



Christopher J. HicksDistrict Attorney

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January 17, 2025

Board of Parole Commissioners 1677 Old Hot Springs Road, Ste. A Carson City, NV 89706-0677

RE: Jason Schilo Brown (NDOC #1147705)
WCDA Opposition to Release on Parole

Dear Commissioners:

Over the course of several weeks spanning June and July in 2014, Jason Schilo Brown repeatedly and sadistically tortured, dismembered, killed seven dogs. Simply put, and as Washoe County District Attorney Chris Hicks has previously stated, "This case is the worst animal-cruelty torture case we've ever seen in Washoe County, and probably in the State of Nevada." Mr. Brown used Craigslist to purchase dogs from multiple owners, with the sole purpose of inflicting as much pain on them as he possibly could for his own pleasure. The prior owners wanted nothing other than for the dogs to be welcomed into a loving home with compassionate caretakers, but Mr. Brown shattered those expectations and violated their trust. After purchasing dogs under the guise of providing them love and care, he took them to what he described as his "house of pain" and proceeded to beat, strangle, throw, stab and cut, water board, and sodomize them, before ultimately killing them. Mr. Brown dismembered and skinned the dogs, placing the skins on his arms saying he was going to make a coat from them. On one instance, he cut off a dog's vagina after she had stopped moving and shoved it in her own mouth. Mr. Brown specifically identified pugs as a breed he liked to torture because they "scream like a child."

Mr. Brown was finally caught when police and Regional Animal Services were dispatched to a local motel where he was staying and observed a horrifying scene. There, authorities observed the body of a small dog in the bathtub which had been decapitated and its tail severed; four severed dog heads and seven severed dog legs in the refrigerator; a bucket of animal skins; and dog parts throughout the room, including a dog's ear and penis next to the bathtub.

The deliberate, methodical, and repeated acts Mr. Brown committed shock the conscious, yet that wasn't enough for him. Mr. Brown videotaped his brutality of these dogs, so that he could go back and later watch them, as if he was proud of what he had done, and so that he could show the videos to other people, which he did as if to brag about it. The Honorable Elliott Sattler, who presided over the case and watched the videos at the Sentencing Hearing, stated that he was "shocked and appalled." Judge Sattler initially inquired whether he needed to watch the videos, but after seeing recognized their value in determining an appropriate sentence because they showed "exactly what you did" and that they "just completely drive home how barbaric you were behaving." The videos are gruesome and graphic in the worst way, and this Letter does not - and cannot - accurately portray the violence Mr. Brown inflicted on innocent dogs. As Judge Sattler put it, "those images are things that you just never unsee."

Mr. Brown was charged with seven counts of Torturing and/or Killing an Animal, and he was convicted of all seven counts. The Washoe County District Attorney's Office ("WCDA") sought the maximum sentence available by law, because he deserved it. Judge Sattler, in fact, imposed the maximum sentence on all seven counts and ordered that each count run consecutive to the others. Clearly, the sentence imposed was structured in a way so that Mr. Brown would serve the lengthiest prison term available under the law, which resulted in an aggregate sentence of 28 years, with parole eligibility after 11 years and 1 month.

Mr. Brown was arrested on July 9, 2014. Now, less than 11 years since his arrest, Mr. Brown is seeking release on parole, for the second time. Mr. Brown still hasn't served the minimum sentence imposed, which is wholly at odds with the sentence sought by the WCDA and the sentence imposed by Judge Sattler. The fact that Mr. Brown has had the opportunity to seek parole twice before he has even served his minimum sentence shines a spotlight on the fallacy, and failures, of sentencing laws. Such laws are

 $^{^{1}}$ Mr. Brown previously sought, and was denied, parole in 2022, only 8 years following his arrest. The WCDA opposed Mr. Brown's prior request for parole as well. The concerns raised by the WCDA then remain now, and the points in opposition to parole then are re-emphasized here.

 $^{^2}$ To be clear, the undersigned acknowledges that the law, in place at the time Mr. Brown was sentenced for the offenses he committed, allows him to seek

misleading to everybody - the community, the District Attorney's Office, the presiding Court, and even Mr. Brown himself - and represents a great injustice. Respectfully, Mr. Brown is not deserving of release on parole, period; but he certainly is not deserving of release now, prior to the minimum sentence imposed by the Court.

Also of note is the Nevada Legislature's passage of Assembly Bill 159, which was a direct response to Mr. Brown's early parole eligibility. The law passed with near unanimous support, which effectively removed the crime of Torturing and/or Killing an Animal from those offenses which afforded credits to be deducted from the minimum prison term. This law became effective on May 31, 2023 - the undersigned recognizes it is not binding on Mr. Brown's case and his parole eligibility, since it was passed after he was sentenced. However, it is illustrative of the strong reaction to Mr. Brown's early parole eligibility, and it provides significant, persuasive authority that he is not deserving of parole prior to even serving his minimum term. As Assemblyman P.K. O'Neill stated at the Assembly Committee on Judiciary Hearing, related to this bill, Mr. Brown's case "is probably one of the most disturbing cases of animal abuse ever encountered in Nevada."

At his prior parole hearing in 2022, Mr. Brown acknowledged the pain and suffering he caused, and pointedly recognized that he earned every day he spent in prison. He stated that at the time of his offenses, he was experiencing psychological issues, abusing drugs, and was not in the right state of mind, but claimed he was a changed person. However, he also stated that he did not initially intend to torture or kill dogs when he procured them, but the evidence overwhelmingly belies that claim. Further, other than that hearing, where of course he put his best foot forward because there was a direct benefit to him (that being release from prison on parole), Mr. Brown has otherwise yet to truly accept responsibility for the horrific crimes he committed and has not shown any sincere remorse. When confronted with specifics of what he had done during the investigation, Mr. Brown effectively denied knowledge and claimed that he had blacked out. Additionally, he pled no contest to the charges, which by its very nature fails to

early release. The undersigned's letter in no way is suggesting that this Board cannot consider Mr. Brown's request for parole at this time; instead, this letter respectfully submits that this Board should not grant parole.

admit guilt. During his Presentence Investigation Report interview with the Division of Parole and Probation, Mr. Brown related that he had no recollection of what occurred. After his convictions, Mr. Brown faulted his attorney for not filing an Appeal. Further, Mr. Brown filed a Post-Conviction Petition for Writ of Habeas Corpus, wherein he blamed his attorney for his pleas and claimed his attorney did not adequately represent him. When his Petition was dismissed by the District Court, Mr. Brown appealed that ruling, which was denied. Following his first parole hearing, Mr. Brown challenged how that hearing was conducted, filing a Writ of Mandamus. When that was denied, he appealed it to the Nevada Supreme Court (currently pending).

The WCDA continues to be concerned about future risk to the safety and welfare of others that Mr. Brown presents. During the timeframe Mr. Brown was torturing and killing dogs, he told a friend that he had "urges of rage" and was "violent like extremely angry." A psychological evaluation, obtained in preparation of sentencing, revealed that Mr. Brown had "a moderate degree of psychopathic traits." The evaluator also determined Mr. Brown to have narcissistic and antisocial personality features, which involved his "reckless disregard for his safety and and impulsivity." Alarmingly, rights/safety of others evaluator also determined that Mr. Brown's probability of violence re-offense after seven years is 35% and after ten years is 48%. In fact, numerous studies indicate that animal cruelty is often linked to a variety of other crimes, particularly violent offenses towards humans. Past animal abuse is such a strong indicator of future violent behavior that the Federal Bureau of Investigation (FBI) uses it as a predicator when profiling dangerous and violent criminals.3 Further, Mr. Brown has boasted that one of his strengths is his "ability to manipulate people and situations." All of this, of course, is in addition to the disturbing facts and circumstances of the instant case itself. Those personality traits do not dissipate, and accordingly, Mr. Brown continues to present as a significant public safety risk.

 $^{^3}$ In 2016, the FBI researched 259 adults who were arrested from 2004 to 2009 for committing acts of animal cruelty. Of those 259 offenders, 45% were arrested for another criminal incident after their act of animal cruelty, and 74% had information regarding acts of interpersonal violence.

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Mr. Brown deserves to remain in prison, and should not be released on parole, due to the alarming and repetitive cruelty he exhibited towards multiple dogs; his violent, manipulative, impulsive, and psychopathic characteristics which legitimately places others at risk of harm; and his request for parole before he has even served the minimum term imposed by the Court. Parole is an act of grace, and Mr. Brown is not deserving of such. I respectfully, but strongly, ask that you deny Mr. Brown's request for parole.

Sincerely,

CHRISTOPHER J. HICKS
District Attorney

ZACH YOUNG

Assistant District Attorney