

State of Minnesota
County of Washington

District Court
10th Judicial District

Prosecutor File No. CR-2016-1851
Court File No. 82-CR-17-242

State of Minnesota,
Plaintiff,

COMPLAINT
Order of Detention

vs.

STEPHEN CARL ALLWINE DOB: 03/04/1973

7624 110th Street S
Cottage Grove, MN 55016

Defendant.

The Complainant submits this complaint to the Court and states that there is probable cause to believe Defendant committed the following offense(s):

COUNT I

Charge: Murder - 2nd Degree -Intentional

Minnesota Statute: 609.19.1(1)

Maximum Sentence: 40 years

Offense Level: Felony

Offense Date (on or about): 11/13/2016

Control #(ICR#): 16118731

Charge Description: cause the death of A.L.A., D.O.B. 12/10/1972 with intent to effect the death of the victim or another, but without premeditation

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Your complainant is a licensed peace officer in the State of Minnesota, and is employed by the Cottage Grove Police Department. In that capacity, your complainant states the following to establish probable cause:

On November 13, 2016 at approximately 7:00 p.m., officers with the Cottage Grove Police Department were dispatched to the residence at 7624 110th Street South, City of Cottage Grove, Washington County, Minnesota on a report of a gunshot wound. Upon arrival, officers observed an adult male, identified as STEPHEN CARL ALLWINE, D.O.B. 3/4/1973, "Defendant" herein, standing in the open garage with his son, J.L.A., D.O.B. 10/24/2007. Defendant stated that his wife, A.L.A., D.O.B. 12/10/1972, "Victim" herein, was in the rear bedroom, that he was uncertain of her injuries and that a nine millimeter firearm had been used. Officers found Victim lying on the bedroom floor near the door and observed pooled blood on the carpeting near her and under her head. Officers observed a nine millimeter Springfield XDS firearm lying on the floor and against the Victim's left forearm/elbow area. The firearm was secured and taken into evidence. Victim was warm to the touch, but officers were unable to locate a pulse. Uncertain of the extent of Victim's injuries, officers moved Victim's head toward her left shoulder, which revealed a bullet exit wound with brain matter and blood under Victim's head. The head was then moved back. It was determined that Victim was deceased. Officers observed a shell casing on the carpet near Victim's right foot. Officers also observed in the kitchen pumpkins roasting in a roaster oven on the counter. The oven was turned on when observed.

Inside the residence, officers located two cellular phones, a black Samsung Galaxy S7 in a black Otterbox case and a silver iPhone 6. Defendant provided officers with the passcode for the Samsung, which he stated was his personal cell phone, and two possible passcodes for the iPhone, which he stated was his work phone. Officer Liermann spoke with Defendant, who stated that he last saw Victim at approximately 5:29 p.m. when he left to go pick up their son, J.L.A., from Victim's parents' home. Defendant stated that he called Victim's parents at approximately 1:54 p.m. to come over and pick up J.L.A. because Defendant needed to get some work done. Defendant stated he works from home downstairs. He stated that when he came upstairs from working, Victim reported that she did not feel well and was lightheaded. Defendant stated that he asked Victim if she wanted to go to the doctor and she stated she did not. Defendant stated he went back downstairs to work and came upstairs at approximately 5:00 p.m. to check on Victim, who told him to stop checking on her, that she was fine and that he did not need to check on her anymore. Defendant stated that he told Victim he was going to pick up J.L.A. from her parents' residence and take him to a class at the Ninja Warrior gym in Woodbury. Defendant stated that he left their residence and called Victim's parents at approximately 5:29 p.m. to let them know he was coming to pick up J.L.A. Defendant stated he then went to the gas station to fill up his vehicle, where he realized he forgot J.L.A.'s shorts for his gym class at home. After he picked up J.L.A., Defendant stated that he then decided to go to Culver's to eat instead of bringing him to the gym. Defendant stated that after they ate, they came home and found Victim lying in the bedroom.

On December 7, 2016, Detective Raymond received information from Opantix, one of Defendant's employers. Detective Raymond learned that Defendant's shift is from 6:00 a.m. to 5:00 p.m. Sunday through Wednesday. On November 13, 2016, Defendant first logged in at 6:24 a.m. and remained logged in until 12:13, when he took his lunch break for 41 minutes and 23 seconds. Opantix reported that Defendant never entered the phone queue to finish his shift and that he did not enter any case updates for November 13, 2016, despite the fact that Defendant works on customer issues and is supposed to log all

of his activity in his case notes. On December 20, 2016, Detective Raymond learned that Defendant's other employer, Cigna, issued Defendant the iPhone 6. Cigna verified that Defendant did not log into work on November 13, 2016.

Victim's parents, C.M.Z. and J.G.Z., responded to the scene. They reported that Victim was right handed, inconsistent with officers' observations that the firearm was found lying next to and against Victim's left forearm/elbow area and also inconsistent with a self inflicted gunshot wound to the right side of her head.

They reported that Victim and Defendant had a different code to enter their garage door because they monitored who was coming and going after Victim received death threats in the spring of 2016. They stated that Victim did not go into great detail about the threats with them, but neither of them had any idea of who would want to harm Victim, as she had no enemies. Victim's father stated that on November 13, 2016, he had gone to Defendant and Victim's residence after lunch. He installed a lock on a dog door and left around 2:00 p.m. He stated that about fifteen minutes later, Defendant called him, asking if he could come back and pick up J.L.A., as he was going to take Victim to Urgent Care. He reported that J.L.A. was standing in the garage when he arrived and Defendant was standing in the doorway.

Sergeant McAlister also responded to the residence and noted that the wood floor outside of the bedroom where Victim was located appeared very clean, while the bedroom carpet appeared dirty with what appeared to be dog hair. Sergeant McAlister observed the wood floor was hazy with some sort of residue. Sergeant McAlister then contacted Minnesota Bureau of Criminal Apprehension ("BCA" herein) Special Agent Michelle Frascone. After Special Agent Frascone arrived and viewed the scene, the Ramsey County Medical Examiner's Office was called to retrieve Victim's body. Special Agent Frascone then mobilized the BCA Crime Scene Team. A search warrant for the residence was applied for and signed by the Honorable Mary E. Hannon, Washington County District Court Judge.

On November 13, 2016, Officer Bushey transported Defendant to the Cottage Grove Police Department for additional information. Upon arrival, Defendant used the restroom under supervision in order to ensure he did not wash his hands. At the Department, Defendant agreed to provide a sample for the completion of a gunshot residue kit as well as a DNA sample via buccal swab; he signed consent forms for both. Defendant signed consent to search forms regarding the Galaxy S7 and the iPhone. Defendant agreed to speak with Detective Raymond. Defendant stated that he awoke on November 13, 2016 at approximately 5:50 a.m. and began working in his office downstairs. He stated he came upstairs for breakfast at approximately 10:00 a.m., saw Victim and J.L.A., and went back downstairs until approximately 1:00/1:15 p.m. to check on Victim. Defendant stated that Victim was not feeling well and that she reported feeling dizzy and groggy. Defendant stated that Victim asked him to call her father to come pick up J.L.A. so he would not have to be alone. Defendant also stated that Victim's father had been to their residence earlier that day to install a dog door. Victim's father picked up J.L.A. and again, Defendant stated that he then asked Victim how she was doing. He stated that Victim reported that she was dizzy, but was fine and was going to lie down. Defendant stated that he continued working and checked on Victim periodically. Defendant stated at one point he heard a thump while Victim went to the bathroom, but she again said she was fine. Defendant stated that he came upstairs at approximately 5:00/5:15 p.m. and noticed that Victim was kneeling by the bed. Defendant stated that he assumed she was praying, which was not unusual. Defendant stated that he then informed Victim that he was going to pick up J.L.A. and bring him to a gym class at Ninja Warrior in Woodbury. Defendant stated before he left he asked Victim how she was feeling and she stated she was feeling okay. Defendant stated he left the residence driving Victim's Toyota Sienna and realized it was low on fuel, so he went to the Super America located at County Road 19 and 70th Street in Cottage Grove. He then picked up J.L.A. from Victim's parents' residence in Woodbury and began traveling to the gym, when he realized they would not have enough time to make it there. Defendant did not mention having forgotten his son's shorts as he had in his first statement. Defendant stated that they then drove home after he had picked up JAL and had had dinner at Culver's. He stated that J.L.A. entered

before him and asked him, "Why is Mommy sitting on the floor?" Defendant stated he told J.L.A. to start getting ready for bed and he went to the bedroom, where he saw Victim lying on the floor and blood. He stated he then called 911.

Defendant verified that they had installed an alarm at the residence after Victim received threats, but they had gotten lax about setting it. Defendant was referencing a time earlier in 2016 when the Federal Bureau of Investigation ("FBI" herein) contacted the Cottage Grove Police Department regarding a murder-for-hire discovery on a part of the internet, not indexed by search engines, and referred to as the "Dark Web." The FBI had tracked activity on the Dark Web that involved an individual attempting to procure a hitman to kill Victim. On June 1, 2016, FBI Special Agent Silkey and Detective Raymond met with Defendant and Victim at their residence and subsequently had Victim come to the Cottage Grove Police Department for further information. Accordingly, Victim was advised to install security measures at her residence and report any suspicious activity. The Cottage Grove Police Department subsequently learned that on June 22, 2016, Defendant applied for a permit to purchase a firearm and received his permit to carry a firearm on August 10, 2016. Defendant purchased the aforementioned Springfield 9mm handgun after August 10, 2016. Defendant denied having any knowledge about hacking or the Dark Web in his statement to police.

Defendant stated that Victim had been more positive lately and that she had recently gotten back into teaching dog agility training. It was verified that Victim owned her own dog agility training company which operated out of the home address. He stated that their family had taken a trip to Germany and that they all slept well there. He also stated that Victim had been having issues with her email. He stated that he was frustrated because he works in IT and works out of his basement office. Defendant denied any knowledge about hacking and that he knows "how things are supposed to work in the legitimate world." Defendant stated he asked a friend who works in computer forensics about Victim's email issues and asked his friend "Kevin" about whether the FBI would do a "deep dive" on their electronic devices, which were taken by the FBI after the Dark Web threats were made. They were subsequently returned.

Detective Raymond then spoke with J.L.A., who reported that earlier in the day, his mother did not feel well and was dizzy, so his father took her to the clinic. He said he went to his grandma and grandpa's until his dad picked him up to go to the Ninja gym. He reported that his dad then said they did not have time to go there and they went to Culver's for dinner. He reported that when he found his mother, he asked his father why she was sleeping on the floor. J.L.A. reported that his father then stated, "She's probably dead," and called 911. He reported that his father told him that there was blood all over and there was a handgun. Defendant consented to J.L.A. providing a DNA sample at this time.

On November 15, 2016, Detective Raymond assisted in the execution of the search warrant on Defendant and Victim's residence. Detective Raymond observed Defendant's basement office contained a large amount of computer equipment, which appeared to be very sophisticated and technologically advanced. Officers also found five additional cellular phones in the home. A silver iPhone 6 in a Body Glove case and an LG VS876 Lucid 3 in a clear case were found in close proximity to Victim in her bedroom. Two inactive cellular phones were found on Defendant's bedroom nightstand. Finally, a Samsung Galaxy 5S was located in Defendant's personal office in the basement. This phone used the same phone number as Defendant's current personal cell phone, the Samsung Galaxy S7, which Defendant began using on November 9, 2016.

On November 16, 2016, three search warrants were presented to and signed by the Honorable Mary E. Hannon: the first for several cellular phones, the second for the residence's video doorbell system and the third for the Comcast/Xfinity home security system. On November 17, 2016, Sergeant McAlister received an email with information related to the family's video doorbell system (the "Ring" system herein). He had requested all video or audio capture from November 12, 2016 and November 13, 2016. The video system filmed the front door area of the house and was triggered by motion. Seventeen files were attached to the email, but no footage was captured on November 13, 2016 prior to the time Victim was found deceased.

Video #6 was recorded on November 12, 2016 until 2:09 p.m. and there is no further recording until November 13, 2016 at 6:32 p.m., which is police activity. Defendant's name is listed on the Ring account, which was created on June 13, 2016. Defendant's email is listed as the primary email on the account. The Ring account also shows that the system was connected to an Android device, which was registered to the account on November 11, 2016. The Android model registered matches the Samsung Galaxy S5 cellular phone found in Defendant's basement office in the execution of the search warrant for the residence. Additionally, a search of this phone revealed that an application for the Ring system was downloaded onto his phone. Also on this phone, Detective Raymond found what appeared to be a "bitwallet" or a "bitcoin" application commonly used for trading or paying in bitcoins. Bitcoin is a currency form used on the Dark Web to pay for illegal services, goods and transactions, as it is largely untraceable back to the seller and buyer.

On November 17, 2016, Sergeant McAlister received a response from Comcast/Xfinity regarding the home security system which recorded the dates/times that the front and garage access doors are opened.. He learned that on November 13, 2016, the only ingress to and egress from the home occurred at (1) 1:47 and 2:02 p.m., when Victim's father picked up J.L.A., (2) 5:26 p.m. when Defendant left to pick up J.L.A., (3) 6:58 p.m., when Defendant and J.L.A. arrived home, (4) 7:06 p.m., when Defendant and J.L.A. exited the home prior to police arrival, and (5) 7:08 p.m., police arrival. This confirms that after Defendant left the residence at 5:26 p.m., no other individual entered the residence through the three monitored entry points until Defendant and J.L.A. arrived home to find Victim deceased. Most notably, the search warrant return also revealed that after Victim's father left the residence at 2:02 p.m., the service door was opened at 2:40 p.m., 2:42 p.m., and 4:40 p.m. In his statement to Detective Raymond, Defendant stated that after J.L.A. was picked up earlier around 2:00 p.m., he was working in the basement until he left at 5:26 p.m.

On November 29, 2016, Sergeant McAlister received a telephone call and email from the RJ Lee Group, the company the Cottage Grove Police Department uses to examine their gun shot residue kits. Sergeant McAlister learned that Defendant's sample (#10383986) revealed that Defendant's right hand contained a particle characteristic of gun shot residue. Detective Raymond confirmed while watching Defendant sign consent forms on November 13, 2016, that Defendant is right handed.

On November 30, 2016, Sergeant McAlister met with BCA Special Agent Joe O'Brien regarding digital evidence he had obtained from the FBI. The evidence included information regarding a Dark Web website called "Besa Mafia," where individuals solicit murders and assaults for hire. Besa Mafia had been hacked at some point and posts made on open source websites revealed lists of individuals who had purportedly contacted the Besa Mafia for its services. As a result of this hack, the FBI became aware of a conversation on Besa Mafia initiated by an individual with the username "dogdaygod" and email address "dogdaygod@hmamail.com" ("dogdaygod" herein). In a review of the following evidence obtained by the FBI, the Cottage Grove Police Department and BCA mapped out the following timeline. It should be noted that Defendant was not truthful with law enforcement regarding his activity on the internet, as he denied knowing about hacking or the Dark Web, yet information gleaned from examining Defendant's computer revealed that Defendant had accessed the Dark Web as early as 2014.

- On February 14, 2016, dogdaygod opened his/her account on reddit.com. The IP address used by dogdaygod is a known TOR exit out of France; TOR exits are used obtain access to the Dark Web. Dogdaydog immediately inquired on reddit.com that he/she was new to the markets and asked for tips on how to identify law enforcement posing as sellers.

- On February 15, 2016, an email was sent from dogdaygod@hmamail.com to the Besa Mafia website inquiring as to the cost of a "hit." Besa Mafia replied that the cost was \$5,000.00, that bitcoins could be used as payment and that coinbase.com and localbitcoins.com could be used to obtain bitcoins for the purchase of the hit. Dogdaygod ultimately inquired as to how much it would cost to kill Victim and to make it

look like a car accident. Besa Mafia stated that would cost \$6,000.00.

- On February 16, 2016, several cookies were installed on Defendant's Galaxy S5 from coindesk.com, btc-e.com and wemineltc.com, bitcoin websites. Later that day, dogdaygod posted on the Besa Mafia website that the "target" will be traveling to Moline, Illinois in March and asked if this will work. Besa Mafia confirmed that the hit can be done at that time and provided details as to different kind of hits and their associated costs.

- On March 4, 2016, Defendant received a verification token from localbitcoins.com on his Samsung Galaxy S5.

- Between February 29, 2016 and March 5, 2016, dogdaygod discussed on the Besa Mafia website that they "have the bitcoins now." They also discuss a website called "Bitrated" and suggests that a way to launder bitcoins for assassinations would be to claim to be using the bitcoins to purchase "training or consulting or purchasing a car." The Besa Mafia website replies to this by suggesting that a bitcoin escrow service should be used to launder the bitcoins. Besa Mafia confirmed the original plan and stated that the hitman will have his gun with him, because in the event that Victim does not die in the car crash, the hitman will shoot her dead.

- On March 6, 2016, dogdaygod posted on the Besa Mafia website that "she" (dogdaygod purports to be a female) needs "this bitch dead" and confirmed that Victim will be traveling to Moline, Illinois with a companion. Dogdaygod stated that they do not care if Victim's companion gets killed in the process. The Besa Mafia website replies that they have assigned a hit man and will perform the murder during the evening of March 19 or March 20, 2016. Investigation revealed that Victim had indeed traveled to Moline, Illinois during this time for a dog training competition.

- On March 7, 2016, Defendant contacted the Cottage Grove Police Department to report that he had been defrauded in a bitcoin transaction related to an email he had received on March 3, 2016 from an untraceable "guerrillamail.com" address. The email references Cisco training and test preparation materials for \$6,000.00 in bitcoins, which Defendant admitted he tried to purchase but never received from an individual named "Mark," and at some point became suspicious the activity was fraudulent. Law enforcement observed that "Mark" emailed Defendant about the materials, their cost and about how if Defendant is not interested, he will sell it on eBay; however, they observed that in a search of Defendant's outgoing email, at no point before or after "Mark's" email did Defendant communicate with or respond to "Mark."

- In subsequent conversations on Besa Mafia during this time, dogdaygod disclosed very detailed facts about Victim's family, including schedules and where Victim will be on certain days, indicating that dogdaygod is an individual close to Victim.

- On March 20, 2016, Besa Mafia informed dogdaygod that their hitman followed Victim, but did not yet get a chance to kill her. In prior discussion, Besa Mafia told dogdaygod that the hitman would wait for Victim at the airport, tail her in a slow-moving car and cause a car accident to kill her. Besa Mafia then told dogdaygod that they recommend the use of a sniper, which costs an additional ten bitcoins, or approximately \$12,000.00. Dogdaygod replied that while he/she did not have the additional bitcoins on hand, if the killing could not be completed in Moline, that Victim was going to Atlanta in a few weeks and the job could be done then. It was ultimately decided between dogdaygod and Besa Mafia that Victim would be killed at her home and the house would be burned afterward. Besa Mafia stated that with the additional ten bitcoin cost, the plan had a 100% success rate. Dogdaygod agreed to provide the money by the next day.

- On March 22, 2016, dogdaygod told Besa Mafia that when his computer screen refreshed, it provided him/her with the wrong bitcoin address where he/she had sent the additional funds. Dogdaygod asked if Besa Mafia was able to match it to the address the funds should have gone. Dogdaygod provided the address 1FUZ1IECCNHN2KW8MUXHZWOMBBW1TCFVIHB. Investigation revealed that bitcoin addresses are considered unique to each transaction. During computer forensics search of Defendant's computer, this specific bitcoin wallet address was found on a backed up deleted file. The file was originally on Defendant's phone, but was transferred to his computer during an iPhone backup. This specific bitcoin wallet address is the exact same address provided by dogdaygod, thus linking Defendant directly to dogdaygod.
- When Victim was not killed and the home not burned down, Besa Mafia told dogdaygod that the hitman was stopped by local police for driving a stolen vehicle and taken to jail prior the hit. Sergeant McAlister noted that during this time, no one was apprehended in Minnesota and western Wisconsin and was arrested in a stolen vehicle and in possession of a gun. Besa Mafia continued to solicit money from dogdaygod, continually delaying the hit.
- On May 18, 2016, an account was created on DreamMarket Forum, another Dark Web website, with the username dogdaygod. The post inquired about a partner for a job, needing to stay anonymous and being paid by bitcoin. Dogdaygod also posted asking, "Does anyone have Scopolomine for sale?" with the topic of the thread labeled, "Looking for drug dealer physically located in Minneapolis area by dogdaygod." Throughout this time, several cookies for reddit and several Tors, or search engines used to search the Dark Web, are installed on Defendant's phone.
- Investigation revealed that on July 23, 2016, in a forensic search of Defendant's computer, the website www.radaris.com was accessed on this day. Forensic evidence further revealed that on Defendant's computer on this day, Victim's and Victim's family members' names were searched.
- On July 24, 2016 at approximately 1:56 p.m., Victim received an email via a Tor, from an anonymous email address, jane@gmail.com, which stated, "[Victim], I still blame you for my life falling apart. I do not know how a fat bitch like you got to my husband, but because of you he left, and my life has become shit. I am sending you this email, because it looks like you already know about me. I see that you have put up a security system now, and I have been informed by people on the Internet that the police were snooping around my earlier emails. I have been assured that the emails are untraceable and they will not find me, but I cannot attack you directly with them watching. Here is what is going to happen. Since I cannot get to you, I will come after everything else that you love. I know about your son, your husband, and your business, but thanks to the internet (www.radaris.com) I see you have a mother and father in Woodbury (7600 Military Rd), a brother in St. Paul, and a sister in Yardley, PA. I have been busy researching topics on the internet, and have found that if you inject water into the brake line, then you will cause them to fail. What would happen if the brakes on the truck failed when your husband was hauling a heavy load? I found how to blow up a gas meter and make it look like an accident. I know that the meter on your house and on your business are on the east side, and the meter on your parents' house is on the south side. I am still watching you and your family. While, I did not see your son this week, I saw last friday [sic] he was wearing a bright pink shirt. I see that you moved the RV. Here is how you can save your family. Commit suicide. If you do not, then you will slowly see things taken away from you, and each time you will know that you could have stopped it, which will eat you apart from the inside. By the time I am done you will want to end it anyway, so why not do it now and save them. Based on lasthope.com the best ways to do it are shotgun to the head (which you might not have) cyanide (which you probably do not have) gunshot to the head (which you might not have) shotgun to the chest (which you might not have) explosives (which you probably do not have) hit by train jump from height (a lot of bridges around) hanging household toxins (anti-freeze, ammonia and bleach) inhaling gas (carbon monoxide) slitting wrist or throat. I know about this website, because I have thought of this option many times. Remember if you do not get it right the first time, then you will likely be committed

for mental health issues, and you will lose your business and possibly your family. so [sic] I would pick a reliable method. I think it is an easy choice. 1 life to save 6 lives. Your family does not need you, but you can save them. DO NOT tell ANYONE about this email or this deal is OFF and I will come after your family. You have seen that the police are not able to track my earlier emails, but I was informed of them searching. They will not be able to track this either, but I will know if they look into it. Unless you are a heartless, selfish bitch then I expect to see your obituary in the paper in the next couple weeks." Because this activity was done via the Dark Web and possibly an unidentifiable router referred to as an "onion" router, IP addresses linking the email to the anonymous sender could not be traced.

· On July 31, 2016 at 8:58 a.m., Victim received another email from jane@gmail.com, which stated, "Amy, your family is in danger. Last Sunday you received an email with the solution to this problem, and you have not done anything about it yet. Are you so selfish that you will put your families lives at risk? If you did not see the email then you check your junk mail soon."

· During this time, Defendant inquired on reddit.com about "Tails," which is an operating system used to remove computer artifacts and searches, designed to enable the user to navigate the internet anonymously and privately. There is also evidence that in July 2016, Defendant's computer was used to access guerillamail.

Forensic extraction was done on all seized cellular phones. The iPhone 6S (Item #2) revealed a contact for "Michelle" at a phone number. Defendant admitted to law enforcement that he had been in a relationship with a "Michelle" from the "western metro Twin Cities area." Special Agent Michelle Frascone determined that "Michelle" was M.W., D.O.B. 10/23/1970. M.W. agreed to speak with law enforcement. She stated that she and Defendant had an affair during his marriage to Victim, meeting on the website Ashley Madison, a website for married people seeking extramarital affairs. She stated that the two had an intimate relationship for several months during which time they took out-of-town trips together, as well as spent time together locally. She admitted that their affair was sexual in nature and provided photographs of the two of them together in which they are hugging and kissing. M.W. stated that at times, Defendant wanted her to come to his house when Victim was out of town, but told her that cameras were up and that he needed her to come through the back way to avoid detection. Photographs were provided that were dated December 11, 12 and 15, 2015. M.W. stated that the romance "fizzled" in February 2016. M.W. stated that if the murder-for-hire plot was true, that Defendant was smart enough to pull it off.

It was subsequently discovered that Defendant had gone out with an individual identified as A.H., who also agreed to speak with law enforcement. A.H. stated that she too met Defendant on Ashley Madison; Defendant reached out to her and asked her on a date in October 2015. A.H. stated that they met for dinner at Legend's Golf Course in Prior Lake and that they ended the evening with a kiss.

On December 19, 2016, the BCA tested several items for DNA. On a blue washcloth taken from the laundry room, DNA was found and both Defendant and Victim cannot be excluded as contributors. On the pistol trigger, the slide release and the slide, DNA was found and a mixture of DNA from Defendant and Victim cannot be excluded as contributors. On the pistol grips, DNA was found. Victim was the major DNA contributor, but Defendant cannot be excluded as a contributor.

In further review of the residence, BCA and local law enforcement noted no forced entry into the home. Outside the bedroom where Victim was found, nine faintly visible smear marks were observed on the hardwood floor, as noted previously by Sergeant McAlister. There is a void between these smear marks and the blood staining the floor next to and under the Victim's head in the bedroom. These nine bloodstains were present in the hallway floor and lower north wall outside the master bedroom. BCA agents classified

these bloodstains as consistent with blood spatter, possibly from a wiping mechanism. Agents observed a large area on the hardwood floor that had blood on it, but had been cleaned. Human blood was found in the tongue-and-groove portions of several floorboards; that floor was lifted and the blood present was confirmed by DNA tests to be Victim's. Agents also found nine separate areas of visible transfer stains and bloodlike substance present on the floor between the master bedroom and laundry room, darkest near the bedroom and progressively lighter near the laundry room. These appeared to be bloody footprints and were only visible when the crime scene team used luminol and not to the naked eye. This area appeared to have been the site of an attempted cleanup. Blood was observed on both sides of the bedroom door and a transfer stain was present on the hallway side of the door. Transfer and spatter stains were found on the bedroom side of the door. A drip pattern of blood was located in the bedroom where Victim was found, consistent with a source of blood from Victim that was elevated above the carpet to create that pattern. The entire surface of the main floor was chemically processed to enhance latent blood residue. It was determined that blood was present in a large pool outside of the master bedroom; there were footprints consistent with a person walking back and forth with blood on their feet found throughout the residence including outside the master bedroom, between the couch and kitchen island, between the dining room table and basement door, in the hallway, in the main floor bathroom, in J.L.A.'s bedroom and in the laundry room. Additionally, the bloody footprints were not found near any access point to the residence except the garage access door.

In an interview on November 15, 2016 with his attorney, Special Agent Frascone and Special Agent Chris Olson, Defendant was specifically asked about blood on the wooden floor outside the bedroom that appeared to have been cleaned up. Defendant stated he had no information about this. He also stated that no one had been previously injured in the home and had no explanation about why human blood on the floor of the home would have been cleaned up. He also stated that Victim had a \$700,000.00 insurance policy through Northwest Mutual Insurance.

Further investigation noted that after dogdaygod's attempts to have Victim killed via the Besa Mafia hitman, dogdaygod inquired about the purchase of scopolamine on the Dark Web's Dream Market Forum. Scopolamine is a drug used in the United States most commonly via a transdermal patch. It is primarily used to treat nausea or motion sickness when recovering from surgery. It is nicknamed the "devil's drug" and is known to erase a person's memory, rendering them incapable of exercising their free will. The drug is made into an odorless and tasteless powder that quickly dissolves in liquids and is commonly put into drinks or sprinkled on food. Law enforcement requested that the Ramsey County Medical Examiner's Office test Victim's blood specifically for scopolamine and it was revealed that Victim's blood contained over forty five times higher concentration of the drug than what it would be after a prescribed therapeutic dose. It was confirmed that Victim was not ever prescribed scopolamine. It should be noted that a search of Victim's iPhone 6 revealed that on November 13, 2016, it was last used to search "Vertigo-Wikipedia" at approximately 2:01 p.m.

The Ramsey County Medical Examiner performed Victim's autopsy, which confirmed she had died due to the gunshot wound. The wound tract is from slightly back to front, right to left and slightly downward when the body is viewed in the anatomical position. No gunpowder stippling was noted on the skin around the entry wound, which is correlated to the distance of the shot; the closer the shot is to the skin the more stippling there is. Victim's hands revealed no soot, no gunpowder stippling, no unburned gunpowder stippling, and no blood on either hand. These findings are inconsistent with a self-inflicted gunshot wound to the head. The medical examiner estimates Victim's time of death at around 3:00 p.m. on November 13, 2016.

PLEASE TAKE NOTICE: YOU MUST APPEAR FOR EVERY COURT HEARING REGARDING THIS CASE. FAILURE TO APPEAR FOR COURT IS A CRIMINAL OFFENSE AND MAY RESULT IN ADDITIONAL CRIMINAL CHARGES BEING IMPOSED AND PUNISHED AS PROVIDED IN MINNESOTA

STATUTES SECTION 609.49.

SIGNATURES AND APPROVALS

Complainant requests that Defendant, subject to bail or conditions of release, be:
(1) arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or
(2) detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.

Complainant declares under penalty of perjury that everything stated in this document is true and correct. Minn. Stat. § 358.116; Minn. R. Crim. P. 2.01, subds. 1, 2.

Complainant

Pete Koerner
Captain
12800 Ravine Parkway South
Parkway S
Cottage Grove, MN 55016
Badge: 4303

Electronically Signed:
01/17/2017 04:51 PM
Washington County, minnesota

Being authorized to prosecute the offenses charged, I approve this complaint.

Prosecuting Attorney

Fred A. Fink Jr
Assistant Washington County
Attorney
PO Box 6
15015 62nd Street North
Stillwater, MN 55082
(651) 430-6115

Electronically Signed:
01/17/2017 04:35 PM

FINDING OF PROBABLE CAUSE

From the above sworn facts, and any supporting affidavits or supplemental sworn testimony, I, the Issuing Officer, have determined that probable cause exists to support, subject to bail or conditions of release where applicable, Defendant's arrest or other lawful steps be taken to obtain Defendant's appearance in court, or Defendant's detention, if already in custody, pending further proceedings. Defendant is therefore charged with the above-stated offense(s).

SUMMONS

THEREFORE YOU, THE DEFENDANT, ARE SUMMONED to appear on _____, _____ at _____ AM/PM before the above-named court at 14949 62nd Street N PO Box 3802, Stillwater, MN 55082-3802 to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

WARRANT

To the Sheriff of the above-named county; or other person authorized to execute this warrant: I order, in the name of the State of Minnesota, that the Defendant be apprehended and arrested without delay and brought promptly before the court (if in session), and if not, before a Judge or Judicial Officer of such court without unnecessary delay, and in any event not later than 36 hours after the arrest or as soon as such Judge or Judicial Officer is available to be dealt with according to law.

Execute in MN Only

Execute Nationwide

Execute in Border States

ORDER OF DETENTION

Since the Defendant is already in custody, I order, subject to bail or conditions of release, that the Defendant continue to be detained pending further proceedings.

Bail: \$
Conditions of Release:

This complaint, duly subscribed and sworn to or signed under penalty of perjury, is issued by the undersigned Judicial Officer as of the following date: January 18, 2017.

Judicial Officer Susan R Miles
District Court Judge

Electronically Signed: 01/18/2017 09:49 AM

Sworn testimony has been given before the Judicial Officer by the following witnesses:

**COUNTY OF WASHINGTON
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Stephen Carl Allwine

Defendant

*LAW ENFORCEMENT OFFICER RETURN OF SERVICE
I hereby Certify and Return that I have served a copy of this Order of
Detention upon the Defendant herein named.*

Signature of Authorized Service Agent: