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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	No. 3:19-cr-00143-SLG-MMS
)	
Plaintiff,)	UNITED STATES' SENTENCING
)	MEMORANDUM
vs.)	
)	
STEPHEN HICKS,)	
)	
Defendant.)	
_____)	

COMES NOW the United States of America, by and through undersigned counsel, and files with the court a sentencing memorandum as to defendant Stephen Hicks. Hicks' criminal activity in Alaska, which spanned at least five

hunting seasons and numerous illegally guided hunts, occurred irrespective of whether Hicks was guiding legally or illegally. Hicks' illegal activity demonstrates that he placed profit over professionalism, profit and income over guiding ethics and profit over hunting ethics. Because of these actions, the United States will urge the court to impose a term of imprisonment under the United States Sentencing Commission Guidelines, the sentencing factors under 18 U.S.C. § 3553 and, just as importantly, to protect Alaska's wildlife and communities from Stephen Hicks unsafe and unprofessional practices as a guide, hunter, and pilot. In previous rulings from the court regarding pretrial release, the court has determined that Hicks is a danger to the community through his impact to the legitimate market and documented history of unsafe and illegal guiding and flying practices. (*See*, Docket 40) As detailed in the Final Presentence Report, this investigation has proven Hicks is incapable and unwilling to conduct himself legally and ethically when it comes to guiding and hunting, all to the detriment of Alaska's wildlife and the professional guiding industry.

In addition to a term of imprisonment, the United States will also seek conditions of supervised release which are designed to prohibit the defendant from not only hunting any big game, worldwide, but to prevent him from manipulating and circumventing guiding and hunting rules which, as demonstrated, the defendant has done routinely and unapologetically for years.

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I. SUMMARY OF SENTENCING RECOMMENDATIONS

TERM OF IMPRISONMENT..... 18 Months
SUPERVISED RELEASE..... 3 Years, No Hunting/Field Condition
FINE\$50,000
RESTITUTION.....\$186,500
SPECIAL ASSESSMENT.....\$100.00
FORFEITURE Per Attachment A to the Plea Agreement

1. Hicks’ Illegal Guiding and Hunting Spree: October 2016, through November 2019.

As to the count of conviction, Hicks admitted to illegally guiding a client on BLM land in 2018. On this hunt, Hicks violated both state and federal laws in several ways: 1) by not being present with the client in the field as a guide when the client was hunting, as required by Alaska law, and 2) Hicks failed to obtain a permit from BLM to conduct guided, commercial activity on BLM land for this hunt. (see Dkt 75, pg 6). Additionally, when interviewed about this hunt and on numerous occasions, Hicks made false statements to investigators to conceal the illegal nature of his actions.

These agreed upon criminal acts are illustrative of Hicks disregard for the professional responsibility rules incumbent on big game guides in Alaska. In

addition to this hunt, Hicks knowingly broke the law in the following and by no means exclusive ways while acting unlawfully as a big game guide:

- by lying on his initial big game guiding license about previous criminal convictions,

- by guiding paying non-resident hunters without being licensed to do so and after his guiding license had been revoked,

- by guiding paying clients illegally on federal lands,

- by illegally guiding paying clients without a permit on State of Alaska Mental Health Trust lands,

- by concealing his illegal guiding activity by filing false paperwork with the state of Alaska,

- by using aircraft illegally to take big game “same day airborne” for paying clients,

- through the unlawful use of electronic communication devices to take big game for paying clients,

- by failing to supervise numerous clients while in the field who, themselves, committed illegal acts,

- by illegally taking brown bears over bait,

- by illegally taking an over limit of black bears, two bears in the same regulatory season,

-and the wanton waste of big game animals (bull moose) taken by paying clients.

At the sentencing hearing, the United States will present the court with 21 instances of illegal big game guiding, and related acts, committed by Hicks and spanning the 2015-2019 hunting seasons. In each of these hunts, Hicks would violate the law in more than one manner and all, save for one, in violation of the Lacey Act. At the sentencing hearing, the government will call two witnesses who will testify as to these violations. The testimony will be provided by a Special Agents of the U.S. Fish and Wildlife Service, who will testify as to illegal hunts relating to federal land, while an investigator from the Alaska State Troopers, Wildlife Investigative Unit will testify as to violations conducted by Hicks that are primarily state law violations, some of which have been charged by the state.

As to the recommendation for incarceration, the United States does not make this recommendation lightly. However, under the Section 3553 factors, and due to the defendant's multi-year wildlife crime spree, the defendant has placed himself in such a position. Had he not abandoned or ignored his legal, ethical, and professional responsibilities year after year, a sentence of imprisonment would not be in the offing. Here, Hicks' own choices place him in the position he finds himself today.

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2. The Five Seasons: Relevant Conduct and Hicks' Illegal 2015 to 2019 Guided Hunts.

Paragraphs 4 through 12 of the Final PSR summarize hunts guided by Hicks from 2015 through the 2019 hunting season and which form the basis for the government seeking inclusion of these hunts into the court's sentencing guideline calculations and section 3552(a) factors. The addition of these hunts and related acts increases the offense conduct calculation on order of at least eight (8) levels.

The United States will be ready to prove under U.S.S.G. Section 3B1.1 (a)(1)(A) and (B) (i)-(iii) and (a)(2) that Hicks' is accountable for this conduct as relevant conduct in that these actions are groupable, part of the same course of conduct and/or part of the same scheme or plan. (See U.S.S.G. § 3B1.1(a)(2)). The legal standard of proof, because inclusion of the entire amount of relevant conduct would raise the offense level by at least eight (8) levels, is the heightened clear and convincing standard. *United States v. Hymas*, 780 F.3d 1285, 1291 (9th Cir. 2015) (where non-plea relevant conduct had disproportionate effect on sentence, heightened standard of proof to be used)

At sentencing, agents will be prepared to testify with respect to paragraphs 4-12 of the Final PSR. With respect to these hunts, agents will testify that, as to

each hunt, their testimony will be based on and will rely on the following evidence, among others:

- Hunt Records and harvest reports filed by Hicks and his clients.
- Wildlife sealing records from the state of Alaska
- Client interviews
- Interviews with Hicks
- Photographic/video evidence
- Electronic communications between Hicks and his clients, in the form of emails, private messages, and public social media posts.
- Data from GPS trackers installed pursuant to tracker warrants

In addition to the foregoing, each agent will be testifying with aid of a PowerPoint presentation. The agents PowerPoint attached hereto as Exhibit 12. It is provided to the court and defense in advance of the hearing so that the court can review the PowerPoint in connection with this memorandum and the Final PSR. During the hearing, government counsel will examine each witness with respect to facts collected by the investigation, the evidentiary foundation for those facts, and the source of them with respect to establishing the illegal acts set forth in paragraphs 4-12 of the Final PSR.

When completed, the government anticipates that the adjusted offense level will be proven beyond the clear and convincing standard, thus the total value of the

illegal hunts performed by Hicks will be \$186,500, which includes the cost of the hunt for the count of conviction, \$15,500.

II. GUIDELINE APPLICATIONS

A. Application

The Guideline provisions for this offense would provide for an adjusted sentencing guideline range of 17, with a sentencing range of 24-30 months.

In addition, and based on the facts of the hunts, and other information obtained by the investigation, the parties will also be recommending a term of supervised release for three years, with a world-wide hunting ban, and no accompaniment of anyone in the field who is hunting, a fine of \$50,000. The fine range is an amount available under the guidelines, but below the statutory maximum of \$250,000. The court has discretion, under the section 3553 factors, to impose a fine range in that amount. At sentencing the government will ask the court to direct in the judgment that the fine be directed toward the Lacey Act Reward Fund.

B. Acceptance of Responsibility

As of this writing, and due to the plea agreement, the defendant is entitled to a three-point reduction for acceptance of responsibility. After contact by law enforcement the defendant immediately obtained counsel and an agreement was quickly structured. Mr. Hicks never considered a trial track for this as Hicks took

responsibility for the count of conviction, which the government wishes the court to recognize.

C. Criminal History Category Computation

The defendant's criminal record is Category 1.

III. APPLICATION OF 18 U.S.C. § 3553(a)

In addition to the Guidelines, the following sentencing factors set forth in 18 U.S.C. § 3553(a) apply with respect to the sentence to be imposed in this case: (1) the nature and circumstances of the offense and history and characteristics of the defendant; (2) the need for the sentence to reflect the seriousness of the offense, afford deterrence, protect the public from further crimes and provide the defendant training and treatment; (3) the kinds of sentences available; (4) the established Guidelines sentencing ranges; (5) any pertinent Guidelines policy statements; (6) the need to avoid unwarranted sentence disparity between defendants with similar records convicted of similar crimes; and (7) the need to provide restitution to victims of the offense. See, 18 U.S.C. § 3553(a)(1) through (7). Each sentencing factor is addressed in turn:

A. Nature and Circumstances of Offense and the History and Characteristics of the Defendant.

1. History and Characteristics of the Defendant – Unlawful Conduct

The defendant's criminal history is Category 1. However, the following guided hunts, as reflected in the PSR all amount to illegal and uncharged conduct.

PSR¶	Date	Species	Violation Description	Hunt Price
5	Aug-15	Sheep (Not Count 1)	Commercial operations without a permit, illegal take of sheep, false statements	\$15,500
71	Oct-16	Moose	Commercial operations without a permit, false records, moose hunt	\$6,000
7 (see footnote 2)	Oct-16	Moose	Commercial operations without a permit, false records	\$5,000
7 (see footnote 2)	Oct-16	Moose	Commercial operations without a permit, false records	\$5,000
7 (see footnote 2)	Oct-16	Moose	Commercial operations without a permit, false records	\$17,500
7	Oct-16	Brown Bear	Illegal take of brown bear over bait	\$10,000
8	Oct-17	Moose	Illegal take of moose attempt, same day airborne, use of electronic device	\$29,500
9	Oct-17	Moose	Illegal take of moose, same day airborne	\$20,000
9	Oct-17	Brown Bear	Illegal take of brown bear, no tag, no seal or report	\$1,000
8	Oct-17	Mountain Goat	Illegal take of mountain goat, attempt, no guide present	Captured above in Exhibit 11
9	Oct-17	Mountain Goat	Illegal take of mountain goat, attempt over limit take, no guide present	\$5,000

1 Hicks Guide License was placed on probation in Feb, 2016 for failing to provide clients hunting contracts before providing guiding services and failing to maintain safe and satisfactory field conditions. Hicks guide license was later revoked due to the hunts summarized in paragraph 8 of the PSR, as the hunters reported Hicks' activity to the state.

11 (see FN 3)2	May-19	Black Bear	Illegal take of black bear, over limit, false records	\$4,500
11 (see FN3)	May-19	Black Bear	Guiding after license revoked	\$5,500
12 (see footnote 3)	Sep-19	Two Moose	Illegal take of 2 moose, guiding after license revoked	\$12,000
9 (see footnote 3)	Oct-19	Moose, Brown Bear, Mountain Goat	Illegal take of moose and brown bear, guiding after license revoked	\$34,500
Count of Conviction BLM Hunt no Permit	Aug 2015	Sheep	No Permit (Count of conviction)	\$15,000
			Total Value of Illegal Sales	\$186,000

Photographs of each of these hunts are provided as Exhibits 1-11 at the conclusion of this brief.

2. The Instant Offense – The Count of Conviction

Count 1 –Illegal Guiding-Dall Sheep on BLM Land

The United States relies on the factual basis of the plea agreement for facts supporting the count of conviction. (See, Docket 75)

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2 The United States expects Hicks will argue that hunts listed after his guide license was revoked were not guided hunts, but were, instead, ‘buddy hunts’ or some of other type of nomenclative semantics designed to cover his illegal guiding activity. However, Hicks received payment, for these hunts, drew up contracts, accompanied hunters in the field and thus, per statutory definitions, he provided ‘big game hunting services.’ (see, pgs 4-6 of plea agreement). In addition, communications continued to be run through and social media posts promoted his guide service when his license to do so was revoked.

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B. Need for the Sentence to Reflect the Seriousness of the Offense, Afford Deterrence, Protect the Public, and Rehabilitate the Defendant.

The Significance of Wildlife to Alaska

This case began as a fraud, wherein Hicks failed to disclose on his guide application prior misdemeanor convictions. Since that time, Hicks' conduct has not changed. From 2015-2019 Hicks without fail ignored and disregarded the common sense, fair, and ethical regulations placed upon big game guides who hold a responsibility to uphold the law. His conduct reflects poorly on sport hunting, the big game guiding industry, and has an impact to the state's wildlife and legitimate guiding industry due to his combined illegal actions taken over many years.³

The hunting and viewing of wildlife is a significant component of the economic engine powering the state of Alaska's economy. Alaska, in so many ways, is the last best place. Certainly, the world's citizenry view Alaska through that lens, and many do so with their pocketbooks. In 2011, the year topic was last studied, residents and visitors spent \$3.4 billion in Alaska on wildlife, with those funds supporting local businesses, lodging, transport companies, retail stores, and providing salaries, employment and other commercial opportunities statewide. During that year, Alaska residents alone spent \$1 billion on hunting while visitors

to this state spent approximately \$150 million on hunting and \$1.2 billion on wildlife viewing. Spending on hunting and wildlife viewing in 2011, supported roughly 8% of Alaska's total economic output, 6% of its employment and provided \$343 million in revenue to state and local governments. By these figures alone, and without regard to wildlife's intrinsic value, wildlife is a significant business enterprise by any calculation and one of the most important draws to visitors near and far for a multitude of outdoor related activities.⁴

As to deterrence, the agencies entrusted to protect and defend the resources of Alaska face daunting obstacles with limited resources to cover a state of such geographical scale. There are no Fish and Wildlife Service Agents or Alaska Wildlife Troopers concealed behind every alder patch attempting to ensure compliance with state and federal hunting law, nor should there be. State law has delegated compliance with the law to the guide who is with the hunter in the field. Guides are obligated, by state law, to report any violations of law committed in their presence or by their employees. While most take that responsibility seriously, Hicks' conduct is at the far end of the spectrum. He illegally applied for a license and thereafter repeatedly and constantly violated the law in what appears

⁴ ECO Northwest. 2014. The Economic Importance of Alaska's Wildlife in 2011. Summary report to the Alaska Department of Fish and Game, Division of Wildlife Conservation. See, <http://www.adfg.alaska.gov/static/home/news/ongoingissues/pdfs/the-economic-importance-of-alaskas-wildlife-in-2011-summary-report.pdf>

is every instance of his unlawful guiding activity spanning years. Given the years' long, unbroken string of violations, deterrence to others similarly inclined is a large component of the government's sentencing argument.

C. Kinds of Sentences Available

The only other type of sentence available for this defendant is one that imposes a term of jail time or home confinement, neither which the government is recommending based on the offense conduct, the defendant's personal characteristics and background.

D. Sentencing Ranges Available

The sentence recommended by the United States is within that which would ultimately be calculated by the Presentence Report and the Sentencing Guidelines.

E. Pertinent Policy Statements

The United States is unaware of any pertinent policy statements applicable to the sentence it recommends.

F. Need to Avoid Sentence Disparity

The sentence recommended by the United States is comparable to other illegal hunting cases based on the evidence and matters believed to be provable at trial. The most recent, and only case of similar magnitude was *United States v. Clark Dixon, et. al. Clark Dixon*, (Dixon) (4:15-cr-00023-RRB). Dixon pleaded guilty to two felony counts of the Lacey Act for illegal guiding of wildlife in the

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Noatak National Wildlife Refuge. Hicks' actions in this case paralleled and equaled Dixon's in both volume and egregiousness. Dixon led and guided more than a dozen illegal hunts claiming the hunts were legal under state residency. Friends and associates paid for the illegal hunts claiming they were 'buddy/friend' hunts, similar to how Hicks described his hunts after his guiding license was revoked. Dixon, who was a resident of Alabama, and not Alaska, used almost all of his illegal hunts as footage for his cable television show called 'The Syndicate,' which, due to his conviction, is now off the air. Like Hicks, Dixon maintained an active social media presence, posting his illegal hunts as legal and boasting of exploits to further his business aspirations. Dixon agreed to a plea of two felony Lacey Act counts for transporting unlawfully taken game, agreed to pay a fine of \$75,000 and agreed to a term of 18 months imprisonment. The plea terms and the plea agreement were accepted by the Judge Beistline, who sentenced Dixon in conformity with the terms of the plea agreement.

With respect to the present case, Hicks and his clients filed false paperwork with the state of Alaska, claiming game, such as brown bears, Dall sheep, moose and mountain goats, were taken legally, thus concealing the crime until the paperwork was examined and compared to known facts surrounding each hunt.

In another instance, an illegally taken bear was not reported or presented for sealing at all, and it's whereabouts are unknown. In this case, there was virtually

nothing legal about anything connected to these hunts. Illegal from the start, illegal at the end, and all concealed by lies and false reports.

In another recent matter, *U.S. Richardson, et al*, 3:17-cr-00087-TMB-KFM, the defendants pleaded guilty to various felony violations of the Lacey Act for the illegal take of game within the Wrangell St. Elias National Park and Preserve. Defendants Richardson and Harris were each sentenced to serve three months in a halfway house followed by three months of home confinement. Defendant Lackner was sentenced to six months of home confinement.

The two men, and one other, previously pleaded guilty to several violations of the Lacey Act and other federal laws. Richardson pleaded guilty to one count of misdemeanor Conspiracy to violate the Lacey Act and two counts felony Conspiracy to violate the Lacey Act. Harris pleaded guilty to one count felony Conspiracy to violate the Lacey Act, one count felony Lacey Act False Record, one count False Statements, and one count Conspiracy to Use Substance to Incapacitate Game. Defendant Lackner pleaded guilty to one count misdemeanor Conspiracy to violate the Lacey Act and one count Lacey Act False Record. In contrast, Hicks' activity is all felony level category, done knowingly and willfully. While Hicks didn't represent himself as a licensed guide to the clients he guided after he was revoked, he continued to function as one and be compensated as one after he was revoked. He did continue to advertise as one on his truck and social

media when the opposite was true. In connection with those acts, as shown in the included chart none of Hicks hunts were conducted in compliance with the law and each hunt violated several laws before, during, and after the hunts.

Fine/Forfeiture

The fine of \$50,000 sought by the United States is significant. It is, however, still well below the statutory maximum of \$250,000. Hicks' conduct easily justifies a significant fine. The government requests that the fine amount be directed toward the Lacey Act Reward Fund, administered by the U.S. Fish and Wildlife Service.

Specific Conditions of Supervision

Because this defendant cannot abide by the rules regulating hunting, guiding and the taking of big game, and because the defendant intentionally wasted game and failed to abide by the legal and ethical standards of hunting and guiding, the United States requests the following conditions of supervision:

-No hunting worldwide, nor accompanying anyone in the field hunting, worldwide for the term of supervision.

-No aircraft ownership, lease, 'buddy exchange for hunts' nor any type of promissory or possessory interest in any aircraft for the term of supervision.

-No social media presence for the term of supervision as it concerns hunting

-No applying for any type of guide, assistant guide or any other guiding and/or hunting license for the term of supervision

-No flying of any type of private aircraft. Any commercial flying for employment must be applied for and approved by the court.

IV. CONCLUSION

The court has before a lengthy and detailed investigation which documents beyond doubt years of egregious violations of federal and Alaska law by Stephen Hicks. Because he could not guide legally, he instead elected to skirt the laws in place designed for safe, ethical, and legal big game guiding. The fact that each hunt, illegal on its own, had several other violations occur during the illegal hunt is further testament to Hicks' mindset of the ends justifying the means. He should be sentenced in accord with the recommendations made herein.

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RESPECTFULLY SUBMITTED April 18, 2022, in Anchorage, Alaska.

JOHN E. KUHN, JR.
Acting United States Attorney

s/Steven E. Skrocki
STEVEN E. SKROCKI
Assistant United States Attorney

s/Ronald Dupuis
RONALD DUPUIS
Special Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2022, a copy
of the foregoing was served electronically on:

Kevin Fitzgerald

s/Steven E. Skrocki
s/ Ronald Dupuis
Office of the U.S. Attorney

Photo 1
October 2017, AT Same Day Airborne Moose (PSR ¶ 9)



Photo 2

October 2017, AT with brown bear, no brown bear tag, animal not reported or sealed, whereabouts unknown (PSR ¶ 9)



Photo 3 (a) and (b)

May 2019, CS Bear hunt, overlimit of black bears, two black bears in the same regulatory year, guide license revoked. (PSR ¶ 11)

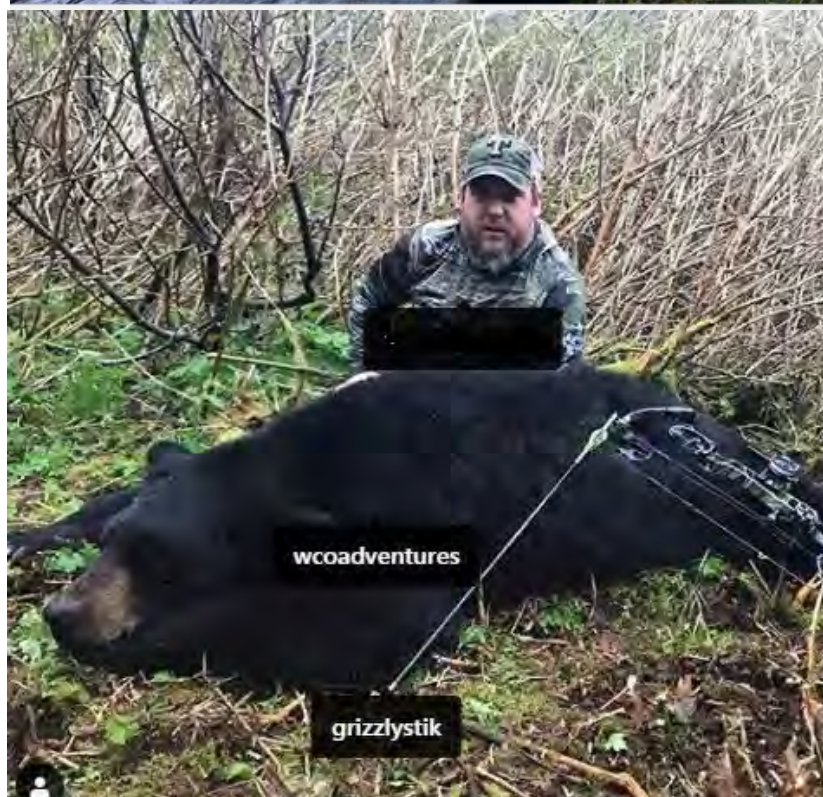


Photo 4

JD (far right of photo) Moose, no land use permit, Mental Health Lands, false records (PSR ¶ 7)



Photo 5

JS Moose, no land use permit State Mental Health Lands, false records (PSR ¶ 7)



Photo 6

JS (on left) with Hicks, unidentified male, and JD moose rack, no land use permits, falsify records, (PSR ¶ 7)



Photo 7

Count 1 of the Indictment/Plea Agreement, no land use permit, guide not present in the field. (PSR ¶ 5)



World-Class Outdoor-Adventures

August 14, 2018 · 🌐



This never gets old!!!



Photos 8-9

September 2019, EP and CC with bartered aircraft, guide big game hunters after license revoked, two bull moose killed (PSR ¶ 12) with Hicks assisting in field dressing a moose during this hunt. (Guiding activity)



Photo 9



Photo 10

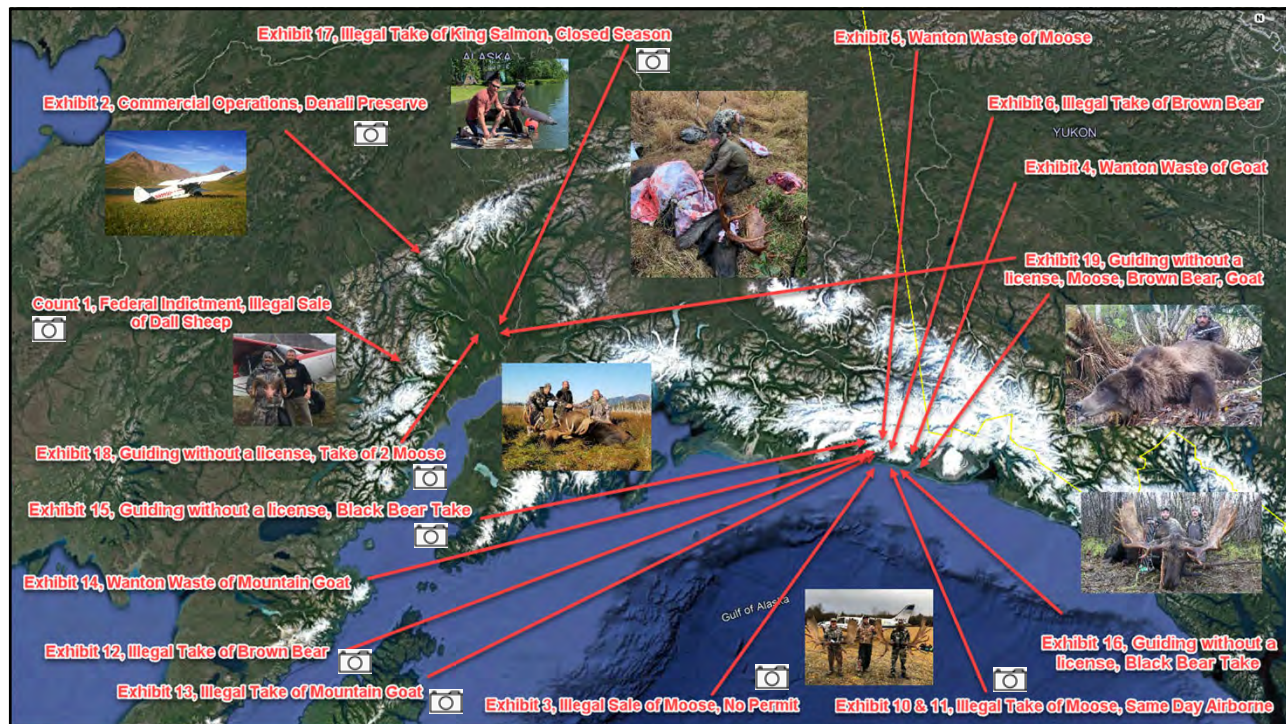
PG Illegal Take of Goat, guide not present in the field, take over limit of goats
(attempt) PSR ¶ 9)



Photo 11

October 2017, AT Goat, illegal attempt, guide not present in the field, overlimit,
with PG's goat from photo 10 (PSR ¶ 9)





1

Investigation Included:

- Records- Alaska hunting records, contracts, bank records
- Social Media-Posts, messaging
- Communications- Email, social media, satellite messaging devices, texts
- Photographs and Videos- Metadata, surveillance, site visits
- GPS location data- satellite messaging devices, cellphone, tracking devices
- Recorded Witness Interviews

2

Impacts to Wildlife, 2015-2019

- 2 Illegally Sold Dall Sheep
- 7 Illegally Sold Moose
- 3 Illegally Taken Moose
- 2 Illegally Taken Mountain Goats
- 2 Illegally Taken Brown Bear
- 1 Illegally Sold Black Bear
- 1 Illegally Taken Black Bear

3

Impacts to People

1. **Damage to the legitimate guiding industry and hunters.**
 - Approximate market value of illegally sold, harvested, and wasted animals, \$186,000.
 - 18 big game animals lost to legitimate industry and hunters
2. **Safety, well being, and satisfaction of clients.**
 - 2015 clients abandoned in Denali National Preserve after HICKS crashed spotting moose from the air.
 - 2017 unsafe and unsatisfactory Yakataga field conditions ruling by the BGCSB. Hunters abandoned hunt due to HICKS conduct.
 - Injured Hunter
 - Wasted animals
 - Hunters directed to commit violations.
3. **Negative impacts to game and land managers ability to conserve wildlife and public lands.**

4

Themes and Schemes

- Lies, fraud, and deceit from the beginning to the end
- Total disregard for wildlife and land use laws and regulations

5

When is a Big Game Guide License Required?

The formula is clear and unambiguous: $A + B = C$

A: If someone provides guiding “services” (see definition)

+

B: For “compensation” (see definition)

=

C: A big game guide license is required

6

State Definitions of Guide and Outfit

(8) "guide" means to provide, for compensation or with the intent or with an agreement to receive compensation, services, equipment, or facilities to a big game hunter in the field by a person who accompanies or is present with the big game hunter in the field either personally or through an assistant; in this paragraph, "services" includes

(A) contracting to guide or outfit big game hunts;

(B) stalking, pursuing, tracking, killing, or attempting to kill big game;

(C) packing, preparing, salvaging, or caring for meat, except that which is required to properly and safely load the meat on the mode of transportation being used by a transporter;

(D) field preparation of trophies, including skinning and caping;

(E) selling, leasing, or renting goods when the transaction occurs in the field;

(F) using guiding or outfitting equipment, including spotting scopes and firearms, for the benefit of a hunter; and

(G) providing camping or hunting equipment or supplies that are already located in the field;

(9) "outfit" means to provide, for compensation or with the intent to receive compensation, services, supplies, or facilities to a big game hunter in the field, by a person who neither accompanies nor is present with the big game hunter in the field either personally or by an assistant;

(10) "transportation services" means the carriage for compensation of big game hunters, their equipment, or big game animals harvested by hunters to, from, or in the field; "transportation services" does not include the carriage by aircraft of big game hunters, their equipment, or big game animals harvested by hunters

7


Exhibit #1

False Statements on Guide License Application

Hicks provided false information and failed to disclose cruelty to animals and marijuana possession criminal convictions on his application for a big game guiding license in 2010

8

Place in LICENSING FILE ✓
GLI A 4196



STATE OF ALASKA
DEPARTMENT OF
COMMERCE
COMMUNITY AND
ECONOMIC DEVELOPMENT

Division of Corporations, Business and Professional Licensing

Sean Parnell, Governor
Susan Bell, Commissioner
Donald Habeger, Director

RECEIVED
JUNEAU
DEC 22 2010

Division of Corporations, Business
and Professional Licensing

CERTIFIED #7009-1410-0001-4156-8612
RETURN RECEIPT REQUESTED

December 17, 2010

Stephen J. Hicks
8901 Joy Circle
Anchorage, AK 99502

RE: 1750-10-002

Dear Mr. Hicks:

9

3) **Admission/Facts.** Respondent admits to the following facts: ←

- a) In January 1999, Respondent was convicted in a General Courts Martial of wrongful possession and distribution of marihuana, wrongful possession and distribution of methamphetamine, and wrongful use of cocaine. Respondent was sentenced to receive a bad conduct discharge from the US Air Force, reduction to the grade of E-1, and to serve 13 months confinement.
- b) On May 18, 1995, in County Court of Comanche County, Texas, Respondent was found guilty of Cruelty to Animals and fined \$200 and \$175 in court costs.
- c) On May 18, 1995, in County Court of Comanche County, Texas, Respondent was found guilty of Possession of Marihuana and fined \$300 and \$175 in court costs.
- d) Respondent failed to disclose his criminal misdemeanor convictions noted in "b" and "c" above on his initial application for licensure.

10

Exhibit #3

Illegal Sale and Transportation of Wildlife, No Land Use Permit

In October of 2016, HICKS guided J.D. on “Mental Health Trust” lands in Alaska, knowing that he did not have a land use permit for that area.

11


2020 State Charging Document

1 | IN THE DISTRICT COURT FOR THE STATE OF ALASKA
 2 | THIRD JUDICIAL DISTRICT AT ANCHORAGE
 3 | STATE OF ALASKA,
 4 | Plaintiff,
 5 | vs.
 6 |
 7 | STEPHEN JEREMY HICKS
 8 | [REDACTED]
 9 | [REDACTED]
 10 | [REDACTED]
 11 | DOUGLAS LEON ZWEIFEL
 12 | [REDACTED]

12

AMENDED INFORMATION	
<p>I certify this document and its attachments do not contain the (1) name of a victim of a sexual offense listed in AS 12.61.140 or (2) residential or business address or telephone number of a victim or witness to any offense unless it is an address identifying the place of a crime or an address or telephone number in a transcript of a court proceeding and disclosure of the information was ordered by the court. The following counts charge a crime involving DOMESTIC VIOLENCE as defined in AS 18.66.990. None.</p>	
Count I - AS 08.54.720(a)(8) Guide - Commit, Aid, Or Allow Violation Stephen Jeremy Hicks - 001	Count X - AS 11.56.210(a)(2) Unsworn Falsification In The Second Degree Stephen Jeremy Hicks - 009
Count II - AS 08.54.720(a)(8) Guide - Commit, Aid, Or Allow Violation Stephen Jeremy Hicks - 002	Count XI - AS 11.56.210(a)(2) Unsworn Falsification In The Second Degree Stephen Jeremy Hicks - 010
Count III - AS 08.54.720(a)(8) Guide - Commit, Aid, Or Allow Violation Stephen Jeremy Hicks - 003	Count XII - AS 11.56.210(a)(2) Unsworn Falsification In The Second Degree Stephen Jeremy Hicks - 011
Count IV - AS 08.54.720(a)(8) Guide - Commit, Aid, Or Allow Violation Stephen Jeremy Hicks - 004	Count XIII - AS 16.30.010 Wanton Waste Of Big Game And Wild Fowl Stephen Jeremy Hicks - 012
Count V - AS 16.30.010 Wanton Waste Of Big Game And Wild Fowl Stephen Jeremy Hicks - 005	
Count VI - AS 16.30.010 Wanton Waste Of Big Game And Wild Fowl Bradford Burns - 001	
Count VII - AS 08.54.720(a)(1) Guide-Fail To Report Violation Stephen Jeremy Hicks - 006	
Count VIII - 5AAC92.085(4) Big Game-Unlawful Methods-Bait Craig Emmett Hill - 001, Stephen Jeremy Hicks - 007	
Count IX - AS 11.56.210(a)(2) Unsworn Falsification In The Second Degree Stephen Jeremy Hicks - 008	

13

<p>THE OFFICE OF SPECIAL PROSECUTIONS CHARGES:</p> <p>COUNT I</p> <p>That in the Third Judicial District, State of Alaska, on or about October 10, 2016, at or near Anchorage, STEPHEN JEREMY HICKS, a registered guide under AS 08.54 knowingly committed or aided in the commission of a violation of AS 08.54.720(a)(4). To wit: take moose with client JD on Mental Health Trust Land.</p> 

14

COUNT II

That in the Third Judicial District, State of Alaska, on or about October 10, 2016, at or near Anchorage, STEPHEN JEREMY HICKS, a registered guide under AS 08.54 knowingly committed or aided in the commission of a violation of AS08.54.720(a)(4). To wit: take moose with client [REDACTED] RD on Mental Health Trust Land.

All of which is a Not Classified Misdemeanor offense being contrary to and in violation of AS 08.54.720(a)(8) and against the peace and dignity of the State of Alaska.

COUNT III

That in the Third Judicial District, State of Alaska, on or about October 11, 2016, at or near Anchorage, STEPHEN JEREMY HICKS, a registered guide under AS 08.54 knowingly committed or aided in the commission of a violation of AS 08.54.720(a)(4). To wit: take moose with client [REDACTED] RG on Mental Health Trust Land.

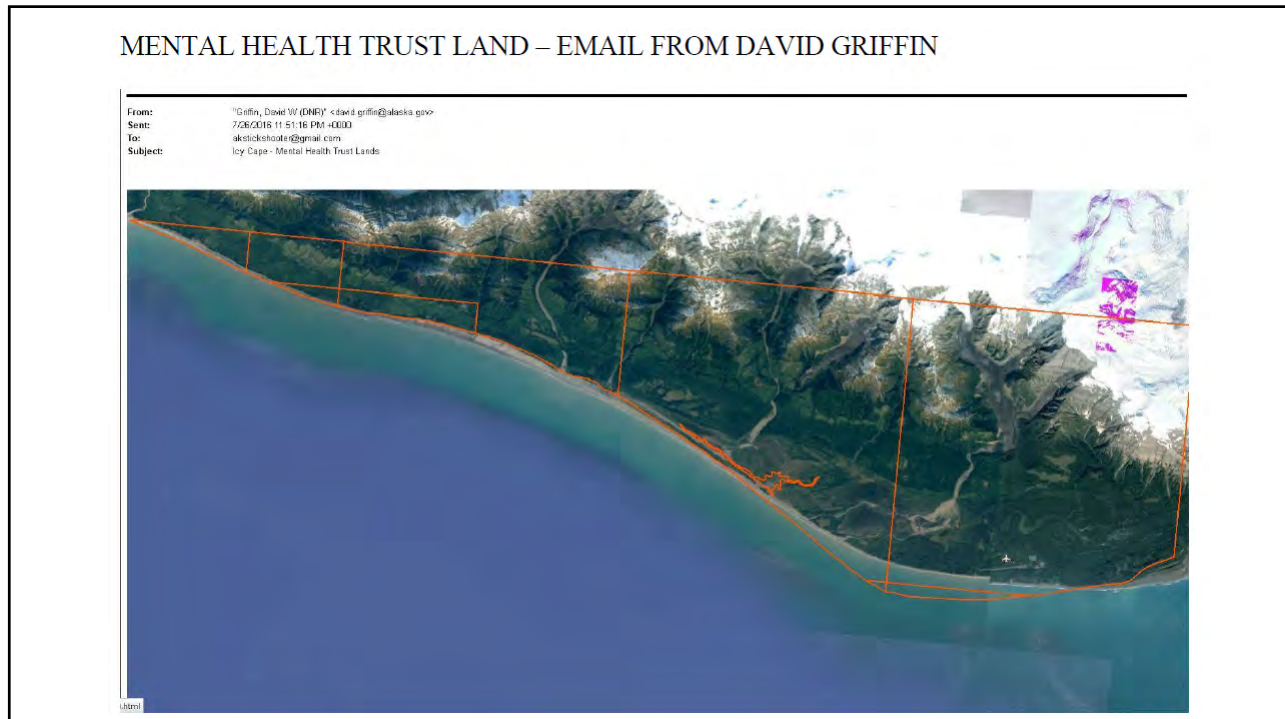
All of which is a Not Classified Misdemeanor offense being contrary to and in violation of AS 08.54.720(a)(8) and against the peace and dignity of the State of Alaska.

COUNT IV

That in the Third Judicial District, State of Alaska, on or about October 13, 2016, at or near Anchorage, STEPHEN JEREMY HICKS, a registered guide under AS 08.54 knowingly committed or aided in the commission of a violation of AS 08.54.720(a)(4). To wit: take moose with client [REDACTED] JS on Mental Health Trust Land.

All of which is a Not Classified Misdemeanor offense being contrary to and in violation of AS 08.54.720(a)(8) and against the peace and dignity of the State of Alaska.

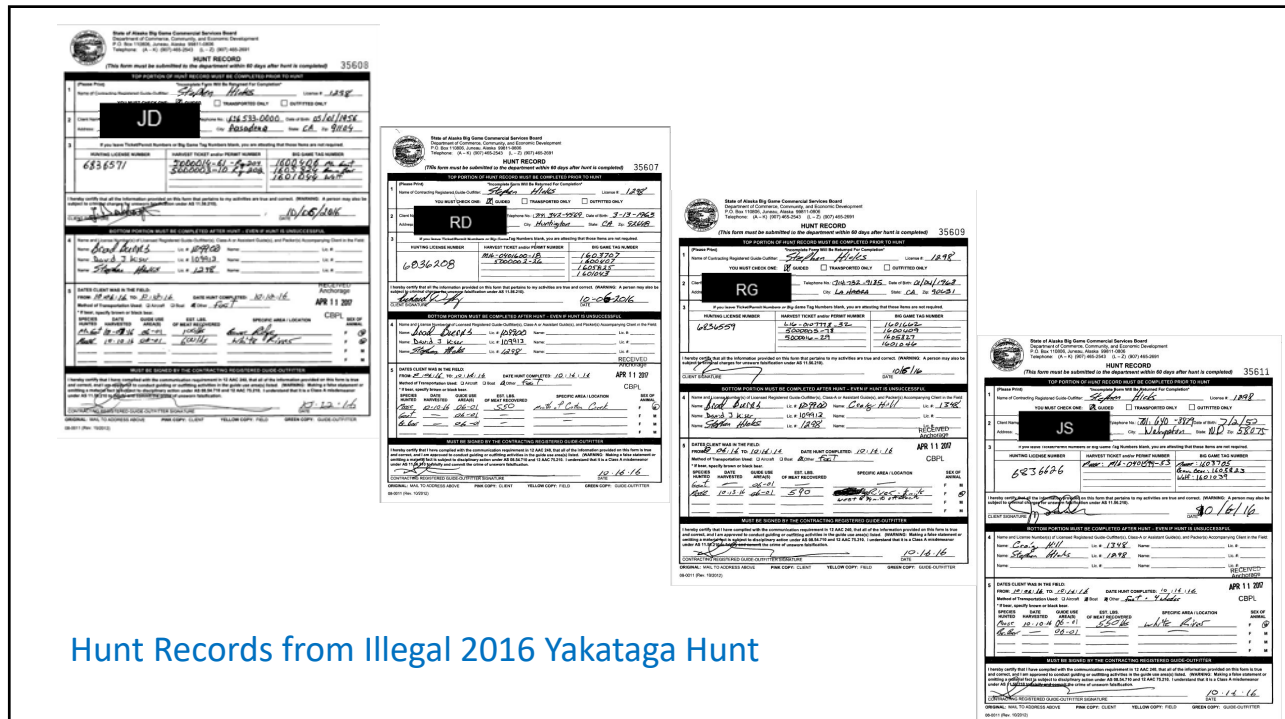
15



16



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18

Exhibit #4

Wanton Waste of a Mountain Goat

In October of 2016, client CF took a goat and at the direction of HICKS, the goat was abandoned in the field and not salvaged.

19

2020 State Charging Document

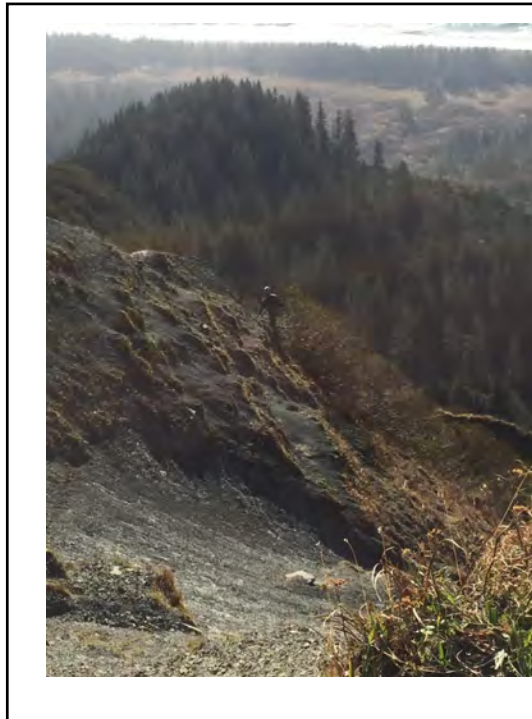
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COUNT V

That in the Third Judicial District, State of Alaska, on or about October 12, 2016, at or near Anchorage, STEPHEN JEREMY HICKS, as principal and/or accomplice killed a big game animal and failed to intentionally, knowingly, recklessly, or with criminal negligence to salvage for human consumption the edible meat of the animal, to include but not limited to the hindquarters. To wit: C [REDACTED] CF's goat.

All of which is a Class A Misdemeanor offense being contrary to and in violation of AS 16.30.010 and against the peace and dignity of the State of Alaska.

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State of Alaska Big Game Commercial Services Board
 Department of Commerce, Community, and Economic Development
 P. O. Box 110026, Juneau, Alaska 99811-0026
 Telephone: (A-K) (907) 485-2543 (L-Z) (907) 465-2691

HUNT RECORD
 (This form must be submitted to the department within 60 days after hunt is completed) 35612

TOP PORTION OF HUNT RECORD MUST BE COMPLETED PRIOR TO HUNT

1 (Please Print) Name of Contracting Registered Guide-Outfitter: Stephen Hicks License # 1298
 You must choose one: CLIENT TRANSPORTED ONLY OUTFITTER ONLY

2 Client Name: CF Telephone No. 907 3821946 Date of Birth: 09 11 56
 Address: 942 City Anchorage State AK Zip 99507

3 If you leave Ticket/Permit Numbers or Big Game Tag Numbers blank, you are attesting that these items are not required.

HUNTING LICENSE NUMBER	HARVEST TICKET and/or PERMIT NUMBER	BIG GAME TAG NUMBER
<u>6735490</u>	Class <u>RG 202</u> Group <u>RG 204</u>	<u>5000001-42</u> <u>5000007-96</u>

I hereby certify that all the information provided on this form that pertains to my activities is true and correct. (WARNING: A person may also be subject to criminal charges for misrepresentation under AS 11.56.216).

CLIENT SIGNATURE: [Signature] DATE: 10/10/2016

BOTTOM PORTION MUST BE COMPLETED AFTER HUNT - EVEN IF HUNT IS UNSUCCESSFUL

4 Name and License Number(s) of Licensed Registered Guide-Outfitter(s), Class-A or Assistant Guide(s), and Packets) Accompanying Client in the Field:
 Name: Stephen Hicks Lic. #: 1298 Name: _____ Lic. #: _____
 Name: Dave Kiser Lic. #: 109915 Name: _____ Lic. #: _____
 Name: _____ Lic. #: _____ Name: _____ Lic. #: _____

5 DATES CLIENT WAS IN THE FIELD: FROM: 10/10/16 TO: 10/13/16 DATE HUNT COMPLETED: 10/13/16 RECEIVED: Anchorage
 Method of Transportation Used: Aircraft Boat Other: Foot APR 11 2017
 * If deer, specify brown or black bear.

SPECIES HUNTED	DATE HARVESTED	GUIDE USE AREAS	EST. LBS. OF MEAT RECOVERED	SPECIFIC AREA / LOCATION	CBPI	SEX OF ANIMAL
<u>Goat</u>	<u>10-11-16</u>	<u>06-01</u>	<u>None</u>	<u>Bronze Ridge - Delat</u>		<u>F</u>
_____	_____	_____	_____	_____		<u>F</u>
_____	_____	_____	_____	_____		<u>F</u>
_____	_____	_____	_____	_____		<u>F</u>

I hereby certify that I have complied with the communication requirement in 12 AAC 240, that all of the information provided on this form is true and correct, and I am approved to conduct guiding or outfitting activities in the guide use areas I listed. (WARNING: Making a false statement or omitting a material fact is subject to disciplinary action under AS 08.54.719 and 12 AAC 75.210. I understand that it is a Class A misdemeanor under AS 11.62.156(a) to falsify and commit the crime of unknown falsification.)

CONTRACTING REGISTERED GUIDE-OUTFITTER SIGNATURE: [Signature] DATE: 10-13-16

ORIGINAL: MAIL TO ADDRESS ABOVE PINK COPY: CLIENT YELLOW COPY: FIELD GREEN COPY: GUIDE-OUTFITTER
 08-0011 (Rev. 10/2012)

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Excerpts from C.F. Interview

(I asked if Kiser had any concerns about the goat going over a cliff). Well, that's why we got close. And he was pretty excited. He said, "You can drop this. You got enough gun power." We had the 338. And I'm taking the shot. I kind of agreed with him. I said, "There he is." I can almost reach out and touch him. And if he goes sliding then he's a goner. But I think we can get him. We discussed it.

So, now, by this point, this is kind of getting to where I shoot. This is Dave. So, this goat that I shot, that was me, my feet, sitting back here. This is about 55 yards. Dave is walking upright, he's not crawling. There's a little thing. I thought, "For the love of God, if we had a rope, we could tie off." Look at all this shrubbery. We could have tied and gone after him. Dave is in the picture. He's about to be exactly where I shot. So, I was just running pictures off, because I'm like, "God, where did that goat go?"

Dave had communication with Hicks. He said, "Stephen, we got a goat down, I need help." I think it was his Delorme. He said, "I need help," and "send up a rope."

This is the third day of the hunt. The location I was when I shot was pretty much where I was taking these pictures, which is about 55 yards (the photo showed the back of Kiser while he was standing near shrubs). I'm back across this little shaling here. Dave is where the goat was. The goat was sitting. You could see his face and his whole body. There's a little bit of a rock there.

Dave and I were here. We both saw the goat. The goat was where Dave is in the picture, where the bush is.

After I shot the goat, he stood up, and he turned around, and I tried to put another round in him. All he did was stand, did a piroouette on the rock that he was on, and then that was it. He was out of sight.

I took a second shot when I saw him stand. But we saw like just (Fox made a sound), up in the shoulder. The first shot was in the shoulder. He was looking at us, and it was right on shoulder.

The first shot was in the shoulder. I took one more shot quick. Who knows where that one went on the body. Then, that was it. Dave got down to the spot, and he looks, shit, he lit up a cigarette. I go, "God, he's not seeing him." I'm seeing these birds circle right over Dave's head, he's gotta be there.

So, we backtracked and went up higher. And sure enough. I didn't take a picture of the higher spot. I was so pissed, I didn't even want a picture of my goat when he said that we're not getting any help, we're not getting a rope. I was so disgusted, I wished I had never shot him.

22

Exhibit #5

Wanton Waste of a Moose

In October of 2016, client JD took a moose and at the direction of HICKS discarded the meat while in the field.

23

2020 State Charging Document

COUNT VII

That in the Third Judicial District, State of Alaska, on or about October 10, 2016, at or near Anchorage, STEPHEN JEREMY HICKS, a registered guide under AS 08.54 knowingly failed to promptly report to the Department of Public Safety a violation of AS 16.30.010. To wit: wanton waste of Dabbaghian moose.

All of which is a Not Classified Misdemeanor offense being contrary to and in violation of AS 16.30.010 and against the peace and dignity of the State of Alaska.

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(I asked Burns what Hicks knew about the two moose being killed within four hours of each other and the circumstances) I would imagine I would have told him 'cause, at least that they're down, 'cause that's good. I can't say for certain I said, hey, Rick's wet and cold and we're drying him out. Like I say, I don't talk to Steve a whole lot, 'cause he's hot tempered. I can tell you, I didn't think that was going to be an issue. I thought it's dark already, it's cold. There was frost. It was cold. It was cold enough. I wasn't worried about the meat. It was cold enough that I was blown to pieces that it started turning that quick. To me, this was a real learning experience, something I won't do again. Just because of all these factors of rushing these things. So, it was a real good learning experience for me, but I don't know I would not have said, hey, Steve, get somebody out here right now. I wouldn't have been like that to him. But I would have said, there's two moose on the ground, we need to get them out. To me, urgency would have been that day anyway because that's just a long time, two days in the field.

(I said that four hours was a collapsed time frame to kill two moose when Burns was the only one there to do anything) Yeah. That's the part I'm talking about, I will not do that again.

This was the first year I was an assistant guide. So, there's bound to be learning done. That's what I learned. As great as a story that is, I'm guy who, you know, we got it done. I'm good enough, that we've seen all that stuff, and that's good. But, I will not do that again just because of that learning experience. I didn't know there was water there, shouldn't have taken that long to get to him, could have been, there's a ton of variables.

Excerpts from C.F. Interview and InReach messages

(Inv. Hinton asked what would have happened if the second moose wasn't shot) I'm sure Steve would have been disappointed. If you don't get a kill for everybody, that's bad, they pay big money to come up here and, you hunt, show them a good time, that's why I get up every morning and cook them coffee. I think I do a lot more than some people do for the comfort of the people.

INR	10/23/16 12:51 AM	10/23/16 12:52 AM	blburns_308@inrea	13344504948	I turned the device off to charge it for an hour may have changed a setting	60.10309	-142.7618
MO	10/23/16 12:51 AM	10/23/16 12:52 AM	Blburns_308@inrea	13344504948	This hunter wants to go in the morning. Last hunt with him will be tonight. Steve keeps trying to fly in new clients.	60.10309	-142.7618
1948	0	0			process that meat correct	10/17/2016 16:10	10/17/2016 16:10 MT
1949	0	0			Johnnys meat that got spoiled was in the Connex you had the guys debone it put it in the freezer that is part of what we brought out I do not want to pr	10/17/2016 16:10	10/17/2016 16:10 MT
1960	-142.432	60.06551			Ok just find a dumpster and throw it away I guess. The other one you have should be good we had to fly it out bud it's the law. We found jays bag too!!	10/17/2016 19:26	10/17/2016 19:27 MO

25

Exhibit #6

Illegal Take of Brown Bear, Use of Bait

In October of 2016 HICKS' client C.G. took a brown bear over bait.

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2020 State Charging Document

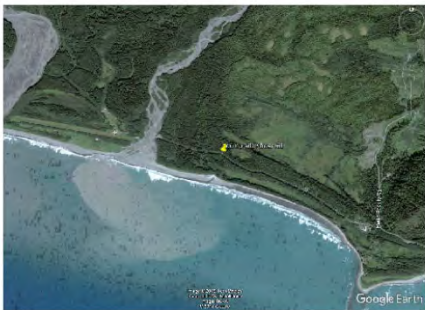
COUNT VIII

That in the Third Judicial District, State of Alaska, on or about October 22, 2016, at or near Anchorage, **CRAIG EMMETT HILL AND STEPHEN JEREMY HICKS** took a brown bear with the use of bait or scent lure. To wit: **CG** bear.

All of which is a Class A Misdemeanor offense being contrary to and in violation of AS 5AAC92.085(4) and against the peace and dignity of the State of Alaska.

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Hunt Records and InReach Msgs, C.G. Bear



2374	-142.432	60.06546	Saw a nice brown bear and tonight as we pulled into the dump to drop garbage!! Took off running at 50 yards as we pulled in!! Lol	10/21/2016 4:58	10/21/2016 4:58	MO
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HUNT RECORD 35613

(This form must be submitted to the department within 60 days after hunt is completed)

TOP PORTION OF HUNT RECORD MUST BE COMPLETED PRIOR TO HUNT

1. Name of Contracting Registered Guide/Outfitter: Stephen Hicks License # 1298

YOU MUST CHECK ONE: GUIDED TRANSPORTED ONLY OUTFITTER ONLY

2. Client Name: **CG** Telephone No. 832-820-3443 Date of Birth 02-01-70

Address: On Cassel Bluffs near IA to S1893

3. HUNTING LICENSE NUMBER: 6740738 HARVEST TICKET AND/OR PERMIT NUMBER: Permit AK-081801-14 BIG GAME TAG NUMBER: Tag AK-338

4. Name and License Number(s) of Licensed Registered Guide/Outfitter, Class A or Assistant Guide(s), and Partner(s) Accompanying Client in the Field:

Name: <u>Stephen Hill</u>	License #:	License #:
Name: <u>Stephen Hicks</u>	License #:	License #:

5. DATE CLIENT WAS IN THE FIELD: From 10-14-16 to 10-25-16 DATE HUNT COMPLETED: 10-25-16 APR 11 2007 CBPL

6. HUNTING RESULTS:

SEXES	DATE	GUIDE USE	EST. LBS.	SPECIFIC AREA/LOCATION	SEX OF ANIMAL
MALE	<u>10-22-16</u>	<u>CG-01</u>	<u>120</u>	<u>West Side Cape Reliance</u>	<input checked="" type="checkbox"/> M

MUST BE COMPLETED BY THE CONTRACTING REGISTERED GUIDE/OUTFITTER

I hereby certify that all the information provided on this form that pertains to my activities are true and correct. (WARNING: A person may also be subject to criminal charges for untruthful information under AS 11.86.250)

CONTRACTING REGISTERED GUIDE/OUTFITTER SIGNATURE: [Signature] DATE: 10-25-16

ORIGINAL: GREEN. TO ADDRESS NOTICE: PINK COPY. CLIENT: YELLOW COPY. FIELD: GREEN COPY. GUIDE/OUTFITTER: 88-0011 (Rev. 10/07/12)

28

Exhibit #7

Submit a False Record

In April of 2017 HICKS submitted a false record of a hunt concealing that client R.G.'s goat was not recovered.

29

2020 State Charging Document

COUNT IX

That in the Third Judicial District, State of Alaska, on or about April 17, 2017, at or near Anchorage, STEPHEN JEREMY HICKS with the intent to mislead a public servant in the performance of a duty, submitted a false written or recorded statement which the defendant did not believe to be true on a form bearing notice, authorized by law, that false statements made in it are punishable. To wit: RG's goat hunt record.

All of which is a class A Misdemeanor offense being contrary to and in violation of AS11.56.210(a)(2) and against the peace and dignity of the State of Alaska.

30

State of Alaska Big Game Commercial Services Board
 Department of Commerce, Community, and Economic Development
 P.O. Box 110606, Juneau, Alaska 99811-0606
 Telephone: (A-K) (907) 465-2543 (L-Z) (907) 465-2691

HUNT RECORD
 (This form must be submitted to the department within 60 days after hunt is completed) 35609

TOP PORTION OF HUNT RECORD MUST BE COMPLETED PRIOR TO HUNT

(Please Print) "Incomplete Form Will Be Returned For Completion"

1 Name of Contracting Registered Guide-Outfitter: Stephen Hicks License #: 1298
 YOU MUST CHECK ONE: GUIDED TRANSPORTED ONLY OUTFITTER ONLY

2 Client Name: RG Telephone No: 714-732-9185 Date of Birth: 01/01/1968
 Address: LA HABRA City: LA HABRA State: CA Zip: 90631

3 If you leave Tick/Permit Numbers or Big Game Tag Numbers blank, you are attesting that those items are not required.

HUNTING LICENSE NUMBER	HARVEST TICKET and/or PERMIT NUMBER	BIG GAME TAG NUMBER
<u>6834559</u>	<u>L16-007778-32</u>	<u>1601662</u>
	<u>5000005-18</u>	<u>1600409</u>
	<u>5000016-29</u>	<u>1605827</u>
		<u>1601046</u>

I hereby certify that all the information provided on this form that pertains to my activities are true and correct. (WARNING: A person may also be subject to criminal charges for unsworn falsification under AS 11.56.210).

CLIENT SIGNATURE: [Signature] DATE: 10/15/16

BOTTOM PORTION MUST BE COMPLETED AFTER HUNT - EVEN IF HUNT IS UNSUCCESSFUL.

4 Name and License Number(s) of Licensed Registered Guide-Outfitter(s), Class A or Assistant Guide(s), and Picker(s) Accompanying Client in the Field:
 Name: David Purvis Lic. #: 109900 Name: Craig Hill Lic. #: 1348
 Name: David J. Kiser Lic. #: 109912 Name: _____ Lic. #: _____
 Name: Stephen Hicks Lic. #: 1298 Name: _____ Lic. #: _____

5 DATES CLIENT WAS IN THE FIELD: FROM 06.16 TO 10.16.16 DATE HUNT COMPLETED: 10.16.16 APR 11 2017
 Method of Transportation Used: Aircraft Boat Other: Foot CBPL

SPECIES HUNTED	DATE HARVESTED	GUIDE USE AREA(S)	EST. LBS. OF MEAT RECOVERED	SPECIFIC AREA / LOCATION	SEX OF ANIMAL
<u>Goat</u>	<u>06-01</u>				F M
<u>Goat</u>	<u>10.15.16</u>	<u>06-01</u>	<u>590</u>	<u>Went to River to take meat to the stomach</u>	F M

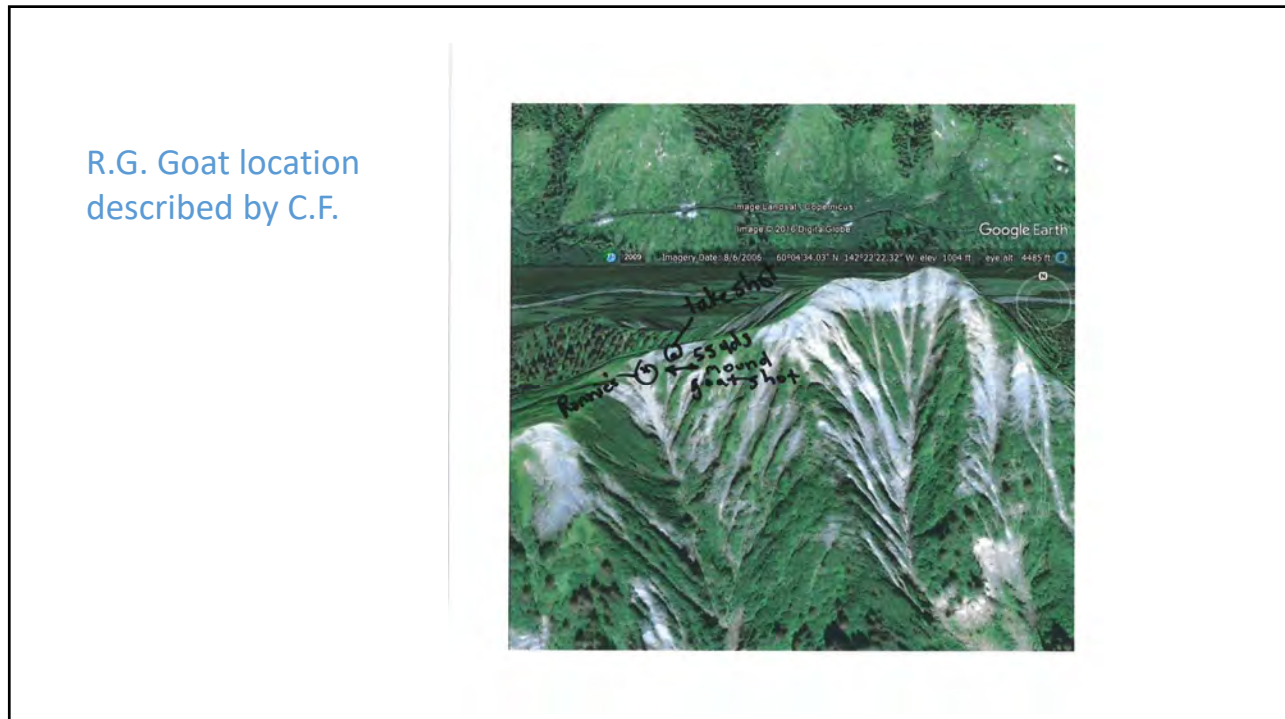
MUST BE SIGNED BY THE CONTRACTING REGISTERED GUIDE-OUTFITTER

I hereby certify that I have complied with the communication requirement in 12 AAC 246, that all of the information provided on this form is true and correct, and I am approved to conduct guiding or outfitting activities in the guide use area(s) listed. (WARNING: Making a false statement or omitting a material fact is subject to disciplinary action under AS 08.54.710 and 12 AAC 75.216. I understand that it is a Class A misdemeanor under AS 11.56.210 to knowingly and willfully commit the crime of unsworn falsification.)

CONTRACTING REGISTERED GUIDE-OUTFITTER SIGNATURE: [Signature] DATE: 10.16.16

ORIGINAL: MAIL TO ADDRESS ABOVE PINK COPY: CLIENT YELLOW COPY: FIELD GREEN COPY: GUIDE-OUTFITTER
 08-0011 (Rev. 10/2012)

31



32

Exhibit #8

Submit a False Record

In April of 2017, HICKS submitted a false record, concealing the fact that client R.D.'s moose was taken on lands HICKS was not permitted to operate on.

33

2020 State Charging Document

COUNT X

That in the Third Judicial District, State of Alaska, on or about April 17, 2017, at or near Anchorage, STEPHEN JEREMY HICKS with the intent to mislead a public servant in the performance of a duty, submitted a false written or recorded statement which the defendant did not believe to be true on a form bearing notice, authorized by law, that false statements made in it are punishable. To wit: R. [REDACTED] RD [REDACTED] moose hunt record.

All of which is a class A Misdemeanor offense being contrary to and in violation of AS11.56.210(a)(2) and against the peace and dignity of the State of Alaska.

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35607

HUNT RECORD
(This form must be submitted to the department within 60 days after hunt is completed)

State of Alaska Big Game Commercial Services Board
Department of Commerce, Community, and Economic Development
P.O. Box 110808, Juneau, Alaska 99811-0808
Telephone: (A-K) (907) 455-2543 (L-K) (907) 455-2091

TOP PORTION OF HUNT RECORD MUST BE COMPLETED PRIOR TO HUNT

1 (Please Print) Name of Contracting Registered Guide-Outfitter: Stephen Hicks License #: 1288
 YOU MUST CHECK ONE: GUIDED TRANSPORTED ONLY OUTFITTED ONLY

2 Client Name: RD Telephone No: 794-342-5529 Date of Birth: 3-13-1963
 Address: RD 1402 City: Huntington State: CA Zip: 92448

3 If you have Ticket/Permit Numbers or Big Game Tag Numbers blank, you are attesting that those items are not required.

HUNTING LICENSE NUMBER	HARVEST TICKET and/or PERMIT NUMBER	BIG GAME TAG NUMBER
<u>6836208</u>	<u>MA-0401600-18</u> <u>5000002-26</u>	<u>1603707</u> <u>1600407</u> <u>1605825</u> <u>1601043</u>

I hereby certify that all the information provided on this form that pertains to my activities are true and correct. (WARNING: A person may also be subject to criminal charges/penalty/indictation under AS 11.26.210.)
 CLIENT SIGNATURE: Stephen Hicks DATE: 10-06-2016

BOTTOM PORTION MUST BE COMPLETED AFTER HUNT - EVEN IF HUNT IS UNSUCCESSFUL

4 Name and License Number of Licensed Registered Guide-Outfitter(s), Class-A or Assistant Guide(s), and Pack(s) Accompanying Client in the Field:
 Name: David Brooks Lic #: 109920 Name: _____ Lic #: _____
 Name: David J Kiser Lic #: 109913 Name: _____ Lic #: _____
 Name: Stephen Hicks Lic #: 1288 Name: _____ Lic #: _____

5 DATES CLIENT WAS IN THE FIELD: FROM: 06-16-16 TO: 10-16-16 DATE HUNT COMPLETED: 10-16-16 APR 11 2017
 Method of Transportation Used: Aircraft Boat Other Foot CBPL
 * If bear, specify brown or black bear: _____
 SPECIES DATE GUIDE USE EST. LBS. OF MEAT RECOVERED SPECIFIC AREA / LOCATION SEX OF ANIMAL
 HNTD HARVESTED AREA(S)
Moose 02-0-16 06-01 550 North of P. Cotton Creek F 60
Goat _____ 06-01 _____ _____ _____ _____ F M
Caribou _____ 06-01 _____ _____ _____ _____ F M

MUST BE SIGNED BY THE CONTRACTING REGISTERED GUIDE-OUTFITTER

I hereby certify that I have complied with the communication requirement in 12 AAC 246, that all of the information provided on this form is true and correct, and I am approved to conduct guiding or outfitting activities in the guide use area(s) listed. (WARNING: Making a false statement or certifying a misappreh fact is subject to disciplinary action under AS 06.24.710 and 12 AAC 75.210. I understand that it is a Class A misdemeanor under AS 11.26.210 to falsify and commit the crime of unsworn falsification.)
 CONTRACTING REGISTERED GUIDE-OUTFITTER SIGNATURE: _____ DATE: 10-16-16

ORIGINAL: MAIL TO ADDRESS ABOVE PINK COPY: CLIENT YELLOW COPY: FIELD GREEN COPY: GUIDE-OUTFITTER
08-0011 (Rev. 10/012)

35

Exhibit #9

Submit a False Record

In April 2017 HICKS submitted a false record concealing the fact that client J.S.'s moose was taken on lands HICKS was not permitted to operate on.

36


2020 State Charging Document

COUNT XII

That in the Third Judicial District, State of Alaska, on or about April 17, 2017, at or near Anchorage, **STEPHEN JEREMY HICKS** with the intent to mislead a public servant in the performance of a duty, submitted a false written or recorded statement which the defendant did not believe to be true on a form bearing notice, authorized by law, that false statements made in it are punishable. To wit: **JS** moose hunt record.

All of which is a class A Misdemeanor offense being contrary to and in violation of AS11.56.210(a)(2) and against the peace and dignity of the State of Alaska.

37



State of Alaska Big Game Commercial Services Board
Department of Commerce, Community, and Economic Development
P.O. Box 110906, Juneau, Alaska 99811-0906
Telephone: (A - K) (907) 485-2543 (L - Z) (907) 485-2691

HUNT RECORD 35611
(This form must be submitted to the department within 60 days after hunt is completed)

TOP PORTION OF HUNT RECORD MUST BE COMPLETED PRIOR TO HUNT

1 (Please Print) Name of Contracting Registered Guide-Outfitter: Stephen Hicks License #: 1298
Successful Form Will Be Returned For Completion

YOU MUST CHECK ONE: GUIDED TRANSPORTED ONLY OUTFITTED ONLY

2 Client Name: JS Telephone No.: 701.640.3829 Date of Birth: 7/2/52
 Address: Wahpeton ND 58075 City: Wahpeton State: ND Zip: 58075

3 If you leave Ticket/Permit Numbers or Big Game Tag Numbers blank, you are attesting that these items are not required.

HUNTING LICENSE NUMBER	HARVEST TICKET and/or PERMIT NUMBER	BIG GAME TAG NUMBER
<u>6236626</u>	<u>MOOSE: MLE-090679-53</u>	<u>MOOSE: 1603705</u> <u>BEAR: 1605823</u> <u>WLF: 1601039</u>

I hereby certify that the information provided on this form that pertains to my activities are true and correct. (WARNING: A person may also be subject to criminal charges for a violation under AS 11.56.210).

CLIENT SIGNATURE: [Signature] DATE: 10/16/16

BOTTOM PORTION MUST BE COMPLETED AFTER HUNT - EVEN IF HUNT IS UNSUCCESSFUL

4 Name and License Number(s) of Licensed Registered Guide-Outfitter(s), Class-A or Assistant Guide(s), and Pack(s) Accompanying Client in the Field.
 Name: Craig Hill Lic. #: 1748 Name: _____ Lic. #: _____
 Name: Stephen Hicks Lic. #: 1298 Name: _____ Lic. #: _____

5 DATES CLIENT WAS IN THE FIELD: FROM: 10/01/16 TO: 10/14/16 DATE HUNT COMPLETED: 10/14/16 APR 11 2017
 Method of Transportation Used: Aircraft Boat Other: Foot - 4 vehicles CBPL

SPECIES	DATE HUNTED	GUIDE USE AREALB)	EST. LBS OF MEAT RECOVERED	SPECIFIC AREA / LOCATION	SEX OF ANIMAL
					F M
<u>Moose</u>	<u>10-10-16</u>	<u>06-01</u>	<u>550 lbs</u>	<u>White River</u>	<input checked="" type="radio"/> F <input type="radio"/> M
<u>Bear</u>	<u>08-01</u>				<input type="radio"/> F <input type="radio"/> M

MUST BE SIGNED BY THE CONTRACTING REGISTERED GUIDE-OUTFITTER

I hereby certify that I have complied with the communication requirement in 12 AAC 249, that all of the information provided on this form is true and correct, and I am approved to conduct guiding or outfitting activities in the guide use areas) listed. (WARNING: Making a false statement or omitting a material fact is subject to disciplinary action under AS 08.54.719 and 12 AAC 75.210. I understand that it is a Class A misdemeanor under AS 11.56.210(a)(2) to knowingly provide false information on this form.)

CONTRACTING REGISTERED GUIDE-OUTFITTER SIGNATURE: [Signature] DATE: 10-16-16

ORIGINAL: MAIL TO ADDRESS ABOVE PINK COPY: CLIENT YELLOW COPY: FIELD GREEN COPY: GUIDE-OUTFITTER
08-0211 (Rev. 10/2012)

38

STEPHEN HICKS

Case No. 18-0007-001
 Agency No. 2017 001107/
 Agency No. 2018 000181

DECISION

I. Introduction

In the aftermath of a thoroughly miserable October 2017 hunting trip, the Division of Business, Corporations, and Professional Licensing accused Registered Guide Stephen Hicks of maintaining unsatisfactory field conditions; encouraging clients to hunt in a restricted area; misrepresenting his services; engaging in same-day airborne taking of big game; and failing to report violations by other licensed guides – and of doing all of these things while under probation for an earlier licensing violation. At a hearing on the Division’s allegations, the Division met its burden of proving the majority of allegations in its Accusation. Accordingly, and given the serious nature of the violations, this decision recommends that the Big Game Commercial Services Board **REVOKE Mr. Hicks’s license, and impose a fine of \$15,000.**

41

Exhibit #15

Guiding without a license, aid in committing a violation

In May of 2019 HICKS guided client C.S. on a black bear hunt after his guide license as revoked and where C.S. took one bear over his bag limit.

42

**BEFORE THE ALASKA OFFICE OF ADMINISTRATIVE HEARINGS ON REFERRAL
BY THE BIG GAME COMMERCIAL SERVICES BOARD**


In the Matter of)	
)	OAH No. 18-0539-GUI
STEPHEN HICKS)	Agency No. 2017 001107/
_____)	Agency No. 2018 000181

DECISION

IV. Conclusion

The Division met its burden of proving that Hicks engaged in misrepresentations with regard to soliciting hunting clients for the October 2017 hunt, and that, during that hunt, he failed to provide clients with minimally adequate shelter, encouraged clients to engage in multiple violations of state hunting laws, and improperly engaged in same-day airborne hunting. Further, he did all of this while on probation under a consent agreement with the Division. The totality of the circumstances supports a civil fine in the amount of \$15,000, a public reprimand, and revocation of Hicks's registered guide license.

Dated: March 7, 2019


Cheryl Mandala
Administrative Law Judge

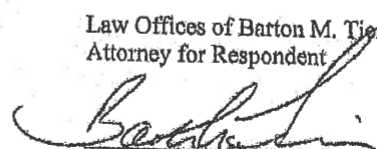
43

Hicks Request to Postpone Revocation

4. In any combination with the options above, revise the proposed enforcement action to not take effect until December 1, 2019. This will allow Mr. Hicks to accommodate clients already booked and invested in their 2019 hunts, and income to pay any civil penalty imposed by the Board.

Dated this 20th day of March, 2019.

Law Offices of Barton M. Tiernan,
Attorney for Respondent


Barton M. Tiernan
ABA No. 9503004

44

2020 State Indictment

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

STATE OF ALASKA,

Plaintiff,

vs.

STEPHEN JEREMY HICKS

[REDACTED]

CRAIG HILL

[REDACTED]

Defendants.

No. 3AN-20- 03959 CR (Stephen Jeremy Hicks)

No. 3AN-20- 04160 CR (Craig Hill)

INDICTMENT

I certify this document and its attachments do not contain the (1) name of a victim of a sexual offense listed in AS 12.61.140 or (2) residence or business address or telephone number of a victim of or witness to any offense unless it is an address identifying the place of a crime or an address or telephone number in a transcript of a court proceeding and disclosure of the information was ordered by the court. The following statute charge a crime involving DOMESTIC VIOLENCE as defined in AS 18.66.990: None.

Count I - AS 08.54.720(a)(16)
Guide W/ Susp. Or Revoked License
Stephen Jeremy Hicks - 001

Count II - AS 08.54.720(a)(16)
Guide W/ Susp. Or Revoked License
Stephen Jeremy Hicks - 002

Count III - AS 08.54.720(a)(16)
Guide W/ Susp. Or Revoked License
Stephen Jeremy Hicks - 003, Craig Hill - 003

45

1 THE GRAND JURY CHARGES:

2
3 COUNT I:

4 That in the Third Judicial District, State of Alaska, on or about May 6, 2019, at
5 or near Anchorage, STEPHEN JEREMY HICKS knowingly provided big game
6 hunting services or transportation services to C CS during the period for
7 which his license to provide that service was suspended or revoked.

8 All of which is a Class C Felony offense being contrary to and in violation of AS
9 08,54,720(a)(16) and against the peace and dignity of the State of Alaska.

46

C.S. Payment and Contract Post Revocation



47

C.S. Payment and Contract Post Revocation

14/02/2019 17:06 "Slickdeals" <no-reply@email.slickdeals.com> <akstidshooter@gmail.com> Slickdeals' Best Deals: Best Buy Members: 10TB WD EasyStore External Hard Drive + 32GB USB Flash Drive at Best Buy 34

14/02/2019 19:09 Stephen Hicks <akstidshooter@gmail.com> <shamrock77@gmail.com> Contract 78

15/02/2019 03:34 "SOCCER.COM" <soccer@email.soccer.com> akstidshooter@gmail.com ATTENTION ⚡ \$20 OFF \$99+ & More... 79

World Class Outdoor Adventures

RESERVATION, CONFIRMATION, AND SERVICE CONTRACT

This contract agreement between World Class Outdoor Adventures & Client named below:

Printed Full Name: _____ of _____

Address _____ City _____ State _____ Zip _____

Home Phone _____ Office Phone _____ Cell: _____

Fax _____ E-Mail Address: _____

CONTRACT AGREEMENT OR OFFER

Trip Time/Dates: June 1-7 2019 Clients per Guide 1

Length of Trip: 7 Days

Trip Area: AKA Cost of Trip: \$ 4,500.00

Primary Species: Black Bear Trophy Fees: None

Other details: All accommodations in the field, which include meals, transportation, lodging under field conditions and any private, state or federal land use fees are included in the trip price. In-field care of meat/fish/trophy is also included in the cost. The client is responsible for cost of licenses and tags, the proper utilization, shipping, processing of any and all meat/fish/trophy from Anchorage. Guide is not responsible for delays due to weather, natural disaster, or emergency closures enacted by Government agencies. All costs incurred for hotel accommodations due to aforesaid delays are client's responsibility. We will try to extend your hunting/fishing days when delays happen, but no promises are made.

48

BLACK BEAR SEALING CERTIFICATE

DEPARTMENT OF FISH AND GAME

NO **0129283**

HIDE SEAL NUMBER **354874**

SKULL SEAL NUMBER **354875**

FIRST NAME **CS** M **CS**

POST OFFICE BOX, ROUTE AND BOX NUMBER, OR STREET ADDRESS
5000 Whispering Creek Lane

CITY **Wichita Falls** STATE **TX** ZIP **76310**

COMMUNITY OF PRINCIPAL RESIDENCE _____ COUNTRY **USA**

DL STATE **TX** DRIVER'S LICENSE (DL) NUMBER OR STATE ID **02530966** DATE OF BIRTH (MM DD YY) **03 12 77**

HUNTING LICENSE NUMBER **9651217** HUNT CONTROL NUMBER **6L000** TICKET/PERMIT NUMBER **0312313-81**

BIG GAME TAG NUMBER **1900199** BAIT STATION PERMIT # _____ DAYS HUNTED **05** GMA/SLUBUNT **6A** AD/FG USE (DUJ) **0202**

DATE OF KILL (MM DD YY) **05 06 19** MOUNTAIN RANGE & DRAINAGE **2 mile west of the mouth of White River**

SPECIFIC LOCATION _____

OTHER INFORMATION:
 TAKEN OVER BAIT (B0)
 INCIDENTAL TAKE (B5)
 HIDE SALVAGED (B7)
 NO MEAT SALVAGED (B8)
 SALVAGED LESS THAN 50% OF MEAT (B9)
 SALVAGED MORE THAN 50% OF MEAT (B9)

COMMERCIAL SERVICES USED:
 1. NONE
 2. TRANSPORT TO FIELD
 3. NON-GUIDED HUNTING SERVICES
 4. REGISTERED GUIDE
 5. LODGE/CAMP
 6. OTHER _____

TRANSPORTATION USED:
 1. AIRPLANE
 2. HORSE/DOG TEAM
 3. BOAT
 4. WHEELER
 5. SNOW MACHINE

METHOD OF TAKE:
 1. Firearm
 2. Archery
 3. Other
 4. Snare

TATTOO/MARKS:
 YES
 NO

SEX IDENTIFIERS:
 1. PENIS SHEATH
 2. VAGINAL ORIFICE
 3. TESTS
 4. NONE

SEX:
 1. MALE
 2. FEMALE
 3. UNKNOWN

COLOR:
 1. BLACK
 2. CINNAMON
 3. GLACIER BLUE

SPECIMENS COLLECTED:
 TOOTH
 SKULL
 HAIR
 HIDE
 CARCASS
 OTHER **None**

COMMENTS: (Marked bear ear, tattoo, radio numbers, etc.)
830-928-6761

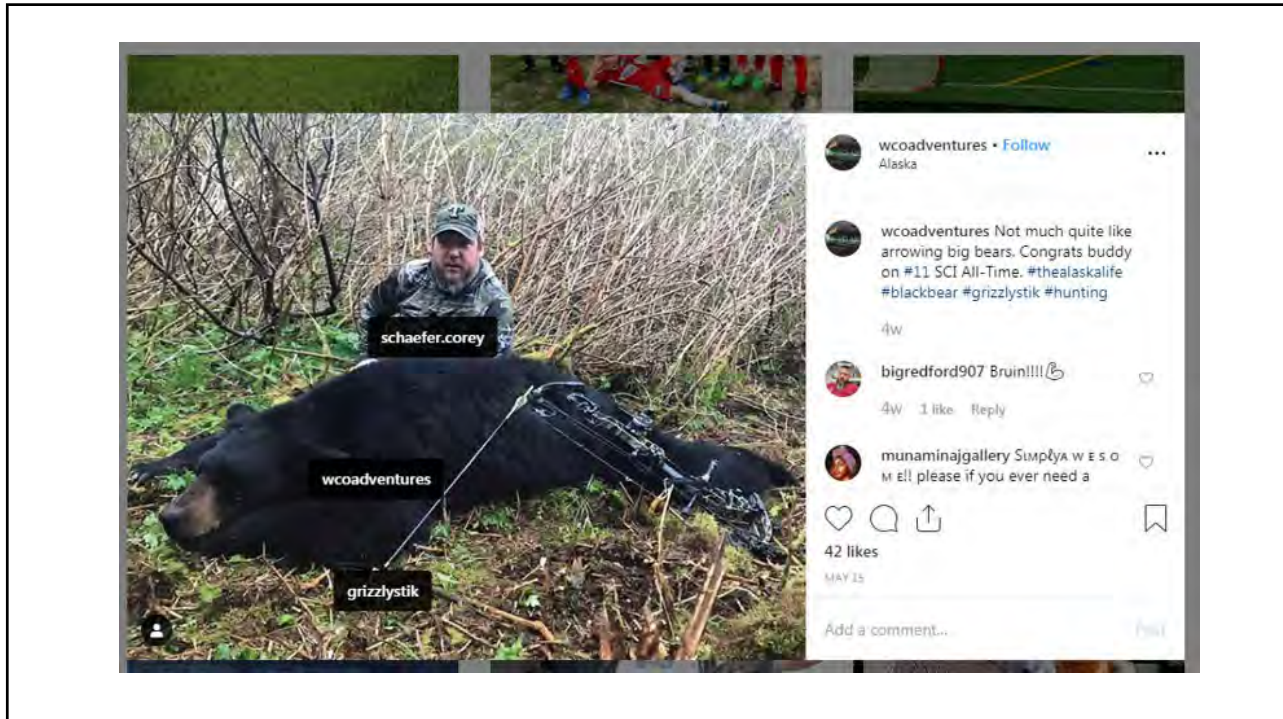
I HEREBY CERTIFY THAT THE INFORMATION PROVIDED HEREIN IS ACCURATE AND TRUE.
(FALSIFICATION OF INFORMATION ON THIS FORM IS PUNISHABLE UNDER AS 11.56.2100.)

GUIDED HUNT: YES NO
(SECOND-DEGREE KINDRED GUIDED HUNT (B0))

I HEREBY CERTIFY THAT THE INFORMATION PROVIDED HEREIN IS ACCURATE AND TRUE.
(FALSIFICATION OF INFORMATION ON THIS FORM IS PUNISHABLE UNDER AS 11.56.2100.)

GUIDE SIGNATURE (REQUIRED) _____

49



50

Except from Trooper Incident Report

Incident: AK19033834

Incident Type: Wildlife Call [WILD]

Incident time: 05/24/2019 14:32 -

Reported time: 05/24/2019 14:32

Incident location: 333 RASPBERRY ROAD, ANCHORAGE, AK USA 99518 (ANCHORAGE ADF&G)
(Beat/zone: UANC, ANCHORAGE)

Incident status: Closed referred to DAO

Summary: Trp. Morrisett reported that on May 13th, 2019, he saw Stephen J. Hicks with people at the bear sealing area at ADF&G. Hicks' registered guide license is currently revoked, he was served with the revocation order on April 9th, 2019, at his residence. I obtained the sealing records from ADF&G for that day. One of the hunters was from Texas, [REDACTED] CS [REDACTED], reported killing a black bear in GMU 6 near the White River on May 6th, 2019. The form had cross-outs where the hunter initially reported he had a registered guide and it was a guided hunt. Investigation continues.

51

C.S. Interview

SA Bryant turned the focus back to the spring 2019 hunt and asked about the money exchange.

[REDACTED] CS [REDACTED] and Hicks had agreed he would pay \$5,000 for the black bear direct to Hicks. The plan originally was to shoot a big brown bear, but Hicks lost his license and the plan changed. According to S [REDACTED] CS [REDACTED] fee was about normal for a black bear, but would have been a great discount on the brown bear. Schaefer advised he had already paid Hicks the deposit for the spring hunt prior to learning about his license. [REDACTED] CS [REDACTED] couldn't remember how much he had given for the deposit and stated that he might have paid for the whole thing at that time. The payment would have been in a check and there should be record of it. [REDACTED] CS [REDACTED] had [REDACTED] CS [REDACTED] clarify the sequence of events. [REDACTED] CS [REDACTED] agreed that he planned to hunt brown and black bear with Hicks, paid Hicks for the hunt prior to coming to Alaska, found out about the license issue and then came to Alaska anyway to hunt black bear. [REDACTED] CS [REDACTED] again stated he hunted on his own without Hicks as he did not need a guide to hunt black bear. SA Bryant asked if he used Hicks' cabin and other facilities as well as paid for Hicks' airfare one way. [REDACTED] CS [REDACTED] agreed, but stated the airfare was for the tip from last years hunt.

The 2019 bear was east of the cape around five to seven miles down the beach. He advised he got to the location by four wheelers. He had been cruising looking for tracks and saw a black spot farther up. He knew it was a black bear, but was not sure how big it was. He moved up to about two hundred yards away and the bear was walking away from him. He was able to close to within about forty yards but had no good shot. [REDACTED] CS [REDACTED] indicated he "shot it up the ass" and it started running around. He grabbed a 450 bushmaster and put a round in it. It ran up over the embankment and then died. It took one shot with the arrow and one shot with the rifle. The bear went only about fifteen yards and he confirmed it was dead. He went back to the cabin and brought everyone back to skin out the bear. The bear was skinned and cleaned at the location it died. Schaefer advised he chose the hunt location and it was morning when he shot the bear. He and Hicks skinned the bear. [REDACTED] CS [REDACTED] put the tag on the hide immediately. They gave the meat to the miner "Richard". Half of the meat was left in the field. They filled out the transfer of possession form for the meat to go to Richard. Schaefer stated he filled out his own paperwork for the hunt and did not need help. He advised that he didn't think this was all a big deal and it was just a "buddy hunt".

52

Texts between HICKS and C.S.

- [REDACTED] cs "Ok, I gotcha. So we are good for black bear but not brown on this trip then. Eric said that Ovis called him."
- Hicks "Ahh. Yeah we good black only in spring just on buddy deal. We can talk about when you here or give me a call. I can have Craig do the black bear just through orvis I'm sure but Eric never calls me back so stopped even trying. He hadn't called me back for months."

53

Exhibit #16

Guiding without a license, aid in committing a violation

In May of 2019 HICKS guided client H.R. on a black bear hunt after his guide license had been revoked.

54

2020 State Indictment

1 IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
 2 THIRD JUDICIAL DISTRICT AT ANCHORAGE
 3 STATE OF ALASKA,
 4 Plaintiff,
 5 vs.
 6
 7 STEPHEN JEREMY HICKS
 8 [REDACTED]
 9 [REDACTED]
 10 CRAIG HILL,
 11 [REDACTED]
 12 [REDACTED]
 13 Defendants.
 14
 15 No. 3AN-20-03959 CR (Stephen Jeremy Hicks)
 16 No. 3AN-20-04102 CR (Craig Hill)
 17
 18 INDICTMENT
 19 I certify this document and its attachments do not contain the (1) name of a victim of a sexual offense listed in AS 12.61.140 or (2)
 20 residence or business address or telephone number of a victim of or witness to any offense unless it is an address identifying the place of a
 21 crime or an address or telephone number in a transcript of a court proceeding and disclosure of this information was ordered by the court.
 22 The following counts charge a crime involving DOMESTIC VIOLENCE as defined in AS 11.66.900. Name:
 23 Count I - AS 08.54.720(a)(16)
 24 Guide W/ Susp. Or Revoked License
 25 Stephen Jeremy Hicks - 001
 26 Count II - AS 08.54.720(a)(16)
 27 Guide W/ Susp. Or Revoked License
 Stephen Jeremy Hicks - 002
 Count III - AS 08.54.720(a)(16)
 Guide W/ Susp. Or Revoked License
 Stephen Jeremy Hicks - 003, Craig Hill - 003

55

10
 11
 12
 13
 14
 15
 16
 17

COUNT II:

That in the Third Judicial District, State of Alaska, on or about May 6, 2019, at
 or near Anchorage, STEPHEN JEREMY HICKS, knowingly provided big game
 hunting services or transportation services to [REDACTED] during the period for
 which his license to provide that service was suspended or revoked.
 All of which is a Class C Felony offense being contrary to and in violation of AS
 08.54.720(a)(16) and against the peace and dignity of the State of Alaska.

56

HICKS GMAIL — HR HR HUNTS

01/02/2019 11:57	"Fresh Start Tax" <services@online...>	aksidschooter@gmail.com	Get a Free Evaluation Now...	7
01/02/2019 12:41	Prime Video <store-news@amazon...>	aksidschooter@gmail.com	Prime member: here's your weekly Prime Video guide	100
01/02/2019 14:10	"GCI Wireless" <rcs@gci.com>	"Steve Hicks" <aksidschooter@gmail.com>	Get a Apple Watch on us, and screen the love.	48
01/02/2019 14:17	BodyGuardz Customer Care <sup...>	Stephen Hicks <aksidschooter@gmail.com>	Your BodyGuardz.com Order Has Shipped!!	67
01/02/2019 14:51	Stephen Hicks <aksidschooter@gmail.com>	Harold Rank <brank@aol.com>	Alaska Combo Hunt 2019/2020	17
01/02/2019 14:52	Stephen Hicks <aksidschooter@gmail.com>	Rick Duffly <rduffy@barimobpost.com>	Fwd: Alaska combo hunt 2019/2020	9
01/02/2019 15:30	Send Lake Elementary School <st...>	Send Lake Elementary School Res...	Send Lake Yearbook-Buy online today!	7
01/02/2019 15:30	"CBS All Access" <calaccess@cbn...>	aksidschooter@gmail.com	Last chance for 50% off!	24
01/02/2019 15:47	Anchorage Youth Soccer Club via...	aksidschooter@gmail.com	game Tomorrow	8
01/02/2019 15:49	Anchorage Youth Soccer Club via...	aksidschooter@gmail.com	game	8

Subject: Alaska combo hunt 2019/2020
Date: 01/02/2019 14:51 **From:** Stephen Hicks <aksidschooter@gmail.com> **To:** Harold Rank <brank@aol.com>

Below is the breakdown of the hunt we discussed last week. Once we sort everything out then I'll put it in a contract and we can lock everything in from there.

Combo Hunt for one or two years however it works out.

Species will be moose, Brown bear, black bear and mtn goat. Wolf and Wolverine free if we see them.

We can do something like what I suggested on phone, come down in September 2019 and hunt for 2 weeks then depending on schedules either come back in October 2019 for 2 weeks for the remaining half of the hunt or come back in 2020 to finish up the 2 weeks.

Hunt cost: \$40,000.00
 4 species with 30 days in camp to hunt.

Flights to/from camp, license tags and tips not included.

***Breakdown of full price costs per species and extra days just as a reference:

Moose: \$22,000
 Brown B \$18,000
 Black B \$5,500
 Goat \$13,000

\$550 per additional day in camp.
 Combo Hunt would normally be booked at 14 days. So 14 additional days @ \$550 p/d would be \$7,700.

Understanding this hunt will be Archery, we are looking for legal respectable animals but obviously will hunt for the best we can find with the amount of time given. Hunt will be any and/or all methods we use and will be legal methods only!!!

Deposit will be \$25,000 this year to confirm the hunt then if you come back in October the balance will be due then or if you don't come back till fall of 2020 then balance will be due by January of that year.

Let me know if I missed anything or need to discuss details. Looking forward to finals getting you here my friend!!! It will be a great adventure for us both!!

57

C.S. Interview Re: H.R.

CS thought he must have made the plans to come back to Alaska a couple months prior to the hunt. CS stated they had planned to try to get a black bear and a brown bear. Once he got to Alaska he bought his bear tag and license at Sportsman's Warehouse, in Anchorage. Hicks was with him at the time and drove him to the store in Hicks' company truck. CS advised he stayed at Hicks' house prior to the hunt and then at a hotel after the hunt. Schaefer stated F HR SID AK9177008 was with him and Hicks on the 2019 hunt. He stated he has talked HR every once in a while since HR is big into Safari Club International. They knew of each other because they are both on the SCI record book. HR accompanied them out to Yakutaga. HR and Hicks were together while CS hunted by himself. CS indicated HR was "not too keen" on doing what he did (hunting alone). Schaefer advised he prefers to hunt alone. At Sportman's Warehouse, CS paid for the items by credit card.

58

Exhibit #2

Illegal Sale of Wildlife, Commercial Operations without a Permit

In 2015 HICKS conducted a commercial (for compensation) trip in Denali National Park without a permit.

59

Facebook Business Record
Page 10793

Deleted false

Body Oh good

Recipients M [REDACTED] (100012989585005)
Stephen Hicks (1646300472)

Author Stephen Hicks (1646300472)

Sent 2017-01-02 13:02:46 UTC

IP 107.77.205.20

Deleted false

Body I was flying clients into sheep hunt and wrecked on way out by myself



60

Contract with P.G. and Others, Truck for Hunts

VPA re: 2015 Ford F-250 VIN 1FT7W2B6XFEB88502

PG PG (Seller)

CONTRACTUAL AGREEMENT

B. DESCRIPTION OF THE ACQUIRED SERVICES

- a. Sheep Hunt 2015: PG will be entitled to go on a sheep hunt in the state of Alaska in 2015 as offered through World Class Outdoor Adventures, company owned and operated by Hicks. PG will be responsible for all applicable licenses and tags necessary in the state of Alaska for PG to partake in said sheep hunt. Parties recognize and acknowledge that PG has paid \$5,000.00 deposit and the

61

Interview with R.R. Re: P.G. in 2015

2598 Q: Okay. I don't know a whole lot about that. Was - was PG hunting on that
2599 trip?
2600 (Audio Time 1:01:53)
2601 A: He didn't hunt. He says all I could do was sit there and watch them.
2602
2603 Q: Oh was - was the purpose of that trip for him to hunt?
2604
2605 A: Yeah. Dall sheep.
2606
2607 Q: Okay. All right.
2608
2609 A: He said - he told me he could see 'em on the mountainside, but he knew he
2610 couldn't hunt 'em.

2611
2612 Q: Because he wasn't sure how he was gonna get outta there?
2613
2614 A: No, he didn't have a guide.
2615
2616 Q: Oh, gotcha.
2617
2618 A: He's not a resident, so you have to have a guide.
2619

62

Facebook Business Record
Page 4298

Deleted

false

Body Not really sure my friend I no recollection of the crash just woke up on the ground in the plane after. My guess is clipped some trees and it sucked me into them but who knows.

I'm ok busted up lower leg real bad still in hospital and have two more surgeries to go yet be about a year or more recovery. Worst part is didn't have insurance on plane so I have to rebuild it out of pocket. Still doing most of my hunts but canceled a few. Had some monster sheep ready to hunt and had to cancel that's whT I was doing that day was dropping off sheep hunters. We did kill a couple good ones though. Try to move into my new house on top of all this so kinda stressed out a bit but I'm getting it all done bud! Keep in touch. Let me know when you're ready to kill some big shit I have some huge moose located we should be in on them next few weeks but had some 40+ inch sheep this year too. I'll save you one!

63

HICKS Plane in the Denali Preserve via Facebook, 2015 Sheep Hunt

Stephen Hicks
August 4 at 10:49pm Anchorage AK

First camps are in for the upcoming sheep season. It was a beautiful day for flying and we had a blast. We have some great sheep located so keep an eye out for more pics soon!

Photo!



29 Likes 1 Share

64

Discussion of Sheep Hunting Plans and Locations with R.H.

Author Stephen Hicks (1646300472)

Sent 2014-08-15 05:45:05 UTC

Body I'm sheep hunting right now

Author [REDACTED] (100004264567304)

Sent 2014-08-15 06:54:01 UTC

Body Good luck !!! 4 sure when it's good time and how much?

Author Stephen Hicks (1646300472)

Sent 2014-08-15 21:59:18 UTC

Body Bear drop roughly around 2000-2500 all depends on the flying

Author [REDACTED] (100004264567304)

Sent 2014-08-15 22:54:59 UTC

Body How bout sheep?

Author Stephen Hicks (1646300472)

Sent 2014-08-16 17:13:45 UTC

Body About same depends on where we go

65

Author [REDACTED] (100004264567304)

Sent 2014-08-16 17:17:31 UTC

Body When du u think it's good time?

Author Stephen Hicks (1646300472)

Sent 2014-08-16 17:18:11 UTC

Body Rest of month or sept 5ish to 11ish

Author [REDACTED] (100004264567304)

Sent 2014-08-16 17:19:24 UTC

Body U think sept 5 to 11 it's good time?

Author [REDACTED] (100004264567304)

Sent 2014-08-16 17:20:21 UTC

Body What area u recommend so I can look in the map what I'm getting in to



Facebook Business Record

Page 22330

Author

Stephen Hicks (1646300472)

Sent 2014-08-16 17:21:13 UTC

Body Alaska range mystic pass area



66

Exhibit #11

Illegal Take, Sale, Transport, Same Day Airborne

In October of 2017 HICKS guided client A.T. and they took a moose the same day they were airborne.

67

Interview with C.L., HICKS' Packer

2020 A: Um, My memory of it, because I was kinda left in the dark and then they
2021 quickly kinda told me that - that they had - (Angelo) had shot one.
2022
2023 Q: Okay. And from what you remember they had been in the air in (Doug
2024 Zweifel)'s plane that day?
2025 Audio time 1:10:00
2027 A: Ahh..
2028
2029 Q: That they shot the moose?
2030
2031 A: Correct.
2032
2033 Q: Okay.
2034
2035 A: Yeah. It would've been the same day as flying.
2036

68

906 Q: Okay.
 907
 908 A: Um, so I was, like, all right well I guess that's good news. And then, you
 909 know, then they told me that they did.
 910
 911 Q: Okay, and it was your understanding at that point that that was illegal. They
 912 shouldn't have hunted the same day they were airborne.
 913
 914 A: Yeah.
 915
 916 Q: Okay.

69

Summary of Photos and Locations, A.T. Same Day Airborne Moose

16-Oct 9:27a	20171016_092715.jpg	Photo	SAMSUNG-SM-G870A	RR	Regal Air
16-Oct 10:42a	20171016_104121	Video	<i>no metadata</i>		Takeoff from ANC
16-Oct 12:04p	20171016_120452.jpg	Photo	SAMSUNG-SM-G870A	PG AT RR	En route Regal Air
16-Oct 12:46p	20171016_124653.jpg	Photo	SAMSUNG-SM-G870A	AT	Sitting in Zweifels plane
16-Oct 1:07p	20171016_130747.jpg	Photo	SAMSUNG-SM-G870A	na	Aerial photo out of plane-bushwheel
16-Oct 1:49p	20171016_134936.jpg	Photo	SAMSUNG-SM-G870A	na	on gravel bar
16-Oct 2:00p	20171016_140022.jpg	Photo	SAMSUNG-SM-G870A		At cabin
16-Oct 2:59p	20171016_145916.jpg	Photo	SAMSUNG-SM-G870A		Wolf tracks in the sand
16-Oct 4:53p	IMG_2127.jpg	Photo	iPhone 6s	CL	Aerial photo out of plane-right, full plexiglass door, bushwheel
16-Oct 4:53p	IMG_2129.jpg	Photo	iPhone 6s	CL	Aerial photo out of plane-left, guncase
16-Oct 6:14p	CC0011.MP4	Video	Sony FDR-AX53	Moose [Hicks voice]	plane noise in background at 1:20
16-Oct	CC012.MP4	Video	Sony FDR-AX53	Moose [Hicks voice] "DRAW, DRAW...lie down"	at 1:45
16-Oct 6:23p	C0013.MP4	Video	Sony FDR-AX53	Moose AT [Hicks voice] "take em"	AT bow shot at moose
16-Oct 6:24p	C0014.MP4	Video	Sony FDR-AX53	Moose AT [Hicks voice]	AT follow-up shot at moose

70



71

Exhibit #12

Illegal Take, Sale of Brown Bear, Use of Bait, No Permit

In October of 2017 HICKS directed client A.T. to take a brown bear over bait without the proper permit and tag and concealed the illegal take by not reporting it as required.

72

Interview with A.T.

170 Q: Okay. Um, so in the licenses and the tags, what did he tell you?
 171
 172 A: Um, he told me to get all three of them, um, for the bear, the - the goat and
 173 the, ah, moose. But I decided not - I asked him about, you know, getting a big
 174 bear because I already shot a - the, ah, black bear.
 175
 176 Q: Okay.
 177
 178 A: And I wanted a brown bear. I wanted a big one.

 182 A: And he said at that time of year they weren't gonna be very big so I decided
 183 not to get the, ah, the bear tag.
 184
 185 Q: Okay.
 186
 187 A: And he said if - if there's one I have, like his tags, if - if there's one that you
 188 like or whatever you want to shoot he - he would give me, ah, one of his tags.
 189

73

784 A: And I'm like waking up, holding the revolver, and like, "What's going on?
 785 What's going on?" He's like, "There's a huge bear out there. Shoot it." "I
 786 don't have a tag." And he's like, "It's okay. I have a tag. We'll tag it." And I
 787 was like, "Okay." So I - I cocked the gun. I sat up on the cot. And I'm in long
 788 johns. Um, I sit up on the cot and he's - he's like, "You're not gonna shoot it
 789 from there. You have to get up." So I - I put the - the hammer down and I get
 790 up and I kind of - because I had to sleep in my - one of those mummy sleeping
 791 bags, so I just rolled it to my waist and I kind of rolled off and I walked - kind
 792 of walked out of it as I'm holding the gun. And it was - it was - it was real
 793 early. It was like 5:30, 6:00. So there wasn't - the sun wasn't up but there was
 794 a little bit of light, you know. And, um, he - he looked through the - through
 795 the window. He just popped his head a little bit and he came down and he's
 796 like, "He's eating a can of beans. He's eating a can of beans." He's
 797 whispering at me. So he cracks the door open and I could see the bear. You
 798 see the handrail here?

74

815 And, ah, and then, ah, we were sitting there waiting, waiting. And then the
 816 bear kind of turns, playing with the can. And when he turned, um, he had his
 817 head down and I could - I could clearly see his head playing with the can.
 818 And, um, he's like, "Shoot it center of mass. Shoot it center of mass." So I
 819 picked up the - the gun and when the bear had his head down I just aimed for
 820 this right here, and baboom, I shot it. And the bear, ah, jumped up, did one of
 821 these and he went around the cabin. Um, like this is - this is the cabin, right,
 822 and the barn is right here. So the - the bear's in the front.

75

Interview with C.L., Packer for HICKS

3323 A: Um, yeah, one of those, uh, silver revolver. And, uh, I think he - I don't know
 3324 if [REDACTED] was already awake or he woke him up or whatever, uh, but there
 3325 was kinda commotion and I remember I sat up and he was like, "Bear, bear
 3326 here"" And, uh, (Steve) was like, "[REDACTED] take this and shoot it." And, uh,
 3327 [REDACTED] was, like, in his boxers or something I think. And, you know - I
 3328 don't know. I think it - it was right outside the cabin I think.

3372 A: A loud bang, um, I - I wanna say (Steve), like, was, like, pushin' him to kinda
 3373 do it or like, "Come on," and, um, I don't know if, you know, it was whatever
 3374 - big enough for [REDACTED] or, like, what he wanted. But, anyway, I just
 3375 remember (Steve) telling [REDACTED] to do it or...

3389 Q: Any discussion, uh, whether or not, uh, [REDACTED] had purchased or
 3390 acquired tags or licenses to shoot a bear?

3392 A: Um, I don't know if he had, uh, the correct tag or licenses. Um, I do
 3393 remember after that their - that (Steve) and [REDACTED] had talk- I think
 3394 [REDACTED] or whatever was like, "I don't want it," and, you know, whatever.
 3395 Um, which I don't know if he, you know, you get, like, you can only have one
 3396 bear a year or something, uh, and he either wanted a bigger one or different
 3397 one or what the dynamic was but I remember there was something and (Steve)
 3398 was like, "Oh, I'll put it on my tag." Um, and so I remember they were kinda -
 3399 there was somewhat passing the buck back and forth.

76



77

Exhibit #13

Illegal take of Mountain Goat, non-resident hunt
without a guide present

In October of 2017 HICKS directed client P.G. to take a
mountain goat without a guide present.

78

Interview with C.L., HICKS' Packer

4062 A: Well yeah, I think that's me, uh, next to him.
 4063
 4064 Q: Is that your laughter?
 4065
 4066 A: I think so.
 4067
 4068 Q: Okay.
 4069
 4070 A: I don't think that - it sounds like him saying, "Awesome."
 4071
 4072 Q: Okay.
 4073
 4074 A: Um, but yeah.
 4075
 4076 Q: Was Stephen Hicks actually there for that or was the laughter, um, in re -
 4077 regards to him actually not being there?
 4078 *Audio Time 2:31:05*
 4079 A: Yeah. Um, I don't think (Steve) was there. Um, I think, you know, that
 4080 [REDACTED] PG [REDACTED] was makin' a sarcastic joke there...

79

3702 Q1: And then I have same question for [REDACTED] PG [REDACTED] do you remember the
 3703 circumstances surrounding when he shot his goat and then where Hicks
 3704 woulda been...
 3705
 3706 A: Uh...
 3707
 3708 Q1: ...at that time?
 3709
 3710 A: I don't believe that (Steve) was with us when, uh, [REDACTED] PG [REDACTED], uh, shot his goat.
 3711
 3712 Q1: Mm-hm. Where do you think he was at?
 3713
 3714 A: I think (Steve) - (Steve) was in the cabin I think.
 3715
 3716 Q1: The bottom most cabin back at the beach?
 3717
 3718 A: Yeah. My main memory of that is, uh, once it was retrieved, uh, taking

80

Interview with R.R.

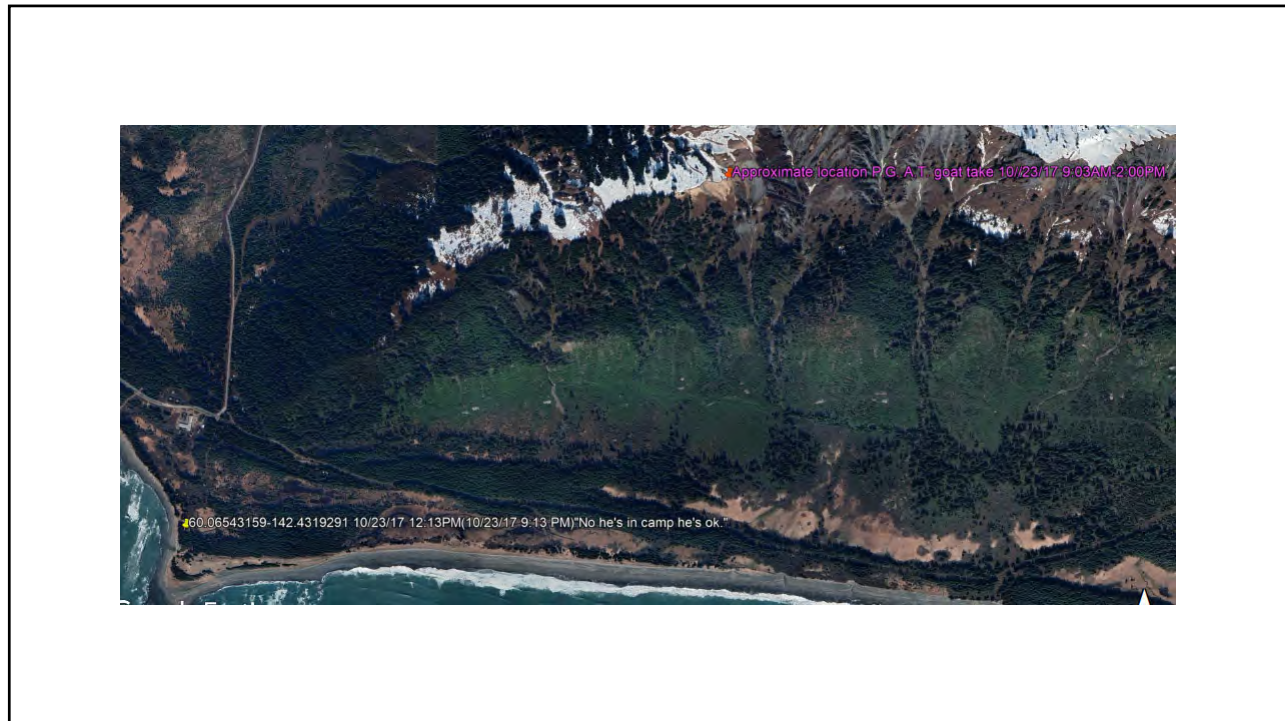
896 Q: Okay. Um, when [REDACTED AT] [REDACTED CL] and [REDACTED PG] went up the mountain to get
897 goats, um, after the bear, kind of the second time that people went up the
898 mountain to get goats, uh, did (Stephen Hicks) go with him?
899
900 A: No.

81

Excerpt From the Truck Contract

- d. Mountain Goat Hunt 2017: [REDACTED PG] will be entitled to go on a mountain goat hunt in the state of Alaska in 2017 as offered through World Class Outdoor Adventures, company owned and operated by Hicks. [REDACTED PG] will be responsible for all applicable licenses and tags necessary in the state of Alaska for [REDACTED PG] to partake in said mountain goat hunt. This mountain goat hunt will be fully guided by World-Class Outdoor Adventures.

82



83

Summary of Photos Videos, P.G. and A.T. Goats

19-Oct 1:05p	C0018.MP4	Video	Sony FDR-AX53	Goodpaster, Lillis	On mountain at treeline
20-Oct 10:30a	20171020_103002.jpg	Photo	SAMSUNG-SM-G870A	Rodriguez, Hicks	Inside Hut w camping gear
20-Oct 11:29a	AST SAR Report				Report says [REDACTED] broke ankle
20-Oct 12:14p	IMG_2146.jpg	Photo	iPhone 6s [REDACTED] CL	[REDACTED] AT	Inside Hut w camping gear
12:15p	IMG_2149.jpg	Photo	iPhone 6s [REDACTED] CL	[REDACTED] AT	Inside Hut w camping gear, Woodstove going
20-Oct 2:51p	20171020_145148.jpg	Photo	SAMSUNG-SM-G870A	na	On beach
20-Oct 3:32p	AST SAR Report				REPORT says [REDACTED] RR [REDACTED] PG [REDACTED] down mountain
22-Oct 9:21a	20171022_092150.jpg	Photo	SAMSUNG-SM-G870A	Bear [REDACTED] AT	Bear trophy photo
23-Oct 9:03a	20171023_090331.jpg	Photo	SAMSUNG-SM-G870A	[REDACTED] PG [REDACTED] CL	[REDACTED] PG walking up ridge [REDACTED] CL head with binos]
23-Oct 9:10a	C0019.MP4	Video	Sony FDR-AX53	Goat: [REDACTED] PG	[REDACTED] PG 2 shots at goat, goat down
23-Oct 9:23a	20171023_092336.jpg	Photo	SAMSUNG-SM-G870A	[REDACTED] AT [REDACTED] CL	with mountains in background
23-Oct 9:24a	20171023_092422.jpg	Photo	SAMSUNG-SM-G870A	[REDACTED] AT [REDACTED] CL	with mountains in background
23-Oct 10:15a	C0024.MP4	Video	Sony FDR-AX53	[REDACTED] AT [REDACTED] CL	[REDACTED] AT on a stalk of of goat, Steve Hicks siting here next to me"
23-Oct 10:28a	C0025.MP4	Video	Sony FDR-AX53	[REDACTED] AT [REDACTED] CL	[REDACTED] AT bow shot at goat, [REDACTED] PG rifle shot aft [REDACTED] AT misses
23-Oct 10:30a	C0026.MP4	Video	Sony FDR-AX53	[REDACTED] AT [REDACTED] CL	[REDACTED] CL trophy shot with goat
23-Oct 11:36a	20171023_113633.jpg	Photo	SAMSUNG-SM-G870A	Goat: [REDACTED] AT [REDACTED] CL	[REDACTED] AT trophy shot with goat
23-Oct 11:38a	20171023_113832.jpg	Photo	SAMSUNG-SM-G870A	Goat: [REDACTED] AT [REDACTED] CL	Goat (skinned) trophy shot
23-Oct 2:00p	20171023_140006.jpg	Photo	SAMSUNG-SM-G870A	[REDACTED] PG [REDACTED] AT	Posing below treeline
23-Oct 2:52p	20171023_145244.jpg	Photo	SAMSUNG-SM-G870A	[REDACTED] PG [REDACTED] AT	
26-Oct 2:26p	20171026_142643.jpg	Photo	SAMSUNG-SM-G870A	na	Regal Air plane being loaded at Yakataga

84

Exhibit #18

Illegal Sale of Wildlife, Guiding Without A License

In September of 2019 HICKS guided two moose hunters after his license had been revoked.

85

Excerpt from HICKS' Airplane Contract with E.P. and C.C.

CONTRACTUAL AGREEMENT

THIS AGREEMENT is made this 11th day of June, 2018, by and between [REDACTED] EP a private party (hereinafter known as "Pears"), [REDACTED] CC CC (hereinafter referred to as "CC"), and, *STEPHEN HICKS*, a separate private party (hereinafter known as "Hicks"). [REDACTED] EP CC and Hicks shall collectively be known herein as "the Parties."

86

Excerpt from HICKS' Airplane Contract with E.P. and C.C.

NOW THEREFORE, THE PARTIES AGREE AS FOLLOWS:

DEFINITIONS

A. Fully Guided Hunt: defined as all-inclusive, no additional fees, hunt guided 1 X 1 (one hunter per guide) by World Class Outdoor Adventures or a registered Alaskan hunting guide. Hunter is responsible for tags, license and charter flight in and out of southeast camp for partaking in the type of hunt being handled. World Class Outdoor Adventures is responsible for all other additional costs.

2. **Hunter:** defined as the individual who is participating in the hunt.
3. **Moose Hunts:** as defined as a hunt for moose offered through World Class Outdoor Adventures. Said hunt shall be a minimum of ten (10) days in length.
4. **Goat Hunts:** as defined as a hunt for goat offered through World Class Outdoor Adventures. Said hunt shall be a minimum of seven (7) days in length.
5. **Brown Bear:** as defined as a hunt for brown bears offered through World Class Outdoor

87

Excerpt from HICKS' Airplane Contract with E.P. and C.C.

A. DESCRIPTION OF THE ACQUIRED

- a. **EP** will deposit \$30,000 into escrow
- b. **CC** will deposit \$30,000 into escrow
- c. Money will be released when desired aircraft is acquired
- d. acquired aircraft will be securitized through FAA filing, naming **EP** and **CC** as lien holders and will immediately transfer to Hicks upon completion of hunts

88

C.C. Payment to HICKS

Wire Transfer Services
Outgoing Wire Transfer Request

WELLS FARGO

Today's Date: 06/29/2018
 Banker Name: RTMO, MICHELLE C
 Banker Phone: 352/331-8239
 Branch Number: 11028
 Banker A/I: 0066722
 Banker M/C: 23021 010

Wells Fargo Reference Number: 090046712100604466
 Office/Fund/Value Number: 10552

Outgoing wires can only be sent for Wells Fargo customers. Provide the Customer Copy to the customer ensuring you give them the Wire Transfer Agreement on pages 3 and 4. Note: Wells Fargo Wire Transfer Services will route wires based on correspondent banking relationships. See the Wire Transfer Information for explanations of the Mexican CLAB number, the SWIFT BIC, the International Routing Code (IRC), Indian Financial System Code (IFSC) and the International Bank Account Number (IBAN).

Originator's Information

CC	CC	Street Address:	1493 SW 188TH ST	
Primary ID Type:	Primary ID Description:	Address Line 2:		
0111	0682-138-77-291-0	Address Line 3:		
Primary ID Iss/Exp/Phn:	Primary ID Issue Date:	Primary ID Expiration Date:	City:	State:
FT	08/01/2013	08/31/2022	DEARBORN	MI
Secondary ID Type:	Secondary ID Description:	Secondary ID Issue Date:	Secondary ID Expiration Date:	Country:
PTM	PTM (M) (M) (M)			US
Secondary ID Status/Country:	Secondary ID Issue Date:	Secondary ID Expiration Date:	ZIP/Postal Code:	Home Phone:
			32669-4751	Business Phone:
			517-472-4901	

Wire Amount and Source of Funds

Origin A/C:	Amount (US Dollars):	Detail Wells Fargo Account:	Bank/COD:
DI66R113	\$20,000.00	03639502	163

89

Pears Payment to HICKS

Done July Statement

Bank of America
Your checking account

EP
June 9, 2018 to July 10, 2018

Deposits and other additions

Date	Description	Amount
06/11/18	[REDACTED]	[REDACTED]
06/13/18	[REDACTED]	[REDACTED]
07/02/18	[REDACTED]	[REDACTED]
07/10/18	[REDACTED]	[REDACTED]
Total deposits and other additions		

Withdrawals and other subtractions

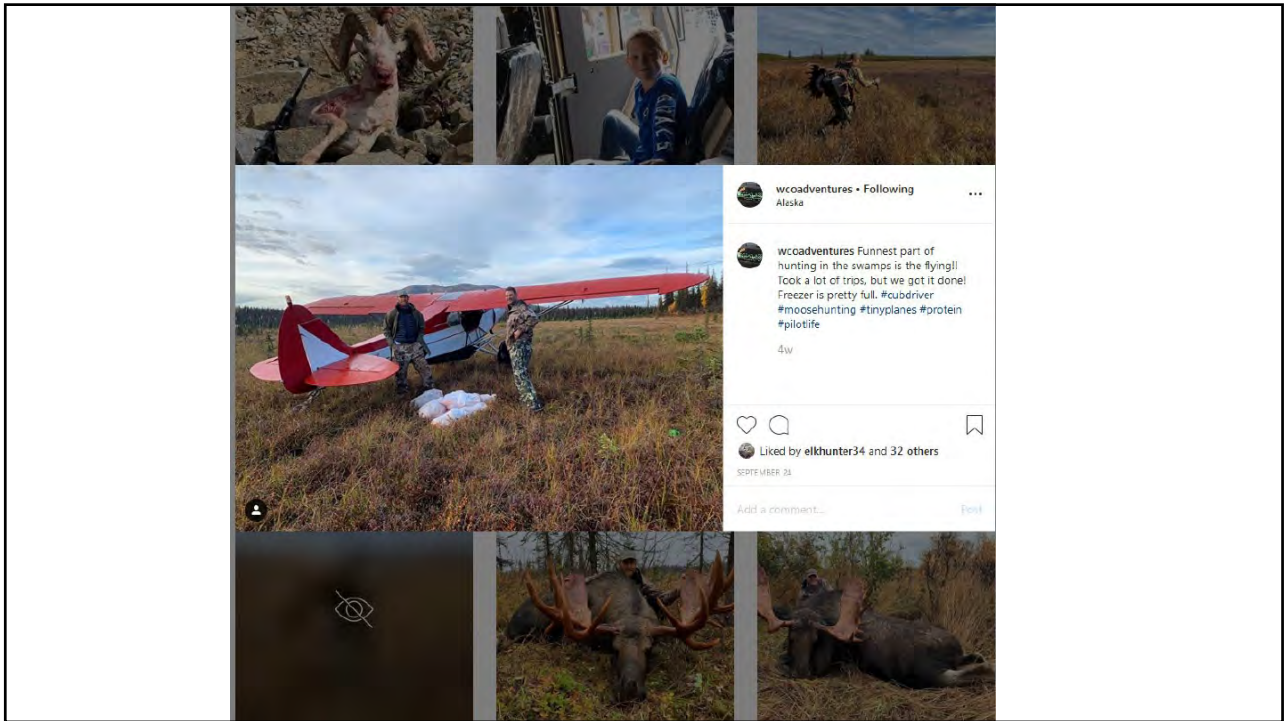
Date	Description	Amount
02/14/18	[REDACTED]	[REDACTED]
06/29/18	WIRE TRANSFER OUT DATE 06/29 TIME 16:32 ET TRN2038629090331 SERVICE REF 03741 000 004799 M. THOMAS CLIENT 1 0110006699 SW BK WELLS FARGO BANK NA ID 125200057 PMT DETUR 2622896 Service	30,000.00
Total withdrawals and other subtractions		-30,000.00

Total withdrawals and other subtractions -30,000.00

90



91



92

Excerpts from Report of Interview, E.P.

REPORT OF INVESTIGATION
Title: WORLD CLASS OUTDOOR ADVENTURES

INV#: 2017705916
Report: 2017705916R017

- The only difference between the 2018 and 2019 hunts with HICKS was [REDACTED] paid for his food and [an air taxi] flight. *(Audio Time 18:14)*
- HICKS told [REDACTED] HICKS lost his guide license and “He said that he can’t hunt until I can get my guide’s license back. But we can kind of go as - do the buddy hunt and be frien- you know. This would be different but we can still hunt.” *(Audio Time 20:22)*
- [REDACTED] and [REDACTED] had not hunted moose before. *(Audio Time 24:00)*
- [REDACTED] and [REDACTED] flew on an air taxi from Lake Hood to Skwentna airport and HICKS flew them in his Super Cub to the hunting camp.
- HICKS picked the spot to camp, Pears did not fly around with HICKS to scout the area.

93

Excerpts from Report of Interview, C.C.

- HICKS was not hunting on the trip.
- HICKS had a rifle.
- HICKS instructed [REDACTED] how to use a moose call [REDACTED] bought. *(Audio time 30:33)*
- Everyone participated in field dressing [salvaging] [REDACTED]’s moose *(Audio Time 31:33)*
- HICKS participated in packing [REDACTED]’s meat back to camp. *(Audio Time 32:46)*
- HICKS flew [REDACTED]’s meat back to Anchorage [in the Super Cub]. *(Audio Time 33:38)*
- HICKS offered to fly [REDACTED] and [REDACTED] to a second hunting spot that HICKS choose. *(Audio Time 35:05)*
- [REDACTED] saw a moose the following morning.
- HICKS judged [REDACTED] moose with binoculars. *(Audio Time 39:05)*
- HICKS agreed it was a legal moose with (3) brow times. *(Audio Time 40:00)*
- HICKS participated in field dressing [salvaging] [REDACTED] moose.
- HICKS flew meat, gear, [REDACTED] and [REDACTED] to Skwentna airport where they dined at the restaurant and called an air taxi.
- [REDACTED] transferred possession of some of his moose meat to HICKS son’s football coach.
- [REDACTED] and [REDACTED] did not shoot moose the same day they were airborne *(Audio time 40:45)*.
- During the 2018 Yakataga and 2019 Moose hunts [REDACTED] and [REDACTED] paid for the air taxi flights. *(Audio Time 48:05)*
- HICKS provided the tent in the field for [REDACTED] and [REDACTED]’s] 2019 moose hunt. *(Audio time 46:15)*
- After the moose hunt, HICKS drove [REDACTED] and [REDACTED] to the ADF&G office, they did not have a rental car, and they stayed at HICKS’ house. *(Audio Time 51:20)*
- Hunter [REDACTED] was with HICKS, [REDACTED] and [REDACTED] in Anchorage and [REDACTED] was going to hunt moose. *(Audio Time 51:41)*

94

Excerpts from Report of Interview, Carlisle

- As to the moose [REDACTED] killed in 2019 fulfilling HICKS' contractual obligation to him, [REDACTED] said: "You know I - I don't - I don't - well that's a good point. It's a valid point I didn't think about it because we just went and did it and I was pleased. I don't know. I haven't - I haven't thought about that. He does - there is still a brown bear that we gotta figure out". *(Audio Time 24:17)*
- "I think the moose is probably done, it doesn't, I suppose your're right, it wasn't a guided moose hunt but I'm pretty content". *(Audio Time 25:03)*
- [REDACTED] and [REDACTED] paid different air taxi companies and used different airports to fly into and out of the field for the 2019 moose hunt.
- HICKS flew [REDACTED] and [REDACTED] in the field in HICKS' plane. *(Audio Time 30:30)*
- HICKS participated in butchering [salvaging] [REDACTED]'s moose in the field and HICKS then flew the meat back to Anchorage. *(Audio Time 32:41)*
- [REDACTED] transported some of his moose meat and the trophy to Florida.
- HICKS and [REDACTED] used Havalon brand knife blades.
- [REDACTED] and [REDACTED] payed for the air taxi charters as part [of the original contract with HICKS]. *(Audio Time 49:44)*
- HICKS provided in the field the one tent the group used. *(Audio Time 52:30)*
- A contract exists describing the agreement [REDACTED] and [REDACTED] entered into with HICKS. *(Audio Time 53:30)*

95

Exhibit #19

Illegal Sale of Wildlife, Guiding Without A License

In October of 2019 HICKS guided client H.R. for moose and brown bear after his license had been revoked.

96

H.R. Payment to HICKS Post Revocation

AlaskaUSA
Federal Credit Union®

Current Date: November 15, 2019
Account Number: 994204533
Capture Date: July 27, 2019
Item Number: 11160001801031
Posted Date: July 27, 2019
Amount: 8,000.00
Record Type: Foreign Item (Not On Us)

HR 4174
DUBLTON, CA 95024-9789
Pay To The Order Of Stephen Hicks \$ 8000.00
eight thousand and 00/100
Bank of America
File # Arnold Raulb
⑆ 124000358⑆ 000994204533⑆ 4174

99

Facebook Messages From HICKS Selling Hunts Post Revocation

Author Stephen Hicks (1646300472)
Sent 2019-07-26 02:00:01 UTC
body Hey buddy!! How goes it?? Good here just getting ready for a sheep hunt for myself then starting moose etc... just got a few things we doing in October in southeast for finishing up schedule. Craig one of my other registered guides is taking over most of contract stuff for me so trying to fill in a couple spots just to make it all work but looking like gonna be good fall so far!! Lots of critters but the weather has been great so that helps!! Got a couple hints can do discounted if you know anyone. Doing moose in rut in October as usual so will come to call. Can do a 2x1 for \$14,000 pp or 1x1 \$15,000 for this year only! Hunters pay own way in and out but I have flights scheduled with multiple people so will be efficient. Can do a 2x1 goat for \$9,500 pp or 1x1 for \$11,500. All the discounted hints hunters pay own flights. Bears on trophy fees Brown for \$7,000 Black \$1,500 All these are just for October 2019. Just trying to book one or two more hunts to I'll some big stuff this year. I'm only doing 1 on there hunt in October other than these. He's a combo hunter for all species and good friend. I'll be there managing camp and flying goofing off. Got some new goat spots for this year as well. Anyway let Me know if you know anyone or can help out! If you want to come down we can sort out a deal for ya!! I'll hunt with you as buddies too!! I'm killing stuff this year!! Lol.

100

Data Logger Flights Log and Timeline

Flight #	Date	Launch Time	Take Off	Land Time	Landing	Notes
1	11-Oct	4:25 PM	Glennallen		Glennallen	Aborted flight from Glennallen to Yakataga due to weather
2	12-Oct	9:10 AM	Glennallen	11:55 AM	Airport	Circled "River Camp" and the cabin location before landing at airport.
3	13-Oct	3:38 PM	Airport	3:46 PM	River Camp	Circled meadows adjacent to the river and landed at "River Camp" for a few minutes
4	13-Oct	3:52 PM	River Camp	4:08 PM	Airport	Left River Camp and circled one meadow before landing back at the airport
5	13-Oct	4:10 PM	Airport	4:15 PM	River Camp	Landed at the airport and then took off a minute or two later before landing back at river camp.
6	13-Oct	4:21 PM	River Camp	4:25 PM	Airport	On the ground at River Camp for 6 minutes then back to airport, circled "Hunt Spot 1" on the approach
7	13-Oct	4:34 PM	Airport	4:39 PM	River Camp	
8	13-Oct	4:56 PM	River Camp	4:59 PM	Airport	On the ground at River Camp for 22 minutes then back to Airport and spends the night
9	14-Oct	12:43 PM	Airport	1:26 PM	Hunt Spot 1	Flew a loop up the upper Yakataga river and a bunch of circles around River Camp and Hunt Spot 1 and the beach before landing at Hunt Spot #1.
10	14-Oct	2:22 PM	Hunt Spot 1	2:23 PM	River Camp	Spent about an hour on the ground at hunt spot 1 before going back to River Camp
11	14-Oct	2:28 PM	River Camp	2:32 PM	Airport	
12	14-Oct	3:58 PM	Airport	4:02 PM	Hunt Spot 1	Spent 1.5 hours on the ground at the airport before returning to Hunt Spot 1
13	14-Oct	5:48 PM	Hunt Spot 1	5:51 PM	Airport	Spent 1.75 hours on the ground at Hunt Spot 1 before returning to airport
14	14-Oct	6:12 PM	Airport	6:17 PM	Hunt Spot 1	Spent 20 minutes on the ground at the airport before returning to Hunt Spot 1
15	14-Oct	6:24 PM	Hunt Spot 1	6:27 PM	Airport	Spent 10 minutes on the ground at Hunt Spot 1 before returning to Airport, he taxis around the parking area and parks at 6:47 PM
16	15-Oct	10:47 AM	Airport	11:27 AM	Hunt Spot 1	Flies circles around meadows, Hunt Spot 1, and River Camp before landing back at the Airport
17	15-Oct	11:44 AM	Airport	11:47 AM	River Camp	On the ground at the airport for 20 min before flying to River Camp
18	15-Oct	11:57 AM	River Camp	11:59 AM	Airport	On the ground for 10 min at River Camp before returning to Airport
19	15-Oct	12:08 PM	Airport	12:06 PM	River Camp	On the ground for a few minutes before returning to River Camp
20	15-Oct	12:11 PM	River Camp	12:14 PM	Airport	On the ground for a few minutes before returning to Airport, shuts down until 10/20
21	20-Oct	3:30 PM	Airport	4:15 PM	Beach Camp	Flies the XX river drainage and a bunch of circles near Beach Camp before landing at Beach Camp
22	20-Oct	4:26 PM	Beach Camp	4:41 PM	Airport	On the ground for 10 minutes at Beach Camp before returning to Airport
23	20-Oct	5:09 PM	Airport	5:23 PM	Beach Camp	On the ground for 30 min before returning to Beach Camp, flies one circle around a meadow near camp before landing
24	20-Oct	5:28 PM	Beach Camp	5:43 PM	Airport	On the ground for five min at Beach Camp before returning to Airport
25	20-Oct	6:05 PM	Airport	6:18 PM	Beach Camp	On the ground at the Airport for 15 min before returning to Beach Camp, flies two loops over a meadow near camp before landing and shutting down for the night.
26	21-Oct	1:23 PM	Beach Camp	1:41 PM	Airport	Flies a circle over the meadow near camp after take-off before returning to Airport
27	21-Oct	1:49 PM	Airport	2:01 PM	Beach Camp	On the ground for 7 minutes before returning to Airport and shutting down for night
28	21-Oct	2:08 PM	Airport	2:24 PM	Airport	Shut down for night at Airport
29	22-Oct	9:20 AM	Airport	12:40 PM	ANC	Flies a loop over the Beach Camp meadow before continuing on to ANC

101



102

Excerpt from Report of Interview, L.G.

NARRATIVE

- Hicks told [REDACTED] that he was the owner of World Class Outdoor Adventures and was NOT a field guide [REDACTED] provided emphasis and clarity that Hicks was not a guide)
 - Hicks told [REDACTED] that he was suspended and could not take hunters into the field.
 - [REDACTED] stated that Guide, Craig Hill, was employed by Hicks to take clients into the field hunting since he could not.
 - the camp was to hunt moose, goat, coastal brown bear, and black bear.
 - The following people were at the camp the entire duration of the hunt from October 7 to October 23.
 - Employee Alexander Marshal or Marshal Alexander was a packer.
 - Employee Craig Hill, a guide and owner of Alaskan Challenge Guide Service.
 - Owner Steve Hicks.
 - Client Harold ? from Utah. Nice guy but tried telling [REDACTED] how to do his job at times.
 - [REDACTED] guessed that Client paid \$40,000 to \$45,000 for the packaged group hunt for various species.
 - Client was an archery hunter and wanted to use his bow on all hunts. To Liam's knowledge he did.
 - a moose and brown bear were the only thing killed by the client.
 - Liam states that no other animals were killed and no other animals were shot at by client or employees while on location. Liam stated this included him.
 - [REDACTED] stated he did not hunt and had purchased a wolf tag and small game tag.
 - [REDACTED] made \$100 per day and received \$300 tip from Harold the client.
 - [REDACTED] was irritated on the low amount for almost a month of work and \$300 tip.
 - [REDACTED] believes packer Marshal received \$100 per day from Hicks.
 - [REDACTED] believes that packer Marshal received a \$300 tip from Harold the client.
 - [REDACTED] does not know what guide, Craig Hill received as a tip.
 - [REDACTED] does not know if owner, Steve Hicks, received as a tip and believes nothing if the trip cost \$40,000.
 - [REDACTED] was under the impression that Hicks was the owner and received the bulk of money from Harold the client.
 - [REDACTED] stated an Alaska State Trooper "Game Warden" flew into camp between October 7-10. Liam stated there were no issues.
 - [REDACTED] stated that Hicks flew Harold and Craig to a remote area to moose hunt for a few days.
 - that a moose was killed by Harold on day two of the moose hunt.
 - that Hicks flew to pick up Harold and Craig to get them and the moose meat back to camp.
 - [REDACTED] stated he was aware that a hunter cannot fly and hunt the same day. [REDACTED] clarified later that he believes it is okay to hunt and fly on the same day as long as hunting occurs first then flying in the same day.
 - that Harold killed a brown bear over a whale carcass on the beach.
 - that they used 4-wheelers to get to and from the beached whale.
 - that Craig and Harold were the only ones to go and hunt bear out of a simple stick blind.
 - the bear was killed with a bow at 30 to 45 yards.
 - that Marshal, Hicks, and [REDACTED] were always at camp doing chores when Craig and Harold were out hunting.
 - that when Marshal and [REDACTED] were building a trail for goat hunting that he did not know where Hicks was at times. When asked if Hicks could have been flying [REDACTED] stated that he could have been however he does not know because he was away building a trail.
 - [REDACTED] stated that other people flew over head at various times who Hicks knew some of those pilots.
 - that Hicks paid [REDACTED] check when they got back to Anchorage. Liam is not sure if it was a personal check or business check.
- (NOTE: in audio interview Liam changed his response and was adamant that Hicks paid him approximately

103

Exhibit #20

False statements, B.G. Sheep Hunt

During several separate interviews conducted by law enforcement, HICKS made false statements about many aspects of his illegal hunts and activities.

104

Excerpt from Interview Transcription, HICKS

3676 SA GENTZEL Um, how 'bout you? Where were you at when those guys were out in the
 3677 field?
 3678
 3679 HICKS What's that? Uh, one day, uh, or two days of it I was over in, uh, Chilligan
 3680 Bay.
 3681
 3682 SA GENTZEL Hm. Chilligan Bay, I don't know where that's at.
 3683
 3684 HICKS ...yep, and I've got a bait station that I went to. I was workin' that a little bit
 3685 and...
 3686
 3687 SA GENTZEL Hm.
 3688
 3689 HICKS ...uh, up the Beluga River.
 3690

105

3706 HICKS ...got stuck in Chilligan for I think a day or two with weather.
 3707
 3708 SA GENTZEL Oh, wow. Got ya. Is that in, uh...
 3709
 3710 HICKS But yeah, you know, I was back and forth...
 3711
 3712 HICKS ...you know? I'll come to town and get gas and drop...
 3713
 3714 SA GENTZEL Is that in the same guide use area or an adjacent guide use area or where?
 3715
 3716 HICKS Yeah, it's all the same, 1602...
 3717

106

630 HICKS: I mean, I went up into - I went around the corner too and stayed the night over

INTERVIEW WITH STEPHEN J. HICKS
Interviewer: Inv. Thomas Lowy
Case # 2017705916
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631 in, uh, whatever that one's called. I can't think of the other one. I was tryin' to
632 see if there was any bears in there. Um, what's the one - whatever the one in
633 the Chakachamna to the north...

671 HICKS: No. I looked around. I was kinda lookin' for some bear for my kid a little bit. I
672 was gonna try to get him out and then it just didn't - the weather just wouldn't
673 cooperate. It was just a pain so - I got stuck a couple days on the ground with
674 wind.
675

107

881 HICKS: ...'cause he bought a brown bear tag to shoot brown bear so if he shot a sheep
882 I was gonna try to move 'em over there for - I can't think of it. I've been
883 trying to think of it. I can't think of the name of that creek. It's just a few
884 miles around the corner though - of Chakachamna. You can look it up. It's
885 easy. Um, but I camped there - I camped there one night and I got stuck there
886 two nights but then I had another camp too around the corner, uh, over by -
887 what the hell is the name of the creek? I can't think of the name of the creek.
888 Coal Creek. I had a camp over there too. But that's more - that's bear too.
889 Move - I did move some bear over there but I just mostly saved that for bear.

891 LOWY: Mm-hm.

893 HICKS: For those two spots. That's those two spots is what I was lookin' for for bear
894 for him. So that's, I mean, in that instance that's what I was doin' was just
895 lookin' around, you know, spottin' - tryin' to - tryin' to find a good spot to kill
896 brown bear for him just 'cause I make trophy fee on the brown bear so - but,
897 uh, but yeah, it doesn't do me good to just sit right there. Usually if I'm gonna
898 stay out, you know, I'll go do other - other scouting or whatever I'm doing.

108

Summary of HICKS Cell Location Data During B.G. Hunt

- On 8/8/2018, the aforementioned subject/device had location hits in the Anchorage area and in/near the village of Tyonek.
- On 8/9/2018, the aforementioned subject/device had location hits in/near Anchorage area.
- On 8/10/2018, the aforementioned subject/device had location hits in/near the Anchorage area, in/near the Portage area, and various hits along the Seward Highway to the Sterling Junction. There are further location hits in the Kenai/Soldotna area.
- 8/11/2018, the aforementioned subject/device had location hits in/near the Kenai/Soldotna/Sterling area. There are further location hits in/near the Portage area and the Anchorage area.
- On 8/12/2018, the aforementioned subject/device had location hits in/near Anchorage area.
- On 8/13/2018, the aforementioned subject/device had location hits in/near Anchorage area.
- On 8/14/2018, the aforementioned subject/device had location hits in the Anchorage area and in/near the village of Tyonek.

109

Exhibit #21

False Statements, E.P. and C.C. Hunts

During interviews conducted by law enforcement, HICKS made false statements about many aspects of his illegal hunts and activities.

110

Excerpt from Interview Transcription, HICKS

217 LT FRENZEL Um, kinda wanna start it off what all did you hunt this year, who all did you
 218 have out with you this year?
 219
 220 HICKS Uh, well, I'm not a guide so I didn't have - I didn't have anybody out with me,
 221 what do you mean?
 222
 223 LT FRENZEL Well, you had a couple guys it looked, like, um, (EP) and (EP) up here.
 224
 225 HICKS Oh, yeah - yeah - yeah. For sure.
 229 HICKS Yeah, we hunted moose.
 230
 231 LT FRENZEL All right. What's your relationship with those guys?
 232
 233 HICKS We're buddies. They're clients but they're buddies. You know, we're friends
 234 now. I mean, my kid's go down next year and hunt at his place and, uh,
 235

111

248 LT FRENZEL Well, you said they were clients and now they're friends.
 249
 250 HICKS Well, they've been clients in the past. Sure, yeah. They're gonna come back
 251 and hunt with, uh, they're gonna come back and hunt with (Craig), uh, (Craig
 252 Hill) too.
 253
 254 LT FRENZEL Okay. Um, what are they huntin' when they come back with (Craig Hill)?
 255
 256 HICKS I'm not sure. You'll have to ask (Craig). I think - I don't know if they're
 257 gonna - I think brown bear is what they wanna hunt.
 327 HICKS What do you mean?
 328
 329 LT FRENZEL You said they were clients.
 330
 331 HICKS Uh, depends on what they're doin'. S- they did some trade with my airplane.
 332
 333 LT FRENZEL Okay.
 334
 335 HICKS So, um, but that's still all under contract with - well, that'll - that'll shift to
 336 (Craig) now as far as contract work goes.
 337
 338 LT FRENZEL Okay.
 339
 340 HICKS You know what I mean? They're still gonna do their stiff in southeast that
 341 they were contracted to do.
 342

112

446 LT FRENZEL So, um, when they came up this year was the scheduled moose hunt, was this
 447 planned, part of that...
 448
 449 HICKS Mm-mm.
 450
 464 HICKS "Otherwise I'm not doin' anything. I'm gonna go sheep huntin' for myself."
 474 HICKS "Then you're more than welcome to come up." Said, "We're gonna split
 475 cost." You know, "You're gonna pay - you're gonna pay your own ways out.
 476 I'm not flyin' ya," you know...
 477
 373 LT FRENZEL So how much of that contract did you fill with them as they were contract...
 374
 375 HICKS Zero this year.

113

Character

User Stephen Hicks (1646300472)
Text Haha for sure!!! Just like to show motivation and pos
 the worthless lazy pessimist out there who said I wou
 flying guiding etc... or just don't have the motivation to be a
 productive member of society! Life is what you make of it so kick
 ass and never let others insecurities or jealousy bring you down. I
 plan to be in the denali preserve with as many friends as want to
 come killing sheep and pissing off the park fish and feathers
 assholes as I can this fall!!!! Gotta have goals!!!
Time 2017-06-13 22:10:21 UTC

User Niki Roesch (1638905761)
Text Rawr!
Time 2017-06-13 23:41:42 UTC

User Stephen Hicks (1646300472)
Text @[100000411426150:2048:Clint Miller] shit! When do they not!!
 Hunted in preserve and I know who turned me in cause they were
 mad I was in their area, but fuck them!! I'm going back this year
 with 6 guys so far!! I fucking hate all of them!!

114

Author Stephen Hicks (1646300472)
Sent 2017-12-23 06:01:31 UTC
Body Man reds are up my pilot and mines asses!! He already had to lawyer up! I'm sure I'm next!! Fuckers just always want to torment us I swear!! Will see what happens

Author (GM GM) (503189191)
Sent 2017-12-23 06:01:53 UTC
Body For what

115

Author Stephen Hicks (1646300472)
Sent 2017-12-23 06:08:48 UTC
Body Not sure on me but we lost a goat or two last year we couldn't recover and they pissed about that I guess but I did everything I could to recover so can't see how that will amount to anything. Then they harassing all my guises clients etc...

Author Stephen Hicks (1646300472)
Sent 2017-12-23 06:08:54 UTC
Body Just trying to find anything they can

Author (GM GM) (503189191)
Sent 2017-12-23 06:09:46 UTC
Body I know

Author (GM GM) (503189191)
Sent 2017-12-23 06:09:59 UTC
Body They are a bunch of assholes

Author Stephen Hicks (1646300472)
Sent 2017-12-23 06:10:03 UTC
Body They can suck my dick!

Author (GM GM) (503189191)
Sent 2017-12-23 06:10:42 UTC
Body They are just fucking cocksuckers that don't deserve to be enforcing anything

116

Facebook Business Record

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Author

Stephen Hicks (1646300472)

Sent 2017-12-23 06:10:44 UTC**Body** They fuck me on the guiding thing and I promise I'll become the killingest mother fu let they ever seen!!! Lol**Author** Stephen Hicks (1646300472)**Sent** 2017-12-23 06:10:58 UTC**Body** Such a waste of taxpayers money**Author** GM GM 503189191)**Sent** 2017-12-23 06:11:05 UTC**Body** Yup**Author** GM GM 503189191)**Sent** 2017-12-23 06:11:12 UTC**Body** Troopers are scum**Author** Stephen Hicks (1646300472)**Sent** 2017-12-23 06:11:39 UTC**Body** Yep

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Facebook Business Record

Page 4591

Photo Id:

10207727729665014

Recipients Stephen Hicks (1646300472)

Graham Morrison (503189191)

Author Graham Morrison (503189191)**Sent** 2016-03-09 01:05:09 UTC**IP** 75.139.22.70**Deleted** false**Body** lookin strong!**Recipients** GM GM 03189191)

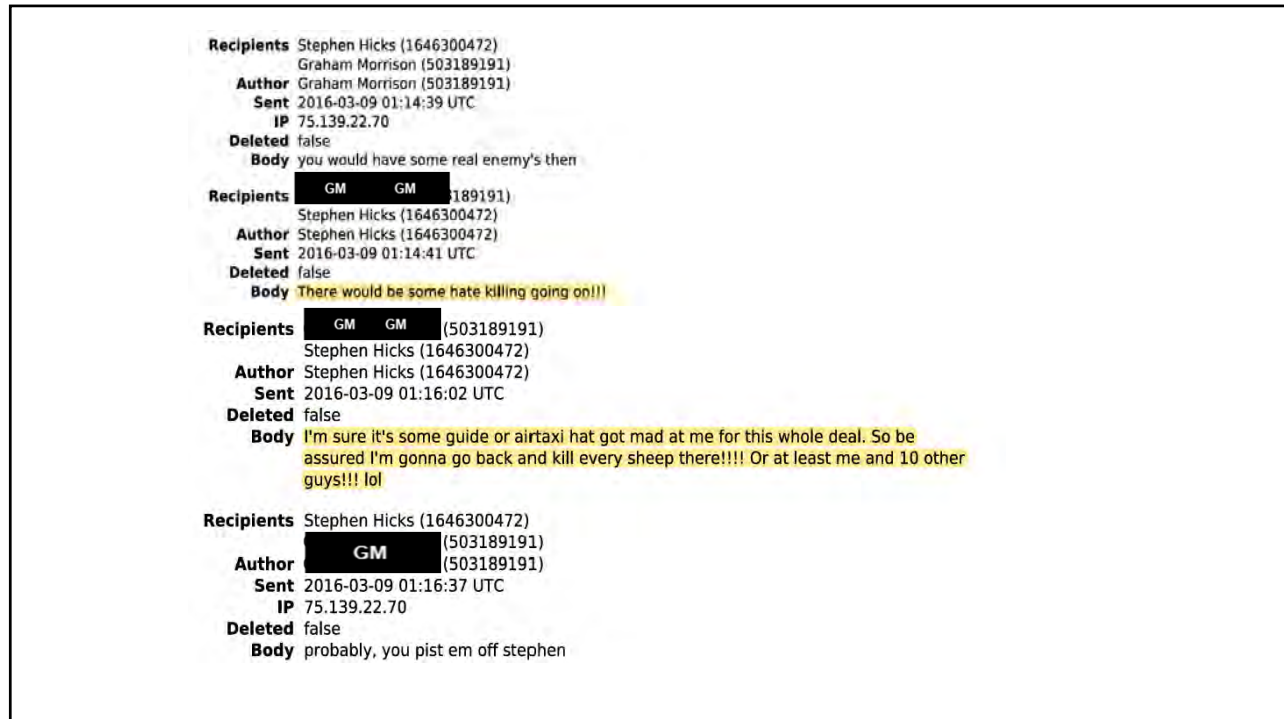
Stephen Hicks (1646300472)

Author Stephen Hicks (1646300472)**Sent** 2016-03-09 01:05:54 UTC**Deleted** false**Body** We need to guide in Africa where there's no rules really and we can have n offensive do and carry all out shit!!**Recipients** GM GM 3189191)

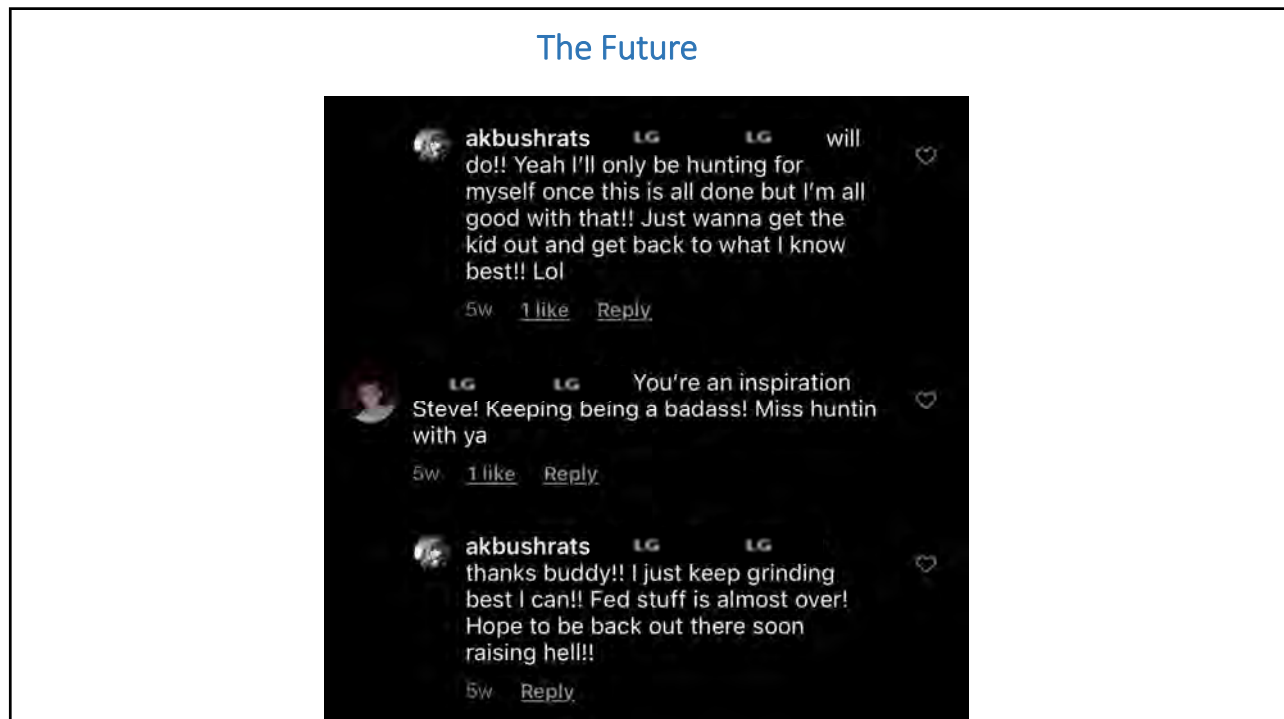
Stephen Hicks (1646300472)

Author Stephen Hicks (1646300472)**Sent** 2016-03-09 01:13:29 UTC**Deleted** false**Body** If I ever did quit guiding here it would scary the shit I would do for myself!!!! I'd be a killing mother fucker. I would get ever person I knew and we would all fly into the preserves or places where there's guides I hate and just have a big ass party!!!! And kill everything alive!!! Lol

118



119



120