

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Criminal Case No.

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. CHELSEA DAWN GERLACH,
2. STANISLAS GREGORY MEYERHOFF,
3. JOSEPHINE SUNSHINE OVERAKER,
4. REBECCA JEANETTE RUBIN,

Defendants.

---

INDICTMENT  
18 U.S.C. § 844(i)  
18 U.S.C. § 2

---

COUNT 1

The Grand Jury charges that:

1. At all times relevant to the charge contained in this count, Two Elk Lodge was a building located at the Vail ski area in Eagle County, Colorado.

2. At all times relevant to the charge contained in this count, Two Elk Lodge was used in interstate and foreign commerce and in activities affecting interstate and foreign commerce.

3. On or about October 19, 1998, in the State and District of Colorado, CHELSEA DAWN GERLACH, STANISLAS GREGORY MEYERHOFF, JOSEPHINE SUNSHINE OVERAKER and REBECCA JEANETTE RUBIN malicious-

ly damaged and destroyed by means of fire Two Elk Lodge and aided, abetted and willfully caused the same.

The foregoing was in violation of Title 18, United States Code, Sections 844(i) and 2.

COUNT 2

The Grand Jury charges that:

1. At all times relevant to the charge contained in this count, Camp 1 restaurant was a building located at the Vail ski area in Eagle County, Colorado.

2. At all times relevant to the charge contained in this count, Camp 1 restaurant was used in interstate and foreign commerce and in activities affecting interstate and foreign commerce.

3. On or about October 19, 1998, in the State and District of Colorado, CHELSEA DAWN GERLACH, STANISLAS GREGORY MEYERHOFF, JOSEPHINE SUNSHINE OVERAKER and REBECCA JEANETTE RUBIN maliciously damaged and destroyed by means of fire Camp 1 restaurant and aided, abetted and willfully caused the same.

The foregoing was in violation of Title 18, United States Code, Sections 844(i) and 2.

COUNT 3

The Grand Jury charges that:

1. At all times relevant to the charge contained in this count, a building that included a ski patrol office and an operator's shack for ski lift 14 (also known as Sourdough Lift) was located at the Vail ski area in Eagle County, Colorado. (This building hereinafter will be referred to as the lift 14 building.)

2. At all times relevant to the charge contained in this count, the lift 14 building was used in interstate and foreign commerce and in activities affecting interstate and foreign commerce.

3. On or about October 19, 1998, in the State and District of Colorado, CHELSEA DAWN GERLACH, STANISLAS GREGORY MEYERHOFF, JOSEPHINE SUNSHINE OVERAKER and REBECCA JEANETTE RUBIN maliciously damaged and destroyed by means of fire the lift 14 building and aided, abetted and willfully caused the same.

The foregoing was in violation of Title 18, United States Code, Sections 844(i) and 2.

COUNT 4

The Grand Jury charges that:

1. At all times relevant to the charge contained in this count, a building that included the ski patrol headquarters and other facilities was located at the Vail ski area in Eagle

County, Colorado. (This building hereinafter will be referred to as the ski patrol headquarters.)

2. At all times relevant to the charge contained in this count, the ski patrol headquarters was used in interstate and foreign commerce and in activities affecting interstate and foreign commerce.

3. On or about October 19, 1998, in the State and District of Colorado, CHELSEA DAWN GERLACH, STANISLAS GREGORY MEYERHOFF, JOSEPHINE SUNSHINE OVERAKER and REBECCA JEANETTE RUBIN maliciously damaged and destroyed by means of fire the ski patrol headquarters and aided, abetted and willfully caused the same.

The foregoing was in violation of Title 18, United States Code, Sections 844(i) and 2.

COUNT 5

The Grand Jury charges that:

1. At all times relevant to the charge contained in this count, Buffalo's restaurant was a building located at the Vail ski area in Eagle County, Colorado.

2. At all times relevant to the charge contained in this count, Buffalo's restaurant was used in interstate and foreign commerce and in activities affecting interstate and foreign commerce.

3. On or about October 19, 1998, in the State and District of Colorado, CHELSEA DAWN GERLACH, STANISLAS GREGORY MEYERHOFF,

JOSEPHINE SUNSHINE OVERAKER and REBECCA JEANETTE RUBIN maliciously damaged and destroyed by means of fire Buffalo's restaurant and aided, abetted and willfully caused the same.

The foregoing was in violation of Title 18, United States Code, Sections 844(i) and 2.

COUNT 6

The Grand Jury charges that:

1. At all times relevant to the charge contained in this count, a building that included an operator's shack for ski lift 4 (also known as Mountaintop Express Lift) was located at the Vail ski area in Eagle County, Colorado. (This building hereinafter will be referred to as the lift 4 building.)

2. At all times relevant to the charge contained in this count, the lift 4 building was used in interstate and foreign commerce and in activities affecting interstate and foreign commerce.

3. On or about October 19, 1998, in the State and District of Colorado, CHELSEA DAWN GERLACH, STANISLAS GREGORY MEYERHOFF, JOSEPHINE SUNSHINE OVERAKER and REBECCA JEANETTE RUBIN maliciously damaged and destroyed by means of fire the lift 4 building and aided, abetted and willfully caused the same.

The foregoing was in violation of Title 18, United States Code, Sections 844(i) and 2.

COUNT 7

The Grand Jury charges that:

1. At all times relevant to the charge contained in this count, a building that included an operator's shack for ski lift 5 (also known as High Noon Lift) was located at the Vail ski area in Eagle County, Colorado. (This building hereinafter will be referred to as the lift 5 building.)

2. At all times relevant to the charge contained in this count, the lift 5 building was used in interstate and foreign commerce and in activities affecting interstate and foreign commerce.

3. On or about October 19, 1998, in the State and District of Colorado, CHELSEA DAWN GERLACH, STANISLAS GREGORY MEYERHOFF, JOSEPHINE SUNSHINE OVERAKER and REBECCA JEANETTE RUBIN maliciously damaged and destroyed by means of fire the lift 5 building and aided, abetted and willfully caused the same.

The foregoing was in violation of Title 18, United States Code, Sections 844(i) and 2.

COUNT 8

The Grand Jury charges that:

1. At all times relevant to the charge contained in this count, a building that included an operator's shack for ski lift 11 (also known as Northwoods Express Lift) was located at the Vail ski area in Eagle County, Colorado. (This building hereinafter will be referred to as the lift 11 building.)

2. At all times relevant to the charge contained in this count, the lift 11 building was used in interstate and foreign commerce and in activities affecting interstate and foreign commerce.

3. On or about October 19, 1998, in the State and District of Colorado, CHELSEA DAWN GERLACH, STANISLAS GREGORY MEYERHOFF, JOSEPHINE SUNSHINE OVERAKER and REBECCA JEANETTE RUBIN maliciously damaged and destroyed by means of fire the lift 11 building and aided, abetted and willfully caused the same.

The foregoing was in violation of Title 18, United States Code, Sections 844(i) and 2.

A TRUE BILL:

s/Foreperson  
FOREPERSON

WILLIAM J. LEONE  
United States Attorney

By: s/Thomas M. O'Rourke  
THOMAS M. O'ROURKE  
Assistant U.S. Attorney  
United States Attorney's Office  
1225 Seventeenth Street, Suite 700  
Denver, Colorado 80202  
Telephone: (303) 454-0209  
Fax: (303) 454-0402  
E-mail: [thomas.o'rourke@usdoj.gov](mailto:thomas.o'rourke@usdoj.gov)  
Attorney for the Government

By: s/Tim R. Neff  
TIM R. NEFF  
Assistant U.S. Attorney  
United States Attorney's Office  
1225 Seventeenth Street, Suite 700  
Denver, Colorado 80202  
Telephone: (303) 454-0100  
Fax: (303) 454-0402  
E-mail: [tim.neff@usdoj.gov](mailto:tim.neff@usdoj.gov)  
Attorney for the Government