#### SUPREME COURT OF SUFFOLK COUNTY STATE OF NEW YORK

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THE PEOPLE OF THE STATE OF NEW YORK,

- against -

#### C.P.L. §530.40 BAIL APPLICATION

REX A. HEUERMANN,

Indictment No. 71635-24

(Mazzei, J.)

Defendant.

On 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.

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On January 16, 2024, Defendant Rex A. Heuermann was charged by the Grand Jury in a Superseding Indictment, Suffolk County Indictment # 70126-24, which incorporated 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.

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Today, Defendant Rex A. Heuermann stands before this Court charged by the Grand Jury in another Superseding Indictment, which incorporates each and every one of the above counts, as well as the additional charges 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 Jessica Taylor on or about or between July 21-26, 2003; 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 Sandra Costilla on or about and between November 19-20, 1993.

The People filed a written bail application at Rex A. Heuermann's initial arraignment, which occurred on July 14, 2023, as well as at Defendant's arraignment on the initial Superseding Indictment, which occurred on January 16, 2024. Those applications are 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 new Superseding Indictment, which will expand on additional evidentiary developments in this investigation now charging Defendant Heuermann with the murders of two additional victims, Jessica Taylor and Sandra Costilla.

Based on Defendant Heuermann's indictment on additional murder charges as it pertains to now a fifth and sixth victim, the serious and 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, 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.

#### The 2003 and 2011 Discovery of the Human Remains of Jessica Taylor

On or about July 26, 2003, an individual whose identity is known to law enforcement (hereinafter "WITNESS 1") was walking his/her dog just west of Halsey Manor Road, Manorville, Suffolk County, NY. At that time, WITNESS 1 observed what appeared to be human remains, which prompted him/her to call 911. Upon arrival, members of the SCPD observed the remains

of a female, later identified as Jessica Taylor. Ms. Taylor was found lying on her back with her legs bent underneath her. Notably, the victim was decapitated and both of Ms. Taylor's arms had been severed from her body below her elbows. Moreover, a tattoo on the victim's torso had been severely obliterated by a sharp object. Investigators believe the mutilation of the victim's tattoo, decapitation of her head, and dismemberment of Ms. Taylor's arms, were acts perpetrated by Rex A. Heuermann to, *inter alia*, inhibit the identification of the victim via facial recognition, fingerprints and/or tattoo identification. During the initial investigation in Manorville in 2003, the victim's head, arms, and hands were not found at the scene and their location remained unknown to law enforcement for approximately eight years.

On March 29, 2011, Ms. Taylor's skull, hands, and forearm were discovered along Ocean Parkway, just east of Gilgo Beach, Suffolk County, NY. Notably, Ms. Taylor's remains were located on the same side of the road from where Maureen Brainard-Barnes, Melissa Barthelemy, Megan Waterman, and Amber Costello (hereinafter the "Gilgo Four") had been found just several months prior in December 2010. Each of the Gilgo Four victims, as well as the skull, hands, and forearm of Ms. Taylor, were recovered on the same side of the road and at a depth of within 50 feet from the edge of the parkway. Furthermore, Ms. Taylor's remains were located less than a mile from where the Gilgo Four were discovered (see embedded image on the following page).

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#### Information Relevant to the Disappearance of Jessica Taylor

Jessica Taylor was last seen on or about July 19, 2003 in New York City. The investigation to date has established that in July 2003, Ms. Taylor was working as a sex worker in the area of Midtown Manhattan.

On July 21, 2003, at approximately 8:41 p.m., Ms. Taylor utilized her cellular phone (hereinafter the "TAYLOR PHONE") to speak to her mother. Based on witness interviews and an analysis of telephone records, the Gilgo Homicide Task Force has learned that the two spoke for approximately seven (7) minutes. During that call, Ms. Taylor had arranged to visit her mother on July 25, 2003, in Poughkeepsie, NY, for her mother's birthday. Less than two hours later, at approximately 10:22 p.m., the TAYLOR PHONE placed an outgoing call, which lasted approximately two minutes. Thereafter, the TAYLOR PHONE records reveal no further outgoing

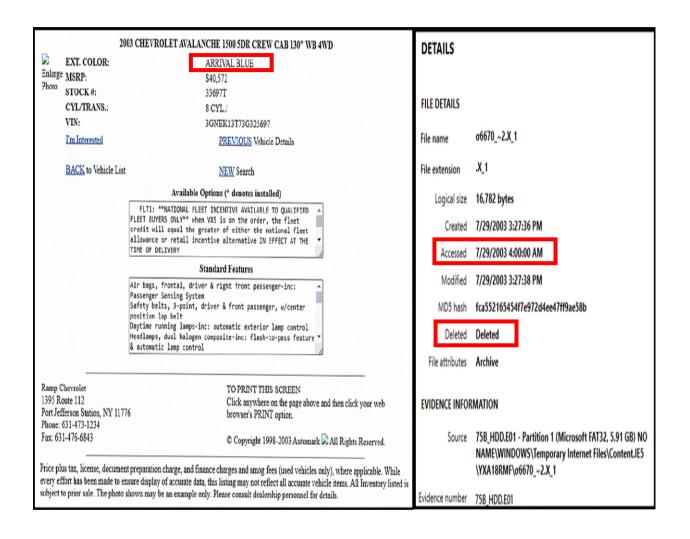
calls or accepted incoming calls. On or about July 25, 2003, when her daughter failed to arrive at her Poughkeepsie residence or answer any phone calls, Ms. Taylor's mother notified law enforcement.

At the time of Ms. Taylor's disappearance, Rex A. Heuermann worked in the same vicinity as where Ms. Taylor was known to "street walk," i.e., work as a sex worker. Records seized during the execution of prior search warrants reveal Heuermann was in fact present in Midtown Manhattan on July 21, 2003, the same date Ms. Taylor disappeared.

On July 26, 2003, and in the days thereafter, members of the SCPD canvassed the area around Halsey Manor Road, Manorville, in the vicinity of where Ms. Taylor's remains had been found. As a result, investigators spoke to a witness who had, on July 25, 2003, at approximately 10:30 p.m., observed a dark-colored Chevrolet pickup truck backed-in to the same wooded area where Ms. Taylor's body was later found. Based upon their investigation, law enforcement determined that these observations would have occurred approximately 13 hours before WITNESS 1's 911 call. Notably, the investigation to date has established that Defendant Heuermann purchased a 2002 dark-colored Chevrolet Avalanche pick-up truck, on or about March 22, 2002, from Ramp Chevrolet in Port Jefferson Station, NY. Accordingly, on July 25, 2003, at 10:30 p.m., Defendant Heuermann would have been in possession of a vehicle matching the description of the one observed in the vicinity of where Ms. Taylor's remains had been found on Halsey Manor Road.

A forensic analysis of Rex A. Heuermann's digital devices also revealed the following: (1) that on or about July 28, 2003, Rex A. Heuermann accessed a Newsday Article entitled, "Cops Seek Help in IDing Manorville Body," regarding the discovery of Ms. Taylor's human remains. That online activity was subsequently deleted; and (2) on or about July 29, 2003, Rex A. Heuermann conducted an internet search for a new Chevrolet Avalanche despite his 2002 Avalanche being just over one year old (see embedded image below). The analysis further shows Heuermann also

attempted to delete this search for a new vehicle. *Id.* Notably, this activity occurred just days after Ms. Taylor was discovered and just days after witnesses observed a vehicle matching the physical description of Heuermann's leaving the scene.



Finally, while the make and model of the vehicle Heuermann searched for is the same as his 2002 vehicle (Chevrolet Avalanche pick-up truck), the exterior color is different, i.e., "Arrival Blue" (see embedded image below), as well as another in "Summit White," which are significantly brighter exterior paint offerings by Chevrolet when compared to Heuermann's dark-green 2002 Chevrolet Avalanche.



#### Hairs Recovered from the Remains of Jessica Taylor

During the course of this investigation, Ms. Taylor's body was examined by a Forensic Scientist with the Suffolk County Crime Laboratory (hereinafter "SCCL"), which revealed that Ms. Taylor had been decapitated, dismembered at her arms below her elbows, and revealed "irregular disruption" of the victim's nipples<sup>1</sup> and the "obliteration" of her tattoo. During the examination of Ms. Taylor's body, a male human hair was recovered, specifically from a surgical drape that had been underneath the victim (hereinafter "Male Hair Underneath Taylor"). A subsequent examination of the Male Hair Underneath Taylor led to the determination that it was a human head hair with Caucasian/European characteristics; however, it was, based on the DNA testing capabilities at the SCCL, unsuitable for further DNA testing at that time.

On or about August 24, 2023, the Gilgo Homicide Task Force brought a cutting of the Male Hair Underneath Taylor to an outside forensics laboratory (previously referred to in *Exhibit A* as "Forensic Laboratory # 2"), which specializes in forensic mitochondrial analysis. On or about February 1, 2024, Forensic Laboratory # 2 issued a report concluding that the mitochondrial DNA profile developed from the Male Hair Underneath Taylor and the profile developed from Defendant's buccal swab are the same, specifically at a rate that would, as per the EMPOP database,<sup>2</sup> exclude 99.96% of the North American population as the contributor of said hair recovered underneath the decapitated and dismembered remains of Jessica Taylor. While 99.96% of the North American population of the Male Hair Underneath Taylor, Defendant Heuermann cannot be excluded as the contributor of the said hair recovered underneath the remains of Jessica Taylor.

On or about March 8, 2024, the Gilgo Homicide Task Force brought a cutting of the Male Hair Underneath Taylor and a DNA extract of Rex A. Heuermann's buccal swab to an outside,

<sup>&</sup>lt;sup>1</sup> Witnesses from the Suffolk County Medical Examiner's Office have determined that the "irregular disruption" of the victim's nipples did not occur naturally, and one possible cause of such disruption is the post-mortem mutilation of the victim's nipples.

<sup>&</sup>lt;sup>2</sup> 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.

independent laboratory (previously referred to in *Exhibit A* as Forensic Laboratory # 1), which applies DNA techniques and direct genome sequencing in difficult-to-solve forensic casework and the identification of human remains.

On or about April 29, 2024, Forensic Laboratory # 1 issued a report indicating it had developed a nuclear DNA profile for not only the Male Hair Underneath Taylor, but also from Rex A. Heuermann's buccal swab. Forensic Laboratory # 1 was then able to conduct a one-to-one autosomal nuclear DNA comparison between said profile (developed from the Male Hair Underneath Taylor) to Rex Heuermann's SNP Genotype File (developed from his buccal swab), which resulted in the conclusion that the DNA profile generated from the Male Hair Underneath Taylor is  $1.837 \times 10^{603}$  times more likely to have come from a person genetically identical to Rex Heuermann's SNP Genotype File than from an unrelated individual.<sup>3</sup>

Based on the foregoing, it is significant that two forensic laboratories have now independently determined that the aforementioned hair recovered from the surgical drape underneath the remains of Jessica Taylor, are substantially more likely to have derived from a person genetically identical to Defendant Heuermann's mitochondrial and nuclear profiles, which provides further support that Rex A. Heuermann murdered, dismembered, decapitated, and transported the remains of Jessica Taylor to Manorville and Gilgo Beach until the victim's remains were ultimately discovered in July 2003 and March 2011, respectively.

#### Heuermann's Family Travel in Relation to the Disappearance of Jessica Taylor

As part of the ongoing investigation, the Gilgo Homicide Task Force has also established that Heuermann's wife and children were out of state at the time of Ms. Taylor's disappearance

<sup>&</sup>lt;sup>3</sup> The 1.837 x  $10^{603}$  statistic, and the following statistical probabilities, are provided in scientific notation. The standard notation for 1.837 x  $10^{603}$  is 1,837 with 600 zeros thereafter.

and murder, a consistent theme attributable to the Defendant for each of the charged homicides thus far, which would have allowed the Defendant unfettered time and opportunity to execute these crimes.

Specifically, in 2002-2003, Defendant Heuermann's daughter, Victoria, was a Kindergarten student at the McKenna Elementary School located in Massapequa Park, NY. At the time, Victoria was classmates with an individual whose identity is also known to law enforcement (hereinafter "WITNESS 2"). Based on post-arrest interviews with witnesses, including WITNESS 2's family and Victoria Heuermann, the Gilgo Homicide Task Force has learned that, at the conclusion of the kindergarten school year, Ms. Ellerup and her two children vacationed with WITNESS 2's family from on or about July 20, 2003 through on or about July 27, 2003 at Smuggler's Notch Resort, which is located in Jeffersonville, VT. Rex A. Heuermann did not attend this trip.

These witness accounts have been corroborated via telephone records and electronic data seized during the execution of the July 2023 search warrants. For example, agents of the Gilgo Homicide Task Force seized AT&T records, which detail calls made to and from the Heuermann residence in July 2003 (see embedded excerpt on the following page). These records show that during the aforementioned family vacation, the landline telephone associated with the Heuermann residence, which was located at 105 First Avenue, Massapequa Park, NY (hereinafter "TARGET RESIDENCE") made several phone calls to a telephone number bearing an (802) area code. Further investigation has tied this phone number to Smuggler's Notch Resort. Thus, investigators believe Defendant Heuermann made these calls, from TARGET RESIDENCE in Massapequa Park, to his family staying in Jeffersonville, VT.

Customer Service: 1 800 288-2747 Text Phone (TTY): 1 800 833-3232 Internet Address: www.att.com

Jul 11-Aug 10, 2003 Customer ID: 516 798-6891 Page 6 of 8

## **AT&T Long Distance Services**

#### Jul 11 - Aug 10, 2003

Charges for 516 798-6891:	
AT&T Easy Reach <sup>™</sup> 800 Service	
AT&T direct dialed calls	
Other charges and credits	
Taxes and surcharges	
Total AT&T Long Distance Services	

#### AT&T Easy Reach<sup>sM</sup> 800 Service

There was no activity on your AT&T Easy Reach<sup>SM</sup> 800 Service this month. Your personal 800 number is the easiest, most convenient way to keep in touch with the people who matter most to you.

### AT&T direct dialed calls

#### **Domestic calls**

			-					
	Date	Number called	Where	Time	Rate	Туре	Min	Amount
8 9 10 11 12 13 14 15 16 17	Jul 10	845 928-2304	HighLandMI,NY	1:03pm	day	direct	6	1.92
9	Jul 10	518 371-1007	Cliftn Prk,NY	7:32pm	eve	direct	3	.54
10	Jul 16	845 928-2304	HighLandMI,NY	12:56pm	day	direct	5	1.60
11	Jul 22	856 261-1275	Haddon Hts,NJ	10:08am	day	direct	1	.35
12	Jul 22	802 644-8851	JefersonvI,VT	1:41pm	day	direct	2	.70
13	Jul 22	802 644-8851	JefersonvI,VT	6:25pm	day	direct	16	5.60
14	Jul 26	802 644-8851	Jefersonvi,VT	10:31pm	night	direct	16	3.28
15	Jul 29	434 589-1691	Palmyra,VA	9:20pm	010	direct	20	4.90
16	Aug 6	518 371-1007	Cliftn Prk,NY	6:47pm	day	direct	21	5.60
17	Aug 9	518 371-1007	Cliftn Prk,NY	4:36pm	night	direct	5	.75

The Gilgo Homicide Task Force also seized phone records attributable to Heuermann's Manhattan business, RH Consultants and Associates. These records further corroborate Heuermann's stay in New York and the family's travel to Jeffersonville, VT as Heuermann's work landline makes numerous calls, during the same week of July 20-27, 2003, from Manhattan, NY to the Smuggler's Notch Resort (see embedded image below).

		RH	count Name I CONSULTA SOCIATES		ND		Account 008			Bill Date 7/31/03
Current Charges	s Local S	ervice			Cur	rent Char	ges Lo	ng Distance	Servic	e
Local Comica Channe Commen			Amount						Minutes	Amount
Local Service Charge Summary Billing Account 212-947-1925			000 40		ched 1					
Total Local Service Charges			309.13 309.13		rastate	0		7	13.5	1.07
rotal 2004 oct the onalyes			309.13		erstate	Usage ched 1+		41	176.8	10.61
				1018	II SWILC	ined 1+		48	190.3	11.68
								Quantity	Each	Amount
Local Service Charge	es for 21	2-947-192	25		thly Se					
			Amount		C Char			5	4.30	21.50
Monthly Recurring Charges			Amount	Tota	Mont	hly Service				21.50
For Aug 1, 2003 To Aug 31, 2003				Taxe	s					
the second se		91.20	Exci	se Tax		.90	Federal Exc	ise Tax	1.12	
FCC Subscriber Line Charge			40.40	Fed	USF Co	ombined	3.05	NY 186 Stat	e Surchae	.22
Local Number Portability Surch			1.15			urcharge	.04	State Sales		.05
911 Surcharge			5.00		Sales T		.05			
Total Monthly Recurring Charges		10.0	137.75	Tota	I Taxes	5			_	5.43
Measured Services Area	Calls	Minutes	Amount	Tota	I Long	Distance Ser	vice			38.61
New York City	644	4,527.0	82.55				Call [	Detail	There is a set to a set	the second second
Lower Westchester	1	2.0	.17		15.00					
Nassau Mast O. Kall	108	390.0	32.28	Date	Time	Called Locat	tion *	Called Numbe	r Minutes	Amount
West Suffolk Total Measured Services	12	34.0	2.84		LS FOR	R 212-947-192	25			
Total measured Services	765	4,953.0	117.84	7/15	03:51P 05:03P	BOONTON NJ CALDWELL NJ	1+ 1+	973-316-5998		.03
	Qty	Rate	Amount	7/17	05:46P	CARLOCK IL	1+	862-881-2897 309-376-2056	8. 9.0	.05
Local Calls				7/18	01:58P 07:10P	ALLENTOWN P		610-391-7478 609-426-0730	.9	.05
Directory Assistance Calls	5	.7500	3.75	7/21	07:12P	ALLENTOWN P	A 11	610-391-7478	1.0	.04
Total Local Calls			3.75	7/21 7/21	07:23P 09:21P	JEFFERSNVL V		802-644-8851 802-644-8851	1.3 3.1	.08
				7/21	09:59P	OMAHA NE	1+	402-517-9978	.5	.03
Taxes				7/24 7/24	07:29P 08:46P	JEFFERSNVL V		802-644-8851 802-644-8851	1.1 2.7	.07
Excise Tax 6.59	Federal I	Excise Tax	8.14	Res Strondennike		2-947-1925		002-044-0001	21.6	.16

Finally, in July 2023, the Gilgo Homicide Task Force seized a hard drive from the basement of TARGET RESIDENCE. An extraction and analysis of that hard drive revealed that it contained a Palm Pilot back-up file, which appeared to contain Defendant Heuermann's "date book" or calendar for the relevant dates. The Gilgo Homicide Task Force subsequently hired a digital forensics expert who, by utilizing native Palm software, was able to convert the above data into a readable format (see embedded image below).

Date Boo	ok for HeuermR		July 10, 2003 - July
:00p - 2:00p:	RABCO re. Cooling tower	6:00p - 7:00p:	DINNER WITH WIFE
:00p - 7:00p:	Amity meeting		Sunday 7/20/2003
	Friday 7/11/2003	8:00a - 9:00a:	WIFE IN VT. AT SMUGS.
0:00a - 11:00a:	MEET BILL IRONS AT 25 B'WAY FO	R 4TH 11:00a - 12:00p	HIGHPOWER PECONIC
	Sunday 7/13/2003		Monday 7/21/2003
1:00a - 12:00p:	campsmith match	8:00a - 9:00a: 11:00a - 12:00p:	
	Monday 7/14/2003	5:00p - 6:00p:	back up 301339054-off rh PPC MATCH
:00a - 10:00a:	insp 100 3rd ave for elev #8 SHAFT STEEL. meet kenny mainco elev o	FOR	Tuesday 7/22/2003
0.00= 11.00=	conflict with DOB set up for 609 greenwich st meeting	8:00a - 9:00a:	WIFE IN VT. AT SMUGS.
	11:20 & 11:40 BX DOB FOR KNINGSBRIDGE PAA	9:00a - 10:00a:	Const/Eng meet @ BH
2:00p - 1:00p:	MH TO START S/O 83 MAIDLAN LA	NE	Vednesday 7/23/2003
	PHASE 1	8:00a - 9:00a:	WIFE IN VT. AT SMUGS.
	Tuesday 7/15/2003		Thursday 7/24/2003
:00a - 10:00a:	Const/Eng meet @ BH	8:00a - 9:00a:	WIFE IN VT. AT SMUGS.
2:00p - 1:00p:	11:30 meet gary re: 609 greenwich s 575 madison, 4th floor	at	SITE INSP @ 25 CPW 212.977 917.414.1439
W	/ednesday 7/16/2003		Friday 7/25/2003
:00a - 10:00a:	pick up derek at 6 am for airport	8:00a - 9:00a:	WIFE IN VT. AT SMUGS.
0:00a - 11:00a:	2:30 Dr. Peller 796-2222-	2:00p - 3:00p:	2:30 kedher dup comm at man
1:00a - 12:00p:	10:30 T. Ferillo Dup. Comm in Bk re N 5 St.	: 267	west 23 st letter of no objection
2:00p - 1:00p:	queens DOB pick up approved folde		Saturday 7/26/2003
	401692664 12-01 44 ave	8:00a - 9:00a:	WIFE IN VT. AT SMUGS.
1	Thursday 7/17/2003		Sunday 7/27/2003
:00a - 10:00a:	insp 100 3rd ave for elev #8 SHAFT STEEL. meet kenny mainco elev.	FOR 8:00a - 9:00a:	WIFE IN VT. AT SMUGS.
0:00a - 11:00a:	Block hall viol hearing-LL10 facad	10:00a - 11:00a:	
2:00p - 3:00p:	Meet Geo.I Raiver at office to set-up court	for 10:00a - 11:00a:	ON BAND SAW. DEREK AT HOUSE TO CUT 6X ON BAND SAW.
	Friday 7/18/2003	12:00p - 1:00p:	Campsmith Match
1:00a - 12:00p:	L. Lanza at office at 11:00 am to go of west 23 st.	ver	Monday 7/28/2003
:00p - 2:00p:	267 north 5 st- FA recoc	10:00a - 11:00a:	CONC POUR AT 21 SW
and a second			
		1	

Based on the foregoing, the investigation to date has clearly established Defendant Heuermann's wife and children were indeed located out of state during the time of Jessica Taylor's disappearance, which occurred on or about July 21, 2003. Accordingly, the murders of all four charged victims, and now the murder of Ms. Taylor, occurred at times when Defendant Heuermann's wife and children were located out of state, which would have allowed Defendant Heuermann unfettered time to execute his plans for Ms. Taylor, which included the decapitation, dismemberment, and transportation of her remains, without any fear that his family would uncover or learn of his involvement in these crimes.

#### The 1993 Discovery of the Human Remains of Sandra Costilla

On or about November 20, 1993, two individuals, while hunting in a wooded area of Southampton, in the vicinity of 50 Old Fish Cove Road, North Sea, Suffolk County, NY, discovered the remains of Sandra Costilla, DOB: 8/25/1965. The victim, who had been 28-years old at the time, was lying on her back with her arms outstretched over her head with her uncovered legs spread apart. The victim's shirt had been pulled up over her torso and head, exposing the victim's breasts. The victim had numerous sharp force injuries to, *inter alia*, her face, torso, breasts, left thigh, and vaginal area.

Ms. Costilla was a native of Trinidad and Tobago but had been living in New York prior to her disappearance and murder.

#### Hairs Recovered from the Remains of Sandra Costilla

During the course of the 1993 investigation, Ms. Costilla's body was examined by a Forensic Scientist with the SCCL, which led to the recovery of, *inter alia*, three hairs from the victim's remains, one from the victim's right arm (hereinafter "Female Hair on Costilla"), one from a tape-lift of the striped shirt above the victim's head (hereinafter "Male Hair on Costilla"),

as well as one from a tape-lift of the white shirt above the victim's head (hereinafter "Unidentified Female Hair on Costilla") (collectively "Hairs on Costilla").

In 2014, well before the identification of Rex A. Heuermann as a suspect in Ms. Costilla's murder, the Hairs on Costilla were sent to Forensic Laboratory # 2, which was able to develop unique mitochondrial DNA profiles for each of the Hairs on Costilla. On or about August 1, 2014, Forensic Laboratory # 2 received an extract of John Bittrolff's buccal swab. Forensic Laboratory # 2 was then able to develop a mitochondrial DNA profile from John Bittrolff's buccal swab and subsequently compared it to the mitochondrial DNA profiles that had been previously generated for each of the Hairs on Costilla. At the conclusion of its analysis, Forensic Laboratory # 2 was able to exclude John Bittrolff, and his maternal relatives, as contributors of the Hairs on Costilla.

Recently, the Gilgo Homicide Task Force requested Forensic Laboratory # 2 undergo forensic testing, specifically comparing mitochondrial DNA profiles for each of the Hairs on Costilla, which had been developed back in 2014, prior to Heuermann emerging as a suspect in Ms. Costilla's murder, to known samples provided by the Gilgo Homicide Task Force. On or about February 29, 2024, Forensic Laboratory # 2 issued a report concluding that the mitochondrial DNA profile developed from the Male Hair on Costilla and the profile developed from Defendant's buccal swab are the same, specifically at a rate that would, as per the EMPOP database, exclude 99.96% of the North American population as the contributor of the aforementioned hair recovered on the mutilated remains of Sandra Costilla. Based on the foregoing, while 99.96% of the North American population can be excluded as the contributor of the Male Hair on Costilla, Defendant Heuermann cannot be excluded as the contributor of the Male Hair on Costilla.

Prior to Ms. Costilla's disappearance and murder, Defendant Heuermann had been living with a female individual, whose identity is known to law enforcement (hereinafter "WITNESS

3"). During the course of this investigation, the Gilgo Homicide Task Force was able to secure a buccal swab from WITNESS 3, which was secured via her consent.

On or about March 29, 2024, the Gilgo Homicide Task Force brought a DNA extract of WITNESS 3's buccal swab to Forensic Laboratory # 2 for further analysis. On or about May 8, 2024, Forensic Laboratory # 2 issued a report concluding that the mitochondrial DNA profile developed from WITNESS 3's buccal swab and the profile developed from the Female Hair on Costilla "share a common base at all compared positions," specifically at a rate that would, as per the EMPOP database, exclude 99.98% of the North American population as the contributor of said hair recovered on the mutilated remains of Sandra Costilla. While 99.98% of the North American population can be excluded as the contributor of the Female Hair on Costilla, WITNESS 3, who had, but no longer resided at TARGET RESIDENCE prior to Ms. Costilla's disappearance and murder, cannot be excluded as the contributor of said hair recovered on Ms. Costilla.

On or about March 8, 2024, the Gilgo Homicide Task Force brought a cutting of the Hairs on Costilla, as well as a DNA extract of WITNESS 3's buccal swab, to Forensic Laboratory # 1 for further, independent analysis. On or about April 29, 2024, Forensic Laboratory # 1 issued a report indicating its ability to develop a nuclear DNA profile for the Male Hair on Costilla. Forensic Laboratory # 1 was then able to conduct a one-to-one autosomal nuclear DNA comparison between said profile (developed from the Male Hair on Costilla) to Rex A. Heuermann's SNP Genotype File (developed from his buccal swab), which resulted in the conclusion that the DNA profile generated from the Male Hair on Costilla, which was recovered from Ms. Costilla's mutilated remains, is  $4.347 \times 10^{332}$  times more likely to have come from a person genetically identical to Rex Heuermann's SNP Genotype File than from an unrelated individual.<sup>4</sup>

Forensic Laboratory # 1 was also able to generate nuclear DNA profiles from not only the extract of WITNESS 3's buccal swab, but also the Female Hair on Costilla. Forensic Laboratory # 1 was then able to conduct a one-to-one autosomal nuclear DNA comparison between said profile (developed from WITNESS 3's buccal swab) to the SNP Genotype File developed from the Female Hair on Costilla, which resulted in the conclusion that the DNA profile generated from the Female Hair on Costilla, is  $4.578 \times 10^{1040}$  times more likely to have come from a person genetically identical to WITNESS 3's SNP Genotype File than from an unrelated individual.<sup>5</sup>

Based on the foregoing, it is significant that two forensic laboratories have now independently determined that male hair recovered from the mutilated remains of Sandra Costilla, is substantially more likely to have derived from a person genetically identical to Defendant Heuermann's mitochondrial and nuclear profiles. Additionally, both laboratories were also able to forensically tie WITNESS 3, who had resided at TARGET RESIDENCE prior to Ms. Costilla's disappearance and murder, to the female hair recovered on Ms. Costilla's remains. The foregoing provides further support that Rex A. Heuermann mutilated, murdered, and transported the body of Sandra Costilla to Southampton.

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The chart below summarizes the results from Forensic Laboratory # 1 and Forensic Laboratory # 2, which each individually have been able to determine that hairs recovered on now five of the six charged victims are forensically tied to Defendant Heuermann, members of his immediate family, or individuals with whom Heuermann resided, lending further support to the

<sup>&</sup>lt;sup>4</sup> The standard notation for  $4.347 \times 10^{332}$  is 4,347 with 329 zeros thereafter. The investigation into the contributor of the Unidentified Female Hair on Costilla remains ongoing.

<sup>&</sup>lt;sup>5</sup> The standard notation for  $4.578 \times 10^{1040}$  is 4,578 with 1,037 zeros thereafter.

conclusion that Defendant Heuermann is the individual who murdered, stripped, restrained, and

transported the remains of Jessica Taylor and Sandra Costilla, as well as the Gilgo Four, until they

were each discovered in 1993, 2003, 2010, and 2011.

VICTIM	DESIGNATION		MITOCHONDRIAL DNA	NUCLEAR (SNP) DNA
	IN BAIL	LOCATION	RESULTS	RESULTS
	LETTER	OF HAIR RECOVERY		
				$4.247 = 10^{22}$ Times No. 1. 1. 1.
SANDRA	MALE HAIR	TAPE-LIFT OF	99.96% of North American	4.347 x 10 <sup>332</sup> Times More Likely
COSTILLA	ON COSTILLA	STRIPED SHIRT	population can be excluded but not <b>REX</b>	to Come From An Individual with
		ABOVE VICTIM'S	HEUERMANN	the Identical Genetic Profile as <b>REX HEUERMANN</b>
		HEAD	HEUERMAININ	KEA HEUEKWANN
SANDRA	FEMALE HAIR	VICTIM'S	99.98% of North American	4 579 x 101040 Times More Likely
COSTILLA	ON COSTILLA			4.578 x 10 <sup>1040</sup> Times More Likely to Come From An Individual with
COSTILLA	ON COSTILLA	RIGHT ARM	population can be excluded but not <b>WITNESS 3</b>	the Identical Genetic Profile as
				WITNESS 3
				WIINESS 5
JESSICA	MALE HAIR	ON SURGICAL	99.96% of North American	1.837 x 10 <sup>603</sup> Times More Likely
TAYLOR	UNDERNEATH	DRAPE		to Come From An Individual with
	TAYLOR	UNDERNEATH	but not <b>REX</b>	the Identical Genetic Profile as
		VICTIM	HEUERMANN	<b>REX HEUERMANN</b>
MAUREEN	FEMALE HAIR	BUCKLE OF		7.9 Trillion Times More Likely to
BRAINARD	ON BARNES	BELT	N/A	Come From An Individual with
BARNES		RESTRAINING		the Identical Genetic Profile as
		LOWER BODY		ASA ELLERUP
MEGAN	[FIRST OF]	OUTSIDE HEAD		2.374 x 1048 Times More Likely to
WATERMAN	TWO FEMALE	AREA	population can be excluded	Come From An Individual with
	HAIRS ON		but not ASA ELLERUP or	the Identical Genetic Profile as
	WATERMAN		VICTORIA HEUERMANN	ASA ELLERUP
MEGAN	[SECOND OF]	TAPE IN THE		2.778 x 10 <sup>480</sup> Times More Likely
WATERMAN	TWO FEMALE	AREA OF THE	N/A	to Come From An Individual with
	HAIRS ON	HEAD		the Identical Genetic Profile as
	WATERMAN			ASA ELLERUP
MEGAN	MALE HAIR	BOTTOM	99.96% of North American	1.408 x 10 <sup>169</sup> Times More Likely
WATERMAN	ON	PORTION OF	1 1	to Come From An Individual with
	WATERMAN	BURLAP	but not <b>REX</b>	the Identical Genetic Profile as
			HEUERMANN	REX HEUERMANN
AMBER	FEMALE HAIR	TAPE IN THE	99.98% of North American	4.654 x 10 <sup>63</sup> Times More Likely to
COSTELLO	ON COSTELLO	AREA OF THE	population can be excluded	Come From An Individual with
		HEAD	but not ASA ELLERUP or	the Identical Genetic Profile as
			VICTORIA HEUERMANN	VICTORIA HEUERMANN

#### <u>Heuermann's Unfettered Access to TARGET RESIDENCE during the</u> <u>disappearance and murder of Ms. Sandra Costilla</u>

As noted *supra*, based on post-arrest interviews with witnesses, the Gilgo Homicide Task Force has learned that WITNESS 3 and Defendant Heuermann began living together at TARGET RESIDENCE in 1991. In September 1993, approximately two months before Ms. Costilla's disappearance and murder, WITNESS 3 moved out of TARGET RESIDENCE. Prior to WITNESS 3 leaving TARGET RESIDENCE, Heuermann's mother had moved out of TARGET RESIDENCE.

Based on the foregoing, neither Heuermann's mother, nor WITNESS 3 were living at TARGET RESIDENCE during the time of Sandra Costilla's murder. Accordingly, the murders of all four charged victims, and now the murders of Ms. Taylor and Ms. Costilla, occurred at times when Defendant Heuermann would have had unfettered time to execute his plans for each victim without any fear that his family or others residing at TARGET RESIDENCE would uncover or learn of his involvement in these crimes.

#### Newly Discovered Digital Evidence

As detailed in *Exhibit A*, following Heuermann's arrest, numerous search warrants were executed at TARGET RESIDENCE, which culminated in, *inter alia*, the seizure of over 350 electronic devices. In the months subsequent to Heuermann's arrest, the Gilgo Homicide Task Force has attempted to extract and analyze data from each of these devices.

An analysis of these devices has revealed Heuermann's significant collection of violent, bondage, and torture pornography, currently dating back to 1994. The pornographic images accessed by Heuermann include, but are not limited to, breast mutilation, vaginal torture, sex substitution (i.e., penetration with an object), the sexualization of decapitated women, bondage, and whipping, which notably and largely coincide with how the remains of Sandra Costilla, Jessica Taylor, and Valerie Mack were discovered.

Moreover, during the analysis of a hard drive recovered from the basement of Heuermann's residence, the Gilgo Homicide Task Force recently discovered a Microsoft Word document entitled "HK2002-04." The document was discovered in "unallocated space." "Allocated space" refers to stored data that a computer is using (files are that viewable and able to be opened by a user). On the other hand, "unallocated space" refers to available or "unstructured" data, which is not readily viewable and able to be opened by a user. Unallocated space frequently contains room for "new data" or "old data" that has been deleted, sent to the "recycle bin," overwritten, etc. For example, when a user deletes data, many users believe the file has been purged forever. However, "deleting" a file only tells the computer that the space previously occupied by that file is now available. The "deleted" data will remain in "unallocated space" until another file is written over it. Data contained within "unallocated space" can be retrieved via a computer forensic extraction method called "file carving."

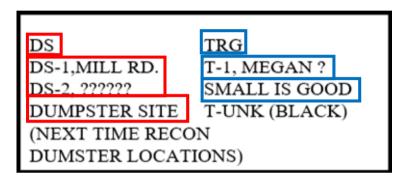
A forensic analysis of the "HK2002-04" document reveals that it was not only a locallycreated draft (i.e., not downloaded from the internet), but also recovered from a hard-drive that indicates it was utilized by Heuermann himself. While the original document appears to have been created in 2000, based on its original title ("HK 2000-03"), this iteration of the Word Document (titled "HK 2002-04") appears to have been created and modified between 2001 and 2002. Based on the foregoing and the facts set forth *infra*, the Task Force members believe "2000" or "2002" to be a reference to calendar years. The Task Force members also believe, based on the foregoing and the facts set forth *infra*, the Microsoft Word document to be a "planning document" utilized by Heuermann to methodically blueprint and "plan out" his "kills" (hereinafter referred to as "HK Planning Document"). *Attached hereto as Exhibit B*. The HK Planning Document begins with a four-category section with the underlined headings of "PROBLEMS," "SUPPLIES," "DS," and "TRG" (see embedded excerpt on the following page):<sup>6</sup>

<u>HK2002-04</u>		
CAT LITTER) -WITNESS -TRACE SOURCE	-SAW / CUTTING TOOLS -HAIR NETS -PHOTO FILM -BURN CAN -FOAM DRAIN CLEANER -BODY WASH/WIPES -TARPS / DROP CLOTHES -MEDICAL GLOVES -BAGS / TAPE -LARGE ELEC CLIPS -RATCHED CARGO STRA	SMALL IS GOOD T-UNK (BLACK) DN

Based on the Gilgo Homicide Task Force's training and experience, the members believe "<u>PROBLEMS</u>" to be a guide on issues to avoid apprehension, "<u>SUPPLIES</u>" to be a reference to what supplies are needed to carry out the serial murders, to avoid apprehension, and to avoid leaving behind DNA evidence. The "<u>DS</u>" heading appears to be an acronym for "dump site," which is corroborated by, *inter alia*, the discoveries of Valerie Mack and Jessica Taylor at two separate "dump sites," i.e., the vicinity of Mill Road and Ocean Parkway. Under that same heading

<sup>&</sup>lt;sup>6</sup> No alterations (other than the addition of call-out boxes where applicable) have been made to excerpts of the HK Planning Document. The document is portrayed in the same manner that it was recovered from in unallocated space, with no changes in formatting or spelling.

is a note regarding "dumpster sites," which the Task Force members believe is a reference to how Heuermann disposed of physical evidence in the manner described *infra* (*see "DISPOSE OF THE FOLLOWING" section below*). "<u>TRG</u>" appears to be a reference to target or victim (see embedded image below). It is important to note that the known victims thus far are all petite women, which is consistent with the "SMALL IS GOOD" entry in the document, lending further support to the aforementioned conclusion that "<u>TRG</u>" refers to victims or "targets."



With regards to the "<u>DS</u>" section of the document, it is important to note that the human remains of Jessica Taylor discovered in 2003, as well as the remains of Valerie Mack discovered in 2000, were dumped in two locations, one of those locations being the vicinity of Mill Road, which is listed as "DS-1, Mill Rd." in the above Word document. On March 29, 2011, Ms. Taylor's torso skull and hands recovered near Ocean Parkway, i.e., a second "dump site." On April 4, 2011, Ms. Mack's skull, hands, and right foot were also recovered near Ocean Parkway, also a second "dump site." The recent discovery of this document prompted the April 2024 cadaver search of the Manorville area, which did not yield the recovery of additional sets of human remains, thereby reinforcing the Task Force members' belief that the HK Planning Document refers to Heuermann's preparations for either Jessica Taylor and/or Valerie Mack.

The HK Planning Document on Heuermann's computer then delves into a three-category section with the headings of "<u>PRE-PREP</u>," "<u>PREP</u>," and "<u>POST-EVENT</u>" (see embedded excerpt below):

PRE-PREP	PREP	POST EVENT
VECH. INSP.	SET-UP STAGE	DISTROY FILE
ENGAGE T-1	HOLDING AREA	CHANGE TIRES
RECON DS-1	BUILD TABLE	BURN GLOVES
LOCATE DS-2	CROSS BAR	DISPOSE OF PIC'S
WEATHER REPORT	HARD POINT	HAVE STORY SET
RECON VID. CAMS.		
RECON PICK-ZONE FOR	VID.CAMS.	

The Gilgo Homicide Task Force members believe "<u>PRE-PREP</u>" to be a guide on steps to take in advance of a homicide, i.e., inspecting his vehicle, engaging the target, conducting a "RECON"<sup>7</sup> or survey of video surveillance cameras in pertinent areas including the "PICK-ZONE" (i.e., location where a victim is picked-up), and checking the weather to ensure for optimal conditions. "<u>PREP</u>," on the other hand, appears to be a reference to steps taken closer in-time to homicide, i.e., setting up the "staging area," "holding area," and "table/cross bar/hard point" for the victim.

Specifically, the "<u>PREP</u>" section has five entries: "SET-UP STAGE," "HOLDING AREA," "BUILD TABLE," "CROSS BAR," and "HARD POINT." The Gilgo Homicide Task Force members are aware that a "CROSS BAR" is often placed underneath tables to provide further structural support for heavier objects being placed on a table. Additionally, the Task Force members are also aware that a "HARD POINT" refers, in the field of sexual "suspension bondage,"

<sup>&</sup>lt;sup>7</sup> "Recon" is commonly utilized as a shorthand for the word reconnaissance, which means to survey or research a specific area in order to ascertain particular strategic features.

to a fixed attachment point in the ceiling that supports the weight of an individual being suspended off of the ground, which is corroborated by Heuermann's significant interest in pornography where the subject is either suspended, tortured, bound to a table, decapitated, and/or their breasts are mutilated, which is consistent with the foregoing notations regarding suspension, as well as the condition of the victims described herein.

Additionally, "<u>POST EVENT</u>" appears to reference a checklist of tasks following the "event" or homicide to avoid apprehension, i.e., "DISTROY [*sic*] FILE," "CHANGE TIRES," "BURN GLOVES," "DISPOSE OF PICS" taken of the victim, and "HAVE STORY SET" (e.g., alibi, story for family upon their return, or law enforcement, should an inquiry be made).

The HK Planning Document continues to further expound on preparatory measures such as specific "RECON" steps taken (*see "RECON REPORTS" and "TAKEDOWN/PICKUP" sections embedded below*), "packaging [a body] for transport" (*see "BODY PREP" section embedded below*), and steps to inhibit victim identification and avoid leaving behind DNA evidence (*see "BODY PREP" and "DISPOSE OF THE FOLLOWING" sections embedded below*):

#### RECON REPORTS:

- 1. VID. CAMS. ON LIE RT 112 TO RT 110 = 33 (OLD)
- 2. VID. CAMS. ON SS PKWY RT 231 TO EXIT 30 = 10 (OLD)
- 3. T-1 INFO CELL# 917-294-4402 BEEP/VOICE MAIL 917-898-9854 (OLD)

#### TAKE DOWN/PICK UP:

- HUNT TOO LONG SEEN IN AREA TOO LONG.
- REMEMBER DON'T CHARGE GAS.
- RECON FOR VID.CAMS. IN PICK UP AREA NEXT TIME.

BODY PREP:

- WASH BODY INSIDE AND ALL CAVITIES
- REMOVE TRACE EVENDICE [FINGER PRINTS/HAIR]
- REMOVE TRACE DNA
- REMOVE ID MARKS [TATOOS, MARKS.....]
- REMOVE MARKS FROM TOURTURE
- REMOVE HEAD AND HANDS
- PACKAGE FOR TRANSPORT

DISPOSE OF THE FOLLOWING:

- TOOLS AND DEVICES
- T-1 CLOTHES AND PERSONAL ITEMS
- DROP CLOTHES
- WIPES AND TOWELS
- PROPS, TOYS, WOOD ITEMS......
- ANYTHING THAT TOUCHED T-1
- WHAT YOU WORE
- DISTROY BOOK AND COMPUTER FILES.
- BURN GLOVES
- DISPOSE OF BOX OF PLATIC BAS TO AVOID TRACE.

The "BODY PREP" section above includes a note to "REMOVE HEAD AND HANDS," which clearly relates to the condition of Jessica Taylor's and Valerie Mack's remains, as both victims were decapitated and dismembered at their arms below their elbows. Additionally, each of these victim's remains, as well as the remains of the "Gilgo Four" were indeed "packaged for transport," as this section indicates to do, further increasing the significance of this document's presence on Heuermann's laptop computer. Finally, this section also includes a note to "REMOVE ID MARKS [TATOOS][*sic*]." As noted *supra*, the examination of Ms. Taylor's body in July 2003 indicated numerous sharp "linear injuries" to the victim's skin, specifically around where Ms. Taylor's tattoo had been located, which investigators believe was intended to inhibit the

identification of Ms. Taylor's tattoo and therefore, Ms. Taylor, in a manner consistent with the HK Planning Document.

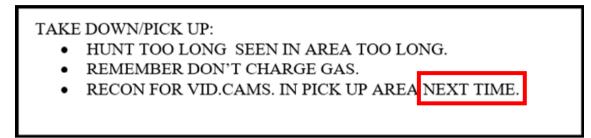
Furthermore, the "DISPOSE OF THE FOLLOWING" section lists "DISTROY [*sic*] COMPUTER FILES" as a check-list item. The presence of this HK Planning Document in "unallocated space" demonstrates Heuermann's efforts to destroy or delete computer files in a manner that is consistent with this notation. As set forth in *Exhibit A*, a consistent theme of Heuermann's computer activity is the use of forensic wiping software, *inter alia*, in a manner that is consistent with this notation in the HK Planning Document.

In the "THINGS TO REMEMBER" section, there are notes indicating steps to take "next time," i.e., considering a hit to the face or neck "NEXT TIME," or using heavier rope for the neck as the "LIGHT ROPE BROKE UNDER STRESS OF BEING TIGHTEND [*sic*]" (see embedded image below). Heuermann further opines on the importance of sleep to not only avoid "PROBLEMS" but also to increase what Heuermann refers to as "PLAY TIME."

#### THINGS: TO REMEMBER

- SOUND TRAVELS (IE: BIRD OUTSIDE) CONTROL THE AMOUNT OF AIR IN AND OUT TO CONTROL THE NOISE MADE.
- GET SLEEP BEFORE HUNT TOO TIRED CREATS PROBLEMS
- HIT HARDER TOO MANY HIT TO TAKE DOWN. CONSIDER A HIT TO THE FACE OR NECK NEXT TIME FOR TAKE DOWN.
- MORE SLEEP & NOISE CONTROL = MORE PLAY TIME
- USE PUSH PINS TO HANG DROP CLOTHES FROM CEILING NOT TAPE.
- USE HEVEY ROPE FOR NECK-LIGHT ROPE BROKE UNDER STRESS OF BEING TIGHTEND.

As set forth above, and embedded here below, the Gilgo Homicide Task Force members believe these references to "next time" indicate Heuermann's prior experiences and what changes to implement moving forward.



Moreover, the references in the THINGS TO REMEMBER" section to utilize "PUSH PINS TO HANG DROP CLOTHES [*sic*] FROM CEILING" and "NOT TAPE," as well as manifested concerns regarding "SOUND TRAVEL" indicate the referenced incidents would have occurred indoors, and likely inside of TARGET RESIDENCE, which is a "controlled environment" that Heuermann would not only be familiar with but also an area where Heuermann would have access to said tools and supplies. Drop cloths would also serve the twin purposes of limiting the spread of forensic evidence, such as blood, to a confined area, as well as controlling sound travel, which would lead to more "PLAY TIME," which is believed to be a reference to sexual and mutilation acts perpetrated on victims. Additionally, with Heuermann's family vacationing out of state, Defendant would have had unfettered time and exclusive access to the TARGET RESIDENCE, allowing Defendant Heuermann ample opportunity to execute, and clean up after, these crimes. Finally, the HK Planning Document on Heuermann's laptop computer includes a "NOTES" section (see embedded image below):

#### NOTES:

- SPUR OF THE MOMENT COVER? STOCKHOLM SYNDROME
- THE MORE YOU DO THE MORE CLUES YOU GIVE
- LOOK AT THE "PAINTING" WHAT-WHY-WHO
- ORIGINANIZED VS. DISORIGINANIZED
- PG 162- SEX SUBTITUTION, PG 163, PG 175 MUILTITION = DISORIGINANIZEDED

The investigation to date has established the source of these notes, i.e., the <u>Mind Hunter</u> paperback book authored by John Douglas,<sup>8</sup> specifically the First Edition published in 1996, concerning the criminal profiling of serial killers.

For example, the "NOTES" section of the HK Planning Document includes the following notation:

## • PG 162- SEX SUBTITUTION, PG 163,

Page 162 of said book does indeed reference sex substitution (i.e., penetration with an object) as Douglas describes the "rather horrible sexual mutilation and masturbation over [the victim's] body, but no intercourse. The penetration with the umbrella and pen were acts of sexual substitution."

On page 163, Douglas opines that the perpetrator of such a crime, i.e., sex substitution, would be a "disorganized" killer who would be "compulsive" and perhaps "living with his parents." Accordingly, this notation contained in the HK Planning Document is consistent with

<sup>&</sup>lt;sup>8</sup> John Douglas is a retired special agent and profiler from the FBI, who spent over 25 years in the FBI's Behavioral Analysis Unit. During his time with the FBI, Douglas interviewed over a dozen serial killers and other violent sexual offenders, which led to numerous publications, including the "Mind Hunter" book.

the aforementioned book in page number and subject matter.

The "NOTES" section of the HK Planning Document also includes the following notation:

## PG 175 MUILTITION = DISORIGINANIZEDED

In page 175 of the first-edition "Mind Hunter" book, Douglas describes a woman's screams and shortly thereafter how the woman's throat had been cut and her naked body mutilated. Douglas further asserts, on page 175 of said book, that mutilation is a sign of "disorganized personality type." Accordingly, this notation contained in the HK Planning Document is again consistent with the aforementioned book in page number and subject matter.

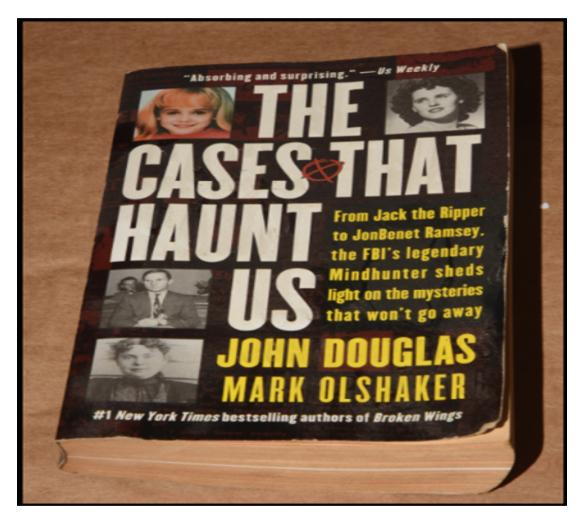
The "NOTES" section of the HK Planning Document also contains the following notation:

## • LOOK AT THE "PAINTING" WHAT-WHY-WHO

On page 19 of said book, Douglas notes that while he was still at the FBI, he always advised his agents, "[i]f you want to understand the artist (the perpetrator), you have to look at the painting (the victim). We've looked at many 'paintings' over the years and talked extensively to the most 'accomplished' 'artists.'" Accordingly, the note above, contained in Heuermann's laptop computer, to "look at the painting," yet again points to the aforementioned book as the source of Heuermann's commentary. Finally, the other notations contained in the HK Planning Document, i.e., "SPUR OF THE MOMENT," "COVER," "STOCKHOLM SYNDROME,"<sup>9</sup> "THE MORE YOU DO THE MORE CLUES YOU GIVE" are also each contained in the said book, all pointing to it as the source of Heuermann's notations.

<sup>&</sup>lt;sup>9</sup> Stockholm Syndrome is a psychological condition that explains why victims or hostages can sometimes develop a psychological bond or empathy for their captor or abuser.

The foregoing is corroborated, in part, by Heuermann's possession of other serial killer books authored by John Douglas. During the initial search warrant execution in July 2023 at TARGET RESIDENCE, the Task Force observed that Heuermann possessed, in his home office, the book entitled "The Cases That Haunt Us" (see embedded image below), which outlines the facts, evidence, and victimology of several notable serial murder cases.



The Gilgo Homicide Task Force members believe that the totality of circumstances surrounding the HK Planning Document, including Heuermann's attempt to delete its existence, points to it as Heuermann's self-education and "homework" on the topic of carrying out serial, sexual murder. Heuermann's pointed concerns regarding (1) avoiding being captured on video surveillance; (2) leaving behind forensic evidence; (3) what supplies to purchase; (4) how to package a body for subsequent transportation to "DUMP SITES," e.g., "wash body inside and all cavities" prior to "package for transport;" (5) avoiding a "paper trail" tying him to crimes and/or crime scenes (e.g., "REMEMBER DON'T CHARGE GAS"); (6) concerns regarding noise and/or air travel, which could inhibit "play time;" and (7) how to "improve" "next time" further confirm, merely by looking within the four corners of the document itself, its relevance in this regard. This belief is further corroborated when looking at a litany of external factors, including, *inter alia*, how the six (6) victims now attributable to Heuermann were indeed "packaged" and "transported," and in the case of Ms. Taylor, how her head, hands, and tattoo were removed and/or obliterated, consistent with the document's instructions. Furthermore, an analysis of Heuermann's computers confirms the HK Planning document was in "unallocated space" and had hence been deleted, which is consistent with not only the "DISTROY [sic] COMPUTER FILES" notation, but also Heuermann's established use of forensic wiping software.

#### 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, and Defendant's indictment on these additional charges, which now incorporate a fifth and sixth 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: June 6, 2024 Suffolk County, New York

> RAYMOND A. TIERNEY DISTRICT ATTORNEY

Andrew Lee By:

Assistant District Attorney



(Previously filed, available upon request)

# **EXHIBIT B**

#### HK2002-04

PROBLEMS	<u>SUPPLIES</u>	<u>DS</u>	<u>TRG</u>
-DNA	-BOOTIES	DS-1,MILL RD.	T-1, MEGAN ?
-TIRE MARKS	-LIE / ACID	DS-2, ??????	SMALL IS GOOD
-BLOOD STAINS	-POLICE SCANER	DUMPSTER SITE	T-UNK (BLACK)
-FINGER PRINTS	-ROPE / CORD	(NEXT TIME RECO	DN
-M/O(PLASTIC BAG/	-SAW / CUTTING TOOLS	DUMSTER LOCAT	IONS)
CAT LITTER)	-HAIR NETS		
-WITNESS	-PHOTO FILM		
-TRACE SOURCE	-BURN CAN		
OF SUPPLIES	-FOAM DRAIN CLEANER		
-FOOT/SHOE PRINTS	-BODY WASH/WIPES		
-PHOTOS?	-TARPS / DROP CLOTHES		
-MISS-LEADERS?	-MEDICAL GLOVES		
-POLICE STOP	-BAGS / TAPE		
-TRUCK STUCK	-LARGE ELEC CLIPS		
-FINGER PRINTS	-RATCHED CARGO STRA	.P	
IN GLOVES			
-PLATIC BAGS MATCHE	D		
TO BOX			
-HAIR & FIBER			

PRE-PREP	PREP	POST EVENT			
VECH. INSP.	SET-UP STAGE	DISTROY FILE			
ENGAGE T-1	HOLDING AREA	CHANGE TIRES			
RECON DS-1	<b>BUILD TABLE</b>	<b>BURN GLOVES</b>			
LOCATE DS-2	CROSS BAR	DISPOSE OF PIC'S			
WEATHER REPORT	HARD POINT	HAVE STORY SET			
RECON VID. CAMS.					
RECON PICK-ZONE FOR VID.CAMS.					

NOTES:

- SPUR OF THE MOMENT COVER? STOCKHOLM SYNDROME
- THE MORE YOU DO THE MORE CLUES YOU GIVE
- LOOK AT THE "PAINTING" WHAT-WHY-WHO
- ORIGINANIZED VS. DISORIGINANIZED
- PG 162- SEX SUBTITUTION, PG 163, PG 175 MUILTITION = DISORIGINANIZEDED

#### **RECON REPORTS:**

- 1. VID. CAMS. ON LIE RT 112 TO RT 110 = 33 (OLD)
- 2. VID. CAMS. ON SS PKWY RT 231 TO EXIT 30 = 10 (OLD)
- 3. T-1 INFO CELL# 917-294-4402 BEEP/VOICE MAIL 917-898-9854 (OLD)

- WASH BODY INSIDE AND ALL CAVITIES
- REMOVE TRACE EVENDICE [FINGER PRINTS/HAIR]
- REMOVE TRACE DNA
- REMOVE ID MARKS [TATOOS, MARKS.....]
- REMOVE MARKS FROM TOURTURE
- REMOVE HEAD AND HANDS
- PACKAGE FOR TRANSPORT

DISPOSE OF THE FOLLOWING:

- TOOLS AND DEVICES
- T-1 CLOTHES AND PERSONAL ITEMS
- DROP CLOTHES
- WIPES AND TOWELS
- PROPS, TOYS, WOOD ITEMS......
- ANYTHING THAT TOUCHED T-1
- WHAT YOU WORE
- DISTROY BOOK AND COMPUTER FILES.
- BURN GLOVES
- DISPOSE OF BOX OF PLATIC BAS TO AVOID TRACE.

THINGS: TO REMEMBER

- SOUND TRAVELS (IE: BIRD OUTSIDE) CONTROL THE AMOUNT OF AIR IN AND OUT TO CONTROL THE NOISE MADE.
- GET SLEEP BEFORE HUNT TOO TIRED CREATS PROBLEMS
- HIT HARDER TOO MANY HIT TO TAKE DOWN. CONSIDER A HIT TO THE FACE OR NECK NEXT TIME FOR TAKE DOWN.
- MORE SLEEP & NOISE CONTROL = MORE PLAY TIME
- USE PUSH PINS TO HANG DROP CLOTHES FROM CEILING NOT TAPE.
- USE HEVEY ROPE FOR NECK-LIGHT ROPE BROKE UNDER STRESS OF BEING TIGHTEND.

TAKE DOWN/PICK UP:

- HUNT TOO LONG SEEN IN AREA TOO LONG.
- REMEMBER DON'T CHARGE GAS.
- RECON FOR VID.CAMS. IN PICK UP AREA NEXT TIME.