

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

FILED  
U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA  
2018 APR 24 AM 11:15

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NATASHA M. WOLFE,

Defendant.

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INFORMATION  
18 U.S.C. § 1117  
18 U.S.C. § 1153

The United States Attorney charges:

COUNT I

On or about the 23<sup>rd</sup> of April, 2017, in the District of Nebraska, on and within the Winnebago Indian Reservation, the defendant, Natasha M. Wolfe, an Indian, and others, knowingly and willfully conspired and agreed together to kill with malice aforethought, W.R., an Indian, by strangling W.R. and beating him with their fists, and a blunt instrument and leaving him unattended in the grass where he fell and later died, in violation of Title 18, United States Code, Sections 1111 and 1153.

OVERT ACTS

In furtherance of the conspiracy, the following overt acts among others, were committed in the District of Nebraska and within the Winnebago Indian Reservation, on or about April 23, 2017:

- (a) The defendant and other conspirators repeatedly struck W.R. about the head and body.
- (b) The defendant used a blunt instrument to strike W.R. about the face as he was restrained in a choke hold.

- (c) While defendant and others repeatedly struck W.R., another conspirator choked him until W.R. lost consciousness and died of asphyxia or strangulation by an applied arm hold.
- (d) The defendant and other conspirators left W.R. in the grass where he fell without seeking emergency or medical assistance where he remained for more than four hours before he was discovered dead.
- (e) The defendant and other conspirators traveled together to the defendant's residence where they washed their blood-stained clothes.

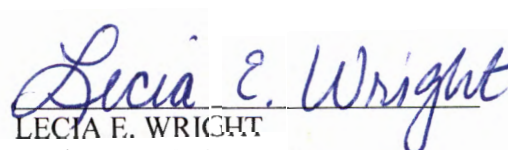
In violation of Title 18, United States Code, Section 1117.

UNITED STATES OF AMERICA,  
Plaintiff

JOSEPH P. KELLY  
United States Attorney  
District of Nebraska

  
LECIA E. WRIGHT, NE # 24562  
Assistant U.S. Attorney

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.

  
LECIA E. WRIGHT  
Assistant U.S. Attorney