

**FILED
07-15-2021
CIRCUIT COURT
DANE COUNTY, WI
2021CF001568**

JSL IA 7/15/2021 @ 1:30PM

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

STATE OF WISCONSIN
Plaintiff,

vs.

CHANDLER M HALDERSON

4595 Oak Springs Cir

DeForest, WI 53532

DOB: 03/15/1998

Sex/Race: M/W

Eye Color: Blue

Hair Color: Brown

Height: 5 ft 10 in

Weight: 150 lbs

Alias:

Defendant,

Ref. Agency: Dane County Sheriff's Office
DA Case No.: 2021DA005633
Assigned DA/ADA:
Agency Case No.: DCSD 21-257864
21da5633ATN: 13006500453602
13006500452331

CRIMINAL COMPLAINT

For Official Use

The below-named complaining witness being first duly sworn states the following:

Count 1: FIRST DEGREE INTENTIONAL HOMICIDE

The above-named defendant On and/or between July 1, 2021 and July 8, 2021, in the Village of Windsor, Dane County, Wisconsin, did cause the death of Bart A. Halderson, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a) Wis. Stats., a Class A Felony, and upon conviction shall be sentenced to imprisonment for life.

Count 2: FALSE INFO ON KIDNAPPED/MISSING PERSONS

The above-named defendant On and/or between July 1, 2021 and July 8, 2021, in the Village of Windsor, Dane County, Wisconsin, the defendant did deliver written and/or oral communication with intent to induce a false belief that the defendant had knowledge of the whereabouts or physical condition of a missing person is guilty of a Class H felony, contrary to sec. 946.48(1), 939.50(3)(h) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

Count 3: MUTILATING A CORPSE

The above-named defendant On and/or between July 1, 2021 and July 8, 2021, in the Village of Windsor, Dane County, Wisconsin, did dismember a corpse with the intent to conceal a crime, contrary to sec. 940.11(1), 939.50(3)(f) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

Count 4: HIDING A CORPSE

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The above-named defendant On and/or between July 1, 2021 and July 8, 2021, in the Village of Windsor, Dane County, Wisconsin, did hide a corpse with the intent to conceal a crime, contrary to sec. 940.11(2), 939.50(3)(f) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

FACTS:

Your complainant is a Court Officer with the Dane County Sheriff's Office and for this complaint is relying on the written report(s) submitted by Dane County Sheriff's Deputy(ies) John Nelson Joshua Seeley, Hayley Collins-LaFevre, Greg Leatherberry, Daniel Feeney, James Plenty, Erik Schneider and Detective(s) Sabrina Sims, Brian Shunk, William Hendrickson, Elizabeth Allen, Leslie Keith, Brent Baverstock, George Mayerhofer, and Timothy Blanke.

Initial Report

Deputy Nelson reports on July 7, 2021 at approximately 11:25 AM, a male subject approached the front doors to the Northeast Precinct and requested to make contact with an officer to file a missing persons report. This subject verbally identified himself as CHANDLER HALDERSON (the defendant, "Chandler" hereinafter, who was also identified via his Wisconsin driver's license) and stated he lives at 4595 Oak Springs Circle in the Village of Windsor, Dane County, Wisconsin.

Chandler said he wished to report his two parents missing and stated they had left their residence at 4595 Oak Springs Circle sometime around Friday and had not been seen since. He believed they possibly went up to a cabin of theirs that they own and provided an address on Sawyer Lake Road in White Lake, Langlade County, Wisconsin.

Chandler told Deputy Seeley his parents left for their cabin in Langlade County on Friday morning, July 2, 2021, and hadn't returned yet, which was not their usual behavior. Chandler identified his parents, Bart A. Halderson ("Bart" hereinafter) and Krista R. Halderson ("Krista" hereinafter).

Chandler reported his parents, Krista and Bart, had left for their cabin on Friday morning at approximately 6:00 AM and had been picked up by friends. Deputy Seeley asked Chandler if he knew who the friends were who had picked them up and he stated no. Chandler said Krista and Bart were going to be going up to the cabin to work on a water pump and a fire pit which had possibly been damaged by a recent storm.

Deputy Seeley asked Chandler why he thought his parents were missing. Chandler stated they were supposed to have been back on Sunday night or Monday and as of today, they still had not come home nor had he been in any contact with them. Chandler stated he thought it was odd and he had also been trying to call them; however, it went straight to voicemail. After being provided the cell phone numbers for both Krista and Bart, Deputy Seeley also attempted to make phone contact with them; however, the phones went straight to voicemail.

Deputy Seeley arrived at the residence located at 4595 Oak Springs Circle. After entering the residence, Deputy Seeley immediately observed there appeared to be sections removed of the

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flooring, as well as, what appeared to be outlines of a half wall immediately next to the front door which was no longer there.

Deputy Nelson asked if there were any firearms in the home, and he stated there were no firearms at the home; however, there was a "30 ought 30" hunting rifle at the cottage.

Detectives Sims and Shunk, interviewed Chandler in the evening of July 7, 2021, at the home. Chandler told many details to the detectives, including that he has a girlfriend (whose name forms the initials CMM) and her family had a farm in the Cottage Grove area. Chandler allowed detectives to look through his cellular phone, and they saw multiple phone calls from CMM's mother's girlfriend (whose name forms the initials CAL).

Chandler told Det. Sims he helped his parents pack up tools to take up north with them, which included a pipe wrench, a hatchet, and gas cans for the chainsaw. Additionally, Chandler told Det. Sims he received a text from his mom on Sunday, July 4th. While at the house, Det. Sims and Det. Shunk looked around, when Chandler showed them specific areas of the house, and they did not see cellular phones, nor did he identify any phones there as belonging to his parents.

Det. Shunk asked Chandler if he saw or heard his parents leave at any point in the morning or throughout the night. Chandler stated he didn't hear or see anything. Chandler said he woke up around 6:15 AM on Friday, July 2, 2021, and his parents were gone. Chandler said all of the items he helped pack were gone, and the door leading from the basement to the driveway was closed but unlocked. Chandler said this door is normally locked at all times, but thought his parents could've left it unlocked when they left.

Chandler said the next time he heard from his parents was on Sunday, July 4, 2021, at approximately 11:00 AM Chandler said Krista had texted him, stating they were going to White Lake for a parade, and they'd be home either Monday night or Tuesday morning. Det. Shunk asked if his mom or dad had ever called him. Chandler said he never heard from his dad, and the text was the only communication he had with his parents after they left. Det. Shunk asked Chandler if it was normal for his parents not to contact him when they were at the cabin. Chandler said there isn't cell phone service at the cabin, so it's normal not to have contact with them.

Det. Shunk told Chandler he was aware both of his parent's vehicles were in the garage. Det. Shunk asked Chandler how his parents would've travelled to the cabin. Chandler said his mom mentioned that one of their friends were going to pick them up and drive to the cabin. Chandler was not sure which friends this would be.

Det. Shunk asked Chandler to describe his parent's vehicles. Chandler stated his dad (Bart) drives a Subaru Outback, and his mom (Krista) drives a Volkswagen wagon. Chandler said he is also able to drive both of the vehicles, as he doesn't have a vehicle currently. Det. Shunk asked Chandler if he has driven either of the vehicles since his parents had left. Chandler stated he has driven both of the vehicles. Chandler said he has only driven to the east side of Madison to his CMM's house, and one other trip to the Sun Prairie area. Chandler said he hasn't driven anywhere else as his concussion symptoms prevent him from driving too far. Chandler also told Det. Shunk he had remembered assisting his mom with packing her medications on Thursday, July 1. Det. Shunk asked Chandler why he would help Krista pack

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medications. Chandler said he was bored and was trying to help his parents. Chandler said he removed his mom's medications from the bottles and placed them into snack sized Ziploc bags. Chandler said he packed enough medications to last Krista through Saturday, July 10.

Chandler was asked the normal route his parents would take to get to the cabin. Chandler said they would head north towards Stevens Point, and then towards Antigo. On return trips, Chandler said his parents would routinely come back through Oshkosh. Chandler did not know the names of any highway his parents travel.

Missing Person Certification Forms

Det. Sims reports she had assisted on the interview of Chandler with Det. Shunk. Det. Sims took photographs of the couple's vehicles (a dark gray Volvo Station with a Wisconsin license plate ending in 70U and a blue Subaru Outback with Wisconsin license plate ending in 69U) which were located in the garage. She also took a laptop computer from the residence and packaged it as evidence.

Det. Sims reports Chandler also signed the missing person certification forms for Bart and Krista.

PS's Statement

Deputy Nelson reports on the counter of the kitchen table of the home at 4595 Oak Springs Circle, there was a note according to Chandler which had been left by his mother. In the note it basically stated, "I hope you're doing okay and if you need anything contact [the first name of an individual whose name forms the initials]."

Deputy Nelson spoke with an individual whose name forms the initials PS. Deputy Nelson asked PS if it was unusual for Krista to not show up for work and she said this was very unusual for her. PS described Krista as being a very responsible person who also was very time-committed. She did not believe Krista would just not show up for work without at least calling work to report to them that she was not going to be there.

LM's Statement

Deputy Collins-LaFevre made contact with another neighbor, whose name forms the initials LM. Deputy Collins-LaFevre explained they were concerned about overdue motorists, and was inquiring if they had seen any suspicious activity at Bart and Krista's home over the last several days. LM told Deputy Collins-LaFevre she had just recently looked towards the house and noticed the small windows on the garage door were open. She told Deputy Collins-LaFevre she has never seen the small garage door windows open and thought it was suspicious.

DJK's Statement

Det. Hendrickson spoke with co-worker and family friend, whose name forms the initials DJK. DJK worked with Krista, and he noted she had not showed up for work on Friday, July 2, 2021, and this was not pre-arranged.

DJK reported the following: He began getting phone calls and texts from coworkers beginning on July 2, 2021 and continuing on July 5, 2021, informing him that Krista had not shown up for work, which again was very unlike her,. He had made steps to attempt to get into contact with

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her via phone, all with negative results. All of his attempts to get in contact with Bart and Krista went unanswered which again was very unusual.

DJK told Det. Hendrickson he decided to stop over at the residence on July 2, 2021 at 4:30 PM. When he arrived at 4595 Oak Springs Circle, he noted both vehicles were in the garage. He thought this was unusual, given the fact they were both supposed to be out of town. He also noted looking in the front door, there was a table which was on its side that he believed was similar to that of a coffee table. DJK advised he had been inside the residence several times in the past, and advised this coffee table was in the dining room based on his best recollection.

DJK advised he as well as an individual (whose name forms the initials JM) began knocking on the door and windows in an attempt to get someone to come to the door. After a number of minutes of doing so, they saw a hand or arm move the curtains away in one of the lower level windows, specifically the lower part of the tri-level home, closest to the front door, or the far left window as one's looking at it from the front. DJK advised they realized the person's arm they were seeing was that of Chandler, and there was communication by means of pointing to go to the side door, at which time the parties, specifically Chandler, DJK and JM, met at the side door to the garage.

DJK stated it was apparent to him that Chandler had just gotten out of the shower, as he was very wet with a towel wrapped around his lower part of his body, and he was in the process of putting on at-shirt.

JM advised she was somewhat embarrassed, as it appeared as though Chandler was essentially half naked, but they noted he had a piece of gauze, or some other type of bandage on what they initially thought was his right foot, but may have been his left foot in the vicinity of his big toe.

DJK advised this was when it had first been confirmed by Chandler, that his parents had been picked up by another couple, sometime around 5:00 AM, for some type of a problem at the cabin. Chandler apparently did not know what exactly the problem was, nor the identity of the individuals they had traveled with.

DJK advised he also asked Chandler about what had happened to his foot during this brief contact. Chandler had made a comment he had thrown a ball or was playing with the dogs and had broken the fireplace, which DJK presumed was the breakage of the doors on said fireplace which might have caused Chandler to cut his foot. DJK advised Chandler said something to the extent that there was "blood everywhere" inside the residence as a result of this cut; however, DJK nor JM saw any blood inside the residence when they were attempting to make contact with someone minutes earlier, but at the same time, advised they were not really looking for it either.

During Det. Hendrickson's conversation with DJK in regards to his contacts with Chandler at the garage, he was able to confirm that both the Outback (which was operated by Bart) as well as a Volvo Wagon (which was operated by Krista) were inside the residence, and there was a brief discussion with Chandler about the vehicles being there. Chandler had reiterated they (Bart and Krista) had been picked up earlier that morning by this unknown couple. Chandler

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advised he had been sleeping at the time they were picked up, and again reiterated it was some sort of an emergency with the cabin.

DJK reports on July 4, 2021 at approximately 11:06 am, he had cellular phone contact with Chandler. It was during this conversation, DJK reported that Chandler disclosed to him he had "gotten a hold of them, " referencing his parents (Bart and Krista); however, DJK was not certain as to how this had transpired via cell phone or text message, but at any event, Chandler was disclosing to him that he had spoken with his parents, or communicated with his parents, and that everything was "fine." DJK advised he was also told by Chandler that his parents were going to be expected back on "Tuesday."

MS's Statement

On July 7, 2021, Det. Blanke made contact with an individual whose name forms the initials MS. MS reported the following: After law enforcement personnel left the Halderson residence (4595 Oak Springs Circle), she and her husband invited Chandler over to their house for dinner. Chandler had made several statements regarding his beliefs as to his parents' whereabouts and activities which she found completely inconsistent with her observations.

MS told Det. Blanke that Chandler's claim of the Bart and Krista going to the cabin with an unknown other couple driving was completely out of character for Bart and Krista. MS stated Krista has always brought their own vehicle to the cabin along with any guests.

MS also stated that Chandler claimed Bart took a large amount of cash with him to the cabin as well. She considered this very unlikely and described Bart as a "cheapskate" and said to her knowledge, he did not keep large amounts of cash in the house and she had never seen him with any significant amount of cash on his person.

MS went on to tell Det. Blanke that Chandler claimed his parents took a significant amount of alcoholic beverages with them to the cabin. She found this to be completely out of character as well and very unlikely. She said when her and her husband had visited the cabin with Bart and Krista, typically, they do bring a bottle of wine for all to share around the meal; however, Bart and Krista typically do not bring any alcohol to the cabin and are very light drinkers themselves.

MS said she also found it suspicious when Chandler claimed his mother had not reached out to him in several days. She described Krista as a very doting parent who was very involved in both of her sons' lives and would check in at least once per day if not more often, likely with both of her sons.

Observations at 4595 Oak Springs Circle

On July 7, 2021, Det. Shunk stated Chandler showed them around the house during the interview. Det. Shunk's impression was the house was well-kept, although there was some remodeling going on. In the basement, Det. Shunk saw the fireplace and noted there was a piece of glass missing. Chandler made the same explanation to them about the dogs breaking it, and showed them where he got a piece of glass stuck in his left big toe. Det. Shunk stated the injury looked like a "blood blister" and did not appear to be recent. Both Det. Sims and Det. Shunk noted they did not see any sign of "blood everywhere," in the areas Chandler showed them around.

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CMM's Statement

On July 7, 2021, Det. Allen made contact with CMM. CMM identified her mother (whose name forms the initials DM) and DM's girlfriend (CAL). CMM reported the following: She was with Chandler numerous times during the time frame of July 1st through July 8th, 2021.

CAL's Statement

Det. Allen learned CAL lives in the 3500 block of Earlwyn Rd., Cottage Grove, Dane County, Wisconsin. Det. Allen spoke with CAL on July 8, 2021, and she told Det. Allen that Chandler came to the property on Monday, July 5th, with his family's blue Subaru.

CAL reported the following to Det. Keith: Beginning at 5:30 PM, Chandler showed up there at the property (in the 3500 block of Earlwyn Rd.), with the blue Subaru Outback, on Monday, July 5, 2021. She spoke to him, as he stood outside; she asked if he was ok, and he said he was not ok. Chandler said to her he was having problems reading word and numbers. She asked him if he was ok to be driving, and he said he was getting lost a lot, but otherwise, he was ok to drive. Chandler asked to go swimming (at their pool on the property), and she said yes. He walked up to the pool and was gone for 1-1.5 hours. He returned, and she noticed he was not wet, and later, she noticed the cover was not off the pool.

Eventually, CAL said she and her partner drove out to the shed, and she could see Chandler's Subaru was parked next to the large (farthest south) shed and the hatchback door was open. They did not see him around the shed.

CAL said while they were in the pool she looked south of the shed and saw Chandler near the grass and wood line. After she saw Chandler walking down the wood line she lost sight of him for a few moments as he was block by the shed. The next time she saw him was a few moments later when he came around the south east corner of the shead

CAL told Det. Allen, after that, she saw Chandler in the pool, appearing to be washing off, and he looked like he wasn't paying attention to anyone else around.

CAL also stated recently Chandler had been out to the property and the topic of target shooting came up. She said she offered Chandler to come out to the property to join in sometime in the future. This is when Chandler mentioned to her he had a rifle he could bring to target shoot. She could not specifically remember the model of the rifle he said he had. But she did remember it was some kind of foreign military style rifle with a magazine underneath like an "AK". CAL stated she said he could not shoot that rifle on her property because it was too big of a gun for her target area.

CAL also reported sometime in the last week she recalled seeing vultures circling above the woods on her property. She said this was strange and she pointed this out to DM. CAL stated she definitely knew the difference between vultures and other birds.

Search of CAL's Property (in the 3500 block of Earlwyn Rd.)

Det. Baverstock was present when Det. Allen talked with CAL, on July 8, 2021. CAL owns the property and gave consent for DCSO staff to take a look around the property.

Based on the discussion of where Chandler went, Det. Baverstock drove south to the large shed the farthest away from the house. He observed a mowed area to the south of the shed,

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and tire tracks which led to the south, into much taller grass. Det. Baverstock walked into the grass, following the tracks of the vehicle, and noticed it stopped approximately 75 yards to the south, into the woods line. From there, he walked to the west approximately 20 yards, and saw a slight "mound," which was loosely covered in foliage, sticks, and leaves.

Det. Baverstock could see a scuff mark on a fallen tree along the path. After this a pile of dead branches with something underneath them which was not natural to the landscape. Det. Baverstock could not tell what it was so he stepped over this log to get a closer view. Det. Baverstock stood there for a moment to process what it was he was seeing. The more observations Det. Baverstock made led him to determine he was looking at a human torso. Det. Baverstock could see the human remains had been mutilated and dismembered.

Det. Baverstock could clearly see this was a torso, belonging to a white male. It was clothed in gray cargo-type pants, a black belt, with a nylon black rope around the waist, and 3-4 feet of the rope loose and had no shirt on.

Det. Baverstock reports Det. Allen and him returned to the area where the Subaru had been reported parked. Det. Allen then drew Det. Baverstock's attention to a larger rust colored metal tank. The tank had an opening in the side of it. Det. Allen stated there were some tools in the tank. Det. Baverstock looked through this opening and observed a pair of scissors, a saw blade and the handles of what he thought may be a pair of bolt cutters. The inside of the tank was dark and Det. Baverstock was not able to see the full items. Det. Baverstock looked at the saw blade and it appeared to have a slimy appearance with what he thought could be fatty tissue.

Contact with Chandler on July 8, 2021

Det. Shunk reports on July 8, 2021 at 2:38 PM, he received a telephone call from Chandler. Chandler told him he found an "old looking padlock key" ring in his dad's (Bart's) top left night stand drawer. Chandler said he believed these keys to be spares for the cabin. Chandler told Det. Shunk he was "rifling through" all of his parent's items in an attempt to locate any sign of where they went. Chandler said he had given these keys to his brother who was picking the keys up while on his way to the cabin to check for his parents. Chandler gave his brother these keys around 2:00 PM.

On July 8, 2021, Det. Shunk and Det. Hendrickson interviewed Chandler at the Public Safety Building. The following is an excerpt of the interview explaining how Chandler obtained his injury on his foot:

Det. Shunk: "Spoke to you. Okay. Umm, so, you you reported your parents missing. We got some information from you yesterday. Uh, we've been following leads last night, um, working today to, you know, go through different things umm just trying to locate 'em, right? Um, so, I, I guess if you wanna start with let's just go back to, to last Wednesday, uh"

Chandler: "Wednesday, I was with my dad (Bart). We, what time Wednesday? I remember it. It was kind of a bad day"

Det. Shunk: "Okay. Why was it a bad day?"

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Chandler: "Um, well, my ma (Krista) had work so she was gone, um, my dad (Bart) and I were watching something over lunch. It was um the Wheel of Fortune and we have, we're normally have the couch like with our back facing like the table we sat at at the end of you coming"

Det. Shunk: "Downstairs or upstairs"

Chandler: "downstairs"

Det. Shunk: "Okay"

Chandler: "You remember that room with the TV? I tossed the ball and I smashed the glass"

Det. Shunk: "Okay"

Chandler: "With the dog. The dog's help. Uh, that, yeah, set my dad (Bart) off and we tried to clean it up. I don't know about him, but I got injured, um, but he was mad. He didn't really talk to me too much that day. Uh, my mom (Krista) got home at five, I believe? I, that's her normal five twenty to five thirty"

Unsolicited Comments/Spontaneous Utterances

Det. Hendrickson reports towards the end of this interview at approximately 6:41 PM, Chandler invoked his rights to an attorney and the interview concluded. Chandler was advised he was under arrest at that point in time and was taken into custody.

As Det. Hendrickson and Chandler were walking towards booking, he made an unsolicited comment that he wanted to "go back up" and he would "tell me everything." Det. Hendrickson informed Chandler he could not speak with him any longer regarding his missing parents, as he had invoked his right to an attorney only minutes earlier.

Chandler then asked something to the extent of "What if I want to tell you everything with an attorney there to guide me?" Det. Hendrickson informed Chandler that would be entirely his decision to make at a later time but at this point, he was not going to be questioning him any further about his missing parents, as, again, he had invoked his right to an attorney.

Chandler then proceeded to make another unsolicited comment that he again, "wanted to tell me everything."

During the course of completing the booking paperwork, specifically the booking sheet and the medical intake questionnaire, Chandler had asked something to the effect of "what was different" in comparison to when he was interviewed yesterday compared to this date.

Det. Hendrickson's response to Chandler at that point in time was they had "found something," and Chandler had become very wide eyed similar to his reaction when prior to invoking his right to an attorney and made a comment to the extent of "You don't know the whole story."

During the course of completing the booking questionnaire, Det. Hendrickson asked Chandler if he was suicidal and his response to Det. Hendrickson's question was that he "didn't feel bad about what I did."

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Deputy Plenty had a search warrant for Chandler for collecting a DNA sample and also for a search of his person along with photo documentation. Deputy Plenty reports his observations of Chandler, while he was taking pictures, was that he had bruising on the back side of one of his upper arms. The coloration appeared to be purple and yellow.

Deputy Plenty observed there was bruising to the lower portions of Chandler's legs and his knee areas. Deputy Plenty observed in both left and right lower legs there was scratches present. These scratches appeared narrow in width. The scratches looked consistent to as if someone would have walked through berry or briar bushes. The field where the torso was found inside the woods has a significant amount of berry/briar bushes.

Additional Statements by CMM

On July 8, 2021, Det. Allen interviewed CMM again. CMM noted on July 2, 2021, she went to her mom's (DM's) to grab hydrogen peroxide and a Swiffer because Chandler broke the glass on the fireplace and needed to clean it up. She said Chandler cut his foot on the glass, which is why he needed the peroxide.

Det. Allen asked CMM if she saw the fireplace and she stated she did. When asked what it looked like, she said broken. She said she thinks there was one glass pane which was broken on the left side of the fireplace. When asked if she saw blood or glass, she stated it was all picked up. She said there was a little bit of glass on the floor. She said she didn't see a lot of blood because it was only a cut on his big toe. When asked if the blood was by the fireplace, she said she thinks so, but she didn't see it.

During the interview, Det. Allen asked DMM about the house renovations. Det. Allen said "obviously there's a lot of house renovations going on right now." Det. Allen wanted to know what the house smelled like. CMM said "dogs." She said when they were working on the basement walls, you could smell like the dusty dog smell.

Det. Allen asked CMM if Chandler ever talked about firearms that he had. She said his friend gifted him one. When asked when that was, she said when he visited from Kansas. She said other than that, his parents have a safe with guns. CMM reported that Chandler used to be on the shooting team in college.

When asked what the gun looked like, she held up both hand as if she was holding a shotgun and described it as long and black. She said it looked like an Army gun. She said they only have shotguns out at the farm and it is not a shotgun.

Ring Doorbell Video

Det. Mayerhofer reports on July 8, 2021, he received three emails from an individual whose name forms the initials KB. Det. Mayerhofer had previously been to KB's residence (on Oak Springs Circle), along with Det. Blanke, regarding Ring doorbell video.

Det. Mayerhofer received the three emails on July 8, 2021 with email one titled "1 of 3 See my new Ring video." Email two titled "2 of 3 See my new Ring video," and email three titled "3 of 3 See my Ring video." The following is a summary to the conversation captured on the ring video.

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Det. Mayerhofer opened the Ring videos and observed an individual identifying himself as Chandler Halderson ringing the doorbell at the identified address on Oak Springs Circle on July 8, 2021. Det. Mayerhofer sent an email to KB asking clarification as to what time this occurred, and she replied at 2:49 PM

In three videos, after Chandler identified himself to KB's sister (whose name forms the initials JL), Det. Mayerhofer heard Chandler ask if the video was able to "capture the road or my house?" He is told the police have already been to the house and downloaded all of the video. Chandler asks "did they captured anything on?" JL begins to answer then Chandler begins to inspect the camera system and JL is seen walking to the driveway portion with Chandler.

AJS's Statement

On July 9, 2021, Det. Mayerhofer made contact with a friend of Chandler, whose name forms the initials AJS. AJS reported he came to visit Chandler from Kansas, for the first time on June 12, 2021 and left on June 13, 2021.

AJS told Det. Mayerhofer that he left an SKS Norinco rifle with Chandler. Det. Mayerhofer asked what this rifle looked like. AJS described it as being black in color, custom built with an 18 to 20 inch barrel and they did not tell Bart and Krista about the firearm.

Det. Mayerhofer asked AJS if Chandler had ammunition for the firearm. AJS said yes, that he left Chandler with 480 rounds of steel case 7.62 X 39 ammunition.

AJS also told Det. Mayerhofer he was told by Chandler that Chandler somehow acquired 20 rounds of armor piercing ammunition; however, he did not know Chandler acquired the armor piercing ammunition. Det. Mayerhofer later received a message from AJS on July 7, 2021 advising Det. Mayerhofer he sent Chandler a link to where he can buy 7.62 X 39 ammunition.

Det. Mayerhofer asked AJS if Chandler had magazines for the firearm. AJS said he gave two magazines to Chandler and watched Chandler load the magazines. AJS said the magazines were 20 round magazines.

Your complainant is aware on July 13, 2021, during a search of 4595 Oak Springs Circle a 7.62x39 casing was located. This is consistent with what would have been fired from a SKS rifle.

Autopsy of Located Torso

Det. Allen reports on July 10, 2021, she attended the autopsy of an unidentified human remains which was found in the wooded area in the in the 3500 block of Earlwyn Rd.

Det. Allen reports Dr. Cori Ann Breslauer was able to positively identify the male torso as Bart Halderson based on antemortem images with postmortem images.

The autopsy began at 9:38 AM by Dr. Breslauer. Det. Allen noticed the deceased was covered in maggots and there was skin discoloration.

Dr. Breslauer saw what appeared to be an exit wound under his right ribcage.

Inside of the black body bag was a black rope which appeared to be a nylon fabric.

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There is one wound which enters through the abdominal cavity, hits the spinal cord, and fragments widely. Dr. Breslauer stated there is in fact a firearm injury to the abdomen and back, as well as neck area.

There are hemorrhaging of the tissue on the back which indicate that Bart was alive when struck by gunfire. The hemorrhaging is not consistent with suicidal patterns.

Dr. Breslauer informed Deputy Schneider that the fragments found were that of a high velocity projectile from a rifle. Dr. Breslauer indicated the damage and injury caused by this to the spine would certainly have been fatal.

Dr. Breslauer, completed the examination and ruled the cause of death as homicidal violence which to include firearm injury. The manner was ruled as a homicide.

Wisconsin River Canvass

Your complainant is aware a location photo of the defendant was determined to be near DNR land near Old Hwy 60 along the Wisconsin River near the Town of Roxbury, Dane County, Wisconsin.

On July 10, 2021, Det. Mayerhofer spoke with an individual, whose name forms the initials JD. JD reported the following: On July 3, 2021 in the morning, she observed a young man 20 to 30 years old walking away from a car walking up the street (Old Hwy 60) towards the highway (Hwy 188) by her daughter's home. This individual was wearing a backpack and walking away from the river.

JD describes him as a white male approximately 5'10," slender build being 170 to 180 lbs. He had on a black jacket, a black backpack and was maybe wearing a baseball style hat.

JD said his vehicle was parked by the woods and she thought it was odd he was walking away from his vehicle towards the highway, as she knows people hike the trails in the area; however, as he approached the highway he turned around and started walking back towards his car.

Your complainant is aware on July 14, 2021, a portion of unidentified human remains were located in the area of the aforementioned DNR property, where a person matching Chandler's description was seen.

ZDR's Statement

On July 11, 2021, Det. Hendrickson spoke with an individual, whose name forms the initials ZDR who had been in contact with Chandler.

ZDR reported he was aware a Bart had applied "for the installation of a mini split." On July 7, 2021, he responded to the Halderson residence (4595 Oak Springs Circle) for the appointment. Upon approaching the front door, he could hear the sounds of dogs barking inside, at which time he either knocked on the door or rang the doorbell. He attempted to make contact with a resident and stated there was no answer to his ringing and/or knocking.

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ZDR advised he was not too alarmed or concerned at that point in time simply because he was approximately 15 to 20 minutes early for the appointment, at which time he returned to his car and simply waited in the driveway. Approximately five to ten minutes later, an older Subaru arrived and parked beside him in the driveway. He noted the driver of the Subaru was Chandler and he made this identification after seeing images of Chandler in recent media reports regarding the disappearance of his parents.

ZDR advised when Chandler pulled in beside him, Chandler proceeded to wave at him, at which time he got out of the car and made contact with Chandler in the driveway of the home.

ZDR explained once he was in contact with Chandler, he explained he was there to provide a quote in regards to an air conditioning unit, specifically a forced air unit or mini split at which time Chandler informed him he didn't know anything about it.

ZDR stated he had told Chandler apparently his parents, more specifically Bart, had made this appointment for a quote. ZDR stated he offered to come back at a later time and "reschedule." ZDR stated Chandler's response to this was that it had to be taken care of sooner or later at which time the two of them began walking towards the residence.

ZDR advised it was his initial belief that Chandler was going to allow him access to the home to perform the activities he needed to do to provide an accurate quote, but upon approaching the door prior to entry, the dogs began barking again. ZDR advised once they approached the door and the dogs began barking, Chandler said something to the extent of "oh the dogs" which was followed by a very long and somewhat puzzling pause according to ZDR. ZDR advised the pause on the part of Chandler was so long it prompted him to state again "perhaps we should just reschedule" which at this point in time Chandler was agreeable to.

ZDR reported there were sets of windows to the left and right of the front door and at approximately three feet to the left of the front door, he noted a vent which he believed to be either a dryer vent or possibly a ceiling vent which would be used to push air from the residence. ZDR stated what was so concerning about this was that there was some sort of barrier, which he believed was tape, essentially covering the vent. ZDR advised if this was connected to a gas dryer is the equivalent of parking your car in the garage and turning it on, indicating one could get CO2 poisoning from this type of behavior.

ZDR also stated if the vent was connected to an electric dryer, it was probably of no consequence, but he just thought it was very odd that a vent coming from the residence would have tape over it. ZDR stated this was even more concerning as a result of local media reports he had seen involving Chandler Halderson.

Medical Expert

Your complainant believes the information from Dane County Medical Examiners/Doctor Cori Ann Breslauer to be truthful and reliable as the information was gathered during their employment as medical examiners investigating a crime scene and later examination of human remains.

****THIS COMPLAINT IS BASED ON** the information and belief of your complainant, who is a Court Officer for the Dane County Sheriff's Department, and who learned of the above offense from the reports of Dane County Sheriff's Deputy(ies) John Nelson Joshua Seeley, Hayley

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Collins-LaFevre, Greg Leatherberry, Daniel Feeney, James Plenty, Erik Schneider and Detective(s) Sabrina Sims, Brian Shunk, William Hendrickson, Elizabeth Allen, Leslie Keith, Brent Baverstock, George Mayerhofer, and Timothy Blanke, which report(s) your complainant believes to be truthful and reliable inasmuch as they were prepared during the course of the Deputy(ies) official duties.

Further, your complainant believes the information furnished by witness(es) to be truthful and reliable inasmuch as they are citizen informant(s) and witnessed the events described.

Your complainant believes the statements of the Defendant(s) to be truthful and reliable insofar as they are admissions against penal interest.

Subscribed and sworn to before me on
07/15/21

Electronically Signed By:

Dallas B. Montano

Assistant District Attorney

State Bar #: 1112901

Electronically Signed By:

Dawn Leatherberry

Complainant