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7 **UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

8 **UNITED STATES OF AMERICA,**

**CRIMINAL COMPLAINT**

9 Plaintiff,

Case No. 2:25-mj-00012-NJK

10 v.

VIOLATIONS:

11 **MARK KING,**

16 U.S.C. § 1338(a)(3) – Maliciously cause the death or harassment of any wild free-roaming horse or burro

12 Defendant.

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

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16 BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned  
17 complainant, being first duly sworn, states that:

18 **COUNT ONE**  
19 16 U.S.C. § 1338(a)(3)

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

22 **MARK KING,**

23 defendant herein, maliciously shot and killed a wild free-roaming burro, in violation of 16  
24 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**

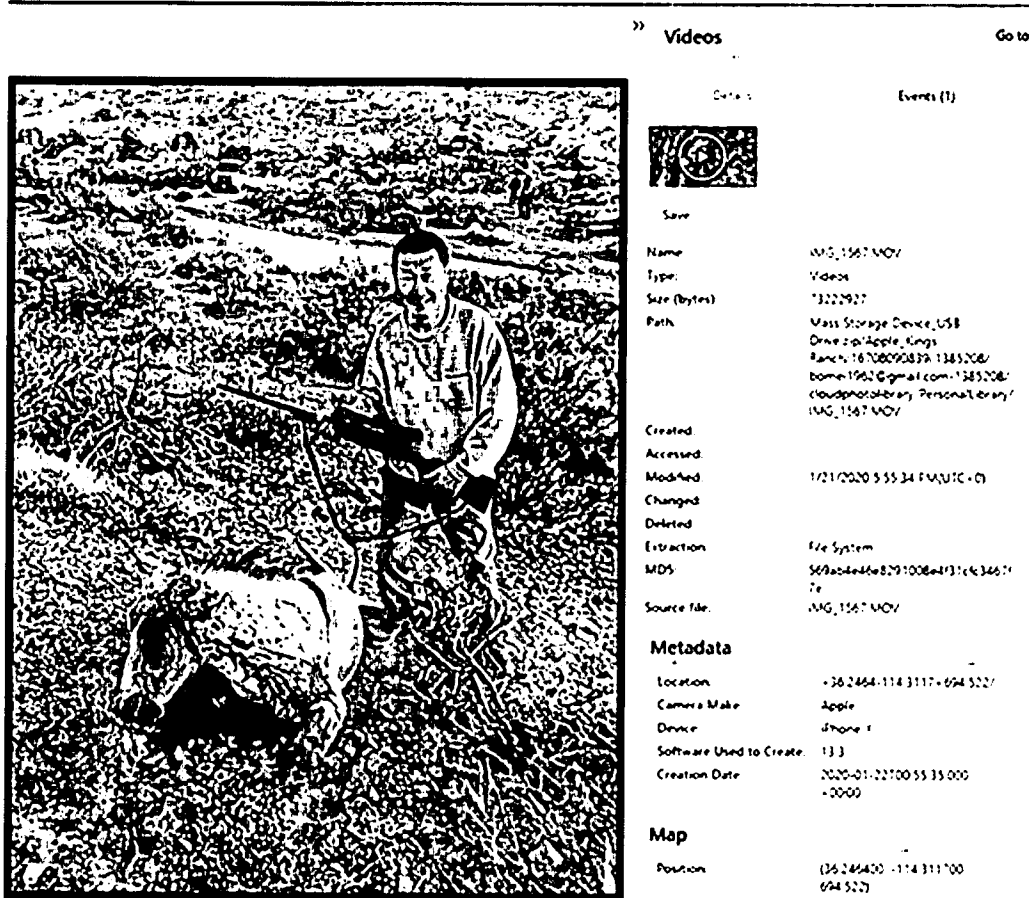
Your Complainant, David J. Stolts, as a Special Agent with the Bureau of Land  
Management, states the following as and for probable cause:

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.

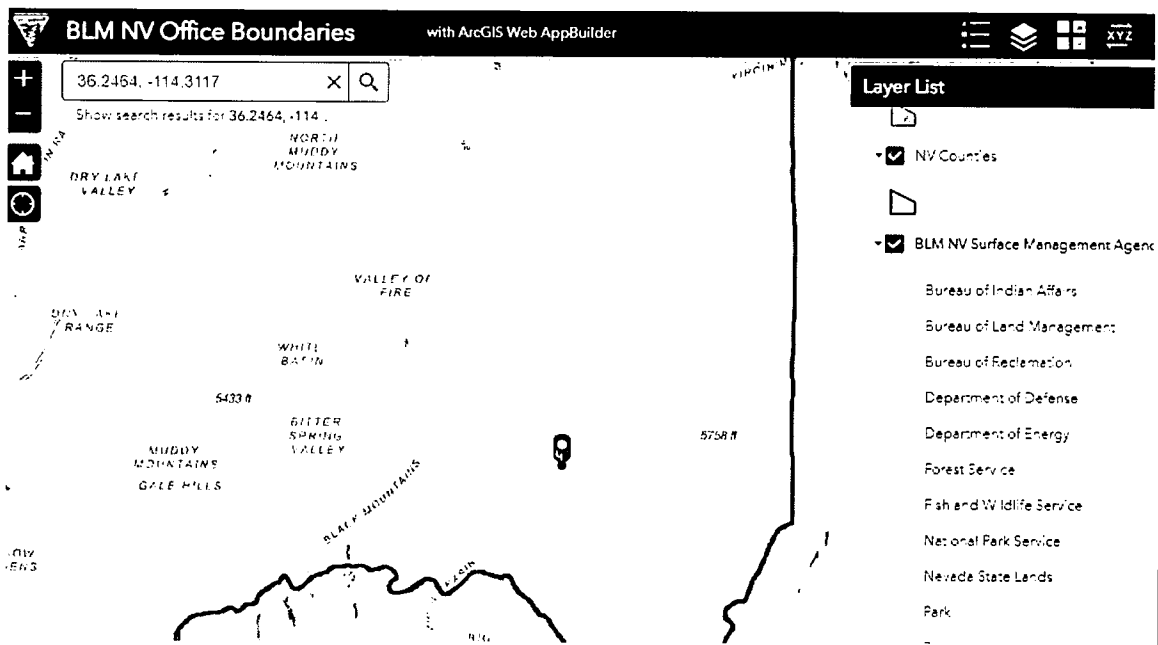
3. The following information used to support this Complaint was derived from  
reports of information obtained from investigations conducted by law enforcement related  
to the incident or my own personal investigation.





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).



*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

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



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*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).



DAVID J. STOLTS,  
Special Agent  
Bureau of Land Management

SUBSCRIBED and SWORN to before me  
this 7th day of January 2025.



HONORABLE NANCY J. KOPPE  
UNITED STATES MAGISTRATE JUDGE