

STATE OF WISCONSIN

-VS-

Russell L Wilson
c/o Washburn County Jail
Shell Lake, WI 54871

Defendant,

Plaintiff,

DA Case No.: 2016WB000722
Assigned DA/ADA: Thomas H. Frost
Agency Case No.: RM16-02184
Court Case No.: 16 OF 125

FILED SUMMONS

NOV - 7 2016

THE STATE OF WISCONSIN TO SAID DEFENDANT:

Karen Nord
CLERK OF COURT
WASHBURN COUNTY
SHELL LAKE, WI 54871

A complaint, a copy of which is attached, having been made accusing the defendant of committing the crime(s) of:

THE CRIME(S) OF:

DATE OF VIOLATION:

CONTRARY TO WIS. STATUTE(S):

First Degree Intentional Homicide; Conspiracy to Commit

on and between September 13th, 2016 and October 3rd, 2016

940.01(1)(a); 939.31

First Degree Intentional Homicide; Solicitation of

on and between September 13th, 2016 and October 3rd, 2016

940.01(1)(a); 939.30

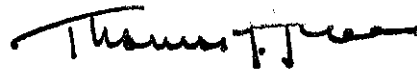
The original of such complaint has been filed in the office of the Clerk of Courts for Washburn County.

You, the defendant, are therefore summoned to appear before the Circuit Court – Criminal Division of Washburn County, at the Washburn County Courthouse, 10 Fourth Avenue, Shell Lake, WI 54871 in Room # on:

DATE/TIME: 11/14/2016 at 10:00 AM

And in case of your failure to appear, a warrant for your arrest may be issued.

Date: 11-7-16



Thomas H. Frost, District Attorney
State Bar No.: 1070451

Enc.

Date Mailed: _____

Please contact the State Public Defender's Office at 715-635-3770 to determine your eligibility for a Public Defender. If you do not qualify for a State Public Defender, you may petition the court for a court appointed attorney by contacting the Clerk of Court's Office at 715-468-4677.

STATE OF WISCONSIN, IN CIRCUIT COURT, WASHBURN COUNTY.
STATE OF WISCONSIN,

Plaintiff,

VS.

DA Case No. 2016WB000722
Assigned DA/ADA: Thomas H. Frost
Agency Case No: RM16-02184
Court Case No. 16 CF 125
ATN:

Russell L Wilson
c/o Washburn County Jail
Shell Lake, WI 54871
DOB: 11/29/1966
Sex/Race: M/W

Defendant.

FILED

NOV - 7 2016

Karen Nord
CLERK OF COURT
WASHBURN COUNTY
SHELL LAKE, WI 54871

CRIMINAL COMPLAINT

Jason Bartholomew, of the Washburn County Sheriff's Office, on information and belief, being first duly sworn, states as follows:

Count 1: CONSPIRACY TO COMMIT FIRST DEGREE INTENTIONAL HOMICIDE

The above-named defendant on and between September 13th, 2016 and October 3rd, 2016, in the City of Shell Lake, Washburn County, Wisconsin, conspired to cause the death of A [REDACTED] N B [REDACTED] and Margie L Strickland, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.31 Wis. Stats., a Class B Felony, and upon conviction may be sentenced to a term of imprisonment not to exceed sixty (60) years.

Count 2: SOLICITATION OF FIRST DEGREE INTENTIONAL HOMICIDE

The above-named defendant on and between September 13th, 2016 and October 3rd, 2016, in the City of Shell Lake, Washburn County, Wisconsin, advised another to cause the death of A [REDACTED] N B [REDACTED] and Margie L Strickland, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.30 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.

PROBABLE CAUSE:

Complainant, Jason Bartholomew, is an Investigator with the Washburn County Sheriff's office and in that capacity investigated the facts and circumstances of this offense by personal observation and participation, and by review of the reports of other law enforcement officials.

Complainant states that on September 13, 2016, he met with Timothy Wallace, an inmate at the Washburn County Jail, located in Shell Lake, Washburn County, Wisconsin. Wallace advised complainant that defendant Russell Wilson is his roommate at the jail. Wallace further advised that defendant and Wallace had a conversation in which defendant indicated he wanted Wallace to burn down the house of his victim with the victim inside. Complainant knows defendant was in custody at the jail for sexual intercourse with a child. Wallace said he told defendant he was getting out of jail soon and may be able to help defendant. Wallace said defendant discussed offering to give him two trucks and a tractor in payment. Wallace explained that defendant wanted his victim and ex-girlfriend to disappear and he wanted their residence burned. Wallace said Wilson asked that Wallace pour gasoline in front of the door of the residence and light it on fire. Wallace said that defendant brings this topic up with him on a daily basis.

On Sept 22, 2016, complainant and Agent Frederick met with Wallace. Wallace told them that he told the defendant that a guy they discussed could get the defendant out and would burn the house down. Wallace told them that during a discussion with the defendant he asked the defendant if he wanted Wallace to tell the hitman that the potential victim[s] should be gone by a certain court date. Wallace said that the defendant responded that it should be before the 10th. Complainant knows from the Washburn County Circuit Court records that defendant had a Final Pre-Trial Conference date of October 10, 2016. Wallace asked the defendant again if he wanted the places burned down and defendant responded in the affirmative.

On September 27, 2016, complainant had a further conversation with Wallace in which Wallace said defendant was still seeking to have his victim and ex-girlfriend, the victim's mother, killed.

On September 29, 2016, complainant and D.C.I. Agent Adam Frederick met with Wallace. They discussed Wallace using a code when referring to defendant's victim and her mother (defendant's ex-girlfriend). The victim and her mother would be referred to as stray cats.

Agent Frederick assumed the alias "Zip" for the purpose of acting in an undercover capacity and this name was made known to defendant. Defendant additionally confirmed that his victim's mother (his ex-girlfriend) now had a new boyfriend.

Agent Frederick had a telephone conversation with defendant on September 29, 2016. Defendant told Frederick that he had "kitties over there in the barn" and there were now three "kitties" in the barn. "Zip" asked defendant if he wanted all three cats taken care of and defendant responded that he did. Defendant said he wanted it done by "ten ten." October 10, 2016, which was the date of defendant's final court hearing before trial. Defendant and "Zip" agreed to a final price of \$6,000.


On October 3, 2016, Agent Frederick, posing as "Zip" received two telephone calls from defendant. During the course of the conversations they discussed a truck, previously

mentioned between them, as payment. Defendant said the truck was his dad's and he was trying to figure out how to get it to "Zip." The defendant agreed to call his dad and tell him "Zip" would be picking it up. Later defendant called his dad, described "Zip" and told him he trusted "Zip" and his dad agreed that it was the defendant's decision to allow "Zip" to use the truck. Later Agent Frederick, posing as "Zip" received a call from the defendant verifying he spoke with his dad and that he told him "Zip" would be picking up the truck. Subsequently, Agent Frederick went to defendant's father's address where the defendant's father gave Agent the keys to the truck.

Based on the foregoing, the complainant believes this Complaint to be true and correct.

Subscribed and sworn to before me
and approved for filing on:

Dated: 11-07-2016


Jason Bartholomew, Complainant


Thomas H. Frost, District Attorney
State Bar No: 1070451

