

STATE OF WISCONSIN**CIRCUIT COURT****RACINE COUNTY**

STATE OF WISCONSIN

Plaintiff,

vs.

SHANE M STANGER
701 Mink Ranch Rd #B
Burlington, WI 53105

DOB: 02/28/1975
Sex/Race: M/W
Eye Color: Hazel
Hair Color: Brown
Height: 6 ft 00 in
Weight: 200 lbs

NCIC Name:
Shaen M Stanger

Defendant.

DA Case No.: 2021RA001537
Assigned DA/ADA: Jennifer Tanck Adams
Agency Case No.: 21-010887; 21-0108887
Court Case No.: 2021CF000346
ATN: 52003001132894

2ND AMENDED CRIMINAL COMPLAINT

Status: Status on May 06, 2021 at 10:00 AM
Officer(s) Crystal Venegas # 9475, of the Racine County Sheriff

The defendant did:**Count 1: SECOND DEGREE SEXUAL ASSAULT, DOMESTIC ABUSE - SEXUAL ASSAULT**

The above-named defendant on or about Monday, March 31, 2014, in the Village of Waterford, Racine County, Wisconsin, did have sexual intercourse with JLB, who the defendant knew was unconscious, contrary to sec. 940.225(2)(d), 939.50(3)(c), 968.075(1)(a)3 Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

And further, invoking the provisions of sec. 968.075(1)(a)3 Wis. Stats., because this charge is an act of domestic abuse, costs upon conviction would include the domestic abuse assessment imposed under sec. 973.055(1) Wis. Stats.

Count 2: SECOND DEGREE SEXUAL ASSAULT, DOMESTIC ABUSE - SEXUAL ASSAULT

The above-named defendant on or about Saturday, May 10, 2014, in the Village of Waterford, Racine County, Wisconsin, did have sexual contact with JLB, who the defendant knew was unconscious, contrary to sec. 940.225(2)(d), 939.50(3)(c), 968.075(1)(a)3 Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

And further, invoking the provisions of sec. 968.075(1)(a)3 Wis. Stats., because this charge is an act of domestic abuse, costs upon conviction would include the domestic abuse assessment imposed under sec. 973.055(1) Wis. Stats.

Count 3: SECOND DEGREE SEXUAL ASSAULT, DOMESTIC ABUSE ASSESSMENTS

The above-named defendant Nov. 2015 - April 2019, in the Village of Waterford, Racine County, Wisconsin, did have sexual intercourse with JLB, who the defendant knew was unconscious, contrary to sec. 940.225(2)(d), 939.50(3)(c), 973.055(1)(b) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

And further, invoking the provisions of sec. 973.055(1)(b) Wis. Stats., because this charge is an act of domestic abuse, and further, invoking the provisions of sec. 973.055(1) Wis. Stats., the court shall impose the domestic abuse assessment of \$100 upon conviction under sec. 813.12 (8)(a), Wis. Stats..

Count 4: SECOND DEGREE SEXUAL ASSAULT, DOMESTIC ABUSE ASSESSMENTS

The above-named defendant Nov. 2015 - April 2019, in the Village of Waterford, Racine County, Wisconsin, did have sexual intercourse with JLB, who the defendant knew was unconscious, contrary to sec. 940.225(2)(d), 939.50(3)(c), 973.055(1) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

And further, invoking the provisions of sec. 973.055(1) Wis. Stats., because this charge is an act of domestic abuse, and further, invoking sec. 973.055(1), Wis. Stats., the court shall impose the domestic abuse assessment of \$100 for this offense because this charge is an enumerated crime under sec. 973.055(1)(a)1, Wis. Stats., and the conduct constituting the violation involved an act by the defendant against his or her spouse, against an adult with whom the defendant resides or formerly resided, or against an adult with whom the defendant has created a child.

Count 5: SECOND DEGREE SEXUAL ASSAULT, DOMESTIC ABUSE ASSESSMENTS

The above-named defendant Nov. 2015 - April 2019, in the Village of Waterford, Racine County, Wisconsin, did have sexual intercourse with JLB, who the defendant knew was unconscious, contrary to sec. 940.225(2)(d), 939.50(3)(c), 973.055(1) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

And further, invoking the provisions of sec. 973.055(1) Wis. Stats., because this charge is an act of domestic abuse, and further, invoking sec. 973.055(1), Wis. Stats., the court shall impose the domestic abuse assessment of \$100 for this offense because this charge is an enumerated crime under sec. 973.055(1)(a)1, Wis. Stats., and the conduct constituting the violation involved an act by the defendant against his or her spouse, against an adult with whom the defendant resides or formerly resided, or against an adult with whom the defendant has created a child.

Count 6: SECOND DEGREE SEXUAL ASSAULT, DOMESTIC ABUSE ASSESSMENTS

The above-named defendant Nov. 2015 - April 2019, in the Village of Waterford, Racine County, Wisconsin, did have sexual intercourse with JLB, who the defendant knew was unconscious, contrary to sec. 940.225(2)(d), 939.50(3)(c), 973.055(1) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

And further, invoking the provisions of sec. 973.055(1) Wis. Stats., because this charge is an act of domestic abuse, and further, invoking sec. 973.055(1), Wis. Stats., the court shall impose the domestic

abuse assessment of \$100 for this offense because this charge is an enumerated crime under sec. 973.055(1)(a)1, Wis. Stats., and the conduct constituting the violation involved an act by the defendant against his or her spouse, against an adult with whom the defendant resides or formerly resided, or against an adult with whom the defendant has created a child.

Count 7: SECOND DEGREE SEXUAL ASSAULT, DOMESTIC ABUSE ASSESSMENTS

The above-named defendant Nov. 2015 - April 2019, in the Village of Waterford, Racine County, Wisconsin, did have sexual intercourse with JLB, who the defendant knew was unconscious, contrary to sec. 940.225(2)(d), 939.50(3)(c), 973.055(1) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

And further, invoking the provisions of sec. 973.055(1) Wis. Stats., because this charge is an act of domestic abuse, and further, invoking sec. 973.055(1), Wis. Stats., the court shall impose the domestic abuse assessment of \$100 for this offense because this charge is an enumerated crime under sec. 973.055(1)(a)1, Wis. Stats., and the conduct constituting the violation involved an act by the defendant against his or her spouse, against an adult with whom the defendant resides or formerly resided, or against an adult with whom the defendant has created a child.

Count 8: SECOND DEGREE SEXUAL ASSAULT, DOMESTIC ABUSE ASSESSMENTS

The above-named defendant Nov. 2015 - April 2019, in the Village of Waterford, Racine County, Wisconsin, did have sexual intercourse with JLB, who the defendant knew was unconscious, contrary to sec. 940.225(2)(d), 939.50(3)(c), 973.055(1) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

And further, invoking the provisions of sec. 973.055(1) Wis. Stats., because this charge is an act of domestic abuse, and further, invoking sec. 973.055(1), Wis. Stats., the court shall impose the domestic abuse assessment of \$100 for this offense because this charge is an enumerated crime under sec. 973.055(1)(a)1, Wis. Stats., and the conduct constituting the violation involved an act by the defendant against his or her spouse, against an adult with whom the defendant resides or formerly resided, or against an adult with whom the defendant has created a child.

Count 9: SECOND DEGREE SEXUAL ASSAULT, DOMESTIC ABUSE ASSESSMENTS

The above-named defendant Nov. 2015 - April 2019, in the Village of Waterford, Racine County, Wisconsin, did have sexual intercourse with JLB, who the defendant knew was unconscious, contrary to sec. 940.225(2)(d), 939.50(3)(c), 973.055(1) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

And further, invoking the provisions of sec. 973.055(1) Wis. Stats., because this charge is an act of domestic abuse, and further, invoking sec. 973.055(1), Wis. Stats., the court shall impose the domestic abuse assessment of \$100 for this offense because this charge is an enumerated crime under sec. 973.055(1)(a)1, Wis. Stats., and the conduct constituting the violation involved an act by the defendant against his or her spouse, against an adult with whom the defendant resides or formerly resided, or against an adult with whom the defendant has created a child.

Count 10: SECOND DEGREE SEXUAL ASSAULT, DOMESTIC ABUSE ASSESSMENTS

The above-named defendant Nov. 2015 - April 2019, in the Village of Waterford, Racine County, Wisconsin, did have sexual intercourse with JLB, who the defendant knew was unconscious, contrary to sec. 940.225(2)(d), 939.50(3)(c), 973.055(1) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

And further, invoking the provisions of sec. 973.055(1) Wis. Stats., because this charge is an act of domestic abuse, and further, invoking sec. 973.055(1), Wis. Stats., the court shall impose the domestic abuse assessment of \$100 for this offense because this charge is an enumerated crime under sec. 973.055(1)(a)1, Wis. Stats., and the conduct constituting the violation involved an act by the defendant against his or her spouse, against an adult with whom the defendant resides or formerly resided, or against an adult with whom the defendant has created a child.

Count 11: CAPTURE AN IMAGE OF NUDITY WITHOUT CONSENT

The above-named defendant 07/19/2015-03/25/2018, in the Village of Waterford, Racine County, Wisconsin, did knowingly make a videotape which videotape depicts nudity, without the knowledge and consent of the person depicted nude 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 IMAGE OF NUDITY WITHOUT CONSENT

The above-named defendant 07/19/2015-03/25/2018, in the Village of Waterford, Racine County, Wisconsin, did knowingly make a videotape which videotape depicts nudity, without the knowledge and consent of the person depicted nude 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 IMAGE OF NUDITY WITHOUT CONSENT

The above-named defendant 07/19/2015-03/25/2018, in the Village of Waterford, Racine County, Wisconsin, did knowingly make a videotape which videotape depicts nudity, without the knowledge and consent of the person depicted nude 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 IMAGE OF NUDITY WITHOUT CONSENT

The above-named defendant 07/19/2015-03/25/2018, in the Village of Waterford, Racine County, Wisconsin, did knowingly make a videotape which videotape depicts nudity, without the knowledge and consent of the person depicted nude 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 IMAGE OF NUDITY WITHOUT CONSENT

The above-named defendant 07/19/2015-03/25/2018, in the Village of Waterford, Racine County, Wisconsin, did knowingly make a videotape which videotape depicts nudity, without the knowledge and consent of the person depicted nude 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 IMAGE OF NUDITY WITHOUT CONSENT

The above-named defendant 07/19/2015-03/25/2018, in the Village of Waterford, Racine County, Wisconsin, did knowingly make a videotape which videotape depicts nudity, without the knowledge and consent of the person depicted nude 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 IMAGE OF NUDITY WITHOUT CONSENT

The above-named defendant 07/19/2015-03/25/2018, in the Village of Waterford, Racine County, Wisconsin, did knowingly make a videotape which videotape depicts nudity, without the knowledge and consent of the person depicted nude 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 IMAGE OF NUDITY WITHOUT CONSENT

The above-named defendant 07/19/2015-03/25/2018, in the Village of Waterford, Racine County, Wisconsin, did knowingly take a photograph which photograph depicts nudity, without the knowledge and consent of the person depicted nude 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 IMAGE OF NUDITY WITHOUT CONSENT

The above-named defendant 07/19/2015-03/25/2018, in the Village of Waterford, Racine County, Wisconsin, did knowingly take a photograph which photograph depicts nudity, without the knowledge and consent of the person depicted nude 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 IMAGE OF NUDITY WITHOUT CONSENT

The above-named defendant 07/19/2015-03/25/2018, in the Village of Waterford, Racine County, Wisconsin, did knowingly take a photograph which photograph depicts nudity, without the knowledge and consent of the person depicted nude 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 IMAGE OF NUDITY WITHOUT CONSENT

The above-named defendant 07/19/2015-03/25/2018, in the Village of Waterford, Racine County, Wisconsin, did knowingly take a photograph which photograph depicts nudity, without the knowledge and consent of the person depicted nude 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 04/01/2019-06/09/2020, in the Town of Rochester, Racine 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: JLB, 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 04/01/2019-06/09/2020, in the Town of Rochester, Racine 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: JLB, 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 04/01/2019-06/09/2020, in the Town of Rochester, Racine 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: JLB, 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 04/01/2019-06/09/2020, in the Town of Rochester, Racine 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: JLB, 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 IMAGE OF NUDITY WITHOUT CONSENT

The above-named defendant 04/01/2019-06/09/2020, in the Town of Rochester, Racine County, Wisconsin, did knowingly make a videotape which videotape depicts nudity, without the knowledge and consent of the person depicted nude 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: INVASION OF PRIVACY

The above-named defendant 01/14/2018-03/25/2018, Racine County, Wisconsin, , contrary to sec. 942.08(2), 939.51(3)(a) Wis. Stats., a Class A Misdemeanor, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 28: INVASION OF PRIVACY

The above-named defendant Nov. 2015 - April 2019, in the Village of Waterford, Racine County, Wisconsin, , contrary to sec. 942.08(2), 939.51(3)(a) Wis. Stats., a Class A Misdemeanor, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 29: INVASION OF PRIVACY

The above-named defendant Nov. 2015 - April 2019, in the Village of Waterford, Racine County, Wisconsin, , contrary to sec. 942.08(2), 939.51(3)(a) Wis. Stats., a Class A Misdemeanor, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 30: INVASION OF PRIVACY

The above-named defendant Nov. 2015 - April 2019, in the Village of Waterford, Racine County, Wisconsin, , contrary to sec. 942.08(2), 939.51(3)(a) Wis. Stats., a Class A Misdemeanor, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 31: INVASION OF PRIVACY

The above-named defendant Nov. 2015 - April 2019, in the Village of Waterford, Racine County, Wisconsin, , contrary to sec. 942.08(2), 939.51(3)(a) Wis. Stats., a Class A Misdemeanor, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 32: INVASION OF PRIVACY

The above-named defendant Nov. 2015 - April 2019, in the Village of Waterford, Racine County, Wisconsin, , contrary to sec. 942.08(2), 939.51(3)(a) Wis. Stats., a Class A Misdemeanor, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 33: INVASION OF PRIVACY

The above-named defendant 04/01/2019-06/09/2020, in the Town of Rochester, Racine County, Wisconsin, did knowingly install or use any device, instrument, mechanism, or contrivance to intentionally view, broadcast, or record under the outer clothing of an individual that individual's genitals, pubic area, breast, or buttocks, including genitals, pubic area, breasts, or buttocks that are covered by undergarments, or to intentionally view, broadcast, or record a body part of an individual that is not otherwise visible, without that

individual's consent, contrary to sec. 942.08(3), 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: INVASION OF PRIVACY

The above-named defendant 04/01/2019-06/09/2020, in the Town of Rochester, Racine County, Wisconsin, did knowingly install or use any device, instrument, mechanism, or contrivance to intentionally view, broadcast, or record under the outer clothing of an individual that individual's genitals, pubic area, breast, or buttocks, including genitals, pubic area, breasts, or buttocks that are covered by undergarments, or to intentionally view, broadcast, or record a body part of an individual that is not otherwise visible, without that individual's consent, contrary to sec. 942.08(3), 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: INVASION OF PRIVACY

The above-named defendant 04/01/2019-06/09/2020, in the Town of Rochester, Racine County, Wisconsin, did knowingly install or use any device, instrument, mechanism, or contrivance to intentionally view, broadcast, or record under the outer clothing of an individual that individual's genitals, pubic area, breast, or buttocks, including genitals, pubic area, breasts, or buttocks that are covered by undergarments, or to intentionally view, broadcast, or record a body part of an individual that is not otherwise visible, without that individual's consent, contrary to sec. 942.08(3), 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: INVASION OF PRIVACY

The above-named defendant 04/01/2019-06/09/2020, in the Town of Rochester, Racine County, Wisconsin, did knowingly install or use any device, instrument, mechanism, or contrivance to intentionally view, broadcast, or record under the outer clothing of an individual that individual's genitals, pubic area, breast, or buttocks, including genitals, pubic area, breasts, or buttocks that are covered by undergarments, or to intentionally view, broadcast, or record a body part of an individual that is not otherwise visible, without that individual's consent, contrary to sec. 942.08(3), 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: INVASION OF PRIVACY

The above-named defendant 04/01/2019-06/09/2020, in the Town of Rochester, Racine County, Wisconsin, did knowingly install or use any device, instrument, mechanism, or contrivance to intentionally view, broadcast, or record under the outer clothing of an individual that individual's genitals, pubic area, breast, or buttocks, including genitals, pubic area, breasts, or buttocks that are covered by undergarments, or to intentionally view, broadcast, or record a body part of an individual that is not otherwise visible, without that individual's consent, contrary to sec. 942.08(3), 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: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on or about Sunday, February 28, 2021, in the Village of Rochester, Racine County, Wisconsin, did, having attained the age of 18, knowingly possess videotape(s) of a child engaging

in sexually explicit conduct, and knew 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 39: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on or about Sunday, February 28, 2021, in the Village of Rochester, Racine County, Wisconsin, did, having attained the age of 18, knowingly possess videotape(s) of a child engaging in sexually explicit conduct, and knew 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 40: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on or about Sunday, February 28, 2021, in the Village of Rochester, Racine County, Wisconsin, did, having attained the age of 18, knowingly possess motion picture(s) of a child engaging in sexually explicit conduct, and knew 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 41: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on or about Sunday, February 28, 2021, in the Village of Rochester, Racine County, Wisconsin, did, having attained the age of 18, knowingly possess motion picture(s) of a child engaging in sexually explicit conduct, and knew 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 42: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on or about Sunday, February 28, 2021, in the Village of Rochester, Racine County, Wisconsin, did, having attained the age of 18, knowingly possess motion picture(s) of a child engaging in sexually explicit conduct, and knew 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 43: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant on or about Sunday, February 28, 2021, in the Village of Rochester, Racine County, Wisconsin, did, having attained the age of 18, knowingly possess motion picture(s) of a child engaging in sexually explicit conduct, and knew 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 44: INVASION OF PRIVACY

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine County, Wisconsin, did knowingly install or use any device, instrument, mechanism, or contrivance to intentionally view, broadcast, or record under the outer clothing of an individual that individual's genitals, pubic area, breast, or buttocks, including genitals, pubic area, breasts, or buttocks that are covered by undergarments, or to intentionally view, broadcast, or record a body part of an individual that is not otherwise visible, without that individual's consent, contrary to sec. 942.08(3), 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: INVASION OF PRIVACY

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine County, Wisconsin, did knowingly install or use any device, instrument, mechanism, or contrivance to intentionally view, broadcast, or record under the outer clothing of an individual that individual's genitals, pubic area, breast, or buttocks, including genitals, pubic area, breasts, or buttocks that are covered by undergarments, or to intentionally view, broadcast, or record a body part of an individual that is not otherwise visible, without that individual's consent, contrary to sec. 942.08(3), 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: INVASION OF PRIVACY

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine County, Wisconsin, did knowingly install or use any device, instrument, mechanism, or contrivance to intentionally view, broadcast, or record under the outer clothing of an individual that individual's genitals, pubic area, breast, or buttocks, including genitals, pubic area, breasts, or buttocks that are covered by undergarments, or to intentionally view, broadcast, or record a body part of an individual that is not otherwise visible, without that individual's consent, contrary to sec. 942.08(3), 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: INVASION OF PRIVACY

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine County, Wisconsin, did knowingly install or use any device, instrument, mechanism, or contrivance to intentionally view, broadcast, or record under the outer clothing of an individual that individual's genitals, pubic area, breast, or buttocks, including genitals, pubic area, breasts, or buttocks that are covered by undergarments, or to intentionally view, broadcast, or record a body part of an individual that is not otherwise visible, without that individual's consent, contrary to sec. 942.08(3), 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 48: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)

The above-named defendant 02/01/2020-03/01/2021, in the Town of Dover, Racine 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 49: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)

The above-named defendant 02/01/2020-03/01/2021, in the Town of Dover, Racine 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 50: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)

The above-named defendant 02/01/2020-03/01/2021, in the Town of Dover, Racine 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 51: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine 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 52: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine 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 53: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine 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 54: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine 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 55: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine 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 56: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)

The above-named defendant 02/01/2020-03/01/2021, in the Town of Dover, Racine 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 57: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)

The above-named defendant 02/01/2020-03/01/2021, in the Town of Dover, Racine 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 58: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)

The above-named defendant 02/01/2020-03/01/2021, in the Town of Dover, Racine 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 59: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine 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 60: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine 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 61: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine 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 62: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)

The above-named defendant 02/01/2020-03/01/2021, in the Town of Dover, Racine 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 63: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine 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: Rebecca M Sheen, 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 64: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT

The above-named defendant 02/01/2020-03/01/2021, in the Town of Dover, Racine 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: RMS, 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 65: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine 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: Rebecca M Sheen, 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 66: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine 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: JLM, 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 67: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine 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: ELB, a person under the age of 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 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 68: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine 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: ELB, a person under the age of 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 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 69: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant 02/01/2020-03/01/2021, in the Town of Dover, Racine 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: JGH, a person under the age of 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 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 70: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant 02/01/2020-03/01/2021, in the Town of Dover, Racine 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: JGH, a person under the age of 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 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 71: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant 02/01/2020-03/01/2021, in the Town of Dover, Racine 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: JGH, a person under the age of 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 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 72: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant 02/01/2020-03/01/2021, in the Town of Dover, Racine 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: JGH, a person under the age of 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 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 73: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant 02/01/2020-03/01/2021, in the Town of Dover, Racine 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: JGH, a person under the age of 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 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 74: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine 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: JMA, a person under the age of 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 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 75: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant 02/01/2020-03/01/2021, in the Town of Dover, Racine 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: JMA, a person under the age of 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 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 76: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine 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: TRB, a person under the age of 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 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 77: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant between February 19, 2020 through March 1, 2021, in the Town of Dover, Racine 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: TRB, a person under the age of 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 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 78: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant 02/01/2020-03/01/2021, in the Town of Dover, Racine 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: MRO, a person under the age of 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 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 79: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant 02/01/2020-03/01/2021, in the Town of Dover, Racine 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: MRO, a person under the age of 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 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 80: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant 02/01/2020-03/01/2021, in the Town of Dover, Racine 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: MRO, a person under the age of 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 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 81: CAPTURE AN INTIMATE REPRESENTATION WITHOUT CONSENT (VICTIM UNDER AGE 18)

The above-named defendant 02/01/2020-03/01/2021, in the Town of Dover, Racine 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: MRO, a person under the age of 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 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 82: STALKING

The above-named defendant between March 1, 2021 through April 5, 2021, in the Town of Rochester, Racine County, Wisconsin, did intentionally engage in a course of conduct directed at a specific person, JLB, 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 JLB to suffer serious emotional distress or placed JLB 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 JLB to suffer serious emotional distress or induced fear in JLB 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 83: FELONY INTIMIDATION OF A VICTIM

The above-named defendant between March 1, 2021 through April 5, 2021, in the Town of Rochester, Racine County, Wisconsin, knowingly and maliciously did attempt to dissuade JLB, who has been the victim of a crime, where the act is accompanied by force or violence or attempted force or violence, contrary to sec. 940.45(1), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

Count 84: FELONY INTIMIDATION OF A VICTIM

The above-named defendant 03/01/2021-04/22/2021, in the City of Racine, Racine County, Wisconsin, knowingly and maliciously did attempt to dissuade MR, who has been the victim of a crime, in the State of Iowa where he recorded her unconscious while he sexually assaulted her, where the act is accompanied by any express or implied threat of force, violence, injury or damage, contrary to sec. 940.45(3), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

The official records and files of the Racine County District Attorney's Office, the Wisconsin Department of Justice and/or Department of Transportation reflect that the defendant has the following record of convictions:

05/26/2010 Disorderly Conduct Forest 10CM26

03/04/2001 - 07/31/2001 OWI 2nd Iowa

03/22/1999 - 06/02/1999 OWI 1st Iowa

The complainant, being first duly sworn on oath, on information and belief, alleges and states that in the County of Racine, State of Wisconsin, the defendant did commit the above described offense(s) and prays that said defendant be dealt with according to the laws of the State of Wisconsin.

The complainant states that he is an adult citizen and has reviewed the official law enforcement reports prepared under the above mentioned complaint numbers by the above stated officer(s), whose reports your complainant relies upon as truthful and accurate inasmuch as they were prepared during the course of an official law enforcement investigation. The complainant relies upon the statements of the mentioned witnesses inasmuch as they are citizens and their statements are based on personal knowledge

or eyewitness observations; the complainant relies upon the statements of the defendant, if any, inasmuch as they are contrary to the defendant's penal interests and are, therefore, to be believed.

The complainant thereby informs the court that the basis for the above charge(s) is as follows:

Dep. Venegas of the Racine County Sheriff's Office reports that on February 28, 2021, she was dispatched to a residence in the Village of Rochester for a report of a sexual assault. The alleged victim, identified as JB, stated that she had found videos on a laptop belonging to her ex-boyfriend, identified as Shane STANGER, which showed STANGER repeatedly sexually assaulting her without her consent. JB stated these videos were from 2015 to the present and the assaults would have taken place at her residence in the Village of Waterford, Count of Racine, State of Wisconsin.

Dep. Venegas reports that upon making contact with JB, JB stated that she believed that STANGER had been drugging her and sexually assaulting her in her sleep. JB stated she did not take any medications that would prevent her from waking up and she has no recollection of the assaults shown on the video recordings she discovered. JB stated she did recognize herself and STANGER in the videos as well as the sheets on their bed. JB stated she also has two children with STANGER but they have not been romantically involved since 2015, making this a domestic incident. JB then provided to Dep. Venegas a flash drive on which JB saved the videos she observed on STANGER's computer.

Dep. Venegas reports that she viewed the videos contained on the flash driver. In the videos, it appeared that STANGER is doing the camera work as he performed sexual acts on JB.

J.B. stated regarding the below mentioned conduct that at no time did she consent to be drugged, engage in any kind of sexual contact in an unconscious condition, to include, but not limited to; anal sex, digital anal penetration, or anal penetration with any object. J.B. also stated she didn't consent at anytime during the relationship to be video recorded and those videos to be stored.

COUNTS 1-10 2nd Degree Sexual Assault of an Unconscious Victim (Domestic Abuse)

J.B. indicates that in November 2015 she moved to the Village of Waterford, Racine County, WI address. She lived there until April 2019. In reviewing Stanger's laptop and cellphone, Inv. A. Sparks advises on 10 occasions between November 2015 and April 30, 2019, Stanger had sexual contact or intercourse with J.B. while she was unconscious at her Village of Waterford address. Having reviewed the videos, Inv. Sparks advises J.B. was unconscious in the videos because of J.B.'s snoring respirations, little to no response to any of Stanger's repeated assaults and J.B. only responding to painful stimuli, as well as no physical response at all when being physically moved by Stanger. In the below videos Stanger is referred to as "SS" and the victim as "J.B."

Video 0000102 from offense date 11/11/2015 recorded at Waterford, Racine Co address

Video duration: 03:43

00:32 - SS physically moves JB

00:45 - JB comes out of position to the side

01:29 - SS physically moves JB

01:50 - Snoring heard

02:01 - SS digitally penetrates JB anally **(COUNT 1)**

02:13 - JB moves

02:21 - SS shoves a pillow underneath JB

02:55 - SS applies lube to JB's anus

03:06 - JB rolls over

03:15 - SS covers JB's face

Video 110181 from offense date 01/14/2018 recorded at Waterford, Racine Co address

Video duration: 19:30

00:18 - SS physically moves body

01:18 - SS penetrates JB anally with sex toy **(COUNT 3)**

03:01 - Snoring heard, JB moves

07:31 - SS penetrates JB anally with his penis, snoring heard **(COUNT 4)**

07:55 - JB moves

08:25 - JB moves

08:26 - SS penetrates JB anally with his penis **(COUNT 5)**

08:47 - JB moves

09:14 - SS penetrates JB anally with sex toy **(COUNT 6)**

09:16 - JB moves

09:31 - SS penetrates JB anally with sex toy, snoring heard **(COUNT 7)**

10:12 - JB moves

13:05 - SS moves camera to capture JB's entire body as she sleeps on her right side

13:19 - SS removes white blanket and is standing over her masturbating

14:59 - Child can be heard in background crying

15:15 - SS tells child, "Stop crying right now."

18:16 - SS straddles JB and ejaculates into her mouth, JB never moves from this position **(COUNT 8)**

Inv. Sparks had an opportunity to view the interior of the Waterford residence and was able to see identifiers in the room that correspond with the video that are articulated in his report.

jbyznugy0 Video duration: 01:16 from offense date 03/19/2018

00:00 - JB's vagina exposed, SS touching leg

00:18 - SS moves JB's limp arm

jbyzo41g0 Video duration: 01:22 from offense date 03/19/2018

JB's pubic area exposed

jcm6j7r20 Video duration: 19:30 from offense date 03/25/2018

00:05 - JB's buttocks exposed and vagina

00:20 - SS physically moving

jcm6j7r201 Video duration: 19:30 from offense date 03/19/2018

Video has same content prior to this 00:27 - SS digitally penetrates JB anally **(COUNT 9)**

jcm6j7r209 Video duration: 19:30 from offense date 03/21/2018

Video has same content prior to this 01:19 - SS penetrates JB anally with sex toy **(COUNT 10)**

COUNTS 11-21 Representations Depicting Nudity

Occurred from 07/19/2015 to 03/25/2018, on 11 separate occasions Stanger recorded JB at her Waterford address using a camera and subsequently transferred the video files to his laptop and cellphone, again without J.B.'s consent to recording her. Because those same 11 separate occasions being 11 separate files that depict J.B. in a nude state, either exposing her buttocks, public area, anus, or breasts without consent, he both captured her image of nudity without her consent, as well as invaded her privacy without her consent as noted below.

Above described video 0000102 from offense date 11/11/2015 **(COUNT 11)**

Video duration: 03:43

2nd Sexual Assault described above in Counts 1 - 2

Above described video 110181 from offense date 01/14/2018 **(COUNT 12)**

Video duration: 19:30

2nd Degree Sexual Assault as described above in Counts 3 – 8

jbyznugy0 Video duration: 01:16 from offense date 03/19/2018 **(COUNT 13)**

00:00 - JB's vagina exposed, SS touching leg

00:18 - SS moves JB's limp arm

jbyzo41g0 Video duration: 01:22 from offense date 03/19/2018 **(COUNT 14)**

JB's pubic area exposed

jcm6j7r20 Video duration: 19:30 from offense date 03/25/2018 **(COUNT 15)**

00:05 - JB's buttocks exposed and vagina

00:20 - SS physically moving

jcm6j7r201 Video duration: 19:30 from offense date 03/19/2018 **(COUNT 16)**

Video has same content prior to this 00:27 - SS digitally penetrates JB anally

jcm6j7r209 Video duration: 19:30 from offense date 03/21/2018 **(COUNT 17)**

Video has same content prior to this 01:19 - SS penetrates JB anally with sex toy

jc5p2vt90 Date: 07/19/2015 05:46:58 a.m. **(COUNT 18)**

Description: Photo depicts the lower portion of nude female. The mole that identifies J.B. is present and her pubic area is exposed.

k93i3um20 Date: 07/19/2015 05:49:19 a.m. **(COUNT 19)**

Description: Photo depicts the lower portion of nude female based on timing of the above count the image is believed to be of J.B.

jc5p2vtr0 Date: 08/07/2015 06:17:45 a.m. **(COUNT 20)**

Description: Photo depicts a partially nude female laying prone on a brown stripped sheet. Buttocks and vagina are exposed. There also appears to be another person lying next to the victim who is believed to be J.B. because J.B. informed that it was common for her daughter to sleep in bed with her and Stanger would remove the daughter and put her on the living room couch. In a previous video Stanger can be heard telling a child to stop crying.

jc5p2vte0 Date: 08/07/2015 06:21:29 a.m. **(COUNT 21)**

Description: Photo depicts a partially nude female laying prone on a brown stripped sheet. Buttocks and vagina are exposed. The person that was lying next to the victim has now been moved or is out of frame. Based on Count 20's description, it is believed to be JB that is the female with her private areas exposed.

COUNTS 22-26 Representations Depicting Nudity

Occurred on 6/09/2020, on 5 separate occasions in the Village of Rochester address, Racine County, WI, wherein Stanger again captured J.B. in a nude state, either exposing her buttocks, public area, anus, or breasts without consent, as well as invaded her privacy without her consent by intentionally viewing those nude areas of her body without her consent as noted below.

kb7vae1s0.vdata_embedded_1 Date: 06/09/2020 06:03:36 a.m. **(COUNT 22)**

Description: Photo depicts a nude female laying on her back. The photo shows the exposed breasts and a partial view of the pubic area. J.B. has a tattoo of her name on her left breast and the "J" and part of an "A" are visible.

kb7vaeuc0.vdata_embedded_1 Date: 06/09/2020 06:03:43 a.m. **(COUNT 23)**

Description: Photo depicts a nude female laying on her back. The photo depicts the exposed pubic area, the lower portion of the right breast is exposed. Everything in the background matches the previous photo and appears to part of series of photos taken of the victim based on the time and continuation.

kb7vaf8m0.vdata_embedded_1 Date: 06/09/2020 06:03:48 a.m. **(COUNT 24)**

Description: Photo depicts a nude female laying on her back. The photo depicts the exposed pubic area, left and right breast is exposed. Again, everything in the background matches the previous two photos.

kb7vafh80.vdata_embedded_1 Date: 06/09/2020 06:03:55 a.m. **(COUNT 25)**

Description: Photo depicts a close up shot of a female exposed pubic area. A small section of the photo the same brown sheets can be seen underneath the body as are seen in the previous photos.

kb7vafvz0.vdata_embedded_1 Date: 06/09/2020 06:04:00 a.m. **(COUNT 26)**

Description: Photo depicts a close up shot of a female exposed pubic area. It is slightly further away than the previous photo and the same brown sheets and part of the gray and white blanket that is shown in the previous photos can be seen.

COUNTS 27-32 Invasion of Privacy

Occurred from 01/14/2018 to 03/25/2018, on 6 separate occasions Stanger recorded JB at her Waterford address, Racine County, WI using a camera and subsequently transferred the video files to his laptop and cellphone, again without J.B.'s consent to recording her. Because of those same 11 separate occasions being 11 separate files that depict J.B. in a nude state, either exposing her buttocks, public area, anus, or breasts without consent, he both captured her image of nudity without her consent, as well as invaded her privacy without her consent as noted below.

110181 from offense date 01/14/2018 **(COUNT 27)**

Video duration: 19:30

2nd Degree Sexual Assault as described above in Counts 3 – 7

jbyznugy0 Video duration: 01:16 from offense date 03/19/2018 **(COUNT 28)**

00:00 - JB's vagina exposed, SS touching leg

00:18 - SS moves JB's limp arm

jbyzo41g0 Video duration: 01:22 from offense date 03/19/2018 **(COUNT 29)**

JB's pubic area exposed

jcm6j7r20 Video duration: 19:30 from offense date 03/25/2018 **(COUNT 30)**

00:05 - JB's buttocks exposed and vagina

00:20 - SS physically moving

jcm6j7r201 Video duration: 19:30 from offense date 03/19/2018 **(COUNT 31)**

Video has same content prior to this 00:27 - SS digitally penetrates JB anally

jcm6j7r209 Video duration: 19:30 from offense date 03/21/2018 **(COUNT 32)**

Video has same content prior to this 01:19 - SS penetrates JB anally with sex toy

COUNTS 33-37 Invasion of Privacy

Occurred on 6/09/2020, on 5 separate occasions in the Village of Rochester address wherein Stanger again captured J.B. in a nude state, either exposing her buttocks, public area, anus, or breasts without consent, as well as invaded her privacy without her consent by intentionally viewing those nude areas of her body without her consent.

kb7vae1s0.vdata_embedded_1 Date: 06/09/2020 06:03:36 a.m. **(COUNT 33)**

Description: Photo depicts a nude female laying on her back. The photo shows the exposed breasts and a partial view of the pubic area. J.B. has a tattoo of her name on her left breast and the "J" and part of an "A" are visible.

kb7vaeuc0.vdata_embedded_1 Date: 06/09/2020 06:03:43 a.m. **(COUNT 34)**

Description: Photo depicts a nude female laying on her back. The photo depicts the exposed pubic area, the lower portion of the right breast is exposed. Everything in the background matches the previous photo and appears to part of series of photos taken of the victim based on the time and continuation.

kb7vaf8m0.vdata_embedded_1 Date: 06/09/2020 06:03:48 a.m. **(COUNT 35)**

Description: Photo depicts a nude female laying on her back. The photo depicts the exposed pubic area, left and right breast is exposed. Again, everything in the background matches the previous two photos and is in same time and date stamp.

kb7vafh80.vdata_embedded_1 Date: 06/09/2020 06:03:55 a.m. **(COUNT 36)**

Description: Photo depicts a close up shot of a female exposed pubic area. A small section of the photo the same brown sheets can be seen underneath the body as are seen in the previous photos referenced above.

kb7vafvz0.vdata_embedded_1 Date: 06/09/2020 06:04:00 a.m. **(COUNT 37)**

Description: Photo depicts a close up shot of a female exposed pubic area. It slight further away than the previous photo and the same brown sheets and part of the gray and white blanket that is shown in the previous photos can be seen.

COUNTS 38-43 Possession of Child Pornography

Inv. L. Johnson advises that he drafted two search warrants for digital analysis of Stanger's Toshiba laptop and Samsung Android cell phone. The laptop was in the Village of Rochester residence and the cell phone was taken as evidence upon Stanger's arrest in the City of Burlington, both of these devices were in Stanger's possession at these addresses in 2021. Both addresses are in Racine County, WI.

Inv. A. Sparks advises that he drafted one search warrant for digital analysis of a SanDisk SD card located within the residence in the Village of Rochester.

Shane Stanger has accumulated over 21 videos including two of which he can be seen sexually assaulting a victim who is 10 years old. The remainder of these videos depict females ranging from ages 6 to 17 in

various stages of undress and using the bathroom. The purpose of these videos is for Stanger's own sexual gratification as they were retained on his devices as of the year 2021.

kjtua0dc Victim: PC DOB: 8/5/10 **(COUNT 38)**

Recorded 01/12/2021 at 10:17 (UTC) (04:17 local) 02:08 in duration

kjxzpldz Victim: PC DOB: 8/5/10 **(COUNT 39)**

Recorded 01/15/2021 at 07:58 (UTC) (01:58 local) 02:08 in duration

Examination of the files from Stanger's cell phone reflected in counts 38 & 39 above show that there are two recorded videos of a juvenile, identified as P.C., date of birth 8/5/10, who was 10 years old at the time of the recording. The recording took place on 1/12/21 and 1/15/21. The recording shows a male hand moving the young girl's underwear around and the male adult hand digitally penetrating the girl's vagina. The girl, P.C., is the daughter of Stanger's girlfriend, M.R., who resides in Bettendorf, Iowa. M.R. found P.C.'s underwear, advising it's the same underwear shown in the video. The underwear was collected and is in evidence in Iowa. While being present in the Village of Rochester on February 28, 2021, Stanger possessed the recordings of a child he knew to be under the age of 18 years while he was sexually exploiting this minor child.

Videos from Stanger's laptop

Examination of files from Stanger's laptop reflected there were three recorded videos of a juvenile, identified as M.C., DOB 12/30/2005. These videos are described as follows:

QVR_2019_07_23_02_29_49_trim Victim: MC DOB: 12/30/2005 recorded 07/23/2019 **(COUNT 40)**

00:36 in duration

It appears the camera is near the door, possibly on the vanity. It is pointed towards the shower and toilet. A female identified as MC is seated on the toilet and it appears she is going to the bathroom. She is wearing a green tie dyed shirt. Near the end of the video, she stands up exposing her pubic area. The video stops. Taken in context of Stanger's other video recordings of intimate parts of his victims, this recording meets the definition of child pornography for sexually explicit conduct of lewd exhibition of intimate parts because of Stanger's possession of an under age victim with a camera pointed at the toilet where the focus is on a less than fully covered intimate parts of a child in a way that places an unusual focus on the intimate parts because the angle is on the child using the toilet per Wis. Stat. 948.01(1t).

QVR_2019_08_21_11_32_19 Victim: MC DOB: 12/30/2005 Recorded 08/21/2019 **(COUNT 41)**

15:55 in duration

In the beginning Stanger is observed setting up the camera and positions it facing the toilet and shower. He then leaves and a short time later at duration 01:16 MC enters wearing a green shirt and black pants. She starts the shower and uses the toilet. From this point she completely disrobes exposing her pubic area, breasts, and buttocks. She then enters the shower and at duration 14:06 she opens the shower curtain and exposes herself once more. She then dries off with an orange towel and leaves the bathroom. Stanger then enters the bathroom and removes the camera and lays down on bed in MR's bedroom. The video stops. Again due to the unusual focus of the video at the shower wherein a child is depicted disrobing, on Stanger's device, this image is alleged to be child pornography.

QVR_2019_08_20_12_55_58_trim Victim: MC DOB: 12/30/2005 **(COUNT 42)**

08/20/2019

07:16 in duration

The camera again appears to be in the same position as the two previous videos, it begins showing MC wearing the same green tie-dyed shirt as she was wearing before. The shower is already running, and she disrobes exposing her pubic area, breasts, and

buttocks. She enters the shower and at duration 06:10 she exits the shower again exposing herself. She drives off with an orange towel and leaves the bathroom. The video stops. Due to the focus on the child taking a shower in the context of the other images possessed on Stanger's device, this video is alleged to be child pornography.

Videos from Stanger's SD card

Examination of files from a SD card recovered from Stanger's possessions at the residence in the Village of Rochester reflected a video that contained three juveniles, identified as, J.S., DOB 02/20/2013, P.C., DOB 08/05/2010, B.U. 03/19/2015.

11-47-32_2a (COUNT 43)

07/07/2020

10:00 in duration

02:57 – Victim J.S. DOB 02/20/2013 can be seen removing her shorts and underwear, exposing her pubic area, buttocks and use the bathroom

04:07 – Victim P.C. DOB 08/05/2010 can be seen removing her shorts and underwear, exposing her pubic area, buttocks and use the bathroom

08:58 – Victim B.U. 03/19/2015 can be seen removing her pants and underwear, exposing her pubic area, buttocks and use the bathroom

Due to the unusual focus of the video at the toilet wherein a child is depicted disrobing, on Stanger's device, this image is alleged to be child pornography.

COUNTS 44-62 Invasion of Privacy & COUNTS 63-81 Representations Depicting Nudity

During the examination of evidence on Shane M Stanger's laptop (Toshiba Qosmio SN#B8014753H), Inv. Sparks observed several videos that appeared to have been captured in a workplace employee bathroom, in an area not used by the public, at Michael's on the Lake 3101 Eagle Rd., Town of Dover, County of Racine, where Stanger was employed as a bartender from approx. 02/19/2020 to the time of his arrest, 3/1/2021. Inside the bathroom, on the opposite wall of the toilet is a coat rack where it appears that Stanger would place the camera that he used.

All the of victims mentioned below indicated that they gave no consent to be recorded or for any depictions of nudity to be saved onto any device and they each identified themselves.

Video Title: 0306 Victim: RMS (adult) (COUNT 44 & 63)

Video Duration: 03:29

Exif Data: 03/07/2020

00:15 - Stanger can be seen setting up the camera, he is wearing a white button up shirt and black pants

01:02 – RMS can be seen coming into view of the camera and using toilet

01:29 – RMS' pubic area can be seen

03:14 - Stanger can be seen removing the camera

Video Title: \$RJKOPZY Victim: RMS (adult) (COUNT 45 & 64)

Video Duration: 09:23

Exif Data: 03/13/2020

00:05 - Stanger can be seen setting up the camera, he is wearing a white button up shirt and black pants

01:28 – RMS can be seen coming into view of the camera and using toilet

01:48 - RMS's pubic area can be seen

09:23 - Video feed goes black and video ends

Video Title: (redacted name) 001 Victim RMS (adult) **(COUNT 46 & 65)**

Video Duration: 01:18

Exif Data: 12/12/2020

00:13 - RMS can be seen coming into view of the camera and using toilet

00:35 - RMS's pubic area can be seen

01:18 - Video ends

Video Title: \$RA6CW7Z Victim: JLM (adult) **(COUNT 47 & 66)**

Video Duration: 16:23

Exif Data: 12/13/2019

00:20 - Stanger can be seen setting up the camera, he is wearing a black shirt with gray tie, black pants, and black shoes

01:09 - JLM enters bathroom and uses toilet

01:35 - JLM's buttocks are exposed

16:23 - Video ends

Video Title: \$R82O1Y Victim: ELB DOB: 04/22/2005 **(COUNT 48 & 67)**

Video Duration: 13:28

Exif Data: 03/07/2020

00:25 - Stanger can be seen setting up the camera, he is wearing a blue plaid shirt, black pants, and black shoes

00:41 - Stanger can be seen adjusting jackets and the camera in a better attempt to conceal it

01:35 - ELB can be seen coming into view of the camera and using toilet

01:45 - ELB's pubic area can be seen

03:15 - ELB leaves view of the camera

04:05 - Video feed goes black

13:28 - Video ends

Video Title: 0305_001 Victim: ELB DOB: 04/22/2005 **(COUNT 49 & 68)**

Video Duration: 01:22

Exif Data: 12/12/2020

00:01 - ELB can be seen coming into view of the camera and using toilet

00:13 - ELB's pubic area can be seen

01:21 - Video ends

Video Title: QVR_2019_12_27_18_49_02 Victim: JGH DOB: 02/17/2005 **(COUNT 50 & 69)**

Video Duration: 33:22

Exif Data: 12/28/2019

00:18 - Stanger can be seen setting up the camera, he is wearing a blue plaid shirt, black pants, and black shoes

02:30 - JGH can be seen coming into view of the camera and using the toilet

04:01 - JGH's pubic area can be seen

05:02 - JGH leaves view of the camera

33:22 - Video ends

Video Title: 1212_001 Victim: JGH DOB: 02/17/2005 **(COUNT 51 & 70)**

Video Duration: 01:43

Exif Data: 12/12/2020

00:00 - JGH can be seen standing in front of toilet

00:17 - JGH uses toilet and pubic area is exposed

01:43 - Video ends

Video Title: 1213_001 Victim: JGH DOB: 02/17/2005 **(COUNT 52 & 71)**

Video Duration: 02:03

Exif Data: 12/12/2020

00:30 - JGH can be seen coming into view of the camera and using the toilet

00:33 - JGH's pubic area is exposed

02:03 - Video ends

Video Title: \$RA6CW7Z Victim: JGH DOB: 02/17/2005 **(COUNT 53 & 72)**

Video Duration: 16:23

Exif Data: 12/13/2019

00:20 - Stanger can be seen setting up the camera, he is wearing a black shirt with gray tie, black pants, and black shoes

01:09 - Female (not JGH) victim enters bathroom and uses toilet

01:35 - Female victim's buttocks are exposed

13:28 - JGH can be seen coming into view of the camera and uses toilet and pubic area is exposed

15:16 - JGH leaves view of the camera

16:23 - Video ends

Video Duration: 07:30 Victim: JGH DOB: 2/17/2005 **(COUNT 54 & 73)**

Exif Data: 12/12/2019

00:33 - Stanger can be seen setting up the camera, he is wearing a blue plaid shirt, black pants, and black shoes

00:55 - Stanger can be seen point towards the camera and then pointing between his legs as he sits on the toilet to ensure

the camera is able to see a clear view of the victim's pubic area

01:50 - JGH can be seen coming into view of the camera and uses toilet

02:08 - JGH's pubic area is exposed

07:30 - Video ends

Video Title: (redacted name) Victim: JMA DOB: 05/15/2003 **(COUNT 55 & 74)**

Video Duration: 01:10

Exif Data: 10/03/2020

00:25 - Female can be seen entering view of camera and using bathroom

00:28 - Female's pubic area exposed

01:10 - Video ends

It should be noted the victim's face can't be seen in this video, however JMA was shown a cropped image of the victim's forehead looking down and she identified it as herself. Also, there is a black leather belt with a metal clasp that matches a video was able to identify herself in as well.

Video Title: (redacted name) Victim: JMA DOB: 05/15/2003 **(COUNT 56 & 75)**

Video Duration: 03:47

Exif Data: 11/08/2020

00:16 - Female can be seen entering view of camera and using bathroom

03:24 - JMA's pubic area exposed

03:47 - Video ends

It should be noted the victim's face can't be seen in this video, however again JMA was shown a cropped image of a necklace the victim was wearing and JMA identified the necklace as her own.

Video Title: \$R82O1Y Victim: TRB DOB: 10/13/2004 **(COUNT 57 & 76)**

Video Duration: 13:28

Exif Data: 03/07/2020

00:25 - Stanger can be seen setting up the camera, he is wearing a blue plaid shirt, black pants, and black shoes
00:41 - Stanger can be seen adjusting jackets and the camera in a better attempt to conceal it
01:35 - prior victim can be seen coming into view of the camera and using toilet
01:45 - prior victim's pubic area can be seen
03:15 - prior victim leaves view of the camera
04:05 - Video feed goes black
11:16 - TRB can be seen coming into view of the camera and using toilet
11:30 - TRB's pubic area is exposed
11:45 - TRB leaves view of the camera
13:28 - Video ends

Video Title: 0305_002 Victim: TRB DOB: 10/13/2004 **(COUNT 58 & 77)**

Video Duration: 01:33

Exif Data: 12/12/2020

00:11 - TRB can be seen coming into view of the camera and using toilet

00:25 - TRB's pubic area is exposed

00:37 - TRB leaves view of the camera

01:33 - Video ends

Video Title: QVR_2020_12_31_19_54_19_001 Victim: MRO DOB: 02/14/2004 **(COUNT 59 & 78)**

Video Duration: 06:10

Exif Data: 01/01/2021

00:09 - Female can be seen entering view of camera and using bathroom

02:53 - Female's pubic area and buttocks exposed

03:32 - Female leaves view of camera

06:10 - Video ends

It should be noted the female victim's face isn't clearly visible, however a cropped image of the victim's cell phone was shown to MRO and she identified it as hers.

Video Title: (redacted name) Victim: MRO DOB: 02/14/2004 **(COUNT 60 & 79)**

Video Duration: 03:08

Exif Data: 11/14/2020

00:16 – MRO can be seen entering view of camera and using bathroom

00:46 - MRO's pubic area exposed

03:08 - Video ends

Video Title: (redacted name) Victim: MRO DOB: 02/14/2004 **(COUNT 61 & 80)**

Video Duration: 02:26

Exif Data: 11/21/2020

00:18 – MRO can be seen entering view of camera and using bathroom

01:35 - MRO's pubic area exposed

02:26 - Video ends

Video Title: (redacted name) Victim: MRO DOB: 02/14/2004 **(COUNT 62 & 81)**

Video Duration: 02:35

Exif Data: 11/29/2020

00:03 – MRO can be seen entering view of camera and using bathroom

00:23 - MRO's pubic area exposed

02:35 - Video ends

It should be noted in the first two aforementioned videos, mak1 and mak2 the victim's face isn't visible, however the cell phone and cell phone case is and it matches the cell phone case in mak3. MRO confirmed that it is her in all three videos.

COUNT 82 Stalking (Domestic Abuse) Victim J.B.

Shane Stanger engaged in the following course of conduct

J.B. contacted Inv. Sparks on or about March 1, 2021, stating she found a camera in her bedroom under some clothes and pointed towards her bed. The camera was recovered later that week and placed into evidence. On Stanger's phone there were two photos in his gallery that were taken on February 28, 2021 1:45 p.m. and

February 28, 2021 12:14 p.m., on the photos a date and time stamp of 2021-03-01 08:35:12 and 2021 -03-01 02:14:22 respectively. JB advises the photos are of her bedroom in the Village of Rochester, Racine County, WI. It is believed that Stanger was stalking JB by engaging in a course of conduct, using an electronic means (IP camera) to monitor and/or recording JB's activities, specifically Her in her bedroom by recording himself numerous times sexually assaulting JB, including sending the below described letter to her, using another inmate's information as the sender/return addressee.

Count 83 Intimidation of a Victim - Felony (Domestic Abuse) Victim J.B.

On April 5, 2021, JB contacted Inv. Sparks to advise that SHANE STANGER sent her an eleven-page letter from the jail. While he made it appear to be from another inmate, JE, part of the letter was to their children and it was signed "Dad Shane Stanger". The portions of the letter addressed to JB direct her to recant her statement "Just remember this slogan I made for you, If you say you cant cause its out of your hand just RE-CANT. When they ask in trial Don't say I can't-- just Recant Lol. So basically recant your story and get me out of this mess." "And I pray you re-cant (recant) your story, let them know you were hung over pissed off and not a morning person and your emotions got the best of you." "...but (name redacted), (second name redacted), anyone else who has crossed me then will be facing tough times soon..." "I got carried away with that stupid drug..." "There is a guy in jail who killed 3 ppl and his bond is only 100,000, mine is 5 million because I was so in love with you I recorded everything in case I ever lost you, so I would still have every piece of you in my mind." JB indicated she took the statements in the letter to be implied threats of violence and that his letter caused her serious emotional distress.

Count 84 Intimidation of Victim – Felony (Threats) Victim M.R.

On 4/21/2021, Inv. Sparks received an email from a Detective from the Bettendorf, Iowa Police Department with the contents of a letter that was sent from the Racine County Jail by Stanger to victim M.R. in Bettendorf, Iowa, who was also recorded while unconscious, being raped by Stanger. This victim is also the mother of the 10-year-old child who Stanger sexually assaulted and recorded himself doing so, thus creating the sexually explicated images of the child. Just like the letter sent to JB, the return addressee was another inmate, J.E. Just like the letter sent to JB, Stanger threatens MR if she does not do what he wants. "...well unfortunately for me, I still need you, so no matter what your scared of w/the girls dad or Sparks, I can and will destroy your life way worse than either one of those 2 could..." "So unless you want to end up without your girls and in jail as well, your gonna have to communicate w/me and help me out still for a bit..." "...I have a letter wrote detailing all about that wonderful drug we did and even with your girls there..." "...and I have one for Sparks on that detailing where he can find certain things that will put you right where I am (in hell)..." "...you dont get to run and hide anymore you have a choice help me or lose everything!" "Really you gonna turn on me and give the underwear, when you could have just as easy said it wasn't her, and definitely not give something to incriminate me for something I truly..."

"...Im going to give you until 4/20 though to hear from you, and if not I send the first letter out to Norfolk, I hate that you have made me have to do this..." "So look at this way, what happens when you can longer talk to your kids?" "So like I said in the beggining no matter what they have said to you Theres always ways around it!"

"Either way though I have to survive so if I don't hear from you I WILL GO through with my next phase of my plan!" "Like I said you will lose girls + much much more!" The letter was signed "Shane".

Just like JB, MR took the threats in the letter from Stanger to include threats of physical violence and caused her serious emotional distress.

Subscribed and sworn to before me on 05/03/21
Electronically Signed By:
Dirk C Jensen
Deputy District Attorney
State Bar #: 1027602

Electronically Signed By:
Sgt Butler
Complainant