

State of Minnesota
County of OlmstedDistrict Court
3rd Judicial District

Prosecutor File No.	10.GW56.0050
Court File No.	55-CR-25-7998

State of Minnesota,

Plaintiff,

COMPLAINT

Summons

vs.

MATTHEW KENNETH LONG DOB: 11/13/1979301 SE Market Street
Brownsdale, MN 55918

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: Attempted Theft by Swindle**

Minnesota Statute: 609.52.2(a)(4), with reference to: 609.17.1, 609.52.3(1), 609.17.4(2)

Maximum Sentence: Imprisonment for not more than ten years, or to payment of a fine of not more than \$50,000, or both

Offense Level: Felony

Offense Date (on or about): 08/07/2023 to 08/10/2023

Control #(ICR#): 00921451

Charge Description: On or about August 7, 2023, to August 10, 2023, in Olmsted County, Minnesota, the defendant, Matthew Kenneth Long, did attempt to intentionally engage in a swindle to obtain more than \$35,000 in unearned payments to be paid by Olmsted County, through artifice or scheme.

COUNT II**Charge: Commercial Bribery**

Minnesota Statute: 609.86.2(1), with reference to: 609.86.3(1)

Maximum Sentence: Imprisonment for not more than five years, or to payment of a fine of not more than \$10,000, or both

Offense Level: Felony

Offense Date (on or about): 08/07/2023 to 08/10/2023

Control #(ICR#): 00921451

Charge Description: On or about August 7, 2023, to August 10, 2023, in Olmsted County, Minnesota, the defendant, Matthew Kenneth Long, corruptly offered, gave, or agreed to give, directly or indirectly, any benefit, consideration, compensation, or reward to any employee, agent, or fiduciary, valued at more than \$500, with the intent to influence the person's performance of the duties as an employee, agent, or fiduciary in relation to his employer's or principal's business.

COUNT III**Charge: Attempted Bid Rigging**

Minnesota Statute: 325D.53.1(2), with reference to: 325D.56.2, 609.17.1, 609.17.4(2)

Maximum Sentence: Imprisonment for not more than three years and six months, or to payment of a fine of not more than \$25,000, or both

Offense Level: Felony

Offense Date (on or about): 08/07/2023 to 08/10/2023

Control #(ICR#): 00921451

Charge Description: On or about August 7, 2023, to August 10, 2023, in Olmsted County, Minnesota, the defendant, Matthew Kenneth Long, did unlawfully and intentionally attempt to engage in price fixing or bid rigging by controlling or fixing bids in the letting of a public contract.

Your Complainant, Brad Green, states as follows:

I am an Investigator with the Olmsted County Sheriff's Office, and I am a licensed peace officer in the State of Minnesota. As part of my duties, I investigate violations of Minnesota law, including criminal offenses in violation of Minnesota Statutes chapter 609 and other financial crimes.

I base this complaint on my personal knowledge, as well as information I have received from other law enforcement personnel and persons with knowledge of relevant facts, including, but not limited to: witness interviews, recordings, business records, and other records and evidence. I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe Matthew Kenneth Long (DOB 11/13/1971) ("Defendant"), committed the offenses alleged in this Complaint.

On or about August 4, 2023, the Olmsted County Waste-to-Energy Facility (the "County") issued a Request for Bids to repair a TG-1 turbine. The Olmsted County Waste-to-Energy Facility is owned and operated by Olmsted County. As part of the bidding process, Defendant (in his capacity as Manager of AAA Machining and Millwrights LLC (a registered Minnesota business)) and Z.Y. (a Program Manager and representative from a competing company owned by S.C. ("Competitor")), attended a pre-bid meeting at the County on August 7, 2023. Defendant had previously performed work on the turbine that needed repair.

On August 9, 2023, I received a report concerning suspected fraudulent activity by Defendant. During an interview with S.C. on the same date, S.C. reported that S.C.'s company and Defendant had recently submitted bids to repair a turbine for the County. S.C. stated that Defendant had attempted to influence an employee of S.C.'s company to bid higher than Defendant and that Defendant had offered to pay the employee in cash if Defendant won the bid. S.C. explained that Defendant had been the last person to work on the turbine that needed repair.

During an interview with Z.Y. on August 15, 2023, Z.Y. reported that Z.Y. and Defendant spoke over the phone following the pre-bid meeting on August 7, 2023. Z.Y. stated that Defendant claimed to "have an idea" but that the idea would have to stay "off the record." Defendant stated that if Z.Y. submitted a bid for the job on behalf of Competitor at \$300,000 and Defendant bid \$250,000, the County would award the contract to Defendant, but Defendant offered to bring Z.Y. \$25,000 cash for making the higher bid. Z.Y. reported that Z.Y. told Defendant that Z.Y. did not have the authority to conduct such negotiations but that Z.Y. would relay that information to his supervisors at Competitor.

In another interview on August 15, 2023, Competitor's Vice President of Project Management, C.T., reported that C.T. called Defendant later on August 7, 2023, and C.T. recorded the conversation. During the recorded call, Defendant told C.T., among other things, "they're going to give me the work either way," and the County was just putting out the bid to make sure that Defendant was not "ripping them off." Defendant also stated that the County had tried to "lowball" Defendant. Defendant added, "if you guys come in at like over \$300,000, it will let me bring mine up from \$200,000 to like \$275,000, and I'll split the difference with you guys. So you work with me, and I'll work with you, and I'll just hand you guys cash. Off the record. You guys can call it a bonus for the company or something." After continued discussion about the potential bids, C.T. responded, "I like it." Defendant then told C.T. that Defendant and C.T. would talk again on Wednesday, August 9, 2023, before either submitted their bids to "make sure we are on the same page." Defendant repeated again that the conversation was "off the record," and added, "We can't talk about it with customers or anything like that."

In a second recorded call on August 9, 2023, Defendant and C.T. continued to discuss rigging the bidding

process so that Defendant would be awarded the work at a price above the competitive bidding level. Defendant told C.T. "I'll shoot some cash your guys's way to make up the difference." Defendant emphasized that the arrangement was "all off the record" and stated, "We won't talk about it except for on a personal phone call. All right? . . . Because of government contracts you've got to be real careful."

While Defendant initially indicated he would bid \$250,000, he ultimately submitted a bid of \$174,500 to the County on August 10, 2023. Per Minnesota Statutes sections 471.345 and 574.26 and County policy, a bid for contract at or above \$175,000 would trigger a requirement to obtain a bond for the work. Competitor submitted a lower bid of \$131,684, on August 10, 2023. These were the only two bids submitted. Had C.T. submitted an inflated bid on behalf of Competitor as discussed, Defendant would have secured the contract at a price significantly higher than the low bid. The County would therefore have paid a higher price for the contract than it would have in a competitive environment.

During his interview, Z.Y. reported that Z.Y. had taken screenshots of text messages sent by Defendant on the evening of Thursday, August 10, 2023. The text messages from Defendant to Z.Y. included the following:

- "[C.T.] lied to me about bid price."
- "Said he would work with me then way under bid the costs."
- "Good luck making any profits on this job."
- "Told me 295k"
- "Actually bid 130k"
- "You guys could have made easy money instead of losing it."
- "I bid 175k"
- "Actual cost was around 140k"
- "I was going to give you guys 20k off [sic] the difference"

Your Complainant interviewed Defendant on August 18, 2025. Defendant denied asking Z.Y. or C.T. to inflate their bids, stating, "No, that's crookedness and I would never even dream of doing that."

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

Bradley Green
Detective
101 4th Street SE
Rochester, MN 55904-3718
Badge: 1670

Electronically Signed:
10/15/2025 01:20 PM
Olmsted County, Minnesota

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

Prosecuting Attorney

James Austad
445 Minnesota Street
Suite 1400
St. Paul, MN 55101
(651) 296-3353

Electronically Signed:
10/15/2025 12:19 PM

55-CR-25-7998
FINDING OF PROBABLE CAUSE

Filed in District Court
State of Minnesota
10/16/2025

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: October 16, 2025.

Judicial Officer

Christa M. Daily
judge

Electronically Signed: 10/16/2025 02:28 PM

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

**COUNTY OF OLMSTED
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Matthew Kenneth Long

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:

55-CR-25-7998
DEFENDANT FACT SHEET

*Filed in District Court
State of Minnesota
10/16/2025*

Name: Matthew Kenneth Long
DOB: 11/13/1979
Address: 301 SE Market Street
Brownsdale, MN 55918

Alias Names/DOB:

SID:

Height:

Weight:

Eye Color:

Hair Color:

Gender:

Race:

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: No

Driver's License #:

Case Scheduling Information: AGO prosecution - Please notify AGO of first appearance date.

Alcohol Concentration:

55-CR-25-7998
STATUTE AND OFFENSE GRID

Filed in District Court
 State of Minnesota
 10/16/2025

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	8/7/2023	609.52.2(a)(4) Theft-By Swindle	Felony			MN0550000	00921451
	Modifier	8/7/2023	609.17.1 Anticipatory Crimes-Attempts	No-Level			MN0550000	00921451
	Penalty	8/7/2023	609.52.3(1) Theft - Firearm or property value over \$35,000	Felony			MN0550000	00921451
	Penalty	8/7/2023	609.17.4(2) Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended	Felony			MN0550000	00921451
2	Charge	8/7/2023	609.86.2(1) Commercial Bribery/Corruptly Offers, Gives, or Agrees to Give	Felony			MN0550000	00921451
	Penalty	8/7/2023	609.86.3(1) Commercial Bribery-Value More Than \$500	Felony			MN0550000	00921451
3	Charge	8/7/2023	325D.53.1(2) Restraint Of Trade - ConspiracyBetweenTwo/MorePersons/ BidFixed-Restrain ct-fix/control bid	Felony			MN0550000	00921451
	Penalty	8/7/2023	325D.56.2 Restraint Of Trade - Penalties/WillfullyCommitted-325D.53	Felony			MN0550000	00921451
	Modifier	8/7/2023	609.17.1 Anticipatory Crimes-Attempts	No-Level			MN0550000	00921451
	Penalty	8/7/2023	609.17.4(2) Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended	Felony			MN0550000	00921451