

CCT 1 LIST CHARGE STATUTE ONLY 617.247 MOC 01C31 GOC N CTY ATTY FILE NO. 10-4456 CONTROLLING AGENCY MN0270000 CONTROL NO 10003245

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COURT CASE NO. DATE FILED

if more than 6 counts (see attached)  if Domestic Assault as defined by MS 518B01, sub2a,b

State of Minnesota,

PLAINTIFF,

VS.

- Amended  Tab Charge Previously Filed
- SERIOUS FELONY  SUMMONS
- FELONY  WARRANT
- GROSS MISDM DWI  ORDER OF DETENTION
- GROSS MISDM  EXTRADITION

NAME: first, middle, last  
WILLIAM ALLAN JACOBS

Date of Birth 7/11/43 MNCIS #: 27-CR-LE#: 10-11164  
SILS ID: 672227  
TRACK ID: 2385978

DEFENDANT,

19175 RUTLEDGE RD  
DEEPHAVEN, MN 55391

COMPLAINT

The Complainant, being duly sworn, makes complaint to the above-named Court and states that there is probable cause to believe that the Defendant committed the following offense(s). The complainant states that the following facts establish PROBABLE CAUSE:

Complainant, Detective Nabil Gottwaldt of the Hennepin County Sheriff's Office, has investigated the facts and circumstances of this offense and believes the following establishes probable cause:

On January 21, 2010, detectives from the Hennepin County Sheriff's Office executed a search warrant at 19175 Rutledge Road in Deephaven, Hennepin County. This address belongs to WILLIAM ALLAN JACOBS, Defendant herein. During the execution of this warrant, detectives recovered multiple items, including four computers, six external hard drives, four thumb drives and 141 CDs/DVDs. This search warrant was part of a separate investigation involving allegations of criminal sexual conduct.

On January 22, 2010, Detective Dan Kirby of the Hennepin County Sheriff's Department conducted a preliminary examination of three CD/DVDs that had been recovered during the execution of the above-mentioned search warrant. A preliminary examination was done of one of the CD/DVDs, which was labeled "Deleted Files Photos." During his review, Detective Kirby located a file that was titled "Sex Paradies." Within that file, there are numerous photographs that are believed to be child pornography. Detective Kirby noted that four of those files, labeled b001tb.jpg, b002tb.jpg, b003tb.jpg and b004tb.jpg contained photos of four pre-pubescent boys who are completely unclothed and are engaged in sexual acts, including masturbating one another, kissing, oral sex and simulating anal intercourse.

Forensic Computer Examiner Tony Pollock was also asked to do a preliminary review of some of the above-mentioned items. During this examination, 40 CD/DVDs were randomly selected and reviewed. At this point, although further examination is pending, there have been approximately 39,133 images located that appear to be children under the age of 18 engaged in sexual acts with other children or adults. It should be noted that based on the hash values attributed to these files, approximately 701 of them matched a list of known pornography that was previously identified by the Wyoming Crimes Against Children database.

COMPLAINT SUPPLEMENT

CCT	SECTION/Subdivision	M.O.C.	GOC

OFFENSE

COUNT 1: POSSESSION OF PORNOGRAPHIC WORKS INVOLVING A MINOR (FELONY)  
 MINN. STAT. § 617.247, SUBD. 4(a)  
 PENALTY: 0-5 YEARS AND/OR \$5,000 PLUS A CONDITIONAL RELEASE TERM

That on or about January 21, 2010, in Deephaven, Hennepin County, Minnesota, **WILLIAM ALLAN JACOBS** knowingly possessed a computer storage system containing pornographic works involving a minor.

**NOTICE:** You must appear for every court hearing on this charge. A failure to appear for court on this charge is a criminal offense and may be punished as provided in Minn. Stat. § 609.49.

*THEREFORE, Complainant requests that said 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'S NAME:

COMPLAINANT'S SIGNATURE:

**Detective Nabil Gottwaldt**

*Being duly authorized to prosecute the offense(s) charged, I hereby approve this Complaint.*

DATE:

**January 25, 2010**

**red**

PROSECUTING ATTORNEY'S SIGNATURE:

**PROSECUTING ATTORNEY:**

NAME/TITLE:

**KRISTA L. BETTINGER (29066x)**  
Assistant County Attorney

ADDRESS/TELEPHONE:

**C2100 Government Center, Minneapolis, MN 55487**  
**Telephone: 612-348-8488**

Court Case # \_\_\_\_\_  
This COMPLAINT was subscribed and sworn to before the undersigned this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

NAME: \_\_\_\_\_ SIGNATURE: \_\_\_\_\_

TITLE: \_\_\_\_\_

**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 his detention, if already in custody, pending further proceedings. The Defendant(s) is/are thereof charged with the above-stated offense.*

**SUMMONS**

THEREFORE YOU, THE ABOVE-NAMED DEFENDANT(S), ARE HEREBY SUMMONED to appear on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ AM/PM before the above-named court at \_\_\_\_\_ to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

**WARRANT**

EXECUTE IN MINNESOTA ONLY

*To the sheriff of the above-named county; or other person authorized to execute this WARRANT; I hereby order, in the name of the State of Minnesota, that the above-named Defendant(s) be apprehended and arrested without delay and brought promptly before the above-named 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 thereafter as such Judge or Judicial Officer is available) to be dealt with according to law.*

**ORDER OF DETENTION**

Since the above-named Defendant(s) is already in custody; I hereby order, subject to bail or conditions of release, that the above-named Defendant(s) continue to be detained pending further proceedings.

Bail: \$100,000 + CR

Conditions of Release: \_\_\_\_\_

This COMPLAINT-  WARRANT  duly subscribed and sworn to, is issued by the undersigned Judicial Officer this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

NAME: \_\_\_\_\_ SIGNATURE \_\_\_\_\_

TITLE: **JUDGE OF DISTRICT COURT**

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

STATE OF MINNESOTA	COUNTY OF HENNEPIN
<b>STATE OF MINNESOTA</b>	
Plaintiff	
vs.	
<b>WILLIAM ALLAN JACOBS</b>	
Defendant.	

*Clerk's Signature or File Stamp:*

**RETURN OF SERVICE**

I hereby Certify and Return that I have served a copy of this COMPLAINT – SUMMONS, WARRANT, ORDER OF DETENTION upon Defendant(s) herein-named.

Signature of Authorized Service Agent: