

IN THE IOWA DISTRICT COURT FOR HARRISON COUNTY

STATE OF IOWA,

Plaintiff,

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Criminal No. FECR010756

v.

**COMPLAINT AND AFFIDAVIT
FOUR COUNTS**

ANDREW SCHLICHTEMEIER,

Defendant.

2010 SEP 24 AM 10:00
CLERK OF DISTRICT COURT
HARRISON COUNTY IOWA

FILED

COUNT I

The defendant is accused of the crime of **HOMICIDE BY VEHICLE, a class B felony** in violation of Iowa Code Section 707.6A, in that the defendant on or about the 9th day of August, 2010, on interstate 29 near the northbound exit ramp for Little Sioux, Harrison County, Iowa, did cause the death of Dennis Chaney by operating a 2004 Chevrolet pickup truck while under the influence of alcohol or a drug or a combination of such substances or while having an alcohol concentration of .08 or more.

COUNT II

The defendant is accused of the crime of **HOMICIDE BY VEHICLE, a class B felony** in violation of Iowa Code Section 707.6A, in that the defendant on or about the 9th day of August, 2010, on interstate 29 near the northbound exit ramp for Little Sioux, Harrison County, Iowa, did cause the death of Steven Benscoter by operating a 2004 Chevrolet pickup truck while under the influence of alcohol or a drug or a combination of such substances or while having an alcohol concentration of .08 or more.

COUNT III

The defendant is accused of the crime of **HOMICIDE BY VEHICLE, a class B felony** in violation of Iowa Code Section 707.6A, in that the defendant on or about the 9th day of August, 2010, on interstate 29 near the northbound exit ramp for Little Sioux, Harrison County, Iowa, did cause the death of Jay Bock by operating a 2004 Chevrolet pickup truck while under the influence of alcohol or a drug or a combination of such substances or while having an alcohol concentration of .08 or more.

COUNT IV

The defendant is accused of the crime of **HOMICIDE BY VEHICLE, a class B felony** in violation of Iowa Code Section 707.6A, in that the defendant on or about the 9th day of August, 2010, on interstate 29 near the northbound exit ramp for Little Sioux, Harrison County, Iowa, did cause the death of Dale Aspedon by operating a motor vehicle while under the influence of alcohol or a drug or a combination of such substances or while having an alcohol concentration of .08 or more.

THEREFORE, Complainant requests that the Court find that probable cause exists for the aforesaid charges and order the Clerk of the District Court to issue a warrant for the arrest of the defendant for these offenses

L. M. Olesen #486
L. M. Olesen, #486, Iowa State Patrol
Complainant

STATE OF IOWA }
COUNTY OF HARRISON } ss.

I, the undersigned, being duly sworn, state that the following facts known to me or told to me by other reliable persons form the basis for my belief that the defendant committed these crimes: I am a trooper with the Iowa State Patrol and was assigned to investigate a collision that resulted in the death of four men. My investigation revealed that on August 9, 2010, at approximately 5:45 p.m. defendant Andrew Schlichtemeier was operating a 2004 Chevrolet pickup truck, northbound on Interstate 29 at mile marker 95.5 near the northbound exit ramp for Little Sioux, Iowa. This location is within the boundaries of Harrison County, Iowa. Myself and other Iowa State Patrol Troopers have personally interviewed eye witnesses who reported that Schlichtemeier's pickup truck crossed the center line, entered the southbound lane of the Interstate and collided head on with four motorcyclists, subsequently identified as Dennis Chaney, Steven Benscoter, Jay Bock, and Dale Aspedon. All four men died as a result of injuries sustained in this collision. A blood specimen was obtained from the defendant and testing by the Iowa Department of Public Safety Criminalistics Laboratory in Ankeny, IA, established that defendant Schlichtemeier had a blood alcohol concentration of 0.373 g/100m at the time of the collision. Medtox Laboratories analyzed Schlichtemeier's blood specimen for the presence of controlled substances and found that metabolites of THC (marijuana) were present in his blood.

L. M. Olesen #486
L. M. Olesen, #486, Iowa State Patrol
Affiant

Subscribed and sworn to before me by the person signing this Complaint and Affidavit on this 24th day of Sept., 2010.

John Ruedler
Magistrate / Notary Public

I hereby find that the within and foregoing Complaint and Affidavit establish probable cause that the defendant committed the offenses charged.

The Clerk shall X issue an arrest warrant for the defendant with bail set in the amount of \$200,000.00 Cash Only.

John Ruedler
Magistrate