

SUPREME COURT OF SUFFOLK COUNTY
STATE OF NEW YORK

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THE PEOPLE OF THE STATE OF NEW YORK,

- against -

REX A. HEUERMANN,

Defendant.
-----X

C.P.L. §530.40
BAIL APPLICATION

Indictment No. 70126-24

(Mazzei, J.)

On or about July 14, 2023, Defendant Rex A. Heuermann was charged by a Grand Jury with the following six counts, which had been incorporated in Suffolk County Indictment # 71889-23:

- MURDER IN THE FIRST DEGREE, in violation of New York State Penal Law Section 125.27(1)(a)(xi), a class A-I violent felony for the death of Melissa Barthelemy on or about July 10, 2009;
- MURDER IN THE FIRST DEGREE, in violation of New York State Penal Law Section 125.27(1)(a)(xi), a class A-I violent felony for the death of Megan Waterman on or about June 6, 2010;
- MURDER IN THE FIRST DEGREE, in violation of New York State Penal Law Section 125.27(1)(a)(xi), a class A-I violent felony for the death of Amber Costello on or about September 2, 2010;
- MURDER IN THE SECOND DEGREE, in violation of New York State Penal Law Section 125.25(1), a class A-I violent felony for the death of Melissa Barthelemy on or about July 10, 2009;

- MURDER IN THE SECOND DEGREE, in violation of New York State Penal Law Section 125.25(1), a class A-I violent felony for the death of Megan Waterman on or about June 6, 2010; and
- MURDER IN THE SECOND DEGREE, in violation of New York State Penal Law Section 125.25(1), a class A-I violent felony for the death of Amber Costello on or about September 2, 2010.

Today, Defendant Rex A. Heuermann stands before this Court charged by the Grand Jury in a Superseding Indictment, which incorporates not only the above counts, but the additional charge of:

- MURDER IN THE SECOND DEGREE, in violation of New York State Penal Law Section 125.25(1), a class A-I violent felony for the death of Maureen Brainard-Barnes on or about July 9, 2007.

The People filed a written bail application at Rex A. Heuermann's initial arraignment, which occurred on July 14, 2023. That application is annexed hereto as *Exhibit A*.

On July 14, 2023, the Hon. Richard Ambro ordered that Defendant Rex A. Heuermann be remanded without bail. The matter was subsequently adjourned to August 1, 2023, before the Hon. Timothy P. Mazzei. On August 1, 2023, and in the ensuing appearances that have followed, this Court has continued to remand the Defendant without bail.

Set forth below is the People's bail application in support of the Superseding Indictment, which will expand on additional evidentiary developments in this investigation not included within *Exhibit A*, further tying Defendant Heuermann to the murders of Melissa Barthelemy, Megan Waterman, Amber Costello, and now, Maureen Brainard-Barnes.

Based on Defendant Heuermann's indictment on an additional murder charge as it pertains to now a fourth victim, the serious nature of these serial murders, the planning and forethought that went into these crimes, the strength of the People's case, the length of incarceration the Defendant faces upon conviction, the extended period of time that this Defendant was able to avoid apprehension, and the remaining facts set forth herein and contained within *Exhibit A*, the People remain steadfast that the only means to ensure Defendant Rex A. Heuermann's return to Court is to remand him without bail.

Records Now Establish that Defendant Heuermann's Wife Was Also Out of New York for the Disappearance of Maureen Brainard-Barnes

As set forth in *Exhibit A*, travel and cellular telephone billing records had previously established that Defendant Heuermann's wife and children were out of the state during the disappearances and murders of three of the four victims, specifically, Melissa Barthelemy, Megan Waterman, and Amber Costello.

Recently, during the execution of numerous search warrants following Defendant Heuermann's arrest, law enforcement secured thousands of documents from storage units leased by Defendant Heuermann. While the review of these records is ongoing, among these records is an August 2007 Bank of America Credit Card statement (see embedded image on following page),¹ which indicates a July 6, 2007 check-in to the Flagship Hotel, located in Atlantic City, as well as transactions which are indicative of a stay in Atlantic City from July 6, 2007 through July 20, 2007.

¹ The highlighted boxes have been added to the bank statement below for demonstration purposes (red indicating a credit card charge for a stay at the Flagship Hotel beginning on July 6, 2007 and blue indicating a credit card charge for a stay at the Club Wyndham Skyline Tower beginning on July 13, 2007). When seized by law enforcement, the document below contained the handwriting depicted in the bank statement below.

Account Information		Billing Cycle and Payment Information	
Summary of Transactions		Summary of Transactions	
Previous Balance	\$53.22	Days in Billing Cycle	29
Payments and Credits	- \$54.00	Closing Date	08/10/07
Cash Advances	+ \$0.00	Payment Due Date	08/30/07
Purchases and Adjustments	+ \$1,448.66	Current Payment Due	\$15.00
Periodic Rate Finance Charges	+ \$0.00	Past Due Amount	+ \$0.00
Transaction Fee Finance Charges	+ \$0.00	Total Minimum Payment Due	\$15.00
New Balance Total	\$1,447.88		

Transactions							
	Posting Date	Transaction Date	Reference Number	Account Number	Category	Amount	
Payments and Credits							
PAYMENT - THANK YOU	07/27					54.00	CR
Purchases and Adjustments							
MARINTERS LANDING WILDWOOD NJ	07/14	07/12	3842	8427	C	100.00	
AMERICAN FASHION ATLANTIC CITYNJ	07/14	07/13	0012	8427	C	16.05	
BOARDWALK FAVORITES ATLANTIC CITYNJ	07/16	07/13	0387	8427	C	18.29	
VICTORIA'S SECRET #135 ATLANTIC CITYNJ	07/16	07/13	5660	8427	C	25.68	
HOT SPOT II ATLANTIC CITYNJ	07/16	07/13	0097	8427	C	22.99	
PLAZA LIQUORS VENTNOR NJ	07/16	07/14	8095	8427	C	15.14	
FLAGSHIP HOTEL ATLANTIC CITYNJ 366890	07/17	07/14	6880	8427	C	37.45	
ARRIVAL DATE 7/06/07							
THE BODY SHOP #583 ATLANTIC CITYNJ	07/17	07/15	7109	8427	C	41.20	
FREEDOM WILDWOOD NJ	07/18	07/16	0050	8427	C	29.99	
OCEAN OASIS NORTH WILDWOODNJ	07/18	07/16	410	8427	C	36.93	
KENNETH COLE #093 ATLANTIC CITYNJ	07/19	07/17	1483	8427	C	42.76	
ADIDAS #178 ATLANTIC CITYNJ	07/19	07/17	4084	8427	C	49.99	
FINISH LINE-#0804 ATLANTIC CITYNJ	07/20	07/18	7754	8427	C	43.96	
BOARDWALK FAVORITES ATLANTIC CITYNJ	07/20	07/18	8931	8427	C	23.27	
ZEYTIANIA ATLANTIC CITYNJ	07/20	07/18	2699	8427	C	35.09	
BARE FEET SHOES -- ATLANTIC CITYNJ	07/21	07/20	0254	8427	C	38.97	
TROPICANA CASINO & RES ATLANTIC CITYNJ	07/23	07/18	1364	8427	C	42.00	
TROPICANA CASINO & RES ATLANTIC CITYNJ 0719000075276	07/23	07/19	1566	8427	C	46.00	
ARRIVAL DATE 7/19/07							
BOARDWALK HALL BOX ATLANTIC CITYNJ	07/23	07/20	9887	8427	C	220.00	
PHIDE201 ACC407							
BOARDWALK HALL BOX ATLANTIC CITYNJ	07/23	07/20	9895	8427	C	330.00	
PHIDE18A ACC407							
SKYLINE TOWER ATLANTIC CITYNJ 0027998407200	07/23	07/20	9594	8427	C	70.00	
ARRIVAL DATE 7/13/07							
CIRCUIT CITY SS #3681 MASSAPEGUA NY	07/28	07/26	5806	8427	C	162.90	

Based on post-arrest interviews with witnesses, including Defendant Heuermann's wife, Ms. Asa Ellerup, the Task Force was able to corroborate that Ms. Ellerup and her two children stayed in Atlantic City, NJ, from on or about July 6, 2007 through on or about July 20, 2007. The trip began with Defendant Heuermann remaining in New York.

According to the investigation to date, Ms. Ellerup and her children checked in to the Flagship Hotel on or about July 6, 2007. On or about July 13, 2007, Defendant Heuermann arrived in Atlantic City. On that date, Defendant Heuermann and his family checked in to the Club Wyndham Skyline Tower in Atlantic City, NJ (as seen above). Consequently, Defendant

Heuermann's wife and children were indeed traveling out of state during the time of Maureen Brainard-Barnes' disappearance, which occurred on or about July 9, 2007.

Based on the foregoing, the murders of all four victims occurred at times when Defendant Heuermann's wife and children were traveling out of state, which allowed Defendant Heuermann unfettered time to execute his plans for each victim without any fear that his family would uncover or learn of his involvement in these crimes.

Additional Burner Phones and Online Account Activity Linked to Defendant Heuermann

As described in *Exhibit A*, over the course of the investigation of Defendant Heuermann, investigators located a number of online accounts and burner cellphones linked to Defendant Heuermann, which were held by Defendant in fictitious names and used for illicit activities.


Two of those phones were recovered from Defendant Heuermann at the time of his arrest, specifically, 347-885-1697, which was recovered from Defendant Heuermann's office in Midtown Manhattan, and 347-304-2671, which was recovered from Defendant Heuermann's person. Both phones have clear ties to Defendant Heuermann (as also set forth within *Exhibit A*), who utilized these phones in furtherance of hundreds of contacts with sex-workers between 2020 and 2023.

For example, an extraction of 347-885-1697, which is an "Alcatel" flip phone recovered from Defendant Heuermann's work desk-drawer, revealed the following communication:

- a. On or about March 1, 2020, starting at approximately 4:39 p.m., the following text message exchange occurred between 347-885-1697 and a (516) phone number (hereinafter "SEX WORKER PHONE # 1"),² which is linked to a sex advertisement in the Massapequa area (see embedded image below);

² The District Attorney's Office is aware of the full 10-digit phone number for SEX WORKER PHONE # 1. The full number is redacted to maintain the privacy of the current possessor of said phone.

26yo MIA!!!All new Big Booty BDSM all fetishes welcomed #Massapequa



+ Tag ad

post ids	247547
first posted	1:13pm Feb 7, 2019 EST
last posted	8:51am Feb 11, 2019 EST
phones	516- [REDACTED]
emails	-
location	New York
url	megapersonals.c... copy

Come experience the best on long island im currently taking appointment in massapequa call for appointment 516 [REDACTED]-Mia

- Hide Details

Profile #1447423
 Seen in 1 location
 2 ads

5 Reposts [Download](#)

- b. At approximately 4:39 p.m., 347-885-1697 sent the following text message to SEX WORKER PHONE # 1, stating, “HI, I SAW YOUR AD AND WANTED TO SEE IF WE COULD SET SOMETHING UP LATER. ANDY”;
- c. At approximately 5:09 p.m., SEX WORKER PHONE # 1 responded to 347-885-1697’s text by stating, “I’M DON’T (sic) FOR THE DAY...DOES TOMORROW WORK?”;
- d. At approximately 5:12 p.m., 347-885-1697 responded by stating, “I AM WORKING ALL DAY. I WAS FREE TODAY MY WIFE IS OUT FOR THE DAY...WORKING MONDAY”;
- e. Soon thereafter, SEX WORKER PHONE # 1 responded to 347-885-1697’s text by stating, “OK LOVE I’M AVAILABLE MONDAY 9AM-2PM, TUESDAY 10-730, THURSDAY 10-730, FRIDAY 1130-730”;
- f. At approximately 5:19 p.m., 347-885-1697 sent the following text message to SEX WORKER PHONE # 1, stating, “THANKS I WILL SEE WHICH DAY I CAN MAKE WORK”;

g. On or about March 4, 2020, at approximately 7:49 p.m., 347-885-1697 sent the following text message to SEX WORKER PHONE # 1, stating, "ANDY HERE EMAIL ME AT SANDBAGGER303@GMAIL.COM WE CAN TALK BED INFO."

Google records obtained via subpoena for the Sandbagger303@gmail.com (hereinafter the "Sandbagger Email Account") revealed that the account was created in 2017 and was subscribed in the fictitious name of "Andrew Roberts," a known alias utilized by Defendant Rex A. ("Andrew") Heuermann. A search warrant revealed that the Sandbagger Email Account was utilized as recently as April 2021, to access and/or conduct searches related to pornography, rape, torture, and sex workers several thousand times. Thereafter in April 2021, Defendant Heuermann is believed to have transitioned such activity to the Thawk Email Account (described in further detail as set forth in *Exhibit A*). For example, these newly discovered searches include, but are not limited to:³

- "tied up fat girl porn"
- "bondage bed"
- "autopsy photos of female"
- "hung by tits porn"
- "ball gag porn"
- "wooden pony porn"
- "chubby teen porn"
- "fat teen cum on face porn"
- "crying blow job porn"
- "skinny white teen crying porn"
- "very skinny white teen tied up porn"
- "ts escorts Manhattan"
- "medieval torture of women"
- "asian escorts manhattan"
- "nyc escorts"
- "escorts manhattan"
- "how I was raped audio"
- "skinny black slave girl porn"
- "stories of rape audio"
- "long island mistress bdsm"
- "young twink tied up porn"
- "escorts nyc bbw"

³ Unless otherwise notated, these searches are listed as they appeared in the Google records.

In addition, Defendant Heuermann used the Sandbagger Email Account, as recently as July 2021, to access and conduct dozens of searches into the Gilgo Beach Homicide investigation. These searches or articles accessed include, but are not limited to:⁴

- “How cell phone tracking is increasingly being used to solve crimes”
- “fbi cellular analysis survey team”
- “Gilgo news”
- “How does cell site analysis work”
- “Historical cell site analysis – overview of principles and survey...”
- “New Discovery Series Tackles Decade Old Long Island Serial Murders”
- “Melissa Barthelemy sister”
- “Inside the mind of a murderer: new clues in the hunt for the Long Island Serial Killer”
- “Long Island Serial Killer victim’s sister reveals more about Maureen Brainard Barnes Mysterious Disappearance”
- “Investigators use DNA, genetic genealogy to ID another victim in Gilgo Beach Serial Murders”

Further Digital Evidence Linked to Defendant Heuermann

Recently, during the execution of numerous search warrants following Defendant Heuermann’s arrest, law enforcement seized hundreds of electronic devices from the Defendant’s home and place of business. While the review of these records is ongoing, the data indicates that Defendant Rex A. Heuermann utilized many of these electronic devices in a similar fashion, e.g.:

- i. Google searches regarding the deceased victims and their family members;
- ii. Google searches regarding the status of the instant investigation;
- iii. Google searches for software that would assist in wiping or erasing data from computers and other similar digital devices;
- iv. Purchase/use of Easy Hide IP, shredder.exe, and other digital masking/forensic wiping tools;

⁴ Unless otherwise noted, these searches or article descriptions are listed as they appeared in the Google records.

- v. Google searches on serial killers and serial killer investigations;
- vi. Defendant's devices also contained the following:
 - i. A collection of violent, bondage, and torture pornography preceding, during, and subsequent to the disappearances and murders of the aforementioned victims between 2007 and 2010; and
 - ii. Prostitution-related searches preceding, during, and subsequent to the disappearances and murders of the aforementioned victims between 2007 and 2010, e.g., Backpage, Craigslist, etc.

Notably, an analysis of Defendant Heuermann's laptop computer indicates the use of a file shredding software on July 9, 2009, shortly before Defendant Heuermann was to meet Melissa Barthelemy. Investigators believe this was an attempt to "shred" any digital evidence of the laptop computer being utilized to search for Melissa Barthelemy's prostitution advertisement.

Moreover, an analysis of Defendant Heuermann's laptop computer reveals that on September 1, 2010, at approximately 9:03 p.m., Defendant Rex A. Heuermann accessed Amber Costello's Backpage ad, just hours before the "ruse" occurred as described within *Exhibit A*. Approximately two hours later, at approximately 11:33 p.m. and 11:34 p.m., a burner phone linked to Defendant Heuermann had communications with Amber Costello's phone. During those communications, the burner cellphone connected to cell site towers in West Amityville and Massapequa Park. Thereafter, the burner cellphone indicates travel to West Babylon, in proximity to the residence of Amber Costello, and again had contact with Ms. Costello's phone at approximately 12:05 a.m. on September 2, 2010, which is when witnesses describe an individual, now known to be the Defendant Rex A. Heuermann, arriving at the Costello residence.

The Task Force’s discovery of a direct link between Rex A. Heuermann and Ms. Costello’s Backpage ad, just hours before Defendant Heuermann met with Ms. Costello, further solidifies that Defendant Heuermann was the “John” who was the subject of the ruse on September 2, 2010, and therefore was the same “John” who returned later that day to pick-up Ms. Costello, prior to her disappearance and murder. Despite Defendant Heuermann’s attempts to “wipe” or “scrub” his laptop computer, he was unsuccessful in concealing his access to Ms. Costello’s Backpage ad.

Recent DNA Analysis of Hairs Recovered from the Examination of the Victims’ Bodies

As set forth in *Exhibit A*, the Suffolk County Crime Laboratory (hereinafter “SCCL”) and two outside forensic laboratories, previously referred to as Forensic Laboratory #1 and Forensic Laboratory # 2, conducted testing of hairs recovered on various victims,⁵ specifically comparing the DNA profiles generated from these hairs recovered at the crime scenes to DNA profiles developed from Defendant Heuermann and members of his immediate family.

On or about July 14, 2023, members of the Task Force met with Defendant Heuermann’s wife, Asa Ellerup, as well as his daughter, Victoria Heuermann, and stepson, Christopher Sheridan and obtained buccal swabs on consent from each of the three individuals. The Task Force transported these swabs to the SCCL and requested that said items be tested against the DNA profiles developed from eleven bottles, previously collected from garbage cans placed in in front of Defendant Heuermann’s residence on July 21, 2022,⁶ as well as a twelfth item, a “Monster Java” can, described *infra*.

⁵ Three of the four victims were restrained by burlap and tape (Melissa Barthelemy, Megan Waterman, and Amber Costello), while the fourth victim (Maureen Brainard-Barnes) was restrained by three belts. The pertinent hairs were recovered from the restraints of three of the four victims, as set forth in *Exhibit A*.

⁶ The SCCL swabbed the “mouth” of said bottles and, of the eleven bottles collected outside the Heuermann residence, the SCCL was able to develop three autosomal DNA profiles, ultimately labeled “Unknown Individual A (a male later determined to be the step-son of Rex A.

a. *“Monster Java” Can Recovered From Victoria Heuermann*

On May 25, 2023, undercover agents of the Task Force conducted physical surveillance of Victoria Heuermann, the then 26-year-old daughter of Defendant Heuermann. During said surveillance, said agent(s) observed Victoria Heuermann board a Long Island Railroad train (hereinafter “LIRR”) at Penn Station, which was headed eastbound towards Massapequa Park. The undercover agent(s) then boarded the train and observed Victoria Heuermann drinking from a gold-colored “Monster Java” can (see embedded and redacted image below).



Heuermann),” “Unknown Individual B (a female later determined to be Asa Ellerup, the wife of Rex A. Heuermann),” and “Unknown Individual C (a male later determined to be Rex A. Heuermann).”

Once the LIRR train arrived at the Massapequa Park station, undercover law enforcement observed Victoria Heuermann exit the train, discard the can into a trash bin, and walk away from the station. The undercover agent(s) of the Task Force then secured the gold-colored “Monster Java” can from the trash receptacle (depicted below) and the can was then subsequently transported to the SCCL for further analysis.



b. SCCL Analysis of Aforementioned Items Following Defendant Heuermann's Arrest

Subsequent to Defendant Rex A. Heuermann's arrest, the SCCL has been able to, *inter alia*, come to the following conclusions:

1. A female DNA profile was developed from the buccal swab of Victoria Heuermann, which matched the DNA profile obtained from the “Monster Java” can;
2. A female DNA profile was developed from the buccal swab of Asa Ellerup, which matched the DNA profiles obtained from two of the eleven bottle cans recovered from

in front of the Heuermann residence on July 21, 2022, which had previously been attributed to “Unknown Individual B.”

DNA samples of the “Monster Java” can and the buccal swabs from Victoria Heuermann and Asa Ellerup were sent to Forensic Laboratory # 1 and Forensic Laboratory # 2 for DNA profiling and further comparison.

c. Determinations made by Forensic Laboratory # 1 Following Defendant Heuermann’s Arrest

Forensic Laboratory # 1 was founded by paleogeneticists to apply DNA techniques and direct genome sequencing used in molecular paleontology to difficult-to-solve forensic casework and the identification of human remains. Forensic Laboratory # 1’s proprietary methods make it possible to recover genetic profiles from rootless hair and other highly degraded samples that otherwise fail traditional forensic DNA testing, including the aforementioned DNA analysis performed at the SCCL.

Recently, Forensic Laboratory # 1 issued reports, which contain the following conclusions:

i. Female Hair on Maureen Brainard-Barnes

Ms. Brainard-Barnes had been left restrained by three leather belts, one of which was utilized to tie Barnes’ feet/ankle/legs together. During the examination of the belts, the SCCL recovered a human hair from the buckle of said belt (hereinafter “Female Hair on Barnes”). On or about December 18, 2010, the SCCL was able to determine that it corresponded to a “Caucasian head hair fragment.” Although this hair was found unsuitable for nuclear DNA profiling at that time, it was subsequently sent to Forensic Laboratory # 1 for further DNA analysis prior to the identification of Rex Heuermann as a suspect.

Recently, Forensic Laboratory # 1 was also able to generate DNA sequencing data for the “Female Hair on Barnes.” Forensic Laboratory # 1 was then able to conduct a one-to-one

autosomal nuclear DNA comparison between said profile (developed from the Female Hair on Barnes) to Asa Ellerup’s SNP Genotype File, which resulted in the following conclusion:

The DNA profile generated from the Female Hair on Barnes, which was recovered from a belt buckle utilized to restrain Ms. Brainard-Barnes’ remains, is 7.9 trillion times more likely to have come from a person genetically identical to Asa Ellerup’s SNP Genotype File than from an unrelated individual (see embedded excerpt of report below):

Items Compared					
External Item ID	Tested Item ID	Inferred Sex	Item Description	Inferred mtDNA Haplogroup	File Type in IBDGem Comparison
Suffolk County Crime Lab; 10-04494; #01.03.03	10-04494_0 1.03.03	Female	Small yellow envelope containing sample. Sealed with evidence tape. Initialed CAW and dated 3/22/20. Additional info on label says: Suffolk County Police Department- 10-65846	K1c2	DNA Sequencing Data
Item 19	Item19	Female	Styrofoam box containing small plastic bag with 1.5 ml tube containing extracts. Styrofoam box top labeled 10-04493 KLA 12/14/22, yellow sticker: Suffolk County Crime Lab 10-04493 #19, suffolk county police department - 10 -658462. Both sides labeled KLA 12/14/22. Small plastic bag front labeled: 10-04493 item 19 = (item 18.8.1 extract) KLA 12/14/22; back labeled: suffolk county crime lab 10-04493 # 19, suffolk county police department - 10-658462. 1.5 ml tube top labeled E22- 155.8, side labeled - 10-04493 18.8.1.	K1c2	SNP Genotype File

A SNP genotype file from a known person of interest was prepared from a DNA Extract labeled with item ID Item19 using DNA sequence data generated by Astrea Forensics. The SNP genotype file was compared to DNA sequence data generated by Astrea Forensics from the unknown Hair sample labeled with item ID 10-04494_01.03.03. For a list of files included in the IBDGem analysis, see Appendix A.

IBDGem Results
 The likelihood of the data from item 10-04494_01.03.03 given that they come from a person genetically identical to the above SNP genotype file is **7927482905432.863711053202581** higher than the likelihood that the data come from an unrelated individual. This statistic is based on the lowest log likelihood ratio (LLR) value observed across 39 chromosome

ii. Two Female Hairs on Megan Waterman

Megan Waterman had been bound by duct tape. During the course of the examination of Ms. Waterman’s body, two female human hairs were recovered, one “from outside the head area” and the other from “the tape of the head area.” Both hairs were recovered in the vicinity of Ms. Waterman’s head (hereinafter “Two Female Hairs on Waterman”). Examination by the SCCL indicated that the Two Female Hairs on Waterman exhibited Caucasian/European characteristics, but were unsuitable for further DNA testing at that time. The Two Female Hairs on Waterman were subsequently

Second, with regards to the hair recovered from “the tape of the head area” of Ms. Waterman, the DNA profile generated from said hair is 2.778×10^{480} more likely to have come from a person genetically identical to Asa Ellerup’s SNP Genotype File than from an unrelated individual.

Items Compared					
External Item ID	Tested Item ID	Inferred Sex	Item Description	Inferred mtDNA Haplogroup	File Type in IBDGem Comparison
Suffolk County Crime Lab: 10-04492; A#02.04.02	10-04492_A_02.04.02	Female	Small yellow envelope containing sample. Sealed with evidence tape. Initialed CAW and dated 3/22/20. Additional info on label says: Suffolk County Police Department- 10-658467.	K1c2	DNA Sequencing Data
Item 19	Item19	Female	Styrofoam box containing small plastic bag with 1.5 ml tube containing extracts. Styrofoam box top labeled 10-04493 KLA 12/14/22, yellow sticker: Suffolk County Crime Lab 10-04493 #19, suffolk county police department - 10 -658462. Both sides labeled KLA 12/14/22. Small plastic bag front labeled: 10-04493 item 19 = (item 18.8.1 extract) KLA 12/14/22; back labeled: suffolk county crime lab 10-04493 # 19, suffolk county police department - 10-658462. 1.5 ml tube top labeled E22- 155.8, side labeled - 10-04493 18.8.1.	K1c2	SNP Genotype File

A SNP genotype file from a known person of interest was prepared from a DNA Extract labeled with item ID Item19 using DNA sequence data generated by Astrea Forensics. The SNP genotype file was compared to DNA sequence data generated by Astrea Forensics from the unknown Hair sample labeled with item ID 10-04492_A_02.04.02. For a list of files included in the IBDGem analysis, see Appendix A.

IBDGem Results

The likelihood of the data from item 10-04492_A_02.04.02 given that they come from a person genetically identical to the above SNP genotype file is **2.778901029818377788751050879E+480** higher than the likelihood that the data come from an unrelated individual. This statistic is based on the lowest log likelihood ratio (LLR) value observed across 39 chromosome

iii. Female Hair on Amber Costello

An examination of the body of Amber Costello revealed that she appeared to have been bound by burlap, as well as numerous pieces of duct tape. During the course of the examination of Ms. Costello’s body, a female human hair was recovered, specifically on a piece of tape from the burlap wrapping, in the vicinity of Ms. Costello’s head (hereinafter “Female Hair on Costello”). A subsequent examination of the Female Hair on Costello led to the determination that it had Caucasian/European characteristics, however, it was unsuitable for further DNA testing at that time by the SCCL. Prior to the identification of Rex Heuermann as a suspect, the Female Hair on

Costello was subsequently submitted to Forensic Laboratory # 1 for further DNA analysis.

Recently, Forensic Laboratory # 1 was able to generate DNA sequencing data for the Female Hair on Costello and subsequently conducted a one-to-one autosomal nuclear DNA comparison between said profile (developed from the Female Hair on Costello) to Victoria Heuermann’s SNP Genotype File (developed from the “Monster Java” can which had been discarded by Victoria Heuermann on May 25, 2023), which resulted in the following conclusion:

The DNA profile generated from the Female Hair on Costello is 4.654×10^{63} more likely to have come from a person genetically identical to Victoria Heuermann’s SNP Genotype File than from an unrelated individual (see embedded excerpt of report below).⁸

Items Compared					
External Item ID	Tested Item ID	Inferred Sex	Item Description	Inferred mtDNA Haplogroup	File Type in IBDGem Comparison
Suffolk County Crime Lab; 10-04493; #08.03.01.0 1	10-04493_0 8.03.01.01	Female	Small yellow envelope containing sample. Sealed with evidence tape. Initialed CAW and dated 3/22/20. Additional info on label says: Suffolk County Police Department- 10-658462	K1c2	DNA Sequencing Data
10-04493 #26	26	Female	Styrofoam box containing 1.5 ml tube of DNA Extract	K1c2	SNP Genotype File

A SNP genotype file from a known person of interest was prepared from a D-DNA Extract labeled with item ID 26 using DNA sequence data generated by Astrea Forensics. The SNP genotype file was compared to DNA sequence data generated by Astrea Forensics from the unknown Hair sample labeled with item ID 10-04493_08.03.01.01. For a list of files included in the IBDGem analysis, see Appendix A.

IBDGem Results

The likelihood of the data from item 10-04493_08.03.01.01 given that they come from a person genetically identical to the above SNP genotype file is **4.654189723820771156258115385E+63** higher than the likelihood that the data come from an unrelated individual. This statistic is based on the lowest log likelihood ratio (LLR) value observed across 39 chromosome arms (Figure 1, red highlight). All other chromosome arms give a higher LLR. For a negative control comparison, see Appendix B.

⁸ Notably, at the time of Ms. Amber Costello’s disappearance and murder, Victoria Heuermann would have been almost one-month shy of her 14th birthday.

Based on the foregoing, it is significant that two forensic laboratories, Forensic Laboratory # 1 and Forensic Laboratory # 2,⁹ have now independently determined that the female hairs recovered on the remains of Ms. Waterman and Ms. Costello, are substantially more likely to have derived from a person genetically identical to the SNP Genotype Files of members of Defendant Heuermann's family, specifically his wife, Asa Ellerup and his daughter, Victoria Heuermann, than from an unrelated individual. Moreover, as set forth herein and in *Exhibit A*, Ms. Ellerup and Victoria Heuermann were out of the state at the time of these murders, which provides further support that Rex A. Heuermann murdered, restrained, and transported the remains of the victims to Gilgo Beach until they were ultimately discovered in December 2010.

Male Hair Linked to Defendant Heuermann

Finally, during the initial examination of Ms. Waterman's skeletal remains and the burlap materials, the SCCL was also able to recover a male hair from the "bottom of the burlap" used to wrap Ms. Waterman by her killer (hereinafter "Male Hair on Waterman"). An initial examination

⁹ In addition to Forensic Laboratory # 1 conducting nuclear DNA testing of the pseudo-exemplars and buccal swab samples from Victoria Heuermann and Asa Ellerup, Forensic Laboratory # 2 conducted mitochondrial DNA testing and was able to generate a full mitochondrial DNA profile from the aforementioned Gatorade bottle, which, as set forth herein, is directly attributable to Asa Ellerup.

Forensic Laboratory #2 compared Asa Ellerup's mitochondrial DNA profile to the mitochondrial DNA profile developed from the Female Hair on Costello, which resulted in the conclusion that the "mitochondrial DNA profile(s) are the same at all compared positions common to and between samples," specifically at a rate that would, as per the EMPOP database, exclude 99.98% of the North American population from the Female Hair on Costello.

Since humans inherit their mitochondrial DNA solely from their mothers, a mother and her children, e.g., Asa Ellerup and Victoria Heuermann, respectively, would share the same mitochondrial DNA profile. Here, Forensic Laboratory # 1's nuclear DNA comparison provides clarity as to who within Asa Ellerup and Victoria Heuermann's mitochondrial profile is the contributor of the Female Hair on Costello.

of said hair revealed Caucasian/European characteristics. However, the hair was unsuitable for further DNA analysis at that time by the SCCL. The Male Hair on Waterman was subsequently submitted to Forensic Laboratory # 1 prior to the identification of Rex Heuermann as a suspect and more recently, to Forensic Laboratory # 2 for further DNA analysis.

a. Determinations made by Forensic Laboratory # 1 Regarding the Male Hair on Waterman Following Defendant Heuermann's Arrest

Recently, Forensic Laboratory # 1 was able to generate DNA sequencing data for the Male Hair on Waterman and subsequently conducted a one-to-one autosomal nuclear DNA comparison between said profiles (developed from the Male Hair on Waterman) to Rex Heuermann's SNP Genotype File (developed from an extract of the napkin contained within the pizza box depicted below and described in further detail in *Exhibit A*), which resulted in the following conclusion:



The DNA profile generated from the Male Hair on Waterman is 1.408×10^{169} more likely to have come from a person genetically identical to Rex Heuermann’s SNP Genotype File than from an unrelated individual.

Items Compared					
External Item ID	Tested Item ID	Inferred Sex	Item Description	Inferred mtDNA Haplogroup	File Type in IBDGem Comparison
Suffolk County Crime Lab; 10-04492; #02.03.01	10-04492_02.03.01	Male	Small yellow envelope containing sample. Sealed with evidence tape. Initialed CAW and dated 3/22/20. Additional info on label says: Suffolk County Police Department- 10-658467.	V7a	DNA Sequencing Data
21	21	Male	50 well styrofoam box containing one 1.5mL tube with liquid.	V7a	SNP Genotype File

A SNP genotype file from a known person of interest was prepared from a D-DNA Extract labeled with item ID 21 using DNA sequence data generated by Astrea Forensics. The SNP genotype file was compared to DNA sequence data generated by Astrea Forensics from the unknown Hair sample labeled with item ID 10-04492_02.03.01. For a list of files included in the IBDGem analysis, see Appendix A.

IBDGem Results

The likelihood of the data from item 10-04492_02.03.01 given that they come from a person genetically identical to the above SNP genotype file is **1.408492580471476356231439482E+169** higher than the likelihood that the data come from an unrelated individual. This statistic is based on the lowest log likelihood ratio (LLR) value observed across 39 chromosome arms (Figure 1, red highlight). All other chromosome arms give a higher LLR. For a negative control comparison, see Appendix B.

b. Determinations made by Forensic Laboratory # 2 Regarding the Male Hair on Waterman Following Defendant Heuermann’s Arrest

Subsequent analysis by Forensic Laboratory # 2 has also forensically tied Defendant Rex A. Heuermann to the contents of the aforementioned pizza box. Specifically, on August 1, 2023, the Suffolk County District Attorney’s Office (hereinafter “SCDAO”) filed an Order to Show Cause, pursuant to CPL 245.40(1)(e), which required Defendant Heuermann to submit to the taking of an oral buccal swab. On August 9, 2023, the Hon. Timothy P. Mazzei granted the SCDAO’s motion. On or about August 16, 2023, SCDAO Detective Investigators secured a buccal swab from Defendant Heuermann at the Suffolk County Correctional Facility.

The SCCL analyzed and subsequently generated a nuclear DNA profile from Defendant Rex A. Heuermann’s buccal swab and sent extracts of said swab to Forensic Laboratory # 2 for

mitochondrial DNA profiling and further comparison.

Recently, Forensic Laboratory # 2 issued a report containing the following conclusions:

- i. The extract of Rex Heuermann's buccal swab was designated as Item # 3402K4;
- ii. Forensic Laboratory # 2 was able to generate a complete mitochondrial DNA profile for Item # 3402K4;
- iii. Forensic Laboratory # 2 compared said profile to the profile previously generated for Item # 3402K2 (from abandoned pizza crust);
- iv. Forensic Laboratory # 2 was able to conclude "[t]he mitochondrial DNA profile of 3402K2 (from the pizza crust) and 3402K4 (Rex Heuermann buccal swab) are the same."

Recently, the SCCL also issued a report containing the following conclusions:

- i. A male nuclear DNA profile was developed from the buccal swab of Rex A. Heuermann, which matched the nuclear DNA profiles previously developed from not only the contents of the pizza box described *supra*, to wit, the pizza crusts and napkin, but also the bottles left out for collection on July 21, 2022 which had previously been attributable to "Unknown Individual C."

Based on the foregoing, it is significant that Forensic Laboratory # 1 and Forensic Laboratory # 2 have been able to determine that the Male Hair on Waterman, namely the male hair recovered near the "bottom of the burlap" utilized to restrain and transport Megan Waterman's naked and deceased body, is substantially more likely to have derived from a person genetically identical to Rex A. Heuermann's SNP Genotype File than from an unrelated individual.

The chart below summarizes the aforementioned results from Forensic Laboratory # 1 and Forensic Laboratory # 2, which have been independently able to determine that hairs recovered on three of the four victims are forensically tied to Defendant Heuermann and to members of his immediate family while that family was out-of-state, lending further support to the conclusion that Defendant Heuermann is the individual who murdered, stripped, restrained, and transported the remains of each of the aforementioned victims to Gilgo Beach until the victims were ultimately discovered in December 2010.

VICTIM	DESIGNATION IN BAIL LETTER	APPROX. LOCATION OF HAIR RECOVERY	MITOCHONDRIAL DNA RESULTS	NUCLEAR (SNP) DNA RESULTS
MAUREEN BRAINARD BARNES	FEMALE HAIR ON BARNES	BUCKLE OF BELT RESTRAINING LOWER BODY	N/A	7.9 Trillion Times More Likely to Come From An Individual with the Identical Genetic Profile as ASA ELLERUP
MEGAN WATERMAN	[FIRST OF] TWO FEMALE HAIRS ON WATERMAN	OUTSIDE HEAD AREA	99.69% of North American population can be excluded but not ASA ELLERUP or VICTORIA HEUERMANN	2.374 x 10 ⁴⁸ Times More Likely to Come From An Individual with the Identical Genetic Profile as ASA ELLERUP
MEGAN WATERMAN	[SECOND OF] TWO FEMALE HAIRS ON WATERMAN	TAPE IN THE AREA OF THE HEAD	N/A	2.778 x 10 ⁴⁸⁰ Times More Likely to Come From An Individual with the Identical Genetic Profile as ASA ELLERUP
MEGAN WATERMAN	MALE HAIR ON WATERMAN	BOTTOM PORTION OF BURLAP	99.96% of North American population can be excluded but not REX HEUERMANN	1.408 x 10 ¹⁶⁹ Times More Likely to Come From An Individual with the Identical Genetic Profile as REX HEUERMANN
AMBER COSTELLO	FEMALE HAIR ON COSTELLO	TAPE IN THE AREA OF THE HEAD	99.98% of North American population can be excluded but not ASA ELLERUP or VICTORIA HEUERMANN	4.654 x 10 ⁶³ Times More Likely to Come From An Individual with the Identical Genetic Profile as VICTORIA HEUERMANN

Penalties

If convicted on the current charges, Defendant Rex A. Heuermann faces multiple sentences of life without parole.

Remand Without Bail is Appropriate

Based on the serious, heinous nature of these serial murders, the strength of the People's case, the life incarceration the defendant faces upon conviction, the extreme measures this defendant took to attempt to avoid apprehension for over a decade, Defendant's use of fictitious names, email and cellphone "burner" accounts to avoid detection, online counter-surveillance, and Defendant's indictment on yet another murder charge as it pertains to now a fourth victim, the People remain steadfast that the only means to ensure the Defendant's return to court is to remand the Defendant without bail.

DATED: January 16, 2024
Suffolk County, New York

RAYMOND A. TIERNEY
DISTRICT ATTORNEY

A handwritten signature in black ink, appearing to be 'AL', written over a horizontal line.

By: Andrew Lee
Assistant District Attorney

EXHIBIT A

COUNTY COURT OF SUFFOLK COUNTY
STATE OF NEW YORK

-----x
THE PEOPLE OF THE STATE OF NEW YORK,

- against -

REX A. HEUERMANN,

Defendant.
-----x

C.P.L. §530.40
BAIL APPLICATION

Indictment No. 71889-23

(Ambro, J.)

Defendant Rex A. Heuermann stands before this court charged by the Grand Jury with:

- MURDER IN THE FIRST DEGREE, in violation of New York State Penal Law Section 125.27(1)(a)(xi), a class A-I violent felony for the death of Melissa Barthelemy on or about July 10, 2009;
- MURDER IN THE FIRST DEGREE, in violation of New York State Penal Law Section 125.27(1)(a)(xi), a class A-I violent felony for the death of Megan Waterman on or about June 6, 2010;
- MURDER IN THE FIRST DEGREE, in violation of New York State Penal Law Section 125.27(1)(a)(xi), a class A-I violent felony for the death of Amber Costello on or about September 2, 2010;
- MURDER IN THE SECOND DEGREE, in violation of New York State Penal Law Section 125.25(1), a class A-I violent felony for the death of Melissa Barthelemy on or about July 10, 2009;
- MURDER IN THE SECOND DEGREE, in violation of New York State Penal Law Section 125.25(1), a class A-I violent felony for the death of Megan Waterman on or about June 6, 2010; and

- MURDER IN THE SECOND DEGREE, in violation of New York State Penal Law Section 125.25(1), a class A-I violent felony for the death of Amber Costello on or about September 2, 2010.

As described below, based on the serious, heinous nature of these serial murders, the planning and forethought that went into these crimes, the strength of the People's case, the length of incarceration the defendant faces upon conviction, the extended period of time that this Defendant was able to avoid apprehension, his recent searches for sadistic materials, child pornography, images of the victims and their relatives, counter-surveillance conducted online as to the criminal investigation, his use of fictitious names, burner email and cellphone accounts, and his access to and history of possessing firearms, the only means to ensure Defendant Rex A. Heuermann's return to court is to remand him without bail.

Discovery of the Victims

On December 11, 2010, Police Officer John Malia was conducting a training exercise with his K9 partner, Blue, along Ocean Parkway in Gilgo Beach, Suffolk County, New York. During the course of the training exercise, Blue located a set of human remains. The remains were later identified to be those of Melissa Barthelemy. Two days later, on December 13, 2010, the SCPD continued to search in proximity to where the remains of Melissa Barthelemy were recovered. On that date, members of the SCPD found three additional sets of human remains within one-quarter mile of the first discovery (see image below). These three additional sets of remains were

identified as those of Maureen Brainard-Barnes,¹ Megan Waterman, and Amber Costello. The cause of death of all four women was determined to be homicidal violence.



The investigations into these deaths were linked as, in addition to other factors, the victims each appeared to have been placed in close proximity to one another, 22 to 33 feet from the edge of the parkway, all were petite females approximately 22 to 27 years old, believed to be working as sex workers, all had missing clothing and personal possessions, all had been killed by homicide, all had contact shortly before their disappearances with a person using a “burner” cellphone (i.e., cellphones without an associated verified identity), and the cellphones of two of the four victims,

¹ Although the defendant is not yet charged with any crimes as to the disappearance and murder of Ms. Brainard-Barnes, as set forth below, Defendant Rex A. Heuermann is the prime suspect in her death and the investigation, which is continuing and is expected to be resolved soon. Moreover, there is substantial evidence of Defendant Heuermann’s involvement in the disappearance and death of Ms. Brainard-Barnes, which evidence closely fits the *modus operandi* of the Defendant in relation to the deaths of the other three women and which supports the current charges. As such, this bail application contains descriptions of that evidence which demonstrates the strength of the People’s case as currently charged.

Brainard-Barnes and Barthelemy, were used by the killer after their deaths. In addition, each of the four victims were found similarly positioned, bound in a similar fashion by either belts or tape, with three of the victims found wrapped in a burlap-type material.

Recent Investigation

In January 2022, the Suffolk County District Attorney's Office assigned an experienced team of investigators, analysts, and prosecutors to work jointly with law enforcement partners from the Suffolk County Police Department, New York State Police, Suffolk County Sheriff's Office and Federal Bureau of Investigation ("FBI"). A comprehensive review of every item of evidence and information in this investigation was undertaken by the team. On March 14, 2022, approximately two months into the renewed joint investigation, this comprehensive review led to the discovery of a first-generation Chevrolet Avalanche that was registered to Defendant Rex A. Heuermann at the time of these murders. As described below, this was significant, because a witness to the disappearance of Amber Costello identified a first-generation Chevrolet Avalanche as the vehicle believed to have been driven by her killer.

This discovery led to a comprehensive investigation of Defendant Heuermann which consisted of over 300 subpoenas, search warrants and other legal processes to obtain evidence. As discussed more fully below, among the items uncovered were cellphone billing records for Defendant Heuermann corresponding to cell site locations for 1) the burner cellphones used to arrange meetings with three of the four victims, 2) the taunting calls made to a relative of Ms. Barthelemy, 3) a call made by a detective to Ms. Barthelemy's cellphone while looking into her disappearance and 4) calls checking voicemail on Ms. Brainard-Barnes' cellphone after her disappearance. In addition, Heuermann lived in Massapequa Park where the victims were believed to have disappeared from, and he worked in Midtown Manhattan, in the vicinity where the taunting

calls were made to the sister of Ms. Barthelemy. As set forth more fully below, Defendant Rex A. Heuermann is believed to be the person who used the burner cellphones to communicate with each of the four victims prior to their disappearance and who used Ms. Brainard-Barnes' cellphone and Ms. Barthelemy's cellphone after their deaths. Both Defendant Heuermann and these burner cellphones had significant connections to both Midtown Manhattan and Massapequa Park, New York.

The Disappearance and Murder of Maureen Brainard-Barnes

Maureen Brainard-Barnes was last seen on July 9, 2007, in New York City. At that time, she was believed to be working as a sex worker. On July 6, 2007, Ms. Brainard-Barnes' cellphone was contacted by a burner cellphone. Between July 6, 2007 and July 9, 2007, there were sixteen interactions between this burner phone and Brainard-Barnes' cellphone. On July 9, 2007, the last cell site location for the Brainard-Barnes cellphone was at approximately 11:56 p.m. in Midtown Manhattan near the 59th Street Bridge. Thereafter, the Brainard-Barnes cellphone had no further activity until July 12, 2007. On July 12, 2007, three days after her disappearance, two outbound calls were made from Brainard-Barnes cellphone, checking her voicemail from a cell site location near the Long Island Expressway in Islandia.

The Disappearance and Murder of Melissa Barthelemy

Melissa Barthelemy was last seen on July 10, 2009, in New York City. At that time, she was believed to be working as a sex worker. On July 3, 2009, Ms. Barthelemy was contacted by a burner cellphone. Thereafter, the Barthelemy Cellphone was contacted by this burner cellphone on July 6, July 9, and July 10, 2009, which was the last day she was seen alive. On July 10, 2009, cell site records indicate the burner cellphone traveled from Massapequa Park to Midtown Manhattan. Later that evening, the Barthelemy Cellphone traveled from Midtown Manhattan to

Massapequa with the last cell site location being in Massapequa on July 11, 2009, at approximately 1:43 a.m. On July 11, 2009, Ms. Barthelemy's cellphone was used to make an outbound call checking her voicemail from a cell site location in Freeport. On July 11 and July 12, 2009, the Barthelemy Phone made two more outbound calls checking her voicemail from cell site locations in Babylon. On July 17, July 23, August 5, August 19, and August 26, 2009, the Barthelemy Phone made taunting phone calls to Ms. Barthelemy's family members, some of which resulted in a conversation between the caller, who was a male, and a relative of Melissa Barthelemy, in which the male caller admitted killing and sexually assaulting Ms. Barthelemy. As described below, the cell site locations of the Barthelemy Phone during these taunting calls were all in Midtown Manhattan.

The Disappearance and Murder of Megan Waterman

Megan Waterman was last seen alive at the Holiday Inn in Hauppauge, New York, on June 6, 2010, at approximately 1:30 a.m. At that time, she was believed to be working as a sex worker. On June 5, 2010, Ms. Waterman's cellphone was contacted by another burner cellphone, which had just been activated that day. Thereafter, the Waterman Phone communicated with this burner cellphone on June 6, 2010, at approximately 1:31 a.m., which is around the time Megan Waterman was captured on video surveillance exiting the Holiday Inn in Hauppauge for the last time. Following that communication, the burner cellphone had no further phone activity. However, cell site records show that the Waterman Phone traveled to Massapequa Park with the last cell site location being in Massapequa Park at approximately 3:11 a.m. in the vicinity of the residence of Defendant Heuermann.

The Disappearance and Murder of Amber Costello

Amber Costello was last seen alive on September 2, 2010, leaving her residence at 1112 America Avenue in West Babylon during the late evening hours. At that time, she was believed to be working as a sex worker. On September 1, 2010, the day prior to the disappearance of Amber Costello, Ms. Costello's cellphone was contacted by a burner cellphone. On September 1, 2010, this burner cellphone had communications with the Costello Phone at approximately 11:33 p.m. and 11:34 p.m. During those communications, the burner cellphone connected to cell site towers in West Amityville and Massapequa Park. Thereafter, the burner cellphone traveled to West Babylon, in proximity to the residence of Amber Costello, and had contact with the Costello Phone at approximately 12:05 a.m. on September 2, 2010.

According to witnesses, around the time of these communications between the burner cellphone and the Costello Phone on September 1-2, 2010, a prostitution client showed up at Ms. Costello's residence located in West Babylon, New York. After the client entered the home, a ruse was executed on the client whereby a person pretended to be the outraged boyfriend of Amber Costello and the client left from the residence, while Amber Costello retained the money the client had brought to pay for her services. Based upon interviews, that client was described as a large, white male, approximately 6'4" to 6'6" in height, in his mid-forties, with "dark bushy hair," and "big oval style 1970's type eyeglasses."² A witness described him to police as appearing like an "ogre." Furthermore, a witness noticed a first-generation Chevrolet Avalanche parked in the driveway of the residence. According to the witness, following the ruse, this client said he was "just her friend," "tell her I'll give her a call," and walked out the front door. Thereafter, at

² This mirrors the physical attributes of Defendant Rex A. Heuermann who is a large, white male, approximately 6'4" in height, in excess of 240 pounds in weight, with dark bushy hair, who wears large eyeglasses and who was 46 years old when Amber Costello went missing.

approximately 1:18 a.m., on September 2, after the ruse had been perpetrated, the burner cellphone sent a text message to the Costello Phone, which stated, “That was not nice so do i [sic] credit for next time.” Phone records show that the burner phone was located in Massapequa Park, within two minutes of this text message being sent.

According to a witness, later the next day on September 2, 2010, Ms. Costello was again contacted by the same client that was in the house the night before with the Avalanche. Further, “Amber told us that he wanted to see her again, but he didn’t want to come back to the house because of her boyfriend.”

Thereafter on September 2, 2010, at approximately 9:32 p.m., the same burner cellphone from the previous evening again communicated with the Costello Phone. During this communication, the burner cellphone used a cell site location in Midtown Manhattan. Following this communication and based upon the cell site records, the burner cellphone traveled to Massapequa Park and had contacts with the Costello Phone at approximately 10:39 p.m. and 11:05 p.m. Cell site records for the burner phone indicate that at approximately 11:17 p.m., the phone traveled to West Babylon in proximity to the residence of Amber Costello. Subsequently, Amber Costello left her own cellphone behind, walked out the front door of the residence, and was seen alive for the last time. Shortly after Ms. Costello left the house, a witness observed a dark-colored truck pass the house, specifically coming from the direction Amber had walked towards.

Records Establish that Defendant Heuermann’s Wife Was Out of New York for the Disappearances of Barthelemy, Waterman and Costello

Significantly, travel records show that on July 8, 2009, Defendant Heuermann’s wife departed the United States for Iceland. On August 18, 2009, Defendant Heuermann’s wife returned to the United States. Consequently, Defendant Heuermann’s wife was out of the country during the time of Melissa Barthelemy’s disappearance.

Based upon cellular telephone billing records, on June 4, 2010, the cellular telephone subscribed to by Defendant Heuermann's wife traveled from New York to Maryland. On June 8, 2010, the cellular telephone subscribed to by Defendant Heuermann's wife returned to New York from Maryland. Consequently, based upon cellular telephone records, the cellular telephone subscribed to by Defendant Heuermann's wife was out of New York State during the time of Megan Waterman's disappearance.

Based upon cellular telephone billing records, on August 28, 2010, the cellular telephone subscribed to by Defendant Heuermann's wife traveled from New York to New Jersey. On September 5, 2010, the cellular telephone subscribed to by his wife returned to New York from New Jersey. Consequently, the cellular telephone subscribed to by Defendant Heuermann's wife was out of New York State during the time of Amber Costello's disappearance.³

Cellular Billing Records for the Cellphone of Rex A. Heuermann

During the times of the disappearances and murders of the victims, Defendant Heuermann owned an architectural business located in Midtown Manhattan and this business was the named subscriber of Heuermann's cellphone, which was active during the times of the victims' disappearances and subscribed to Heuermann's home address in Massapequa Park. Although cell site records from that time period no longer existed, investigators obtained cellular billing records which showed general location information for Heuermann's cellphone. A review of these records, as well as Heuermann's American Express records, showed numerous instances where Heuermann was located in the same general locations as the burner cellphones used to contact victims Barthelemy,

³ Neither cellular telephone billing records, nor travel/financial records, could be obtained for Defendant Heuermann's wife for 2007, as such records were no longer available due to retention policies. Therefore, it is undetermined at this time Defendant Heuermann's wife was traveling out-of-state during the time of Maureen Brainard-Barnes' disappearance and murder.

Waterman, and Costello,⁴ as well as the use of Brainard-Barnes and Barthelemy's cellphones when they were used to check voicemail and make taunting phone calls after the women disappeared. Significantly, investigators could find no instance where Heuermann was in a separate location from these other cellphones when such a communication event occurred.

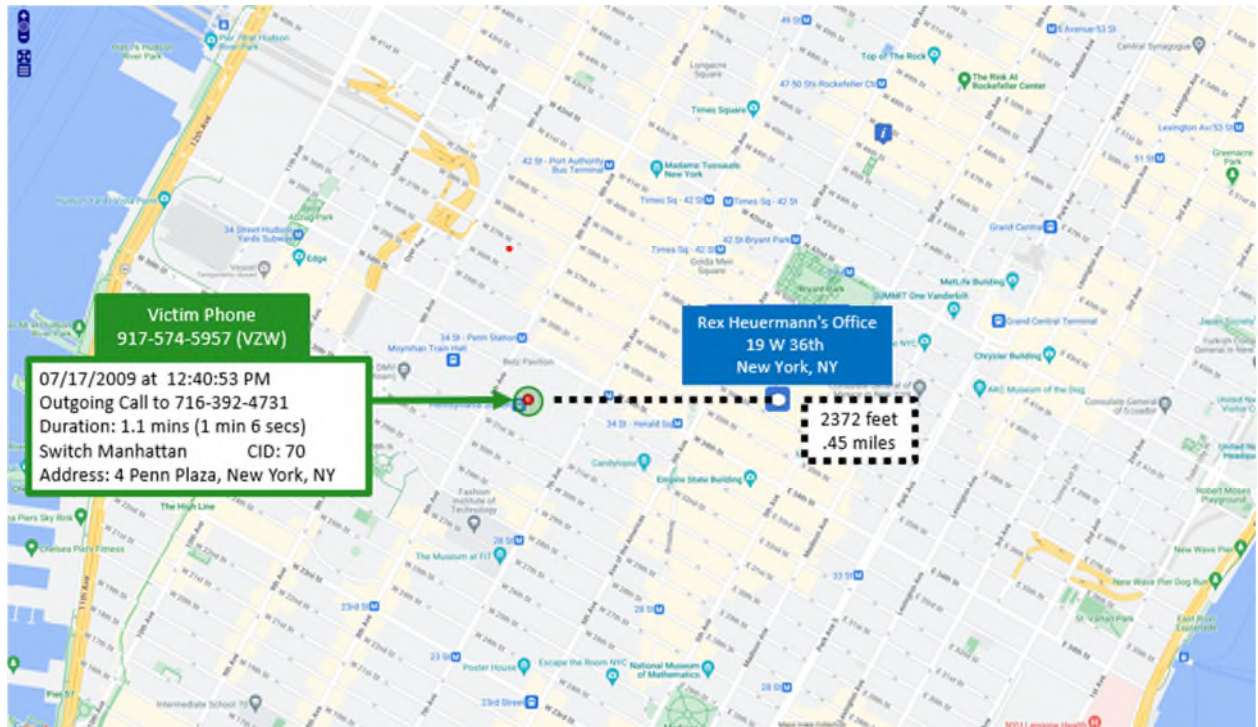
For example, on July 10, 2009, the last day Melissa Barthelemy was seen alive, both the burner phone and Defendant Heuermann's phone were in the area of Massapequa and traveled together toward New York City. Thereafter, both Ms. Barthelemy's phone and Heuermann's phone traveled eastbound toward Massapequa.

On July 14, 2009, at approximately 7:15 p.m., cell site records indicate the burner phone used to contact Ms. Barthelemy prior to her disappearance had activity in Manhattan. On this same date, between approximately 6:58 p.m. and 7:22 p.m., billing records from Heuermann's cellphone also showed call locations in New York City.

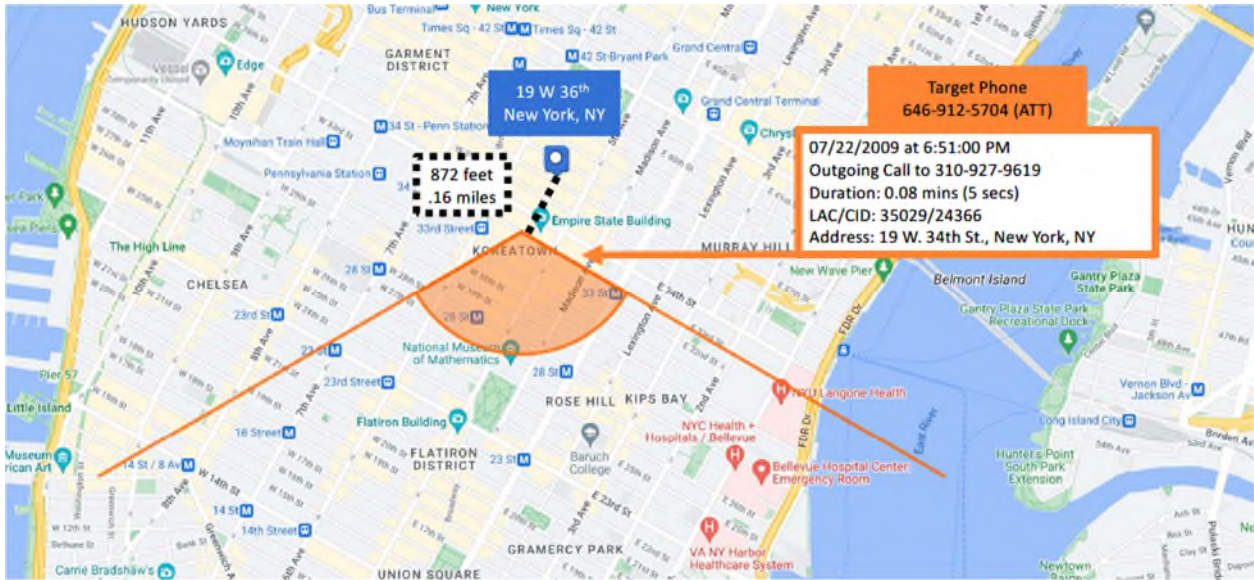
Following Ms. Barthelemy's disappearance, on July 17, 2009, at approximately 12:40 p.m., a male caller used the Barthelemy Phone to contact Ms. Barthelemy's family. The Barthelemy Phone was located in New York City at this time, specifically attached to a cellular tower located at 4 Penn Plaza, which is approximately 2,372 feet or .45 miles from Heuermann's then-office space, which

⁴ Unfortunately, cell site records for the burner cellphone used to contact Ms. Brainard-Barnes were not obtained at the time of her disappearance and no longer exist.

at the time was located at 19 West 36th Street, New York, NY (see illustration below). On this same date, at approximately 1:45 pm., billing records from Heuermann's phone also show a call location in New York City.



On July 22, 2009, at 6:51 p.m., cell site records indicate the burner cellphone had activity in New York City, specifically attached to a cellular tower located at 19 West 34th Street, which is approximately 872 feet or .16 miles from Defendant Heuermann's then-office space, which at the time was located at 19 West 36th Street, New York, NY (see illustration below). On this same date, at approximately 5:12 p.m., billing records from Heuermann's cellphone listed a call located in New York City.



On July 23, 2009, at approximately 1:39 p.m., cell site records indicate that the burner cellphone had activity in New York City, specifically attached to a cellular tower located at 19 West 34th Street, which is approximately 872 feet or .16 miles from Heuermann’s then-office space (see illustration below). On that same date, at approximately 12:48 p.m., billing records from Heuermann’s cellphone listed a call located in New York, NY.



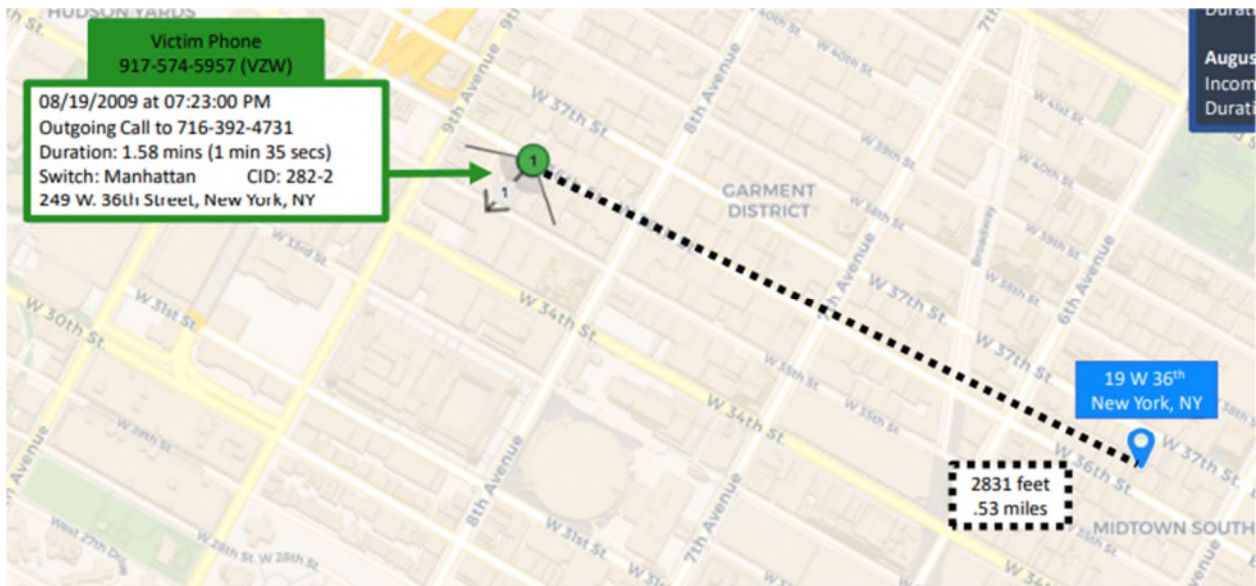
On July 23, 2009, at approximately 6:42 p.m., a male caller used the Barthelemy Phone to contact her family. The Barthelemy Phone was located in New York City at this time, specifically attached to a cellular tower located at 275 West 39th Street, which is approximately 872 feet or .16 miles from Heuermann’s then-office space. On July 23, 2009, between approximately 8:29 p.m. and 9:30 p.m., the burner cellphone had activity in New York City. Later on this same date, at approximately 11:05 p.m., billing records from Heuermann’s cellphone listed a call located in Jamaica, Queens.

On August 5, 2009, between approximately 6:50 p.m. and 7:11 p.m., a male caller used the Barthelemy Phone to contact Ms. Barthelemy’s family. During said time period, the Barthelemy Phone utilized the following cellular phone towers in New York City, which are 2230 to 3280 feet from Heuermann’s then office-space (see illustration below). On this same date, during a similar timeframe, between approximately 6:46 p.m. and 7:05 p.m., Heuermann’s cellphone listed billing locations in New York City.

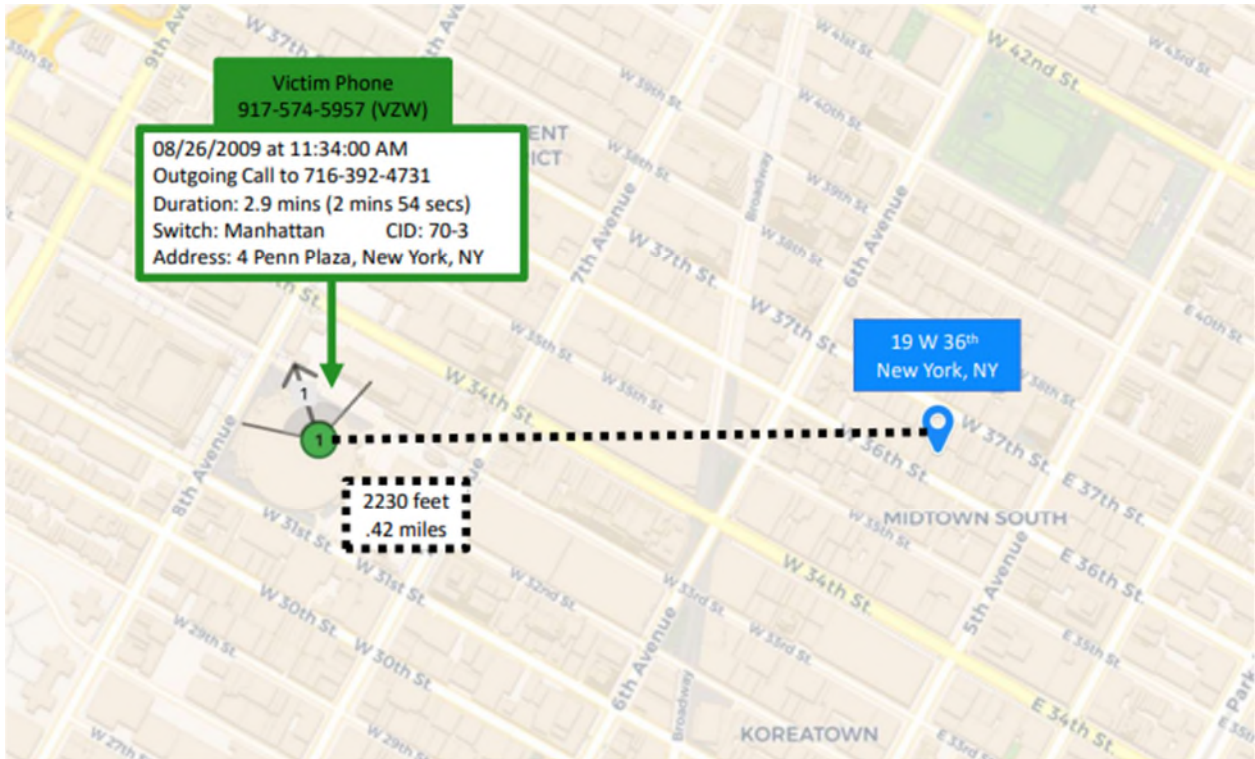


On August 10, 2009, based upon subpoenaed travel documents, Heuermann departed for Iceland and all phone activity for the Barthelemy Phone stopped. On August 18, 2009, Heuermann returned from Iceland and phone activity for the Barthelemy Phone resumed the next day.

On August 19, 2009, at approximately 7:23 p.m., a male caller used the Barthelemy Phone to contact Ms. Barthelemy's family. Cell site records indicate that the Barthelemy Phone was located in New York City at this time, specifically attached to a cellular tower located at 249 West 36th Street, which is approximately 2,831 feet or .53 miles from Heuermann's then-office space (see illustration below). On this same date, before and after the call to Barthelemy's family, at approximately 7:16 p.m. and 7:28 p.m., billing records from Heuermann's cellphone list calls located in New York City.



On August 26, 2009, between approximately 11:29 a.m. and 11:34 a.m., a male caller used the Barthelemy Phone to contact Ms. Barthelemy's family. According to cell site records, the Barthelemy Phone was located in New York City at this time, specifically attached to the cellular tower located at 4 Penn Plaza, which is approximately 2,230 feet or .42 miles from Heuermann's then-office space (see illustration below). On this same date, at approximately 11:38 a.m., billing records for Heuermann's cellphone list a call location in New York City.



Additional Burner Phones and Online Account Activity Linked to Defendant Heuerman

As described herein, over the course of the comprehensive investigation of Defendant Heuermann, investigators located a number of online accounts and burner cellphones linked to Defendant Heuermann, but which were held by him in fictitious names and used for illicit activities.

American Express records obtained via subpoena revealed recurring “Google Pay” payments made by Defendant Heuermann to “Tinder,” an online dating and geosocial networking application used to find “dates” or “hookups” within a user’s immediate vicinity.

Records were then obtained from Tinder, which revealed that the Tinder Profile was set up in the name “Andy” (Heuermann’s middle name is Andrew), with links to a burner cellphone 347-885-1697, subscribed in the fictitious name of “Andrew Roberts,” using an email account, Springfieldman9@aol.com. The Springfieldman9@aol.com account was established with AOL on January 15, 2011, in the fictitious name “John Springfield” with an Astoria, Queens, New York zip code, using another burner cellphone, 347-304-2671, which records show has no named subscriber.

Records obtained from Verizon showed that Defendant Heuermann’s cellphone was used on December 11, 2022, for a period of over three hours to access the fictitious Springfieldman9 AOL Account. Similarly, records obtained from T-Mobile show that burner cellphone 347-304-2671 was used on multiple dates including November 8, 2022, to access this account.

A review of call records for these two additional burner cellphones revealed that both cellphones were used extensively between 2021 and 2023 for prostitution-related contacts (either with sex workers or massage parlors). In addition, cell site warrants for these burner cellphones revealed that just like the burner cellphones Defendant Heuermann used to contact the victims prior to their disappearances, these additional burner cellphones had frequent cell site activity in

Midtown Manhattan and Massapequa Park. Specifically, the records revealed that both these burner cellphones consistently had activity on the cellular towers that provided coverage to Defendant Heuermann's residence in Massapequa Park and his business in New York City.

Legal process served on Google seeking records or accounts associated with the device identifiers of these additional burner cellphones revealed a connection to yet another "burner" or "junk" email account, namely thawk080672@gmail.com (hereinafter the "Thawk Email Account"). Google records further indicated that the Thawk Email Account was subscribed in the fictitious name "Thomas Hawk." A search warrant revealed that the Thawk Email Account, associated with burner cellphone 347-304-2671, was used to conduct thousands of searches related to sex workers, sadistic, torture-related pornography and child pornography, including:

1. mistress long island
2. mature escorts Manhattan
3. girl begging for rape porn
4. teen girl begging for rape porn
5. pretty girl with bruised face porn
6. torture redhead porn
7. 10 year old school girl
8. henta[i] plump pussy lips cut off porn
9. skinny red head tied up porn
10. short fat girl tied up po[r]n
11. tied up and raped porn
12. Asian twink tied up porn
13. tied slave forced cock
14. cum shot and crying porn
15. girl hog tied torture porn
16. 10 year old blonde hair girl
17. Chubby 10 year old girl
18. Black girl 10 years old
19. Girl with face beat up
20. Chubby 10 year old girl crying
21. 13 year old school girl
22. Age 12 child girl with blonde hair and blue eyes
23. Blonde hair girl young depressed
24. Teen girl oiled bodies
25. Preteen girl with makeup
26. Nude slave girls

27. Old Janitors gangbang little school girl
28. Crying girl painful anal
29. School girl
30. Crying teen porn

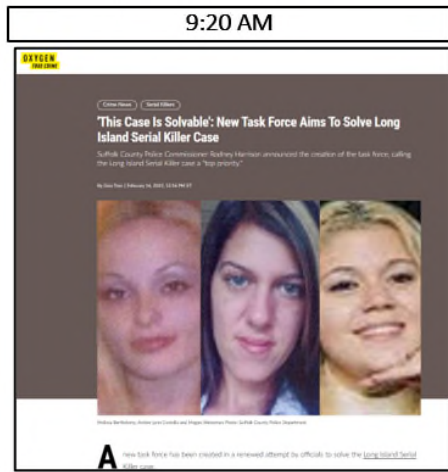
The Thawk Email Account was also used to conduct in excess of two-hundred (200) searches, between March 2022 and June 2023, related to active and known serial killers, the specific disappearances and murders of Maureen Brainard-Barnes, Melissa Barthelemy, Megan Waterman, and Amber Costello, and the investigation into their murders. These searches or articles accessed include, but are not limited to:

1. “why could law enforcement not trace the calls made by the long island serial killer”
2. “why hasn’t the long island serial killer been caught”
3. “Long Island killer”
4. “Long Island Serial Killer Phone Call”
5. “Long Island Serial Killer update”
6. “Long Island Serial Killer Update 2022”
7. “FBI active serial killers”
8. “Serial Killers by State 2023”
9. “Map of all known serial killers”
10. “unsolved serial killer cases”
11. “America’s 5 most notorious old cases”
12. “11 Currently Active Serial Killers”
13. “8 Terrifying Active Serial Killers (We Can’t Find)”
14. “John Bitroff”
15. “Megan Waterman”
16. “Melissa Barthelemy”
17. “Maureen Brainard-Barnes”
18. “[Redacted – name of relative of Melissa] Barthelemy”
19. “[Redacted – name of relative of Megan] Waterman”
20. “Cops launch Gilgo Beach Homicide Investigation Task Force”
21. “Mapping the Long Island Murder Victims”
22. “Inside the Long Island Serial Killer and Gilgo Beach”
23. “The Gilgo Beach Killer | Criminal Minds”
24. “In Long Island serial killer investigation, new phone technology may be key to break in case”

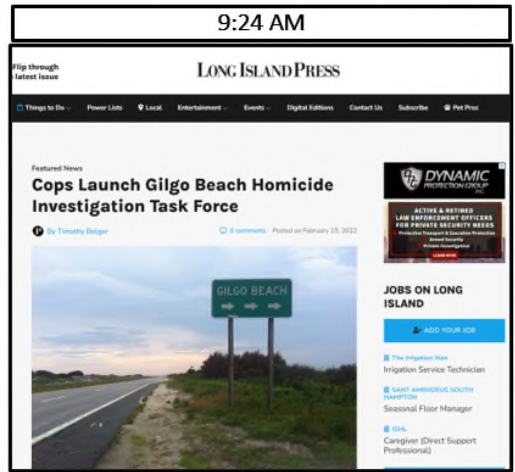
The Thawk Email Account was also used to search for a number of podcasts and/or documentaries regarding this investigation, as well as repeatedly viewing hundreds of images depicting the murdered victims and members of their immediate families.

Significantly, Defendant Heuermann also searched for and viewed articles concerning the very Task Force that was investigating him:

March 28, 2022 - 9:19 AM – 9:25 AM → Searched “long island serial killer” (4x)



<https://www.google.com/url?q=https://www.oxygen.com/crime-news/new-task-force-aims-to-solve-long-island-serial-killer-case%3F&usq=AOvVaw3fo7ePpFYhqMpkYS4XxyTg>

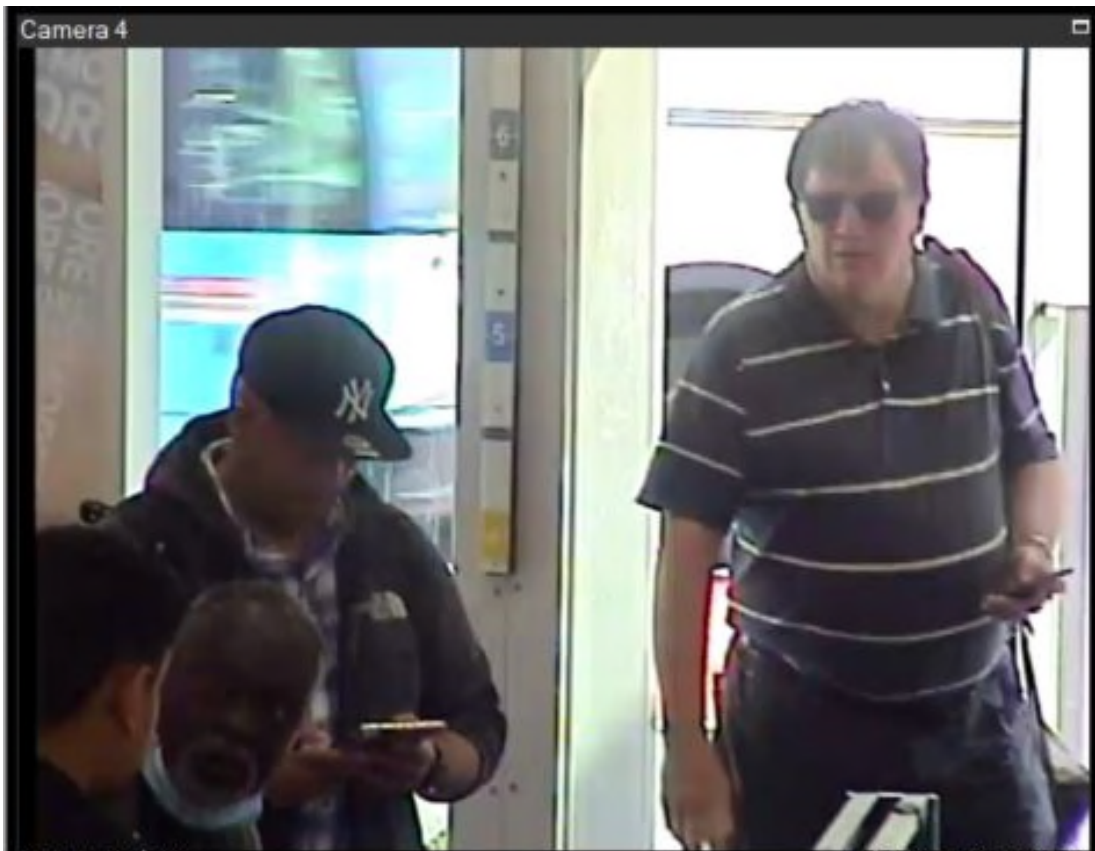


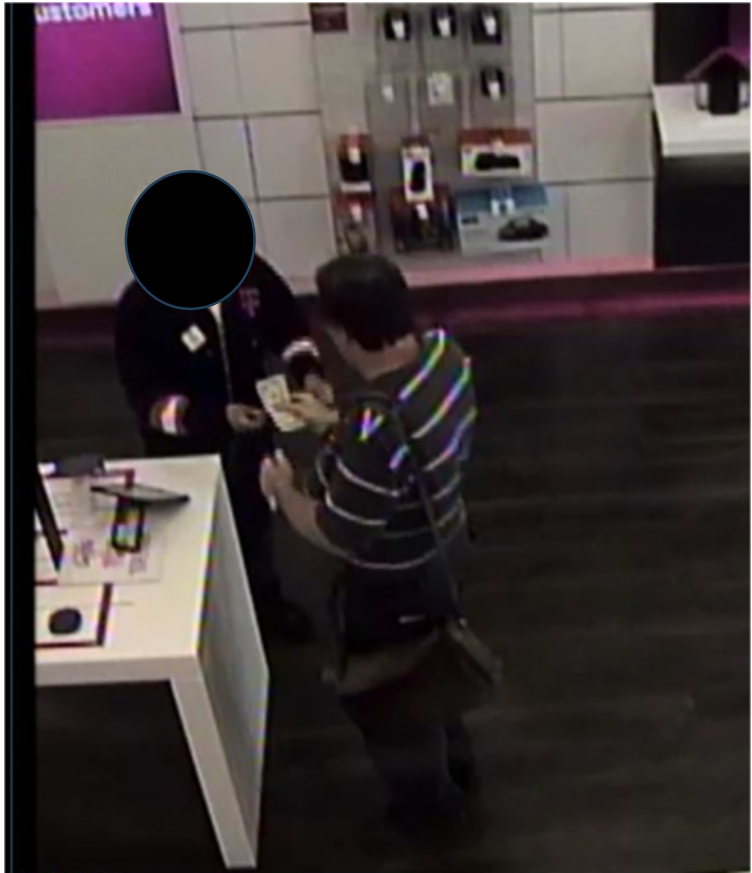
<https://www.longislandpress.com/2022/02/15/cops-launch-gilgo-beach-homicide-investigation-task-force/>

A search warrant conducted on the fictitious Springfieldman9 AOL Account further revealed “selfie” photographs that appeared to have been taken by Defendant Rex Heuermann of himself (see below) and sent to other persons to solicit and arrange for sexual activity, further linking Heuermann to the fictitious email account and the burner cellphone, 347-304-2671, used to establish the account.



Defendant Rex A. Heuermann was further linked to the burner cellphone 347-304-2671, because on May 19, 2023, Defendant Heuermann was observed by law enforcement via video and field surveillance, at a cellphone store in Midtown Manhattan, and purchased additional minutes which were added to this burner cellphone (see images below).





Analysis of the Springfieldman9 AOL Account also led to the discovery of another email account, Hunter1903a3@gmail.com (hereinafter the “Hunter1903a3 Google Account”), used on February 14, 2021, to send an image of a prostitute from upstate New York between two of Heuermann’s secret email accounts. Further investigation revealed that the Hunter1903a3 Google Account was created on February 14, 2021, using burner cellphone 347-885-1697 as the user’s phone number and SMS recovery number, and subscribed in the fictitious name “Andy Roberts” (the same fake name linked to the Target Tinder Profile and burner cellphone 347-885-1697, as well as the same alias utilized by Defendant Heuermann in communications with numerous potential sex partners responding to his advertisements for sex) and the fictitious birthday of August 6, 1972 (which corresponds to the digital ending of the burner account Thawk080672@gmail.com). In addition, Google provided IP Address information for the user’s acceptance of the Terms of Service, which revealed that the Terms of Service were accepted on February 14, 2021, from IP address, 24.184.75.31. Significantly, records were obtained from Altice, doing business as “Optimum,” which is an internet services provider, indicating that the IP Address at Defendant Heuermann’s home address was also 24.184.75.31.

Moreover, based upon SCPD records for the official website Gilgonews.com, a website maintained by the SCPD to disperse news pertaining to this investigation, Defendant Heuermann’s home IP Address was used on May 23, 2020, and July 3, 2020, to access the official news concerning this investigation. Records obtained from JetBlue also show that the same IP address was also utilized to book flights for Defendant Heuermann and his wife in 2018.

When analyzing the usage of all devices and accounts used by Defendant Heuermann, there appears to be a clear pattern wherein Heuermann used “burner” phones and “burner”/“junk” email addresses to 1) contact sex workers and sex partners, to conduct extensive searches related to sex and

prostitution, violent, sadistic and child pornography and 3) seek online information about the authorities investigating his crimes. These burner cellphones and email accounts with fictitious identities were used in an effort to conceal Heuermann's true identity, conceal his criminal activity, unlawfully proposition sex workers, and attempt to monitor the investigation of his crimes.

DNA Analysis of Hairs Recovered from the Examination of the Victims' Bodies

During the course of this investigation, each of the four victims' bodies were examined by a Forensic Scientist with the Suffolk County Crime Laboratory, which revealed as follows:

Maureen Brainard-Barnes

Ms. Brainard-Barnes had been left restrained by 3 leather belts, one of which was utilized to tie Barnes' feet/ankle/legs together. During the examination of the belts, a female human hair was recovered from the buckle of one of the belts by the Suffolk County Crime Lab (hereinafter "Female Hair on Barnes"). On or about December 18, 2010, the Suffolk County Laboratory this hair and was able to determine that it corresponded to a "Caucasian head hair fragment." Although this hair was not suitable for nuclear DNA profiling at that time, it was subsequently submitted for further DNA analysis (see below).

Megan Waterman

Megan Waterman had been bound by clear or white duct tape. During the course of the examination of Ms. Waterman's body, two female human hairs were recovered, one "from outside the head area" and the other from "the tape of the head area." Both hairs were recovered in the vicinity of Ms. Waterman's head (hereinafter "Two Female Hairs on Waterman"). Examination by the Suffolk County Laboratory indicated that the Two Females Hairs on Waterman exhibited Caucasian/European characteristics, but were unsuitable for further DNA testing at that time. The Two Female Hairs on Waterman were subsequently submitted for further DNA analysis (see below).

Amber Costello

An examination of the body of Ms. Amber Costello revealed that she appeared to have been bound by 3 pieces of clear or white duct tape. During the course of the examination of Ms. Costello's body, a female human hair was recovered, specifically on a piece of tape, inside of the burlap wrapping, in the vicinity of Ms. Costello's head (hereinafter "Female Hair on Costello"). A subsequent examination of the Female Hair on Costello led to the determination that it had Caucasian/European characteristics, however, it was unsuitable for further DNA testing at that time by the Suffolk County Crime Laboratory. The Female Hair on Costello was subsequently submitted for further DNA analysis (see below).

Forensic Laboratory #1

As noted above, the Female Hair on Barnes, Two Female Hairs on Waterman and Female Hair on Costello (collectively, the "Female Hairs Recovered on the Three Victims"), were all sent to an outside forensics laboratory (hereinafter "Forensic Laboratory #1"). Forensic Laboratory #1 applies DNA techniques and direct genome sequencing in difficult-to-solve forensic casework and the identification of human remains.

In or about July 2022, Forensic Laboratory #1 was able to determine that each of the aforementioned Female Hairs Recovered on the Three Victims each belonged to a female individual in mitochondrial haplogroup K1c2 and that this female was not any of the victims.

On or about July 21, 2022, an undercover SCPD Detective recovered eleven (11) bottles from a trash receptacle that had been left out for collection in front of the residence of Defendant Rex A. Heuermann. The Suffolk County Crime Laboratory took swabs of said bottles, which were subsequently sent to Forensic Laboratory #1 for DNA profiling.

Based on these new submissions, on or about February 24, 2023, Forensic Laboratory #1 was able to conclude that one of the DNA profiles generated from the aforementioned bottles taken from Defendant Heuermann's residence indicated a female individual belonging to mitochondrial haplogroup K1c2 (which is the same mitochondrial haplogroup as the Female Hairs Recovered from the Three Victims). This profile was then compared against the previously-tested female hair sample recovered on the remains of Ms. Megan Waterman, which indicated that the two "belong to the same individual or someone closely related." Based upon the investigation and evidence recovered to date, that female is believed to be the wife of Defendant Heuermann.

Forensic Laboratory #2

On or about March 23, 2023, the Suffolk County Crime Laboratory requested Forensic Laboratory #2, a lab specializing in forensic mitochondrial analysis, to conduct additional, independent analysis. On or about June 12, 2023, Forensic Laboratory #2 issued a report concluding that the DNA sample from the female recovered from the bottles outside the residence of Defendant Heuermann (i.e., Heuermann's wife) and the Female Hair on Costello indicated that the "mitochondrial DNA profile(s) are the same at all compared positions common to and between samples," specifically at a rate that would, as per the EMPOP database,⁵ exclude 99.98%⁶ of the North American population from the Female Hair on Costello.

⁵ EMPOP is shorthand for the "European DNA Profile Group (EDNAP) mitochondrial DNA Population Database," which is a web-based collection of human mitochondrial sequence data from various populations worldwide. The North American database includes 12,386 sequences of North American forensic significance.

⁶ This statistical analysis incorporates a 95% "confidence level" or margin of error as the North American database does not include every single DNA sequence of North American forensic significance, which would require the "typing" of every individual in the population. *See Exhibit B*, Statistical Reporting for an in-depth explanation regarding "confidence levels."

Forensic Laboratory #2 then compared the profile associated with the DNA sample from Heuermann's wife to one of the two aforementioned female hairs recovered on the remains of Ms. Waterman, which also resulted in the conclusion that the "mitochondrial DNA profile(s) are the same at all compared positions common to and between samples," specifically at a rate that would, as per the EMPOP database, exclude 99.69% of the North American population from the hair recovered on Ms. Waterman.

Based on the foregoing, while 99.98% of the North American population can be excluded from the FEMALE HAIR ON COSTELLO and 99.69% of the North American population are excluded from the FEMALE HAIR ON WATERMAN, it is significant that RH's wife cannot be excluded from either the female hairs recovered on the remains of Megan Waterman and Amber Costello. As previously noted, Defendant Heuermann's wife was out-of-state at the time of Ms. Waterman and Ms. Costello's disappearance and murders. As such, it is likely that the burlap, tape, vehicle(s) or other instrumentalities utilized in furtherance of these murders came from Defendant Heuermann's residence, where his wife also resides, or was transferred from his clothing.

Male Hair Linked to Defendant Heuermann

During the initial examination of Ms. Waterman's skeletal remains and the burlap materials, the Suffolk County Crime Laboratory was also able to recover a male hair from the "bottom of the burlap" used to wrap Ms. Waterman by her killer (hereinafter "MALE HAIR ON WATERMAN"). An initial examination of said hair revealed Caucasian/European characteristics. However, the hair was unsuitable for further DNA analysis at that time by the Suffolk County Crime Laboratory. This hair was subsequently submitted for further DNA analysis and on or about July 31, 2020, Forensic Laboratory #1 was able to generate a DNA profile for the hair recovered on the

bottom of the Waterman burlap. Specifically, Forensic Laboratory #1 determined that this hair belonged to a male in mitochondrial haplogroup V7a.

Following the discovery of the Chevrolet Avalanche, which was registered to defendant Heuermann, and the investigation of cellular billing records and other items, on or about January 26, 2023, a surveillance team observed and recovered a pizza box thrown by Defendant Rex A. Heuermann into a garbage can located in front of 385 5th Avenue in Manhattan (see below).





This pizza box was sent to the Suffolk County Crime Laboratory for analysis, where a swab was taken from the leftover pizza crust. On or about March 23, 2023, the Suffolk County Crime Laboratory sent the swab from the pizza crust abandoned by Defendant Heuermann to Forensic Laboratory #2.

On or about April 28, 2023, a detective hand-delivered from Forensic Laboratory #1 a portion of MALE HAIR ON WATERMAN to Forensic Laboratory #2 for testing.

On or about June 12, 2023, Forensic Laboratory #2 was able to determine as to the MALE HAIR ON WATERMAN and the swab from the pizza crust, that the “mitochondrial DNA profile(s) are the same,” specifically at a rate that would, as per the EMPOP database, exclude 99.96% of the North American population from the MALE HAIR ON WATERMAN. Based on the foregoing, while 99.96% of the North American population can be excluded from the MALE HAIR ON

WATERMAN, it is significant that Defendant Heuermann cannot be excluded from the male hair recovered near the “bottom of the burlap” utilized to restrain and transport Megan Waterman’s naked and deceased body.

Arrest and Search of Heuermann, His Residence and Other Locations

On or about the evening of July 13, 2023, Defendant Rex A. Heuermann was arrested by Suffolk County Police Officers. Searches of his residence, as well as other locations are currently ongoing. At the time of his arrest, Defendant Heuermann had on his person the burner cellphone 347-304-2671 which was linked to the Thawk Email Account used to conduct the online searches described above.

Penalties

If convicted on the current charges, Defendant Rex A. Heuermann faces multiple sentences of life without parole.


Remand Without Bail is Appropriate

Based on the serious, heinous nature of these offenses, the strength of the People’s case, the life incarceration the defendant faces upon conviction, the extreme measures this defendant took to attempt to avoid apprehension for an extended period of time, the recent sadistic and child pornography searches, use of fictitious names, email and cellphone “burner” accounts, online counter-

surveillance and his access to and history of possessing firearms, the People believe that the only means to ensure the defendant's return to court is to remand the defendant without bail.

DATED: July 14, 2023
Suffolk County, New York

RAYMOND A. TIERNEY
DISTRICT ATTORNEY

By: 
Allen L. Bode
Chief Assistant District Attorney