

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

NORMANN ROBERT PITTELKOW and
NICOLE RENEE JACOB,

Defendants.

INDICTMENT

_____/

The Grand Jury charges:

COUNT ONE

(Sexual Exploitation of a Child and Attempted Sexual Exploitation of a Child)

On or about September 3, 2012, in Calhoun County, in the Southern Division of the
Western District of Michigan,

NORMANN ROBERT PITTELKOW

knowingly employed, used, persuaded, induced, enticed, and coerced, and attempted to employ,
use, persuade, induce, entice, and coerce, a minor to engage in sexually explicit conduct for the
purpose of producing any visual depiction of such conduct, using materials that had been mailed,
shipped, and transported in and affecting interstate and foreign commerce by any means,
including by computer. Specifically, the defendant produced a video with the filename “dvd
handycam 052.mpg,” in which a child posed in a bedroom naked and in sexually suggestive and

revealing clothing at the defendant's direction. The video was produced using materials including, but not limited to, an HP Pavilion computer made outside the state of Michigan.

18 U.S.C. § 2251(a) and (e)

COUNT TWO

(Sexual Exploitation of a Child and Attempted Sexual Exploitation of a Child)

On or about September 3, 2012, in Calhoun County, in the Southern Division of the Western District of Michigan,

NORMANN ROBERT PITTELKOW

knowingly employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, one or more minors to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer. Specifically, the defendant produced a video with the filename “dvd handycam 056.mpg” of four children, between the ages of approximately three and twelve years old, naked in a bathroom. The video was produced using materials including, but not limited to, an HP Pavilion computer made outside the state of Michigan.

18 U.S.C. § 2251(a) and (e)

COUNT THREE

(Sexual Exploitation of a Child and Attempted Sexual Exploitation of a Child)

On or about October 15, 2013, in Calhoun County, in the Southern Division of the Western District of Michigan,

NORMANN ROBERT PITTELKOW

knowingly employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer. Specifically, the defendant produced a video with the filename “dvd handycam 108.mpg” that depicted the defendant using a video camera apparently to inspect marks all over the child’s naked body, including the pubic area, and touching the child. The video was produced using materials including, but not limited to, an HP Pavilion computer made outside the state of Michigan.

18 U.S.C. § 2251(a) and (e)

COUNT FOUR

(Sexual Exploitation of a Child and Attempted Sexual Exploitation of a Child)

In or about September 2015, in Calhoun County, in the Southern Division of the Western District of Michigan,

**NORMANN ROBERT PITTELKOW and
NICOLE RENEE JACOB**

knowingly employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, one or more minors to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer. Specifically, the defendants used materials including, but not limited to, a Samsung Galaxy cellular telephone manufactured outside the state of Michigan, to produce one or more of the following images, which include depictions of three children posing naked with NICOLE RENEE JACOB and lasciviously displaying their pubic areas to the camera:

1. 208_thumb.jpg;
2. 209_thumb.jpg;
3. 210_thumb.jpg;
4. 213_thumb.jpg;
5. 214_thumb.jpg;
6. 220_thumb.jpg;
7. 222_thumb.jpg;
8. 223_thumb.jpg;
9. 224_thumb.jpg; and
10. 226_thumb.jpg.

18 U.S.C. § 2251(a) and (e)

COUNT FIVE
(Possession of Child Pornography)

On or about September 27, 2015, in Calhoun County, in the Southern Division of the Western District of Michigan,

NORMANN ROBERT PITTELKOW

knowingly possessed child pornography, including, but not limited to, one or more of the visual depictions listed in Counts One through Three and one or more of the images listed below by file name:

1. DSC01556.jpg;
2. DSC01557.jpg; and
3. DSC01560.jpg.

Such depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, including, but not limited to, an HP Pavilion computer made outside the state of Michigan.

18 U.S.C. § 2252A(a)(5)(B) and (b)(2)

18 U.S.C. § 2256(8)(A)

FORFEITURE ALLEGATION

(Sexual Exploitation of a Child and Attempted Sexual Exploitation of a Child;
Possession of Child Pornography)

The allegations contained in Counts One through Five of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 2253.

Pursuant to 18 U.S.C. § 2253, upon conviction of an offense in violation of 18 U.S.C. §§ 2251 or 2252A,

**NORMANN ROBERT PITTELKOW and
NICOLE RENEE JACOB**

shall forfeit to the United States of America any visual depiction described in 18 U.S.C. §§ 2251 or 2252A; any matter which contains any such visual depiction that was produced, transported, mailed, shipped, and received in violation of Title 18, United States Code, Chapter 110; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses or any property traceable to such property. The property to be forfeited, as to all counts, includes, but is not limited to, the following:

- a. HP Pavilion Computer, Serial Number H8-1287C, Model Number MXX22600RX-S (Counts 1, 2, 3, 5); and
- b. Samsung Galaxy SIII with blue case, Serial Number GPSAS968CWTB (Count 4).

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b) and by 28 U.S.C. § 2461(c).

18 U.S.C. § 2253
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)
18 U.S.C. § 2251
18 U.S.C. § 2252A
18 U.S.C. § 2256(8)(A)

NOTICE OF PRIOR CONVICTION

The Grand Jury finds that at the time of the illegal acts alleged in Counts One through Five of this Indictment, the defendant, NORMANN ROBERT PITTELKOW, had a prior juvenile adjudication under the laws of any State relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor.

Specifically, on or about January 2, 1991, NORMANN ROBERT PITTELKOW was adjudicated guilty by a juvenile order in Calhoun County, Michigan, of Criminal Sexual Conduct 2nd Degree (Person Under 13), in violation of MCL 750.520C(1)(a), Case Number 9730.

18 U.S.C. § 2251(e)

A TRUE BILL



GRAND JURY FOREPERSON

PATRICK A. MILES, JR.
United States Attorney



TESSA K. HESSMILLER
Assistant United States Attorney