

November 30 2017 10:18 AM

KEVIN STOCK
COUNTY CLERK

SUPERIOR COURT OF WASHINGTON FOR PIERCE COUNTY

STATE OF WASHINGTON,

Plaintiff,

CAUSE NO. 17-1-04550-2

vs.

DECLARATION FOR DETERMINATION OF
PROBABLE CAUSE
(ADPC)

ADAM N RANDOLPH,

Defendant.

DOB: 08/05/1997

CHELSEY MILLER declares under penalty of perjury:

That I am a deputy prosecuting attorney for Pierce County and I am familiar with the police report and/or investigation conducted by the TACOMA POLICE DEPARTMENT, incident number 1705300608;

That the police report and/or investigation provided me the following information;

That in Pierce County, Washington, on or about the period between November 10, 2016, and February 22, 2017, the defendant, ADAM N RANDOLPH, did commit the crimes of Attempted Voyeurism in the First Degree (three counts) and Voyeurism in the First Degree (seven counts).

On November 10, 2016, A.K., a staff member of the University of Puget Sound, reported a suspicious person in the women's restroom on the second floor of Wyatt Hall. The day before, she had been in the same restroom and noticed a person wearing black tennis shoes in one of the stalls at 8 am, when she returned at 11 am and again when she returned at 1 pm. The following day she went to the same restroom at 8am and again saw the black tennis shoes in the same stall. She contacted custodian Dan Jones before re-entering the restroom and asking the individual if they were ok. The person responded with a "grunt." A few minutes later, they observed a white male in his 20's wearing a blue hooded sweatshirt, black pants, and black shoes exit the woman's restroom and leave the building. (Count I)

On January 18, 2017, A.K. again contacted school security regarding a suspicious male in the women's restroom at Wyatt Hall. She reported she believed it was the same male during the incidents in November. When asked she asked the person in the stall if everything was ok, a male voice responded "yes" and a few minutes later, a white male with loose fitting black sweatpants and a black hooded sweatshirt left the women's restroom. Security followed the individual to Weyerhaeuser Hall and then lost him. (Count II)

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3 On January 25, 2017, UPS student K.M., reported to a staff member that she saw a person in the last stall of the women's
4 restroom at Weyerhaeuser Hall at 10 am who was still there when she returned two hours later. She said that she looked
5 under the stall partition and saw that the person had a cell phone pointed in her direction. Believing the person was
6 attempting to film her, she left and contacted a staff member who called security. A few minutes later she saw the person
7 leave the restroom and described him as a white male, 6' - 6'2", 180 lbs, 18-20 years old wearing a dark colored hooded
8 sweatshirt, black pants and black and white tennis shoes. The same day, the Security Director for UPS sent out a security
9 alert to the campus advising of a suspicious male being seen in the women's restrooms. (Count III)

10 On February 22, 2017, UPS student K.G. reported that around 7:45 am she walked into the first floor women's restroom in
11 Weyerhaeuser Hall and noticed large black tennis shoes in the farther stall. She recalled the campus security alert about the
12 suspicious male in women's restrooms and got nervous and left. About an hour later, she returned and saw the same shoes
13 under the same stall door. She left the restroom and when she looked back saw the person wearing the shoes entering the
14 male restroom as the women's restroom door was closing.

15 K.G. contacted security who entered the male restroom to find a male, later identified as the defendant, standing in a
16 restroom stall placing a cell phone in the metal toilet seat cover dispenser. One of the security officers identified the
17 defendant as the same individual he had been contacted about and observed in the January incident. Security retrieved the
18 "cell phone" which turned out to be an iPod in the toilet seat dispenser and the defendant admitted to taking pictures, but said
19 they were just for him.

20 Police arrived shortly after and after initially providing a false name, the defendant identified himself as ADAM
21 RANDOLPH. Detective Yglesias ran a records check and determined the defendant was a Level I sex offender with a
22 conviction for attempted voyeurism in 2006 from King County and a 2011 conviction from Oregon for sexual abuse in the
23 third degree. The Pierce County Sheriff's Department later reclassified him as a Level 2 sex offender after discovering the
24 2011 conviction had been overlooked.

25 Police obtained a search warrant for the iPod and located 8 videos of interest, all from February 22, 2017. Detective
26 Yglesias took screen shots of the women's faces and with the assistance of the UPS Security Director, was able to identify
27 the women in the videos. Brief descriptions of the videos are as follows:

28 · Taken at 7:26 am, a camera is held underneath the partition of another stall further away to view the feet and lower legs of
29 a person appearing to sit on the toilet. After using the toilet, the person flushes the toilet, leaves the stall and the camera re-
30 positions to between the crack in the door while the woman washes her hands. K.G. confirmed she is the woman in this
31 video. (Count IV).

· Taken at 7:33 am, a camera is held underneath the stall next to it to view a person's shoes. The camera is re-positioned
above the stall and the woman is seen from overhead using the toilet. The camera is re-positioned through the crack of the
door and to view the woman at the sink. E.L. confirmed that she was the woman in the video and had used the bathroom
that morning. (Count V). The camera is re-positioned under the stall as another woman enters and uses the toilet. The
camera is re-positioned in the crack of the door and briefly shows the suspects lap who appears to be sitting on the toilet

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3 with pants down. The camera is re-positioned to view the woman washing her hands and leaving. E.S. confirmed she was
4 the woman in the video and confirmed she uses that bathroom and would have been there that day. (Count VI).
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6 · Taken at 7:39 am, a camera is held underneath a stall and a side view of the entire lower half of a person is seen as they
7 use the toilet. They stand up and pull up their pants and the camera is re-positioned in the door crack to observe the woman
8 at the sink. J.T. confirmed she was the woman in the video and had used the bathroom that day. (Count VII).
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10 · Taken at 8:20 am, a camera pans to the floor as a person walks into the stall next door. The camera is re-positioned over
11 the top and shows the woman using the toilet. When she finishes, the camera is re-positioned to the crack in the door and
12 views the woman at the sink. C.H. confirmed she was the woman in the video and had used that bathroom that morning.
13 (Count VIII). The video continues and the camera shows another person entering the stall next door. The camera is
14 positioned over the top of the stall and observes the woman using the toilet before pulling up her underwear and pants. The
15 camera is re-positioned to view her at the sink washing her hands. C.P. confirmed that she was the woman in the video and
16 used that restroom that day. She also recalled noticing large black shows in another stall. (Count IX).
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18 · Taken at 8:28 hrs, the camera pans down to show a person in the farthest stall from the viewer who appears to be the same
19 person as in the video taken at 7:26 am. The camera is re-positioned in the door crack as the woman goes to the sink and
20 then quickly moves when it appears as if the woman is looking at the camera. K.G. confirmed she was also the woman in
21 this video and had gone to the bathroom twice that morning before contacting security as described above. (Count X).
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23 Detective Yglesias also obtained a search warrant for the Apple iPod user information and confirmed the defendant's name
24 and address matched the owner information for the iPod. She contacted the defendant who stated he did not want to make
25 any statements at this time.
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27 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT
28 THE FOREGOING IS TRUE AND CORRECT.
29

30 DATED: November 30, 2017.

31 PLACE: TACOMA, WA

/s/ CHELSEY MILLER

CHELSEY MILLER, WSB# 42892

Deputy Prosecuting Attorney