

AO 91 (Rev. 11/11) Criminal Complaint

United States Courts

Southern District of Texas

FILED

February 09, 2026

## UNITED STATES DISTRICT COURT

for the

Western District of Texas

Nathan Ochsner, Clerk of Court

United States of America

v.

Johnathan Eugene BOONE (1) and  
Mariah Lynn BOONE (2)

SEALED

Case No.

PE: 26-MJ-29

4:26-mj-102

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 January 23, 2026 in the county of Ward in the  
Western District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 2251(b)&(e)	Certain activities relating to material involving the sexual exploitation of minors

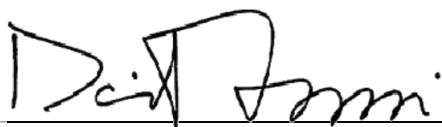
This criminal complaint is based on these facts:

X  Continued on the attached sheet.

**GABRIELLE A KENDALL** Digitally signed by  
GABRIELLE A KENDALL  
Date: 2026.02.04  
14:58:42 -06'00'

*Complainant's signature*

Gabrielle Kendall, HSI Special Agent

*Printed name and title*Complaint sworn to telephonically and signed electronically on this date.  
FED.R.CRIM.P. 4.1(b)(2)(A)

*Judge's signature*Date: 02/04/2026

David Fannin, United States Magistrate Judge

*Printed name and title*City and state: Pecos, Texas

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
Pecos Division

I, Gabrielle Kendall, being duly sworn, depose and state as follows:

PROBABLE CAUSE

On January 23, 2026, the Ward County Sheriff's Office (WCSO) received information regarding the sexual exploitation of a minor. The report alleged that a 15-year-old, Minor Female Victim (MV1), was being sexually exploited and abused by her biological mother, Mariah Lynn BOONE and her stepfather, Johnathan Eugene BOONE. MV1 Also stated that her mother and stepfather would take turns recording while the other was performing sexual acts on MV1.

On January 23, 2026, at approximately 3:47 PM, HSI Alpine acquired a Telephonic Search Warrant with The Honorable David B. Fannin. HSI Alpine seized MV1's device to conduct a forensic examination of said device. On the same date, HSI Alpine Special Agents (SAs) also sat down with MV1, to conduct an interview based on information received from WCSO. MV1 advised HSI Alpine SAs that both Mariah and Johnathan BOONE had been sexually assaulting her since she was 12 years old. During the interview, MV1 confirmed that both Mariah Lynn BOONE and Johnathan Eugene BOONE would request sexual acts via cellular phone text messaging and Instant messaging on Facebook messenger. MV1 stated that both Mr. and Mrs. BOONE made her delete the messages after the sexual abuse happened. MV1 also confirmed that each parent would record the act with their respective cellular devices.

Following a brief manual review of MV1's cellular device, HSI Alpine found screenshots of text messages between MV1 and Mariah Lynn BOONE as well as MV1 and Johnathan Eugene BOONE. The messages contained sexual language describing sexual acts involving MV1. A message indicated purchasing a vehicle for MV1's birthday. However, to receive the vehicle, Mariah and Johnathan BOONE requested MV1 to perform sexual acts on them both. MV1 messaged Mr. BOONE that she doesn't want the car that bad and Mr. BOONE advised that it was

MV1's choice. Also, Mr. BOONE requested sexually explicit photographs from MV1 and advised that he would do anything to get them. Mrs. BOONE sent MV1 a sexually explicit picture to elicit a response from MV1. MV1 asked Mrs. BOONE why the requests always have to be sexual and Mrs. BOONE advised that they will talk privately and in person when she got home.

#### CONCLUSION

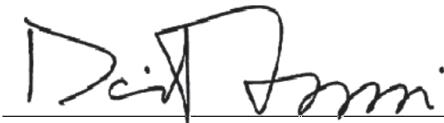
Based on the facts and circumstances stated above, I submit that there is probable cause to issue an arrest warrant for Mariah Lynn BOONE and Johnathan Eugene BOONE for violations of Title 18, United States Code, Section § 2251.

I declare under penalty of perjury the foregoing is true and correct to the best of my knowledge and belief.

**GABRIELLE A  
KENDALL**

 Digitally signed by  
GABRIELLE A KENDALL  
Date: 2026.02.04 14:59:38  
-06'00'

Gabrielle Kendall  
Special Agent  
Homeland Security Investigations



The Honorable David B. Fannin  
United States Magistrate Judge  
Western District of Texas (Pecos Division)