

Magistrate Judge Brian A. Tsuchida

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

v.

JOEL DAVID RIDLEY,
Defendant.

NO. MJ25-175

COMPLAINT for VIOLATIONS

Title 18, United States Code, Section
922(g)(1)

Title 16, United States Code, Section
668(a)

BEFORE, Brian A. Tsuchida, United States Magistrate Judge, U. S. Courthouse,
Seattle, Washington.

The undersigned Complainant, Anthony M. Larkin, a Special Agent for the
Federal Bureau of Investigation (FBI), being duly sworn states:

COUNT ONE

(Unlawful Possession of a Firearm)

On or about February 23, 2025, in Whatcom County, within the Western District
of Washington, JOEL RIDLEY, knowing he had been convicted of the following crime
punishable by a term of imprisonment exceeding one year:

i. *Assault in the First Degree*, in the Superior Court of Washington for Whatcom County, under case number 03-1-00621-7, on or about September 4, 2023;

did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is: a *Savage rifle*, that had been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

(Violation of the Bald and Golden Eagle Protection Act)

On or about February 23, 2025, in Whatcom County, within the Western District of Washington, JOEL RIDLEY, did knowingly and with wanton disregard for the consequences of his actions, and without being permitted by law to do so, took a bald eagle.

All in violation of Title 16, United States Code, Section 668(a).

COUNT THREE

(Violation of the Bald and Golden Eagle Protection Act)

On or about February 23, 2025, in Whatcom County, within the Western District of Washington, JOEL RIDLEY, did knowingly and with wanton disregard for the consequences of his actions, and without being permitted by law to do so, took, possessed, or transported a bald eagle.

All in violation of Title 16, United States Code, Section 668(a).

And the complainant states that this Complaint is based on the following information:

I, Anthony M. Larkin, being first duly sworn on oath, depose and say:

INTRODUCTION AND OFFICER BACKGROUND

1 1. I am a Special Agent with the Federal Bureau of Investigation and have
2 been since April 23, 2023. I am currently assigned to the Bellingham Resident Agency of
3 the Seattle Division. My primary responsibilities as a Special Agent include
4 investigations involving fraud, drug trafficking, hate crimes, and violent crimes, with a
5 secondary responsibility of supporting investigations involving federal crimes on the
6 Indian reservations in Northwest Washington. In these investigations, I have dealt with
7 numerous extractions and analysis of subjects' digital devices, resulting in obtaining
8 information and evidence critical to those investigations.

9 2. I am an investigative law enforcement officer of the United States within
10 the meaning of Title 18, United States Code, Section 2510(7). As such, I am empowered
11 to investigate, and to make arrests for, violations of federal criminal statutes, including
12 those found in Title 18 and 16 of the United States Code.

13 3. Because this Affidavit is made based upon my personal knowledge,
14 training, experience and investigation, as well as upon information provided to me and
15 my review of reports prepared by other law enforcement personnel. This Affidavit is
16 made for the purpose of establishing probable cause for this Complaint and thus does not
17 include each and every fact known to me concerning this investigation.

18 **SUMMARY OF INVESTIGATION**

19 4. On the morning of February 23, 2025, officers from the Lummi Nation
20 Police Department (LNPD) responded to a report of an individual shooting eagles. The
21 reporting witness, V.L., whose full name is known to me, was located at 2200 block of
22 Lummi View Dr, Bellingham, WA, on the Lummi Nation Indian Reservation.

23 5. At the time of reporting, V.L was walking his dog across a field in the
24 Stommish Grounds on the Lummi Nation Indian Reservation when he observed an older
25 4-door gray sport utility vehicle (SUV) park along the roadway by V.L.'s driveway when
26 he heard a gunshot and saw a person standing on the sidewalk next to the vehicle. V.L.

1 walked back home and then heard a second shot. He saw the same vehicle approach and
2 watched as a person pick up an eagle from the ground. V.L. also saw the man standing
3 with the vehicle door open, looking up at another eagle in a tree that was located about
4 100 feet from V.L.'s residence. V.L. went back to his residence and called 911. While
5 V.L. was speaking to dispatch, he observed an eagle fall from the tree on his property.

6 6. En route to the call, an LNPd officer observed an unoccupied SUV parked
7 at the 2000 block of Lummi Shore Drive that matched the reporting party's description of
8 the vehicle associated with the person suspected of shooting eagles. The officer noted the
9 SUV had noticeable damage to the front bumper, ran the license plate and determined
10 that the vehicle was registered to RIDLEY. Upon contact, V.L. led the officer to an
11 obviously injured eagle. The officer captured the eagle and placed it in a box in his patrol
12 car. V.L. also confirmed that vehicle associated with the persons shooting eagles was a
13 silver or grey SUV with damage to the front bumper.

14 7. Shortly thereafter, another responding LNPd officer observed RIDLEY's
15 vehicle in motion driving toward him on Lummi Shore Road. Upon seeing the officer,
16 RIDLEY stopped in the middle of the road and abruptly turned into the driveway of 2085
17 Lummi Shore Drive and exited the vehicle. The officer spoke with RIDLEY who claimed
18 to have been swimming and denied hearing any gunshots. RIDLEY subsequently went
19 inside the residence. After a second officer arrived, they walked past RIDLEY's vehicle,
20 looked in the windows, and observed a dead eagle in the backseat

21 8. LNPd officers asked an unknown male at the scene where they could find
22 RIDLEY. The unknown male entered the residence and exited with RIDLEY. When
23 officers asked RIDLEY if he had been shooting eagles, he said he had not. RIDLEY was
24 placed in handcuffs, advised of his Miranda rights, and spoke with officers. Officers told
25 RIDLEY that a witness had identified him. They also advised him that they had observed
26 a dead eagle in his vehicle. When officers asked RIDLEY if he was part of a ceremonial
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1 group, he said that he was. The officer was aware that some religious ceremonies utilize
2 bald eagle feathers, providing RIDLEY with a motive to obtain eagle feathers. When the
3 officer asked RIDLEY if he had a permit to take bald eagles, RIDLEY responded that the
4 permit was "in his blood." Officers asked RIDLEY if he had a gun in his car, and
5 RIDLEY said that he did. Concerning the firearm, RIDLEY told the officer that this
6 would be a "life sentence" for him.

7 9. RIDLEY was arrested and booked into the Whatcom County jail.
8 RIDLEY's vehicle was seized and subsequently searched pursuant to a tribal search
9 warrant. During the execution of the search warrant, officers observed a black firearm
10 concealed between the rear seats near the dead eagle. The weapon was a 'Savage' rifle
11 bearing serial number 3524706. The rifle had one .22 caliber round in the chamber.

12 10. I have reviewed RIDLEY's criminal history and determined that he has a
13 felony conviction punishable by imprisonment for a term exceeding one year, which
14 federally prohibits him from possessing firearms:

15 *Assault in the First Degree*, in Whatcom County Superior Court, Washington,
16 dated on or about September 4, 2003, under cause number 03-1-00821-7.

17 11. According to the Judgment and Sentence entered in the 03-1-00821-7 case,
18 RIDLEY was sentenced on September 4, 2003, to 110 months in prison.

19 12. Following RIDLEY's arrest, LNPd transported the surviving and deceased
20 eagles to the Washington State Humane Society in Bellingham, WA. Based upon the
21 examinations conducted by veterinary staff, including x-rays, both eagles appeared to
22 have injuries consistent with a gunshot wounds. Despite veterinary staff's efforts, the
23 surviving eagle was deemed too injured to survive and was euthanized. Veterinary staff
24 also confirmed, based on their training and experience, that the two eagles that had been
25 shot were juvenile bald eagles.

26 13. According to the United States Department of Fish and Wildlife Office of
27 Law Enforcement, the Lummi Tribe of the Lummi Reservation is permitted to receive,

1 possess, distribute, and transport within the United States bald or golden eagles found
2 dead within Indian Country, as defined under 18 United States Code 1151. This permit
3 does not authorize locations other than identified above, nor does it authorize the take
4 (shoot, poison, capture, trap, disturb) of eagles from the wild by the tribe. Under no
5 circumstances may eagle remains, feathers, or parts be purchased, sold, traded, or
6 bartered. This permit was effective as of June 2, 2023.

7 INTERSTATE NEXUS OF FIREARM

8 14. As part of this investigation, I consulted with a Special Agent at the Bureau
9 of Alcohol, Tobacco, and Firearms (ATF) interstate nexus expert, who, based on their
10 training and experience, determined that the Savage rifle possessed by RIDLEY is a
11 “firearm” as defined by federal law and was not manufactured in the state of Washington
12 and thus traveled in interstate and/or foreign commerce, in order to be received or
13 possessed in the State of Washington.

14 15. I have confirmed that RIDLEY is an Indian: he has an Indian blood
15 quantum of 1/2 and is an enrolled member of the Lummi Tribe of the Lummi
16 Reservation, a federally recognized Indian tribe. I have also confirmed that the location
17 where the eagles were shot and the residence where RIDLEY was found to possess a
18 deceased eagle, occurred within the boundaries of the Lummi Indian Reservation.

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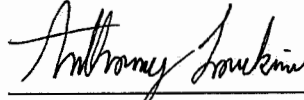
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CONCLUSION

16. Based on the foregoing, I respectfully submit that there is probable cause to believe that RIDLEY committed the aforementioned offenses.



Anthony Larkin, Complainant
Special Agent
Federal Bureau of Investigation

Based on the Complaint and Affidavit, sworn to me by telephone on this 28th day of March 2025, the Court hereby finds there is probable cause to believe the Defendant committed the offenses set forth in the Complaint.

Dated this 28 day of March 2025.



BRIAN A. TSUCHIDA
United States Magistrate Judge