint and affidavit filed this \_\_\_\_\_ day of \_\_\_\_\_, 2011, and probable cause found that the Defendant committed the offense charged.

Warrant issued. Bail is set at \$ \_\_\_\_\_.

Citation issued.



Magistrate



IN THE IOWA DISTRICT COURT IN AND FOR MARION COUNTY

THE STATE OF IOWA  
(OR)  
CITY OF PELLA  
vs  
Defendant: Patrick Edouard

FILED  
11 MAR 24 PM 2:25  
CLERK DISTRICT COURT  
MARION COUNTY, IA.

No. FECRO24752  
CT V

Address: Previous address: 506 Brabant Laan  
Pella, Iowa, 50219  
Current address: Unknown

DOB: 10-09-69

709.15

COMPLAINT AND AFFIDAVIT

The defendant is accused of the crime of Sexual Exploitation by a Counselor, Therapist or School Employee (including clergy), in violation of Section 715.15 of the Iowa Code (or Ordinance No. of the City of Pella) in that the Defendant, on or about May of 2008, within Marion County, Iowa, sexually exploited [REDACTED], an emotionally dependent congregant, while her pastor and as part of a pattern or practice or scheme of conduct to perpetrate sexual conduct with her and others for the purpose of arousing or satisfying his or her sexual desires. Such Sexual Exploitation by a Counselor, Therapist or School Employee (including clergy) is a class "D" felony.

[Signature]  
Complainant Lieutenant John VanHaften

614 Main, Pella, IA 50219-1718  
Complainant's Address

AFFIDAVIT

STATE OF IOWA, COUNTY OF MARION, ss:

I, the undersigned, being duly sworn, state that the following facts known by me, or told to me by other reliable person, form the basis for my belief that the Defendant committed this crime.

On or about May of 2008, Patrick Edouard, DOB, 10-09-69, then pastor of Covenant Reformed Church, Pella, Iowa, performed a sex act with congregant [REDACTED] who was the subject of his counseling and pastoral care and whom he knew or had reason to know was emotionally dependent at the time. The sex act, which occurred within Marion County, Iowa, included contact between the genitalia of one person and the genitalia of another, was accompanied by other sexual conduct including kissing and touching. This act of sexual exploitation was part of a pattern or practice or scheme by Patrick Edouard to engage in sexual conduct which he perpetrated against [REDACTED] as well as other emotionally dependent female congregants for the purpose of arousing or satisfying the sexual desires of Patrick Edouard, [REDACTED], or the other victims over a prolonged period of time from 2003 through 2010. During that time Patrick Edouard used his pastoral position to learn and eventually exploit his victims' individual circumstances and weaknesses. Such Sexual Exploitation by a Counselor, Therapist, or School Employee (including clergy) is a class "D" felony.

[Signature]  
Lieutenant John Van Haften

Subscribed and sworn to before me by the person signing this complaint and affidavit on this 23rd  
Day of March 2011.

[Signature]  
Notary Public - (Deputy) Clerk - Magistrate

Complaint and affidavit filed this \_\_\_\_\_ day of \_\_\_\_\_, 2011, and probable cause found that the Defendant committed the offense charged.

Warrant issued. Bail is set at \$ \_\_\_\_\_.

Citation issued.



Magistrate

IN THE IOWA DISTRICT COURT IN AND FOR MARION COUNTY

THE STATE OF IOWA  
THE County OF MARION

Before Magistrate  
Criminal Number

FECR024-152

Edouard, Patrick  
2555 76<sup>th</sup> St.  
Byron Center, MI 49315  
DOB:10/09/69

VS. IOWA DISTRICT COURT  
MARION COUNTY, IA.

CT VI

COMPLAINT AND AFFIDAVIT

The defendant is accused of the crime of sexual exploitation by a counselor or therapist(D Felony) in violation of Section 709.15 of the Iowa Criminal Code/2010 in that the defendant on or about May 2008 thru June 2010 , at [REDACTED] in MARION County, did sexually exploit [REDACTED].(victim), an emotionally dependant congregant, while her pastor and as part of a pattern or practice of conduct to perpetrate sexual conduct with her and others for the purpose of arousing or satisfying his or her sexual desires.

THEREFORE, Complainant requests that said Defendant, subject to bail or conditions of release where applicable.

- (1) be arrested or that other lawful steps be taken to obtain Defendants appearance in court; or
  - (2) be detained, if already in custody, pending further proceedings;
- and that said Defendant otherwise be dealt with according to law.

Complainant

TRE 63-4  
Signature of Complainant

STATE OF IOWA, MARION ss..

I, the undersigned, being duly sworn, state that the following facts known by me or told to me by other reliable persons form the basis for my belief that the Defendant committed this crime. On or about May of 2008, Patrick Edouard(D.O.B. 10/9/69), then pastor of Covenant Reformed Church in Pella, IA performed a sex act with the congregant [REDACTED] who was the subject of his counseling and pastoral care and whom he knew or had reason to know was emotionally dependant at the time. The sex act, which occurred within Marion County, included contact between the genitalia of one person and the genitalia of another, was accompanied by other sexual conduct including kissing and touching. This conduct continued through June of 2010. This act of sexual exploitation was part of a pattern or practice by Mr. Edouard to engage in sexual conduct which he perpetrated against [REDACTED] as well as other emotionally dependent female congregants for the purpose of arousing or satisfying the sexual desires of Mr. Edouard, [REDACTED], and other victims over a prolonged period of time from 2003 to 2010. During that time Mr. Edouard used his pastoral position to learn and eventually exploit his victims individual circumstances and weaknesses.

TRE 63-4  
Signature of Affiant

Subscribed and sworn to before me by the person(s) signing this complaint (and affidavit(s)) on this 24th day of March, 2011,



[Signature]  
Signature of Notary

Complaint and affidavit(s) filed and probable cause found that the defendant committed the offense charged.

\_\_\_\_\_  
Signature of Magistrate



IN THE IOWA DISTRICT COURT FOR MARION COUNTY

FILED

11 MAR 24 PM 2:27

Case # FECRO24752

STATE OF IOWA,  
Plaintiff,

vs. Patrick Edouard  
Defendant.

CLERK DISTRICT COURT  
MARION COUNTY, IOWA  
Initial Appearance  
Indictable Charges

The Court finds probable cause on the following charge(s):

Charges	Degree	Bond or O.R.
<u>Sexual Exploitation by Counselors 3 counts</u>	<u>D Felony</u>	<u>\$ 45,000</u>
<u>Sexual Abuse in 3rd Degree 3 counts</u>	<u>C Felony</u>	<u>\$</u>

Defendant shall surrender his passport within 48 hours

Bond: + Surety to balance by Craig Baker Signature Craig Baker Cash or Surety  10% Allowed

Defendant Information: Age 41 Address 2555 76<sup>th</sup> St SW

Employment: Byron Center Michigan 49315

On Probation or Parole: NO Attorney: F. Montgomery Brown

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 A Wilson Judge

- Copy given to the defendant.
- Copy given to Sheriff's Office or law enforcement officer.
- Copy given to County Attorney's Office. out 03/24/2011
- J. Montgomery Brown

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)
- To have a finding of probable cause made at initial appearance

ADA ASSISTANCE: 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 Iowa TTY at 1-800-735-2942.)