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U.S. DISTRICT COURT

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DISTRICT OF UTAH
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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JARED EHLERS,

Defendant.

CASE NO.

INDICTMENT

VIOL. 16 U.S.C. § 470aaa-5, 18
U.S.C. §§ 641, 1361 and 1519,

Removal of Paleontological
Resources, Theft of Government
Property, Depredation of Government
Property, Destruction of Evidence

Case: 2:14cr00126
Assigned To : Kimball, Dale A.
Assign. Date : 3/12/2014
Description: USA v.

The Grand Jury charges:

COUNT 1

On or about February 17, 2014, in the Central Division of the District of Utah,

JARED EHLERS,

defendant herein, did knowingly excavate, remove, damage or otherwise alter or deface a paleontological resource, to wit: a three-toed dinosaur track, located on federal land, the value of which paleontological resource, together with the cost of restoration and repair of such resource, did exceed \$500, in violation of 16 U.S.C. § 470aaa-5(a)(1) and punishable pursuant to 16 U.S.C. § 470aaa(c).

COUNT 2

On or about February 17, 2014, in the Central Division of the District of Utah,
JARED EHLERS,
defendant herein, did wilfully and knowingly embezzle, steal, purloin and convert to his own use property of the United States with a value of more than \$1,000, to wit: one three-toed dinosaur print belonging to the United States, all in violation of 18 U.S.C. § 641.

COUNT 3

On or about February 17, 2014, in the Central Division of the District of Utah, on public lands of the United States administered by the U. S. Bureau of Land Management,
JARED EHLERS,
defendant herein, did willfully injure and commit depredation against property of the United States, by excavating, damaging, and otherwise altering paleontological resources; the damage to which property exceeds \$1,000.00, all in violation of 18 U.S.C. § 1361.

COUNT 4

On or about March 3, 2014, in the Central Division of the District of Utah,
JARED EHLERS,
defendant herein, did knowingly alter, destroy, mutilate, conceal or cover up a tangible object with the intent to impede, obstruct, or influence the investigation or proper

administration of a matter within the jurisdiction of the United States Bureau of Land Management, all in violation of 18 U.S.C. § 1519.

A TRUE BILL:

IS
Foreperson, Grand Jury

DAVID B. BARLOW
United States Attorney



RICHARD D. McKELVIE
Assistant United States Attorney