

STATE OF WISCONSIN                      CIRCUIT COURT                      DOOR COUNTY

STATE OF WISCONSIN  
Plaintiff,

DA Case No.: 2018DO000442  
Nicholas P Grode  
Court Case No.: 18-CF-132

**FILED**  
OCT 11 2018  
CLERK OF CIRCUIT COURT  
DOOR COUNTY, WI

vs.

**AMENDED CRIMINAL  
COMPLAINT**

RICHARD G PIERCE  
8856 Raspberry Lane  
Cheboygan, MI  
DOB: 04/18/1936  
Sex/Race: M/W

Defendant.

*For Official Use*

Sergeant Chad Hougaard of the Sturgeon Bay Police Department, being first duly sworn, states that:

**Count 1: FIRST-DEGREE MURDER**

The above-named defendant on or about Friday, September 05, 1975, in the City of Sturgeon Bay, Door County, Wisconsin, did cause the death of Carol Jean Pierce, with intent to kill that person or another, contrary to sec. 940.01(1) Wis. Stats., a Felony, and upon conviction shall be sentenced to life imprisonment.

**Count 2: DISINTERMENT OF DEAD**

The above-named defendant on or about Friday, September 05, 1975, in the City of Sturgeon Bay, Door County, Wisconsin, as a person not lawfully authorized, did convey away the remains of Carol Jean Pierce, contrary to sec. 155.10 Wis. Stats., a Felony, and upon conviction shall be punished by imprisonment in the state prison not more than 3 years nor less than one year or in the county jail not more than one year, or by fine not exceeding \$500.

**PROBABLE CAUSE:**

Given the following information and statements, your affiant concludes that on or about September 5, 1975 the defendant, Richard Gale Pierce, caused the death of his wife, Carol Jean Pierce, at the couple's home at the Sunrise Shores Trailer Park on Elm Street, in the City of Sturgeon Bay, Door County, Wisconsin. The defendant was the last person to see Carol Jean Pierce alive, had motive and opportunity to end her life, and benefitted from her demise in numerous ways.

Within this complaint the victim, Carol Jean Pierce, is referred to as Carol Jean Pierce, Carol Jean Fillion or Carol Jean. All of these names refer to the victim, Carol Jean Pierce.

The information and statements obtained from Officer Krimbill, Sgt. Chad Hougaard, Lt. Thomas Baudhuin (retired), former Chief of Police Michael Nordin (deceased), current Sturgeon Bay Chief of Police Arleigh Porter and Sergeant Greg Zager (retired) of the Sturgeon Bay Police Department, Richard Luell of the Wisconsin Department of Justice, and Trooper

Fonger of the Michigan State Police, referenced in this criminal complaint are believed to be truthful, accurate, and reliable in as much as said information and statements was prepared during the course of those officers' official duties.

The information and statements obtained from Chris Heil, John Hanrahan, Tony O'Neill, Marianne Flynn-Statz, Bob Quant, and Steve Daniels is considered truthful, accurate, and reliable given that this information was given in the course of their involvement with the Wisconsin Association of Homicide Investigators and after a review of the case and participation in a thorough briefing on the facts of this case.

The information and statements obtained from Carol Jean Pierce, Pauline Fillion, Brian Fillion, Sandra Bagge, Ronald Clark, Douglas Lundberg, Rene Zimmer, Kris Zimmer, Richard Hueftle, David Reed, Stefen Venckus, Roy Carne, Mary Carne, Mary Ann Metsker-LaViolette, Betty Cefalu, Kent Kramer, Donald Augustson, Rose Marlene-Box, Gail L. Box, Chad Box, Elaine Reinhardt, Alice Maw Wiltse, and Richard A. Shulaw referenced in this criminal complaint are believed to be truthful, accurate and reliable in as much as said information and statements was reported based on what those witnesses personally observed.

The information and statements obtained from Carol Jean Pierce's previous divorce filings and from the safe deposit box records of the Citizens National Bank of Cheboygan, Michigan are considered to be truthful, reliable and accurate as those records were created in the normal and ordinary course of business.

---

### **The Personal History of Carol Jean Pierce**

Carol Jean Pierce was born Carol Jean Fillion on December 4, 1939. Her parents were Raymond Joseph Fillion and Pauline Elnora (Knapp) Fillion. According to her mother's grand jury testimony, Carol Jean was in the band and played clarinet while she was in high school. Carol Jean graduated from high school on June 12, 1957. Her mother stated Carol Jean had no history of "mental instability," had never been committed to a mental institution, and had "above average" intelligence.

### **The Prior Marriages of Carol Jean Pierce**

At the time of Carol Jean's disappearance, she had been married three times in her life. Carol Jean's first marriage was to Danny Dean Aungst, and the two were married on January 4, 1957. Carol Jean was 18 years old at the time and had not graduated high school.

The marriage did not last long, and a Bill of Complaint was filed on June 18, 1958 by Mr. Aungst. Within the complaint, Mr. Aungst averred that Carol Jean had disregarded "the solemnity of his marriage vows" and had pursued a course of action amounting to "extreme and repeated cruelty".

These acts of "extreme and repeated cruelty" included allegations that Carol Jean did "on numerous occasions" inform Mr. Aungst that "she no longer loves him and wishes to be free of this marriage." Mr. Aungst further averred that Carol Jean "openly seeks the company of other men and goes out with them," and that when Carol Jean and Mr. Aungst were together there

would be "constant bickering and nagging on the part of (Carol Jean) and nothing (Mr. Aungst) can say seems to alleviate this condition." Carol Jean did not respond to these allegations and the Order of Default was signed on September 26, 1958.

Less than two years later, Carol Jean married again, this time to a Mr. Jock Dee Clark. The marriage took place on March 19, 1960, and lasted for approximately four years. The couple produced one son, Mark Clark. The complaint in this divorce, filed by Mr. Clark, also alleged that Carol Jean had "practiced acts of extreme cruelty" towards her husband. Specifically, Mr. Clark stated that Carol Jean "had a dominating disposition, constantly insisting upon having her own way, and if interfered with becomes abusive." The complaint also averred that Carol Jean "(s)howed no love or affection for (Mr. Clark) for a long period of time," that Carol Jean "constantly nags and criticizes (Mr. Clark) without just cause," that Carol Jean called Mr. Clark "vile, obscene and vulgar names without cause," and that she "did not regularly get his meals and neglected him by being gone for long periods of time without explanation."

Carol Jean did answer Mr. Clark's allegations. Within her answer, she denied practicing acts of extreme cruelty towards Mr. Clark, and stated that the reason she did not always have his meals prepared was due to his coming home at irregular intervals. Carol Jean further denied ever being gone for long periods of time without explanation, denied associating with other men, and denied hanging around bars and taverns, save for one occasion where she was working until 2:30 a.m.

---

The divorce was finalized on April 10, 1964. No alimony was granted to Carol Jean, and Mr. Clark was given custody of the child. Carol Jean was awarded the home in Battle Creek, the stereo set, the television set and the car in her possession.

Carol Jean was likely a victim of domestic violence during the relationship with Clark. On June 23, 2009, Lt. Baudhuin had a conversation with Jock Clark's brother, Ronald Clark. Ronald stated that he recalled a post-divorce incident where he observed Carol Jean's face and upper-arms to be severely bruised and swollen. Ronald stated Carol Jean informed him that the beating came from Jock during a post-divorce custody argument.

### **The Marriage of Richard Gale Pierce and Carol Jean Fillion**

The defendant and Carol Jean were married on September 3, 1966. At that time, the defendant was a member of the United States Coast Guard (USCG) and as a result, Carol Jean and the defendant relocated frequently as the defendant was reassigned to new and different duty stations. During the early 1970's, the defendant and Carol Jean were stationed in Sicklerville, New Jersey.

The defendant reported for duty aboard the USCG Cutter "Mesquite" on July 23, 1973. At this time, the Mesquite's home port was Sturgeon Bay, Wisconsin. After the move, Carol Jean and the defendant lived in a trailer home located at the Sunrise Shores Trailer Park on Elm Street, in the City of Sturgeon Bay, Door County, Wisconsin.

### Observations of the Pierce Marriage

During the time the defendant and Carol Jean lived in Sturgeon Bay, numerous people observed the couple in social situations. In a 2005 interview with Lt. Baudhuin, Mr. Rene Zimmer, a crew member on the Mesquite at the same time as the defendant, stated he had numerous opportunities to speak with both the defendant and Carol Jean in social settings. Mr. Zimmer stated the defendant and Carol Jean seemed to bicker more than most couples. Mr. Zimmer stated that both the defendant and Carol Jean would frequently throw verbal barbs at each other.

Lt. Baudhuin also made contact with Mr. Zimmer's wife, Kris Zimmer. Mrs. Zimmer stated that Carol Jean herself informed her that her marriage to the defendant was volatile and the couple often argued.

At times, Carol Jean and the defendant would get into heated arguments, even in the presence of other people. In a 2005 interview with Lt. Baudhuin, Richard Hueftle, an acquaintance of the defendant, stated he recalled one specific instance where he visited the Pierces when they lived in Sturgeon Bay. Hueftle was a guest of the Pierce's and stated that while at their home the defendant and Carol Jean got into a "heated argument" at around 4:00 a.m. Hueftle stated the argument was severe enough that he waited until the Pierces had gone to sleep and then snuck out of their home.

---

It is likely that these arguments were the result of a serious incompatibility between Carol Jean and the defendant. In a 2005 interview with Lt. Baudhuin, Stefen Venckus, a former shipmate of Pierce, who served 18 months with the defendant on the Mesquite, stated he often socialized with the defendant and Carol Jean, and described Carol Jean as the "suspicious type". Venckus stated he felt Carol Jean did not trust the defendant and his commitment to their marriage. Further, in a 2010 interview with Lt. Baudhuin, Mr. Douglas Lundberg, the Executive Officer aboard the Mesquite in 1975, stated he sensed the Pierce marriage was not doing well. Mr. Lundberg also stated that Carol Jean had the type of personality that would probably drive a guy like the defendant "nuts".

In public, witnesses did not view the defendant as the primary aggressor. In 1986, Officer Krimbill of the Sturgeon Bay Police Department spoke to Mr. David Reed, also of the Mesquite. Mr. Reed stated he was good friends with the defendant and had observed the defendant and Carol Jean to have many verbal arguments during the time he knew them. Mr. Reed stated that Carol Jean was the aggressor in most of these arguments and he described the defendant as being "wimpy".

Additionally, on September 1, 2004, Brian Fillion, Carol Jean's brother, emailed Lt. Baudhuin regarding an interesting situation he had observed between Carol Jean and the defendant. Brian stated that in Christmas 1973, he had not seen Carol Jean for 2 or 3 years, and wanted to spend Christmas with her, so he drove over to Sturgeon Bay on Sunday, December 23, 1973 and arrived in the afternoon.

Brian stated that soon after arrival, Carol Jean told him and his wife the defendant was on duty and the ship, the Mesquite, was in Chicago. Brian stated that Carol Jean had heard the Mesquite was on its way home to Sturgeon Bay and that all night long on December 23 Carol kept getting calls from other wives to find out if the ship would be home that night. Even the

ship commander's wife would call Carol Jean to find out what was taking place. Brian recalled that at some point, the defendant called to let Carol Jean know where they were and he remembered that Carol Jean didn't believe the defendant, and questioned him as to where the Mesquite really was.

Brian stated the ship came in early morning on December 24 and he picked the defendant up at the pier between 8 and 9 in the morning. Brian stated it was a normal business day so he and the defendant went right to a department store in Sturgeon Bay so the defendant could buy a Christmas present for Carol Jean. Brian stated the defendant informed him he had not had any sleep in nearly 2 days.

Despite the defendant's weary state, Carol Jean questioned him soon after they got home about where the ship had been, and when. Brian stated that Carol Jean basically accused the defendant of lying to her during his call the night before. Brian specifically remembered how the defendant remained very calm during this "interrogation" and recalled being quite surprised at how intense Carol Jean was trying to get the defendant to admit that her information was more accurate than his account of the ship and its location on the night of December 23.

Brian stated that after everything calmed down, they had dinner, some drinks, and played cards until at least 1:00 am. Finally, the defendant stated he was tired and needed to call it a day. Brian noted that if he had not slept in 2 days, was interrogated at home, consumed a couple or more drinks after a big dinner his night would not have lasted as long. Brian noted that the defendant showed extreme control, when control should have been very hard to maintain.

### **History of Abuse Between the Defendant and Carol Jean**

The defendant was not always able to control his emotions as well as he did while being around Carol Jean's brother. While the defendant and Carol Jean resided in Sicklerville, New Jersey they lived next door to a Mrs. Sandra Bagge. On May 6, 2005, Bagge informed Lt. Baudhuin that during the time she resided next to the defendant and Carol Jean, Carol Jean confided in Bagge that the defendant had beaten her the night before. Mrs. Bagge noted that Carol Jean's face was badly bruised and that Carol Jean told her that the bruises were a result of the beating.

Mrs. Bagge was not the only person to observe Carol Jean with bruises. In 2007 Lt. Baudhuin interviewed Mrs. Mary Carne. Mrs. Carne stated she lived in the same mobile home park as the defendant and Carol Jean and that she knew Carol Jean. Mrs. Carne stated that she worked in the medical field for over 35 years as an x-ray technician and that during the course of her career she worked with hundreds of people who required x-rays following a physical assault.

Mrs. Carne stated that sometime in 1973 or 1974 she was having a conversation with Carol Jean in Carol Jean's yard when she noticed a serious bruise or a "shiner" on Carol Jean's eye. Mary stated she asked Carol Jean how the injury occurred and that Carol Jean replied that she had fallen. Mary stated that based on her experience in the medical field, she strongly believed the bruise was the result of a physical assault.

### **Carol Jean's Statement's that She Believed Richard Gale Pierce Would Kill Her**

The defendant's abuse concerned Carol Jean enough that she informed one of her neighbors, Mary Ann Metsker-LaViolette, that she believed the defendant was going to kill her. Mrs. Metsker-LaViolette spoke to Lt. Baudhuin on numerous occasions and stated that while they lived in Sturgeon Bay, she visited Carol Jean on 6 separate occasions, and that on at least 3 separate occasions, Carol Jean commented "I think he's going to kill me," apparently referring to the defendant. Mrs. Metsker-LaViolette stated that Carol Jean had also informed her that because of this fear she wished she could go to a place where no one would find her.

### **Carol Jean's Pre-Disappearance Behavior Explained Through Letters to her Mother**

Despite the volatility of the marriage, the abuse, and Carol Jean's concerns that the defendant was going to kill her, she remained in Sturgeon Bay and communicated often with her mother. The communications took the form of periodic letters and phone calls. On June 24, 1986 Mrs. Fillion informed Chief Porter, then a Sergeant, that her conversations with Carol Jean would "run in a series. Like, every week for a while and then she wouldn't call for a while."

Mrs. Fillion provided law enforcement with the most recent of these letters. The letters are dated and were from November 8, 1973; October 14, 1974; November 1, 1974; January 10, 1975; May 7, 1975; May 25, 1975; July, 23, 1975 and August 12, 1975. Mrs. Fillion also provided a letter Carol Jean wrote to a Paul and Betty Grindol, relatives of her second husband, Jock Clark. This letter to the Grindol's is dated August 11, 1975. The last contact Mrs. Fillion ever had with Carol Jean was a phone call that took place on August 19, 1975.

Within these letters, Carol Jean spoke fondly of her husband and detailed many of her plans for her life after the post-retirement move to Michigan. Save for the May 25, 1975 letter, Carol Jean signed all of her letters "Love Carol + Gale."

The work Carol Jean was putting into their Cheboygan home was prominent in the letters. In the November 1, 1974 letter, she stated, "We have another section of cement in and have one more to go, but that will have to wait until spring. Royer's gave us a bunch of young pine trees so we planted them all along one side of the lot. They are going to give us more. We also transplanted a white birch that is doing great so far, a big maple that we aren't sure of yet and a beautiful long needle pine that is doing real good. We had a 24' x 60' section on the lot filled and covered with white stone."

Lt. Baudhuin would later learn that Carol Jean went so far as to sell her car in preparation of the move, using the money to help build the garage in Cheboygan. Carol Jean confirmed this in a conversation with an acquaintance, Mrs. Betty Cefalu, where she informed Cefalu that she sold the car because there would be no need for the couple to have two vehicles after the defendant's retirement.

Carol Jean also explained how excited she was for the move. In the May 7, 1975 letter, Carol Jean tells her mother, "(a)ll we have to do now is get the trailer up there and put up a mail box. I can hardly waite(sic). The moving date is set for Sept. 22nd. I think Gale is getting as anxious as I am."

In the August 12, 1975 letter, Carol Jean went so far as to invite her mother to the property, writing, "it sure would be nice for you to meet us up there for a week-end." At this point in time the defendant and Carol Jean had a septic tank on the property, but Carol Jean noted that when they were there they lived "very crudely" noting that, "we do have water and the sewage and the electricity, but we go potty in a bucket and then dump it in the septic tank. We take our baths in the shed or in the new garage now."

Carol Jean was also in the process of purchasing a custom-made Coast Guard Warrant Officer's ring for the defendant as a surprise gift for his retirement. In the May 25, 1975 letter Carol Jean also explained her plans to surprise the defendant with the ring, and the trouble she went through finding the money to pay for it. In the letter Carol Jean explained that the price of the ring is \$100 and she saved for it by putting 35¢ in each time she did a load of wash.

Despite her efforts, Carol Jean was not able to save the full amount for the ring and only managed to save \$45, so she asked her mother for a small loan to allow her to pay for the ring without the defendant's knowledge. While Carol Jean and the defendant had \$500 in the checking account, Carol Jean noted that she would not be able to take \$100 out because of the defendant's oversight of their finances. Carol Jean's concern over the defendant's oversight seemed as though it would have existed after she received the loan from her mother, as she went on to state "...I would get it back to you in small amounts that he won't notice."

---

Carol Jean also noted her concerns over the costs of moving the trailer to Cheboygan. In the August 12, 1975, letter Carol Jean wrote that the trailer would go "...via the Mackinaw Bridge. The car ferry would be fun, but the charge for the ferry alone would be terrible...over \$600 to go that way and the Coast Guard would only pay \$200 of the bill. It sure would be fun though." Nowhere in the letter does Carol Jean mention her and the defendant having saved \$1,000 for the move to Cheboygan.

Carol Jean also spoke about how connected she was to a new pet cat. In both the August 11, 1975 letter to the Grindols and in the August 12, 1975 letter to her mother, Carol Jean wrote about how someone "...dropped off a male kitten Thursday night." Carol Jean told the Grindols that "...no one has claimed him, so I guess we're stuck with him." Carol Jean wrote to her mother, "We sure hadn't planned on an adopted little one, but it seems we have one."

Carol Jean also spoke about some of her plans for the future. In the August 12, 1975 letter Carol Jean told her mother that, "(t)he bridge walk sounds like fun. We never had a chance to do it, maybe next year."

There was also discussion about how much Carol Jean valued the truck she and the defendant owned. In the August 12, 1975 letter, Carol Jean stated, "The truck will surprise you. It still looks like a new truck. Many have asked if it was a '75, and many, many more have asked to buy it. You know we sold the car, but just won't part with the truck."

Carol Jean also went into detail about a disagreement she and the defendant were having with the Cordwood Point Association. Specifically, Carol Jean explained that the Association used their money to install a 50 foot boat dock. In the July 23, 1975 letter, Carol Jean stated, "We are out for blood now. The Association used our money to put in a 50 foot boat dock there in Cordwood. We were never consulted about it, but they used our money." Carol Jean went on

to state that she and the defendant had gone so far as to report the building of the dock to the Army Corps of Engineers.

Carol Jean went on to state that she and the defendant had even discussed selling their property stating, "(i)n the spring we will put it up for sale. The whole thing, including the trailer..." In her final letter from to her mother, on August 12, 1975, Carol Jean noted that she hoped "...to sign the papers this next week-end to put the whole thing up for sale."

Despite this apparent confrontation and their supposed desire to sell, Carol Jean did not show any hesitation in taking on the Association, even if she had to involve the Army Corps of Engineers to do so. In the August 12 letter Carol Jean told her mother, "(o)h, the Army Corps of Engineers is now after Cordwood Point for...the illegal dock. It is in violation of federal law...The fine for having the illegal dock...is \$10,000.00 per day. How about them apples?"

Carol Jean also allowed the defendant to place some of her most valuable possessions in a safe deposit box in Cheboygan, Michigan. In the July 23, 1975 letter to her mother, Carol Jean explained what was in the safe deposit box. Carol Jean stated that all of their deeds, titles, and receipts were in the box, along with their marriage license, their birth certificates and the defendant's military papers. There was also a ring from Carol Jean's prior marriage to Jock Clark, appraised at \$1,200 in value in the box with the other valuables.

~~Within these letters Carol Jean also noted that she and the defendant had taken out a life insurance policy on themselves, paid one year in advance. Carol Jean explained that the total value of the policy was \$25,000. Carol Jean informed her mother of the company, policy number, agent and effective dates of the policy. Carol Jean went on to inform her mother about their banking information and provided the names and account numbers of her and the defendant's savings accounts as well as the information on 3 of their Certificates of Deposit.~~

### **Carol Jean's Pre-Disappearance Behavior Explained Through Other Members of the Community**

Carol Jean also seemed excited about her future to other members of the community. In her May 2, 2005 conversation with Lt. Baudhuin, Mrs. Betty Cefalu stated that both the defendant and Carol Jean spoke highly of their pending retirement, and both seemed excited about their planned move back to Michigan. Mrs. Cefalu even recalled that in March of 1975, she and her husband had the Pierces over for a visit so that the Pierces could observe an addition they had done to their mobile home. Learning about the addition was important to the Pierces as they were planning on putting an addition on their trailer once it was moved back to Michigan.

Mrs. Cefalu stated that Carol Jean appeared to be very much in love with the defendant and she believed that Carol Jean would never walk out on the defendant as the defendant was stating.

Lt. Baudhuin also made contact with Mr. Paul Grindol. Grindol stated he first met Carol Jean when she married his nephew, Jock Dee Clark. Grindol stated Carol Jean and the defendant had been out to Oregon to visit him sometime during 1974-75. Mr. Grindol stated that as far as he could tell, the defendant and Carol Jean appeared happily married and both Carol Jean and



the defendant expressed a great deal of enthusiasm over their upcoming retirement plans and were looking forward to their move back to Michigan.

Carol Jean's own actions show that she was fully committed to the move to Cheboygan as she closed her savings account at the 1st National Bank in Sturgeon Bay on June 23, 1975.

### **Richard Pierce's Pre-Disappearance Behavior Explained Through Other Members of the Community**

According to other members of the community, the defendant did not have such a favorable view of Carol Jean. On May 18, 2005, Lt. Baudhuin spoke to Mr. Kent Kramer. Kramer was the Engineering Officer on the Mesquite from 1974 to 1976 and thus served with the defendant. Kramer stated that while on the ship, the defendant would often talk down about Carol Jean. Kramer stated he got the impression that the defendant did not like Carol Jean and that he was not happy in the marriage.

Kramer's impression of the defendant went so far as to make him believe that the defendant could have murdered his wife. In his 2005 conversation with Lt. Baudhuin, Mr. Kramer recalled the passing of Allen Rosebrook's wife. Lt. Baudhuin notes that in late 1974 the ship's Captain, Allen Rosebrook, was involved in an incident at the Rosebrook home where his wife fell down the basement steps. Mrs. Rosebrook later died from her injuries. Mr. Kramer noted that he believed the circumstances surrounding Mrs. Rosebrook's disappearance were highly suspicious, as was the disappearance of Carol Jean. Mr. Kramer went on to note that he got the impression that the defendant felt that "he got away with it – so could I".

Upon hearing of the death of Rosebrook's wife, the defendant himself noted that he felt Rosebrook benefitted from the tragedy. In his 2010 statement to Lt. Baudhuin, Mr. Lundberg stated that shortly after Mrs. Rosebrook passed on, he heard the defendant say, "(t)hat was a pretty good deal, Rosebrook got rid of his wife."

### **Citizens National Bank Safe Deposit Box and Financial Information**

Between February 18, 1975 and September 12, 1975, the defendant made numerous trips to a safe deposit box at the Citizens National Bank in Cheboygan, Michigan. After opening the box on February 18, 1975, the defendant visited this safe deposit box on June 4, 10, and 20th, 1975. The Cheboygan safe deposit box is located more than 300 miles from Sturgeon Bay.

According to Carol Jean's letters, it was her understanding that the safe deposit box simply contained their important papers, their birth certificates, the defendant's military papers, and a ring from Carol Jean's prior marriage. Yet, the defendant took great risks to access this safe deposit box on June 4 and June 10, 1975. During these times the defendant was not on leave, and the Mesquite could have been called out for duty while he was away. Were this to happen, the defendant would need to be able to return to the ship in approximately 2 hours, something he would not have been able to do if he was in Cheboygan, Michigan.

Missing such a movement could have serious consequences. Lt. Baudhuin confirmed with Mr. Lundberg that should the Mesquite have been called out during one of these times, and the

defendant been unavailable, the defendant could have faced disciplinary actions and perhaps demotion. Despite these risks the defendant visited the safe deposit box while not on leave.

The defendant continued to make trips to the box, even after Carol Jean disappeared on September 5, 1975. The defendant would later tell investigators he went to the bank to "see if Carol Jean had been there" however, the defendant signed the signature card, indicating that he entered the box at that time, something he would not have had to do unless he actually entered the box.

It is important to note that there is no way Carol Jean could have accessed the box after her disappearance, despite the fact it contained some of her most valuable possessions, as both keys were later returned to the bank. Lt. Baudhuin was able to confirm this by gaining access to the safe deposit box information at Citizens Bank in Cheboygan, Michigan. These records show that at the time the safe deposit box was opened, the defendant was issued two keys. These records also show that at the time the box was closed the defendant returned two keys as well.

### **Other Noteworthy Pre-Disappearance Events**

Lt. Baudhuin also learned of an incident where the defendant learned that Carol Jean had been "hitting on" one of his fellow Mesquite crew members. In his 2005 statement to Lt. Baudhuin, Mr. Kramer recalled such an incident. Kramer stated that at the time of the conversation, he was onboard the Mesquite, in his stateroom, which was right across the hallway from the defendant's. Kramer stated that at this time, he was visiting with one of the engineers, Roy Carne, another crew member of the Mesquite.

Kramer stated that during the visit, Carne was telling him about an incident where Carol Jean was "hitting on" Carne. Kramer stated that when this conversation began he was certain the defendant was not in his room; however, when the conversation ended, both Kramer and Carne observed the defendant to have returned to his stateroom.

Kramer later stated that after he noticed the defendant in his stateroom, he observed the defendant's expression to be "stone faced" and that the defendant had no expression at all and was just staring. Kramer stated that the defendant did not acknowledge his or Carne's presence as they left the stateroom. Kramer stated he was certain the defendant heard the statement about Carol Jean hitting on Carne.

### **The Disappearance of Carol Jean Pierce**

On or about September 2, 1975, the Mesquite received orders to proceed to Detroit, Michigan to assist with a barge. After getting underway, those orders were changed and the Mesquite was re-routed to the Chicago area.

The Mesquite moored in Chicago, Illinois the night of September 3, 1975. Mr. Reed informed officers that once the ship moored in Chicago, he, Stefan Venckus, and the defendant went ashore for pizza. Reed stated that during this time, the defendant called Carol Jean and informed her that the ship had just docked in Detroit. Reed stated that after overhearing the

conversation, he asked the defendant why he didn't tell his wife that the ship's orders had been changed at the last minute. Mr. Reed stated that the defendant replied, "she wouldn't believe me anyway."

Betty Cefalu stated that she observed activity at the Pierce residence while the Mesquite was on the Chicago-Milwaukee run. Cefalu spoke to Sergeant Porter in 1981 and stated that while the Mesquite was away, she observed the Pierce's only vehicle at the Pierce residence. Cefalu later noticed the vehicle to not be home; however, Cefalu did notice the vehicle at the home later, indicating that someone was driving the Pierce vehicle while the Mesquite was away.

The Mesquite returned to Sturgeon Bay on Friday, September 5, 1975 at 6:15 p.m. Crew members, including the defendant, were given "liberty" and allowed to leave the ship.

The following day, September 6, 1975, a Saturday, the defendant returned to the ship and told Mr. Reed that Carol Jean had "taken off." The defendant informed Reed that Carol Jean had taken all of their money out of their savings account. Mr. Reed recalled that the defendant told him Carol Jean had taken approximately \$20,000 out of their savings.

That following Monday, September 8, 1975, the defendant returned to the Mesquite and told multiple shipmates that Carol Jean had left him. Word of Carol Jean's supposed "departure" reached Betty Cefalu through her husband, who has since passed away. Mrs. Cefalu stated that on either Tuesday, September 9, 1975 or Wednesday, September 10, 1975 she and her husband went to the Pierce mobile home to see how the defendant was doing.

Mrs. Cefalu stated that once she entered the home, she immediately saw Carol Jean's purse sitting on the kitchen counter. As she further observed the home, Mrs. Cefalu noticed numerous other items of Carol Jean's still present. Mrs. Cefalu noted that Carol Jean was the owner of a large record collection and stereo and stated that the entire collection and the stereo were still in the Pierce home. Mrs. Cefalu also stated that Carol Jean's cat was still in the residence. Mrs. Cefalu further stated that while in the Pierce home she used the washroom and that she noticed numerous make-up and cosmetic items still present as well.

Despite Carol Jean's disappearance, the defendant's retirement party proceeded as scheduled on September 19, 1975. The party was aboard the Mesquite. Both the defendant's mother and Pauline Fillion were in attendance. Pauline Fillion would later state that the defendant first called her to invite her to the party, but after Mrs. Fillion asked to speak to Carol Jean, the defendant stated that Carol Jean was gone and that he thought Carol Jean was with her.

The defendant's move to Cheboygan also proceeded as scheduled on September 22, 1975. The defendant moved his mobile home from Sturgeon Bay, Wisconsin to 8856 Raspberry Lane, Cheboygan, Michigan.

On October 14, 1975, having not heard from her daughter since August 19, 1975, Pauline Fillion wrote a letter to former Sturgeon Bay Chief of Police Howard Larson. Mrs. Fillion wrote, "I am concerned about my daughter Carol Jean Pierce, age 35, who has been missing from her Sunrise Shores trailer home since Sept 8, 1975. Her husband Richard G. Pierce notified me the night of Sept. 11-1975. He states he notified your department Sept 15 or 16." Mrs. Fillion continued, "My last conversation with Carol was Aug. 19-1975. There is no reason to believe she would not have called me by now if she could."

Since Carol Jean's disappearance, numerous efforts have been made to locate either her or her remains. None have been successful. The area around the Pierce's mobile home in Sturgeon Bay was searched by police in October of 1975 and later searched with the use of trained cadaver dogs. Neither search revealed any indication as to Carol Jean's whereabouts. Since Carol Jean's disappearance, she has had no contact with anyone known to law enforcement. This includes her son, Mark Clark; her brother, Brian Fillion; her sister, Jan Rowley and every other individual referenced in this complaint or ever interviewed by law enforcement. Carol Jean's mother, Pauline Fillion, has since passed away and Carol Jean never made contact with her mother after their phone call on August 19, 1975.

Additionally, the consumer reporting agencies, Transunion, Equifax, and Experian have been checked and there has been no activity by a Carol Jean Pierce after September 1975. Further, there has also been no activity with the National Crime Information Center (NCIC), the Social Security Administration, the National Insurance Crime Bureau, the International Criminal Police Organization (INTERPOL), or the Canadian authorities. Officers have also checked with the Department of Transportation in every state, as well as the U.S. Passport Office and no information concerning Carol Jean Pierce was received.

Lt. Baudhuin also spoke to Lawrence Burzynski of the National Insurance Crime Bureau. Lt. Baudhuin provided Burzynski with the identification information on Carol Jean Pierce. Burzynski later informed Lt. Baudhuin there have been no insurance claims or entries for Carol Jean Pierce or any of her known aliases, or under Carol Jean's social security number.

#### **Post-Disappearance Behavior by Richard Gale Pierce**

Numerous members of the community observed the defendant after Carol Jean's disappearance and noted that he did not seem affected by the loss whatsoever. Mr. Rene Zimmer stated that he did not notice any marked change in Pierce's personality or actions between Carol Jean's disappearance and his retirement.

In his 2005 conversation with Lt. Baudhuin, Mr. Kent Kramer also stated that the defendant's demeanor did not change whatsoever after Carol Jean's disappearance and that it appeared that the defendant could not care less about Carol Jean's well-being.

On June 8, 2005 Lt. Baudhuin made contact with Mr. Donald Augustson, the Chief Electrician onboard the Mesquite during the time the defendant was stationed aboard the ship. Mr. Augustson stated he knew the defendant, but had only met Carol Jean on one or two occasions. Mr. Augustson stated that shortly after Carol Jean's disappearance, he noted that the defendant did not appear at all upset about Carol Jean. Mr. Augustson stated that the defendant looked calm and normal and felt that the defendant was not reacting the way one would expect under the circumstances.

Additionally, Betty Cefalu noted that when she was at the residence, shortly after Carol Jean's disappearance, the defendant did not seem to be upset at all by his wife's disappearance

Mr. Reed did notice a change in the defendant's behavior after Carol Jean's disappearance. Mr. Reed told Officer Krimbill that prior to Carol Jean's disappearance, he felt the defendant

was "wimpy;" However, approximately one month after Carol Jean disappeared, Mr. Reed and Mr. Venckus ran into the defendant while the ship was in Michigan. Mr. Reed stated that the defendant seemed like a different person and not as "wimpy" as before.

Other members of the community observed Mr. Pierce to behave suspiciously when the subject of Carol Jean was brought up in his presence. Mr. Augustson stated that approximately one or two months after Carol Jean disappeared he was at the Masonic Lodge in Sturgeon Bay when he overheard two officers discussing the Carol Jean investigation. Mr. Augustson stated he listened to this conversation as it involved the defendant, who had been a shipmate of his. Mr. Augustson recalled that the officers were discussing the possibility of excavating the area around the Pierce mobile home in an effort to discover Carol Jean's remains.

Mr. Augustson stated that approximately 10 years prior to his 2005 conversation with Lt. Baudhuin he attended a USCG reunion that was held at the Captain's Inn restaurant in Sturgeon Bay. Mr. Augustson stated that the defendant was at that reunion, and Mr. Augustson approached him and told him about the police officer's conversation that he overheard back in 1975. Augustson stated that after he informed the defendant of this, the defendant said nothing and just stared at him with a "shit eating grin" on his face without saying anything.

In 2004, Brian Fillion stated to Lt. Baudhuin that he also observed the defendant act suspiciously when he asked the defendant about Carol Jean. Brian stated that on January 20, 1976 he drove to Cheboygan to see the defendant with the "express purpose of talking to him about Carol."

Brian stated that after he and the defendant visited for a while, he asked the defendant if he knew what happened to Carol Jean. Brian told Lt. Baudhuin that he looked the defendant straight in the face and asked him if he had any idea about what happened to Carol Jean. Brian said the defendant responded that he did not, but that he observed the defendant's facial expression change took an almost sheepish look, and his face appeared either flushed, or red in color.

### **The Third Marriage of Richard Gale Pierce**

Shortly after Carol Jean disappeared the defendant met the woman who would become his third wife. In early October 1975 the defendant met Rose Marlene Box at the Vernon Bar. The defendant and Rose were married on June 24, 1978.

### **THE STATEMENTS OF RICHARD GALE PIERCE**

#### **Initial Version, Provided to Mr. Reed on September 6, 1975**

In his statement to Officer Krimbill, Mr. Reed stated that the day after the Mesquite returned to Sturgeon Bay, September 6, 1975, the defendant came to the ship and told him that Carol Jean had "taken off." The defendant informed Mr. Reed that Carol Jean had taken all of their money out of their savings account. MR. Reed believed the defendant told him Carol Jean had taken approximately \$20,000 out of their savings.

**Second Version, Initially Provided to Sturgeon Bay Chief of Police Larson on October 18, 1975**

In an October 18, 1975 statement to former Chief Larson, the defendant stated that Carol Jean had taken off on September 8, 1975 from their trailer at Sunrise Shores. The defendant further stated that Carol Jean had taken \$1,000 in cash that they had saved to move back to Michigan. The report stated that the defendant appeared angrier over the missing money than the fact that Carol Jean had walked out on him.

On April 28, 2005, Lt. Baudhuin made contact with Stefen Venckus and was told that while the two were on the Mesquite, between September 8, 1975 and the retirement ceremony held on September 19, 1975, the defendant told him Carol Jean had left him.

On or about November 14, 1975, the defendant sent Richard Hueftle a letter which stated, "Hi Rick, Got a problem -- maybe you can help or come up with some part of an answer. Over 2 months ago Carol packed up and left while I was at work. I've checked with friends-relatives, and hospitals to no avail. There was no argument or fight beforehand, just the usual aggravation and pressures of the move. It's had me and her mother really racking our brains trying to figure out where or why. If she should by chance contact you -- please call me at..."

---

**Interview with Sturgeon Bay Chief of Police Michael Nordin on December 9, 1982**

On December 9, 1982, the defendant was interviewed by Chief Nordin and Sergeant Porter. During this interview the defendant stated that on the morning of September 8, 1975, he had coffee with Carol Jean prior to leaving for work. The defendant stated that when he returned home that same afternoon, Carol Jean was gone.

The defendant stated that he specifically recalled that all of Carol Jean's warm weather clothing was missing from the home as well as all of her undergarments. Chief Nordin noted that the defendant was emphatic that Carol Jean had taken all of her summer clothing; However, Chief Nordin noted that later in the interview the defendant stated that Carol Jean had taken "some or all of her summer clothing." The defendant could not recall whether any of her shoes were missing.

The defendant went on to state that his wife took approximately \$1,000 in cash, which he had hidden underneath some blankets on a shelf in a bedroom closet. The defendant stated that the cash consisted of small bills with an equal number of \$1, \$5 and \$10 bills. The defendant stated none of the bills were larger than a \$10 bill and that he accumulated the money while he was in the service and that he stored it on the ships he was assigned to until 3 to 4 months prior to his wife's disappearance. The defendant stated that he had never told his wife about the money and that she must have discovered it on her own and taken it.

Chief Nordin also questioned the defendant about this \$1,000 and the defendant stated that the approximate \$1,000 Carol Jean took was stored in a standard-size plain white envelope. Chief Nordin determined that if the break-down in denominations that Pierce provided was accurate, and that it was all stored in a single white envelope, there would have been 150 to

200 separate bills. Chief Nordin further noted that it would be quite unlikely that 150 to 200 separate bills could be stored in a plain white letter envelope.

The defendant also stated the found Carol Jean's wedding band in one of the dresser drawers after she disappeared. The defendant stated he gave the ring to his daughter from a previous marriage.

The defendant stated he didn't make any effort to locate his wife on the day she disappeared because he thought she might return. The defendant stated that on the day Carol Jean left, or the very next day, he telephoned his mother-in-law, Pauline Fillion, in Lansing, Michigan to see if his wife was there. In her letter to Chief Larson, Pauline Fillion stated the defendant contacted her on September 11, 1975.

The defendant went on to state that within a day or so of Carol Jean's disappearance, he telephoned the local taxi company to determine if his wife was transported anywhere by taxi on September 8, 1975.

The defendant stated he also called Door County Memorial Hospital and several Green Bay hospitals. The defendant stated he obtained the telephone numbers for the Green Bay hospitals from his Sturgeon Bay telephone directory and that he had his phone records that would reflect where the calls were originated. Chief Nordin, Sergeant Porter, and Michigan State Police Trooper Fonger later went with Pierce to his residence in Cheboygan, Michigan. At his residence the defendant stated that the telephone records for that period were missing, although the defendant did have the phone records for the months of August and October, the months previous and subsequent to the missing record.

Further, Sgt. Porter reviewed a 1975 Sturgeon Bay telephone directory and neither the white pages nor the yellow pages of the directory listed any Green Bay hospitals.

The defendant also claimed that he had filed a missing person's report with the Sturgeon Bay Police Department within several days of his wife's disappearance and that he made the report in person at the Door County Safety Building. The defendant stated he also went to the Safety Building a second time but did not know exactly when. The defendant stated that on one of the occasions he spoke to an "elderly gentleman."

The defendant also stated he drove to Cheboygan, Michigan the weekend after his wife disappeared to see if she was there. The defendant stated he drove to Cheboygan on the Friday after Carol Jean's disappearance, which would have been September 12, 1975 and that he left at approximately 12:00 p.m., and drove back to Sturgeon Bay the following Sunday, September 14, 1975. Pierce stated he did not transact any business in Cheboygan that weekend and that he stayed at his property outside the Cheboygan city limits.

Chief Nordin also noted that he found it highly unlikely that the defendant traveled to Cheboygan solely for the purpose of determining if the Cheboygan neighbors had seen Carol Jean. Nordin noted that he believed the same objective could have been accomplished through use of the telephone. Chief Nordin also noted that the defendant's statement that he did not transact any business within the City of Cheboygan, and that he did not go anywhere in the City of Cheboygan Michigan was later contradicted by the defendant stating, later in the interview, that he went to his bank and went to his safe deposit box for the purpose of

determining whether or not his wife had signed the safe deposit logbook since her disappearance.

The defendant also denied ever committing an act of violence towards Carol Jean Pierce during the entire time that they were married. This is contradicted by the observations of Sandra Bagge, Mary Carne, and Mary Ann Metsker-LaViolette.

Chief Nordin also noted that earlier in the interview the defendant stated that Carol Jean did not give him any prior warning that she would be leaving; however, later in the interview the defendant stated that during the summer prior to her disappearance, Carol Jean intentionally signed off the titles to their pick-up truck and their mobile home. Both the truck and the mobile home were registered in Michigan at that time. When asked why she would relinquish her rights to those properties, the defendant stated Carol Jean told him that she signed off on the titles because she planned on leaving him. The defendant stated he had no idea she was going to sign off on the titles until he came home from work one day and she had already done so. The defendant stated he did not question or challenge her concerning her signing off on the titles.

Additionally, on two or three occasions during the course of the interview, Nordin referred to Carol Jean Pierce as being dead. On each of those occasions the defendant immediately rebutted that reference by saying that he didn't think she was dead. Later in the interview Nordin asked Pierce the following question, "Would she have died within a year of Carol Jean's death?" (referring to the death of another military person) and Pierce responded by saying, "I don't know." Pierce said nothing to rebut the reference to Carol Jean being dead for approximately 30 seconds, at which time he stated, "I don't think that's true."

### **Third Version, Provided to Rene C. Zimmer at Reunion**

During his May 6, 2005 conversation with Lt. Baudhuin, Mr. Rene Zimmer stated that sometime after Carol Jean disappeared he received a call from Brian Fillion to see if either he or his wife had seen Carol Jean. Mr. Zimmer stated this was the first time he had heard of Carol Jean's disappearance. Mr. Zimmer stated that he later came into contact with the defendant at a Coast Guard reunion. Zimmer stated that at this reunion the defendant told him that Carol Jean had left and took all of her belongings while the ship was on the Milwaukee-Chicago run.

### **Fourth Version, Provided to Rose Marlene-Box**

On May 26, 2005 Lt. Baudhuin made contact with Gwenn Ann Schutte. Mrs. Schutte is the biological daughter of Rose Marlene Box-Pierce, the defendant's third wife, who has since passed on. Mrs. Schutte stated that she and her mother occasionally spoke about the disappearance of Carol Jean and that her mother had informed her that the defendant had stated that Carol Jean had taken off with a boyfriend she had in Sturgeon Bay.



**Fifth Version, Provided to Gail L. Box**

On May 26, 2005 Lt. Baudhuin made contact with Gail L. Box, another biological daughter of the defendant's third wife. Gail stated that she and the defendant have discussed Carol Jean in the past and the defendant informed Gail that their marriage was on the rocks and that she simply left him.

On July 9, 2010 Lt. Baudhuin again spoke to Gail Box. Gail stated that she recalled an instance where she was at the defendant's home near the time her mother moved in. During this incident Gail stated she was by the garage with her mother and that the defendant was cleaning some of Carol Jean's personal items out of his garage. Gail stated that while this was occurring she overheard her mother ask "What if Carol comes back... Is she violent or anything?" To which the defendant responded "she's not coming back, don't worry about it, you have nothing to worry about."

Gail went on to state that the items the defendant pulled out included clothing items belonging to Carol Jean, which included bras, slips, and panties.

**Sixth Version, Provided to Chad Box**

On May 27, 2005 Lt. Baudhuin made contact with Chad Box. Chad is the grandson of Rose Box-Pierce. Chad stated he has known the defendant his entire life and stated he considers him to be his grandfather. Chad stated that he lived with the defendant and his grandmother for approximately 6 months, from mid-2001 until the end of 2001.

Chad stated that there was an instance during the time he lived there when he and the defendant were moving some furniture around in the sunroom. Chad stated that his grandmother, Rose, had given instructions to the defendant as to where she wanted the furniture placed. Chad stated that the defendant did not agree with this and made the comment to Chad, "That's why I got rid of my wife." Chad stated that he felt this comment was very odd since he had just learned about Carol Jean's disappearance.

**Seventh Version, Provided to Elaine Reinhardt**

On November 13, 2008 Lt. Baudhuin made contact with Elaine Reinhardt. Reinhardt stated that she spoke to the defendant shortly after the defendant moved back to Cordwood Point and inquired about the status of the defendant's wife. In response, the defendant stated "we divorced." Mrs. Reinhardt stated she did not address the issue with the defendant again.

**Eighth Version, Provided to Alice Maw Wiltse**

On August 24, 2009, Lt. Baudhuin made contact with an Alice Mae Wiltse. Ms. Wiltse stated that she had been dating the defendant for several years and told an investigator that she wanted to discuss the Carol Jean Pierce case.

Wiltse stated that sometime around the summer of 2008 she was at the defendant's home when a neighbor came over to tell him the police were in the area and were looking for him. Ms. Wiltse stated that after the neighbor left she asked Richard why the police would be looking for him. Ms. Wiltse stated that the defendant then became agitated and upset and stated that he was tired of answering questions posed by the police.

Ms. Wiltse stated that when she pressed the defendant, he stated that Carol Jean left him when they were living in Sturgeon Bay, Wisconsin. The defendant went on to state that he went to work that day in Sturgeon Bay and that Carol Jean had an appointment with her psychiatrist that same day. The defendant stated that when he returned home that afternoon Carol Jean was gone and he had not seen or heard from her since.

Ms. Wiltse stated that the defendant would become withdrawn when he learned that officers of the Sturgeon Bay Police Department were in the Cheboygan area. Ms. Wiltse has also stated that the defendant had told her that he believed that his home phone lines, as well as her home phone lines were both tapped by the police and that the defendant only spoke in general terms when speaking on the phone.

Ms. Wiltse stated that the defendant had no close friends that she knew of and that he was not very close with his brothers. Ms. Wiltse stated that the defendant liked to visit casinos, but socialized very little other than that.

---

### **Actions Taken by Richard Pierce after the Disappearance of Carol Jean**

According to Lt. Baudhuin, the defendant engaged in the following notable activities since the disappearance of Carol Jean:

On December 11, 1975 the defendant obtained a loan from the Cheboygan Community Federal Credit Union to purchase a trencher-bulldozer and trailer. The amount of the loan was \$5,120. The defendant's home at 8856 Raspberry Lane sits on approximately 0.55 acres. Lt. Baudhuin checked with neighboring counties and was unable to locate any other land currently or previously owned by the defendant.

On January 25, 1977 the defendant closed the joint bank account he and Carol Jean shared. On June 23, 1977 the Chevrolet truck title was transferred to the sole name of Richard Gale Pierce.

### **Divorce from Carol Jean**

The defendant's divorce from Carol Jean was finalized on November 22, 1977. The defendant was ordered to pay Carol Jean one dollar (\$1.00). The defendant was awarded ownership of the Cordwood Point property. Carol Jean, was ordered to execute a Quit Claim Deed releasing all of her interest in said lands to the defendant.

The divorce order contained an insurance provision which transferred Carol Jean's rights to any life insurance, endowment or annuity upon the life of Richard Gale Pierce, the defendant, to become payable to the defendant or any beneficiary he chooses to designate.

In a 1980 letter to Pauline Fillion, Attorney Richard A. Shulaw concluded that this insurance provision was unusual as it was silent with regard to any interest in the life of Carol Jean. Attorney Shulaw concluded that this was intentional in nature and wrote, "The law in Michigan recites that upon a Judgment of Divorce being granted the same shall terminate any interest any party may have in the life insurance of the other party."

After sending the letter, Attorney Shulaw received a letter from State Farm Insurance indicating that the defendant canceled the State Farm Cheboygan Life Insurance Policy on Carol Jean as of July 17, 1977. The policy was never collected on and was never paid.

### **Michigan Missing Person's Report**

On November, 29, 1975, the defendant filed a missing person's report on Carol Jean, 82 days after the defendant said he last saw her. Within the missing person's report, the defendant noted that Carol Jean had gone missing before, but came home after 2 days. The defendant also noted that Carol Jean was disturbed over moving from Sturgeon Bay to Cheboygan, and that she had been seen at a mental hospital in Green Bay through 1974.

On October 6, 1987, Pauline Fillion appeared before a Grand Jury in Sturgeon Bay, Door County, Wisconsin and gave testimony regarding her knowledge of Carol Jean's history. During this hearing she was asked if she knew of Carol Jean having any history of mental instability, or if she had ever been committed to a mental institution, to which Mrs. Fillion replied she did not.

Mrs. Fillion was also asked if she was ever aware of Carol Jean running away from the defendant or any of her previous husbands in the past, to which she said she was not.

### **Benefits to Pierce after the Death of Carol Jean**

On September 21, 2018 a review of this case was held by the Wisconsin Cold Case Review Team of the Wisconsin Association of Homicide Investigators. That team consisted of Chris Heil, Green Bay Correctional Institution; John Hanrahan, Racine County Sheriff's Department; Tony O'Neill, Marinette County Sheriff's Department (ret); Marianne Flynn-Statz, Madison Police Department; Bob Quant, Oshkosh Police Department (ret) and Steve Daniels, Chairperson of the team.

Upon review of this case the team concluded that the defendant gained numerous things based on Carol Jean's disappearance, which included a pension unencumbered by a wife; most of the important belongings of their marriage; land and a home in Michigan; a new girlfriend weeks after Carol Jean's disappearance, as well as the benefit of Carol Jean's silence.

Based on the foregoing, the complainant believes this complaint to be true and correct.

Subscribed and sworn to before me on 10/10/18  
Electronically Signed By: Nicholas P Grode  
Assistant District Attorney  
State Bar #: 1088007

Electronically Signed By: Sergeant Chad Hougaard  
Complainant

---