

**SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
CRIMINAL DIVISION - MISDEMEANOR BRANCH**

UNITED STATES OF AMERICA)	Case No. 2014-CMD-118262
)	
v.)	Senior Judges
)	
<u>BERNARD FREUNDEL</u>)	Status Hearing: February 19, 2015

INFORMATION

1. On or about September 19, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant A who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant A, without the express and informed consent of Female Complainant A, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

2. On or about September 19, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant B who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant B, without the express and informed consent of Female Complainant B, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

3. On or about September 19, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant C who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant C, without the express and informed consent of Female Complainant C, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

4. On or about September 19, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant D who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant D, without the express and informed consent of Female Complainant D, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

5. On or about May 1, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant E who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant E, without the express and informed consent of Female Complainant E, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

6. On or about April 27, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant F who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant F, without the express and informed consent of Female Complainant F, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

7. On or about April 27, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant G who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant G, without the express and informed consent of Female Complainant G, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

8. On or about March 28, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant H who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant H, without the express and informed consent of Female Complainant H, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

9. On or about March 28, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant I who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant I, without the express and informed consent of Female Complainant I, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

10. On or about March 2, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant J who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant J, without the express and informed consent of Female Complainant J, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

11. On or about March 2, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant K who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant K, without the express and informed consent of Female Complainant K, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

12. On or about February 16, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant L who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant L, without the express and informed consent of Female Complainant L, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

13. On or about February 16, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant M who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant M, without the express and informed consent of Female Complainant M, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

14. On or about February 16, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant N who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant N, without the express and informed consent of Female Complainant N, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

15. On or about February 16, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant O who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant O, without the express and informed consent of Female Complainant O, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

16. On or about February 16, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant P who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant P, without the express and informed consent of Female Complainant P, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

17. On or about February 16, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant ZZ who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant ZZ, without the express and informed consent of Female Complainant ZZ, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

18. On or about February 9, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant Q who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant Q, without the express and informed consent of Female Complainant Q, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

19. On or about February 3, 2014, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant R who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant R, without the express and informed consent of Female Complainant R, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

20. On or about November 24, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant S who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant S, without the express and informed consent of Female Complainant S, who was using a bathroom or rest room and totally or partially undressed or changing clothes.

(Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

21. On or about November 22, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant T who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant T, without the express and informed consent of Female Complainant T, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

22. On or about November 17, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant U who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant U, without the express and informed consent of Female Complainant U, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

23. On or about November 17, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant V who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant V, without the express and informed consent of Female Complainant V, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

24. On or about November 17, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant W who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant W, without the express and informed consent of Female Complainant W, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

25. On or about November 17, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant X who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant X, without the express and informed consent of Female Complainant X, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

26. On or about November 10, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant Y who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant Y, without the express and informed consent of Female Complainant Y, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

27. On or about November 10, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant Z who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant Z, without the express and informed consent of Female Complainant Z, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

28. On or about October 6, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant AA who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant AA, without the express and informed consent of Female Complainant AA, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

29. On or about October 6, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant BB who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant BB, without the express and informed consent of Female Complainant BB, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

30. On or about October 4, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant CC who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant CC, without the express and informed consent of Female Complainant CC, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

31. On or about May 19, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant DD who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant DD, without the express and informed consent of Female Complainant DD, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

32. On or about May 19, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant EE who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant EE, without the express and informed consent of Female Complainant EE, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

33. On or about May 18, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant FF who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant FF, without the express and informed consent of Female Complainant FF, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

34. On or about April 21, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant GG who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant GG, without the express and informed consent of Female Complainant GG, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

35. On or about April 21, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant HH who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant HH, without the express and informed consent of Female Complainant HH, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

36. On or about April 21, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant II who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant II, without the express and informed consent of Female Complainant II, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

37. On or about April 21, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant JJ who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant JJ, without the express and informed consent of Female Complainant JJ, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

38. On or about April 21, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant KK who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant KK, without the express and informed consent of Female Complainant KK, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

39. On or about March 15, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant LL who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant LL, without the express and informed consent of Female Complainant LL, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

40. On or about February 17, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant MM who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant MM, without the express and informed consent of Female Complainant MM, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

41. On or about February 17, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant NN who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant NN, without the express and informed consent of Female Complainant NN, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

42. On or about December 17, 2013, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant OO who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant OO, without the express and informed consent of Female Complainant OO, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

43. On or about October 24, 2012, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant PP who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant PP, without the express and informed consent of Female Complainant PP, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

44. On or about October 24, 2012, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant QQ who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant QQ, without the express and informed consent of Female Complainant QQ, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

45. On or about October 24, 2012, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant RR who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant RR, without the express and informed consent of Female Complainant RR, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

46. On or about August 26, 2012, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant SS who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant SS, without the express and informed consent of Female Complainant SS, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

47. On or about May 24, 2012, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant TT who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant TT, without the express and informed consent of Female Complainant TT, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

48. On or about May 24, 2012, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant UU who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant UU, without the express and informed consent of Female Complainant UU, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

49. On or about May 24, 2012, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant VV who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant VV, without the express and informed consent of Female Complainant VV, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

50. On or about April 22, 2012, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant WW who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant WW, without the express and informed consent of Female Complainant WW, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

51. On or about March 4, 2012, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant XX who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant XX, without the express and informed consent of Female Complainant XX, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

52. On or about March 4, 2012, within the District of Columbia, Bernard Freundel installed and maintained an electronic device for the purpose of secretly and surreptitiously observing Female Complainant YY who was using a bathroom or rest room and totally or partially undressed or changing clothes, and Bernard Freundel electronically recorded Female Complainant YY, without the express and informed consent of Female Complainant YY, who was using a bathroom or rest room and totally or partially undressed or changing clothes. (Voyeurism, 22 D.C. Code, Section 3531(b) and (c) (2001 ed.)).

Respectfully submitted,

RONALD C. MACHEN, JR.
UNITED STATES ATTORNEY

Amy Zubrensky
Assistant United States Attorney