Filed in District Court State of Minnesota 10/23/2023

State of Minnesota County of Olmsted

District Court 3rd Judicial District

Prosecutor File No. Court File No. 55

0550075500 55-CR-23-7149

COMPLAINT

Order of Detention

vs.

State of Minnesota.

CONNOR FITZGERALD BOWMAN DOB: 03/21/1993

Defendant.

Plaintiff,

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: Murder - 2nd Degree - With Intent-Not Premeditated

Minnesota Statute: 609.19.1(1) Maximum Sentence: 40 years Offense Level: Felony

Offense Date (on or about): 08/01/2023 to 08/20/2023

Control #(ICR#): 23041616

Charge Description: On or between August 1, 2023 and August 20, 2023, in the County of Olmsted, Minnesota, Connor Fitzgerald Bowman did cause the death of another with intent to effect their death.

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Your complainant is a licensed peace officer employed by the Rochester Police Department. In that capacity your Complainant has reviewed the police reports relating to Connor Fitzgerald Bowman, the above-named defendant, and the allegations contained therein. Based upon that information, your complainant believes the following to be true and correct.

On August 21, 2023, the Southeast Minnesota Medical Examiner's Office alerted the Rochester Police Department to the suspicious death of Victim- an adult female fully identified in police reports. The Medical Examiner's Office had halted a cremation order for Victim after learning of possible suspicious circumstances. Victim died at the hospital on August 20, 2023.

Victim was admitted to a hospital in Rochester, Olmsted County, Minnesota, on August 16, 2023, with severe gastrointestinal distress and dehydration where her condition deteriorated rapidly.

The Medical Examiner's Office received a call from CGK- a female fully identified in police reports, who stated that Victim and her husband, CONNOR FITZGERALD BOWMAN (DOB 3/21/93) were having marital issues and were talking about a divorce following infidelity and a deteriorating relationship.

The Medical Examiner's Office noted that Victim's initial symptoms were similar to food poisoning and were treated as such. Victim did not respond to standard medical procedures and continued to deteriorate rapidly. Victim experienced cardiac issues, fluid in her lungs, and eventually organ failure. Victim was taken in for surgery to remove a portion of her colon after it was discovered it contained necrotic tissue.

While Victim was in the hospital, Bowman suggested that Victim was suffering from Hemophagocytic lymphohistiocytosis "HLH" which is a rare illness. Tests were done for HLH, but they were inconclusive. Bowman had told multiple people that Victim died from HLH. Bowman included HLH as Victim's cause of death in her obituary.

Bowman told the Medical Examiner's Office that Victim should be cremated immediately and argued that Victim's death was natural. Bowman attempted to cancel the autopsy, stating that Victim did not want to be a cadaver. Bowman was in email correspondence with one of the Death Investigators with the Medical Examiner's Office and asked the investigator if the toxicology analysis being completed would be more

Filed in District Court thorough than the analysis typically done at the hospital. Bowman also asked for a list of what was f Minnesota 10/23/2023 specifically going to be tested for.

SEL, an adult female identified in police reports, spoke with Det. Kendrick of the Rochester Police Department. SEL reported that she had received a text message from Victim on August 16, 2023, stating that Victim was very ill, went to the hospital, and things were going downhill. SEL reported Victim was a healthy person.

Bowman had attended pharmacy school, worked in poison control in Kansas, and was currently in medical school. Victim had told others that Bowman had debt, so they kept separate bank accounts. Bowman told SEL that he was going to get \$500,000 in life insurance as a result of Victim's death. Bowman also told SEL early on that Victim was suffering from HLH.

Det. Kendrick also spoke with SS, an adult male fully identified in police reports. SS stated that on August 14, 2023, Victim told him that she had a few days off work and was looking to spend some time with him. SS saw Victim on August 15 and the two texted each other that night. Victim reported that she was drinking at home with Bowman. The next morning, Victim messaged SS stating that she was sick and could not sleep at all, because she felt so ill. Victim reported that she thought it was a drink she had received that caused her illness because it was mixed in a large smoothie.

Det. Kendrick received a report that Bowman had accessed Victim's patient account through his hospital credentials. Det. Kendrick prepared a search warrant for the data related to Bowman's online activity and access of Victim's patient information. The data revealed that on August 16, Victim granted Bowman access to her protected health information, which expired when Victim died on August 20.

From August 16-20, Bowman checked Victim's electronic health record "EHR." Bowman looked at admission information, reviewed notes, medications, allergies, and an operating room log. From August 20-23, Bowman looked at Victim's EHR daily and on August 22 he modified Victim's EHR. Bowman created a documentation encounter but did not add anything. Because Bowman created a documentation, he was identified as part of Victim's care team which allowed him to enter the medical record without entering his credentials. From August 23-31, Bowman looked at Victim's EHR viewing images, medications, notes, and other encounters.

Det. Kendrick also obtained a search warrant at Bowman's residence to obtain his electronic devices. In the search, law enforcement seized a University of Kansas HP laptop. The university became aware that

On September 29, 2023, TK- a female fully identified in police reports, from the University of Kansas contacted Det. Kendrick because she had information that would be relevant to the case. Bowman had told the university he was a suspect in Victim's death. Bowman was a Poison Specialist, where he answered calls regarding poisons. TK stated that Bowman had devices from the University of Kansas to do this work. The devices had a VPN authentication process so that only he would be able to use the devices. Bowman worked in this role on August 5,6, and 10.

The University was able to locate internet searches conducted by Bowman on their device and network. TK stated that Bowman was researching colchicine. Colchicine is a drug used to treat gout. Bowman had not received any calls regarding colchicine, no other employee received calls regarding colchicine either.

Bowman also searched things like "internet browsing history: can it be used in court?" "Police track package delivery", and "delete amazon data police." These searches occurred on August 5, 2023. Later, on August 5, Bowman accessed a search for the corrected question from "bpn" to "vpn". VPNs are secure methods of web browsing and can be used by those who are trying to hide their online activity from law enforcement. Bowman was also searching sodium nitrate. Sodium nitrate can be used to limit oxygen transport through the body. There was then a Google shop page for various vendors selling sodium nitrate.

On August 10, Bowman searched "food v. industrial grade sodium nitrate." He then accessed a medical journal. The specific journal he accessed is what many medical professionals use to search information and the lethality of substances. Again, on August 10, Bowman was converting Victim's weight to kilograms and is multiplying it by 0.8. 0.8 mg/kg is considered the lethal dosage rate for colchicine.

The data also revealed a GoodRX website visit where Bowman searched for liquid colchicine. The search for liquid colchicine continued to August 11. There was also a Stripe.com visit around the time that the colchicine purchasing searches were being conducted. "Stripe" is a business that helps service online purchases. Gift cards can be purchased from that website. Det. Kendrick noticed in the data there were several links indicating background "stripe.com" and "m.stripe.network" which coincided with the online activity for purchasing colchicine. The dates and times for these site visits all coincided with a "user approved" two-factor authentication access.

Samples of blood and urine were taken from Victim and were sent to various testing agencies. The

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Minnesota Department of Health was one of those agencies. The Department of Health provided in Mathematical toxicology results which showed that colchicine was present in Victim's blood and urine. Samples of Victim's blood from her admission on August 16 were also tested in connection with the autopsy. Colchicine was detected in Victim's August 16 blood sample. Her medical records do not indicate that she was diagnosed with Gout, nor HLH. Victim she was not prescribed colchicine, nor was she given any in the hospital. The level of colchicine in Victim's blood on August 17 was 29 ng/mL, which was taken about 24 hours after Victim started exhibiting symptoms that brought her to the hospital. The Medical Examiner opined that 29 ng/mL is an elevated level of colchicine and remarked that the substance metabolizes quickly.

The Medical Examiner determined the cause of death of Victim to be toxic effects of colchicine and the manner of death to be homicide. Once this determination was made, Bowman was arrested on October 20, 2023. At that time, law enforcement also executed another search warrant on Bowman's residence. Officers located a receipt for a \$450,000 bank deposit inside.

PLEASE TAKE NOTICE: YOU MUST APPEAR FOR EVERY COURT HEARING REGARDING THIS CASE. FAILURE TO APPEAR FOR COURT IS A CRIMINAL OFFENSE AND MAY RESULT IN ADDITIONAL CRIMINAL CHARGES BEING IMPOSED AND PUNISHED AS PROVIDED IN MINNESOTA STATUTES SECTION 609.49. 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

Andrew Gagnon Police Officer 101 4th Street SE Rochester, MN 55904-3761 Badge: 2359 Electronically Signed: 10/23/2023 09:44 AM Olmsted County, agagnon

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

Prosecuting Attorney	Joseph K Rosholt	Electronically Signed:
	151 4th Street SE	10/23/2023 09:20 AM
HA	Government Center - 3rd Floor	
HU	Rochester, MN 55904	
	(507) 328-7600	



55-CR-23-7149 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

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				
X ORDER OF DETENTION					
Since the Defendant is already in custody, I order, subject to bail or conditions of releas detained pending further proceedings.	se, that the Defendant continue to be				
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: October 23, 2023.

Judicial Officer Lisa R Hayne

above-named court to answer this complaint.

Electronically Signed: 10/23/2023 10:18 AM

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

COUNTY OF OLMSTED STATE OF MINNESOTA	
State of Minnesota Plaintiff vs.	LAW ENFORCEMENT OFFICER RETURN OF SERVICE I hereby Certify and Return that I have served a copy of this Order of Detention upon the Defendant herein named.
Connor Fitzgerald Bowman Defendant	Signature of Authorized Service Agent:

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55-CR-23-7149 DEFENDANT FACT SHEET

Name:	Connor Fitzgerald Bowma	n
DOB:	03/21/1993	
Address:		
Alias Names/DOB:		
SID:	MN23EH7683	
Height:		
Weight:	190lbs.	
Eye Color:		
Hair Color:		
Gender:		
Race:		
Fingerprints Required per Statute:	Yes	
Fingerprint match to Criminal History Record:	Yes	
Driver's License #:	M000063785800 (MN)	
Alcohol Concentration:		

STATUTE AND OFFENSE GRID

Filed in District Court State of Minnesota 10/23/2023

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	МОС	GOC	Controlling Agencies	Case Numbers
1	Charge	8/1/2023	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2001		MN0550100	23041616