

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Eastern District of California

**FILED**

**Dec 12, 2025**

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

United States of America

v.

Jack Matthew Propeck

Case No. 6:25-mj-00056-HBK

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 8th 2025 in the county of Mariposa in the  
Eastern District of California, the defendant(s) violated:

*Code Section*

*Offense Description*

36 CFR 2.17 (a) (3)

36 CFR § 2.17(a)(3) Delivering or retrieving a person or object by parachute, helicopter, or other airborne means, except in emergencies involving public safety or serious property loss, or pursuant to the terms and conditions of a permit

This criminal complaint is based on these facts:

See affidavit attached hereto and incorporated by reference.

☒ Continued on the attached sheet.



*Complainant's signature*

Cody Hays

*Printed name and title*

Sworn to me in accordance with Fed.R.Crim.P. 4.1.

Date: December 12, 2025



*Judge's signature*

City and state: Yosemite, Ca

Helena M. Barch-Kuchta US Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

**BACKGROUND OF AFFIANT**

1. I, Cody Hays, further state, I am a Law Enforcement Officer ("Officer"), employed by the National Park Service ("NPS"). I have worked in Yosemite National Park as a Law Enforcement Officer since 2022. I have completed the Federal Law Enforcement Training Centers' Land Management Police Training, a 17-week training. I am a nationally registered Advanced EMT (A-EMT) expanded scope as a "Parkmedic". I have investigated numerous acts of disorderly conduct, assaults, driving under the influence of alcohol/drugs, fighting, and domestic violence. I have also investigated several cases involving crimes being posted to social media. I have lived and worked in Yosemite National Park for 9 years, in a variety of roles to protect and preserve Yosemite's resources, visitors and community members.
2. The facts of this criminal complaint are based on my personal observations, on my training and experience, as well as my consultation with other LEOs. This affidavit is intended to show merely that there is sufficient probable cause for the criminal complaint and does not set forth all my knowledge about this matter.

**JURISDICTION**

3. The facts set forth in this criminal complaint occurred October 8<sup>th</sup> 2025, within the geographic boundaries of Yosemite National Park, California. Yosemite National Park is an area of federally owned public land administered by the NPS. Yosemite National Park is an area of the special maritime and territorial jurisdiction of the United States as defined by Title 18 U.S.C. § 7 (3): "Special maritime and territorial jurisdiction of the United States

1 defined” and by Title 16 U.S.C. § 57: “Yosemite and Sequoia National Parks; exclusive  
2 jurisdiction of United States.”

- 3  
4 4. Yosemite National Park is located within Mariposa, Madera, Mono and Tuolumne Counties,  
5 all of which are located within the Eastern District of California.

6 **CHARGES**

- 7  
8 5. Based upon the facts set forth in this criminal complaint, I believe probable cause existed to  
9 believe that Jack Matthew Propeck (PROPECK) violated the following laws of the United  
10 States on October 8<sup>th</sup> 2025 within Yosemite National Park:

11 a. *36 CFR § 2.17(a)(3) Delivering or retrieving a person or object by parachute, helicopter, or*  
12 *other airborne means, except in emergencies involving public safety or serious property loss,*  
13 *or pursuant to the terms and conditions of a permit.*  
14

15 **PROBABLE CAUSE**

- 16  
17 6. I, Officer Hays, on Tuesday October 14th, 2025, was forwarded a tip from the NPS tip line  
18 about an individual BASE jumping in Yosemite National Park. The tip included screen shots  
19 from an Instagram video of an individual base jumping off Glacier Point. The tip was  
20 submitted on October 10th, 2025, at approximately 1553 hours.  
21  
22 7. On October 8<sup>th</sup>, 2025, at approximately 12:30 PM an Instagram user with username  
23 @jack\_propeck (Profile ID#19320064) posted a video to Instagram of an individual jumping  
24 off Glacier Point in Yosemite National Park and using a parachute to land safely, this activity  
25 is commonly referred to as “BASE jumping”. Instagram video ID #DPj1tY\_AV15.  
26  
27  
28

- 1 8. The video shows an individual running off a cliff (Glacier Point) and free falling through the  
2 air above Yosemite Valley. The video pans to the individual's face before and as he deploys  
3 a parachute.  
4
- 5 9. I recognized the site that the individual jumps from as Glacier Point, a viewpoint within  
6 Yosemite National Park. I recognized it based on my numerous visits and patrols of the area.  
7 In the start of the video, the individual runs off a rock that runs between the railings of the  
8 viewpoint and the viewshed from Glacier point shows North Dome and Washington Column.  
9 Based on the angle of the sunlight hitting the topography in the background, it appears to be  
10 early in the morning, just following sunrise. Sunrise and sunset is a common time for BASE  
11 jumpers to jump because, less people are around, jumpers are more difficult to see and harder  
12 to catch.  
13  
14
- 15 10. The video was captioned "track like you mean it" The comments of the video includes many  
16 asking about the legality of BASE Jumping in Yosemite. @dieselpunk\_cummins asked,  
17 "How much was the attorney fees?" @jack\_propeck replied "I have a permit". Yosemite  
18 National Park does not issue permits for BASE jumping.  
19
- 20 11. PROPECK's Instagram profile is filled with numerous videos of him BASE jumping and  
21 skydiving in numerous locations across the world. The Glacier Point video was also posted to  
22 Facebook.com on a profile under the same name, Jack Propeck (Facebook account  
23 ID#100001478178068).  
24
- 25 12. In video posted by @jack\_propeck on August 6<sup>th</sup> 2025 captioned "My 1000<sup>th</sup> BASE jump. 3  
26 kinds of suits, 2 exits, 3 beer swoop n chugg, great friends all around." The video shows the  
27 same individual jumping from an unknown location (not in Yosemite National Park). It  
28



1 appears to be the same individual as the one in the Glacier Point video, with the same helmet,  
2 long hair and facial hair. The individual is also wearing the same, Pressurized Tube5,  
3 skydiving suit as the suit is dark blue with a light grey right arm. The individual also uses the  
4 same Atair BASE canopy as the individual in the Glacier Point video.  
5

6 13. I identified the individual in the Glacier Point BASE jumping video through his California  
7 driver's license photo as PROPECK. His California Driver's license was issued on October  
8 23<sup>rd</sup>, 2025.  
9

10 14. On October 18<sup>th</sup> 2025 I requested an FBI NCIC offline Hyper Search for PROPECK. The  
11 search results indicated that PROPECK was contacted on September 22, 2025, by an officer  
12 in Yolo County California. During that contact PROPECK was associated with a vehicle  
13 displaying California license plate 6JZT179. That license plate is registered to a silver 2009  
14 Smart car. That license plate was detected entering Yosemite National Park at Big Oak Flat  
15 entrance on October 7<sup>th</sup> 2025 at approximately 12:26PM and exiting Big Oak Flat entrance at  
16 approximately 10:34AM on October 8<sup>th</sup> 2025. The photos from Yosemite's license plate  
17 reader (LPR) system show PROPECK driving the silver Smart car. In the photos PROPECK  
18 is also wearing the same purple mirrored sunglasses as the individual in the BASE jumping  
19 video.  
20  
21  
22

23 15. On October 20<sup>th</sup>, 2025, I contacted PROPECK on the phone to discuss the video. PROPECK  
24 stated that it was not him in the video and that he just posts cool videos to his page. I stated  
25 that the video had his face in it. PROPECK stated that he uses Artificial Intelligence (AI) to  
26 superimpose his face onto the video. PROPECK questioned why I was wasting my time with  
27  
28

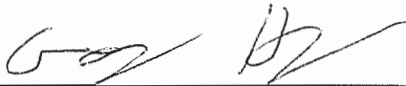
1 this case. PROPECK stated there is currently a court case to make base jumping legal in  
2 Yosemite.

3  
4 16. There is no evidence to suggest that AI was used to make or alter the video. The video is also  
5 consistent with other videos PROPECK has posted on his Instagram account of him BASE  
6 jumping.

7  
8 CONCLUSION

9 Based on the forgoing facts of this affidavit, I believe probable cause exists for the issuance of a  
10 summons to appear for Jack Matthew Propeck for using a parachute to deliver a person within  
11 Yosemite National Park.

12 Respectfully submitted,

13  
14  
15 

16 \_\_\_\_\_  
17 Cody Hays  
18 United States Park Ranger  
19 National Park Service  
20 December 8<sup>th</sup> 2025

21  
22 Sworn to me in accordance with Fed.R.Crim.P. 4.1:

23  
24 

25 \_\_\_\_\_  
26 The Honorable Helena M. Barch-Kuchta  
27 United States Magistrate Judge  
28 December 12, 2025

1 Approved as to form by:

2 

3 Briana M. Vollmer

4 Acting Law Enforcement Specialist

5 December 9, 2025