

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 26A02658
Court File No. 27-CR-26-6983

State of Minnesota,

COMPLAINT

Plaintiff,

Warrant

vs.

NAN ZHANG DOB: 03/08/1988

15717 57th PI N
Plymouth, MN 55446

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: Interfere with privacy - Against a minor under 18

Minnesota Statute: 609.746.1(g)(2), with reference to: 609.746.1(g)

Maximum Sentence: 2 YEARS AND/OR \$5,000

Offense Level: Felony

Offense Date (on or about): 11/04/2024

Control #(ICR#): 24042992

Charge Description: That on or about 11/4/2024, in Plymouth, Hennepin County, Minnesota, Nan Zhang, with intent to intrude upon or interfere with the privacy of an occupant, gazed, stared, or peeped in the window or other aperture of a sleeping room of a hotel, tanning booth, or other place where a reasonable person would have an expectation of privacy and exposed or was likely to expose their intimate parts or the clothing covering the immediate area of the intimate parts, and Victim B was a minor under the age of 18, and Nan Zhang knew or had reason to know the minor was present.

COUNT II

Charge: Harassment - Aggravated Violations - Victim under 18 years old - Actor at least 36 months older

Minnesota Statute: 609.749.3(a)(5), with reference to: 609.101.4, 609.749.3(a)

Maximum Sentence: 5 YEARS AND/OR \$10,000

Offense Level: Felony

Offense Date (on or about): 09/01/2024

Control #(ICR#): 24042992

Charge Description: That on or between September 1, 2023 and October 31, 2023, in Plymouth, Hennepin County, Minnesota, Nan Zhang followed, monitored or pursued another, whether in person or through any available technological or other means and it caused or would reasonably be expected to

have caused substantial emotional distress to Victim A, and Nan Zhang did so with the intent to kill, harass, or intimidate Victim A and Victim A was under the age of 18, and Nan Zhang was more than 36 months older than the victim.



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STATEMENT OF PROBABLE CAUSE

Complainant, a licensed peace officer with the Plymouth Police Department, has investigated the facts and circumstances of this offense and believes the following establishes probable cause:

Between the time of January 13, 2024 and September 24, 2025, the Plymouth Police Department received multiple reports of an adult male being located in the women's locker room at the Plymouth Ice Arena, which is located in Plymouth, Hennepin County, Minnesota. During the investigation, officers learned that incidents with this suspect dated back to 2023.

Officers spoke to a number of witnesses throughout the investigation but were not able to identify the suspect until September 2025.

Officers spoke to Victim A (date of birth 2/25/07) who reported that sometime around September or October 2023, she was changing in the women's locker room and a male walked into the locker room while she was in her bra and undershorts. Victim A described the male as an Asian male who matched the description of the suspect who was later caught on surveillance video multiple times.

Officers also spoke to Victim B (date of birth 8/2/08) who reported that on November 4, 2024, she left the ice and returned to the locker room. Victim B stated that she observed the male in question behind the shower wall, which separates the locker room from the shower. According to Victim B, the male advised her that he was there to fix the shower handle but would return at a later date. The male then left in a hurry. Victim B described the male as Asian, tall and skinny, wearing a hat and glasses. The description matches the suspect seen on surveillance video.

Officers took another report on September 24, 2025, after the suspect returned to the ice arena again. At that time, the defendant was stopped and trespassed. He was identified as NAN ZHANG (date of birth 3/8/88), the defendant herein.

A search warrant was executed and electronic devices belonging to the defendant were seized. Those devices were searched and while no videos were found of the locker room in question, three pornographic videos involving locker rooms were found.

Police reports show that a suspect matching the defendant was at the Plymouth Ice Arena on 01/03/2024, 11/04/2024, 11/05/2024, 03/06/2025 and 09/24/2025. Multiple times the defendant either entered or attempted to enter the women's locker room. He was captured on video multiple times and Complainant could visually identify that person as the defendant. None of the videos showed the defendant enter with a child who was there to play hockey, and he had no reason to be in any locker room, especially the women's locker room.

The defendant is not currently in custody. Due to the number of incidents over a long period of time, the State requests a warrant.

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

Amy Goodwin
Detective
3400 Plymouth Blvd
Plymouth, MN 55447-1482
Badge: 87

Electronically Signed:
03/20/2026 01:00 PM
Hennepin County, Minnesota

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

Prosecuting Attorney

Dan Allard
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
03/20/2026 10:38 AM

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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: \$50,000.00

Conditions of Release: No Contact with Address; No Contact with Victim

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: March 20, 2026.

Judicial Officer

Michael K. Browne
District Court Judge

Electronically Signed: 03/20/2026 01:07 PM

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

**COUNTY OF HENNEPIN
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Nan Zhang

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: Nan Zhang
DOB: 03/08/1988
Address: 15717 57th PI N
 Plymouth, MN 55446

Alias Names/DOB:

SID:

Height:

Weight:

Eye Color:

Hair Color:

Gender:

Race:

Fingerprints Required per Statute:

Fingerprint match to Criminal History Record:

Driver's License #:

SILS Person ID #:

SILS Tracking No.

Alcohol Concentration:

MALE

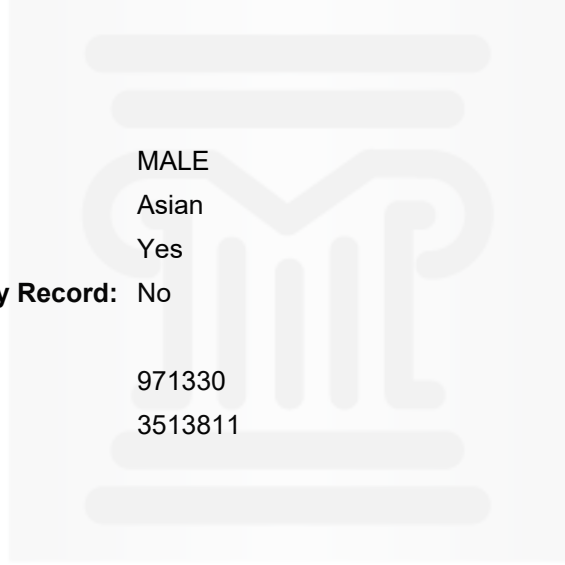
Asian

Yes

No

971330

3513811



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STATUTE AND OFFENSE GRID

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	11/4/2024	609.746.1(g)(2) Interfere with privacy - Against a minor under 18	Felony	N108C		MN0271700	24042992
	Penalty	11/4/2024	609.746.1(g) Interfere with privacy – Felony - Previous conviction/Previous conviction against a minor under 18	Felony	N108C		MN0271700	24042992
2	Charge	9/1/2024	609.749.3(a)(5) Harassment - Aggravated Violations - Victim under 18 years old - Actor at least 36 months older	Felony	N131C		MN0271700	24042992
	Penalty	9/1/2024	609.749.3(a) Harassment - Aggravated Violations - Penalty	Felony	N131C		MN0271700	24042992
	Definition	9/1/2024	609.101.4 Minimum Fines-Other	No-Level	N131C		MN0271700	24042992



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