

IN THE DISTRICT COURT OF SALINE COUNTY, NEBRASKA

|                    |   |                           |
|--------------------|---|---------------------------|
| STATE OF NEBRASKA, | ) | Case No. CR18-37          |
|                    | ) |                           |
| Plaintiff,         | ) | MOTION FOR LEAVE TO AMEND |
|                    | ) | INFORMATION               |
| vs.                | ) |                           |
|                    | ) |                           |
| AUBREY C. TRAIL,   | ) |                           |
|                    | ) |                           |
| Defendant.         | ) |                           |
|                    | ) |                           |
|                    | ) |                           |

COMES NOW Sandra J. Allen, Special Deputy Saline County Attorney, and respectfully asks leave to file an Amended Information. A copy of the Amended Information is attached hereto and incorporated by reference.

STATE OF NEBRASKA, Plaintiff

By: /s/Sandra J. Allen, #22318  
Sandra J. Allen, #22318  
Special Deputy Saline County Attorney  
2115 State Capitol  
Lincoln, NE 68509  
402-471-2682

CERTIFICATE OF SERVICE

The undersigned certifies and a true and accurate copy of the foregoing was served upon the defendant via Supreme Court e-filing system to the defendant's attorney of record, Benjamin H. Murray, (email: [ben@gmjlaw.com](mailto:ben@gmjlaw.com)) and Joseph H. Murray (email: [joemurray@gmjlaw.com](mailto:joemurray@gmjlaw.com)) 147 North 4<sup>th</sup> Street, P.O. Box 87, Hebron, Nebraska 68370, on this 1<sup>st</sup> day of March, 2019.

/s/Sandra J. Allen, #22318  
Sandra J. Allen  
Special Deputy Saline County Attorney



## COUNT I

on, about, or between the 15<sup>th</sup> and/or 16<sup>th</sup> days of November, 2017, in Saline County, Nebraska, AUBREY C. TRAIL did then and there purposely and with deliberate and premeditated malice kill Sydney Loofe,

## NOTICE OF AGGRAVATORS

Furthermore, the State hereby provides notice to the Defendant, that at the sentencing phase of the AUBREY C. TRAIL trial on his conviction for this charge of First Degree Murder of Sydney Loofe, the State intends to adduce evidence of the following aggravating circumstances:

- (a) The offender has a substantial prior history of serious assaultive or terrorizing criminal activity;
- (d) The murder manifested exceptional depravity by ordinary standards of morality and intelligence; and

## COUNT II


on, about or between the 15<sup>th</sup> day of November through the 4<sup>th</sup> day of December, 2017, Aubrey C. TRAIL did then and there knowingly or intentionally throw away or abandon human skeletal remains of Sydney Loofe, in a place other than a regular place for burial, and without issuance of a proper death certificate obtained in accordance with Nebraska statutes;

## COUNT III

on or about, or between the 1st day of July through the 30<sup>th</sup> day of November, 2017, Aubrey C. Trail, with the intent to promote or facilitate the commission of first degree murder did agree with one or more persons that they or one or more of them shall engage in or solicit the conduct or shall cause or solicit the result of first degree murder, and he or another person with whom he conspired committed an overt act in pursuance of the conspiracy, including at least one of the following overt acts:

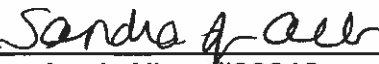
1. Bailey Boswell solicited young females through social networking sites;
2. Aubrey Trail and Bailey Boswell recruited others to commit murder;
3. Together with Bailey Boswell selected a victim to murder;
4. Together with Bailey Boswell purchased materials used to kill and/or dismember Sydney Loofe;
5. Together with Bailey Boswell disposed of Sydney Loofe's body;

contrary to the form of the Statutes in such cases made and provided, and against the peace and dignity of the State of Nebraska.

  
 \_\_\_\_\_  
 Sandra J. Allen, #22318  
 Special Deputy Saline County Attorney

STATE OF NEBRASKA            )  
                                           ) ss.  
 COUNTY OF LANCASTER        )

Sandra J. Allen, being first duly sworn upon oath, deposes and says that she is the Special Deputy Saline County Attorney of Saline County, Nebraska, in the First Judicial District of the State of Nebraska, and the allegations and charges against Aubrey C. Trail, in the foregoing Information are true as she verily believes.

  
 \_\_\_\_\_  
 Sandra J. Allen, #22318  
 Special Deputy Saline County Attorney

SUBSCRIBED in my presence and sworn to before me this \_\_\_\_ day of March, 2019.

---

NOTARY

WITNESSES:

Inv. William W. Black, AGO  
Inv. Anna Brewer, AGO  
Inv. Kerry Crosby, AGO  
Inv. Tina Oliver, AGO  
Inv. Edward Sexton, AGO

SA Michael Maseth, FBI  
SA Troy Murdock, FBI  
SA Gregg O'Brien, FBI  
SA Jason Sahin, FBI KS  
US Marshall Keyes  
SA Noah Eames, FBI  
Jordan Warnock, FBI  
SA Donald Ramaker, FBI  
Karen M. Bertram, FBI  
SA Scott James, FBI  
SA De Emigh, FBI  
SA Kevin Hutson, FBI  
FoA Brandi S. Hayes, FBI  
Robert Kardell, FBI  
SA Jonathan Spaeth, FBI  
SA Jeff Becker, FBI  
Becca Peterson, FBI  
Jonna Sabo, FBI  
SA Jonathan Tucker, FBI  
SA Micahel Buono, FBI  
SA Zach Johns, FBI  
SA Nicholas Pattratz, FBI  
Matthew Murphy, FBI

SA Brandon Soden, FBI  
Lavon Tienken, FBI  
SA Jeremy Witmer, FBI  
SA Adam Topping, FBI  
SA David Keith, FBI  
SSRA Philip Lenz, FBI  
SA Robert E. King, FBI  
SA David Harris, FBI  
SA Carrie Sawicki, FBI  
SA Anthony Peterson, FBI  
SA Gregory Sturtevant, FBI  
SA Dwayne A. Brewer, FBI  
SA Brandon Day, FBI  
Nathaniel Fast, FBI  
SA Nathan Houpt, FBI  
SA Jonathan Moeller, FBI  
SA Jessica Williams, FBI  
SA Michael Brewer, FBI  
SA Michael Wagoner, FBI  
SA Michelle Neily, FBI  
SA Timothy Flohrschutz, FBI  
SA Jake Foiles, FBI  
SA Jeffrey Carlson, FBI  
SA Monte Czaplewski, FBI  
SA Michael Miller, FBI  
Matthew Saad, FBI  
SA Jeffrey Hinrichs, FBI  
SA David Warren, FBI  
FoA Brian Koechner, FBI

SA Dana Kreeger, FBI  
SA Bradley Greene, FBI  
Georgi Robert, FBI  
Robbie Ramirez, FBI  
John Hallock, FBI  
Brian Schember, SIS

FOS Bradley Greene, FBI  
IA Kenneth Hines, FBI  
Ann Heidbrink, FBI  
Adam Marcotte, FBI  
Glenn Moule, FBI

Capt. Bucher, LPD  
Cpt. McGuire, LPD  
Cpt. Morrow  
Inv. Matt Franken, #1184 LPD  
Inv. Cronin, LPD  
Inv. Milisits, LPD  
Inv. Cameron Cleland, #1294 LPD  
Inv. Miller, LPD  
Sgt. Miller, #1397 LPD  
Inv. Dustin Romshek, #1662 LPD  
Inv. Lacey Reha, #1631 LPD  
Inv. Pflanz, #1654 LPD  
Inv. Fields, 1618 LPD  
Inv. Tran, #1669 LPD  
Inv. Weinmater, #883 LPD  
Ofc. Ben Miller, LPD  
Ofc. Pam (Last Name Unknown)  
Ofc. Hume, #1775 LPD  
Ofc. Salcedo, #1778  
Ofc. Wunderlich, #1517  
Ofc. Yindrick, #1118  
Ofc. M. Hubka, #1655 LPD  
Ofc. K. Cates, #444 LPD  
Ofc. Ulmer, #3488 LPD  
Inv. Hurley, #882 LPD  
Ofc. Elley, #1533 LPD  
Sgt. Koziol, LPD  
Sgt. Melissa Ripley, #1256 LPD  
Ofc. M. Ripley, #1331, LPD  
Sgt. Cooper, LPD  
Sgt. Dilsaver, #1596 LPD  
Sgt. Toupin, #1209 LPD  
CSI Jared Minary, LPD

Ofc. Mangels, #963 LPD  
Ofc. Yaussi, #1456, LPD

Ofc. Rensch, #1740 LPD  
Greg Sims, LPD Narcotics  
Steve Niemeyer, LPD  
Inv. Golden, #1532 LPD  
Brian Warner, UNLPD  
Ofc. Byum, #1979 LPD  
Ofc. Smith  
Sgt. Agnew, #1249 LPD  
Ofc. K. Koerner, #3361 LPD  
Ofc. J. Butler, #816 LPD  
C. Harmon  
Dispatcher Gaza  
Ofc. Rennerfeldt, #1563 LPD  
Ofc. Ground, #1582 LPD  
Ofc. Schwenke, #1768 LPD  
Ofc. Hagadorn, #1792 LPD

Sgt. Rich Zimmerman, #9228, Saline CSO  
Sgt. Kev Ouer, Saline CSO  
Dpt. Semrad, Saline CSO  
Dpt. Hudeberg, Saline CSO  
Sheriff Alan Moore, Saline CSO  
Inv. Ken Uher, Saline CSO  
Dpt. Jonas, Saline CSO  
Dpt. Lytle, Saline CSO

Dpt. Semerad, Saline CSO

Sgt. Cory Townsend, NSP  
Inv. Pedram Nabegh, #314 NSP  
Inv. Koenig-Warnke, NSP  
Anna Idigima, #646 NSP  
Trp. Thomas Giffie, #105 NSP  
Jason Linder, Biology Unit Manger NSP Crime Lab  
Amy Weber, NSP Crime Lab  
Katie Rector, NSP Crime Lab  
Pam Zilly, Director NSP Crime Lab  
Jeff, Bracht, NSP Crime Lab  
Heidi Ellingson, NSP Crime Lab  
Dani Oshlo, NSP Crime Lab  
Brandy Porter, NSP Crime Lab  
Ming Hansen-Gong, NSP Crime Lab  
Celeste Laird, Manager NSP Crime Lab

Jerry Smith, NSP Crime Lab  
Vicky Cowan, NSP Crime Lab  
Maggan Macomber, NSP Crime Lab  
Amanda Neely, NSP Crime Lab  
Jake Oshlo, NSP Crime Lab  
Brad Ruthledge, NSP Crime Lab  
Debra Davis, NSP Crime Lab  
Abbey Dodds, NSP Crime Lab  
Mike Auten, NSP Crime Lab  
Mariana Ward, NSP Crime Lab  
Bridget Driver, NSP Crime Lab  
Sarah Zarnick, NSP Crime Lab  
Kent Weber, NSP Crime Lab  
Jan Johnson, NSP Crime Lab  
Heidi Young, NSP Crime Lab  
Vicki Hopkins, NSP Crime Lab  
Margaret Wiesen, NSP Crime Lab

Mellissa Helligso, UNMC

Brian Warner, UNLPD  
Josh Clark, LSO  
Det. Arnette  
Virginia, Dispatcher Thomas County  
Martia, Cedar County  
Kevin Garvin, Cedar CSO  
Sgt. Ronald Koch, Crete PD  
Ofc. Puckett, Crete PD  
Ofc. McConnell, Grand Island PD  
Ofc. Goldsberry, Falls City PD  
Sgt. Stamper, Falls City PD  
Officer Goldsberry, Falls City PD  
Sgt. McClure, Sioux City PD  
Det. McDermott, OPD  
Ofc. Braun, OPD  
Dispatcher Logan Roehr, #904, Marshal County SD SO  
Trooper Stepanchick, York, PA  
Yuhas, Corrections Officer  
Det. Brad Echter, Sioux City PD  
Ofc. Chad Mertz, Aurora, NE PD



Chief Yates Ellis, KS Police  
Sgt. Marci Gebers, Brooking SD Police  
Cpt. Farber  
Inv. Sadlier, North Platte PD  
Ofc. Gethman, Spencer Police, IA  
Elijah Hanson, Ames Iowa PD  
Sheriff Scottie Becker, Osborne County Sheriff's Office, KS  
Sgt. Mayo, Ames, IA  
Nicole Miller, NE Board of Parole  
Nathan Cox, Sarpy County Attorney (Judge)  
Commander Geoff Huff, Ames IA PD  
Sgt. Eli Hansen, Ames IA PD  
Erik A. Rezabek, PI  
Sgt. Raughton, #1075 Sarpy CSO  
Chad Standard, Iowa DCI Special Agent

Eric Miller, Lancaster County Attorney's Office  
Joe Kelly, Lancaster County Attorney's Office  
Pat Condon, Lancaster County Attorney's Office  
Josh Clark, Lancaster CSO  
Judge Colborn

Dr. John Filippi, Forensic Odontology  
Dr. Tim Brovont, Neligh Family Dentistry  
Dr. Steven Syms, Forensic  
Dr. Cynthia A. Gubbels  
Dr. Michelle Elieff, Medical Examiner

George M. Pickens  
LaJuanita, Sioux City Restaurant  
Johnny – Employee of LaJuanita  
Paul Beekhuizen, US Postal Inspector  
Deborah S. Blacketer – US Post Office Lead Clerk

Susan Loofe  
George W. Loofe  
Mackenzie Loofe  
Brad Schultze – Sydney's Uncle  
Alan Koll

Mikala Miller  
Ashley Hills  
James Sisneroz  
Brittney Kallhoff (Flinn)  
Anastasia Golyakova

Jennifer Koll  
Jennifer Brandle  
Justin Biltoft  
Priscilla Boswell  
Audrey Cain – Possible alias for Boswell  
Jeffrey Boswell  
Donna Sue Tellier – Boswell's Grandmother – Deceased  
Randy Hobbs – Boswell's Grandfather  
Freddy Pannell – Father of Boswell's child  
Jocelyn Pinegar – Boswell's Half sister  
Nahla Pannell – Boswell's Daughter  
Timothy Payne  
Dayton Mack  
Bonnie Ennerking  
Michael Enneking  
Maranda J. Ford  
Kathy Thompson  
Brooklyn McCrystal  
Michael M. Gascon  
Addison M. Mills  
Justin Irwin  
Kurstie Barlene  
Aubrey LKU  
Matthew Baker  
Aubrey Cain  
Matthew Baker  
Miranda Malliat  
Tiffany Tyrrell  
Brian Johnson  
Leslie Greene  
Justin Case  
Dusty Sherer  
Justin D. Dixon  
Justin L. Coleman  
Justin Lee Sheridan  
Mikala R. Miller  
Destenie Commuso  
Ryan Boston  
Roni Zambiska  
Alex Ryan  
David Gotrik

Kaitlyn Brandle  
Brenen J. Shea

Dominick Pearmain  
Laura Quigley  
Katie Allen  
Brian Paustian  
Penny Halliwell  
Diane Kruse – Best Western Plus  
George Sherry, GM Best Western Plus  
Piper Niemann – Quality Inn & Suites  
Kiki Canby – Motel 6  
Misty Murphy – Holiday Inn Express  
Cameron Menne – AmericanInn  
Alex Van Norman – Hampton Inn  
Harley Kruger – Towne Place Suites  
Troy Stone – Countryside Suites  
Lisa Tennyson, Wells Fargo  
Peter Grim, American Express  
Amber Ledin, Great Western Bank  
Emily Burke, Rodeway Inn  
Michelle Ballard, Manager 76 Inn  
Merle L. Veigel, F & M Bank President  
Hunter Birdsall, Days Inn , Spencer IA  
Jenny Bloom, Grand Stay Hotel & Suites, Ames, IA  
Gavin Fawbush, Regional Manager, Grand Stay Hotel & Suites  
Anthony Santanasto – Staff Enterprise Rent A Car  
Keith Allerton – Steir Group  
Ralph E. Maloy  
Jeffrey M. Rodgers  
Penny Rodgers  
Janet Lamb  
Rade Slavujevic – Ameristar Security  
Kevin Henry – Ameristar Security Officer  
Steven Huston, Harrah's Security  
Ryan Lahr, Hard Rock Casino Security Supervisor  
Crystal R. Sanchez  
Katherine L. Russell  
Eugene Y. Kunzetzov  
Kelsey Tillman  
Dennis L. Duncan  
Keith A. Fox, Truck Driver  
Erica Blodgett, Frist National Bank  
Rachel M. Rensch

Shaylee D. Crawford  
Frederick Pannell  
Logan Ellis  
Alice Ellis/Nolte  
Malinda Cole  
Brandi D. Reimers  
Steve Klecan  
Trish Adkins  
Terra N. Gehrig  
Michael M. Gascon  
Gary Wergin, C Station  
Ashley R. Bradford  
Crystal Jensen  
Jim Bishop  
Justin Biltoft  
Lorrie Orman, Aardvark Antiques  
Norma Rivera, Senior Paralegal at Match Group, LLC  
Lori Rae Robinson  
Jan McQuistan  
Katrina Keogh  
Michaelene (Blaske) Trail – Aubrey's ex-wife  
James Callahan  
Allen Gambino – Alias for Aubrey Trail  
Alan Aubrey Russell – Alias for Aubrey Trail  
Jeffrey Boswell – Aubrey Trail used when in York, PA  
Teena Hill  
Daion Roberson  
Akeelah Roberson  
Casey D. Hansen, Tinder Contact  
Bryce Molt  
Dalton Michael Ramsey  
Sibit Lam Koang  
Raymond Martens  
Missy Archer (Possible fake profile)  
Sergio Carrera  
Tom or Tim (UNL) – Purchase of gun  
Robert D. Moyer – Brother of Katherine Russell  
Douglas E. Merz, Attorney  
Kimberly Stevens  
Candice Rigby  
Blaine Pollack

Jason Sickler  
Ryan Grotelushchen  
Carla Waldbaum  
Michelle Virapanya  
Nathan Kroeze  
Lars Ostrom  
Ashley Roumph  
James Prokop  
Carol Miller  
Ken Jones  
Jennifer Jensen  
Mike Kriutzfield  
Geanie Dirks – Jeanene M. Dirks  
Laura Black  
Dina Lamprecht  
Mickey Blaske  
MaryAnn Simpson  
Ben (UNL) from Hullman Ford, Falls City  
Hunter Kristine  
Nicole Pullen  
Kathy Judd  
Addison Mills  
Jamie Rosenthal  
Ciji Mays  
Sherrie Due  
Mark Due  
Shelly Due  
Lonnie Blevins  
Auralea Butzke  
Jeffrey Butzke  
Teresa Anderson  
Tyler R. Cartre  
Kathy Stramberg  
Tonya Woods  
Lisa Meadows  
Jordan – Trenton Missouri  
Sarah Hanrahan  
Lianna Prill  
Jamie Jensen  
Judy Rosecrans  
Ronda L. Chab

Richard Bohrer  
Sam Sharpe  
Taylor Tweedy  
Caleb Kisky  
Jim Churray  
Mary Jo Alison Earnhardt, a/k/a Alison Earnhardt  
Sam Giles  
Randi (UNL)  
Kirk Drake  
Denise (UNL) – Beresford, SD  
Charis (UNL) – Beresford, SD  
Diana Orton  
Carla Lunsford  
Riley Hamilton  
Maia C. Smith, Superior Dental Health  
Emily Waltman, Bumble Tip  
Miriam L. Simpson  
Ashley Mares, Tipster  
Erin Carroll, Tipster  
Karen Harms, Tipster  
Scott Engelhart  
Jennifer Perales, Bus Depot Employee  
Erica Pemberton  
Charles Rivenburg  
Avery J. Thrasher  
Augustin Rivera  
Kathy Davidson – Psychic  
Christie UNL – Tipster  
Desiree Dean – Tipster  
Brandon Johnson – Tipster  
Michael A. Greer  
William Conroy  
Margret Conroy  
Bryan Conroy  
Della Binnick, America Best Value Inn  
Nick Binner – Amtrak Train  
Misty Thomas  
Pat W. Lawson- Aardvark Antique Mall  
Kevin Henry  
Paula Mckillip – University of Nebraska Assistance Manger Information & Technology  
Magan Yank – Real Estate Investment Solutions

Neligh Family Dentistry  
Deborah A. Stevens (DOB: 01/10/55) - Newton

Dan Habel – Mike's 66 towing  
Evan Bowers-Davis – Phillips 66  
Walker Tire  
Sunbelt Rentals  
One Shot Auto Repair  
Nebraska Auto Auction  
Debra Hood – Mapes Canopies  
Jeremy Shutts  
Bauer Built Tire  
Ultimate Diesel Performance  
Real Deal Auto Detailing  
D & D Plumbing  
MWC Truck and Refuse  
Heartland Tires and Treads  
Titan Machinery  
Casey's Auto  
Nature's Variety  
Quality AG Sales  
Old Home Bread  
IBt  
Ken Harvey – Orscheln  
Casey's General Store  
A & D Auto and Truck Services  
Travis Gonzalez - Wayne's Northeast

James Hilkemann, Menards General Mngr  
Donald Maxson, Menards Asst. Gen. Mngr.  
Shayna Delaine Fox, Menards Loss Prevention  
Charles (UNL), Menards Manager  
Jeremy (UNL), Menards Manager  
Anthony A. Smith, Menards  
Rosanne Chapp, Menards  
Leah Shaw, Menards  
Kayla M. Olson, Menards  
Nic Heinrich, Menards Investigator  
Mikala Miller, Menards

## SEARCH GROUPS

### Group 1 – Turkey Creek/Hwy 41

Russ Kalkward  
Matt Baumann  
Dillon Semrad  
Jake Wirthele  
Dan Clancy  
Tom Hudiburgh  
Jake Foiles  
Lavone Tienken  
Jeff Carlson  
Pat Meister  
Tim Dolberg  
Jen Glantz

Brian Golden  
Fischer UNL  
Pembleston UNL  
Carther UNL

### Group 2 – Wilber NRD and lake

Kevin Vogel  
Cody Mulbery  
Pedram Nabegh  
Matt Jones  
Tony Lytte  
Jeff Becker  
Jonaa Sales  
Jason Hellmuth  
Christ Weber  
Chris Vigil  
Lynette Russell  
Nate Hill  
Aaron Bergren

### Group 3 – North and east of Clatonia

John Hensel  
Tim Hansen  
Tyosn Osborn  
Lonnie Connelly  
Scott Gaston



Brandon Sodra  
Rebecca Peterson  
Andy Watson  
Jon Rennerfeldt  
Dee Toupin  
Jarad Minary  
Wendy Ground  
Alex Kelley

## Certificate of Service

I hereby certify that on Friday, March 01, 2019 I provided a true and correct copy of the Motion Filed to the following:

Trail,Aubrey,C represented by Murray,Joseph H, (Bar Number: 12994) service method:  
Electronic Service to joemurray@murraylawpcilo.com

Trail,Aubrey,C represented by Benjamin H. Murray (Bar Number: 24951) service method:  
Electronic Service to benmurray@murraylawpcilo.com

Golyakova,Anastasia, service method: No Service

State of Nebraska represented by Eickman,Tad,D (Bar Number: 15655) service method:  
Electronic Service to eickmanlaw@hotmail.com

State of Nebraska represented by Michael Guinan (Bar Number: 21950) service method:  
Electronic Service to michael.guinan@nebraska.gov

Signature: /s/ Sandra Allen (Bar Number: 22318)