

E-FILED 2023 AUG 31 12:15 PM PALO ALTO - CLERK OF DISTRICT COURT
 IN THE IOWA DISTRICT COURT IN AND FOR
 PALO ALTO COUNTY

This Complaint and Affidavit is to be:

- Filed with Court Clerk (cc: CA)
- Submitted to County Attorney
- Filed with JCO - Defendant is a Juvenile

Agency Form Number: 2023001980

Arrest Date: _____

THE STATE OF IOWA

VS.

OFFENDER

Last PRIEST		First HANNAH		Middle JOY		Suffix	
Address				City EMMETSBURG		State IA	Zip Code 50536
DL#	State IA	DL Class	DL Endorsements		DL Restrictions		
Date of Birth		Gender FEMALE	Race WHITE - W		Ethnicity UNKNOWN - U		
Height 5' 05"		Weight	Eye Color BROWN - BRO		Hair Color		

OFFENSE

State <input checked="" type="checkbox"/>	County <input type="checkbox"/>	Local <input type="checkbox"/>	Code Section 726.6(5)	Crime Description CHILD ENDANGERMENT - DEATH			Speed	in	Zone
Class FELB		Serious P.I. <input type="checkbox"/>	Fatal Accident <input type="checkbox"/>	Civil Damage Assessment <input type="checkbox"/>	Other <input type="checkbox"/>				
Location Type 20 - RESIDENCE/HOME									
Literal Description 8TH ST									
Address			City			State	Zip Code		
Is Date and Time of Incident Known? NO		Incident Date or Low Range 01/19/2023		Upper Date Range 01/19/2023	Incident Time or Low Range 12:30		Upper Time Range 13:30		

STATUS OF OFFENDER/JUVENILE

<input type="checkbox"/> TAKEN INTO CUSTODY	CUSTODY		<input type="checkbox"/> SUMMONS TO APPEAR (Citation Issued)
<input checked="" type="checkbox"/> WARRANT REQUESTED	<input type="checkbox"/> NO CONTACT ORDER REQUESTED	<input type="checkbox"/> RELEASED TO PARENT/GUARDIAN	

NARRATIVE

Narrative of Offense Committed

On or about the above stated date and time, the Defendant did being a person having custody or control over a child, intentionally use unreasonable force, torture or cruelty against S.J. a 23-month-old child.

VICTIM INFORMATION (Optionally displayed, especially if NCO is requested)

Last J.		First S.		Middle		Suffix	
Business/Organization/State/County/Municipality Name							
Address				City		State IA	Zip

AFFIDAVIT

STATE OF IOWA, PALO ALTO COUNTY

I, the undersigned, being duly sworn, state that all facts contained in this Complaint and Affidavit, known by me or told to me by other reliable persons form the basis for my belief that the defendant committed this crime

State all facts and persons relied upon supporting elements of alleged crime

On January 19, 2023, at approximately 1:30 PM, Hannah Priest found 23-month-old SJ unresponsive on his sleeping cot. Priest was SJ's daycare provider. On January 24, 2023, SJ was declared dead at Blank Children's Hospital. An autopsy was conducted at the Iowa Office of the State Medical Examiner. The autopsy determined that SJ died from brain trauma consistent with inflicted trauma. Over the course of three interviews, conducted on January 19, January 20, and May 16, 2023, Priest maintained that SJ was acting normal in all ways prior to her putting him down for a nap at approximately 12:30 PM. Priest denied that SJ had suffered any accidental head injuries while in her care that day and denied that any other kids struck SJ. Priest stated that her supervision of SJ and the other kids in her care was sufficient for her to be confident in that denial. During the May 16, 2023 interview, Priest admitted to being frustrated with SJ around nap-time because he had not yet gone to the bathroom that day. Priest stated that she set SJ into his cot by his shoulders and may not have known her own strength when doing so. Priest said SJ normally puts himself into the cot, as it only sits a few inches off the floor, and that she did set him into the cot out of frustration.

Matthew J. Burns


BURNS, MATT 1030

Signature of Complainant or Officer, Officer Name & Number

GENERAL PROBABLE CAUSE

Defendant Implicated 03 - ADMISSION/STATEMENTS, 09 - NEAR SCENE OF CRIME		
Operating Motor Vehicle in County	Other Physical Evidence	Attempted To Inflict Injury

STATE OF IOWA, PALO ALTO COUNTY

	Subscribed and sworn to before me by the person(s) signing the Complaint and Affidavit(s) on 08/31/2023	
	Notary Name LISA BEDDOW	Signature of Verifying Party <i>Lisa Beddow</i>
	Commission Number 120728	<input type="checkbox"/> Peace Officer <input checked="" type="checkbox"/> Notary <input type="checkbox"/> Prosecuting Attorney
	My Commission Expires 12/10/2025	