

FILED  
01-14-2019  
Barron County, WI  
Sharon Millermon  
2019CF000020  
Honorable James C.  
Babler  
Branch 1

STATE OF WISCONSIN	CIRCUIT COURT	BARRON COUNTY
STATE OF WISCONSIN	Plaintiff,	DA Case No.: 2019BA000046 Assigned DA/ADA: Brian H Wright Agency Case No.: 1831604 Court Case No.: 19 CF 20
-VS-		
Jake T Patterson 14166 S Eau Claire Acres Circle Gordon, WI 54838 DOB: 06/17/1997 Sex/Race: M/W Eye Color: Hair Color: Height: ; Weight: ; Alias:		ATN: 03002000160781
Defendant,		<b>Criminal Complaint</b>

The undersigned, on information and belief, being first duly sworn, states that:

**Count 1: FIRST DEGREE INTENTIONAL HOMICIDE**

The above-named defendant on or about Monday, October 15, 2018, Barron County, Wisconsin, did cause the death of James M Closs , 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: FIRST DEGREE INTENTIONAL HOMICIDE**

The above-named defendant on or about Monday, October 15, 2018, Barron County, Wisconsin, did cause the death of Denise J Closs , 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 3: KIDNAPPING**

The above-named defendant on or about Monday, October 15, 2018, Barron County, Wisconsin, by force or threat of imminent force, did carry J.L.C. , from one place to another without that person's consent and with intent to cause the victim to be secretly confined, contrary to sec. 940.31(1)(a), 939.50(3)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 4: ARMED BURGLARY**

The above-named defendant on or about Monday, October 15, 2018, Barron County, Wisconsin, did intentionally enter a dwelling without the consent of the person in lawful possession of the place, and with intent to commit a felony , kidnapping , while armed with a

dangerous weapon, a shotgun, contrary to sec. 943.10(2)(a), 939.50(3)(e) Wis. Stats., a Class E Felony, and upon conviction may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than fifteen (15) years, or both.

#### **PROBABLE CAUSE:**

Basis for this complaint is a statement by Jeff Nelson that he is a Detective with the Barron County Sheriff's Department and as such has access to all reports and complaints filed with his department. Complainant is informed by the reports of Deputy James Pressley, Deputy Jon Fick, Deputy Erik Sedani, Detective Mary Dexter and Detective Jason Hagen of the Barron County Sheriff's Department and Deputy Dittbrender, Deputy Carey and Sgt. Derosia with the Douglas County Sheriff's Department.

Deputy James Pressley, with the Barron County Sheriff's Department, reports on October 15, 2018, at approximately 12:53 AM, he and other deputies were in the Barron County Dispatch Center when a 911 call came in. Deputy Pressley reports screaming could be heard in the background. Dispatch advised that the 911 call had originated from 1268 13 1/2 Avenue/U.S. Hwy. 8, west of the City of Barron. Deputy Pressley indicates in his report that the location of the 1268 13 1/2 Avenue address is approximately three miles from the Dispatch Center, which is located inside the Barron County Justice Center. Deputy Pressley reports that he, along with Deputy Erik Sedani and Deputy Jon Fick, responded to the dispatch arriving at the residence located at 1268 13 1/2 Avenue/U.S. Hwy. 8, Barron County, Wisconsin, at approximately 1:00 AM.

Deputy Fick reports that, while in route to the residence, he observed a vehicle that was maroon in color and what he believed to be an older style vehicle. Deputy Fick reports that, based on his training and experience, the vehicle appeared to him to be an older Ford Taurus or similar vehicle. As the vehicle was traveling east on U.S. Hwy. 8, Deputy Fick reports he was traveling west on U.S. Hwy. 8, just west of the City of Barron. Deputy Fick reports the vehicle he observed was the lone eastbound traveling vehicle he encountered. Deputy Fick observed the vehicle yield to himself and other deputies responding to the scene. Deputy Fick reports he was unable to see a front license plate and observed a black bracket in the front middle of the bumper. Deputy Fick reports he observed grey or silver trim on the vehicle.

Upon arrival, Deputy Pressley reports there were no outside lights on at the residence and no screaming or signs of distress consistent with the 911 call coming from inside. Deputy Pressley reports he observed there was a light on in the residence in the upstairs northwest corner window. As he walked around the back of the residence, Deputy Pressley observed an upstairs light on the back side of the residence.

Deputy Sedani reports he was advised by Deputy Pressley to go to the front door and attempt to make contact. Deputy Sedani reports he shined his flashlight towards the front door. Deputy Sedani had difficulty seeing through the glass storm door due to it having heavy condensation on it, but noticed that the wooden inside door was open. Deputy Sedani reports he shined his flashlight again to the door and noticed the glass door was partially open due to a rug being stuck between the door and door frame. When he looked inside the residence, Deputy Sedani saw legs on the floor. Deputy Sedani reports he opened the glass door and looked in and saw

an adult male, who was later identified as James M. Closs, lying on the floor with his feet near the front door.

Deputies observed that James was deceased. He had significant trauma to his face and head. There was blood and brain splattering on the west wall directly behind the wooden entrance door. Detective Jeff Nelson, with the Barron County Sheriff's Department reports that, based on his training and experience, the head and face trauma to James appeared to be that of a gunshot wound.

Deputy Sedani reports that he and Deputy Pressley announced their presence and directed anybody inside to come out of the residence. Deputy Sedani reports no one came out of the residence and there was no sound of anybody inside the residence. Deputy Sedani observed a spent shotgun shell next to James' body that was on the floor and another spent shotgun shell in the hallway in front of the bathroom.

Deputy Sedani reports that he, Deputy Pressley and Deputy Fick entered the residence. Partially in the bathroom and hallway, Deputy Sedani observed a shower curtain laying on the floor. As deputies moved further into the residence, Deputy Sedani observed an adult female with red hair, who was later identified as Denise J. Closs, sitting unresponsive in the shower.

Deputies observed that Denise was deceased. She, too, had significant head trauma. Detective Nelson reports that, based on his training and experience, the head trauma to Denise also appeared to be that of a gunshot wound to the head with the rear backside of her head and skull plate being completely removed and lying next to her body in the bathtub.

Deputies searched the remainder of the house and located no one else inside. Deputy Pressley reports that, once the ambulance arrived, he escorted Mark Price, a paramedic with Mayo Clinic Medical Transport, into the residence. Deputy Pressley reports Mark visually examined James and Denise and confirmed the deputies observations that both of them were deceased and no life-saving measures were necessary.

Detective Mary Dexter, with the Barron County Sheriff's Department, reports that she was present for the autopsies of James and Denise. Detective Dexter reports the autopsies were performed by Dr. Veena Singh, at the Midwest Medical Examiner's Office located at 14341 Rhinestone Street NW, Ramsey, Minnesota. Detective Dexter reports she received and reviewed the final autopsy reports prepared by Dr. Singh. Dr. Singh determined the cause of death to James was a shotgun wound of the head and neck, and the manner of death was ruled a homicide. Dr. Singh determined the cause of death to Denise was a shotgun wound of the head, and the manner of death was ruled a homicide.

Detective Nelson reports he entered the residence on October 15, 2018, at approximately 1:45 AM. Detective Nelson observed there were lights on in the main floor master bedroom in the northwest corner of the residence and the main floor bathroom of the residence. Detective Nelson observed that James was lying on his back with his head partially under the kitchen table and chairs. James was lying in an east to west direction. Detective Nelson observed that James' body was located in front of the wooden entry door and that James' legs obstructed the full opening of that door.

Detective Nelson reports the wooden entry door had been forcibly entered. Detective Nelson observed that the decorative glass on the wooden entry door was shattered out and also noticed that, near the deadbolt locking mechanism on the door, there was heavy damage. Detective Nelson reports, on the basis of his training and experience, it appeared the door had been shot with a shotgun slug shell in the area of the deadbolt lock.

Detective Nelson observed that Denise was seated in the bathtub on the main floor of the residence. Detective Nelson reports her head was lying against the lower bathtub. Detective Nelson observed a vinyl shower curtain and curtain rod lying on the bathroom floor and partially extending into the hallway. Detective Nelson reports the bathroom door swings inward into the bathroom. Detective Nelson observed that the top upper right hand cabinet drawer had been pulled out approximately six inches. Detective Nelson reports that, based on his training and experience, it appeared Denise had attempted to barricade herself in the bathroom.

Detective Nelson reports it was apparent the assailant had forcibly kicked or pushed or breached the door in some manner which had caused a rectangle style part of the door to break free from the door and fall into the open drawer. Detective Nelson reports the bathroom door itself then had been kicked or breached or forcibly manipulated in such a manner where it had basically split in two in a horizontal manner prior to being forcibly opened. Detective Nelson observed a cell phone lying with the screen side down on the floor near the door jam and hinge side of the bathroom door.

Detective Jason Hagen, with the Barron County Sheriff's Department, reports that evidence observed at the scene included a 12 gauge shotgun shell located on the ground outside the residence next to the concrete steps that access the front doorway where James was found. A second spent 12 gauge shotgun shell was located next to James' body. A third spent 12 gauge shotgun shell was located on the floor in the hallway directly in front of the bathroom on the main level where Denise's body was located. Detective Hagen reports there were some tread patterns visible in blood that was in the entry way just inside the main door of the home next to James' body. Detective Hagen reports the tread patterns appeared to be from tactical type boots.

Detective Nelson reports that, as he and other officers were continuing their investigation of the inside of the residence, he received a phone call from Detective Dexter and Detective Carroll, who advised that James and Denise have a 13-year old daughter that also resided with them at the residence. She was identified as J.L.C. Detective Nelson reports throughout that morning a Wisconsin Crime Alert was issued as well as an Amber Alert regarding the abduction of J.L.C.

Deputy Dittbrender, with the Douglas County Sheriff's Department, reports on January 10, 2019 at approximately 4:11 PM, she was dispatched along with Deputy Carey, with the Douglas County Sheriff's Department, to an address on Eau Claire Acres Circle, in the Town of Gordon, Douglas County, Wisconsin, for a report that J.L.C. was at the residence located at 14102 S. Eau Claire Acres Circle and needed help. While in route, Deputy Dittbrender reports the Douglas County Communications Center provided additional information obtained during the 911 call. The additional information provided included information that Jeanne Nutter, a neighbor of Peter and Kristen Kasinskas, was currently at the Kasinskas residence with J.L.C.

and that J.L.C. had stated a male subject, whom she identified as Jake Patterson, had killed her parents and she wants to go home.

Deputy Dittbrender reports that she and Deputy Carey, along with Sgt. Engelman, arrived at the Kasinskas residence on January 10, 2019 at approximately 4:43 PM. Deputy Dittbrender reports J.L.C. was wearing a pair of dirty, worn New Balance athletic shoes, that appeared to be men's shoes, with the left shoe on her right foot and the right shoe on her left foot. Out of a concern that Patterson might be in the area attempting to locate J.L.C., Deputy Carey reports the decision was made to immediately remove J.L.C. from the area for her safety. Deputy Carey reports that Deputy Dittbrender drove J.L.C. away in her squad car with Sgt. Engelman following in his squad car. Deputy Carey and Sgt. DeRosia remained at the Kasinskas residence.

Deputy Dittbrender reports that, as she was traveling along the western side of the loop of Eau Claire Acres Circle northbound to County Hwy. Y, she observed a vehicle approaching eastbound on Hwy. Y and then turn south onto Eau Claire Acres Circle as Deputy Dittbrender approached the intersection. Deputy Dittbrender observed the vehicle was red in color and possibly either a Kia or Ford as the vehicle passed her. Deputy Dittbrender reports she asked J.L.C. if that was Patterson's car and J.L.C. stated she didn't know. J.L.C. indicated that she thought his car was a Ford, and that he also had other cars. Deputy Dittbrender reports she notified Sgt. Engelman and Sgt. Derosia of the red car she had just passed.

Sgt. Derosia reports that Sgt. Engleman ran the plate on the vehicle. Sgt. Derosia reports dispatch advised the vehicle was registered to a Katie Patterson, the last name matching the name of the male subject J.L.C. had identified. Sgt. Derosia reports he positioned his squad car in a way so he could observe the vehicle as it passed his location. Sgt. Derosia reports as the vehicle passed by him, he observed a lone male occupant driving the red colored vehicle. Sgt. Derosia reports he also observed the vehicle's drivers side rear taillight was broken, as well as no functioning rear license plate light. Sgt. Derosia reports he pulled out and followed behind the vehicle while waiting for another squad.

As he was following the vehicle, Sgt. Derosia observed that it passed the driveway of the address that was listed for that vehicle at 14166 S. Eau Claire Acres Circle, in the Town of Gordon, Douglas County, Wisconsin. Sgt. Derosia reports he conducted a traffic stop on the vehicle just as it passed the driveway. Sgt. Derosia reports he approached the driver's side door while Sgt. Engleman approached on the passenger side. Sgt. Derosia reports the driver and lone occupant in the vehicle was instructed to raise his hands in the air. Sgt. Derosia reports he then instructed the driver to open his door. Once the door was opened, Sgt. Derosia asked the driver what his name was. The driver informed Sgt. Derosia that his name is Jake Patterson. Sgt. Derosia reports he instructed Patterson to step out of the vehicle and, as he did, Patterson stated I know what this is about "I did it".

Deputy Carey reports he interviewed Jeanne. Jeanne stated that she went for a walk around Eau Claire Acres Circle around 3:30 PM. She estimated the walk took around 40 minutes. When she returned to her driveway, she saw a young girl in the road. Jeanne stated the girl yelled and begged for help. Jeanne stated she remembered the girl specifically say, "I'm Jayme Closs," "I don't know where I am," "He killed my parents," and "Please help - I want to go home." Jeanne estimated it was around 4:10 PM when she came upon J.L.C.

Jeanne stated she made the decision to go to the Kasinskas residence because, though she did not know Patterson, she recognized his name from a mailbox and knew that his cabin was only two driveways west from her place. Jeanne described J.L.C. as being in shock, tired, with matted hair and messy clothes. Jeanne observed that J.L.C. was wearing large men's shoes on her feet and could barely walk in them.

Detective Hagen reports on January 11, 2019 at approximately 9:15 AM, he observed a live viewing of the interview of J.L.C. Bonnie Fries, a Child/Adolescent Forensic Interviewer with the FBI, interviewed J.L.C. Detective Hagen reports the interview was audio and video recorded.

On the night J.L.C. was abducted, J.L.C. stated she was asleep in her bedroom when her dog started barking early in the morning. J.L.C. stated she got up to investigate why her dog was barking and noticed there was someone driving up their driveway. J.L.C. stated she went to her parents' room and woke them up. J.L.C. stated her parents got up and her father went to the door to see what was going on. J.L.C. stated there was a man (later identified as Patterson) at the door with a gun, so she and her mother hid in the bathroom with the door closed. J.L.C. stated that she and her mother hid in the bathtub.

J.L.C. stated she heard a gunshot and knew her father had just been killed. J.L.C. stated her mother had her cell phone with her and used the phone to call 911. J.L.C. stated Patterson broke down the bathroom door and told her mother to hang up the phone. J.L.C. stated Patterson told her mother to put tape over J.L.C.'s mouth, which her mother did, and then Patterson shot her mother. J.L.C. stated both her mother and father were shot one time.

J.L.C. stated the first time she saw Patterson was in the bathroom where she and her mother were hiding. J.L.C. stated Patterson was dressed in black from head to toe, including a face mask, hat, and gloves.

J.L.C. stated that Patterson taped her hands and ankles together and dragged her out to his car. J.L.C. described the tape as being black in color. J.L.C. stated Patterson taped her hands such that her hands were behind her back. When they got to Patterson's car, J.L.C. stated Patterson placed her in the trunk. J.L.C. described Patterson's car as an older red 4-door car. After Patterson put her in the trunk, J.L.C. stated he drove away. J.L.C. stated she heard the sirens of two squad cars drive by a very short time after Patterson began driving.

J.L.C. stated she thought she was in the trunk of the car for about two hours before they arrived at the house where Patterson took her to. J.L.C. stated Patterson later told her it was his house. J.L.C. stated she observed Patterson to be wearing the same clothing he had on when he shot her parents, when he removed her out of the trunk at the house he had taken her to. When they got to the house, J.L.C. stated Patterson took her to a hallway and made her sit down and stay there. J.L.C. stated he then removed the tape from her mouth, hands, and ankles. After that, J.L.C. stated Patterson told her to go into his bedroom and take off all of her clothes. J.L.C. stated that, after she disrobed, Patterson put her clothes in a bag. J.L.C. stated Patterson made a comment about not having evidence. J.L.C. stated Patterson told her he was going to throw her clothes away but she didn't see what he actually did with them after that.

J.L.C. stated that sometimes Patterson would have friends and/or relatives over. J.L.C. stated that Patterson made it clear that nobody was to know she was there or bad things would happen to her. In order to hide the fact that J.L.C. was there, Patterson made J.L.C. hide under his bed in his bedroom. J.L.C. stated Patterson's bed was in one corner of his bedroom. When he made her hide under his bed, J.L.C. stated he stacked totes and laundry bins around the bed with weights (like weights for barbells) stacked against them so she could not move them without his being able to detect it if she did. One time, J.L.C. stated she accidentally moved one of the totes when she was told to hide under the bed and Patterson told her something bad would happen if she did it again. J.L.C. stated Patterson would turn music on in his room so she couldn't hear what was happening if there was anyone else in the house with him.

J.L.C. stated Patterson would also make her stay under the bed when he left the house. J.L.C. stated Patterson would make her stay under the bed for up to twelve hours at a time with no food, water, or bathroom breaks. J.L.C. described how, on one occasion, Patterson got mad at her and hit her "really hard" on her back with what she described as a handle for something used to clean blinds and that it hurt really bad when Patterson hit her with it. J.L.C. stated she did not specifically remember what she did to make him mad on that occasion, but she remembers Patterson telling her that if it happened again the punishment would be worse next time.

On January 10, 2019, J.L.C. stated Patterson left his house and told her he was going to be gone for five or six hours. J.L.C. stated Patterson made her go under the bed before he left. After Patterson left the house, J.L.C. stated she was able to push the bins and weights away from the bed and crawl out. J.L.C. stated she put on a pair of Patterson's shoes, walked out of the house, and walked towards the road to a woman (Jeanne Nutter) who she saw walking a dog. J.L.C. stated she told Jeanne who she is and that Jake Patterson kidnapped her. J.L.C. stated Jeanne then took her to the closest house where they called 911.

Detective Nelson reports on January 10, 2019 at approximately 7:15 PM he, along with Special Agent Joe Welsch, with the Wisconsin DOJ/DCI, conducted a custodial interview of the defendant Jake T. Patterson, whose date of birth is June 17, 1997. Detective Nelson reports he read the defendant his Miranda rights. The defendant stated he understood his rights and was willing to speak with Detective Nelson and Special Agent Welsch.

Detective Nelson reports the defendant confessed to killing James and Denise Closs, and kidnapping J.L.C. The defendant stated he worked at Saputo Cheese Factory, south of Almena, for two days before quitting. On his drive to the cheese factory on one of the two mornings he worked there, he had stopped behind a school bus on U.S. Hwy. 8 where he watched J.L.C. get on a school bus. The defendant stated he had no idea who she was nor did he know who lived at the house or how many people lived at the house. The defendant stated, when he saw J.L.C., he knew that was the girl he was going to take.

The defendant stated, on what he thought to be his second and last day of employment at Saputo Cheese, he purchased a black colored balaclava type mask from Walmart, in Rice Lake. The defendant stated he purchased the mask as part of his plan to conceal his identity when he took J.L.C.

The defendant stated he drove to the Closs home twice with the intent to kidnap J.L.C. prior to October 15, 2018. The defendant stated that, several days after quitting Saputo Cheese, and about one week to one and one-half weeks before he went through with his plan to kidnap J.L.C., he drove to the Closs home, but there were all kinds of cars in the driveway and it scared him off. The defendant stated on another night, maybe a day or two later, he again drove to the Closs home and noticed the lights were on in the house and people were walking around in the house so he decided not to do it then.

The defendant stated he put quite a bit of thought into the details of how he was going to abduct J.L.C. On one of the nights, prior to his third trip to the Closs home on October 15<sup>th</sup>, the defendant stated he drove a few miles down the road on County Hwy. D near Sarona and stole the license plates off a vehicle parked in the yard. The defendant stated he stole the license plates because he did not want to get stopped or spotted with his own license plates on his car.

Prior to arriving at the Closs home, the defendant stated he stopped on a side road somewhere east of Barron and removed both the front and rear license plate from his car which he described as an older red colored Ford Taurus, and placed the stolen license plate on the rear of his car. The defendant stated he made other modifications to his vehicle. The defendant stated he removed and disconnected the dome light in the vehicle so that when he exited or entered the vehicle it would not illuminate his presence. The defendant stated he also removed the trunk light and what he described as the glow in the dark kidnapping cord from the trunk so that no one could pull the trunk release once inside.

The defendant stated that, prior to leaving his house, he took his father's 12 gauge Mossberg pump shotgun which he described as having a black stock and a silver or chrome-colored finish on the barrel. The defendant stated that he selected this particular gun because he had done research and knew that the Mossberg brand shotgun was one of the most heavily manufactured or owned shotguns and assumed it would be more difficult to trace. The defendant stated he took out six 12 gauge shotgun shells, which he described as being slug shotgun shells from an ammo box in the garage. The defendant stated he felt that a 12 gauge slug would inflict the most damage on someone and would most likely be the best choice of shell and weapon to kill someone verses a rifle.

The defendant stated he wiped down the shotgun shells while wearing gloves and cleaned and wiped down the shotgun while wearing gloves so there would be no fingerprints or DNA on either of them. The defendant stated he did this solely for the purpose of making sure there would be no fingerprints or DNA on the shotgun. The defendant stated he then loaded the six shells into the shotgun while wearing gloves and was confident there would be no DNA or fingerprints left on either the shotgun or the shells.

The defendant described how he shaved his face and shaved all his head hair off and showered before leaving his house. The defendant stated he did this so that he would not leave any DNA or hair at the scene.

The defendant stated he was wearing brown colored leather steel toed work boots and regular blue jeans. The defendant stated he was wearing a black colored jacket and had a black colored balaclava mask on. The defendant also stated he was wearing two pair of gloves on his hands, which he described as regular work gloves.



The defendant stated that, as he arrived near the Closs residence, he shut off his headlights and basically coasted into the end of the driveway. The defendant stated he parked near the end of the driveway, quietly exited his vehicle, and approached the house. The defendant stated he walked on the sidewalk leading up to the front door of the house. As he was walking up the sidewalk, the defendant stated he noticed James standing in the large picture window, which he indicated was to the left of the front door.

The defendant stated he believed James had a flashlight and was shining it outside. The defendant stated he hollered for James to get on the ground, but James kept shining the flashlight and looking outside. The defendant stated he then approached the front steps and opened the glass storm door. The defendant stated he then pounded on the wooden entry door. The defendant stated he saw James looking outside through the small glass (decorative glass with wrought iron design in the center of the wooden entry door) window. The defendant stated James made some comment like, show me your badge, and assumed James thought he was the police. The defendant stated he then raised the shotgun and purposely aimed at James' head and pulled the trigger. The defendant stated he knew James immediately collapsed to the ground.

The defendant stated he then used his shoulder and tried to break the door open, but was unable to do so. The defendant stated he then ejected the spent shotgun shell, lowered the shotgun toward the doorknob and fired a second round. The defendant stated he then used his shoulder and, after one or two pushes, the door opened up. After stepping into the house, the defendant stated he stepped across James' body and knew James was dead.

The defendant stated he brought a kitchen type knife that he had in his pocket and a flashlight with him that night. The defendant stated there were no lights on in the house, so he shined his flashlight around the house and noticed that the door straight ahead of him was shut. The defendant stated he approached the door and it was closed. The defendant stated he quickly walked through other rooms in the house scanning to see if anyone was in any of the other rooms. The defendant stated he did not see anyone and so he then re-approached the closed door that he had initially seen. The defendant stated the door was locked and barricaded and he kicked it and shouldered it several times trying to forcibly break it open. The defendant estimated that it took him anywhere from 10 to 15 hits with his shoulder before it burst open and he entered into the bathroom. The defendant stated the bathroom curtain was shut and he reached up and grabbed it and ripped it off the rod and threw it onto the floor. The defendant stated that Denise and J.L.C. were seated in the bathtub, Denise with her arms wrapped around J.L.C. in a bear hug.

The defendant stated he pulled out a flattened partial roll of black colored Gorilla brand duct tape, handed it to Denise, and told her to place the tape over J.L.C.'s mouth. The defendant stated Denise was struggling to do that and he set the shotgun down on the bathroom sink. The defendant stated he took the tape from Denise and wrapped tape around J.L.C.'s mouth, and completely around her head. The defendant stated he then had J.L.C. stand up where he then took tape and placed it around her wrists, with her palms together to restrain her hands and arms. The defendant stated he then took the tape and wrapped it around J.L.C.'s ankles. The defendant stated he then removed J.L.C. from the bathtub. With J.L.C. standing bound next to him in the bathroom, the defendant stated he picked up the shotgun, aimed for

Denise's head and pulled the trigger as he started to turn away. The defendant stated he aimed for Denise's head because he knew that head shots were the best way to kill a person.

The defendant stated he had the shotgun in his one hand, and he reached his arm around J.L.C.'s body and began to drag her out of the house. As he was doing so, the defendant stated he nearly slipped in the blood that had pooled on the floor. The defendant stated he dragged J.L.C. across the front yard toward his car. At one point, the defendant stated he told J.L.C. that she needed to walk and then realized that she couldn't because he had taped her legs together at the ankles. The defendant stated he drug her across the yard where he then dropped her near the driver's side door of his car. The defendant stated he then popped the trunk open, dragged J.L.C. to the back of the car, put her in the trunk, and then locked the trunk shut.

The defendant stated he then got in his car, removed his mask, and started to drive towards Barron. The defendant stated he had only driven what he thought to be 20 seconds from the house when he yielded to three passing squad cars that were traveling west towards the house with their red and blue emergency lights and sirens on.

The defendant stated he was determined he was going to take J.L.C. that night and was going to kill anyone in the house because he could not leave any eyewitnesses behind. Asked what he would have done if he was stopped by the police on the way to his house, the defendant stated he still had the loaded shotgun in the front seat of the car with him. The defendant stated he most likely would have shot at the police. The defendant estimated he was at the Closs home for only about four minutes total.

The defendant stated that, once he got to his house, which he indicated is located at 14166 S. Eau Claire Acres Circle Road, in Gordon, Wisconsin, he removed J.L.C. from the trunk and drug her into his house and into his bedroom. The defendant state he cut off the tape and knew J.L.C. was extremely scared, and she was crying. The defendant stated he knew J.L.C. was scared because she had urinated herself and her clothing was wet. The defendant stated he told J.L.C. to change into his sister's pajamas. The defendant stated he then took her clothing, the duct tape, and the two pair of gloves he had worn and threw them into a wood fireplace in the basement of the house.

The defendant stated he kept J.L.C. at his house by creating a space under his bed. The defendant stated his bed, which he indicated is a twin size bed, sits approximately 2 1/2 feet off the ground. The defendant stated he shoved the bed in the corner of his bedroom so it basically only had one side that was open. The defendant stated when he would leave the room or house, he would take plastic totes and would slide them up against the side of the bed so J.L.C. couldn't see out. The defendant stated he then took some barbell weights and free weights in the room and would put them against the totes to make it more difficult for J.L.C. to get out. The defendant stated he did this also so he would know if J.L.C. tried to get out since the weights would be moved.

The defendant stated there were at least two occasions when he thought J.L.C. had tried to get out from under the bed and he had struck a wall and screamed a lot to the point where he knew she was scared and she knew that she better never try that again. The defendant stated J.L.C. was fearful of him enough that she knew that she was not to leave the bedroom without him. When he left the house, the defendant stated he would tell J.L.C. that she better not

leave and told her bad things would happen to her if she tried. The defendant stated she knew she shouldn't come out from under the bed when he was not there. The defendant stated that, because of his anger outbursts, J.L.C. complied and did as she was told.

At Christmas time, the defendant stated he left the house and went to Superior to visit one of his grandparents. The defendant estimated he was gone for twelve hours. The defendant stated he told J.L.C. that she had to hold it if she needed to go to the bathroom and was not allowed to exit from under the bed until he returned.

The defendant stated that, when his father would come to the house, which was typically on Saturdays, he would make J.L.C. go under the bed where he again would put the totes and the weights in front of it. The defendant stated he would turn up the radio in his room to cover up any noise that J.L.C. might make.

The defendant stated he initially kept the loaded shotgun near a door outside his room with the three remaining shells for protection in case the police came. The defendant stated after about two weeks, he removed the three shotgun shells and placed them in a drawer in an end table on the main floor of the house. The defendant stated he took the empty shotgun and placed it in the trunk of a white car that was broken down in the yard. The defendant indicated the shotgun would either be in the car, or, if his father had found it, would have been moved into the house. The defendant provided locations for where his brown colored steel toed work boots, black colored jacket, black mask, and jeans he was wearing were located. The defendant stated he was surprised that there wasn't any blood spatter that came back on him, and so he wasn't very worried about the clothing.

The defendant drew a diagram of the Closs home. On that map, he indicated where the highway was, where he parked, and his approach to the front steps of the Closs home. He included on the map that he drew his return to the car when he dragged J.L.C. from the house and where he had put her in the trunk. The defendant identified on his map where he remembers James was lying on the floor after the defendant shot him. The defendant identified where Denise was when he shot her in the bathtub. The defendant drew out a diagram of the floor plan of his house and indicated on the diagram the garbage can where he had put the license plate he stole before kidnapping J.L.C.

The defendant stated that, on the day he was arrested, he told J.L.C. he was leaving for a few hours. The defendant stated he went to Haugen. When he got home, the defendant stated he discovered J.L.C. was not under the bed. The defendant stated he briefly looked around the house and then saw her footprints outside. The defendant stated he then got into his car and started to drive around looking for her. The defendant stated that, after a few minutes, he returned to his house and was met by the police. The defendant stated it was at that point that he knew he was caught.

The defendant stated he basically assumed he had gotten away with killing James and Denise, and kidnapping J.L.C. since he hadn't been caught for the first two weeks. The defendant stated he had never met J.L.C. through any social media sites and only learned her name after the abduction and when he got back to his house. The defendant stated he learned the names of the two people he shot and killed after seeing their names reported on multiple news programs and social media. The defendant stated he never would have been caught if he would have planned everything perfectly.

Detective Nelson reports a search warrant was executed on January 11, 2019, at the defendant's residence located at 14166 S. Eau Claire Acres Circle, in the Town of Gordon, Douglas County, Wisconsin. Detective Nelson reports the search warrant was executed by a team from the Wisconsin Department of Justice/DCI and agents from the Wisconsin Department of Justice, State Crime Lab Field Response Team.

Detective Nelson reports that, throughout the course of the two-day search, a total of 89 pieces of evidence were recovered from the property. Among the items recovered are the following:

- Mossberg silver and black colored shotgun and three remaining shotgun shells
- Brown colored leather steel toed boots
- Black colored jacket
- Black colored mask
- Stolen license plate
- Glow in the dark colored T-handle trunk safety release lever

The statements made by the law enforcement officers can be considered truthful, credible, and reliable because of the positions of trust they hold. The statements of the citizen witnesses can be considered truthful, credible, and reliable because they are made by citizen witnesses. The statements of the defendant(s) can be considered truthful, credible, and reliable to the extent to which they are admissions against interests.

Subscribed and sworn to before me on 01/14/19

Electronically Signed By:

Brian H Wright

District Attorney

State Bar #: 1021130

Electronically Signed By:

Detective Jeffrey Nelson

Complainant