



STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

COURT FILE NO.: _____

PROSECUTOR FILE NO.: 2088797

State of Minnesota,

Plaintiff,

v.
Norman Allen Bachman Jr.
(DOB: 02/19/1962)
Current Address Unknown

FELONY
CRIMINAL COMPLAINT

Summons Warrant
 Order of Detention

Amended
 Certified Juvenile
 EJJ

Defendant.

The Complainant, being duly sworn, makes complaint to the above-named Court and states that there is probable cause to believe that the Defendant committed the following offense(s):

COUNT 1

On or about the 25th day of April, 1997 to the 22nd day of May, 1997, in Ramsey County, Minnesota, the defendant, **NORMAN ALLEN BACHMAN JR.**, did unlawfully cause the death of Toni Ann Bachman (DOB: 5/17/59) without intent to effect the death of any person, while committing or attempting to commit a felony.

Said acts constituting the offense of **Murder in the Second Degree** in violation of MN Statute: §609.19.2(1)
Maximum Sentence: 40 years.

COUNT 2

On or about the 25th day of April, 1997 to the 22nd day of May, 1997, in Ramsey County, Minnesota, the defendant, **NORMAN ALLEN BACHMAN JR.**, did unlawfully cause the death of Toni Ann Bachman (DOB: 5/17/59) while committing Assault in the Fifth Degree or attempting to commit a misdemeanor or gross misdemeanor with such force and violence that death of or great bodily harm to any person was reasonably foreseeable.

Said acts constituting the offense of **Manslaughter in the First Degree** in violation of MN Statute: §609.20.2
Maximum Sentence: 15 years or \$30,000 fine, or both.



STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Background

In 1982, the Norman Allen Bachman (DOB: 2/19/62), the above-named defendant, married Gail Piepenbrink. That marriage produced three children: Norman III (DOB: 6/28/83), Christopher (DOB: 4/22/85), and Fredrick (9/7/86). The defendant and Piepenbrink were divorced in April 1986. By October 1986, the defendant was living with Toni Ann Bachman (DOB: 5/17/1959). The defendant and Toni married on June 10, 1987. In 1990, Toni, the defendant, and the three boys moved to 1785 Stillwater Street, White Bear Township, Ramsey County, Minnesota. Between May 1987 and May 1994, Toni had five miscarriages. On September 18, 1996, Toni gave birth to a boy, Michael; however, Michael died just minutes after birth. His body was cremated, and the ashes were kept in an urn in the Bachman house.

Toni was a computer expert and spent a great deal of time on the Internet. In particular, she participated in an online chat group called the Inner Circle. The Inner Circle consisted of approximately fifteen to twenty people scattered throughout the United States. Investigators have spoken with people from the Inner Circle, and they reported that when Toni posted messages, she frequently complained about her marriage and said that she wanted a divorce.

In approximately January 1997, Toni began communicating with D.C., a man from West Virginia, whom she met on the Internet. Toni and D.C. soon began communicating almost daily—either by email, telephone, or instant message—sometimes multiple times per day. Toni was very open with co-workers and the Inner Circle about her personal life, and she frequently told people that she was in love with D.C. and wanted to move to West Virginia to be with him. Toni told some people that she once met up with D.C. in a hotel, but to others she acknowledged that she had never actually met D.C.

In 1997, Toni was working in the IT department at Hamline University in St. Paul, Minnesota. She had been there ten years. In February 1997, Hamline informed her that her job was being eliminated and that she was being transferred to the HR department on a temporary basis. She was told that if she decided to leave Hamline, she would be given severance equal to one week's pay for each year of service. On April 22, 1997, Toni was offered a permanent job in HR. She accepted the offer, hereby turning down the severance package. That same day, Toni applied for a Hamline parking permit for the spring of 1997, listing her Ford Taurus as her vehicle and 1785 Stillwater Street as her address.

Toni Bachman disappears

On Monday, April 28, 1997, Toni did not show up for work. Her supervisor called the Bachman house and spoke with the defendant. The defendant said that Toni left him Sunday afternoon. The defendant called back later that day and said that Toni called and said that leaving was for the best.

On Thursday, May 1, when Toni still had not called or shown up for work, one of Toni's co-workers called police. The next day, Deputy Henriksen of the Ramsey County Sheriff's Department went to the Bachman house and spoke with the defendant. The defendant said that he had not spoken with Toni since Sunday and had not seen her since Friday. He said that he and Toni had an argument on Friday and that after that he spoke to her only through the bedroom door. He said that on Sunday Toni told him to take the boys to the store and that when they got back she was gone. He said that he has not heard from her since. The defendant said that



Toni previously told him that she wanted a divorce. Deputy Henriksen walked through the house but did not see anything unusual.

Five days later, Deputy Henriksen returned to the Bachman residence in response to a 911 hang-up call. When he arrived, he learned that two of the Bachman boys had been fighting. While handling the call, the defendant told Deputy Henriksen that he still had not heard from Toni.

On May 13, 1997, investigators spoke with Toni's supervisor and co-workers. They said the following:

- Supervisor D.L. said that Toni recently ordered office supplies: a desk calendar, keyboard pad, and bulletin board.
- Co-worker B.E. said that she spoke with Toni on Friday, April 25, and that Toni seemed happy about her relationship with D.C. She said that Toni said that since her job at Hamline was now secure, she and D.C. were talking about D.C. moving to Minnesota because she could now support him for a while.
- Co-worker D.E. said that she had lunch with Toni on Wednesday, April 23, and that she did not recall Toni saying that this was the weekend that she was going to leave the defendant. She said that she knows that Toni was having an Internet relationship with D.C. and that she previously had an Internet relationship with a man from Connecticut whose initials are V.S. D.E. said that she believes that Toni's relationship with V.S. ended a while back.
- Co-worker J.M. said that she had lunch with Toni on Friday, April 25, and that Toni said that she wanted to leave the defendant but wanted her financial worries to settle down first. She said that she knew that Toni had an Internet friend named [V.S.]. She wondered whether the urn containing Michael's ashes was still in the house. She did not believe that Toni would ever leave without it.

Interview with the defendant

On May 13, 1997, investigators spoke with the defendant. The defendant said that when Toni came home from work on Friday, April 25, she complained about having a boil on her butt. He said that he left for work that evening at 6:30 p.m. but came home at 10:00 p.m. because Toni called and said that the kids were driving her nuts. He said that he and Toni had been discussing divorce in recent months and that Toni had been saying that she wanted to pack up and leave. He said that Toni stayed in their bedroom most of the weekend but that on Sunday she left the house to get something to eat. He said that in the early-afternoon on Sunday, he drove Toni to Walgreens to get some gauze for her boil and that he stayed in the car while she went in the store. He said that when they got home from Walgreens, Toni told him to take the kids to the store and that he should take her station wagon (rather than the defendant's pickup truck). He said that they left for the store at 4:30 and returned around 6:30. He said that when they returned, Toni was gone. He said that he called his supervisor and told him that he would need to take the week off. He said that on Monday he found a note from Toni that said, "Bye Norm. I'll call you soon" but that he has since lost the note. He said that on Monday afternoon, Toni called the house and said that she was sorry about the way she left but that it was best for the children and that she doesn't owe him any excuses. He said that he asked Toni where she was but she wouldn't tell him. He said that the caller ID showed the number as "Anonymous." He said that before she called, he tried to call her at her work and later received a call from her co-worker looking for her. The defendant said that after Toni disappeared, he had Norm III hack into Toni's email account and print stored messages.



The defendant provided investigators with over 250 printed emails between Toni and D.C. The emails clearly evidenced an intimate relationship. In some emails, Toni complains about her marriage and says that she wants to leave the defendant. Many emails are sexual in nature (sexual fantasizing). In no email does Toni state that she has a specific plan to leave the defendant, is planning to leave her job, or suggest that she is planning to leave the weekend of April 26.

Interview with Fredrick (age: 10)

On May 13, 1997, investigators took a statement from Fredrick. Fred said that the last time he saw Toni was Friday. He said that the defendant and Toni argued Friday night and that he heard Toni say that their marriage was an illusion. He said that Toni spent Saturday and Sunday in the bedroom and that the defendant slept on the couch. He said that on Sunday, he went fishing with his brothers and that before they left he saw the defendant try to get into the bedroom and he heard Toni say, "No" from inside the bedroom. He said that when they got back from fishing on Sunday, the defendant again tried to get into the bedroom. He said that he heard the defendant talking to Toni but did not hear Toni respond. He said that Toni left her keys and makeup and took only a few clothes.

Interview with Norman III (age: 13)

On May 13, 1997, investigators took a statement from Norman III. Norm III said that he and his brothers went fishing on Saturday and were gone about two hours. He said that before they left, he heard Toni crying in the bedroom. He said that after they got back from fishing, he heard Toni walking around in the bedroom and changing the channel on the TV. He said that he thought he heard this on Sunday, too. He said that he heard Toni's footsteps before they left for the grocery store on Sunday. He said that the defendant told them that he found a note that Toni left but that he never saw the note.

Interview with D.C.

On May 13, 1997, investigators spoke with D.C. D.C. said that he last communicated with Toni on Friday, April 25, at 9:00 p.m. He said that he has never been to Minnesota but that he and Toni planned to meet after she was divorced. He said that he has sent Toni a few emails since April 25 but that he never received a response. He said that Toni was going to leave the defendant at the end of April or early-May but that she wanted to get her finances in order first.

D.C. forwarded to investigators seventeen emails that he had from Toni. Most of the emails consisted of Toni telling D.C. about her daily activities. All the emails end with Toni telling D.C. that she loves him. In one email, dated March 26, 1997, Toni tells D.C., "[Y]ou are constantly on my mind!" Below are excerpts from some of these emails, including two that Toni sent the Friday before she disappeared:

April 19, 1997:

I LOVE YOU! And I'm so fucking pissed off right now I had to calm myself down by telling you!

That asshole I am still (because I am so fucking nice) married to is a fucking bastard! After we hung up the phone rang within 30 seconds. Right away on caller ID I knew it was the asshole himself. He was in a fighting mood and just went off on me like there was no tomorrow. . . . The fucker even called me a "whore cunt" and used in the wrong context – which it was – those are



fightin' words. Then he went on and on and on. . . . I just had to tell you I love you so it can blow off the steam I have right now.

So. . . . I LOVE YOU!!!!

Toni

P.S. Smooches!

Friday, April 25, 1997 at 8:18 p.m.:

I think Norm is coming home from work to fight again. Only this time I mean FIGHT in a much bigger way. He is threatening me with stuff.

Friday, April 25, 1997 at 8:58 p.m.:

I'm back on email but can't chat because Norm is home. So. . . whatever!

Love you!

Toni

P.S. hes [sic] staring at the screen too! I LOVE YOU!!!!

In addition, D.C. provided investigators with two emails that were sent to him on Toni's account after she disappeared. The emails appear to have been written by the defendant. The first is dated May 10, 1997, and is signed "Norm". In this email, the defendant tells D.C. that Toni had been having sex with many men and that "[s]he had a lot of skeletons in the closet and they were coming out in a big way!" The second is dated May 12, 1997. It is unsigned, but it references the May 10 email, and the writer refers to himself as Toni's husband. In this email, the defendant continues to disparage Toni, saying that she had them both "fooled". In neither email does the defendant ask D.C. whether Toni is with him, whether he knows where she is, or whether he has heard from her.

Donna Reineccius

On May 13, 1997, Toni's mother, Donna Reineccius, provided a statement to investigators. She said that in the evening on Saturday, April 26, she called the Bachman house looking for Toni. She said that the defendant answered the phone and said that Toni was resting in the bedroom because she has a boil. She said that the defendant told her that he and Toni were having marital problems. She said that she asked the defendant to have Toni call her but that Toni never called. She said that she called again Sunday afternoon and again spoke with the defendant. She said that the defendant told her that Toni was shopping. She said that on May 1, 1997, she called again and left a message on the answering machine. She said that the defendant called back and said that Toni had left. She said that the defendant told her that Toni called on Monday but that the caller ID showed the number as being blocked.

Reineccius died in 2008. On many occasions before she died, Reineccius told investigators and family members that she used to speak with Toni weekly but that after Toni disappeared, she never heard from Toni again.

**Interview with V.S.**

On May 13, 1997, investigators spoke with V.S. by telephone. V.S. said that he has not communicated with Toni in over a month and that he ended the relationship due to Toni's flirtatious relationship with D.C. He said that the last email he got from Toni was Toni telling him that she wanted to end the relationship. He said that he didn't respond to the email and that he previously told her that he wanted to end the relationship. He said that he communicated with Toni off and on for about a year, that he has never been to Minnesota, and that he never met Toni in person.

V.S. died in 2006.

Interview with Christopher (age: 12)

On May 19, 1997, investigators took a statement from Christopher. Chris said that leading up to her disappearance, Toni talked about leaving. He said that when Toni got home from work the Friday before she disappeared, she and the defendant argued. He said that the defendant went to work that evening but came home a short time later after arguing with Toni on the phone. He said that once the defendant got home, Toni and the defendant argued until about midnight. He said that he heard Toni scream "that night," (he seemed to be referring to Friday night, but it is not entirely clear). Chris believed that the scream was attributable to her picking at her boil. He said that he didn't see Toni Saturday or Sunday or any day thereafter. He said that on Saturday, he and both his brothers spent most of the day fishing and that when they got back, the defendant kept going into the bedroom, but he (Chris) never heard or saw Toni. He said that on Sunday morning, he and his brothers played outside and that Fred and Norm III then went fishing again but that he (Chris) stayed back and hung around inside the house. He said that when his brothers got back from fishing, all three boys and the defendant went to Kowalski's grocery store at about 4:30 and that when they got back from the store, Toni was gone. He said that lots of stuff was missing but that Toni's favorite pair of shoes was left behind. He also said that the Wednesday before Toni disappeared, he overheard Toni talking to someone on the phone telling that person that she loves him and to pick her up at the airport on Sunday.

Interview with the defendant

On May 20, investigators took another statement from the defendant. The defendant said that the Friday before Toni disappeared, Toni came home from work and complained that her boil hurt. He said that he left for work about 6:30 but came home early and that when he got home, Toni was on the computer but got off abruptly when he came in. He said that Toni began arguing with him about the kids and their marriage and said that everything was just an illusion. He said that on Saturday Toni stayed in her room. He said that Toni came out of the room later in the day, took a shower, and was going to go into town but decided not to. He said that as far as he knew, the kids didn't see Toni on Saturday. He said that the kids came in from outside around dinnertime but that Toni told him to make dinner while she stayed in the bedroom. He said that he slept in the bed with Toni Saturday night. He said that on Sunday, Toni told him to take the kids to the grocery store. He said that they left for the store around 4:30 and that he locked the front door when he left. He said that they returned about 1-1/2 to 2 hours later and that when they returned, Toni was gone. He said that on Monday he found a note from Toni. He called Toni at work on Monday shortly after 8:00 a.m. and left a message. He said that someone from Hamline called him and said that Toni had not shown up for work. The defendant said that Toni called on Monday at 1:00 or 1:30 p.m. and told him that she doesn't owe him any explanation. He said that Toni never told him where she was and that the caller ID box showed the number as "Anonymous." He said that he stayed home from work the first four days after Toni disappeared. He said that he wasn't worried about Toni until a couple days later when he didn't hear from her.



The defendant's voice message to Toni

Investigators obtained a copy of messages that were left on Toni's voicemail at Hamline. One of the messages was from the defendant and was left on Monday, April 28, at 8:21 a.m. The message said:

Hi, Toni. This is me, um, calling to see if you're at work. Um, you haven't called me yet, ah, the note said so . . . just seeing if you're at work. Well, give me a call when you get there or something, and I'll try back a little bit later, okay? Bye.

Searching the Bachman house

On May 22, 1997, the Ramsey County Sheriff's Department and the Minnesota Bureau of Criminal Apprehension executed a search warrant on the Bachman residence. During the search, investigators noted that there was a telephone on a table and a computer on a desk in the living room.

In the basement they found the following:

- The basement contained a root cellar, which was a small room attached to an exterior wall. The root cellar had two entrances, one leading to the basement and the other leading outside. The entrance leading to the basement had two doors, a screen door and a heavier door. The heavier door was painted white and was padlocked shut. Both the padlock and hasp were shiny and appeared new. The trim to the right of the door was missing, and the hasp overlapped the area where the trim used to be. There was trim around the rest of the door. The hasp partially covered a rectangular unpainted area with a horizontal rub mark across its center. The unpainted area was the size of a common slide lock or hasp. Thus, it appeared that there had been a different lock or hasp on the door at some point in the past. The door leading outside opened inward and was partially covered with sheet plastic on the inside. Thus, the door could not have been opened unless the plastic was subsequently replaced from inside.
- Inside the root cellar was a chest freezer. There were approximately ten (10) spots of apparent blood spatter on the front of the freezer facing the door to the basement. One stain was tested, and the test indicated that the stain was blood. Investigators collected swabs from the blood stain, and the swabs were labeled Item 13. DNA tests conducted on Item 13 indicated that the single-source profile was female. The tests also indicated that it is approximately 434 billion times more likely that the profile is from the offspring of Toni's biological parents than it is that the profile came from the offspring of a randomly-selected male and female. Toni has no sisters. Thus, this profile is considered to be the deduced missing person sample from Toni Bachman.
- On the floor between the root cell and the laundry room, investigators found approximately twelve (12) small stains of apparent blood. Investigators tested four of these stains, and the tests indicated that the stains were blood. DNA tests conducted on two stains from the floor between the root cellar door and the laundry room. The single-source profiles obtained from these stains both indicated to be female, and the profile matched the deduced profile for Toni Bachman from Item 13. One of these profiles would not be expected to occur more than once among unrelated individuals in the world population. For the other profile, the probability of selecting an unrelated individual at random from the general population having a DNA profile that would match this profile is approximately 1 in 5.2 billion.



- When investigators sprayed Luminol on the floor inside the root cellar, there was a positive reaction in the area immediately inside the door in front of the chest freezer. Luminol sprayed in the laundry room revealed a positive reaction in the shape of parallel lines. Luminol emits light in reaction to several things, one of which is blood.
- Inside the root cellar was a plastic cooler and a cardboard box for an artificial Christmas tree. There was apparent blood spatter on two adjacent sides of the cardboard box, and one side had a large apparent bloodstain. The appearance of this stain was consistent with someone trying to wipe off a stain but smearing it instead. Tests later indicated that the stain was blood. DNA tests were conducted on three (3) portions of the blood spatter on the box. The single-source profiles obtained from the three tested areas on the box all indicated as being female. Using the profile from Item 13 as a deduced profile for Toni Bachman, the profiles obtained from the box stains match the profile for Toni Bachman. For one stain, this profile would not be expected to occur more than once among unrelated individuals in the world population. For the remaining two stains, the probability of selecting an unrelated individual at random from the general population having DNA profiles that would match the profiles from the stains are approximately 1 in 490 million and 1 in 57 million, respectively.
- There was apparent blood spatter on both the screen door leading from the basement to the root cellar. Tests conducted on the apparent blood spatter indicated that the stains were blood. DNA tests were conducted in six (6) blood spatter stain, and the tests indicated that the single-source profiles were female. Using the profile from Item 13 as a deduced profile for Toni Bachman, the profiles obtained from the six spatter stains match the profile for Toni Bachman. The probability of selecting an unrelated individual at random from the general population having a DNA profile that matches these six profiles is approximately 1 in 93 billion, 1 in 12 hundred, 1 in 12 hundred, 1 in 57 million, and 1 in 9.1 million, 1 in 50 billion, and 1 in 8.8 billion, respectively.
- The doorknob on the root cellar side of the wood door had an apparent bloodstain. Tests indicated that the stain was blood; however, there was insufficient genetic material to make a statement on the DNA types obtained.
- There were two small globules of biological tissue stuck to the screen door and heavier door between the basement and the root cellar, one on each door. A medical examiner later determined that the globules were adipose fat tissue. One piece of fat tissue also contained fragments of muscle tissue. DNA tests were performed on one of the pieces of fat tissue, and it indicated that the single-source profile was female. Using Item 13 as a deduced profile for Toni Bachman, the profile obtained from the fat tissue matched the profile for Toni Bachman. The probability of selecting an unrelated individual at random from the general population having a DNA profile that matches this profile is approximately 1 in 12 thousand.

In the master bedroom on the main floor investigators found the following:

- There was a telephone with a Caller ID device next to the bed.
- There was a box containing two letters from Toni to the defendant. In one letter, Toni complains to the defendant that he is excessively dependent on her. In the other letter, she discusses her love for



another person. She doesn't mention the other person's name, but she says that she communicates with him often but not face-to-face. It is clear from the letter that Toni knows that the defendant already knows about the other person. Both letters are undated.

- The box noted above also contained three love letters from Toni to D.C. The letters are dated April 2, 1997, April 17, 1997, and April 21, 1997. In the April 17, 1997 letter, Toni tells D.C. that taking the severance package from Hamline would "take care of the financial concerns I have here", and she listed various debts, including a Sears bill (amount unstated) and a \$3,000 balance on a credit card. There is also the following passage:

So, if I leave my job, that situation is taken care of. But then, the only real reason I'd like my job to end would be if I was moving far away – here is where you come into the picture. I mean, of course, that if I wasn't going to be sticking around here anyway, there isn't really a reason not to leave and take the money. If I did so it seems kind of silly to take the job, lose the cash, then leave the job soon thereafter. So there is my quandary over my job (mixed up with other stuff). ☺

The April 21, 1997 letter includes the following passage:

I went out on another limb today. I wrote an email to my email group that said this: "More than anything I have this incredible urge to throw every sense of caution I have to the winds. No matter how much reserve you all know I have, I want to step out of the box and do something so incredibly unlike myself and I want to tell [D.C.] in the worst way—but I'm afraid I may meet with rejection. I don't know why I feel it may be there even. What I want to do—and I am serious beyond belief ladies—is pack up, hit the road, and go to him in W.Va." . . . At the very least I'd never go to my grave regretting that which I wished I'd done—because I would have done it.

In none of these letters does Toni discuss any specific plan to leave her job or the defendant or suggest that she was planning to leave the weekend of April 26.

- There was a box of printed emails between Toni and D.C. They were the same emails that the defendant gave investigators on May 13.
- In a chest of drawers, investigators found two printed emails from D.C. to Toni. Both were dated April 28, 1997 and were time-stamped 2:24 p.m. and 7:18 p.m. The first read:

Hey hon,

Are you doing ok? Do you think we can chat tonight? I hope so, I miss you!

The second read:

Are you doing ok hon? I haven't heard from you. . . I hope that you are ok and that nothing is wrong. . . Hope to hear from you soon!

Neither email was included in the stack that the defendant gave to investigators on May 13.



- There was a bed sheet stuffed between the mattress and the bed frame. The sheet contained a stain that tests identified as being human blood. The single-source DNA profile from this stain indicated to be female. Using Item 13 as a deduced profile for Toni Bachman, the profile obtained from the blood stain matched the profile for Toni Bachman. This profile would not be expected to occur more than once among unrelated individuals in the world population.
- In the closet, investigators found a box containing Toni's family photos (and the negatives) from when she was young and photos of Toni holding Michael in the hospital. They also found an urn containing ashes.

The vehicles:

- Investigators searched the defendant's pickup truck and found a small stain of apparent blood on the right side of the vehicle. Tests indicated that the stain was blood, but due to insufficient and/or degraded DNA, no profile was obtained. There was nothing of evidentiary value found in Toni's vehicle.

Interview with Christopher (age: 12)

On May 29, 1997, investigators interviewed Christopher. Chris said that the defendant put a lock on the cold room after he and Fred ran away from home in December. He said that when he, Fred, and Norm III got back from fishing on Saturday, he didn't see Toni. He said that on Sunday, Fred and Norm went fishing but that he stayed home. He said that he spent the day playing Nintendo and playing outside. He said that on Sunday, the defendant was in and out of his and Toni's bedroom a lot. He said that the defendant later told him that he and Toni went to Walgreens on Sunday but that he (Chris) didn't see this happen.

Chris said that the Wednesday after Toni disappeared, the defendant took all three boys out of school and brought them up to a farm owned by the defendant's sister, Vickie Horn. He said that the defendant told the boys that he was going to see someone about money. He said that the defendant drove Toni's station wagon to Verndale and had large coolers packed in the back with a cover over them. He said that when they got to the farm, the defendant dropped the boys off with Vicki then left again for 1-1/2 to 2 hours. He said that when he got back, the defendant left again for a short time, saying that he was going to find some trees to replant back home. He said that when the defendant returned, he had one small tree. He said that as they drove, he could hear water sloshing around in the coolers.

Interview with the defendant

On June 6, 1997, investigators spoke with the defendant. The defendant said that he remembered the trip to Verndale and that he went to find his step-mother but never found her. The defendant's step-mother is Jean Shelito.

Interview with Jean Shelito

On June 6, 1997, investigators spoke with the defendant's step-mother, Jean Shelito. Shelito said that she hasn't spoken with the defendant since summer 1996 and that he did not call her in April to ask to visit. Shelito said that the defendant knows where she lives and has visited her twice in the last three years.



Shelito lives near Little Falls, Minnesota, which is about 50 miles from Verndale. The most direct route from White Bear Lake to Verndale is to take Highway 10, which goes through Little Falls. Thus, driving from White Bear Lake to Verndale, then to Little Falls, then back to Verndale, then back to White Bear Lake adds about 200 miles to the trip compared to driving from White Bear Lake directly to Little Falls and back.

Searching the backyard at the Bachman home

On July 14, 1997, investigators used dogs to search the backyard at the Bachman residence. They did not find any trace of Toni. Investigators spoke with the defendant and asked him about the blood they had found in the basement. The defendant said that Toni once cut her finger in the basement.

Interview with Christopher (age: 12)

On November 18, 1997, investigators spoke with Chris. Chris said that the Saturday before Toni disappeared, the kids woke up, had breakfast, and watched television. He said that while they were watching television, the defendant went into the bedroom, and they heard Toni scream. He said that the boys all thought the defendant had killed her. He said that when the defendant came out from the bedroom, they asked him why Toni screamed. He said that the defendant responded that he flicked off Toni's boob. He said that the boys played outside the rest of the day and didn't see Toni. He said that the defendant was in the bedroom constantly that weekend. He said that later that week, they all went to Verndale so that the defendant could talk to somebody about money. He said that after Toni disappeared, the house smelled "bitter" and that on the drive home from Verndale, the car smelled "bitter and awkward". He initially said that he didn't mention this before because investigators didn't ask, but then he said that it was because he felt uncomfortable.

Search of the Horn farm and Shelito's property

On May 12, 1998, investigators used dogs to search the Horn farm and Shelito's property. They did not find anything of evidentiary value.

Toni's emails to the Inner Circle

Investigators spoke with Inner Circle members, and all of them said that they have not heard from Toni since she disappeared. One member provided copies of emails that Toni sent to the Inner Circle. Below are excerpt from some of these emails:

January 14, 1997:

I told Norm last night that I want a divorce. It's not about [V.S.], and its not about [D.C.]! It's about ME!

...

Well right now, I need to get on my own. And its going to take me a few months to do that – I still am unwilling to just up and leave for the kids sake!



March 3, 1997:

On Friday at precisely 2:00 p.m. I was told that my job was being eliminated. At precisely 2:01 p.m. I was told that I was being reassigned to the Human Resources department for three months. . . . During that time, if I choose to leave Hamline they will pay me a one week per year of service severance package (1 X 10 = 10 weeks of pay) Pay all benefits for six months and its over. If I decide I would like to stay on at HU, Dixie will assist me in finding a job on campus – of which two are already in the works. . . . And, truth be told, I guess I hope I find a new job so I can take the “package” and run with it! I mean what an end to financial worries of all kinds!

April 2, 1997:

Oh, no new job yet either – still in the Human Resources Department—still waiting on the right time to leave and a hiffy [sic] severance package!

April 16, 1997:

I told Norm I’m leaving at the end of the month – in reality I don’t [know] if its possible – I can’t find an apartment! Arrrggggghhhhh! But I’m still looking! [D.C.] and I are connecting in person in early March [sic] and perhaps then at the end of May I will be moving to West Virginia – if all goes as is being planned right now – and you all know how plans can change!

My job is FUN! She wants to hire me – but I’m again holding out because if I leave for WV – why do I want to get hired and then miss out on the severance package!

April 22, 1997:

I’ve officially been hired as the benefits/Compensation Analyst at Hamline. Yippee – I’m no longer unemployed at the end of May. [I]n fact, have a sweeter deal still.

Well, what the heck! Looks like life is still a continuous merry go round. Problem is – being hired means I turned down the severance package and any hope of being able to financially afford to travel down the road to W. Va.

Other emails from Toni to D.C.

Toni’s internet service provider gave investigators additional emails that Toni sent to D.C. In none of the emails does Toni discuss any specific plan to leave the defendant or suggest that she would be leaving the weekend of April 26, 1997. The following are excerpts from some of these additional emails:

January 22, 1997

I wish I could just up and leave – but I just can’t do that to the boys – I just can’t! The financial picture makes it pretty difficult as well. I just can’t find it in my heart to be that mean!



February 20, 1997

I've made an appointment to meet with a lawyer next Tuesday – hopefully I'll find the answers I need to get my self [sic] taken out of the situation with no worry of being taken advantage of. . . . I'm hoping I can leave, and he [sic] legal action itself will take care of the financial concerns I have. Meaning, I hope that my not paying the house payment, other bills, utilities, etc. won't have any negative repercussions on my future credit and what not.

March 31, 1997

You said in your [email] yesterday that you really want to have me there with you. David, do you think this is wise? . . . We have only met here in cyberspace – do you think it is wise for me to make a move of the magnitude without ever meeting first? My tendency is to say no – because we can't know for sure if what we think we have is or will be real until we actually meet face to face. At one point you talked about coming up here for a visit in April. It hasn't been mentioned for a long while. I know I feel very strongly about some issues in this regard and I guess I need to discuss them with you and see where you stand.

The defendant's sexual assault on S.M.

On September 19, 1998, police respond to a 911 call by a patient at Regions Hospital reporting that there was a suicidal man at the Bachman residence. The caller was S.M. (an adult female), and she said that the suicidal man was the defendant. Police surrounded the Bachman house and eventually talked the defendant into coming out. He was taken into custody. S.M. was treated for a knife wound to the neck.

S.M. told police that she had been dating the defendant for a little more than a year, that they began dating about a month after Toni disappeared, and that she had been trying to break off the relationship for the last three months. She said that the previous day she told the defendant by telephone that their relationship was over. She said that the defendant took it hard and reminded her that she agreed to meet that night for a personal ceremony in memory of his deceased son, Michael, who died two years ago that day. She said that she agreed to meet the defendant for the ceremony. She said that when she got there, the defendant told her that she looked tense and suggested that she lay down on the bed for a backrub. She said that after giving her a backrub for about 30 minutes, the defendant suddenly grabbed her around her head and neck and held a knife to her throat. She said that the defendant yelled things like, "Now you are going to pay!" She said that the defendant grabbed a duffle bag from under the bed and removed rope, flex-ties, and chains from the bag. She said that the defendant tied her hands around her back and placed a tube-like tie around her neck. She said that the defendant tied her ankles to something so that her legs were spread apart and used a knife to cut off her clothes. She said that the defendant then put his penis in her vagina and threatened to cut off her nipples. She said that the defendant said that he wanted to die and was going to kill himself and didn't want to die alone so she would need to die too. She said that this went on all night and that in the morning she convinced him to let her go by telling him that she wanted to hug her kids one last time but that she would come back.

When police searched the house, they found handcuffs, locks, chains, and pieces of bloody rope. Tests subsequently determined that the DNA profile from the blood on the ropes matched S.M.'s profile. Investigators interviewed the defendant, and he admitted to most of the allegations, though he said that he never



meant to hurt S.M. The defendant was charged in Ramsey County District Court with Criminal Sexual Conduct in the First Degree. He subsequently pled guilty to and was sentenced to 86 months in prison.

Interview with Fredrick (age: 16)

On July 1, 2003, investigators spoke with Fredrick. Fred said that when they came back from the grocery store the day Toni disappeared, they did not check the root cellar because it was locked with a padlock. He also said that he saw the defendant enter the bedroom with an Exact-o knife (it is unclear from the statement when this happened). He said that he then heard a muffled sound like someone trying to say something from under a pillow.

Interview with Norman III (age: 20)

On July 22, 2003, investigators spoke with Norm III. Norm III initially said that he searched the cold room while looking for Toni, but then he expressed doubt as to whether he did. He wasn't sure. He said that he never saw Toni after Friday but that he did hear her in pain that weekend (he didn't specify when this was). He said that he did not recall any strange odor in the house or the car.

Interview with Christopher (age: 18)

On July 22, 2003, investigators spoke with Christopher. Chris said that the Saturday before Toni disappeared, he and his brothers were watching cartoons when he heard Toni scream. He said that the defendant came out of the bedroom and said that he popped Toni's boil. He said that the defendant later went back into the bedroom and that when the defendant opened the door, he (Chris) could see Toni laying on the bed on her stomach. Her arms were extended up under the pillow, and her eyes were closed. It was the last time he saw her. Chris reiterated that they didn't search the cold room when they were looking for Toni. He said that the Monday after Toni disappeared, the defendant told the boys that Toni called from South Dakota and that she was never coming back. He also said that when they went to Aunt Vicki's house, the back of the car was packed full.

Interview with Fredrick (age: 16)

On August 6, 2003, investigators interviewed Fred. Fred said that a day or two after Toni disappeared, the defendant told him that Toni called and said that she was okay and not to look for her. Fred said that the defendant did not say where she was calling from. Fred said that he checked the caller ID box and that there was no entry for such a call. Fred said that he asked the defendant about this and that the defendant said that the call never showed up on the caller ID. Fred said that the defendant did not seem sad that Toni had left.

Interview with Norman III (age: 20)

On August 24, 2003, investigators spoke with Norm III. Norm III said that before the trip to Verndale, he helped the defendant load coolers and buckets and maybe a shovel into the vehicle. He said that there might have been water in one of the coolers, he wasn't sure.

Interview with Christopher (age: 26)

On April 2, 2012, investigators spoke with Christopher. Chris said that when they all went to the store the day Toni disappeared, he saw Toni in the bedroom laying on her back in the bed. He said that Toni had never before spent the entire weekend in the bedroom. He said that when they went to Verndale, one of the coolers in



the back of the car was very long. He said that the day before going to Verndale, the defendant was in the basement a lot. He said that during the trip to Verndale, Fred kept asking the defendant what was in the back of the car and that the defendant told Fred that he didn't want to hear any more about it.

Interview with Fredrick (age: 25)

On June 7, 2012, investigators spoke with Fredrick. Fred said that the defendant always kept the root cellar locked and that after Toni disappeared, the defendant spent a lot of time cleaning the basement near the root cellar and that he used bleach. He said that he never heard Toni mention being injured in the basement. He said that in more recent years, he and the defendant both worked for the same company and that once while they were working together, he confronted the defendant about Toni's disappearance. He said that the defendant admitted killing Toni but said that nobody can prove it. He said that while they were driving to Verndale after Toni disappeared, there was a strange odor in the car. He said that he has since worked at a funeral home and that based on that experience he now knows that the odor he smelled in the car was the smell of a human corpse. He said that he saw a shovel, two buckets, and a cooler in the car. He said that when they got to Verndale, the defendant left the boys with Vickie for a couple hours while the defendant went to get some trees to transplant back at the house. He said that the trees seemed like a big deal to the defendant, which he said was strange because the defendant is not a nature-loving guy.

Interview with Norman III (age: 29)

On August 27, 2012, investigators spoke with Norman III. Norm III said that before the trip to Verndale, the boys helped the defendant load a couple of buckets, a shovel and maybe a cooler in the vehicle. He said that once they got to Verndale, the defendant dropped the boys off with Vickie while the defendant went looking for pine trees. He said that the defendant came back with "like one small tree." He said that he did not recall any strange odor in the car. He said that the Sunday morning before Toni disappeared, he and his brothers were watching television when they heard Toni scream, though he said it was not a loud scream. He said that the defendant came out and said that he tried to pop Toni's boil. He said that when they got back from the grocery store on Monday, the bedroom door was open and Toni was gone. He said that the door had been locked from the inside. He said that he wasn't sure whether he searched the root cellar for Toni; he said he thought he did but wasn't sure. He said that the defendant never showed him a goodbye note from Toni.

Interview with Christopher (age: 29)

On January 21, 2015, investigators spoke with Chris. He said that the lock on the root cellar door used to be a "deadbolt." He said that after he and Fred ran away from home one night, the defendant nailed the windows closed and put a padlock on the root cellar door. He said this happened approximately the December before Toni disappeared. He said that immediately after Toni disappeared, the defendant replaced the padlock with a heavier padlock. He also said that the night before the Verndale trip, he heard the defendant doing something near the root cellar with what sounded like plastic sheeting. At the time, Chris' bedroom was in the basement.

Other investigation

Investigators have inspected records from early-January 1997 through mid-June 1997 for Toni and the defendant's joint checking account. They saw no checks written by Toni after April 25, 1997, no large or unusual cash withdrawals, and no ATM withdrawals outside the Twin Cities/White Bear area. Toni's final paycheck from Hamline was directly deposited into this joint account on April 30, 1997, the Wednesday after she disappeared. The direct deposit statement for that check shows that Toni had 178 hours of accrued vacation



time. Toni has never contacted Hamline to cash out unused vacation time (she would have been entitled to cash out up to 150 hours). Investigators have obtain the phone records for the Bachman residence and for D.C.'s residence in West Virginia. These records show only outgoing long-distance calls; they do not show incoming calls or local calls. These records show that there were no long-distance calls placed from the Bachman phone the Wednesday before Toni disappeared, which is the day that Chris told investigators he overheard Toni telling someone on the phone to pick her up from the airport. The records also show that there were no long-distance calls placed from D.C.'s phone to any number in Minnesota that day. Given the totality of the evidence, the State believes that Chris was incorrect about what he said he heard that day. At the time Toni disappeared, her paychecks were being garnished for unpaid student loans and federal taxes.

Interview with the defendant (in-custody)

On April 7, 2015, the defendant was arrested for Toni Bachman's murder. He provided a Miranda-waived statement in which he denied killing Toni or having anything to do with her disappearance. He said that there were no coolers in the vehicle when they went to Verndale the week after Toni disappeared and that he had no idea how Toni's blood could have gotten in the root cellar. He said that he might have put a lock on the root cellar door when he first bought the house but that he did not change the lock after Toni disappeared. He denied cleaning the area around the root cellar after Toni disappeared. He also said that he does not recall getting a phone call from Toni the Monday after she disappeared.

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'S NAME:

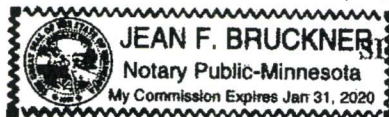
Brenda Brozik

COMPLAINANT'S SIGNATURE:



Subscribed and sworn to before the undersigned this 8 day of April, 2015.

NAME/TITLE:



JEAN F. BRUCKNER

Notary Public-Minnesota

My Commission Expires Jan 31, 2020

Jean F Bruckner
Notary Public

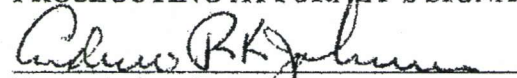
SIGNATURE:



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

Date: 04/07/2015

PROSECUTING ATTORNEY'S SIGNATURE:



Name: Andrew R. K. Johnson
Assistant Ramsey County Attorney
345 Wabasha Street North, Suite 120
St. Paul, MN 55102
651-266-3222/jh
Attorney Registration #286357



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.

SUMMONS

THEREFORE YOU, THE ABOVE-NAMED DEFENDANT, ARE HEREBY SUMMONED to appear on the ____ day of _____, 20__ at _____ before the above-named court at _____ to answer this complaint.

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

WARRANT

Execute in MN Only *Execute Nationwide* *Execute in Border States*

To the Sheriff of the above-named county; or other person authorized to execute this warrant: I hereby order, in the name of the State of Minnesota, that the above-named Defendant be apprehended and arrested without delay and brought promptly before the above-named 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.

ORDER OF DETENTION

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

Bail: \$250,000.00

Conditions of Release:

This complaint, duly subscribed and sworn to, is issued by the undersigned Judicial Officer this ____ day of _____, 20____.

JUDICIAL OFFICER:
NAME:
TITLE:

SIGNATURE:

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

COUNTY OF RAMSEY
STATE OF MINNESOTA

Clerk's Signature or File Stamp:

STATE OF MINNESOTA

Plaintiff,

vs.

NORMAN ALLEN BACHMAN JR.

Defendant.

RETURN OF SERVICE

I hereby Certify and Return that I have served a copy of this COMPLAINT upon the Defendant herein named.

Signature of Authorized Service Agent:



FINDINGS OF FACT

Probable cause found that defendant committed the offenses charged.

Ordered defendant's motion to dismiss denied.

Plea of not guilty to all counts entered.

Trial and hearing on all issues set.

Dated: _____

JUDGE OF DISTRICT COURT



DEFENDANT DATA / CHARGE SHEET – ATTACHMENT A

DEFENDANT NAME: NORMAN ALLEN BACHMAN JR.		DOB: 02/19/1962
Defendant alias name(s):	Norman Allen Bachman	Alias DOB(s):
Defendant last known address:	Current Address Unknown	
State ID:	MN98023788	
Fingerprint ID:	132496	
FBI ID:	780407JB8	
St. Paul PD ID:		
Offender ID:		

OTHER DEFENDANT / CASE IDENTIFIERS:		
Fingerprinted?	<input type="checkbox"/> No	<input type="checkbox"/> Yes
Handgun permit?	<input type="checkbox"/> No	<input type="checkbox"/> Yes (Issuing Agency:)
Location of violation:		
IF DRIVING OFFENSE:		
Driver's License	Number:	Issuing State:
License Plate	Number:	Issuing State:
Accident Type:	<input type="checkbox"/> No injury/no damage	<input type="checkbox"/> Property Damage
<i>check all that apply</i>	<input type="checkbox"/> Personal Injury	<input type="checkbox"/> Fatality
Blood Alcohol Concentration (BAC):		



FELONY WARRANT AND ORDER OF DETENTION COMPLAINT

CT NO	OFFENSE DATE	STATUTE TYPE	STATUTE NBR	STATUTE DESCRIPTION	OFFENSE LEVEL	MOC	G O C	AGENCY ORI CN NBR FUNCTION
1	04/25/1997 to 05/22/1997	Charge	609.19.2(1)	Murder - 2nd Degree - Without Intent - While Committing a Felony	F	H2801	N	Ramsey Co. Sheriff Dept. - LEC ORI - MN0620000 CN - 97011392 Charging
2	04/25/1997 to 05/22/1997	Charge	609.20.2	Manslaughter - 1st Degree - While Committing Gross Misdemeanor/Misdemeanor with Violence	F	H4901	N	Ramsey Co. Sheriff Dept. - LEC ORI - MN0620000 CN - 97011392 Charging