

STATE OF WYOMING)
) : ss.
COUNTY OF CARBON)
IN THE CIRCUIT COURT
SECOND JUDICIAL DISTRICT

THE STATE OF WYOMING,
Plaintiff,
Docket No. CR-2020-025D

vs.
SEAN PATRICK AINSWORTH,
Defendant.
Y.O.B.: 1968

FILED

MAY 15 2020

CLERK OF CIRCUIT COURT
SECOND JUDICIAL DISTRICT
CARBON COUNTY, WYOMING
BY

INFORMATION

COUNT I

COMES NOW Ashley Mayfield Davis, County and Prosecuting Attorney of the County of Carbon, State of Wyoming, and in the name and by the authority of the State of Wyoming, informs the Court and gives the Court to understand that the defendant, **Sean Patrick Ainsworth**, on or about the 13th day of May, 2020, in the County of Carbon, in the State of Wyoming, did commit the crime of **Reckless Endangerment**, by recklessly engaging in conduct which places another person in danger of death or serious bodily injury, to: wit: Tim Ney, all in violation of §6-2-504(a), W.S. 2019. The misdemeanor provisions of §6-2-504(c), W.S. 2019, apply, with a maximum penalty of imprisonment for not more than one (1) year, a fine of not more than One Thousand Dollars (\$1,000.00), or both.

COUNT II

COMES NOW Ashley Mayfield Davis, County and Prosecuting Attorney of the County of Carbon, State of Wyoming, and in the name and by the authority of the State of Wyoming, informs the Court and gives the Court to understand that the defendant, **Sean Patrick Ainsworth**, on or about the 13th day of May, 2020, in the County of Carbon, in the State of Wyoming, did commit the crime of **Reckless Endangerment**, by recklessly engaging in conduct which places another person in danger of death or serious bodily injury, to: wit: Courtney Ney, all in violation of §6-2-504(a), W.S. 2019. The misdemeanor provisions of §6-2-504(c), W.S. 2019, apply, with a maximum penalty of imprisonment for not more than one (1) year, a fine of not more than One Thousand Dollars (\$1,000.00), or both.

COUNT III

COMES NOW Ashley Mayfield Davis, County and Prosecuting Attorney of the County of Carbon, State of Wyoming, and in the name and by the authority of the State of Wyoming, informs the Court and gives the Court to understand that the defendant, **Sean Patrick Ainsworth**, on or about the 13th day of May, 2020, in the County of Carbon, in the State of

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Wyoming, did commit the crime of **Reckless Endangerment**, by recklessly engaging in conduct which places another person in danger of death or serious bodily injury, to wit: T.N. (juvenile), all in violation of §6-2-504(a), W.S. 2019. The misdemeanor provisions of §6-2-504(c), W.S. 2019, apply, with a maximum penalty of imprisonment for not more than one (1) year, a fine of not more than One Thousand Dollars (\$1,000.00), or both.

COUNT IV

COMES NOW Ashley Mayfield Davis, County and Prosecuting Attorney of the County of Carbon, State of Wyoming, and in the name and by the authority of the State of Wyoming, informs the Court and gives the Court to understand that the defendant, **Sean Patrick Ainsworth**, on or about the 13th day of May, 2020, in the County of Carbon, in the State of Wyoming, did commit the crime of **Reckless Endangerment**, by recklessly engaging in conduct which places another person in danger of death or serious bodily injury, to wit, Carbon County Sheriff's Office Lieutenant Tom Laskia, all in violation of §6-2-504(a), W.S. 2019. The misdemeanor provisions of §6-2-504(c), W.S. 2019, apply, with a maximum penalty of imprisonment for not more than one (1) year, a fine of not more than One Thousand Dollars (\$1,000.00), or both.

COUNT V

COMES NOW Ashley Mayfield Davis, County and Prosecuting Attorney of the County of Carbon, State of Wyoming, and in the name and by the authority of the State of Wyoming, informs the Court and gives the Court to understand that the defendant, **Sean Patrick Ainsworth**, on or about the 13th day of May, 2020, in the County of Carbon, in the State of Wyoming, did commit the crime of **Shooting Across Any Public Road or Highway**, by firing any firearm from, upon, along, or across any public road or highway, all in violation of §23-3-305(c), W.S. 2019. The misdemeanor provisions of §23-6-202(a)(v), W.S. 2019, apply, with a maximum penalty of imprisonment for not more than six (6) months, a fine of not more than One Thousand Dollars (\$1,000.00), or both.

The action of the defendant is contrary to the statute and against the peace and dignity of the state of Wyoming.

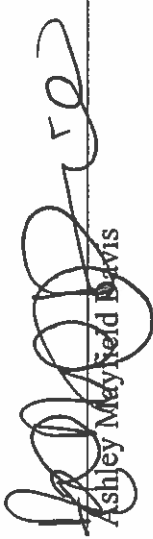
This information is supported by the affidavit of Tom Laskia of the Carbon County Sheriff's Office, which affidavit is attached hereto and incorporated herein by this reference.



Ashley Mayfield Davis, Carbon County and
Prosecuting Attorney
P.O. Box 1146
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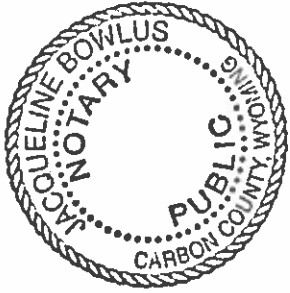
STATE OF WYOMING)
) : ss
COUNTY OF CARBON)


I, Ashley Mayfield Davis, County and Prosecuting Attorney, Carbon County, Wyoming, do solemnly swear that I have read the above and foregoing Information subscribed by me, that I know the contents thereof.


Ashley Mayfield Davis

STATE OF WYOMING)
) : ss
COUNTY OF CARBON)

Sworn to before me and signed in my presence this 15th day of May, 2020, and I do hereby so certify.




Notary Public
My Commission expires: 7/21/23

STATE OF WYOMING)
 :
COUNTY OF CARBON)

AFFIDAVIT OF TOM LAKIA

COMES NOW the undersigned, Tom Lokia, and after being first duly sworn, does depose and say:

1. I am a Lieutenant with the Carbon County Sheriff's Office, in Carbon County and have investigated the offense more specifically set forth below in that capacity. I have reviewed the reports and been briefed by the officers who have investigated this matter as well as have investigated this offense.
2. On or around 9:30 PM on May 13, 2020, Carbon County Sheriff's Office received a call of shots fired from the direction of 21727 STATE HIGHWAY 76, Sinclair, Carbon County, Wyoming. Officers responded to the area, specifically at the Ainsworth Ranch. The initial call came from a residence 400 yards from 21727 STATE HIGHWAY 76. The reporting party Courtney Ney, who lives at 21755 State Highway 76, who reported that there were shots fired and the shots were fired in the direction of her house. Timothy Ney was also present and as a veteran was familiar with the sound of a firearm and could confirm that the bullets were fired in the direction of their home. Both Mr. and Mrs. Ney reported hearing bullets over their heads in different locations outside of their home.
3. Law enforcement responded to the location that Mr. and Ms. Ney estimated where a weapon had been fired. Law enforcement made contact with Zach Ainsworth and questioned him about the suspected discharge of weapons. Zach Ainsworth admitted to firing a weapon. Zack Ainsworth was cited for reckless endangering and released.

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4. Law enforcement then made contact with the reporting party, Courtney Ney. The Ney home is located about four hundred (400) to five hundred (500) yards from the Ainsworth Ranch. While questioning Ms. Ney inside of her garage, Sean Ainsworth exited his home and fired several shots. Law enforcement then returned to the Ainsworth Ranch at 21727 STATE HIGHWAY 76. Law enforcement attempted to make contact with Sean Ainsworth. Sean Ainsworth was identified as Sean Patrick Ainsworth (Y.O.B. 1968). Sean Ainsworth admitted to firing a weapon. He stated that, "I should be able to shoot what I want when I want and where I want on my own property." He admitted to firing in the direction of law enforcement. At the time he was shooting, law enforcement was accompanied by both Mr. Ney, Mrs. Ney and a child. He admitted to having firearms inside his residence. He stated that he shot at his target that was approximately twenty (20) yards from his porch, which is between his porch and Interstate 80.
5. He refused to exit his residence and allow himself to be taken into custody by law enforcement. An arrest warrant was requested and obtained, and he agreed to exit his residence and be placed under arrest after law enforcement arrived at the scene with a signed arrest warrant. When the search warrant was executed for Mr. Ainsworth's residence, weapons and ammunition were located at each door of the residence.
6. On May 14, 2020, I executed a second search warrant for the outside premises of Mr. Ainsworth's residence. I was specifically seeking shell casings, a metal target in the shape of a turkey, measurements from Mr. Ainsworth's deck to the original complainant's home, and photographs of the area. Present with me were Sgt. J. Moore and Deputy A. Kelley.
7. Twelve (12) 9 mm spent cartridge cases were found on the deck along with a metal target

in the shape of a turkey approximately 1 foot wide. Photos were taken of all items. The cartridge cases and turkey target were seized for evidence. From my investigation, it was determined that a 9mm bullet can travel a distance of approximately 1 mile.

8. Measurements were taken using a laser rangefinder. It was determined that the fence of Mr. Ainsworth's property line (which was bent low enough to step over) was 13 yards from Mr. Ainsworth's porch. The property beyond the fence belongs to Carbon County, WY. It was also determined that the Ney's residence was 453 yards east of the Ainsworth residence on a direct line of sight.
9. A search beyond Mr. Ainsworth's fence revealed two beer light aluminum bottles that had been shot. These bottles were determined to be 26 yards east of the Ainsworth property on the Carbon County property.
10. After leaving the Ainsworth property, Sgt. Moore, Deputy A. Kelley, and myself looked for signs of shooting on the Carbon County property directly east and north of the Ainsworth residence. While searching this area a sign belonging to Carbon County, WY east and slightly north of the Ainsworth property was found to have been shot. This sign was measured to be 102 yards from the property. The bullet holes were at an angle approximately leading to the south edge of Mr. Ainsworth's property and it was determined the bullets could have possibly traveled to Interstate 80 which is north of Mr. Ainsworth's property.
11. After searching the Carbon County property all deputies left the area.
12. To the best of my knowledge, **Sean Patrick Ainsworth** is fifty-one (51) years old, having been born in 1968, and his last known address is 21727 STATE HIGHWAY 76, unincorporated Rawlins, Carbon County, Wyoming.

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DATED this 15 day of May, 2020.

Tom Lakia
Tom Lakia

STATE OF WYOMING)
 :
COUNTY OF CARBON)

Subscribed and sworn to before me this 15th day May, 2020, by Tom Lakia as his free and voluntary act and deed.



Jacqueline Bowlus
Notary Public
My Commission expires: 12/31/23