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COUNT ONE

That on or about March 18, 2025, in the District of Nevada,

PAUL HYON KIM,

Possessed a firearm¹ which was not registered to him in the National Firearms Registration and Transfer Record, in violation of 26 U.S.C. § 5861(d); and

COUNT TWO

That on or about March 18, 2025, in the District of Nevada,

PAUL HYON KIM,

Maliciously damaged and destroyed and attempted to damage and destroy by means of fire and an explosive, any building, vehicle, or other real or personal property used in interstate or foreign commerce or in any activity affecting interstate or foreign commerce, to wit, five Tesla vehicles, in violation of 18 U.S.C. § 844(i).

Complainant, Special Agent Steven Arthur Baxter, states the following as and for probable cause:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with Federal Bureau of Investigation (FBI) and have been since October, 2012. My current assignment is to the Las Vegas Field Office. My training includes the New Agent's training curriculum at the FBI Academy in Quantico, VA, as well as specialized training in improvised explosive devices at the FBI's Hazardous Devices School at Redstone

¹ Title 26, United States Code, Section 5845(a)(8) defines the term "firearm" to include a "destructive device."

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Arsenal, AL. I have participated in investigations involving domestic terrorism and anti-government violent extremists, as well as investigations involving the manufacture, use, or attempted use of destructive devices, as well as arson related investigations.

- 2. I submit this affidavit in support of a criminal complaint and arrest warrant for Paul Hyon Kim (hereafter "Kim") (DOB: 09/06/1988). I submit that there is probable cause to believe Kim has committed the crimes of Unlawful Possession of an Unregistered Firearm (Destructive Device), in violation of Title 26, United States Code Section 5861(d), and Arson, in violation of Title 18, United States Code Section 844(i) on March 18, 2025, hereinafter the "Target Offenses".
- 3. The facts and information contained in this affidavit are based upon my direct participation in this investigation and based upon facts as relayed to me by other law enforcement officers pertaining to this investigation. This affidavit is submitted for the limited purpose of establishing probable cause for the charged offenses. As a result, I have not included each and every fact known to me regarding this matter.

PROBABLE CAUSE

Arson March 18, 2025:

- 4. On March 18, 2025, at approximately 0245 hours (0945 hours UTC), Las Vegas Metro Police Department (LVMPD) patrol officers from the Spring Valley Area Command (SVAC) were dispatched to Tesla Collision (6260 West Badura Avenue, Las Vegas, NV 89118), regarding a 9-1-1 call.
- 5. The person reporting advised 9-1-1 that a male across the street (at Tesla Collision) was setting vehicles on fire. The caller also heard gunshots while he was on the phone with 9-1-1 and witnessed the suspect run eastbound on Badura Avenue. The suspect was described as an unknown race male, wearing a black hoodie, black pants, and carrying a black backpack.





- 6. Clark County Fire Department (CCFD) Engine #21 arrived to suppress the fires and did so without incident or further damage to surrounding vehicles and structures. After the fires were suppressed, the following vehicles were determined to have damage from fires and/or apparent bullet hole(s) from a discharged firearm:
 - 2025 black Tesla Model Y, Vehicle Identification Number (VIN):
 7SAYGDEF4SF247757, bearing Nevada license plate 60J237 (hereinafter "Vehicle 1")
 - 2023 white Tesla Model 3, VIN: 5YJ3E1EA7PF712426, bearing Nevada license plate GK04FN (hereinafter "Vehicle 2")
 - 2023 gray Tesla Model X, VIN: 7SAXCBE62PF383520, bearing Nevada license plate J4M4L (hereinafter "Vehicle 3")
 - 2021 white Tesla Model 3, VIN: 5YJ3E1EAXMF090657 (hereinafter "Vehicle 4")
 - Gray Tesla Model 3, VIN: 5YJ3E1EA2SF899535 (hereinafter "Vehicle 5")

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7. Vehicle 1 still contained a device that resembles an incendiary device, similar to a Molotov cocktail,2 inside of the vehicle that had not been ignited. The device contained an unknown flammable substance, later identified by the Las Vegas Metropolitan Police Department (LVMPD) Lab Unit as Pentene and Ethanol, in a glass bottle.

8. Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") Destructive Device Examiner Jeremiah Raemhild reviewed images of one (1) of the in-tact devices located on scene inside one of the damaged Tesla vehicles. ATF Destructive Device Examiner Raemhild stated,

Based upon the provided information this device possesses the construction and characteristics of a destructive device and would be properly identified as an Incendiary Bomb as that term is defined in 26 U.S.C, Section 5845(f). Additionally, this would also be an explosive as defined under 18 USC 844(j). This is a preliminary determination only pending the receipt of the physical evidence and the associated laboratory report.

The images below depict the device recovered and reviewed:

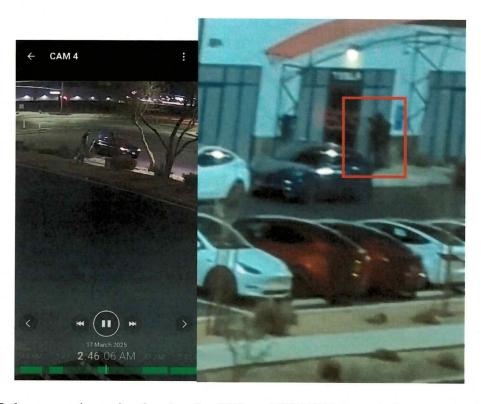


² Based on my training and experience, a Molotov cocktail is a hand-thrown incendiary weapon consisting of a frangible container filled with flammable substances and equipped with a fuse. These incendiary devices are typically a glass bottle filled with flammable liquids, such as gasoline, sealed with a cloth wick. When used, the wick is lit, and then the device is thrown. The container will shatter on impact, and the flammable substance will then catch fire. The fire typically spreads as the fuel burns.

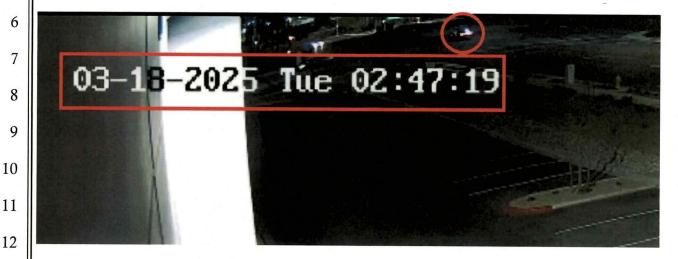
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Video Surveillance with audio recording from 6308 Pear Valley Lane, a structure that 9. abuts Badura Avenue across from Tesla Collision, revealed that an unknown subject wearing all dark clothing entered the parking lot of Tesla Collison on March 18, 2025, at approximately 0243 hours. The unknown subject lifted his or her hand in the direction of a Tesla vehicle, then three (3) gunshots were heard being discharged from what law enforcement officials believe to be a firearm. After two (2) of the gunshots, a fire was seen burning in two (2) of the Tesla vehicles, both of which were then engulfed in flames. The video revealed the suspect arrived in a dark colored vehicle which travelled west on Badura from the intersection of Jones and Badura. Initial investigation revealed that incendiary device(s) were used to damage and destroy multiple vehicles, a firearm was used to damage and destroy the vehicles, and a graffiti implement was used to write the word "Resist" on the front of the Tesla Collision building. Detectives from the Southern Nevada Counterterrorism Center (SNCTC), FBI Joint Terrorism Task Force (JTTF) and Las Vegas Metropolitan Police Department (LVMPD) ARMOR (All-Hazard Regional Multi-Agency Operations and Response) unit, as well as CCFD Arson Investigators responded to the scene to assume the investigation.



10. Subsequent investigation by the FBI and LVMPD included canvasses for surveillance photography obtained by private residences and businesses as well as investigators legally obtaining cellular telephone tower data for the area of the incident on the evening of March 17 to March 18, 2025. Knowing the suspect entered a vehicle that was traveling east towards Jones Avenue after the crime, investigators canvased the property of 6955 South Jones Boulevard, Las Vegas. This property is on the corner of Jones Boulevard and Badura Avenue. It has entries and exits on both streets. Surveillance footage on the southwest side of the property was located. This camera is pointed to the south, which captures east and west traffic on Badura Avenue, west of Jones Boulevard. Time stamped at 0247:13 hours, a black newer sedan approached the intersection of Jones Boulevard. This vehicle had a solid LED light strip that encompassed the entire rear facie. The vehicle appeared to disregard the red light, and continued east on Badura Avenue and crossing Jones Boulevard.



11. Investigators used this footage to establish a possible path of travel for the vehicle. The subject's vehicle description was described as a newer black sedan with solid LED taillights that encompassed the rear facie, and no tint. It should be noted that not all time-stamped data may be accurate to actual time. Different businesses utilize different devices/methods, such as hard wire or Wi-Fi, which contribute to certain delays. The following footage was located of the possible vehicle direction:

FOOTAGE LOCATED ON 03/18/2025:

- 11..i. LVMPD CSI southbound on Lindell from Badura at 2:47:45.
- 11..ii. NV Energy (7155 South Lindell Road) vehicle traveled south on Lindell Road at 2:48:08.

11..iii. LVMPD CSI – vehicle turned east on Warm Springs Road from Lindell Road at 02:48:33.

• FOOTAGE LOCATED ON 03/19/2025:

11..i. 6955 South Jones Boulevard – camera facing north. At approximately 0236 hours, a dark colored sedan traveled southbound from the CC 215 highway area. The vehicle slowed down as it approached Badura Avenue and merged close to the west sidewalk. The vehicle's lights were turned off but the vehicle's right blinker was activated, signaling its intention to turn right (west). This was visible due to all lights noticeably turning off, with the passenger headlight and taillight flashing, with a flash where the passenger mirror would be. Newer vehicles are known to have turn signal lamps on the side mirrors.



11..ii. Additionally, there was a camera on the same property that was on the southeast corner of the building. This camera faces south, southwest, which captures traffic on Badura Avenue west of Jones Boulevard, and small portions of traffic on Jones Boulevard, south of Badura Avenue. At approximately 02:37:20, the apparent same black vehicle was seen entering onto Badura Avenue westbound from northbound Jones Boulevard. It also showed the passenger side turn signals still active as the light was on at the passenger mirror and headlamp. The turn signal turned off, and the daytime running lamps turned on, which further proves the turn signal was activated. The vehicle traveled west on Badura Avenue towards the Tesla Collision center.







suspect vehicle.

11..iii. 6515 South Jones Boulevard - the subject's vehicle was observed traveling west

on Sunset Road and entering the parking lot of Tropical Smoothie Café and

Sierra Gold. The vehicle departed the property southbound on Jones Boulevard

at approximately 0235 hours. The distance from 6515 South Jones Boulevard to

the approximate location of where the vehicle was captured on video from 6955

South Jones Boulevard traveling south, was only 0.4 miles. While stationary in

the parking lot, detectives were able to get the clearest photo to date of the

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- 12. Based on this information, it is believed the subject was most likely driving a 2021-2025 Hyundai Elantra.
- On March 19, 2025, LVMPD completed a report, which examined the characteristics 13. of the rifling of the bullet fragments recovered on scene. In summary, this report indicates that the rounds fired at the cameras are 300 blackout or 30 caliber. A number of possible firearms are included in the report, but no specific firearm make or model could be identified.
- Additionally, the DNA report from the LVMPD Forensic Lab was completed. The 14. report indicated the following:

Primary Case #: 250300065142 Lab Case #: 25-04301.2

STR Processing

The evidence listed below was subjected to PCR amplification at the following STR genetic loci: TH01, D3S1358, vWA, D21S11, TPOX, DYS391, D1S1656, D12S391, SE33, D10S1248, D22S1045, D19S433, D8S1179, D2S1338, D2S441, D18S51, FGA, D16S539, CSF1PO, D13S317, D5S818, and D7S820. The sex-determining Amelogenin locus was also examined

Lab Item 3: swab from the staining from the side of the orange "NJLP" storm proof matches container Number of contributors: 1 male

The DNA profile obtained is consistent with a single unidentified male contributor (Male #1). No additional conclusions can be made regarding the contributor to this DNA profile at this time.

The DNA profile will be searched against the Local DNA Index System (CODIS) and then uploaded to the National DNA Index System (CODIS) for comparison. You will be notified of any match(es).

Lab Item 5: swab from the edges of the orange "NJLP" storm proof matches container

The DNA profile obtained is consistent with at least one male contributor. Due to the limited nature of this profile, it is

Lab Item 7: swab from the mouth and rim of the bottle inside vehicle 5 (2025 Tesla NV60J237) A DNA profile was not obtained

- 15. In addition to video surveillance canvas, LVMPD detectives authored numerous search warrants regarding area cellular tower information dumps. An area dump pulls data from a specific location and specific date/time frames authored in the warrant. This includes electronic devices, such as cell phones and most newer vehicles that have services like OnStar. Multiple search warrants were completed during the duration of this investigation, and served to Verizon, T-Mobile, and AT&T. The locations of the area dumps included the following known locations of the tracked suspect vehicle:
 - Location 1: 6260 West Badura Avenue
 - Location 2: Jones Boulevard/Badura Avenue
 - Location 3: Badura Avenue/Lindell Road
 - Location 4: Sunset Road/Jones Boulevard
 - Location 5: Sunset Road/Pecos
 - Location 6: Mountain Vista/Russell Road
- 16. One warrant return indicated that International Mobile Subscriber Identity number (IMSI), 311480798811960 was confirmed to have communicated with cell towers that place it at locations 2 and 4. It is known by Verizon as "Verizon Telematics Vehicle Monitoring". Detectives have learned that Hyundai vehicles equivalent to OnStar is a company called "BlueLink", which is a subsidiary of Verizon.
- 17. Based on this return, Detectives believed this IMSI number belonged to a vehicle, likely a Hyundai.
- 18. On March 25th, an LMVPD Analyst learned of potential license plate reader (LPR) scans at the intersection of Sunset Road and Eastern Avenue. The analyst reviewed one month worth of LPR analysis at that same intersection. While searching for black Hyundai Elantras, the analyst observed that the same black Hyundai Elantra had been captured at the intersection multiple times.

- The vehicle was consistent with our estimated model year (2021-2025). Additionally, the vehicle had matching rims and no tint.
- 19. The vehicle bore the license plate NV 687W46. It was captured at the intersection on 03/05/25, 03/07/25, and 03/12/25. The registered owner was identified as Paul Kim (09/06/1988). Kim's address was identified as 3950 Mountain Vista Street #296, Las Vegas, NV 89121. Kim's phone number was identified as (425) 502-0069. In two separate LVMPD reports, Kim's phone number was identified as (425) 502-0069 (LLV210900098345-001; LLV220900035959-001).
- 20. Verizon had provided an Area Dump Return for the intersection of Sunset Road and Pecos, Location 5. The return indicated that on March 18, 2025, at approximately 0204 hours, Kim's phone number was present in that area.
- 21. On March 18, 2025, at approximately 0530 hours (less than 3 hours after the incident) a subject identified as Paul Kim, DOB: September 06, 1988, filed an insurance claim with his insurance company claiming his vehicle tires had been slashed. Kim also advised that his vehicle was stolen in his reporting to the tow company and that he had just recovered it. A query of LVMPD, and Henderson reports did not show any reports by Kim that his vehicle had been stolen or recovered.
- 22. Kim is the registered owner of a black 2023 Hyundai Elantra bearing VIN# KMHLN4AJ2PU035683. This fits the year/make/model of the suspected vehicle used in the crime. Pictures of this particular vehicle match the characteristics (distinct rims, taillights, no tint, etc.) of the suspect vehicle which appears in numerous surveillance images captured.
- 23. On March 6, 2025, Kim took possession of a lower receiver for an AR-style firearm that is compatible with a .300 BLACKOUT upper receiver assembly (barrel, chamber, bolt carrier group). This is the same caliber of firearm used in the crime based on a LVMPD lab report analysis of bullet fragments recovered on scene. During this firearm transfer, Kim provided 425-502-0069 as

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his telephone number to Accuracy Gun Shop. Kim took possession of this firearm at Accuracy Gun Shop located at, 5903 Boulder Hwy, Las Vegas, Nevada 89122. Below are video stills recovered from Accuracy Gun Shop during the firearm transfer process:





24. On March 26, 2025, ATF Investigators conducted a query of the National Firearms Registration and Transfer Record (NFRTR) for Paul Kim (DOB: 09/06/1988). This query resulted in records showing Kim registered a 7.62 caliber suppressor on or about September 18, 2024, which was approved on or about October 15, 2024.

- 25. ATF Investigators reviewed video footage from the Tesla Facility depicting the suspect spray painting the storefront. Based on training and experience, ATF Investigators believe the suspect in the video footage appears to be carrying a firearm with a suppressor or similar muzzle device. Additionally, there was no visible muzzle flash seen during multiple rounds the suspect fired on scene.
- 26. According to a LVMPD Ballistic Analysis Lab report conducted on March 20, 2025, an analysis of one of the bullet fragments recovered on scene indicates the bullet caliber is .300 BLACKOUT (.30 caliber). The 7.62 suppressor Kim registered with ATF in September 2024 is a .30 caliber equivalent. The 7.62 cartridge is a NATO cartridge measured in millimeters (7.62mm) that is equivalent to a .300 BLACKOUT projectile diameter, which is measured in caliber, or tenths of an

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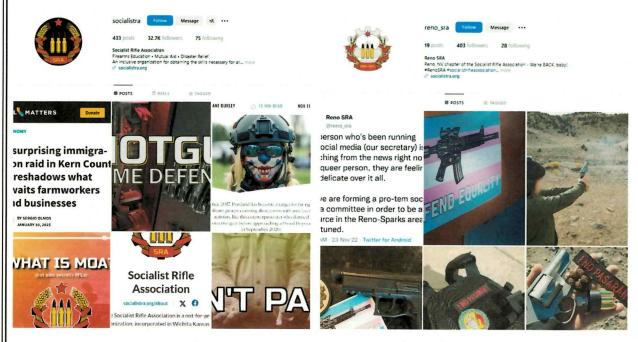
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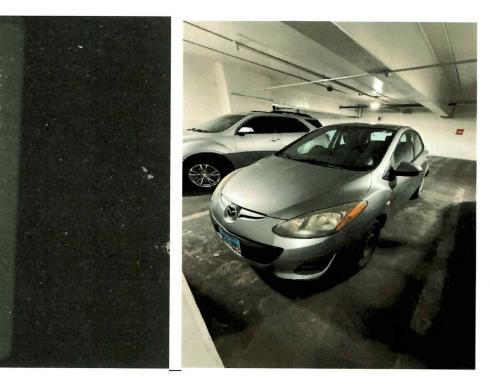
- inch (.30 caliber). This evidence demonstrates Kim had access to a suppressor and/or similar muzzle device that is seen in video footage of the suspect during the commission of the subject offenses. Furthermore, the suppressor Kim owns is compatible with a firearm chambered to expel the .300 BLACKOUT bullet fragments that were recovered on scene.
- 27. The incendiary device (mentioned and described earlier) was wrapped with Marketon flyers. Kim lives 1.8 miles from the Marketon located at 3736 East Desert Inn Road. The flyers were only distributed in a 3 miles radius of the Marketon location.
- 28. Kim has an Instagram page where he follows the Socialist Rifle Association's page. In a post from October 2018, on the Reno Socialist Rifle Association's Instagram page, is a picture of a subject that appears to be Paul Kim training with firearms.



29. Beginning on or about March 26, 2025, LMVPD conducted twenty-four hour surveillance on Kim at his residential address of 3925 Mountain Vista, Apartment #296, Las Vegas, Nevada 89121. His registered Hyundai Elantra had not been observed since the time of the incident.

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30. On March 26, 2025, at 0807 hours, Kim was seen leaving his apartment and carrying three black bags. Kim carried the bags to a silver Mazda 2, Nevada plate 411-8B5, VIN # JM1DE1KY7E0182024. Investigation into the vehicle revealed that it is a TURO rental vehicle, with the registered owner having the initials D.M. and a date of birth in December, 1981.



- 31. At 0853 hours, LVMPD observed Kim in the Venetian Hotel and Casino where there was a cyber security and AI convention currently going on. The vehicle was parked in the 5B section of the Venetian self-park garage located at, 3355 South Las Vegas Boulevard Las Vegas, Nevada 89109.
- 32. Kim had a confirmed flight to Phoenix from Las Vegas, leaving on March 27, 2025, at 0645 hours with a scheduled layover in Phoenix before leaving for Milwaukee, WI, with an arrival time of 1530 hours EDT

- 33. On March 26, 2025, at 1638 hours LVMPD Detectives consensually made contact with Kim who was leaving the Venetian Hotel and casino and was returning to his Mazda Turo Rental Vehicle.
- 34. Kim agreed to talk with Detectives and an interview was conducted. The Detectives read Kim his Miranda rights, read verbatim from the LVMPD issued blue Miranda Card at 1649 hours to which Kim replied, "yep." The following is a summation of the interview:
 - 34.1. Kim confirmed that the Black Elantra of question in this investigation was his and that the phone number 425-502-0069 was his phone number.
 - 34.2. Kim explained his day between the 17 and 18 March during the time period of our crime occurrence. Kim stated that he met with a friend at 2000 hours on the 17th at a PTs bar located on Flamingo only 10 minutes from his house. (There are no PTS on Flamingo within 10 minutes of Kim's residence).
 - 34.3. This was the first time that he has met with this friend, and they were together for two and a half hours and got a little drunk. So, they headed back to Kim's friend's house at midnight where they hung out until 0800 hours on the 18 March.
 - 34.4. Kim advised that his friend lived off of Maryland Parkway but was not specific. Kim parked his car on adjacent to the apartment complex that was on Maryland parkway and left his keys inside. When he went back to his car at 0800 hours on March 18, he noticed his car was damaged like someone tried to steal it.
 - 34.5. Kim admitted that he called in a claim to Progressive for the damage but that the damage was not covered by his specific insurance.
 - 34.6. Detectives knew that the actual reporting for the claim was 0500 hours for slashed tires per Progressive reporting.

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- 34.7. When asked where Kim made the insurance report stating on Silverado Ranch, Kim confirmed that it was in fact Silverado Ranch which is shown in the above phone and car tracking.
- 34.8. Kim then advised that he took his Elantra to the Caliber Collision Center on his own to be repaired. Kim confirmed that his car was not anywhere else during the 17th and 18th of March.
- 34.9. Detectives challenged Kim on his inconsistences and Kim then replied with his request for counsel and the interview was concluded.
- 34.10. Law enforcement officials have determined that Kim's vehicle and phone followed the following path on March 18, 2025:

At approximately 0204 hours Kim's phone (425-502-0069) and his vehicle appeared to be together utilizing the same tower just east of Tropicana and the 95. Kim's phone utilized this tower at approximately 0204 hours, and his vehicle was in the same area from approximately 0203-0210. Kim's vehicle was then in the area of S. Jones/Sunset at approximately 0232-0235 hours. Then between approximately 0236-0248 the vehicle appears to be in the area of 6260 W. Badura. At approximately 0254 hours both Kim's vehicle and cell phone again appear to be together utilizing a tower in the area north of Blue Diamond Rd. and Interstate 15.

- 35. In the late hours of March 26, to the early morning hours of March 27, 2025, law enforcement officials executed various state search warrants related to this case, including at Kim's residence: 3950 South Mountain Vista Road, Building Y Apartment 296, Las Vegas, Clark County Nevada. Law enforcement officials recovered the following items from inside of Kim's residence:
 - black gun belt with pouch and a small drop of pink paint residue.

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- black backpack with pink paint
- black hoodie
- face masks
- potassium chlorate (oxidizer)
- grey magazine carrier
- black tape
- additional multiple black hoodies and clothing
- Newspaper article from USA Today dated 11/08/17 about a mass shooting incident
- Notepads, handwritten documents
- Ammunition in multiple calibers
- Holsters
- Miscellaneous gun parts
- Cartridge catcher
- 300 blackout ammo in bedroom
- Firearms
- 300 blackout barrel
- AR style rifle with Palmetto lower receiver serial number SCNL242328. This rifle is consistent with the firearm used in the March 18, 2025 incident at Tesla Collision and it has a Sandman k 7.62 suppressor on it.
- 9mm handgun with magazines
- Bolt action rifle with scope
- 5.45x39 AK style rifle

1 • shotgun

• Paper with what is believed to be a handwritten egress route from Tesla on Badura.

CONCLUSION

36. Based on the foregoing, I have probable cause to believe Paul Hyon **Kim** (DOB: 09/06/1988) committed the **Target Offenses**.

STEVEN ARTHUR BAXTER FBI SPECIAL AGENT

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone or other reliable means on this <u>27th</u> day of March, 2025.

THE HONORABLE ELAYNA J. YOUCHAH UNITED STATES MAGISTRATE JUDGE