

RYAN G. WELDON
Assistant U.S. Attorney
U.S. Attorney's Office
P.O. Box 8329
Missoula, MT 59807
101 E. Front, Suite 401
Missoula, MT 59802
Phone: (406) 829-3335
FAX: (406) 542-1476
E-mail: Ryan.Weldon@usdoj.gov

**ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION**

UNITED STATES OF AMERICA,	MJ-22-<u>05</u>-M-<u>KLD</u>
Plaintiff,	INFORMATION
vs.	UNLAWFUL TAKING OF A THREATENED SPECIES
KEVIN MOLL,	Title 16 U.S.C. §§ 1538(a)(1)(G) and 1540(b)(1) and 50 C.F.R. § 17.40(b)(1)(i)(A)
Defendant.	(Penalty: Six months imprisonment and \$25,000 fine)

THE UNITED STATES ATTORNEY CHARGES:

That on or about September 26, 2018, near Charlo, in the State and District of Montana, the defendant, KEVIN MOLL, knowingly and unlawfully took a grizzly bear (*Ursus arctos horribilis*), a threatened species, in violation of 16

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U.S.C. §§ 1538(a)(1)(G) and 1540(b)(1) and 50 C.F.R. § 17.40(b)(1)(i)(A).

DATED this 12th day of September, 2022.

JESSE A. LASLOVICH
United States Attorney



RYAN G. WELDON
Assistant U.S. Attorney

for JESSE A. LASLOVICH
United States Attorney

CYNDEE L. PETERSON
Criminal Chief Assistant U.S. Attorney

RYAN G. WELDON
Assistant U.S. Attorney
U.S. Attorney's Office
P.O. Box 8329
Missoula, MT 59807
101 E. Front, Suite 401
Missoula, MT 59802
Phone: (406) 542-8851
FAX: (406) 542-1476
E-mail: Ryan.Weldon@usdoj.gov

ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

UNITED STATES OF AMERICA, Plaintiff, vs. KEVIN MOLL, Defendant.	MJ 22- 05 -M- KLD AFFIDAVIT IN SUPPORT OF MOTION FOR PROBABLE CAUSE FOR INFORMATION
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1. I, Mona Iannelli, am a Special Agent with the U.S. Fish and Wildlife Service. I verify, under penalty of perjury, the following facts that I believe establish probable cause that Kevin Moll committed the crime of Unlawful Taking of a Threatened Species, in violation of 16 U.S.C. §§ 1538(a)(1)(G) and 1540(b)(1)

and 50 C.F.R. § 17.40(b)(1)(i)(A).

2. On September 26, 2018, a sow grizzly bear's collar went to "zero," indicating the grizzly bear was dead. An investigation ensued.

3. Biologists flew over the Perry Dairy in Charlo, Montana, attempting to identify the last known location of the collar. A few days later, law enforcement arrived on scene and found the deceased grizzly bear on a bone pile at the Perry Dairy. By the time law enforcement arrived, the collar and ear tag had been removed from the grizzly bear.

4. A photograph of the grizzly bear at the Perry Dairy in Charlo, Montana, is identified below:



5. When interviewed, Kevin Moll admitted he shot the grizzly bear sow from his vehicle, and he knew it was a grizzly prior to taking the shot. Moll shot the bear a second time in the neck. After walking up to the bear, Moll saw it had a

collar. Moll grabbed a front-end loader, picked up the grizzly, and dropped it on the bone pile located at the Perry Dairy.

6. Approximately two days later, Moll saw biologists searching for the grizzly bear from a helicopter. Moll admitted he returned to the grizzly he previously killed, cut the collar and ear tag off, and threw the collar and tag into Crow Creek.

7. Consistent with Moll's claim, law enforcement ultimately recovered the collar for the grizzly bear. Collar data showed the collar was ultimately removed from the bear, an individual transported the collar for 22 minutes, and the collar landed in the spillway of the Crow Creek Dam.

8. When asked if Moll knew that grizzlies were protected, Moll acknowledged he knew they were protected prior to pulling the trigger. Moll wanted to tell law enforcement about the shooting, but he was "scared" he would go to jail.

9. At no point did Moll have a permit to kill a grizzly bear from the United States Fish and Wildlife Service.

DATED this 7th day of September, 2022.



MONA IANNELLI
FWS Special Agent