IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI **SOUTHWESTERN DIVISION**

UNITED STATES OF AMERICA,

No.

Plaintiff,

v.

(1) AMBER DAWN WATERMAN, and

[DOB: 3-12-1980]

(2) JAMIE S. WATERMAN

[DOB: 6-16-1980]

Defendants.

COUNT 1

18 U.S.C. § 1201(a)

NMT Death

NLT Life Imprisonment

NMT \$250,000 Fine

Class A Felony

COUNT 2

18 U.S.C. § 1841

NLT Life Imprisonment

NMT \$250,000 Fine

Class A Felony

COUNT 3

18 U.S.C. § 3

NMT 15 Years Imprisonment

NMT \$125,000 Fine

NMT 3 Years Supervised Release

Class C Felony

\$100 Special Assessment

(Each Count of Conviction)

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

Between October 31, 2022, and November 2, 2022, said dates being approximate, in McDonald County, in the Western District of Missouri, and elsewhere, the defendant, AMBER **DAWN WATERMAN**, did unlawfully and willfully kidnap, abduct, carry away, and hold Ashley Bush, for the purpose and benefit of claiming Valkyrie Grace Willis as the defendant's child, and willfully transported Ashley Bush in interstate commerce from Maysville, Arkansas, across the

state line to Pineville, Missouri, the actions of the defendant resulting in the death of Ashley Bush,

all in violation of Title 18, United States Code, Section 1201(a)(1).

COUNT 2

Between October 31, 2022, and November 2, 2022, said dates being approximate, in

McDonald County, in the Western District of Missouri, and elsewhere, the defendant, AMBER

DAWN WATERMAN, did commit the kidnapping resulting in the death of Ashley Bush as

charged in Count 1, and thereby caused the death of a child in utero, in violation of Title 18, United

States Code, Section 1841.

COUNT 3

Between October 31, 2022, and November 2, 2022, said dates being approximate, in

McDonald County, in the Western District of Missouri, and elsewhere, the defendant, JAMIE S.

WATERMAN, knowing that an offense against the United States has been committed, to wit,

kidnapping resulting in death, did receive, relieve, comfort, and assist the offender, Amber

Waterman, in order to hinder and prevent the offender's apprehension, trial, and punishment, in

violation of Title 18, United States Code, Section 3.

A TRUE BILL.

/s/ Clint Strong

FOREPERSON OF THE GRAND JURY

/s/ Stephanie Wan

STEPHANIE L. WAN

Assistant United States Attorney

Missouri Bar No. 58918

Dated:

6/27/2023

Springfield, Missouri

2

Reset Form

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

| County of C | | Matter to be Sealed | | | | | |
|------------------------------|--|--|---|---------------------------|---------|----------|--|
| McDonald / | _ | ☐ Secret Indictment☐ Juvenile | | | | | |
| Defendant I | nformation | | | _ Juve | | | |
| Defendant N | Vame: | Amber Dawn | Waterman | | | | |
| Alias Name: | : | | | | | | |
| Birth Date: | | 03-12-1980 | | | | | |
| Superseding New Defend | | ■ Yes □ Yes | No If yes, original ca ■ No 22-mj-02058-DPR | se number: 22-05035-01-CR | -SW-SRB | | |
| Prior Target | Letter Case N | Number, if any | : | | | | |
| U.S. Attorno | ey Informatio | on | | | | | |
| AUSA War | n, Stephanie | L. | | | | | |
| Interpreter ☐ Yes Lan ■ No | Needed? nguage and/or | r Dialect: | | | | | |
| Location St | atus | | | | | | |
| Arrest Date: | | | | | | | |
| ■ Currently | Writ Requi | red? | ☐ Yes | ■ No | | | |
| ☐ Currently ☐ Currently | Warrant Re | equired? | ☐ Yes | ■ No | | | |
| U.S.C. Citat Total # of C | | 2 counts | _ | | | | |
| Set | Index Key & Description of Offense Charged | | | Charged | | Count(s) | |
| 1 | 18:1201.F KID | NAPPING | | | | 1 | |
| 2 | 18:1841.F PRO | TECTION OF U | NBORN CHILDREN | | | 2 | |
| 3 | | | | | | | |
| | | | | | 1 | | |

Reset Form

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MISSOURI

CRIMINAL CASE COVER SHEET

| County of Offe | ense / Division of Filing | Matter to be Sealed | | | | | | |
|----------------------------------|---------------------------|---|----------------|---------|------|--|--|--|
| McDonald / Son | uthwestern | ☐ Secret Indictment☐ Juvenile | | | | | | |
| Defendant Info | ormation | | | - | | | | |
| Defendant Nam | Name: Jamie S. Waterman | | | | | | | |
| Alias Name: | | | | | | | | |
| Birth Date: | 06-16-1980 | | | | | | | |
| Related Case In | nformation | | _ | | | | | |
| Superseding Ind New Defendant | _ | No If yes, original case number:■ No | 22-05035-02-CR | -SW-SRB | | | | |
| Prior Complain | t Case Number, if any: | 22-mj-02059-DPR | | | | | | |
| Prior Target Le | tter Case Number, if any | <i>7</i> : | | | | | | |
| U.S. Attorney l | Information | | | | | | | |
| AUSA Wan, S | tephanie L. | | | | | | | |
| Interpreter Ne | eded? | | | | | | | |
| - | age and/or Dialect: | | | | | | | |
| ■ No | | | | | | | | |
| Location Statu | s | | | | | | | |
| Arrest Date: | | | | | | | | |
| ■ Currently in | Federal Custody | Writ Requir | ed? | Yes | ■ No | | | |
| ☐ Currently in | Warrant Re | quired? | Yes | ■ No | | | | |
| Currently on | Bond | | | • | | | | |
| U.S.C. Citation Total # of Coun | | _ | | | | | | |
| Set | Index Key | | Count(s) | | | | | |
| 1 18: | 3.F ACCESSORY AFTER | | | 1 | | | | |
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