

State of Minnesota  
County of Blue Earth

District Court  
5th Judicial District

Prosecutor File No. 0070110188  
Court File No. 07-CR-25-2178

State of Minnesota,  
Plaintiff,

**COMPLAINT**  
Summons

vs.

**TAYLOR JAMES MILLER DOB: 07/29/2003**

No Permanent Address  
Mankato, MN 56001

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 Sexual Conduct - 1st Degree - Penetration or Contact under 14 - Actor > 36m older**

Minnesota Statute: 609.342.1a(e), with reference to: 609.342.2(a)

Maximum Sentence: 30 years or \$40,000 fine, or both

Offense Level: Felony

Offense Date (on or about): 01/01/2023

Control #(ICR#): 25000529

Charge Description: On or between January 1, 2023 and June 30, 2024, in Blue Earth County, Minnesota, Taylor James Miller did engage in sexual contact with a victim who was under 14 years of age and the defendant is more than 36 months older (mistake of age is not a defense).

**COUNT II**

**Charge: Criminal Sexual Conduct - 1st Degree - Penetration or Contact under 14 - Actor > 36m older**

Minnesota Statute: 609.342.1a(e), with reference to: 609.342.2(a)

Maximum Sentence: 30 years or \$40,000 fine, or both

Offense Level: Felony

Offense Date (on or about): 01/01/2023

Control #(ICR#): 25000529

Charge Description: On or between January 1, 2023 and June 30, 2024, in Blue Earth County, Minnesota, Taylor James Miller did engage in sexual contact with a victim who was under 14 years of age and the defendant is more than 36 months older (mistake of age is not a defense).

## STATEMENT OF PROBABLE CAUSE

On January 7, 2025, at approximately 12:55 PM, Officer Katelyn Kaiser, with the Mankato Department of Public Safety, was made aware of a report of a past occurred sexual assault involving a five-year-old girl (Victim 1) and an 11-year-old boy (Victim 2). The suspect was identified as 21-year-old Taylor James Miller.

Ofc. Kaiser spoke with Witness 1, the mother of Victim 1, Victim 2 and Miller. Miller is the older brother of Victim 1 and Victim 2. Witness 1 reported that she, her husband, Victim 1, Victim 2 and Miller lived in a mobile home in Blue Earth County from January 2023 to June 2024. Witness 1 stated that there were times when Miller would watch Victim 1 and Victim 2 if she was at work.

Witness 1 stated that she was at a shelter on January 7, 2025, and was told by a friend (Witness 2) that Miller had come inside of the shelter and Victim 1 saw Miller and froze. Witness 2 thought this was an odd reaction to seeing Miller and told Witness 1 about it. Witness 1 then spoke with Victim 1.

Victim 1 told Witness 1 that Miller had touched her “pee pee” with his fingers while using his other hand to cover her mouth. Victim 1 told Witness 1 that it happened “lots” at the “blue trailer” (the mobile home that the family lived in from January 2023 to June 2024). Victim 1 stated that it also happened to Victim 2.

Witness 1 then went to Victim 2’s school to speak with Victim 2. Victim 2 told Witness 1 that Miller had touched his penis and his butt without clothes on (Victim 2) at least five times. Victim 2 told Witness 1 that he tried to tell her about it at the time. Witness 1 informed Ofc. Kaiser that she recalled Victim 2 telling her, but she did not believe him at the time.

Detective Erik Lopez arranged for forensic interviews of Victim 1 and Victim 2. On January 22, 2025, Victim 1 was interviewed by a trained forensic interviewer. During the interview Victim 1 stated that Miller had touched her “no no square” (her vagina) under her clothes.

On the same date, Victim 2 was interviewed by the same trained forensic interviewer. During the interview, Victim 2 stated that Miller had climbed on top of him while Victim 2 was in his bed, held him down and pulled Victim 2’s pants down and touched his penis. Victim 2 stated that Miller was “beating his meat” and then Miller tried to “beat” Victim 2’s meat. Victim 2 identified “meat” as his penis. Victim 2 also stated that Miller tried to put his penis in Victim 2’s butt. Victim 2 stated that this happened while they were living in the blue trailer in Blue Earth County.

Detective Lopez then met with Witness 3. Witness 3 stated that Miller had come over to his residence one day and was talking about how he had taught Victim 2 to masturbate. Miller explained to Witness 3 that he was watching Victim 1 and Victim 2 in the old trailer and that he was masturbating in the bathroom when Victim 1 and Victim 2 came into the bathroom. Miller stated that Victim 1 left quickly but that Victim 2 stayed in the bathroom and that he taught Victim 2 how to masturbate.

## 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**

Craig Frericks  
Commander  
710 S Front St  
Mankato, MN 56001-3803  
Badge: 3102

Electronically Signed:  
06/04/2025 08:16 AM  
Blue Earth County, Minnesota

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

**Prosecuting Attorney**

Michael Hanson  
Assistant County Attorney  
401 Carver Road  
PO Box 3129  
Mankato, MN 56002  
(507) 304-4600

Electronically Signed:  
06/03/2025 04:35 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 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: June 4, 2025.

**Judicial Officer**

Mark Betters  
District Court Judge

Electronically Signed: 06/04/2025 09:10 AM

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

COUNTY OF BLUE EARTH  
STATE OF MINNESOTA

**State of Minnesota**

Plaintiff

vs.

**Taylor James Miller**

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: