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ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION

UNITED STATES OF AMERICA, Plaintiff, vs. BRYANT MIKKELSON, Defendant.	CR-25-89-GF-BMM-JTJ OFFER OF PROOF
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THE CHARGE

The defendant, BRYANT MIKKELSON, is charged by information with
Count 1: Failure to Report Taking of Grizzly Bear, in violation of 16 U.S.C.
§ 1538(a)(1)(G); 16 U.S.C. § 1540(b)(1); and 50 C.F.R. § 17.40(b)(1)(i), (ii).

PLEA

The defendant, BRYANT MIKKELSON, will enter a voluntary plea of guilty to the count in the information. The motion for change of plea filed with the Court represents, in the government's view, the most favorable disposition of the case against the defendant. *See, e.g., Missouri v. Frye*, 132 S. Ct. 1399 (2012).

ELEMENTS

The defendant will plead guilty because he is guilty of the count contained in the information. In pleading guilty, the defendant acknowledges that:

Count 1 – Failure to Report Taking of Grizzly Bear, in violation of 16 U.S.C. § 1538(a)(1)(G); and 16 U.S.C. § 1540(b)(1); and 50 C.F.R. § 17.40(b)(1)(i), (ii).

First, the defendant took a grizzly bear by killing it;

Second, the taking was unlawful; and

Third, neither the defendant nor the defendant's designee reported the killing within 5 days of occurrence to the Resident Agent in Charge, Office of Law Enforcement, U.S. Fish and Wildlife Service, 2900 4th Avenue North, Suite 301, Billings, MT 59101 (406–247–7355).

PENALTY

Count 1 charges the crime of Failure to Report Taking of Grizzly Bear, in violation of 16 U.S.C. § 1538(a)(1)(G); 16 U.S.C. § 1540(b)(1); and 50 C.F.R. § 17.40(b)(1)(i), (ii). This offense carries a maximum term of 6 months imprisonment, a \$25,000 fine, and a \$10 special assessment.

ANTICIPATED EVIDENCE

If this case were tried in United States District Court, the United States would prove the following:

On or about May 27, 2025, Mr. Mikkelson shot and killed a grizzly bear while black bear hunting in the Highwood Mountains in Choteau County, Montana. At the time of the killing, Mr. Mikkelson learned the bear was, in fact, a grizzly bear. Mr. Mikkelson sent text messages and photographs of the bear and of himself posing with the bear to acquaintances. Mr. Mikkelson discussed the killing of the bear in those text messages. However, neither Mr. Mikkelson nor any designee reported the killing to the United States Fish and Wildlife Service within 5 days of the killing. The United States Fish and Wildlife Service learned of the killing on or about June 2, 2025, through an anonymous tip. On June 10, 2025—two weeks after the killing—Mr. Mikkelson came forward to report the killing to the United States Fish and Wildlife Service.

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The United States would have presented this evidence through the testimony of law enforcement and lay witnesses.

DATED this th6 day of August, 2025.

KURT G. ALME
United States Attorney



RANDY TANNER
Assistant U.S. Attorney