

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

STATE OF WISCONSIN

Plaintiff,

vs.

PAUL D VAN DUYNE

122 N Spooner St
Madison, WI 53726

DOB: 10/01/1981

Sex/Race: M/W

Eye Color: Hazel

Hair Color: Brown

Height: 5 ft 09 in

Weight: 155 lbs

Alias:

Ref. Agency: Middleton Police
Department

WI Dept of Justice - Division of Criminal
Investigation

DA Case No.: 2025DA005325

Assigned DA/ADA:

Agency Case No.: MIPD 25-7089

MIPD 25-7318

WIDJ 25-4648

Court Case No.: 25CF_____

ATN: 13026501035034

For Official Use

ANDREA L WHITAKER

5604 Schroeder Rd Apt 102
Madison, WI 53711

DOB: 11/21/1983

Sex/Race: F/W

Eye Color: Brown

Hair Color: Brown

Height: 5 ft 04 in

Weight: 125 lbs

Alias:

Court Case No.: 25CF_____

ATN: 13286501035299

CRIMINAL COMPLAINT

Defendants,

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

Count 1: ATTEMPT FIRST DEGREE INTENTIONAL HOMICIDE (As to defendant Paul D Van Duyne)

The above-named defendant on or about Thursday, May 15, 2025, in the City of Middleton, Dane County, Wisconsin, attempted to cause the death of DANE VICTIM, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.32 Wis. Stats., a Class B Felony, and upon conviction may be sentenced to a term of imprisonment not to exceed sixty (60) years.

Count 2: ATTEMPT FIRST DEGREE INTENTIONAL HOMICIDE - AS A PARTY TO A CRIME (As to defendant Andrea L Whitaker)

The above-named defendant on or about Thursday, May 15, 2025, in the City of Middleton, Dane County, Wisconsin, as a party to a crime, attempted to cause the death of DANE VICTIM, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.32, 939.05 Wis. Stats., a Class B Felony, and upon conviction may be sentenced to a term of imprisonment not to exceed sixty (60) years.

Count 3: ATTEMPT FIRST DEGREE INTENTIONAL HOMICIDE (As to defendant Paul D Van Duyne)

The above-named defendant on or about Tuesday, May 20, 2025, in the City of Middleton, Dane County, Wisconsin, attempted to cause the death of DANE VICTIM, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.32 Wis. Stats., a Class B Felony, and upon conviction may be sentenced to a term of imprisonment not to exceed sixty (60) years.

Count 4: ATTEMPT FIRST DEGREE INTENTIONAL HOMICIDE - AS A PARTY TO A CRIME (As to defendant Andrea L Whitaker)

The above-named defendant on or about Tuesday, May 20, 2025, in the City of Middleton, Dane County, Wisconsin, as a party to a crime, attempted to cause the death of DANE VICTIM, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.32, 939.05 Wis. Stats., a Class B Felony, and upon conviction may be sentenced to a term of imprisonment not to exceed sixty (60) years.

Count 5: STALKING (As to defendant Paul D Van Duyne)

The above-named defendant on or about Tuesday, May 20, 2025, in the City of Middleton, Dane County, Wisconsin, did intentionally engage in a course of conduct directed at a specific person to wit: DANE VICTIM that caused that person and that would cause a reasonable person under the same circumstances to suffer serious emotional distress or to fear bodily injury or death to themselves or to a member of their family or household and where the defendant knew or should have known that at least one of the acts that constituted the course of conduct caused DANE VICTIM to suffer serious emotional distress or placed DANE VICTIM in reasonable fear of bodily injury or death to themselves or a member of their family or household and where the defendant's acts caused DANE VICTIM to suffer serious emotional distress or induced fear in DANE VICTIM of bodily injury or death to themselves or a member of their family or household, contrary to sec. 940.32(2), 939.50(3)(i) Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

Count 6: HARBORING OR AIDING A FELON (As to defendant Andrea L Whitaker)

The above-named defendant on or about Monday, June 16, 2025, in the City of Madison, Dane County, Wisconsin, with intent to prevent the apprehension of a felon, did aid that person, and the offense committed by the felon being aided is a Class B felony, contrary to sec. 946.47(1)(a) and (2m)(a), 939.50(3)(g) Wis. Stats., a Class G Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

FACTS:

Your complainant is a Court Officer with the Fitchburg Police Department and for this complaint is relying on the written police report(s) submitted by Middleton Officer(s) David Schultz, Gerald Kapinos, Detective Jill Tutaj, Detective Lieutenant Darrin Zimmerman, Janesville Police Officer Nicholas Cervantes and Rock County Sheriff's Office Deputy Jacobs,

Michalski, Deputy Simonson, Deputy Lamendola and Detectives Ross Wenger and Beau Douglas.

Background Information

On May 12, 2025, the Rock County Sheriff's Office was dispatched to St. Mary's Hospital in Rock County, Wisconsin to investigate a possible poisoning. Over the course of the next five weeks, the DOJ Department of Criminal Investigations, the Federal Bureau of Investigation, the Rock County Sheriff's Office, the Middleton Police Department, and the Madison Police Department collaborated on an investigation. This investigation revealed that two codefendants in a relationship – **PAUL VANDUYNE JR.** (a defendant “VanDuyne” hereinafter, verbally identified) and **ANDREA WHITAKER** (a defendant, “Whitaker” hereinafter, verbally) conspired to gather or create elaborate poisons, and use them to attempt to murder two different young women with whom VanDuyne had previously been involved. The co-defendants’ crimes that are presently known include:

- The poisoning of [ROCK VICTIM] on or about April 26, 2025, by breaking into her car in the Town of Fulton, Rock County, Wisconsin, and filling her gym water bottle with Cyanide and Thallium.
- The attempted poisoning of [ROCK VICTIM] and her minor sister on May 4, 2025, by breaking into her car in the Town of Fulton, Rock County, Wisconsin, and placing a plastic tote in the cargo area, believed containing Hydrogen Sulfide.
- The attempted poisoning of [ROCK VICTIM] on or around May 7, 2025, by breaking into her car in the Town of Fulton, Rock County, Wisconsin and placing homemade Abrin in the ventilation of her vehicle.
- The attempted poisoning of [DANE VICTIM] on May 15, 2025, by breaking into her car in the City of Middleton, Dane County, Wisconsin, and filling her water bottle with a substance believed to be Cyanide and Thallium.
- The attempted poisoning of [DANE VICTIM] on May 20, 2025, by breaking into her car in the City of Middleton, Dane County, Wisconsin, and filling her water bottle with a substance believed to be Cyanide and Thallium.
- The stalking of [ROCK VICTIM] over the course of months to try to accomplish her murder.
- The stalking of [DANE VICTIM] over the course of months to try to accomplish her murder.

On June 15, 2025, while law enforcement was investigating, officers observed VanDuyne travel from Madison to [ROCK VICTIM]'s home. VanDuyne had placed a trail camera, pointed at her house to surveil her. VanDuyne was arrested and taken into custody.

The day after VanDuyne was arrested, law enforcement observed Whitaker enter VanDuyne's home located at 1401 W Skyline Dr., City of Madison, Dane County, Wisconsin and leave with a laptop and a garbage bag full of evidence. She was also placed under arrest.

The investigation of VanDuyne and Whitaker remains ongoing. The following summarizes the evidence law enforcement has gathered to date.

THE ROCK COUNTY VICTIM

On May 12, 2025, Dr. Tuttle from the Wisconsin Poison Center called Rock County law enforcement to report a patient at St. Mary's Hospital, identified as [ROCK VICTIM], had been poisoned. [ROCK VICTIM] had experienced severe abdominal pain during the day on May 6, 2025 and into the early morning hours of May 7, 2025 and was eventually hospitalized. She first spoke with Officer Cervantes of the Janesville Police Department. Dr. Tuttle told Officer Cervantes that [ROCK VICTIM] had a large amount of Thallium in her system. Dr. Tuttle elaborated that Thallium is an odorless, tasteless, sand-like substance. It was once used in rat poison, but Dr. Tuttle indicated it has been "outlawed" in the United States for decades, because it is so toxic. According to Dr. Tuttle, "the only way a human could have this amount of Thallium in her system is if they were intentionally consuming it."

Dr. Tuttle told Officer Cervantes she had managed to contact a lab in California who had an antidote for Thallium poisoning, and it would be sent overnight to St. Mary's Hospital, to give to [ROCK VICTIM] the next morning.

Officer Cervantes spoke with K.M., who is [ROCK VICTIM]'s stepfather. K.M. indicated he found a brown, sandy substance inside [ROCK VICTIM]'s vehicle. It was in the vehicle on May 8, 2025, but it was not in the vehicle the day before. He vacuumed her car, but he kept a small sample of the suspicious substance to give to law enforcement for testing.

Officer Cervantes took an initial statement from [ROCK VICTIM], who reported multiple suspicious events within the last month. Since some of those instances took place outside of Janesville, the investigation was turned over to the Rock County Sheriff. Deputy Jacobs of the Rock County Sheriff's Office arrived at the hospital and was briefed by Officer Cervantes, including about the substance K.M. had found.

Deputy Jacobs spoke with A.M., who is [ROCK VICTIM]'s mother. A.M. said there were three total suspicious incidents: a bottle of water, a sulfur smell in the vehicle, and a sand-like substance in the driver's side air vent to the left of the steering wheel in [ROCK VICTIM]'s car. A.M. reported about a month ago, [ROCK VICTIM] drank from her water bottle and found it had a "foul" taste, and she "threw up a bunch of times." A week ago, [ROCK VICTIM] had driven with her minor sister, to Janesville, and by the time they arrived at the movie theater the smell was "overwhelming." They left the vehicle and got a ride home; shortly thereafter, [ROCK VICTIM]'s minor sister got sick and had to come home from school. A.M. also indicated she picked up the car on May 7, 2025. A.M. did not report noticing anything unusual in the air vents. Now, [ROCK VICTIM] was in the hospital for intentional poisoning.

Deputy Jacobs spoke with nursing staff, who indicated [ROCK VICTIM] had been given morphine to manage her pain, so she may be a bit "loopy." [ROCK VICTIM] told the Deputy of the same incidents A.M. had said, and added she had been receiving alarms when she entered her vehicle at home, indicating a theft had been attempted on the vehicle. The Rock County Sheriff's Office appointed Detectives to investigate.

On May 15, 2025, Detectives Wenger and Douglas interviewed [ROCK VICTIM] in the hospital. She said she has her own vehicle and generally no one drives it but her. She told the

Detectives that for about a month, she has been getting "theft attempted" alerts when she got into her vehicle. They were happening so often, she assumed it was a mechanical issue. She described them as occurring "almost every time she got into her car at her house."

[ROCK VICTIM] indicated she went to the gym on the evening of Friday, April 25, 2025. Detective Wenger reports he checked the history at the gym and confirmed [ROCK VICTIM] checked into the gym at 6:47pm on that date. [ROCK VICTIM] drank from the metal water bottle that "lives" in her vehicle/gym bag, and everything was fine. She then drove straight home and parked the vehicle on the street, near her home in the Town of Fulton, County of Rock, State of Wisconsin. [ROCK VICTIM] said she always parks in the same spot. The next morning, she went to the gym again. Detective Wenger confirmed her check-in time as 11:43am on April 26, 2025. [ROCK VICTIM] took "a couple gulps" from her water bottle, and it tasted "rancid." She got sick, gagged, and threw up. As she washed her mouth out, she joked that she was poisoned.

[ROCK VICTIM] confirmed the last time she filled up the water was at the gym on April 25, 2025 that she had it with her the entire time she was at the gym on April 26, 2025 and nobody tampered with it during that time. She went home and started to feel better a few hours after throwing up. She told the Detectives the water in the water bottle was still in her car, untouched.

[ROCK VICTIM] told the Detectives she drove to Chicago shortly thereafter and found another water bottle in her car. This bottle was clear plastic, about 16 oz., and she had no idea where it came from. It was not from the gym, and it was not hers, but she thought perhaps it was left over from some passenger, like her sister. She opened it and smelled it, and found it had the same rancid odor as the water in her gym bag bottle. She threw the clear plastic bottle away.

On May 16, 2025, Detective Wenger and Deputy Michalski performed a search on [ROCK VICTIM]'s vehicle, which was held at the Sheriff's lot. The water bottle's contents were tested at the Wisconsin Hygiene laboratory. The preliminary results from the evaluation showed a detection for the presence of three chemicals at toxic levels:

- Cyanide (HCN), triplicate estimated at 890ppm, 681ppm, and 730ppm
- Thallium at 182.6 ug/L
- Iron at .8515 mg/L, a concentration considered dangerous to life or health.

On May 4, 2025, [ROCK VICTIM] had taken her sister to the movies. While in [ROCK VICTIM'S] vehicle, they noticed a smell which was so overpowering they had gotten a ride home rather than driving the car. They then had the car taken to the Kayser dealership to determine the issue.

Detectives Wenger and Douglas traveled to the Kayser dealership and met with multiple employees who serviced [ROCK VICTIM]'s vehicle. They confirmed the incident, and reported identifying the smell as being so strong, the technician driving the vehicle had to stick his head out of the open window to pull the vehicle around for evaluation. They identified the source being an older plastic storage tote found near the rear cargo area of the vehicle. The tote had an unknown substance inside of it, and did not appear as if it belonged with the rest of the contents of the vehicle. They removed the tote and put it in the dumpster, though the dumpster had been emptied by the time the Detectives got there to investigate.

[ROCK VICTIM] confirmed the insane rotten egg smell in her car, and she did not put a tote there.

The Detectives also spoke with K.M.2 , [ROCK VICTIM]'s sister, a middle-schooler. The sister confirmed the sulfur, "rotten egg" smell on the ride to Janesville. After this K.M.2 had gotten sick and had to come home from school.

Based on further investigation including the eventual search of VanDuyne's residences, Detectives suspect the tote contained hydrogen sulfide (H₂S), a toxic and corrosive gas. It can be fatal at high doses, and it is known for generating a "rotten egg" or sulfur odor.

[ROCK VICTIM's] car was picked up from the Kayser dealership on May 7, 2025 and there was reportedly nothing unusual in the air vents. K.M.1 described finding a brown, sandy substance inside [ROCK VICTIM]'s vehicle on May 8, 2025. He believed it might be poison. He vacuumed it out of her car, but he kept a small sample of the substance to give to law enforcement for testing.

On June 13, 2025, the Wisconsin Laboratory of Hygiene returned preliminary results of the test of the substance K.M.1 found in [ROCK VICTIM'S] vehicle vents and collected for law enforcement. These preliminary results were "definitive detection for the presence of abrin," a marker for Abrin.

A review of the Center for Disease Control's *Emergency Response Safety and Health Database* shows that Abrin is "an extremely toxic plant protein," and "exposure to even a small amount of Abrin may be fatal." It describes how Abrin can be released into indoor air as fine particles. Abrin is similar to Ricin and can be derived from the seeds of *Abrus precatorius* – the rosary pea.

[ROCK VICTIM] denied doing any harm to herself. She struggled to name any possible suspects who might want to poison her.

On June 9, 2025, [ROCK VICTIM] contacted Detective Wenger and said while she has been hospitalized, she was reviewing text messages and thinking. She wanted to inform the Detectives of a possible suspect: Paul, whose last name she could not recall, who lived on Spooner Street in Madison, Wisconsin. She provided a phone number, which Detective Wenger was able to use to identify a male named Paul VanDuyne Jr., whose address was 122 N. Spooner Street in Madison, Wisconsin.

[ROCK VICTIM] told the Detectives she met VanDuyne about two years ago on a dating app. VanDuyne was older and getting divorced. The two of them had a relationship she described as "casual" and "sexual," with positive but non-romantic feelings.

While she was seeing VanDuyne, VanDuyne met a woman online named "Ani." Ani was subsequently identified as the codefendant, Andrea Whitaker. VanDuyne discussed Whitaker with [ROCK VICTIM], and [ROCK VICTIM] warned VanDuyne that Whitaker seemed dangerous and toxic. She described VanDuyne as passionate about Whitaker, and he thought Whitaker was "the one." VanDuyne told [ROCK VICTIM] that Whitaker was finishing pharmacy

school and would be moving to Madison soon. Once VanDuyne finally met Whitaker in person, he cut off contact with [ROCK VICTIM].

In early 2025, after having months of no contact with VanDuyne, [ROCK VICTIM] suddenly received several text messages in early 2025 from VanDuyne. The messages accused [ROCK VICTIM] of being evil and saying that Whitaker “had killed herself” because she learned about VanDuyne having a relationship with [ROCK VICTIM]. He continued that he would never forgive [ROCK VICTIM], and she should “rot in hell.”

Detectives Wenger and Douglas researched Paul VanDuyne and found he had very recently been arrested by the Middleton Police Department for breaking into a locked vehicle. Detective Wenger contacted Middleton Police and found that [ROCK VICTIM] was not the only one whose car was broken into in an attempt to poison her.

DANE VICTIM

First Incident

On May 15, 2025, a Good Samaritan, A.R. in the Costco parking lot called 911, to report a vehicle break-in. Officer Schultz of the Middleton Police Department was dispatched to the Costco parking lot at 2150 Deming Way in the City of Middleton, Dane County, Wisconsin.

A.R. spoke to Officer Schultz and said they observed a white male approach a vehicle later identified as belonging to [DANE VICTIM]. The window of the vehicle was slightly open, and A.R. observed the white male put something down the window to get the door unlocked. A.R. reported the lights started going off in the vehicle, as the male rummaged around the car. After a short time, he got out and closed the door. He then ran back to a Chrysler Pacifica bearing the license plate AFF5493 and left the parking lot. The Pacifica is registered to Paul VanDuyne.

Officer Schultz spoke with [DANE VICTIM], who reported she did not notice anything stolen from her vehicle. Shortly thereafter, [DANE VICTIM] reapproached Officer Schultz to report she had just taken a sip from her water bottle, which was in her car when it was broken into. She told the Officer Schultz the water “tasted awful” and her mouth “felt funny.”

Second Incident

On May 20, 2025, Officer Kapinos was dispatched to the same Costco parking lot, at 2150 Deming Way in the City of Middleton, Dane County, Wisconsin. [DANE VICTIM] called to report someone trying to break into her vehicle again. [DANE VICTIM] said she had been shopping, and when she came out afterward, the woman who parked next to her told her a man tried to break into the passenger side of her vehicle.

Officer Kapinos contacted T.S., in the Costco parking lot. T.S. said she observed a white male, about 5'10" and medium build, attempt to enter [DANE VICTIM]'s car in the Costco parking lot. She observed him wedge something like a blood pressure cuff into the front passenger door of the vehicle. He had the corner of the door open about an inch, and started using a long metal rod to reach into the vehicle. He noticed T.S. staring at him, and told T.S. he “wasn't breaking in,” that it was his car and he locked his keys inside. T.S. recommended he call an expert to help. He agreed, removed the cuff and rod, and walked away. When T.S. observed [DANE VICTIM] get into her own vehicle, she made sure to inform her of what she had seen.

On May 21, 2025, Middleton detectives reached out to [DANE VICTIM], who confirmed she knew Paul VanDuyne. They had gone on a few dates, over a year ago. She said she ended the relationship because she found she was not interested in him. She had not heard from him lately, and confirmed she never told him where she lived.

She brought her car into the Middleton Police Department for inspection. Officer Kapinos reports that suspected toolmarks were found on the passenger side B-Pillar, front passenger door, and weather stripping. These tool marks are consistent with a procedure to enter a locked vehicle. [DANE VICTIM] indicated she has never been locked out of her vehicle and never asked anyone to assist her in entering her vehicle, to create these tool marks.

[DANE VICTIM] also relayed that the water she drank on May 15 was still in the vehicle. She said she tasted it, but it tasted “weird” so she spit it out. She had her boyfriend taste the water to see if he agreed; he also spit it out. Both of their mouths became numb. She purposefully kept the water in the bottle, because she was contemplating having it tested. Middleton Police collected the water bottle as evidence and sent it to be tested.

While [DANE VICTIM] was speaking with Officer Kapinos, she said the only other incident that was out of the ordinary was a “strange woman who appeared in her garage.” On April 21, 2025, between 6:45 and 7:00pm, [DANE VICTIM]’s boyfriend arrived at her home in the City of Madison, Dane County, Wisconsin. He observed a woman entering [DANE VICTIM]’s garage, where her car was parked. [DANE VICTIM] went into the garage and said something to the strange woman. The woman immediately left the garage. [DANE VICTIM] and her boyfriend followed the woman to confront her, but the intruder claimed she was never in the garage. [DANE VICTIM] described the woman as 5’6” or 5’7”, approximately 140 lbs., with shorter brown hair under a cap. Neither [DANE VICTIM] nor her boyfriend had seen her before or since.

[DANE VICTIM] WATER BOTTLE TESTING RESULTS

On June 12, 2025, Detective Tutaj received an email from Analyst Meshel Lange from the Wisconsin Hygiene Lab. In the email Analyst Lange indicated the water samples taken from [DANE VICTIM]’s water bottle were evaluated in the WSLH Inorganic Chemistry Department for thallium on an EPA accredited drinking water assay via Inductively Coupled Plasma Optical Emission Spectrometry (ICP-OES).

Thallium was present in [DANE VICTIM]’s water bottle samples but at concentrations that did not exceed the lower reportable limit of detection for the assay, which is 12 ug/L (micrograms/liter or ppb). The low levels detected are considered to be background levels. Cyanide was also detected and the result appears to be high.

Detective Lieutenant Zimmerman reviewed reference material produced by the United States Environmental Protection Agency (EPA) regarding cyanide. Cyanide is extremely toxic to humans. Chronic (long-term) inhalation exposure of humans to cyanide results primarily in effects on the central nervous system (CNS). Other effects in humans include cardiovascular and respiratory effects, an enlarged thyroid gland, and irritation to the eyes and skin.

The EPA notes cyanide is extremely toxic to humans. Acute (short-term) inhalation exposure to 100 milligrams per cubic meter (mg/m) or more of hydrogen cyanide will cause death in

humans. They also note chronic exposure to cyanide in humans via inhalation results in effects on the CNS, such as headaches, dizziness, numbness, tremor, and loss of visual acuity.

STATEMENTS OF PAUL VANDUYNE

On May 21, 2025, Officer Kapinos contacted Paul VanDuyne by telephone. VanDuyne said he could not come in for an interview at the moment, because he was working. He denied being at the Costco location on May 15 or May 20, 2025. He said he did not know of anyone else who would be driving his vehicle.

On May 22, 2025, VanDuyne showed up at the Middleton Police Department for an interview. When he pulled into the parking lot, he was driving a grey Chrysler Pacifica bearing the license plate BAM9693. According to DOT records, this plate was registered to the same vehicle as the license plate AFF5493. VanDuyne said his license plate had been stolen. He claimed it was stolen on May 14, 2025. He further claimed he had never reported it stolen, but he got new plates yesterday after being contacted by Middleton Police.

VanDuyne told the Officer Kapinos he knew [DANE VICTIM]. He was asked to provide fingerprints or DNA, to eliminate him as a suspect in breaking into her car, but he declined and ended the interview.

COLLABORATIVE INVESTIGATION AND ARRESTS

Now that the two agencies realized they were investigating the same person for the same type of crime, they began sharing information and working together, and with DCI and the FBI to assist in their collaborative investigation.

After learning of the method of vehicle entry in Middleton, Rock County Deputy Michalski examined [ROCK VICTIM]'s vehicle, which was still located in the Sheriff's impound lot. Deputy Michalski reports the front passenger door would not close flush. The door was locked and secure, but the upper corner of the door (in the area of the B-pillar) was pulled slightly away from the door frame. Deputy Michalski reports this gap was notable, and unique compared to the other doors. He also observed a faint scuff mark on the front edge of the rear passenger door trim, adjacent to the gap in the front passenger door, and consistent with tool entry to [ROCK VICTIM]'s vehicle.

Detective Wenger searched VanDuyne's AFF5493 license plate in the Automatic License Plate Reader system. The system does not keep automatically read plates for very long, but it still located that plate clearly visible in Rock County. On May 19, 2025, a grey Chrysler Pacifica bearing AFF5493 was seen near the intersection of Highway 51 and County Highway M, approximately one mile away from [ROCK VICTIM]'s home.

THE FIRST ARREST

Officers secured a warrant to place a GPS device on VanDuyne's Pacifica. On June 15, 2025, law enforcement located VanDuyne's vehicle in transit, driving in Dane County. They followed it onto the Beltline, onto Interstate 39/90 southbound, and observed it exit on Highway 51. The Pacifica continued to travel until it pulled into the small subdivision in the Town of Fulton where [ROCK VICTIM]'s home is located. VanDuyne then parked the vehicle a short distance away from the home and left on foot.

The Rock County Sheriff's Office sent extra patrol to the area around 10:30pm, including having a Deputy stop by [ROCK VICTIM]'s home to knock on the door and check on their welfare. Shortly thereafter, DCI Special Agents observed a white male subject running towards the Pacifica. They arrested him and he was identified as Paul VanDuyne. VanDuyne was wearing a black hooded sweatshirt and had on his person a KN95 mask and two latex surgical gloves.

Once the sun rose, Rock County Sheriff's Deputies searched the area around [ROCK VICTIM]'s home. Deputy Simonson located a trail camera hung on a tree, pointed directly at [ROCK VICTIM]'s home. This tree was on land marked "private property," and belonged to a neighbor. Deputy Simonson contacted the neighbor and confirmed that no one had placed a trail camera on that tree.

Deputy Michalski describes the camera as clean and free of any damage or scratches and believes it to be relatively new. Deputy Michalski reports the strap still had visible creases on it, as if it had been recently unpackaged and applied to the tree. Deputy Michalski reviewed the camera's contents. It only had eight images on it, the first of which was dated June 15, 2025 at 10:28pm. There were also short videos of a subject adjusting the angle of the camera to point it directly at [ROCK VICTIM]'s home. The subject is a male wearing a hooded sweatshirt and surgical gloves.

Deputy Lamendola reviewed security footage from a camera near [ROCK VICTIM]'s home, looking for instances of VanDuyne's Pacifica minivan driving past the camera. Deputy Lamendola reports finding it drive by her home in a remote subdivision at least three times, including: April 6, 2025 at 12:48am, May 17, 2025 at 1:38am, and May 19, 2025, at 10:58pm.

At this time, Middleton police had probable cause to arrest VanDuyne for stalking for [DANE VICTIM]. VanDuyne was handed over to Dane County authorities and booked in the Dane County Jail.

REMOVAL OF EVIDENCE AND THE SECOND UNPLANNED ARREST

On the morning of June 16, 2025 at 10:04am, VanDuyne placed a collect call from the Dane County Jail to Andrea ("Ani") Whitaker. All calls from the Dane County Jail are recorded. VanDuyne asks Whitaker to take care of his cats, and she informs him she already has. Later in the call, he asks her to do more:

VanDuyne: Ok. You can, um the way that, one way you could check of the um can you... so did you did you take care of the cats? You get their stuff in the laundry room too?

Whitaker: Yes

VanDuyne: Ok, um can you check, you can check Google home and that will have any alerts of movement at the door. And if no one's been there...um I have some cat medicine on the top shelf in the refrigerator that really should be disposed of

Whitaker: It's not good anymore?

VanDuyne: Yeah

Whitaker: Ok

VanDuyne: It needs to be dealt with right, there's immediate results (?) still to last night but I obviously didn't have a chance to

Whitaker: Cat medicine

VanDuyne: On the top shelf

Whitaker: Ok yeah cause I don't want to be confused and give them the wrong thing. Ok cat medicine in top of fridge

VanDuyne: Yup

Whitaker: Bad

VanDuyne: Yeah, and then can you take the garbage out too

Whitaker: Yeah

VanDuyne: I don't know how long I'll be here

Whitaker: Is there anything else in the fridge I should get rid of, like is it gonna get rotten or do you think its ok

VanDuyne: No, I just went shopping yesterday so everything should be ok. Now it's just that that I didn't get out, so if you can get that out and take the garbage out just so it doesn't get smelly

Whitaker: Ok and then the laundry room um the cat stuff in the laundry room is that like the stuff I've already seen I've already known about?

VanDuyne: yeah... yup

As law enforcement officers were writing search warrants for VanDuyne's houses, they observed Whitaker enter VanDuyne's Skyline Drive address. They saw Whitaker through the window moving about the home. VanDuyne called her collect again at 10:57am, while she was in the home. He asked her to take his laptop as well. Sometime around 11:30am, she exited the home with a laptop, a garbage bag, and a vial of cloudy liquid she identified as "cat medicine."

Whitaker was detained by law enforcement and placed under arrest for aiding a felon. All of the property she had with her was left on scene, and she was taken to the Dane County Jail for booking.

THE PRELIMINARY RESULTS OF MANY SEARCHES

After securing search warrants, law enforcement began searching VanDuyne's Spooner Street address, as well as his rental on Skyline Drive. In the home on Spooner Street, they found

rosary pea seeds, and a grinder with a single pea in it. On a workbench in the basement, several other loose rosary peas were found on a counter, along with a fine powder. Authorities determined this to be a biohazard and temporarily ceased searching in order to secure the area and perform hospitalized medical checks on the officers who had already been in the home.

As noted above, rosary pea seeds are the natural source of the derivative poison Abrin, which was preliminarily identified within the grainy substance found in [ROCK VICTIM]'s vehicle on May 8, 2025. The handwritten chemical formula was for Abrin found in a notebook in VanDuyne's Skyline Drive address.

Additionally, law enforcement found a generator for hydrogen sulfide (H₂S), a toxic and potentially fatal substance, known for generating a "rotten egg" or sulfur odor, similar to that in [ROCK VICTIM]'s car. Further search revealed a package of 50 seeds of Castor Bean *Zanibariensis*, which is used in the production of the poison Ricin.

WHITAKER PRELIMINARY PHONE EXTRACTION

An extraction was performed on Whitaker's phone, located on the premises of the Skyline Drive address. While a full extraction has not been submitted as of this writing, the preliminary findings demonstrate that Whitaker was not hiding evidence to conceal *his* crimes, but *their* crimes, as Whitaker's phone documented the following internet searches:

- 96 searches involving [ROCK VICTIM]'s name, including her employer, college, address, Facebook and LinkedIn accounts, etc.
- At least 2 searches involving [DANE VICTIM]'s name, including address
- 43 searches involving cyanide, including:
 - Potassium cyanide inhalation
 - Does potassium cyanide cloud water
 - Sodium cyanide odor
 - Potassium cyanide odor
 - Potassium cyanide lethal dose
 - How quickly is sodium cyanide lethal
 - Is sodium cyanide tasteless
 - Does potassium cyanide degrade in water
- 55 searches involving Thallium, including:
 - Is Thallium sulfate tasteless
 - Does Thallium nitrate have taste
 - Is Thallium nitrate soluble in water
 - What form of Thallium is most toxic
 - Thallium sulfate how long to kick in
 - Antidote for Thallium poisoning
- 27 web searches involving Abrin, including:
 - How much abrin is in a rosary pea
 - Is rosary pea powder the same as Abrin
 - Is abrin from inside rosary pea or shell
 - How long to soak rosary pea seed to extract Abrin
 - Abrin toxin poisoning
 - Abrin lethal dose

The phone also contained a message conversation between Whitaker and VanDuyne, which demonstrated that this conspiracy began months before, with both of their input. While the whole phone extraction remains pending, the following is an excerpt of messages from February 18-22, 2025:

VanDuyne: Thallium

Whitaker: Lethal dose of Thallium is 10-15 mg/kg

VanDuyne: [web link to online purchase of Thallium]

Whitaker: [photo entitled "solvent for thallium – google search.jpeg"]

VanDuyne: Thallium sulfate is a powder form that might work. Theoretically I can make it by mixing thallium with sulfuric acid. I'll need to do more research on out of turn a stick of Thallium into a form that she would inhale

Whitaker: Or figure out where you can order thallium sulfate, thallium acetate, or thallium carbonate. Those look to be the most toxic and most readily absorbed

VanDuyne: I can order a bunch of thallium acetate. Although I need to check if they ship to anyone or just to research labs

VanDuyne: Found it. Takes a couple of weeks for delivery. [web link to online purchase of Thallium sulfate]

VanDuyne: I am wondering if I am better off ordering the Thallium and making it. I'm not sure that I can order thallium sulfate without unwanted attention. I have my beakers, my hot plate with magnetic stirrer, and my sulfuric acid. The nitric acid comes Tuesday, and the Thallium should be here next week. The shipping label was created, but no tracking info yet. All I need is a couple of hours and I'll have all I need to get rid of Satan.

After Whitaker was arrested and booked in the Dane County jail, [DANE VICTIM] and her boyfriend, A.W.M., showed up at the Middleton Police Department. They said they had looked at Whitaker's booking photo on the Dane County Sheriff's website, and both immediately recognized her as the person who entered [DANE VICTIM]'s garage on April 19, 2025. Officer Tutaj asked A.W.M. and [DANE VICTIM] how sure they were that Andrea Whitaker was the person they found in [DANE VICTIM]'s garage, and they responded "100% sure."

On June 19, 2025 (the date of the filing of this complaint), Rock County Detectives and FBI Special Agent Bomb Technicians made entry into VanDuyne's van to determine whether explosives were present. While clearing the vehicle, agents located a tan tote bag on the front passenger seat. The inside edge of the tote bag is labelled "Van Duyne." Preliminary search of the bag revealed multiple items that were consistent with being chemical or biological hazardous materials.



According to Detective Douglas, the following items were located and preliminarily identified while awaiting the FBI Hazardous Materials Unit to clear VanDuyne's vehicle:

- Five sealed vials
 - Three containing a white substance
 - Two containing a brown substance
- One inhaler
 - Packed inside a black latex glove
 - The cartridge for which was superglued in place to prevent removal or backspray
- A water bottle consistent with the brand in [ROCK VICTIM]'s car full of liquid, but seal broken
- A bag of rosary peas
- An air pump bag similar to the "blood pressure cuff" that T.S. described being used to break into [DANE VICTIM]'s vehicle

DANE VICTIM'S STATEMENT

Officer Kapinos asked [DANE VICTIM] how she felt about someone entering her vehicle on May 15, 2025, and attempting to enter her vehicle on May 20, 2025 in the Costco parking lot. [DANE VICTIM] said she felt really scared. [DANE VICTIM] rated her level of being scared as 8 out of 10, 10 being the worst. [DANE VICTIM] said it was the scared of the unknown and really creepy.

Officer Kapinos asked [DANE VICTIM] if she feared for her life. [DANE VICTIM] said last night she felt very scared. The second attempt made her feel really scared. Then when she heard Van Duyne's name, she became terrified. [DANE VICTIM] said Van Duyne knows where she lives, he knows where she goes, he knows where her kids are. She said, "That's terrifying."

During Detective Tutaj's contacts with [DANE VICTIM], she has explained to Detective Tutaj how her anxiety levels are very high. [DANE VICTIM] has not been able to sleep in several weeks. [DANE VICTIM] has missed several days of work, for appointments and interviews. [DANE VICTIM] has now missed even more days of work because of her wellbeing. She has had to leave her own residence several times, as she does not feel safe there.

[DANE VICTIM] is very concerned if VanDuyne is released from jail that he will come after her and try to kill her.

VENUE

Your complainant is aware for these incidents involving the [DANE VICTIM] they occurred in Dane County, Wisconsin.

****THIS COMPLAINT IS BASED ON** the information and belief of your complainant, who is a Court Officer for the Middleton Police Department, and who learned of the above offense from the reports of Middleton Police Officer(s) Your complainant is a Court Officer with the Fitchburg Police Department and for this complaint is relying on the written police report(s) submitted by Middleton Officer(s) David Schultz, Gerald Kapinos, Detective Jill Tutaj, Detective Lieutenant Darrin Zimmerman, Janesville Police Officer Nicholas Cervantes and Rock County Sheriff's Office Deputy Jacobs, Michalski, Deputy Simonson, Deputy Lamendola and Detectives Ross Wenger and Beau Douglas, which report your complainant believes to be truthful and reliable inasmuch as they were prepared during the course of the officer(s) 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.