FILED SUPERIOR COURT OF CALIFORNIA

COUNTY of SANTA BARBARA

09/06/2024

Darrel E. Parker, Executive Officer

Deputy Clerk

THE SUPERIOR COURT, STATE OF CALIFORNIA

For the County of Santa Barbara

Figueroa Division

# THE PEOPLE OF THE STATE OF CALIFORNIA

Plaintiff,

vs.

STEVEN CARL SCHAPANSKY

DOB: 02/13/1970

Defendant.

DA No. 24-07-528800 Court No. **24CR06930** 

BY Gerhard, Lisa

# **FELONY COMPLAINT**

**AB109 INELIGIBLE** 

The undersigned is informed and believes that:

# COUNT 1

On or between January 1, 2018 and December 24, 2019, in the County of Santa Barbara, the crime of LEWD OR LASCIVIOUS ACT UPON A CHILD, in violation of **PENAL CODE SECTION 288(a)**, a Felony, was committed by STEVEN CARL SCHAPANSKY, who did willfully, unlawfully, and lewdly commit a lewd or lascivious act upon or with the body or certain parts or members thereof of JANE DOE 2, a child under the age of 14, with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of the said defendant(s) or the said child, to wit: WHEN DEFENDANT TOUCHED HER WHILE SHE WAS SLEEPING.

It is further alleged that the above offense is a violent felony pursuant to **Penal Code Section** 667.5(c)(6).

It is further alleged that the above offense is a serious felony within the meaning of **Penal Code Section** 1192.7(c)(6).

It is further alleged that the Court shall prohibit all visitation between defendant and the child victim(s) pursuant to **Penal Code Section 1202.05(a).** 

"NOTICE: Conviction of this offense will require you to register pursuant to **Penal Code Section 290**. Willful failure to register is a crime."

"NOTICE: Pursuant to the provisions of **PC Section 293.5** the use of pseudonym "Jane or John Doe", if it appears in the complaint or information, is for purposes of protecting the privacy of the alleged victim."

"NOTICE: To defendant and defendant's attorney of record; be advised that pursuant to **California Evidence Code Section 1108**, the People intend to introduce evidence of any prior act(s) of sexual offenses committed by the defendant."

# SPEC ALLEG-STATUTE OF LIMITATIONS-MINOR

It is further alleged, pursuant to Penal Code section 803(f)(1), that the victim in the above offense is under 18 years of age and reported the offense to a responsible adult and agency on 07/17/2024.

On or between April 1, 2023 and April 30, 2023, in the County of Santa Barbara, the crime of LEWD OR LASCIVIOUS ACT UPON A CHILD, in violation of **PENAL CODE SECTION 288(a)**, a Felony, was committed by STEVEN CARL SCHAPANSKY, who did willfully, unlawfully, and lewdly commit a lewd or lascivious act upon or with the body or certain parts or members thereof of JANE DOE 27, a child under the age of 14, with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of the said defendant(s) or the said child, to wit: WHEN DEFENDANT TOUCHED HER WHILE SHE WAS SLEEPING.

It is further alleged that the above offense is a violent felony pursuant to Penal Code Section 667.5(c)(6).

It is further alleged that the above offense is a serious felony within the meaning of **Penal Code Section** 1192.7(c)(6).

It is further alleged that the Court shall prohibit all visitation between defendant and the child victim(s) pursuant to **Penal Code Section 1202.05(a)**.

"NOTICE: Conviction of this offense will require you to register pursuant to **Penal Code Section 290**. Willful failure to register is a crime."

"NOTICE: Pursuant to the provisions of **PC Section 293.5** the use of pseudonym "Jane or John Doe", if it appears in the complaint or information, is for purposes of protecting the privacy of the alleged victim."

"NOTICE: To defendant and defendant's attorney of record; be advised that pursuant to **California Evidence Code Section 1108**, the People intend to introduce evidence of any prior act(s) of sexual offenses committed by the defendant."

# **SPEC ALLEG – SERIOUS/VIOLENT/REGISTERABLE SEX OFFENSE FELONY**

It is further alleged, as to Count(s) 1 and 2, that the above offenses are serious felonies within the meaning of Penal Code section 1192.7(c) and/or a violent felony described in subdivision(s) of Penal Code section 667.5 and/or an offense requiring registration under the provisions Penal Code sections 290 et seq, pursuant to Penal Code section 1170(h), that the defendant is ineligible for a state prison sentence to be served in the county jail.

"NOTICE: Pursuant to Penal Code section 1170(f), notwithstanding any other provisions of this section, for purposes of subdivision (h) of section 1170, any allegation that a defendant is ineligible for a state prison sentence to be served in the county jail due to a prior or current conviction, or sentence enhancement, or because he or she is required to register as a sex offender, or because the legislature specifically excluded the offense, shall not be subject to dismissal pursuant to §1385 PC."

### SPECIAL ALLEGATION: AGGRAVATING FACTORS

It is further alleged as to Count(s) 1 to 2, that the People will seek findings from the jury on factors in aggravation pursuant to **California Rules of Court, Rule 4.421** that:

### Pursuant to California Rules of Court, Rule 4.421(a):

- (a)(3) The victim was particularly vulnerable;
- (a)(8) The manner in which the crime was carried out indicates planning, sophistication, or professionalism;
- (a)(11) The defendant took advantage of a position of trust or confidence to commit the offense.

# COUNT 3

On or about July 30, 2017, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 7.

## COUNT 4

On or about July 30, 2017, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 19.

## COUNT 5

On or about July 30, 2017, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 14.

On or about July 30, 2017, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 15.

### COUNT 7

On or about July 30, 2017, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 16.

### COUNT 8

On or about July 30, 2017, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 17.

### COUNT 9

On or about July 30, 2017, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE18.

On or about July 30, 2017, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 20.

### COUNT 11

On or about July 30, 2017, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 23.

# COUNT 12

On or about May 13, 2018, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 6.

### COUNT 13

On or about August 4, 2018, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 6.

On or about August 4, 2018, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 7.

### COUNT 15

On or about August 4, 2018, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 4.

# COUNT 16

On or about August 4, 2018, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 5.

### COUNT 17

On or about February 3, 2019, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 22.

On or about March 26, 2019, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 2.

### COUNT 19

On or about July 10, 2019, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 1.

# COUNT 20

On or about July 10, 2019, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 11.

### COUNT 21

On or about November 17, 2019, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 3.

On or about January 1, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 31.

### COUNT 23

On or about January 1, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 25.

# COUNT 24

On or about January 1, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 37.

### COUNT 25

On or about January 1, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 1.

On or about January 1, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 24.

### COUNT 27

On or about January 1, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 33.

# COUNT 28

On or about January 1, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 34.

### COUNT 29

On or about January 1, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 8.

On or about January 1, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 3.

### COUNT 31

On or about January 1, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 38.

# COUNT 32

On or about January 2, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 29.

### COUNT 33

On or about January 5, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 2.

On or about and between January 1, 2020 and January 6, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 40.

# COUNT 35

On or about and between January 1, 2020 and January 6, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 44.

# COUNT 36

On or about and between January 1, 2020 and January 6, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: UNKNOWN MINOR.

### COUNT 37

On or about and between January 1, 2020 and January 6, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 32.

On or about and between January 1, 2020 and January 6, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 43.

### COUNT 39

On or about and between January 1, 2020 and January 6, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 32.

# COUNT 40

On or about and between January 1, 2020 and January 6, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: UNKNOWN MINOR.

### COUNT 41

On or about and between January 1, 2020 and January 6, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: UNKNOWN MINOR.

On or about and between January 1, 2020 and January 6, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: UNKNOWN MINOR.

# COUNT 43

On or about and between January 1, 2020 and January 6, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 39.

# COUNT 44

On or about and between January 1, 2020 and January 6, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 31.

### COUNT 45

On or about and between January 1, 2020 and January 6, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: UKNOWN MINOR.

On or about and between January 1, 2020 and January 6, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: UNKNOWN MINOR.

### COUNT 47

On or about and between January 1, 2020 and January 6, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 42.

# COUNT 48

On or about and between January 1, 2020 and January 6, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 41.

# COUNT 49

On or about and between January 1, 2020 and January 6, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 30.

On or about and between January 1, 2020 and January 6, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 36.

# COUNT 51

On or about and between January 1, 2020 and January 6, 2020, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 45.

# COUNT 52

On or about June 11, 2021, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 1.

### COUNT 53

On or about June 11, 2021, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 2.

On or about August 4, 2021, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 3.

### COUNT 55

On or about August 6, 2021, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 3.

# COUNT 56

On or about August 7, 2021, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 1.

### COUNT 57

On or about August 7, 2021, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 3.

On or about August 25, 2021, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 8.

### COUNT 59

On or about September 13, 2021, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 1.

# COUNT 60

On or about September 13, 2021, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 21.

### COUNT 61

On or about September 13, 2021, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 2.

On or about February 15, 2022, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 13.

### COUNT 63

On or about February 15, 2022, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 46.

# COUNT 64

On or about March 1, 2022, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 9.

### COUNT 65

On or about May 9, 2022, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 2.

On or about September 4, 2022, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 10.

### COUNT 67

On or about October 1, 2022, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 1.

### COUNT 68

On or about October 1, 2022, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 3.

### COUNT 69

On or about October 1, 2022, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 12.

On or about June 1, 2023, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 8.

# COUNT 71

On or about June 1, 2023, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 25.

# COUNT 72

On or about June 1, 2023, in the County of Santa Barbara, the crime of UNLAWFUL ELECTRONIC PEEPING, in violation of **PENAL CODE SECTION 647(j)(3)(A)**, a Misdemeanor, was committed by STEVEN CARL SCHAPANSKY, who did willfully and unlawfully use a concealed camcorder, motion picture camera, or photographic camera to secretly videotape, film, photograph, or record by electronic means, another identifiable person who may be in a state of full or partial undress, for the purpose of viewing the body of, or the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room, or tanning booth, or the interior of any other area in which that other person has a reasonable expectation of privacy, with the intent to invade the privacy of that other person, to wit: JANE DOE 29.

# SPEC ALLEG-STATUTE OF LIMITATIONS-LATE DISCOVERY

It is further alleged, as to Count(s) 3 to 72, that the above violations were not discovered until JULY 12, 2024 and that no victim of said violation and no law enforcement agency chargeable with the investigation and prosecution of said violation had actual and constructive knowledge of said violation prior to said date because these were hidden recordings as described in paragraph (2) or (3) of subdivision (j) of Section 647, within the meaning of Penal Code section 803(i).

\* \* \* \* \* \* \*

Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 72 COUNT(S).

Executed at Santa Barbara, California, on September 6, 2024.

John J. Sawusch

CASEY B. NELSON SENIOR DEPUTY DISTRICT ATTORNEY

Agency: SBSO

							DRIVER'S		COURT
DEFENDANT NAME	<u>SEX</u>	RACE	HGT	WGT	EYES	HAIR	<b>LICENSE</b>	<u>STS</u>	DATE
Steven Carl Schapansky	М	W	602	210	BLU	BLO	C6230487	CR	09/13/2024

mpl