

**State of Minnesota
County of Hennepin**

**District Court
Fourth Judicial District**

CCT	LIST CHARGE STATUTE ONLY	MOC	GOC	CTY ATTY	CONTROLLING	
1	609.342	L1174	N	FILE NO.	AGENCY	CONTROL NO
2	609.342	L1174	N	10-4453	MN0270000	10002421

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,

VS.

PLAINTIFF,

Amended Tab Charge Previously Filed

<input checked="" type="checkbox"/> SERIOUS FELONY	<input type="checkbox"/> SUMMONS
<input type="checkbox"/> FELONY	<input type="checkbox"/> WARRANT
<input type="checkbox"/> GROSS MISDM DWI	<input checked="" type="checkbox"/> ORDER OF DETENTION
<input type="checkbox"/> GROSS MISDM	<input type="checkbox"/> EXTRADITION

NAME: first, middle, last
WILLIAM ALLAN JACOBS

Date of Birth	MNCIS #:	27-CR-
7/11/43	LE#:	10-11031
	SILS ID:	672227
	TRACK ID:	2385417

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 17, 2010, a known fifteen-year-old boy hereinafter identified as Child A reported to his mother that **WILLIAM ALLAN JACOBS**, date of birth 7/11/43, the defendant named herein, had been sexually abusing him since he was approximately twelve years old. Child A was at all relevant times a resident of Hennepin County.

Child A reported that in the summer of 2007, he went on a camping trip with the defendant. The defendant put up a tent and slept inside the tent next to Child A. During the night, Child A was awakened by the defendant rubbing his chest from his pectorals down to the area of his pubic hair. Child A moved his hand away, but the defendant kept moving his hand back. Eventually, Child A more forcefully pushed defendant's hand away and the defendant stopped.

In fall of 2007, the defendant again arranged to take trips with Child A. Typically, the defendant would pick Child A up on either Friday evening or Saturday morning. They would then spend the day together doing various activities. In the evening, they might watch a movie. On multiple occasions, the defendant then showed Child A pornography on his computer. The defendant would then take Child A into defendant's bedroom to sleep. During the night, Child A would wake up and find the defendant touching his penis. The defendant would typically masturbate Child A to the point of ejaculation and then massage the semen onto Child A's chest. Child A estimated that these abusive episodes occurred approximately 28 times between fall of 2007 and spring of 2008.

The sexual abuse continued and escalated to penetration in the summer of 2008. On multiple occasions, the defendant touched Child A's penis and had Child A touch defendant's penis. On at least one occasion in approximately the summer of 2008, defendant was touching Child A's penis and then placed his mouth around it and

performed oral sex. The defendant then had Child A perform oral sex on him. The defendant also anally penetrated Child A on one occasion between the summer of 2008 and the spring of 2009. The anal penetration caused pain to Child A. These incidents of sexual abuse occurred at the defendant's home in Deephaven in Hennepin County.

The defendant also took Child A to his cabin up north on multiple occasions. On one occasion the defendant anally penetrated Child A during a visit to the cabin. Child A states that this happened between summer of 2008 and spring of 2009. The anal penetration caused pain to Child A.

The sexual abuse continued between the summer of 2009 until January, 2010. Most of these incidents involved the defendant touching Child A's penis and masturbating Child A until he ejaculated.

Child A provided a detailed written account of his abuse along with dates of weekends that he spent with the defendant. On January 21, 2010, Child A placed a monitored phone call to the defendant with the assistance of your complainant and other officers. Child A told the defendant of his fears that he may have contracted a sexually transmitted disease based upon the sexual things they had done together. The defendant reassured Child A that he was "clean" and did not have a sexually transmitted disease. Defendant never challenged Child A's statement that the sexual acts they had engaged in could have given him an STD and even inquired into whether or not Child A was symptomatic.

Your complainant and other officers executed a search warrant at the defendant's home. The Hennepin County Sheriff's Office's crime lab is collecting biological evidence from the defendant's home as well as his computer. Forensic analysis is pending.

During all of the events described herein, the defendant was entrusted as a caregiver and was in a position of authority over Child A.

The defendant is presently in custody.

COMPLAINT SUPPLEMENT

CCT	SECTION/Subdivision	M.O.C.	GOC

OFFENSE

COUNT 1: CRIMINAL SEXUAL CONDUCT IN THE FIRST DEGREE (FELONY)
 MINN. STAT. § 609.342, SUBD. 1(b), SUBD. 2; § 609.101, SUBD. 2; § 609.3455
 PENALTY: 0-30 YEARS AND/OR \$12,000-\$40,000 PLUS CONDITIONAL RELEASE

That on or between June 1, 2008 and January 17, 2010, in Hennepin County, Minnesota, **WILLIAM ALLAN JACOBS**, born 7/11/43, who was in a position of authority over the victim, Child A, engaged in sexual penetration with the victim, a person between the ages of thirteen and sixteen years at the time, and **WILLIAM ALLAN JACOBS** is more than forty-eight months older than the victim.

COUNT 2: CRIMINAL SEXUAL CONDUCT IN THE FIRST DEGREE (FELONY)
 MINN. STAT. § 609.342, SUBD. 1(b), SUBD. 2; § 609.101, SUBD. 2; § 609.3455
 PENALTY: 0-30 YEARS AND/OR \$12,000-\$40,000 PLUS CONDITIONAL RELEASE

That on or between June 1, 2008 and January 17, 2010, in Hennepin County, Minnesota, **WILLIAM ALLAN JACOBS**, born 7/11/43, who was in a position of authority over the victim, Child A, engaged in sexual penetration with the victim, a person between the ages of thirteen and sixteen years at the time, and **WILLIAM ALLAN JACOBS** is more than forty-eight months older than the victim.

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:

Detective Nabil Gottwaldt

COMPLAINANT'S SIGNATURE:

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

DATE:

January 22, 2010

red

PROSECUTING ATTORNEY'S SIGNATURE:

PROSECUTING ATTORNEY:

NAME/TITLE:

JUDITH A. JOHNSTON (150940)

Assistant County Attorney

ADDRESS/TELEPHONE:

C2100 Government Center, Minneapolis, MN 55487

Telephone: 612-348-4083

FORM I-2

Rev. 3/94

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: \$1,000,000 + CR

Conditions of Release: NO CONTACT WITH MINORS; NO POSSESSION OF FIREARMS; NO CONTACT WITH VICTIM OR VICTIM'S FAMILY; SURRENDER PASSPORT; NO TRAVEL OUT OF STATE WITHOUT COURT APPROVAL

This COMPLAINT - ORDER OF DETENTION 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

Clerk's Signature or File Stamp:

STATE OF MINNESOTA

Plaintiff

vs.

WILLIAM ALLAN JACOBS

Defendant.

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: