

FILED
08-16-2022
Clerk of Circuit Court
Washington County, WI
2022CF000407
Honorable Michael S.
Kenitz
Branch 3

STATE OF WISCONSIN CIRCUIT COURT WASHINGTON COUNTY

STATE OF WISCONSIN
Plaintiff,
vs.
Christopher William Johnson
[Redacted]
Sex/Race: M/W
Defendant,

DA Case No.: 2022WA001721
Assigned DA/ADA: Stephanie L Hanson
Agency Case No.: 22-025497
Court Case No.:

CRIMINAL COMPLAINT

For Official Use

The undersigned, being first duly sworn, states that:

Count 1: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Tuesday, July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a video, to wit: Filename - AIJ6SNI2KaWNYju-9wPE2NaPRmQ 3.mp4; MD5 - 273c3bb6cc1b58f5aaaf7f9c8b2360f4; and Original Filename - 1ceff255-3027-4295-bd36-7c0aca729dc2.MP4 of a child engaging in sexually explicit conduct, and knew and/or reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 2: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Tuesday, July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a video, to wit: Filename - AF7mNZIRhMbwYju_WAaD-BGyoZE 2.mp4; MD5 - ad63977897fc81e4c3be62f98302d21c; and Original Filename - 54ec2415-c87e-4cca-a93e-c88638477b50.MP4 of a child engaging in sexually explicit conduct, and knew and/or reasonably should have known that the child was under the age of 18, contrary to sec.

948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 3: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Tuesday, July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a video, to wit: Filename - AIJ6SNI2KaWNYju-9wPE2NaPRmQ 2.mp4; MD5 - f03be65ccbc84de13cfd3fa0d4df53b1; and Original Filename - 4854fed7-4bf0-42c8-bdcb-577506b0ae3b.MP4 of a child engaging in sexually explicit conduct, and knew and/or reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 4: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Tuesday, July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess an image, to wit: IMG 3307.PNG of a child engaging in sexually explicit conduct, and knew and/or reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 5: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Tuesday, July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess an image, to wit: IMG_3309.JPG of a child engaging in sexually explicit conduct, and knew and/or reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 6: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Tuesday, July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess an image, to wit: IMG_3310.JPG of a child engaging in sexually explicit conduct, and knew and/or reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall

determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 7: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Tuesday, July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess an image, to wit: IMG_3311.JPG of a child engaging in sexually explicit conduct, and knew and/or reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 8: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Tuesday, July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess an image, to wit: IMG_3312.JPG of a child engaging in sexually explicit conduct, and knew and/or reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 9: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Tuesday, July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a video, to wit: Filename - IMG_4606.MP4; MD5 - 2b42d5597c75b4a26bf34704546282e8 of a child engaging in sexually explicit conduct, and knew and/or reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 10: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Tuesday, July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a video, to wit: Filename - 55423561-f0f4-4f0b-9faa-b7c3fc2d984f; MD5 - 1a0862a74e205485252c569ab45cbdd9 of a child engaging in sexually explicit conduct, and knew and/or reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 11: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Tuesday, July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess an image, to wit: MD5 - 0495f96d4385b62b6ffb48ef4a5f47a3 of a child engaging in sexually explicit conduct, and knew and/or reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 12: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on Tuesday, July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess an image, to wit: Filename - 5005.JPG; MD5 - c601e883a9a179b690a19b11fa481e64 of a child engaging in sexually explicit conduct, and knew and/or reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 13: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)

The above-named defendant on and between Spring 2022, to July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did knowingly install a surveillance device in a

private place, or used a surveillance device to observe in a private place, with the intent to observe any nude or partially nude person without the consent of the person observed, and the victim of the violation had not, at the time of the violation, attained the age of 18 years, contrary to sec. 942.08(2)(a) and (4), 939.50(3)(i) Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

Count 14: POSSESS INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant on and between April 6, 2022, to July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did possess an intimate representation, to wit: Filename - DVO00062.AVI; MD5 - 0b009927a498d74f4d085d3564dd2ec9 captured in violation of sec. 942.09(1) or (2), and knew or had reason to know that the intimate representation was captured in violation of sec. 942.09(1) or (2), and the person depicted in the intimate representation did not consent to the possession, and the person depicted in violation of par. (am) had not, at the time of the violation, attained the age of 18 years, contrary to sec. 942.09(2)(am)3 and (2)(dr), 939.50(3)(h) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

Count 15: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on and between April 6, 2022, to July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a video, to wit: Filename - DVO00062.AVI; MD5 - 0b009927a498d74f4d085d3564dd2ec9 of a child engaging in sexually explicit conduct, and knew and/or reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 16: POSSESS INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant on and between May 1, 2022, to July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did possess an intimate representation, to wit:

Filename - DVO00097.AVI; MD5 - 77c4979adc1c67db3a3acec69e6039a3 captured in violation of sec. 942.09(1) or (2), and knew or had reason to know that the intimate representation was captured in violation of sec. 942.09(1) or (2), and the person depicted in the intimate representation did not consent to the possession, and the person depicted in violation of par. (am) had not, at the time of the violation, attained the age of 18 years, contrary to sec. 942.09(2)(am)3 and (2)(dr), 939.50(3)(h) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

Count 17: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on and between May 1, 2022, to July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a video, to wit: Filename - DVO00097.AVI; MD5 - 77c4979adc1c67db3a3acec69e6039a3 of a child engaging in sexually explicit conduct, and knew and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 18: POSSESS INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant on and between April 27, 2022, to July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did possess an intimate representation, to wit: Filename - he.AVI; MD5 - e056623734957e642c8c97ef113f44cc captured in violation of sec. 942.09(1) or (2), and knew or had reason to know that the intimate representation was captured in violation of sec. 942.09(1) or (2), and the person depicted in the intimate representation did not consent to the possession, and the person depicted in violation of par. (am) had not, at the time of the violation, attained the age of 18 years, contrary to sec. 942.09(2)(am)3 and (2)(dr), 939.50(3)(h) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

Count 19: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on and between April 27, 2022, to July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a video, to wit: Filename - he.AVI; MD5 - e056623734957e642c8c97ef113f44cc of a child engaging in sexually explicit conduct, and knew and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 20: POSSESS EXHIBIT INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant on and between June 5, 2022, to July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did possess an intimate representation, to wit: Filename - close.AVI; MD5 - d33fbe4f15312237239b5a861146ebf8 captured in violation of sec. 942.09(1) or (2), and knew or had reason to know that the intimate representation was captured in violation of sec. 942.09(1) or (2), and the person depicted in the intimate representation did not consent to the possession, and the person depicted in violation of par. (am) had not, at the time of the violation, attained the age of 18 years, contrary to sec. 942.09(2)(am)3 and (2)(dr), 939.50(3)(h) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

Count 21: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on and between June 5, 2022, to July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a video, to wit: Filename - close.AVI; MD5 - d33fbe4f15312237239b5a861146ebf8 of a child engaging in sexually explicit conduct, and knew and reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or

each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 22: POSSESS EXHIBIT INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant on and between April 6, 2022, to July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did possess an intimate representation, to wit: Filename - DVO00061.AVI; MD5 - 7ffc90ee8dc9e03d1d0be6f74090e752 captured in violation of sec. 942.09(1) or (2), and knew or had reason to know that the intimate representation was captured in violation of sec. 942.09(1) or (2), and the person depicted in the intimate representation did not consent to the possession, and the person depicted in violation of par. (am) had not, at the time of the violation, attained the age of 18 years, contrary to sec. 942.09(2)(am)3 and (2)(dr), 939.50(3)(h) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

Count 23: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on and between April 6, 2022, to July 19, 2022, in the City of West Bend, Washington County, Wisconsin, did, having attained the age of 18, knowingly possess a video, to wit: Filename - DVO00061.AVI; MD5 - 7ffc90ee8dc9e03d1d0be6f74090e752 of a child engaging in sexually explicit conduct, and knew and/or reasonably should have known that the child was under the age of 18, contrary to sec. 948.12(1m) and (3)(a), 939.50(3)(d) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

PROBABLE CAUSE:

Complainant prays that said defendant be dealt with according to law. The basis for the complainant's charge of such offense is he is a sworn officer with the West Bend Police Department and bases his information upon his review of official police reports of and statements made by fellow law enforcement officers from the West Bend Police Department.

Detective Jacob Chihak reported that on July 6, 2022, he received two CyberTipline Reports # 120942716 (1 image), and # 120943717 (25 images) from the Wisconsin Department of Justice, Division of Criminal Investigations, of reported images of suspected child pornography being uploaded from an IP address in the City of West Bend, and the IP address of a business in Menomonee Falls. On July 19, 2022, Detective Chihak obtained search warrants for the residence in the City of West Bend, Washington County, Wisconsin, the business in the Village of Menomonee Falls, Waukesha County, Wisconsin, with the reported IP addresses, and two vehicles associated with the suspect Christopher W Johnson.

Detective Bryan Goehring reported that on July 20, 2022, he assisted with the execution of the search warrant for the residence associated with one of the reported IP addresses in the City of West Bend, Washington County, Wisconsin. Detective Goehring reported that he collected a number of items from the residence, including a Microsoft tablet, an Apple computer, Apple iPhones, Apple iPods, numerous CDs, 8 USB flash drives and SD cards, HP external hard drive, an iPad, a WD external hard drive, a laptop computer, a Nikon digital camera, a smart watch, two Sentry safes. Detective Goehring reported that he transported the items of evidence collected at the residence to the West Bend Police Department.

Detective Chihak reported that on July 20, 2022, he executed a search warrant at the business associated with one of the reported IP addresses in the Village of Menomonee Falls, Waukesha County, Wisconsin, where the suspect Christopher W Johnson was employed. Detective Chihak made contact with Christopher W Johnson, the defendant herein, in the parking lot of the business. Detective Chihak reported that defendant was not in custody, and allowed to move about freely during their conversation, during which defendant made statements which complainant believes as statements against defendant's penal interest, wherein defendant confirmed his name, his date of birth [REDACTED] and phone number [REDACTED]. Defendant stated that he had two email accounts which were Gmail: [REDACTED] and [REDACTED]. Defendant stated that he used to have Yahoo email accounts: [REDACTED] and [REDACTED]. Defendant admitted to using an email that was ericg0125 but was unsure if it was a Yahoo email or Gmail email. Defendant stated that he is the only user of the email accounts as far as he knew. Defendant acknowledged he received some images of naked girls on his email [REDACTED] but was unsure how old the girls were in the images. Defendant stated that he believed they were legal age and possibly in their 20's. Defendant stated that he received at least one image that was of a girl younger than 18. Defendant stated he still believed/assumed they were over 18. Defendant stated that he had his phone with him in his pocket, and he had some porn images on his phone. When asked if any images would be girls that appear to be under 18, defendant responded, "I don't know what to say about that." Detective Chihak placed defendant under arrest, and in a search incident to arrest located an Apple iPhone 13 Pro which was secured as evidence. Detective Chihak then executed the search warrant inside the business, and seized a desktop computer.

Detective Chihak reported that once at the West Bend Police Department, Digital Forensic Examiner Guerrero, who conducted a partial download of defendant's Apple iPhone 13 Pro, located three images of child pornography from CyberTipline Report 120943717. DFE Guerrero located 5 additional images of child pornography, and images zoomed in on the genital area of clothed subjects who appeared to be Victim #1, DOB [REDACTED], Victim #2, DOB [REDACTED], and Victim #3, DOB [REDACTED]. DFE Guerrero also advised that he believed defendant had images from a hidden camera at the residence which showed images of someone getting in and out of the shower. DFE Guerrero was only able to obtain a partial download of the phone, after which the partial download, defendant's cell phone, a laptop, an Apple iPad, and external hard drive were secured in an evidence locker at the West Bend Police Department.

Detective Chihak reported that he proceeded to the residence associated with one of the reported IP addresses in the City of West Bend, Washington County, Wisconsin, where he made contact with Witness #1, DOB [REDACTED], a citizen witness whom complainant believes, who stated that images from the hidden camera may have been taken in Victim #1's bathroom in the basement of the residence, and that Victim #1 is the only user of the bathroom. Detective Chihak reported that he was given consent to search for hidden cameras in the basement bathroom. In the bathroom, Detective Chihak observed the same light green towels depicted in the picture from the hidden camera. Detective Chihak also located a small hole in the wood cabinet just under the sink top. Inside the cabinet, Detective Chihak located a drilled out portion of the upper cabinet which appeared to have been modified to allow a camera to be placed in that location. Detective Chihak did not locate the camera within the cabinet. Witness #1 stated that she did not consent to anyone, including defendant, placing a hidden camera in the bathroom. Witness #1 confirmed that defendant had his phone at the residence on July 19, 2022, around 9:00 p.m., when they went to bed. Witness #1 stated that defendant usually had his phone with him so she assumed he took his phone with him when he left for work on July 20, 2022.

Detective Chihak reported that on July 21, 2022, he began to review defendant's Cellebrite phone download which contained over 400,000 images. Detective Chihak reported that in his brief initial review, he located an additional image of suspected child pornography, identified as image MD5-7f68608252ef2ffc68533a90fcef9121 and file c5dd517e-3cbe-404c-97aa-5c24ccbca340. Detective Chihak reported that he also located hundreds of images and videos which appeared to have been taken by the hidden camera in the basement bathroom of Victim #1, many of which included nudity. Detective Chihak showed Witness #1 sanitized photographs from the hidden camera. Witness #1 identified Victim #1 in the photographs. Witness #1 identified the [REDACTED] pants in the pictures as belonging to Victim #1, which were [REDACTED] to Victim #1 in [REDACTED]. Witness #1 stated that Victim #1 was the only person in the residence to utilize the basement bathroom. Witness #1 confirmed she did not consent to any images being taken of any of her daughters or to have anyone install any camera in the basement bathroom. Detective Chihak reported that during forensic interviews of Victim #1, Victim #2, and Victim #3, all three confirmed no one had consent to install cameras or to photograph them naked or photograph their private parts.

Detective Chihak reported that over the course of the next several days, Witness #1 reported locating a box for a spy camera with a charging cord, two SD adapter cards, and a disc with the word "Acoustic" in defendant's standing toolbox in the garage of the residence. Detective Chihak reported that the box showed the camera was an Allwestcom brand "Spy Camera no

Wi-Fi Networkable Hidden Recorder.” Detective Chihak reported that Witness #1 later located a spy camera within the residence. Detective Chihak reported that Witness #1 turned all of the items over to the West Bend Police Department.

Detective Chihak reported that the following three (3) images of suspected child pornography were located during DFE Guerrero’s partial download, which were contained in Cyber Tipline Report 120943717, to wit:

Ct. 1: Filename - AIJ6SNI2KaWNYju-9wPE2NaPRmQ_3.mp4; MD5 - 273c3bb6cc1b58f5aaaf7f9c8b2360f4; and Original Filename - 1ceff255-3027-4295-bd36-7c0aca729dc2.MP4 - the image was sent on the Cybertip on March 23rd, 2022, at 7:44 PM (CST), and last accessed on July 2, 2022, is described as follows:

The image is a 30-second video of a prepubescent white female subject with brown hair, about 8-years-old, in what appears to be a standing position. The girl is naked from the waist down, and she is wearing a teal shirt. The girl rubs her vagina with the fingers on her left hand. Later in the video, the girl spreads her vagina with both of her hands. Toward the end of the video, the girl inserts the index finger on her left hand into her vagina. The girl’s vagina has minimal development. The girl’s vagina does not have any visible pubic hair.

Ct. 2: Filename - AF7mNZIRhMbwYju_WAaD-BGyoZE_2.mp4; MD5 - ad63977897fc81e4c3be62f98302d21c; and Original Filename - 54ec2415-c87e-4cca-a93e-c88638477b50.MP4 - the image was sent on the Cybertip on March 23rd, 2022, at 7:44 PM (CST), and last accessed on April 22, 2022, is described as follows:

The image is a 1-minute and 41-second video of a pubescent white female subject with brown hair, about 13-15 years old, in a kneeling position, who is naked from the waist down and wearing a red shirt and black shorts. The girl’s face is visible in the video. As the video begins, the girl removes the shirt and exposes her breasts. The girl then grabs, rubs, and squeezes her breasts with both her hands. The girl then removes her black shorts. The girl then seems to call a dog to her, and the dog’s head lays between her legs. The dog then begins licking the area of her vagina, although the vagina is not visible. The dog is a white and dark colored, larger-breed dog. The girl’s breasts have minimal development.

Ct. 3: Filename - AIJ6SNI2KaWNYju-9wPE2NaPRmQ_2.mp4; MD5 - f03be65ccbc84de13cfd3fa0d4df53b1; and Original Filename - 4854fed7-4bf0-42c8-bdcb-577506b0ae3b.MP4 - the image was sent on the Cybertip on March 23rd, 2022, at 7:44 PM (CST), and last accessed on March 24, 2022, is described as follows:

The image is a 1-minute and 59-second video of a prepubescent white female subject with blonde hair, about 8-years-old, in a crouched position. The girl is naked, with her breasts and vagina exposed. The girl’s face is visible in the video. As the video begins, the girl begins rubbing her vagina against what appears to be a doll on the ground by thrusting her body back and forth. The girl’s breasts and vagina have minimal development. The girl’s vagina does not have any visible pubic hair.

Detective Chihak reported that in addition to three (3) videos from the original Cyber Tipline report, DFE Guerrero located five (5) additional images of suspected child pornography. Detective Chihak reported that he observed these images, and describes them as follows:

Ct. 4: IMG_3307.PNG - Created Date - 08/01/21 & Last Accessed Date - 03/24/22, is described as follows:

A still image of a prepubescent white female child with blonde hair about 11-years-old in a reclined position. The girl was nude with her breasts, vagina, and anus exposed. The girl's legs were spread so as to further expose her vagina. The girl had a pink and white item (believed to be a sex toy of some type) inserted into her vagina and partially protruding from the vagina. The girl's breast and vagina had almost no development. The girl's vagina did not have any visible pubic hair.

Ct. 5: IMG_3309.JPG - Created Date - 08/01/21 & Last Accessed Date - 08/01/21, is described as follows:

A still image of a prepubescent white female child with blonde hair about 11-years-old lying on her back. The girl was nude with her breasts, vagina, and anus exposed. The girl's legs were spread so as to expose her vagina. The girl's breast and vagina had almost no development. The girl's vagina did not have any visible pubic hair.

Ct. 6: IMG_3310.JPG - Created Date - 08/01/21 & Last Accessed Date - 03/24/22, is described as follows:

A still image of a prepubescent white female child with blonde hair about 11-years-old in a seated position on what appeared to be a bed. The girl was nude with her breasts, vagina, and anus exposed. The girl's legs were spread so as to further expose her vagina. The girl's breast and vagina had almost no development. The girl's vagina did not have any visible pubic hair. It appeared the girl in this image was the same as the girl in IMG_3309.JPG (Count 5).

Ct. 7: IMG_3311.JPG - Created Date - 08/01/21 & Last Accessed Date - 07/02/22, is described as follows:

A still image of a penis partially inserted into a vagina. The penis had pubic hair along the base of the penis and on the legs of the white male. The penis appeared to have a clear liquid (suspected ejaculate) at the point where the penis was inserted into the vagina. The vagina did not have any development or visible pubic hair. The vagina appeared to belong to a young child based on my training and experience in these types of investigations.

Ct. 8: IMG_3312.JPG - Created Date - 08/01/21 & Last Accessed Date - 03/24/22, is described as follows:

A still image of a penis partially inserted into a vagina. The penis had pubic hair along the base of the penis. The penis appeared to have a clear liquid (suspected ejaculate) at the point where the penis was inserted into the vagina and along the top of the penis. The vagina had minimal development and only a very few visible pubic hairs. The vagina appeared to belong to a pubescent female based on my training and experience in these types of investigations.

Detective Chihak reported that DFE Guerrero also located images zoomed in on the genital area of clothed subjects who appeared to be Victim #1, Victim #2, and Victim #3. Detective Chihak noted that in some of the images of zoomed in genital, specifically vaginal, areas there was a blanket which was an exact match to a blanket found at the residence during the search warrant. The blanket was in the living room of the residence, and the images appeared to have the living room couch in the background.

Detective Chihak reported during his review of defendant's Axiom phone download, he found additional images of suspected child pornography, which he described as follows:

Ct. 9: Filename - IMG_4606.MP4; MD5 - 2b42d5597c75b4a26bf34704546282e8; Created Date - 05/22/22; & Last Accessed Date - 05/22/22, is described as follows:

A video, 1 minute and 3 seconds in length, which depicts a white female subject with brown hair wearing an orange short-sleeved shirt and green shorts. The girl was in a seated position with her legs spread. Based on my training and experience, I estimated the age of the girl to be about 12 years old. The girl rubbed the area of her vagina with her right hand/fingers. The girl then removed her shirt and exposed her breasts. The girl then rubbed her breast with her left hand/fingers. The girl then bent over and exposed her anus and vagina. The girl then licked her fingers on her right hand and began rubbing her vagina. The girl's breast and vagina had minimal development. The girl's vagina did not have any visible pubic hair.

Ct. 10: Filename - 55423561-f0f4-4f0b-9faa-b7c3fc2d984f; MD5 - 1a0862a74e205485252c569ab45cbdd9; Created Date - 07/13/22; & Last Accessed Date - 07/14/22, is described as follows:

A video, 42 seconds in length, which depicts the face of a white female subject with shoulder length brown hair. The girl appeared to be about 13-years-old. The girl appeared to be lying on her back and was wearing a white bra. The camera and girl became to move back and forth as if the person holding the camera was thrusting their body. The girl began moaning. The girl pulled her bra upwards and exposed her breasts. The video then shifted to a penis penetrating the girl's vagina repeatedly. The camera then panned back to the girl's face and a hand (likely that of the male) was on her chest. At several points, a male (presumably holding the camera) and the female child's voice were heard speaking and I heard they were speaking Spanish. The girl's breast and vagina had minimal development. The girl's vagina did not have any visible pubic hair.

Ct. 11: MD5 - 0495f96d4385b62b6ffb48ef4a5f47a3, is described as follows:

An image depicting a nude white female with blonde hair subject in a kneeling position with a purple comb positioned so that the handle of the comb was near the vagina of the girl. The girl was appeared to be about 12-years-old. The girl's breast and vagina had minimal development. The girl's vagina did not have any visible pubic hair.

Ct. 12: Filename - 5005.JPG; MD5 - c601e883a9a179b690a19b11fa481e64; Created Date - 04/23/21; & Last Accessed Date - 04/23/21, is described as follows:

An image depicting a nude white female with brown hair in a seated position in a kitchen. The girl had some sort of object inserted in her vagina. The girl was appeared to be about 13-years-old. The girl's breast and vagina had minimal development. The girl's vagina did not have any visible pubic hair.

Detective Chihak reported that during his review of defendant's Axiom phone download, he located numerous nude videos of Victim #1 in her basement bathroom, and the black and white plaid pants belonging to Victim #1 were visible in several of the videos. Detective Chihak observed that the camera was situated in a manner that the genital area of Victim #1 were the primary focus, and recorded Victim #1 both clothed and unclothed. Detective Chihak

determined that while the face of Victim #1 was often times not visible due to the placement of the spy camera, based on the totality of his investigation, Detective Chihak determined that the female depicted in the videos was Victim #1. Detective Chihak further noted that the creation date of most of the videos are in 2019, which is likely incorrect due to Victim #1 wearing the black and white plaid pants that were a Christmas gift in December 2021.

Ct. 14 and Ct. 15: Filename - DVO00062.AVI; MD5 - 0b009927a498d74f4d085d3564dd2ec9; Created Date - 05/09/19; & Last Accessed Date - 04/06/22

The video, which was 4 minutes in length, depicts Victim #1 bent over in front of the camera with her face exposed and with a towel wrapped around her head. Victim #1's breasts were exposed. Victim #1 put on pink underwear. As she put on the underwear, Victim #1's exposed vagina was visible. Victim #1 then put on the white and black plaid pants. At one point, Victim #1 put a towel on the towel rack. As Victim #1 bent over to grab the black long-sleeved shirt, her exposed breasts and face were visible. Victim #1 then put on the black long-sleeved shirt.

Ct. 16 and Ct. 17: Filename - DVO00097.AVI; MD5 - 77c4979adc1c67db3a3acec69e6039a3; Created Date - 06/04/19; & Last Accessed Date - 05/01/22

The video, which was 7 minutes and 24 seconds in length, depicts Victim #1 seeming to just get out of the shower and bend over. Victim #1's face was visible. Victim #1 wrapped a towel around her back. As she continued drying herself, she turned and exposed her vagina. Victim #1 wrapped the towel around her head and bent over later. Victim #1's breasts, buttocks, and face were exposed as she bent over. Victim #1 then put on gray underwear. Victim #1 put on the black and white plaid pants as she was bent over which again exposed her breasts. Victim #1 then bent over to get a pink bra which again exposed one of her breasts. Victim #1 put on the black long sleeved shirt and the blue sweatshirt. Victim #1 bent over again and exposed her face in camera view.

Ct. 18 and Ct. 19: Filename - he.AVI; MD5 - e056623734957e642c8c97ef113f44cc; Created Date - 04/11/19; & Last Accessed Date - 04/27/22

The video, which was 6 minutes and 44 seconds in length, depicts Victim #1 with a towel around her body. Victim #1 then turned toward the camera exposing her vagina. Victim #1 then bent over and exposed her buttocks. Victim #1 then put on pink underwear. Victim #1 then put on the black and white plaid pants. Victim #1 bent over to pick up the black long-sleeved shirt which exposed her face and breasts.

Ct. 20 and Ct. 21: Filename - close.AVI; MD5 - d33fbe4f15312237239b5a861146ebf8; Created Date - 06/11/19; & Last Accessed Date - 06/05/22

The video, which was 7 minutes and 7 seconds in length, depicts Victim #1 walking toward the camera with only her lower stomach, waist, and some of her upper legs showing. Victim #1 appears to be naked. Victim #1's vagina is not clearly visible in the beginning of the video. Victim #1 has a towel around her body. At several points, Victim #1's head which now has a towel over it goes in front of the camera. A short time later, Victim #1 has a razor in her hand and her left breast and nipple is exposed in the video. Later, Victim #1 turned away from the camera and exposed her naked buttocks as she walked away. Victim #1 with her face exposed bends over in full view of the camera and is naked (both breasts and nipples exposed). Victim #1 is wearing the towel over her head. Victim #1 puts on blue underwear then the white and black plaid pants. At times, Victim #1's bare breasts are visible in the as she puts on her clothes. Toward the end of

the video, Victim #1 is shown with a pink bra and then puts on a black, long-sleeved shirt.

Ct. 22 and Ct. 23: Filename - DVO00061.AVI; MD5 - 7ffc90ee8dc9e03d1d0be6f74090e752; Created Date - 05/09/19; & Last Accessed Date - 04/06/22

The video, which was 2 minutes in length, depicts Victim #1 throwing some clothes down on the floor past the camera. The white and black plaid pants were with the clothes Victim #1 threw down. Victim #1 bends down in front of the camera and her face was visible. Victim #1 then stood in front of the camera with her vagina exposed as she was not wearing any underwear or pants.

Detective Chihak reported that he observed additional videos of Victim #1 depicting nudity in the basement bathroom as follows:

Filename - DVO00021.AVI; MD5 - d6347479ce6acd7cb469057712a81938; Created Date - 04/11/19; & Last Accessed Date - 05/01/22

The video, which is 2 minutes and 31 seconds in length, depicts Victim #1 dropping clothes on the ground. Victim #1 begins removing clothes. At one point, Victim #1 removed her black pants and exposed her vagina. As she continued removing her pants, her exposed breasts were visible. Victim #1 walked toward the shower and her exposed buttocks were visible.

Filename - DVO00053.AVI; MD5 - 697b732b0745549f8c2856ce66c0846e; Created Date - 05/07/19; & Last Accessed Date - 04/03/22

The video, which was 2 minutes and 55 seconds in length, depicts Victim #1 walking past the camera. Victim #1 begins to remove her clothing. At one point, Victim #1 removed her underwear and pants and the pubic hair above her vagina is visible. Victim #1's exposed buttocks are visible moments later. A short time later, Victim #1 moved past the camera with her vagina exposed as she walked toward the shower.

Filename - DVO00085.AVI; MD5 - da41d12e07bd0c56c3499009c2f0cb11; Created Date - 05/28/19; & Last Accessed Date - 04/24/22

The video, which was 3 minutes and 42 seconds in length, depicts Victim #1 walking in front of the camera and dropped some clothes on the floor including the white and black plaid pants. Victim #1 then took off her clothes. Victim #1 bent over and her blonde hair showed and a brief and partial view of her nose and forehead. Victim #1 then walked back and forth, in and out of view of the camera. At one point, Victim #1 walked back in view of the camera naked with her exposed vagina. Victim #1 then walked toward the shower.

Filename - DVO00096.AVI; MD5 - 70e817f47a6d100d0a88b7d4ba68ff2a; Created Date - 06/04/19; & Last Accessed Date - 05/01/22

The video, which was 2 minutes and 18 seconds in length, depicts Victim #1 walking in front of the camera and dropped some clothes on the floor. Victim #1 then took off her clothes. At one point, Victim #1 removed her pants and underwear, exposing her buttocks. Victim #1 walked toward the shower then turned back toward the camera. Victim #1's vagina was exposed for a time before she walked back toward the shower and out of view of the camera.

Filename - DVO00106.AVI; MD5 - df72ee2ce25b9ce4da512ce841177b57; Created Date - 06/26/19; & Last Accessed Date - 05/23/22

The video, which was 1 minute and 15 seconds in length, depicts Victim #1 bending over in view of the camera. Victim #1 was naked. Her blonde hair and breasts were exposed. Victim #1's hair covered her face. Victim #1 stands up and turns toward the camera exposing her vagina. Victim #1 turns away from the camera and exposed her buttocks. Victim #1 then walked toward the shower and out of camera view.

Filename - DVO00008.AVI; MD5 - 25a6e5dbf0d13ae9267751e5ff0f397d; Created Date - 03/26/19; & Last Accessed Date - 03/25/22

The video, which was 4 minutes and 4 seconds in length, depicts Victim #1 walking into the bathroom and setting down the white and black plaid pants. Victim #1 began taking off her clothes. At one point, as Victim #1 bends over to remove a sock, her face is visible. Victim #1's naked buttocks are exposed.

Filename - DVO00055.AVI; MD5 - 59b84dfbe22152d9938fbde6921ae4ad; Created Date - 05/07/19; & Last Accessed Date - 04/03/22

The video, which was 1 minute and 3 seconds in length, depicts Victim #1 walking past the camera. Victim #1's lower stomach, waist, and some of her upper legs are exposed/without clothes. Victim #1 appears to be naked. Victim #1's vagina is not clearly visible in the beginning of the video but she is not wearing any underwear. Victim #1 has a towel around her body.

Filename - DVO00017.AVI; MD5 - 27aab0ae0918726451c2a4b7133b09cd; Created Date - 04/10/19; & Last Accessed Date - 03/25/22

The video, which was 5 minutes and 4 seconds in length, depicts Victim #1 standing naked (at least her lower stomach, waist, vagina, and some of her upper legs were not covered) in front of the camera. Victim #1's vagina was exposed and had no visible pubic hair. Victim #1 moved out of view of the camera for a time. Victim #1 then moved back in front of the camera now with a towel over her head. Victim #1's buttocks and breasts were exposed as she bent over. Victim #1 put on teal underwear. Victim #1 then put on the white and black plaid pants. Victim #1 hung up her towel then put on the black long-sleeved shirt.

Filename - DVO00047.AVI; MD5 - d0e353f8e47bdceb8031c22132fc9532; Created Date - 04/23/19; & Last Accessed Date - 03/25/22

The video, which was 3 minutes and 40 seconds in length, depicts Victim #1 in front of the camera and facing away from the camera which exposed her nude buttocks. Victim #1 put on a pair of purple underwear. Victim #1 then put on the white and black plaid pants.

Filename - DVO00068.AVI; MD5 - 8daab7c77672bf5ffe62d9e3af7b6222; Created Date - 05/16/19; & Last Accessed Date - 04/13/22

The video, which was 1 minute and 56 seconds in length, depicts Victim #1 entering the bathroom and begin taking off her clothes. Victim #1 bent over and removed her underwear and pants. Victim #1 is wearing a light-colored bra. Victim #1's face is visible as she bent over. Victim #1's exposed buttocks were captured. Victim #1 then turned toward the camera and her exposed vagina was captured.

Filename - DVO00069.AVI; MD5 - f5fbb2dad093507346b3777ff628195d; Created Date - 05/16/19; & Last Accessed Date - 04/13/22

The video, which was 5 minutes and 16 seconds in length, depicts Victim #1 standing in front of the camera with her vagina exposed. At one point, Victim #1 bent over slightly and her

exposed right breast was visible. Victim #1 then bent over and her face and breasts were exposed. Victim #1 had a towel wrapped around her head. Victim #1 put on pink underwear. Victim #1 bent over again and her face and breasts were both exposed. Victim #1 then put on the white and black plaid pants. Victim #1 leaned over and picked up the black long-sleeved shirt exposing her breasts as she did so. Later, Victim #1 also appeared to put on a blue sweatshirt of some kind and leaned over which again showed her face.

Filename - DVO00078.AVI; MD5 - 68aa5a6a9e4ec67fe3fa37ebd8678d7f; Created Date - 05/21/19; & Last Accessed Date - 04/17/22

The video, which was 4 minutes and 50 seconds in length, depicts Victim #1 who initially is only partially visible. Victim #1 is putting on a pair of pink underwear. Victim #1 bent over in front of the camera and her face and breasts are exposed. Victim #1 put on a green pair of pants. After putting on the pants, Victim #1 bent over several more times exposing her left breast.

Filename - DVO00100.AVI; MD5 - 137cc70f5c03bcde5b6f5e19a8470377; Created Date - 06/11/19; & Last Accessed Date - 05/08/22

The video, which was 1 minute and 51 seconds in length, depicts Victim #1 walking in front of the camera and dropped some clothes on the floor including the white and black plaid pants. Victim #1 then took off her clothes. Victim #1 then moved into camera view with her buttocks exposed. Victim #1 then walked toward the shower and out of camera view.

Filename - DVO00109 1.AVI; MD5 - 60250d7961c84bde3eba27f0257feb76; Created Date - 06/26/19; & Last Accessed Date - 06/05/22

The video, which was 3 minutes and 36 seconds in length, depicts Victim #1 hanging up a towel and was wearing pink underwear. Victim #1 bent over to put on the black and white plaid pants and as she did so, her blonde hair, breasts, and face were exposed.

Filename - Video.AVI; MD5 - 25a6e5dbf0d13ae9267751e5ff0f397d; Created Date - 03/26/19; & Last Accessed Date - 04/24/22

The video, which was 4 minutes and 4 seconds in length, depicts Victim #1 walking into the bathroom and setting down the white and black plaid pants. Victim #1 began taking off her clothes. At one point, as Victim #1 bends over to remove a sock, which made her face is visible. Victim #1's naked buttocks are exposed.

Filename - DVO00004.AVI; MD5 - f481971903f24d520c2a6448f56d185b; Created Date - 03/19/19; & Last Accessed Date - 03/25/22

The video, which was 3 minutes and 54 seconds in length, depicts Victim #1 wearing the black and white plaid pants and bending over to pick up her black long-sleeved shirt. As she bent over, Victim #1's right breast and face were exposed.

Filename - IMG_4544.MP4; MD5 - 97c62185b9220091f16161ac4b8c4439; Created Date - 05/08/22; & Last Accessed Date - 05/08/22

The video, which was 33 second in length, depicts Victim #1's exposed buttocks in camera view. Victim #1 walked toward the bathroom then turned back around walking into camera view. Victim #1's vagina was exposed. The video appeared to be accessed on an application called "VideoPlayer" on an Apple iPhone.

Detective Chihak reported that he located at least 19 additional videos of Victim #1 from the basement bathroom spy camera which appeared to show nudity, based on his quick review. Detective Chihak located several images of underwear with what appeared to be ejaculate on the underwear, underwear with a penis in the background, and a video in which a subject stroked his penis with some underwear around the penis, and the male stated, "these are hers," "these are her moms, and "my big [REDACTED]."

Detective Chihak reported that he reviewed portions of the defendant's messages on Kik which Detective Chihak knows to be a messaging platform commonly used by individuals involved in child sexual assault and child pornography, based on training and experience. Detective Chihak reported that defendant's Kik Username was ericg0125 which matched the suspect email in the Cyber Tipline report. On June 21, 2022, the defendant had the following communications with Kik Username "Adam [REDACTED]" to wit:

On 06/21/22, at 11:54 AM, Christopher sent "Adam", "Welcome to the group. I also sniff my step daughters panties"
On 06/21/22, at 11:54 AM, "Adam" sent Christopher, "How old is she" - Christopher responded, "15"
On 06/21/22, at 11:54 AM, Christopher sent "Adam", "When did you start?" - "Adam" responded, "10" and "You"
On 06/21/22, at 11:55 AM, Christopher sent "Adam", "12 ish"
On 06/21/22, at 11:58 AM, Christopher sent "Adam" a picture of blue underwear with a white-ish colored substance on them
On 06/21/22, at 11:59 AM, "Adam" sent Christopher, "You should cum in her clean ones." - Christopher responded, "I have"
On 06/21/22, at 11:59 AM, Christopher sent "Adam", "I've wiped cum in her panties right before she put them on"
On 06/21/22, at 12 PM, Christopher sent "Adam", "She had her clothes on the bathroom counter right before she showered. I told her I had to "go quick". All I did was jack off and wipe some inside"
On 06/21/22, at 12:01 PM, Christopher sent "Adam", "I've cum on her toothbrush"
On 06/21/22, at 12:04 PM, Christopher sent "Adam" a picture of Victim #1 doing yoga
On 06/21/22, at 12:04 PM, "Adam" sent Christopher, "How's she in bed" - Christopher responded, "That's the kid" and "Tbh. I wish I could touch some days"
On 06/21/22, at 12:06 PM, "Adam" sent Christopher, "You should try a sleeping pill" Christopher sent two more zoomed-in pictures of vaginal regions with clothes on the a third picture of Victim #1 (clothed) looking out window with binoculars
On 06/21/22, at 1:17 PM, Christopher sent "Adam", "I use to cum in her bathing suit. She use to swim in a club."
On 06/21/22, at 1:18 PM, "Adam" sent Christopher, "Would you like to see her getting [REDACTED]" - Christopher responded, "You have a video or pic? I'd love it"
On 06/21/22, at 1:20 PM, "Adam" sent Christopher, "I was talking about you watching your daughter" and "Have you got a y better pics of her"
On 06/21/22, at 1:23 PM, Christopher sent "Adam", "What do you mean by any better pics? I'd rather be the one [REDACTED] my step daughter"

On 06/21/22, at 1:28 PM, Christopher sent "Adam", "Sometimes I'll pick her up and my hands will interlock on her ass. Then I put my thumbs forward so they are up against her mound. I've done this since she was smaller. She doesn't think twice about it."

On 06/21/22, at 1:29 PM, Christopher sent "Adam", "The other day she had those shorts in the one pic on so my thumbs were actually inside her shorts."

Detective Chihak reported that on July 4, 2022, defendant had the following communications with Kik Username "Julie [REDACTED]," to wit:

On 07/04/22, at 3:01 PM, Christopher sent "Julie", "43 m and I also love my step daughters panties."

On 07/04/22, at 3:44 PM, Christopher sent "Julie", "How olds yours?" - "Julie" responded, "17-19 are the two"

On 07/04/22, at 3:45 PM, Christopher sent "Julie", "Nice. I have 3 l3 13 l t" and "15"

On 07/04/22, at 3:45 PM, Christopher sent "Julie", "Grr. 13,13 15"

On 07/04/22, at 3:54 PM, Christopher sent "Julie" a picture of Victim #1 doing yoga with clothes on. Christopher sent another picture of Victim #1 then a pictures of a white person sitting on grass with the face scrubbed from the picture to prevent identification

On 07/04/22, at 4:02 PM, Christopher sent "Julie", "Last pic is youngest" - "Julie" responded, "Bet she smells so good down there"

On 07/04/22, at 4:03 PM, Christopher sent "Julie", "I like the oldest one best. She gets creamy." - Christopher later sent the two pictures of pink underwear described above

On 07/04/22, at 4:43 PM, Christopher sent "Julie", "The oldest is the only one I sniff. The other 2 don't do much for me" and "But god do I love the cream from her r"

On 07/04/22, at 4:44 PM, Christopher sent "Julie", "Some days she has the cream and it tastes so good. Other days I love to rub her cream on my shaft"

Detective Chihak reported that on July 4, 2022, defendant had the following communications with Kik Username "Joe Joe," to wit:

On 07/04/22, at 4:59 PM, Christopher sent "Joe Joe", "I sniff the step daughters"

On 07/04/22, at 5:15 PM, "Joe Joe" sent Christopher, "Can i see pantys from ur household?" - Christopher responded, "Let's see some of yours?"

On 07/04/22, at 5:17 PM, Christopher sent "Joe Joe" a picture of pink underwear with what appeared to be a wet spot in the middle - The picture appeared to be the same picture Christopher sent in previous Kik Messages with others

On 07/04/22, at 5:24 PM, Christopher sent "Joe Joe" a picture which was zoomed in on the vaginal area of a white person wearing black shorts in which pink underwear were barely visible the another picture of a white person sitting on grass with the face scrubbed from the picture to prevent identification (Christopher later identified the scrubbed photograph as one of the youngest girls)

On 07/04/22, at 5:26 PM, "Joe Joe" sent Christopher, "O nice pink undies i think" - Christopher responded, "Yes" and "It's the wet ones from the panty pic"

Detective Chihak reported that on July 8, 2022, defendant had the following communications with Kik Username "horny lad," to wit:

On 07/08/22, at 6:46 AM, "Horny Lad" sent Christopher, "Hi so ur step daughter 15 wow wish Mine was that age again please may I see her" - Christopher responded that he doesn't show pics of her

On 07/08/22, at 6:48 AM, "Horny Lad" sent Christopher, "OK mate no worrys bet her knickers smell so good" - Christopher responded, "They do. So wet and creamy"

On 07/08/22, at 6:53 AM, "Horny Lad" sent Christopher, "Mmmm can I see her knickers what age was she when u started using them dose ur wife know" - Christopher responded, "Wife doesn't know."

On 07/08/22, at 6:59 AM, "Horny Lad" sent Christopher, "Mmmm u think of [REDACTED] her when ur in bed with the wife" - Christopher responded, "I think more about just touching her."

On 07/08/22, at 7:01 AM, "Horny Lad" sent Christopher, "Mmmm yes nice god want to see her I will show u my daughter" - Christopher responded, "Let's see yours first"

On 07/08/22, at 7:06 AM, "Horny Lad" sent a picture message to Christopher – Christopher responded, "How old?"

On 07/08/22, at 7:07 AM, "Horny Lad" sent Christopher, "15 u like"

On 07/08/22, at 7:13 AM, Christopher sent "Horny Lad" a picture of Victim #1 - "Horny Lad" responded, "Nice long legs nive around ur head"

On 07/08/22, at 7:14 AM, Christopher sent "Horny Lad", "I wish"

On 07/08/22, at 7:17 AM, "Horny Lad" sent Christopher, "Mmm me 2 u ever see up her skirts seeing her knickers" - Christopher responded by sending a picture of a white person white shorts and legs with the picture zoomed in on the vaginal area (based on context I determined it was Victim #1)

Christopher continued sending pictures of Victim #1.

Detective Chihak reported that he reviewed a substantial amount of media – on both Cellebrite platform and Axiom platform, including videos and images, on defendant's phone, as well as messages on the phone, but did not complete a comprehensive and total review of the media as of August 15, 2022. Detective Chihak further reported additional pieces of evidence will need to be transmitted to the Wisconsin Department of Justice, Criminal Investigation Division, for forensic analysis.

Based on the foregoing, the complainant believes this complaint to be true and correct.

Subscribed and sworn to before me on 08/16/22
Electronically Signed By:
Stephanie L Hanson
Assistant District Attorney
State Bar #: 1025050

Electronically Signed By:
Detective Kneprath
Complainant