

STATE OF WISCONSIN,

Plaintiff,

v.

Case No. _____

CHAI SOUA VANG,
DOB 09/24/68 A/M,
810 4TH STREET,
ST. PAUL, MN 55106,

Defendant.

CRIMINAL COMPLAINT

Your complainant, Gary Gillis, being first duly sworn on oath, deposes and says as follows:

**COUNT 1: FIRST-DEGREE INTENTIONAL HOMICIDE,
USE OF A DANGEROUS WEAPON**

On or about November 21, 2004, in the Township of Meteor, County of Sawyer, State of Wisconsin, the above-named defendant, did cause the death of Dennis Drew, with intent to kill that person, by use of a dangerous weapon, to wit: a rifle, contrary to Wis. Stat. §§ 940.01(1)(a) and 939.63(1)(b), a **Class A Felony**, and upon conviction shall be sentenced to imprisonment for life.

And further, invoking the provisions of § 939.63(1)(b), because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the underlying crime may be increased by not more than five (5) years.

**COUNT 2: FIRST-DEGREE INTENTIONAL HOMICIDE,
USE OF A DANGEROUS WEAPON**

On or about November 21, 2004, in the Township of Meteor, County of Sawyer, State of Wisconsin, the above-named defendant, did cause the death of Mark Roidt, with intent to kill that person, by use of a dangerous weapon, to wit: a rifle, contrary to §§ 940.01(1)(a) and 939.63(1)(b), a **Class A Felony**, and upon conviction shall be sentenced to imprisonment for life.

And further, invoking the provisions of § 939.63(1)(b), because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the underlying crime may be increased by not more than five (5) years.

**COUNT 3: FIRST-DEGREE INTENTIONAL HOMICIDE,
USE OF A DANGEROUS WEAPON**

On or about November 21, 2004, in the Township of Meteor, County of Sawyer, State of Wisconsin, the above-named defendant, did cause the death of Robert Crotteau, with intent to kill that person, by use of a dangerous weapon, to wit: a rifle, contrary to §§ 940.01(1)(a) and 939.63(1)(b), a **Class A Felony**, and upon conviction shall be sentenced to imprisonment for life.

And further, invoking the provisions of § 939.63(1)(b), because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the underlying crime may be increased by not more than five (5) years.

**COUNT 4: FIRST-DEGREE INTENTIONAL HOMICIDE,
USE OF A DANGEROUS WEAPON**

On or about November 21, 2004, in the Township of Meteor, County of Sawyer, State of Wisconsin, the above-named defendant, did cause the death of Joe Crotteau, with intent to kill that person, by use of a dangerous weapon, to wit: a rifle, contrary to §§ 940.01(1)(a) and 939.63(1)(b), a **Class A Felony**, and upon conviction shall be sentenced to imprisonment for life.

And further, invoking the provisions of § 939.63(1)(b), because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the underlying crime may be increased by not more than five (5) years.

**COUNT 5: FIRST-DEGREE INTENTIONAL HOMICIDE,
USE OF A DANGEROUS WEAPON**

On or about November 21, 2004, in the Township of Meteor, County of Sawyer, State of Wisconsin, the above-named defendant did cause the death of Allan Laski, with intent to kill that person, by use of a dangerous weapon, to wit: a rifle, contrary to §§ 940.01(1)(a) and 939.63(1)(b), a **Class A Felony**, and upon conviction shall be sentenced to imprisonment for life.

And further, invoking the provisions of § 939.63(1)(b), because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the underlying crime may be increased by not more than five (5) years.

**COUNT 6: FIRST-DEGREE INTENTIONAL HOMICIDE,
USE OF A DANGEROUS WEAPON**

On or about November 21, 2004, in the Township of Meteor, County of Sawyer, State of Wisconsin, the above-named defendant, did cause the death of Jessica Willers, with intent to kill that person, by use of a dangerous weapon, to wit: a rifle, contrary to §§ 940.01(1)(a) and 939.63(1)(b), a **Class A Felony**, and upon conviction shall be sentenced to imprisonment for life.

And further, invoking the provisions of § 939.63(1)(b), because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the underlying crime may be increased by not more than five (5) years.

**COUNT 7: ATTEMPTED FIRST-DEGREE INTENTIONAL HOMICIDE,
USE OF A DANGEROUS WEAPON**

On or about November 21, 2004, in the Township of Meteor, County of Sawyer, State of Wisconsin, the above-named defendant, attempted to cause the death of Lauren Hesebeck, with intent to kill that person, by use of a dangerous weapon, to wit; a rifle, contrary to §§ 940.01(1)(a), 939.32 and 939.63(1)(b), a **Class B Felony**, and upon conviction may be sentenced to a term of imprisonment not to exceed sixty (60) years.

And further, invoking the provisions of § 939.63(1)(b), because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the underlying crime may be increased by not more than five (5) years.

**COUNT 8: ATTEMPTED FIRST-DEGREE INTENTIONAL HOMICIDE,
USE OF A DANGEROUS WEAPON**

On or about November 21, 2004, in the Township of Meteor, County of Sawyer, State of Wisconsin, the above-named defendant, attempted to cause the death of Terry Willers, with intent to kill that person, by use of a dangerous weapon, to wit; a rifle, contrary to §§ 940.01(1)(a), 939.32 and 939.63(1)(b), a **Class B Felony**, and upon conviction may be sentenced to a term of imprisonment not to exceed sixty (60) years.

And further, invoking the provisions of § 939.63(1)(b), because the defendant committed this offense while using a dangerous weapon, the maximum term of imprisonment for the underlying crime may be increased by not more than five (5) years.

THE BASIS FOR YOUR COMPLAINANT'S CHARGE FOR SUCH OFFENSES IS:

1. Your complainant, Gary Gillis, is an Investigator with the Sawyer County Sheriff's Department and has been employed as a law enforcement officer for seventeen years and makes this complaint based upon his personal knowledge, information and belief based on his own investigation.

2. The defendant, Chai Soua Vang, DOB 09/24/68, has a last known place of residence of 810 - 4th Street in Saint Paul, Minnesota.

3. Your complainant, along with fellow deputies from the Sawyer County Sheriff's Department, other law enforcement agencies, and Special Agents of the Division of Criminal Investigation, Wisconsin Department of Justice, have been assigned to investigate the shooting deaths of Dennis Drew, Mark Roidt, Robert Crotteau, Joe Crotteau, Allan Laski and Jessica Willers and the shootings of Lauren Hesebeck and Terry Willers. Your complainant believes the information set forth in this complaint to be truthful and reliable based upon complainant's personal knowledge as set forth herein, as well as upon information and belief based upon statements of citizen/witnesses as set forth herein each of whom had personal knowledge of that which they related; information received from fellow law enforcement officers which information is believed to be truthful and reliable as the information was obtained in the course of the officers' official duties; information received from Ramsey County Minnesota Medical Examiner ("Medical Examiner") Michael McGee and Assistant Medical Examiners ("Assistant Medical Examiner") Kelly Mills and Paul Nora, experts in the field of Pathology, who performed autopsies on the bodies of Dennis Drew, Mark Roidt, Robert Crotteau, Joe Crotteau, Al Laski and Jessica Willers; and statements of the defendant made to your complainant against his penal interest. The statements of Terry Willers and Lauren Hesebeck as set forth in this complaint

were provided to Special Agent John Christophersen of the Wisconsin Department of Justice, Division of Criminal Investigation.

4. On November 21, 2004, which was the second day of Wisconsin's rifle deer hunting season, at approximately 12:30 p.m. your complainant was dispatched to 394N Deer Lake Road in the Town of Meteor, County of Sawyer, State of Wisconsin, in response to a report of a shooting with multiple victims. After arriving on the scene, your complainant determined that Mark Roidt, Robert Crotteau, Joe Crotteau, Allan Laski and Jessica Willers were dead at the scene from apparent gun shot wounds. Your complainant also determined that Dennis Drew had been shot in the abdomen and was later advised on November 22, 2004, that Drew had died from his wounds. Your complainant also determined that Terry Willers had been shot in the neck and Lauren Hesebeck was shot in the shoulder.

5. Terry Willers stated that he and Robert Crotteau were co-owners of the property where the shootings occurred and that the property was the location of a deer hunting cabin which was being used by various family members and friends for the rifle deer hunting season which had begun the previous day. As Terry Willers was returning to the cabin from hunting that morning, and while carrying his hunting rifle slung over his shoulder, he observed an individual sitting in a tree stand located on the property. Terry Willers used a walkie talkie to communicate with other persons in the cabin and asked whether anyone was supposed to be in the tree stand. After being informed that no one should be in the tree stand, Terry Willers then approached the person, whom he described as an Asian male with a rifle, and told him to leave the tree stand and the property. Terry Willers then reported over the walkie talkie that he had told the individual, later identified as the defendant, to leave the property. Terry Willers then followed the defendant as the defendant walked down a trail.

6. The defendant advised your complainant that he was in the military from 1989 to 1991 and had qualified as a marksman and had hunted deer since 1992, including the vicinity where the events of November 21, 2004, occurred. The defendant also stated that on November 21, 2004, he became lost while hunting and came upon a tree stand that he climbed into with his rifle. About fifteen minutes later a hunter approached him and told him he was on private property. The defendant then climbed down and began walking away. As he was walking away he heard the hunter make a call on his walkie-talkie but did not hear what was said. Your complainant believes that this hunter was Terry Willers.

7. Lauren Hesebeck stated that after Terry Willers called back to the cabin, Hesebeck and Robert Crotteau, Joe Crotteau, Dennis Drew and Mark Roidt drove two all terrain vehicles ("ATVs") to where Terry Willers and the defendant were located. Hesebeck and Terry Willers stated that neither Hesebeck, Robert Crotteau, Joe Crotteau, Dennis Drew, nor Mark Roidt brought any firearms with them. Robert Crotteau informed the defendant that he was trespassing, told the defendant to leave and used profanity. Robert Crotteau also stated that he would report the defendant to the Department of Natural Resources ("DNR") and that maybe that would teach the defendant. Robert Crotteau then yelled out for someone to get the defendant's hunting license number and the number was yelled out and Terry Willers wrote down the number on an ATV. The defendant did not reply to Robert Crotteau but continued walking. Terry Willers and Hesebeck stated that at no time did anyone touch the defendant, make any threatening gestures, or threaten to shoot the defendant. The defendant stated that the hunters told him to leave the property and used profanity and racial slurs. The defendant admitted to your complainant that he heard someone in the group say that the defendant's hunting license tag number should be written down and that he also heard someone say they were going to turn in

the defendant to a warden. The defendant stated that the hunters told him to “follow the ATV trail and get the fuck out of here and never come back.” The defendant also stated that the only person he saw with a gun was the person who first approached him in the tree stand.

8. Terry Willers and Hesebeck stated that after the defendant walked away no one followed the defendant and that Terry Willers began walking through the woods toward the cabin while the other individuals turned the ATVs around to head back to the cabin. Hesebeck stated that he looked back and saw the defendant about 20-30 yards away with his back turned doing something with his firearm and then saw the scope on the defendant’s gun drop off. Hesebeck then saw the defendant turn and point his rifle at Willers who was about 25 yards away from Hesebeck. Hesebeck and Terry Willers stated that at that point, Terry Willers unslung his rifle and held it in front of his body but did not point it at the defendant and yelled for the defendant to put the gun down and get out of here. Hesebeck and Terry Willers stated that the defendant then started shooting. Terry Willers stated he dived to the ground and heard one round hit near him and then a second round struck him in the neck and exited his shoulder and that the shot paralyzed him. Terry Willers stated that he then heard additional shots fired and saw Dennis Drew on the ground. Hesebeck stated that he jumped off the ATV and heard multiple shots and to his right saw Drew down and behind him saw Roidt down.

9. Your complainant has reviewed a provisional report of an autopsy of Mark Roidt performed by Assistant Medical Examiner Paul Nora on November 22, 2004. Dr. Nora’s report states that the cause of Roidt’s death was a gunshot wound to the head. Your complainant has reviewed a provisional report of an autopsy of Dennis Drew performed by Medical Examiner Michael McGee on November 23, 2004. Dr. McGee’s report states that the cause of Drew’s death was a gunshot wound to the abdomen that entered on his left side.

10. The defendant initially told your complainant that he did not shoot any of the hunters. The defendant stated that the first hunter he saw who had a gun took the defendant's gun and shot the others and then forced the defendant to walk to each of the bodies. The defendant later changed his story.

11. In the defendant's second version recounting the incident, he stated that he walked about 15 to 20 yards away from the other hunters and turned around and saw the man who had a rifle walking toward the other hunters, take the rifle off his shoulder and take it into his hands. The defendant stated he then heard someone yell, "What did you say?" The defendant stated he replied, "I didn't say anything," and the other person responded, "I saw you give me the finger." The defendant stated he again replied that he didn't say anything. The defendant stated he continued walking about another ten yards when he looked back again and saw the man with the rifle pointing the rifle at him. The defendant states that he then dropped into a crouch position and the person shot at the defendant but missed. The defendant then removed the scope from his rifle and shot twice at the man with the rifle who dropped to the ground. The defendant then saw the other men run toward the ATVs, which had gun cases, and he thought they were going for guns. The defendant stated he then started to shoot at the men near the ATVs and saw two or three more men fall to the ground. Your complainant personally examined the ATVs at the scene of the shooting and observed that none of them contained any guns, gun cases, or gun racks.

12. Lauren Hesebeck also stated that after Terry Willers, Drew and Roidt were shot, he attempted to hide behind an ATV but the defendant appeared at the ATV and shot at him three times as he scrambled around the ATV and that the third shot hit him in the shoulder. After being shot and collapsing, Hesebeck heard additional shots. Hesebeck pointed out the area

where these additional shots originated to Agent Christophersen. Agent Christophersen stated that the location was in the area of where Robert Crotteau's body was found, approximately 40 yards away from the ATVs. Hesebeck stated that he then heard additional gunshots and pointed out the area where these shots originated to Agent Christophersen. Agent Christophersen stated that the location was in the area of where Joe Crotteau's body was found, approximately 467 feet away from the ATVs. Your complainant states that there were no firearms found near the bodies of either Robert or Joe Crotteau. The defendant stated that he saw a man running through the woods toward the cabin yelling for help and ran after him and shot at him two or three times. The defendant stated that the man was not armed but that he thought the man was going for help or a gun. The defendant stated that when he was about 15 to 20 feet away from the man he shot him in the back.

13. Your complainant has reviewed a provisional report of an autopsy of Robert Crotteau performed by Assistant Medical Examiner Kelly Mills on November 22, 2004. Dr. Mills' report states that the cause of death of Robert Crotteau was a single gunshot wound to the lower back. Your complainant has reviewed a provisional report of an autopsy of Joe Crotteau performed by Medical Examiner Michael McGee on November 22, 2004. Dr. McGee's report states that the cause of death of Joe Crotteau was multiple gunshot wounds. The report further indicates that Joe Crotteau was shot four times, all shots entered from the back.

14. Hesebeck stated that after the defendant shot him he began to provide first aid to Terry Willers and Drew and used a walkie-talkie to call back to the cabin stating that he had been shot and needed help. Carter Crotteau stated to Special Agent Jody Wormet, that in response to the call for help he left the cabin, unarmed, on an ATV. On the way he picked up Brandon Willers who had been hunting and was armed. With the assistance of Hesebeck, Brandon

Willers and Carter Crotteau removed Terry Willers from the area. The defendant stated that he heard someone call on a walkie-talkie, "We've been shot and need help." The defendant stated he observed three men approach on an ATV and stated that they were all armed with rifles, so he did not shoot at them. As the men approached, the defendant stated he turned his reversible coat from orange to camouflage and reloaded his firearm.

15. Carter Crotteau and Brandon Willers stated that on their way back to the cabin with Terry Willers, they were passed by another ATV being ridden by Allan Laski and Jessica Willers, who were heading toward the scene. Hesebeck advised officers that after Terry Willers was removed from the scene, he heard another ATV approaching the area and then heard more gunshots and the ATV stopped. The defendant stated that he observed another ATV approaching with two people and that the driver had a gun on his shoulder. The defendant then began to run and the ATV drove past the defendant and stopped about 10 to 15 feet away from the defendant. The defendant stated that the people on the ATV saw him and one man removed the gun from his shoulder with one hand while he kept his other hand on the ATV handlebars. The defendant stated that he then shot three or four times and both people fell off the ATV onto the ground. Based upon your complainant's personal examination of the scene, the two persons described above were Allan Laski and Jessica Willers, whose bodies were found lying at the edge of an ATV trail 50 to 60 yards away from the scene of the original shootings. Based upon your complainant's personal examination of the scene, there were no firearms located near the bodies of Laski or Jessica Willers. Hesebeck stated that there were no weapons on the ATV.

16. Your complainant has reviewed a provisional report of an autopsy of Allan Laski performed by Assistant Medical Examiner Kelly Mills on November 22, 2004. Dr. Mills' report states that the cause of death of Allan Laski was multiple gun shot wounds. The report further

indicates that one shot entered his lower back, one shot entered his mid-back, and the third shot entered his right buttock. Your complainant has reviewed a provisional report of an autopsy of Jessica Willers performed by Assistant Medical Examiner Kelly Mills on November 22, 2004. Dr. Mills' report states that the cause of Jessica Willers' death was multiple gunshot wounds. The report further indicates that there were two gunshots to the back of her body with one entering her upper back and the other her left buttock.

17. Hesebeck also stated that after hearing the shots after the second ATV approached, the defendant appeared near his location and the defendant stated something to the effect of, "Fucker's still alive." Hesebeck stated that prior to that he had obtained Terry Willer's rifle, and after the defendant's statement he dived behind a dirt hill. Hesebeck also stated that after making the statement the defendant fired once or twice at him and that Hesebeck shot at the defendant once, after which the defendant turned and ran away. The defendant stated that after shooting the two people on the ATV he started running back to the area of the original shooting and saw one of the men still standing and that the defendant then yelled, "You're not dead yet?" The defendant states that he then shot one more time in the direction of the man but did not know whether he hit him or not. The defendant stated he continued to run down the ATV trail.

18. The defendant stated that after the events described above he ran away and did not return. He also stated that at one point he decided that he did not want to shoot anybody else so he threw his remaining ammunition into a swamp. The defendant further stated that about an hour after throwing away the ammunition, he heard an airplane overhead and thought that the plane was looking for him so he decided to turn himself in.

19. Your complainant has reviewed a report of DNR warden Jeremy Peery that reflects that during the afternoon of November 21, 2004, he was involved in searching for the

defendant. During the afternoon Warden Peery was informed by Darrell Gass that while hunting he met an individual he described as a Hmong wearing camouflage and carrying a black rifle who stated that he was lost and asked how he could get to a road. Your complainant has reviewed a report prepared by Deputy Jeff Cain which reflects that he was advised by Walter Cieslak that he was hunting near Serly Camp road when the defendant appeared wearing camouflage clothes and a rifle slung on his back. The defendant advised Cieslak that he had been hunting, was lost, and asked for a ride. Cieslak offered to drive the defendant to Cieslak's truck. Cieslak also stated that when they arrived at his truck they were met by a DNR warden who took the defendant into custody. The defendant stated that he came across a hunter with an ATV and asked him for a ride to the road and that the hunter drove the defendant to the hunter's cabin where a DNR warden was waiting.

20. Warden Peery's report also indicated that after dark an ATV driven by Walter Cieslak with the defendant therein, pulled up to his truck. Walter Cieslak stated, "This guy is lost, can you help him?" Warden Peery then placed the defendant under arrest and seized a black SKS semiautomatic rifle which the defendant was holding and was later determined to be unloaded. Warden Peery also stated that the defendant complied with his commands but never made any statements and seemed extremely calm.

Your complainant, therefore, prays that the defendant be charged and dealt with according to law.

Dated this _____ day of November, 2004.

GARY GILLIS

Subscribed and sworn to before me
this _____ day of November, 2004.

ROY R. KORTE
Assistant Attorney General
Special Prosecutor for Sawyer County
State Bar No. 1019492

Approved for filing this _____ day of November, 2004.

DONALD V. LATORRACA
Assistant Attorney General
Special Prosecutor for Sawyer County
State Bar No. 1011251