

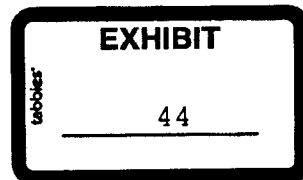
STATE OF WISCONSIN : CIRCUIT COURT : MANITOWOC COUNTY

STATE OF WISCONSIN,)	
)	
Plaintiff,)	
)	Case No. 05-CF-381
v.)	
)	Honorable Judge Angela Sutkiewicz,
STEVEN A. AVERY,)	Judge Presiding
)	
Defendant.)	
)	

AFFIDAVIT OF THOMAS E. PEARCE

Now comes your affiant, Thomas E. Pearce, and under oath hereby states as follows:

1. I am of legal majority and can truthfully and competently testify to the matters contained herein based upon my personal knowledge. The factual statements herein are true and correct to the best of my knowledge, information, and belief. I am of sound mind and have not ingested any alcohol that would impair my memory of the facts stated in this affidavit.
2. I first met Teresa Halbach when she was in her senior year at University of Wisconsin at Green Bay. She interned at my photo studio to fulfill degree requirements. After graduating, Ms. Halbach began working for me. After a period of time, we agreed that Ms. Halbach should start her own business that would operate out of my studio, located at 1599 Western Avenue, Green Bay, Wisconsin.
3. Ms. Halbach and I became good friends during our time working together.
4. Whenever Ms. Halbach knew she would be gone for an extended period of time, she would tell me. I remember that she told me that she would see me at the studio on

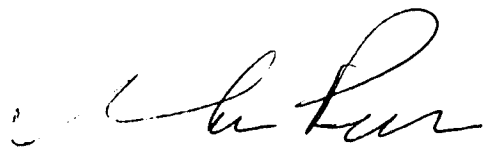


Tuesday, November 1, 2005. The studio was not open on Mondays, so I would not have expected to see her or have any contact with her on October 31, 2005. When she did not arrive at the studio on November 1, I was concerned. However, I knew that she had no photo appointments scheduled for November 1, so I figured she was at home or working for AutoTrader.

5. When Ms. Halbach did not appear at the studio on Wednesday, November 2, 2005, I became very concerned. I knew Ms. Halbach had planned on attending a business marketing meeting on Wednesday morning and coming to work afterward, sometime around 11:00 a.m. When she did not appear by 12:00 p.m., I called her cell phone. When I called her cell phone, I received an automated message that told me that Ms. Halbach's voicemail box was full and that I could not leave a voice message. This automated message was not Ms. Halbach's typical voicemail greeting.
6. I had previously observed Ms. Halbach check her voicemail frequently numerous times throughout the day. Under normal circumstances, I would not expect her to let her voicemail box fill to capacity.
7. When Ms. Halbach did not arrive at the studio on Thursday, November 3, I decided to call her mother, Karen Halbach, to ask after Ms. Halbach's whereabouts. Karen Halbach informed me that she had not seen Ms. Halbach since Sunday, October 30, and that she would begin calling Ms. Halbach's friends to find out if any of them knew where Ms. Halbach was.
8. I was aware that Ms. Halbach was getting phone calls from someone who was harassing her.

9. In March 2005, Ms. Halbach told me that a male AutoTrader client made sexual advances toward her and invited her into his residence. Teresa told me that this advance made her feel uncomfortable. After this incident, Ms. Halbach did not mention any problems with AutoTrader clients. Specifically, Ms. Halbach never expressed concern about going to the Avery property.
10. Ms. Halbach told me on October 29 that she intended to go out to a party on Halloween. I know that most of the time when Ms. Halbach went out to a party, she went to Green Bay or Appleton.
11. Ms. Halbach informed me, when she was working for me as an intern, that she had been in a verbally and physically abusive romantic relationship when she was in college with a male. It is my understanding that she terminated that relationship.
12. I have reviewed Ms. Halbach's online business listing (attached and incorporate herein as Exhibit A to the Affidavit of Thomas E. Pearce). Based upon my personal knowledge of Ms. Halbach's business, Exhibit A is an accurate depiction of the services offered by Ms. Halbach in the regular course of her business.
13. I gave my permission to Ms. Halbach, on a number of occasions, to use my photography studio for nude portraits of her clients. In fact, a portion of my own business was taking nude photographs of my clients.
14. Nothing has been promised to me in exchange for this affidavit.

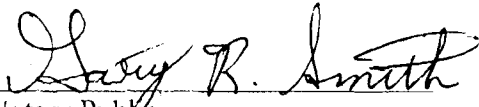
FURTHER AFFIANT SAYETH NAUGHT



Thomas E. Pearce



Subscribed and sworn before me
this 21st day of April, 2017.


Notary Public

My commission expires:
2/24/2020