

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

Bradley A. Dunlap,

Civil No. 4-96-1035

Plaintiff,

-vs-

**AFFIDAVIT
OF
DAVID VOSS**

Chubb Life Insurance
Company of America,

Defendant and
Third-Party Plaintiff,

-vs-

Donn P. Barber, personal
representative of the Estate of
Anne L. Dunlap,

Third-Party Defendant

STATE OF MINNESOTA)
)ss.
COUNTY OF HENNEPIN)

DAVID VOSS, being first duly sworn on oath, deposes and states as follows:

1. I am a sergeant in the Homicide Division of the Minneapolis Police Department and I have had primary responsibility for the investigation of the homicide of Anne Dunlap.

2. Bradley Dunlap has been the only plausible suspect in the Anne Dunlap homicide since January 1, 1996 when he subjected himself to a video taped interview at Minneapolis Police Department headquarters. It was Mr. Dunlap's conduct during this video taped interview which prompted me to consider him as a suspect in the homicide.

(22)

FILED MAY 15 1997
FRANCIS E. DOSAL, CLERK
JUDGMENT ENTS: _____
DEPUTY CLERK dl

3. After extensive investigation, Bradley Dunlap remains the only plausible suspect in the Anne Dunlap homicide. Mr. Dunlap had the motive in the form of \$1,000,000.00 in life insurance benefits through the Chubb Life policy and \$745,000.00 in group life insurance on Anne Dunlap's life through her employment at Pillsbury. Bradley Dunlap is the beneficiary on all of this life insurance.

4. That forensic evidence indicates that the murder of Anne Dunlap occurred at approximately 2:30 p.m. to 3:00 p.m. on December 30, 1995. Dr. Daniel Davis, Assistant Medical Examiner for Hennepin County, conducted an autopsy of Anne Dunlap and concludes that she died between 2:30 p.m. to 3:00 p.m. on December 30, 1995. The forensic evidence also indicates that the murder of Anne Dunlap occurred in the garage of her parents' home. This is the home where Anne and Bradley Dunlap were living and where Bradley Dunlap acknowledged that he was on December 30, 1995 from 2:30 p.m. to 3:00 p.m.. Forensic evidence indicates that the murder of Anne Dunlap occurred in the garage of her parents' home because Anne Dunlap's blood is found in three locations in the garage. Furthermore, there were positive presumptive indicators of blood found in the washtub and lint trap located in the laundry room of Anne Dunlap's parents' home. This forensic evidence suggests a clean-up by the murderer.

5. Bradley Dunlap has been unable to corroborate through independent and reliable sources what his activities were during the afternoon of December 30, 1995. By his own admissions to me, Mr. Dunlap places himself on December 30, 1995 in an area near where the body of Anne Dunlap and her vehicle were subsequently located on January 1, 1996.

6. There is no plausible alternative explanation to Anne Dunlap's death other than the conclusion that Bradley Dunlap is the murderer.

FURTHER AFFIANT SAITH NOT.

Dated this 15 day of May, 1997

Sgt D. Voss #7441

Sergeant David Voss

Subscribed and sworn to before me
this 15th day of May, 1997.

Sally J. Johnston

Notary Public

