

State of Minnesota
County of Olmsted

District Court
3rd Judicial District

Prosecutor File No. 0550008245
Court File No. 55-CR-20-7301

State of Minnesota,

Plaintiff,

vs.

TYLER JACOB JONES DOB: 02/25/1998

1878 Restoration Rd SW
#A6
Rochester, MN 55902

Defendant.

COMPLAINT

Summons

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: Possess Pornographic Work Minor Under 13

Minnesota Statute: 617.247.4(b)

Maximum Sentence:

Offense Level: Felony

Offense Date (on or about): 11/11/2019 to 11/21/2019

Control #(ICR#): 20006321

Charge Description: On or about, between November 11, 2019 and November 21, 2019, in the County of Olmsted, Tyler Jacob Jones, did wrongfully and unlawfully possess pornographic work or a computer disk or computer or other electronic, magnetic, or optical storage system or a storage system of any other type, containing a pornographic work, knowing or with reason to know its content and character, and the violation involved a minor under the age of 13 years.

COUNT II

Charge: Possess Pornographic Work Minor Under 13r

Minnesota Statute: 617.247.4(b)

Maximum Sentence:

Offense Level: Felony

Offense Date (on or about): 11/11/2019 to 11/21/2019

Control #(ICR#): 20006321

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violation involved a minor under the age of 13 years.

COUNT III

Charge: Possess Pornographic Work Minor Under 13r

Minnesota Statute: 617.247.4(b)

Maximum Sentence:

Offense Level: Felony

Offense Date (on or about): 11/11/2019 to 11/21/2019

Control #(ICR#): 20006321

Charge Description: On or about, between November 11, 2019 and November 21, 2019, in the County of Olmsted, Tyler Jacob Jones, did wrongfully and unlawfully possess pornographic work or a computer disk or computer or other electronic, magnetic, or optical storage system or a storage system of any other type, containing a pornographic work, knowing or with reason to know its content and character, and the violation involved a minor under the age of 13 years.

COUNT IV

Charge: Possess Pornographic Work Minor Under 13

Minnesota Statute: 617.247.4(b)

Maximum Sentence:

Offense Level: Felony

Offense Date (on or about): 11/11/2019 to 11/21/2019

Control #(ICR#): 20006321

Charge Description: On or about, between November 11, 2019 and November 21, 2019, in the County of Olmsted, Tyler Jacob Jones, did wrongfully and unlawfully possess pornographic work or a computer disk or computer or other electronic, magnetic, or optical storage system or a storage system of any other type, containing a pornographic work, knowing or with reason to know its content and character, and the violation involved a minor under the age of 13 years.

COUNT V

Charge: Possess Pornographic Work Minor Under 13

Minnesota Statute: 617.247.4(b)

Maximum Sentence:

Offense Level: Felony

Offense Date (on or about): 11/11/2019 to 11/21/2019

Control #(ICR#): 20006321

Charge Description: On or about, between November 11, 2019 and November 21, 2019, in the County of Olmsted, Tyler Jacob Jones, did wrongfully and unlawfully possess pornographic work or a computer disk or computer or other electronic, magnetic, or optical storage system or a storage system of any other type, containing a pornographic work, knowing or with reason to know its content and character, and the violation involved a minor under the age of 13 years.

COUNT VI

Charge: Possess Pornographic Work-Computer Disk/Electronic/Magnetic/Optical Image w/Porn

Minnesota Statute: 617.247.4(a)

Maximum Sentence:

Offense Level: Felony

Offense Date (on or about): 11/11/2019 to 11/21/2019

Control #(ICR#): 20006321

Charge Description: On or about, between November 11, 2019 and November 21, 2019, in the County of Olmsted, Tyler Jacob Jones, did wrongfully and unlawfully possess pornographic work or a computer disk or computer or other electronic, magnetic, or optical storage system or a storage system of any other type, containing a pornographic work, knowing or with reason to know its content and character.

COUNT VII

Charge: Possess Pornographic Work-Computer Disk/Electronic/Magnetic/Optical Image w/Porn

Minnesota Statute: 617.247.4(a)

Maximum Sentence:

Offense Level: Felony

Offense Date (on or about): 11/11/2019 to 11/21/2019

Control #(ICR#): 20006321

Charge Description: On or about, between November 11, 2019 and November 21, 2019, in the County of Olmsted, Tyler Jacob Jones, did wrongfully and unlawfully possess pornographic work or a computer disk or computer or other electronic, magnetic, or optical storage system or a storage system of any other type, containing a pornographic work, knowing or with reason to know its content and character.

COUNT VIII

Charge: Possess Pornographic Work-Computer Disk/Electronic/Magnetic/Optical Image w/Porn

Minnesota Statute: 617.247.4(a)

Maximum Sentence:

Offense Level: Felony

Offense Date (on or about): 11/11/2019 to 11/21/2019

Control #(ICR#): 20006321

Charge Description: On or about, between November 11, 2019 and November 21, 2019, in the County of Olmsted, Tyler Jacob Jones, did wrongfully and unlawfully possess pornographic work or a computer disk or computer or other electronic, magnetic, or optical storage system or a storage system of any other type, containing a pornographic work, knowing or with reason to know its content and character.

COUNT IX

Charge: Possess Pornographic Work-Computer Disk/Electronic/Magnetic/Optical Image w/Porn

Minnesota Statute: 617.247.4(a)

Maximum Sentence:

Offense Level: Felony

Offense Date (on or about): 11/11/2019 to 11/21/2019

Control #(ICR#): 20006321

Charge Description: On or about, between November 11, 2019 and November 21, 2019, in the County of Olmsted, Tyler Jacob Jones, did wrongfully and unlawfully possess pornographic work or a computer disk or computer or other electronic, magnetic, or optical storage system or a storage system of any other type, containing a pornographic work, knowing or with reason to know its content and character.

COUNT X**Charge: Possess Pornographic Work-Computer Disk/Electronic/Magnetic/Optical Image w/Porn**

Minnesota Statute: 617.247.4(a)

Maximum Sentence:

Offense Level: Felony

Offense Date (on or about): 11/11/2019 to 11/21/2019

Control #(ICR#): 20006321

Charge Description: On or about, between November 11, 2019 and November 21, 2019, in the County of Olmsted, Tyler Jacob Jones, did wrongfully and unlawfully possess pornographic work or a computer disk or computer or other electronic, magnetic, or optical storage system or a storage system of any other type, containing a pornographic work, knowing or with reason to know its content and character.

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Your complainant is a licensed peace officer employed by the Rochester Police Department. In that capacity your Complainant has reviewed the police reports relating to Tyler Jacob Jones, the above-named defendant, and the allegations contained therein. Based upon that information, your complainant believes the following to be true and correct.

In February 2020, Inv. Novak of the Rochester Police Department received five Cybertips from Google of suspected child pornography. Google identified the email address that the images were uploaded to. The images and video were uploaded to a Google Drive account between November 11, 2019 and November 21, 2019. An administrative subpoena was sent to Charter Communications who identified the IP address as belonging to a residence in SW Rochester, MN, Olmsted County.

Inv. Novak learned that the residence that the IP address was registered belonged to an apartment building, but that each individual building had its own router with a different password for each building tenant to access. The building that this IP address registered to had six occupants during the time the images were uploaded. Google identified the device and model number of the device that the images were uploaded to as a Samsung Galaxy Note 4. T-Mobile provided information that the phone was listed to a Stanley Jones. Inv. Novak recalled that there was a "Tyler Jones" who resided at the apartment building. A records check showed Stanley as TYLER JACOB JONES (DOB 2/25/98) grandfather. Inv. Novak confirmed that Jones still resided at the apartment.

A search warrant was executed at the SW apartment residence. Three cell phones and a gaming system were recovered. The Samsung Galaxy Note 4 was not recovered. When Inv. Novak did an extraction on the Motorola Moto e6, he noted that the SIM card was for a T-Mobile phone and had the same IMEI number as the Samsung Galaxy Note 4 which was the original device that captured the suspected child pornography images.

Jones denied uploading images of child pornography to the Google Drive account.

The SIM card that was found in the Motorola Moto e6 phone, was the same SIM card that contained the reported suspected child pornography. The images and videos were:

1) an adult male performing sexual intercourse on an approximately 4-9 year old female

- 2) an adult male touching his genitals on an approximately 3-7 year old females genitals
- 3) an approximately 6-10 year old female lewdly exhibiting her anus and vagina
- 4) an approximately 3-6 year old female wearing only a shirt and lewdly exposing her vagina
- 5) an approximately 7-11 year old female lying down and lewdly exposing her vagina
- 6) an approximately 3-7 year old female performing oral sex on an adult male
- 7) a video of an approximately 2-4 year old female masturbating an adult male to the point of ejaculation
- 8) a video of an adult male performing sexual intercourse on an approximately 6-10 year old female
- 9) a video of an approximately 6-10 yea old female engaging in sexual intercourse with an adult male
- 10) an image of an adult male performing sexual intercourse on an approximately 3-7 year old female.

PLEASE TAKE NOTICE: YOU MUST APPEAR FOR EVERY COURT HEARING REGARDING THIS CASE. FAILURE TO APPEAR FOR COURT IS A CRIMINAL OFFENSE AND MAY RESULT IN ADDITIONAL CRIMINAL CHARGES BEING IMPOSED AND PUNISHED AS PROVIDED IN MINNESOTA STATUTES SECTION 609.49.

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

Todd Schwanke
Investigator
101 4th Street SE
Rochester, MN 55904-3761
Badge: 2303

Electronically Signed:
12/21/2020 10:36 AM
Olmsted County, Minnesota

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

Prosecuting Attorney

Arianna Whitney
151 4th Street SE
Government Center - 3rd Floor
Rochester, MN 55904
(507) 328-7600

Electronically Signed:
12/18/2020 10:27 AM

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 on **January 28, 2021 at 9:00 AM** before the above-named court at 151 Fourth Street SE, Rochester, MN 55904 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: December 21, 2020.

Judicial Officer

Jacob C Allen
Judge

Electronically Signed: 12/21/2020 01:27 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.

Tyler Jacob Jones

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:

DEFENDANT FACT SHEET

Name: Tyler Jacob Jones
DOB: 02/25/1998
Address: 1878 Restoration Rd SW
#A6
Rochester, MN 55902

Alias Names/DOB:

SID:

Height:

Weight: 0lbs.

Eye Color:

Hair Color:

Gender:

Race:

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: No

Driver's License #:

Alcohol Concentration:

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	11/11/2019	617.247.4(b) Possess Pornographic Work; Prior conviction; Registered predatory offender; Minor under 13	Felony	O1CC1		MN0550100	20006321
2	Charge	11/11/2019	617.247.4(b) Possess Pornographic Work; Prior conviction; Registered predatory offender; Minor under 13	Felony	O1CC1		MN0550100	20006321
3	Charge	11/11/2019	617.247.4(b) Possess Pornographic Work; Prior conviction; Registered predatory offender; Minor under 13	Felony	O1CC1		MN0550100	20006321
4	Charge	11/11/2019	617.247.4(b) Possess Pornographic Work; Prior conviction; Registered predatory offender; Minor under 13	Felony	O1CC1		MN0550100	20006321
5	Charge	11/11/2019	617.247.4(b) Possess Pornographic Work; Prior conviction; Registered predatory offender; Minor under 13	Felony	O1CC1		MN0550100	20006321
6	Charge	11/11/2019	617.247.4(a) Possess Pornographic Work-Computer Disk/Electronic/Magnetic/Optical Image w/Porn	Felony	O1C91		MN0550100	20006321
7	Charge	11/11/2019	617.247.4(a) Possess Pornographic Work-Computer Disk/Electronic/Magnetic/Optical Image w/Porn	Felony	O1C91		MN0550100	20006321
8	Charge	11/11/2019	617.247.4(a) Possess Pornographic Work-Computer Disk/Electronic/Magnetic/Optical Image w/Porn	Felony	O1C91		MN0550100	20006321
9	Charge	11/11/2019	617.247.4(a) Possess Pornographic Work-Computer Disk/Electronic/Magnetic/Optical Image w/Porn	Felony	O1C91		MN0550100	20006321
10	Charge	11/11/2019	617.247.4(a) Possess Pornographic Work-Computer Disk/Electronic/Magnetic/Optical Image w/Porn	Felony	O1C91		MN0550100	20006321