

**IN THE IOWA DISTRICT COURT IN AND FOR
DELAWARE COUNTY**

FILED
DATE: 2-28-19

This Complaint and Affidavit is to be:

- Filled with Court Clerk (cc: CA)
- Submitted to County Attorney
- Filled with JCO - Defendant is a Juvenile

Agency Case Number: **18010035**

Arrest Date: _____

THE STATE OF IOWA

VS

OFFENDER

Last MULLIS		First TODD		Middle MICHAEL		Suffix	
Address 1722 255TH AVE				City EARLVILLE		State IA	Zip Code 52041
DL# 857ZZ9951	State IA	DL Class A	DL Endorsements		DL Restrictions		
Date of Birth 07/17/1976	Gender MALE	Race WHITE - W		Ethnicity NOT OF HISPANIC ORIGIN - N			
Height 6' 00"	Weight 205 LBS	Eye Color GREEN - GRN		Hair Color BROWN - BRO			

OFFENSE

State <input checked="" type="checkbox"/>	County <input type="checkbox"/>	Local <input type="checkbox"/>	Code Section 707.2(1)(A)	Crime Description MURDER IN THE 1ST DEGREE			Speed	in	Zone
Class FELA		Serious P.I. <input type="checkbox"/>		Fatal Accident <input type="checkbox"/>		Civil Damage Assessment <input type="checkbox"/>		Other <input type="checkbox"/>	
Location Type 20 - RESIDENCE/HOME									
Literal Description D013/255TH AVE									
Address 1722 255TH AVE				City EARLVILLE			State IA	Zip Code 52041	
Is Date and Time of Incident Known? YES		Incident Date or Low Range 11/10/2018		Upper Date Range		Incident Time or Low Range 10:12		Upper Time Range	

STATUS OF OFFENDER/JUVENILE

<input type="checkbox"/> TAKEN INTO CUSTODY	CUSTODY	<input type="checkbox"/> SUMMONS TO APPEAR (Citation Issued)
<input checked="" type="checkbox"/> WARRANT REQUESTED	<input type="checkbox"/> NO CONTACT ORDER REQUESTED	<input type="checkbox"/> RELEASED TO PARENT/GUARDIAN

NARRATIVE

Narrative of Offense Committed

On or about the above stated date and time, the Defendant did having malice aforethought, willfully, deliberately, and with premeditation kill Amy L. Mullis D.O.B: 01-23-1979.

VICTIM INFORMATION (Optionally displayed, especially if NCO is requested)

Last MULLIS		First AMY		Middle LYNN		Suffix	
Business/Organization/State/County/Municipality Name							
Address 1722 255TH AVE				City EARLVILLE		State IA	Zip 52041

AFFIDAVIT

STATE OF IOWA, DELAWARE COUNTY

I, the undersigned, being duly sworn, state that all facts contained in this Complaint and Affidavit, known by me or told to me by other reliable persons form the basis for my belief that the defendant committed this crime

State all facts and persons relied upon supporting elements of alleged crime

See attached Affidavit.



HEMESATH, TRAVIS 28-10


Signature of Complainant or Officer, Officer Name & Number

GENERAL PROBABLE CAUSE

Defendant Implicated 03 - ADMISSION/STATEMENTS, 09 - NEAR SCENE OF CRIME, 10 - POSSESSION/DISPLAY/USE OF DANGEROUS WEAPONS, 14 - OTHER PHYSICAL EVIDENCE		
Operating Motor Vehicle in County	Other Physical Evidence SEE AFFIDAVIT	Attempted To Inflict Injury

STATE OF IOWA, DELAWARE COUNTY



Subscribed and sworn to before me by the person(s) signing the Complaint and Affidavit(s) on 02/28/2019		Signature of Verifying Party
Notary Name	JUDY A LEE	
Commission Number	197867	
My Commission Expires	08/12/2019	
		<input type="checkbox"/> Peace Officer <input checked="" type="checkbox"/> Notary <input type="checkbox"/> Prosecuting Attorney

AFFIDAVIT

STATE OF IOWA)
) ss.
COUNTY OF DELAWARE)

Your affiant, Travis D. Hemesath, an Investigator for the Delaware County Sheriff's Office, being duly sworn, does hereby depose and state that:

Your affiant has been certified as a Police Officer since April 2008. Your affiant is currently assigned as a Patrol Officer/ Investigator for the Delaware County Sheriff's Office. Your affiant's current duty status is full-time assignment to Investigations and Patrol.

Your affiant is a certified peace officer in Iowa. I have received training through the Iowa Law Enforcement Academy and at subsequent schools concerning investigations, narcotic interdiction and identification of narcotics.

Your affiant's specified training is described as the following: Level one, two and three High Risk Entry Trainings, Roadside Interviews, Drug Interdiction, Patrol Tactics for the Rural Officer, Taser & Firearm Certified, Emergency Care Provider, Crime Scene Investigation, Interview and Interrogation and Clandestine Laboratory Certified. Your affiant also received two years of education with an emphasis in Law Enforcement and received an AAS Degree in Police Science.

Your affiant conducted an investigation and received the following information:

Todd Mullis and Amy Mullis were married in approximately 2004. They were the biological parents of TRM (13 years old); TPM (11 years old); and WLM (8 years old). Since their marriage, Todd and Amy and their children have only lived at 1722 255th Ave Earlville, Iowa 52041, a house located in rural Delaware County.

On November 10, 2018, at approximately 12:05 PM, the Delaware County Dispatch Center received a 911 call from Todd in reference to his wife Amy being unresponsive.

Todd stated that he, Amy and their 13-year-old son TRM were working in the north hog building that day. In addition to the hog building several other

buildings are located in the immediate area, including: a second hog building, the Mullis' house, a red shed, and a large outbuilding (referred to as the shop). Todd explained that Amy had surgery a couple days prior and that this was her first day out of the house. Todd stated that Amy was helping in the hog barn and was cleaning light bulbs/fixtures. Todd stated that he had observed Amy while working and she appeared to have dizzy spells. Todd stated he then instructed Amy to stop working and go to the house to rest. Todd stated that he had asked Amy to go to the nearby shed to grab a pet carrier before she went into the house and to set it by the shop to put kittens in it later. Todd stated that he then continued working in the hog barn with his son TRM.

Todd stated that sometime later, he and TRM had gone to the front office of the hog building to get a drink. Todd stated he looked outside and didn't see the pet carrier in front of the shop where he had instructed Amy to put it. Todd stated he instructed TRM to go check on Amy and see what she was doing. Todd stated TRM left the hog building as instructed and went to the shed.

Todd stated he was then standing outside of the hog building in the farm yard and heard TRM yell for him. Todd stated he ran the short distance to the shed and observed Amy lying in a crouched position just inside the doorway with a corn rake impaled in her back. Todd stated he attempted to take Amy out of the building, but the corn rake that was lodged in her back was hitting the fertilizer crates. Todd stated that he then laid Amy down; pulled the corn rake out of her back; and picked her up and carried her out of the shed. Todd stated he placed Amy in his pickup with TRM and drove towards Manchester Hospital. Todd called 911 on the way to the hospital. Midway to the hospital emergency medical services reached Todd and moved Amy from his pickup to an ambulance. Amy was then transported to the Regional Medical Center in Manchester and was pronounced dead.

That same day, Todd was interviewed by law enforcement. Todd stated he didn't know how Amy sustained her fatal injuries on this day. Todd also stated that he and Amy have had arguments between one another in the past. Todd was asked in an interview about the positioning of the four-tine corn rake that was in the back of Amy. Todd stated that he didn't think all of the tines were in Amy's back when he had removed the 4-tine rake.

On November 12, 2018, your affiant was present for the autopsy of Amy at the State Medical Examiner's Office in Ankeny, Iowa. Your affiant observed the autopsy and the injuries Amy had sustained. The State Medical Examiner's Office

stated that the injuries Amy sustained are not consistent with falling onto the corn rake as described by Todd. Your affiant observed six puncture wounds that had entered Amy's body. Your affiant knows that the corn rake only has four tines. Your affiant also knows that two of the six puncture wounds were at an upward angle and four of the six puncture wounds were at a downward angle. Your affiant knows that the State Medical Examiner's Office in Ankeny, Iowa, ruled the death of Amy as a Homicide.

On November 16, 2018, law enforcement re-interviewed Todd. During the interview, Todd told law enforcement that in approximately 2013 Amy had an affair with another man. Todd said his son TRM had learned of the affair and the two of them (Todd and TRM) had grown closer because of the incident. Todd said the affair in approximately 2013 had devastated him and he agreed it had shattered his trust of Amy. Todd was asked by law enforcement if he ever confronted Amy about another affair at any point and he said, "No."

Although he had initially denied it, after further questioning by law enforcement Todd admitted he had confronted Amy a second time about the possibility of her having an affair. Todd told law enforcement around July of 2018, he reviewed his cell phone billing statement and discovered a large number of text messages being sent and received between Amy and a man known to [REDACTED]. Todd said he confronted both Amy and the man in the same timeframe and they both denied being involved in a relationship. Todd said he also called the man's wife and she denied any knowledge of her husband having an affair with Amy. Todd told law enforcement following his conversations with Amy, the man, and the man's wife, he believed them that there was not a relationship. Todd said he never had any further conversations with Amy or the man about the affair. Todd said after he confronted them both it was never discussed again and the thought of them having an affair was put to rest in his mind.

Law enforcement asked Todd to describe his marriage at the time of Amy's homicide. Todd said it was a tight relationship and the communication between he and Amy was great and they were always together right up until the day of her death. Todd described his relationship with Amy at the time of her death as good. Todd said he and Amy did not argue or fight.

During the course of the investigation, law enforcement learned that Amy did enter into a romantic relationship in 2018. The man Amy was involved with told law enforcement that the two of them became involved in approximately May of 2018. He said the relationship continued until the week of Amy's death. The

man said he last saw Amy on the Monday prior to her homicide (referring to November 5, 2018). The man said Amy had confided in him during the summer of 2018 that she wanted to leave Todd, but she was scared to death of Todd. Amy specifically told the man, "If he catches me, he might make me disappear." The man told law enforcement he understood Amy to be telling him if Todd were to verify she was having an affair he would make her leave or kill her. The man said in July of 2018, Todd confronted both he and Amy and asked if they were involved and they denied it. The man said several days after being confronted, Amy explained to him that Todd was now reviewing her cell phone usage and it was no longer safe for them to communicate via text messaging. The man said he feared for his safety if Todd ever found out about his relationship with Amy.

During the course of the investigation, law enforcement learned Todd had not slept in the same bed as Amy for the five months prior to her homicide. Law enforcement learned Todd and Amy had not been getting along during that time frame. During the investigation, law enforcement viewed a text message from Amy to a friend several months prior to her homicide where Amy had commented that things were tense at the house. Law enforcement then viewed another text message sent to the same friend by Amy at 8:11 AM on the morning of her homicide in which she stated to the friend, "...Still very tense around here. Just not sure of anything anymore."

Following Amy's homicide, your affiant and law enforcement performed several interviews with close friends and relatives of Amy. Your affiant learned through these interviews that Amy and Todd had been having marital problems for several years. Your affiant learned that Amy had made statements on several occasions to close friends through text message, phone calls and in person that she felt Todd would kill her if he found out that she was having an affair with another man and wanted to divorce him. Your affiant also learned through interviews with close friends and relatives of Amy that Todd would contact a few of them and speak about Amy and his relationship and his frustrations with Amy.

One of Amy's friends that had been close to her for over 12 years told law enforcement that when Amy went to the local Wal-Mart to shop Todd would require her to document and notify him when she went and when she returned. The friend said if she had lunch with Amy, Todd sent text messages to Amy asking what time she had left and when she was returning. The friend said she was aware that Amy had been involved in an affair in 2018 and had voiced her concerns to Amy that Todd would kill her if he found out. The friend said in the several months leading up to her homicide, Amy had discussed with her about leaving

Todd and that she felt trapped and like a prisoner. The friend said near the end of August of 2018, she had had a phone conversation with Amy in which Amy told the friend she feared Todd would kill her and that if she came up missing the friend should instruct people to look for her body in a wooded area she and Todd had recently purchased. Amy told the friend if she (Amy) was found dead, "You'll know Todd did something to me."

Law Enforcement interviewed another friend of Amy. The friend stated she had a conversation with Amy prior to her homicide. The friend stated that Amy had told them that Todd would kill her and throw her to the pigs if he ever found out that she was having an affair. The friend also stated that Amy was given a nickname and that Amy was called the "POT Wife" meaning "Prisoner of Todd." The friend stated that Amy retained this nickname for some time while she was alive.

Law enforcement interviewed another friend of Amy's for over 12 years. The friend stated Amy had shared with her that she was very unhappy in her marriage to Todd. Amy talked with the friend about her leaving Todd. The friend said she had recent concerns that Todd may harm Amy and had specifically asked Amy if she felt safe with Todd. The friend had offered to help Amy leave Todd and get to a safe place physically.

Your affiant also spoke with another close friend of Amy's. The friend stated that she and Amy were close friends. The friend stated that Amy and they would exchange text messages and phone calls on a consistent basis. The friend stated that Amy had expressed to her in a serious one-on-one conversation that she was scared that Todd was going to kill her if she would leave him and if he would find out about her having an affair. The friend stated that this conversation was very emotional for both of them.

Law Enforcement had also spoken with another friend of both Todd & Amy. The friend stated that they have been friends with Amy for 3-4 years and were close friends within the last year. The friend stated that they have known Todd their whole life. The friend stated that one morning they had contacted Amy and that Amy was screaming and crying. The friend stated that Amy had told them that Todd had found out that she was having an affair and that her minor child was crying and didn't want to get onto the bus because they didn't know if Amy would still be there when they got home. The friend stated that this conversation occurred the week before October 22, 2018. The friend stated that Amy was very upset and yelling when they spoke.

Law Enforcement interviewed another friend of both Amy and Todd. The friend stated that after Amy's homicide Todd had visited their home. The friend stated that they and Todd had conversation and that Todd had stated, "You really have to watch what you text on your phone because it could come back to bite you." Todd also stated, "You have to be careful of what you put on your cellphone." The friend had asked Todd what he meant. Todd had replied to the friend, "Oh well. You know if you write something like, 'I wish you were dead' or 'It would be so easy to have you killed or have you dead.'" Todd also stated that a person should be careful about telling someone how easy it would be to push them off a cliff when they are walking together. Todd had then told the friend that law enforcement had seized his cellphone.

Law Enforcement interviewed [REDACTED]. [REDACTED] is Amy's brother. [REDACTED] stated he had a conversation with Amy about her leaving Todd. [REDACTED] stated he had stored furniture for Amy and that the two of them had planned for the furniture to be available for her once she moved out and left Todd. [REDACTED] said the two of them had planned for Amy to find a new place to live and use the furniture there. [REDACTED] stated this conversation occurred just months prior to Amy's homicide.

Your affiant also knows that Todd had made a comment to [REDACTED], Amy's step mother that he "wasn't going to lose the farm over this," referencing the affair. Your affiant also learned from a close friend of Amy that she and Amy had a conversation in the recent past which included a statement from Amy that if she were to leave Todd that she would get two million dollars from the trust that was in place and half of the farm ground.

During the course of the investigation, law enforcement seized an iPad at the Mullis property. Law enforcement spoke to Todd about the iPad and he stated that he was the owner of the iPad and the sole user of it. When asked by law enforcement Todd volunteered the password for the iPad that he had put in place. During the course of the investigation, it was determined that Todd used a personal Gmail account specifically "[REDACTED]@gmail.com" in connection with the iPad. The Gmail records associated with the account were obtained by law enforcement and reviewed. Four days prior to Amy's homicide (on November 6, 2018), the Gmail account associated with Todd and his iPad searched the internet for "organs in the body" and visited the following websites: Wikipedia.com to view "Organs_(anatomy); and sciencetrends.com to view "body-organs-maps-and-diagrams". On May 10, 2018, the same Gmail account associated with Todd and

his iPad searched the internet for “killing unfaithful women” and “what happens to cheaters in history” and “what happened to cheating spouses in historic Aztec tribes”. On January 8, 2018, the same Gmail account associated with Todd and his iPad searched the internet for “once you hunt man you will always feel the thirst”. On January 8, 2018, the same Gmail account associated with Todd and his iPad searched the internet for “thrill of the kill”. On January 8, 2018, the same Gmail account associated with Todd and his iPad searched the internet for “famous quote no thrill like that of hunting man”.

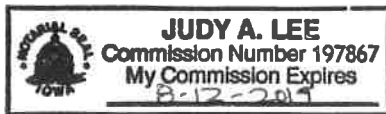
I CERTIFY UNDER PENALTY OF PURGERY AND PURSUANT TO THE LAWS OF THE STATE OF IOWA THAT THE PRECEEDING IS TRUE AND CORRECT.

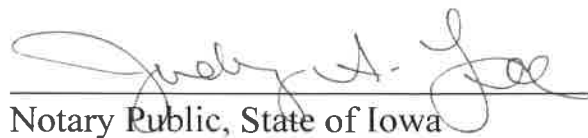
INV. Deputy Travis Hemesath # 28-10



DATE: 2-28-2019

Subscribed and sworn to before me by INV. Deputy Travis Hemesath 28-10 on this 28 day of February, 2019.




Notary Public, State of Iowa