

STATE OF WISCONSIN

CIRCUIT COURT

SHEBOYGAN COUNTY

STATE OF WISCONSIN

**CRIMINAL COMPLAINT**

-VS-

Lao Jin  
2112 N Sixth Street  
Sheboygan, WI 53081  
DOB: 01/27/1973  
Sex/Race: M/W  
Alias: Lijah J Botdorf  
Defendant.

DA Case No.: 2013SB001232  
Assigned DA/ADA: Jennifer A Bork  
Agency Case No.: C13-06696  
Court Case No.: 2013CF DVO

Kristine Thurs, Sheboygan Police Department, being first duly sworn on oath deposes and says on information and belief:

**Count 1: POSSESSION OF SHORT-BARRELED SHOTGUN OR RIFLE**

The above-named defendant on Tuesday, April 09, 2013, in the City of Sheboygan, Sheboygan County, Wisconsin, did possess a short-barreled shotgun, contrary to sec. 941.28(2), 939.50(3)(h) Wis. Stats.

Upon conviction for this offense, **a Class H Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.**

**Count 2: SECOND DEGREE RECKLESSLY ENDANGERING SAFETY**

The above-named defendant on or about March 20 to March 27, 2013, in the City of Sheboygan, Sheboygan County, Wisconsin, did recklessly endanger the safety of A.J. (DOB: 6/5/2000), contrary to sec. 941.30(2), 939.50(3)(g) Wis. Stats.

Upon conviction for this offense, **a Class G Felony, the defendant may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.**

**Count 3: STRANGULATION AND SUFFOCATION**

The above-named defendant between August, 2010 to June 2011, in the City of Sheboygan, Sheboygan County, Wisconsin, did intentionally impede the normal breathing by applying pressure on the throat or neck of another person, contrary to sec. 940.235(1), 939.50(3)(h) Wis. Stats.

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Upon conviction for this offense, a Class H Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

**Count 4: PHYSICAL ABUSE OF A CHILD - INTENTIONALLY CAUSE BODILY HARM**

The above-named defendant between August, 2010 to June 2011, in the City of Sheboygan, Sheboygan County, Wisconsin, did intentionally cause bodily harm to a child, ACJ, DOB 06/05/2000, contrary to sec. 948.03(2)(b), 939.50(3)(h) Wis. Stats.

Upon conviction for this offense, a Class H Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

**Count 5: MENTAL HARM TO CHILD**

The above-named defendant from June 2005 to April 10, 2013, in the City of Sheboygan, Sheboygan County, Wisconsin, did, while exercising temporary or permanent control of a child, cause mental harm to that child by conduct which demonstrates substantial disregard for the mental well-being of the child, contrary to sec. 948.04(1), 939.50(3)(f) Wis. Stats.

Upon conviction for this offense, a Class F Felony, the defendant 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 6: PHYSICAL ABUSE OF A CHILD - INTENTIONALLY CAUSE GREAT BODILY HARM**

The above-named defendant on or about March 27, 2013, in the City of Sheboygan, Sheboygan County, Wisconsin, did intentionally cause great bodily harm to a child, SDJ, DOB 07/20/1998, contrary to sec. 948.03(2)(a), 939.50(3)(c) Wis. Stats.

Upon conviction for this offense, a Class C Felony, the defendant may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

**Count 7: MENTAL HARM TO CHILD**

The above-named defendant from July 2003 to April 10, 2013, in the City of Sheboygan, Sheboygan County, Wisconsin, did, while exercising temporary or permanent control of a child, cause mental harm to that child by conduct which demonstrates substantial

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disregard for the mental well-being of the child, contrary to sec. 948.04(1), 939.50(3)(f) Wis. Stats.

Upon conviction for this offense, **a Class F Felony, the defendant 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 8: PHYSICAL ABUSE OF CHILD**

The above-named defendant on Thursday, January 31, 2008, in the City of Sheboygan, Sheboygan County, Wisconsin, did intentionally cause great bodily harm to a child, SDJ, DOB 07/20/1998, contrary to sec. 948.03(2)(a), 939.50(3)(e) Wis. Stats.

Upon conviction for this offense, **a Class E Felony, the defendant may be fined not more than Fifty Thousand Dollars (\$50,000), or imprisoned not more than fifteen (15) years, or both.**

**Count 9: SECOND DEGREE RECKLESSLY ENDANGERING SAFETY, DOMESTIC ABUSE**

The above-named defendant on Sunday, April 24, 2011, in the City of Sheboygan, Sheboygan County, Wisconsin, did recklessly endanger the safety of VJ (dob: 1/2/1973), contrary to sec. 941.30(2), 939.50(3)(g), 968.075(1)(a) Wis. Stats.

Upon conviction for this offense, **a Class G Felony, the defendant may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.**

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 10: MISDEMEANOR BATTERY, USE OF A DANGEROUS WEAPON, DOMESTIC ABUSE**

The above-named defendant on Good Friday of 2011, in the City of Sheboygan, Sheboygan County, Wisconsin, did cause bodily harm to another by an act done with intent to cause bodily harm to that person, without that person's consent, contrary to sec. 940.19(1), 939.51(3)(a), 939.63(1)(a), 968.075(1)(a) Wis. Stats.

Upon conviction for this offense, **a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.**

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And further, invoking the provisions of sec. 939.63(1)(a) Wis. Stats., **because the defendant committed this crime while using a dangerous weapon, the maximum term of imprisonment may be increased by not more than 6 months.**

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 11: DISORDERLY CONDUCT, DOMESTIC ABUSE**

The above-named defendant in the month of October, 2012, in the City of Sheboygan, Sheboygan County, Wisconsin, while in a public or private place, did unlawfully engage in violent, abusive, indecent, profane, boisterous, unreasonably loud or otherwise disorderly conduct, under circumstances in which the conduct tended to cause or provoke a disturbance, contrary to sec. 947.01(1), 939.51(3)(b), 968.075(1)(a) Wis. Stats.

Upon conviction for this offense, **a Class B Misdemeanor, the defendant may be fined not more than One Thousand Dollars (\$1,000), or imprisoned not more than ninety (90) days, or both.**

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 12: MENTAL HARM TO CHILD**

The above-named defendant in September, 2007 to April 10, 2013, in the City of Sheboygan, Sheboygan County, Wisconsin, did, while exercising temporary or permanent control of a child, cause mental harm to that child by conduct which demonstrates substantial disregard for the mental well-being of the child, contrary to sec. 948.04(1), 939.50(3)(f) Wis. Stats.

Upon conviction for this offense, **a Class F Felony, the defendant 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 13: MENTAL HARM TO CHILD**

The above-named defendant from January, 2009 to April 10, 2013, in the City of Sheboygan, Sheboygan County, Wisconsin, did, while

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exercising temporary or permanent control of a child, cause mental harm to that child by conduct which demonstrates substantial disregard for the mental well-being of the child, contrary to sec. 948.04(1), 939.50(3)(f) Wis. Stats.

Upon conviction for this offense, **a Class F Felony, the defendant 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 14: PHYSICAL ABUSE OF A CHILD - INTENTIONALLY CAUSE BODILY HARM**

The above-named defendant from September, 2011 to June, 2012, in the City of Sheboygan, Sheboygan County, Wisconsin, did intentionally cause bodily harm to a child, KJJ, DOB 06/13/2006, contrary to sec. 948.03(2)(b), 939.50(3)(h) Wis. Stats.

Upon conviction for this offense, **a Class H Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.**

**Count 15: MENTAL HARM TO CHILD**

The above-named defendant from June, 2011 to April 10, 2013, in the City of Sheboygan, Sheboygan County, Wisconsin, did, while exercising temporary or permanent control of a child, cause mental harm to that child by conduct which demonstrates substantial disregard for the mental well-being of the child, contrary to sec. 948.04(1), 939.50(3)(f) Wis. Stats.

Upon conviction for this offense, **a Class F Felony, the defendant 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.**

The basis of complainant's charge of such offense is: Official reports prepared by Officer Sarah Blodgett of the Sheboygan Police Department, which reports indicate that on April 9, 2013, Officer Blodgett was dispatched to Campus Life where she spoke with Sara Jean Litke who advised that she is involved with Bible study and had spoken and met with AJ, DOB 06/05/00. Sara Jean advised that AJ began to ask questions about what the Bible indicates is okay for discipline versus when it become abuse. Sara Jean informed Officer Blodgett that AJ began to discuss some of the passages in the Bible pertaining to both abuse and discipline. Sara Jean indicated that

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she began to gather information from AJ about what was occurring with AJ indicating that she knew somebody, but she could not tell because the person might get hurt. Sara Jean further advised that whenever AJ would speak, she would refer to a friend.

Sara Jean told Officer Blodgett that AJ asked her if getting hit when not getting cigarettes quick enough was okay according to the Bible. Sara Jean stated that she explained to AJ that it was not okay and asked AJ if she was being abused. Sara Jean stated that AJ began to cry and stated that she did not want to talk about it. However, Sara Jean told Officer Blodgett that AJ told her that her, AJ's, father hits her and stated that he had to prepare her for how the world would treat her. AJ went on to explain a time when her father threatened her with a gun and indicated that if she ever told anyone he would kill her and the rest of her family. AJ stated that her father has threatened her mother on multiple occasions that if she ever left or told anyone, he would fire them and kill them and the rest of their family. Sara Jean explained that AJ was afraid to say anything because she felt that her, AJ's, father, Lao Jin, DOB 01/27/73, was going to kill her.

Officer Blodgett spoke to AJ who indicated that her father has been physically, mentally, verbally and emotionally abusive to her. She explained that from approximately kindergarten to fourth grade, her father would often abuse her.

Officers also made contact with AJ's mother, VJ, DOB 01/02/73. Officers informed VJ that they would be taking her husband, Lao, hereinafter the Defendant, into custody. At that time, VJ indicated that she was afraid to speak with Officer Blodgett. When Officer Blodgett asked her why, she indicated that she was afraid of what was going to occur. VJ expressed genuine concern for the welfare of herself and her children.

VJ indicated to officers that she was unaware of issues of abuse that occurred in the past but also indicated that she was becoming more aware of it. When Officer Blodgett asked VJ to explain, VJ said she did not know if she could. VJ stated that officers would be able to obtain some information by looking into other agencies such as Social Services reports, but indicated that there were reports of abuse and in all concerns, there would be lies to cover up the abuse. VJ implied that they lied due to the verbal threats made by the Defendant, her husband, that if they did speak the truth, there would be physical harm to death that would follow.

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Officers met with the Defendant. Initially, while attempting to take him into custody, the Defendant was walking with a cane that had a sword in it.

After the Defendant was in police custody, Officer Blodgett spoke again with VJ. VJ made a statement at one point that her and all her children are afraid of their house and that is why they are not there, because they are afraid of the things that occur in their residence. VJ stated that they are afraid to stay in their own residence, but they are also afraid of leaving the Defendant due to statements he has made in the past.

Officer Blodgett made contact with another of VJ and the Defendant's children, SDJ, DOB 07/20/98. Officer Blodgett advised SDJ that most likely a detective would be speaking to him the next day. SDJ stated that he would be afraid and did not know if he wanted to speak to officers. He asked for Officer Blodgett to explain the court process from thereon and Officer Blodgett explained that the Defendant would have a court hearing the next morning. SDJ stated he was afraid nothing was going to happen and that his dad was going to come out and think they were all a "snitch" and thus felt his father would cause them all great bodily harm. It should be noted that AJ, VJ, and SDJ all expressed verbally and physically extreme concern for their safety from the Defendant.

On April 10, 2013, Officer Hall of the Sheboygan Police Department was sent to the Defendant's residence, which was also the residence of VJ and VJ's and the Defendant's children, 2112 North 6th Street, in the City of Sheboygan, County of Sheboygan, State of Wisconsin. Officers were allowed to remove firearms from the residence, ultimately obtaining a total of six firearms. One of the firearms was a Beretta, .25 caliber, Model 950. Along with the Beretta was a loaded magazine with .25 caliber ammunition. Officer Hall showed the Beretta to AJ who advised that the gun was the one that the Defendant previously used to threaten her. While standing in the residence as VJ searched for other handguns in the basement, Officer Hall observed a sawed-off, 12-gauge, double-barrel shotgun. At the police department, it was determined that the shotgun had a barrel with a length of 17-5/8 inches and was under 26 inches in length.

On April 10, 2013, Detective Remington of the Sheboygan Police Department spoke with SDJ. SDJ explained that his father, the Defendant, is controlling, threatening and always wants to be in control. SDJ said he has been fearful of the Defendant and that the Defendant would be fine one minute and the next minute, he would be pissed off. SDJ said that about two weeks ago, on or about March 27, 2013, the Defendant "stripped me down," "lifted me up by the

neck" and put SDJ against a wall. SDJ explained that his father had him take most of his clothes off prior to the Defendant grabbing him by the neck and lifting him up. SDJ further explained that the Defendant took the dog zapper, or shock collar, put it on SDJ and demanded SDJ to tell him the truth. SDJ said he was scared by his father's actions. SDJ again stated that this was two weeks ago and when asked if his father shocked him, he stated he did not recall because he was scared and he blocked it out. SDJ stated this was all because his father wanted to know the truth because SDJ did not go to wrestling practice as he was told by the Defendant to do and instead went to his friend's house. SDJ said, "I have become used to it. Now it's normal to me. It was way worse two years ago. Now, it's mainly threats, except for choking thing two weeks ago."

SDJ advised Detective Remington that prior to the incident two weeks earlier, the Defendant last physically SDJ about a year and a half ago. SDJ said the Defendant "used to grab my neck two to three times a day to get me to pay attention." SDJ also told officers that he, SDJ, gets in front of his siblings to protect them from his father when SDJ senses that it is going to happen to his siblings; he explained that he would rather just get the beating. When SDJ could sense that the Defendant was about to take out his anger and punish the other siblings, SDJ would "deliberately piss him off by not saying (yes sir and no sir) to get him to react to me. I thought he'd hurt my siblings." SDJ said it was just a vibe he would get before the Defendant would direct his anger towards the children. SDJ went on to explain that he generally feels safe because he can tell when something is brewing. SDJ said he has been "disassociating" himself from his dad and getting his dad out of his life.

Reference the physical abuse by his father, SDJ said, "In my mind it's unfair. I somewhat realize now that I'm older." SDJ also told officers that he realized it is now "extreme punishment".

Reference the firearms, SDJ said he never has seen his father make threats using firearms, however, "I tend to forget about it as soon as I can". SDJ explained that the Defendant has made verbal threats "like overpowering". SDJ explained that the Defendant would get a big stick and walk around with it in the house or he would make a weapon and say things like "I guess I get to use this now" or "I get to use my new stick and whip it" and he would whip it, lashing it outwards. SDJ said the Defendant would do this to show his control and dominance over the person that he was talking to.



SDJ also recalled an incident from third grade. SDJ recalled coming home a little bit late and the Defendant "punched, kneed, elbowed me for 20 minutes."

SDJ also recalled having to clean the patio area outside and when his dad came to check it out, he saw that SDJ had left a little piece of trash out so the Defendant grabbed a high pressure hose and shot the hose into SDJ's mouth.

SDJ recalled another time when he was nine years old. SDJ described the Defendant being angry because somebody left the margarine out of the refrigerator overnight. SDJ knew that he was not the person who left the margarine out, but he was worried that his sisters would get in trouble so he took the blame for it. SDJ stated he did not know what the big deal was because the margarine had not gone bad by sitting out overnight. The Defendant proceeded to mix vinegar and what SDJ believed to be teriyaki and various unknown disgusting ingredients into the margarine and then he also added ashes to the margarine and stirred it up. The Defendant said that the margarine mixture looked like the Defendant's lungs from smoking. SDJ said, "He [the Defendant] made me eat the whole thing."

SDJ also recalled finding a new Nerf gun and taking it home. He said that the Defendant accused him of stealing it and "he hung me up on a nail in basement." SDJ stated that he was made to stand up on his toes while he was tied up in the basement with arms above his head and was hung up to a nail. The Defendant told him that if he escaped "your ass is grass". SDJ explained that he recalled the Defendant calling him a liar and cheater and that the Defendant told him he would be in jail by the age of 18.

When Detective Remington spoke to VJ on April 11, 2013, VJ indicated that she knew SDJ was slammed against the wall two weeks ago, on or about March 28, 2013, explaining that she "heard it". VJ advised that the incident happened near the steps going down to the basement. She was on the other side of the wall and she heard the Defendant slam SDJ against the wall. VJ stated that the Defendant grabbed SDJ by the neck and lifted him off the ground.

VJ also advised that when she was working on January 31, 2008, she received a call that the Defendant and SDJ were goofing around and SDJ cut his head on the doorframe. SDJ ultimately received stitches on his head. VJ explained that there was "blood all over the doorframe. It looked really bad when I got home." VJ also informed officers that AJ later made a comment to her that goofing around was not really what happened. A couple of days later, VJ asked SDJ what

happened with SDJ saying, "Mom, you're not stupid, what do you think happened."

All of the incidents SDJ referred to between he and the Defendant were described as occurring at the family home in the 2100 block of North 6th Street.

On April 10, 2013, Detective Remington also spoke with AJ. AJ stated that she was being abused by her father, the Defendant, at home, identified as 2112 North 6th Street. AJ said the abuse was as recent as two to three weeks ago when she was helping her father in the basement, which Your Complainant asserts would have been on or about March 20th to March 27th of 2013. She said that while in the basement with the Defendant, he grabbed a handgun, pointed it at her and said, "You should be in pain because I am. You should die because I am going to." AJ said it is not right and felt "scared and worthless".

AJ stated that in kindergarten she recalled that the Defendant picked her up by her hair and threw her down on the ground. She stated that that her brother, SDJ, was present when the Defendant did this to her, but her brother was not in the position to help her. She advised that this really hurt.

Additionally, AJ stated that when she was in kindergarten the Defendant would hit her with bamboo rods and a fishing pole. She said that she had marks on her body from her father making her lay down and whipping her with bamboo rods and a fishing pole. According to AJ, the Defendant would make her lay down and would break bamboo sticks on her. AJ added that if she would cry, the Defendant would hit her more and more rapidly.

AJ recalled a time when she was in first grade when she and her brother were cleaning and the Defendant was not happy with how they were cleaning. She stated the Defendant put them both in a wooden trunk for about two hours. AJ stated that she has asthma problems and needed her inhaler when she was locked in the trunk by the Defendant. She stated she felt like she was "going to die" because she needed her inhaler and was locked inside a trunk. The trunk was the size of a kitchen table in the residence at 2112 North 6th Street. Detective Remington observed that the table she was talking about was approximately 2-1/2 to 3-feet wide and approximately 4-feet long. AJ said that the Defendant put her and SDJ into the trunk and locked the trunk so they could not get out. AJ said that the Defendant left the trunk open approximately one inch so they could get enough air into breathe. However, AJ stated that the Defendant would not give her inhaler to her for approximately 30

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minutes and she felt claustrophobic and like she was going to have an asthma attack. AJ described the incident as "terrifying".

AJ also recalled an incident that occurred when she was in the third grade. She described cleaning the kitchen and her father being upset because of the dust behind the refrigerator. AJ said that she is allergic to dust, but her father took the pile of the dust and made her eat it. She also indicated that according to the Defendant, if she puked, she had to eat her own puke. She advised that this incident also made her feel worthless.

AJ also recounted to officers that the Defendant would "hold guns to me" and say things like "I am going to kill you". AJ also recalled the Defendant telling her to clean and then banging her head into the bricks on the floor because she missed garbage on the floor. AJ stated she sustained a bump on her head from the banging into the floor incident. AJ also told officers that she recalled her father unplugging the cords of the land line phone in the home so she could not call anybody, including her mother.

AJ then explained that two years ago on Good Friday, which Your Complainant asserts was April 24, 2011, the Defendant pulled a gun on her and pointed it at her. AJ stated she believed the gun was loaded. The Defendant had three loaded guns and pulled a gun on her, her mother, VJ, and her three younger sisters. They were in a hallway/landing upstairs at the residence. AJ advised that this is what God told the Defendant to do. AJ also advised that during the same incident, the Defendant hit VJ on her head and neck with the gun, which caused her pain. AJ took her three little sisters to the bedroom because she did not want them to get hurt and to protect them. AJ's eyes were tearing up as she was recalling needing to protect her sisters and worrying about them being harmed.

When Detective Remington, on April 11, 2013, spoke with VJ, she stated that on Good Friday, 2011, the Defendant pulled a gun on her. VJ stated that the Defendant threatened to kill her. The Defendant kept hitting VJ with the barrel into her head. VJ explained that at some point she grabbed the gun and tried to get it from him. VJ said, "I told AJ to take the girls and run and he said that if they left their room, he'd kill me and it would be their fault. They were screaming and crying." The Defendant told VJ that if she let go of the gun, he would let go of the girls. VJ let go of the gun but he did not let go of the girls. The Defendant hit her with the gun and started poking her with the gun in her neck. VJ indicated that the Defendant forcefully poked or prodded the barrel of the gun into her neck. VJ stated, "He kept saying stuff, telling me how bad I was and how it's God's will that I will die."

AJ advised that the Defendant makes threats and tells AJ that he will kill her and the threatens to kill her when she is sleeping. Additionally, AJ stated the Defendant threatens that he will kill her if she tells anybody about him hurting her. AJ's father stated that it is her fault and other family members' fault that he is sick.

AJ stated that when she was in fourth grade, her father could not find his cigarettes, so he hit her with wood and "choked me" because he thought that AJ took the cigarettes. The incident occurred in the hall by the basement in the family home. AJ recalled that her mother was present during the incident and witnessed it. AJ said that the Defendant "hit me with a board in the head. He choked me in the hallway, lifted me up off the ground, I couldn't breathe. I felt like I was suffocating." The incident would have been the school year of August to June of 2010 to 2011.

AJ explained to officers that her father got sick around the time she was in fourth grade. The Defendant was described as having a heart problem and getting weaker. AJ said that the Defendant blames the sickness on AJ and the other children "because we don't love him and don't do what he says."

AJ informed officers that it two to three weeks ago her father pointed a gun at her in the basement and three to four months ago he said something to the effect of when he dies he would write a letter to say it was AJ's fault. AJ said that she does not go by her father and tries to stay away from him now. AJ also explained that her younger sisters are scared that their father will kill them when they sleep.

Three days ago, the Defendant told the youngest sister, KJJ, DOB 06/13/06, that he would "rip her head off if she runs up the stairs again".

The incident indicating that he was going to write a letter that it was AJ's fault that he was going to die about three to four months ago would have been on or about December, 2012 to January, 2013, and April 7, 2013, is the day that the Defendant would have told KJJ that if she runs up the stairs again, he would rip her head off. All of these incidents again would have occurred at the 2100 North 6th Street residence, in the City of Sheboygan, County of Sheboygan, State of Wisconsin.

AJ said, "We're too scared to tell anyone. He threatens to kill us. I was scared to admit it last night, afraid he'd kill me. She

stated it was having her friend with her that gave her courage to finally speak up and talk about the abuse by her father. She said she was at church in a youth camp group when she finally told of the abuse. She said she is doing okay in school but it is difficult for her to concentrate and she can't focus in school because of what has been going on at her house with her father. AJ said she felt scared to report what the Defendant has done to her and she said now she's "really scared". Once the Defendant gets out of jail, AJ said he is going to kill me and I did nothing wrong. AJ started to cry and appeared frightened and stated that her dad threatens her a lot, saying, "I'll kill you if you tell anyone." AJ said the Defendant is fearful because he thinks he will get "put away in jail because he hits us. He knows what he does is wrong." AJ said her father, the Defendant, previously said, "He'll kill me tonight when I'm sleeping." AJ said she is very scared about telling about her father and other family members as her father said, "If I tell, he'll kill me and everyone that I care about."

Regarding the physical abuse, she advised that she was hit in her joints, back, behind, legs, arms and face. She's had scratches and red marks. She stated she hears her father calling her mom "retarded and stupid" and the Defendant tells her that he is going to kill her.

On April 11, 2013, Detective Remington spoke with VJ and stated that the Defendant always blames her and says things are her fault and never takes the blame for anything. VJ advises that he rules the house by fear. VJ stated that that's how she has been living in her house in fear. She explained that "it's not like I'm going to kill you. It's maybe I'll just slowly torture you and just watch you die. It's calculated and it goes farther and it's, you know what I think, I'm going to track your friends and your family members and kill them all and you believe him." VJ stated I'm scared cause if he gets out, I'm scared. VJ stated the Defendant will still act out on her and does so on the kids. She stated the Defendant is upset because to him the children can never do anything right.

She advised that she was choked about 1-1/2 years ago and she advised that it's not like her air was cut off and she was about to pass out but he gets you at least in a way you're almost on your tippy toes but you're not, you're against the wall." VJ went to demonstrate how the Defendant would grab her at the front of her neck with the thumb and four other fingers shaped in a "C-clamp" with the thumb pushed up and the other one side of her neck/side of the throat and the other side of the "C-clamp" pushed up and under the opposite side of the front of her neck/side of the throat with pressure back and lifting upwards. She said this would occur as he

pushes her up into a wall. This incident would have occurred on or about October of 2012 in the 2100 block residence of North 6th Street, in the City of Sheboygan, County of Sheboygan, State of Wisconsin. VJ acknowledged that the Defendant would grab the family members by the neck frequently. She said the Defendant will sometimes grab the flesh on the front of their necks and twist it around to tighten the neck flesh at the throat. Sometimes, more recently, he started just stroking the side of the throat as a reminder that at any time he can grab the person by the neck/choke or twist the neck.

On April 10, 2013, Detective Stewart spoke with HMJ, DOB 06/16/02, and she indicated that her dad, the Defendant, yells a lot at mom and breaks things. HMJ indicated that he has guns and advised that she saw the Defendant almost shoot her mom. HMJ said this was when she was a little kid. She said she was eight at the time and saw dad point a gun at mom. She made a comment that her dad said that she didn't believe in the lord. Her father pointed the gun at her and made her say something. HMJ indicated that the Defendant has never pointed the gun at her and she usually has time outs. HMJ is worried that AJ and SDJ are going to get shot as they get yelled at a lot and she is worried for them.

On April 10, 2013, Detective Stewart also spoke with VLJ, DOB 09/04/04. VLJ indicated that she is scared of her dad. VLJ stated things similar to her dad says that if you do not be quiet, something bad will happen. VLJ stated that the Defendant sometimes hurts them and that is why she is scared of him, too. VLJ indicated that the Defendant hits her. VLJ also indicated that the Defendant mostly hits us. VLJ stated the Defendant hits her with his hands mostly. VLJ stated she is not sure how he hits but the Defendant hits her on the bottom and only on the bottom but that was a long time ago.

VLJ recalled a time when the Defendant hit KJJ with a cane on her head and her head started to bleed. VLJ stated she did not see KJJ get hit in the head but saw the blood and the blood made her scared and sad.

VLJ also indicated that her father at one time, a really long time ago, threatened to shoot her mother when he was angry. VLJ said he tried to shoot her in the head. This happened in the upper hallway and she was in a bedroom with AJ, KJJ and HMJ. She said that instantly she got really scared and that they had seen a little bit of it. VLJ indicated she does not feel safe at home with her dad. VLJ indicated that she does not hang out in her dad's room and her dad's room, the lair, in the basement is a creepy place.

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On April 10, 2013, Detective Stewart also made contact with KJJ, DOB 06/13/06. KJJ indicated that between September of 2011 and June of 2012, her father choked her with his cane and hit her on the head with the cane. She indicated that it hurt, it cracked her head open, and caused her to bleed and her mother placed ice on her head. KJJ advised that another time before she was in school, the Defendant said that he was going to kill her. The Defendant brought a gun upstairs. She ran and hid in her room under the covers of the bed because she thought he was going to kill her. KJJ said that he could not find her. KJJ said that she did see the gun and that the Defendant had obtained a long gun.

On another occasion, KJJ recalled when if she did not go upstairs, he indicated that the Defendant would rip her head off. KJJ recalled an incident where her father had pointed a gun at her mother and her mother had hit her head. KJJ advised that she had forgotten a lot of incidents that have happened. KJJ indicated that the Defendant yells and uses bad words and she says she feels hurt. KJJ says the Defendant always yells at the family and has hurt everyone else in the house. All of the above actions occurred at the residence in the 2100 block at North 6th Street in the City of Sheboygan, County of Sheboygan, State of Wisconsin.

Subscribed and sworn to before me  
this 16th day of April, 2013  
and approved for filing:

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Assistant District Attorney  
Sheboygan County, Wisconsin

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Complainant