

State of Minnesota  
County of Goodhue

District Court  
1st Judicial District

Prosecutor File No. 681  
Court File No. 25-CR-22-869

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**State of Minnesota,**  
Plaintiff,

**COMPLAINT**  
Warrant

vs.

**JENNIFER LYNN MATTER DOB: 03/09/1972**

34359 Co. 2 Blvd  
Red Wing, MN 55066

Defendant.

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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: Second Degree Murder -With Intent-Not Premeditated**

Minnesota Statute: 609.19.1(1), with reference to: 609.19.1(1)

Maximum Sentence: 40 years in prison

Offense Level: Felony

Offense Date (on or about): 12/01/2003 to 12/31/2003

Control #(ICR#): 03019341

Charge Description: That during the month of December 2003, within the County of Goodhue, State of Minnesota, that the defendant did cause the death of a human being with intent to effect the death of that person or another, but without premeditation. To wit: that the defendant intentionally caused the death of an infant male, born December 2003, without premeditation, by giving birth to a live child and then abandoning said child on an isolated beach shortly after birth, without care, food, clothing, or protection in winter conditions.

**COUNT II**

**Charge: Second Degree Murder- Without Intent**

Minnesota Statute: 609.19.2, with reference to: 609.19.2(1)

Maximum Sentence: Imprisonment for Not More Than 40 Years

Offense Level: Felony

Offense Date (on or about): 12/01/2003 to 12/31/2003

Control #(ICR#): 03019341

Charge Description: That during the month of December 2003, within the County of Goodhue, State of Minnesota, that the defendant did cause the death of a human being, without intent to effect the death of any person, while committing or attempting to commit a felony offense other than criminal sexual conduct in the first or second degree with force or violence or a drive-by shooting. To wit: that the defendant

caused the death of an infant male, born December 2003, without intent, by committing or attempting to commit the felony offense of Neglect or Endangerment of a Child by intentionally or recklessly causing and/or permitting the child to be placed in a situation likely to substantially harm the child's physical, mental, or emotional health or cause the child's death. Said child was born alive and shortly after the birth the defendant placed the child in a situation likely to cause the child's death by abandoning the infant on an isolated beach without care, food, clothing, or protection in winter conditions.

## STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

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On November 4, 1999, at approximately 1:13 p.m., officers from the Goodhue County Sheriff's Office and Red Wing Police Department were dispatched to the small boat harbor, located on Levee Road along the Mississippi River in the City of Red Wing, Goodhue County, State of Minnesota in response to a report of a deceased infant found floating in the river near the boathouses. One witness at the scene reported that he was in his boat and saw something floating in the river by the boathouses near the shoreline and wanted to figure out what it was. The witness reported that he got closer and saw that it was a white towel. Thinking that it was a towel from his boat, he reached out, picked it up, and an infant child fell out of it. In response the male dropped the towel into the water and then directed the infant's body towards the shore before calling 911. Responding officers observed that the child appeared to be a newborn with the umbilical cord still attached.

An autopsy of the infant female child was conducted at the Minnesota Regional Coroner's Office by Dr. Lindsey Thomas, M.D. A report, dated November 11, 1999, concluded that the infant was a well-developed term female with no congenital abnormalities or obvious injuries. The report further documented that all internal organs and cavities showed change of early decomposition. Finally, the coroner determined that the manner of death was homicide and that the cause of death was undetermined.

On December 7th, 2003, at approximately 12:52 p.m., officers from the Goodhue County Sheriff's Department were dispatched to Methodist Beach, located along the shoreline of the Mississippi River, located in Florence Township, Goodhue County, State of Minnesota, in response to a report of a deceased, unclothed, infant male found on the beach. Upon arriving the responding officers learned that a group of four teenage girls had discovered the baby while driving through the parking lot of the beach area. The unclothed infant male was lying on the water's edge with his umbilical cord attached and wrapped around the middle of his body.

On December 8, 2003, an autopsy of the infant male child was conducted at the Minnesota Regional Coroner's Office by Dr. Lindsey C. Thomas MD. The autopsy documented that the infant was a full term newborn male infant who was probably born alive. Additional findings noted blunt force head injuries, possibly due to the birth process, including multiple small areas of subgaleal hemorrhage, scant left subdural hemorrhage, and intraparenchymal cerebral hemorrhage. No congenital anomalies were noted and there were early decomposition changes. The coroner determined that the manner of death was homicide and that the cause of death was undetermined.

From 1999 to present day, law enforcement officers followed up on countless investigative leads related to both infants. The investigation included DNA comparisons completed by the FBI (2004) and the Minnesota BCA (2007) that concluded that the 1999 and 2003 infants were related. In September 2020, Investigator Jon Huneke of the Goodhue County Sheriff's Department was assigned to investigate the cold cases. Investigative leads related to genetic genealogy directed officers to two persons of interest who could possibly related to the 1999 infant. On June 30, 2021, the Minnesota BCA Crime Lab compared DNA samples and was able to identify the biological father of the 1999 infant female (identified as Adult Male, dob 08/18/1975). Officers continued to follow up on investigative leads and determined that Jennifer Lynn Matter, dob 03/09/1972, the defendant herein, was a person of interest.

On April 25, 2022, Investigator Jon Huneke and Special Agent Brittany Carstensen of the Minnesota BCA went to the residence of the defendant and conducted an interview. The entire interview was recorded.

Matter agreed to speak with the officers and invited them inside the residence. During the approximately one hour interview, Jennifer Matter was questioned about her knowledge about the 1999 deceased infant. Matter denied being the mother of the deceased child and also denied being pregnant during that time frame. Officers asked Jennifer Matter for a voluntary DNA sample and she declined. On May 1, 2022, Investigator Jon Huneke applied for and received a search warrant for a sample of DNA from Jennifer Lynn Matter, dob 03/09/1972.

On May 2, 2022, Investigator Huneke and Special Agent Carstensen executed the search warrant and collected a DNA sample from Jennifer Lynn Matter, dob 03/09/1972. The officers again attempted to speak with Matter about the two infants. Matter again denied knowing anything about the deceased infants.

The known DNA sample of the defendant was submitted to the Minnesota BCA for analysis and then compared with the DNA results of those of the 1999 infant female. The results stated in part that: "Based upon the above results, the most conservative estimate indicates that the genetic results obtained from the unidentified female infant are 600 million times more likely to occur in a biological mother of the infant than in someone unrelated to the infant. This is very strong evidence to support the biological relationship between Jennifer Lynn Matter and the unidentified female infant as being a biological mother-child relationship. ...". Forensic scientists also conducted a kinship analysis using the nuclear DNA results to determine biological parents-offspring relationship between the defendant and Adult Male, dob 08/18/1975, and determined that "... the genetic results obtained from the unidentified female infant are 170 quintillion times more likely to occur in the biological mother and biological father of the infant than individuals unrelated to the infant."

The known DNA profile of Jennifer Lynn Matter, dob 03/09/1972, was also compared against the nuclear DNA results from the unidentified male infant (2003 baby). The results stated in part that "... the genetic results obtained from the unidentified male infant are 8.3 million times more likely to occur in a biological child of Jennifer Lynn Matter than in someone unrelated to Jennifer Lynn Matter."

On May 5, 2022, at approximately 2:46 p.m., Investigator Huneke and Special Agent Carstensen interviewed Jennifer Lynn Matter, dob 03/09/1972, the defendant herein, at her residence. The officers were invited inside and confirmed that she is under no obligation to talk to them. When asked to explain what was going on in her life in 1999, she said that she was in a bad mental state. She stated that she was in and out of jail, drinking too much, doing a lot of stupid things, and had experienced chaotic life circumstances for a long time. She stated that she was not aware that she was pregnant and that when she was on her way to drop off her kids (age 2 and 5) at school and daycare, that she started bleeding.

Matter stated that after dropping off the kids that she returned to her home in Red Wing, Minnesota, and gave birth in the bathroom. Matter stated that the baby was born blue, was not breathing, and was not crying so she freaked out. Matter stated that she knows that she should have gotten help but that her mind was not there. Matter stated that she was scared and wrapped the baby in a towel while trying to figure out what to do. Matter estimated about one day passed but was not sure as she was drinking heavily. She stated that she never told anyone what happened. Matter stated that she drove the baby to Bay Point Park in the middle of the night, put her in the water near the boathouses, and walked away. Matter stated that a few days later that she heard that the baby had been found.

During the interview officers asked Matter to tell them about the second baby. Initially Matter stated that she did not remember a second baby. Later on in the interview, Matter spontaneously stated "it was in Frontenac" (Goodhue County, Minnesota). She explained that she was "almost positive" that she was at the public beach by herself when she went into labor. Matter stated that at that time she was living in Red Wing, Minnesota, and that she went to the beach to be alone because she was trying to lay low because she had an arrest warrant and believed cops were looking for her. Matter stated that she did not remember if she

wrapped the second baby up in a towel or a blanket. Matter stated that it was dark outside, it was cold, that she did not look to see the gender of the child, and that she remembered leaving the baby on the beach before driving away. Matter later told SA Carstensen the baby was breathing fine and it may have been crying but she didn't remember it. Matter stated that she did not call 911 but hoped that someone in the nearby houses would find the baby. Matter said she felt the 2003 infant moving a little bit while it was inside of her stomach. Matter did not tell anyone about the 2003 baby as that was not really something someone would want to talk about. Matter said she did not think of or plan to leave the baby somewhere safe after it was born and that she didn't think she knew what she was going to do. Matter stated she did not go to Frontenac knowing she was in labor. Matter stated that during the pregnancy that she never intended to keep the baby, that she did not receive any prenatal care, and that she considered other options like adoption but had no plans to leave him somewhere safe after the birth.

## 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**

Jonathan Huneke  
Investigator  
430 W 6th Street  
Red Wing, MN 55066  
Badge: 173

Electronically Signed:  
05/06/2022 03:53 PM  
Goodhue County, Minnesota

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

**Prosecuting Attorney**

Stephen F. O'Keefe  
Assistant Goodhue County  
Attorney II  
454 West Sixth Street  
Red Wing, MN 55066  
(651) 267-4950

Electronically Signed:  
05/06/2022 03:49 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: May 6, 2022.

**Judicial Officer**

Douglas Bayley  
Judge

Electronically Signed: 05/06/2022 04:02 PM

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

**COUNTY OF GOODHUE  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**Jennifer Lynn Matter**

Defendant

*LAW ENFORCEMENT OFFICER RETURN OF SERVICE  
I hereby Certify and Return that I have served a copy of this Warrant  
upon the Defendant herein named.*

Signature of Authorized Service Agent:

## DEFENDANT FACT SHEET

**Name:** Jennifer Lynn Matter  
**DOB:** 03/09/1972  
**Address:** 34359 Co. 2 Blvd  
Red Wing, MN 55066

**Alias Names/DOB:**  
**SID:**  
**Height:**  
**Weight:**  
**Eye Color:**  
**Hair Color:**  
**Gender:** FEMALE  
**Race:**  
**Fingerprints Required per Statute:** Yes  
**Fingerprint match to Criminal History Record:** No  
**Driver's License #:** D024044477006 (MN)  
**Alcohol Concentration:**



## STATUTE AND OFFENSE GRID

<b>Cnt Nbr</b>	<b>Statute Type</b>	<b>Offense Date(s)</b>	<b>Statute Nbrs and Descriptions</b>	<b>Offense Level</b>	<b>MOC</b>	<b>GOC</b>	<b>Controlling Agencies</b>	<b>Case Numbers</b>
1	Charge	12/1/2003	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2004	N	MN0250000	03019341
	Penalty	12/1/2003	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2004	N	MN0250000	03019341
2	Charge	12/1/2003	609.19.2 Murder - 2nd Degree - Without Intent	Felony	H2004	N	MN0250000	03019341
	Penalty	12/1/2003	609.19.2(1) Murder - 2nd Degree - Without Intent - While Committing a Felony	Felony	H2004	N	MN0250000	03019341