JASON M. FRIERSON 1 United States Attorney District of Nevada 2 Nevada Bar No. 7709 3 SKYLER PEARSON Assistant United States Attorney 501 Las Vegas Boulevard South, Suite 1100 4 Las Vegas, Nevada 89101 5 Tel: (702) 388-6336 skyler.pearson@usdoj.gov 6 7 8 9 Plaintiff, 10 ٧. 11 MARK KING. 12 Defendant. 13

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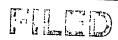
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US DISTRICT COURT DISTRICT NEVADA

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA, CRIMINAL COMPLAINT Case No. 2:25-mj-00012-NJK **VIOLATIONS:** 16 U.S.C. § 1338(a)(3) – Maliciously cause the death or harassment of any wild free-roaming horse or burro 18 U.S.C. § 47(a) – Whoever uses an aircraft or a motor vehicle to hunt, for the purpose of capturing or killing, any wild unbranded horse, mare, colt, or burro running at large on any of the public land or ranges BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned complainant, being first duly sworn, states that: **COUNT ONE** 16 U.S.C. § 1338(a)(3) On or about January 21, 2020, in the State and Federal District of Nevada, within federal public lands administered by the Bureau of Land Management, MARK KING, defendant herein, maliciously shot and killed a wild free-roaming burro, in violation of 16 U.S.C. § 1338(a)(3).

COUNT TWO 18 U.S.C. § 47(a)

On or about January 21, 2020, in the State and Federal District of Nevada, within federal public lands administered by the Bureau of Land Management,

MARK KING,

defendant herein, used a vehicle for the purpose of killing a wild burro on public lands, in violation of 18 U.S.C. § 47(a).

PROBABLE CAUSE AFFIDAVIT

Your Complainant, David J. Stolts, as a Special Agent with the Bureau of Land Management, states the following as and for probable cause:

- 1. I am "an investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7), empowered by law to conduct investigations and make arrests for offenses enumerated in Section 2516 of Title 18. I have been employed as a law enforcement officer and currently Special Agent with the Bureau of Land Management, Clark County, Nevada, since 2009.
- 2. As part of my duties, I investigate criminal violations of law on federal public lands. Through my employment as a Special Agent with the Bureau of Land Management, I have received specialized training in the enforcement of federal laws. My training and experience include, among other things, investigating the death or harassment of wild free-roaming burros in compliance with the Wild Free-Roaming Horses and Burros Act.
- 3. The following information used to support this Complaint was derived from reports of information obtained from investigations conducted by law enforcement related to the incident or my own personal investigation.

4. This Complaint contains information necessary to support probable cause to believe that the criminal offenses described herein were committed by the defendant, MARK KING and is not intended to include each and every fact and matter observed or known by me. Moreover, to the extent that this Complaint contains statements by witnesses, those statements are set forth only in part and in substance and are intended to accurately convey the information, but not to be verbatim recitations.

FACTS ESTABLISHING PROBABLE CAUSE

- 5. On October 18, 2024, San Bernardino County District Attorney Senior Investigator Ryan Arthurton provided information to BLM regarding the hunting and killing of a wild burro near Lake Mead National Recreation Area, Clark County, Nevada.
- 6. On December 5, 2024, I met with Investigator Ryan Arthurton who provided video, photographs, GPS data, and other pertinent information recovered from a cellular telephone during the course of a separate investigation, as to the crimes described herein. I reviewed the video, photographs, and the metadata associated with the video and photographs and concluded that MARK KING was pictured with a scoped rifle alongside a dying burro. Another video, taken with MARK KING's phone, showed a handgun on the lower left corner, directly in front of the phone, shooting at a dying burro (Screenshot D). The photograph below depicts MARK KING smiling alongside a dead burro with a scoped rifle (Screenshot A).

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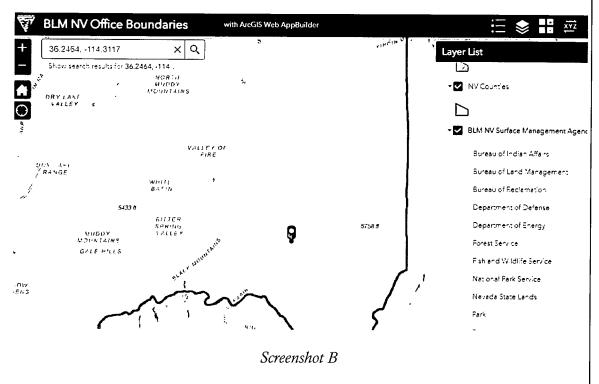
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Screenshot A

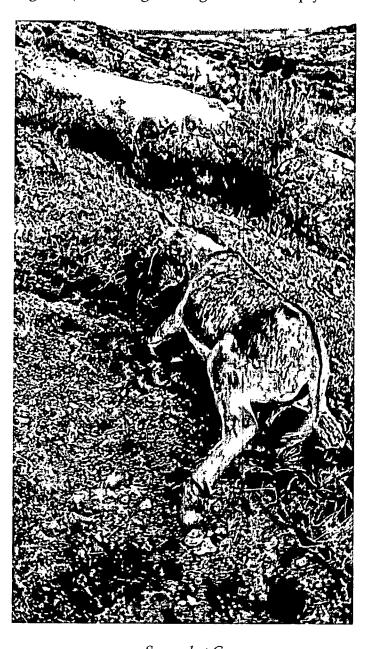
7. I reviewed photographs and their metadata, which placed MARK KING alongside the dead burro. Metadata within the photo indicates the photograph was taken at or near GPS coordinates 36.2464, -114.3117. Those coordinates place the location within public lands administered by the Bureau of Land Management as shown below (Screenshot B).



- 8. On December 10, 2024, Investigator Arthurton sent me videos, secure links, and digital paperwork regarding **MARK KING** and vehicles registered in his name.

 I reviewed those materials and found that a blue Ford truck bearing California license 97040R2 is registered to **MARK KING**.
- 9. A blue Ford truck along with a blue Toyota truck are pictured in the background of photograph (*Screenshot A*). The depicted vehicles have distinctive red and white graphics on them as can be seen in the picture. The video depicted a driver and passenger driving around public lands, gesturing toward wildlife, including cattle and burros. Both types of animals were subsequently shot, killed. The killings were recorded on **MARK KING's** phone.
- 10. I reviewed videos that depicted individuals driving through the desert, shooting, and killing a burro and several head of cattle. While the videos do not depict the firing of a black, scoped rifle shown in the picture set forth above as *Screenshot A*, they do show a handgun being fired multiple times at a burro lying in a pool of blood, struggling to

stand (*Screenshot C*). I observed the handgun being fired 13 times on the videos. At one point on the videos, I saw the handgun firing directly next to the phone (*Screenshot D*) with the handgun's slide locking back, indicating the magazine was empty.



Screenshot C



 $Screenshot\ D$

CONCLUSION

12. Based upon the information set forth in this application, I respectfully submit that there is probable cause to believe that **MARK KING** violated 16 U.S.C. § 1338(a)(3) and 18 U.S.C. § 47(a).

DÁVID J. STOLTS,

Special Agent

Bureau of Land Management

SUBSCRIBED and SWORN to before me

this $\frac{7b}{}$ day of January 2025.

HONORABLE NANCY J. KOPPE

UNITED STATES MAGISTRATE JUDGE