IN THE IOWA DISTRICT COURT IN AND FOR
CERRO GORDO 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 Case Number: 2018027811
Arrest Date: _____

THE STATE OF IOWA

VS.

OFFENDER

Last	First	Middle	Suffix
GRAY	CHELSIE	JO	

Address	City	State	Zip Code
1351 RIDGEWAY AVENUE	LAWLER	IA	52154

DL#	State	DL Class	DL Endorsements	DL Restrictions
	IA	C		

Date of Birth	Gender	Race	Ethnicity
11/03/1988	FEMALE	WHITE - W	

Height	Weight	Eye Color	Hair Color
5' 05"	120 LBS	GREEN - GRN	BLONDE OR STRAWBERRY - BLN

OFFENSE

State ☒	County ☐	Local ☐	Code Section	Crime Description	Speed	in Zone
			720.2	PERJURY		

Class	Serious P.I.	Fatal Accident	Civil Damage Assessment	Other
FELD	☐	☐	☐	☐

Location Type
11 - GOVERNMENT/PUBLIC BUILDING

Literal Description
US 65/N WASHINGTON AVE

Address	City	State	Zip Code
220 NORTH WASHINGTON	MASON CITY	IA	50401

Is Date and Time of Incident Known?	Incident Date or Low Range	Upper Date Range	Incident Time or Low Range	Upper Time Range
YES	12/13/2017		09:00	

STATUS OF OFFENDER/JUVENILE

☐ TAKEN INTO CUSTODY	CUSTODY	☐ SUMMONS TO APPEAR (Citation Issued)
☒ WARRANT REQUESTED	☐ NO CONTACT ORDER REQUESTED	☐ RELEASED TO PARENT/GUARDIAN

NARRATIVE

Narrative of Offense Committed

On or about the above stated date and time, the Defendant did

commit perjury by knowingly making a false statement of material fact(s) or falsely denying knowledge of material facts while under oath or affirmation

AFFIDAVIT

STATE OF IOWA, CERRO GORDO 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

Chelsie Gray was employed as a Social Worker II Case Manager, with the Iowa Department of Human Services (DHS). As a Case Manager, Gray was responsible for setting up services for the child/family involved in the DHS removal, setting up Family Safety, Risk, and Permanency (FSRP) Services, setting case plan goals and setting up family meetings. As part of setting up services, Case Managers evaluate mental health & substance abuse issues in the children/family and help arrange any pertinent job or housing assistance. As part of their responsibilities, Case Managers are required by code to have a minimum face-to-face contact with the child/children once a month. On January 19th, 2017, Gray was assigned Case Manager responsibilities for the DHS removal of T.W., Z.W., I.W. & C.W., all minor children, from their biological parents. On December 13th, 2017, Gray testified, under oath, at a Termination of Parental Rights (TPR) Hearing, in Cerro Gordo County Court, regarding these children. During this hearing, Gray was asked what her recommendation would be regarding keeping the children in a concurrent home, even if a home was located for all four children, and Gray testified that she would recommend that the children stay where they are (i.e. in a concurrent home). Gray subsequently testified, under oath, on December 19th, 2017 that she had been working with a DHS adoption licensing worker throughout the case to try and find a home for all four children. On March 20th, 2018, the Court entered termination of parental rights orders on all four of the children. Documentation was obtained from the aforementioned DHS adoption licensing worker, confirming that Gray had been in communication regarding finding a different home for the children. During an interview with T.W., Z.W., & I.W.'s foster mother, it was discovered that Gray had called the foster mother and asked her to take all three of the male children as a permanent option for placement. During a subsequent interview with Gray, she stated that she had many conversations with other individuals involved in this case, about whether or not it was a good idea to keep all of the children in the same home or find separate homes for some of the children. When asked, during the interview, about what Gray would've communicated to the foster mother that would've been different than what was actually true, Gray stated, "Um, eventual placement."

Reger, Scott I168

Signature of Complainant or Officer, Officer Name & Number

GENERAL PROBABLE CAUSE

Defendant Implicated		
03 - ADMISSION/STATEMENTS, 07 - IDENTIFIED BY WITNESSES		
Operating Motor Vehicle in County	Other Physical Evidence	Attempted To Inflict Injury

STATE OF IOWA, CERRO GORDO COUNTY

NOTARIAL SEAL IOWA

Subscribed and sworn to before me by the person(s) signing the Complaint and Affidavit(s) on 04/08/2019

Notary Name **SHELLEY HERBST**

Commission Number **705752**

My Commission Expires **09/28/2021**

Signature of Verifying Party

☐ Peace Officer ☒ Notary ☐ Prosecuting Attorney