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STATE OF WISCONSIN SUPREME COURT

Case No. 2023AP847-CRNM

CHANDLER M. HALDERSON, Petitioner,

v.

STATE OF WISCONSIN, Respondent.

No. 2021CF1568

Judge John D. Hyland

PETITON FOR REVIEW

Chandler M. Halderson DOC: 708271

Dodge Correctional Institution

P.O. Box 700

Waupun, WI 53963

SUPREME COURT OF WISCONSIN PETITON FOR REVIEW

CHANDLER M. HALDERSON, Petitioner,

v.

STATE OF WISCONSIN, Respondent.

No. 2021CF1568

Chandler M. Halderson, Petitioner, hereby petitions the Supreme Court of the State of Wisconsin, pursuant to Wis. Stat § 808.10 and Wis. Stat. § (Rule) 809.62 to review the decision of the Court of Appeals, District 4, in State of Wisconsin v. Chandler M. Halderson, appeal no. No. 2023AP847-CRNM, Filed on November 26, 2025

ISSUES PRESENTED FOR REVIEW

1. **SUFFICIENCY OF EVIDENCE**: whether the evidence presented at trial was sufficient to support a conviction for first-degree intentional homicide beyond a reasonable doubt, where the state relied heavily on circumstantial evidence and failed to produce direct evidence of the actus reus of the homicide itself.
2. **Relevance and admissibility of "other acts" evidence**: whether the circuit court erred in admitting extensive "other acts" evidence regarding petitioner's employment, education and personal history (the "web of lies"), where the probative value of such evidence was substantially outweighed by the danger of unfair prejudice, serving primarily to attack petitioner's character rather than to prove motive or intent, in violation of Wis. Stat. § 904.04(2).
3. **Ineffective assistance of council**: whether petitioner was denied the effective assistance of counsel guaranteed by the sixth amendment and article I, section 7 of the Wisconsin constitution, due to trial counsel's failure to: (a) effectively object to prejudicial "other acts" evidence; (b) move for change of venue despite pervasive pretrial publicity; and (c) present a viable defense or expert testimony to counter the State's forensic evidence.
4. **Jury Bias and Pretrial Publicity**: Whether Petitioner's right to an impartial jury was violated by the denial of a change of venue, given the sensationalized media coverage and "live-streamed" scrutiny of proceedings which saturated the potential juror pool in Dane County, creating an atmosphere where a fair trial was impossible.
5. **Sentencing Discretion and Youth**: whether the sentence of life Imprisonment without the possibility of release (Extended Supervision) is unduly harsh and excessive for a defendant who was 23 years old at the time of the offense, failing to adequately account for "emerging adult" mitigating factors and the capacity for rehabilitation.

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STATEMENT OF CRITERIA FOR REVIEW

Review is warranted under Wis. Stat. § 809.62(1r) because:

- **Realignment of substantive law**: this case presents a significant opportunity to clarify the limits of "other acts" evidence in homicide trials. The admission of voluminous evidence regarding non-criminal lies to family members blurred the line between "motive" and prohibited character evidence, creating risk that juries will convict based on "bad-character' rather than proof of the crime charged.
- **Important Question of Law**: The issue of sentencing "emerging adults" (ages 18-25) to life without parole is a developing area of law. This court should settle whether sentencing courts must give greater weight to the neurological immaturity of young adults, distinct from older adult offenders, when exercising discretion to deny eligibility for extended supervision.
- **Need for supervision of lower courts**: the decision below summarily affirmed a conviction despite substantial claims of ineffective assistance and jury bias, departing from the usual course of judicial proceedings which require a robust analysis of constitutional deprivation claims.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

- **U.S. Const. amend. VI**: "in all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury... and to have the assistance of counsel for his defense."
- **Wis. Stat. § 904.03**: "Although relevant, evidence may be excluded if its probative value is substantially outweighed by the danger of unfair prejudice..."
- **Wis. Stat. § 904.04(2)**: evidence of other crimes, wrongs or acts is not admissible to prove the character of a person in order to show that the person acted in conformity therewith.

STATEMENT OF THE CASE

A. **Factual Background** Petitioner Chandler Halderson was charged with First-degree Intentional Homicide, mutilating a corpse, hiding a corpse and providing false information regarding the death of his parents. The State's theory at trial relied heavily on a narrative that petitioner fabricated a "web of lies" concerning a job at SpaceX, his education at Madison College and his volunteer work. The state argued that the discovery of these lies provided a motive for the crimes.
At trial, the State introduced extensive evidence not of the crime itself, but of these fabrications. While physical evidence was found at various locations, no direct evidence or eyewitness testimony established the moment of death or the specific intent required for First-degree intentional Homicide at the time the act allegedly occurred.

B. **Procedural History** Following a jury trial in Dane County Circuit Court, petitioner was convicted on all counts. The trial court imposed a mandatory life sentence and exercised its discretion to deny any eligibility for extended supervision (parole), effectively sentencing petitioner to die in prison.
Petitioner appealed to the Wisconsin Court of Appeals. The appellate Counsel filed a no-merit report. The court of appeals summarily affirmed the conviction, finding no arguable merit to challenges regarding the sufficiency of evidence, the admission of "other acts" evidence, or the severity of sentence. Petitioner now seeks review of that decision.

Argument

I. **The Evidence Was Insufficient to Prove Intentional Homicide Beyond a Reasonable Doubt**
The state's case relied primarily on circumstantial evidence related to the *disposal* of remains, rather than the *commission* of homicide. While the state presented forensic evidence, it failed to bridge the gap between "presence at the scene" or "involvement in disposal" and the specific intent to kill required for First-Degree intentional Homicide. A reasonable jury, properly instructed and stripped of the prejudicial character evidence, could not have found intent beyond a reasonable doubt. The conviction rests on speculation derived from the petitioner's alleged cover-up, which is distinct from the act of murder itself.

II. **The Admission of Extensive "Other Acts" Evidence Was Unduly Prejudicial and Irrelevant**
The trial court allowed the state to parade hours of testimony and evidence regarding Petitioner's fabricated job at SpaceX, school transcripts and insurance emails. Under Wis. Stat. § 904.04(2), this constitutes "other acts" evidence. While the State argued this showed motive, the sheer volume of the evidence transformed the trial into a character assassination. The jury was invited to convict petitioner because he was a "liar," not because he was proven to be a murderer. The probative value of this evidence was substantially outweighed by the danger of unfair prejudice (Wis. Stat. § 904.03). the court of appeals erred in finding this evidence admissible, as it distracted the jury from the central question of guilt regarding the homicide charges.

III. **Petitioner Received Ineffective Assistance of Counsel**
Trial counsel's performance fell below an objective standard of reasonableness under *Strickland v. Washington*:

1. **Failure to object:** counsel failed to aggressively object to the cumulative nature of the "web of lies" evidence, allowing the state to flood the record with bad character evidence.

2. **Venue:** counsel failed to move for a change of venue despite high-profile media coverage in Dane County, including live-streaming of the trial, which tainted the jury pool.
3. **Failure to consult experts:** counsel did not present independent forensic experts to challenge the state's timeline or cause of death, leaving the jury with a one-sided scientific narrative. But for these errors, there is a reasonable if not high probability the outcome of the trial would have been different.

IV. The Jury was Biased by pretrial publicity

The case of State of Wisconsin vs. Chandler Halderson became a media spectacle in Dane county. Potential jurors were exposed to headlines declaring petitioner's guilt long before voir dire. The courts' failure to change venue or conduct a more rigorous individual voir dire regarding specific exposure to media details violated petitioner's sixth amendment right to an impartial jury. The presumption of innocence was eroded by the saturation of negative press.

V. The sentence is unduly harsh and excessive

Petitioner was 23 years old at the time. Modern neuroscience establishes that the human brain, particularly the frontal cortex responsible for impulse control and consequence evaluation, continues to develop until the mid-20s. imposing a life sentence without the possibility of extended supervision on a young adult ignores the capacity for change and rehabilitation. It is a sentence that offers no hope, which Wisconsin courts have recognized as "unduly harsh" when applied to young offenders. The sentencing court failed to give proper weight to petitioner's age as a mitigating factor, treating him with the same severity as a mature, hardened criminal.

APPENDIX

OPINIONS BELOW

The summary disposition of the Court of appeals, District IV, affirming the judgement of conviction was entered in Appeal No. 2023AP847-CRNM.

The Judgement of conviction and sentence of the Dane county circuit court is entered in Case No. 2021CF001568.

JURISDICTION

The decision of the court of appeals was entered on November 26, 2025. This petition is filed within 30 days of that decision pursuant to Wis. Stat. § 808.10 and § 809.62.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

- **U.S. Const. amend. VI**: "in all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury... and to have the assistance of counsel for his defense."
- **Wis. Stat. § 904.03**: "Although relevant, evidence may be excluded if its probative value is substantially outweighed by the danger of unfair prejudice..."
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Conclusion

For the foregoing reasons, Petitioner respectfully requests that this court grant review, reverse the decision of the court of appeals, and remand the case for a new trial or, alternatively, for resentencing.

Respectfully submitted,

CHANDLER M. HALDERSON, *petitioner.*

Dodge Correctional Institution

P.O Box 700,

Waupun WI, 53963

December 16, 2025

CERTIFICATION OF MAILING

I certify that this Petition (10 copies) and Incarcerated Person's Petition for Waiver or Waiver of Prepayment of Fees/Costs (AP-011) was Deposited in the United States mail for delivery to the Clerk of the Supreme Court by mail. I further certify that the Petition and Waiver was correctly addressed and postage was pre-paid.

Date: 12.16.25

Signature: 