

SUPREME 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. 73544-24

(Mazzei, J.)

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.

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.

On June 6, 2024, Defendant Rex A. Heuermann was once again charged by the Grand Jury in a Superseding Indictment, Suffolk County Indictment # 71635-24, which incorporated 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.

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 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 Valerie Mack on or about or between September 1, 2000 to November 19, 2000.

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 arraignments on the Superseding Indictments, which occurred on January 16, 2024 and June 6, 2024, respectively. 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 murder of an additional victim, Valerie Mack.

Based on Defendant Heuermann's indictment on an additional murder charge as it pertains to now a seventh 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 extended period of time that this Defendant was able to avoid apprehension, the length of incarceration the Defendant faces upon conviction, 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 2000 and 2011 Discovery of the Human Remains of Valerie Mack

On or about November 19, 2000, three individuals, whose identities are known to law enforcement were hunting with a dog in a wooded area of Manorville (hereinafter “HUNTERS”). At approximately 10:50 a.m., while hunting at that above location together, the HUNTERS’ dog alerted the group to a black plastic bag, which was wrapped with duct tape. Said bag was located approximately one mile west of Halsey Manor Road and north of Mill Road¹ (see embedded map below – as denoted by the red placemark under the numbers 00-629549, which is the unique Central Complaint number assigned to this investigation).



¹ On or about July 26, 2003, Jessica Taylor’s partial remains were found in an area just west of Halsey Manor Road. Ms. Taylor had been decapitated and her arms had been severed from her body below her elbows. Ms. Taylor’s remains were located approximately a half mile from where Valerie Mack’s body was recovered (see image above – as denoted by the red placemark under the numbers 03-422775, which is the unique Central Complaint number assigned to that matter).

Inside said bag, the HUNTERS observed additional black plastic bags and ultimately, a set of human remains. The HUNTERS' discovery prompted them to call 911. Upon arrival, members of the Suffolk County Police Department (hereinafter "SCPD") observed the remains of a female, later identified as Valerie Mack. Notably, the victim was decapitated. Moreover, both of her hands had been severed from her body, above the wrists, and the victim's right leg had also been cut off from her body at the mid-calf. Ms. Mack's torso, legs, and arms were also bound with rope. During the initial investigation in Manorville in 2000, Ms. Mack's head, hands, and right foot were not found at the scene and their location remained unknown to law enforcement for approximately eleven years.

On April 4, 2011, as part of the expanded search of the Gilgo Beach area, Valerie Mack's skull, hands, and right foot were discovered along Ocean Parkway, just east of Gilgo Beach, Suffolk County, NY. Ms. Mack's remains were discovered less than 1.5 miles east from where Jessica Taylor's skull, hands, and forearm were discovered (see embedded image on the following page). Notably, each of the five previously discovered victim remains on Gilgo Beach,² as well as the skull, hands, and right foot of Ms. Mack, were recovered on the same side of the road and at a similar depth of within 50 feet from the edge of the parkway.

HEREINAFTER, SPACES LEFT INTENTIONALLY BLANK

² The five prior victims discovered on Gilgo Beach include Maureen Brainard-Barnes, Melissa Barthelemy, Megan Waterman, and Amber Costello (hereinafter the "Gilgo Four"), as well as Jessica Taylor.



During the initial investigation, as Ms. Mack’s identity remained unknown to law enforcement, the victim had been referred to as “Jane Doe # 6.” However, utilizing a DNA sample developed from Ms. Mack’s remains, on or about May 28, 2020, local law enforcement, working with a genetic genealogist from the Federal Bureau of Investigation, as well as the Suffolk County Crime Laboratory (hereinafter “SCCL”), and outside laboratories, were able to determine the identity of Jane Doe # 6 as Valerie Mack.

Information Relevant to the Disappearance of Valerie Mack

Valerie Mack was born on June 2, 1976, in Atlantic City, NJ. Her birth name was Valerie Lyn Fulton. At an early age, Ms. Mack was placed in foster care and shuffled between several foster homes until she was ultimately adopted by the Mack family. In 1994, at the age of 17, Ms. Mack gave birth to a son and began living with her son’s father in Wildwood, NJ. Shortly thereafter, she

began frequently traveling to and from Wildwood, NJ to Philadelphia, PA.

In 1996, Valerie had her first contact with Pennsylvania law enforcement, resulting in the first of several prostitution-related arrests by the Philadelphia Police Department. Ms. Mack's final arrest came on or about June 25, 2000. Based on the foregoing and the investigation to date, between 1996 and 2000, Ms. Mack is believed to have been working as a sex worker primarily in the Philadelphia, PA and Atlantic City, NJ areas. While she did advertise online, primarily under the alias of "Melissa Taylor," Ms. Mack was also known to "street walk," i.e., wander the streets looking for sex work.

Shortly after the discovery of her remains in Manorville, Ms. Mack's body was examined by forensic pathologists with the Suffolk County Medical Examiner's Office, as well as forensic anthropologists, who were able to determine the victim had been deceased for approximately two-to-eight weeks. Recently, the Suffolk County Medical Examiner's Office conducted an independent review of these findings and determined that Ms. Mack's death would have occurred, more specifically, on or about and between September 1, 2000, to November 19, 2000. At the time of her death, Ms. Mack would have been 24 years old.

The Examination of the Remains of Valerie Mack

In addition to the aforementioned decapitation and dismemberment of Ms. Mack's head and hands, respectively, the Medical Examiner's Office was also able to determine that Ms. Mack's lower right leg had been amputated at the mid-calf. Moreover, the examination revealed injuries to the victim's left mid and lateral breast in the form of "two contiguous ragged defects," which were likely the result of post-mortem mutilation of the victim's breast with a sharp object.

Ms. Mack's remains were also examined by Forensic Scientists with the SCCL. During the examination of Ms. Mack's body, several human hairs were recovered, one of which was found in the vicinity of the decedent's left wrist (hereinafter "Female Hair on Mack"). A subsequent

examination of the Female Hair on Mack led to the determination that it was a human head hair with Caucasian characteristics; however, it was, based on the DNA testing capabilities at the SCCL, unsuitable for further DNA testing at that time.

On or about March 29, 2024, the Gilgo Homicide Task Force brought a cutting of the Female Hair on Mack to an outside forensics laboratory (previously referred to in *Exhibit A* as “Forensic Laboratory # 2”), which specializes in forensic mitochondrial analysis. On or about October 14, 2024, Forensic Laboratory # 2 issued a report concluding that the partial mitochondrial DNA profile developed from the Female Hair on Mack and the known mitochondrial DNA profiles of Asa Ellerup and Victoria Heuermann, “share a common base at all locations...,” specifically at a rate that would, as per the EMPOP database,³ exclude 99.65% of the North American population as the contributor of said hair recovered near the dismembered left wrist of the victim. While 99.65% of the North American population can be excluded as the contributor of the Female Hair on Mack, Defendant Heuermann’s wife and daughter, who share a mitochondrial DNA profile,⁴ cannot be excluded as the contributor of the said hair recovered from the remains of Valerie Mack.

On or about October 29, 2024, the Gilgo Homicide Task Force sent a cutting of the Female Hair on Mack to an outside, 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 November 26, 2024,

³ 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.

⁴ 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. As set forth below, 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 Mack.

Forensic Laboratory # 1 issued a report indicating it had developed a nuclear DNA profile for the Female Hair on Mack. 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 Mack) to Victoria Heuermann's SNP Genotype File (developed from her buccal swab), which resulted in the conclusion that the DNA profile generated from the Female Hair on Mack is 1.31×10^{356} times more likely to have come from a person genetically identical to Victoria Heuermann's SNP Genotype File than from an unrelated individual.⁵

Based on the foregoing, it is significant that two forensic laboratories have now independently determined that the aforementioned hair, which was inside the sealed black garbage bags containing Ms. Mack's remains, specifically near the victim's dismembered left wrist, is substantially more likely to have derived from a person genetically identical to Victoria Heuermann's DNA profile, thereby linking evidence from yet another crime scene to the Defendant through his immediate family. Notably, at the time of Ms. Mack's disappearance and murder, Defendant Heuermann's daughter would have been between three and four years old.

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

⁵ Forensic Laboratory # 1 developed three separate DNA "libraries" from the Female Hair on Mack. For the purposes of this application, the most conservative statistic is provided. Furthermore, the 1.31×10^{356} statistic, and the following statistical probabilities, are provided in scientific notation. The standard notation for 1.31×10^{356} is 1,310 with 353 zeros thereafter.

VICTIM	DESIGNATION IN BAIL LETTER	APPROX. LOCATION OF HAIR RECOVERY	MITOCHONDRIAL DNA RESULTS	NUCLEAR (SNP) DNA RESULTS
SANDRA COSTILLA	MALE HAIR ON COSTILLA	TAPE-LIFT OF STRIPED SHIRT ABOVE VICTIM'S HEAD	99.96% of North American population can be excluded but not REX HEUERMANN	4.347 x 10 ³³² Times More Likely to Come From An Individual with the Identical Genetic Profile as REX HEUERMANN
SANDRA COSTILLA	FEMALE HAIR ON COSTILLA	VICTIM'S RIGHT ARM	99.98% of North American population can be excluded but not WITNESS 3	4.578 x 10 ¹⁰⁴⁰ Times More Likely to Come From An Individual with the Identical Genetic Profile as WITNESS 3
VALERIE MACK	FEMALE HAIR ON MACK	INSIDE GARBAGE BAGS CONTAINING VICTIM, NEAR VICTIM'S LEFT WRIST	99.65% of the North American population can be excluded but not ASA ELLERUP or VICTORIA HEUERMANN	1.31 x 10 ³⁵⁶ Times More Likely to Come From An Individual with the Identical Genetic Profile as VICTORIA HEUERMANN⁶
JESSICA TAYLOR	MALE HAIR UNDERNEATH TAYLOR	ON SURGICAL DRAPE UNDERNEATH VICTIM	99.96% of North American population can be excluded but not REX HEUERMANN	1.837 x 10 ⁶⁰³ Times More Likely to Come From An Individual with the Identical Genetic Profile as REX HEUERMANN
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

⁶ See Footnote 5.

Digital Evidence as it Relates to the Disappearance and Murder of Valerie Mack.

As detailed in *Exhibit A*, following his arrest, numerous search warrants were executed at Rex Heuermann's 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. As previously detailed, an analysis of these devices has revealed Heuermann's significant collection of violent, bondage, and torture pornography, currently dating back to 1994.

Moreover, in the months leading up to Ms. Mack's disappearance and murder, the Task Force uncovered pornographic images accessed by Heuermann which include, breast mutilation, and the tying up of women with rope, which largely coincide with a.) the injuries inflicted on Ms. Mack's breast and b.) how the rope ligatures were utilized on Valerie Mack. More specifically, during the month of September 2000, investigators observed a large uptick in downloads of pornographic images depicting Bondage, Discipline, Sadism, and Masochism ("BDSM"). These pornographic downloads were discovered on a compact disc located in Heuermann's home office.

Specifically relevant to the Mack investigation is, on May 23, 2020, and July 30, 2020, Rex A. Heuermann's home IP Address was used to access Gilgonews.com, a website previously maintained by the SCPD to disseminate information regarding the Gilgo Beach investigation. Notably, on May 23, 2020, at approximately 11:30 p.m., at the time Rex Heuermann's home IP address visited Gilgonews.com, the web page highlighted the upcoming identification of "Manorville Jane Doe," who would, five days later, be identified as Valerie Mack.

On July 30, 2020, at approximately 10:50 p.m., Heuermann's home IP address once again visited the Mack-specific portions of the Gilgonews.com website for information pertaining to the investigation.

As previously noted, in March 2024, the Gilgo Homicide Task Force extracted a Microsoft Word Document, entitled “HK2002-04,” from Heuermann’s laptop computer. As set forth in further detail in *Exhibit A*, specifically the June 6, 2024 bail application, the Task Force members believe 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 Gilgo Homicide Task Force subsequently hired a digital forensics expert who was able to determine that while this iteration (*Exhibit B*) of the HK Planning Document appeared to have been created and modified between 2001 and 2002, the original document appears to have been created in the year 2000, which notably coincides with the year Valerie Mack was murdered.

In addition to the document’s creation in the same year that Valerie Mack was murdered, the HK Planning Document substantively relates to the Mack investigation in other respects. First, the HK Planning Document begins with a four-category section with the underlined headings of “PROBLEMS,” “SUPPLIES,” “DS,” and “TRG” (see embedded excerpt below, emphasis added, which is described in further detail below):

<u>HK2002-04</u>			
<u>PROBLEMS</u>	<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 SCANNER	DUMPSTER SITE	T-UNK (BLACK)
-FINGER PRINTS	ROPE / CORD	(NEXT TIME RECON	
-M/O (PLASTIC BAG/ CAT LITTER)	SAW / CUTTING TOOLS	DUMSTER LOCATIONS)	
-WITNESS	-HAIR NETS		
-TRACE SOURCE	-PHOTO FILM		
OF SUPPLIES	-BURN CAN		
-FOOT/SHOE PRINTS	FOAM DRAIN CLEANER		
-PHOTOS?	-BODY WASH/WIPES		
-MISS-LEADERS?	-TARPS / DROP CLOTHES		
-POLICE STOP	-MEDICAL GLOVES		
-TRUCK STUCK	-BAGS / TAPE		
-FINGER PRINTS	-LARGE ELEC CLIPS		
IN GLOVES	-RATCHED CARGO STRAP		
-PLATIC BAGS MATCHED TO BOX			
-HAIR & FIBER			

Based on the Gilgo Homicide Task Force's training and experience, it is believed the "DS" heading (see red boxes above) appears to be an acronym for "dump site," which is corroborated by, *inter alia*, the discovery of Valerie Mack at two separate "dump sites," one of those locations being the vicinity of Mill Road, which is listed as "DS-1, Mill Rd." in the above Word document. On April 4, 2011, Ms. Mack's skeletonized skull, hands, and right foot were recovered near Ocean Parkway, i.e., a second "dump site." As detailed previously, "TRG" appears to be a reference to target or victim (see blue boxes above). It is important to note that, at the time of Ms. Mack's disappearance and murder, she was approximately 5'0" tall and weighed less than 110 pounds, fitting the "SMALL IS GOOD" note in the HK Planning Document regarding the type of victims targeted by the Defendant.

Based on the Gilgo Homicide Task Force's training and experience, the members believe "SUPPLIES" to be a reference to what supplies are needed to carry out the serial murders. One of the listed supplies is "Foam Drain Cleaner" (see orange boxes above). Notably, a review of Heuermann's Nextel cellular phone records reveals that on October 3, 2000, Heuermann appears to make two outgoing calls to a plumbing company based in Lynbrook, whose identity is known to law enforcement. Furthermore, in mid-November 2000, Heuermann paid \$265.83 to yet another plumbing company to check his "mainline" drain.

The "SUPPLIES" section also includes notes to utilize "ROPE/CORD" and "BAGS/TAPE," each of which were recovered with the remains of the victim. During the course of this investigation, well before the identification of Rex A. Heuermann as a suspect in the murders of Valerie Mack and Jessica Taylor, a Forensic Scientist with the SCCL compared the garbage bags containing the 2011 remains of Valerie Mack to the garbage bags containing the 2011 remains of Jessica Taylor. At the conclusion of this examination, the SCCL was able to

determine noticeable similarities in the bags based on, *inter alia*, material, color, seal location, knots, perforations, size,⁷ and type of closure, thereby connecting the Mack and Taylor cases not only by location (Manorville and Gilgo Beach “dump sites”), victimology (petite sex workers) and *modus operandi* (decapitation, dismemberment, and “dump” of identifiable body parts, e.g., skull and hands near Gilgo Beach, while the other portions of the victims were “dumped” in Manorville), but also via supplies, i.e., similar garbage bags utilized in both crimes.

Similarly, well before the identification of Rex A. Heuermann as a suspect in the murders of Valerie Mack and Jessica Taylor, a Forensic Anthropologist with the New York City Office of Chief Medical Examiner’s Office (“OCME”) noted similarities in the type of cutting instrument used to dismember both victims. Specifically, the Forensic Anthropologist analyzed the cut bones of both victims, which led to the conclusion that a hand-powered saw, with similar blade widths, were utilized in the dismemberments of both Jessica Taylor and Valerie Mack. This is significant in that it is yet another link not only between the two victims, but also to the HK Planning Document, namely a similar “supply,” i.e., “SAW / CUTTING TOOLS,” used in both crimes.

As noted above, the HK Planning Document contains a “BODY PREP” section (reproduced on the following page) with a note to “REMOVE HEAD AND HANDS,” which clearly relates to the condition of Valerie Mack’s remains. Additionally, Valerie Mack was indeed “packaged for transport,” as this section indicates to do, further increasing the significance of this document’s presence on Heuermann’s laptop computer.

⁷ Of the four garbage bags recovered in the 2011 recovery sites of Jessica Taylor and Valerie Mack (2 for each victim), three of the four bags were 40” x 32.” Only the outer plastic bag containing Jessica Taylor’s remains was 48” x 32.” Despite this difference, the outer plastic bag were similar the other three 40” x 32” garbage bags with respect to material, color, knot, perforations, seal location and type of closure.

BODY PREP:

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

Finally, the “BODY PREP” section above includes a note to “REMOVE ID MARKS [TATOOS][sic].” Recently, the Gilgo Homicide Task Force interviewed several witnesses, who confirmed Valerie Mack had a tattoo on her foot/ankle, which depicted her son’s name. The examination of the victim’s body in 2000 revealed no tattoos on the victim’s left foot/ankle. Accordingly, the Gilgo Homicide Task Force members believe Ms. Mack’s tattoo, of her son’s name, was on her right foot/ankle. That inference is corroborated, not only by the foregoing examination and witness statements, but also by the notations on Heuermann’s laptop computer, specifically the HK Planning Document, which call for the removal of any “ID MARKS,” including “TATOOS” (sic), prior to packaging the body for transportation. Furthermore, Rex A. Heuermann is charged with the murder of Jessica Taylor, whereupon the People allege the Defendant engaged in similar postmortem behavior in the form of sharp-force mutilation to Ms. Taylor’s tattoo so as to prevent and obfuscate her identification via tattoo. Based on the foregoing, the Gilgo Homicide Task Force members believe the Defendant amputated Ms. Mack’s lower right leg at the mid-calf to inhibit and/or delay the identification of Ms. Mack’s tattoo and therefore, Ms. Mack.

Physical Evidence Recovered Via Search Warrant from Rex Heuermann’s Home and Office.

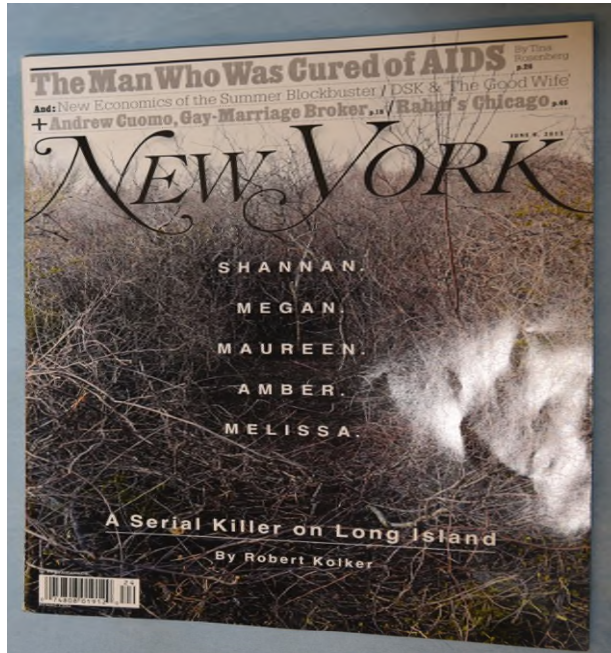
In July 2023, law enforcement executed search warrants on, *inter alia*, Rex A. Heuermann’s home and Manhattan office. On or about July 15, 2023, while executing the court-

authorized search warrant in Manhattan, agents of the Gilgo Homicide Task Force observed a magazine in Rex A. Heuermann's personal office, specifically a People Magazine, which had been issued on November 7, 2016.

The magazine, entitled 'BODIES ON THE BEACH: HUNT FOR THE LONG ISLAND SERIAL KILLER: Who is the cold-blooded murderer killing women and dumping their bodies on a New York Beach?' was recovered from a cardboard box directly in front of Rex A. Heuermann's work desk (see embedded images below):



Additionally, on or about July 16, 2023, while executing a search warrant, agents of the Gilgo Homicide Task Force observed another magazine, this time located in the basement vault of Rex A. Heuermann's residence. The 'New York' magazine, which had been issued on June 6, 2011, featured a cover story regarding 'A Serial Killer on Long Island' (see embedded images below):



Between May 20-25, 2024, law enforcement executed a second search warrant on the Defendant's Massapequa Park residence. Notably, on May 21, 2024, agents of the Gilgo Homicide Task Force seized newspapers from Rex A. Heuermann's primary bedroom, which included a New York Post newspaper that had been issued on July 29, 2003. Said newspaper included an article entitled "Serial Killer Eyed in L.I. Slay," which contained details surrounding the disappearance and murders of Valerie Mack and Jessica Taylor (see embedded images below):



Finally, on May 21, 2024, agents of the Gilgo Homicide Task Force also seized newspapers from the basement of Heuermann’s residence, which included a Newsday publication issued on November 22, 1993. Said newspaper included an article entitled “Body Discovered in Woods,” which specifically referenced the homicide investigation of Sandra Costilla, whose “partially clothed body was discovered in a wooded area of North Sea [Southampton] on Saturday [November 20, 1993]” (see embedded images below):



The Gilgo Homicide Task Force members believe these newspapers and magazines were store-bought as they lack any indication of postmarks or subscription-tags. Based on the totality of the investigation, the Task Force believes Rex A. Heuermann sought, purchased, and kept these publications as, *inter alia*, “souvenirs” or “mementos” of his crimes, serving as a reminder of the events that occurred throughout the murders of each victim.

Based on the foregoing, Rex A. Heuermann is now charged with the murders of seven victims. Of note, two independent laboratories have forensically linked evidence from six of seven crime scenes to Defendant Heuermann and/or members of his immediate family, or individuals with whom Heuermann resided. Second, the HK Planning Document's creation in 2000, the same year Valerie Mack was murdered, as well as its description of DS-1, or the first "dump site" as Mill Road, which is where the remains of Ms. Mack were discovered, further emphasizes the document's relevance to the Valerie Mack homicide investigation. Furthermore, the dismemberment of Ms. Mack's right leg, where she had a tattoo of her son's name, was clearly intended to inhibit the identification of Ms. Mack, which is corroborated by the HK Planning Document, its presence on Heuermann's laptop computer, and the mutilation of Jessica Taylor's tattoo in a similar fashion. Finally, the Gilgo Homicide Task Force members believe that Rex A. Heuermann's possession of numerous publications relating to not only the "Gilgo Four," but also Sandra Costilla, Valerie Mack, and Jessica Taylor, indicates the Defendant's attempts to remind himself of the events that occurred throughout the murders of each victim, revealing Rex A. Heuermann's utter lack of disregard or remorse for his actions, or the victims.

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 seventh 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: December 17, 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

(Previously filed, available upon request)

EXHIBIT B

HK2002-04

PROBLEMS

-DNA
-TIRE MARKS
-BLOOD STAINS
-FINGER PRINTS
-M/O(PLASTIC BAG/
CAT LITTER)
-WITNESS
-TRACE SOURCE
OF SUPPLIES
-FOOT/SHOE PRINTS
-PHOTOS?
-MISS-LEADERS?
-POLICE STOP
-TRUCK STUCK
-FINGER PRINTS
IN GLOVES
-PLATIC BAGS MATCHED
TO BOX
-HAIR & FIBER

SUPPLIES

-BOOTIES
-LIE / ACID
-POLICE SCANNER
-ROPE / CORD
-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 STRAP

DS

DS-1,MILL RD.
DS-2, ??????
DUMPSTER SITE
(NEXT TIME RECON
DUMSTER LOCATIONS)

TRG

T-1, MEGAN ?
SMALL IS GOOD
T-UNK (BLACK)

PRE-PREP

VECH. INSP.
ENGAGE T-1
RECON DS-1
LOCATE DS-2
WEATHER REPORT
RECON VID. CAMS.
RECON PICK-ZONE FOR VID.CAMS.

PREP

SET-UP STAGE
HOLDING AREA
BUILD TABLE
CROSS BAR
HARD POINT

POST EVENT

DISTROY FILE
CHANGE TIRES
BURN GLOVES
DISPOSE OF PIC'S
HAVE STORY SET

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 = DISORIGINANIZED

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)

BODY PREP:

- WASH BODY INSIDE AND ALL CAVITIES
- REMOVE TRACE EVIDENCE [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.