

No. 16-273

In the
Supreme Court of the United States

GLOUCESTER COUNTY SCHOOL BOARD,
Petitioner,

v.

G.G., BY HIS NEXT FRIEND AND MOTHER,
DEIRDRE GRIMM,
Respondent.

**On Writ of Certiorari
to the United States Court of Appeals
for the Fourth Circuit**

**BRIEF OF *AMICI CURIAE*
PUBLIC SAFETY EXPERTS
IN SUPPORT OF PETITIONER**

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INTERESTS OF AMICI CURIAE¹

The amici curiae are two experts in public safety with decades of combined experience in law enforcement and nationally recognized research and writing about the behavior of sex offenders.

Kenneth V. Lanning has spent more than forty years professionally studying the criminal behavior of sex offenders and deviant sexual behavior. As an FBI Special Agent he was assigned to the FBI Behavioral Science Unit (BSU) and the National Center for the Analysis of Violent Crime (NCAVC) for 20 years (1981-2000). In his professional work he focused primarily on behavioral analysis of sexual offenses of all kinds, especially those against children.

As one of the world's leading experts in the dynamics of sex offenses and the real world behavior of sex offenders Mr. Lanning has spent decades analyzing and understanding how sex offenders commit their crimes and how their victims respond.

His expertise, conclusions, and observations concerning sex offender and victim behavior are therefore based on the totality of his reflective experience from decades of being simultaneously involved in training, research, and case consultation. At the BSU, Mr. Lanning was able to consult on and evaluate thousands of sex offense cases, generally

¹ In accordance with Rule 37.6, no counsel for a party authored this brief in whole or in part, nor did any person or entity, other than amici and their counsel, make a monetary contribution to the preparation or submission of this brief. The parties consented to this filing. Their letters of consent are on file with the Clerk as required by Rule 37.2(a).

with full access to case investigators and their complete investigative and evidentiary files.

Mr. Lanning has published several monographs and numerous articles for scholarly and professional journals, including the seminal work: *Child Molesters: A Behavioral Analysis*, monograph published by National Center for Missing & Exploited Children (1986), now in its 5th edition (2010). Mr. Lanning has provided instruction to well over 50,000 law enforcement officers, prosecutors, social workers, mental health and medical personnel, judges, and other professionals all over the United States and throughout the world on topics including Crime Prevention, Evaluation of Sex Offenders, Sexual Victimization of Children, Deviant Criminal Sexuality, Nuisance Sex Offenses, Sexual Homicide, and Sexual Exploitation of Children. Mr. Lanning received the Outstanding Professional Award from the American Professional Society on the Abuse of Children in 1996.

Law enforcement agencies and child protection organizations across the country continue to use Mr. Lanning's work as the foundation of their approach to investigating and preventing sex offenses.

Tim Hutchison is a retired sheriff with over 33 years of experience in law enforcement. He was elected Sheriff of Knox County, Tennessee in 1990 and re-elected four times. The City of Knoxville and the University of Tennessee are in Knox County. Mr. Hutchison was responsible for setting public safety for a County with a population of approximately 400,000. He was also responsible for developing and

implementing public safety policy for the entire county.

While Sheriff, Mr. Hutchison continually worked to identify problem areas and changing criminal behavior patterns. He was appointed to sit on the National Institute of Justice's Cyber Crime task force and assisted that group in writing law enforcement field investigation books about investigating cybercrime. In 1998, the National Sheriffs' Association selected Mr. Hutchison as National Sheriff of the Year.

During his career Mr. Hutchison made hundreds of arrests, for everything from minor misdemeanor offenses to thefts and sex offenses to murder. Sheriff Hutchison's opinions are based on his experience as the Chief Law Enforcement Officer in Knox County and the extensive public safety training he received during his law enforcement career. He has personally been on the scene of sexual assaults and personally arrested and helped prosecute male sex offenders.

SUMMARY OF ARGUMENT

The lower courts have prevented the Gloucester County School Board from implementing a policy of permitting use of multi-user restrooms (and other intimate facilities) based on physiological sex, effectively requiring the public school to adopt a gender identity-based access policy for these intimate facilities. Such a policy markedly increases the risk of sex offenses—especially against innocent female students.

The threats to public safety come not from transgender individuals themselves, but from male sex offenders pretending to be transgender as a ploy to gain access to bathrooms or other intimate facilities. The prospect of increased sex offenses will harm female victims, including students, even if the perpetrators are never caught or prosecuted. These are not victimless crimes.

The reality of increased numbers of sex crimes as a result of subjective gender identity-based access policies is not merely theoretical; it has already been documented in numerous public reports of malfeasance. Yet these documented cases underrepresent the likely increased prevalence of sex offenses facilitated by the types of access policies advocated for by the Respondent. Existing crime reporting statistics are known to under-represent so-called nuisance sexual offenses like voyeurism and exhibitionism. Finally, existing laws against nuisance sexual offenses are ill-equipped to prevent the harms of increased sex offenses that will come from increased adoption of gender identity-based access policies.

ARGUMENT

I. Gender Identity-Based Access Policies have considerable risk of facilitating sex offender criminal behavior.

A. Public safety risks come from male sex offenders, not transgender individuals.

The safety risks concomitant with gender identity-based non-discrimination policies with respect to private facilities have little to do with individuals who are transgendered and more to do with individuals who might claim or pretend to be transgendered., The risks of nonviolent sex crimes from voyeuristic and exhibitionist individuals come from those who would falsely claim or pretend to be transgendered. In other words, the problem comes from males who are not really transgendered but who would exploit the entirely subjective provisions of a gender identity-based access policy—or even changed social norms about facility access—to facilitate their illicit sexual behavior.

The Petitioner here, like other policy makers, is rightly concerned with non-transgender male sex offenders who prefer female victims and who will use gender identity-based access policies to obtain better access to their victims. Carried to its logical conclusion, the preliminary injunction issued by the district court below would effectively force the Petitioner to allow a physiologically female student who identifies as male to use the boys' restroom, and would mean the policy adopted by the Gloucester County School Board to separate restrooms and locker rooms based on biological sex is prohibited by

Title IX. Accordingly, federal law has been interpreted to mean that restrooms and locker rooms in a public high school must be open to use based on no more than a person's claimed sense of gender identity.

This "internal sense" standard opens the door for would-be sex offenders to take advantage of these policies to facilitate and escape responsibility for their offenses. If a male sex offender claims a right to be in a privacy-laden location, and his internal sense of gender identity controls, it will be harder to prevent crimes from occurring in the first place. A perpetrator's ability to claim a female gender identity will hamper law enforcement officers in attempting to enforce trespass laws of neutral applicability, and will thus undermine those laws' effectiveness in deterring such offenses.

Considering the creative and clever techniques sex offenders have used to facilitate their crimes and the frequent need for law enforcement to prove intent, gender identity-based access policies pose significant risks to public safety and privacy. Forcing public institutions to follow a gender identity-based access policy runs a considerable risk of facilitating sex offender criminal behavior.²

² The amici experts base their arguments on a consensus view of criminality, not contested views of morality. Officers are employed to enforce the penal code and not the Ten Commandments. Child molestation, rape and other sex crimes are of professional interest to the law enforcement investigator because they are crimes, not because they are sins.

Critically, women and children using public facilities are often in a vulnerable position. Law enforcement is generally aware that 96% of single-victim assaults are committed by males. These areas are already a target for sex crime predators. Focusing the public safety analysis on the legitimate concerns of transgendered individuals runs the risk of ignoring the safety and privacy risks these policies inevitably create for women and young girls.

Voyeurism and exhibitionism can inflict serious emotional and psychological harm on their victims. The personal safety and well-being of women and children should not be placed at increased risk based only on the uncorroborated or unverified gender identity claims of a group of individuals seeking to use gender restricted public facilities.

Without question, a gender identity-based access policy would allow many individuals to make legitimate claims to access a bathroom, locker room or shower. But it would also allow many access claims by male sex offenders who are known to use deceit to engage in need-driven, high-risk criminal behavior, to say nothing of immature males seeking cheap thrills with little regard for the effect on victims.

Numerous academic studies document the harms felt by female victims of male sex offender crimes, including the crimes of voyeurisms and exhibitionism. For example, a 2016 study of undergraduate students found that 61.7% of the female victims and 50.0% of the male victims reported feeling violated or disgusted; 12.8% of the women and 8.3% of the men felt angry or upset, and 15.0% of the women and 8.3%

of the men felt scared or shocked. Stephanie K. Clark, et al. “*More Than a Nuisance: The Prevalence and Consequences of Frotteurism and Exhibitionism,*” *Sexual Abuse* 28(1):3–19 (2016). A full 37.0% of female victims were fearful the perpetrator wanted to cause harm. *Id.* 15.3% of the women reported long-term effects of the exposure incident. *Id.*

These results are consistent with past studies. In one 1978 survey, the victims were asked to rate how distressing they found their first exposure experience: 41.4% chose “Moderately” (26.3%), “Severely” (11.3%), or “Very severely” (3.8%). Daniel J. Cox & Betsy McMahon, *Incidents of Male Exhibitionism in the United States as Reported by Victimized Female College Students*, *Int’l J. of Law and Psychiatry*, 1:453–457 (1978). And asked to rate how severely this experience affected their attitudes toward themselves as women, a total of 15% responded, “Moderately” (6.0%), “Severely” (7.5%), or “Very severely” (1.5%). *Id.*

Similarly, a 1988 survey at a broader range of universities, when victims were asked to rate how distressing they found their first exposure, 42% responded “Moderately” (24%), “Severely” (12%), or “Very severely” (6%). Daniel J. Cox, *Incidence and Nature of Male Genital Exposure Behavior as Reported by College Women*, *J. of Sex Research*, 24:227–234 (1988). Asked to rate how severely this experience affected their attitudes toward themselves as women, 14% responded, “Moderately” (8%), “Severely” (4%), or “Very severely” (2%).

B. Male sex offenders are likely to engage in harmful exhibitionism and voyeurism.

The increased public safety risks from gender identity-based access policies for public, multi-user rest rooms, changing areas, and showers are likely to involve so-called nuisance sex offenses, such as exhibitionism and voyeurism. The risks are less likely to manifest as violent sexual assaults, such as rape, although those may sometimes occur.

Here, as elsewhere, referring to all sex offenders as “sexually violent predators” fuels inaccurate stereotypes and denies the diversity of such offenders. Looking for “evil sexual predators” can hinder recognizing many serious sex offenders. The amici experts’ concerns stem from sex offenders exploiting gender identity-based access policies to act out their paraphilic disorders and by immature males who consider it fun to look at naked girls and women or to expose themselves to girls and women in these settings.

Male sex offenders will use the cover of gender-identity-based rules or conventions to engage in peeping, indecent exposure, and other offenses and behaviors in which the connection to sex is less obvious. Unfortunately, the enactment of access policies like the one advocated for by the Respondent, or the adoption of similar social customs, make it even more difficult to catch those who would otherwise be clearly violating laws prohibiting indecent exposure or peeping.

Under such policies, the very real victims of such conduct—women or young girls deliberately exposed to the male genitals of an exhibitionist, for example—would be forced to consider whether the exposure was merely the innocent or inadvertent act of a transgendered individual, or the beginning of a more serious sex crime. And it is quite rational for a woman to be afraid of encountering male sex offenders willing to commit nuisance crimes; after all, they are far more common in society than the small group who identify as transgender. Stephanie K. Clark, et al. *More Than a Nuisance*, supra p.8.

Moreover, by linking facility access to self-claimed gender identity, victims may be unwilling to report an exhibitionist appearing to be a male for fear of being accused of bigotry or gender identity discrimination. As a result, reporting of public-facility sex crimes is likely to decrease as a result of these policies and similar social conventions, even as the actual number of offenses increases.

The risk of allowing biological males into facilities reserved for women and girls is real, and is illustrated by behavior already engaged in by some male sex offenders in facilities reserved for men:

- Using video cameras hidden in a bag to surreptitiously record partially dressed and urinating boys;
- Meeting male partners, including children, to engage in sexual activity;
- Going into male restrooms to get sexually aroused from the sound of males urinating;

- Using “horseplay” in male locker rooms and showers as part of their grooming of male victims;
- Setting up cameras in dressing rooms to record people changing clothing;
- Stealing women’s or children’s underwear from locker rooms;
- Joining youth-serving organizations to use showers, restrooms, and sleeping arrangements to groom and sexually victimize boys;
- Exposing their genitals for sexual gratification in male athletic facilities.

While unpleasant to contemplate, this sexual exploitation occurs already in public restrooms or locker rooms limited to male use. If women’s facilities become available to heterosexual males who merely claim or pretend to be transgender, it can be reasonably expected that similar sexual offenses will occur in those facilities as well. Since most male sex offenders against adults prefer female victims, the problem until now was somewhat limited and dealt with on a case-by-case basis. Not so if intimate facilities heretofore reserved for females are opened up based on subjective gender identity-based access policies.

Even worse, nuisance sexual offenses such as voyeurism and exhibitionism can lead to more violent sexual crimes. Some sex offenders are known to start by peeping, stealing female underclothing, and other similar low-level offenses. Some offenders start graduating to more serious sexual crimes and some move on to actual rape. Moreover, some offenders simply alternate back and forth between so-called “nuisance” offenses like voyeurism and exhibitionism

and more serious crimes like rape, depending in part on the opportunities presented to them.

The public safety risks from gender identity-based access policies are not limited to the worst male sex offenders. Immature males, too, will have increased access to intimate facilities based on these policies. Some adolescent high school boys or college males (who are not abnormal or sexual predators) might want to get into the girls' locker room. They may or may not realize that such activity is illegal, and they may or may not consider its effect on victims. The raging hormones and immaturity of young males drive the activity. Allowing a man to use woman's rest room, locker room, dressing room, shower, or dormitory room simply because he says he feels like a woman goes against thousands of years of human experience, ignores the reality of the sex drive of a very large majority of males, and ignores the potential for concomitant criminal activity.

In the age of ubiquitous smart phones, there are increased incentives for sex offenders to take advantage of access policies. Small, easily hidden smartphones have excellent cameras and video capture capabilities. As everyone knows, the images captured by a sex offender on a modern smartphone are extremely high-quality, and can be instantly uploaded to the internet.

The amici experts conclude the risks of sex crimes such as exhibitionism and voyeurism and other behaviors will be substantially higher if gender identity-based access policies or similar social conventions are adopted. Allowing a man, based only

on his claim to be transgendered woman, to have unlimited access to women's rest rooms, locker rooms, changing rooms, showers, etc. will make it easier for the type of sex offense behavior previously described to happen to more women and children.

C. Substantial evidence shows documented sex offenses taking place in gender-identity-based access facilities.

The reality of non-transgender male sex offenders taking advantage of any opportunity to increase their access to potential victims has already been documented in numerous reported incidents. The public safety risks are not merely theoretical. There are numerous publicly reported examples of that happening in jurisdictions and facilities with gender identity-based access policies in place.

For example, as the New York Times recently reported, a “transgender woman” was charged with secretly taking pictures of an 18-year-old woman changing in a Target fitting room. Niraj Chokshi, *Transgender Woman is Charged with Voyeurism at Target in Idaho*, N.Y. Times, July 14, 2016, available at <https://goo.gl/tTZfdU>. This incident follows the national retail chain's announcement in April, 2016, that it would allow customers to use restrooms or fitting rooms corresponding to gender identity. There are other reported instances of voyeurism in Target stores following this announced policy. *E.g.*, WFXT – Boston, *Man accused of filming girls in Target dressing room*, WFTV9-ABC, June 25, 2016, available at <https://goo.gl/g3O4a5> (male accused of taking

photos of a women undressing in a Target changing room, without any allegation of cross-dressing).

Additional publicly reported incidents of voyeurism or exhibitionism in public restrooms or changing facilities are provided in **Appendix A** to this brief.

II. Attempts to deny the increased risks of sex offender activity are mistaken.

A. Crime data underreports the incidents of nuisance sex offenses.

Some proponents of gender identity-based access policies argue that crime reporting statistics show little to no sex crimes occurring in restrooms or similar facilities as a result of increased gender identity-based access policies. These arguments are misplaced.

Crime data collected by the FBI Uniform Crime Reporting (UCR) Program's Summary Reporting System (SRS) and the National Incident-Based Reporting System (NIBRS) reflect the reality of sex crimes occurring. The older and more widely used UCR SRS was set up to track serious crimes more likely to be reported to the police. The SRS now counts only rape cases that were reported to police and cleared by arrest. Statutory sex offenses involving no violence—that is, threats or use of force—are excluded. Thus, sex offenses involving behavior such as indecent exposure and peeping are given a low priority and very limited compilation. It is not easy to get a clear and accurate picture of the incidence of

such “nuisance” sex crimes from UCR, SRS and NIBRS data collected by local police agencies.

It is, however, well-established that “the majority of sexual assaults are not brought to the attention of the criminal justice system.” Stacey Katz-Schiavone et al. *Myths and Facts About Sexual Violence: Public Perceptions and Implications for Prevention*, J. of Criminal Justice and Popular Culture, 15(3):291–311 (2008).

The under-reporting of sex crimes can also be seen in studies of higher education institutions. In a 2016 survey of 459 undergraduate students aged 17–43 (74% female; 26% male) at an urban university in New York City, more than 40% of women and 12% of men reported having been a victim of exhibitionistic behavior. However, only 9% of the women and none of the men reported their victimization to police. Stephanie K. Clark et al., *More Than a Nuisance*, *supra* p.8 A 1978 survey of 405 college women attending five U.S. colleges and universities showed 32% of the women reported having been victims of indecent exposure by a man, but only 15.9% of the victims reported their victimization to the police. Daniel J. Cox, *Incidents of Male Exhibitionism in the United States as Reported by Victimized Female College Students*, *supra* p.8.

Likewise, in a 1988 survey of 846 college women attending a random sample of nine U.S. colleges and universities, 33% of the women reported having been victims of indecent exposure by a man, but only 15% of the victims reported their victimization to the police. Daniele J. Cox, *Incidence and Nature of Male*

Genital Exposure Behavior as Reported by College Women, supra p.8.

Another likely explanation for under-reporting of sex offenses in public restrooms is that many sex offenders are still learning about gender identity-based access policies, which are relatively new. Many sex offenders may not have yet realized how they can use such regulations, ordinances, and policies to facilitate their sex crimes since being transgendered is usually not objectively defined in these policies.

B. Current laws are inadequate to prevent sex offender conduct.

Some people who favor the adoption of gender identity-based access policies claim that existing laws prohibiting trespassing, indecent exposure, peeping, and other sex offenses will keep problems from happening. This is not true.

As explained above, not all sex crimes involve violent sexual assaults. Not all sex crimes are considered equally serious and receive the same amount of investigative or prosecutive attention. The reality is so-called nuisance sex offenses are often given a low priority.

Furthermore, if someone can enter a public facility based entirely upon their “internal sense of gender,” then law enforcement and potential victims alike will be greatly challenged in determining whether a man entering a women’s facility was really transgender or was instead there to commit a sex offense. This makes existing laws less effective at preventing sex crimes in these facilities.

Current laws are just not up to the task of preventing or prosecuting many of the sex offenses—especially so-called nuisance offenses—that will likely result from adoption of a gender identity-based access policy, or even a similar social convention allowing biological men access to women’s facilities. For example, sex offenses that require proof of the defendant’s intent can be difficult to investigate and prosecute. Sex offenders charged with such offenses routinely admit to committing the act, but deny that they had the requisite intent.

It is a mistake to believe that existing laws are sufficient to the task in the context of more open access policies and similar social customs—they are barely up to the job without the presence of such policies that provide a new defense for anyone caught and reported for these crimes in such facilities. There is value in existing criminal laws, but those laws should not be assumed to be a sufficient prophylactic to prevent sex crimes from occurring at increased rates following the adoption of gender identity-based access policies.

CONCLUSION

For the foregoing reasons, and those explained by Petitioner, the decision below should be reversed and the preliminary injunction vacated.

Respectfully submitted,

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APPENDIX

Appendix
List of Relevant Incidents

Description	Source	St
Indecent exposure to child in Target store (appears to have been in men's room)	Austin American Statesman, https://goo.gl/ydoSF3	TX
Just after NDO goes into effect, man uses women's locker room at public pool	King 5 News, https://goo.gl/Hjvm4k	WA
Man dressed as woman arrested for filming women at Potomac Mills Mall	NBC Washington, https://goo.gl/3Kpl6W	VA
Man filming in women's restroom at public park/softball complex	WKRN, https://goo.gl/kfOIt	TN
Man using cell phone to record video in women's restroom on University campus	Orange County Register, https://goo.gl/fUuVza	CA
Man recording others in his bathroom	Mercury News, https://goo.gl/s9VfTZ	CA
Man placed theater tablet computer in rehearsal space restroom	Courier-Post, https://goo.gl/0xj6YU	NJ
Man filming women in bathrooms in his home, their homes	KHQ, https://goo.gl/0ZoEN7	WA

Restaurant manager installed camera in women's restroom	WPLG, https://goo.gl/bc3izw	FL
Junior high boy tapes junior high girl in school restroom; distributes video to others	Cleveland Plain Dealer, https://goo.gl/8kqa2U	OH
Volunteer teacher and choir leader directed children in sexually explicit videos filmed in school bathroom	WPGC, https://goo.gl/hRnmyA	MD
Man tapes women using his restroom	Local 10 (ABC), https://goo.gl/FdkJQ2	FL
Former Chili's manager videotaped 8 women changing clothes/using restroom	WBIW, https://goo.gl/rshu5r	IN
Man videotapes 13-year-old taking a shower with cell phone (saw lens poking out through a sleeve that was hanging in bathroom)	KFOR, https://goo.gl/Df5KJW	OK

Police locate "person of interest" in connection with man videotaping woman while showering in residence hall	KCRG, https://goo.gl/SJs7Im	IA
Man caught hiding in stall of women's bathroom, taking photos of young girls	WGAL, https://goo.gl/zXuHio	PA
Man dressed as woman accused of taking photos of women undressing in Target changing room	East Idaho News, https://goo.gl/MhaEKF	ID
Transvestite lures special needs teen into bathroom and sexually assaulting him	The Hour, https://goo.gl/HIe7wQ	CT
Dishwasher places cellphone camera in employee restroom	CBS New York, NY https://goo.gl/H12kGr	NY
Man places mirror and cell phone under stall in women's restroom	The Advocate, https://goo.gl/WZp336	LA

Man photographs woman up her dress and watching group of children at swimming class (already registered sex offender)	KSDK, https://goo.gl/FDvaEl	IL
Former fire captain/youth football coach videotaped girls as they used his restroom during pool party	The Record, https://goo.gl/GXhJuV	NJ
Former girls' soccer coach produced pornography with minors. Used hidden cameras in locker room and restroom.	WAFF, https://goo.gl/ThGgq6	AL
Man placed hidden camera in Starbucks unisex bathroom	NBC Los Angeles, https://goo.gl/C2bVoL	CA
Two separate incidents of voyeurism in gender neutral restrooms cause U of T to retreat from hardline gender neutrality	The Varsity, https://goo.gl/SGHfBn	Ont
Camera found in Del Taco restaurant restroom	NBC Los Angeles, https://goo.gl/mhPy79	CA

Crossdressing high school teacher charged with preying on 6 female students	NY Daily News, NY https://goo.gl/jnE2aD	
Schwartz dressed in a Barbie costume before entering a women's restroom and attempting to rape a female occupant	NBC San Diego, https://goo.gl/b5ki3f	CA
Crossdresser accused of taking part in luring woman to hotel room and taking part in group sexual assault	Pennlive, https://goo.gl/Fa4cB2	PA
Man dressed as woman filmed women in Antelope Valley Mall Macy's restroom	NBC Los Angeles, https://goo.gl/Vi68SM	CA
Man dressed as woman attempted to take cell phone photos of women in women's-only areas of college campuses	Los Angeles Times, https://goo.gl/Te3tgN	CA
Man wearing only women's panties assaulted 8-year-old girl inside convenience store bathroom	News9, https://goo.gl/bdjtx7	OK
Crossdresser appears in court to face child pornography charges dressed as woman	Click On Detroit, https://goo.gl/A4PB1s	MI

Crossdresser accused of placing sexually explicit ad about little girl on Craigslist	Oregon Live, https://goo.gl/XvXi1k	OR
Man dressed as woman sexually assaulted 17-year old girl	Washington Post, https://goo.gl/nVXm9X	VA
Married man with master's degree and good job attacks woman in apartment, stabbing her three times. Later returns to scene dressed in women's clothing	nbc-2.com, https://goo.gl/upvmpe	FL
Man dressed as woman uses mirror to peer under bathroom stall	Toronto Star, https://goo.gl/lVoowa	Ont
Man claiming to be transgendered assaulted two women at shelters	Toronto Star, https://goo.gl/dqdFoT	Ont

Man in bra and wig found in women's restroom; later admitted to officers he was suspect in earlier voyeurism incident at Everett Community College	Seattle Post-Intelligencer, https://goo.gl/lu9R7A	WA
45-year-old transgender college student with male genitalia exposes self in women's locker room and sauna	ABC, https://goo.gl/aITdkS	WA
Crossdressing man gained trust of Ohio family, then molested children	Review Online, https://goo.gl/UHgGIS	OH
Man dressed as woman approaches children playing; exposes self to them.	CBS Los Angeles, https://goo.gl/zRi6H8	CA
Convicted sex offender dressed as woman went into women's locker room at public pool and talked to several children before being chased down	Oregon Live, https://goo.gl/vuKjTd	OR
Middle-aged man dressed as woman enters women's restroom asking to shake hands with women	Patch.com, https://goo.gl/lybGmM	CA

Crossdressing man accused of rape after home invasion	CBS Local Sacramento, https://goo.gl/HLt140	CA
Man dressed as woman to access Berkeley locker room, used cell phone to photograph women	Boston.com, https://goo.gl/zJfDI1	CA
Crossdressing man looks into apartment windows	WSBTV, https://goo.gl/f6u8NF	GA
Man dressed as woman in Wal-Mart takes clothes off in front of children	Northwest Georgia News, https://goo.gl/Comnfi	GA
Serial sex offender admits to “decades” of offenses including photographing teenagers, videotaping couples having sex and stealing women’s panties	Daily Camera, https://goo.gl/Dc9Gki	CO
Man dressed as woman was wearing fake breasts and wig while loitering in women's restroom. Previously arrested on child molestation and indecent exposure charges	Mercury News, https://goo.gl/MnqJy4	CA

Man dressed as woman masturbates in public, attempts to lure 10 and 12 year old girls into restroom	Fox16, https://goo.gl/vVks5v	AR
Crossdressing man exposes himself to woman on street	News9.com, https://goo.gl/lr6eAY	OK
Man dressed as woman takes photos in women's restroom on Purdue campus (flip phone camera under stall door)	Purdue University News, https://goo.gl/xbZHSy	IN
Man dressed as cheerleader enters girls locker room at high school	Tribune-Review, https://goo.gl/uVvm1w	PA