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SEALED

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KIMBERLY DELL DAVIDSON-
DROLET, JAXSON DAVIDSON,
DALLAS DAVIDSON, KRISTINE
MERRILL.

Defendants.

INDICTMENT

VIOS:
COUNT 1: Kidnapping, 18 U.S.C. §
1201(a)(1) and (h);
COUNT 2: Conspiracy to Commit
Kidnapping, 18 U.S.C. § 1201(c).

Case: 2:24-cr-00258
Assigned To : Campbell, Tena
Assign. Date : 8/6/2024

The Grand Jury Charges:

COUNT 1
18 U.S.C. § 1201(a)(1) and (h)
(Kidnapping)

From on or about January 18, 2023, through June 27, 2024, in the District of Utah and elsewhere,

**KIMBERLY DELL DAVIDSON-DROLET, JAXSON DAVIDSON, DALLAS
DAVIDSON, and KRISTINE MERRILL,**

the defendants herein, did unlawfully and willfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away Child A, a minor child, and in committing and in furtherance of the offense, willfully transported her from the State of Utah to the State of Missouri, and held her for ransom, reward and otherwise; and did aid and abet therein, all in violation of 18 U.S.C. § 1201(a)(1), (h), and § 2.

**COUNT 2
18 U.S.C. § 1201(c)
(Conspiracy to Commit Kidnapping)**

From on or about January 10, 2023, through June 27, 2024, in the District of Utah and elsewhere,

**KIMBERLY DELL DAVIDSON-DROLET, JAXSON DAVIDSON, DALLAS
DAVIDSON, and KRISTINE MERRILL,**

the defendants herein, and others known and unknown, unlawfully and willfully combined, conspired, confederated and agreed together and with each other to violate 18 U.S.C. § 1201(a), as charged in Count 1 of the Indictment.

It was a part and an object of the conspiracy that KIMBERLY DELL DAVIDSON-DROLET (DROLET), JAXSON DAVIDSON (J DAVIDSON), DALLAS DAVIDSON (D DAVIDSON, and KRISTINE MERRILL (MERRILL), the defendants,

and others known and unknown, would and did seize, confine, inveigle, decoy, kidnap, abduct and carry away Child A, a minor child, in order to disobey a lawful custody order of the Third District Court, Salt Lake County, State of Utah.

Overt Acts

In furtherance of the conspiracy and to affect the illegal object thereof, the following overt acts, among others, were committed:

From on or about January 10, 2023, through June 27, 2024, DROLET, J DAVIDSON, D DAVIDSON, and MERRILL, the defendants, and others known and unknown, conspired to kidnap Child A and remove Child A, from the State of Utah.

On or about January 10, 2023, DROLET sold her vehicle to Gauge Automotive for \$13,000.00 and deposited the check into her America First Credit Union. Three days later, on January 13, 2023, DROLET withdrew \$16,000.00 from her America First Credit Union account. From January 20, 2023, to February 13, 2023, DROLET transferred the remaining balance of her America First Credit Union account to her sister MERRILL via Zelle.

On January 23, 2023, in the early morning hours, DROLET took Child A from the custodial parent, leaving the state of Utah. When leaving Utah, DROLET placed belongings in boxes and duffle bags and placed them into, J DAVIDSON's truck. J DAVIDSON admitted that he and DROLET had planned and discussed taking Child A out of the State of Utah. MERRILL was present at the apartment and assisted in their departure from Utah.

J DAVIDSON drove DROLET and Child A, out of Utah to the state of Missouri. J DAVIDSON told law enforcement that he took DROLET and Child A to Kansas, when in truth and fact, J DAVIDSON drove DROLET to Missouri. DROLET left her cell phone at her apartment in Utah so that she could not be tracked, and she purchased a black burner flip phone. MERRILL took possession of DROLET's cellphone and concealed the cell phone from law enforcement. MERRILL stated to Murray police that she destroyed the phone when, in truth and fact, MERRILL had given the cell phone to D DAVIDSON.

During the drive to Missouri, DROLET and MERRILL communicated via phone calls providing details of their trip and location to MERRILL. J DAVIDSON, D DAVIDSON, and MERRILL hid DROLET'S location from law enforcement.

DROLET mailed letters back home to her other children in Utah through her sister MERILL in order to conceal DROLET's location. In a letter dated March 28, 2023, DROLET stated her leaving Utah was not a panicked decision or impulse and that she had been planning her flight for fourteen (14) months. DROLET further stated she had changed her and Child A's names and reiterated the plan had been in place for over a year.

In another letter dated May 3, 2023, DROLET included instructions for her other children on how to write back to her. DROLET instructed her children to send letters to MERRILL and MERRILL would forward the letters to DROLET to keep DROLET's

location secret. MERRILL, J DAVIDSON, and DAVIDSON continued to hide DROLET and Child A's location to law enforcement.

In communications between DROLET and D DAVIDSON, the two talked about sending new phone cards to D DAVIDSON and to use them beginning July 1, 2024. DROLET stated in text messages that she felt safe in Missouri because, "they don't participate in extradition," and stated she, and P.D., had been discussing plans to flee to Thailand. D DAVIDSON and DROLET also discussed plans and options to further evade capture; all in violation of 18 U.S.C. § 1201(c).

A TRUE BILL:



FOREPERSON OF GRAND JURY

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