

State of Wisconsin

Circuit Court

Green Lake County

STATE OF WISCONSIN

Plaintiff,

-VS-

STEPHAN W ADDISON
22 2 410 GLENDALE TERR
MEDINAH, IL 60157
DOB: 08/18/1978
Sex/Race: M/W
Eye Color: Blue
Hair Color: Brown
Height: 6 ft 0 in
Weight: 185 lbs
Alias:

FILED

AUG 1 6 2005

SUSAN J. KRUEGER
Clerk of Circuit Court
GREEN LAKE COUNTY, WI

DA Case No.: 2005GL000834

Assigned DA/ADA: LISA

VANDENBRANDEN

Agency Case No.: 05GLSO2652

05GLSO2562

Court Case No.: 05-CF-90

ATN: 24000000117079

Defendant

Criminal Complaint

The undersigned being first duly sworn, deposes and says:

Your complainant, the Chief Deputy of the Green Lake County Sheriff's Department, has reviewed the official law enforcement agency reports prepared by the arresting officer, whom your complainant knows to be truthful and reliable, based on past professional contacts. Said reports have been prepared, filed and maintained in the normal and ordinary course of business of said law enforcement agency.

Count 1: FIRST DEGREE SEXUAL ASSAULT

The above-named defendant on or about Sunday, August 07, 2005, in the Town of Brooklyn, Green Lake County, Wisconsin, by use of force, did have sexual intercourse with [REDACTED] without that person's consent, and was aided or abetted by one or more persons, contrary to sec. 940.225(1)(c) Wis. Stats., a Class B Felony, and upon conviction may be sentenced a term of imprisonment not to exceed sixty (60) years.

Count 2: FIRST DEGREE SEXUAL ASSAULT

The above-named defendant on or about Sunday, August 07, 2005, in the Town of Brooklyn, Green Lake County, Wisconsin, by use of force, did have sexual intercourse with [REDACTED] without that person's consent, and was aided or abetted by one or more persons, contrary to sec. 940.225(1)(c) Wis. Stats., a Class B Felony, and upon conviction may be sentenced a term of imprisonment not to exceed sixty (60) years.

Count 3: FIRST DEGREE SEXUAL ASSAULT

The above-named defendant on or about Sunday, August 07, 2005, in the Town of Brooklyn, Green Lake County, Wisconsin, by use of force, did have sexual contact with

████ without that person's consent, and was aided or abetted by one or more persons, contrary to sec. 940.225(1)(c) Wis. Stats., a Class B Felony, and upon conviction may be sentenced a term of imprisonment not to exceed sixty (60) years.

Count 4: FOURTH DEGREE SEXUAL ASSAULT

The above-named defendant on or about Sunday, August 07, 2005, in the Town of Green Lake, Green Lake County, Wisconsin, did have sexual contact with █████ without that person's consent, contrary to sec. 940.225(3m) Wis. Stats., a Class A Misdemeanor, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

Count 5: FALSE IMPRISONMENT

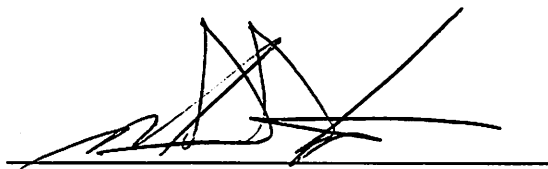
The above-named defendant on or about Sunday, August 07, 2005, in the Town of Brooklyn, Green Lake County, Wisconsin, did intentionally restrain █████ without that person's consent, and with the knowledge that he had no lawful authority to do so, contrary to sec. 940.30 Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

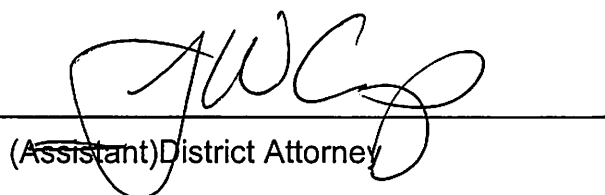
PROBABLE CAUSE: See law enforcement reports attached hereto and made a part hereof.

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:

This 15th day of August, 2005.


Complainant


(Assistant) District Attorney

STATEMENT OF PROBABLE CAUSE

Mark P. Putzke, being first duly sworn on oath deposes and says:

Your affiant is the Chief Deputy of the Green Lake County Sheriff's Department and in that capacity has been informed by the reports of the Green Lake County Sheriff's Department kept in the normal and ordinary course of business, which have proven to be reliable in the past of the following:

That the reports indicate August 7, 2005, Detective Chad Holdorf of the Green Lake County Sheriff's Department had occasion to speak with [REDACTED] who stated that during the evening hours of August 6, 2005 she went to a bar in the City of Ripon, Wisconsin. While there she drank a diet Pepsi and eventually met two males who began talking to her. Those two males were later identified as Benjamin C. Butler and Stephan W. Addison. When the bar was closing Addison and Butler approached [REDACTED] and during the conversation asked her where she was from. [REDACTED] stated she was from Berlin. Addison and Butler stated they were from Green Lake. Addison and Butler told [REDACTED] they were lawyers. They said they didn't have any keys to their friend's car and asked if [REDACTED] could give them a ride. Butler gave [REDACTED] a business card which Detective Holdorf has observed and is the business card for Benjamin C. Butler. [REDACTED] stated that she drove Butler and Addison out of Ripon on State Highway 23. Addison made the comment he could not find the house they were going to on their own. [REDACTED] stated that they kept driving for a while and Addison and Butler kept saying they should stop at a boat landing at Sunset Park. [REDACTED] told them no. Butler and Addison stated that they wanted to park with her to which [REDACTED] responded "I don't know what you are thinking, cuz it ain't happening with me tonight." [REDACTED] stated that they eventually came to Walker's bar and restaurant which she recognized was almost to the County Park. [REDACTED] stated that she needed to get home that she had responsibilities at which time Addison and Butler told her to pull into Walker's parking lot which she did. Once she pulled into Walker's parking lot, located in the Town of Green Lake, Green Lake County, Wisconsin Addison reached over and grabbed [REDACTED] crotch and [REDACTED] took his hand and pushed it away it forcefully but Addison resisted. [REDACTED] reports that both Addison and Butler were attempting to undress her and talking suggestively. [REDACTED] told them she would leave them both there or give them a ride to their house but they needed to stop what they were doing. [REDACTED] then asked which way she needed to go to get them home. [REDACTED] left Walker's. After they left Walker's Butler and Addison were saying that [REDACTED] had a beautiful pussy and they wanted to touch her pussy. [REDACTED] told them it wasn't going to happen. While [REDACTED] was driving Butler and Addison continued to try to touch her at which time [REDACTED] told them to back off. Once on Lakeview Road Addison and Butler told [REDACTED] that there were 10 guys at their house. [REDACTED] told them she would not drop them off at the house. [REDACTED] told them she would drop them off close so they could walk there. Addison and Butler told [REDACTED] to pull into the private boat landing which she did.

█████ reports that she stopped the car and put it in park with the lights on. Addison reached over and pulled out the keys. Butler reached up and held █████ shoulders while Addison got out of the car and went to the driver's side of the vehicle. █████ states that Butler held █████ in the seat as Addison pulled down his pants. Addison tried to force █████ to give him oral sex but she told him she wouldn't. Addison then reached down and ripped █████ belt off. Addison grabbed █████ pants and ripped them and a button flew off. Addison also grabbed █████ underwear and tore them. █████ states that she kept telling Butler and Addison to stop she resisted. Addison and Butler would not stop. █████ reports that Addison and Butler started pulling her hair at which time Butler came around and bit █████ right upper arm. █████ stated that at this time Addison stuck his face in her crotch. █████ was pushing Addison away and trying to keep Butler off of her. █████ told them they had to stop and she had to leave. Addison then pulled █████ out of the car at which time her pants which had been down around her ankles came off and were left in the car.

█████ states that once Butler and Addison got her out of the car the door was shut. Both Addison and Butler were trying to get █████ on the hood of the car. Addison had █████ pressed against the front fender and tried to have sex with her. Addison was telling Butler to get █████ on top of the car at which time Butler got on the hood of the car near the windshield. █████ kept telling them to stop, Butler pulled and Addison pushed █████ up on top of the hood. Addison stood on the side of the car and held █████ legs open while Butler was on the hood of the car holding █████ Addison put his penis inside █████ vagina. Addison was telling █████ to give Butler oral sex. █████ states that both Addison and Butler were encouraging each other and rooting each other on.

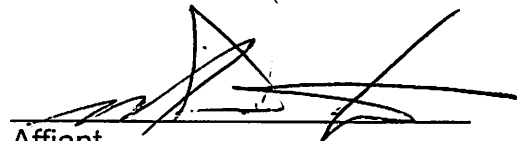
█████ reports that she was trying to work her way off of the car until she got her leg down in front of the car and stood up on the ground. █████ was trying to get back into the car when she saw her keys on the defroster outside by the windshield wipers. █████ got a hold of her keys at which time Addison grabbed her and pushed her up against the front fender turning her as he threw her against the car so she was facing away from him. Addison then put his penis in █████ anus. █████ stated that as Addison was having anal intercourse with her she worked her way back to the door of the car, grabbed the door handle, fell into the car and shut the door. █████ then drove off. At no time did █████ give Butler or Addison permission to restrain her or have sexual contact or intercourse with her.

The reports further indicate that on August 7, 2005 Detective Chad Holdorf of the Green Lake County Sheriff's Department had occasion to speak with Benjamin Butler who admitted that he and Stephan W. Addison left Burt's bar in Ripon with a girl that they took to a boat launch in Sunnyside Acres. Butler further admitted that both he and Addison were attorneys in Chicago.

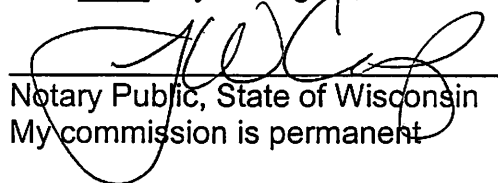
Your affiant is aware of the boat landing in Sunnyside acres and knows that to be in the Township of Brooklyn, Green Lake County, Wisconsin.

It is believed the statements of Chad Holdorf are accurate and reliable in that they are based upon his observations and experiences as a law enforcement officer. It is believed the statements of [REDACTED] are accurate and reliable in that they are made based upon her personal observations and experiences. It is believed the statements of BENJAMIN C BUTLER are accurate and reliable in that they are made contrary to his penal interest.

All of the above-foregoing criminal acts took place in Green Lake County, Wisconsin.


Affiant

Subscribed and sworn to before me
This 15th day of August, 2005.


Notary Public, State of Wisconsin
My commission is permanent