

# OFFICE OF THE ANOKA COUNTY ATTORNEY

Tony Palumbo, County Attorney

---

2100 3rd Avenue, Suite 720, Anoka, MN 55303  
763-324-5550  
anokacounty.us/attorney  
twitter.com/AnokaCountyAtty  
facebook.com/AnokaCountyAttorneysOffice



## **Media Contact:**

Elizabeth Mohr, ACAO Community Relations Coordinator  
elizabeth.mohr@co.anoka.mn.us  
763-324-5471 (desk)  
612-619-8345 (cell)

**November 1, 2022**

## **FOR IMMEDIATE RELEASE**

### **Sherburne County official charged with stalking, invasion of privacy**

The Anoka County Attorney's Office has filed criminal charges of invasion of privacy and stalking against Sherburne County Commissioner Timothy Dolan.

According to the criminal complaint (attached for reference), Dolan took thousands of photos and videos of his fiancée without her knowledge or permission. The images, which were found on Dolan's electronic devices and in cloud-based photo storage, were taken of the victim in various states of undress while she was in the restroom, changing clothes, or in bed.

The victim was granted a restraining order against Dolan in May, but he continued to contact her.

The charges against Dolan include five gross misdemeanor counts of Interfere with Privacy and one felony count of stalking.

Due to Dolan's position in Sherburne County, the case was referred to avoid a conflict of interest. The investigation was handled by the Anoka County Sheriff's Office. The prosecution is being handled by the Anoka County Attorney's Office.

Court proceedings will take place in Sherburne County. Dolan's first appearance is scheduled for Nov. 16.

###

STATE OF MINNESOTA  
COUNTY OF SHERBURNE

Filed in District Court  
State of Minnesota  
Dated 10/28/22

DISTRICT COURT

TENTH JUDICIAL DISTRICT

COURT FILE NO. 71CR221417  
PROSECUTOR FILE NO. CA-2022-01556

---

State of Minnesota,

Plaintiff,

v.

**COMPLAINT**

**TIMOTHY JAMES DOLAN (DOB: 12/18/1982)**

Summons

13467 212th Avenue NW  
Elk River, MN 55330

Defendant.

---

The Complainant submits this complaint to the Court and states that there is probable cause to believe that the Defendant committed the following offense(s):

**COUNT 1: INTERFERE W/PRIVACY-INSTALL/USE DEVICE-HOTEL/ETC**

Minnesota Statutes §609.746, Subd. 1(d); 609.101

PENALTY: 0-1 Year and/or \$900.00 - \$3,000.00

Offense Level: Gross Misdemeanor

Control #(ICR#): 22-117174

Charge Description: On or about May 25, 2022, in the city of Elk River, County of Sherburne, Minnesota, TIMOTHY JAMES DOLAN, did surreptitiously install or use any device for observing, photographing, recording, amplifying, or broadcasting sounds or events through the window or other aperture of a sleeping room in a hotel, as defined in Minn. Stat. 327.70, subd. 3, a tanning booth, or other place where a reasonable person would have an expectation of privacy and has exposed or is likely to expose their intimate parts, as defined in Minn. Stat. 609.341, subd. 5, or the clothing covering the immediate area of the intimate parts with intent to intrude upon or interfere with the privacy of the occupant, namely Image A, as described in the complaint.

**COUNT 2: INTERFERE W/PRIVACY-INSTALL/USE DEVICE-HOTEL/ETC**

Minnesota Statutes §609.746, Subd. 1(d); 609.101

PENALTY: 0-1 Year and/or \$900.00 - \$3,000.00

Offense Level: Gross Misdemeanor

Control #(ICR#): 22-117174

Charge Description: On or about May 25, 2022, in the city of Elk River, County of Sherburne, Minnesota, TIMOTHY JAMES DOLAN, did surreptitiously install or use any device for

observing, photographing, recording, amplifying, or broadcasting sounds or events through the window or other aperture of a sleeping room in a hotel, as defined in Minn. Stat. 327.70, subd. 3, a tanning booth, or other place where a reasonable person would have an expectation of privacy and has exposed or is likely to expose their intimate parts, as defined in Minn. Stat. 609.341, subd. 5, or the clothing covering the immediate area of the intimate parts with intent to intrude upon or interfere with the privacy of the occupant, namely Image B as described in the complaint.

**COUNT 3: INTERFERE W/PRIVACY-INSTALL/USE DEVICE-HOTEL/ETC**

Minnesota Statutes §609.746, Subd. 1(d); 609.101

PENALTY: 0-1 Year and/or \$900.00 - \$3,000.00

Offense Level: Gross Misdemeanor

Control #(ICR#): 22-117174

Charge Description: On or about May 25, 2022, in the city of Elk River, County of Sherburne, Minnesota, TIMOTHY JAMES DOLAN, did surreptitiously install or use any device for observing, photographing, recording, amplifying, or broadcasting sounds or events through the window or other aperture of a sleeping room in a hotel, as defined in Minn. Stat. 327.70, subd. 3, a tanning booth, or other place where a reasonable person would have an expectation of privacy and has exposed or is likely to expose their intimate parts, as defined in Minn. Stat. 609.341, subd. 5, or the clothing covering the immediate area of the intimate parts with intent to intrude upon or interfere with the privacy of the occupant, namely Image C as described in the complaint.

**COUNT 4: INTERFERE W/PRIVACY-INSTALL/USE DEVICE-HOTEL/ETC**

Minnesota Statutes §609.746, Subd. 1(d); 609.101

PENALTY: 0-1 Year and/or \$900.00 - \$3,000.00

Offense Level: Gross Misdemeanor

Control #(ICR#): 22-117174

Charge Description: On or about May 25, 2022, in the city of Elk River, County of Sherburne, Minnesota, TIMOTHY JAMES DOLAN, did surreptitiously install or use any device for observing, photographing, recording, amplifying, or broadcasting sounds or events through the window or other aperture of a sleeping room in a hotel, as defined in Minn. Stat. 327.70, subd. 3, a tanning booth, or other place where a reasonable person would have an expectation of privacy and has exposed or is likely to expose their intimate parts, as defined in Minn. Stat. 609.341, subd. 5, or the clothing covering the immediate area of the intimate parts with intent to intrude upon or interfere with the privacy of the occupant, namely Image D as described in the complaint.

**COUNT 5: INTERFERE W/PRIVACY-INSTALL/USE DEVICE-HOTEL/ETC**

Minnesota Statutes §609.746, Subd. 1(d); 609.101

PENALTY: 0-1 Year and/or \$900.00 - \$3,000.00

Offense Level: Gross Misdemeanor

Control #(ICR#): 22-117174

Charge Description: On or about May 25, 2022, in the city of Elk River, County of Sherburne,

Minnesota, TIMOTHY JAMES DOLAN, did surreptitiously install or use any device for observing, photographing, recording, amplifying, or broadcasting sounds or events through the window or other aperture of a sleeping room in a hotel, as defined in Minn. Stat. 327.70, subd. 3, a tanning booth, or other place where a reasonable person would have an expectation of privacy and has exposed or is likely to expose their intimate parts, as defined in Minn. Stat. 609.341, subd. 5, or the clothing covering the immediate area of the intimate parts with intent to intrude upon or interfere with the privacy of the occupant, namely Image E as described in the complaint.

**COUNT 6: STALKING - ENGAGES IN STALKING**

Minnesota Statutes §609.749, Subd. 5(a); 609.101  
PENALTY: 0-10 Years and/or \$6,000.00 - \$20,000.00  
Offense Level: Felony

Control #(ICR#): 22-117174

Charge Description: On or about June 1, 2022, in the city of Elk River, County of Sherburne, Minnesota, TIMOTHY JAMES DOLAN, did engage in stalking with respect to a single victim or one or more members of a single household which the actor knows or has reason to know would cause the victim under the circumstances to feel terrorized or to fear bodily harm and which does cause this reaction on the part of the victim.

## STATEMENT OF PROBABLE CAUSE

In May 2022 the Elk River Police Department began investigating a report made by the owner of the Decklan Group, a business in Sherburne County. The sole owner of the Decklan Group is an adult female, hereinafter the victim. The victim told law enforcement her then fiancé, Timothy James Dolan (DOB: 12/18/82), the defendant herein, suffered a medical emergency. The emergency required the victim to return to Minnesota from a trip at the end of May 2022. At that time, the victim and defendant shared a residence on 212<sup>th</sup> Avenue NW in Elk River, Sherburne County. In addition to the personal relationship, the defendant was an employee of the the Decklan Group and was paid monthly. Upon her return to Minnesota, the defendant gave the victim access to his Decklan Group phone and computer so the victim could maintain operation of the business. The defendant would be unable to work given the medical condition and recovery.

When accessing the defendant's business phone, the victim observed a text message between the defendant and a co-worker of his at the defendant's other job at the Sherburne County Government Center. The victim thought the text was inappropriate given the defendant's position with Sherburne County and the other person's position within the County. The victim also observed many images and videos of herself on the defendant's phone which she was unaware of having been taken by the defendant. The victim then observed many images on a Google cloud account which belongs to the defendant via the Decklan Group. The victim estimated she observed over 20,000 images and videos of herself in various stages of undress, nude and/or while engaged in personal hygiene activity. Out of fear and panic, the victim began deleting images and videos from the devices and the Cloud. The victim did, however, save roughly 500 images/videos from the defendant's devices.

Many images and videos of the victim were taken while she was in the bathroom, either changing clothes or in the bathtub or shower, without her knowledge. Many images appear to have been taken either under the bathroom door or between the door and the door frame. Others were taken in the couple's bedroom during sexual relations, without the victim's knowledge or consent. The victim described the phone/camera being set up prior to the intimacy beginning as she had no knowledge of the recording. Some images show the victim's intimate parts and appear to be taken while she is sleeping. The victim said the images were taken at various times and multiple locations, including their residence in Elk River.

The following are specific examples of images found on the defendant's electronic devices in May 2022:

Image A is a photo of the victim while she is naked, taking a shower. The victim states the image was taken without her knowledge or consent and a time and place she expected privacy.

Image B is a photo of the victim while she is naked, taking a shower. The victim states the image was taken without her knowledge or consent and at a time and place she expected privacy.

Image C is a photo of the victim while she is naked in her bathtub. The victim states the image was taken without her knowledge or consent and at a time and place she expected privacy.

Image D is a photo of the victim while she is exposed and using/sitting on the toilet. The victim states the image was taken without her knowledge or consent and at a time and place she expected privacy.

Image E is a photo of the victim naked, bathing in her bathtub. The victim states this image appears to have been taken by the phone being maneuvered under a gap in the closed

bathroom door while the victim was unaware and bathing. The victim states the image was taken without her knowledge and consent and at a time and place she expected privacy.

While discovering the images, the victim also learned of potential unauthorized financial transactions by the defendant of Decklan Group funds totaling hundreds of thousands of dollars. These financial matters are the subject of a separate, on-going investigation. Based on this constellation of information, on May 25<sup>th</sup>, 2022, the victim formally terminated the defendant from employment at the Decklan Group.

Based on the surreptitiously taken images and videos, the victim's expressed fear and/or embarrassment of distribution of the images, and the potential financial losses to the victim and her business, the victim made application and was granted a Harassment Restraining Order in Sherburne County Court on May 31<sup>st</sup>, 2022, Court File 71-CV-22-647. The Order was personally served on the defendant June 1<sup>st</sup>, 2022. The Order precludes the defendant from any harassment of the victim and precludes any contact of the victim by the defendant.

On June 11<sup>th</sup>, 2022, ten days after the HRO was served on the defendant, the defendant used social media and "tagged" the victim's business, the Decklan Group, from his social media account. The victim saw this on social media and caused her fear given the facts that had recently been discovered by the victim.

On June 28<sup>th</sup>, 2022, the defendant again made social media postings, including images of the victim and narrative about the victim, on sites including LinkedIn and Facebook. The defendant again tagged the Decklan Group and a second business owned by the victim, All Day Coach.

On July 23<sup>rd</sup>, 2022, the victim received a text from the defendant asking about a dog and, in part, the following narrative: "Hey there perfect lady :) ...".

On July 27<sup>th</sup>, 2022, the defendant sent a text message to the victim's brother detailing his own feelings about the victim and their past relationship. Given the personal content, the text was forwarded to the victim.

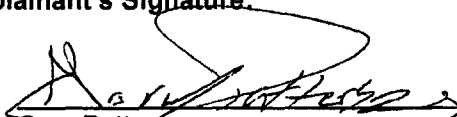
Collectively, these communications made after the service of the HRO caused the victim to feel terrorized.

**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.

Date: 10/28/2022

Complainant's Signature:



Gary Patterson  
Detective  
Anoka County Sheriff's Office  
13301 Hanson Blvd. NW  
Andover, MN 55304  
Badge:

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

**PROSECUTING ATTORNEY'S  
SIGNATURE:**

Date October 28, 2022

/s/ Paul L. Young

Name: Paul L. Young, 24188X  
Assistant Anoka County Attorney  
Anoka County Government Center  
2100 Third Avenue, STE 720  
Anoka, MN 55303  
Phone: (763) 324-5408

**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:

Judicial Officer



Stanfield,  
Jennifer (Anoka  
Judge)

Sworn testimony has been given before the Judicial Officer by the following witness

2022.10.28

**COUNTY OF SHERBURNE  
STATE OF MINNESOTA**

**State of Minnesota**  
Plaintiff vs.  
**Timothy James Dolan**  
Defendant

**15:51:49 -05'00'**  
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: