



The above-named defendant on or about October 7 to October 8, 2024, at 1818 West National Avenue, in the City of Milwaukee, Milwaukee 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.

Upon conviction for this offense, a Class I Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

**Count 5: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)**

The above-named defendant on or about October 7 to October 8, 2024, at 1818 West National Avenue, in the City of Milwaukee, Milwaukee 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.

Upon conviction for this offense, a Class I Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

**Count 6: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)**

The above-named defendant on or about October 7 to October 8, 2024, at 1818 West National Avenue, in the City of Milwaukee, Milwaukee 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.

Upon conviction for this offense, a Class I Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

**Count 7: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)**

The above-named defendant on or about October 7 to October 8, 2024, at 1818 West National Avenue, in the City of Milwaukee, Milwaukee 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.

Upon conviction for this offense, a Class I Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

**Count 8: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)**

The above-named defendant on or about October 7 to October 8, 2024, at 1818 West National Avenue, in the City of Milwaukee, Milwaukee 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.

Upon conviction for this offense, a Class I Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

**Count 9: INVASION OF PRIVACY - SURVEILLANCE DEVICE (VICTIM UNDER AGE 18)**

The above-named defendant on or about October 7 to October 8, 2024, at 1818 West National Avenue, in the City of Milwaukee, Milwaukee 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.

Upon conviction for this offense, a Class I Felony, the defendant 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.

KENT LOVERN, DISTRICT ATTORNEY

Date Signed: 03/20/25

Electronically Signed By:

Thomas Hasle

Assistant District Attorney

State Bar #: 1116075