

**FILED**  
**07-28-2023**  
**Clerk of Circuit Court**  
**Washington County, WI**  
**2023CF000334**  
**Honorable Ryan J. Hetzel**  
**Branch 1**

**STATE OF WISCONSIN      CIRCUIT COURT      WASHINGTON COUNTY**

STATE OF WISCONSIN

Plaintiff,

DA Case No.: 2023WA001798  
Assigned DA/ADA: Grant D Scaife  
Agency Case No.: 23-25878WCSD  
23-020593

vs.

Steven James Weis

Court Case No.:

West Bend, WI 53095

DOB: 09/27/1977

Sex/Race: M/W

Defendant,

**CRIMINAL COMPLAINT**

*For Official Use*

The undersigned, being first duly sworn, states that:

**Count 1: EXPOSING INTIMATE PARTS**

The above-named defendant between November 1, 2022 and March 1, 2023, Washington County, Wisconsin, for purposes of sexual arousal or gratification, did expose his intimate parts to a child, contrary to sec. 948.10(1) and (1)(a), 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 2: EXPOSING INTIMATE PARTS**

The above-named defendant between November 1, 2022 and March 1, 2023, Washington County, Wisconsin, for purposes of sexual arousal or gratification, did expose his intimate parts to a child, contrary to sec. 948.10(1) and (1)(a), 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 3: STALKING**

The above-named defendant between July 28, 2017 through July 14, 2023 in the City of West Bend, Washington County, Wisconsin, did intentionally engage in a course of conduct directed at a specific person to wit: Victim 1, that caused that person and that would cause a reasonable person under the same circumstances to suffer serious emotional distress or to fear bodily injury or death to themselves or to a member of their family or household and where the defendant knew or should have known that at least one of the acts that constituted the course of conduct caused Victim 1 to suffer serious emotional distress or placed Victim 1 in reasonable fear of bodily injury or death to themselves or a member of their family or household and where the defendant's acts caused Victim 1 to suffer serious emotional distress or induced fear in Victim 1 of bodily injury or death to themselves or a member of their family of household, contrary to sec. 940.32(2), 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 4: STALKING**

The above-named defendant between November 1, 2022 through July 14, 2023, in the City of West Bend, Washington County, Wisconsin, did intentionally engage in a course of conduct directed at a specific person to wit: Victim 2, that caused that person and that would cause a reasonable person under the same circumstances to suffer serious emotional distress or to fear bodily injury or death to themselves or to a member of their family or household and where the defendant knew or should have known that at least one of the acts that constituted the course of conduct caused Victim 2 to suffer serious emotional distress or placed Victim 2 in reasonable fear of bodily injury or death to themselves or a member of their family or household and where the defendant's acts caused Victim 2 to suffer serious emotional distress or induced fear in Victim 2 of bodily injury or death to themselves or a member of their family of household, contrary to sec. 940.32(2), 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 5: STALKING**

The above-named defendant between July 28, 2017 and July 14, 2023, Washington County, Wisconsin, did intentionally engage in a course of conduct directed at a specific person to wit: Victim 3, that caused that person and that would cause a reasonable person under the same circumstances to suffer serious emotional distress or to fear bodily injury or death to themselves or to a member of their family or household and where the defendant knew or should have known that at least one of the acts that constituted the course of conduct caused Victim 3 to suffer serious emotional distress or placed Victim 3 in reasonable fear of bodily injury or death to themselves or a member of their family or household and where the defendant's acts caused Victim 3 to suffer serious emotional distress or induced fear in Victim 3 of bodily injury or death to themselves or a member of their family of household, contrary to sec. 940.32(2), 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 6: STALKING**

The above-named defendant between July 28, 2017 through July 14, 2023, in the City of West Bend, Washington County, Wisconsin, did intentionally engage in a course of conduct directed at a specific person to wit: Victim 15, that caused that person and that would cause a reasonable person under the same circumstances to suffer serious emotional distress or to fear bodily injury or death to themselves or to a member of their family or household and where the defendant knew or should have known that at least one of the acts that constituted the course of conduct caused Victim 15 to suffer serious emotional distress or placed Victim 15 in reasonable fear of bodily injury or death to themselves or a member of their family or household and where the defendant's acts caused Victim 15 to suffer serious emotional distress or induced fear in Victim 15 of bodily injury or death to themselves or a member of their family of household, contrary to sec. 940.32(2), 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 7: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between July 28, 2017 through December 31, 2019, in the City of West Bend, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 4, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 8: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between July 28, 2017 through December 31, 2019, in the City of West Bend, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 5, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 9: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between July 28, 2017 through December 31, 2019, in the City of West Bend, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 6, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 10: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between July 28, 2017 through December 31, 2019, in the City of West Bend, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 7, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 11: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between July 28, 2017 through December 31, 2019, in the City of West Bend, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the

consent of the person, to-wit: Victim 8, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 12: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between July 28, 2017 through December 31, 2019, in the City of West Bend, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 9, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 13: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between July 28, 2017 through December 31, 2019, in the City of West Bend, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 10, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between July 28, 2017 through December 31, 2019, in the City of West Bend, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 11, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 15: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between July 28, 2017 through December 31, 2019, in the City of West Bend, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 12, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 16: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between July 28, 2017 through December 31, 2019, in the City of West Bend, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 13, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 17: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between July 28, 2017 through December 31, 2019, in the City of West Bend, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 14, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 18: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between July 28, 2017 through December 31, 2019, in the City of West Bend, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 15, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 19: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between July 28, 2017 through December 31, 2019, in the City of West Bend, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 1, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 20: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person,



to-wit: Victim 16, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 21: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 17, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 22: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 18, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 23: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 19, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 24: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 20, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 25: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 21, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 26: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 22, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 27: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 23, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 28: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 24, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 29: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person,

to-wit: Victim 25, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 30: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 26, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 31: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 27, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 32: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 28, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 33: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 29, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 34: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 30, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 35: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 31, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 36: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 32, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 37: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 33, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 38: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person,

to-wit: Victim 34, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 39: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 35, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 40: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 36, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 41: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 37, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 42: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 38, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 43: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 39, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 44: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 40, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 45: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 41, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 46: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person, to-wit: Victim 42, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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 47: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT**

The above-named defendant between April 1, 2023 and July 14, 2023, in the Town of Polk, Washington County, Wisconsin, did knowingly make a videotape or take a photograph which videotape or photograph depicts an intimate representation without the consent of the person,

to-wit: Victim 43, depicted in the intimate representation, under circumstances where the person so depicted has a reasonable expectation of privacy, contrary to sec. 942.09(2)(am)1, 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.

**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 Washington County Sheriff's Department and bases his information upon his investigation and a review of reports from the Washington County Sheriff's Department and the West Bend Police Department.

The following is a summary of an investigation conducted by the West Bend Police Department and the Washington County Sheriff's Department as it pertains to the conduct of Steven Weis, DOB 09/27/1977, the Defendant. This investigation is active and ongoing.

**Investigation Into Stalking/Conduct at around an Apartment Complex Located on Tamarack Drive in West Bend, Wisconsin**

On June 2, 2023, Officer Lynch of the West Bend Police Department spoke to Victim 1 and her nine-year-old son Victim 2. Victim 1 and Victim 2 are residents at an apartment complex on [REDACTED] in West Bend, Washington County, Wisconsin. Victim 1 had advised her son had made a comment about their neighbor, later identified to be Steven Weis, DOB 09/27/1977, the Defendant, taking pictures of him. The Defendant was determined to reside in an apartment complex at [REDACTED] West Bend. This neighbors Victim 1 and 2's residence, and the two share a parking lot.

Victim 2 described an incident that occurred in November of 2022. Victim 2 was walking towards the west side of the parking lot to throw out garbage. He walked past the Defendant's apartment and saw the Defendant standing within 3 inches of the patio door. The Defendant was naked and facing the lot. The Defendant was moving his right hand up and down on his penis for five seconds. When Victim 1 came outside, the Defendant went back into his apartment. A second incident occurred in wintertime. Victim 1 believed this to be a few weeks apartment from the first incident. Victim 2 said he was exiting the garage and saw the Defendant in his apartment three inches from the patio door. The Defendant was naked. He was holding his penis with his right hand. JE described him pinching his penis with his fingers and moving his hand up and down. Victim 2 said he was uncomfortable seeing this as this was the second time. In a written statement, Victim 2 said he felt bothered by this, that it was weird, and he felt grossed out. He did not give consent to the Defendant to show his penis to him.

Victim 1 said that Victim 2 had also told her that he saw the Defendant taking pictures of him from the Defendant's apartment the last four months. Victim 1 said Victim 2 made a comment about the pictures ten times. Victim 1 saw the Defendant on June 27, 2023 holding a black box near his eye as if he was taking or recording pictures of Victim 2 and thought this behavior was inappropriate. Victim 1 knew the Defendant as she worked with him at Froedtert but in different departments.

On June 12, 2023, Victim 2 was forensically interviewed by Detective Bateman of the West Bend Police Department. When asked why Victim 2 was being interviewed, he stated "a guy

taking pictures of us and raising his penis twice.” Victim 2 said the Defendant was taking pictures with an old-fashioned camera, not a phone. Victim 2 described the Defendant having a patio door which had a screen and other side had blinds. Victim 2 said he saw the Defendant taking pictures 17 or 18 times. When his mom stepped out, the Defendant would move behind the curtains.

Victim 2 described the incident that occurred during the beginning of winter. He observed the Defendant’s penis while the Defendant was standing behind the door. Victim 2 said the Defendant was stroking his penis and it looked like he was squeezing it kind of hard. The Defendant was about a foot behind the screen door. Victim 2 said this made him feel uncomfortable. Victim 2 said there was a different time where this also occurred. The second time was at night. Victim 2 said the second time was exactly the same as the first time. JE said he was getting out of the car when he noticed the Defendant.

On June 21, 2023, Victim 1 contacted Detective Bateman. Victim 1 said a neighbor told her that the Defendant was seen taking pictures of 15-year-old females walking back from the pool. Detective Bateman spoke to a parent who resides in the same complex. She said that her daughter Victim 3, a 15-year-old female, had two friends over after a softball game on June 17, 2023. The three girls then went swimming. While walking back, one of the girls noticed the Defendant in the doorway taking pictures.

Detective Otte spoke with Victim 3. Victim 3 advised it was one of her friends who noticed the Defendant taking a picture of them. Victim 3 said she was wearing a one-piece swimming suit with a towel wrapped around her waist.

On July 14, 2023, Detective Otte spoke with the Defendant at Froedtert Hospital and then later at the West Bend Police Department. The Defendant initially did not know why the police wanted to speak with him. He initially denied taking photographs of juveniles in the parking lot of the apartment complex in which he resided. When asked about masturbating in front of the sliding door, he said it may have been unintentional but never intentional. He did not recall the winter incidents as described by Victim 2. He admitted to having a Cannon 80D camera.

When confronted about how the complainants described his camera, he stated he may have taken some photos in the past. When asked about Victim 3 and her friends walking back from the pool, he stated “yea.” He said the photos would have been taken on his camera. He then said he vaguely remembered this, but then denied taking any pictures.

When asked why he would take pictures of people, he replied, “I’m stupid. Cuz I think they are good looking. I don’t have any interest in them other than they are good looking.” He said he did not have a lot of images of children, but the ones he has are saved to his camera.

The Defendant allowed Detective Otte to review his cellular phone. Detective Otte, in a brief review of his phone, was able to see videos and pictures of the Defendant masturbating about 10-15 feet from the sliding door which overlooks the parking lot where Victim 2, Victim 3, and Victim 3’s friends had their photos taken.

The Defendant said he had taken photographs of people in the parking lot for ten years and had resided at his residence for about fifteen years. The Defendant consented to a search of the electronic devices in his residence. The Defendant took law enforcement back to his



residence so that the search could be conducted. The Defendant showed Detective Otte his laptop and how to access the Defendant's storage server on the laptop.

While searching the storage server, Detective Otte found numerous folders labeled by female names. There was a folder labeled with Victim 1's first name. The folder contained tens of thousands of photographs of Victim 1 going about her normal day. They showed her walking out to or from her car, performing daily tasks, and playing with Victim 2 in the parking lot. They were zoomed in on Victim 1 and Victim 2. There was a file entitled "resume 2017." The Defendant stated he obtained this by accessing Victim 1's profile remotely while at work. There were photographs that appeared to be from a vacation Victim 1 was on. The Defendant stated he obtained the photographs when he helped fix Victim 1's personal computer two years prior. The Defendant later admitted to copying pictures and documents from Victim 1's computer onto his server storage. He admitted to remoting into Victim 1's computer and accessing documents from her work file. He said that he wanted to know about people and was addicted to taking pictures of Victim 1.

There was a folder that had Victim 3's last name as the title. There were thousands of photographs of Victim 3 going about her daily activities including going in and out of her residence, walking from the car, and other photographs. Officer Olson was able to observe a video of Victim 3 that appeared to be taken from the Defendant's apartment. The video was of Victim 3 in her bedroom. Victim 3 was on her phone. The Defendant is heard in the video saying something similar to "mmm yea that's what I like to see," while recording Victim 3 in her room. The Defendant denied having nude pictures of Victim 3. When asked if it was because the situation did not present itself, he said "mostly."

The Defendant later admitted he did not have consent to take the pictures, and that he did not have consent to take any of the pictures that were saved on his server.

Detective Otte reviewed a file named "80D temp." This matched the model of the camera that the Defendant had said he had been using. There were 136 GB of content and four separate folders titled "031923", "042222", "072922", and "091722."

Under "031923", there were 6,532 items. Almost all of them were images of Victim 1, Victim 2, and Victim 3. They were of them engaging in daily activities like taking the garbage out and playing in the parking lot. It appeared the Defendant was taking the photos from his home and the three were outside. There were 46 images of Victim 3 painting her bedroom walls that were captured when Victim 3's window blinds were open.

Under "042222", there were 3,436 items. 3,329 of them captured Victim 1, Victim 2 and Victim 3. There were similar images to the "031923" folder. It appeared the Defendant was tracking the three on a daily basis.

Under "072922", there were two additional folders titled "100CANON" and "101CANON." Under "100CANON", there were 2,146 items. The pictures appeared to capture the daily lives of Victim 1, Victim 2, and Victim 3. Under "101CANON", there were 6,429 items. There were only a handful of images that did not contain Victim 1, Victim 2, and Victim 3. There were six other videos of the Defendant masturbating. In one of the videos, he is observed ejaculating. In other videos, he is observed to wipe pre-ejaculate from the tip of his penis and put it in his mouth.

In a file from the Defendant's desktop titled "Note temp", Detective Otte noted there were 2,328 items (pictures or videos). Detective Otte observed videos of the Defendant masturbating on his couch with the shades partially drawn while Victim 3 was in the parking lot riding a scooter. There are videos of him also masturbating while Victim 1 was outside or arriving home or leaving her residence.

Detective Otte's reports note that Victim 3 was granted a temporary restraining order against the Defendant on July 18, 2023. Detective Otte notes that it is clear Victim 3 and her family are clearly suffering from serious emotional distress based on applying for and getting a restraining order granted. Detective Otte's reports note that any reasonable person would suffer severe emotional distress knowing that their every move was being photographed without their consent. Victim 1 told Detective Otte that she was distraught over the amount of content the Defendant was able to obtain of her and Victim 2.

### **Investigation Into Camera/Conduct at Froedtert West Bend Clinic located at 1700 West Paradise Drive in West Bend, Wisconsin**

As law enforcement continued to conduct a search of the Defendant's computer, Officer Olson came across a photo of a female in a bathroom wearing scrubs. The female appeared to be pulling up or down her underwear. It appeared to be a bathroom hospital. When asked if he had hidden a camera in the bathroom at the Hospital, the Defendant looked down and nodded his head up and down indicating "yes." He pointed to a small camera on the floor in front of the TV.

The Defendant was interviewed further at the West Bend Police Department. The Defendant said he worked for Froedtert since 1995 in IT. He works at the Froedtert West Bend Hospital where he admitted to installing a camera in the bathroom. The Defendant stated that he also used to work at the Froedtert West Bend Clinic located at 1700 W. Paradise Drive in West Bend, Washington County, Wisconsin. The Clinic has since been torn down. He later provided a written statement that he previously had a camera installed at the Clinic location as well. He said that the camera installed at the Clinic was also put in a bathroom. He said he had been recording at the Clinic from about 2015 through 2019. He admitted he never received permission to record any individuals at the Clinic.

Law enforcement conducted a search of the Defendant's residence. They located a safe in the Defendant's bedroom closet. In that safe there were DVDs and other computer backups including hard drives. In one of the safes that the Defendant had, officers located numerous tampons in plastic bags. The bags had a date and initials on them. They were from 2017 and 2015. The Defendant said they "were having a piece of something." The Defendant said the tampons were taken from the West Bend Clinic. Officers also found hair strands secured to paper that were found in a safe. The Defendant said if he found a female attractive and they would exit the bathroom, he would look on the floor for hair strands. He would collect them and bring them home. He said he wanted to "have something of an intimate nature from somebody, that's it. Having something normally won't be able to have."

Law enforcement searched the Defendant's desktop computer. While attempting to locate the Drift files, Detective Goehring located a file named "BHS." Within those files were folders labeled Disc 01 through Disco 06 and a Temp folder. The folders contained videos and still

images from the videos captured at the West Bend Clinic in the City of West Bend. They captured numerous females using the bathroom. Detective Otte noted there were hundreds if not thousands of hidden camera videos. Within each folder, there was an additional folder with female names. In Disc 1, 2, 3, 4, and parts of 5, there were videos from 2015 through 2017. Detective Otte focused on reviewing videos that were within the statute of limitations. Detective Otte located 350 videos within the statute of limitations.

Detective Otte noted that every single video was very similar in nature. A female would enter the bathroom and either pull their pants down or lift up their skirt. They would pull their underwear down, exposing either or both of their buttock/vagina and use the bathroom. They would use the bathroom, and then pull their underwear up. The videos were over a minute long each. The camera appeared to be mounted under the sink facing the toilet area.

Detective Otte reviewed the file labeled with Victim 1's first name. Detective Otte was able to identify Victim 1 in the videos. Victim 1 was shown the video and was able to identify herself by her scrubs and shoes as well as the parts of her body. Victim 1 said she did not give anybody consent to record her while using the bathroom.

Detective Otte spoke with Froedtert representatives and was able to identify an additional employee that was in the videos as Victim 4. There were 37 videos of Victim 4. In the video, a female enters the bathroom wearing scrubs and purple and bright green athletic shoes. Detective Otte was able to speak with Victim 4 about the video. Victim 4 advised she had those shoes. Victim 4 was able to identify herself in the video. She said she did not give anybody permission to record her using the bathroom.

On July 11, 2023, Detective Otte worked with Froedtert representatives to attempt to identify some of the other individuals that had videos taken of them going to the bathroom at the Clinic location. In the content of file name "BHS", there were additional files within that file. In those files there were files with female names in the title. Detective Otte attempted to speak to the victims were had their videos stored under that file/folder. The videos were of females going to the bathroom at the West Bend Clinic.

Detective Otte spoke to Victim 5. The Defendant had a folder with Victim 5's first name. There were 36 videos in that folder that fit within the statute of limitations. The videos showed a female using the bathroom and showing her buttocks and/or vagina. The female had specific tattoos that Detective Otte was able to observe. Victim 5 described tattoos that she had that matched the female that Detective Otte observed in the videos. Victim 5 said she did not consent to anybody capturing videos of her using the bathroom.

On July 24, 2023, Detective Otte was able to follow up with other identified victims. He spoke to Victim 6. Victim 6 confirmed she previously worked at the West Bend Clinic. Detective Otte observed videos dating back to 2015, but five of them were within the statute of limitations. The videos were all in the bathroom and depict Victim 6's vagina or buttocks. Detective Otte showed Victim 6 a brief clip of a video. Victim 6 was able to identify herself. She did not give anybody consent to film her using the bathroom.

Detective Otte spoke with Victim 7. Victim 7 confirmed she previously worked at the Clinic. Detective Otte showed Victim 7 a video clip of a female entering the bathroom. Victim 7 confirmed she was in the video. She did not give consent to anybody to record her using the

bathroom. Detective Otte saw videos dated back to 2015, but 75 videos were within the statute of limitations. All show Victim 7 using the bathroom and depict her buttocks and/or her vagina.

Detective Otte spoke with Victim 8. Victim 8 was shown a brief clip of a video of a female using the bathroom, and confirmed she was the female in the video shown. She was aware of the investigation from coworkers. Victim 8 did not give anybody consent to film her. Detective Otte observed videos going back to 2014. There were 64 videos that fell within the statute of limitations. All videos depict Victim 8's buttocks and/or vagina.

Detective Otte spoke with Victim 9. Victim 9 was shown a clip of a female using the bathroom. Victim 9 confirmed the female in the video was her. She did not give consent to anybody to film her using the bathroom. Detective Otte observed 9 videos related to Victim 9 that were within the statute of limitations. All shows Victim 9's buttocks and/or vagina.

Detective Otte spoke with Victim 10. Victim 10 was shown a brief clip of a video. Victim 10 was also able to identify herself in videos that were captured by a camera installed at the West Bend Clinic. The videos captured Victim 10 using the bathroom. They captured her buttocks and/or vagina. Victim 10 did not consent to being recorded. Detective Otte noted there were 10 videos that fell within the statute of limitations.

Detective Otte spoke with Victim 11. Victim 11 was aware of the investigation. Detective Otte showed Victim 11 a clip of a video. Victim 11 identified the female in the video clip as her. Victim 11 said she did not give anybody consent to film her. Detective Otte observed 9 videos within the statute of limitations. They captured Victim 11's buttocks and/or vagina.

Detective Otte spoke with Victim 12. Detective Otte showed Victim 12 a picture of a tattoo that Detective Otte observed belonging to a female in one the videos. Victim 12 was able to review the tattoo and identified it as belonging to her. Victim 12 did not give anybody consent to capture videos of her using the bathroom. Detective Otte observed there were 69 videos within the statute of limitations. All showed Victim 12's buttocks and/or vagina.

Detective Otte spoke with Victim 13. Victim 13 was aware of the investigation. She said she considered the Defendant a friend and was disgusted. Detective Otte showed Victim 13 one of the video clips. Victim 13 identified the female in the video as herself. Victim 13 said she did not give consent to anybody to film her using the bathroom. Detective Otte observed one video within the statute of limitations. The video depicts Victim 13's buttocks as she was using the bathroom.

Detective Otte spoke with Victim 14. Detective Otte showed Victim 14 one of the video clips. Victim 14 was able to identify herself in the video. Victim 14 did not consent to anybody capturing a video of her using the bathroom. The video captured Victim 14 using the bathroom and captured her buttocks and/or vagina. There were nine videos of Victim 14 within the statute of limitations.

### **Investigation into Conduct at both the Clinic and Hospital**

On July 26, 2023. Detective Otte spoke with Victim 15. Victim 15 advised she had been working with the Defendant as long as she could remember. She said she previously suspected he was taking photos of her. She previously called him out on it, telling him not to

point his phone at her. Victim 15 said he started making her feel uncomfortable when she worked at the Clinic. She had been creeped out by him the last three years. Victim 15 described a situation where the Defendant was holding his phone in her direction. She moved so that a co-worker was in between the two of them. The Defendant changed his position to see her. Victim 15 said she "freaked out" and ran out of the room. Victim 15 said that when she hears his voice it makes her skin crawl.

Detective Otte showed Victim 15 a video of a female walking into the bathroom at the Clinic. Victim 15 identified the female as her. She did not consent to anybody recording her using the bathroom. Detective Otte noted there were 18 videos of Victim 15. They captured Victim 15 using the bathroom and captured her buttocks and/or vagina.

Investigator Hill was able to review content of storage devices from the Defendant's residence. There was a disc labeled "P.I.K. #1" seized from the Defendant's residence. In the folders, there were a multitude of videos that were stored. Under "Note 10 temp", there were videos dated to 2022. In one video, the Defendant is seen rubbing his "pre-cum" on a cashew and string cheese. The Defendant identifies the food as Victim 15's. The video appeared to have taken place at the Hospital. There were also numerous photos that show a male with his penis on a desk phone and in one it shows Victim 15's name. There were videos involving Victim 15 that went back as far as 2008 in a file with Victim 15's name. In several, the Defendant walks up behind a female believed to be Victim 14 stroking the tip of his flaccid and erect penis. Victim 15 was sitting in a chair, facing away from the Defendant as the Defendant stroked his penis less than a foot away from her. There are videos of the Defendant rubbing a bottle of lip gloss, believed to belong to Victim 15, on his erect penis. There are videos of the Defendant rubbing the tip of his penis on the rim of what appeared to be a glass bottle of orange juice that Victim 15 drinks out of. There are videos of the Defendant rubbing the tip of his penis with his fingers and getting a clear liquid substance on them. He is seen walking to Victim 15's desk and rubs the liquid on her mouse and phone. In another video, he rubbed it on the rim of a glass coffee bottle that she drank from. When Victim 15 was told this information, it appeared to Detective Otte that she was going to throw up.

When interviewed, the Defendant admitted to ejaculating on Victim 15's desk, rubbing his penis and pre-ejaculate on her drink containers/other property and walking up to her with his penis exposed through the zipper of his pants. The Defendant admitted all of the videos and photographs were done without individuals knowledge and were taken by him alone. The Defendant said that Victim 15 did catch him taking pictures previously. He thought the first time she caught him was in 2017-2018. He said he thought Victim 15 "was a good looking woman and that's it." He admitted to capturing images of Victim 15 in the bathroom as well as ejaculating on her snacks. He said that he ejaculated on her snacks about a year prior.

In a file from the Defendant's desktop titled "Note temp", Detective Otte noted there were 2,328 items (pictures or videos). There were hundreds of photographs of what appeared to be employees at Froedtert Hospital. They are often of females' breast, buttocks, or vagina when they are clothed. They do not appear to know they are being photographed.



## **Investigation Into Camera/Conduct at Froedtert West Bend Hospital at 3200 West Valley Road in West Bend, Wisconsin**

The Defendant confirmed the hidden camera was installed at the Hospital on Pleasant Valley Road, which is the Froedtert West Bend Hospital located at 3200 Pleasant Valley Road in West Bend, Washington County, Wisconsin. He said the remaining videos and images were stored on his main computer. He said the camera was placed in the bathroom between the hospital and the clinic area.

The Defendant said the camera installed at the Froedtert West Bend Hospital was in the bathroom by the IT offices. The intent was to capture nudity. In a written statement, he said he had the cameras installed for the last three months. This would have been from approximately April of 2023 through July of 2023. He said the files from the camera would be saved on his server on his computer.

The Defendant said the bathroom he installed the camera in at the Hospital was on the garden level. He said it was primarily an employee only bathroom, but that was accessible to the public as well. He was not aware of any images that were not employees. He said the videos and images he saved were of females. He said he did not receive permission to take videos or photos of those individuals.

The Defendant said at the beginning of his shift, he would put the camera up. At the end of shift, he would take it down. The camera he used was a "Drift" brand camera. He said he saved videos that he found attractive. He said the subject needs to be a female, there would be nudity, and if he found the female attractive and peeing, he would save the video. He would delete the videos that he did not like. He said he would masturbate to the images and videos he kept only two to three times a year. He admitted nobody gave him consent to record them in the bathroom.

On July 14, 2023, Detective Edwards assisted other detectives from the Washington County Sheriff's Department in their investigation into the actions of the Defendant. Deputy Edwards received information that the Defendant had been recording individuals using the bathroom on the 1st floor of Froedtert Hospital.

Detective Edwards and Detective Kapla proceeded to the Hospital. They were directed to a bathroom near the IT Office on the first floor of the hospital in between the hospital and clinic. Law enforcement were taken to the Ground Floor close to the IT Department. Detective Edwards located a covert camera inside a bathroom. It was located under the sink in the room. The camera was on, was functioning and facing the toilet. The camera was described as a "Drift" camera. It had Velcro adhesive on it to hold it in place under the sink.

On July 17, 2023, Detective Ball of the Washington County Sheriff's Department was provided a hard drive from Investigator Giese that contained videos and photos discovered on the Defendant's desk top computer by Detective Goehring of the West Bend Police Department. Upon opening the hard drive, Detective Ball found multiple folders. One folder was labeled "ghost x." It contained 20 separate folders "051523, 051723, 051823, 051923, 052223, 052323, 052423, 052523, 060223, 060723, 061323, 062823, 063023, 070323, 070523, 070623, 070723, 071023, 071123." All the folders contained videos of individuals using the toilet in a bathroom. They appeared to be in the same bathroom located at the Hospital in the

Garden level where the Drift camera was seized. The videos were about 29 minutes and 50 seconds each and were a continuous video containing multiple individuals using the toilet depicting nudity of buttocks, genitals, or both.

The folder labeled "done" had 15 folders labeled "040823, 041023, 041123, 041323, 041423, 041723, 042123, 042523, 042823, 050223, 050423, 050523, 050923, 051123, and 051223." Within each were more videos of individuals using the bathroom in the same bathroom on the garden level of the Hospital. The videos depicted nudity of buttocks, genitals, or both.

Law enforcement extracted files from the Defendant's Drift camera taken from the Froedtert bathroom. Detective Ball observed a folder labeled "Drift Camera Files." There were 32 videos. They also depicted individuals using the toilet in the same Garden level bathroom at the Hospital.

Law enforcement worked with representatives of Froedtert Hospital to identify potential victims in the case. Detective Ball reported there were 99 victims as it pertains to the videos at Froedtert Hospital. They were able to name and identify 29 of them. On July 24 and 25, 2023, Deputy Seibel and Deputy Ausloos assisted Detective Ball in contacting victims who were recorded in the bathroom at Froedtert Hospital – West Bend location. The deputies assisted in contacting the victims and interviewing them.

For each victim listed below, the Deputies showed each individual a sanitized photo that was captured from each video footage that the Defendant had in his possession. The photo was presented to the victim. Each victim listed below was able to identify themselves as being in each photo presented to them, and thus being in the videos that the Defendant had of them using the bathroom. Each victim reviewed and confirmed a statement that they were employees at Froedtert Hospital. In the statement, they confirmed that on the dates listed they used the Garden level bathroom at the Froedtert Hospital, that they disrobed partially to use the bathroom, and that they expected privacy in the bathroom. They confirmed that that they did not give permission to be filmed or recorded.

The current list of additional identified victims from the Hospital, date range of videos, and number of videos are as follows:

- Victim 16 – April 8, 2023 through July 11, 2023 – Seven Separate Videos
- Victim 17 – April 10, 2023 through June 7, 2023 – Nine Separate Videos
- Victim 18 – April 14, 2023 through May 18, 2023 – Four Separate Videos
- Victim 19 – April 14, 2023 through July 14, 2023 – Twelve Separate Videos
- Victim 20 – May 5, 2023 through July 7, 2023 – Five Separate Videos
- Victim 21 – June 13, 2023 – One Video
- Victim 22 – May 15, 2023 through July 7, 2023 – Five Separate Videos
- Victim 23 – June 28, 2023 – One Video
- Victim 24 – June 28, 2023 – One Video
- Victim 25 – May 15, 2023 through July 14, 2023 – Two Separate Videos
- Victim 26 – May 25, 2023 through May 22, 2023 – Two Separate Videos
- Victim 27 – May 19, 2023 through May 22, 2023 – Two Separate Videos
- Victim 28 – July 10, 2023 – One Video
- Victim 29 – July 11, 2023 – One Video
- Victim 30 – May 23, 2023 – One Video

- Victim 31 – May 18, 2023 – One Video
- Victim 32 – April 10, 2023 through July 14, 2023 – Fifteen Separate Videos
- Victim 33 – May 12, 2023 through June 7, 2023 – Three Separate Videos
- Victim 34 – June 7, 2023 – One Video
- Victim 35 – June 13, 2023 – One Video
- Victim 36 – June 28, 2023 – One Video
- Victim 37 – June 28, 2023 – One Video
- Victim 38 – May 15, 2023 – Two Separate Videos
- Victim 39 – May 15, 2023 – One Video
- Victim 40 – May 15, 2023 – One Video
- Victim 41 – July 14, 2023 – One Video
- Victim 42 – May 24, 2023 – One Video
- Victim 43 – May 25, 2023 – One Video

The investigation into the identification of other individuals that had their video taken at Froedtert Hospital West Bend is active and ongoing.

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

**Subscribed and sworn to before me on 07/28/23**  
**Electronically Signed By:**  
**Grant D Scaife**  
**Assistant District Attorney**  
**State Bar #: 1099031**

**Electronically Signed By:**  
**Det. Sgt. Donald Kapla**  
**Complainant**