

FILED
08-24-2021
CIRCUIT COURT
DANE COUNTY, WI
2021CF001568

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: William L. Brown Agency Case No.: DCSD 21-257864 Court Case No.: 2021CF001568 ATN: 13006500453602 13006500452331	<i>For Official Use</i>

INFORMATION

The undersigned Assistant/Deputy District Attorney for Dane County, Wisconsin informs the court of the following:

Count 1: FIRST DEGREE INTENTIONAL HOMICIDE

The above-named defendant on and/or between July 1, 2021 and July 8, 2021, 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, 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, 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

STATE OF WISCONSIN - VS - Chandler M Halderson

The above-named defendant on and/or between July 1, 2021 and July 8, 2021, 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.

Count 5: FIRST DEGREE INTENTIONAL HOMICIDE

The above-named defendant on and/or between July 1, 2021 and July 8, 2021, Dane County, Wisconsin, did cause the death of Krista R. 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 6: FALSE INFO ON KIDNAPPED/MISSING PERSONS

The above-named defendant on and/or between July 1, 2021 and July 8, 2021, 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 7: MUTILATING A CORPSE

The above-named defendant on and/or between July 1, 2021 and July 8, 2021, 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 8: HIDING A CORPSE

The above-named defendant on and/or between July 1, 2021 and July 8, 2021, 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.

Date Signed: 08/24/21

Electronically Signed By:

William L. Brown

Deputy District Attorney

State Bar #: 1085130

STATE OF WISCONSIN - VS - Chandler M Halderson

FILED
08-24-2021
CIRCUIT COURT
DANE COUNTY, WI
2021CF001568

JSI STATE OF WISCONSIN	CIRCUIT COURT	DANE COUNTY
STATE OF WISCONSIN Plaintiff, vs.	Ref. Agency: Dane County Sheriff's Office DA Case No.: 2021DA005633 Assigned DA/ADA: William L. Brown Agency Case No.: DCSD 21-257864	
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,	Court Case No.: 2021CF001568 ATN: 13006500453602 13006500452331	<i>For Official Use</i>
	AMENDED CRIMINAL COMPLAINT	

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, 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, 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, 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

The above-named defendant on and/or between July 1, 2021 and July 8, 2021, 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

STATE OF WISCONSIN - VS - Chandler M Holderson

Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

Count 5: FIRST DEGREE INTENTIONAL HOMICIDE

The above-named defendant on and/or between July 1, 2021 and July 8, 2021, Dane County, Wisconsin, did cause the death of Krista R. Holderson, 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 6: FALSE INFO ON KIDNAPPED/MISSING PERSONS

The above-named defendant on and/or between July 1, 2021 and July 8, 2021, 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 7: MUTILATING A CORPSE

The above-named defendant on and/or between July 1, 2021 and July 8, 2021, 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 8: HIDING A CORPSE

The above-named defendant on and/or between July 1, 2021 and July 8, 2021, 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, Michael Wilk, and Detective(s) Sabrina Sims, Brian Shunk, William Hendrickson, Elizabeth Allen, Leslie Keith, Brent Baverstock, George Mayerhofer, Megan Berndt 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

STATE OF WISCONSIN - VS - Chandler M Halderson

missing persons report. This subject verbally identified himself as CHANDLER HALDERSON (the defendant 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.

The defendant 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.

The defendant 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. The defendant identified his parents, Bart A. Halderson ("Bart" hereinafter) and Krista R. Halderson ("Krista" hereinafter).

The defendant 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 the defendant if he knew who the friends were who had picked them up and he stated no. The defendant 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 the defendant why he thought his parents were missing. The defendant 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. The defendant 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 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 the defendant in the evening of July 7, 2021, at the home. The defendant 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. The defendant 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).

The defendant 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, the defendant 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 the defendant 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.

STATE OF WISCONSIN - VS - Chandler M Halderson

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

The defendant said the next time he heard from his parents was on Sunday, July 4, 2021, at approximately 11:00 AM the defendant 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. The defendant 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 the defendant if it was normal for his parents not to contact him when they were at the cabin. The defendant said there isn't cell phone service at the cabin, so it's normal not to have contact with them.

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

Det. Shunk asked the defendant to describe his parent's vehicles. The defendant stated his dad (Bart) drives a Subaru Outback, and his mom (Krista) drives a Volkswagen wagon. The defendant said he is also able to drive both of the vehicles, as he doesn't have a vehicle currently. Det. Shunk asked the defendant if he has driven either of the vehicles since his parents had left. The defendant stated he has driven both of the vehicles. The defendant 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. The defendant said he hasn't driven anywhere else as his concussion symptoms prevent him from driving too far.

The defendant also told Det. Shunk he had remembered assisting his mom with packing her medications on Thursday, July 1. Det. Shunk asked the defendant why he would help Krista pack medications. The defendant said he was bored and was trying to help his parents. The defendant said he removed his mom's medications from the bottles and placed them into snack sized Ziploc bags. The defendant said he packed enough medications to last Krista through Saturday, July 10.

The defendant was asked the normal route his parents would take to get to the cabin. The defendant said they would head north towards Stevens Point, and then towards Antigo. On return trips, the defendant said his parents would routinely come back through Oshkosh. The defendant 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 the defendant 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.

STATE OF WISCONSIN - VS - Chandler M Halderson

Det. Sims reports the defendant 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 the defendant 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 PS]."

Deputy Nelson spoke with PS and 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 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 the defendant, and there was communication by means of pointing to

STATE OF WISCONSIN - VS - Chandler M Halderson

go to the side door, at which time the parties, specifically the defendant, DJK and JM, met at the side door to the garage.

DJK stated it was apparent to him that the defendant 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 a t-shirt.

JM advised she was somewhat embarrassed, as it appeared as though the defendant 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 the defendant, that his parents had been picked up by another couple, sometime around 5:00 AM, for some type of a problem at the cabin. The defendant apparently did not know what exactly the problem was, nor the identity of the individuals they had traveled with.

DJK advised he also asked the defendant about what had happened to his foot during this brief contact. The defendant 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 the defendant to cut his foot. DJK advised the defendant 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 the defendant 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 the defendant about the vehicles being there. The defendant had reiterated they (Bart and Krista) had been picked up earlier that morning by this unknown couple. The defendant 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 the defendant. It was during this conversation, DJK reported that the defendant 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, the defendant 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 the defendant 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 the defendant over to their house for dinner. The defendant had made several statements regarding his beliefs as to his parents' whereabouts and activities which she found completely inconsistent with her observations.

STATE OF WISCONSIN - VS - Chandler M Halderson

MS told Det. Blanke that the defendant'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 the defendant 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 the defendant 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 the defendant 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 the defendant 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. The defendant 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 the defendant showed them around.

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 the defendant 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 the defendant 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, the defendant 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. The defendant 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. The defendant 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

STATE OF WISCONSIN - VS - Chandler M Calderson

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 the defendant'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 the defendant near the grass and wood line. After she saw the defendant 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 shed

CAL told Det. Allen, after that, she saw the defendant 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 the defendant had been out to the property and the topic of target shooting came up. She said she offered the defendant to come out to the property to join in sometime in the future. This is when the defendant 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 the defendant 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, 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.

STATE OF WISCONSIN - VS - Chandler M Halderson

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 the defendant on July 8, 2021

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

On July 8, 2021, Det. Shunk and Det. Hendrickson interviewed the defendant at the Public Safety Building. The following is an excerpt of the interview explaining how the defendant 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"

The defendant: "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?"

The defendant: "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"

The defendant: "downstairs"

Det. Shunk: "Okay"

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

Det. Shunk: "Okay"

STATE OF WISCONSIN - VS - Chandler M Halderson

The defendant: "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, the defendant invoked his rights to an attorney and the interview concluded. The defendant was advised he was under arrest at that point in time and was taken into custody.

As Det. Hendrickson and the defendant 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 the defendant he could not speak with him any longer regarding his missing parents, as he had invoked his right to an attorney only minutes earlier.

The defendant 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 the defendant 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.

The defendant 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, the defendant 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 the defendant at that point in time was they had "found something," and the defendant 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 the defendant if he was suicidal and his response to Det. Hendrickson's question was that he "didn't feel bad about what I did."

Deputy Plenty had a search warrant for the defendant for collecting a DNA sample and also for a search of his person along with photo documentation. Deputy Plenty reports his observations of the defendant, 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 the defendant'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.

STATE OF WISCONSIN - VS - Chandler M Halderson

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 the defendant broke the glass on the fireplace and needed to clean it up. She said the defendant 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 the defendant 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 the defendant 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.

Det. Mayerhofer opened the Ring videos and observed an individual identifying himself as the defendant 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 the defendant identified himself to KB's sister (whose name forms the initials JL), Det. Mayerhofer heard the defendant 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. The defendant asks "did they captured anything on?" JL begins to answer then the defendant begins to inspect the camera system and JL is seen walking to the driveway portion with the defendant.

STATE OF WISCONSIN - VS - Chandler M Halderson

AJS's Statement

On July 9, 2021, Det. Mayerhofer made contact with a friend of the defendant, whose name forms the initials AJS. AJS reported he came to visit the defendant 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 the defendant. 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 the defendant had ammunition for the firearm. AJS said yes, that he left the defendant with 480 rounds of steel case 7.62 X 39 ammunition.

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

Det. Mayerhofer asked AJS if the defendant had magazines for the firearm. AJS said he gave two magazines to the defendant and watched the defendant 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.

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.

STATE OF WISCONSIN - VS - Chandler M Halderson

Dr. Breslauer informed Deputy Schneider that the fragments found were 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

Det. Blanke reports he reviewed photos and other data acquired from CMM's phone obtained between July 1, 2021 and July 8, 2021. Det. Blanke noted there was a photo located with a created, accessed, and modified date of July 3, 2021 at 8:58:34 am.

The photo depicts a map which appears to have generated either from Snapchat or the "find my" application available on iPhones. The photograph appears to be in the Sauk City area, in the upper left hand, the time is recorded as 8:58 am. In the center of the screen, the word "Roxbury" appears, along with a temperature of 67 degrees Fahrenheit. This photo appears to have been taken on the eastern vicinity of the Wisconsin River from the Sauk City/Prairie du Sac area. The Ruth Culver Community Library can be seen as a landmark. As can HWY 60 crossing the Wisconsin River. Directly across from the Ruth Culver Community Library, an animated male picture is depicted and under it is the word "hubby4m"

In reviewing the data from CMM's phone Det. Blanke noticed "hubby" is the contact name CMM frequently uses for the defendant.

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.

Det. Feeney reports on July 14, 2021, law enforcement responded to the DNR property located in the Town of Roxbury at Hwy 188 at Jensen Dr. to search an area the defendant was seen at by a witness as well as Snapchat location noted above.

Det. Feeney reports he received a phone call from Det. Lukens indicating they believed they have located some human remains on the DNR property. The remains were located approximately 200 yards to the west of HWY 188, just south of Old 60 Rd.

Upon stepping into the wooded area, Det. Feeney observed an item, which he recognized to be a human leg. The leg appeared to be severed near the thigh area, but was intact below the thigh all the way down to the foot. Next to the intact leg, there appeared to be a larger chunk of

STATE OF WISCONSIN - VS - Chandler M Halderson

rotted human flesh, approximately eight inches, believed to potentially be a, piece of thigh. In the same area, there was also a severed foot, believed to be a left foot. Det. Feeney observed the leg appeared to be somewhat smaller in stature.

Approximately 10 to 15 feet southeast of where the human leg was located, there was another approximate football or slightly bigger than a football sized body part located as well. Det. Feeney observed there to be bone protruding from one end of the yellow colored object, which again appeared to be a human body part which was severed.

Autopsy of Human Legs

On July 16, 2021, Det. Baverstock reports he attended the autopsy of the remains recovered from the DNR property. The autopsy was completed by Dr. Agnieszka Rogalska.

After the completion of the autopsy, Det. Baverstock met with Dr. Rogalska to discuss her findings. She informed him the four pieces of human remains appeared to be two human legs. One of the legs (left leg) was separated into three pieces. The combined pieces of the left leg appeared to be consistent to belonging to the same human being as the right leg. Both legs were detached from the body by the use of tools and cutting instruments below the hip and through the upper portion of the femur bones of both legs.

Dr. Rogalska informed Det. Baverstock the legs appeared to come from a female based on the appearance and measurements taken. Dr. Rogalska also informed Det. Baverstock the feet were sized approximately of a female sized 8 or 8.5 shoe. This is consistent with the size of the shoes worn by the missing female in this case, Krista Halderson. The legs were also removed from their body after death. Based on these observations and her recollection of the remains located of Bart Halderson, Dr. Rogalska informed Det. Baverstock these legs very likely did not belong to Bart Halderson.

Dr. Rogalska informed Det. Baverstock there were noticeable differences in the types of ways the body parts were separated. There were different tool marks at the various locations of separation. Dr. Rogalska informed Det. Baverstock this was also the case on the identified torso of Bart Halderson.

DNA Confirmation of Krista's Remains

Deputy Plenty reports Dr. Rogalska collected six samples from the remains and had packaged them, then giving them to him. These were DNA samples to be given to the state crime lab for comparison.

Det. Shunk reports on July 29, 2021, he received an email from Daniel Campbell, who is a DNA Forensic Scientist Supervisor at the Wisconsin State Crime Lab. Attached to the email was a DNA analysis report, which referenced this case.

After reviewing the report, Det. Shunk noted the conclusion was that a portion cut from the left leg tissue identified Krista R. Halderson as the source. The report states, "Given that Bart A. Halderson is the biological father of MAH, it is at least 413 billion times more likely to observe the profile from MAH if the female profile detected from the left leg tissue is his biological mother than if a random, unrelated female is the mother."

STATE OF WISCONSIN - VS - Chandler M Halderson

The report documents for the analysis, a dried blood standard from Bart Halderson, an electric toothbrush head reportedly used by Krista Halderson, and buccal swab standard from MAH were used to come to the conclusion.

Your complainant is aware MAH is the defendant's brother.

Det. Shunk reports during a briefing on August 5, 2021, Dr. Rogalska spoke about her findings from the autopsy of the human remains which were located in the Town of Roxbury. Dr. Rogalska stated during the briefing that the remains, identified as one leg and portions of another leg, were approximated as to be from the same person. Dr. Rogalska stated the legs had post mortem cuts, indicated by the lack of hemorrhaging observed. Dr. Rogalska stated samples of tissue from each portion of the legs were obtained to submit for DNA analysis.

During a meeting on August 19, 2021, and on a phone call on August 20, 2021, statements were clarified with Dr. Rogalska in regards to the human leg portions which were located in the Town of Roxbury.

Dr. Rogalska stated the leg portions were "removed post mortem," and the "autopsy findings support post mortem mutilation." Dr. Rogalska went on to say the cuts through the legs were made with "no evidence of surgical or medical intervention."

Dr. Rogalska stated after reviewing the DNA analysis report from the Wisconsin State Crime Lab, she agreed that DNA evidence supported that one of the left leg portions had been identified as belonging to Krista Halderson, and the portions of the left leg together could be approximated to match the right leg, meaning they are believed to have come from the same person.

Dr. Rogalska stated further analysis is pending on the portions of the legs which couldn't be identified through initial DNA analysis.

Video Surveillance & Krista's Last Known Whereabouts

Deputy Michael Wilk reports he reviewed video surveillance obtained from a residence on Oak Springs Circle. This video views the driveway, front entry and portions of the front yard of 4595 Oak Springs Circle.

Deputy Wilk reports Krista was known to drive a 2004 Volvo station wagon. In review of the video surveillance from July 1, 2021 at 07:27:54 a.m., the Volvo backs out of driveway to travel east on Oak Springs Circle.

On July 8, 2021, Det. Mayerhofer reports he spoke with Krista's supervisor, whose name forms the initials CFV. CFV reported Krista left work on Thursday July 1, 2021 at 4:58 p.m.

Deputy Wilk reports on review of the surveillance video on July 1, 2021 at 05:12:57 p.m. the Volvo pulls straight in to driveway from east of the residence. Then on July 1, 2021 at 8:16:57 p.m. the Volvo backs out of driveway and travels east on Oak Springs Circle.

Det. Berndt reviewed July 1, 2021 video footage from the Kwik Trip in the 4300 block of Windsor Dr, Village of Windsor, Dane County, Wisconsin. While observing the exterior cameras at approximately 8:22 p.m., Det. Berndt observed a dark colored Volvo parked in the

STATE OF WISCONSIN - VS - Chandler M Halderson

farthest right parking stall facing the front entrance of the store. At approximately 8:22 p.m., the camera captures the driver's side door of a dark colored Volvo opening. After the door opens, Det. Berndt observed the lower legs and feet of an unidentified individual. Due to the camera continuously moving, she noticed the next camera still to be an individual walking on the path toward the front entrance of the store.

At 8:23 p.m., Det. Berndt observed a male walk into the front entrance door. Upon entering, he immediately turns right. He is seen walking to an ice cooler located on the right side of the store, near the ATM machine. He retrieves two bags of ice. As he turns around, back in the direction he came from. He is seen with two bags of ice, one in each hand. The individual is identified as a white male, wearing jeans, Black long sleeved shirt with an orange design on the front, a dark colored baseball hat, athletic style shoes, and face mask. At 8:24 p.m., the male walks to the front register and pays for the ice.

At 8:24 p.m., the male appears to pay. He is then seen walking out the front entrance door with one bag of ice in each hand. He walks on the path near the dark colored Volvo.

At 8:26 p.m., the dark colored Volvo is seen exiting the parking lot through the front entrance, the vehicle then takes a right back onto Windsor Rd.

Deputy Wilk noted in review of the surveillance video from Oak Springs Circle, at 8:29:39 p.m. the Volvo pulls straight into driveway from east of the residence.

On July 19, 2021, Det. Berndt was provided a copy of the receipt from the above mentioned purchase. Det. Berndt observed on the receipt a date of July 1, 2021 8:24p.m. The location was Kwik trip, located in the 4300 block of Windsor Rd. Tax Description, Ice Nugget Bag 10 Lb. There were two bags which were purchased, totaling \$3.98. The male paid using a Venmo Debit card. The last three digits of the card were 075. At the bottom of the receipt the words "Verified by PIN" were printed.

Det. Berndt was provided information the defendant made a \$3.98 transaction using his Venmo bank card at the Kwik Trip located in the 4300 block of Windsor Road in Windsor.

Victims' Phones and Identification Located

Deputy Plenty reports on July 28, 2021, he responded to 4595 Oak Springs Circle to process the residence in regards to this investigation.

Deputy Plenty reports he went to the garage and located a pair of shoes under a shelving unit. In the right shoe, Deputy Plenty observed there was a foiled wrapped item. Deputy Plenty opened the tin foil package. The foil was doubled up, giving two layers of foil around the packaging. Upon opening the package, he saw there was paper towel, also wrapped around the contents of the items inside. He opened up the paper towel and observed the driver's license which was present was for Bart Halderson. Underneath the identification and black in color iPhone, Deputy Plenty observed there was another identification card/driver's license which came back to Krista Halderson. The second cell phone, which was underneath this driver's license, was white in color.

STATE OF WISCONSIN - VS - Chandler M Halderson

Phone Records

Det. Sims is aware that during this investigation, Det. Blanke wrote a search warrant for U.S. Cellular phone records for the phone numbers used by Krista, Bart and the defendant.

Det. Sims reviewed the U.S. Cellular records with the assistance of WI Department of Criminal Investigation Criminal Analyst Courtney Ripp. They reviewed U.S. Cellular records for cell phone ending in 4998, which is the phone number used by Krista Halderson and phone number ending in 4549, which is the number used by the defendant.

Upon review of the U.S. Cellular records, the last activity on Krista's device (ending in 4998) is at 6:41:41AM on July 2, 2021 until 11:02:04AM on July 4, 2021. Between those times, all incoming calls were routed to voicemail, there was no outgoing activity, and the short message service (SMS) messages which were sent to Krista's device were not delivered until July 4, 2021.

SMS text sent from the defendant's device to Krista's on July 4, 2021 occurred at 11:02:58AM and 11:03:08 AM. The defendant's device utilized tower 550107 (which Det. Sims knows to be located in the 500 block of Linde Street, Deforest, Dane County, Wisconsin). Krista's device utilized tower 782422 (despite the naming convention), both towers mentioned have the same latitude/longitude location in the 500 block of Linde Street.

SMS text sent from Krista's device to the defendant device on July 4, 2021 occurred between 11:04:25-11:04:28 AM. Krista's device and the defendant's device utilized the same towers previously mentioned in the 500 block of Linde Street.

Det. Sims is aware of the content of the July 4, 2021, 11:04 AM text message from Krista to the defendant from the interview conducted with the defendant on July 7, 2021 when he reported his parents missing. Det. Sims and Det. Shunk looked at the defendant's call logs and the text message he said came from his mom.

After the interview, the defendant sent screenshots of his phone call logs and text messages from his mom to Det. Shunk. The content of those texts from Krista to the defendant was "Made it safely, can't get anything through, and yes it's packed. Going to white lake today for the parade and will be home Monday night/Tuesday early. Love you lots!!" Det. Sims was also aware through this investigation the White Lake Independence Day Celebration and parade was held on Saturday, July 3, 2021 at 2pm.

Google Searches

On August 18, 2021, Det. Sims reviewed documents received after a search warrant was issued to Google for the defendant's identified account. This warrant was issued to receive content from June 30, 2021 through July 8, 2021.

Det. Sims noted the following items were searched on July 8, 2021:

9:44:30 a.m., "Body found Wisconsin."
9:44:41 a.m., "Woman's body found in Wisconsin."
9:44:50 a.m., "Wisconsin dismembered body found."
9:45:25 a.m., "Dead body found in Wisconsin."
9:45:40 a.m., "Body found in Milwaukee River 2021."

STATE OF WISCONSIN - VS - Chandler M Halderson

3:12:46 p.m., "Bart and Krista."

Your complainant is aware at the time the Google searches were conducted in the morning of July 8, 2021, the Dane County Sheriff's Office had not located any human remains as part of this investigation. Your complainant is aware the human remains of Bart Halderson were located at approximately 3:00 p.m. on July 8, 2021.

Medical Expert

Your complainant believes the information from Dane County Medical Examiners/Doctor Cori Ann Breslauer and Agnieszka Rogalska 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 Collins-LaFevre, Greg Leatherberry, Daniel Feeney, James Plenty, Erik Schneider, Michael Wilk, and Detective(s) Sabrina Sims, Brian Shunk, William Hendrickson, Elizabeth Allen, Leslie Keith, Brent Baverstock, George Mayerhofer, Megan Berndt 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
08/24/21

Electronically Signed By:
Andrea B. Raymond
Deputy District Attorney
State Bar #: 1068164

Electronically Signed By:
Dawn Leatherberry
Complainant