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STATE OF WISCONSIN	CIRCUIT COURT	CLARK COUNTY
STATE OF WISCONSIN	Plaintiff,	DA Case No.: 2021CL000311 Agency Case No.: 2020-14423 DA/ADA Assigned: Melissa Inlow Court Case No.: 2021CF
vs.	ATN:	
JESUS CONTRERAS PEREZ 155759 Locker Rd Mosinee, WI 54455 DOB: 01/31/1980 Sex/Race: M/H Alias: Also Known As Chewy Defendant.		CRIMINAL COMPLAINT

Your complainant, being first duly sworn, states that:

Count 1: FIRST DEGREE INTENTIONAL HOMICIDE - PTAC, AS A PARTY TO A CRIME, DOMESTIC ABUSE

The above-named defendant on or about Saturday, October 3, 2020, Clark County, Wisconsin, as a party to a crime, did cause the death of Cassandra Ayon, with intent to kill her, contrary to sec. 940.01(1)(a), 939.50(3)(a), 939.05, 968.075(1)(a) Wis. Stats., a Class A Felony, and upon conviction shall be sentenced to imprisonment for life.

And further, invoking the provisions of sec. 968.075(1)(a) Wis. Stats., because this charge is an act of domestic abuse, costs upon conviction would include the domestic abuse assessment imposed under sec. 973.055(1) Wis. Stats.

Count 2: HIDING A CORPSE - PTAC, AS A PARTY TO A CRIME

The above-named defendant on or about Saturday, October 3, 2020, Clark County, Wisconsin, as a party to a crime, did hide a corpse with the intent to conceal a crime, contrary to sec. 940.11(2), 939.50(3)(f), 939.05 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 3: STALKING RESULTING IN BODILY HARM, DOMESTIC ABUSE

The above-named defendant on or about between July 5, 2020 and October 3, 2020, Clark County, Wisconsin, did intentionally engage in a course of conduct directed at a specific person to wit: Cassandra Ayon that caused that person and that would cause a reasonable person under the same circumstances to suffer serious emotional distress or to fear bodily injury or death to themselves or to a member of their family or household and where the defendant knew or should have known that at least one of the acts that constituted the course of conduct caused Cassandra Ayon to suffer serious emotional distress or placed Cassandra Ayon in reasonable fear of bodily injury or death to themselves or a member of their family or household and where the defendant's acts caused Cassandra Ayon to suffer serious emotional distress or induced fear in Cassandra Ayon of bodily injury or death to themselves or a member of their family or household. The act resulted in bodily harm to the victim or a member of the victim's family or household., contrary to sec. 940.32(3)(a), 939.50(3)(f), 968.075(1)(a) 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.

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And further, invoking the provisions of sec. 968.075(1)(a) Wis. Stats., because this charge is an act of domestic abuse, costs upon conviction would include the domestic abuse assessment imposed under sec. 973.055(1) Wis. Stats.

PROBABLE CAUSE:

Your complainant reports that Cassandra Ayon (DOB: 9/1/1993), was last seen alive on October 3, 2020 at approximately 3:45 a.m. leaving a friend's home in Unity, Clark County, Wisconsin. Your complainant reports that the weather on October 2, 2020 and October 3, 2020 in the area was clear with no precipitation or hazardous conditions reported. Clark County Sheriff's Office Deputy Patrick Fehlman reports that on October 4, 2020 at approximately 3:00 p.m., he was contacted by Kirk Haslow, Ayon's stepfather, who stated that Ayon had not been seen since October 2, 2020. Rosa Haslow, Ayon's mother, stated that she had lunch with Ayon at home in Loyal, Clark County, Wisconsin, on October 2, 2020 at approximately 1:00 p.m. Mrs. Haslow stated that after lunch Ayon left for work at Marathon Cheese, located in Marathon City, Wisconsin, and she never saw or heard from Ayon again. Mrs. Haslow stated that she tried to call Ayon, but the calls go to voicemail. Mr. Haslow stated that one of Ayon's friends, (Witness 2) came to the house that morning (October 4, 2020) and asked for Ayon. Mr. Haslow stated that Witness 2 stated that he and another friend, Witness 3, were supposed to go shopping with Ayon on October 3, 2020, but Ayon never contacted them.

Mrs. Haslow stated that Ayon has a child, Child 1, age 7, with the defendant, Jesus Contreras Perez, and that Ayon had moved across the street from the Haslows approximately three weeks earlier after her most recent breakup with the defendant. Mrs. Haslow stated that Ayon takes Child 1 to the bus stop each morning for school. Mrs. Haslow stated that the defendant picks up Child 1 from school, as Ayon works late. The Haslows stated that Ayon has never disappeared before and that they have no idea where she could be. Mrs. Haslow stated that normally Ayon was in contact with her and Ayon's friends every day. Mrs. Haslow stated that the defendant and Ayon did not have any legal custody agreement regarding Child 1 and that this weekend (October 2-4, 2020) was the first weekend in the past three weeks when Child 1 had stayed with the defendant the entire weekend.

Clark County Sheriff's Office Investigator Joshua Niemi reports that on October 5, 2020 he spoke with Witness 1, who stated that on July 5, 2020, she was coming back from a walk with Ayon in the area of Oak Grove Avenue and Century Road in the Town of Beaver, Clark County, Wisconsin, when they observed a vehicle parked on the side of the road. Witness 1 stated that it was starting to get dark outside and that she and Ayon were both scared, as they did not recognize the vehicle. Witness 1 stated that as they got closer to the vehicle, the defendant got out of the vehicle. Witness 1 stated that the defendant asked them why they were there and what they were doing. Witness 1 stated that she and Ayon stated that they told the defendant they were just going for a walk. Witness 1 stated that she was scared because Ayon had previously told her that the defendant was stalking Ayon.

Witness 1 stated that she got out her phone and recorded the interaction. Witness 1 stated that the defendant raised his hand to Ayon, and she flinched, but that he did not hit her. Witness 1 stated that the defendant was trying to get Ayon to speak with him, but Ayon did not want to speak with him. Witness 1 stated that Ayon told the defendant to go back home, but he did not. Witness 1 stated that later that night, Child 1 went outside and came back inside to say that the defendant was outside and wanted to talk to Ayon. Witness 1 stated that Ayon eventually went outside and talked to the defendant for an hour.

Witness 1 stated that, prior to the July 5, 2020 interaction, Ayon had told her that the defendant had followed Ayon home and that Ayon had seen the defendant following her home to Loyal, Clark County, Wisconsin, driving past her residence, and parking down the road. Witness 1 stated that Ayon was more scared when her cell phone was stolen from Kwik Trip a few weeks earlier (September 19,

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2020). Your complainant reports that Ayon obtained a new cell phone shortly after this phone was stolen.

Witness 1 stated that when she would visit Ayon at her residence in Loyal, Ayon would always look out her windows at the sound of any vehicle passing by. Witness 1 stated that the defendant's Facebook account was active on October 3, 2020, but deactivated on October 4, 2020.

Deputy Fehlman spoke with Witness 2 on October 4, 2020. Witness 2 stated that he last saw Ayon at approximately 1:30-2:00 a.m. when she left his cousin's house in Marshfield with Witness 3. Witness 2 stated that Ayon was driving her black Impala and only drank one beer at the house.

Investigator Niemi spoke with Witness 2 on October 6, 2020. Witness 2 stated that he had started hanging out with Ayon more frequently approximately one year earlier after she broke up with the defendant. Witness 2 stated that Ayon stated that she broke up with the defendant because he was abusive to her and also because he was cheating on her. Witness 2 stated that in August 2020, Ayon showed him bruises on her wrist and arm from the defendant. Witness 2 stated that Ayon told him that she had been in a car with the defendant when the defendant became angry about Ayon hanging out with Witness 2 and other men at a bar while they were broken up. Witness 2 stated that Ayon told him the defendant "freaked out" and told her that if he ever heard that she was hanging out with these men again, he would hurt her. Witness 2 stated that Ayon told him that she tried to get out of the vehicle and the defendant grabbed her by the arm and wrist to prevent her from leaving, causing the bruises that Witness 2 saw. Witness 2 stated that Ayon told him that the defendant told her that he would drive the car full speed, crash, and they would both die before he would let her leave the vehicle.

Witness 2 stated that in June 2020, he and Ayon had been at a bar in Wausau and he dropped Ayon off at home afterwards. Witness 2 stated that Ayon told him the next day that the defendant had been waiting at her home in Loyal, Clark County, Wisconsin, when Witness 2 dropped her off. Witness 2 stated that the defendant showed up with a knife and stated, "You and your fucking boyfriends. They are probably all running a train on you. If I ever see them around you, they are going to get hurt and so are you."

Witness 2 stated that he last saw Ayon at a friend's house in Marshfield, Wisconsin, at approximately 2:00 a.m. on Saturday, October 3, 2020. Witness 2 stated that Ayon came over after work with another friend (Witness 3) and that Ayon stated that the defendant had followed her from work that night and thought she saw him when she picked up Witness 3 in Unity, Wisconsin. Witness 2 stated that Ayon appeared "nervous," and continually looked out the window while she was with them that night.

Witness 2 stated that before Ayon left on October 3, 2020, she told Witness 2 to get some sleep so they (Witness 2, Witness 3, and Ayon) could go shopping later that day in Eau Claire. Witness 2 stated that Ayon stated that she was going to go home and get some rest as well. Witness 2 stated that Ayon told him she would be at his parents' house around noon on October 3rd and would wake him up even if he was sleeping so they could go shopping. Witness 2 stated that at first when he did not hear from Ayon, he thought she did not want to go, so he stayed home. Witness 2 stated that he called Ayon around 5:30 p.m. on October 3, 2020, and her phone went straight to voicemail. Witness 2 stated that he found this odd and thought maybe she did not want to hang out with anyone. Witness 2 stated that he tried calling Ayon's phone a second time between 6:00 and 6:30 p.m. and it again went straight to voicemail. Witness 2 showed Investigator Niemi his phone, and Investigator Niemi observed Witness 2's attempts to contact Ayon, including his Snapchat to her on October 3, 2020 that was not opened.

Clark County Sheriff's Office Detective Aaron Ruggles reports that he spoke with Witness 3 on October 4, 2020. Witness 3 stated that Ayon picked him up after she got off work on October 2, 2020 at approximately 11:08 p.m. Witness 3 stated that Ayon stated that the defendant had been following her from work to Witness 3's house, located in Unity, Clark County, Wisconsin. Witness 3 stated that Ayon turned off all the lights at Witness 3's house when she arrived. Witness 3 stated that Ayon was looking

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out the window the whole time they were at their friend's house in Marshfield later that night. Witness 3 stated that Ayon told him that the defendant only stalks her on Fridays and Saturdays. Witness 3 stated that approximately two weeks earlier, Ayon had sent him photos of her with bruising around her eye that Ayon stated was caused by the defendant. Det. Ruggles reports that Witness 3 stated that a few weeks earlier, Ayon stated that she had gone to Kwik Trip and the defendant stole her cell phone out of her car. Witness 3 stated that Ayon told him that if anything happens to her, it was the defendant.

Witness 3 stated that on October 3, 2020, Ayon drove the two of them from his friend's house in Marshfield to Witness 3's home in Unity, where they arrived around 2:45 – 3:00 a.m. Witness 3 stated that Ayon left his home at approximately 3:45-4:00 a.m. on October 3, 2020. Witness 3 stated that he watched Ayon get into her car and drive away. Witness 3 stated that he has not seen or spoken to Ayon since she left his home that morning. Detective Ruggles reports that after he spoke with Witness 3, he drove the route from Witness 3's home to Ayon's home and did not observe any potential crash evidence or anything of note. Upon arrival at the Haslow residence, Det. Ruggles reports that Mr. Haslow stated that Child 1 was dropped off at approximately 7:50 p.m. at the end of the Haslows' driveway and the defendant's teenage daughter walked Child 1 to the house. Mrs. Haslow stated that the defendant always brings Child 1 to the door and talks to the Haslows, but did not do so that evening. Neither Mr. nor Mrs. Haslow saw the defendant that night.

Clark County Sheriff's Office Detective Scott Klueckmann reports that on October 6, 2020 he spoke with Witness 4. Witness 4 stated that on September 18, 2020 at approximately 11:40 p.m., he and Ayon had their cell phones stolen out of Ayon's car in the parking lot of Kwik Trip, located in Abbotsford, Marathon County, Wisconsin. Witness 4 stated that whoever stole his phone used it to post photos to Witness 4's Facebook page. Witness 4 stated that Ayon later told him that the defendant stole their phones that day.

Clark County Sheriff's Detective Noah Lobner reports that he reviewed the defendant's Google Dashboard results and observed searches on July 7, 2020 for Witness 4's license plate number and searches for: "ccap clark county wi," "how to check licence [sic] plates address," and "how to get address from license plate." Websites visited on that day from the defendant's phone were: Can I find someone's address from their license plate? - Quora, License plate search - Wisconsin DMV Official Government Site, Wisconsin Court System, and <http://co.clark.wi.us/>. On September 22, 2020, the defendant searched for Witness 4 by name. Later that day, the defendant searched for Witness 4's name on the Wisconsin Circuit Court Access website.

Detective Lobner reports that Criminal Analyst Courtney Ripp of the Wisconsin Department of Justice – Division of Criminal Investigation – Wisconsin Statewide Intelligence Center (WSIC) compiled an animated map showing the movement of the defendant's cellular telephone on September 18 and 19, 2020. Detective Lobner reports that the map shows cellular telephone towers that the defendant's phone number utilized during that timeframe. Abbotsford Police Department Officer Eric English contacted the defendant via phone on September 19, 2020. The defendant stated that he had been helping a family member fix their car on September 18, 2020. The defendant stated that he went to bed for the night around 12:00 a.m. on September 19, 2020.

Detective Lobner reports that the animated map begins on September 18, 2020 at approximately 4:02 p.m. The first tower location for the defendant's phone was south of the defendant's address (155750 Locker Rd in Mosinee, Wisconsin) at 4:11 p.m. The phone then moves west while utilizing towers along STH 153 and ends up by Spencer, Wisconsin at 5:07 p.m. At 5:32 p.m., the phone again utilizes the tower by Spencer and then moves east back towards the defendant's residence. From 6:13 p.m., until 9:07 p.m., his phone only used the tower south of his residence. At 9:22 p.m., his phone moves north towards Mosinee then west along STH 153. It appears the phone moves north (possibly along STH 107) and then utilizes a tower near Marathon City at 10:28 p.m. At 11:41 p.m., the defendant's phone utilizes a tower near STH 13 and STH 29 in Abbotsford, Wisconsin. At 12:51 a.m. on September 19, 2020, the defendant's phone is utilizing the same tower in Abbotsford.

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The next timestamp is at 2:25 a.m. and the phone is still on the Abbotsford tower. At 3:39 a.m., the defendant's phone begins to move east (possibly along STH 29) as it utilizes a tower south of STH 29 near STH 97 at 3:46 a.m. The defendant's phone then moves south (possibly along STH 107) and ends up using the tower south of his residence at 4:06 a.m.

Ripp compiled another map containing the movement for the defendant's phone and Ayon's Google Dashboard locations. The map started out with Ayon near the intersection of STH 13 and STH 153 at 1:00 p.m. on September 18, 2020. Ayon's phone moves east along STH 153 and arrives near Marathon City at 1:31 p.m. Ayon's device stays in the same area until approximately 10:30 p.m. Victim 1's phone then moves south along STH 107 and west on STH 153. Ayon's phone utilized a tower near Halder, Wisconsin around the same time the defendant's phone utilized the same tower. Ayon's phone continues west and then goes north along STH 13. At 11:41 p.m. both Ayon's and the defendant's devices utilize a tower near Abbotsford, which would encompass the Abbotsford Kwik Trip. Ayon's device remains near the Abbotsford Kwik Trip until 11:58 p.m., and then has no communication again until 12:29 a.m. on September 19, 2020. At that time, her phone is still using the tower near Kwik Trip. The next timestamp for Ayon's phone is at 12:41 a.m. and it is on the same tower by Kwik Trip. That was the last timestamp for Ayon's phone.

Detective Klueckmann reports that on October 5, 2020 at approximately 2:27 p.m., he went to talk to the defendant at Johnson Creek Dairy in Mosinee, Wisconsin. Detective Klueckmann reports that he spoke with the owner, Kim Javorek, who stated that the defendant has worked there for 18 years doing most of the veterinary work for the cows. Javorek stated that the defendant had driven into town at noon to run errands and was expected back at 2:00 p.m. Javorek stated that Ayon had lived with the defendant on the farm, but had moved out approximately three weeks earlier. Javorek provided a phone number for the defendant that ended with "0203." Javorek stated that she would have the defendant call law enforcement. Javorek stated that the defendant typically works seven days a week, starting at 7:00 a.m., due to the nature of farm work.

Detective Klueckmann reports that on October 6, 2020 at approximately 7:47 a.m., Javorek called him to say that the defendant had never come home and that that was unusual for him. Detective Klueckmann returned to the farm to talk to Javorek at approximately 1:20 p.m. Javorek stated that the defendant had picked up his paycheck on October 5, 2020 at approximately 11:00 a.m. and left for town, saying he would be back at 2:00 p.m. Javorek stated that the defendant's brother provided a new phone number for the defendant with the last four digits, "8112." Detective Klueckmann reports that while he was talking to Javorek, the defendant called her from the "8112" number. Javorek told the defendant she wanted him to come back to the farm to talk to the police. The phone call then went dead. Javorek stated that the defendant told her that he was scared. Javorek called the defendant back at the same phone number and confirmed that she would meet the defendant at the farm. Detective Klueckmann reports that he heard Javorek say that the defendant would be back at the farm in about two hours.

Detective Klueckmann reports that on October 6, 2020 at approximately 8:48 a.m. he was at a briefing at the Sheriff's Office when dispatch advised that the defendant was on the phone. Detective Klueckmann reports that he spoke with the defendant, who identified himself, and stated that he wanted to talk with detectives. The defendant stated that he would come in that night at approximately 9:00 p.m. to answer their questions. The defendant stated that he was scared because he and Ayon had arguments but that he would never do anything to her. The defendant stated that he thought he started work around 6:45 a.m. on October 3, 2020, but he would have to check his timecard. Detective Ruggles reports that the defendant's timecard shows him clocking in at 7:24 a.m. on October 3, 2020. Detective Ruggles reports that the defendant's timecard shows him clocking out at 6:45 p.m. on October 2, 2020, but that is handwritten, not machine-punched.

Detective Klueckmann reports that location records from the cell phone that the defendant used to call him showed that the defendant was in Minnesota and Iowa. Detective Klueckmann reports

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that law enforcement stopped the defendant on October 6, 2020 on his way back to the farm in Mosinee, Wisconsin. Detective Klueckmann reports that the defendant was driving a maroon Ford Explorer SUV when he was stopped. The defendant stated that his friend sold him the SUV, but that he did not have the title and the vehicle was still in his friend's name. The defendant stated, "It make me look bad just taking off like that." The defendant stated that he had worked at the farm in Mosinee for 18 years.

Detective Klueckmann reports that on October 16, 2020, he responded to Witness 3's trailer park in Unity, Wisconsin, and spoke with Witness 5, who stated that her daughter, Witness 6, had observed a suspicious vehicle parked near their trailer on October 3, 2020 at approximately 3:00 a.m. Witness 6 stated that she woke up and looked out her bedroom window, which faces the north toward the entrance of the trailer court. Witness 6 stated that she saw a red SUV park, someone got out, and they walked southbound into the trailer court through the north entrance/exit road. Witness 6 stated that the person looked like a female, but she could not be certain. Witness 6 stated that she looked out the east window a few minutes later and she no longer saw this person. Detective Klueckmann reports that he personally observed that the place where the SUV was parked would not have been visible from Witness 3's trailer.

Detective Klueckmann followed up with Witness 6 on November 13, 2020. Detective Klueckmann showed Witness 6 photos of the maroon Ford Explorer SUV the defendant had been operating on October 6, 2020. Witness 6 looked at the photos and stated, "It kinda looks like it." Witness 6 stated, "It was dark, but that pretty much looks like it did outside." Witness 6 stated that the shape and color of the vehicle looked very familiar to her from the vehicle she saw that night. Witness 6 stated that she was not sure if a male or female got out of the vehicle, but that the person was "skinny."

Clark County Sheriff's Detective Steve Struensee reports that he went to Marathon Cheese on October 5, 2020 to obtain surveillance footage of Ayon leaving work on October 2, 2020. Detective Struensee reports that he spoke with human resources manager, David Larsen, who stated that Ayon had an excellent attendance record and never missed work. Larsen stated that Ayon was scheduled to work that day at 2:00 p.m., had not shown up, and had not called. Mr. Haslow stated on October 5, 2020 that Ayon loved her job at Marathon Cheese and that when Mrs. Haslow suggested that Ayon get a job closer to home, Ayon stated that she did not want to, as she liked her job. On October 8, 2020, Detective Struensee reports that Larsen stated that Ayon received her paycheck by direct deposit to BMO Harris and provided the routing number. Detective Ruggles reports that Mrs. Haslow stated on October 7, 2020 that Ayon has a debit card with BMO Harris and gets her paychecks deposited into that account. Mrs. Haslow was not aware of any other accounts that Ayon used.

Detective Struensee reports that he spoke with Ayon's coworkers at Marathon Cheese. One coworker, Witness 7, stated that she had been friends with Ayon for approximately two years since Ayon started working at Marathon Cheese. Witness 7 stated that Ayon told her about the problems she was having with the defendant. Witness 7 stated that Ayon told her within the past two weeks that the defendant had told Ayon that if she ever cheated on him, he knew where to hide Ayon's body so that no one would ever find it. Witness 7 stated that Ayon told her that she was dating someone, and they stopped at a gas station and the defendant stole their cell phones while they were inside. Witness 7 stated that she texted Ayon on October 3, 2020 and October 4, 2020 and did not get a response.

Clark County Sheriff's Deputy Jason King reports that he viewed surveillance footage provided by Marathon Cheese from October 2, 2020. Deputy King reports that the footage shows at 5:41:55 p.m., the red Ford SUV that the defendant is later seen driving at Kwik Trip in Mosinee on October 3, 2002 at 2:26:58 a.m., pulls onto Webster Street from 4th Street. The red SUV pulls into the Marathon Cheese parking lot at 5:42:40 p.m. The red SUVs lights go off at 5:42:47 p.m. At 5:42:53, Ayon's vehicle parking lights activate and flash twice. At 5:43:29 PM, the defendant's driver's side door opens. Deputy King reports that a head emerges from the driver's side door at 5:43:32 p.m. At 5:43:34 p.m., the front passenger side door of Ayon's vehicle opens. At 5:43:35 p.m., the head disappears. At

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5:46:55 p.m., the rear passenger side door opens. A head emerges and the rear passenger door closes at 5:46:58 p.m.

Deputy King reports that the defendant's front driver's side door opens at 5:47:00 p.m. and closes at 5:47:02 p.m. The defendant's vehicle begins to move at 5:47:12 p.m. The defendant's vehicle circles the parking row and exits the parking lot at 5:47:34 p.m. The defendant's vehicle leaves the camera view traveling on 3rd Street to Webster Street, then onto 4th Street. It was the same route he drove into the parking lot.

Deputy King reports that on Marathon Cheese surveillance at 9:08:33 p.m., he observed a male wearing clothing similar to what the defendant is wearing later in the Kwik Trip video in Mosinee, Wisconsin. The male subject is seen walking from the corner of Chestnut Street and 3rd Street behind a blue vehicle in the upper left of the video screen. The male subject walks on a sidewalk along 3rd Street towards Marathon Cheese and then cuts into the parking lot. The male subject walks across East Street into the parking lot adjoining the production plant. At 9:10:22 p.m., the male subject stops and turns around. The male subject appeared to be looking around where Ayon's car was parked earlier that evening, and then looks at a cell phone. The male subject walks across East Street through the east employee parking lot. The male subject walks through the middle of the parking stalls to the east towards Chestnut Street. The male subject starts walking toward 2nd Street then cuts back towards 3rd Street, walking in the roadway of Chestnut Street. The male subject walks through a driveway at the corner of Chestnut Street and 3rd Street at 9:12:13. Deputy King did not observe the male again on Marathon Cheese surveillance footage.

Detective Lobner reports that Verizon cell tower information shows the defendant's phone showed three data sessions on October 2, 2020 at 6:58 p.m., 7:02 p.m., and 7:05 p.m. All three data sessions used the Verizon cell tower located in Marathon City, Marathon County Wisconsin.

Deputy King reports that at 10:21:12 p.m., Ayon is seen walking out of work towards her vehicle and the lights come on her vehicle. Ayon enters her vehicle at 10:21:34 p.m. Ayon's vehicle exits the parking lot onto East Street towards 3rd Street. Ayon's vehicle turns onto 3rd Street and continues westbound until the video stops at 10:23:20 p.m.

Deputy King reports that he watched surveillance video provided by Kwik Trip, located at 301 Elderberry Road in Abbotsford, Wisconsin from October 2, 2020. Deputy King reports that Ayon's vehicle arrives at 11:18:10 p.m. and Ayon gets gas from the pump. Witness 3 walks into Kwik Trip at 11:19:27 p.m. Ayon walks into Kwik Trip at 11:21:37 p.m. Both Ayon and Witness 3 exit Kwik Trip at 11:31:47 p.m. Ayon's vehicle exits the Kwik Trip parking lot at 11:34:34 p.m., traveling towards STH 13.

Clark County Sheriff's Office Detective Noah Lobner reports that he reviewed Google Dashboard records from Ayon's cell phone on October 2, 2020 – October 3, 2020, which showed the following:

October 2, 2020:

11:51 a.m.:	At home in Loyal, Clark County, Wisconsin.
12:02 p.m.:	At or near 222 N. Main Street in Loyal.
12:26 p.m.:	At the Haslows' home in Loyal.
1:22 p.m.:	On STH 153 near west side of Stratford city limits.
1:23 p.m. - 6:52 p.m.:	No activity.
6:53 p.m. - 6:57 p.m.:	At work at Marathon Cheese.
6:58 p.m. - 10:35 p.m.:	No activity.
10:36 p.m.:	On STH 107 north of West Burma Road
10:52 p.m.:	On STH 153 west of North Galvin Ave.
10:54 p.m.:	Still at STH 153 west of North Galvin Ave. (Exact location at 10:52 p.m.)
11:07 p.m.:	At Witness 3's home (Unity, Clark County, Wisconsin).

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11:22 p.m.: At Abbotsford Kwik Trip (verified via video from Kwik Trip).

11:53 p.m.: Ayon's location begins to record approximately every 15 seconds. The starting point is on STH 13 (S. Pacific St) at E. Apple St in Spencer WI. (Information was obtained by law enforcement that she used Google Maps to get to the party in Marshfield.)

October 3, 2020:

12:00 a.m.: Ayon's phone moves south on STH 13, enters Marshfield, and remains on STH 13 (W. Veteran's Parkway)

12:06 a.m.: Turns south on South Central Ave and then moves east on East 4th Street.

12:08 a.m.: South on South Peach Ave.

12:11 a.m.: Arrives at Marshfield (location of the party).

12:16 a.m. Last location given in Marshfield (still at same house).

12:17 a.m. - 3:50 a.m.: No activity

3:51 a.m.: Last location provided. Witness 3's home (Unity, Clark County, Wisconsin.)

Detective Lobner reports that on November 9, 2020, he was able to review location data from a Geofence warrant covering various locations on October 2, 2020 and October 3, 2020. Detective Lobner reports that Ayon's phone arrived at Witness 3's house (Target Location 1) at 3:15 a.m. on October 3, 2020 and remained there until 3:55 a.m. At 4:06 a.m., Ayon's device is near the intersection of Century Rd and Fairhaven Ave (Target Location 4.) Ayon's device then moved north and was near the intersection of STH 13 and Yellowstone Trail (Target Location 3) at 4:10 a.m. From 4:12 a.m. through 4:26 a.m., there were six locations provided for Ayon's device. All of the locations utilized the same latitude and longitude of 44.8474239 and -90.317529. That location was at the north end of the trailer court in Unity, WI. (Target Location I.)

Detective Lobner reports that location data information provided by Cellcom showed that the defendant's phone had multiple data sessions on three different Verizon cell towers from 10:55 p.m. on October 2, 2020 through 12:41 a.m. on October 3, 2020. Detective Lobner reports that those towers are located in Abbotsford, Greenwood, and Spencer. All three towers surrounded an area which included Ayon's residence in Loyal and Witness 3's residence in Unity. Detective Lobner reports that the defendant's phone called Ayon's phone on October 3, 2020 at 12:01 a.m., but Ayon did not answer. Witness 3 recalled Ayon getting a call at that time from the defendant and that Ayon did not answer.

Detective Klueckmann reports that on October 19, 2020, Kim Javorek contacted him to report that her Cellcom representative had contacted her to say that the defendant went to the store on October 3, 2020 to report his work-provided cell phone lost and obtain a new one. Javorek stated that it was "unheard of" for an employee to make an insurance claim on a lost or damaged company cellphone on their own without going through Javorek. Javorek stated that the proper procedure is for the employee to report a lost or damaged cell phone to her or her husband and they make the insurance claim with Cellcom. Javorek stated that the defendant had left the farm from approximately 9:30 – 10:30 a.m. on October 3, 2020, but had not told Javorek where he was going.

Detective Klueckmann reports that he spoke with Cellcom store manager Allison Wayda on October 19, 2020. Wayda showed Detective Klueckmann store surveillance footage of the defendant arriving at 9:57 a.m. on October 3, 2020. Wayda stated that the defendant filed a Handset Protection Plan claim for a lost Galaxy GS-10 cell phone. Detective Klueckmann reports that he observed the defendant on surveillance video picking up his new cell phone and leaving the parking lot at 10:08 a.m. in a gold Saturn.

Detective Klueckmann reports that on October 8, 2020, he spoke with Witness 8, who stated that she cuts Child 1's hair every other week. Witness 8 stated that she had never cut the defendant's hair until he came in on September 27, 2020. Witness 8 stated that she thought it was odd that the defendant wanted his hair cut, as he did not have much hair and had never had her cut it before that date. Witness 8 stated that she made small talk with the defendant and the defendant asked her if she

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knew Ayon. Witness 8 stated that she did not know Ayon. Witness 8 stated that the defendant told her that he and Ayon split up and, "that bitch won't let me see him [Child 1]." Witness 8 stated that the defendant stated that he hoped Ayon did not think she was going to take Child 1 away from him. Witness 8 stated that the defendant mentioned having immigration problems and he was going into a lot of detail, which was unusual for him. Witness 8 stated that normally the defendant sits quietly while she cuts Child 1's hair. Witness 8 stated that it felt like the defendant just wanted to vent to her and that some of the defendant's comments were alarming to her, as was his demeanor, which Witness 8 described as "angry." Witness 8 stated that the defendant made comments about how Ayon would never keep him from Child 1.

Detective Lobner reports that on September 26, 2020 and 27, 2020, the defendant's Google Dashboard showed that videos related to firearm silencers were watched. Specifically: "how to make a home made silencer," "What a Silencer really Sounds Like," "Building a Fuel Filter Suppressor," "Testing a new Silencer (.22 LR - PVC Pipe)," and "Home made suppressor demo for .30-06."

Detective Lobner reports that the last activity attributable to Ayon on Ayon's Facebook account was at 3:19 a.m. on October 3, 2020 when she replied, "haha" to a friend's post. Detective Lobner reports that logins on October 8, 2020 and October 9, 2020 were confirmed to be Ayon's family logging in from a device on which Ayon had saved her Facebook password. There has been no activity attributable to Ayon since October 3, 2020 and messages sent to her have not been "read." Detective Lobner reports that no one has logged on to Ayon's Instagram account since September 23, 2020. Detective Lobner reports that the last activity on Ayon's Snapchat account was a message she sent on October 3, 2020 at 12:50 a.m. Detective Lobner reports that he accidentally sent a message from Ayon's account on October 12, 2020 when he was looking at Ayon's tablet.

Detective Ruggles reports that on December 8, 2020, Ayon's bank, BMO Harris, provided records showing that the last activity on Ayon's account was on October 5, 2020, which was when Ayon's October 3, 2020 Kwik Trip purchases posted. Detective Ruggles reports no bank activity after October 3, 2020, other than an automatic debit for her cell phone bill on October 5, 2020.

Special Agent Adam Frederick of the Wisconsin Division of Criminal Investigation reports that United States Immigration and Customs Enforcement Deportation Officer, Criminal Alien Program, Anthony Mintz reports there are no records indicating Ayon ever crossed the border, and no records exist indicating she had a passport. Special Agent Frederick reports that there has been no activity with Ayon's social security number in 2021.

Special Agent Frederick reports that Ayon's information and familial DNA have been entered into NamUS, the National Missing and Unidentified Persons System, and, as of the filing of this complaint, her body has not been located.

Your complainant reports that, despite significant law enforcement efforts, as of the date of this complaint, neither Ayon's body nor the vehicle she was driving on October 3, 2020 have been located.

Your complainant is a Detective with the Clark County Sheriff's Office, who bases his knowledge of this complaint on:

- the official law enforcement agency reports of the Clark County Sheriff's Office, the Wisconsin Division of Criminal Investigation, and the Federal Bureau of Investigation; which reports were prepared in the normal course of law enforcement duties;
- statements by citizen informant(s), who are eyewitnesses to the facts they relate;
- statements by the defendant, which were made contrary to his penal interests;

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- the official records of the Circuit Court for Clark County, the Department of Transportation, the FBI Triple I Teletype, and the Wisconsin Circuit Court Automated Program; which records are maintained in the normal course of business duties.

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

Subscribed and sworn to before me on 06/07/21

Electronically Signed By:

Melissa Inlow

District Attorney

State Bar #: 1057082

Electronically Signed By:

Scott Klueckmann

Complainant