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JUL 26 2017 *YJ*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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JUL 26 2017

MICHAEL T. MASON
UNITED STATES MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT

UNITED STATES OF AMERICA)

) No.

v.)

HEATHER L. MACK and
TOMMY E. SCHAEFER

) Violations: Title 18, United States Code,
) Sections 956(a)(1), 1117 and 1512(c)(1)

JUDGE NORGLÉ
MAGISTRATE JUDGE ROWLAND

COUNT ONE

The SPECIAL FEBRUARY 2016 GRAND JURY charges:

1. At times material to this Indictment:
 - a. Sheila A. Von Wiese was a citizen of the United States of America.
 - b. Defendant HEATHER L. MACK was a citizen of the United States of America and Von Wiese's daughter.
 - c. Defendant TOMMY E. SCHAEFER was a citizen of the United States of America and involved in a romantic relationship with HEATHER L. MACK.
 - d. The St. Regis Bali Resort was located in the Republic of Indonesia.
2. Beginning not later than on or about August 2, 2014, and continuing until on or about August 12, 2014, at Chicago, in the Northern District of Illinois, and elsewhere,

HEATHER L. MACK and
TOMMY E. SCHAEFER,

defendants herein, while located within the jurisdiction of the United States, conspired with each other to commit at a place outside the United States, namely, in the Republic of Indonesia, an act that would constitute the offense of murder if committed in the special maritime and territorial jurisdiction of the United States, being the unlawful killing of Sheila A. Von Wiese with malice aforethought, and one or more of the conspirators committed an act within the jurisdiction of the United States to effect an object of the conspiracy.

3. It was part of the conspiracy that HEATHER L. MACK and TOMMY E. SCHAEFER concealed, misrepresented, and hid, and caused to be concealed, misrepresented, and hidden, the existence and purpose of the conspiracy and the acts done in furtherance of the conspiracy.

4. In furtherance of the conspiracy and to effect its objects and purposes, the following overt acts, among others, were committed by the defendants:

a. On or about August 2, 2014, HEATHER L. MACK boarded an airplane at O'Hare International Airport in Chicago, Illinois.

b. On or about August 10, 2014, HEATHER L. MACK arranged for TOMMY E. SCHAEFER to travel from Chicago, Illinois, to Bali, Indonesia.

c. On or about August 10, 2014, TOMMY E. SCHAEFER sent a message to Individual A, asking that Individual A provide money to TOMMY E. SCHAEFER.

d. On or about August 10, 2014, TOMMY E. SCHAEFER boarded an airplane at O'Hare International Airport in Chicago, Illinois.

e. On or about August 11, 2014, TOMMY E. SCHAEFER exchanged messages with Robert Ryan Justin Bibbs regarding different ways to kill Von Weise.

f. On or about August 12, 2014, HEATHER L. MACK and TOMMY E. SCHAEFER exchanged messages in which they discussed how and when to kill Von Wiese.

g. On or about August 12, 2014, TOMMY E. SCHAEFER entered Room 317 at the St. Regis Bali Resort while HEATHER L. MACK and Von Wiese were inside the room.

h. On or about August 12, 2014, HEATHER L. MACK and TOMMY E. SCHAEFER killed Von Wiese.

i. On or about August 12, 2014, HEATHER L. MACK and TOMMY E. SCHAEFER placed Von Wiese's body into a suitcase.

j. On or about August 12, 2014, HEATHER L. MACK and TOMMY E. SCHAEFER loaded the suitcase containing Von Wiese's body into the trunk of a taxicab.

In violation of Title 18, United States Code, Sections 956(a)(1) and (2)(A).

COUNT TWO

The SPECIAL FEBRUARY 2016 GRAND JURY further charges:

1. Paragraphs 1 and 3 of Count One are incorporated here.
2. Beginning not later than on or about August 2, 2014, and continuing until on or about August 12, 2014, at Chicago, in the Northern District of Illinois, and elsewhere,

**HEATHER L. MACK and
TOMMY E. SCHAEFER,**

defendants herein and nationals of the United States, conspired with each other to kill and attempt to kill Sheila A. Von Wiese, a national of the United States, while Von Wiese was outside of the United States but in the jurisdiction of the Republic of Indonesia, in violation of Title 18, United States Code, Section 1119.

3. The overt acts alleged in Paragraph 4 of Count One are incorporated here.

In violation of Title 18, United States Code, Section 1117.

COUNT THREE

The SPECIAL FEBRUARY 2016 GRAND JURY further charges:

On or about August 12, 2014, in the Northern District of Illinois and elsewhere,

HEATHER L. MACK and
TOMMY E. SCHAEFER,

defendants herein, each aiding and abetting the other, corruptly destroyed, mutilated and concealed objects, and attempted to do so, with intent to impair the object's integrity and availability for use in an official proceeding, by forcing the body of Sheila A. Von Wiese into a suitcase after she had been killed and removing the suitcase from the place of the murder; and by removing linens and items of clothing worn during the killing described in Count One and Count Two from the place of the murder.

In violation of Title 18, United States Code, Sections 1512(c)(1) and 2.

A TRUE BILL:

FOREPERSON

ACTING UNITED STATES ATTORNEY